

## Invited parties' comments received on 27/11/2025, summary and the applicant response

**Table 1: Summary of comments received seeking an amendment to conditions and the applicant's response 4 December 2025**

Response No.	Condition number	Comment summary	Applicant response
<b>Name of commentator: Department of Conservation</b> <b>Comments on draft conditions of Wildlife Act approval</b>			
1	1 (a)	<p>As outlined in section 443.3 of the draft decision document and the Department of Conservation's (DoC) section 51 report, DOC considers that approval should be restricted to copper skink, ornate skink, elegant gecko, and forest gecko.</p> <p>In relation to Pacific gecko, DoC determined that the mitigation measures proposed were not sufficient nor appropriate for this species. Additional measures were discussed with the applicant. Subject to the Lizard Management Plan (LMP) being updated to include these measures, DoC confirmed with the applicant (in an email exchange dated 29 September) that all species could be included. However, the version of the LMP attached to the draft decision report does not reflect these agreed changes, nor does it address the matters outlined in section 443.5 of the draft decision report. In the absence of the LMP being updated, it is DOC's position that approval should not be given for Pacific gecko.</p>	<p>A copy of the revised Lizard Management Plan dated 31 October 2025 is attached. This version of the EMP is also now referenced in the updated Resource Consent Conditions in Table 1. The changes reflect updates previously agreed with DoC, including:</p> <ul style="list-style-type: none"> <li><b>Ecostacks (Section 5.3.2.1):</b> Added a requirement for five additional eco-stacks to be built at the end of each stage. This ensures habitat enhancement ahead of the next stage. Stage 1 will rely on felled material to provide eco-stacks.</li> <li><b>Mouse Control (Section 5.3.2.2):</b> Added a mouse control programme triggered as set out in Table 8 (Pacific gecko relocation or high lizard numbers).</li> </ul> <p>On this basis, the Applicant seeks to retain Pacific Gecko on the Wildlife Approval.</p>
2	1 (c)	DoC notes that 17 July 2025 version of the LMP does not reflect recommendations discussed in section 443.5 of the draft decision document. In order to be consistent with DOC's recommendations, the LMP would need to be updated.	
3	6	Add in the Direction -General's address provided by DoC	Condition 6 has been updated to include the Director Generals address.
4	12	DoC suggest the addition of an additional paragraph (12.2) for clarification purposes	Paragraph 12.2 added to the revised condition set.
<b>Name of commentator: Department of Conservation</b> <b>Comments on draft conditions of resource consent</b>			
1	1	DoC notes there is reference to two versions of the Ecological Management Plan, one dated 17/01/2025 and the other 17/07/2025. Reference to the 17/01/2025 Ecological Management Plan should be removed as this does not account for changes to section 5.	The EMP dated 17/07/2025 has been removed from condition 1 and the dated updated to 31 October 2025 to reflect the amendments discussed in rows 1-2 above.
2	14	Works should not proceed prior to certification of management plans. DoC notes that certification should be on the basis that the management plan meets its parent condition(s) rather than a subjective view as to what issues are "discrete" or of "minor consequence." Such an approach undermines the consent conditions.	<p>The Applicant does not agree with the suggested changes and seeks to retain the wording of these conditions as drafted in the condition set provided to the Panel on 27 November 2025.</p> <p>The Applicant notes that the original wording of these conditions is supported by Auckland Council.</p>
3	18, 19	Amendments within management plans should not change the objectives or the degree to which the adverse effect will be managed (i.e., should not provide for less mitigation that results in more residual adverse effect than is accounted for in the offset package, or less gain from an offset proposal, or less protection (and avoidance) of specific values and features.	
