

APPENDIX 4 – SUMMARY OF COMMENTS RECEIVED FROM INVITED PARTIES

Name	Basis for comment	Date	Issue
Auckland Council (and Auckland Transport) summary memorandum here ; associated annexures on fast-track webpage	Relevant local authority (s53(2)(a))	28 October 2025	<ul style="list-style-type: none"> Abatement and Cease Works Notices for Stage 1 (issued 1 September 2025) – there is progress towards resolving these. Enforcement action is accordingly on hold. Earthwork (erosion and sediment control): generally appropriate, however recommends some changes to conditions (at [30]-[31]). Geotech and land stability: considers this can be suitably managed, however recommends Slope Stability Monitoring Plan is developed. Groundwater diversion and dewatering: can be appropriately managed. Overland flow paths: can appropriately managed, however recommends conditions. Noise and vibration: broad agreement that works can be carried out in accordance with permitted standards. Conditions appropriate. Air quality: agrees with Applicant’s assessments. Considers air quality can be appropriately addressed through the applicant’s offered management plans and conditions. Transport: proposal could generate potentially significant adverse road safety effects. Information gaps have meant AT cannot reach a conclusion of the effects. Council’s Traffic Engineer supports the proposal subject to the resolution of Stage 1 (although has deferred effects assessment on roading infrastructure to Auckland Transport). <ul style="list-style-type: none"> AT says need pavement impact assessment, Geotech report, structural assessment. AT and Council’s traffic engineer considers there are uncertainties with timings means drafting conditions is difficult. AT and Council strongly support sealing of Pebble Brook Road. Council requests that information be formally requested under s67 and conditions require upgrades at an appropriate time. AT and Council consider Waitoki/Pebble Brook Road intersection has potential to be a significant road safety issue. Consider this can be addressed through conditions. Freshwater ecology: acceptable mitigation, offsetting and compensation but still significant. Loss of stream extent. Proportional assessment.

			<ul style="list-style-type: none"> ○ Native Freshwater Fish relocation plan considered appropriate. ○ Offsets considered appropriate, meet policy requirements, will achieve positive biodiversity outcomes and no net loss. • Terrestrial ecology: agrees with the Applicant that the project will achieve overall net gain for terrestrial ecology and indigenous biodiversity values. Notes resource consent lodged for pest-proof fence. • Landscape and visual: fundamental information gaps. Potential to generate significant adverse visual and landscape effects. Proportionality assessment needed. Notes response to Brown NZ Ltd query regarding topsoil. • Cultural values: no major concerns, however, fundamental information gaps. Proportionality assessment needed. • Has not identified any reason the application must be declined under s85(1). • Overall, the application has potential to meet Part 2 of the RMA or achieve the RMA's purpose – however, this has not yet been adequately demonstrated due to information gaps with respect to landscape and visual effects and cultural values effects. This may potentially meet the s85(3) threshold for declining collectively (where the adverse impacts could be sufficiently significant to be out of proportion to the regional benefits, even after taking into account conditions, mitigations etc).
Neighbourhood collective summary comment here ; associated appendices on fast-track webpage	Group of 27 adjacent neighbouring properties (ss 53(2)(h) / 53(2)(i) / 53(3))	28 October 2025	Provide assessments on dust nuisance, acoustics, engineering geology and geotechnics, groundwater, streams and farm wells, structural and civil engineering (single lane bridge on Pebble Brook Road), and landscape assessment. Overall oppose the application due to adverse impacts being out of proportion to the project's regional benefits, particularly in respect of air quality and dust, ecology, noise, and traffic safety, and unable to be avoided/remedied or mitigated by the conditions, or offsetting and compensation proposals. Key issues: <ul style="list-style-type: none"> • Mitigations from Stage 1 of the Quarry expansion remain unimplemented and must be attended to • Absence of meaningful consultation on the Project • Air quality: propose conditions • Noise: lack of clarity regarding timings and noise levels of the quarry. • Traffic and road condition Pebble Brook Road, traffic safety, dust, noise, single lane bridge.

