

Hunua Quarry Development [FTAA-2603-1185]

Topics for ecology workshop to be held on 3 September 2026

Issue	Status	Applicant position	DOC position	AC position
1: Wildlife permit				
Gecko translocation	The release site location questioned by DOC in s51 report. Updated information provided by Applicant in Response to Comments.			No AC position. Lizard salvage and relocation are addressed through the Lizard Management Plan, which AC accepts in general subject to certification (AC s53 memo, s6.3.1). Release site selection is a Wildlife Act matter for DOC.
2: Complex Freshwater Fisheries				
2.1: Streamworks in Tributaries 3 and 4	Proposal for these tributaries unclear in application materials. Scope of proposed activity questioned by DOC in s51 report and s53 comments. Updated information provided by Applicant in Response to Comments.			Resolved - Removal of the Stage 7 losses of Tributaries 3 and 4 from Tranche 1 (Response p. 20) is accepted. The effects of an activity not currently sought should not be offset now. Unresolved - Blocking of fish passage at the Tributary 4 culvert is not supported by a completed feasibility assessment. PDP (email, 18 August 2026) identify in-culvert grouted rock, constructed baffles, flow channelling, a debris screen and culvert upsizing as options, and state that these are conceptual and require further development and analysis to confirm practicality. Infeasibility is asserted rather than demonstrated. AC seeks provision for climbing fish passage, or a completed options assessment before culvert design is fixed. - The Tributary 4 upstream reach is given as 191 m (Response p. 20 bullet; Table 1 p. 21; draft condition 158) and as 151 m (Response p. 20 text; Attachment 1 p. 4). The offset quantum depends on which figure is correct. - Draft conditions 157(a) and (b) require an ecologist to confirm pre-set figures of 2,840 lineal metres lost and 10,224 lineal metres to be restored. The derivation of those figures is not provided. AC seeks either the calculation or condition wording that requires the figures to be derived at the time rather than confirmed. - Additionality of barrier remediation relied on as compensation. See 3.3 below.
2.2: Values of Tributaries 3 and 4	Ecological values of tributaries poorly described. Fish species in Tributaries 3 & 4 questioned by DOC in s51 and s53 comments. Additional surveying completed by Applicant and appended to Response to Comments Ecology Memorandum.			Agreed - On the evidence available, AC accepts that shortjaw kōkopu are unlikely to be present in either tributary. Unresolved - Attachment 1 (UPDATED 24 August 2026, p. 3) records banded kōkopu detected by eDNA in Tributary 3. Banded kōkopu is a climbing species, is currently classified At Risk - Naturally Uncommon (Dunn et al. 2025) and is regionally significant (Bloxham et al. 2023, Auckland Council TR2023/13). The application assessed it as Not Threatened. AC supports DOC on this point. The Applicant response (p. 17, comment 9.048) that SEV and ECR do not use threat

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				status is correct as to those calculators, but does not answer the ecological value assessment or the Tributary 4 passage decision. Attachment 1 describes cobbles and boulders in the lower reaches of both tributaries while concluding that habitat is unfavourable on the basis of minimal cobble habitat. AC does not dispute the conclusion but records that the habitat argument is weaker than stated.
3: Mangapū Stream Diversion				
3.1: Certainty of outcomes	High value stream to be realigned. The ability to achieve anticipated outcomes in realigned channel questioned by DOC and AC in s53 comments. Additional context provided by Applicant in Response to Comments.			Agreed - Colonisation sources are retained upstream in the Mangapū Tributary and in Tributary 2. - Staged livening is an appropriate mechanism and materially reduces temporal loss. - The channel design attributes set out in the SRMP (Appendix 16 characteristics) are appropriate in principle. Unresolved - Value equivalence is not demonstrated. The Applicant states the realigned riparian margin will necessarily be narrower than the existing riparian forest and will vary in width (Response p. 6), and DOC records the Applicant acknowledging that riparian vegetation will be managed to maintain haul road access and is not expected to achieve the same density or diversity (DOC s3.11). The existing riparian extent exceeds 20 m of mature woody vegetation; the realigned margin is 1 to 5 m on a shallow soil layer over rock. AC considers a residual loss of stream ecological value remains and is unaccounted for. - The realignment is to remediate the loss of existing stream. This remediation must achieve a no net loss of potential. This cannot be achieved with reduced riparian margins and use of the industry standard SEV tool to demonstrate ecological equivalence would likely demonstrate this. - The SRMP specifies an impermeable liner beneath the stream bed to prevent seepage into the cut rock, formed from compacted site-won clay fill, and elsewhere describes a low permeability stream liner. A lined bed cannot develop hyporheic exchange. The two specifications are not reconciled and the ecological consequence has not been assessed. - Large woody debris, a defining structural component of these watercourses, is not provided for in the design or the performance targets.
3.2: Monitoring conditions	Scope of monitoring indicators and target values. AC and DOC question the selection of monitoring indicators and target values in s53 comments. Additional rationale provided by Applicant in Response to Comments.			Agreed - Draft condition 68(j) now provides for baseline monitoring, turbidity and sediment deposition, water quality including dissolved oxygen and temperature, ecological monitoring, frequency, and timeframes and measures of success. Condition 68(k) requires management actions where measures of success are not met. AC supports this structure. Unresolved - MCI target. The reach to be replaced records MCI 115 (Band B) and QMCI 6.81 (Band A) at Site 3. Draft condition 67(a)(iii) sets a target of Band C or better. NPS-FM Table 14 Band C extends down to 90. The target therefore permits a substantial decline against the reach being replaced, and is inconsistent with the Applicant position that values will be maintained. The Applicant justifies it by reference to a catchment range of 105 to 125 (Response p. 8), while the

