

1.0 APPLICATION DESCRIPTION

Application and property details

Fast-Track project name: Hunua Quarry Expansion

Fast-Track application number: FTAA-2603-1185

Council application number: BUN60464053

2.0 Technical Specialist Memo – Economics

To: Warwick Pascoe (Principal Project Lead) and Emma Chandler (Planner)

From: Rodney Yeoman, Director, Formative

Qualifications & Relevant Experience:

I hold the qualification(s) of: Bachelor of Commerce and Bachelor of Laws from the University of Auckland and Postgraduate Honours in Economics from the Australian National University and have 20 years of experience in economics e.g. policy assessment, industry and markets research, the form and function of urban economies.

I am a full member of New Zealand Association of Economists, Population Association of New Zealand, and New Zealand Association for Impact Assessment. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, and Fast-track Approvals Act (FTAA) applications, and have appeared as an expert witness before consent authorities and the Environment Court on multiple occasions.

Preparation in Accordance with the Code of Conduct:

I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses ([Code](#)), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Signature:



Date: 27 July 2026

3.0 Executive Summary / Principal Issues

- This specialist response reviews the Economic Assessments provided in support of the proposed Hunua Quarry Expansion. I conclude that the proposal aligns with the purpose of the FTAA, and I therefore support the development on economic grounds.
- My review and involvement with the project includes the following:
 - **Pre-substantive Application Review:** review of high-level economic effects report (Appendix B of Application FTA368).
 - **Pre-substantive Application Engagement:** conferencing with applicant's economist (17/12/2025) on economic matters to be addressed in the substantive application.
 - **Substantive Application Review:** review of economic assessment report (Appendix B12.4.4, 27 March 2026) and draft review 29 April provided to Auckland Council, which was shared with the application.
 - **Post-substantive Application Engagement:** conferencing with applicant's economist (20/05/2025) on economic matters to be addressed, set of actions, and peer-review of aspects of the applicants economic modelling.
 - **Updated Substantive Application:** review of the updated economic assessment report (22 May 2026) and examination of updated modelling of avoided emissions and social costs.
 - **Updated-substantive Application Engagement:** emails and discussions with applicant's economist 17-30 June 2026 on outstanding issues and examination of total resource value, and
 - **Finalised Substantive Application review:** provided final review to Auckland Council.
- The Economic Assessment highlights the importance of aggregates as essential inputs to the economy, particularly for infrastructure (e.g. roading) and construction industry. Due to their heavy and bulky nature, aggregate is costly to transport between locations and across regions. I agree that these are the primary economic issues arising from the Hunua Quarry Expansion.
- The Economic Assessment assesses the demand and supply of aggregates in the Auckland region and identifies a shortfall. It considers that this deficit is likely met through imports from Waikato (Smythes Quarry) and Northland (Maungaturoto Quarry), which could in part be supplied if Hunua Quarry Expansion is developed. While I acknowledge that a supply shortfall may exist in the region, the methodology used to estimate demand relies on a simple demand estimate using per capita assumption rather than modelling the key drivers of demand for aggregates, such as infrastructure investments and construction activity. As a result, the estimated shortfall may be overstated. This gap in data and modelling is acknowledged by the applicant's economist, and there is agreement that it would be difficult to apply a more robust estimation method.
- The increase in quarry operational and construction activities arising from the proposal were previously described as "significant" in the Economic Assessments and the revised assessment has removed this description. There is agreement that the quarry operational and construction activities arising from the

proposal are important in Auckland, however not regionally or nationally significant, as required under the FTAA.