4	20	DoC recommends Condition 20 be deleted. The qualifier does not provide certainty that amendments to Management Plans will not undermine objectives or performance targets.	<p>The Applicant disagrees that Condition 20 should be deleted. It appropriately ensures that any amendments remain consistent with the objectives and requirements of the Management or Monitoring Plan, maintaining certainty while allowing necessary flexibility.</p> <p>The Applicant notes that this condition, as originally drafted, is supported by Auckland Council.</p>

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5	21	Add in “and applicable consent condition(s)”	<p>The Applicant does not support the addition of the wording “and applicable consent condition(s)” to Condition 21. The current condition already requires that any amendment be certified as meeting the objectives and performance requirements of the relevant Plan, which inherently ensures consistency with the consent conditions. Including this additional phrase is unnecessary, and does not add any further clarity or benefit to the certification process.</p> <p>The Applicant notes that this condition, as originally drafted, is supported by Auckland Council.</p>
6	22-24	DoC recommends Conditions 22, 23 and 24 be deleted. It is unclear what these conditions add. Conditions 18 and 19 provide for amendment of management plans in accordance with Condition 13 and 15.	<p>The Applicant does not support the removal of Conditions 22-24. These conditions allow for Management or Monitoring plans to be partial certified where there are discrete issues that are of minor consequence for the management of effects.</p> <p>The Applicant notes that this condition, as originally drafted, is supported by Auckland Council.</p>
7	29	DoC suggests amendment to improve clarity and enforceability of extent of diversion. If minor flexibility is required in relation to the 115m, then a percentage deviation could be added. An additional clause has been added to trigger further action if diverted channel is not performing (not achieving natural flow and velocity).	<p>The Applicant does not support the amendments to Condition 29. Having the works described as “approximately 115 m of stream diversion” and “as far as practicable” is appropriate and provides necessary flexibility.</p> <p>The Applicant notes that this condition, as originally drafted, is supported by Auckland Council.</p>
8	31	DoC has included an amendment to specify the length of stream diversion to 115m. Addition of figure is recommended for clarity.	The Applicant does not agree to the inclusion of “115m” added to the Streamworks Management Plan objective. This management plan also applies to temporary stream diversions to enable the access road to be built. The 115m only applies to the permanent stream diversion upstream.
9	51	<p>DoC recommend the inclusion of a cap on loss of habitat and vegetation extent in accordance with application documents recommended for clarity and enforceability.</p> <p>These clauses are included to recognise the EMP will manage effects on habitat for fauna outside of the areas specified in 46(a)(i) - (v) and will manage edge effects on remaining/adjacent vegetation and habitat.</p> <p>DoC also recommend deleting 51(b), 51(c) and 51(d) in the draft conditions because they are captured in other subclauses as recommended by DoC.</p>	<p>The Applicant does not support the requested changes to the Ecological Management Plan (EMP) objective. The proposed additions proposed by DoC introduce unnecessary detail that is already addressed within the EMP required under Condition 1, which will form the basis of the certified plan. This level of detail is more appropriately contained within the technical reports referenced in Condition 1. As previously noted by the Applicant during mediation, including excessive or duplicative information within the conditions leads to unnecessary repetition, reduces clarity, and lengthens the conditions without achieving any improvement in environmental outcomes. These changes are considered to be more onerous than necessary.</p> <p>In addition, the requests DoC are seeking include offsetting which is covered under the REAR: TE, not the EMP, it has removed reference to freshwater values or habits and matters (c ) and (d) (i) repeat themselves.</p>
10	53	DoC recommend an amendment to 53(a)(i) to clarify full extent of minimum EMP content. Note condition in 53(a)(ii) may need to be updated to reflect recommended changes to conditions identified below.	The Applicant disagrees with the requested amendments to Condition 53(a)(i). The suggested wording relies on excessive detail being included in the objective, which the Applicant considers unnecessary (refer to row 9 above).
11	62	DoC suggest amendments to Condition 62 to add reference to “dewatering”, “diversion” or “general” instream works. Relocation of native fauna should occur prior to any hydrological effects. Diversion is assumed to be in scope of instream works but is explicitly mentioned for completeness.	The Applicant accepts the requested changes and has made changes to the updated condition set to reflect this.
12	63	DoC recommends new clause 63(a) for clarity and to facilitate monitoring. DoC recommends new clause 63(i) to integrate with freshwater fish requirements and to ensure appropriate management of effects on native freshwater fauna.	The Applicant accepts the requested changes to Condition 63(a) but does not support the inclusion of Condition 63(i). Native fish are not covered by the Wildlife Act, and this Site is not DoC administered land. The catching of native fish is permitted.
13	63A	DoC recommends a new condition 63A to require a SQEP to supervise the recovery and relocation of native freshwater fauna in accordance with the NFFMP.	The Applicant supports the inclusion of Condition 63A. This has been adopted in the updated condition set.
