1 Expert Panel: s67 comments - Applicant's response to Minute 3, dated 8 September 2025, provided 22 September 2025)

Table 1.1: Expert Panel comment summary and applicant response

Response No.	Date	Name	Specialism	Comment summary	Applicant response
1	8/09/25	Expert Panel	**Noise Report**	[1] The 'Drury Quarry – Sutton Block Assessment of Noise Effects' report, prepared by Marshall Day Acoustics and dated 26 March 2025 (Noise Report) refers to the modelling undertaken reflecting that there will be circumstances where both the existing pit and the Sutton Block pit are operating simultaneously. It also refers to modelling having been undertaken for construction noise. It is assumed that these were separate modelling exercises, or did the SoundPLAN modelling assess both (e.g. cumulative noise from operational and construction activities)?	Yes, this assumption is correct – the modelling assessed operational and construction noise separately.
				[2] Based on the answer to the above, is there a need to include conditions that would prevent temporary construction activities from occurring at the same time as any other works (i.e. removal of overburden) within the Sutton Block? These would specifically be for receivers that may experience both, for example upper MacWhinney Dr and Sonja Dr.	The Applicant does not consider additional conditions are necessary. The construction noise limit is 15dB higher than the AUP zone limit. If two sounds more than 10dB apart are played at the same time, only the louder of the two is audible. Therefore, if construction and quarrying occurred at the same time, both complying with their respective limits, only construction noise would be audible.
				[3] The construction noise limits recommended in the Noise Report match the AUP:OP (see Table 4 page 10). However, there was an assumption within the Noise Report that construction would not occur in the weekend or on public holidays, whereas the AUP rules include controls for those times. Is there a need to include these matters as conditions in the consents (i.e. the weekday controls in Table E25.6.27.1 apply, and there shall be no construction works in the weekend or on public holidays (excepting perhaps addressing emergencies))?	The Applicant acknowledges that the Noise Report included an assumption that construction would not occur in the weekends or on public holidays. This assumption was incorrect. Construction Works may occur during these times; however, all works will comply with the applicable AUP construction noise limits. This incorrect assumption does not alter the conclusions of the Marshall Day report, which continues to consider that the construction works are appropriate and will remain within the AUP limits. Further, the draft conditions include a definition for 'Construction Works' - refer to **Attachment A**. To provide better alignment, the Applicant proposes to amend: • Condition 18 to refer to Construction Works; and • the CNVMP (Condition 19) to refer to the applicable AUP rules.
				[4] Are there anticipated to be any rehabilitation works for the existing pit that would create noise at such a level that it ought to be modelled or otherwise addressed?	There are no proposed or known rehabilitation works for the existing Drury Quarry pit. As the Drury Quarry pit is expected to provide approximately 20 more years of aggregate supply, no closure or rehabilitation plan has been developed at this stage. Any future closure activities will be required to comply with the relevant plan in place at that time or obtain separate consent/s.
				[5] Please provide a copy of the plan referred to in condition E2 (pit edge terrain screening for properties to the north-west)?	Figure 16 'Pit Edge (terrain screening) to be Maintained' is provided in Volume 1, Appendix D of the Assessment of Effects on the Environment (AEE). We have provided a copy as **Attachment B**.
				[6] The (temporary) northern bund does not appear to be specifically mentioned in the conditions, though it does appear on the landscaping plans. Please provide a specific draft condition for this.	The consent conditions define Construction Works as including the construction of all bunds, including the (temporary) northern bund. Condition 18 (CNVMP) has been amended to specifically reference Construction Works. Refer to **Attachment A**.
				[7] The Noise Report refers to an agreement that night-time activities in the Sutton Block would be limited to the base of the pit only (section 6.3, page 13). This does not appear to flowthrough to the draft conditions, nor into any management plan. How is this proposed to be provided for?	In accordance with Conditions 85- 86, all operational quarrying activities emitting noise must comply with the AUP E25.6.3 and H28.6.2.1 standards. In practice, and as occurs on the existing Drury Quarry pit, SAL will work with its onsite noise experts to comply with these noise requirements. On that basis, a condition restricting works to the base of the Sutton Block pit is not required.
				[8] Given the existing nature of the dwellings listed in the second bullet point on page 15 of the Noise Report (upper MacWhinney Dr), and that parts of two of those properties may receive even higher noise levels, what consideration, if any, has been given to acoustic mitigation measures / improvements for those properties?	Marshall Day has assessed that effects on these dwellings will be reasonable, given the long project timescales and the fact that upper noise limits comply with AUP permitted standards. Therefore, for these reason, no acoustic mitigation measures are proposed.

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				[9] The Noise Report refers to the importance of the long-term noise monitors and how they could assist, in conjunction with the noise model, to keep a digital twin of quarrying operations up to date, and to consolidate the accuracy of future predictions. Their use for ground-truthing modelling and confirming the possibility of future compliance, seems important. Condition H4 refers to the two noise monitoring locations recommended in the Noise Report, but the data from those locations is only proposed to be used to demonstrate noise level compliance. Could a specific draft condition please be proposed for this (or condition C24 be amended)?	Note: Condition H4 is now Conditions 87-89. We have amended Conditions 88-89 to expand monitoring requirements.
				[10] Alternatively, it could be addressed by the Quarry Management Plan (QMP). The QMP conditions could contain more 'without limitation' specifics around what is to be included in the QMP, including in relation to the wider use of data from noise monitoring. Another option would be to update the draft QMP (28 March 2025, Stevensons) with this requirement and relevant details, and condition C24 could be amended to require that the final QMP be in general accordance with that draft QMP.	See response to Item 9 above. Conditions 88-89 have been amended to expand monitoring requirements. Condition 65 – 66 (QMP) require the QMP to set out practices and procedures for operational noise management and monitoring. The draft QMP has been updated accordingly to reflect the revised noise monitoring requirements (refer to **Attachment C**).