- However, the Economic Assessment also quantifies the benefits from avoided haulage costs (reductions in transport costs, social harm, and emissions) from supplying aggregate from within the region as opposed to from outside the region, and concludes that these alone are regionally significant (avoided costs estimated at \$663m to \$853m, depending on the location of the alternative source and the Hunua future production profile). I have been able to replicate much of the assessment and I agree that the scale of these benefits is likely to be regionally significant as required in criteria s22(1)(a) of FTAA.
- Additionally the Economic Assessment notes wider economic benefits, and I agree that there will be some. However, I consider that most of these benefits are likely to be small, and the Economic Assessment has not provided evidence to support them being important or significant.
- The Economic Assessment does not quantify costs, instead relying on other technical experts to address potential adverse effects (including noise, dust, environmental impacts, and other externalities). It is noted that approximately 38 dwellings are located in close proximity to the site and may experience some level of impact, with mitigation measures proposed to minimise these effects. While it would be feasible to quantify these costs using economic methods, it is likely that such costs would be relatively small and unlikely to be out of proportion to the regional benefits identified. Therefore, in my opinion, they are unlikely to meet the threshold for declining the project under s85(3)(b) of the FTAA.
- In conclusion, the methodology has been updated to address most of the issues raised in my previous reviews. While the total quantified benefits have reduced in the final assessment, they remain regionally significant. Based on the information available, it is likely that the benefits of the proposal would substantially exceed its costs. Taken together, these factors indicate that the proposal is consistent with the purpose of the FTAA, and I therefore support the development on economic grounds.

4.0 Documents Reviewed

The following documents have been reviewed in preparing this memorandum:

- Economic Assessment Response Updated - Market Economics, 22 May 2026.
- Appendix B12.4.4: Economic Assessment - Market Economics, 27 March 2026.
- Appendix B: Hunua Quarry – Winstone Aggregates High Level Assessment of Economic Affects for Fast-track Approval – Market Economics, 3 May 2024.
- Assessment of Environmental Effects - Boffa Miskell Limited, 30 March 2026.
- Appendix B12.4.1: Air Quality Assessment - PDP, March 2026.
- Appendix B12.4.5: Ecological Assessment - Boffa Miskell Limited, 28 March 2026.
- Appendix B12.4.11: Acoustics and Vibration Assessment - Styles Group, 23 March 2026.
- Appendix B12.4.12: Hunua Quarry Expansion Resource Report - Winstone Aggregates, 26 March 2026.
- Appendix B12.4.14: Transportation Assessment - Commute, 26 March 2026.

5.0 Additional Reasons for Consent Not included in AEE / Incorrect Reasons for Consent

Nil.

6.0 Specialist Assessment

Economic Outcomes

This review focuses on the updated Market Economics report *Economic Assessment Response Updated (Economic Assessment)* which covers the economic issues associated with the proposed quarry (**Hunua Quarry Expansion**). For ease of comparison, this response follows the same structure as the Economic Assessment. Where relevant, this response also references information contained within other technical expert assessments and the Assessment of Environmental Effects (AEE).

In summary, I consider that the Hunua Quarry Expansion is likely to result in a net positive economic outcome if approved under the FTAA process. In relation to the FTAA requirements, I consider that the proposal will likely be regionally significant due to the scale of benefits associated with the avoidance of transporting aggregates into the Auckland region, which is likely to be material in the regional context.

While the applicant's economist agrees with my view that certain components of the project such as the quarry construction, operation and wider benefits are not regionally significant when considered in isolation, there is agreement that the development is likely to be regionally significant when assessed as an integrated whole.

1. Market Context (Section 3)

Broadly, I agree with the points raised in the Market Context section of the Economic Assessment. Aggregate demand is primarily driven by construction activity, including roads, infrastructure, and residential, commercial, and industrial development. Moreover, aggregate is largely non-substitutable and has a low value-to-weight ratio, meaning that transport distance is a key determinant of its total cost and consumption patterns.

The supply of aggregate is relatively inelastic in the short to medium term, as new resources can take time to develop, including land acquisition, resource consenting, extraction equipment, and processing facilities.¹ There are a limited number of suppliers in the Auckland region, which suggests that demand may exceed regional supply, with aggregate potentially being imported from regions such as Northland and Waikato. Hunua Quarry has been a major supplier of aggregate over the last 100 years and the quarry is proximate to southern growth areas and SH1. That accessibility is a strong positive feature of the proposal.

2. Aggregate Demand and Supply (Section 4)

The Economic Assessment outlines the available supply and demand data for aggregate, as well as known limitations in the underlying data. It estimates supply across the upper North Island and New Zealand, while accounting for a "known undercount". It identifies the primary drivers of demand as construction activity, including new housing, infrastructure investment and renewals, and commercial and industrial development. It also presents supporting data, including residential building consents and government infrastructure investment.

¹ The Economic Assessment correctly notes that there have been a number of other recent consents that have increased aggregate supply in Auckland (Brookby, Sutton Block Expansion, and Kings Quarry Stage 2). These consents were granted via various Fast Track processes, and therefore do not undermine the proposition that supply is relatively inelastic.