14	64	DoC suggest amendments to Condition 64 Edge Effects Management Plan (EEMP) objective to draw on the intent as set out in the application documents and brings those commitments into conditions for clarity, and require ongoing commitments to maintain the mitigation measures.	The Applicant supports the amended wording to the EEMP, with a slight wording change to “buffer planting” instead of “infill planting” to be consistent with the terms used in the EEMP and throughout the conditions.
15	64A	DoC recommends a new condition 64A for the same reasons provided in row 14 as well as the inclusion of 64A(e) to require ongoing commitments to maintain the mitigation measures.	The Applicant does not support the recommended new condition 64A. The proposed additions introduce unnecessary detail that is already addressed in the technical reports listed in Condition 1, which the EEMP must be prepared in accordance with. Further, the timing listed in (a) is not correct. Figure 2 shows that the final pit edge, where vegetation may suffer edge effects, will not occur until Stage 5. It is considered unduly onerous to have to put buffer fencing or planting decades in advance. The requirement for planting 1-year post-planting to achieve a 90% survival rate is considered to be more onerous than necessary. The Applicant proposed to add the requirement that maintenance continues until at least 80% canopy closure and a minimum plant survival rate of 90% of the original planting density has been achieved. The maintenance period must be a minimum of five (5) years, or until 80% canopy closure is achieved (whichever occurs first), and must include the replacement of plants that do not survive. The



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			Applicant does not accept the “no environmental pest plant species present”. The term environmental pest plant species is considered vague and would need to be defined.
16	65	The EEMP states (page 19) that the infill planting should be included in the broader planting maintenance and reporting programme. DOC recommends some amendments for clarity and specific mention of infill planting in clause 65(e).	The Applicant has accepted some of the requested changes as reflected in the updated condition set. Other changes were considered unnecessary and better places to sit within the accompanying technical reports.
17	66	DoC recommend amendments to: <ul style="list-style-type: none"> <li>improve enforceability and to improve chances of success by having specified times and targets for assessment. Times and targets are drawn from the draft condition below but set out in what is recommended as a clearer sequence.</li> <li>to use consistent wording as in condition 1 and the glossary.</li> <li>align with 20 year targets in the REAR-TE</li> </ul>	The Applicant has accepted in part some of the requested changes to the Sutton Block Riparian Planting Plan (SRPP) objective. Other suggested changes were considered unnecessary and better placed in accompany technical reports.
18	66A	A new condition (condition 66A) is suggested for clarity, incorporating part of the original condition.	The Applicant does not support the inclusion of a new condition 66A for the same reasons provided in row 9 above. Further, as mentioned in row 15 above, the requirement for planting 1-year post-planting to achieve a 90% survival rate is considered to be more onerous than necessary. Further, fencing should only be required where stock is present. The Applicant considers there is no need to fence the riparian planting areas between the planting and the pit or if there is a fence in place further away. The current drafting allows for such matters to be appropriately managed through the Management Plan.
19	67	DoC suggests amendments to the SRPP management plan requirements to better align with the condition with their suggested amendments to the objective of the SRPP.	The Applicant does not support the suggested changes to the SRPP Management Plan requirements for the reasons stated in row 9 above.
20	67A	DoC requests a new condition 67A for clarity and to better align with the condition to the objective of the SRPP.	The Applicant does not support new condition 67A. The Applicant considers this better placed as a requirement under condition 67(h) (as originally drafted).  The Applicant notes that the original wording of this condition is supported by Auckland Council.
21	68	DoC suggests amendments to: <ul style="list-style-type: none"> <li>Include contingency measures here than rather relying on the reporting conditions as they only lock monitoring results into reports and do not require implementation of the contingency actions.</li> <li>Remove reference to contingency measures that do not address failed pest and weed management.</li> <li>Provide explicit reference to relevant offset targets.</li> <li>Ensure protection of values is in perpetuity.</li> </ul>	The Applicant does not support the requested changes to the Net Gain Delivery Plan: Pest and Weed Control (NGDP:PWC) objective for the same reasons given in row 9 above.
22	69	DoC suggests amendments to: <ul style="list-style-type: none"> <li>Provide consistency between pest plant and environmental weeds.</li> <li>Improve clarity and enforceability by making explicit reference to targets.</li> </ul> DoC recommend deleting clauses 69(e) and 69(f) and in the draft conditions because they are captured in other subclauses as recommended here.	The Applicant does not support the requested changes to the NGDP:PWC requirements for the same reasons given in row 9 above.
