



# KAIPARA

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Ngā Maunga Whakahii o Kaipara

23 July 2025

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Submission to the Panel Convenor  
Kings Quarry Expansion – FTAA-2502 – 1018

**Subject: Written Response to Schedules 1 and 2 – Convenor's Conference 29 July 2025**

Tēnā koe Christina,

This response relates to the upcoming conference scheduled for 29 July 2025 concerning the application to expand Kings Quarry under the Fast-track Approvals Act 2024 [FTAA]. This submission responds to the matters identified in Schedules 1 and 2 of the Minute issued by the Panel Convenor.

We (Ngā Maunga Whakahii o Kaipara) are listed as per Schedule 3 (ii), being a relevant iwi authority/relevant Treaty settlement entity. We have prepared this response alongside Te Kia Ora Marae Trustees – Ngāti Rango Hapu as feedback from both entities for the Conference on 29 July 2025.

## **Schedule 1 – Matters to Consider**

### **1. Approvals**

Our concerns are the proposed removal of 50ha of SEA vegetation including approximately 5.5ha of mature kauri, podocarp, and broadleaved forest (classified as 'regionally endangered'), affecting habitat connectivity, biodiversity, wildlife survival, and ecosystem health. The enormity of this cannot be downplayed. Iwi have been playing a crucial role in conservation efforts in North Auckland and the hinterland of the Kaipara Harbour. Wildlife corridors between the coasts in this relatively narrow part of the motu are critical to the success of various threatened species. Kiwi are known to need this 'regionally endangered' habitat and as such we must all collaborate in protecting it. They are entwined in our identity and kiwi have been recorded nearby at Makarau. This high value natural habitat, in particular the 5.5ha, needs to retain the necessary protection i.e. exclude from any development/quarry operation.

## **NGA MAUNGA WHAKAHII O KAIPARA**

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Stream removals are proposed - approximately 2,842m of intermittent stream and 553m of permanent stream will be impacted. The effects on terrestrial and freshwater ecological values arising from the project are considered to be 'very high'. Water quality would also be severely impacted by any deforestation in the catchment, owing to soil loss and the knock-on effects of general ecosystem decline. Freshwater is a taonga, of practical, cultural and spiritual significance to Māori. Our objective is that the mauri of all freshwaters within our rohe, is restored and protected in ways which enable Ngāti Whātua o Kaipara Ngā Rima to provide for their social, economic, environmental and cultural wellbeing and that of generations to come. We consider that stream removals or reclamations are unnecessary, and further effort should be applied to avoid this.

Management of overburden, potential sediment discharges, risk effects on freshwater and groundwater systems have not been clearly addressed.

The application does not define where any offsetting location will be within the area, to address SEA loss, no time frames associated with the establishment of the offset, nor the waterway restoration plan.

Full details of proposed offsetting should be provided as part of the fast-track application process. That is, for participating parties to be fully informed of how the net gain in biodiversity values is to be achieved (through conditions of compensation actions/offset areas) with an opportunity to review this in detail and have time to adequately respond.

Under the Auckland Unitary Plan, the precinct has long been designated a Quarry site. There has been no up to date geotechnical information supplied, regarding the extent/quality of the material on site for use. We view this as an important consideration given the removal of the ecosystems is to expose material for the benefit of infrastructure or landscaping.

## 2. Complexity

The long-term scale of quarrying activity and its intersection with culturally sensitive sites, aquifer recharge zones, waterway and ecological corridors, introduces significant factual complexity.

### - Legal Complexity:

The application engages multiple intersecting statutory regimes, including the FTAA, Resource Management Act 1991 (RMA), and the Ngāti Whātua and Ngāti Manuhiri Treaty settlement legislation. There is potential for unresolved legal issues around Treaty compliance, the use of withheld cultural information, and the interface of the FTAA with iwi rights.