The Economic Assessment then estimates future demand and supply as follows:

- Demand is estimated by applying an assumed per capita consumption rate of 9.1 tonnes to the medium and high Stats NZ population projections; and
- Supply is estimated based on 2025 supply levels, plus recently consented capacity.

On this basis, the assessment indicates a potential supply shortfall both currently and in the future, ranging from approximately 1.2-1.7m tonnes in 2026 to 6.2-9m tonnes by 2055. The Economic Assessment notes that this gap will be met through imports from neighbouring regions, principally Waikato. The assessment also notes that the regional differences in price of aggregate and the recent steps by Auckland quarry owners to progress applications to increase capacity signal that there is a shortfall and hence a need for more supply.

First, I agree that there are limitations associated with the available data, which make robust assessment of aggregate supply and demand challenging. In particular, it is not possible to definitively determine whether a supply shortfall exists in the Auckland region, the extent of any such shortfall, or the source and scale of aggregate imports.

Second, I agree that there are three primary drivers of aggregate demand: new housing, infrastructure investment and renewals, and commercial and industrial development. Furthermore, the Waka Kotahi (2022) study² of aggregate supply and demand in New Zealand, which is directly referenced in the Economic Assessment, indicates that demand is more appropriately modelled using growth-based metrics, such as road investment expenditure, population growth rates, and GDP.

However, the Economic Assessment utilises total population as the basis for estimating demand, despite acknowledging elsewhere that aggregate demand is closely linked to growth-related activity and providing growth related data (building consents, infrastructure spend). The use of a per capita approach risks overstating demand associated with the existing population, while understating demand arising from growth. Overall, the assessment is primarily driven by level-based indicators (i.e. total population) rather than change-based indicators (e.g. growth in population). This is because the majority of the projected future population (approximately two-thirds) comprises the existing population, which has a relatively limited influence on incremental aggregate demand. In contrast, growth is a smaller share of the population, but accounts for a disproportionate share of demand, as it drives new housing, infrastructure, and associated construction activity. The level-based assumption of 9.1 tonnes per capita is not supported by evidence in the assessment or the literature.

Furthermore, I note that the Economic Assessment does not utilise the product mix data provided in the application. Importantly, output from Hunua Quarry, and the projected resource from the expansion, is used predominantly for roading purposes (approximately 73% and 75%, respectively).³ The nature of the resource therefore suggests that only a relatively small proportion is associated with residential construction (approximately 15%). Accordingly, demand for aggregate from the Hunua Quarry Expansion is likely to be more closely linked to infrastructure investment than to residential development, although infrastructure investment is to some extent driven by population growth. This distinction has not been explicitly incorporated into the demand projections presented in the Economic Assessment.

I consider that there is a high probability that demand is not well represented by the per capita assumption used in the Economic Assessment. As a result, actual demand may be either higher or lower than estimated in the Economic Assessment, with corresponding implications for the magnitude of the regional shortfall. However, I acknowledge that other indicators, such as price signals and revealed preferences, suggest that a supply shortfall may exist.

Furthermore, I accept the applicant's economist's position, as raised during the second engagement meeting, that it would be difficult to reliably establish demand based on a list of major infrastructure, roading, or housing development projects. I also acknowledge that, although the product mix data presented in the application is largely based on product for roading projects, the aggregate produced could potentially be used across a range of alternative construction and infrastructure applications.

Third, I have not undertaken a detailed review of the supply estimates and therefore I accept that the Economic Assessment has relied on the best available data, including information from recently granted consents. I also accept that some aggregate may be imported into the Auckland region.

3. Economic Effects of the Project (Section 5)

The Economic Assessment sets out a baseline counterfactual and three alternative scenarios to assess the economic benefits of the Hunua Quarry Expansion (on-site, benefits of avoided haulage, and wider benefits). This framework enables the identification of both gross benefits and net benefits, with the latter measured relative to the baseline counterfactual. In Section 5, the following scenarios are adopted:

- **Counterfactual:** Hunua Quarry is assumed to produce 2.7m tonnes each year until 2039, when the existing resource consent expires. Thereafter, no further production and the market is assumed to import an equivalent volume of aggregate from outside the region.
- **Alternatives:** three production scenarios are defined (Low, Mid, and High) and are described as conservative. The Low scenario assumes a modest increase in production to 2.8m tonnes per annum, representing approximately a 3% increase on current production. The High scenario assumes a "modest step increase on historic levels", with production reaching 3.66m tonnes per annum, representing an increase of approximately 35%. The Mid scenario assumes a production level between the Low and High scenarios.

