



15 JUN 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0033216

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on referral application Clevedon Quarry Expansion, FTAA-2605-1228. I am providing comment in my capacity as Minister for Economic Growth, focusing on whether the application is likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided.

Clevedon Quarry Expansion, FTAA-2605-1228

The proposal is to expand the existing Clevedon Quarry in south-east Auckland to enable continued aggregate extraction and long-term supply to the Auckland market. The expansion would increase the total aggregate resource from 60 million tonnes to 150 million tonnes over a 50-year period.

The application's economic assessment identifies Auckland as facing a structural aggregate supply deficit, with increasing reliance on imported aggregate from neighbouring regions. According to the assessment, aggregate demand in Auckland is projected to increase from 16.2 million tonnes in 2025 to 22.2 million tonnes by 2055. Sourcing aggregate locally from Clevedon Quarry, rather than comparator quarries in Waikato or Northland, could avoid significant long-term transport, emissions and social costs. The present value of avoided costs is estimated at between \$50 million to \$150 million using standard discount rate assumptions.

The broader benefits relate to maintaining regionally significant aggregate supply capacity that supports ongoing infrastructure and construction activity and reduces future cost pressures associated with importing aggregate into Auckland. The proposal also appears likely to support the continued functioning of regionally significant infrastructure and development activity in Auckland over the medium to long term.

On this basis and having regard to the information provided by the applicant, the proposal may be assessed as having the potential to deliver significant regional economic benefits under section 22(2)(a)(iv) of the Fast-track Approvals Act.

Yours sincerely

Hon Nicola Willis
Minister for Economic Growth

Hon Shane Jones

Minister for Oceans and Fisheries
Minister for Regional Development
Minister for Resources
Associate Minister of Finance
Associate Minister for Energy



10 June 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act 2024 – Clevedon Quarry Expansion application (FTAA-2605-1228)

Dear Chris,

Thank you for the opportunity to comment on this referral application under the Fast-track Approvals Act 2024 (FTAA 2024).

The FTAA 2024 has been established to provide a regime that makes it easier and quicker for regionally and nationally significant projects to gain the approvals needed for development, in support of this Government's economic growth objectives.

I have considered the application and its alignment with the priorities of my Resources portfolio. My comments are attached as Annex One.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'S. Jones'.

Hon Shane Jones
Minister for Resources

Annex One – Resources comments

Project overview

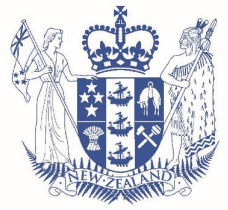
1. The applicant, Stevenson Aggregates Limited (Stevenson) has applied for Fast Track approval for its proposed Clevedon Quarry Expansion project. The project entails the staged increase in aggregate resource at the existing Clevedon Quarry in the Auckland Region by an additional estimated 90 million tonnes (MT). The project provides for this resource to be extracted over a period of up to 50 years, at up to 3 MT annually.
2. The project would expand the existing quarry, which is already consented for the extraction of up to 3 MT annually for 20 years, to a 50-year life-of-quarry. Current production is approximately 200,000-300,000 tonnes per annum.
3. The area to be disturbed and rehabilitated in stages by the quarry over the 50-year lifetime of the project is expected to be approximately 75 hectares. The expansion would be similar in many aspects to the existing consents, including annual production rate, operational methodology of opencast mining, processing method, truck movements, and operating hours.

Resources comments

4. The Government's Minerals Strategy, published in January 2025 sets a long-term, strategic approach to how we develop our mineral resources. The Minerals Strategy emphasises the production of aggregate, including greywacke, such as that from the Clevedon Quarry, as strategically important and the building block for our infrastructure and housing needs.
5. Access to long-term sources of aggregate may provide certainty to infrastructure planners, and support New Zealand's significant infrastructure pipeline, especially in the Auckland Region, as well as the Government's Going for Growth and Going for Housing Growth strategies. Greywacke aggregate is used in the production of concrete and in road construction. The Aggregate and Quarry Association estimate that on average, each new house requires approximately 250 tonnes of aggregate, and that construction of one kilometre of a two-lane highway requires approximately 14,000 tonnes of construction aggregate.
6. Aggregate is listed as one of New Zealand's critical minerals. This is due to the high level of economic importance of aggregate to New Zealand, and the regulatory constraints limiting new supply opportunities. It is important that quarries be located near demand centres, such as Auckland, our largest demand centre; a common industry short-hand estimate is that the cost of aggregate doubles after the first 30 kilometre it is transported.
7. Stevenson provided an estimate of the present value of avoided transport, emissions and social costs (arising from road injuries and fatalities) of sourcing aggregate from Clevedon Quarry compared to competitor quarries in Waikato and Northland, over the 30-year extension. Stevenson estimated the avoided costs at \$50.1 million to \$155.5 million at an 8 per cent discount rate, and \$489.2 million to \$1.5 billion at a 2 per cent discount rate.

Hon James Meager

Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport



11 June 2026

JMITC-55

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
WELLINGTON

By email: infrastructure.portfolio@parliament.govt.nz

Invitation to comment on the Clevedon Quarry Expansion project under the Fast-track Approvals Act 2024

Tēnā koe Minister Bishop,

Thank you for the invitation to comment on the **Clevedon Quarry Expansion** project under section 17 of the Fast-track Approvals Act 2024. You requested comment from Hon Tama Potaka as Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development. I am responding as Acting Minister of those portfolios.

I have considered the application and its alignment with my portfolios as Acting Minister for Māori Crown Relations: Te Arawhiti and Acting Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report prepared by the Ministry for the Environment.

Nāku noa, nā

A stylized blue ink signature of Hon James Meager.

Hon James Meager

Acting Minister for Māori Crown Relations: Te Arawhiti
Acting Minister for Māori Development

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Clevedon Quarry Expansion
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Auckland Council		
*First name	Douglas		
*Last name	Fletcher		
Postal address	Auckland Council, 135 Alber Street, Auckland		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



**Principal Project Lead, Premium Unit
Planning and Resource Consents**

Auckland Council

Date 15.06.2026

Appendix A – Project summary details

Application number	FTAA-2605-1228
Project name	Clevedon Quarry Expansion
Applicant name	Stevenson Aggregates Limited
Project summary details	The project is to, in stages, increase the aggregate resource at Clevedon Quarry from 60 million tonnes (MT) to approximately 150 MT, and provide for this resource to be extracted over a period of up to 50-years. The proposal involves expanding the quarry in five stages across an area of approximately 75 ha. The floor will remain unchanged from Reduced Level (RL) 20 m for each stage. No changes are proposed to the current consented annual extraction limit of 3 MT per year. The expansion would extend the current quarry at 546 McNicol Road south-eastward into 646 McNicol Road and 439 Otau Mountain Road, Auckland. The applicant seeks the following approvals through the fast-track approvals process to authorise the project a. Resource consents under the Resource Management Act 1991 i. Resource consents under the Auckland Unitary Plan – Operative in Part (AUP) ii. Resource consents under the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F) iii. variations to two existing land use resource consents held by the applicant b. Approvals under the Wildlife Act 1953.

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Clevedon Quarry Expansion (Stevenson Aggregates Limited)
Address	546 McNicol Road, Clevedon
FT application number	PRR00044143 (FTAA2605-1228)

Respondent Information

Name	Amanda Hopkins
Role	Franklin Local Board Lead – Fast Track Applications
Agency / Department	Franklin Local Board – Auckland Council
Date	5 June 2025

Do you support the proposal proceeding through fast-track?

- ☐ Support
☐ Oppose
☒ Neutral

Agency/Department Response

The Franklin Local Board commends the applicant for their continuing engagement with the local community and their ongoing support for local projects.

