

s 9(2)(a)

s 9(2)(b)(ii)

s 9(2)(a)

In support of the Fast Track Application of Scarbro Environmental Ltd for a Managed fill site in Drury (362 Jones Road).

I write in my capacity as s 9(2)(a), a s 9(2)(b)(ii) New Zealand construction company operating s 9(2)(b)(ii) across Auckland and wider New Zealand delivering civil, infrastructure, residential and commercial construction projects.

We have worked closely with Scarbro Civil and its leadership team for many years. They are a trusted family business built on integrity, technical expertise and consistent delivery across civil works, earthworks, demolition and waste management services supporting major development and infrastructure projects throughout the region.

Scarbro's services are directly linked to projects delivering significant regional economic and employment benefits, including residential developments, transport infrastructure, community facilities and essential services. Efficient earthworks and disposal solutions are critical to keeping these projects on programme and economically viable.

The proposed Drury managed fill facility to be run by Scarbro Environmental would materially support projects currently being delivered jointly by Scarbro Civil and s 9(2)(a) across Auckland, where we are consistently involved in development and infrastructure works with multiple individual project of values up to s 9(2)(b)(ii)

While project details cannot be disclosed due to client confidentiality and non-disclosure agreement obligations, these projects span residential, infrastructure and commercial developments and involve substantial earthworks where disposal logistics directly influence programme delivery. s 9(2)(b)(ii)

Access to the proposed Drury facility would provide clear logistical and programme benefits, including a reliable disposal option closer to many project locations, reduced haulage distances, faster truck turnaround times, improved excavation and material removal productivity, better utilisation of labour and plant, reduced congestion impacts, and improved sequencing of downstream construction works. These efficiencies support faster site establishment and acceleration of critical excavation and foundation stages, improving overall delivery certainty and timeframes. s 9(2)(b)(ii)

Conversely, constrained disposal options and extended haulage requirements currently impact project delivery across our programmes, with limited managed fill capacity adding cumulative delays of several months across

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projects, increasing haulage mileage, driving up project costs, and slowing delivery of residential and infrastructure development across the region. This will only get worse as the managed fill sites Scarbro currently drive to many miles away fill up (White Pine Landfill which is near Silverdale and Ridge Road Landfill which is near the Bombay Hills). What then? The Drury managed fill is needed now but it is even more critical that we think ahead and future proof. Otherwise, Auckland construction will grind down to a much slower pace.

In summary, the bottom line benefit we see is s 9(2)(b)(iii) savings across the baseline metrics of trucking, haulage, tipping & waste management in projects with civil works which would allow our construction company to build core infrastructure to benefit Auckland faster. It would also allow us to build more infrastructure given the cost and time efficiencies. s 9(2)(b)(ii)

Scarbro Civil has consistently proven to be a reliable and capable partner in delivering important projects throughout Auckland and surrounding regions. We trust and endorse Liam Scarborough, Paul and the wider Scarbro team and support initiatives that enable them and their partners to continue delivering infrastructure and development projects efficiently for the benefit of the wider region.

Yours sincerely,

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13 February 2026

In Support of the Fast Track Application of Scarbro Environmental Ltd for Managed Fill in Drury (362 Jones Rd)

I am the s 9(2)(b)(ii) for s 9(2)(b)(ii). We are a proudly New Zealand-owned and operated commercial construction company with a reputation for delivering complex projects on time, on budget and to a high level of quality.

We work in partnership with Scarbro on many large-scale construction projects throughout Auckland, s 9(2)(b)(ii)

Some other recent and current projects where we have worked with Scarbro to redevelop and optimise sites requiring removal of managed fill are as follows:

s 9(2)(b)(ii)

All of the above projects required removal of significant quantities of managed fill, and the cost effectiveness, efficiency and speed of removal were essential to project viability, and in each case these projects provided significant employment, community and commercial opportunities for Auckland.

The proposed new managed-fill site at Drury would assist us to build infrastructure faster and at less cost therefore allowing us to build more, as follows:

- Closer access to managed fill sites means faster truck turnaround therefore lower cost and improved programme

s 9(2)(b)(ii)

- Existing fill sites are considerable distance away – White Pine Landfill which is near Silverdale and Ridge Road Landfill which is near Bombay Hills) s 9(2)(b)(ii)
- Benefit of having managed fill site near quarry sites for backloading and therefore cutting trucking costs and environmental impacts.
- Most sites we work on have an element of managed fill, if not the whole site
- Requirement for managed fill is often encountered on brownfield sites that are being remediated/ repurposed – s 9(2)(b)(ii)
- Requirement to manage fill often occurs in some virgin soils due to volcanics – s 9(2)(b)

Without access to the proposed fill site, our projects with Scarbro will take considerably longer (est 15-25% increase on project durations) which will add significant cost and impact the viability of many projects. If Scarbro cannot proceed with this fill, then the future is bleak as they would have to drive even further once the White Pine Landfill and Ridge Road Landfill are full up, which would really slow our project programmes down and drive up costs.