The report assumes that a total production of 225m tonnes over 80 year period could be produced, which is consistent with the applicant's assessment of the resource.⁴

The Economic Assessment identifies Hunua Quarry as a significant economic entity and estimates the on-site operational and construction activity associated with the proposed expansion (subsection 5.3). Under the counterfactual, current operations are assumed to continue until 2039, when the existing resource consent expires. Under the alternative scenarios, operations are assumed to continue beyond 2039, with a modest increase in production. This is consistent with other material in the application, "there would be about a 10% increase in staff, more automation would also be brought in over time so the numbers would be near static"⁵. In addition, a small amount of construction activity is assumed to occur each year as the resource is progressively developed.

The update assessment now adopts a commercial discount rate of 8%, and estimates an increase in activity (associated with the Hunua Quarry Expansion) to be an average GDP of \$1.7m per annum in the Auckland region

² Wilson, D., Sharp, B., Sheng, M. S., Sreenivasan, A., Kieu, M., & Ivory, V. (2022). Aggregate supply and demand in New Zealand (Waka Kotahi NZ Transport Agency research report 693).

³ Appendix B12.4.14: Transportation Assessment - Commute (Figure 7 Increase in Quarry Production and Truck Movements).

⁴ Appendix B12.4.12: Hunua Quarry Expansion Resource Report - Winstone Aggregates (page 12).

⁵ Appendix B12.4.14: Transportation Assessment – Commute (page 11).

(equivalent to \$132m over an 80-year period). This is estimated to support approximately 80 jobs per year, or around 6,219 job-years over the same period.

The Economic Assessment then quantifies the benefits associated with avoided haulage (subsection 5.4). The key assumption is that, in the absence of the Hunua Quarry Expansion, aggregate would be sourced from outside the region, resulting in longer transport distances and therefore higher transportation costs, as well as increased social harm, and air emissions. These effects are generally estimated using standard metrics drawn from government transport policy appraisal guidelines, and a 5% discount rate is applied. The primary assumptions not directly derived from publicly available data relate to the transport cost per tonne-kilometre, estimated at \$0.38–\$0.55, and the delivery locations (East Tāmaki, Penrose, Papakura, and Drury).

Subsection 5.5 presents a separate calculation of the gross output value of the aggregate, based on a total yield of 225m tonnes over the 80-year period, multiplied by an average price of \$24.12 per tonne. This results in an undiscounted total value of approximately \$5.4b over the period.

Subsection 5.6 provides an assessment of on-site efficiency gains arising from changes to the layout and elevation of the processing circuit, estimated at \$0.4m per annum over the 80 year period (i.e. PV of \$31m).

Finally, Subsection 5.7 provides a qualitative discussion of wider economic benefits, including supply chain resilience, increased competition in the market, continuity of supply, alignment with government policy, and the enabling role of aggregate supply for other sectors of the economy.

The assessment also concludes that there are no significant adverse economic effects, noting that approximately 38 dwellings are located in close proximity to the quarry and that mitigation measures are proposed to minimise potential impacts. It further relies on other technical experts to assess and address these costs.

First, I generally agree with the counterfactual and the three scenarios applied in the assessment. While there may be alternative sources of aggregate supply within the Auckland region, I consider it would be impractical for the applicant to assess all such options in detail. In addition, the scenarios and assessment extend over an 80-year period, whereas the regional consent period is 35 years. I agree with the focus on the longer-term horizon for analytical purposes, alongside the provision of results for the shorter consent period. I agree that the scenarios adopted are reasonable, and it is possible that quarry production could be higher if demand increases, meaning that the associated assessment may be conservative, as described in the Economic Assessment.

Second, I consider that the on-site operation and construction that will be enabled by Hunua Quarry Expansion will be relatively small and not significant at the regional or national level as required in s22(1)(a) of FTAA. The applicant's economist has agreed that this activity is not significant at the regional level, and has revised the Economic Assessment to record that operation and construction is not significant in the context of the FTAA requirements.