The Board acknowledges that the applicant is not increasing their consented truck numbers and hours of operation but is increasing and extending the quantity of rock to be taken and the years of operation.

The Board continues to be concerned that the roads around the quarry are not suitable and safe for high numbers of heavy truck movements. Traffic numbers will continue to increase with the developments and growth in Clevedon and surrounding areas. There are safety issues in particular with the following:

- a one lane bridge on Tourist Road with limited space for pedestrians and cyclists
- the intersection of Tourist Road with Monument Road
- the complex intersection of Tourist Road with Creightons Road and Papakura-Clevedon Road

- Ardmore Primary School, which has a limited drop off / pick up space on the main Papakura-Clevedon Road when most children arrive at and leave school by car.

These safety issues continue to be of significant concern to the community and Local Board. The intersections mentioned above have high DSI numbers. Although the Ardmore School (Ministry of Education) has been encouraged by the Local Board to purchase the Council land adjacent to the school adjoining Burnside Road to enable safer access to the school, they have yet to do so and continue to use the Papakura Clevedon Road access. The Board would like to see safety improvements to mitigate these issues.

The Board would also encourage continued support for the Clevedon trails by the applicant.

While the Board's stance is neutral, it would like to see more mitigation on the roads.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Assessment Criteria (Section 22 FTA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?
- Would referring the project facilitate its delivery in a more timely and cost-effective way?
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
- Has the project been identified as a priority in any government or sector plan or strategy?
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
- Will the project increase housing supply or contribute to a well-functioning urban environment?
- Will the project deliver significant economic benefits?
- Will the project support primary industries (e.g., aquaculture)?
- Will the project support development of natural resources (e.g., minerals, petroleum)?
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
- Will the project support climate change adaptation or recovery from natural hazard events?
- Will the project address significant environmental issues?
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
- Are there any other relevant matters to consider?

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?

- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
- Is there the potential for significant adverse environmental effects to occur?

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Clevedon Quarry Expansion
Address	546 McNicol Road, Clevedon
FT application number	PRR00044143 (FTAA2605-1228)

Respondent Information

Name	Vaishali Sankar
Role	Senior Transport Planner
Agency / Department	Auckland Transport – Network Operations Planning
Date	10/06/2026

Do you support the proposal proceeding through fast-track?

- ☐ Support
☐ Oppose
☒ Neutral

Agency/Department Response

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Introduction

Thank you for the opportunity to comment on the fast-track consent referral for the staged quarry expansion, increasing total extraction from 60 million tonnes to 150 million tonnes over a 50-year period.

Auckland Transport (AT) has assessed the proposal and notes that there is no increase to the annual extraction limit of 3 million tonnes per year. Additionally, there are no proposed changes to operational parameters, including the approved maximum of 90 truck movements per hour or the hours of operation.

This memo outlines AT's high-level comments on the referral application. Based on the information provided, the proposal appears to offer limited regional transport benefits. Accordingly, AT is neutral as to whether the application proceeds through Fasttrack consenting pathway.

Should the project be accepted, AT notes that further information will be required to enable a detailed assessment of a substantive application. The matters outlined below highlight potential impacts that should be considered by the applicant and addressed in any subsequent application.

Relevant matters to consider

1. Existing Limitations on Operation of Quarry

As part of an appeal by Fulton Hogan Ltd in 2018 (Appeal - ENV-2018-AKL-000044 and ENV-2018-AKL-000046 for Consent - BUN60302442), the Environment Court imposed limitation on truck movements per day, hours of operation and temporary restriction on certain routes. These limitations have been outlined below:

The days and the hours of truck movements on the roads are limited to:

- Monday to Friday – 6.30am to 6pm
- Saturday – 6.30am to 1.00pm (excluding public holidays)

Truck movement numbers are limited to:

- Maximum of 90 truck movements per hour (Monday to Saturday) or not exceed an average of 900 truck movement per day, measure on a 12-month rolling basis.

The quarry currently operates under the conditions specified above.

2. Pavement and Asset Effects

AT's Pavement Engineer specialist considers there is a risk of accelerated pavement deterioration with the heavy vehicle loading and overall increase in period of extraction from initial 20 years that was approved to 50 years proposed. Accelerated pavement deterioration can lead to increased maintenance and repair costs for the Road Controlling Authority, reduced pavement service life, and increased safety risks for road users. Some intersection upgrades including pavement upgrades at 530 McNicol Road may be required for slow truck movements with braking / acceleration and turning movements. The

Environment Court had conditioned the sealing, upgrading and widening of McNicol Road from 530 McNicol Road to the quarry entrance (BUN60302442), it is unclear if this work has been undertaken by the applicant. In order to better understand the effects on McNicol Road and how it is functioning, AT requires further information from the applicant, such as a pavement impact analysis, to understand the pavement life compared to the design life and the anticipated effects.

3. Road Safety Effects

AT's Road Safety specialist has advised that McNicol Road currently presents a low collective risk. As the applicant is not proposing any increase in the existing trip generation limits, no additional inherent safety risk is anticipated on McNicol Road.

However, it is noted that the intersection of Papakura–Clevedon Road and Tourist Road have recorded seven crashes since 2020, five of which involved vehicles failing to give way. If quarry trucks are expected to utilise this intersection, additional care is recommended when undertaking turning movements.

4. Recommended Substantive Application Material

AT requests that, should the Project be accepted for the Fast Track consenting process, the full application material including a Traffic Report, should be referred to AT for review. The Traffic Report should include, but not be limited to the following:

- Details on whether the quarry site is currently operating and indication on when the sealing, widening and upgrading works will be undertaken on McNicol Road or if it has already been undertaken.
- Details on how compliance with the limitations on truck movements, timing, etc has been achieved.
- Information on the proposed construction methodology, including an assessment of construction and earthwork heavy vehicle-related trips. This should include:
 - A Draft Construction Traffic Management Plan (CTMP) covering an assessment of effects on construction traffic (including measures to maintain safe and efficient operation for all road users).
- A Pavement Impact Assessment, including video surveys of McNicol Road used by heavy vehicles, including the unsealed section between 530 McNicol Road and 546 McNicol Road.
 - Clarify if the section between 530 McNicol Road and 546 McNicol Road will be maintained by the applicant.
 - Undertake traffic survey on McNicol Road to indicate the latest traffic volumes.
- Details of how any potential adverse effects on the adjacent transport network will be managed, including the unsealed section.
- The road safety effects of the development on the wider network, including but not limiting to CAS assessment.
- Provide tracking curves for the proposed truck movements on McNicol Road, especially on the curves and access to the site.

- Clarification on whether all the transport related conditions, including the monitoring conditions under consent BUN60302442 will be retained as outlined in the existing consent order provided by Environment Court, dated 25 October 2018.

Conclusion

Should the Project be accepted for the Fast Track approvals process, AT requests that the full application material, including a traffic report, should be referred to AT for review.