				[11] Please provide a copy of Appendices D and E to the Noise Report with a column for the equivalent / indicative existing ambient noise level (actual measured if available, or modelled assumption).	We are adding an existing noise levels column to the results tables in Appendices D and E of the Noise report. This will not be ready by Monday 22 September, but will be provided as soon as possible.
				[12] The complaints procedure outlined in the draft QMP (page 8) is reasonably brief, and condition C24 is similarly so. Please provide an updated QMP, or proposed amendments to draft condition C24. They do not for example: a. Provide details on how publication of contact numbers is to be achieved so that neighbouring owners and occupiers can find the contact number (for example on social media, local papers, company website(s), and on-site signage). Appreciating that available pathways can change over time, it would be useful to describe current proposals while allowing for future change. b. Outline a Communication Plan, as recommended in the Noise Report (page 16, last bullet point), regarding how neighbours (and relevant others) would be informed of the activities and timing associated with the Sutton Block development. SAL may wish to have a broader comms plan, but for resource management purposes we would like to see some advance warning of pending changes relating to construction and operational noise effects.	The draft QMP (Conditions 65-66) has been updated to include a new Section 5, which sets out the key engagement methods currently undertaken by SAL with a range of stakeholders, including adjoining landowners. This includes reference to project website dedicated to responding to enquires from the public. In addition, Section 6.1 of the draft QMP has been amended to strengthen the complaints procedure and reporting requirements. The QMP condition has also been revised to cross reference the standalone Complaints and Complaints Register in Condition 8, ensuring these processes are explicitly embedded within the QMP.
				[13] Reading the Noise Report we did not get the clear sense that consideration had been given to the period of time over which some receivers are going to experience increased, possibly persistently increased (existing ambient), noise levels across the various stages of the pit life. Looking for example at the properties in the middle of Appendix D, Table D1 on page 21, there are a number that are anticipated to potentially experience 49-50+ from Year 3 all the way across to LoQ. Are there any further or additional comments that could be provided?	As outlined in our response to Item 11, we will provide updated Appendices D and E to the Noise Report, including an existing ambient noise level column, as soon as possible. Data collation is underway. In the meantime, we note that predicted noise levels for all stages will comply with the permitted AUP standards. Further, we note that all of the MacWhinney Drive and Peach Hill Road properties listed on Table D1 of Appendix D are all located within the AUP Quarry Buffer Area Overlay. Also, for the properties identified in Appendix D, Table D1 and denoted with an *, the predicated noise levels are largely uninfluenced by the Sutton Block works.
			Blasting Report	[14] The report entitled Blast Vibration and Noise Study, prepared by Orica and dated 13 December 2023 (Blasting Report) refers to blasting currently occurring once or twice a week, and that there had been 75 blasts year to date at the time the report was written. Currently, the closest houses are 400m to 1000m away, but for the Sutton Block houses are 130m to 300m away. How many blasts are there per day on average when blasting is undertaken, and what is the range (i.e. min to max number of blasts), looking at the last two to three years of data?	Blasting will occur 1–3 times per blast day, with blast days averaging 1-2 times per week. A typical blast day involves one production blast, and if required, a development blast. Where multiple blasts are necessary, the second and third blasts will be fired within seconds of the first. The table below provides an update on the number of blasts and blast days at the existing Drury Quarry for context. <table><tr><th></th><th>Blasts</th><th>Blast Days</th></tr><tr><td>2023</td><td>81</td><td>70</td></tr><tr><td>2024</td><td>69</td><td>58</td></tr><tr><td>2025 Jan - Sep</td><td>48</td><td>39</td></tr></table>
				[15] The Geotechnical Assessment from Riley refers to much of the excavation for the new pit needing to be done with blasting (see for example pages v, 47 and 48). Is the assumption of blasting being undertaken one to two times per week still accurate?	When developing the new pit, blasting will be intermittent, with blasting only in hard rock that can't be excavated or ripped by bulldozers. Blasting 1-2 times per week in Sutton block is still

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					accurate. Where possible, blasts in the existing Drury pit will be scheduled on the same day for efficiency.
				[16] What level, if any, of blasting is anticipated to be needed prior to 'production blasting'? What would this entail? Page 30 of the Blasting Report refers to blasting in the Sutton Block only commencing "once the pit has been excavated down to a bedrock of such strength that efficient excavation becomes challenging", and the importance of pit depth of mitigating noise is well understood by the Panel.	Blasting requirements are determined by the rock mass. Drill logs in the Riley Geotechnical Assessment indicate Greywacke starting around 30+ meters below the existing ground surface. Some basalt is also present at varying depths. The occurrence of blasting above this depth is uncertain, as rock bedding varies between drill logs. We estimate anywhere from 5 – 12 blasts may be required, depending on the size of the area being opened. These would typically involve short holes and low volume of explosives to reach the desired RL and establish a flat drill bench, after which production blasting would commence. Development blasts are always carried out conservatively, with a range of vibration controls applied to all blasts to mitigate vibration effects.
				[17] The second sentence of the second paragraph of the Summary, page 7 of the Blasting Report, refers to there being no "need for such a study to be completed". Some text appears to be missing here as there is no adjacent prior reference to a study. What is the study that is not considered to be needed?	This paragraph is saying no blasting vibration and noise assessment, like that completed for the Sutton Block, has been required for the existing Drury Quarry. Historically, vibration estimates have relied on theoretical calculations. This approach has proven adequate given the large separation distance to nearby houses and the very low vibration levels — well within the applicable blasting standards limits. As outlined in the Blasting Report Summary, this study has now established a site law for future blasting at Drury Quarry andseed waveforms were captured, to enable accurate blast vibration modelling in SHOTPlus™ 6, based on distance and explosive charge weights.
