

Auckland Unitary Plan (Operative in Part) - Assessment of objectives and policies

This table sets out a full assessment of all objectives and policies of the RPS, regional plan and district plan components of the AUP. In assessing these objectives and policies, attention is drawn to section B1 of the AUP, which states that objectives and policies at a higher level are given effect at every lower level.

A number of the objectives and policies, particularly at the RPS level, are directed towards the promulgation of regional and district plans (including matters to which Auckland Council must give particular regard), and accordingly those matters are not relevant to this resource consent application. Failure to list and respond to those matters is simply a reflection of that fact.

Table 1: Chapter B Regional Policy Statement

	Reference	RPS Objective/Policy	Commentary
	B2. Tāhuhu whakaruruhau ā-taone - Urban growth and form		
	B2.2. Urban growth and form		
1.	B2.2.1 Objective (1)	A quality compact urban form that enables all of the following: (a) a higher-quality urban environment; (b) greater productivity and economic growth; (c) better use of existing infrastructure and efficient provision of new infrastructure; (d) good accessibility for all people, including by improved and more efficient public or active transport; (e) greater social and cultural vitality; (f) better maintenance of rural character and rural productivity; (g) reduced adverse environmental effects; and (h) improved resilience to the effects of climate change.	Development of the Sutton Block will help achieve, and is therefore consistent with, this objective because it will enable: “a higher-quality urban environment”, “greater productivity and economic growth”, and “improved and more efficient public transport” through providing an additional 240 MT of high quality, locally sourced aggregate to the Auckland market, opposed to sourcing aggregate from outside the Auckland Region or through the development of multiple smaller quarries. Rock aggregate is a foundation and building product and a fundamental component of concrete. It provides a critical role in various construction and civil engineering projects. The Economic Impact Assessment (Technical Report S, Volume 2) concludes that the cost saving derived from the lower transport requirements of sourcing aggregate from Drury Quarry is between \$29.4 million to \$62.5 million per tonnes of aggregate based on transport, environmental and social related costs. This cost saving will contribute to greater productivity and economic growth by providing a sustained

	Reference	RPS Objective/Policy	Commentary
			availability of cost-effective aggregate to enable future urban growth opportunities as well as improving the resilience to the effects of climate change through reduced carbon emissions. It will also achieve “better use of existing infrastructure” as the Sutton Block is an expansion to the existing Drury Quarry and will use the existing ancillary site infrastructure and public infrastructure (such as roading and stormwater network) that has been designed to accommodate the existing Drury Quarry. Overall, the quarrying activity at Drury will provide significant regional benefits and is vital for the growth and maintenance of the region, both in regard to housing, business and infrastructure.
B2. Tāhuhu whakaruruhau ā-taone - Urban growth and form			
B2.3. A quality built environment			
2.	B2.3.1 Objective (2)	Innovative design to address environmental effects is encouraged.	The Sutton Block is proposed to be a state-of-the-art ‘quarry of the future’. Central to its design philosophy are principles of sustainability, to minimise the environmental footprint of its operation as far as practical. Notably, carbon reduction will be a key consideration, achieved through the reduction in diesel-powered dump trucks and eventually the utilization of an electric conveyor. Further, SAL will apply a best practice approach to managing adverse environmental effects during the development of the Sutton Block. This approach has been taken on the basis that, because these approaches have been tested and proven, they provide certainty around minimising the level of adverse effects as far as practicable. The project is consistent with this objective.
3.	B2.3.1 Objective (3)	The health and safety of people and communities are promoted	No public access to the Sutton Block pit will be provided and the measures proposed to manage health and safety will protect people and communities.
B3. Ngā pūnaha hanganga, kawekawe me ngā pūngao - Infrastructure, transport and energy			

	Reference	RPS Objective/Policy	Commentary
	B3.2 Infrastructure		
4.	B3.2.1 Objective (1)	Infrastructure is resilient, efficient and effective.	Ensuring the seamless provision of infrastructure is vital for a resilient and well-functioning city and society. However, the design, consenting and development of large-scale infrastructure is not a straightforward exercise and often involves long timeframes. For this reason, the efficient development of infrastructure is recognised and enabled through these objectives and policies. While the proposed Sutton Block is not defined as infrastructure (rather it is an aggregate extraction activity), a large part of the need for continued aggregate supply is to support the maintenance and development of infrastructure. Without this aggregate supply, it is likely that the provision of infrastructure would be compromised. Aggregate extraction can only take place where it is found naturally in situ and preferably is extracted in close proximity to demand in order to minimise the environmental effects and costs of transporting aggregate from the pit to the construction site. Due to its accessibility and proximity to projected future growth areas in South and East Auckland the Sutton Block is expected to save costs of transport compared to alternative sources. This proximate and affordable local aggregate source will contribute directly towards efficient development and upgrading of infrastructure in accordance with Objective 1 and Policy 1. The Sutton Block has been designed to avoid, remedy or mitigate effects on natural and physical resources and where that is not possible to offset or compensate for them to the extent practicable. This is consistent with Objective 3 and Policy 6.
5.	B3.2.1 Objective (2)	The benefits of infrastructure are recognised, including: (b) enabling economic growth.	
6.	B3.2.1 Objective (3)	Development, operation, maintenance, and upgrading of infrastructure is enabled, while managing adverse effects on: (a) the quality of the environment and, in particular, natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character; (b) the health and safety of communities and amenity values	
7.	B3.2.1 Objective (4)	The functional and operational needs of infrastructure are recognised.	
8.	B3.2.2 Policy (1)	Enable the efficient development, operation, maintenance and upgrading of infrastructure	
9.	B3.2.2 Policy (6)	Enable the development, operation, maintenance and upgrading of infrastructure in areas with natural and physical resources that have been scheduled in the Unitary Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character while ensuring that the adverse effects on the values of such areas are avoided where practicable or otherwise remedied or mitigated	
	B5. Ngā rawa tuku iho me te āhua – Historic heritage and special character		
	B5.2 Historic Heritage		
10.	B5.2.1 Objective (1)	Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.	There is a Historic Heritage Overlay Extent of Place (693, Kaarearea Paa/Ballard’s Cone Pā site, R12_278) overlay

	Reference	RPS Objective/Policy	Commentary
11.	B5.2.2 Policy (6)	Avoid significant adverse effects on the primary features of significant historic heritage places which have outstanding significance well beyond their immediate environs including: (a) the total or substantial demolition or destruction of any of the primary features of such places; (b) the relocation or removal of any of the primary features of such places away from their original site and context.	located at the centre of the SAL landholdings and immediately south of the Sutton Block LOQ footprint. This area is a wāhi tapu historic pā site which is scheduled in the New Zealand Archaeological Association (NZAA) database as a historic heritage place. The proposed area of works avoids this overlay. In addition, as a result of engagement with Mana Whenua, the proposed Sutton Block was moved further north from Kaarearea Paa, creating a 13 ha buffer between the LOQ extent and the Historic Heritage Overlay. Covenants are proposed to be put in place over Kaarearea Paa to provide further protection of this area from future use and development. This is consistent with Objective 1, and with Policies 6-8. As detailed in the Landscape and Visual Amenity Effects Assessment (LVEA) (Technical Report J, Volume 2), there are also approximately seven recorded NZAA sites within the Drury Quarry Zone and Quarry Buffer Area, two of these sites are in close proximity and one is within the project area. The known archaeological features of the two sites in close proximity will be avoided by the Project. This is consistent with Objective 1, and with Policies 6-8. The one impacted site (R12/724) is a 20 th century farming feature and therefore, does not fall under the archaeological provisions of the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA 2014) as it relates to post-1900 activity.
12.	B5.2.2 Policy (7)	Avoid where practicable significant adverse effects on significant historic heritage places. Where significant adverse effects cannot be avoided, they should be remedied or mitigated so that they no longer constitute a significant adverse effect.	
13.	B5.2.2 Policy (8)	Encourage new development to have regard to the protection and conservation of the historic heritage values of any adjacent significant historic heritage places.	
	B6. Mana Whenua B6.2 Recognition of the Treaty of Waitangi/Te Tiriti o Waitangi partnerships and participation		
14.	B6.2.1 Objective (1)	The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are recognised and provided for in the sustainable management of natural and physical resources including ancestral lands, water, air, coastal sites, wāhi tapu and other taonga.	SAL has undertaken consultation with iwi in the region and continues to undertake consultation to ensure that their views regarding the proposal can be taken into account, are recognised and can be addressed where at all possible (refer

	Reference	RPS Objective/Policy	Commentary
15.	B6.2.1 Objective (2)	The principles of the Treaty of Waitangi/Te Tiriti o Waitangi are recognised through Mana Whenua participation in resource management processes.	to Consultation documents attached as Appendix F, Volume 1).
16.	B6.2.2. Policy (1)	Provide opportunities for Mana Whenua to actively participate in the sustainable management of natural and physical resources including ancestral lands, water, sites, wāhi tapu and other taonga in a way that does all of the following: (a) recognises the role of Mana Whenua as kaitiaki and provides for the practical expression of kaitiakitanga; (b) builds and maintains partnerships and relationships with iwi authorities; (c) provides for timely, effective and meaningful engagement with Mana Whenua at appropriate stages in the resource management process, including development of resource management policies and plans; (d) recognises the role of kaumātua and pūkenga; (e) recognises Mana Whenua as specialists in the tikanga of their hapū or iwi and as being best placed to convey their relationship with their ancestral lands, water, sites, wāhi tapu and other taonga; (f) acknowledges historical circumstances and impacts on resource needs; (g) recognises and provides for mātauranga and tikanga; and (h) recognises the role and rights of whānau and hapū to speak and act on matters that affect them.	The AUP and ArchSite identify known cultural features within the site, as do the CVAs provided by Mana Whenua. Specifically, the site contains Kaarearea Paa, which is wāhi tapu to iwi. As part of this consultation, SAL has worked with Ngāti Tamaoho and Ngaati Te Ata Waiohū, to agree on the extent of the Sites and Places of Significance to Mana Whenua over Kaarearea Paa under Plan Change 102. As described in Section 10.5 of the AEE, SAL are working closely with Ngāti Tamaoho, Ngaati Te Ata Waiohū, Te Ākitai Waiohū, Ngāi Tai ki Tamaki and Ngāti Whanaunga with the intention of building a partnership with them. SAL has received draft CVAs from Ngāti Tamaoho, Ngāti Te Ata Waiohū, Ngaati Whanaunga and Ngāi Tai Ki Tāmaki which has provided important background context and information about the places and values of importance on site. In recognising the role of Mana Whenua as kaitiaki with specialist historical knowledge of the area, feedback received through the engagement process has directly influenced the design of the Sutton Block. Specifically, the proposed Sutton Block was moved further north from Kaarearea Paa, creating a 13 ha buffer between the LOQ extent and the Historic Heritage Overlay which also resulted in a reduction in stream and wetland loss. In addition, SAL have been working with Mana Whenua to identify opportunities for kaitiakitanga and working together to protect sites of significance.

	Reference	RPS Objective/Policy	Commentary
			The Project is consistent with Objectives 1 and 2, and with Policy 1.
	B6. Mana Whenua B6.3. Recognising Mana Whenua values		
17.	B6.3.1 Objective (1)	Mana Whenua values, mātauranga and tikanga are properly reflected and accorded sufficient weight in resource management decision-making.	To the extent that this objective relates to the assessment of effects, rather than the resource consent decision process, it is considered that this objective is met as set out in Section 9 of the AEE. SAL has undertaken extensive engagement over a 3-year period with various Iwi groups and has received a number of final and draft CVA reports. The draft and final CVAs prepared by Ngāti Tamaoho; Ngāti Te Ata; Ngaati Whanaunga and Ngāi Tai Ki Tāmaki discuss the overall site and locality and the areas of significance to them. While each CVA is different and identifies things as they pertain to each Iwi or hapu group, there are some common themes also. The Project is consistent with Objectives 1-2, and Policy 1. The CVAs identify the key components of whenua (land), wai (water), hau (air), biodiversity, wāhi tapu and taonga, social, economic and cultural wellbeing and future management. The particular sites of significance within the locality includes Kaarearea Paa; the Hingaia Stream wider catchment including important waterbodies such as Hingaia Stream; Maketu Stream; Mangawheau Stream; Waihoihoi Stream and Waiora Stream; vegetation and associated fauna and taonga species. Although the Sutton Block was re-designed to further avoid effects on wāhi tapu sites such as Kaarearea Paa resulting in reduced stream and wetland loss, the proposed Sutton Block requires unavoidable modification of the whenua and awa
18.	B6.3.1 Objective (2)	The mauri of, and the relationship of Mana Whenua with, natural and physical resources including freshwater, geothermal resources, land, air and coastal resources are enhanced overall.	
19.	B6.3.2 Policy (1)	Enable Mana Whenua to identify their values associated with all of the following: (a) ancestral lands, water, air, sites, wāhi tapu, and other taonga; (b) freshwater, including rivers, streams, aquifers, lakes, wetlands, and associated values; (c) biodiversity; (d) historic heritage places and areas; and (e) air, geothermal and coastal resources.	
20.	B6.3.2 Policy (2)	Integrate Mana Whenua values, mātauranga and tikanga: (a) in the management of natural and physical resources within the ancestral rohe of Mana Whenua, including: (i) ancestral lands, water, sites, wāhi tapu and other taonga; (ii) biodiversity; and (iii) historic heritage places and areas. (b) in the management of freshwater and coastal resources, such as the use of rāhui to enhance ecosystem health; (c) in the development of innovative solutions to remedy the long-term adverse effects on historical, cultural and spiritual values from discharges to freshwater and coastal water; and (d) in resource management processes and decisions relating to freshwater, geothermal, land, air and coastal resources.	

	Reference	RPS Objective/Policy	Commentary
21.	B6.3.2 Policy (3)	Ensure that any assessment of environmental effects for an activity that may affect Mana Whenua values includes an appropriate assessment of adverse effects on those values.	through substantial earthworks and physical works. A range of mitigation and management measures are proposed to address effects associated with earthworks, discharges to water, use and take of groundwater and vegetation removal. These measures include best practice approach to earthworks and sediment and erosion control, including the use of organic treatments options where practicable (at the request of Mana Whenua). The proposed stream augmentation regime will ensure no decrease in stream base flows and will be from the same catchment and puna that naturally feeds the streams to help ensure that the mauri and wairua of the nga awa are maintained. Lastly, the groundwater drawdowns will not result in drawdowns on shallow groundwater or the lava flows below Kaarearea Paa. Proposed conditions of consent require SAL to provide for the opportunity for Mana Whenua to develop cultural monitoring procedures, take and use any native trees felled and comment on draft management plans. The Project is consistent with Policies 2 and 3.
22.	B6.3.2 Policy (4)	Provide opportunities for Mana Whenua to be involved in the integrated management of natural and physical resources in ways that do all of the following: (a) recognise the holistic nature of the Mana Whenua world view; ... (c) restore or enhance the mauri of freshwater and coastal ecosystems.	Opportunities for Mana Whenua to be involved with the project and the management of natural resources on site have been provided and will continue to be provided. This is relevant in regard to (a) and (c). Refer to section 10.5 of the AEE, Volume 1 and the consultation record in Appendix F of the AEE, Volume 1, outlining the engagement with iwi. The Project is consistent with Policy 4.
23.	B6.3.2 Policy (6)	Require resource management decisions to have particular regard to potential impacts on all of the following:	This policy is about decisions rather than applications, however, to assist the Fast Track Panel in making its

	Reference	RPS Objective/Policy	Commentary
		(a) the holistic nature of the Mana Whenua world view; (b) the exercise of kaitiakitanga; (c) mauri, particularly in relation to freshwater and coastal resources; (d) customary activities, including mahinga kai; (e) sites and areas with significant spiritual or cultural heritage value to Mana Whenua; and ...	decision, SAL has set out how it has had regard to matters (a)-(e) in section 9.11 of the AEE, Volume 1.
	B6. Mana Whenua B6.5. Protection of Mana Whenua cultural heritage		
24.	B6.5.1 Objective (1)	The tangible and intangible values of Mana Whenua cultural heritage are identified, protected and enhanced.	SAL recognise and acknowledge the relationship that Mana Whenua have with the land and their cultural heritage. As set out in the CVA's Kaarearea Paa (including its volcanic features, slopes, surrounding ridgelines, streams and wetlands), holds immense spiritual, cultural, traditional and historical significance. Where possible, SAL has worked with iwi to design the Sutton Block footprint to avoid two registered NZAA sites relating to pre-1900 activities (sites of interest to Mana Whenua), including Kaarearea Paa. Specific measures are set out in Section 9.11.1 of the AEE. Extensive native planting and ongoing pest control is proposed along the northern and north-eastern slopes of Kaarearea Paa. The proposed planting will connect up to the existing SEA to the east providing enhanced connectivity for native flora and fauna in an area Mana Whenua have identified as having cultural and spiritual values. Kaarearea Paa will remain fenced off with the fenced extent extended to cover a greater area to ensure ongoing protection of this wāhi tapu site. Kaarearea Paa and all areas proposed to be planted as part of the offset package are proposed to be protected in perpetuity from future development by way of covenants. Ongoing access to Mana Whenua to Kaarearea Paa will be maintained, subject to health and safety requirements. Opportunity for Mana Whenua to undertake cultural monitoring, take and use any native trees felled as part of
25.	B6.5.1 Objective (2)	The relationship of Mana Whenua with their cultural heritage is provided for.	
26.	B6.5.1 Objective (3)	The association of Mana Whenua cultural, spiritual and historical values with local history and whakapapa is recognised, protected and enhanced.	
27.	B6.5.2 Policy (1)	Protect Mana Whenua cultural and historic heritage sites and areas which are of significance to Mana Whenua.	
28.	B6.5.2 Policy (2)	Identify and evaluate Mana Whenua cultural and historic heritage sites, places and areas considering the following factors: (a) Mauri: ko te mauri me te mana o te wāhi, te taonga rānei, e ngākaunuitia ana e te Mana Whenua. The mauri (life force and life-supporting capacity) and mana (integrity) of the place or resource holds special significance to Mana Whenua; (b) Wāhi tapu: ko tērā wāhi, taonga rānei he wāhi tapu, arā, he tino whakahirahira ki ngā tikanga, ki ngā puri mahara, o ngā wairua a te Mana Whenua. The place or resource is a wāhi tapu of special, cultural, historic, metaphysical and or spiritual importance to Mana Whenua;	