Parks Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Clevedon Quarry Expansion
Address	546 McNicol Road / 646 McNicol Road / 439 Otau Mountain Road
FT application number	FTAA2605-1228 (PRR00044143)

Respondent Information

Name	Kirsty Smith
Role	Parks Planner
Agency / Department	Parks & Community Facilities, Auckland Council
Date	08/06/2026

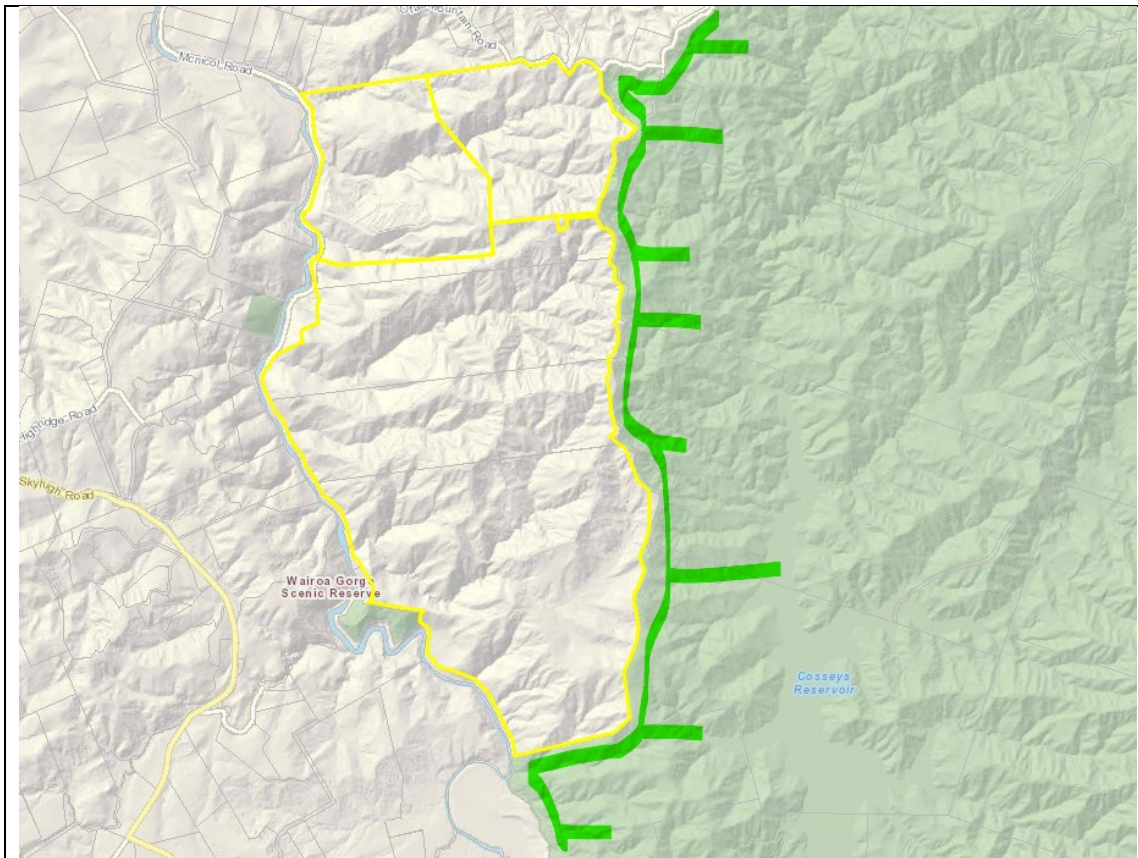
Do you support the proposal proceeding through fast-track?

- ☐ Support
☐ Oppose
☒ Neutral

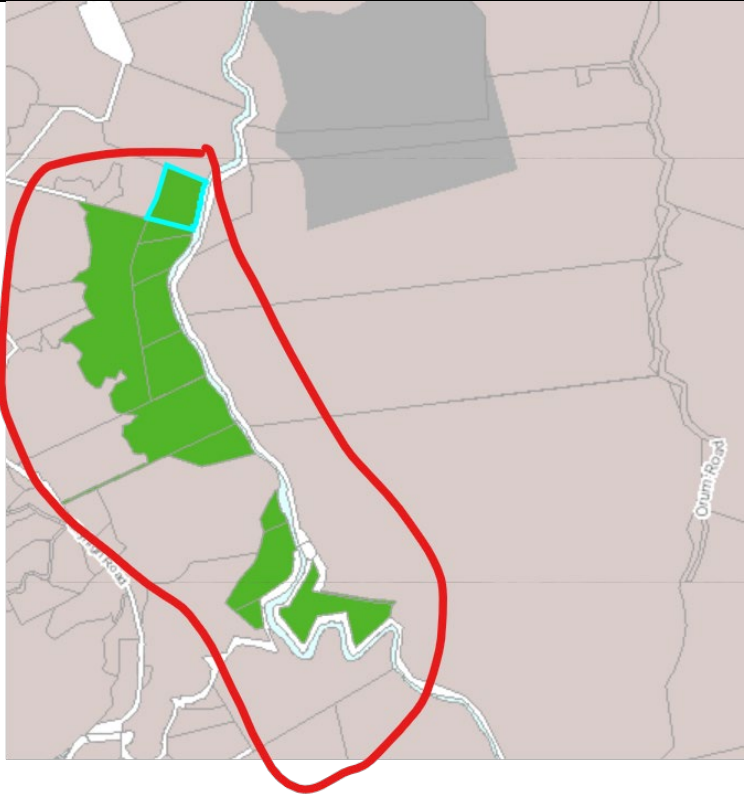
Agency/Department Response

The application site covers addresses: 546 McNicol Road / 646 McNicol Road / 439 Otau Mountain Road
 Zoning: Rural - Rural Production Zone, Special Purpose - Quarry Zone.
 Overlays: SEA terrestrial, Natural Stream Management Areas, Wetland Management Areas, Outstanding Natural Features, Quarry Buffer Area.
 Controls: Macroinvertebrate Community Index

The subject site is adjacent to the Auckland Council regional Park Hunua Ranges to the east. Input has been received from Trent Taylor (Principle Ranger) on potential parks matters as they relate to this open space.



The subject site is also adjacent to other public open spaces including Mcnicol Road 661r, Mcnicol Road 860r, and Wairoa Gorge Scenic Reserve to the west. These open spaces are zoned open space – conservation owned by the crown and managed through the Department of Conservation. There is no management plan that council is aware of for this land, meaning its ownership is fully with DOC. Any effects on this land should be reviewed and provided comments from by DOC. Mr. Fletcher (Principal Project Lead, Auckland Council) has been informed of this.



Open space provision

The underlying zoning Rural Production Zone, Special Purpose - Quarry Zone do not require the provision of open space, landscape or amenity effects

As such, there are no concerns from an open space capacity or provision perspective in relation to this proposal.

Existing open space

There are currently no plans to expand the adjacent Hunua Ranges, however, the introduction of a recreation plan in the near future may increase the number of visitors to the western side of the reserve significantly. This needs to be considered when assessing possible effects on the reserve and its users.

- *Construction-Related effects* - The bulk of the Hunua Ranges is over the ridge on Orum Road. The impacts would be minimal in terms of noise and vibration. Consideration needs to be given to effects on conservation and how the Ranges will be protected during expansion of the quarry. Consideration also needs to be given to any effects from land disturbance with dust potentially settling within the open space.
- *Reverse sensitivity effects* – As public access to the west side of the open space is opened up in future there is potential for impacts of ongoing use of the quarry to users of the open space. It is important that the quarry expansion does not lead to constraints on the recreational activities undertaken in the reserve now and in future.
- *Conservation effects* – Hunua Ranges is a regional park with significant conservational values. There is potential for flora and fauna species from the open space to out move across the boundary and enter private land due to the conservation work

happening within the Ranges. It is important that consideration is given to biosecurity and how natives and pests can be kept in and out of the ranges retrospectively.

- *Access and vehicle movements* – Confirmation of what new vehicle movements will be created on roads adjacent to the reserve is required. It is important biosecurity and reverse sensitivity effects of any increase in movement on Orum Road are managed.

Offsetting

The referral application indicates offsetting in many instances throughout the application. An offset and/or compensation package is mentioned to be “detailed as part of the substantive application and will be encapsulated through proposed conditions of consent”. It should be noted that any offsetting that may be proposed on existing open space land owned by Auckland Council as a part of any package will not be supported by Parks and should be assessed outside any regulatory process as any works within Council owned land requires Land Owner Approval which is separate from the regulatory process.