Third, I have been able to replicate most of the results presented in the avoided haulage costs assessment and I broadly agree with the method applied. However, I note the following aspects that should be considered:

- A discount rate of 5% is reasonable, as these avoided costs reflect public externalities that primarily accrue to parties not directly involved in the trade of aggregate.
- Transport cost assumptions applied (cost per tonne-kilometre of \$0.38–\$0.55) are higher than those reported in some of the literature. However, I agree that given current conditions including elevated diesel prices, these costs may be reasonable and potentially conservative. It would be beneficial if sensitivity testing in the Economic Assessment included a range of transport cost assumptions around the central value

adopted in the body of the report (which may be approximately $\pm 10\%$ of the current results). Action from engagement was that the applicant's economist would add short discussion about impact of benefits with a different price, which was included for higher prices. Also to include sensitivity results in the appendix, which was not actioned. I consider that it would have been informative to include both lower and higher price scenarios within the sensitivity testing. It is likely that adoption of a lower fuel price assumption would have reduced the estimated benefits, however the benefits may well still be of regional significance. Including a lower-bound scenario would provide greater assurance to decision-makers that the overall findings of the assessment are not unduly sensitive to this key assumption.

- Truck load weight is assumed to be 30 tonnes which is lower than the actual value (2023 of 40 tonnes) and anticipated (35 tonnes), as reported in the transport assessment.⁶ If the actual or anticipated loads were applied then avoided costs decrease by 2% to 4%. The applicant's economist has undertaken new sensitivity assessment and confirmed that higher (or lower) truck loading assumptions would result in only minor changes to travel costs which match my estimations. This new finding in the revised report is consistent with and supports, my proposition that the assessment results are not materially sensitive to the truck loading assumptions adopted.
- Delivery locations are set as East Tāmaki, Penrose, Papakura, and Drury based on "recent history". I am unable to verify the reasonableness of this assumption or the proportional allocation of demand used in the Economic Assessment. However, I note that most of Auckland is closer to Hunua Quarry than to either Maungaturoto Quarry or Smythes Quarry, which means that alternative delivery location assumptions would still generally result in reduced haulage distances and associated avoided transport costs. This conclusion would only change materially if a significant share of demand were located north of Silverdale, which in my view is unlikely.
- Social costs in the previous report were not calculated consistently. These calculations have since been revised, and the results presented in the updated report align with my expectations.
- The emissions cost calculations in the previous report could not be fully replicated using the information provided. The applicant's economist subsequently including the assumptions used, supplied the underlying model and workings for review. Following that review, several corrections were made, and I am satisfied that the revised results now reflect my expectations.

I consider the approach to be reasonable and overall magnitude of the estimated benefits are likely to be regionally significant.

Fourth, the previous Economic Assessment incorrectly estimated the gross output value of the resource as being worth \$6.4b. In the revised report, the total resource is updated to 225 million tonnes, which is now consistent with the resource report⁷, and gives a value of \$5.4b. Moreover, the applicant's economist has acknowledged that this is a hypothetical value, as it would be physically unachievable to extract this resource in one year and impossible to find enough customers to sell this volume on the market.

Moreover, the applicant's economist has confirmed that the total resource of 255 million tonnes includes the resource currently authorised under the existing consent and has provided the data used to estimate its value. It is incorrect to include the value of resource that can be extracted under the existing consent, as this overstates the value attributable to the FTAA approval. Based on the applicant's own data, the value of the currently consented

⁶ Appendix B12.4.14: Transportation Assessment - Commute (Figure 7 Increase in Quarry Production and Truck Movements).

⁷ Appendix B12.4.12: Hunua Quarry Expansion Resource Report - Winstone Aggregates (page 12).

resource is \$777.8m. This amount should therefore be excluded from the assessment, as this resource can be extracted regardless of the outcome of the FTAA application.

Therefore, the value needs to be discounted to account for the fact that the resource can only be extracted and sold to customers over time and the existing resource should not be counted as it can be extracted regardless of the FTAA application. I have used the data provided by the applicant's economist and applied a discount rate of 8%, which is appropriate for a purely commercial activity such as the aggregate sale by a private operator. This results in a gross output present value of approximately \$365m under the mid scenario.

