

Your Comment on the Drury Quarry Expansion – Sutton Block application

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
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2. We will email you draft conditions of consent for your comment			
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Please provide your comments below, include additional pages as needed.

The Auckland Conservation Board Commentary on the Fast-Track Proposal for the Drury Quarry Expansion - Sutton Block (FTAA- 2503-1037)

Summary of Commentary:

- In this commentary, the Auckland Conservation Board (ACB), restricts itself to matters of the Proposal that have conservation implications.
- The Application proposes the forecasted expansion of a major 80-year old quarry into the adjacent designated quarrying zone for a further 50 years. However, it plans to now remove significant additional native vegetation, extending beyond the designated Auckland Unitary Plan Special Purpose Quarry Zone.
- The primary potential impacts of the Proposal appear to be those due to removal of these important native vegetation blocks (in particular, in Significant Ecological Areas SEA_T_5323 and SEA_T_1177), and the subsequent impacts on native wildlife, especially lizards.
- The Proposal appears to have adequately addressed all the major environmental impacts expected during clearing and operation of the quarry, and has produced environmental management plans to minimise, ameliorate or provide ecological offset for these impacts on native wildlife. Most of these management plans appear to be adequate, but we support the amendments to the Lizard Management Plan (LMP) provided by the Department of Conservation (DOC.) In particular, we endorse the DOC recommendation of a 10-year timeframe for the wildlife approval.
- Based on the information currently available, it is therefore expected that there will be some major impacts on native vegetation, terrestrial/aquatic fauna and the environment, but these will be minimised ***IF*** all proposed measures to mitigate conservation impacts and restore indigenous ecosystem health across the project site are fully implemented. It appears hard to justify the claim that there will be a net ecological gain, given the certainty of some important wildlife destruction (including endangered rock forest), and uncertainties of the future success of lizard translocations and reforestation, particularly as it appears that the Hingaia Island offset planting will not now be undertaken.
- To maintain a minimal impact, there needs to be requirements and monitoring in place to ensure that all environmental management plans are actually implemented. As such, we strongly support the DOC call for greatly improved management plan conditions, to ensure that the Project is not reliant on “unenforceable, qualitative [mitigation] objectives” (DOC Wildlife Approval Report, section 6.7).
- Finally, we provide a list of what the ACB recommends should be among the Required Conditions for this Proposal to proceed, based largely on the recommendations included within both the Proposal’s environmental and ecological management plans, and the feedback on these from both DOC and iwi.

Scope of Commentary and Consultation

- The Tāmaki Makaurau Auckland Conservation Board (ACB) is an independent statutory body appointed by the Minister for Conservation. The Board was established by the Conservation Act

1987, s 6L. The Board has a statutory role in advocating its interests in any public forum or in any statutory planning process.

- The ACB here restricts itself to matters of the Proposal that affect conservation of the environment and native wildlife.

- Due to time constraints, we have not been able to obtain comment about this Proposal from other conservation organisations.

- Our comments as outlined below, are based on reviewing the key relevant Proposal documents including:

- Fast Track Approvals Act Wildlife Approval Report from DOC dated 10th September 2025, FTTA -2503-1037 Drury Quarry Extension, Sutton Block.
- Bioresarches Ecological Management Plan dated 7th July 2025
- Tonkin and Taylor Application for resource consent and Assessment of Environmental Effects We ddated March 2025

Major Potential Conservation Impacts of the Proposal

Native Lizard Impacts

Based on our review, the most significant impact will likely be on the native lizards and their habitat. The DOC have provided substantial documentation (10th September 2025) on the Lizard Management Plan (LMP) with a recommendation that all salvage and relocation be undertaken by a qualified DOC staff member, or a DOC appointed herpetologist.

Under the LMP, there are a number of native species of lizard identified that require protection. The plan is to remove lizards from the working site and relocate them to a safe haven. Efforts will be made to ensure they do not return to the site using net fencing. The planned native forest restoration will in time encourage the survival of the lizard species. We note that in accordance with Wildlife Act requirements herpetologist authorised by DOC and not the council be responsible to manage the LMP.

We note in the DOC Wildlife Approval Report that implementation of the LMP will provide minimal protection to salvaged lizards, and that that the revised plan is only appropriate for four of the six species for which approval is sought (3.3). We endorse DOC's conclusion that, if approved the lizard management plan is adopted for relocating four species – the copper skink, ornate skink, elegant gecko, and forest gecko. And that additional mitigation conditions are developed for pacific gecko and striped skinks if these species are to be relocated. We endorse the Department of Conservation's recommendation of a 10-year timeframe for the wildlife approval as it is likely that habitat conditions and other factors will change significantly over a decade.