Overall recommendations for consideration

- Address reverse sensitivity effects on users of the open space and conservation value through appropriate design responses and ongoing work management.
- Provide construction and environmental management plans including specific mitigation for impacts on adjacent open spaces and the conservation work occurring.
- Address mitigation of any dust effects on the use of the ranges during construction of each stage of expansion.
- Provide conformation and management plans for impacts from any increase in movement along Orum Road adjacent to the open space.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- Does the project have significant regional or national benefits?
Parks and Community Facilities have no relevant matters to advise on in this regard.
- Would referring the project facilitate its delivery in a more timely and cost-effective way?
Parks and Community Facilities have no relevant matters to advise on in this regard.
- Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?
Parks and Community Facilities have no relevant matters to advise on in this regard.
- Has the project been identified as a priority in any government or sector plan or strategy?
Parks and Community Facilities have no relevant matters to advise on in this regard.
- Will the project deliver new or support existing regionally/nationally significant infrastructure?
Parks and Community Facilities have no relevant matters to advise on in this regard.

- Will the project increase housing supply or contribute to a well-functioning urban environment?
Parks and Community Facilities have no relevant matters to advise on in this regard.
- Will the project deliver significant economic benefits?
Parks and Community Facilities have no relevant matters to advise on in this regard.
- Will the project support primary industries (e.g., aquaculture)?
Parks and Community Facilities have no relevant matters to advise on in this regard.
- Will the project support development of natural resources (e.g., minerals, petroleum)?
Parks and Community Facilities have no relevant matters to advise on in this regard.
- Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
Parks and Community Facilities have no relevant matters to advise on in this regard.
- Will the project support climate change adaptation or recovery from natural hazard events?
Parks and Community Facilities have no relevant matters to advise on in this regard.
- Will the project address significant environmental issues?
Parks and Community Facilities have no relevant matters to advise on in this regard.
- Is the project consistent with local or regional planning documents (e.g., spatial strategies)?
Parks and Community Facilities have no relevant matters to advise on in this regard.
- Are there any other relevant matters to consider?
Yes. See above section for further comments.

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?
From a Parks asset owner perspective, no clear inconsistency is identified. The applicable zoning provisions do not require open space provision, and the proposal does not generate recreation reserve demand.
- Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?
The site is outside Future Development Strategy growth areas; however, as the proposal is industrial-focused and does not create residential demand, no sequencing issue arises in relation to open space provision.
- Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?
From a Parks perspective, the proposed activity and development on the subject site may adversely affect the Council-owned reserve land Hunua Ranges, however the effects demonstrated at this stage in regard to noise and vibration are minimal where no new recreation reserve infrastructure is required. It is however uncertain what the effects resulting from additional traffic movements and dust would be on the existing reserve and an assessment of these matters would be required to establish its impact.
- Is there the potential for significant adverse environmental effects to occur?

From a Parks asset owner perspective, further information and an assessment regarding dust and traffic movements will be required to provide an assessment on the reserve in this regard.



Prepared by:

Kirsty Smith
Parks Planner
Parks and Community Facilities
Date: 08.06.2026



Parks Agency Lead release:

Hester Gerber
Manager Parks Planning
Parks and Community Facilities
Date: 08/06/2026

Review of Clevedon Quarry Expansion Economic Analysis

Tim Denne

DRAFT, 4th June 2026

1 Overview

ME has assessed the benefits of the project using a cost benefit analysis (CBA).¹ It compares the project (Clevedon Quarry expansion) against a counterfactual in which aggregates are transported to Auckland from elsewhere and the land is used for something else. The benefits are the net cost savings from the Quarry expansion, with the public costs of transport under the counterfactual exceeding the benefits of alternative land use under the different scenarios defined using different Auckland population growth rates and at different discount rates.

I consider the approach to analysis to be appropriate. However, I also consider there to be missing elements from the analysis and some details that are either insufficiently transparent for me to be confident in the assumptions or the results. I expand on this below.

2 Review

The analysis estimates the benefits of the quarry expansion from the reduction in costs of aggregate relative to shipping costs from elsewhere and the opportunity costs of land. The analysis of relative transport costs depends crucially on the demand for aggregate (and thus the quantity to be shipped or produced), the distances and the full costs of transport, including emissions. I review the different elements below.

2.1 Aggregate Demand

Demand for aggregate appears to have been estimated using a ratio to population, although the explanation is not clear.

- p12 states that *“The ratio used to estimate future aggregate demand is held constant and based on the number of jobs in the mining and construction sector relative to aggregate production.”* ME goes on to note that this may lead to an over-estimate of demand if quarries become more efficient.
- P26 (Section 3.2) notes that the population data are combined with aggregate production data *“to derive a per-capita use ratio. Establishing this ratio provides a useful basis for modelling future demand scenarios ...”*
- P28 (Section 3.3) states *“The link between population and economic growth is well documented, and similarly, the link between economic growth and aggregate demand*

¹ ME Consulting (2026) *Clevedon Quarry Expansion Economic Assessment*. Report prepared for Stevenson Aggregates.

is acknowledged. Population growth is therefore used as the main driver of aggregate demand when designing the scenarios” (emphasis added).

Despite these slightly differing statements, it appears that the ratio of historical production per capita is used. However, the actual ratio used is not presented. It can be back calculated using the data in ME’s Table 2-1 (projected population change in Auckland) and Table 3-6 (Auckland aggregate demand forecasts). The estimated ratio (tonnes per capita) is 9.3 tonnes per capita as shown in Table 1. Table 1 also shows that the analysis has been limited to two population growth scenarios (medium and high) and does not include the low growth scenario. This is not explained.

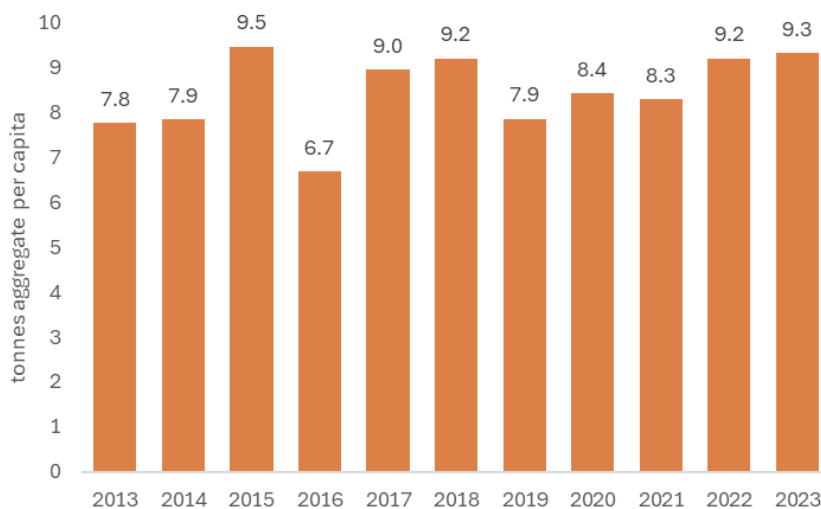
Table 1 Estimate of per capita aggregate demand

Population growth scenario	Population growth 2025-2053	Estimated additional growth to 2055	Population growth 2025-2055	Change in projected aggregate tonnes	Ratio (tonnes of aggregate per capita)
Low	338,200	22,422	360,622		
Medium	601,900	41,389	643,289	6.0	9.3
High	861,200	59,822	921,022	8.6	9.3

Source: population growth numbers to 2053 from Table 2-1, p5.; additional population growth to 2055 estimated using the same average annual growth from 2036-53 from Table 2-1; change in projected tonnes from Table 3-6, p29

There are no historical consumption data for aggregates, but ME summarise the production data for New Zealand and selected regions. The Auckland regional production data are not a useful estimate of demand because of the high level of imports. Instead, I have combined the population and production data for Auckland, Northland and Waikato to show the historical production rates in Figure 1. The projected future demand rate (9.3 t/capita) is higher than the historical average for the three regions but the same as the average for the last two years of production. The value is therefore reasonable, given the expectation of increased infrastructure spend suggested by ME.

