

1 Invited parties: Iwi

Table 1.1: Te Ākitai Waiohua comment received 24/09/25 summary and applicant response

Response prepared by the Applicant and Planners.

Response No.	Comment summary	Applicant response
1.1.1.	Structure Comments are provided by Te Ākitai Waiohua Settlement Trust (TAWST) but represent the views of Te Ākitai Waiohua including its kaitiaki organisations.	No response required.
1.1.2.	Cultural Values Assessment Te Ākitai Waiohua provided a Cultural Values Assessment (CVA) for the Project. The Project sits in the middle of a series of significant sites to Te Ākitai Waiohua, based around the natural maunga and waterways of the wider region. Te Ākitai Waiohua have a strong spiritual (Taha wairua) association with the land, which provides its people with a sense of meaning, connection and purpose. Drury is a region of significance to Te Ākitai Waiohua that provided access to the Manukau Harbour and its wealth of natural resources. Te Ākitai Waiohua is not against development. However, when development occurs, the expectation is for restoration and enhancement of te taiao to restore the mauri and leave it in a better state than it was before the development occurred. This is particularly important where development creates adverse effects; the mitigation and remediation must be commensurate with the impacts of development.	The Applicant thanks TAWST for the recent feedback and for the continued engagement on the Drury Quarry Expansion Fast-Track application. The Applicant deeply values the partnership with Te Ākitai Waiohua and acknowledges the cultural, environmental, and archaeological significance of this area. The Applicant is committed to a collaborative approach that upholds Te Ākitai Waiohua’s cultural values, kaitiakitanga, and mana motuhake throughout the life of the Project.
1.1.3.	Engagement on the fast-track application Te Ākitai Waiohua acknowledges the ongoing engagement by SAL since 2022, when consultation started on the proposal to expand the quarry into the Sutton Block. The record of engagement and summary of key concerns are a generally accurate reflection of previous feedback provided by the iwi. Te Ākitai Waiohua appreciates support from a planning consultant but highlights the challenge of engaging meaningfully due to the project's scale, tight timeframes, and multiple concurrent FTAA applications. They opposed the Fast Track Approvals Bill 2024.	No response required.
Comments [partly summarised]		
1.1.4.	Proposal As stated in the CVA addendum, Te Ākitai Waiohua opposes in principle the proposed activity of quarrying as it will have significant adverse cultural effects that cannot be avoided or fully mitigated. When consultation began, the Project was divided into four stages. Subsequently, the applicant chose to utilise the FTAA (included in Schedule 2) to develop a quarry in stages over a 50-year period. Te Ākitai Waiohua is concerned about the increased scale of impacts from the additional fifth stage of quarry expansion. While the project now offers more aggregate (250m tonnes vs. 149m) over the same 50-year period, it increases adverse effects without added benefits. The economic assessment identifies savings of \$29.4m per million tonnes of aggregate but these benefits are unchanged from the original four-stage proposal. The economic assessment does not address the increased environmental impacts as a cost of the Project.	The change in the quarry design from that which was originally consulted on with Te Ākitai Waiohua to the design that is now proposed as part of this Fast Track Application does result in a different level of effects but also benefits. The footprint size of the pit has increased from 88ha to 108ha, this has resulted in an increase in SEA vegetation removal and slightly more stream loss, but wetland loss remains unchanged. The ecological value of the additional area of SEA vegetation proposed to be removed as part of Stage 5 was predominately assessed as having low-moderate ecological value. The tonnes available for extraction has gone from 185 million tonnes to 240 million tonnes. This is an increase in resource of nearly 30%. Having the certainty of being able to access this extra volume now is crucial for the company’s long term planning, and also for ensuring that the Auckland Region has a “locked in” supply for the long term. While vegetation and stream loss has increased, the Project has also increased its ecological offset areas by approximately 30 ha of new planting, approximately 1,053m of additional onsite existing stream riparian planting and increased its commitments to pest and weed control, so that the Project is able to still result in an overall net gain. The impacts on the environment are addressed through various technical reports included within the application including numerous ecological reports. As part of considering these impacts, Net Gain Delivery Plans set out the proposed offset works, which will result in an improved overall environmental package, with a Net Gain delivered as part of the Project. Refer to the Applicant’s Response to Auckland Council – Economist review comments for an assessment of the potential economic effects of the proposed environmental effects prepared by Market Economics dated 1 October.
