

1 Invited parties: Auckland Conservation Board

Table 1.1: Auckland Conservation Board comment received 24/09/25 summary and applicant response

Response prepared by Ecology experts Chris Wedding, Treff Barnett and Jennifer Shanks, with input from the Applicant.

Response No.	Name	Address	Comment summary	Applicant response
1.1.1.	Auckland Conservation Board (Chris Severne)	c/- Department of Conservation Private Bag 68908 Wellesley Street Auckland 1141	The primary potential impacts of the Proposal appear to be those due to removal of these important native vegetation blocks (in particular, in Significant Ecological Areas SEA_T_5323 and SEA_T_1177), and the subsequent impacts on native wildlife, especially lizards.	No response needed.
1.1.2.			The Proposal appears to have adequately addressed all the major environmental impacts expected during clearing and operation of the quarry, and has produced environmental management plans to minimise, ameliorate or provide ecological offset for these impacts on native wildlife. Most of these management plans appear to be adequate, but we support the amendments to the Lizard Management Plan (LMP) provided by the Department of Conservation (DOC). In particular, we endorse the DOC recommendation of a 10-year timeframe for the wildlife approval.	Wildlife approval timeframe discussed in the native lizard section below in Row 1.1.5.
1.1.3.			Based on the information currently available, it is therefore expected that there will be some major impacts on native vegetation, terrestrial/aquatic fauna and the environment, but these will be minimised IF all proposed measures to mitigate conservation impacts and restore indigenous ecosystem health across the project site are fully implemented. It appears hard to justify the claim that there will be a net ecological gain, given the certainty of some important wildlife destruction (including endangered rock forest), and uncertainties of the future success of lizard translocations and reforestation, particularly as it appears that the Hingaia Island offset planting will not now be undertaken.	The potential ecological effects have been comprehensively assessed in the Ecological Impact Assessment and supporting technical reports, using best-practice modelling approaches. These assessments recognise that there is always some inherent uncertainty, which has been factored into the models and offset calculations. The proposed conditions and Net Gain Delivery Plans include robust monitoring, reporting, and adaptive management measures (including biodiversity re-modelling and contingency planting/pest control actions) to detect and address any under-performance, to provide confidence that the required net biodiversity gain will be achieved.
1.1.4.			To maintain a minimal impact, there needs to be requirements and monitoring in place to ensure that all environmental management plans are actually implemented. As such, we strongly support the DOC call for greatly improved management plan conditions, to ensure that the Project is not reliant on “unenforceable, qualitative [mitigation] objectives” (DOC Wildlife Approval Report, section 6.7).	The Applicant agrees in principle. A revised set of conditions will follow at later stage.
			Required Conditions to the Proposal ACB provides a list of what recommendations should be among the Required Conditions for this Proposal to proceed, based largely on the recommendations included within both the Proposal’s environmental and ecological management plans, and the feedback on these from both DOC and iwi.	
1.1.5.			For Native Lizards: - the agreed Conditions listed in the LMP, including all DOC-recommended alterations, in particular: - a 10-year timeframe for the wildlife approval - inclusion of mouse control as part of pest control measures - more, and earlier-established eco-stack artificial habitats. Noting that the current LMP is appropriate for four species – the copper skink, ornate skink, elegant gecko, and forest gecko and additional mitigation conditions will need to be, developed for pacific gecko and striped skinks if these species are to be relocated.	Term of Approval: The Applicant acknowledges that DOC would expect the holder to apply for a variation beyond 10 years, which could provide for any improvements to best practice methods etc. The Applicant has requested that the initial term be provided for 15 years, to align with the indicative stage 1&2, which accommodates a contiguous strip of vegetation at the early stage of the Project. Mouse control: The Project has been assessed as having a low-level effect on native lizard values, due to the degraded condition of the forest fragments and low encounter rates of copper skinks as per the outcome of surveys. Further, copper skinks are regularly encountered in newly revegetated environments, including rough grasses on roadside berms and urban gardens. On this basis, application of mouse control to the 108 ha of proposed enhancement is not considered commensurate with the effect. The Applicant could consider localised mouse control as a trigger for unexpected / higher values. Ecostacks: The Applicant is happy to accommodate this: It is anticipated that such ecostacks would be provided by material onsite, and as such the earliest stages of the Project would rely on felled material to supply ecostacks, however stages 2-5 (years 1-15) may have a shorter advance provision than larger areas of forest fragment, which are not proposed to be removed until indicative stages 4