Figure 1 Per capita aggregate production for Auckland, Northland and Waikato combined



Source: Calculated using historical population data from Table 3-3 (p27), including straight line growth to estimate missing years (data are provided for every two years only), and historical production data from Table 3-4.

Table 3-7 includes an estimate of the projected output gap, which compares demand to production from Auckland regional quarries. The text suggests the numbers are shown in more detail in Appendix 3, but those numbers are different. Table 3-7 seems consistent with the explanation in the main text.

2.2 Distances and Volumes

The distances for supply in the counterfactual have been calculated for Smythes Quarry in Waikato and Maungaturoto in Northland. The explanations seem reasonable. These have been used to calculate total distances to a weighted set of destinations. I have not analysed these in any detail.

The truck size and volume uses assumptions taken from the applicant (Stevenson Aggregates) and these are combined with a production volume at the Clevedon Quarry (330,000 t pa) to estimate the required number of annual trips (14,350 round trips) assuming no change in production levels. ME suggests an alternative estimate of 130,440 truck movements if the quarry extracted its consented limit of 3 million t pa. This seems to be a meaningless estimate as it would require a completely differently specified counterfactual of displaced production from quarries other than Clevedon.

2.3 Transport Costs

The main transport costs are sourced from the applicant. Presumably these include fuel, maintenance and depreciation costs, although this is not explained, and the costs per kilometre is not provided. In Table 2, I estimate the per kilometre transport, emissions and social costs (final three columns) by dividing the cost results provided by ME (in \$m in Table 4-4) with the kilometres estimated by multiplying the weighted average distance by quarry (from Table 4-1) with the 14,350 trips (Table 4-2).² The key thing to note is that there are significant differences in the per kilometre cost estimates (\$9.24/km for transport costs to Clevedon compared to \$3.55/km for Maungaturoto) which are not explained. This might be explainable as follows:

- transport costs – if the depreciation costs are annual and spread over different total kilometres (least for Clevedon and most for Maungaturoto); and
- emission costs – if there is a different weighting of urban and rural routes (noting the difference in per km rates as reported in the table on p37.

However, it is difficult to explain the high social cost for Clevedon (\$0.65/km) because the total cost per kilometre is only \$0.59/km and \$0.58/km for urban and rural travel respectively (see Table 4-3).³

Table 2 Estimates of per kilometre transport costs

Quarry	Distance per quarry (km)	Total km for 14,350 trips	Transport costs (\$m pa)	Emission costs (\$m pa)	Social costs (\$m pa)	Transport costs (\$/km)	Emission costs (\$/km)	Social costs (\$/km)
Clevedon	43	617,050	5.7	1.6	0.4	9.24	2.59	0.65
Smythes	108	1,549,800	8	3	0.9	5.16	1.94	0.58
Maungaturoto	271	3,888,850	13.8	4.7	2.3	3.55	1.21	0.59

Source: Table 4-1 (distance by quarry); Table 4-2 (14,350 trips pa); Table 4-4 (transport, emission and social costs pa)

² This provides a more detailed estimate of kilometres than is given in Table 4-4.

³ The final row in Table 4-3 is wrongly explained as \$/100 million km and is in fact \$/100km. So, for example, the cost per km in urban areas is (\$41.91 + \$9.00 + \$8.40)/100 = \$0.59

Greater transparency is needed in these calculations to improve confidence in the results.

The emission costs are calculated using the local pollutant emission costs (table on p37) and the greenhouse gas (GHG) emission costs using the Treasury's shadow price of carbon as included in CBAX. There may be some double counting in this calculation. The Treasury's shadow price represents the estimated marginal abatement cost of reducing GHGs to meet NZ's emission targets. It is the opportunity cost of another tonne of emissions as this is the estimated cost for the nation to be brought back into compliance and is thus a social cost of GHGs for the nation. However, this is already partially internalised via the emissions trading scheme (ETS) which applies to transport fuels and is included in the price of fuel and, presumably, the transport costs that were sourced from the applicant. More correctly the shadow price of carbon should have been adjusted downwards to only cover the non-internalised component. The current ETS cost per litre of fuel is set out in MBIE's weekly fuel price data (\$0.14/litre of diesel for the week labelled 29/5/2026).⁴

2.4 Opportunity Costs

The opportunity cost of land has been calculated based on the value of forestry as an alternative land use for 13.62 ha and an ecological service-based value for 6.7 ha. The forestry numbers and assumptions seem reasonable. The ecosystem services numbers uses a widely-used source, although it is not entirely clear how these have been applied – the text explains the per hectare values and then adds an incomplete sentence that reads “As this is applied from 2054 onwards.” I do not know and, in any case, is a very minor part of the calculation. Whether there is an offsetting change in land use at the quarry alternatives is not discussed.

2.5 Missing Costs

The analysis has not included any monetised assessment of other external costs of quarrying at Clevedon compared to other sites. These would include noise and dust. I do not know if these would be material in the analysis.

2.6 Discount Rates

The CBA uses two discount rates (2% and 8%) based on Treasury advice.⁵ The suggested rates are for non-commercial proposals (2%) and commercial proposals (8%). The explanation of these different categories is given in accompanying advice, which explains that the higher rate should be used to “*assess proposals with mainly commercial costs and benefits.*”⁶ This is not entirely clear, especially for a project such as this that has commercial cost savings in the form of fuel and other transport costs, alongside non-commercial cost savings from reduced emissions and lower crash probabilities. It is useful therefore to include both rates, noting that the impact on results is significant.

⁴ <https://www.mbie.govt.nz/building-and-energy/energy-and-natural-resources/energy-statistics-and-modelling/energy-statistics/weekly-fuel-price-monitoring>

⁵ <https://www.treasury.govt.nz/information-and-services/public-sector-leadership/guidance/reporting-financial/discount-rates>

⁶ Treasury Circular 2024/15, para 6 (www.treasury.govt.nz/sites/default/files/2024-10/treasury-circular-2024-15.pdf)

15 June 2026

FTAA2605-1228 – Clevedon Quarry Expansion

Auckland Council comments

Application number(s):	FTAA2605-1228
Auckland Council Reference:	PRR00044143
Project name:	Clevedon Quarry Expansion
Applicant name:	Stevenson Aggregates Limited
Address:	546 McNicol Road south-eastward into 646 McNicol Road and 439 Otau Mountain Road.
Proposed activity(s):	In stages, increase the aggregate resource at Clevedon Quarry from 60 million tonnes (MT) to approximately 150 MT, and provide for this resource to be extracted over a period of up to 50-years. The alternative staged expansion of Clevedon Quarry is to deliver additional resource access and a more efficient, practical quarry design than the 2018-approved design (consented via LUC60361560). The expansion would extend the current quarry at 546 McNicol Road south-eastward into 646 McNicol Road and 439 Otau Mountain Road (collectively referred to herein as ‘the site’). No changes are proposed to the current consented annual extraction limit of 3 MT per year, and there will be no increase to existing operational parameters such as truck movements or hours of operation.

Regarding section 17 – invitation to provide comment

1. Under section 17(3) of the Act and without limiting any general comments under subsection (1)(a), Auckland Council must provide comments advising on the following matters:

1. Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.
2. Relevant to regional councils only: In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections [124C\(1\)\(c\)](#) or [165Z](#) of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please provide written confirmation.

Response to 1.