1.1.5.	Cultural values	The Applicant reiterates a commitment to early and meaningful engagement. To manage this additional workload, the Applicant has employed a Kaiarahi / Iwi Engagement Manager. Their role is to engage with all of the Applicant’s iwi partners and ensure that commitments made are followed through on.

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	The proposed activity of quarrying will have significant adverse cultural effects because the impacts on the whenua, awa and ngāhere cannot be avoided, remedied or fully mitigated. However, Te Ākitai Waiohū acknowledges measures undertaken to avoid impacts on Kaarearea Pā, which are supported. Conditions: Te Ākitai Waiohū supports conditions that seek to recognise cultural values including providing for: • Preparation of a cultural management plan • Development of cultural monitoring procedures • Mana Whenua taking and using native trees felled • The ability to comment on draft management plans • Copies of annual freshwater monitoring data being provided to Mana Whenua upon request • Access to Kaarearea Pā subject to health and safety requirements. Te Ākitai Waiohū does have concerns with draft Condition 7: While providing opportunities for Mana Whenua to be involved as a means to mitigate adverse effects on cultural values this draft condition lacks clarity and timeframes. It does not specify what the applicant is required to do to avoid, remedy or mitigate adverse effects on cultural values. Given the long timeframe of the Project, it is important to establish a clear and ongoing role for Mana Whenua. Further discussion is sought to amend conditions to address the following matters: • The consent holder must consult with Te Ākitai Waiohū • At least 6 months prior to commencement of construction activities the consent holder must invite Mana Whenua to prepare a Cultural Management Plan • Tikanga will be observed through a blessing of the land prior to each stage of works commencing • Ecological Management Plan and sub-plans must be developed in consultation with Mana Whenua given the significant impacts on ecology Draft Condition 10: Requires management plans to summarise comments received from Mana Whenua, and to identify where they have been incorporated and where not, the reasons why. While this approach is supported, Te Ākitai Waiohū seeks greater involvement in the development of management plans, particularly the Ecological Management Plan and sub-plans as these are essential to ensure that the adverse environmental impacts are sufficiently mitigated and te taiao is restored and enhanced.	The preparation of a Cultural Management Plan (CMP) (involving all mana whenua groups that wish to be involved) is provided for in condition 7 and covers all matters outlined by Te Ākitai Waiohū. In relation to Te Ākitai Waiohū's concerns relating to draft Conditions 7 and 10: • The Applicant has committed to engaging with all five iwi involved in the Project. They will all be invited to be involved in the preparation of the CMP. • The Applicant will amend the condition to ensure that at least 6 months prior to commencement of construction activities the consent holder must invite Mana Whenua to prepare a CMP. • Each stage is indicative and there is no specific moment when one stage finishes and another stage starts. Therefore, it would be difficult to undertake a blessing prior to each stage commencing. However, the Applicant will continue to engage with Te Ākitai Waiohū through the Project and the opportunity to invite mana whenua to undertake a blessing at appropriate milestones. • Ecological Management Plans have already been prepared as part of this application. The Applicant welcomes any feedback on these at any time and will formally request feedback as part of the CMP process.
1.1.6.	Archaeological remains of Māori origin Given the significance and historical occupation of Kaarearea Pā, further discoveries are likely, and Te Ākitai Waiohū does not support reliance on the NZHPT authority process. Recording information on archaeological discoveries does not mitigate adverse effects on cultural values caused by the destruction of archaeological sites. Te Ākitai Waiohū does not support conditions referencing the accidental discovery rules in the Unitary Plan E12.6.1. Specific Accidental Discovery Protocols should be agreed with Mana Whenua and set out in the conditions. With the current reforms and timeframe of the consents, there will be a new plan(s) with different rules and references. It will also be necessary for an agreed protocol to address tikanga Māori specific to the site. The provision for cultural monitoring to be undertaken at the commencement of works in Draft Condition 7 is acknowledged. Provisions should also be included for the cultural induction of contractors prior to any earthworks commencing. Te Ākitai Waiohū acknowledges that the archaeological authority under the NZHPT Act is only sought for stage 1, which is 0-3 years. The duration of the archaeological authority is expected to reflect the timeframe for stage 1. Future stages may also require authority prior to works commencing, and Te Ākitai Waiohū requests that any archaeological information gathered during previous stages be shared with Te Ākitai Waiohū prior to applying for future stages.	Condition 7(b) sets out that cultural monitoring procedures will be developed with mana whenua (which includes Te Ākitai Waiohū) and which includes steps to be taken in the event of any accidental discovery of tāonga or koiwi. We consider that this condition provides for the request to have agreed protocols and for these to have the ability to address tikanga Māori.