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				SRMP reports a range of 113 to 125 for the same reaches. AC seeks a target of Band B or better, or a target expressed relative to a defined pre-works baseline with a specified sampling regime. ● SEV. The Applicant states at Response p. 7 that design phase SEV is included in the proposed conditions. AC cannot locate it in draft conditions 67 or 68 of the 18 August set. AC seeks SEV at design and again post-livening, not as a compliance threshold but as the trigger for adaptive response, on the basis that SEV potential scores were the instrument used to size the aquatic offset. ● No fish or kōura monitoring is specified for the realigned channel. ● Ecological monitoring ceases at Year 10 if objectives are met (SRMP section 6.0), which is before riparian canopy development. AC seeks monitoring aligned to canopy development. ● Draft condition 67 requires verification on the phrase <i>achieves no net loss of value</i> in the 18 August text.
3.3: Stream Effects Management	Clarity of offset and compensation activities. AC and DOC question the selection of monitoring indicators and target values in s53 comments. Additional rationale provided by Applicant in Response to Comments.			Resolved in part ● AC accepts the corrections in Table 1 of the Response (pp. 21 to 22). On the revised Tranche 1 scope the offset requirement falls to approximately 3,427 square metres and 3,560 m, against a stated provision of 3,938 square metres and 3,590 m. ● AC records that the shortfall closes because the extent of the impact assessed has been reduced, not because the offset has been increased. Unresolved ● The provision offset value is unverified. No SEV has been undertaken at Meremere or Mangatawhiri. Offset widths and available extents are proxy derived. Table 28 of the Ecological Assessment reports only 1,610 m of offset stream available, at a mean width of 1.0 m, against a requirement that now stands at approximately 3,560 m. ● Appendix 15 is internally inconsistent. The text reports an ECR of 4.8 and the table 4.13. The measured SEV at the offset site (0.41, minus fauna) is stated in the text but 0.39 is used in the table. The text uses a potential score of 0.66 and the table 0.719. DOC records the same conflict (DOC Appendix 1, p. 20, footnote 10). AC seeks a single reconciled calculation. ● Wetland offset. Table 37 of the Ecological Assessment provides 2.51 ha, including 2 ha of wetland restoration on alluvial terraces in Hunua Regional Park. Table 1 of the Response lists approximately 0.15 ha at Meremere, approximately 0.5 ha at Hunua and 0.5 ha of farm pond removal at Hunua, totalling approximately 1.15 ha against an unchanged requirement of 2.4 ha. AC seeks confirmation of which package is proposed. ● Additionality of barrier remediation. Regulation 42(2) of the Freshwater Fisheries Regulations 1983 requires the occupier of land to maintain culverts so as to allow the free passage of fish. The Applicant states that it understands the barriers relied on carry no such duty (Response p. 17). AC seeks the basis for that conclusion for each barrier relied on as compensation. ● Extent traded for value. 1,157 m of stream extent is permanently lost. Reconnection restores access to existing habitat; it does not create extent. NPS-FM Appendix 7 requires positive effects that outweigh the adverse effects, and that comparison has not been quantified.