			<ul style="list-style-type: none"> • Groundwater: farm bore at 70 Pebble Brook Road. Propose conditions to deal with same. • Landscape and visual: reference to non-complying activity test under s104D of the RMA. • Ecology and offsetting: lack of resource consent. Timing: do before site works. • Economic impact: deficiencies affect credibility • Greenhouse Gas: questions base data in assessment. Seeks that the Panel obtain a peer review. • Erosion and sediment control: reference abatement notice. Concerns around timing of earthworks. • Site rehabilitation: requests a bond.
Kate Jones and Charles Wedd cover letter here , associated appendices on fast-track webpage	Adjacent property (ss 53(2)(h) / 53(2)(i))	28 October 2025	<ul style="list-style-type: none"> • Opposes the application entirely, and in particular the destruction of a part of a SEA to create the overburden dump 'Pit A'. • Suggest numerous errors in the applicant's application, including misclassifying indigenous vegetation in the area to be Pit A and resultingly wrongly identifying the forest type present and scale of effects. • Argues substantive application is out of scope – encloses legal opinion of Madeline Wright dated 27 October 2025 which considers (i) an application cannot be made for Stage 2 of the expansion only, and (ii) substantive issues favour decline in entirety or alternatively in part as it relates to Pit A. • Questions availability of the aggregate resource and the Applicant's calculations – says the Applicant has overstated the resource and therefore the significance of the Project. • Considers the Applicant has failed to identify the true nature of the pit proposed for Forested Area A (overburden dump, not an area of aggregate extraction). Proposes condition prohibiting offsite material being deposited. • Highlights importance of SEA and ONL. • Hours of operation: seeks that these be in line with other operators (6:30am – 4:45pm on weekdays; 6:30am – noon on Saturdays). • Highlights that their property is <u>not</u> within the Quarry Buffer Area – it is in rural production zone and adjoins the Special Purpose Quarry Zone. • Suggests that there may be effects cumulative with ongoing operations at Winstone's Flat Top Quarry.

			<ul style="list-style-type: none"> • Presents a series of questions as to robustness of figures including cut depths and amount of fill and quarryable material. Claims figures in Application are fabricated. • Suggests the application presents a land stability risk, with consequential flood risk. Raises issues of design and engineering. • Raise issue of s104(2EA) "may have regard to any previous or current abatement notice ... in previous 7 years". Table shows series of abatement notices. • Are "feeling real grief at what the Applicant plans to do".
<u>Minister for the Environment</u> (Hon Penny Simmonds)	The Minister for the Environment (s53(2)(j)) / relevant administering agency 53(2)(k)	28 October 2025	<p>Considers:</p> <ul style="list-style-type: none"> • Section 6 of the RMA and the NPS-IB to be particularly relevant to Project • Potential adverse effects on biodiversity may be manageable through the setting of conditions. • Proposed conditions refer to expiry 35 years after the commencement date, however, the quarry's operational lifespan is proposed to be 45 years. • Assessments have not directly addressed potential adverse effects on six nearby SEAs. <p>Requests:</p> <ul style="list-style-type: none"> • revising consent conditions to align timeframes for offsetting or monitoring with the quarrying operation's lifespan. • further information regarding effects on SEAs.
<u>Associate Minister of Transport</u> (Hon James Meager)	Relevant portfolio Minister (s53(2)(j))	22 October 2025	Supports the Project. Application aligns with Government's strategic priorities. Says aggregate is an important product necessary for the development of buildings, roading and infrastructure, and increasing aggregate supply near key growth areas may reduce costs for Auckland's construction sector and improve infrastructure delivery. Has not assessed operational impacts on the local transport network.
<u>Minister for Infrastructure</u> (Hon Chris Bishop)	Relevant portfolio Minister (s53(2)(j))	24 October 2025	Broad support for the Project, for growth and prosperity.
<u>Forest & Bird</u>	Any other person the panel considers appropriate to invite to comment (s53(3))		<p>Seeks that approvals for the Project be declined on the basis that threshold for under s85(3) of the FTAA is met.</p> <ul style="list-style-type: none"> • Identifies range of significant adverse effects on the extent, quality and function of the SEA and ecosystems.