	Reference	RPS Objective/Policy	Commentary
		(c) Kōrero Tūturu/historical: ko tērā wāhi e ngākaunuitia ana e te Mana Whenua ki roto i ōna kōrero tūturu. The place has special historical and cultural significance to Mana Whenua; (d) Rawa Tūturu/customary resources: he wāhi tērā e kawea ai ngā rawa tūturu a te Mana Whenua. The place provides important customary resources for Mana Whenua; (e) Hiahiatanga Tūturu/customary needs: he wāhi tērā e eke ai ngā hiahia hinengaro tūturu a te Mana Whenua. The place or resource is a repository for Mana Whenua cultural and spiritual values; and (f) Whakaaronui o te Wa/contemporary esteem: he wāhi rongonui tērā ki ngā Mana Whenua, arā, he whakaahuru, he whakawaihanga, me te tuku mātauranga. The place has special amenity, architectural or educational significance to Mana Whenua.	the Project, and comment on draft management plans is offered as a condition of consent.
29.	B6.5.2 Policy (6)	Protect Mana Whenua cultural heritage that is uncovered during subdivision, use and development by all of the following: (a) requiring a protocol to be followed in the event of accidental discovery of kōiwi, archaeology or artefacts of Māori origin; (b) undertaking appropriate actions in accordance with mātauranga and tikanga Māori; and (c) requiring appropriate measures to avoid, remedy or mitigate further adverse effects.	Should subsurface archaeological evidence be unearthed during construction, or if human remains are discovered, the Archaeological Management Plan (Technical Report T, Volume 2) will be complied with. Proposed as a condition of consent is the opportunity for Mana Whenua to specify steps to be taken in the event of any accidental discovery of tāonga or koiwi.
30.	B6.5.2 Policy (8)	Encourage appropriate design, materials and techniques for infrastructure in areas of known historic settlement and occupation by the tūpuna of Mana Whenua.	As mentioned in row 26 above, the Project avoids two known recorded archaeological sites. The site located within the footprint dates post-1900 activities and Mana Whenua have advised it is not a site of interest to them. Refer to Section 9.12 of the AEE.
B7. Toitū te whenua, toitū te taiao – Natural resources B7.2. Indigenous biodiversity			
31.	B7.2.1 Objective (1)	Areas of significant indigenous biodiversity value in terrestrial, freshwater, and coastal marine areas are protected from the adverse effects of subdivision use and development.	Objective 1 relates to <i>areas of significant</i> indigenous biodiversity and requires these <i>areas</i> to be protected from adverse effects. The objective requires an assessment at the

	Reference	RPS Objective/Policy	Commentary
			"area" level, and in some cases, such as this, the objective can be met despite there being a loss of some biodiversity. As identified through the Assessment of Ecological Effects (Technical Report A, Volume 2), the area proposed for the Sutton Block, is primarily pasture, with pockets of wetlands, streams and bush areas. Some of the bush areas are identified SEA. Accordingly, the proposed Sutton Block pit has been designed and developed, with particular attention being given to these natural values. Key design considerations include: • Avoidance of SEA_T_5349, including highly valued Rock Forest that is located within Kaarearea Paa site. • Avoidance of ONL to the north. • Reduction in the removal of 610 m of stream extent and 5,241m² of wetland area. • Avoidance of the stream and associated freshwater catchment located in the north-eastern corner of the Sutton Block LoQ extent within SEA_T_5323. However, to enable the realisation of the purpose of the SPQZ, there will be loss to indigenous biodiversity. The Project will involve the removal of SEA vegetation, both within and outside the SPQZ. Removal of the SEA vegetation outside the SPQZ has been assessed as having a low – moderate levels of effect. This vegetation has been assessed to predominately consist of low-quality vegetation that is heavily grazed, and lacks native ground cover and understory, despite the SEA scheduling. A comprehensive offset package has been designed to achieve a Net Gain in biodiversity values involving 62 ha of revegetation and 108 ha of native forest enhancement. All areas proposed to be replanted, as well as the surrounding SEA's to the east and

	Reference	RPS Objective/Policy	Commentary
			north of the site within SAL Landholdings, will also be protected in perpetuity by covenants. Although not all indigenous biodiversity is avoided by the proposal, as a result of the redesign, mitigation measures and offset package, the project is considered to be consistent with Objective 1 because the <i>areas</i> of <i>significant</i> indigenous biodiversity are better protected now than they would be without the Project.
32.	B7.2.1 Objective (2)	Indigenous biodiversity is maintained through protection, restoration and enhancement in areas where ecological values are degraded, or where development is occurring.	In this objective, the focus is on <i>indigenous biodiversity</i> . Again, that needs to be assessed at the appropriate habitat scale – it cannot be assessed at the scale of individual flora and fauna. Accordingly, SAL has sought to maintain indigenous biodiversity with high ecological values, located outside the SPQZ where practicable. 7.58 ha of the proposed vegetation loss is within the SPQZ, which is earmarked through the AUP for quarrying activity. Approximately 6.67 ha of vegetation loss will occur outside of the SPQZ. Removal of the SEA vegetation outside the SPQZ has been assessed as having a low – moderate levels of effect. Where indigenous biodiversity values are affected, these will be restored, enhanced or offset as summarised in Section 6.4 of the AEE and detailed in the REAR-TE (Technical Report C, Volume 2). Further, areas of enhancement will be protected in perpetuity through covenants and stock grazing will be ceased within these areas to allow for natural regeneration. Overall, the Project is consistent with Objective 2.
33.	B7.2.2 Policy (5)	Avoid adverse effects on areas listed in the Schedule 3 of Significant Ecological Areas – Terrestrial Schedule and Schedule 4 Significant Ecological Areas – Marine Schedule.	As with other provisions assessed above, the focus of this policy is on <i>areas</i> identified in Schedule 3. The following areas of scheduled SEAs are within or in proximity to the proposed Sutton Block LOQ: • SEA_T_5349 – Terrestrial • SEA_T_5323 – Terrestrial

	Reference	RPS Objective/Policy	Commentary
			SEA_T_1177 – Terrestrial Clearance of approximately 14.25 ha of vegetation from within SEA overlays (SEA_T_5323 and SEA_T_1177) is proposed. Approximately 7.58 ha of this removal will be from within the SPQZ. When reading the provisions for quarrying in conjunction with these policies, there is acknowledgement that loss of SEA is likely within the SPQZ zone. There is also a proportion of SEA T_5323 removal outside the SPQZ. As noted in Row 10, the Sutton Block was redesigned to avoid Kaarearea Paa (including SEA_T_5349 in its entirety), noting this meant a portion of the site zoned as SPQZ, became unable to be utilised for the quarry activities anticipated by the zone. As set out in Row 31, the SEA_T_5323 proposed for removal has been assessed as having low- moderate ecological value despite the SEA scheduling. The areas of SEA identified as having higher ecological value have been avoided. Where adverse effects cannot be avoided, they have been remedied and mitigated. Residual adverse effects on terrestrial ecology are proposed to be offset and compensated through a comprehensive ecological package designed to achieve a Net Gain. In addition, the proposed ecological package includes native planting within the existing SEA areas on site. This will ensure that the areas identified through this policy will be enhanced, rather than effects only being avoided. This approach is considered to be consistent with direction in the AUP for loss of natural values, particularly within the SPQZ. Further, the offset proposed will ensure that the loss of vegetation with the identified SEAs will not represent material harm. In addition, the proposed ecological package

	Reference	RPS Objective/Policy	Commentary
			includes native planting within the SEA areas to provide an improvement in ecological quality. On that basis, the Project is not inconsistent with or contrary to Policy 5.
34.	B7.2.2 Policy (5A)	Improve the resilience of areas listed in the Schedule 3 of Significant Ecological Areas – Terrestrial Schedule and of Schedule 4 Significant Ecological Areas – Marine Schedule to the effects of climate change.	As discussed in Technical Reports C and D, the offset package involves a range of ecological enhancement activities within the impact site and off-site to address residual adverse effects on ecology. Notably, the offset programme will over time provide a contiguous tract of forest between Kaarearea Paa SEA_T_5349 and wider SEA_T_5323 significantly improving the extent, quality and connectivity of local indigenous biodiversity and habitats on site. Over time, this will improve the resilience of these two SEA and the wider Hunua Ranges. While the Project does involve the removal of existing vegetation within areas of SEA, due to the enhancement planting and weed and pest control, overall the resilience of the areas will be improved. Accordingly, the Project is consistent with Policy (5A).
B7. Toitū te whenua, toitū te taiao – Natural resources B7.3. Freshwater systems			
35.	B7.3.1 Objective (1)	Degraded freshwater systems are enhanced.	There are a number of freshwater systems within the SAL Landholdings that are degraded from historic farming activity that has been undertaken on the site over the years. This has resulted in systems that have poor riparian vegetation, channel modification and low biodiversity values. The project will enhance the retained systems via riparian planting and stream enhancement of a total of 3,341 m lineal metres and 4.04 ha of wetland restoration (on-site and off-site). The project will enhance the retained degraded freshwater systems and is accordingly consistent with Objective 1.

	Reference	RPS Objective/Policy	Commentary
36.	B7.3.1 Objective (2)	Loss of freshwater systems is minimised.	The objective requires that the loss of freshwater systems be “minimised” rather than “avoided”. The development of the Sutton Block for quarrying, will result in the unavoidable loss of permanent and intermittent streams within the quarry footprint. There are a total of 9 un-named streams and tributaries within the development area and 14 areas of wetland, of which the majority of the freshwater systems are located within the SPQZ. Where possible the design has been modified to avoid loss of freshwater systems. For example, moving the pit further north from Kaarearea Paa, resulted in avoiding removal of 610 m of stream extent and 5,241 m² of wetland area and avoiding the adjoining freshwater catchment in the north-east of the pit. Acknowledging that there will be some loss of wetland systems, overall the loss has been “minimised” and therefore the Project is consistent with Objective 2.
37.	B7.3.1 Objective (3)	The adverse effects of changes in land use on freshwater are avoided, remedied or mitigated.	The Sutton Block development will involve land use changes, primarily from pastoral farming use to quarrying and aggregate extraction, resulting in loss of freshwater systems. In addition, there will be land use change with the conversion of some pastoral land to native revegetation. Where at all possible effects have been avoided, and where that is not possible mitigation and offset measures have been proposed and are encapsulated through proposed conditions of consent. The Project is therefore broadly consistent with Objective 3.
38.	B7.3.2 Policy (4)	<i>Management of freshwater systems</i>	The loss of freshwater systems has been minimised where possible through the redesign of the pit extent, which resulted in the reduction in wetland and stream loss while

	Reference	RPS Objective/Policy	Commentary
		(4) Avoid the permanent loss and significant modification or diversion of lakes, rivers, streams (excluding ephemeral streams), and wetlands and their margins, unless all of the following apply: (a) it is necessary to provide for: ... (iii) the sustainable use of land and resources to provide for growth and development; or (iv) infrastructure; (b) no practicable alternative exists; (c) mitigation measures are implemented to address the adverse effects arising from the loss in freshwater system functions and values; and (d) where adverse effects cannot be adequately mitigated, environmental benefits including on-site or off-site works are provided.	recognising that the nature of the activity and its locational constraints, has meant that complete avoidance of freshwater system loss is not able to be achieved. Where this has not been possible, the Project satisfies all elements of the exception in (a)-(e): (a) the project is necessary in order to provide aggregate material, which is an essential material used in various construction and civil engineering applications. Securing a future supply of high-quality aggregate is essential to delivering regionally significant infrastructure projects. Furthermore, it is a sustainable use of an in situ resource, which provides directly for growth and development; (b) for the reasons described above, alternative designs within the proposed site have been investigated, and it is considered that the proposed layout represents the best practicable alternative; (c) mitigation measures to address the adverse effects arising from the loss in freshwater system <i>functions</i> and <i>values</i> are set out in the REAR-SW (Technical Report D, Volume 2) (there is no requirement under this policy to mitigate the loss of <i>extent</i>); and (d) to the extent there are residual adverse effects existing after mitigation, environmental benefits including on-site or off-site works are provided as follows: • riparian planting around significant wetlands and watercourses both on site and off-site at the Tuakau offset site; • pest control within the SAL site and Tuakau offset site; • removal of barriers to fish passage; and • revegetation planting of pastoral land with native vegetation.

	Reference	RPS Objective/Policy	Commentary
			Although this particular policy does not require it, the stream and offset package will result in a 1:1 ratio of stream loss to gain, with the overall stream bed loss area to gain being 1:10. Accordingly, the programme of stream and wetland offset over time will result in a net gain. Overall, the Project is therefore consistent with Policy 4.
39.	B7.3.2 Policy (5)	Manage subdivision, use, development, including discharges and activities in the beds of lakes, rivers streams, and in wetlands, to do all of the following: (a) protect identified ... Natural Stream Management Areas, and Wetland Management Areas; (aa) ... (b) minimise erosion and modification of beds and banks of ... streams and wetlands; (c) limit the establishment of structures within the beds of lakes, rivers and streams and in wetlands to those that have a functional need or operational requirement to be located there; and (d) maintain or where appropriate enhance: (i) freshwater systems not protected under Policy B7.3.2(5)(a); (ii) navigation along rivers and public access to and along lakes, rivers and streams; (iii) existing riparian vegetation located on the margins of lakes, rivers, streams and wetlands; and (iv) areas of significant indigenous biodiversity.	The Sutton Block has been designed and will be operated in order to: • Avoid any development within NSMA and WMA (none are identified within the project footprint) (Policy 5(a)); • Minimise erosion and modification of the beds and banks of the streams within the site in accordance with GD05 (Policy 5(b)); • Structures within the beds of streams within the site have been avoided where possible, through alternative designs and layouts. One culvert is proposed to upgrade an existing culvert which is required to obtain access to the Sutton Block (Policy 5(c)). • The following have been maintained or enhanced (Policy 5(d)): ○ A range of freshwater systems outside of the quarry pit, including wetland and stream enhancement through riparian planting and the provision of fish passage, as described in Technical Report D, Volume 2. ○ Enhancement and pest control as described in Technical Report C, Volume 2. ○ Enhancement of existing rock forest on through transplanting of seedlings and planting and enhancement planting. ○ Areas of significant indigenous biodiversity have been identified on site, including areas

	Reference	RPS Objective/Policy	Commentary
			scheduled as SEAs in the AUP, including areas that will be protected in perpetuity. The project is consistent with Policy 5.
40.	B7.3.2 Policy (6)	Restore and enhance freshwater systems where practicable when development, change of land use, and subdivision occur.	Where practicable, freshwater systems have been restored and enhanced. In particular, riparian planting of degraded streams and wetland located on and offsite is proposed as set out in Row 39 above. The Project is consistent with Policy 6.
B7. Toitū te whenua, toitū te taiao – Natural resources B7.4. Coastal water, freshwater and geothermal water			
41.	B7.4.1 Objective (1)	Coastal water, freshwater and geothermal water are used within identified limits while safeguarding the life-supporting capacity and the natural, social and cultural values of the waters.	Groundwater take and diversion consent is sought to enable aggregate extraction. The Groundwater Assessment (Technical Report L) concludes there is sufficient availability of the groundwater resource in the Greywacke aquifer and the proposed take won't result in overallocation. Dewatering of the proposed Sutton Block has the potential to result in a reduction in stream baseflows in downstream areas where the regional groundwater systems intercept the streams. To mitigate the loss of stream base flows on NT-1, Maketu, Mangawheau and Hingaia Streams an augmentation programme is proposed from the Sutton Block pit pump or bores (refer to Schedule B of Technical Report L, Volume 2 and consent conditions). Freshwater monitoring will be undertaken prior to discharges occurring, and throughout the project, to establish an accurate baseline and monitor effects. The augmentation will be managed to ensure it won't result in an increase in temperature or dissolved oxygen. As mentioned in Row 22, the groundwater is from the same catchment or puna that naturally feeds the streams to help ensure that the mauri and wairua of the nga awa are maintained. The Project is therefore consistent Objective 1.

	Reference	RPS Objective/Policy	Commentary
42.	B7.4.1 Objective (2)	The quality of freshwater and coastal water is maintained where it is excellent or good and progressively improved over time where it is degraded.	The quality of freshwater will be maintained through the measures set out in Section 6 of the AEE, including: • Robust erosion and sediment control measures are set out in the ESCAR (Technical Report R) designed to manage potential sediment discharges during of construction of the quarry on downstream freshwater systems. • From Stage 2 onwards, all site water (groundwater and stormwater) will fall to the pit sump. From the pit, clean water will be pumped and discharged directly to stream 4 (NT1) and dirty water (water exceeding a turbidity limit of 100NTU) will be pumped and integrated into the Drury Quarry Water Management system and sent to the Lamella for processing prior to being discharged to the lower reaches of NT1 stream. • Freshwater monitoring prior to and during augmentation is required by the consent conditions to ensure water quality isn't affected by proposed augmentation. The Project is consistent with Objective 2.
43.	B7.4.1 Objective (4)	The adverse effects of point and non-point discharges, in particular stormwater runoff and wastewater discharges, on coastal waters, freshwater and geothermal water are minimised and existing adverse effects are progressively reduced.	Adverse effects of stormwater discharges on freshwater are addressed in Sections 6 and 9 of the AEE. Refer to Row 42, and effects will be minimised. No wastewater discharges are proposed. The Project is accordingly consistent with Objective 4.
44.	B7.4.1 Objective (6)	Mana Whenua values, mātauranga and tikanga associated with ... freshwater ... are recognised and provided for, including their traditional and cultural uses and values.	SAL has received a number of draft and final CVA reports. The CVAs identified values of significance to Mana Whenua, including in relation to freshwater. In response to the matters raised in the CVA's, Section 9.11.2 of the AEE sets out various measures proposed to minimise the effects of the project on the mauri and wairua of the awa (water ways), puna (springs) and warepo (wetlands) and provide for

	Reference	RPS Objective/Policy	Commentary
			Mana Whenua values. Conditions of consent are proposed offering opportunities for Mana Whenua to input into draft management plans and for copies of annual freshwater monitoring data to be provided. Refer to Row 18. Acknowledging that some freshwater systems are being lost and therefore the Mana Whenua values will be impacted in relation to these particular water courses, it is still considered that overall the Project is nonetheless consistent with Objective 6.
45.	B7.4.2 Policy (7)	<i>Water quality</i> Manage the discharges of contaminants into water from ... use and development to avoid where practicable, and otherwise minimise, all of the following: ... (b) adverse effects on the quality of freshwater and coastal water; (c) adverse effects from contaminants, ... and the potential for these to enter freshwater and coastal water from both point and non-point sources; (d) adverse effects on Mana Whenua values associated with ..., freshwater ..., including wāhi tapu, wāhi taonga and mahinga kai; and (e) adverse effects on the water quality of catchments and aquifers that provide water for domestic and municipal supply.	Management of discharges of contaminants is integral to the design and management of the proposed Sutton Block. This project gives effect to the requirements of this policy as follows: (a) significant bacterial contamination of freshwater will be avoided, with any particularly dirty water being directed through the existing Drury Quarry Water Management System, which includes a lamella; (b) adverse effects from the construction and operation of the quarry relate primarily to sediment discharges from earthworks and the augmentation of streams. The quarry is designed during both the construction and operation phase to capture these discharges and treat them, thereby avoiding or minimising effects (see ESCAR (Technical Report R, Volume 2). Prior to stream augmentation baseline water quality will be established and augmentation will be managed to ensure no significant change in water temperature or dissolved oxygen.; (c) refer (a) and (b) above; (d) refer to Row 19; and (e) there are not expected to be any effects of potable water used for domestic or municipal supply. The Project is consistent with Policy 7.