In point 6.7 of the Tonkin and Taylor report, it is stated that environmental monitoring and reporting must be adhered to. We have noted DOC's concern on who would manage the LMP, and concur that this must be done with DOC involvement/approval.

We support the additional Conditions proposed by DOC, including:

- the LMP is amended to require mouse control as part of pest control measures
- the LMP is amended to increase the number of eco-stacks currently proposed by the applicant in the LMP
- the LMP is amended to require the staging of eco-stacks by constructing them on the release site several months earlier than currently proposed.

In addition to the LMP the project application includes an Ecological Management Plan with proposed actions to mitigate conservation impacts and restore native ecosystems. These include action plans for protecting and restoring a range of wildlife.

If the proposed measures included in these plans are effectively implemented, this will minimise ecological impacts arising from the project.

Native bat impacts

While no native bats were recorded on the site during the surveys, long tail bats have been seen nearby.

The bat management plan outlined in the report appears to be adequate, and should be implemented.

Native avifauna impacts

To ensure native avifauna is protected, no vegetation removal is to occur over the breeding season from 'identified' nesting sites. Native tree regeneration over time will encourage native avifauna to repopulate the site.

Native freshwater fauna impacts

As outlined in the report, work is required to ensure recovery and relocation of native fish and other species from affected streams on the site. Also required is the plan to stop native fish re-entering the site.

Vegetation impacts

Two Significant Ecological Areas (SEA_T_5323 & SEA_T_1177) will be greatly impacted, the latter removed entirely. These are occupied by a variety of rare vegetation types, including endangered rock forest.

On page 71 of the T&T report it is stated "Ecological offset must be adhered to "with regard to native revegetation and riparian planting. Over the programme period the area of native scrub (kanuka), exotic scrub/pines and native broadleaf lost to development (16.7 Ha) will require offset native planting to a total area of 57.97 Ha. This includes 'rock forest' plants around the historic pa site (Kaarearea Pa). Within 6 months of the 10th anniversary of each planting programme being completed, the consent holder must achieve what is stated. If not, remedial planting must be carried out until 80% canopy cover is achieved.

The riparian planting plan must be put in place around identified wetlands and streams on the site.

Biosecurity impacts

A mammalian and pest weed control programme must be put in place as stated in the report, to cover the restoration planting area and riparian wetland sites, including streams. In particular, we support the DOC call for mouse control to be included for lizard protection.

A Net Gain Delivery Plan for mammalian pest and weed control must be put in place, as outlined in the Residual Effects Analysis Report: Terrestrial Ecology (REAR:TE).

Cultural impacts

The historic Pa site (Kaarearea) must be fenced off from the development site and any future archaeological sites must be mapped and protected. Ongoing communication with the local Tangata whenua must be initiated/maintained.

We note that Te Ākitai Waiohū has expressed concerns about the removal of additional indigenous vegetation and habitats in Significant Ecological Areas (SEAs), particularly in relation to Stage 5, and support their call for additional buffer planting and more comprehensive monitoring of planting success.

Required Conditions to the Proposal

For Native Lizards:

- the agreed Conditions listed in the LMP, including all DOC-recommended alterations, in particular:

- a 10-year timeframe for the wildlife approval
- inclusion of mouse control as part of pest control measures
- more, and earlier-established eco-stack artificial habitats.

Noting that the current LMP is appropriate for four species – the copper skink, ornate skink, elegant gecko, and forest gecko and additional mitigation conditions will need to be developed for pacific gecko and striped skinks if these species are to be relocated.

For bats:

- adequate surveillance, avoidance and provision of artificial roosts before vegetation removal

For avifauna:

- adequate surveillance and avoidance of nesting birds

For freshwater fauna:

- adequate capture and relocation plans for freshwater fauna
- Sedimentation ponds and earth bunds must be put in place to ensure sediment does not flow into streams identified in the report. Regular checks are required to ensure no sediment flow is affecting aquatic life.

For vegetation:

- adequate native revegetation and riparian planting is required in an attempt to replace some of the lost vegetation biodiversity values.
- additional buffer planting and more comprehensive monitoring of planting success.

For biosecurity:

- An adequate mammalian and pest weed control programme must be put in place, including for mice.

For Cultural impacts:

- establish ongoing communication with the local Tangata whenua to ensure adequate protection of the historic Pa site, archaeological sites, and culturally significant vegetation sites.