			<ul style="list-style-type: none"> • Raises concern regarding the Schedule 2 FTAA listing for the project (Stages 2 and 3) vs. the substantive application (Stage 2). Considers this may have implications for extent of regional or national benefits. • Given that resource consents for off-site offsetting and compensation are to be sought outside of FTAA, suggests there is uncertainty for decision making on the significance of adverse impacts of the project. • Raises points around interpretation of the FTAA's decision-making framework, in particular, s81(5) (which relates to consideration of benefits of staged projects). • Says that AUP zoning was based on where minerals were known to exist and be accessible for extraction, not whether the area was appropriate in other respects such as on natural values. Says the zoning of Special Purpose – Quarry Zone does not override the environmental protection requirements of the SEA, ONL, or High Use Stream Management Area overlays. Says the “avoid where practicable” requirement in SEA D9.3(1)(b) and quarry zone H28.3(3) has not been adequately justified for the A-pit, and this weighs against the project. • Impacts on biodiversity. Mitigation and management measures “are fundamentally inadequate in both scope and effect”. Scale of mitigation disproportionate to the scale of clearance. Offsetting, then compensation, not properly stepped through. Offsetting and compensation proposed is uncertain and incomplete in terms of location and timing and this has been deferred rather than resolved in advance. Questions whether the proposal achieves the AUP, NPS-IB, NPS-FM hierarchy. In any event, considers the proposed mitigation and offsetting cannot compensate for the irreversible destruction of indigenous forest and aquatic habitat within a SEA. • Questions the overburden location. Suggests there is a lack of justification for selecting Forested Area A (A-Pit) as the location for the proposed overburden dump. No alternative assessment provided meaning claim of reduced fragmentation is unsubstantiated, and effects management hierarchy has not been properly applied – and avoidance is possible. No functional/operational need for A-Pit location. Says if Panel is minded to approve the Project, the A-Pit area should be retained as a SEA. • Questions the extent of regional or national benefit – claimed benefits of reduced transport-related emissions, and aggregate yield and use given the
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			<p>lack of detail and absence of testing/sampling. Questions whether aggregate use in landscaping provides a regional benefit.</p> <ul style="list-style-type: none"> • Ecosystem classification. Information on identified site specific values of the WF11 areas within the A-Pit appears to be lacking • Extensive comments on proposed conditions. Issues with consent duration, numbering, timing of when reports are to be submitted to council. Issues with management plans. Range of other comments on specific conditions.
<u>Auckland Conservation Board</u>	Person from whom comment on wildlife approval must be invited (s53(2)(iv))		<ul style="list-style-type: none"> • Has three substantive concerns: <ul style="list-style-type: none"> ◦ Risks of proposed offsetting being unsuccessful. ◦ Cumulative Impacts (of Flat Top Quarry). ◦ Overburden location (most valuable and threatened portion of SEA). • Records: <ul style="list-style-type: none"> ◦ Wildlife translocation and vegetation offsetting “appear to largely follow the recommended guidelines ... if the revised recommendations from Auckland Council and DOC are accepted.” ◦ Likelihood of proposed mitigation measures succeeding is uncertain. ◦ Will clear 30ha of indigenous vegetation -> 14% of SEA. This will have direct habitat loss and edge effects. 13 TAR plant species in forested areas to be lost. Impact the ecological value and potential viability of SEA and ONL. ◦ Permanent removal of 2.5km of streams – no scope to offset stream restoration • Recommends that the Panel: <ul style="list-style-type: none"> ◦ Establish specific consent conditions to ensure that the applicant maximises the probability of proposed vegetation planting to the north of the site succeeding, including ongoing commitments to pest control and adaptive management practices based on regular monitoring. ◦ Establishes specific consent conditions to ensure that the applicant maximises the probability of the proposed lizard relocation succeeding including ongoing commitments to pest control, habitat management and adaptive management practices based on regular monitoring. ◦ Requests that the applicant complete an evaluation of alternative over-burden disposal sites within the project location.

			<ul style="list-style-type: none"> ○ Adopts DOC's recommendation of limiting the term for the wildlife approval to only 10 years, to allow for updates based on changing conditions and knowledge. ○ Supports DOC's recommended revised conditions for the Lizard Management Plan.
<u>Department of Conservation</u>	Relevant administering agency (s53(2)(k))		<ul style="list-style-type: none"> • Makes a series of recommendations: <ul style="list-style-type: none"> ○ Regarding effects on terrestrial flora and ecosystems, recommends: <ul style="list-style-type: none"> ▪ additional guidance and supervision during vegetation clearance; ▪ taking steps to maintain gains in the pest exclusion area in the long term; ▪ amending the approach taken to drone-based seed dispersal; ▪ reconsidering the proposed approach to tackling potential effects on plantings from drought conditions; ▪ adding a translocation action to the proposed Threatened and At-Risk Plant Management Plan; ▪ amending offsetting targets to better capture species richness, functional diversity and habitat complexity; ▪ the addition of a consent condition to require that vegetation monitoring reports are provided to the Department. ○ Regarding effects on bats, recommends compensation for future loss of bat roosts by undertaking a greater area of predator control within the Applicant's landholding around the quarry (all forested areas within the landholding). ○ Regarding proposed offsetting and compensation for terrestrial ecology, recommends amendments to conditions relating to the Pest Control and Elimination Plan for the Oldfield Road site. ○ Regarding effects on aquatic ecology, considers insufficient information has been provided to determine whether effects will be appropriately addressed and further information required is: <ul style="list-style-type: none"> ▪ information on the location and extent of potential values that are proposed to be gained; ▪ evidence demonstrating that the proposed positive effects on aquatic values are appropriate to compensate for the values to be lost; and