	Reference	RPS Objective/Policy	Commentary
46.	B7.4.2 Policy (8)	<i>Sediment runoff</i> Minimise the loss of sediment from subdivision, use and development, and manage the discharge of sediment into freshwater and coastal water, by: (a) promoting the use of soil conservation and management measures to retain soil and sediment on land; and (b) requiring land disturbing activities to use industry best practice and standards appropriate to the nature and scale of the land disturbing activity and the sensitivity of the receiving environment.	Land disturbing activities associated with the construction of the quarry will be managed using industry accepted practice, as set out in the ESCP for preliminary works phases and overburden removal and within the Quarry Management Plan (QMP) for on-going quarry operation phases. ESC measures proposed appropriately reflect the nature and scale of the earthworks and the sensitivity of the receiving environment. Once overburden removal is complete, and rock extraction activities commence, the risk of sediment runoff significantly decreases. The proposed approach reflects this. The Project will minimise the loss of sediment and will appropriately manage the discharge of sediment into freshwater and will therefore be consistent with Policy 8.
47.	B7.4.2 Policy (9)	<i>Stormwater management</i> Manage stormwater by all of the following: (a) requiring subdivision, use and development to: (i) minimise the generation and discharge of contaminants; and (ii) minimise adverse effects on freshwater and coastal water ...; (iii) (b) adopting the best practicable option for every stormwater diversion and discharge; and ...	Stormwater on site will be managed in a way (described in Technical Report R, Volume 2) that gives effect to the requirements of sub-policies (a) and (b): (a) Refer to Row 37 above. (b) the stormwater diversions and discharges will adopt the best practicable option to minimise the effects of discharges. The Project is consistent with Policy 9.
48.	B7.4.2 Policy (12)	Promote the efficient use of freshwater and geothermal water	The proposed groundwater take is to enable mineral extraction activities that will secure a significant volume of high-quality aggregate, a fundamental resource required to facilitate the delivery of infrastructure and development projects that provide significant regional benefits. Some of the groundwater will be reused for quarry-related activities (e.g., processing and dust suppression), as well as

	Reference	RPS Objective/Policy	Commentary
			augmenting streams. This is considered to be an efficient use of the water resource at this site.
49.	B7.4.2 Policy (13)	Promote the taking of groundwater rather than the taking of water from rivers and streams in areas where groundwater is available for allocation.	No surface water take is proposed. The proposed groundwater take is consistent with Policy 13.
50.	B7.4.2 Policy (14)	Enable the harvesting and storage of freshwater and rainwater to meet increasing demand for water and to manage water scarcity conditions, including those made worse by climate change	As set out in Section 6.4.2 of the AEE, the base of the pit will act as a storage pond. Some of the water will be reused for quarrying activities. The reuse of this collected water is consistent with Policy 14.
B7. Toitū te whenua, toitū te taiao – Natural resources			
B7.5. Air			
51.	B7.5.1 Objective (1)	The discharge of contaminants to air from use and development is managed to improve region-wide air quality, enhance amenity values in urban areas and to maintain air quality at appropriate levels in rural and coastal areas.	The SAL landholdings are primarily zoned SPQZ, with the surrounding area being rural zoning. The SPQZ is characterised as a low air quality environment under the AUP, and the rural zone areas are a medium air quality environment. As set out in the Air Quality Assessment (Technical Report K, Volume 2), the local ambient air is characterised by rural activities, existing quarry activities and discharges and the State Highway, which is located within close proximity of the SAL landholdings. The potential air quality effects are limited to the generation of dust emissions, namely amenity effects and potential human health effects associated with dust. A range of management measures are proposed to manage air quality effects, including, comprehensive going monitoring system, dust suppression, controlling vehicle speeds, minimise un-stabilised areas. A Dust Management Plan is required to be prepared as a condition of consent. Dust effects are expected to be internalised, as far as practicable, while recognising the need to allow for the efficient ongoing extraction of mineral resources. As set out

	Reference	RPS Objective/Policy	Commentary
			in Technical Report K, dust from the Sutton Block project is able to be contained on site. Dust mitigation measures are proposed to manage dust emission to be within 50 to 100 m of the source, resulting in a low likelihood of dust effects on nearby sensitive receptors. The potential human health effects of the proposed discharge have been assessed as low. Although the project is not actively improving air region-wide air quality. The Sutton Block will maintain the air quality at an appropriate level, which is specifically anticipated by the SPQZ. Overall, the Project is consistent with Objective 1.
52.	B7.5.1 Objective (3)	Avoid, remedy or mitigate adverse effects from discharges of contaminants to air for the purpose of protecting human health, property and the environment.	Due to the nature of quarrying activity, the potential air quality effects are limited to the generation of dust emissions and associated potential human health effects. With specific regard to health effects, effects from dust discharges are considered to be low for the following reasons: • PM₁₀ and particularly PM_{2.5} are generally not significant components of the dust generated from quarry activities; • Total cumulative concentrations of PM₁₀ are predicted to be well below the NESAQ assessment criteria (refer to Section 3.4.4 of the AEE); and • Proposed dust suppression will suppress PM₁₀. With regard to RCS, analysis undertaken by SAL indicates that the processed material produced contains a silica content of between 0.5 and 13 percent. Conservative screening calculations are included in the Air Quality Assessment (Technical Report K, Volume 2) to assess the potential for off-site RCS effects. Overall, the assessment considers that the predicted RCS concentrations are low and are unlikely to generate any offsite RCS effects.

	Reference	RPS Objective/Policy	Commentary
			The specific management measures proposed are described in Row 51 above. On this basis, the Project is consistent with Objective 3.
53.	B7.5.2 Policy (1)	Manage discharge of contaminants to air from use and development to: (a) avoid significant adverse effects on human health and reduce exposure to adverse air discharges; (b) control activities that use or discharge noxious or dangerous substances; (c) minimise reverse sensitivity effects by avoiding or mitigating potential land use conflict between activities that discharge to air and activities that are sensitive to air discharges; (d) protect activities that are sensitive to the adverse effects of air discharges; (e) protect flora and fauna from the adverse effects of air discharges; (f) enable the operation and development of infrastructure, industrial activities and rural production activities that discharge contaminants into air, by providing for low air quality amenity in appropriate locations.	Discharge of contaminants to air from the construction and operation of the Sutton Block will be managed as follows (refer to Technical Report K, Volume 2): (a) significant adverse effects on human health are not anticipated as discussed above in row 52; (b) the discharge of any dangerous substances in dust such as PM₁₀ and RCS will be controlled with dust management; (c)-(d) The nearest sensitive receptor to the LOQ footprint is located approximately 130 m away (359 MacWhinney Drive). With dust mitigation measures put in place (refer above and to Section 6.2.1 of the AEE), dust emissions will be minimised to within 50 to 100 m of the source, resulting in low likelihood of effects on any nearby sensitive receptors. (e) Dust disturbance is noted in Section 9.8.1 of the AEE as having an indirect effect on habitats and associated species primarily where the pit extent abuts areas of retained habitat. Section 6.4.1 of the AEE states that the dust suppression measures will help mitigate these indirect effects on the edges of adjacent vegetation that are not being removed. (f) Refer to Row 51 above. The Project gives effect to Policy 1.
B7. Toitū te whenua, toitū te taiao – Natural resources B7.6. Minerals			
54.	B7.6.1 Objective (1)	Auckland's mineral resources are effectively and efficiently utilised.	Drury Quarry currently supplies approximately 30% of the aggregate resource in Auckland and therefore is a significant contributor to Auckland achieving this policy. The Sutton Block expansion will enable consistency of aggregate supply

	Reference	RPS Objective/Policy	Commentary
			from a site located adjacent to the Drury Quarry pit, allowing the existing quarry plant and ancillary infrastructure to be utilised. Accordingly, the expansion is an efficient use of an existing well-equipped facility. The Sutton Block also enables more effective provision of aggregate being located in close proximity to projected future growth areas in South and East Auckland. Overall, the Sutton Block expansion is an effective and efficient use of an existing mineral extraction site and its ancillary infrastructure. The Project is strongly aligned with and achieves Objective 1.
55.	B7.6.2 Policy (1)	Provide for mineral extraction activities within appropriate areas to ensure a secure supply of extractable minerals for Auckland's continuing development.	The Sutton Block was zoned for Quarry purposes under the previous Papakura District Plan, demonstrating that the use of this area for quarrying activities has been anticipated for some time. The majority of the proposed 108 ha Sutton Block footprint (72%) is within the SPQZ. This is an appropriate area given the zone provides for significant mineral extraction activities. The Sutton Block also enables efficient and more cost-effective provision of aggregate for the development of the Auckland Region, being located in close proximity to projected future growth areas in South and East Auckland. Although the site is subject to a number of natural and cultural features, the Sutton Block has been designed to avoid, remedy or mitigate effects on these resources, and where that is not possible, to offset or compensate for them. The Project is strongly aligned with and achieves Policy 1.

	Reference	RPS Objective/Policy	Commentary
56.	B7.6.2 Policy (4)	Require mineral extraction activities to be established and operated in ways which avoid, remedy or mitigate significant adverse effects on the environment.	The Sutton Block has been designed to avoid, remedy or mitigate effects on natural and physical resources and where that is not possible to offset or compensate for them. Overall, the Project is consistent with Policy 4.
B9. Toitū te tuawhenua- Rural environment B9.2. Rural activities			
57.	B9.2.1 Objective (4)	Auckland's rural areas outside the Rural Urban Boundary and rural and coastal towns and villages are protected from inappropriate subdivision, urban use and development.	The Project is an appropriate use in this part of the Rural environment, immediately adjacent to a SPQZ.
58.	B9.2.2 Policy (1)	Enable a diverse range of activities while avoiding significant adverse effects on and urbanisation of rural areas, including within the coastal environment, and avoiding, remedying, or mitigating other adverse effects on rural character, amenity, landscape and biodiversity values.	The Sutton Block is considered an appropriate activity in this location (see row 56 above). In terms of landscape and character values, the LVA (Technical Report J, Volume 2) notes that the margins of the SPQZ and Rural Zones do not relate to a change in characteristics, and both areas remain influenced by the quarry activities to the south. The ONL, Kaarearea Paa, streams and wetlands have been avoided by the design of the Sutton Block as far as practicable. Adverse effects on rural character, amenity and landscape are avoided where practicable and where avoidance is not possible, mitigation measures are proposed to the greatest extent possible. Measures include a buffer planting in specified locations, construction of the northern bund and screening planting. Effects on biodiversity values will be avoided or mitigated, with residual effects being the subject to an extensive offset package (refer Technical Report E-H, Volume 2). The Project is consistent with Policy 1.
B9. Toitū te tuawhenua- Rural environment B9.3. Land with high productive potential			

	Reference	RPS Objective/Policy	Commentary
59.	B9.3.1 Objective (2)	Land containing prime soil is managed to enable its capability, flexibility and accessibility for primary production.	The location of the Sutton Block LOQ footprint entirely avoids areas of prime soils. The project is consistent with this objective.
60.	B9.3.1 Objective (3) B9.3.2 Policy (3)	The productive potential of land that does not contain elite or prime soil is recognised. Recognise the productive potential of land that does not contain elite or prime soil and encourage the continued use of this land for rural production.	The Sutton Block is located on non-arable (Class 6 soils). This land has slight to moderate limitations to pastoral use but is suitable for tree crops and/or forestry and in some case vineyards. While the productive potential of this soil is recognised, quarries are functionally constrained to locations where aggregate is naturally found in situ. Accordingly, it is unavoidable that some areas of non-elite or prime soils will be affected. Accordingly, the project is not contrary to this objective or policy.
B10. Ngā tūpono ki te taiao - Environmental risk B10.2. Natural hazards and climate change			
61.	B10.2.1 Objective (3)	New subdivision, use and development avoid the creation of new risks to people, property and infrastructure.	The quarry pit has been designed to respond to natural hazards, in particular, areas of seismic activity and floodplains. For example: • The ground investigations as set out in the Geotechnical Assessment (Technical Report Q, Volume 2) conclude that the proposed Sutton Block LOQ footprint is generally feasible from a geotechnical perspective. • Slope stability modelling, as set out in the Geotechnical Assessment, indicates areas of localised instability through overburden material of residual Waipapa Greywacke, WCM and residual South Auckland Volcanics. Accordingly, this will be managed through a range of measures, including implementation of trial batters, removal of overburden residual volcanics, as well as hydraulic and geotechnical monitoring. A Slope Stability Management Plan (SSMP), is proposed to incorporate these measures.

	Reference	RPS Objective/Policy	Commentary
			- Earthquakes pose a potential risk to quarry stability. Accordingly, the slope stability analysis accounts for seismic risk. To meet the target safety values across the site, the WCM batters are likely to be flattened back to increase stability. - Stormwater requirements have been provided for in accordance with GD01. Accordingly, the Project is not expected to create new risks to people, property or infrastructure, and the Project is consistent with Objective 3.
62.	B10.2.1 Objective (4)	The effects of climate change on natural hazards, including effects on sea level rise, over at least 100 years and on the frequency and severity of storm events, is recognised and provided for.	The Sutton Block is located inland and therefore, is not expected to be subject to natural hazards associated with sea level rise over the next 100 years. Storm events have been considered as part of the ESCAR (Technical Report R, Volume 2). The ESC plans for stage 1 have been appropriately sized for storm events in accordance with GD05. From Stage 2 onwards, all site water (groundwater and stormwater, including from storm events) will fall to the pit sump and be managed via the Drury Quarry Water Management System. See Row 42. The proposed Slope Stability Management Plan (SSMP) will also incorporate an annual review of stormwater control measures. Overall, the removal of the overland flow paths will be managed throughout the LOQ to help ensure the risk associated with storm events is not exacerbated. Therefore, to the extent the objective is relevant, the Project is consistent with Objective 4.
63.	B10.2.1 Objective (5)	The functions of natural systems, including floodplains, are protected from inappropriate subdivision, use and development.	Several Flood Plains are located within the site, generally following the position of the overland flow paths. Almost all of the affected floodplains are located within the SPQZ. As

	Reference	RPS Objective/Policy	Commentary
			noted in Row 58 the Sutton Block is considered an appropriate activity in this location as it achieves the purpose of the zone. Redirection of surface water flows will be into the pit and managed via the Drury Quarry Water Management System. Removal of these overland flow paths will not exacerbate flooding offsite. Stream augmentation is proposed to maintain stream-based flows. Wetlands and streams that are to be retained on site will be enhanced. The proposed use is not inappropriate in this location, and accordingly the Project is consistent with Objective 5.
64.	B10.2.1 Objective (6)	The conveyance function of overland flow paths is maintained.	Refer to Row 63.
65.	B10.2.2 Policy (4)	<i>Identification and risk assessment</i> Assess natural hazard risks: (a) using the best available and up-to-date hazard information; and (b) across a range of probabilities of occurrence appropriate to the hazard, including, at least, a 100-year timeframe for evaluating flooding and coastal hazards, including sea level rise in response to global warming.	The relevant natural hazard risks have been assessed using the best available and up-to-date hazard information, particularly as set out in the Geotechnical Assessment (Technical Report Q, Volume 2) and ESCAR (Technical Report R, Volume 2). There are no potential coastal hazards affecting the site. Refer to Row 63 and 64 with regard to flood hazard risks. The Project is consistent with Policy 4.
66.	B10.2.2 Policy (5)	<i>Identification and risk assessment</i> Manage subdivision, use and development of land subject to natural hazards based on all of the following: (a) the type and severity of potential events, including the occurrence natural hazard events in combination; (b) the vulnerability of the activity to adverse effects, including the health and safety of people and communities, the resilience of property to damage and the effects on the environment; and	A risk-based approach has been taken to development of this site primarily for slope stability and seismic risks (refer Rows 61 and 62 above). In particular: (a) the type and severity of potential natural hazards have been assessed; (b) the project has been designed to minimise potential impacts of natural hazards, including the development of management plans; (c) the cumulative (downstream) impact of locating the quarry within a known flood plain have been assessed and

	Reference	RPS Objective/Policy	Commentary
		(c) the cumulative effects of locating activities on land subject to natural hazards and the effects on other activities and resources.	determined to be less than minor (see Row 62 and 63 above). The Project is consistent with Policy 5.
67.	B10.2.2 Policy (7)	<i>Management approaches</i> Avoid or mitigate the effects of activities in areas subject to natural hazards, such as earthworks, changes to natural and built drainage systems, vegetation clearance and new or modified structures, so that the risks of natural hazards are not increased.	The quarry pit has been designed to respond to natural hazards, in particular, areas of seismic activity and floodplains (refer to row 61 above for further detail). Overall, the project is not expected to create new risks or increase existing risks associated with natural hazards.
68.	B10.2.2 Policy (10)	<i>Management approaches</i> Encourage redevelopment on land subject to natural hazards to reduce existing risks and ensure no new risks are created by using a range of measures such as any of the following: (a) the design and placement of buildings and structures; (b) managing activities to increase their resilience to hazard events; or (c) change of use to a less vulnerable activity.	The Project is consistent with Policy 10.
69.	B10.2.2 Policy (11)	<i>Role of natural systems</i> Strengthen natural systems such as flood plains, vegetation and riparian margins, beaches and sand dunes in preference to using hard protection structures.	As discussed in Row 36, the loss of some natural systems was unavoidable. However, the riparian margins of streams and wetlands to be retained on site will be enhanced which will assist with mitigating sedimentation effects. The proposed offset package involves the removal of fish passage barriers and enhancement of offsite streams and wetlands which will result in a number of positive effects, including reducing effects of flooding. The Project is overall consistent with Policy 11.
B10. Ngā tūpono ki te taiao - Environmental risk B10.4. Land – contaminated			

	Reference	RPS Objective/Policy	Commentary
70.	B10.4.1 Objective (1)	Human health and the quality of air, land and water resources are protected by the identification, management and remediation of land that is contaminated.	A PSI and DSI (Technical Report M and N, Volume 2) was undertaken to identify actual or potential sources of ground contamination within parts of the Sutton Block LOQ footprint. A large portion of the Sutton Block LOQ footprint has been assessed as non-HAIL areas. No fill was encountered across the Sutton Block LOQ footprint, with a majority of soil samples taken complying with the AUP definition of cleanfill. The PSI and DSI did identify a discrete area as contaminated near the existing farm dwelling, storage shed and shearing shed (refer to Figure 3.8 below and Figure 2 of Technical Report N, Volume 2). As detailed in Section 9.7 of the AEE, site management measures are proposed during the removal of overburden within and in proximity to these discrete areas. These measures are contained within the Contaminated Soils Management Plan (CSMP) and Remedial Action Plan (RAP) (if required) (Technical Report P, Volume 2). Implementation of the recommended management measures will ensure there is low risk to human health and the environment. On this basis, the Project is consistent with Objective 1.
71.	B10.4.2 Policy (3)	Manage or remediate land that is contaminated where: (a) the level of contamination renders the land unsuitable for its existing or proposed use; or (b) the discharge of contaminants from the land is generating or is likely to generate significant adverse effects on the environment; or (c) development or subdivision of land is proposed.	(a) Refer to Row 70. Only a discrete area has been identified as contaminated and therefore the site is considered suitable for its proposed use. (b) It is not considered that the discharge of contaminants from the land is generating or is likely to generate significant adverse effects on the environment. (c) Refer to row 70. The Project is consistent with Policy 3.