23	70	DoC suggests amendments to the Net Gain Delivery Plan: Planting Plan (NGDP:PP) objective to improve clarity and enforceability by making explicit the times, targets and requirements (such as protection in perpetuity) in order to better enable and require the objectives of the NGD:PP to be achieved and ensure protection in perpetuity	The Applicant does not support the requested changes to the NGDP:PP objective for the same reasons given in row 9 above.
24	70A		
25	70B		The Applicant does not support proposed new Condition 70B for the same reasons stated in row 20 above.
26	Table 2	Change table heading to refer to “Planting extents” instead of “Planting rates “	The Applicant agrees “Planting extents” is more appropriate than Planting rates. This change has been adopted.
27	72	DoC suggests amendments to: <ul style="list-style-type: none"> <li>Improve clarity and better reflect the intent of the NGDP:PP</li> <li>In 72(i) requirement to replace plants where necessary to assist with ensuring the 80% canopy cover will be achieved.</li> </ul> DoC note that the targets for canopy cover in the REAR:TE (Tables 41 and 44) do not reach 80% for any of the three vegetation types. Further redrafting of subclause (i) may be needed to align these.	The Applicant does not support the requested changes to the NGDP:PP plan requirements for the same reasons given in row 9 above.

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28	73	DoC recommend the deletion of condition 73, noting that the condition is unclear. The offset proposal was evaluated over a longer time horizon than 10 years. Further, not all the pioneer planting is happening until year 16. It is also inconsistent with the five-yearly monitoring programme and contingency measures.  The condition above (condition 72) should still allow for re-evaluation of the offset based on how much gain they generate by planting in advance.	The Applicant seeks to retain this condition but has amended the timeframe to 15 years from 10 years. This condition was offered by the Applicant once Hingaia Island Planting was removed from the offset package, as landowner approval has not yet been obtained.  This condition requires the Consent Holder to assess the biodiversity offset to determine whether the modelled targets in the REAR-TE have been met. If the assessment shows that the net gain from offset planting has not been achieved within six months of the 10-year anniversary, the Consent Holder must submit an amended NDGP:PP. The amendment must show where additional planting will occur and how the modelled targets will be met.  Condition 73(m) differs in that it allows for re-modelling at Year 10 to account for any unmodelled gains from planting completed before vegetation loss. This enables adjustments to future planting requirements—either increasing or decreasing them—as aligned with the BOAM model.
29	74	DoC suggests amendments to:	The Applicant does not support the requested changes to the Net Gain Delivery Plan: Riparian Planting (NGDP:RP) objective or NGDP:RP requirements for the same reasons given in row 9 above.
30	74A	<ul style="list-style-type: none"> <li>improve clarity and enforceability by adding the targets to the condition.</li> <li>establish timeframes for achieving and maintaining the SEV values.</li> </ul>	
31	75	DoC recommend the deletion of subclause 75(c) as this is duplicated in condition 77.	The Applicant seeks to retain condition 75(c) and does not consider there is a duplication issue. Rather condition 75(c) relates to NGDP:RP and 78(c) to the Net Gain Delivery Plan: Wetland Planting (NGDP:WP).
32	76	Additional objective included to require the ecological uplift set out in the REAR:SW to be achieved.	The Applicant does not accept the changes to the Net Gain Delivery Plan: Wetland Planting (NGDP:WP) objective for the same reasons provided in row 9.
33	76A	DoC suggests amendments to improve clarity and enforceability by adding the targets to the condition.  There appears to be a discrepancy between the wetland restoration area in 77 (a) and the number in Table 15 of the REAR:SW (4.04 ha).  DoC queries the provision in Table 15 for 20% cover of exotic species within the offset wetland at year 10. It should be made clear that this exotic presence cannot be environmental weed species. It is recommended this be clarified.	The Applicant has amended the condition to correctly reference 4.04 ha of wetland. The Applicant does not support the other requested changes to the NGDP:WP for the same reasons stated in row 9 above.
34	77	DoC suggests amendments to improve clarify and enforceability.	The amendment to NGDP:WP at condition 77 (b)(vi) is not supported by the Applicant. The Applicant considers the original wording provides clear, measurable timeframe and mechanism for achieving successful vegetation establishment, rather than relying solely on a static 80% ground-cover target.
