

16 January 2026

Mujahid Musa
Environmental Protection Authority
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Takitimu North Link – Stage 2

Dear Mujahid

As part of the preparation for the ecology expert conferencing next week, it has become apparent that there is an error in Attachment 2 to NZTA's Response to Comments from Bay of Plenty Regional Council (Assigned comment number 16.9). NZ Transport Agency as Applicant kindly requests that the sentence as indicated in red strikethrough below be deleted.

Assigned comment number	Page or section reference	Topic	Extracts (or summary, where specified)	NZTA response to comments
Commenter 16 – Bay of Plenty Regional Council – 9 December				
16.9	Section 5.4	Compensation and offsetting moderate value wetlands	<p><i>Moderate Value Wetlands: The offsetting for the loss of wetland extent from moderate value wetlands at a ratio of 1:2 (loss: creation) is supported. The alternative of 1:1:1 (loss: creation: restoration) is not supported. Restoration is not equivalent to wetland creation as it still results in a net loss of wetland extent overall. If restoration is used, the ratio should be higher and should reflect the type/intensity of restoration undertaken. Maintenance of restored areas must continue for the duration of the consent, or longer, as restoration gains typically diminish once maintenance ceases and pests reinvade.</i></p> <p>...</p> <p><i>If restoration is included in the alternative offset ratio for moderate value wetlands, then it should be at a higher rate than 1:1:1 (wetland loss: creation: restoration). If restoration is used to offset loss of wetland area then this will result in a net loss of wetland extent from an Ecological District with only ~5.9% of its original freshwater wetlands remaining.</i></p>	<p>NZTA disagrees with the statements made by BOPRC.</p> <p>NZTA acknowledges that there are differing expert opinions regarding the appropriate offset ratios for impacts on low and moderate value wetlands. The offset ratios proposed by Mr Blayney (1:1 for low value (wetland loss: creation) and 1:2 or 1:1:1 (wetland loss : creation: enhancement) for moderate value wetlands) are based on expert ecological assessment and are considered sufficient to address the identified effects. BOPRC support NZTA's proposed 1:1 for low value and 1:2 for moderate values. BOPRC does not support the alternative of 1:1:1 (wetland loss: creation: enhancement) for moderate value wetlands, and proposes, if restoration is to be included, to have a 1:1:3 ratio. Mr Blayney maintains that the ratios proposed are wholly appropriate and are based on professional opinion with regard to the type, composition, and condition of the wetlands impacted and the ability to recreated equal or greater values in wetland creation and/or restoration areas. BOPC also agrees that the ratios proposed by NZTA are appropriate.</p> <p>Any additional offset/compensation on top of that proposed by NZTA would be "more onerous than necessary" to mitigate the effects of the Project and would impose significant additional costs on NZTA, contrary to the purpose of the FTAA.</p> <p>NZTA therefore disagrees with BOPRC's comments and opposes the additional requirement sought.</p>

Yours sincerely

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