That is substantially lower (by approximately 93%) than the reported value of \$5.4b, which is important given that this figure is a key result referenced in the conclusion, executive summary, and the AEE. Critically, the applicant's economist has agreed and revised the report to acknowledge that this value is **already captured** within the operational assessment, which includes gross output. As such, this subsection effectively **double counts** the same benefit and should not be considered as a separate benefit.

Fifth, the on-site efficiency gains arising from changes to the layout and elevation of the processing circuit represent a private benefit and, at \$0.4m per annum, are relatively modest. I consider that these benefits should already be captured within the operational assessment, and their separate inclusion does not add value to the understanding of the projects benefits, and risks double counting. The applicant's economist has agreed and revised the report to acknowledge this benefit is already included in the operational assessment.

Finally, the Economic Assessment does not quantify the potential costs associated with the Hunua Quarry Expansion. While it acknowledges that there are 38 dwellings in close proximity that may be affected by noise, dust, and vehicle movements, and that there may be environmental effects, these impacts are not quantified.

In my view, it would be relatively straightforward to quantify at least some of these externalities using established metrics from government transport appraisal guidance (for example, noise effects from site operations and associated traffic relative to nearby sensitive receptors). Similarly, ecological impacts could be estimated using values derived from existing research (e.g. contingent valuation and other stated preference methods). Notwithstanding this, given the relatively small number of affected dwellings (38) and the limited area of land involved (44.6 hectares), together with proposed mitigation measures, I would expect that quantified costs would be modest and unlikely to outweigh the estimated benefits.

4. Statutory assessment (Section 6)

The Economic Assessment concludes that the Hunua Quarry Expansion delivers significant regional economic benefits to Auckland (as required in the FTAA 2024), primarily through avoided haulage (transport, emissions, and social costs) associated with sourcing aggregate from more distant locations such as Waikato and Northland. These avoided costs are material at a regional scale and are likely conservative, as the absence of Hunua Quarry would increase construction and infrastructure costs due to reliance on more remote supply. The Project also aligns with the Government's growth and infrastructure objectives and contributes positively to climate change mitigation by reducing haul distances, fuel use, and associated emissions over the life of the consent.

I agree that Hunua Quarry Expansion is likely to deliver significant regional economic benefits from the avoided haulage, which is consistent with the FTAA requirement. I note that the Economic Assessment does not mention the other benefits, and the implication is that those other benefits are not by themselves regionally significant. I agree

that those other benefits (i.e. on-site operation, quarry construction, and other wider benefits), by themselves are unlikely to be regionally significant, but I acknowledge that they will be positive.

The Economic Assessment does not provide an explicit conclusion in relation to s85(3)(b) of the FTAA as to whether costs are out of proportion to the regional benefits. This is likely because the Economic Assessment did not quantify the potential costs, instead relying on separate technical reports to address adverse effects such as noise, dust, environmental impacts, and other externalities. While it would be feasible to quantify these costs using standard economic valuation methods, it is expected that such costs would be relatively small in scale and unlikely to be disproportionate to the regional benefits identified. On this basis, in my opinion, the Hunua Quarry Expansion would not be likely to meet the threshold for decline under s85(3)(b) of the FTAA.

5. Conclusion (Section 7)

I generally agree with the conclusions set out in the Economic Assessment, except where I have identified differences in this review. Broadly, while I do not agree with every aspect of the methodology adopted, I consider that the Hunua Quarry Expansion would likely generate regionally significant economic benefit (s22(1)(a) of FTAA). I also consider it likely that if the economic costs were fully quantified they would be smaller than the estimated benefits. On this basis, the overall economic outcome would be positive for the community and wider society (s85(3)(b) of FTAA).

7.0 Section 67 Information Gap

No information gaps have been identified.

8.0 Recommendation

The application would be more complete if the applicant had quantified the costs and compared them to the benefits of the proposal through a cost–benefit analysis. This would enable decision-makers to have greater confidence that all relevant impacts have been systematically identified and assessed, and that the proposal would deliver a positive outcome for the region.

9.0 Proposed Conditions

The proposed conditions of consent are not within the scope of my assessment, and I therefore make no comment on them.

10.0 Supporting Documents

Detail is provided in the footnotes to Section 6.0 of this memo.