- The site of the proposed referral application (546 McNicol Rd, 646 McNicol Rd and 439 Otau Mountain Rd) is currently not subject to any existing RMA resource consent applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged.
- In addition to the above, the Auckland Council Water Allocation team have confirmed that there is sufficient water available in the underlying Huna Wairoa Greywacke aquifer for the anticipated maximum groundwater diversion rate sought by the applicant (approximately 388 m³/day).

Response to 2.

- Auckland Council is a unitary authority responsible for both Regional and territorial (City and District Council) roles. Therefore, Auckland Council is required to respond to question 2.
- Auckland Council confirms there are not any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA.

2. Auckland Council may also provide other comments, but only if those comments are relevant to the application and the decision on the application that the Minister is required to make under section 21.

Auckland Council has received comments on this fast-track referral application from the Frankling Local Board, Auckland Transport, Auckland Council Parks, Auckland Council Monitoring, Watercare Services Limited, Healthy Waters; and Council Subject Matter Experts with expertise in Economics (see summaries below and their respective full comments in attachment 1).

Auckland Council confirms that it does not have any significant concerns with this referral application and therefore holds a neutral position in regard to whether this referral application is accepted for processing under Fast Track Legislation.

Auckland Council has not identified any reasons why this referral application should be declined under s21(5) of the Fast Track Act.

However, if this application is accepted by the Minister for processing under the Fast Track Approvals Act, Auckland Council has identified matters where the applicant can provide further details / information. The provision of this further information will enable a more detailed assessment at the time a substantive application is lodged. These further information suggestions are outlined below and expanded on in attachment 1.

Summary of written Comments provided by the Local Board.

Franklin Local Board

Amanda Hopkins has provided comments on the referral application on behalf of the Franklin Local Board (FLB). These can be viewed in full, in attachment 1.

The Franklin Local Board's stance on this proposal is neutral, but they have also confirmed they would like to see more mitigation to manage potential effects on the roads.

The Board continues to be concerned that the roads around the quarry are not suitable and safe for high numbers of heavy truck movements. Traffic numbers will continue to increase with the developments and growth in Clevedon and surrounding areas. The Board considers that there are safety issues, in particular with the following:

- a one lane bridge on Tourist Road with limited space for pedestrians and cyclists
- the intersection of Tourist Road with Monument Road
- the complex intersection of Tourist Road with Creighton's Road and Papakura-Clevedon Road
- Ardmore Primary School, which has a limited drop off / pick up space on the main Papakura-Clevedon Road when most children arrive at and leave school by car.

These safety issues continue to be of significant concern to the community and Local Board. The intersections mentioned above have high DSI numbers. Although the Ardmore School (Ministry of Education) has been encouraged by the Local Board to purchase the Council land adjacent to the school adjoining Burnside Road to enable safer access to the school, they have yet to do so and continue to use the Papakura Clevedon Road access. The Board would like to see safety improvements to mitigate these issues.

Summary of written Comments provided by Asset Owners

Auckland Transport

Vaishali Sankar, Senior Transport Planner from Auckland Transport (AT) has provided comments on the referral application which can be viewed in attachment 1.

Auckland Transport hold a neutral position in regard to whether this referral application is accepted for processing under Fast Track Legislation.

Auckland Transport has noted that there is no increase to the annual extraction limit of 3 million tonnes per year. Additionally, there are no proposed changes to operational parameters, including the approved maximum of 90 truck movements per hour or the hours of operation.

However, based on the information provided, AT considers that the proposal appears to offer limited regional transport benefits.

Should the project be accepted, AT notes that further information will be required to enable a detailed assessment of any substantive application. The matters outlined below highlight potential impacts that should be considered by the applicant and addressed in any subsequent substantive application.

Relevant matters to consider:

Existing Limitations on Operation of Quarry

As part of an appeal by Fulton Hogan Ltd in 2018 (Appeal - ENV-2018-AKL-000044 and ENV-2018-AKL-000046 for Consent - BUN60302442), the Environment Court imposed limitation on truck movements per day, hours of operation and temporary restriction on certain routes. These limitations are:

The days and the hours of truck movements on the roads are limited to:

- Monday to Friday – 6.30am to 6pm

- Saturday – 6.30am to 1.00pm (excluding public holidays)

Truck movement numbers are limited to:

- Maximum of 90 truck movements per hour (Monday to Saturday) or not exceed an average of 900 truck movement per day, measure on a 12-month rolling basis.

The quarry currently operates under the conditions specified above.

Pavement and Asset Effects

AT's Pavement Engineer specialist considers there is a risk of accelerated pavement deterioration with the heavy vehicle loading and overall increase in period of extraction from initial 20 years that was approved to 50 years proposed. Accelerated pavement deterioration can lead to increased maintenance and repair costs for the Road Controlling Authority, reduced pavement service life, and increased safety risks for road users. Some intersection upgrades including pavement upgrades at 530 McNicol Road may be required for slow truck movements with braking / acceleration and turning movements. The Environment Court had conditioned the sealing, upgrading and widening of McNicol Road from 530 McNicol Road to the quarry entrance (BUN60302442), however it is unclear if this work has been undertaken by the applicant. In order to better understand the effects on McNicol Road and how it is functioning, AT requires further information from the applicant, such as a pavement impact analysis, to understand the pavement life compared to the design life and the anticipated effects.

Road Safety Effects

AT's Road Safety specialist has advised that McNicol Road currently presents a low collective risk. As the applicant is not proposing any increase in the existing trip generation limits, no additional inherent safety risk is anticipated on McNicol Road.

However, it is noted that the intersection of Papakura–Clevedon Road and Tourist Road have recorded seven crashes since 2020, five of which involved vehicles failing to give way. If quarry trucks are expected to utilise this intersection, additional care is recommended when undertaking turning movements.

Recommended Substantive Application Material

AT requests that, should the Project be accepted for the Fast Track consenting process, the full application material including a Traffic Report, should be referred to AT for review. The Traffic Report should include, but not be limited to the following:

- Details on whether the quarry site is currently operating and indication on when the sealing, widening and upgrading works will be undertaken on McNicol Road or if it has already been undertaken.
- Details on how compliance with the limitations on truck movements, timing, etc has been achieved.
- Information on the proposed construction methodology, including an assessment of construction and earthwork heavy vehicle-related trips. This should include:
 - A Draft Construction Traffic Management Plan (CTMP) covering an assessment of effects on construction traffic (including measures to maintain safe and

efficient operation for all road users).

- A Pavement Impact Assessment, including video surveys of McNicol Road used by heavy vehicles, including the unsealed section between 530 McNicol Road and 546 McNicol Road.
 - Clarify if the section between 530 McNicol Road and 546 McNicol Road will be maintained by the applicant.
 - Undertake traffic survey on McNicol Road to indicate the latest traffic volumes.
- Details of how any potential adverse effects on the adjacent transport network will be managed, including the unsealed section.
- The road safety effects of the development on the wider network, including but not limiting to CAS assessment.
- Provide tracking curves for the proposed truck movements on McNicol Road, especially on the curves and access to the site.
- Clarification on whether all the transport related conditions, including the monitoring conditions under consent BUN60302442 will be retained as outlined in the existing consent order provided by Environment Court, dated 25 October 2018.

Parks & Community Facilities

Kirsty Smith, Parks Planner from Parks & Community Facilities, has provided comments on the referral application which can be viewed in attachment 1.

Kirsty has confirmed that Parks & Community Facilities hold a neutral position in regard to whether this referral application is accepted for processing under Fast Track Legislation.

The Clevedon Quarry Expansion site is adjacent to the Auckland Council, Hunua Ranges Regional Park.