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1.1.7.	Ecology and biodiversity Offsetting approach The amount of indigenous vegetation and habitat, especially within Significant Ecological Areas (SEA), affected by the Project highlights a significant impact on the cultural landscape and values of Te Ākitai Waiohū. It is our preference that offsite mitigation occurs on the site or within the immediate environs of the area of impact. Te Ākitai Waiohū is concerned with the increased impact on indigenous vegetation and habitats from the fifth stage of the Project and is not satisfied that the impacts are sufficiently avoided, remedied or mitigated. The proposed restoration and enhancement planting throughout the Drury Quarry site, as well as the protection of remaining ngāhere and pest management, is acknowledged but does not compensate for the loss. It is acknowledged that some of the SEA is located within an area zoned for quarrying, but the Project expands the quarry beyond the Special Purpose Quarry Zone into the Mixed Rural Zone.	Where possible, the Applicant has tried to undertake all mitigation within the subject site. Where that was not possible, the Applicant undertook considerable investigations to find mitigation locations in the immediate environs. This included a request to all mana whenua to identify potential locations. As outlined in the Iwi Engagement Overview document (Appendix F, Volume 1) one iwi group did provide some options but unfortunately none were suitable, except Ngā Motu o Hingaia.
1.1.8.	Ecology and biodiversity Ngā Motu o Hingaia Ngā Motu o Hingaia (Drury Creek Islands) was identified as a potential offsite mitigation site but was originally discounted because it had no streams or wetlands. However, it was subsequently progressed as an option when the fifth stage was introduced as compensation mitigation because it would not be 'like-for-like'. In principle, Te Ākitai Waiohū supports the restoration and enhancement of Ngā Motu o Hingaia because it is within the site's catchment. The amended proposal removes the restoration planting on Ngā Motu o Hingaia and no additional offset planting is considered by the applicant, although there will be some reduction in ecological gains previously identified as part of the Project. Te Ākitai Waiohū seeks that offset mitigation at Ngā Motu o Hingaia be retained as an option to ensure that additional compensation mitigation is achieved for the added effects of stage 5. Conditions could identify that an alternative location must be identified if landowner approval is not provided. Given that the applicant no longer considers offsite mitigation as a requirement, it should not be an issue to undertake the work in good faith without landowner approval at this time.	The Applicant agrees that the proposed planting on Ngā Motu o Hingaia is a worthy restoration and enhancement project. Unfortunately, the landowner (DOC) could not provide landowner approval. The Applicant understood this was because Te Ākitai Waiohū (as part of the governance group for the islands) were reluctant to support the proposal and therefore it was removed from the restoration and enhancement package. If Te Ākitai Waiohū are now in a position whereby they support this area being restored through the restoration and enhancement process, then the Applicant welcomes Te Ākitai Waiohū confirming that. The Applicant is prepared to consider offering to still undertake this restoration work Ngā Motu o Hingaia, which would be above and beyond what is required as part of the offset package, but only if landowner approval is forthcoming from DOC within a set timeframe. A condition to this effect will be proposed.
1.1.9.	Ecology and biodiversity Draft conditions 52-54 Draft conditions 52-54 require 'net gain' to offset loss of vegetation and habitats, and are supported in principle as they provide clear expectations and requirements. However, Te Ākitai Waiohū is concerned about the reduced 'net gain' benefits. The reduced offset planting target for kānuka from 22ha to 17.6ha is not supported because of the increased impacts on kānuka from stage 5. It is not adequate to rely on conditions that require a 10-year review of biodiversity offset to assess whether modelled targets are being met and then to enable additional offset planting if the targets are not being met. Review conditions are supported by Te Ākitai Waiohū but not to determine whether sufficient mitigation is achieved. Te Ākitai Waiohū supports buffer planting of newly created edges in addition to any offset mitigation planting, monitoring of planting for 5 years, using monitoring information to assess the effectiveness of ecological enhancements as well as restoration and enhancement measures for the remaining forest areas, including through pest control, to improve local connectivity and ecological values.	The review of biodiversity offsets is appropriate and recognised as best practice when drafting conditions. By reviewing at set timeframes, it allows for an actual assessment to be undertaken to determine if the modelled results are being realised. At this point adjustments can be made to ensure the overall objective of net gain will be achieved. Buffer planting is proposed to screen the quarry from the local vicinity, including along the western extent of the final pit, behind the northern bund, and around the full eastern and southern perimeter, where ecological offset planting is proposed. Both the landscape and visual mitigation planting and the ecological offset planting will be monitored to ensure that visual screening and ecological enhancement objectives are achieved. The proposed revegetation and forest enhancement works are designed to connect isolated remnants of rock forest, restore degraded habitats, and provide a continuous forest tract between Kaarearea Paa SEA_T_5349 and SEA_T_5323 located to the east and north of the Sutton Block. In total, this will create approximately 680 hectares of connected indigenous forest and habitat, significantly improving the extent, quality, and connectivity of local biodiversity.