				[18] Please provide a copy of Section J from AS2187.2-2006. Are figures 10, 11 and 12 all taken from that standard? The tables themselves should be included in the draft consent conditions.	A copy of Section J from AS2187.2-2006 is attached as **Attachment D**. Yes, figures 10-12 are taken from that standard. The AS2187.2-2006 sets out how the monitoring stations are to be established. This standard is referred to in Conditions 93 and 98. We have referred to this standard in the Blasting Management Plan condition (Condition 33) and do not think the tables themselves need to be included in the draft consent conditions. Condition 92 has been updated to require all vibration and noise to comply with German Standard DIN 4150-3 1999: referred to in the AUP, as requested by Auckland Council.
				[19] The Panel is particularly keen to understand how Section J of AS2187.2-2006 might provide controls that would give appropriate protection to the physical attributes of the Karearea Pa site (particularly the stoneworks – stone alignments and heaps, facing remnants, stone rows and low walls, rectangular terraces, etc). Aside from the buffer area provided to that site, no specific blasting/vibration draft conditions appear to yet be in place: a. Has the project archaeologist been asked for advice in relation to the possibility of vibration / air blast effects on the stoneworks present at the Pa site arising from blasting? It does not seem to be referred to in the Clough & Associates Report. b. Should this site be monitored specifically (pages 10 and 27-30 of the Blasting Report suggest it should be)? If so, where? What controls or mitigations could or should be put in place should a physical adverse effect be identified? c. What vibration / air blast controls would be appropriate given the site does not contain physical (modern) buildings but holds significant cultural importance and does contain valuable archaeology? Would 5mm/s be appropriate (page 29)? More detail is needed on this in the conditions. d. Is there sufficient information available about the Pa site, for example site photographs and measurements etc, that would enable assessment of whether or not damage had occurred (for example, information of a standard that would enable pre and post blasting assessments to be made, as would be done in the case of construction works near heritage buildings)? Or are there cultural concerns that would make this information difficult or inappropriate to obtain?	There is currently no recognised or agreed numerical standard that is considered appropriate for managing potential vibration effects on stone structures of archaeological or cultural significance. The Kaarearea Paa is a highly tapu site, which means that actively entering the site or establishing monitoring equipment is not straight forward. During mana whenua engagement over the last several years, Mana Whenua have been offered the opportunity to walk the paa but have not yet taken up that offer. Proposed Condition 7(f) (Cultural Values) provides for the ongoing opportunity for Mana Whenua to access Kaarearea Paa, subject to health and safety requirements. The NZAA site record (R12/278 Kaarearea Paa, Te Maketu – burials, stonework, earthworks) and full inspections undertaken in 1989 and 2002 identify that substantial modifications and damage had already occurred to the paa features as a result of historic farming practices, earthworks, and fossicking, before SAL fenced the paa and carried out enhancement planting. It is also relevant that the paa directly adjoins the existing Drury Quarry, which has operated for more than 80 years. The information provided in the Blasting Report represents the extent of vibration monitoring at the paa site obtained to date, and no additional monitoring results are available beyond what was submitted with that report. It is proposed that a Blast Management Plan (Conditions 32 and 33) be prepared and will be referenced in the conditions. This plan will set out how blasting will take place at the site and will be able to specifically include any relevant considerations that may be required in proximity to the paa site to manage effects. This will be a matter that will be the subject of ongoing consultation with mana whenua.

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				e. Page 28 of the Blasting Report (prepared in December 2023) referred to monitoring continuing at the Pa site for a further three months to gather more data. What updates are available?	
				[20] Draft conditions H5 and E5 don't appear to cross-reference well, or to accurately / clearly describe the processes of modelling, vibration monitoring, data management, and calibration (both in relation to modelling v monitored, and in relation to the seed holes). As distance is less able to be relied on, the need for well managed blast planning, loading, calibration and review practices will increase. The Panel is keen to ensure that current 'best-practice' is continued, and described better within the draft conditions. Can more detail please be provided in the draft conditions on: a. How many seed holes will be required, for example at what grid pattern, or in what locations, or is there a process that could be described for how these might be determined (i.e. by a SQEP)? b. What initial seed holes should be completed, along with smaller trial blasts, to calibrate the vibration model to best determine blast design constraints (and ensure compliance) (page 30 Blasting Report)? c. How will the model be calibrated and updated over time, and how will the need for additional seed holes be addressed (for example, as the pit deepens, as different rock types are uncovered, and / or to update the model for changes during wetter months)? d. The cross-reference in E5 seems to need to be to condition H5(e)? e. In the last sentence of E5 the Panel assumes that the vibration estimates are not what is used to calibrate the model, but rather a comparison of the estimate the model produced against the actual monitoring result. f. Condition H5(e) could similarly benefit from more detail. We understand that Orica and the current SAL team may know what is needed from the many years of operation of the monitors and model, but it is important that the conditions make sense to unfamiliar and future readers as well. g. Is one blast monitoring station enough (condition H5(a))? The Blasting Report refers to blast vibration and air overpressure monitoring being regularly carried out at 3-4 houses surrounding the existing quarry. As the Sutton Block is closer to dwellings than the existing pit a reduction in numbers (if that is what is proposed) seems inappropriate? h. Requirements for periodic review of blast vibration mitigation (e.g. the list on page 37) and air blast mitigation (e.g. the list on page 38) should be included in the conditions.	We have fixed cross-referencing errors between consent conditions and have proposed that a Blasting Management Plan be prepared (refer to Conditions 32 and 33). In response to your specific questions: a. For new areas where no previous blasting has been occurred, 6-12 seed holes with 6 different monitoring points would provide a lot of data. These holes will be positioned in the area where blasting commences, with variations in distance and explosive charge mass to generate a robust dataset. This not necessarily a grid or particular pattern. The seed holes will be GPS located and incorporated into blast vibration software to produce an initial predictive model. Following each blast, recorded vibration levels will be fed back into the software, allowing the predictive model to be calibrated and refined. This iterative process ensures that blast design parameters can be progressively optimised to stay within consented limits and minimise offsite effects. This process is required and given effect under proposed Conditions 95–97. b. Refer to response to a. above. Further, initial seed holes and smaller trial blasts should be undertaken starting from the furthest point away from the nearest sensitive receiver. The appropriate charge mass will be determined using the theoretical scaled distance calculation to ensure vibration effects remain within predicted and compliant levels. This is reflected in proposed Conditions 95 – 97 and the Blast Management Plan. c. The blast vibration model will be calibrated using initial seed holes and trial blasts, with the results compared against theoretical predictions. As blasting progresses, actual monitoring data will be continuously fed back into the model to refine and improve its accuracy. The model will also be updated over time to account for changes in pit depth, variations in geology (such as encountering different rock types), and seasonal conditions like wetter ground. If monitoring results indicate that additional seed holes are required to confirm predictions under these changing conditions, they will be undertaken. Refer to Conditions 95 – 97 and the Blast Management Plan. d. Cross-referencing error corrected. e. Correct, vibration waveform is input into the software and then compared against theoretical predictions. f. Refer to proposed Blast Management Plan conditions (Conditions 32 and 33). g. We have amended Condition 98(a). h. These have been incorporated into the Blast Management Plan condition.