### Evidence

Ngā Maunga Whakahii o Kaipara acknowledge the existence of a Cultural Values Assessment (CVA) submitted by whānau of Te Kia Ora Marae (Ngāti Rango) in 2023, currently withheld.

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Due to challenges in 2023, regarding engaging the PSGE Ngā Maunga Whakahii o Kaipara, the Iwi Authority who would normally engage on the Iwi behalf, the Marae stepped up to hold that place. Asking that it only be shared with the applicant at that time, out of deference to the RMA process and the role Iwi Authority, Ngā Maunga Whakahii o Kaipara hold.

It is noted that at that time the site visit was made by Marae Representatives and CVA prepared, Marae representatives had a Draft version of Bioresarches Ecological Report, an Archaeological Report by CFG Heritage, and the proposal was offsetting at a location in Kaipara Hills that had extensive cyclone damage. This site did not eventuate: this point is a key consideration when evaluating the withheld CVA prepared by Te Kia Ora Marae.

### 3. Issues Identified

Concerns raised by whānau and hapū during preliminary consultation include long-term environmental and cultural impacts, adequacy of consultation, risks to wāhi tapu and Treaty settlement lands, and exclusion from formal assessment processes.

In addition to the concerns noted under part 1 of this letter (mostly pertaining to deforestation and stream removals), we also assert that there is inadequate consideration of traffic impacts, pest management strategy, and a lack of information about employment generation from the proposal.

It is known that extractive industries generate a great many heavy traffic concerns. In this instance, the impact of truck movements to and from the quarry (if expanded) would be multiplied considerably and lead to severe degradation of the local roading network. We feel the wider social effects of this activity on the receiving rural roads in all directions has not been sufficiently assessed. That is in terms of safety considerations and where the cost falls for necessary repairs.

Further to comments above about habitat protection, the application is deficient in assessing the requisite pest management efforts to achieve desired biodiversity outcomes. The introduction and spread of non-indigenous species have resulted in habitat destruction across the whenua. Pest management needs to protect and enhance the ecological condition of priority ecosystems. In this regard we would also request that further attention be given to plant and animal pest management programmes that would be necessary to help mitigate the adverse impacts of quarry expansion.

In addition to environmental factors, economic and social sustainability aspects are also reviewed for significant proposals in our rohe. There does not appear to be sufficient assessment of employment generation potential from the quarry development; in regard to employment opportunities for whanau whose past generations have worked at the former Pebblebrook quarry.

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## 4. Panel Membership

We recommend the panel include members with recognised expertise in tikanga Māori, Treaty settlement implementation, and regional context. We also support expanding panel membership beyond four due to the cultural sensitivity and scale of the proposal.

## 5. Tikanga

Tikanga is central to assessing cultural effects. We support the appointment of tikanga-based advisory support to assist the panel, coordinated through kaumātua nominated by Ngāti Rango and Ngā Maunga Whakahii o Kaipara.

## 6. Procedural Requirements

Ngā Maunga Whakahii o Kaipara along with Ngāti Rango & Te Kia Ora Marae are open to participating in hui and briefings. A hearing may be necessary to address unresolved matters. We recommend a staged and culturally safe approach to managing sensitive cultural evidence.

## 7. Other Considerations

### Schedule 2 – Estimated Timeframe

- Initial response [this submission]: 26 July 2025
- Follow-up consultation with Ngā Maunga Whakahii, Ngāti Rango and Te Kia Ora whānau: Two - Three weeks
- Technical engagement [cultural, ecological, hydrological]: Six – Eight weeks, pending release of information.

Regarding the online conference for 29 July. Item 5 of that minute says that all participants shall provide information sought (a written response) set out in Schedules 1 and 2 attached to the Minute.

We welcome the opportunity to discuss these matters further at the convenor's conference and remain committed to constructive participation in the process.

Kāti ki konei,

Shona Oliver

Environmental Services Manager

On behalf of,

Te Kia Ora Marae

Ngāti Rango

Ngā Maunga Whakahii o Kaipara Development Trust

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