Scarbro have always been a good operator to work with – professional and trustworthy and are an essential partner in our construction and development work in the Auckland region for Earthworks and other civil work. Many of our projects involve strict compliance and environmental conditions throughout construction, and Scarbro have consistently managed their works to comply with these conditions.

We know Scarbro have done mitigations and adjusted their proposed clean fill after consultation during their RMA process, but without consents under the Fast Track Applications Act, this essential infrastructure will not get built which is essential for the economic and employment benefit of Auckland.

Should you require any further information please feel free to contact me on s 9(2)(a) .

Yours Faithfully,
s 9(2)(a)



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s 9(2)(b)(ii)

13 February 2026

In Support of the Fast Track Application of Scarbro Environmental Ltd for a Managed Fill in Drury (362 Jones Rd)

I am the executive director of s 9(2)(b)(ii)

s 9(2)(b)(ii) and we have been delivering success across a wide range and scope of construction and infrastructure projects across all building sectors ever since.

s 9(2)(b)(ii)

None of our residential projects can proceed without civil earthworks and the disposal of managed fill. In our experience the cut volume (material removed) for any given site/project generally far exceeds the fill volume (material that can be reused on site) which results in a large amounts of fill needing to be disposed of. Often it is also not possible to reuse cut as fill on the same site if it is not of the necessary quality.

In addition, apartment buildings and other projects generally require basement carparking which greatly increases the need for cut and fill disposal above the level that would be required to simply establish a flat site. With more apartments being built in Auckland, this is becoming a significant issue.

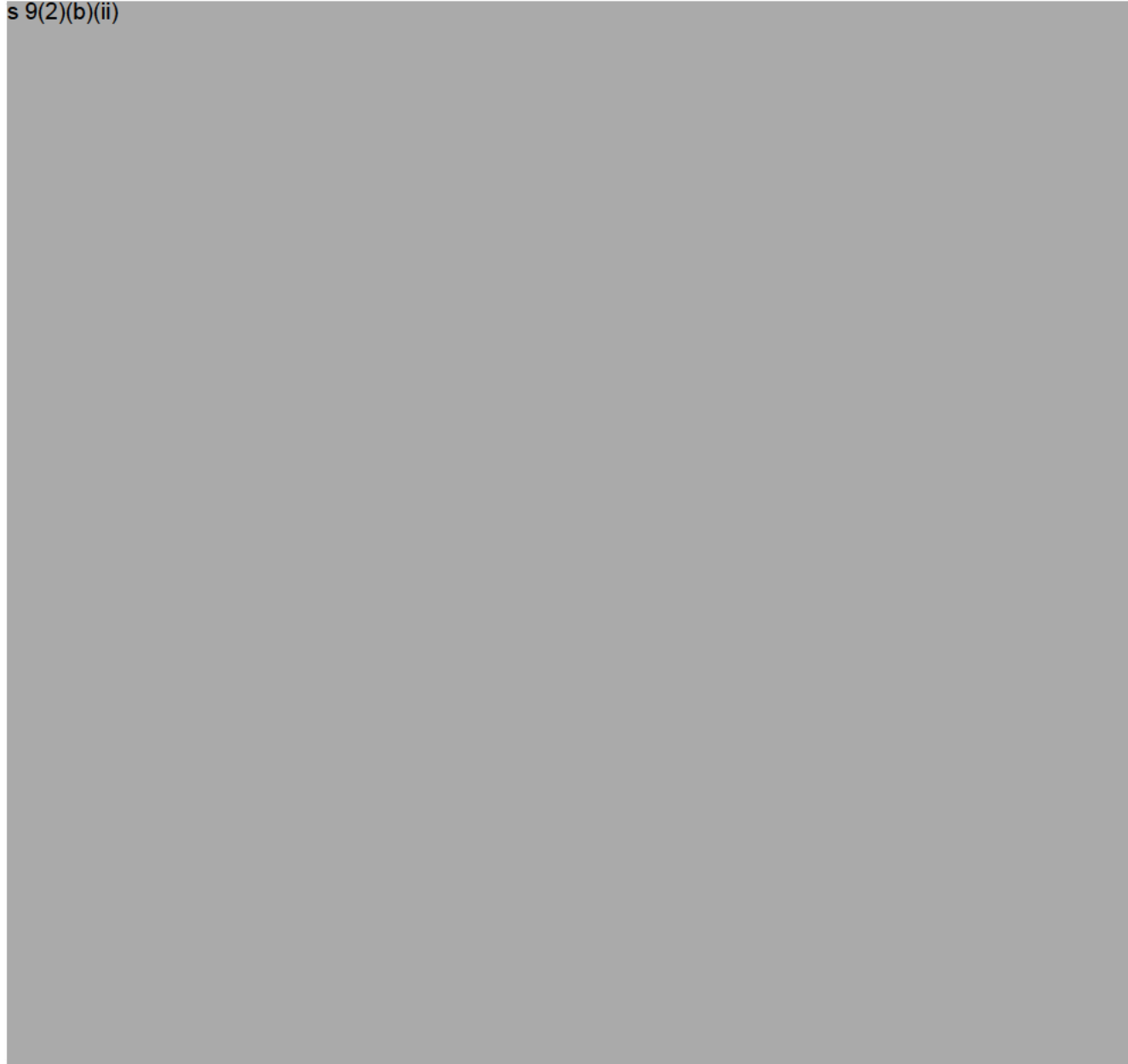
s 9(2)(b)(ii)