				[21] The above is important because the QMP is only required to include "operational vibration management and monitoring" (condition C24)? Is this wide enough when the Blasting Report considers that compliant blasting is "very realistic", but does not go further? The QMP should in the Panel's view be required to provide the details needed to comply with draft conditions E5 and H5. As noted above, an alternative may be to update the draft QMP (so that it lists the relevant steps or considerations), with condition C24 then requiring general accordance with that draft.	Refer to the revised updated QMP condition. The QMP Condition 65 requires the QMP to set out the practices and procedures to be adopted at the Site to ensure compliance with key operational requirements. The matters that must be addressed in the QMP have been expanded. Further, section 4.5 of the draft QMP requires that blast vibration and noise generated from the quarry must not exceed the limits set out in the German Standard DIN 4150-3 1999 (or any amendment thereafter).
				[22] Is it intended that the CNVMP (condition C4) applies only to the construction of the haul road and northern bund?	Yes. See the Construction Works definition.
				[23] "Increase stemming" is referred to as one mechanism to help contain blasts. What does this involve, and should there be a reference to it in the relevant management plan conditions?	Stemming refers to the placement of inert aggregate material (such as crushed rock or aggregate chips) into a blast hole above the explosives to help contain the blast energy. Increasing the amount of stemming reduces the quantity of explosive product per cubic metre (lowering the powder factor) and assists in controlling both ground vibration and airblast effects.

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					The use of stemming is a standard practice applied to all blast holes as part of routine operations, and it is one of several mechanisms available to manage blast effects. The proposed Blast Management Plan conditions (Conditions 32 and 33) requires that mitigation and management measures are documented and implemented. A separate condition specifically referencing stemming is not considered necessary.
				[24] The Air Report refers to blasting being currently completed between the hours of 9am-5pm Monday to Friday (page 16). Is a draft condition of consent to this effect appropriate? Would there be circumstances where blasting was needed unexpectedly, such that it couldn't have been planned for in the preceding working-day week?	This is an error in the Air Report. Blasting is proposed between 9am – 5pm Monday to Saturday, and a condition (new Condition 94) is proposed. This is in accordance with the AUP standards. Blasting is a carefully planned, designed, and controlled process that requires sufficient preparation time. It is limited to daylight hours and scheduled to ensure activities remain fair and reasonable for neighbouring communities.
				[25] Page 46 of the Blasting Report appears to contain an extract of outdated AUP:OP provisions relating to noise and vibration under Chapter H28, whereas pages 23-24 appear to set out the current provisions. Has the Report included the provisions set out at page 46 for any particular reason or are these provisions not relevant to the assessment and conclusions being reached?	These standards are not relevant. The updated provisions have been used to inform the conclusions reached. Further, the proposed consent conditions have also been amended to refer to AUP's current provisions.
			Air Report	[26] The Sutton Block – Air Quality Assessment prepared by Pattle Delamore Partners Limited and dated March 2025 (**Air Report**) refers to the existing earthworks consents which apply to "the majority of the proposed Sutton Block pit". Is it possible to provide a plan which shows the areas that are not covered by the existing consents?	Refer to Figure 12 'Approximate Extent of Key Existing Consents' which is provided in Volume 1, Appendix D 'of the AEE. The approximate extent of the wider earthwork consents (R/LUC/2015/2419 and R/REG/2015/2420) are shown with purple hatching. Any area within the wider SAL Landholdings (shown in yellow) that is not covered by the purple hatching, is not subject to the earthwork consents. We have provided a copy as **Attachment E**.