			<ul style="list-style-type: none"> ▪ information on the timeframe within which offsetting and compensation measures are anticipated to result in positive effects. • If these concerns are addressed, DOC considers effects can be appropriately managed. • Considers that a complex freshwater fisheries approval may be required. • Considers the Oldfield Rd site seems appropriate and ecologically relevant – long term funding and maintenance. • Conditions are “mostly appropriate” but “could be improved”. • Assessment of ecosystem values are considered appropriate. • Proposal to manage effects on flora and ecosystems in accordance with the NPS-IB are generally supported, but with some recommendations. • Recommended changes to conditions. • Wildlife approval: overall adequate protection for lizards, with some recommendations in the s51 report. • No issue with terrestrial birds. • Accepts that no wildlife approval for bats is required, given standard protocols to avoid killing bats and no intention to handle them. However, removal of established forest lowers the availability of bat roosts, including future roosts. Recommends greater area of predator (pest) control. Pest control needs to be long term – rats, stoats, possums. • Offsetting and compensation – comments as to methodology. DOC does not consider Panel can rely on the BCM approach used by the Applicant but indicates that overall package is acceptable. • Suggests Applicant clarify various aspects of aquatic ecology.
<u>Grant and Melissa Allen</u>	Adjacent property (ss 53(2)(h) / 53(2)(i))		Strongly oppose the Project due to visual impacts (property situated on elevated part of Haruru Rd with views of area to be deforested), property value effects, slope stability, effects on threatened habitats and species, soil erosion and degradation, waterway degradation from runoff, air pollution, noise pollution. Say Haruru Rd was forgotten by Applicant’s landscape consultant in the original application.
<u>Michele and Murray Coombridge</u>	Adjacent property (ss 53(2)(h) / 53(2)(i))		<p>Oppose the Proposal due to:</p> <ul style="list-style-type: none"> • Ecological effects: deforestation/indigenous biodiversity impacts in A-Pit area (being SEA and ONL) • Visual amenity

			<ul style="list-style-type: none"> Noise Dust Economic impact Stream degradation Archaeological sites of significance, including to Māori <p>Request that the A-Pit quarry and overburdened dumping area be declined, however should it be granted, that the consent holder be required to purchase their property at current market value.</p>
<u>Ross and Jenny Adler</u>	Adjacent property(ss 53(2)(h) / 53(2)(i))		Strongly oppose the Project due to destruction of forest and waterways, outlook/view impacts, property value effects, noise, odour and dust.
<u>Raymond Phillips</u>	Adjacent property (ss 53(2)(h) / 53(2)(i))		Is generally supportive of the Quarry proposal. Suggestion to tarseal Pebble Brook Road.
<u>Scott Family</u>	Adjacent property (ss 53(2)(h) / 53(2)(i))		<p>Seeks that the Project be declined unless the following areas addressed:</p> <ul style="list-style-type: none"> Ecological effects: impact on SEA, carbon skins, noise and vibration effects, air pollution, waterway and aquatic ecosystem loss. Economic and community considerations: requests evidence of the financial viability of the project and restoration costs. Consider the stated number of jobs sustained – 21 in the regional economy – is maintaining existing jobs not creating new jobs operating practices. Hours of operation: suggest schedule of five days per week from 6:30am to 4:45pm similar to the Flat Top Quarry.
<u>Brent Chamley</u>	Adjacent property (ss 53(2)(h) / 53(2)(i))	03.10.2025	<p>Has concerns regarding:</p> <ul style="list-style-type: none"> Traffic effects, air quality effects, and related noise/vibration effects, public health effects. Traffic speeds and braking at bend outside the commentor's property causes dust and vibration. Safety concern at the Pebble Brook Rd / Waitoki Rd intersection, the 100km/h speed limit for single-lane bridge on Pebble Brook Road. <p>Suggests sealing Pebble Brook Rd between Waitoki Rd and the Quarry entrance and reducing speed limit on Pebble Brook Rd to 60 km/h. Considers that extending the 60 km/h speed limit south along Waitoki Rd to include the Whitehills-Pebble Brook intersection would enhance safety.</p>