UNDER THE FAST-TRACK APPROVALS ACT 2024

FTAA-2603-1185

UNDER the Fast-track Approvals Act 2024

AND

IN THE MATTER of approvals for resource consents, wildlife approvals, an archaeological authority and complex fish passage approvals under the FTAA by Winstone Aggregates for the **Hunua Quarry Development**

MEMORANDUM OF COUNSEL FOR APPLICANT IN RESPONSE TO THE DEPARTMENT OF CONSERVATIONS REQUEST FOR CORRECTIONS

10 November 2026

PHERNNE TANCOCK

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MAY IT PLEASE THE PANEL:

1. On 9 November, Ms Burns provided the Applicant with a letter dated 9 November 2026 from the Department of Conservation to the Panel, requesting an amendment to condition 1 (c) of Appendix H: Complex Freshwater Fisheries Activity Approval Conditions. The Panel sought the Applicant's view on the changes requested by the Department.

2. The Applicant is grateful to the Panel for the opportunity to comment on that request. The Applicant notes that the changes arose from discussions about the culverts affecting upstream ecological values and associated loss during the processing of the application. The Applicant agrees that condition 1(c) of Appendix H: Complex Freshwater Fisheries Activity Approval needs updating to reflect that change, in a manner that is consistent with the Panel's decision.

3. The Applicant requests that the error be rectified by the Panel by amending condition 1(c) in the following way:

> (c) plans identifying the locations where salvage of fish and koura will be undertaken and in ~~Tributary~~ Tributaries 3 and 4 restrict salvage to culvert installation sites only at Stage 2;~~and culvert installation sites and upstream reaches of Tributary 4 during Stage 2;~~



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P TANCOCK
Counsel for the Applicant

Dated 10 November 2026