				[27] Has any ground-truthing been done, or is any proposed to be done, for the CALMET-derived wind rose for the Sutton Block?	Section 2.2 Meteorology of the Air Quality Report (PDP, 16/12/2024) contained a detailed comparison of the CALMET synthesised wind profile for the Sutton Block area against the wind profile recorded by the nearby Drury Quarry Automated Weather Station (AWS) to ground-truth the meteorology. This comparison indicated that the Drury Quarry AWS was likely to be shielded to a degree so that its wind readings were lower and more varied than those likely to be experienced at the higher elevation Sutton Block. Across Auckland, south-westerly winds are predominant, with north-easterlies secondary (refer: NIWA: https://webstatic.niwa.co.nz/static/Auckland%20ClimateWEB.pdf). Between March and June 2025, PDP undertook a period of on-site wind monitoring at the Sutton Block utilising a 10 m high mast. This on-site monitoring indicated agreement with the CALMET dataset's predictions of higher wind speeds at the Sutton Block, and a predominance of southerly and northerly wind directions. Winds from the south-east and east (i.e. toward the nearest sensitive receptors) were relatively infrequent over the three-month monitoring period.
				[28] For crushing within the Sutton Block pit, does rule E.14.6.2.2 refer only to existing dwellings, or might it also capture new dwellings? Even if those new dwellings need to establish in accordance with the rules that apply by virtue of the buffer zone, might there be a need to periodically check whether there are any houses within the 200m control?	Currently, there are no existing dwellings within 200 m of proposed crushing activities (refer to Condition 124). However, if the landowner of 369 Macwhinney Drive were to obtain a Controlled Activity consent under Rule D27.4.1 (A1) to establish a dwelling within 200 m of crushing activities in the Quarry Buffer Area Overlay, and such a dwelling were constructed, Stevenson's would push out crushing within the upper north-western corner to maintain the required 200 m setback.
				[29] What is "rule A91", in relation to activities in the rural zone requiring consent (page 10) a reference to?	Rule E14.4.1 (A91) Mineral extraction activities at a rate exceeding 200 tonnes/ hour from any one quarrying process within the Medium air quality - dust and odour rural area (Rural) is listed as a reason for consent in Table 8.2 'Resource consents required under the AUP' of the AEE. As approximately 30 ha (28%) of the LOQ footprint is located within the Rural Zoning, consent is sought for air discharge activities a discretionary activity under Rule A91.
				[30] Draft condition C8(e), and possibly also F7, should be updated to include the mitigation measures (as options etc) outlined in sections 5.1.3; 5.2.2.1; 5.3.2; 5.4.2.1.1; and 5.4.2.2.1; the monitoring set out	Condition 26 and 27 set out the requirement for a Dust Management Plan (DMP) and broadly set out the matters that are required to be covered in the plan. Further detail as requested by the Panel, is contained with the DMP, including potential mitigation measures, monitoring

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				in Table 4 (page 25); and the triggers in 5.5.2. If these are in the existing DMP for the current pit, a cross reference to that plan may be acceptable (please provide a copy of the DMP if that is proposed).	procedures, monitoring locations and triggers. We consider the DMP is the most appropriate place for this detail to be contained rather than in the condition set. This is because it allows the consent holder to make changes over time to respond to new information or new techniques to manage effects. We have attached the DMP for reference as **Attachment F**.
				[31] Section 6.2.5 of the Air Report includes a recommendation that a dust monitor be installed on the site boundary where works are within 140m of a dwelling. This does not seem to flow through to the draft conditions. Please provide an updated draft condition.	We note that there is a specific property that is identified in the Air Report that will be within 140m from the works area as the pit extends over time. However, we note, that no crushing activities will occur within 200 m of this dwelling as required under Condition 124. Further, this specific location will be identified as a monitoring location in the DMP. Condition 27 requires the DMP to identify the specific monitoring locations and this location will be included in this list as specified in the updated Condition 129.
				[32] Given the potential for health effects from RCS (albeit assessed as being very low), would it be appropriate to include some post-establishment monitoring and reporting to confirm whether the assumptions made in section 6.4.2 were appropriate? If so, please provide appropriate draft conditions.	Post-establishment monitoring and reporting for respirable crystalline silica (RCS) is not considered necessary given the low level of risk. Specifically, section 6.4.2 of the Air Report concludes that the potential for off-site RCS effects will be very low. Additionally, as most robust RCS monitoring methods use a discrete lab-analysed sample, it is generally conducted as a one-off exercise due to the cost. RCS also represents only a small proportion of total dust emissions. The current consent conditions, which require continuous instrumental dust monitoring, are considered sufficient to manage dust levels overall, including RCS.
				[33] The extensive network of dust monitors proposed around the Sutton Block is relied on within the conclusion of the Air Report, but they are not directly required through conditions of consent. Rather, they appear to be required through the DMP. To address this, please provide a draft condition, or a copy of the DMP. One possibility may for example be to require that the Sutton Block DMP adopt sections of the existing DMP, so that mitigation, monitoring and triggers etc are all 'brought across' for the new pit.	Condition 128 sets out the requirements to provide dust monitors and for these to be identified and listed in the DMP. This includes a specific reference to a dust monitor at the boundary with 359 MacWhinney Drive. The DMP has been included with this response (**Attachment F**) and includes the suggested locations of the monitors. By leaving the detail to the DMP, it gives the consent holder the ability to add or move dust monitors to respond to real time information without triggering the requirement to make changes to the consent conditions.
				[34] In section 6.4.2, is the "form of effect" referred to here the potential to contract silicosis (mentioned at the very end of the conclusion), or something else?	Yes, the "form of effect" assessed in section 6.4.2 is the potential adverse effects of RCS exposure on human health, and specifically silicosis.
			Geotechnical Assessment	[35] Please provide a better quality version of Figure 4, page 10 of the Geotechnical Assessment Sutton Block Extension Drury Quarry, prepared by Riley and dated 14 January 2025 (Geotechnical Assessment).	Figure 4 'Geologic plan' and corresponding cross-section maps are provided in Appendix H of the Geotechnical Assessment (Volume 1, Technical Report Q of the AEE). We have provided a copy as **Attachment G**.
