

Comments on Drury Quarry Expansion (Sutton Block)

From upper Ponga Road neighbouring residents:

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1. Introduction

These comments are provided by neighbours of the proposed Drury Quarry Sutton Block expansion who live to the north of the site.

We have been residents of the area for up to 25 years and value the character and amenity of our rural environment. We rely on rainwater as our primary drinking water source and there are unique ecological values which may be threatened or lost through the quarry expansion.

We are making these comments because we value the ecological integrity of the existing environment and have significant concerns regarding the ecological effects, the potential drawdown of groundwater, and the impacts of noise, vibration and dust on health and water quality. We are concerned that these effects will lead to additional or increased requirements for property maintenance.

2. Summary of Key Concerns

- Loss of rare species and ecological habitats. (Native Geckos and long tail bats)
- Impacts on groundwater levels and hydrology, with possible consequences for wells, wetlands, and streams.
- Dust emissions and their effect on rainwater collection systems and water quality.
- Adverse effects of new or increased noise and vibration from quarry activities, as well as traffic movements.
- Visual change to the outlook and landscape from and around our properties.
- Long-term, possibly irreversible ecological degradation.
- Insufficient mitigation, monitoring, and enforceable guarantees.

3. Quarry Operations

We need more information to understand more clearly the following aspects of the quarry expansion and the potential impacts on our properties:

- **Hours of operation** – will the quarry operate only during daytime hours, with no night time or early morning activities, especially on weekends, including traffic movements, blasting and processing activities.
- **Quarry staging** - What are the approximate dates/years for each quarry stage. What does stage 5 involve?

Page 2 of 6

4. Ground conditions

We are concerned that expanding the quarry towards our properties may lead to adverse effects on ground stability. For example, properties around the Three Kings Auckland quarry experienced subsidence and cracked foundations due to groundwater drawdown which destabilised the area. What investigations have been undertaken to ensure a clear understanding of ground conditions and the effects on stability of our properties?

5. Quarry access

We are concerned about the traffic effects on our properties in relation to heavy vehicle movements, greater traffic volumes and potential noise and safety effects. In particular we would like to understand:

- What are the current and future plans for accessing the quarry?
- What guarantees are provided that Ponga Road will be kept free of all quarry traffic?
- What are the expected vehicle movements over the various phases of the quarry project?
- On which roads are these expected to take place?

6. Ecological Effects

The expansion will directly impact areas of native bush, wetland features, and streams. Independent ecological assessments acknowledge that the effects are rated as high to very high. Of particular concern are the adverse effects on nationally critical species such as long-tailed bats and New Zealand Tree Gecko, which have been identified in the

vicinity. The proposal appears to underestimate the risks to rare and threatened species and further investigation is required.

The proposed mitigation—replanting small areas and pest control—is inadequate to compensate for the permanent loss of complex habitats. Full ecosystem functionality could take over 100 years to re-establish, which represents an unacceptable generational loss.

7. Environmental degradation

- Have the surrounding flora, fauna, and water features been accurately quantified?
- What monitoring is in place to quantify the effects of the quarry?
- What effect is the quarry expected to have on streams and ground water in and around nearby QE2 covenanted areas and other ecological areas?

8. Groundwater and Hydrology

The quarry application briefly mentions adverse but unquantified effects on streams and groundwater near the quarry. There is no mention of adverse effects on water (ground, surface, and rainwater) in the wider quarry neighbourhood.

The Ponga Rd properties are uphill and downwind from the quarry and are bound to experience the immediate adverse effects of changes to groundwater levels arising from work within the quarry. Page 3 of 6

In addition, as we depend on rainwater collection for drinking water and will be directly downwind, we are deeply concerned about the effect of dust emissions on drinking water, as discussed below.

The proposal also lacks sufficient detail on the drawdown of groundwater. Key questions remain unanswered:

- What changes in water quality are expected?
- How will this be monitored and what are the remedies when problems occur?
- How safe will bore and rainwater be (e.g. contaminated bore water or polluted rainwater because of increased silicate particles, fumes, dust, etc).
- How deep and extensive will drawdown effects be?
- What impacts will this have on neighbouring wells and household water supplies?

- How will wetlands, streams, and riparian ecosystems be affected by changes in hydrology?

Without robust hydrological modelling and baseline data, the risk to local water systems remains high.

9. Dust Effects on Drinking water

As stated above, we are neighbours who depend on rainwater collection for drinking water. As we will be directly downwind, we are deeply concerned about dust emissions on our rainwater collection for drinking water. Quarry dust can deposit on roofs, gutters, and storage tanks, contaminating drinking water and increasing the need for costly maintenance and filtration.

The current dust monitoring regime (sampling every six days) is inadequate to capture peak events during dry, windy conditions. More frequent, independent monitoring and public reporting are needed. The applicant has not provided clear commitments to compensate or mitigate impacts on private rainwater supplies.

10. Health effects

Clearer information is required to understand the short-term and long-term health effects that could arise from the quarry activities e.g. silicosis, respiratory issues from dust. It is essential to understand how such effects will be monitored and mitigated and whether the applicant proposes to pay for regular health monitoring checks for people in the neighbourhood to ensure that there are no developing negative health conditions.