The subject site is also adjacent to other public open spaces including McNicol Road 661r, McNicol Road 860r, and Wairoa Gorge Scenic Reserve to the west. These open spaces are zoned open space – conservation, are owned by the crown and managed through the Department of Conservation. There is no management plan that council is aware of for this land, meaning its ownership is fully with DOC. Any effects on this land should be reviewed and provided comments from by DOC.

Open space provision

The underlying zoning Rural Production Zone, Special Purpose - Quarry Zone do not require the provision of open space, landscape or amenity effects

As such, there are no concerns from an open space capacity or provision perspective in relation to this proposal.

Existing open space

There are currently no plans to expand the adjacent Hunua Ranges Regional Park, however, the introduction of a recreation plan in the near future may increase the number of visitors to the western side of the reserve significantly. This needs to be considered when assessing possible effects on the reserve and its users.

- Construction-Related effects - The bulk of the Hunua Ranges is over the ridge on Orum Road. The impacts would be minimal in terms of noise and vibration. Consideration needs to be given to effects on conservation and how the Ranges will be protected during expansion of the quarry. Consideration also needs to be given to any effects from land disturbance with dust potentially settling within the open space.
- Reverse sensitivity effects – As public access to the west side of the open space is opened up in future there is potential for impacts of ongoing use of the quarry to users of the open space. It is important that the quarry expansion does not lead to constraints on the recreational activities undertaken in the reserve now and in future.
- Conservation effects – Hunua Ranges is a regional park with significant conservational values. There is potential for flora and fauna species from the open space to move across the boundary and enter private land due to the conservation work
- happening within the Ranges. It is important that consideration is given to biosecurity and how natives and pests can be kept in and out of the ranges retrospectively.
- Access and vehicle movements – Confirmation of what new vehicle movements will be created on roads adjacent to the reserve is required. It is important biosecurity and reverse sensitivity effects of any increase in movement on Orum Road are managed.

Offsetting

The referral application indicates offsetting in many instances throughout the application. An offset and/or compensation package is mentioned to be “detailed as part of the substantive application and will be encapsulated through proposed conditions of consent”. It should be noted that any offsetting that may be proposed on existing open space land owned by Auckland Council as a part of any package will not be supported by Parks and should be assessed outside any regulatory process as any works within Council owned land requires Land Owner Approval which is separate from the regulatory process.

Overall recommendations for consideration

- Address reverse sensitivity effects on users of the open space and conservation value through appropriate design responses and ongoing work management.
- Provide construction and environmental management plans including specific mitigation for impacts on adjacent open spaces and the conservation work occurring.

- Address mitigation of any dust effects on the use of the ranges during construction of each stage of expansion.
- Provide conservation and management plans for impacts from any increase in movement along Orum Road adjacent to the open space.

Monitoring

Rebecca Rees, Environmental Monitoring Officer, Auckland Council is currently responsible for monitoring the active consents at Clevedon Quarry.

Rebecca attends Community Liaison Meetings (CLG) required by conditions of existing resource consent which provides for the operation of the quarry. Rebecca has advised that the main concerns raised during the (CLG) she has attended have related specifically to truck activity/movement. However, as the description of this project states, no changes are proposed to the current consented annual extraction limit of 3MT per year, and there will be no increase to existing operational parameters such as truck movements or hours of operation; Ms Rees consider that this project should not result in additional effects on the Clevedon Community.

All comments made by Rebecca are listed above and therefore a copy of her comments have not been included in attachment 1.

Watercare Services Limited

Chloe Jacobs, Development Planner, Major Developments from Watercare Services Limited has confirmed that Watercare has reviewed the referral application and has no concerns with the referral application. Therefore, Watercare also hold a neutral position in regard to whether this referral application is accepted for processing under Fast Track Legislation.

All comments made by Chloe are listed above and therefore a copy of her comments have not been included in attachment 1.

Healthy Waters

Mark Izard, Manager – growth and development, Healthy Waters has confirmed that Healthy waters have no tangible or applicable comments on the proposal. Therefore, Healthy Waters also hold a neutral position in regard to whether this referral application is accepted for processing under Fast Track Legislation.

All comments made by Mark are listed above and therefore a copy of his comments have not been included in attachment 1.

Summary of written Comments provided by Subject Matter Experts

Economist

Council consultant Economist – Mr Tim Denne from Resource Economics has provided comments on the referral application which can be viewed in attachment 1.

Mr Denne reviewed the Clevedon Quarry Expansion Economic Assessment report produced by M.E Consulting and dated 13 April 2016.

Mr Denne has confirmed that he considers the approach to economic analysis undertaken by M.E to be appropriate. However, Mr Denne also considers there to be missing elements from the analysis and that some details are either insufficiently transparent for him to be confident in the

assumptions or the results. Auckland Council recommends that the applicant has M.E update their economic report to address the points raised by Mr Denne in his review, prior to the lodgement of any substantive application. Doing so will provide greater clarity and certainty regarding any conclusion associated with the economic benefits associated with the proposal.

If you have any queries, please contact me on 021 319 813 and quote the application numbers referenced above.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'D. Fletcher', with a stylized, flowing script.

Doug Fletcher

Principal Project Lead

Premium Resource Consents, Planning and Governance Directorate

Auckland Council.

Your written comments on a project under the Fast-track Approvals Act 2024

Project name	Clevedon Quarry Expansion
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name	Department of Conservation		
*First name	Shawn		
*Last name	Gardner		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz ;		

2. Please provide your comments on this application
Comments follow overleaf.

Manager's signoff

Jenni Fitzgerald

15 June 2026

Director-General of Conservation s17 comments

Project name	Clevedon Quarry Expansion
Applicant name	Stevenson Aggregates Limited
Application number	FTAA-2605-1228
Project summary details	In stages, to increase the aggregate resource at Clevedon Quarry from 60 million tonnes (MT) to approximately 150 MT, and provide for this resource to be extracted over a period of up to 50-years. The applicant is seeking Wildlife Act Approval for salvage and relocation of Hochstetter's frogs. The project is not located on Public Conservation Land.

1 General comment

- 1.1 The applicant sent a request for consultation on the 19th of March 2026 and paid their invoice on the 9th of April 2026. Initial contact with the applicant occurred on the 10th of April 2026 and a meeting occurred on the 14th of April 2026. DOC provided a pre-lodgement consultation summary to the applicant on the 4th of May 2026. This document is provided in pages 44 – 52 of Appendix E included in the applicant's referral application.
- 1.2 One key consideration discussed during consultation was the long timeframe of the project (being between 25 and 50 years) and the potentially broad range of wildlife impacts. DOC noted to the applicant that Wildlife Act Approvals (WAA) typically are not issued for more than 10 years at a time. Given this, DOC noted that it may be most appropriate for any wildlife effects that are expected to occur more than 10 years in the future, for the applicant to seek WAA through the business-as-usual process closer to the time when the impacts are anticipated in order to better assess the likely effects.
- 1.3 DOC noted in pre-lodgement consultation feedback that any works in or diversions of streams may require Complex Freshwater Fisheries Activity Approval (CFFA) under the Freshwater Fisheries Regulations, and encouraged the applicant to consider including any CFFA that may be required. It appears as though the applicant has not chosen to apply for any CFFA as a part of this referral application. CFFA include culverts, fords, dams, diversion structures, and fish transfers. It is not clear from the information provided whether any in-stream structures are proposed. However, the applicant is proposing to cause the irreversible loss of approximately 2.3km of stream habitat and transfer the fish from this habitat to nearby streams. DOC is of the opinion that such a transfer falls under section 26ZM(2)(a) of the Conservation Act 1987 and therefore counts as a Complex Freshwater Fisheries Activity under section 42(4)(j)(iv) of the FTAA. While it is noted that an applicant under the FTAA may choose to apply for as many or as few approvals as they deem prudent, DOC is of the opinion that it would be difficult to consider the full and complete effects of the proposed activity without considering the impacts to freshwater fisheries that arise as a result of the proposed stream extinction.