				[36] Instability concerns with the Waikato Coal Measures (WCM) are recorded in the Geotechnical Assessment, along with a recommendation that "trial batters within the WCM and volcanic slopes be undertaken and the findings incorporated into the final design" (pages iv, 21, 28, 41, 48). The Assessment recommends a process for this (for example, cutting faces at varying orientations and adoption of an 'observational-type' method in which the performance of the batters is assessed during trials while production extraction occurs elsewhere (see section 14.3.11)). An adaptive strategy seems to be needed. Draft condition C10 (Slope Stability Management Plan) does not contain this detail however, referring only to annual review and trial batters in the WCM. Please provide more detailed conditions to address this.	Refer to revised Condition 31 (Slope Stability Management Plan). The SSMP requirements have been amended to give effect to the recommendations contained in the Geotechnical Report, including provision for trial batters, ongoing inspections and review, and incorporation of findings into pit design. It is considered that the revised condition sufficiently gives effect to the adaptive, observational strategy recommended in the Geotechnical Assessment. The condition achieves this through a structured management plan mechanism that is subject to regular review by a geotechnical professional familiar with the SSMP and any updates to the parameters and design provided by the ongoing review process. On this basis, the SSMP condition is considered appropriate and sufficient, and no separate or additional adaptive management condition is required.
				[37] The Geotechnical Assessment also refers to the importance of monitoring, and that "measurement, collation and analysis of defects, and their potential impacts of excavation and batter stability will continue as the quarry extension is developed." This also does not clearly flow through into the draft conditions. Please provide updated conditions.	Refer to revised Condition 31, specifically 31(a)(ii), attached as **Attachment A**.
				[38] The Assessment also refers to the need for trials of suitable blasting methods to minimise structural damage to the final batter profiles (prior to the formation of those batters), and to the final	Refer to revised Condition 31, specifically 31(a)(i) and (iii), attached as **Attachment A**.

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				face being subject to inspection by a geotechnical professional. These do not seem to be reflected in the draft conditions, please provide draft conditions for this.	
				[39] The Assessment recommends proposed alterations to the pit design to minimise slope stability risks (section 14.3.10). These do not appear to be referenced in or adopted by the conditions. Would it be appropriate to include reference to these in the conditions, for example under the SSMP, so that they are periodically considered and reported on?	Condition 31(a)(i) is intended to reflect the Geotechnical Assessment's recommendation regarding alterations to pit design to minimise slope stability risks. This condition requires review of trial batters in the Waikato Coal Measures and volcanic materials, with findings to be incorporated into the pit design. It is not considered necessary or appropriate to set a specific average or maximum slope angle at this stage, as this would risk constraining the design prematurely. Instead, the approach of assessing trial batters during quarry development allows geotechnical slope design parameters to be evaluated based on observed performance and geotechnical data, rather than set assumptions. This ensures that the final slope design is informed by site-specific evidence and can be optimised within the quarry limits as construction progresses.
				[40] Please check and confirm that all of the recommendations within section 17.0 of the Geotechnical Assessment are reflected in the draft conditions, or provide an explanation as to how they are alternatively addressed (for example, they may already be covered in management plans, in which case reference could be made to those plans).	Condition 31 (Slope Stability Management Plan) has been amended to incorporate the additional recommendations in Section 17.0 of the Geotechnical report. This condition now addresses all key recommendations from the report.
			Archaeological	[41] The Archaeological Assessment (Drury Quarry Extension, Sutton project, Drury, Auckland, Clough & Associates Limited, March 2025) recommends (page 47) that recorded sites R12/278 and R12/723 be taken into account and clearly identified in the detailed quarry development plans, and draft condition B8 reflects that recommendation. The sites do not however appear on the staging plans included in the draft QMP, but presumably could easily be. Would an amendment to draft condition C24 be appropriate, or could an amended/updated plan be added to the draft QMP and condition C24 be amended to require that the final QMP be in general accordance with that draft?	The Staging Plans provided in Appendix B of the QMP have been amended to show the indicative location of the recorded NZAA Archsites. Refer to **Attachment C**.
				[42] Noting the overlap with the Archaeological Authority applied for, is a consent condition requiring monitoring of earthworks by an archaeologist considered necessary (see bullet point 5 of the recommendations, page 47)?	Yes, it is considered appropriate that this condition remains. The Archaeological Authority only applies to Stage 1 works. In contrast, the resource consent condition relates to all stages of the project. Any earthworks within 10 m of the fenced off area must be monitored by an appropriately qualified archaeologist.
			Integrated Traffic Assessment	[43] What, if anything, limits the number of traffic movements into and out of the existing quarry and FOH? There don't appear to be any conditions in the existing FOH consent, nor in the existing air discharge permit (it is understood that the concrete plant consent limits truck movements generated there to 110 per day). Is it purely internal capacity constraints and processing factors within the quarry (and existing FOH)?	There are no current conditions in the existing land use consent for the Drury Quarry or the Front of House (FOH) consent that impose a numeric cap on daily vehicle movements. Similarly, the associated Air Discharge Permit does not control traffic volumes. The effective limitations on truck movements are instead governed primarily by internal operational constraints within the quarry and FOH. These include: • **Extraction and processing capacity** – the rate at which raw material can be safely extracted, crushed, screened, and stockpiled. Each processing facility has a specific throughput capacity, which defines the maximum quantity of material it can handle and process in a given period. This capacity is determined by the size and efficiency of the equipment. No changes are proposed to the processing facilities as part of this consent; • **Loading logistics** – the availability and sequencing of front-end loaders and weighbridge processes; • **Yard management and circulation** – the physical layout and capacity of the FOH area to safely accommodate queuing and manoeuvring; • **Market demand** – which can vary significantly depending on regional construction activity and seasonality. As such, the current level of truck activity (typically 600–700 truck movements per day (tmpd), up to 800 on busy days) reflects a balance between demand and these internal operational constraints. There is no history of overloading the FOH or causing adverse network effects due to unconstrained truck volumes.