35	140	DoC edit to the condition reference (condition 76 instead of condition 138) to reflect action wetland offset outcomes.	This cross-reference update is not agreed to on the basis the Applicant does not support the requested changes to the NGDP:WP.
36	143	DoC edit to reflect these were not modelled but are rather data inputs that the model evaluated for ecological equivalence with the corresponding measures of losses.	The Applicant disagrees with amending these conditions from ‘modelled targets’ to ‘progress targets’. While the Applicant acknowledges that the values in the listed Tables were derived from empirical data inputs assessed by the model, the term “modelled targets” is preferred as it more accurately reflects their role as outputs evaluated within the REAR-TE modelling framework to determine ecological equivalence. Using this term maintains consistency with the referenced report and clearly links monitoring to the modelled assessment of offset performance.
37	144		
38	145	DoC suggests amendments to improve clarity and enforceability in line with targets established above (condition 70A).	The Applicant disagrees with the amended wording as it does not provide any additional clarity and the current wording provides for a similar outcome.
39	147	DoC suggests amendments to improve clarity and enforceability and to reflect changes to conditions above.	The Applicant has accepted the changes in part which is reflected in the updated condition set.
40	148	DoC suggests amendments to improve clarity and enforceability and to reflect changes to conditions above.	The Applicant disagrees with amending these conditions from ‘modelled targets’ to ‘progress targets’ for the reasons provided in rows 36 and 37 above.
41	149	DoC suggests amendments to improve clarity and enforceability and to reflect changes to conditions above.	
42	150	DoC suggests amendments to improve clarify and enforceability.	The Applicant accepts requested changes which have been made in the updated condition set.
43	151	DoC suggests amendments to improve clarify and enforceability.	The Applicant disagrees with the amended wording. It is not considered to improve clarity or enforceability.



Response No.	Condition number	Comment summary	Applicant response
44	153	DoC suggests amendments to improve clarify and enforceability.	The Applicant accepts the recommended amendments which have been made in the updated condition set.
45	154	DoC suggests amendments to improve clarify and enforceability.	The Applicant accepts the recommended amendments in part which is reflected in the updated condition set.  Amending the condition to refer to 'progress targets' is not accepted for the reasons set out in rows 36 to 37 above.
Name of commentator: Auckland Council			
46	1	Auckland Council defers to the applicant team for any response regarding updated documents (including dates) referred to in the table within condition1.	The Applicant has reviewed the documents listed in condition 1, including their version and dates, and has made the necessary updates.
47	14	Auckland Council agree updating table 1 to include/describe a monitoring period for each monitoring plan will be useful. Auckland Council defers to the applicant team for any updates to Table 1	The Applicant has added in a new condition 18 ' <i>Duration and application of management and monitoring plans</i> '. At this stage, it is not possible to specify the duration of each management or monitoring plan, as the construction programme and staging are not yet confirmed. Given the nature of the Project, various management and monitoring plans will be required at different stages of the works, may not be needed for certain periods, and will then be reinstated as necessary.
48	17	Auckland Council agree updating table 1 to include/describe a monitoring period for each monitoring plan will be useful for both the applicant team/consent holder and council monitoring teams. Auckland Council defers to the applicant team for any updates to Table 1	
49	30A, 33	Auckland Council considers that condition 33 is intended to sit within the SDEP conditions (conditions 29-30) An equivalent condition should be created to sit within the StMP condition (i.e. as condition 30A) – or update existing wording of condition 33 to reference StMP rather than SDEP.	The Applicant disagrees with the suggested changes. The Applicant considers that the SDEP conditions are more designed-focused to ensure that the design of the stream diversion replicates the form and function of the natural stream downstream. The StMP is more focused on construction methods and management measures for managing water quality. This condition was intended to ensure that any construction method or timing set out in the SDEP was reflected in the StMP. The Applicant does not consider a similar condition is required in the SEDP conditions as this is a general requirement under conditions 17 and 19.  The Applicant spoke to Doug Fletcher, Auckland Council, on 4 December and Doug confirms he agrees in principle with the Applicant and that changes to these conditions are no longer required.