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				&5 (years 40+) by which time all offset planting, dense buffer planting around the current proposed release site, would be no less than 25 years old. Lizard species: It is anticipated that copper skinks, forest gecko and pacific gecko are most likely to be encountered, with the latter species potentially occurring in epiphytic vegetation that would be transferred with ecostacks to receptor sites. The Applicant requests that pacific gecko is also included in any wildlife approval associated with the Project.
1.1.6.			For bats: adequate surveillance, avoidance and provision of artificial roosts before vegetation removal	The EMP Bat Management Plan adopts DOC bat roost protocols and includes pre-work inspections by qualified bat specialists, activity checks where required, clearance sequencing to avoid roost risk, and provision and monitoring of artificial roosts when natural roosts are identified. These measures address ACB's request within the EMP framework.
1.1.7.			For avifauna: adequate surveillance and avoidance of nesting birds	The EMP includes pre-works nesting checks, mapped buffers, and timing restrictions around active nests, including karearea guidance. Post inspection reporting and any follow-up measures are also required. Ongoing predator and browser control and revegetation within the offset programme will improve avifaunal habitat over time.
1.1.8.			For freshwater fauna: - adequate capture and relocation plans for freshwater fauna - Sedimentation ponds and earth bunds must be put in place to ensure sediment does not flow into streams identified in the report. Regular checks are required to ensure no sediment flow is affecting aquatic life.	The EMP includes a detailed section on removal and relocation of freshwater fauna including native fish, kākahi and kōura. Sediment Retention Ponds and Decanting Earth Bunds are proposed along with other ESC measures during the construction works phase. Regular checks, monitoring and maintenance of all ESC is proposed and required under Conditions 22 –23.
1.1.9.			For vegetation: - adequate native revegetation and riparian planting is required in an attempt to replace some of the lost vegetation biodiversity values. - additional buffer planting and more comprehensive monitoring of planting success.	Offset scale and timing: The like-for-like offset programme is set out in REAR-TE section 2.1, including enhancement of approximately 108.35 ha surrounding the Sutton Block receiving area and 62ha of staged revegetation to counterbalance native vegetation loss over the quarry life. Performance targets and maintenance: The Planting Plan and REAR TE include rigorous performance measures such as canopy closure trajectories and plot-based monitoring and remedial planting obligations as required.
1.1.10.			For biosecurity: An adequate mammalian and pest weed control programme must be put in place, including for mice.	Programme in place: The NGDP PWC is the pest and weed control programme implementing landscape-scale predator control for rats, mustelids, and possum and ungulate browser control for deer, goats, and pigs, with trap networks, bait station layouts, service frequencies, and weed species treatment methods specified. Mouse control: As discussed above, the Applicant does not include mouse-specific control for ecological and feasibility reasons and instead maintain focus on key predators and browsers at scale, which directly improves recruitment and structural habitat for native fauna. Monitoring and reporting: The NGDP-PWC includes an annual programme and monitoring and reporting expectations to demonstrate delivery.
1.1.11.			For Cultural impacts: establish ongoing communication with the local Tangata whenua to ensure adequate protection of the historic Pa site, archaeological sites, and culturally significant vegetation sites.	Engagement: The NGDP PWC recognises consultation with mana whenua and the role of tangata whenua in guiding enhancement outcomes. Refer to proposed Condition 7 (Cultural Values), which requires the consent holder to provide mana whenua with opportunities to take and use any native trees felled as part of the Project, to comment on draft management plans prior to certification, to prepare a cultural management plan in partnership with the consent holder that records future engagement and partnership protocols, and to access Kaarearea Paa subject to health and safety requirements. Protection and enhancement near cultural sites: The offset and revegetation programme includes rock forest and appropriate revegetation within the wider enhancement area surrounding SEA-T-5323. Site-specific measures, including fencing, weed control, and browser control, protect culturally significant remnants while restoration plantings progressively strengthen those values over time. Ongoing coordination: The Applicant will continue to engage with mana whenua throughout staging, monitoring, and maintenance cycles so ecological works remain aligned with cultural values.