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				[44] The Integrated Traffic Assessment (Don McKenzie Consulting Limited, dated March 2025) (ITA) refers to there being, generally, a total of up to 800 truck movements on a busy day, with typically 600-700 on an average day. A potential increase to 1,200-1,400 truck movements is then noted (page 13), with later references to "at least 2,000 tmpd" (6.1, page 21) and "up to an additional 8,000 tmpd" (6.2, page 21). Is there a natural maximum that ought to be applied, which would not unduly restrict the ability of the quarry to meet peaks in demand (for example, to meet the needs of major infrastructure projects, etc)? The Panel notes its understanding that key effects on the environment are managed through other conditions, and that the network has been developed with significant capacity.	The ITA presents a range of traffic volumes to reflect different future scenarios: • **600–700 (tmpd)**: represents current typical volumes; • **1,200–1,400 tmpd**: an anticipated increase as market demand grows; • **At least 2,000 tmpd**: a conservative planning maximum tested in the SIDRA modelling for capacity analysis; • **Up to an additional 8,000 tmpd**: a theoretical maximum referenced in the context of the Drury South Industrial Precinct full development scenario, encompassing all potential land uses, not just the quarry. For the Sutton Block specifically, there is no defined natural cap on traffic movements imposed by consent, but the upper end of approximately 2,000 one-way truck movements per day (equivalent to ~1,000 truck round trips) has been used as a potential high estimate for assessing network performance and intersection capacity in the ITA Appendix. This figure is considered to be a practical upper bound, based on: • The physical throughput capacity of the quarry and FOH; • The ability to manage internal safety and circulation; • The demonstrated capacity of the local road network and signalised intersections (as shown in SIDRA results); and • The need to retain operational flexibility to meet large-scale infrastructure contracts when required. We concur with the understanding that key environmental effects are managed through other conditions (e.g., noise, dust, hours of operation), and note that the surrounding road network was intentionally designed and constructed to account for the Drury Quarry operations, with sufficient capacity to accommodate significant truck volumes.
				[45] The Appendix to the ITA does not make it immediately clear what maximum tmpd/tmph has been applied because, other than a brief concluding paragraph on page xi of the Appendix, it (understandably) references instead capacity, volumes, degree of saturation and intersection delay. Could the Panel be provided with some assurance that consideration has been given to the ability of the network to perform appropriately at the higher maximums stated?	The SIDRA analysis presented in the Appendix to the March 2025 ITA tests intersection performance under a future traffic scenario that incorporates a 50% uplift in volumes compared to the PC46 2019 Beca modelling. This includes the effects of: • Increased HCV volumes from customer demand; • Ongoing industrial land development within the Drury South Precinct; • Projected growth on the surrounding arterial network. The concluding paragraph on page xi of the Appendix confirms that peak hour network loading from the expanded quarry operation was assessed using conservatively high inputs, and that all tested intersections—including those at Bill Stevenson Drive / Maketu Road and Toiawaka Road—were shown to operate within acceptable thresholds. These metrics provide assurance that the road network can accommodate the upper-end daily truck volumes discussed in the ITA, even during peak periods.
			General	[46] Do the current wind/met, noise and blast / vibration monitoring sites work for the new Sutton Block, or will they need to move? Will there be a need to have sites for both pits, i.e. when the pits are operating at the same time? Where in the draft conditions are the locations for these sites described, or are they proposed to be left to management plans?	Regarding wind/met monitoring sites, we note the following: • Multiple dust monitor locations are proposed to cover both the existing Drury Quarry pit and the proposed Sutton Block (refer to Figure 10 of the Air Quality Assessment Technical Report K which shows the location of proposed dust monitors). • One meteorological (Met) monitoring station is proposed for both sites (refer to Section 2.2 and 5.5.3 of the Air Quality report). This one station is considered sufficient to provide meteorological data for both pits. • Condition 27 has been amended to require the locations of the dust and Met monitoring stations to be include in the DMP. This is also referred to in Conditions 128 and 129, which set out the 'Monitoring and Reporting Conditions' for the dust and Met stations. Regarding noise monitoring sites, we note the following:

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					• Multiple noise monitoring locations are proposed to cover both the existing Drury Quarry pit and the proposed Sutton Block. New noise monitoring locations will be established for Sutton Block (refer to Condition 87). • A map of the location of these monitors will also be provided under section 4.4.1 'Long-term Noise Monitoring' of the draft QMP. Regarding blast/vibration monitoring sites, we note the following: • Multiple blasting/vibration monitoring locations are proposed to cover both the existing Drury Quarry pit and the proposed Sutton Block. New blast monitoring station(s) locations will be established for Sutton Block (refer to Condition 98). Generally, the location of monitoring sites is proposed to be left to management plans, to allow for flexibility to identify the most suitable locations depending on the stages of pit development.
				[47] Have any complaints from neighbours or Council enforcement action arisen for the existing quarry activity resulting from night time activities, specifically as a result of light spill or glare? Or is there evidence (measurements) that night time activity at the existing quarry complies with the relevant lighting standards of the AUP:OP?	As a result of light spill and glare, the following complaints have been received: • **August 2022:** 96 Peach Hill Road and 98 Peach Hill Road, Drury. **Action taken:** Lights were adjusted down and shrouded. Only lights that were needed at night were left on. • **May 2023:** 93 Macwhinney Road, Drury. **Action taken:** Lights were adjusted twice. Site visit 23rd July and neighbour was happy with improvement made with adjusting the lights.