50	44(b)	Auckland Council request groundwater level monitoring within the Mangawheau Stream Catchment within the 7.5km radius of dewatering effects. ECL (2025a) – The Technical Memo, dated 19 September 2025; recommended MG1 shallow and MG1 deep monitoring bores at Sinclair Road adjacent to the Mangawheau Stream. WWLA has recommended an alternative location closer to the quarry. From ECL (2025b) <sup>1</sup> , the Sinclair Road position is still preferred as this location provides important groundwater-surface water monitoring information which cannot be achieved at the WWLA location.	Refer to the Applicant's response provided to the Panel on 27 November 2025, specifically the Applicant's comment on Condition 122. The Applicant does not oppose drilling a new bore in the proposed direction, provided that groundwater drawdown from dewatering is first detected in the currently unaffected monitoring bores east of the Hunua Fault (SG11L, SG12L, SG13, BH103, BH109, and BH104). While some of these bores (SG12L, SG11, and SG13) are located near the projected edge of Stage 5, expansion to that stage will occur over decades, allowing sufficient time to assess groundwater responses and determine if additional bore(s) are required, and in what location/direction.  Given the potential for preferential flow paths in the greywacke bedrock, specifying the location of a new bore now is premature. A more appropriate approach is to use ongoing monitoring data to confirm the direction of groundwater movement and inform the future siting of any additional bore. Should an extra bore be required in the Mangawheau catchment, preference should be given to using an existing deep greywacke farm well, where available.  The Applicant considers that Condition 122, as currently drafted, remains a robust and adaptive mechanism to require new monitoring bores in any direction not adequately covered by the current network, should monitoring results indicate declining groundwater levels.  PDP spoke to Jon Williamson on 4 December and Joh agrees in principle with Condition 122.
51	44(b)	Auckland Council requests the monitoring plan incorporates the Sinclair Road MG1 shallow and MG1 deep monitoring bore locations at associated map reference coordinates, as shown in Figure 1 and amended Appendix 1 attached to the ECL (2025a) Technical Memo.	Refer to response in row 50.
52	44(b)	Auckland Council requests that Appendix 1 – Schedule A Groundwater Monitoring Bores and Trigger Levels be attached to the conditions.	The Applicant agrees and has added Appendix 1 – Schedule A back into the condition set.
53	56	Auckland Council suggest changes to the formatting of sub-clauses of the Lizard Management Plan condition.	The formatting of the sub-clauses has been corrected in the updated condition set.
54	116	Auckland Council provides comments relating to blasting noting that he is not a blast of quarry expertise but instead based on experience from reviews of other blasting assessment reports. His comments point out the differences between production blasting and any other forms of blasting.	The Applicant seeks to retain the wording of the blasting condition as currently drafted.

<sup>1</sup> ECL (2025b). Drury Quarry Consenting, BUN60449474-FTAA-2503-1037. Peer Review of WWLA Hydrogeological Report Fast Track Sutton Block. Letter report ref L3690, dated 11 November 2025

Response No.	Condition number	Comment summary	Applicant response
55	154	Auckland Council notes that within 12 months of the monitoring is a long time to wait for a monitoring report. Auckland Council does not agree with the advice note - it is likely that new monitoring technology would be based on different assumptions and is unlikely to be a direct substitution for the current methodology. This will result in potentially skewed results in monitoring.	The Applicant has amended the timeframe for this reporting to be 6 months in the updated condition set.
56	174(d)(ii)	As the conditions relate to drawdown and trigger levels associated with drawdown, any changes need to be carefully considered. Auckland Council request that condition 174(d)(ii) should be rewritten to state "The Council approves a s127 variation for changes to trigger level(s) in Appendix 1. Any s127 application must be informed by the Consent Holders technical review required by 174(c) above".	<p>The proposed trigger levels for monitoring bores MK1L and MK1U cannot yet be defined, as these bores have not been drilled. Once installed, the trigger levels will be established based on measured baseline groundwater levels. The ability under condition 3(d)(ii) to amend the trigger levels does not alter the predicted groundwater drawdowns, nor does it change the consented activity. This mechanism enables refinement of the trigger levels as actual site data becomes available, ensuring that monitoring remains accurate and representative of existing conditions.</p> <p>Adjusting trigger levels in this manner reflects updated groundwater level information; it does not affect the scale or nature of the predicted drawdowns or generate new or greater adverse effects. Accordingly, this flexibility does not trigger any requirement for a Section 127 variation. Council has accepted a similar process under other groundwater permits for comparable quarry operations, and it is considered appropriate and robust to retain this approach here.</p> <p>The Applicant spoke to Doug Fletcher, Auckland Council, on 4 December and Doug confirms he agrees in principle with the Applicant.</p>
57	182	The condition requires a mitigation plan which will outline mitigation measures to ensure compliance with freshwater quality thresholds to be submitted to Council. As this plan will outline mitigation measures to ensure compliance with the freshwater thresholds, the conditions should be updated to confirm the monitoring plan needs to be certified by Council. Therefore, the freshwater mitigation measures plan required by condition 182 should also be included in the table of management plans that need to be certified (Table 1 located between conditions 14 and 15).	The Applicant agrees has made the suggested amendments in the updated condition set.