- 1.4 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, DOC considers that there is sufficient information to make a decision on referral. Once more information is available at the substantive stage, it will be possible to determine whether the project can be appropriately designed with conditions to meet the tests in the FTAA.

2 Minister's decision on referral application

- 2.1 FTAA sections 21 and 22 set out matters to be considered in determining whether a referral application should be accepted.
- 2.2 DOC notes that other agencies are better placed to comment on most matters, including those in section 22. Comments below are therefore targeted to sections where DOC has specific interests or information relevant to the Minister's decision.
- 2.3 DOC has the following comments on sections 21(3) and (4), and section 22:

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	DOC has considered section 5(1) (f), (h), (i), (j) and (k). DOC has not identified any aspect of the Project that would be ineligible under these sections.
21(3)(c)	Is there adequate information to inform a decision	DOC considers the information adequate in terms of a referral decision.
21(4)	Are there any other reasons not specified	DOC has not identified any other reasons why the project should not be referred.
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	The relevant Treaty Settlement Acts are: • Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014; • Ngāi Tai ki Tāmaki Claims Settlement Act 2018; • Ngāti Tamaoho Claims Settlement Act 2018; • Ngāti Pāoa Claims Settlement Act 2025 DOC has not identified any inconsistencies with the relevant Treaty Settlement Acts. However, it is noted that Ngāi Tai ki Tāmaki has a Statutory Acknowledgement over the Wairoa River and its tributaries. The project is proposing to cause the irreversible loss of two streams that are tributaries to the Wairoa River. It is up to Ngāi Tai ki Tāmaki to comment on this effect in the context of their Statutory Acknowledgement. However, DOC considers that this Statutory Acknowledgement is relevant to the Project.
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	DOC considers that it would be more appropriate for any WAA where effects are not expected to eventuate for more than 10 years to be applied for through the business-as-usual process under the Wildlife Act. This is

Section	Criteria	Comments
		because it is difficult to appropriately understand and manage impacts on wildlife on a timescale greater than 10 years. It would also be difficult for a decision maker to be satisfied that future activities, their effects and management were appropriate to meet the legislative tests.
21(5)(c)	Would the project have significant adverse effects on the environment	Based on the level of information provided in the Application, it is not possible to determine the scale of effects. However, due to the scale, nature and location of the proposed Project site (being near a listed Significant Natural Area), DOC considers the Project is likely to have significant adverse effects on ecological values. This includes impacts on local freshwater ecosystems from surface water diversions and groundwater drawdown. The Applicant identifies that the Project will result in the permanent and irreversible loss of approximately 2.3 km of stream habitat, including disturbance of freshwater fauna and potential direct mortality during works. The Applicant proposes the implementation of fish recovery/relocation protocols through a Native Freshwater Fish Relocation Plan (NFFRP) and through a Baseflow Monitoring Programme (BMP) including augmentation where practicable. The Project will result in the loss of vegetation and terrestrial habitat. This includes approximately 6.7 ha of high-value regenerating tree-fern broadleaf forest. Long-tailed bats are known to forage at the Site and eDNA has identified the presence of Hochstetter's frogs. Further, native birds and lizards may use the Site. The Applicant is proposing offsetting and compensation including riparian and terrestrial restoration and pest mammal control across the restoration areas. Much will rely on the specific details of proposed management strategies and of any offsetting and compensation that the Applicant proposes.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the Applicant's compliance history under any Act for which DOC is the administering agency.
21(5)(g)	Would a substantive application have any competing applications	DOC has not identified any competing applications under any Act for which DOC is the administering agency.

UNCLASSIFIED

- 2.3.1 Section 22 sets out the criteria for the Minister for accepting a referral application. DOC has considered these criteria and comments as follows:

Section	Criteria	Comments
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	The Project is seeking resource consents and WAA. While it is clear that significant impacts on freshwater environments will occur, the applicant has not indicated a need to apply for CFFA, which would be needed if any culverts, fords, dams or diversion structures or facilities that would block or significantly alter fish passage were proposed. The long timescale of the Project makes the management of wildlife effects particularly difficult to understand across the lifetime of the Project. DOC indicated to the Applicant that for any WAA where effects are not expected for more than 10 years, it would be more prudent to apply through the business-as-usual process closer to the time when effects are anticipated. The Applicant is currently proposing only WAA for Hotchstetter's frogs. This may be in response to DOC's feedback as indicated above. Given the multiple approvals sought, there may be cost and efficiency benefits for the Applicant in terms of consideration of the approvals being combined under the FTAA decision-making framework.
22(2)(a)(ix)	Will this project address significant environmental issues?	No.
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	The following DOC Statutory Planning documents are relevant to the Project: • Conservation General Policy 2005 • Auckland Conservation Management Strategy 2014 At a high level, no inconsistency with these documents has been identified, but the Project will need to consider them if it proceeds to a substantive application.

22(b)	Any other matters the Minister may consider as relevant?	The Applicant is proposing to reclaim/infill approximately 2.3km of stream habitat. As a part of this, DOC understands that fish will be transferred to other nearby streams. DOC concludes that such an activity falls under section 26ZM(2)(a) of the Conservation Act 1987 and therefore would require CFFA under section 42(4)(j)(iv) of the FTAA. While it is noted that an applicant may choose to apply for as many or as few applications under the FTAA as they deem prudent, the impacts on freshwater fisheries are meaningful in the context of this application. In order to make the most efficient use of the FTAA process, it may be prudent to include CFFA in this application.
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3 Other considerations

- 3.1 The timing of activities that will impact wildlife and freshwater fisheries is a critical consideration for DOC in relation to how best to advance the required approvals. It is noted that the quarry expansion is proposed to take place over a period of between 25 and 50 years. Management regimes for wildlife and the presence of wildlife at the site is very likely to change over this period of time. It would therefore be ideal for any conservation approvals that are included in the FTAA application to either be for those activities that are expected to occur within the next 10 years or for such approvals to be structured in such a way that DOC can review the applicant's proposed management regime on a recurring basis with no more than a 10-year period.

4 Matters for the Minister to specify (s27)

If the project is referred, it is recommended the Minister request the applicant provide the following information in the substantive application:

- 4.1 A comprehensive Ecological Assessment, including assessments of expected effects across the different stages of the project (in 10-year increments). The Ecological Assessment should assess the actual and potential effects on vegetation, wetlands, freshwater, and fauna including avifauna, lizards, frogs, fish, invertebrates and bats. This would assist in decision making around how best to approach WAA and CFFA. This should include recent fish surveys within the proposed affected waterways.
- 4.2 Comprehensive wildlife surveys to confirm the presence (or not) of wildlife. It is noted that a baseline avifauna survey should include species presence and abundance and flight pathways including for nocturnal species. Surveys for bats need to be done during the bat season (October-April) when night-time temperatures are warmer. If bats are found to be present, a Bat Management Plan should set out how the project will avoid the loss of roost trees, mitigate for loss of vegetation, and address the effects of lighting and noise.
- Wildlife management plans including:
 - Frog Management Plan
 - Bat Management Plan

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- Lizard Management Plan
- Bird Management Plan
- Fish Management Plan (including, but not limited to, relocation/translocation plan)

4.3 Complete details of proposed offsetting and compensation measures to be included in an Offsetting and Compensation Plan. For all proposed loss of freshwater values, DOC recommends that Stream Ecological Valuation and Environmental Compensation Ratios be included. Further, it is noted that the applicant proposes ongoing long-term pest control. The Offsetting and Compensation Plan should detail how the Applicant intends to fund and actualise this in the long-term.



Jenni Fitzgerald
Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 15 June 2026

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011