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				- Stream classification. The Applicant has reassessed Tributaries 3 and 4 and found the extent to be substantially greater than originally estimated (Response p. 8). The same reassessment has not been applied to other ephemeral to intermittent transitions within the footprint. - The application of an offset calculator is just one tool and doesn't determine if the offset is appropriate. Offsets need to consider the limits to offsetting (and question offsetting very high value ecosystems); how the offset will be delivered and will it actually work (governance, monitoring, adaptive management). The latter is critical where performance targets must have attributes that relate to no net loss of biodiversity and ecological function. - The applicant does not determine a good outcome for the realigned stream due to its reliance on riparian vegetation, however, is reliant on this feature for riparian planting for offsets in focus area 1.
4: Meremere Focus Area				
Proximity to impact site	Questioned by AC in s53 comments in relation to AUP Appendix 8. Further explanation provided by Applicant in Response to Comments.			Unresolved - The AUP appendix 8 statement: <i>Offset actions should be undertaken close to the location of development, where this will result in the best ecological outcome.</i> The second part of the sentence provides additional explanation to the initial statement. It is that offset must be close to the impact to achieve the best ecological outcome. - There is no demonstration that offsets could not be achieved closer to the impact. There is no direction that offsets should occur on land owned by the applicant. Meremere is a convenience, not an optimal offset site. - The 2014 Good Practice Guidance factors quoted by the Applicant include ecosystem function, local importance and future proofing. The Response addresses connectivity and proximity only. Meremere lies in a different ecological district, catchment, region and consenting jurisdiction. - Like-for-like is asserted at the level of regional forest type. No target ecosystem type, reference vegetation type or Singers classification is assigned to Focus Area 2, while the impacted communities are classified WF9 and WF11. AC seeks an express target ecosystem for the Focus Area 2 planting. - Durability. Meremere is within a Quarry Zone under the Waikato District Plan. AC supports draft condition 154 requiring conservation covenants under section 106 RMA and section 77 Reserves Act 1977. AC nevertheless records that this application itself proposes to relocate offset areas covenanted under the 2009 Symonds Hill consent, which demonstrates that covenants over quarry zoned land remain subject to later variation. AC concern is with the in perpetuity outcomes principle, not with the covenant mechanism. - No assessment against the Waikato regional planning documents has been provided for the proposed wetland and streamworks at Meremere.
5: Terrestrial effects management				
5.1: Application of BOAM	Selected attributes and effect on offset estimate.			Agreed

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	Questioned by AC in s53 comments. Rationale described by Applicant in Response to Comments.			- BOAM is the appropriate tool and the user manual permits indirect structural measures as surrogates. Unresolved - Offset site data. The Applicant confirms that plot sampling was not replicated at offset sites and that comprehensive wetland delineations were not undertaken for the Focus Areas (Response p. 10). The BOAM manual, as quoted by the Applicant at p. 3, instructs that parameters and values be empirically informed wherever possible and that unverifiable values be avoided. The gain side of the ledger is not empirically informed. This is the principal AC concern with the model. - Attributes AC considers would potentially increase rather than reduce the modelled requirement. In the least it would provide greater transparency and robustness in te assessment - Wetland type-for-type. Forest seepages are proposed to be offset by planted farm pond and alluvial terrace wetlands. The Response addresses area exchanged for condition but not ecosystem type. NPS-FM Appendix 6 requires like-for-like. Water table regime and hydric soil condition determine whether an offset can support seepage biota and are not in the model. This comment is also applicable to the terrestrial offset planting where the applicant acknowledges in the response that planting is not to achieve a like for like (section 8.008b). - Aggregation of seven impacted vegetation communities into two successional classes. The Applicant states the 95th percentile approach is conservative. AC cannot test that because the Appendix 13 workings are not legible in the version supplied. - The acknowledged 11.08 ha revegetation shortfall is to be met by compensation. AC accepts compensation is available for that purpose, but its adequacy depends on resolution of the points above. - The applicant response to AC technical memo states that <i>Only attributes that occur at both the impact and offset sites can be used in a BOAM</i>. However, for forest offset into pasture the applicant has used canopy height, leaf litter depth in the BOAM assessment – neither of which would likely score in pasture. These are rated zero in pasture. Canopy cover and basal area are also scored zero. Any existing values in the receiving environment are lost.
5.2: Timing of revegetation	Timing and sequencing of vegetation clearance and mitigation planting. Questioned by DOC in s53 comments, with request for planting to occur before clearance. Ecological Assessment refers to high level sequencing on page 112. Is further information required?			- The Applicant has accepted the DOC amendment. Draft condition 59(h) requires timeframes for the implementation of Site Specific Planting Plans before construction works occur in the staged area. - Tranche 1 of 59.82 ha commencing on grant, against 17.07 ha of clearance in Stages 1 to 4, provides real advance planting. AC supports this.
6: Additional issues				

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6.1: Threatened and at risk flora	Raised by AC in s53 comments and by DOC at s2.3. Applicant agreed at Response p. 5 that the Ecological Management Plan should be updated.			The Applicant has agreed that the Ecological Management Plan for Focus Areas 1 and 2 should include recovery and propagation of regionally at risk and threatened flora. Unresolved ● Draft condition 59 of the 18 August set does not contain that provision. AC seeks it as an express Ecological Management Plan content requirement, together with pre-clearance survey, salvage or propagule collection, and inclusion of the relevant species in planting schedules.
6.2: Dewatering effects above MALF	Raised by DOC and Dr McEwan in s53 comments. Applicant response at pp. 11 to 12 and 17 to 18.			AC accepts that maintenance of flows at or above MALF is appropriate for maintaining stream habitat extent, and does not seek a different augmentation trigger.
6.3: Water quality of augmentation flows	Raised by AC in s53 comments. Applicant response at pp. 5 to 6.			Resolved. Draft conditions 228(c) and (d) now require pH below the discharge point to be within one whole unit of the upstream value and turbidity change not to exceed 20 per cent between upstream and downstream points. AC accepts these amendments.