58	184	<p>From Figure 17A, the stream flow monitoring sites listed in condition 184 (a) to (f) are all new. A check of stream monitoring coordinates has been completed on PDP Figure 17A.</p> <p>The check Figure ECL 17A shows agreement with the coordinate positions for NT1-8, NT1-1 and Hingaia Tributary Downstream. However, the coordinates provided for Mangawheau Stream Upstream and Hingaia Tributary Upstream do not match the plotted monitoring positions shown in Figure 17A. The correct monitoring positions at these locations need to be clarified with the Applicant.</p> <p>Auckland Council notes "RL datum" could be defined for clarity as it is unclear whether it refers to 'sea level'. Auckland Council anticipates that station NT1-1 needs to be established prior to any works to establish flows required to maintain the existing consented offsets.</p>	<p>The position of the gauging stations shown in Figure 17A are correct. The Applicant has corrected the coordinates for the Mangawheau Stream Upstream and Hingaia Tributary Upstream. Figure 17A has been added as Appendix 2 to the Consent.</p> <p>As noted in the Applicant's comments issued to the Panel on 27 November 2025, the NT1-1 station is an existing monitoring site required under the current Drury Quarry groundwater permit. Its inclusion in this condition ensures the continued operation of the station and was added at the request of Auckland Council. Auckland Council is correct that the NT1-1 gauging site is located below RL 170 m, and monitoring at this site will therefore need to be continued upon the granting of consent.</p>
59	188	Auckland Council agrees with WWLA and suggest a replacement to Condition 188.	The Applicant proposed amendments to conditions 188-197 to be based on baseline Mean Annual Low Flow (MALF) in response to Minute 11 received on 25 November. Refer to updated condition set.
60	194	Auckland Council suggest the addition of an advice note defining the term 'specific discharge', as well as amendments to augmentation trigger for reduced specific discharge over three consecutive years to address Panel concerns.	Refer to the response at row 59. The Applicant has included the advice note defining the term 'specific discharge'.
61	196	The augmentation triggers, specifically Condition 194(b), require assessment with greater frequency than annually. Auckland Council suggest Condition 196 is revised.	Refer to response at row 59. All streams adjusted augmentation flow rates must be reported in the Augmentation Regime Management Plan in response to Panel Minutes 10 and 11.
62	197	<p>Auckland Council proposed amendments to Condition 197 to address Panel concerns regarding augmentation trigger for reduced specific discharge over three consecutive years.</p> <p>Auckland Council also notes that, from an ecological perspective, augmentation must occur at the first instance the activity could have an adverse effect on flows and continue until the activity can be demonstrated to have no effect on flows (possibly in perpetuity).</p>	Refer to row 59.
63	193(a)	Auckland Council suggest the addition of an advice note defining the term 'specific discharge' as outlined in response 17.	Advice note added to the updated condition set. Refer to response at row 60.
64	Appendix 1	Auckland Council notes that Appendix 1 needs to be revised to provide location and coordinates for ECL requested MG1 shallow and deep monitoring bores located on Sinclair Road. These are attached as Appendix 1 revision from ECL (2025a) Technical Memo.	Refer to the response to Minutes 10 and 11 and the conditions issued on November 27 and row 50.