				[48] Notwithstanding the proactive approach to community liaison, is it a requirement, through conditions of the resource consent(s) for the existing quarry activity, to facilitate a formal Community Liaison Group process? Or is there an informal CLG in place?	There is no requirement as part of the conditions of the resource consent(s) for the existing quarry activity to facilitate a formal Community Liaison Group, nor is there are CLG in place. SAL has a dedicated engagement manager who proactively communicates with the local community through a range of methods, including in-person meetings, letter drops and online updates.
				[49] Does the applicant have a current long-term masterplan for how the landholdings are to be rehabilitated upon closure of the quarrying activity? It is understood that such information is required in response to the conditions of the resource consent(s) for the existing quarry activity; however, by extending the duration of activity on the site through this application, does that curtail timing for potential rehabilitation of the existing quarry pit on the site, for example?	There is currently no long-term masterplan for how the landholdings are to be rehabilitated upon closure of the quarrying activity. However, proposed Condition 66(g), requires that the QMP be updated to include closure and rehabilitation plans within 5 years of confirmed closure. Condition 66(g) is not intended to delay any rehabilitation of the existing Drury Quarry, which will becommunicated to Auckland Council and any necessary approvals sought ahead of closure.
				[50] The record of property titles provided with the application material include many references to various instruments, including covenants and consent notices. Please provide a table summarising these instruments, where relevant to the applications before the Panel.	There are 13 registered instruments across the Sutton Block Records of Titles. We have provided a summary table at **Attachment H** on each of these instruments. A copy of the registered instruments can be provided if required. In summary, there are: • Three covenants that relate to vegetation protection. One relates to the resource consent recently varied, so an update is required to the registered instrument. One relates to vegetation outside of the Project Area. One relates to vegetation not affected by the Project. • A fencing agreement which is not relevant to the Project. • A water right that is outside of the Project Area. • A consent notice relating to stormwater detention and disposal and the need for further engineering support – this is satisfied through the assessment in the Groundwater and Surface Water reports for the substantive application. • A right of way easement that is not affected by the Project. • The remaining six land covenants provide no complaints covenants in favour to SAL. These covenants apply to some of the properties invited to comment on the Project by the Panel (see the spreadsheet at **Attachment I** – highlighted in yellow).

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					Please refer to registered interest summary table attached as **Attachment H**.
				[51] At the end of Stage 4 and prior to Stage 5 commencing, it is understood that the northern bund is to be removed with this area becoming part of the quarry pit. How will protection of planting occur in this area (adjacent the ONL extent) and will additional planting be required outside of the pit extent in the location previously occupied by the northern bund? How will the immediate interface between the ONL and the quarry pit be perceived long-term?	The response is provided in separate portions to ensure all questions are addressed. Q: How will protection of planting occur in this area (adjacent the ONL extent) A: Exotic planting (adjacent the ONL extent) will be protected through Condition 35(h) which states "The implemented planting shall be monitored and maintained for the duration of the Project". Further, Condition 99 requires the restoration planting to be protected in perpetuity. Q: Will additional planting be required outside of the pit extent in the location previously occupied by the northern bund? A: The area previously occupied by the northern bund will become the quarry pit, therefore no planting will occur in the previous footprint of the northern bund. How will the immediate interface between the ONL and the quarry pit be perceived long-term? A: Building on earlier stages, the Stage 5 quarry pit will continue to be set back from the ONL boundary. As a result, the ONL will interface with the proposed exotic tree planting rather than the quarry footprint itself. Over the anticipated 50-year project duration, visibility of this interface will generally be limited to views from the north (e.g. along Sonja Drive). From these positions, the edge between the ONL and the quarry will appear as a treed buffer with established native vegetation planted in the foreground (as part of the ecological and landscape mitigation package, replacing what is currently observed as pasture.
				[52] While the intent to establish fast-growing exotic vegetation is understood; how does such a mitigation strategy integrate with the wider restoration and rehabilitation of the site through establishing revegetation? Is a long-term approach required which would see the ultimate removal of this exotic vegetation with these areas also becoming revegetated?	The landscape and visual mitigation strategy has a different primary objective than the ecological mitigation strategy. While the former focuses on achieving effective visual screening and maintaining landscape character, the latter seeks to restore ecological values through native revegetation. These two strategies are, however, complementary. The ecological response will deliver native revegetation across the site, which will help integrate the project into the wider landscape over time. The exotic vegetation has been selected for its fast growth, resilience, and longevity, ensuring effective screening during the operational life of the project (anticipated to be 50 years). Importantly, this exotic planting—particularly to the north and west—will not stand alone. It will be supported by a secondary layer of native planting which will progressively establish throughout the project's duration. In the long term, the exotic vegetation is expected to remain in place for the life of the project. However, as the native planting matures, reliance on the exotic species for screening will reduce. Beyond the project's operational period, the established native vegetation adjacent to the exotic planting is anticipated to provide the long term landscape integration benefits, aligning with wider restoration and rehabilitation outcomes.
				[53] Please provide further detail on how the proposed new haul road, which is to be established in Stage 1, will cross the stream channel that is to be retained – will this be a bridge / culvert? If plans are available, please provide these.	It is proposed to install a culvert to gain access. Please refer to the plans/construction methodology provided as part of the ESCP Drawings in Technical Report R, Volume 2 of the AEE. The 'Enabling works' and 'Stage 1: Phase 1' to 'Stage 1: Phase 9' (Drawing No. ESCP-DQSB-01 to ESCP-DQSB-10/ Sheet No. 1 to 10), provide details on management of the stream channel to enable the construction of the Sutton Block Access Haul Road, installation of the culvert and Permanent Stream Diversion Channel for Stream 4. The NW Haul Road (Drawing No. ESCP-DQSB-HR-01/ Sheet No. 12) also provides details on the widening of the existing access track to form a 12m wide haul road.