1.1.10.	Ecology and biodiversity Draft Condition 98 Draft Condition 98 requires restoration planting to be implemented in the planting season immediately following the completion of staged vegetation removal works, but only lists stages 1-3 (30 years). It is assumed that this is because the consent duration is 35 years and therefore conditions cannot require implementation beyond that timeframe. Te Ākitai Waiohū does not consider it appropriate to approve the Project for 5-stages, when new consents will be required after 35 years and additional stages could be included then.	All planting will be completed within 16 years, which is well within the duration of the consents and allows for 19 years of monitoring to occur within the 35 year biodiversity offset timeframe.

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1.1.11.	Streams and wetlands As stated in the CVA, Te Ākitai Waiohū opposes reclamation or diversion of streams and wetlands. Where reclamation occurs Te Ākitai Waiohū seeks significant enhancement of te taiao, including any impacts on the downstream flows to protect the health and wellbeing of the awa and associated habitats. Proposed loss The original proposal sought to divert the upper reaches of Stream 2, maintaining catchment flows downstream. However, with the inclusion of stage 5, the upper reaches of Stream 2 would be reclaimed entirely. There is no additional wetland loss as a result of the fifth stage. Total stream loss from the Project is identified at 3,441 linear metres, compared to 2,643 linear metres under the original four-stage proposal. The total stream loss is a significant adverse effect, one that could be minimised by reducing the scale of the Project to four stages.	Due to the nature and scale of the Project, location of the in-situ resource and location of the Special Purpose Quarry Zone, avoidance of all stream and wetland reclamation and associated vegetation removal is not possible. While stream loss has increased, the Project has also increased its ecological offset areas (approximately 60 ha of planting and approximately 1,053 m of additional onsite existing stream riparian planting) as well as an increase in pest and weed control commitments, so that the Project is able to still result in an overall net gain. The impacts on the environment are addressed through various technical reports included within the application, including numerous ecological reports. As part of considering these impacts, Net Gain Delivery Plans set out the proposed offset works, which will result in an improved overall environmental package, with a Net Gain delivered as part of the Project. Further, an augmentation programme is proposed to ensure that catchment flows are maintained downstream.
1.1.12.	Streams and wetlands Mitigation and enhancement approaches Offsite mitigation should occur as close as possible to the area of impact. Enhancement and restoration benefits from onsite streams, along with the offsite mitigation proposed at 86 Friedlander Road in Tuakau are acknowledged. However, the offsite mitigation alongside the Waikato River occurs within an entirely different catchment. Therefore, impacts on the catchment where the Project is located will not be sufficiently mitigated. Amongst other things, Te Ākitai Waiohū seeks the inclusion of offset mitigation targets for the loss of streams and wetlands as a condition of consent. It is noted that draft conditions require Net Gain Delivery Plans for Riparian Planting and Wetland Planting, which are supported, but targets are sought to provide clarity of outcomes to be delivered.	Where possible, the Applicant has tried to undertake all mitigation within the subject site. Where that was not possible, the Applicant undertook considerable investigations to find mitigation locations in the immediate environs. This included a request to all mana whenua to identify potential nearby locations. As outlined in the Iwi Engagement Overview document (Appendix F, Volume 1) one iwi did provide some options but unfortunately none were suitable, except Ngā Motu o Hingaia. Conditions 105-106 set out processes for monitoring and reporting on offset planting. This includes a requirement to set out whether the planting is achieving the modelled targets of the REAR-TE. Therefore, targets do already exist and are referenced in the condition set.