Response No.	Condition number	Comment summary	Applicant response
Name of commentator: Auckland Council – additional Earthtech Response to Minute 11 dated 25 November 2025			
65	194(a) and 197	Three year wait on augmentation trigger in Mangawhaeu and Hingaia tributary streams. In terms of hydrology, it is considered that three years of gauging would be a minimum requirement to determine changes in stream base flow. ECL reviewer supports panel’s approach in requiring augmentation unless the Applicant demonstrates that losses are not associated with quarry dewatering.	Conditions have been updated to be based on MALF.
66	188-196	Augmentation rates for Mangawheau and Hingaia tributary streams. ECL reviewer recommends that the augmentation rates be primarily determined by the maintenance of mean annual low flows (MALF conditions) as defined by baseline stream flow gauging.	This has been reflected in the updated condition set
67	184	Requirement for a baseline survey to be carried out prior to quarrying below RL170m regional groundwater level.	Condition has been updated to require NT1-1 and NT1-8 to be established prior to any quarrying below RL170m regional groundwater level. All remaining stations (where not already established) must be established at least three years before the sump water level drops below RL90m.
Name of commentator: Heritage New Zealand Pouhere Taonga (HNZPT)			
68	1	HNZPT support the proposed condition as drafted, with the addition of specific reference to stopping works and parties to notify in the event that archaeological evidence is discovered.  This ensures all persons working on site understand what the process is if this is encountered during works.	The Applicant accepts all recommended amendments and this is reflected in the updated conditions.
69	6	HNZPT propose the following amendments: <ul style="list-style-type: none"><li>Ngāi Tai ki Tāmaki amended for correct spelling.</li><li>Mana whenua notification (before works) amended to five working days, to enable sufficient timing for mana whenua to coordinate with monitors or representatives to be onsite at start of works (if they wish).</li><li>Mana whenua notification (after works) amended be in working days, consistent with the pre-work notification condition.</li></ul>	
70	8	HNZPT propose an amendment to remove the requirement for hard copies to be provided as HNZPT no longer requires hard copies of final reports.	
Name of commentator: Auckland Conservation Board			
71		A 15-year timeframe has now been proposed for the wildlife approval, but a maximum 10-year timeframe is the recommended period for such approvals, given the enormous environmental and technological changes that may occur over that period.	Refer to Applicants response to comments dated 10 September. The Applicant requests a 15-year Wildlife Approval on the basis that this aligns with indicative Stages 1 and 2 and has proposed a review at the 10-year stage.  The Applicant notes that DoC has agreed to this approach.
72		There is still no mention in any of the documentation (Appendix A - Draft Resource Consent Conditions, Appendix B – Draft wildlife approvals and conditions, or Schedule 4 – Revised Lizard Management Plan) of the necessary inclusion of mouse control as part of pest control measures. There is only stated: “Control of pest predators including possums, rats and mustelids”. It appears that Appendix A and the Lizard Management Plan still require further revision to include this requirement.	Refer to the response in rows 1 and 2 above.
Name of commentator: Te Ākitai Waiohū			
73		Te Ākitai Waiohū Settlement Trust considers that the draft consent conditions do not differentiate between mana whenua iwi. Te Ākitai Waiohū believe they have a significant and specific relationship as compared to other mana whenua iwi and this should be reflected. Any reference can be viewed in our Te Tiriti o Waitangi Claims (Deed of Settlement).	The Applicant has consulted with all Mana Whenua with an interest in the site. This is a long-term project and the Applicant is committed to working with all Mana Whenua groups for the term of the consent. The Applicant is reluctant for the consent conditions to prefer one Mana Whenua group over another.  The Applicant looks forward to engaging with Mana Whenua in a manner that is in accordance with their tikanga.
Name of commentator: Tim MacWhinney			

Response No.	Condition number	Comment summary	Applicant response
74		My main objection to the Quarry expansion is that the proposed western boundary of the quarry workings and pit, will be too close to my properties [REDACTED] [REDACTED] [REDACTED]. The proximity of the proposed quarry will result increase in several adverse effects on his properties including noise, dust, amenity, groundwater and loss of indigenous bush. .	Thank you for your comments. Your concerns are acknowledged, and SAL will look to discuss these with you outside the FTAA process. The concerns raised in Tim MacWhinney comments are similar to the matters raised in his original submission received on 29 September. We refer you back to SAL response to that submission set out in Table 1.1: Land owners comment summary and applicant response, row 1 October 2025.