Table 2: AUP Chapter D Overlays: objectives and policies assessment

	Reference	Chapter D Objective/Policy	Commentary
	D9. Significant Ecological Areas Overlay [rcp/rp/dp]		
72.	D9.2 Objective (1)	Areas of significant indigenous biodiversity value in terrestrial, freshwater, and coastal marine areas are protected from the adverse effects of subdivision, use and development.	As discussed in Technical Report C & D, the Project will involve the removal of approximately 14.25 ha of SEA vegetation, both within and outside the SPQZ. The AUP seeks preserve as much native vegetation as possible, while also providing for clearance of vegetation (including SEA) where necessary to enable mineral extraction activities. The area of SEA proposed to be removed within the Rural Zones has been assessed as predominately consisting of low-quality vegetation that is heavily grazed and lacks native ground cover and understory. As part of the development of the proposal, <i>areas</i> of native vegetation have been avoided where possible, and enhanced through revegetation and additional planting. These areas are identified and described in Technical Reports A, C & D. Removal of the SEA vegetation will result in significant adverse effects on terrestrial ecosystems that were unable to be avoided due to the functional need of aggregate extraction. A key component of the project is the extensive ecological off-set package that involves 62 ha of revegetation, 108 hectares of native forest enhancement (pest control) designed to achieve a Net Gain in biodiversity values. The proposed revegetation planting will provide a contiguous tract of forest between Kaarearea Paa SEA_T_5349 and wider SEA_T_5323 significantly improving the extent, quality and connectivity of local indigenous biodiversity and habitats. Overall, the Project is broadly consistent with Objective 1.
73.	D9.2 Objective (2)	Indigenous biodiversity values of significant ecological areas are enhanced.	As noted in Row 72 above, 62 ha of planting is proposed as part of the on-site terrestrial offset. Specifically, part of this planting is proposed within the pasture area of the Kaarearea Paa, providing enhanced ecological connectivity across the site by connecting existing SEAs. Accordingly, the Project gives effect to Objective 2.

	Reference	Chapter D Objective/Policy	Commentary
74.	D9.2 Objective (3)	The relationship of Mana Whenua and their customs and traditions with indigenous vegetation and fauna is recognised and provided for.	Refer to row 28. As discussed in the draft and final CVAs and summarised in section 9.11 of the AEE, the project seeks to address issues of significance to Mana Whenua including by, providing a greater setback from Kaarearea Paa, revegetating current areas of pasture adjacent to the Paa and enhancing other nearby areas of native vegetation, and providing the opportunity for Mana Whenua to comment on draft ecological management plans. Accordingly, the Project is consistent with Objective 3.
75.	D9.3 Policy (1)	<i>Managing effects on significant ecological areas – terrestrial and marine</i> Manage the effects of activities on the indigenous biodiversity values of areas identified as significant ecological areas by: ... (b) avoiding other adverse effects as far as practicable, and where avoidance is not practicable, minimising adverse effects on the identified values; (c) remedying adverse effects on the identified values where they cannot be avoided; (d) mitigating adverse effects on the identified values where they cannot be avoided or remediated; and (e) considering the appropriateness of offsetting any residual adverse effects that are significant and where they have not been able to be mitigated, through protection, restoration and enhancement measures, having regard to Appendix 8 Biodiversity offsetting.	The management of effects on SEAs are outlined as follows: (b)-(e) As noted in Row 33, SEA_T_5323 is entirely avoided by the project. Only a small portion of SEA_T_5323 is proposed to be removed. Avoidance of all SEA is not practicable due to the nature and functional requirement of the Project. The Project's ecological advisers have worked through the mitigation hierarchy with avoidance and mitigation the first priorities, supplemented by an ecological enhancement package to manage residual effects on terrestrial ecology. The residual effects on terrestrial ecology are proposed to be offset through an ecological package designed to achieve a Net Gain. Accordingly, the Project is consistent with Policy 1.

76.	D9.3 Policy (2)	Adverse effects on indigenous biodiversity values in significant ecological areas that are required to be avoided, remedied, mitigated or offset may include, but are not limited to, any of the following: (a) fragmentation of, or a reduction in the size and extent of, indigenous ecosystems and the habitats of indigenous species; (b) fragmentation or disruption of connections between ecosystems or habitats; (c) changes which result in increased threats from pests on indigenous biodiversity and ecosystems; (d) loss of buffering of indigenous ecosystems; (e) loss of a rare or threatened individual, species population or habitat; (f) loss or degradation of originally rare ecosystems including wetlands, dune systems, lava forests, coastal forests; (g) a reduction in the abundance of individuals within a population, or natural diversity of indigenous vegetation and habitats of indigenous fauna; (h) loss of ecosystem services; (i) effects which contribute to a cumulative loss or degradation of habitats, species populations and ecosystems; (j) impacts on species or ecosystems that interact with other activities, or impacts that exacerbate or cause adverse effects in synergistic ways; (k) loss of, or damage to, ecological mosaics, sequences, processes, or integrity; (l) downstream effects on wetlands, rivers, streams, and lakes from hydrological changes further up the catchment; (m) a modification of the viability or value of indigenous vegetation and habitats of indigenous fauna as a result of the use or development of other land, freshwater, or coastal resources; (n) a reduction in the historical, cultural, and spiritual association held by Mana Whenua or the wider community; (o) the destruction of, or significant reduction in, educational, scientific, amenity, historical, cultural, landscape, or natural character values; (p) disturbance to indigenous fauna that is likely or known to increase threats, disturbance or pressures on indigenous fauna; or	Refer to row 75 the mitigation hierarchy has been applied to manage the effects on indigenous biodiversity in SEAs. As detailed in Section 7 of the AEE, there are several plans proposed as part of the ecological offset. Key measures proposed within the package that will address the matters listed in (a) – (q) include: • Plant pest management programme that as a minimum targets species that threaten forest regeneration, forest succession, and the regeneration of any retirement area. • Animal pest management programme that as a minimum targets exotic species that threaten indigenous fauna (pest predators), and forest regeneration (pest browsers). • Restoration planting of rock forest (uncommon ecosystem type). • Edge Effects Management Plan requiring buffer infill planting and fencing. • Buffering and connection of isolated rock forest fragments and areas of kanuka and podocarp broadleaved forest to improve connectivity with the wider Hunua Ranges. • Native Lizard, Bat, Avifauna, Freshwater Fauna Management Plans that set out management measures to avoid or minimise effects on fauna prior to and during construction. • Riparian and wetland planting plans to mitigate effects on freshwater environments through the proposed planting of riparian margins and wetlands • Augmentation of streamflow from the pit or bores is proposed to maintain stream base flows from hydrological changes from the upper catchment and dewatering activities. • Planting of Kaarearea Paa as requested by Mana Whenua.
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	Reference	Chapter D Objective/Policy	Commentary
		(q) increases in the extinction probability of a species.	
77.	D9.3 Policy (3)	Enhance indigenous biodiversity values in significant ecological areas through any of the following: (a) restoration, protection and enhancement of threatened ecosystems and habitats for rare or threatened indigenous species; (b) control, and where possible, eradication of plant and animal pests; (c) fencing of significant ecological areas to protect them from stock impacts; (d) legal protection of significant ecological areas through covenants or similar mechanisms; (e) development and implementation of management plans to address adverse effects; (f) re-vegetating areas using, where possible, indigenous species sourced from naturally growing plants in the vicinity with the same climactic and environmental conditions; or (g) providing for the role of Mana Whenua as kaitiaki and for the practical exercise of kaitiakitanga in restoring, protecting and enhancing areas.	In terms of this policy, the following is proposed: (a) The proposed planting has been designed to provide a contiguous tract of forest between Kaarearea Paa SEA_T_5349, SEA_T_5323 and SEA_T_1177 which will significantly enhance the extent, quality and connectivity of local indigenous biodiversity and habits of these SEA's and the wider Hunua Ranges. (b) The pest/predator and weed control will enhance the values of the SEAs on and adjacent to the site (refer to Technical Report D). (c) Fencing of SEA and all proposed planting areas to protect them from stock is proposed as part of the planting plan. (d) All restoration actions will be legally protected by way of covenant. (e) Refer to 76 above a suite of management plans are proposed to address adverse effects. (f) Use of indigenous species sourced from naturally growing plants in the vicinity with the same climactic and environmental conditions is proposed where practicable. (g) A consent condition is offered to provide the opportunity to Mana Whenua to develop a CMP to develop partnership protocols going forward. The Project is consistent with Policy 3.
78.	D9.3 Policy (8A)	<i>Significant Ecological Areas in the Special Purpose – Quarry Zone (Brookby and Drury Quarries only (excluding SEA_T_5349), which are shown in Figure E15.10.1 Brookby Quarry extent and Figure E15.10.2 Drury Quarry extent respectively).</i> Manage the removal of vegetation within significant ecological areas to provide for mineral extraction activities within a Special Purpose Quarry Zone (Brookby and Drury Quarries only (excluding SEA_T_5349)), provided that, any significant adverse effects: (a) from excavating minerals including removal of overburden are mitigated or offset; or	SEA_T_1177 is located entirely within the SPQZ and is proposed to be removed as part of the project. Avoidance of this SEA was not practicable due to its location and extent, and the policy anticipates the removal of vegetation in certain circumstances and subject to mitigation and offsetting being provided. Refer to rows 76 and 77. Overall, the Project is considered consistent with Policy 8A.

	Reference	Chapter D Objective/Policy	Commentary
		(b) from other mineral extraction activities not within (a) are first avoided, and, if avoidance is not practicable having regard to the need to operate a safe and efficient quarry, are remedied, mitigated or offset; while: promoting where practicable the implementation of mitigation or offset planting or other measures prior to any removal of vegetation; and (i) having regard to matters 1 (noting that the activities described in 8A(a) above are only required to mitigate or offset significant adverse effects), 2 (in respect to additionality), 3, 4 and 5 in Appendix 8 Biodiversity Offsetting, including taking account of the environmental benefits of undertaking actions in advance of any vegetation removal.	
D10. Outstanding Natural Features Overlay and Outstanding Natural Landscapes Overlay [rcp/dp]			
79.	D10.2 Objective (1)	Auckland's outstanding natural features and outstanding natural landscapes are protected from inappropriate subdivision, use, and development.	An Outstanding Natural Landscapes Overlay (ONL) (Area 60, Ponga Road) is located immediately north of Sutton Block LOQ footprint and the North Bund. This ONL is considered an important attribute of the SAL Landholdings due to its sequence of rolling ridges, stream corridors and native forest. The Sutton Block footprint has been designed to avoid encroachment into the ONL and Kaarearea Paa. Accordingly, the Project is consistent with Objective 1.
80.	D10.2 Objective (2)	The ancestral relationships of Mana Whenua with outstanding natural features and outstanding natural landscapes are recognised and provided for.	Although not identified as an ONL or ONF, Kaarearea Paa is a locally distinctive volcanic landform that rises above the existing quarry. As discussed in Rows 4-7, Kaarearea Paa is a wāhi tapu site. The proposal avoids Kaarearea Paa and is therefore consistent with Objective 2.
81.	D10.3 Policy (1)	Protect the physical and visual integrity of outstanding natural landscapes by: (a) avoiding the adverse effects of inappropriate subdivision, use and development on the natural characteristics and qualities that contribute to the values of the outstanding natural landscape;	As noted above, encroachment into the ONL is avoided by the Project. The LVA notes that the areas of SAL landholdings in close proximity to the ONL do not demonstrate or contribute to the noted attributes of the ONL. Further, the ONL has been mapped in the vicinity of two established quarries (Drury and Symonds Hill quarries) forming part of the local context of the

	Reference	Chapter D Objective/Policy	Commentary
		(b) maintaining the visual coherence and integrity of the outstanding natural landscape; (c) maintaining natural landforms, natural processes and vegetation areas and patterns; (d) maintaining the visual or physical qualities that make the landscape iconic or rare; and (e) maintaining high levels of naturalness in outstanding natural landscapes that are also identified as outstanding natural character or high natural character areas.	landscape. Indigenous planting is proposed in the pocket of pasture within the ONL as part of the ecological mitigation package. While it is acknowledged that pasture is a noted attribute, it is considered that establishing indigenous vegetation within this area will contribute to the natural values which underpin the outstanding qualities of this landscape. Taking the above into account, the LVA considers that the visual coherence and integrity of the ONL landscape will remain intact and any potential adverse effects on this feature will be Low. Accordingly, it is considered that the Project is consistent with Policy 1.
82.	D10.3 Policy (2)	Protect the physical and visual integrity of outstanding natural landscapes while taking into account the following matters: (a) the extent of anthropogenic changes to the natural elements, patterns, processes or characteristics and qualities; (b) the presence or absence of structures, buildings or infrastructure; (c) the temporary or permanent nature of any adverse effects; (d) the physical and visual integrity and the natural processes of the location; (e) the physical, visual and experiential values that contribute significantly to the natural landscape's values; (f) the location, scale and design of any proposed development; and (g) the functional or operational need of any proposed infrastructure to be located in the outstanding natural landscape area.	No buildings are proposed within proximity to the ONL. As detailed in Section 5.8 of the AEE, a mixture of exotic and native buffer planting is proposed within a small portion of the ONL and adjoining the ONL to reduce views of the pit. As noted in Row 90, the LVA considers that the proposed planting will contribute to the value of the ONL, and that the visual coherence and integrity of the ONL landscape will remain intact. Notably, Policy D10.3(5) and (7) enables use that enhances the values of ONLs. The proposed development of Sutton Block includes the enhancement of the existing ONL through planting as set out in the LVA assessment. This planting has the benefit of providing a buffer screen as well as enhancing the value of the ONL. Accordingly, it is considered that the Project is consistent with Policy 2, 5 and 7.
83.	D10.3 Policy (5)	Enable use and development that maintains or enhances the values or appreciation of an outstanding natural landscape or outstanding natural feature.	
84.	D10.3 Policy (7)	Encourage the restoration and enhancement of outstanding natural landscapes and outstanding natural features where practical, and where this is consistent with the values of the feature or area.	