s 9(2)(b)(ii)

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s 9(2)(b)(ii)



- In addition to this, if the Drury managed fill does not proceed, the result will be lost productivity and delays on site due to the additional travel time and it would also result in additional congestion, emissions and wear and tear on the roading network. We would estimate the lost productivity due to additional travel time would s 9(2)(b)(ii)

- The longer term outlook would be much more difficult for construction of infrastructure.

Scarbro is a great family company and we trust and rely on them for earthworks and other civil work to support our projects.

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s 9(2)(b)(ii)

10 February 2026

Reference: In Support of the Fast-Track Application of Scarbro Environmental Ltd for Managed fill in Drury (362 Jones Road)

This submission is in support of the above applicant, Scarbro Environmental Ltd, in relation to its fast-track application for a managed fill in Drury (362 Jones Road).

s 9(2)(b)(ii)

Our reasons for supporting Scarbro’s proposed managed fill facility are as follows:

- s 9(2)(b)(ii) has had a long-standing working relationship with Scarbro and can vouch for their professionalism and integrity in our dealings with them.
- Their proposed managed fill facility introduces another option when existing landfill facilities are traffic-congested and trucks are waiting to load off. Having the option to access another consented facility in the region will prevent long queuing times for trucks, and therefore reduce noxious vehicle emissions produced by continual re-starting or idling trucks, while making the round trip for our trucks more timely, efficient and cost effective.
- As new “towns” and subdivisions are created south of Auckland, e.g. Drury, Tuakau and Pokeno, Scarbro’s proposed managed fill facility will create new local jobs and employment for those living in these new areas. It will also reduce motorway congestion.
- As commercial and residential development grows and sprawls south of Auckland, it is important to have additional capacity in new locations ready to help accept the increased volume of clean and managed fill resulting from earthworks and construction associated with this growth.
- Based on my s 9(2)(b)(ii) of industry experience, it’s my opinion that if Scarbro’s proposed managed fill was not consented then this will significantly slow down millions, if not billions, of dollars of desperately needed development work for greater Auckland, as well as increasing the costs of those development works.

Yours sincerely

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12 February 2026

In support of the Fast Track Application of Scarbro Environmental Ltd for a Managed Fill in Drury (362 Jones Road):

I am the Managing Director of the s 9(2)(a) . We are a civil construction contractor delivering a diverse range of civil and infrastructure projects across Aotearoa New Zealand.

We work in partnership with Scarbro on numerous large-scale infrastructure projects in the Auckland region, including s 9(2)(b)(ii)

These projects include:

- s 9(2)(b)(ii)

These projects greatly benefit the Auckland region economically and in terms of creating employment and Scarbro’s work directly enables that to happen.

We understand that Scarbro has submitted a fast-track application for a managed fill site at Drury. This would significantly assist in reducing travel times to alternative tip sites across Auckland and would therefore contribute to lowering construction costs. This would also increase the speed at which we can build, especially at brownfield sites.

We are really concerned that if Scarbro cannot get a consent for this new Drury managed fill, then the economic viability of our core infrastructure projects will be materially and detrimentally affected. Trucks are already having to drive to White Pine Landfill which is near Silverdale and Ridge Road Landfill which is near the Bombay Hills to tip and then return to pick up their next load. That’s very slow and expensive and those tip sites are filling up. Having to drive even further out to tip clean/managed fill will significantly impair the construction of our core infrastructure projects in the Auckland region that are so critically needed. The problem is only going to get worse if this managed fill in Drury is not consented.

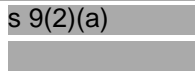
Given our very successful pipeline of very significant construction contracts, we are concerned that those projects will be significantly slowed down if the Drury managed fill proposal cannot be consented.

Scarbro has consistently proven to be a trustworthy and reliable partner, and we look forward to continuing our relationship with them into the future.

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