11. Visual and light pollution

Additional information is required to understand the visual effects, including landscape changes and lighting at night. It appears that much of the assessment and proposed mitigation is taken from the end of Sonja Road. In particular:

- What are the sightlines to the new quarry area from different points along Ponga Road?
- Does the hill behind #1598, 1604, 1616, 1679 remain as it is?
- How will the lighting be contained exclusively within the quarry site?

- What effects will lights have on the night sky or views towards horizon (e.g. the sky towards the horizon above the Glenbrook area and towards the Clevedon area often has an artificial orange-red glow at night).

12. Noise pollution

We are very concerned about potential increases to noise levels affecting the enjoyment of our rural properties. Greater explanation is required in relation to:

- Have current noise levels been quantified at sites along Ponga Road and around the new quarry area?
- Exactly what are the noise levels expected at different times of the day, the week, and the year (i.e. busy seasons/low seasons, etc).
- What is the expected change in noise levels, especially downwind, compared to current levels?
- Will there be blasting or sudden loud noises?
- What is the noise management, notification, and monitoring plan?
- What are the remedies when noise levels increase above agreed levels (financial penalties, site shut down, etc).

13. Vibration

We are concerned about the effect of vibration on our properties from quarry activities, including excavation, blasting and processing. The potential effects may adversely affect ground stability, as well as amenity effects.

14. Air pollution

We need to understand the potential changes and effects on air quality at our properties:

- Has current air quality been quantified at sites along Ponga Road and around the new quarry area?
- What are the types of particulate matter/dust that will be released into the atmosphere?
- What is the expected change in air quality at downwind sites compared to current quality?

- What are the remedies when air pollution levels increase above agreed levels (financial penalties, site shut down, etc).

15. Inadequacy of Mitigation and Offsetting

Proposed offsets (e.g. planting 3 hectares of bush, pest control on 28 hectares) do not match the scale or quality of what will be lost. Offsetting in distant areas does little to preserve local biodiversity and ecological connectivity. Rehabilitation will take decades, if not centuries, to restore functional ecosystems. Expansion of the quarry should not be allowed if adverse effects do not adequately address loss of ecological values. Page 5 of 6

16. Conditions Requested

We request that if consent is granted then appropriate, robust and enforceable conditions must be imposed. We consider that such conditions should include:

- Independent, seasonal ecological surveys for rare and threatened species before works commence.
- Exclusion of existing high value ecological areas from the quarry working areas, as an outcome of the pre-commencement surveys and restoration and offset targets, with financial bonds to ensure compliance.
- Revegetation and environmental enhancement strategy to be certified and the first stages given effect to before works can proceed for the expansion of the quarry, with effective and enforceable maintenance, replacement and monitoring of such requirements.
- Explicit conditions setting limits on hours of operation, noise levels, vibration and light pollution from the quarry.
- Exclude Ponga Rd from being used for quarry access and activities other than environmental monitoring.
- Quantifiable and independent water system survey (ground, surface, rain) across several wet and dry seasons before any changes in water usage are allowed.
- Comprehensive groundwater monitoring throughout the consent period, with safeguards for neighbouring bores and ecosystems.
- Frequent, independent dust monitoring, including peak event measurement, with results publicly available.

- Compensation to be payable to surrounding properties if dust monitoring identifies dust effects on adjacent sites, including the additional cost of maintenance due to quarry activities (house washing, tank cleaning, water testing, water filtration).
- Provision for how compensation will be addressed and funded throughout life of the quarry for remediation of issues caused by the quarry e.g. ground subsidence, degradation of local flora and fauna.
- Live environmental effects monitoring along Ponga Rd as below subject to legally and financially enforceable penalties.

In addition, conditions should be imposed on the eventual rehabilitation and reinstatement of the quarry working areas progressively as working areas are completed.

17. Ongoing Environmental Monitoring

Through conditions, if consent is granted, ongoing live monitoring should be required for:

- The quarry application mentions that some live monitoring for dust takes place in the quarry and its immediate vicinity.
- 1598, 1604, 1616, 1679 are all directly downwind from the quarry but no monitoring has been done at these properties.
- Monitoring stations with enforceable thresholds should be installed for these properties so that the quarry's effects on its neighbours can be genuinely measured and acted upon when thresholds are breached.

Page 6 of 6

18. Conclusions

Given the scale of ecological loss, risks to rare species, uncertainty around environmental (noise, lighting, visual, vibration and traffic effects) and groundwater impacts, and significant potential harm to our drinking water supplies, we oppose the proposal in its current form.

As a minimum, far more robust conditions, monitoring, and protections are required before any expansion should be considered.

We request that panel applies the precautionary principle: where there is risk of serious or irreversible harm, the project should not proceed without robust, independently verified evidence that effects can be safely avoided or fully mitigated.

Signed by Ruth Edgar as nominated spokesperson for the residents listed above:

Ruth Edgar