	Reference	Chapter D Objective/Policy	Commentary
	D17. Historic Heritage Overlay [rcp/dp]		
85.	D17.2 Objective (1)	The protection, maintenance, restoration and conservation of scheduled historic heritage places is supported and enabled.	As noted in Rows 4-7, the Project avoids the Historic Heritage Overlay Extent of Place (693, Kaarearea Paa/Ballard’s Cone Pā site, R12_278) overlay located at the centre of the SAL landholdings and immediately south of the Sutton Block LOQ footprint. The Project will not result in the demolition or destruction of any known features scheduled within this overlay. The Historic Heritage Overlay Extent of Place falls within the restoration area that is proposed to be legally protected by way of covenant which will protect it from future development. Overall, it is considered that the Project is consistent with the Objectives 1, 2 and 13 and Policy 14.
86.	D17.2 Objective (2)	Scheduled historic heritage places are protected from inappropriate subdivision, use and development, including inappropriate modification, relocation, demolition or destruction.	
87.	D17.3 Policy (13)	<i>Demolition or destruction</i> Avoid the total or substantial demolition or destruction of features (including buildings, structures or archaeological sites) within scheduled historic heritage places where it will result in adverse effects (including cumulative adverse effects) on the overall significance of the scheduled historic heritage place to the extent that the place would no longer meet the significance thresholds for the category it has been scheduled.	
88.	D17.3 Policy (14)	Avoid the total or substantial demolition or destruction of: (a) the primary features of Category A* and Category B scheduled historic heritage places; (b) the non-primary features of Category A and A* scheduled historic heritage places; and contributing features within Historic Heritage Areas; unless: (i) the demolition or destruction is required to allow for significant public benefit that could not otherwise be achieved; and (ii) the significant public benefit outweighs the retention of the feature, or parts of the feature, or the place; or (iii) the demolition or destruction is necessary to remove a significant amount of damaged heritage fabric to ensure the conservation of the scheduled historic heritage place.	
	D21. Sites and Places of Significance to Mana Whenua Overlay [rcp/rp/dp]		
89.	D21.2. Objective (1)	The tangible and intangible values of scheduled sites and places of significance to Mana Whenua are protected and enhanced.	In terms of the protection and enhancement of Sites of Significance to Mana Whenua, the Project has been designed

	Reference	Chapter D Objective/Policy	Commentary
			to avoid Kaarearea Paa Site of Significance to Mana Whenua under Plan Change 102 (111, Kaarearea Paa). As noted in Rows 93-97, revegetation planting is also proposed as part of the on-site terrestrial offset. Specifically, part of this planting is proposed within the pasture area of the Site of Significance and is supported by Mana Whenua. This planting will provide enhanced ecological connectivity across the site, by connecting to existing areas of vegetation including SEA_T_5349 and SEA_T_5323. Kaarearea Paa will remain fenced off at the request of Mana Whenua with ongoing access for Mana Whenua to the Paa in accordance with health and safety requirements maintained. In addition to the methods above, a Cultural Management Plan is proposed to be prepared in collaboration with Mana Whenua, in part, to ensure cultural effects associated with works in proximity to these sites are adequately addressed throughout the life of the Project. Ongoing access to Mana Whenua to Kaarearea Paa will be maintained. Overall, it is considered that the Project is consistent with Objective 1.
90.	D21.2. Objective (2)	Scheduled sites and places of significance to Mana Whenua are protected from inappropriate subdivision, use and development, including inappropriate modification, demolition or destruction.	Kaarearea Paa, and all areas proposed to be planted as part of the offset package, are proposed to be protected in perpetuity from future development by way of covenants. The Project is consistent with Objective 2.
91.	D21.3. Policy (1)	Avoid the physical destruction in whole or in part of sites and places of significance during earthworks.	With regard to avoiding the Site of Significance to Mana Whenua, in response to concerns raised during consultation with Ngāti Tamaoho and Ngaati Te Ata Waiohū in 2023, SAL has redesigned the LOQ extent to avoid all scheduled wāhi tapu and taonga sites within the Project area. The LOQ footprint was moved further to the north from Kaarearea Paa, creating a 13 ha buffer between the edge of the LOQ extent
92.	D21.3. Policy (2)	Avoid significant adverse effects on the values and associations of Mana Whenua with sites and places of significance to them.	
93.	D21.3. Policy (3)	Require subdivision, use and development, where adverse effects on sites and places of significance cannot practicably be avoided, to remedy or mitigate those adverse effects by:	

	Reference	Chapter D Objective/Policy	Commentary
		(a) enhancing the values of the scheduled site or place of significance and the relationship of Mana Whenua with their tāonga, commensurate with the scale and nature of the proposal; (b) incorporating mātauranga, tikanga and Mana Whenua values, including spiritual values; (c) recognising and providing for the outcomes articulated by Mana Whenua through an assessment of environmental effects with Mana Whenua and within iwi planning documents; (d) demonstrating consideration of practicable alternative methods, locations or designs that would avoid or reduce the impact on the values of scheduled sites and places of significance to Mana Whenua; and (e) demonstrating consideration of practical mechanisms to maintain or enhance the ability to access and use the scheduled site or feature for karakia, monitoring, customary purposes and ahikā roa by Mana Whenua.	and the Historic Heritage Overlay extent associated with Kaarearea Paa. Since this time, the wider extent of Kaarearea Paa has been scheduled as a Site of Significance to Mana Whenua under Plan Change 102 (111, Kaarearea Paa) which has immediate legal effect. Accordingly, the Sutton Block LOQ extent continues to avoid this Site of Significance. The project is consistent with Policies 1, 2, 3, 5 and 10.
94.	D21.3. Policy (5)	Recognise that some activities may have such significant adverse effects on Mana Whenua values that they are culturally inappropriate when considering the nature of the scheduled site or place of significance and associated values.	
95.	D21.3 Policy (10)	Avoid where practicable the use of scheduled sites and places of significance to Mana Whenua for new infrastructure where this affects cultural values.	
96.	D21.3 Policy (11)	Require an assessment of environmental effects where proposed works may have adverse effects on the values associated with sites or places of significance to Mana Whenua.	Refer to Section 9.11 of the AEE for the assessment of effects on cultural values. Refer to Section 10 and Appendix F (Volume 1) of the AEE for commentary on consultation with Mana Whenua. Accordingly, the Project is consistent with Policy 11.

Table 3: AUP Chapter E Auckland-wide: objectives and policies assessment

	Reference	Chapter E Objective/Policy	Commentary
	E1. Water quality and integrated management [rp/rcp/dp]		
97.	E1.2 Objective (1)	Freshwater and sediment quality is maintained where it is excellent or good and progressively improved over time in degraded areas.	Discharges from the site may affect freshwater quality through increasing levels of sedimentation or change in water temperature of increase in dissolved oxygen from augmentation. The proposed ESC approach is based on minimising the area exposed to erosion at any given time, implementing best-practice ESC measures, staged establishment, progressive stabilisation and diverting as much of the works site as possible to the Drury Quarry water management system as the enabling works are completed. The proposed ESC methodology is consistent with the industry-leading approach that has appropriately minimised sediment discharges and downstream effects on multiple projects throughout the Auckland Region. Once operational, all dirty water will be treated prior to discharge to ensure water quality downstream of the site is maintained. Freshwater quality should be maintained as a result of proposed treatment devices, however, although all appropriate erosion and sediment control measures will be put in place, there may be some short degradation of water quality during the initial site establishment works. Surface water quality sampling is proposed prior to augmentation (to establish baseline data) and during augmentation. Conditions of consent are proposed to ensure the stream augmentation will not result in a water temperature increase of 3°C or more and a dissolved oxygen concentration of less than 6 milligrams per litre (after reasonable mixing) to maintain freshwater quality.

	Reference	Chapter E Objective/Policy	Commentary
			Planting of riparian margins and stock exclusion on and offsite will help to maintain, if not improve, the water quality of the streams and wetlands. Overall, the Project is not contrary to Objective 1.
98.	E1.2 Objective (2)	The mauri of freshwater is maintained or progressively improved over time to enable traditional and cultural use of this resource by Mana Whenua.	The Project will unavoidably result in a loss of mauri associated with the streams and wetlands that are required to be removed in order to access the aggregate underneath. However, when assessed at a broader scale, the intention is to maintain mauri by managing and mitigating sediment loading downstream and preventing the discharge of dirty groundwater prior to augmentation. Water quality monitoring is proposed as conditions of consent. Riparian planting of streams and wetlands is proposed on and offsite, along with stock exclusion. The stream in the immediate vicinity of Kaarearea Paa is proposed to be retained and will be planted and protected. Accordingly, and notwithstanding the loss of some streams and wetlands, the Project gives effect to Objective 2.
99.	E1.3 Policy (1)	<i>Freshwater quality and ecosystem health interim guidelines</i> Manage discharges, until such time as objectives and limits are established in accordance with Policy E1.3(7), having regard to: (a) the National Policy Statement for Freshwater Management National Bottom Lines; (b) the Macroinvertebrate Community Index as a guideline for freshwater ecosystem health associated with different land uses within catchments in accordance with Policy E1.3(2); or (c) other indicators of water quality and ecosystem health.	Discharges that may affect freshwater quality and ecosystem health include erosion and sediment discharges, and stream augmentation. (a) A detailed assessment against the NPS-FM is provided in Table 11.1 of the AEE and overall the project is considered consistent with the NPS-FM. (b) Macroinvertebrates were sampled from each SEV reach instream habitat and biotic indices were calculated, including: the number of taxa,

	Reference	Chapter E Objective/Policy	Commentary
			• Ephemeroptera, Plecoptera and Trichoptera (EPT) richness, • Macroinvertebrate Community Index (MCI), and • Sem-Quantitative Macroinvertebrate Community Index (SQMCI). The exact methodologies used to determine the freshwater values and the associated assessment of effects are detailed in the Assessment of Ecological Effects (Technical Report A, Volume 2). (c) Spot measurements of basic water quality parameters were collected using a calibrated Yellow-Springs Instrument (YSI) alongside SEV surveys. Basic water quality parameters taken included temperature, dissolved oxygen concentration and saturation, and conductivity. Further water quality monitoring is proposed as condition of consent. The Project manages the discharges from the site and is consistent with Policy 1.
100.	E1.3 Policy (2)	<i>Freshwater quality and ecosystem health interim guidelines</i> Manage discharges, subdivision, use, and development that affect freshwater systems to: (a) maintain or enhance water quality, flows, stream channels and their margins and other freshwater values, where the current condition is above National Policy Statement for Freshwater Management National Bottom Lines and the relevant Macroinvertebrate Community Index guideline in Table E1.3.1 below; or (b) enhance water quality, flows, stream channels and their margins and other freshwater values where the current condition is below national bottom lines or the relevant Macroinvertebrate Community Index guideline in Table E1.3.1 below.	This policy applies to stream channels that will remain at the completion of the project construction and requires either maintenance or enhancement of these channels according to their MCI rating. The freshwater systems will be managed in accordance with (a) or (b), as described in the REAR-SW (Technical Report D, Volume 2). In relation to the remaining streams on site post construction, the Project will be consistent with Policy 2.

	Reference	Chapter E Objective/Policy	Commentary										
		Table E1.3.1 Macroinvertebrate Community Index guideline for Auckland rivers and streams <table><tr><th>Land use</th><th>Macroinvertebrate Community Index guideline</th></tr><tr><td>Native forest</td><td>123</td></tr><tr><td>Exotic forest</td><td>111</td></tr><tr><td>Rural areas</td><td>94</td></tr><tr><td>Urban areas</td><td>68</td></tr></table>	Land use	Macroinvertebrate Community Index guideline	Native forest	123	Exotic forest	111	Rural areas	94	Urban areas	68	
Land use	Macroinvertebrate Community Index guideline												
Native forest	123												
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101.	E1.3 Policy (3)	<i>Freshwater quality and ecosystem health interim guidelines</i> Require freshwater systems to be enhanced unless existing intensive land use and development has irreversibly modified them such that it practicably precludes enhancement.	The ecological offset package involves the restoration and enhancement of the degraded aquatic habitats (onsite and off-site). This will provide for a positive aquatic ecological benefit resulting in an overall net gain, with habitat creation, biodiversity gains, restoration of connectivity to existing habitats and overall restoration of habitats over extensive areas of both catchments. In respect of the freshwater systems remaining on the Site, the Project is consistent with Policy 3.										
102.	E1.3 Policy (4)	<i>National Policy Statement on Freshwater Management</i> When considering any application for a discharge, the Council must have regard to the following matters: (a) the extent to which the discharge would avoid contamination that will have an adverse effect on the life-supporting capacity of freshwater including on any ecosystem associated with freshwater; and (b) the extent to which it is feasible and dependable that any more than a minor adverse effect on freshwater, and on any ecosystem associated with freshwater, resulting from the discharge would be avoided.	In relation to Policy 4(a), the AEE and Technical Reports L and R have described how discharges from the site will be managed to avoid contamination that will have an adverse effect on the life-supporting capacity of freshwater. Refer to Row 98. The AEE and Technical Reports L and R have described the management measures to be put in place so that there will be no more than minor effect on freshwater from any discharges, and accordingly Policy 4(b) does not apply. The Project therefore satisfies Policy 4.										

	Reference	Chapter E Objective/Policy	Commentary
103.	E1.3 Policy (5)	<i>National Policy Statement on Freshwater Management</i> When considering any application for a discharge the Council must have regard to the following matters: (a) the extent to which the discharge would avoid contamination that will have an adverse effect on the health of people and communities as affected by their secondary contact with fresh water; and (b) the extent to which it is feasible and dependable that any more than minor adverse effect on the health of people and communities as affected by their secondary contact with fresh water resulting from the discharge would be avoided.	No discharges are proposed that have the potential to cause an effect on the health of people and communities. Therefore, the Project is consistent with Policy 5.
104.	E1.3 Policy (8)	<i>Stormwater management</i> Avoid as far as practicable, or otherwise minimise or mitigate, adverse effects of stormwater runoff from greenfield development on freshwater systems, freshwater and coastal water by: (a) taking an integrated stormwater management approach (refer to Policy E1.3.10); (b) minimising the generation and discharge of contaminants, particularly from high contaminant generating car parks and high use roads and into sensitive receiving environments; (c) minimising or mitigating changes in hydrology, including loss of infiltration, to: (i) minimise erosion and associated effects on stream health and values; (ii) maintain stream baseflows; and (iii) support groundwater recharge; (d) where practicable, minimising or mitigating the effects on freshwater systems arising from changes in water temperature caused by stormwater discharges; and ...	Adverse effects of stormwater runoff will be avoided as far as practicable, and otherwise minimised or mitigated, by: (a) site-specific ESC measures to be put in place during Stage 1 enabling works (bulk earthworks phase of the project (Technical Report R). From Stage 2 onwards, all site water (groundwater and stormwater) will fall to the pit sump and be managed via the Drury Quarry Water Management System. See Row 40. (b) the discharge of contaminants into sensitive receiving environments will be minimised primarily through the measures detailed in (a) above. No car parts or high use roads are proposed as part of this project. (c) Refer to the Technical Report L and Row 98 above. (d) Refer to Row 98 above. Overall, the Project is consistent with Policy 8.

	Reference	Chapter E Objective/Policy	Commentary
105.	E1.3 Policy (11)	Avoid as far as practicable, or otherwise minimise or mitigate adverse effects of stormwater diversions and discharges, having particular regard to: (a) the nature, quality, volume and peak flow of the stormwater runoff; (b) the sensitivity of freshwater systems and coastal waters, including the Hauraki Gulf Marine Park; (c) the potential for the diversion and discharge to create or exacerbate flood risks; (d) options to manage stormwater on-site or the use of communal stormwater management measures; (e) practical limitations in respect of the measures that can be applied; and (f) the current state of receiving environments.	Refer to Rows 89 and 97 above. The Project is consistent with Policy 11.
106.	E1.3 Policy (13)	Require stormwater quality or flow management to be achieved on-site unless there is a downstream communal device or facility designed to cater for the site's stormwater runoff.	As discussed in the Technical Report R all stormwater is to be collected and treated within the site prior to being discharged into the environment. The Project is therefore consistent with Policy 13.
107.	E1.3 Policy (26)	<i>Other discharges</i> Prevent or minimise the adverse effects from construction, maintenance, investigation and other activities on the quality of freshwater and coastal water by: (a) adopting best management practices and establishing minimum standards for the discharges; or (b) where Policy E1.3(26)(a) is not practicable, have regard to the following: (i) the nature, volume and concentration of the contaminants in the discharge; (ii) the sensitivity of the receiving environment to the contaminants in the discharge;	The effects of other discharges on freshwater will be managed through site ESC measures (to be described in the ESCP) including, procedures as outlined including use of silt fences, sediment retention ponds, decanting earth bunds, and a regime of maintenance and inspection of stormwater treatment devices. The Project is consistent with Policy 26.

	Reference	Chapter E Objective/Policy	Commentary
		(iii) other practicable options for the discharge, including reuse or discharge to the trade sewer; and (iv) practicable measures to reduce contaminant concentrations prior to discharge or otherwise mitigate adverse effects.	
	E2. Water allocation and use [rp]		
108.	E2.2 Objective (1)	Water in surface rivers and groundwater aquifers is available for use provided the natural values of water are maintained and established limits are not exceeded.	Refer to Row 41. There is sufficient availability of the groundwater resource in the Greywacke aquifer and the proposed take will not result in overallocation. The proposed take is not from a high use or vulnerable aquifer as defined by Auckland Council's Groundwater Management Areas. There are 22 farm wells in the Greywacke within the maximum zone of influence for the worst-case scenario Stage 4 dewatering stage or drawdowns. Based on the Auckland Council groundwater database, all bores within the maximum zone of influence (across all dewatering stages, including worse-case scenario dewatering Stage 4) are deeper than the predicted drawdowns and are likely to accommodate the drawdowns without any reduction in yield. Augmentation is proposed to mitigate drawdown on stream base flows. A Groundwater Monitoring Plan is proposed which requires ongoing monitoring of bores, set out trigger levels and management measures if nearby uses do experience drawdowns. Overall, the Project is consistent with Objective 1.
109.	E2.2 Objective (2)	Water resources are managed within limits to meet current and future water needs for social, cultural and economic purposes.	Refer to Row 48. The Project is consistent with Objective 2.
110.	E2.2 Objective (4)	Water resources are managed to maximise the efficient allocation and efficient use of available water.	Refer to Row 48. The Project is consistent with Objective 4.

	Reference	Chapter E Objective/Policy	Commentary
111.	E2.2 Objective (5)	Mana Whenua values, including the mauri of water, are acknowledged in the allocation and use of water.	Refer to Row 21 and Section 9.11 of the AEE. In summary, key measures taken into account as part of the Project to respond to Mana Whenua values associated with the allocation and use of water include: • The proposed stream augmentation regime will ensure no decrease in stream base flows. • Augmentation is proposed from the same groundwater catchment and puna that currently sustains the surface water flow of the streams, helping to preserve the mauri and wairua of ngā awa. • Groundwater drawdowns won't result in drawdowns on shallow groundwater or the lava flows below Kaarearea Paa. Accordingly, the Project gives effect to Objective 5.
112.	E2.3 Policy (4)	<i>Efficient allocation and use</i> Promote the efficient allocation and use of freshwater and geothermal water by: (a) requiring the amount of water taken and used to be reasonable and justifiable with regard to the intended use, and where appropriate: (i) municipal water supplies are supported by a water management plan; (ii) industrial and irrigation supplies implement best practice, in respect of the efficient use of water for that particular activity or industry; or (iii) all takes (other than municipal water supplies from a dam) are limited to a maximum annual allocation based on estimated water requirements; (b) requiring consideration of water conservation and thermal efficiency methods;	In response to E2.3 Policy (4), the amount to be taken is reasonable and justifiable and will have only minor effects on the aquifer's resource. Some of the groundwater and surface water will be reused for quarry-related activities (e.g., processing and dust suppression), as well as augmenting streams. This is considered to be an efficient use of the water resource at this site. The proposed use of the water is consistent with Policy 4.