1.1.13.	Groundwater Te Ākitai Waiohū understands that the Sutton pit is designed to be outside the mapped boundary of Kaarearea Pā and related lava flows, therefore avoiding drawdown effects on the shallow or perched groundwater system or lava flows. The Project seeks approval for a maximum groundwater take of 19,426m³ per day and 7,090,517m³ per year, which reflects the maximum take for Stage 5 (40-50 years). Te Ākitai Waiohū is concerned about the impacts of the groundwater take on the baseflow of streams. The applicant proposes to augment several streams (NT-1, Maketu, Mangawheau and Hingaia Tributary) where monitored flows are identified below 200% of the site's mean annual low flow. It is important to recognise the effect of groundwater take in combination with the loss of streams and wetlands, which are significant. Draft Condition 134 provides for the maximum groundwater take and does not identify the ranges required by each stage. This approach is not supported by Te Ākitai Waiohū and water take quantities should relate to the groundwater inflow limits of each stage as per the groundwater assessment to ensure that the minimum amount of groundwater is taken at any one time to minimise adverse effects.	While Condition 134 identifies the maximum groundwater take sought, it is important to note that this is a limit applying at full development (Stage 5) and does not mean that this volume will be taken at once. Conditions 140–142 require a staged drawdown in three steps (to RL90m, RL60m, and RL60m), with at least two years between each stage and technical reviews before advancing. This ensures the groundwater take is progressive, closely monitored, and adaptively managed, rather than occurring all at once. Similarly, stream augmentation is only triggered once flow thresholds and sump levels are reached, and monitoring indicates potential influence from dewatering.
1.1.14.	Rehabilitation Te Ākitai Waiohū expects the Sutton Block to be rehabilitated once quarrying operations are complete. This step is crucial to remedying the overall effects of quarrying on te taiao and the broader cultural values of Te Ākitai Waiohū. The application does not fully address expected and agreed outcomes for rehabilitation to remedy the significant impacts of quarrying on te taiao. It was understood that a Closure and Rehabilitation Management Plan (CRMP) would be submitted to Auckland Council for approval at least 12 months before extraction ends. Draft condition 62(e) now requires Closure and rehabilitation plans to be included in the Quarry Management Plan within 5 years of confirmed closure, but no further details are provided in the conditions to clarify the outcomes to be achieved.	There are no proposed or known rehabilitation works for the Sutton Block pit. As noted, Condition 66(g) requires the Quarry Management Plan to be updated with closure and rehabilitation details within five years of closure being confirmed. In addition, Condition 7(a) provides for mana whenua to prepare a CMP in conjunction with the Applicant. This condition allows for the opportunity for mana whenua involvement in the future closure and rehabilitation planning for the site. The Applicant affirms a commitment to an ongoing partnership with mana whenua to ensure meaningful and enduring outcomes for te Taiao.

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	Te Ākitai Waiohua seeks further engagement around the principles and high-level outcomes for rehabilitation, and a condition of consent confirming that the CRMP will be developed in collaboration with and approval of Te Ākitai Waiohua to satisfy iwi kaitiaki obligations.	
1.1.15.	Draft Conditions It is critical that the conditions incorporate opportunities for Te Akitai Waiohua to exercise kaitiakitanga and mana motuhake within this significant area of its rohe. Te Ākitai Waiohua requires assurances that conditions are effective and enforceable over the duration of the Project to ensure that adverse impacts are sufficiently mitigated. Initial comments are provided on the draft conditions in Attachment 1 as a starting point for further kōrero and participation in refining the final set of conditions. Greater certainty and clarity on the requirements of conditions, particularly those that will be implemented over the long term, will ensure expectations are understood and implemented by all parties. Te Akitai Waiohua seeks the opportunity to work through the conditions with the applicant to ensure the issues raised have been fully addressed.	The Applicant appreciates TAWST your advocacy for transparent, enforceable conditions. The condition set refers out to Management Plans, including the CMP and Ecological Management Plans which mana whenua are able to contribute to and help shape as provided for in Condition 7. This is considered appropriate and provides for clear and robust opportunities for mana whenua involvement in the Project, both now and into the future. The Applicant also notes that no Attachment 1 was received as part of Te Akitai Waiohua comments on the application. In response to various Panel and invited parties comments, the Applicant will be providing updated conditions to the Panel, and they will be available on the EPA website.
1.1.16.	Conclusion Te Ākitai Waiohua have reviewed the fast-track application and opposes in principle the proposed activity of quarrying as it will have significant adverse impacts that cannot be avoided or fully mitigated. The primary concern is Stage 5 of the Project, as it does not appear to contribute significantly greater benefits but results in significantly more adverse impacts. Ongoing commitment is sought from SAL to engage with Te Ākitai Waiohua to ensure that the Drury Quarry Expansion respects and reflects the cultural values and aspirations of Mana Whenua.	The Applicant affirms ongoing commitment to engage with all mana whenua to ensure that the Drury Quarry Expansion respects and reflects the cultural values and aspirations of Mana Whenua.