

**IN THE ENVIRONMENT COURT OF NEW ZEALAND
AUCKLAND REGISTRY**

ENV-2024-AKL-

**I TE KŌTI TAIAO O AOTEAROA
TĀMAKI MAKAURAU ROHE**

UNDER

cl 29 of Schedule 1 to the
Resource Management Act 1991
("RMA")

IN THE MATTER OF

an appeal against decisions on
Proposed Plan Change 88
(Beachlands South) to the
Auckland Unitary Plan (Operative
in Part)

BETWEEN

AUCKLAND TRANSPORT

Appellant

AND

AUCKLAND COUNCIL

Respondent

AND

**MANUKAU QUARRIES LIMITED
PARTNERSHIP**

Section 274 Party

**NOTICE OF WISH ON BEHALF OF MANUKAU QUARRIES LIMITED
PARTNERSHIP TO BE A PARTY TO PROCEEDINGS**

Dated 13 June 2024

Counsel acting:
Janette Campbell | Aidan Cameron

BANKSIDE CHAMBERS

Level 22, 88 Shortland St
Auckland 1010
PO Box 1571, Shortland St
Auckland 1140
P: +64 9 307 9955
E: aidan@bankside.co.nz

**NOTICE OF WISH ON BEHALF OF MANUKAU QUARRIES LIMITED
PARTNERSHIP TO BE A PARTY TO PROCEEDINGS**

To: the Registrar
Environment Court
Auckland, Wellington and Christchurch

This document notifies you that Manukau Quarries Partnership (“**MQLP**”) wish to be parties to the following proceedings:

- ENV-2024-AKL- Auckland Transport (“**the Appellant**”) v Auckland Council (“**the Respondent**”).
1. MQLP owns the land at 867 Whitford-Maraetai Road, Beachlands (legally described as Section 2 Survey Office Plan 487740) and 885 Whitford-Maraetai Road, Beachlands (legally described as Lot 2 DP 54701 and Lot 2 DP 202389) (together the “**MQLP Quarry land**”).
 2. The MQLP Quarry land includes a working quarry, which has operated for the last 50 years providing greywacke rock for aggregate supply. The MQLP Quarry land also operates as a clean and managed fill site.
 3. As noted in MQLP’s submission, MQLP has been working towards future planning for the site as rehabilitation works associated with the quarry will be completed within the coming years.
 4. On 7 July 2023, Knight Investments Ltd (an associated entity, operating under the Nakhle Group banner of entities with a specific interest in industrial and commercial development) was successful in having its request for a project (namely the Puru Business Park) referred to an Expert Consenting Panel under the COVID-19 Recovery (Fast-Track Consenting) Act 2020.
 5. The Puru Business Park is located on part of the MQLP Quarry land. The project will develop part of the Quarry land for a light industrial business park development, including the construction of yards, buildings for light industrial purposes, a private road, parking and associated infrastructure. The project also includes associated works to construct a new roundabout on Whitford-Maraetai Road, and the upgrade of the Whitford-Maraetai Road Reserve.

6. MQLP therefore has an interest in the proceedings which is greater than the public generally.
7. MQLP also made a submission about the subject matter of the proceedings.
8. MQLP is not a trade competitor for the purposes of s308C of the Resource Management Act (“**RMA**”).
9. MQLP is interested in all of the proceedings.
10. MQLP opposes the relief sought by the Appellant, to the extent that it seeks that Plan Change 88 be declined, for the following reasons:
 - (a) it will not promote the sustainable management of natural and physical resources, and will not achieve the purpose of the RMA, in that it fails to sustain the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations;
 - (b) it is contrary to Part 2 of the RMA;
 - (c) it does not give effect to the direction in national instruments, including the National Policy Statement for Urban Development 2020 (“**NPS-UD**”);
 - (d) it does not give effect to the direction in the Regional Policy Statement (“**RPS**”) provisions of the Auckland Unitary Plan (Operative in Part) (“**AUP**”); and
 - (e) it is not the most appropriate way to achieve the objectives of the AUP and the purpose of the RMA, as required by section 32 of the RMA.
11. MQLP agrees to participate in mediation or other alternative dispute resolution of the proceedings.

MANUKAU QUARRIES LIMITED PARTNERSHIP by its duly
authorised agents:



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Janette Campbell | Aidan Cameron
Counsel for MQLP

Date: 13 June 2024

Address for service:

c/- Aidan Cameron
Barrister, Bankside Chambers
Level 22, 88 Shortland Street
PO Box 1571
AUCKLAND 1140
P: +64 21 0437 482
E: aidan@bankside.co.nz

To: the Registrar of the Environment Court at Auckland

And to: the Appellant

And to: the Respondent

Advice

If you have any questions about this notice, contact the Environment Court in Auckland, Wellington, or Christchurch.