	Reference	Chapter E Objective/Policy	Commentary
		(c) facilitating the transfer of surface water take permits, provided the transfer is within the same surface water catchment and does not result in site-specific adverse effects; (d) encouraging the shared use and management of water through water user groups or other arrangements where it results in an increased efficiency in the use and allocation of water; and (e) providing for storage and harvesting of fresh water.	
113.	E2.3 Policy (5)	<i>Water allocation and availability guidelines</i> Manage the taking and use of surface water from rivers, streams and springs and taking and use of groundwater from aquifers to meet all of the following except where water allocation exceeds or is close to exceeding the guidelines (refer to Policy E2.3(10)): (a) the minimum flow and availability guidelines in Table 1 River and stream minimum flow and availability in Appendix 2 River and stream minimum flow and availability are not exceeded; and (b) the aquifer availability and groundwater levels in Table 1 Aquifer water availabilities and Table 2 Interim aquifer groundwater levels in Appendix 3 Aquifer water availabilities and levels are not exceeded.	Refer to Row 119. Overall, the groundwater take will have a minor effect on aquifer resources and freshwater systems following implementation of the proposed mitigation measures. The proposed groundwater take is consistent with Policy 5.
114.	E2.3 Policy (7)	<i>Take and use of water</i> Require all proposals to take and use groundwater from any aquifer to demonstrate that: a) the taking is within the water availabilities and levels for the aquifer in Table 1 Aquifer water availabilities and Table 2 Interim aquifer groundwater levels in Appendix 3 Aquifer water availabilities and levels, except in accordance with Policy E2.3(11), and meeting all of the following: (i) recharge to other aquifers is maintained. (ii) aquifer consolidation and surface subsidence is avoided.	In response to E2.3 Policy (7): (a) the proposed take is within water availabilities and levels, and will maintain recharge to other aquifers and avoids aquifer consolidation and surface subsidence. (b) As noted in Row 35 and 109 above, the proposed augmentation regime will mitigate adverse effects on freshwater systems by offsetting the loss of stream base flows. Future monitoring of stream flows and quality are proposed as consent conditions.

	Reference	Chapter E Objective/Policy	Commentary
		b) the taking will avoid, remedy or mitigate adverse effects on surface water flows, including the following: (i) base flow of rivers, streams and springs. (ii) any river or stream flow requirements and in particular the minimum stream flow and availability in Appendix 2 River and stream minimum flow and availability. c) the taking will avoid, remedy or mitigate adverse effects on terrestrial and freshwater ecosystem habitat. d) the taking will not cause saltwater intrusion or any other contamination. e) the taking will not cause adverse interference effects on neighbouring bores to the extent their owners are prevented from exercising their lawfully established water takes. f) Policy E2.3(7)(e) above will not apply in the following circumstances: (i) where it is practicably possible to locate the pump intake at a greater depth within the affected bore; or (ii) where it can be demonstrated that the affected bore accesses, or could access, groundwater at a deeper level within the same aquifer, if drilled or cased to a greater depth. g) the proposed bore is capable of extracting the quantity of groundwater applied for; and h) the proposal avoids, remedies or mitigates any ground settlement that may cause distress, including reducing the ability of an existing building or structure to meet the relevant requirements of the Building Act 2004 or the New Zealand Building Code, to any existing: (i) buildings; (ii) structures; or	(c) Refer to Section 9.5.8 of the AEE, the proposed potential adverse effects of the augmentation regime of freshwater habitats are considered no more than minor. (d) No saltwater intrusion is anticipated due to the proposed take being from deep regional aquifer and because of the distance from the location of take to the coast. (e) The taking is unlikely to have any drawdown effects on neighbouring groundwater users. Refer to Row 109. (f) If ongoing monitoring demonstrates drawdown effects on neighbouring groundwater users, a range of mitigation measures will be proposed in the Groundwater Contingency Plan. (g) Extraction is not proposed via a bore. Rather the take and diversion will be from groundwater inflow from the base of the quarry pit. (h) The proposed take will not result in ground settlement. Accordingly, the take and use is consistent with Policy 7.

	Reference	Chapter E Objective/Policy	Commentary
		(iii) services including roads, pavements, power, gas, electricity, water and wastewater networks and fibre-optic cables.	
115.	E2.3 Policy (8)	Consider mitigation options, where there are significant adverse effects on the matters identified in policies E2.3(6) and (7) above, including any of the following: (a) consideration of alternative locations, rates and timing of takes for both surface water and groundwater; (b) use of alternative water supplies; (c) use of water conservation methods when water shortage conditions apply; (d) provision for fish passage in rivers and streams; (e) wetland creation or enhancement of existing wetlands; (f) riparian planting; or (g) consideration of alternative designs for groundwater dewatering proposals.	There are no significant adverse effects identified in relation to the proposal to take and use groundwater. Therefore, the proposed take is consistent with Policy 8.
116.	E2.3 Policy (9)	Require proposals to take and use surface water and groundwater to monitor the effects of the take on the quality and quantity of the water resource and to: (a) measure and record water use and rate of take; (b) measure and record water flows and levels; (c) sample and assess water quality and freshwater ecology; (d) measure and record the movement of ground, buildings and other structures; and (e) monitoring should be of a type and scale appropriate for the activity.	Groundwater Monitoring Plan and freshwater monitoring is proposed as consent conditions (Appendix I). These conditions require the Consent Holder to: (a) Measure and record water use and rate of take. (b) Measure and record surface water flows and levels at specified stream locations. (c) Undertake surface water quality sampling to establish baseline data prior to and during augmentation. (d) A Slope Stability Plan is proposed to monitor and measure safety and stability risks associated with the project. (e) Proposed monitoring regime is considered to appropriately reflect the type and scale of the proposed take and use. Overall, the take and use are consistent with Policy 9.

	Reference	Chapter E Objective/Policy	Commentary
117.	E2.3 Policy (13)	<i>National Policy Statement for Freshwater Management 2014</i> When considering any application the Council must have regard to the following matters: (a) the extent to which the change would adversely affect safeguarding the life supporting capacity of fresh water and of any associated ecosystem; and (b) the extent to which it is feasible and dependable that any adverse effect on the life-supporting capacity of freshwater and of any associated ecosystem resulting from the change would be avoided.	The NPS-FW 2014 is now outdated, and an assessment against the NPS-FW 2020 is set out in Table 12.1 of the AEE. As set out in Row 98 a range of management and mitigation measures are proposed to safeguard the life-supporting capacity of fresh water and associated ecosystems. It is considered that, with these in place, the proposed works will not adversely affect the life-supporting capacity of freshwater. The Project is consistent with Policy 13.
118.	E2.3 Policy (18)	<i>Damming of surface water</i> Encourage the off-stream damming of water in preference to the damming of rivers or streams.	In order to complete the construction of the access road, temporary damming of Stream 4 is required as described in Stage 2C of the ESCP. Temporary online and offline dams are proposed as part of these enabling works. Where possible stream diversions and dams will be undertaken 'offline'. However, due to the terrain and location of this particular aspect of works, it is not possible to do all works offline. The Project is not contrary to Policy 18.
119.	E2.3 Policy (21)	Require proposals for new, change or replacement applications to dam a river or stream or dam water with an off-stream dam to undertake monitoring of a type and scale appropriate for the activity and its effects, including: (a) inspection of dam embankments and spillways; (b) measurement and recording of embankment internal water levels and pressures; (c) sampling and assessment of water quality and freshwater biota in on-stream dams; and (d) variable flows below on-stream dams where required.	To the extent these matters are required to be undertaken in respect of temporary stream dams associated with the stream diversion works (as opposed to substantial dams) the proposed works will comply with Policy 21. Refer to Technical Report R.
120.	E2.3 Policy (22)	<i>Surface water diversions</i>	There will be some surface water diversions in order to reduce erosion and generation of sediment. This will be

	Reference	Chapter E Objective/Policy	Commentary
		Require proposals to divert surface water to demonstrate the diversion will to the extent practicable avoid significant adverse effects and remedy or mitigate other adverse effects including where relevant, effects on: (a) existing lawfully established surface water takes including those allowed by section 14(3)(b) of the Resource Management Act 1991; (b) existing buildings, structures and services; (c) existing flood hazard risks; (d) river bank stability; (e) scheduled historic heritage places or scheduled sites and places of significance to Mana Whenua; (f) people and communities; and (g) the life supporting capacity of freshwater, ecosystem processes, and indigenous species and their ecosystems.	undertaken in accordance with an approved ESCP, and to the extent that Policy 22 applies to such diversions then those matters will be addressed in the plan. The proposed surface water diversions are consistent with Policy 22.
121.	E2.3 Policy (23)	<i>Diversion of groundwater</i> Require proposals to divert groundwater, in addition to the matters addressed in Policy E2.3(6) and (7) above, to ensure that: (a) the proposal avoids, remedies or mitigates any adverse effects on: (i) scheduled historic heritage places and scheduled sites and places of significance to Mana Whenua; and (ii) people and communities. (b) the groundwater diversion does not cause or exacerbate any flooding; (c) monitoring has been incorporated where appropriate, including: (i) measurement and recording of water levels and pressures; and	The excavation of the pit will result in the diversion of groundwater. The effects of the diversion are described in Technical Report L and are considered to be less than minor. The Project is consistent with Policy 23.

	Reference	Chapter E Objective/Policy	Commentary
		(ii) measurement and recording of the movement of ground, buildings and other structures. (d) mitigation has been incorporated where appropriate including: (i) minimising the period where the excavation is open/unsealed; (ii) use of low permeability perimeter walls and floors; (iii) use of temporary and permanent systems to retain the excavation; or (iv) re-injection of water to maintain groundwater pressures.	
122.	E2.3 Policy (25)	<i>Quarrying</i> Enable regionally significant mineral extraction activities (extraction within groundwater and dewatering) provided that significant adverse effects are managed through considering all of the relevant policies in this section.	As discussed in Rows 99 - 115, all significant adverse effects associated with the proposed groundwater take, use and diversion will be managed so that adverse effects are minor. The groundwater and diversion is necessary to be able to undertake mineral extraction activities. The proposed Sutton Block will secure 240 MT of high-quality aggregate to facilitate the construction of regionally significant infrastructure projects. Therefore, the Project directly gives effect to Policy 25.
E3. Lakes, rivers, streams and wetlands [rp]			
123.	E3.2 Objective (1)	Auckland's lakes, rivers, streams and wetlands with high natural values are protected from degradation and permanent loss.	None of the streams or wetlands proposed to be removed are assessed as having High ecological value. Four of the streams have Moderate value and the other five have Very Low or Low overall ecological value. None of the affected streams are within any Natural Stream Management Areas. Two of the 14 wetlands are Moderate Ecological value while the remaining have Low ecological values. None of the wetlands are within any Wetland Management Areas. The values of each water system have been identified within Technical Report A.

	Reference	Chapter E Objective/Policy	Commentary
			Accordingly, the Project is consistent with Objective 1.
124.	E3.2 Objective (2)	Auckland's lakes, rivers, streams and wetlands are restored, maintained or enhanced.	While the Project involves the permanent loss of a number of streams and wetlands within the landholding, this loss has been minimised as far as practicable. In addition, revegetation of stream and wetland margins will be undertaken and the creation of 4.04 ha of new wetland habitat at the Tuakau site. These improvements will result in positive benefits to the retained streams and wetlands located on the site and at the offset site. These other enhancements and restoration proposals are consistent with Objective 2.
125.	E3.2 Objective (3)	Significant residual adverse effects on lakes, rivers, streams or wetlands that cannot be avoided, remedied or mitigated are offset where this will promote the purpose of the Resource Management Act 1991.	A significant ecological offset package is proposed to address residual effects on freshwater and will result in an overall Net Gain (Technical Reports D). This offsetting will, in the circumstances of the Project, promote the purpose of the Resource Management Act, as well as other RPS and other subordinate provisions that support and enable the extraction of aggregate. Therefore, the Project is consistent with Objective 3.
126.	E3.2 Objective (4)	Structures in, on, under or over the bed of a lake, river, stream or wetland are provided for where there are functional or operational needs for the structure to be in that location, or traverse that area.	Realignment of Stream 4 is required to create a new permanent stream diversion, which requires the construction of a permanent culvert. Alternative access routes were considered as part of the pit design and were discounted to reduce stream and wetland reclamation and avoid Kaarearea Paa. There is a functional need to access the Sutton Block site in this location to be able to expand the Drury Quarry into the Sutton Block and extract the aggregate resource where it is located in situ. The location of the proposed access is located with the SPQZ.

	Reference	Chapter E Objective/Policy	Commentary
			Overall, the Project is consistent with Objective 4.
127.	E3.2 Objective (5)	Activities in, on, under or over the bed of a lake, river, stream and wetland are managed to minimise adverse effects on the lake, river, stream or wetland.	Other than the reclamation of streams and wetlands and the proposed culvert and associated stream diversion described above, no other activities in the beds of streams or wetlands other than restoration works are proposed. The Project is consistent with Objective 5.
128.	E3.2 Objective (6)	Reclamation and drainage of the bed of a lake, river, stream and wetland is avoided, unless there is no practicable alternative.	Refer to Row 125 above. Mineral extraction activities have a functional need to be undertaken where aggregate is located in situ, such as within the Sutton Block. The majority of the site is zoned SPQZ and was also zoned for Quarry activities under the previous Papakura District Plan. The majority of the streams and wetlands proposed to be reclaimed are located within the centre of the proposed pit, making avoidance not practicable. The loss of freshwater systems has been minimised where possible in the design process, including through the redesign of the pit extent, which has resulted in the reduction in stream loss (610 m) and wetland extent (5,241 m ²), while recognising that the nature of the activity and its locational constraints, has meant that complete avoidance of freshwater system loss is not able to be achieved. Accordingly, the proposed reclamation of streams and wetlands is considered to meet the requirements of Objective 6.
129.	E3.2 Objective (7)	<i>Fish passage</i> The passage of fish is maintained, or is improved, by instream structures, except where it is desirable to prevent the passage of	Construction of the culvert discussed in Row 127 will be designed to maintain fish passage of climbing capable species (i.e., eels and banded kōkopu) only, due to the waterfall downstream of the Sutton Block works extent.

	Reference	Chapter E Objective/Policy	Commentary
		some fish species in order to protect desired fish species, their life stages, or their habitats.	Specifically, the waterfall acts as a significant natural barrier to fish passage, preventing swimming species such as īnanga from accessing the upper catchment. The culverts will also be designed and installed in accordance with the New Zealand Fish Passage Guidelines. As part of the offset package, enhance of fish passage through removal of fish barriers is proposed at the Tuakau Site thereby improving fish passage. The Project is consistent with Objective 7.
130.	E3.3 Policy (1)	<i>General</i> Avoid significant adverse effects, and avoid where practicable or otherwise remedy or mitigate other adverse effects of activities in, on, under or over the beds of lakes, rivers, streams or wetlands within the following overlays: (a) D4 Natural Stream Management Areas Overlay; (b) D5 Natural Lake Management Areas Overlay; (c) D6 Urban Lake Management Areas Overlay; (d) D9 Significant Ecological Areas Overlay; and (e) D8 Wetland Management Areas Overlay.	The Project has worked through the mitigation hierarchy with avoidance and mitigation the first priorities, supplemented by an ecological offset and enhancement package to manage residual effects on freshwater ecology. The residual effects on both freshwater and terrestrial ecology are designed to achieve a Net Gain. Refer to Rows 85 and 86 above. The proposed freshwater offsetting is located both within the broader Drury Quarry site and at the Tuakau site. Consideration against the principles to offsetting has been addressed in Technical Report D. Specifically, the offsetting is considered to be:
131.	E3.3 Policy (2)	Manage the effects of activities in, on, under or over the beds of lakes, rivers, streams or wetlands outside the overlays identified in Policy E3.3(1) by: (a) avoiding where practicable or otherwise remedying or mitigating any adverse effects on lakes, rivers, streams or wetlands; and (b) where appropriate, restoring and enhancing the lake, river, stream or wetland.	(a) The offset package consists of both onsite and offsite restoration and enhancement actions. As first priority, approximately 1,053 m of existing stream riparian planting within the wider SAL landholding is proposed. The remaining offset is proposed at the Tuakau offset site located approximately 16 km south of Drury. Sections 3.5.4 of Technical Report D explain the efforts by SAL to
132.	E3.3 Policy (3)	Enable the enhancement, maintenance and restoration of lakes, rivers, streams or wetlands	

	Reference	Chapter E Objective/Policy	Commentary
133.	E3.3 Policy (4)	Restoration and enhancement actions, which may form part of an offsetting proposal, for a specific activity should: (a) be located as close as possible to the subject site; (b) be 'like-for-like' in terms of the type of freshwater system affected; (c) preferably achieve no net loss or a net gain in the natural values including ecological function of lakes, rivers, streams or wetlands; and (d) consider the use of biodiversity offsetting as outlined in Appendix 8 Biodiversity offsetting. <i>Note 1</i> <i>When having regard to Policy E3.3(4) above, the following documents or any updated version of them should be referred to:</i> <i>Auckland Council Technical Report 2011/009: Stream Ecological Valuation (SEV): a method for assessing the ecological functions of Auckland Streams (October 2011) for guidance on how the location and extent of any offset may be calculated and assessed; and</i> <i>Guidance on Good Practice Biodiversity Offsetting in New Zealand, New Zealand Government et al, August 2014.</i> <i>Neither of these reference documents has precedence. An acceptable offsetting proposal may combine elements from both documents</i>	find a site located closer to the Sutton Block site and the reasons why Tuakau was selected as the preferred offset site. While the Tuakau Site discharges to the Waikato River, rather than west to the Manukau Harbour (Sutton Block), both waterbodies flow to the West Coast only separated by the Awhitu Peninsula. (b) As set out in Technical Report D, the primary ecological values of streams are associated with habitat provision for fauna. The majority of the impacted streams are intermittent, while the majority of the offset streams are permanent. While the type of streams proposed to be offset could be considered not 'like-for-like' for this reason, the ecological values of the streams being lost will be offset (if not more) through restoration of permanent streams as they are considered to provide greater habitat (in both extent and water quality) all year (opposed to intermittently). The values of the impacted wetlands at the Sutton Block and proposed offset site have been assessed as having the same ecological values and represent similar existing conditions. (c) The proposed offset package has been designed to achieve a net gain in natural values of streams and wetlands. (d) Appendix 8 Biodiversity offsetting has been applied refer to Section 3.2 of Technical Report D. Accordingly, the Project is broadly consistent with Policies 1-4.
134.	E3.3 Policy (5)	Avoid significant adverse effects, and avoid, remedy or mitigate other adverse effects of activities in, on, under or over the beds of lakes, rivers, streams or wetlands on:	Total avoidance of stream loss and reclamation of wetlands is not practicable when taking into account the functional need of the project and site context. Despite some

	Reference	Chapter E Objective/Policy	Commentary
		(a) the mauri of the freshwater environment; and (b) Mana Whenua values in relation to the freshwater environment.	unavoidable loss, the Project has sought to avoid significant adverse effects of reclamation through avoidance where possible. For the remaining freshwater systems on site, as described in rows 24-28, 4 and 99, the project has been designed, as far as practicable to remedy or mitigate the effects on the mauri and mana whenua values in relation to freshwater. This is achieved through incorporation of riparian and wetland planting to enhance freshwater habitats and water quality; incorporation of cultural values into the management of the site and conditions of consent. It is acknowledged, that there will be significant adverse effects on the mauri of those streams and wetlands proposed to be removed, and this aspect of the Project is contrary to Policy 5.
135.	E3.3 Policy (6)	Manage the adverse effects on Mana Whenua cultural heritage that is identified prior to, or discovered during, subdivision, use and development by: (a) complying with the protocol for the accidental discovery of kōiwi, archaeology and artefacts of Māori origin; (b) undertaking appropriate actions in accordance with mātauranga and tikanga Māori; and (c) undertaking appropriate measures to avoid adverse effects, or where adverse effects cannot be avoided, effects are remedied or mitigated.	Accidental discovery protocols and ongoing consultation with Mana Whenua is proposed among other management and monitoring measures. Refer to Section 6.6 of the AEE and Rows 22 - 23 above. The Project is consistent with Policy 6.
136.	E3.3 Policy (7)	<i>Structures and the diversion of surface water</i> Provide for the operation, use, maintenance, repair, erection, reconstruction, placement, alteration or extension, of any structure or part of any structure in, on, under, or over the bed	With regard to structures (culvert), refer to Row 127 and 130 above. In Stage 1, diversion of surface water is required for the purposes of erosion and sediment control. In the operational

	Reference	Chapter E Objective/Policy	Commentary
		of a lake, river, stream or wetland, and any associated diversion of water, where the structure complies with all of the following: (a) there is no practicable alternative method or location for undertaking the activity outside the bed of the lake, river, stream or wetland; (b) the structure is designed to be the minimum size necessary for its purpose to minimise modification to the bed of a lake, river, stream or wetland; (c) the structure is designed to avoid creating or increasing a hazard; (d) the structure is for any of the following: (i) required as part of an activity designed to restore or enhance the natural values of any lakes, rivers, streams or wetlands and their margins, or any adjacent area of indigenous vegetation or habitat of indigenous fauna; (ii) designed to maintain and/or enhance public access to, over and along any lake, river, stream or wetland and their margins; (iii) necessary to provide access across a lake, river, stream or wetland; (iv) associated with infrastructure; (v) necessary for flood protection and the safeguarding of public health and safety; or (vi) required for the reasonable use of production land. (e) the structure avoids significant adverse effects and avoids, remedies or mitigates other adverse effects on Mana Whenua values associated with freshwater resources, including wāhi tapu, wāhi taonga and mahinga kai.	stages (2-5), clean water diversions will be constructed to divert upper catchment clean water away from the area of works as part of ESC measures. These works would be undertaken in accordance with an approved ESCP Accordingly, to the extent this policy applies, any structures and surface water diversions would be consistent with it.
137.	E3.3 Policy (10)	<i>Planting of plants</i> Enable the planting of any plant, excluding pest species, in, on, or under the bed of a lake, river, stream or wetland where it is suitable for habitat establishment, restoration or enhancement,	Refer to row 77. As outlined in Section 7.2 of the AEE, the stream offset package involves riparian planting of 1,053 m of stream length across four tributaries located within SAL landholdings and 2,289 m along the Western and Tutaenui

	Reference	Chapter E Objective/Policy	Commentary
		the maintenance and enhancement of amenity values, flood or erosion protection or stormwater runoff control provided it does not create or exacerbate flooding.	Streams at the Tuakau site and the creation of 4.04 ha of wetland habitat. This planting will consist of native species and where practicable will be sourced locally. Refer to Row 77 for further details. Accordingly, it is considered that the Project aligns with Policies 10-12.
138.	E3.3 Policy (11)	Encourage the planting of plants that are native to the area.	
139.	E3.3 Policy (12)	Encourage the incorporation of Mana Whenua mātauranga, values and tikanga in any planting in, on, or under the bed of a lake, river, stream or wetland	
140.	E3.3 Policy (13)	<i>Reclamation and drainage</i> Avoid the reclamation and drainage of the bed of lakes, rivers, streams and wetlands, including any extension to existing reclamations or drained areas unless all of the following apply: (a) there is no practicable alternative method for undertaking the activity outside the lake, river, stream or wetland; (b) for lakes, permanent rivers and streams, and wetlands the activity is required for any of the following: (i) as part of an activity designed to restore or enhance the natural values of any lake, river, stream or wetland, any adjacent area of indigenous vegetation or habitats of indigenous fauna; (ii) for the operation, use, maintenance, repair, development or upgrade of infrastructure; or (iii) to undertake mineral extraction activities; and (c) the activity avoids significant adverse effects and avoids, remedies or mitigates other adverse effects on Mana Whenua values associated with freshwater resources, including wāhi tapu, wāhi taonga and mahinga kai.	In respect of Policy 13, the first imperative is to avoid the reclamation of streams and wetlands. In that regard, the Sutton Block pit has been designed to avoid: • Reclamation of Wetland 2a South and Wetland 2b (refer to Figure 3.10 in the AEE) resulting in a reduction of 5,241 m² of wetland loss. • Reclamation of stream 2 and part of Stream 3 (refer to Figure 3.9 in the AEE) reducing stream reclamation by 610 m. • Expansion of the pit into the freshwater catchment located in the northwest corner above Stream 9 (refer to Figure 3.9 in the AEE). Other streams and wetlands cannot be avoided and accordingly the elements of Policy 13(a)-(c) need to be stepped through. In that regard: (a) There is no practicable alternative method for extracting the aggregate outside of the areas of streams and wetlands now proposed to be reclaimed. (b) The reclamation is required to undertake mineral extraction activities.

	Reference	Chapter E Objective/Policy	Commentary
			(c) The activity cannot avoid significant effects altogether (for any stream or wetland being reclaimed the effects on that stream or wetland will be significant), however when viewed in its entirety including having regard to the mitigation, offsetting proposed, the activity has avoided <i>significant</i> adverse effects to the greatest practicable extent and it has remedied or mitigated (and offset or compensated) other effects. Overall, the Project is not contrary to Policy 13.
141.	E3.3 Policy (15)	<i>Riparian margins</i> Protect the riparian margins of lakes, rivers, streams, and wetlands from inappropriate use and development and promote their enhancement through all of the following: (a) safeguard habitats for fish, plant and other aquatic species, particularly in rivers and streams with high ecological values; Auckland Unitary Plan Operative in part 6 E3 Lakes, rivers, streams and wetlands (b) safeguard their aesthetic, landscape and natural character values; (c) safeguard the contribution of natural freshwater systems to the biodiversity, resilience and integrity of ecosystems; and (d) avoid or mitigate the effects of flooding, surface erosion, stormwater contamination, bank erosion and increased surface water temperature.	The proposal includes the revegetation of riparian and wetland margins and the creation of new wetland habitat. This will provide a number of benefits including aesthetic, additional habitat for terrestrial species, resilience of ecosystems and mitigation of flooding, surface and bank erosion and contamination. The Project is consistent with Policy 15.
142.	E3.3 Policy (17)	<i>Natural inland wetlands</i> The loss of extent of natural inland wetlands is avoided, their values are protected, and their restoration is promoted, except where: [...] (d) the regional council is satisfied that:	In respect of Policy 17: - The loss of natural inland wetlands is necessary for quarrying. - As detailed in Sections 9.2 and 12 of the AEE, the proposed mineral extraction (and related quarrying

	Reference	Chapter E Objective/Policy	Commentary
		(i) the activity is necessary for the purpose of quarrying activities; and (ii) the extraction of the aggregate will provide significant national or regional benefits; and (iii) there is a functional need to the activity to be done in that location; and (iv) the effects of the activity will be managed through applying the effects management hierarchy; or (e) the regional council is satisfied that: (i) the activity is necessary for the purpose of: • the extraction of minerals (other than coal) and ancillary activities; or • the extraction of coal and ancillary activities as part of the operation or extension of an existing coal mine; and (ii) the extraction of the mineral will provide significant national or regional benefits; and (iii) there is a functional need for the activity to be done in that location; and (iv) the effects of the activity will be managed through applying the effects management hierarchy; or [...]	activities) will provide significant regional benefits (refer to row 38). - There is a functional need for the quarrying to occur in the proposed location. - The effects of the activity will be managed through the effects management hierarchy. Accordingly, the loss of natural inland wetlands is not, in this case, contrary to Policy 17. Likewise, in respect of Policy 18, there is a functional need for the quarrying to occur in the location proposed, and the effects of the activity will be managed through the effects management hierarchy. Accordingly, the loss of river extent and values is not contrary to Policy 18.
143.	E3.3 Policy (18)	The loss of river extent and values is avoided, unless the council is satisfied: (a) that there is a functional need for the activity in that location; and (b) the effects of the activity are managed by applying the effects management hierarchy.	
E11. Land Disturbance – Regional			
144.	E11.2 Objective (1)	Land disturbance is undertaken in a manner that protects the safety of people and avoids, remedies and mitigates adverse effects on the environment.	An ESCAR and ESP has been prepared (Technical Report R, Volume 2) that outlines specific erosion and sediment control measures to be implemented during construction

	Reference	Chapter E Objective/Policy	Commentary
145.	E11.2 Objective (2)	Sediment generation from land disturbance is minimised.	and operation of the Sutton Block. Some of the key measures include: • Perimeter controls. • Staging of earthworks (progressive stabilisation of the overburden area and batters). • Construction of clean and dirty water diversions. • Use of sediment retention ponds to capture and treat dirty water. • Decanting earth bunds. • Silt fences. On-going monitoring of erosion and sediment control measures will be undertaken throughout construction to provide feedback and enable an iterative staged management approach. Additional controls or measures will be implemented where and when (e.g. winter works) there is a greater risk of sediment discharges, or where monitoring indicates that additional controls are required. The ESC methodology is consistent with the industry-leading approach that has appropriately minimised sediment discharges and downstream effects on multiple projects throughout the Auckland Region. The Project is consistent with these Objectives 1-3.
146.	E11.2 Objective (3)	Land disturbance is controlled to achieve soil conservation	
147.	E11.3 Policy (1)	Avoid where practicable, and otherwise mitigate, or where appropriate, remedy adverse effects on areas where there are natural and physical resources that have been scheduled in the Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character.	Land disturbance of scheduled sites such as Historical Heritage Sites, Sites of Significance to Mana Whenua and the ONL overlay have been avoided by the proposed Sutton Block design. However, there is encroachment into SEAs and other natural features such as streams and wetlands that could not be practicably avoided in their entirety. As noted above, where avoidance is not possible mitigation, followed by offset measures for residual effects have been proposed

	Reference	Chapter E Objective/Policy	Commentary
			and are encapsulated through proposed conditions of consent. On this basis, the Project is considered broadly consistent with Policy 1.
148.	E11.3 Policy (2)	Manage land disturbance to: (a) retain soil and sediment on the land by the use of best practicable options for sediment and erosion control appropriate to the nature and scale of the activity; (b) manage the amount of land being disturbed at any one time, particularly where the soil type, topography and location is likely to result in increased sediment runoff or discharge; (c) avoid, remedy and mitigate adverse effects on accidentally discovered sensitive material; and (d) maintain the cultural and spiritual values of Mana Whenua in terms of land and water quality, preservation of wāhi tapu, and kaimoana gathering.	With regard to (a) and (b) refer to the ESCAR and ESP (Technical Report R, Volume 2). (c) refer to row 29. (d) Refer to rows 10-14 above. The Project is consistent with Policy 2.
149.	E11.3 Policy (3)	Manage the impact on Mana Whenua cultural heritage that is discovered undertaking land disturbance by: (a) requiring a protocol for the accidental discovery of kōiwi, archaeology and artefacts of Māori origin; (b) undertaking appropriate actions in accordance with mātauranga and tikanga Māori; and (c) undertaking appropriate measures to avoid adverse effects. Where adverse effects cannot be avoided, effects are remedied or mitigated.	Refer to row 29 in regards to (a) and (b). Refer to row 25 in regards to (c). The Project is consistent with Policy 3.
150.	E11.3 Policy (4)	Enable land disturbance necessary for a range of activities undertaken to provide for people and communities' social, economic and cultural well-being, and their health and safety.	Land disturbance is required in order to develop the Sutton Block pit. Land disturbance will occur in respect of both the construction of access and the removal of overburden. Construction and development of the Sutton Block will enable people and communities of the Auckland Region to

	Reference	Chapter E Objective/Policy	Commentary
			provide for their social, economic and cultural wellbeing and for their health and safety by providing a secure continued supply of aggregate, which is a critical component in the construction and maintenance of infrastructure, housing and transport links. The Project provide significant regional benefits, and the enablement of land disturbance activities is therefore consistent with Policy 4.
151.	E11.3 Policy (5)	Design and implement earthworks with recognition of existing environmental site constraints and opportunities, specific engineering requirements, and implementation of integrated water principles.	Staging specific ESC drawings have been prepared for Stage 1 enabling works, what is considered the 'bulk earthworks' aspects of the project. The proposed ESC measures have been designed to reflect site constraints and opportunities. The Project is consistent with Policy 5.
152.	E11.3 Policy (6)	Require that earthworks are designed and undertaken in a manner that ensures the stability and safety of surrounding land, buildings and structures.	As stated in the ESCR, the proposed ESC methodology is the best practicable option for the proposal and includes staging, and progressive stabilisation (refer to Rows 143-145). A Slope Stability Management Plan (SSMP) is included in the conditions. The Project is consistent with Policy 6.
153.	E11.3 Policy (7)	Require any land disturbance that will likely result in the discharge of sediment laden water to a surface water body or to coastal water to demonstrate that sediment discharge has been minimised to the extent practicable, having regard to the quality of the environment; with: (a) any significant adverse effects avoided, and other effects avoided, remedied or mitigated, particularly in areas where there is: (i) high recreational use; (ii) relevant initiatives by Mana Whenua, established under regulations relating to the conservation or	Refer to Section 9.6 of the AEE, ESCAR and ESP (Technical Report R, Volume 2) and Rows 143-145. Although specific measures differ, the key ESC measures across both Stage 1 and the pit development and operational stages (Stage 2 – 5), include: • Clean water diversions to divert upper catchment clean water away from the area of works. • Temporary and permanent staged clean water stream diversion channels to divert the catchment stream flows around the Sutton Block.

	Reference	Chapter E Objective/Policy	Commentary
		management of fisheries, including taiāpure, rāhui or whakatupu areas; (iii) the collection of fish and shellfish for consumption; (iv) maintenance dredging; or (v) a downstream receiving environment that is sensitive to sediment accumulation; (b) adverse effects avoided as far as practicable within areas identified as sensitive because of their ecological values, including terrestrial, freshwater and coastal ecological values; and (c) the receiving environments ability to assimilate the discharged sediment being taken into account.	• Undertaking the works progressively to minimise the open areas. • Use of silt fences will be used to treat site runoff from small areas that will not actively drain to a SRP or DEB. • Use of SRP or DEB (limited to the overburden stockpile and stream diversion works). The AEE concludes that based on the iterative staged management approach to sediment management, the proposed measures to be implemented during the construction and operation of the Sutton Block, sediment generation will be minimised, such that the potential additional sediment load generated from the site will be minor. Therefore, it is considered that the Project is consistent with Policy 7.
E12. Land disturbance – District [dp]			
154.	E12.2 Objective (1)	Land disturbance is undertaken in a manner that protects the safety of people and avoids, remedies and mitigates adverse effects on the environment.	Refer to ESCAR and ESP (Technical Report R, Volume 2). The Project is consistent with Objective 1.
155.	E12.3 Policy (1)	Avoid where practicable, and otherwise, mitigate, or where appropriate, remedy adverse effects of land disturbance on areas where there are natural and physical resources that have been scheduled in the Plan in relation to natural heritage, Mana Whenua, natural resources, coastal environment, historic heritage and special character.	Refer to row 148 above. The Project is consistent with Policy 1.
156.	E12.3 Policy (2)	Manage the amount of land being disturbed at any one time, to: (a) avoid, remedy or mitigate adverse construction noise, vibration, odour, dust, lighting and traffic effects; (b) avoid, remedy and mitigate adverse effects on accidentally discovered sensitive material; and	Refer to ESCAR and ESP (Technical Report R, Volume 2). The Project is consistent with Policy 2.

	Reference	Chapter E Objective/Policy	Commentary
		(c) maintain the cultural and spiritual values of Mana Whenua in terms of land and water quality, preservation of wāhi tapu, and kaimoana gathering.	
157.	E12.3 Policy (3)	Enable land disturbance necessary for a range of activities undertaken to provide for people and communities social, economic and cultural well-being, and their health and safety.	Refer to row 151 above. The Project is consistent with Policy 3.
158.	E12.3 Policy (4)	Manage the impact on Mana Whenua cultural heritage that is discovered undertaking land disturbance by: (a) requiring a protocol for the accidental discovery of kōiwi, archaeology and artefacts of Māori origin; (b) undertaking appropriate actions in accordance with mātauranga and tikanga Māori; and (c) undertaking appropriate measures to avoid adverse effects, or where adverse effects cannot be avoided, effects are remedied or mitigated.	Refer to row 148 above. The Project is consistent with Policy 4.
159.	E12.3 Policy (5)	Design and implement earthworks with recognition of existing environmental site constraints and opportunities, specific engineering requirements, and implementation of integrated water principles.	Refer to row 152 above. The Project is consistent with Policy 5.
160.	E12.3 Policy (6)	Require that earthworks are designed and undertaken in a manner that ensures the stability and safety of surrounding land, buildings and structures.	Refer to row 153 above. The Project is consistent with Policy 6.
E14. Air quality [rcp/rp]			
161.	E14.2 Objective (1)	Air quality is maintained in those parts of Auckland that have high air quality, and air quality is improved in those parts of Auckland that have low to medium air quality.	Refer to rows 51 and Air Quality Assessment (Technical Report K). The Project is consistent with Objective 1.
162.	E14.2 Objective (2)	Human health, property and the environment are protected from significant adverse effects from the discharge of contaminants to air.	Refer to row 52 and Air Quality Assessment (Technical Report K). The Project is consistent with Objective 2.

	Reference	Chapter E Objective/Policy	Commentary
163.	E14.2 Objective (3)	Incompatible uses and development are separated to manage adverse effects on air quality from discharges of contaminants into air and avoid or mitigate reverse sensitivity effects.	Refer to row 53 and Air Quality Assessment (Technical Report K). The Project is consistent with Objective 3.
164.	E14.2 Objective (4)	The operational requirements of light and heavy industry, other location-specific industry, infrastructure, rural activities and mineral extraction activities are recognised and provided for.	As a mineral extraction activity, the Sutton Block is proposed on a site where aggregate is located in situ and the majority of the proposed footprint (72%) is within the SPQZ. Enabling mineral extraction activities in this location is consistent with Objective 4.
165.	E14.3 Policy (1)	Manage the discharge of contaminants to air, including by having regard to the Auckland Ambient Air Quality Targets in Table E14.3.1, so that significant adverse effects on human health, including cumulative adverse effects, are avoided, and all other adverse effects are remedied or mitigated.	Refer to row 52 and Air Quality Assessment (Technical Report K). The Project is consistent with Policy 1.
	E14.3 Policy (3)	In the Rural – Rural Production Zone and Rural – Mixed Rural Zone [...]: (a) recognise that rural air quality is generally a result of dust and odours, and other emissions generated by rural production activities; (b) avoid, remedy or mitigate adverse effects of dust and odour discharges; (c) provide for minor and localised elevation of dust and odour levels where the air discharge is from: (i) rural production activities or rural industry; or (ii) the operation of infrastructure or location specific industry; or (iii) mineral extraction activities; or (iv) activities undertaken by the New Zealand Defence Force for training and munitions testing; or (v) for emergency services training;	Refer to rows 51-53 and Air Quality Assessment (Technical Report K). This policy expressly provides for minor and localised elevation of dust and odour levels where the air discharge is from mineral extraction activities in the Rural – Rural Production Zone and Rural – Mixed Rural Zones. As stated in row 52, we note that adverse effects from dust discharges are considered to be low. Accordingly, the Project is consistent with Policy 3.

	Reference	Chapter E Objective/Policy	Commentary
		(d) require adequate separation between use and development which discharge dust and odour and activities that are sensitive to these adverse effects.	
166.	E14.3 Policy (5)	Support the use and development in the [...], Special Purpose – Quarry Zone [...] by: (a) providing for higher levels of dust and odour provided that any adverse effects on human health are avoided, remedied or mitigated; (b) avoiding the establishment of activities sensitive to air discharges in these zones; and (c) discouraging the establishment of activities sensitive to air discharges in areas adjacent to these zones.	Refer to row 52 and Air Quality Assessment (Technical Report K). This policy expressly provides for higher levels of dust arising from activities within the SPQZ provided that any adverse effects on human health are avoided, remedied or mitigated. Proposed conditions of consent will ensure this is achieved. Accordingly, the Sutton Block expansion within the SPQZ is directly supported by Policy 5.
167.	E14.3 Policy (8)	Avoid, remedy or mitigate the adverse effects on air quality from discharges of contaminants into air by: (a) using the best practicable option for emission control and management practices that are appropriate to the scale of the discharge and potential adverse effects; or (b) adopting a precautionary approach, where there is uncertainty and a risk of significant adverse effects or irreversible harm to the environment from air discharges.	As detailed in rows 43-44 and the Air Quality Assessment (Technical Report K), a number of measures are proposed to manage air quality. Overall, in respect of discharges to air there is no risk of any significant adverse effects or irreversible harm to the environment, discharge of any dangerous substances in dust such as PM ₁₀ and RCS will be controlled with dust management, dust emissions will be minimised to within 50 to 100 m of the source, resulting in low likelihood of effects on any nearby sensitive receptors, there will be no noxious, dangerous, offensive or objectionable odour beyond the boundary . Overall, the Project is consistent with Policies 8 and 9.
168.	E14.3 Policy (9)	Avoid, remedy or mitigate the adverse effects on air quality beyond the boundary of the premises where the discharge of contaminants to air is occurring, in relation to: (a) noxious or dangerous effects on human health, property or the environment from hazardous air pollutants; or (b) overspray effects on human health, property or the environment.	
	E15. Vegetation management and biodiversity		

	Reference	Chapter E Objective/Policy	Commentary
169.	E15.2 Objective (1)	Ecosystem services and indigenous biological diversity values, particularly in sensitive environments, and areas of contiguous indigenous vegetation cover, are maintained or enhanced while providing for appropriate subdivision, use and development.	Refer to rows 31-34 above, and Assessment of Ecological Effects (Technical Report A, Volume 2). The Project is broadly consistent with Objective 1.
170.	E15.2 Objective (2)	Indigenous biodiversity is restored and enhanced in areas where ecological values are degraded, or where development is occurring.	Refer to rows 31-34 above, and Assessment of Ecological Effects (Technical Report A). Overall, the Project gives effect to Objective 2.
171.	E15.3 Policy (1)	Protect areas of contiguous indigenous vegetation cover and vegetation in sensitive environments including the coastal environment, riparian margins, wetlands, and areas prone to natural hazards.	Refer to rows 31-34 above, and Assessment of Ecological Effects (Technical Report A). The Project is broadly consistent with Policy 1.
172.	E15.3 Policy (2)	Manage the effects of activities to avoid significant adverse effects on biodiversity values as far as practicable, minimise significant adverse effects where avoidance is not practicable, and avoid, remedy or mitigate any other adverse effects on indigenous biological diversity and ecosystem services, including soil conservation, water quality and quantity management, and the mitigation of natural hazards.	Refer to rows 31-34 above, and Assessment of Ecological Effects (Technical Report A). The Project has avoided significant effects as far as practicable. Where this was not possible, they have been minimised, with residual adverse effects on terrestrial and freshwater ecosystems being managed through an offset package to achieve Net Gain.
173.	E15.3 Policy (3)	Encourage the offsetting of any significant residual adverse effects on indigenous vegetation and biodiversity values that cannot be avoided, remedied or mitigated, through protection, restoration and enhancement measures, having regard to Policy E15.3(4) below and Appendix 8 Biodiversity offsetting.	Accordingly, the Project is consistent with Policy 3.
174.	E15.3 Policy (4)	Protect, restore, and enhance biodiversity when undertaking new use and development through any of the following: (a) using transferable rural site subdivision to protect areas in Schedule 3 Significant Ecological Areas -Terrestrial Schedule; (b) requiring legal protection, ecological restoration and active management techniques in areas set aside for the purposes of mitigating or offsetting adverse effects on indigenous biodiversity; or	Refer to rows 31-34 above, and Assessment of Ecological Effects (Technical Report A). Notably, the significant ecological areas to the east and north of the site within SAL Landholdings, will also be protected in perpetuity by covenants. The Project is consistent with Policy 4.

	Reference	Chapter E Objective/Policy	Commentary
		(c) linking biodiversity outcomes to other aspects of the development such as the provision of infrastructure and open space.	
	E24. Lighting [rcp/dp]		
175.	E24.2 Objective (1)	Artificial lighting enables outdoor activities and the security and safety of people and property.	Lighting is required as part of the proposed Sutton Block. The LVA (Technical Report J). Lighting will be managed to comply with the permitted standards for the Rural Zone under the AUP. The placement and direction of lights will avoid high points which are visible outside of the Site. Light shields will be used where necessary, and all lightings shall be down facing to minimise effects on the night sky. Based on these measures, it is considered that the Project is consistent with Objectives 1-2 and Policies 2-3.
176.	E24.2 Objective (2)	The adverse effects of outdoor lighting on the environment and safety of road users are limited.	
177.	E24.3 Policy (1)	Provide for appropriate levels of artificial lighting to enable the safe and efficient undertaking of outdoor activities, including night time working, recreation and entertainment.	
178.	E24.3 Policy (2)	Control the intensity, location and direction of artificial lighting to avoid significant glare and light spill onto adjacent sites, maintain safety for road users and minimise the loss of night sky viewing.	
179.	E24.3 Policy (3)	Use area or activity specific rules where the particular functional or operational needs of the area or activity make such rules appropriate.	
	E25. Noise and vibration [rcp/dp]		
180.	E25.2 Objective (1)	People are protected from unreasonable levels of noise and vibration.	While the predicted noise levels for both daytime (with natural screening from the north-western pit edge in place) and nighttime works comply with the relevant AUP standards, noise generated by the project will result in an increase in ambient noise levels and a change in noise environment for some receivers. As stated in Section 6.2.5 of the AEE and, within Technical Report I, to manage noise effects the following measures are proposed:
181.	E25.3 Policy (2)	Minimise, where practicable, noise and vibration at its source or on the site from which it is generated to mitigate adverse effects on adjacent sites.	
182.	E25.3 Policy (3)	Encourage activities to locate in zones where the noise generated is compatible with other activities and, where practicable, adjacent zones.	
183.	E25.3 Policy (4)	Use area or activity specific rules where the particular functional or operational needs of the area or activity make such rules appropriate.	

	Reference	Chapter E Objective/Policy	Commentary
184.	E25.3 Policy (7)	Require activities to be appropriately located and/or designed to avoid where practicable or otherwise remedy or mitigate reverse sensitivity effects on: (a) existing or authorised infrastructure; (b) adjacent Business – Light Industry Zone and Business – Heavy Industry Zone; (c) existing lawfully established rural production activities; (d) major recreation facilities; (e) existing lawfully established commercial activities within Business – City Centre Zone, Business – Metropolitan Centre Zone, Business – Town Centre Zone, Business – Local Centre Zone, Business – Neighbourhood Centre Zone, Business – Mixed Use Zone; or (f) regionally significant mineral extraction activities.	- The pit bench will be designed to ensure natural screening (terrain in form of quarry benches or bund) in the north-western corner. - Two permanent noise monitoring sites will be established around Sutton Block – one to the west (i.e. near upper MacWhinney Drive) and one to the north-east (i.e. near Sonja or Laurie Drive). - A Construction Noise and Vibration Management Plan (CNVMP) is proposed to be prepared that will set out various mitigation and management measures to further minimise any potential construction noise effects. - An iterative management approach, in conjunction with on-going noise monitoring, will ensure that nighttime noise limits are not exceeded. - Quarry Management plan will set out operation noise management measures, including monitoring, recording of complaints and response procedure.
185.	E25.3 Policy (9)	<i>Noise arising from or affecting rural zones</i> Avoid, remedy or mitigate the adverse effects of noise in the rural environment, having regard to the working nature of this environment	Based on the implementation of these measures, it is considered that noise from both the construction and operation of the quarry will be appropriately managed to acceptable levels.
186.	E25.3 Policy (10)	<i>Construction, demolition and maintenance activities</i> Avoid, remedy or mitigate the adverse effects of noise and vibration from construction, maintenance and demolition activities while having regard to: (a) the sensitivity of the receiving environment; and (b) the proposed duration and hours of operation of the activity; and (c) the practicability of complying with permitted noise and vibration standards.	Vibration effects during and operational stages of the Sutton Block will be managed through implementation of controlled blast techniques. Construction vibration will be managed through the CNVMP. Overall, vibration effects will be managed to be less than minor. Overall, considering the management measures and that mineral extraction activities are typical features of the Rural–Rural Production zone (H19.2.4 Policy (2)) (refer to Row 243), and generally do not give rise to reverse sensitive issues, the Project is consistent with Objective 1 and Policies 2-4, 7, 9 and 10.

	Reference	Chapter E Objective/Policy	Commentary
	E28. Mineral extraction from land [rp/dp]		
187.	E28.2 Objective (1)	Mineral extraction from the land and its delivery is efficient and meets Auckland's needs while significant adverse effects are avoided, remedied or mitigated.	The proposed pit is within the SAL Landholdings and contains significant mineral resource. The Sutton Block enables more effective provision of aggregate being located in close proximity to projected future growth areas in South and East Auckland. Further, given the Sutton Block expansion is adjacent to the existing Drury Quarry pit, the existing quarry plant and ancillary infrastructure can be utilised, allowing for efficient use of an existing well-equipped facility. The Sutton Block has been designed to avoid, remedy or mitigate effects on natural and physical resources and where that is not possible to offset or compensate for them. The Project is consistent with Objective 1.
188.	E28.2 Objective (2)	The removal of vegetation, associated with mineral extraction activities within the significant ecological areas in the Special Purpose – Quarry Zone at Brookby Quarry, which is shown in Figure E15.10.1 Brookby Quarry extent, and Drury Quarry (excluding SEA_T_5349), which is shown in Figure E15.10.2 Drury Quarry extent, which has significant effects is avoided, remedied, mitigated or offset to the extent described in Policy D9.3.(8A).	Refer to row 78 above. The Project is aligned with Objective 2.

	Reference	Chapter E Objective/Policy	Commentary
189.	E28.3 Policy (1)	Avoid where practicable undertaking new mineral extraction activities in areas where there are natural and physical resources that have been scheduled in the Plan in relation to natural heritage, Mana Whenua, natural resources, coastal, historic heritage and special character.	Mineral extraction activities have a functional need to be undertaken where aggregate is located in situ, such as within the Sutton Block. The majority of the proposed Sutton Block footprint (72%) is within the SPQZ. As noted in row 54 the site was also zoned for Quarry purposes under the Papakura District Plan. Refer to rows 131 and 148 regarding avoidance of natural and physical resource (natural heritage, Mana Whenua, historic heritage and special character) and how this has been taken into account and prioritised as part of the project design. When considered in the context of broader mineral extraction directives, the Project is broadly consistent with Policy 1.
190.	E28.3 Policy (2)	Where it is not practicable to locate mineral extraction activities outside the areas identified in Policy E28.3(1), consideration will be given to all of the following: (a) the benefits likely to be derived from the mineral extraction activities; (b) any reduced transport effects from having a mineral extraction site closer to the area of demand; (c) the extent to which significant adverse effects can be avoided; and (d) the extent to which adverse effects can be remedied, mitigated or, where not mitigated, can be offset.	Refer to Section 9.2 of the AEE. (a) Refer to the Economic Impact Assessment (Technical Report S) and row 1. (b) Refer to the Economic Impact Assessment (Technical Report N) and Integrated Transportation Assessment (Technical Report U) and row 1. (c-d) Where effects on terrestrial and freshwater features cannot be avoided, remedied or mitigated, they will be offset and compensated with a comprehensive ecological package. Accordingly, the Project is aligned with Policy 2.
191.	E28.3 Policy (4)	Avoid, remedy or mitigate as far as practicable significant adverse effects associated with mineral extraction activities.	Refer to Row 205 above. The Project is consistent with Policy 4.
192.	E28.3 Policy (5)	Require proposals for new mineral extraction activities in rural areas to provide adequate information on the establishment and operation of the activity and demonstrate: (a) the size and scale of extraction activities and the expected length of operation of the extraction site;	Policy 5 relates to the proposed expansion of the Sutton Block pit outside of the SPQZ into the immediately adjacent rural area. In respect of the elements of Policy 5: (a) The majority of the proposed 108 ha Sutton Block footprint (78 ha or 72% of the footprint) is proposed to be

	Reference	Chapter E Objective/Policy	Commentary
		(b) the design and layout of the site, the access roads and supporting facilities; (c) that adequate measures will be used to: (i) manage noise, vibration, dust and illumination to maintain amenity values of the surrounding land uses, particularly at night-time; (ii) manage adverse effects of traffic generation and maintain safety to all road users, particularly measures to manage heavy vehicles entering or exiting the site; (iii) avoid, remedy or mitigate adverse effects on soil and water quality, including impacts on watercourses within the extraction site and the effects of discharges from the site into the neighbouring environment; (iv) maintain land stability; (v) mitigate significant adverse effects on visual and landscape values; and (vi) protect the values of identified heritage or archaeological sites, buildings, places or areas, along with Mana Whenua values. (d) options anticipated for the rehabilitation of the site, either by a staged process or at the end of the economic life of the quarry, having regard to the expected life of the mineral extraction site.	within the SPQZ. The remaining extent (30 ha or 28% of the footprint) is proposed within the Rural Zoning. Construction and operation of the quarry is expected across a 50 year timeframe, noting the actual encroachment into the rural zone will be contained to the north until approximately Year 30. (b) Refer to ESCP (Technical Report R, Volume 2). (c) Refer Section 9 of the AEE. (d) As required by the proposed Quarry Management Plan (QMP) condition, the certified QMP is to confirm details on the Closure and Rehabilitation of the Sutton Block within no longer than 5 years of closure. The Project is consistent with Policy 5.
193.	E28.3 Policy (6)	Require a quarry management plan for mineral extraction activities to be prepared to address operational matters associated with mineral extraction, including management of adverse effects and actions to avoid, remedy, mitigate or offset these effects.	A draft QMP (attached as Appendix J) sets out protocols associated with operational matters associated with the Sutton Block. Specifically, it provides details on the stages and order of quarry development, operation noise and vibration management, ESC plans and eventually details on the closure and rehabilitation of the site. Accordingly, the Project is aligned with Policy 6.

	Reference	Chapter E Objective/Policy	Commentary
194.	E28.3 Policy (8)	Enable the use of the mineral extraction site for activities compatible with mineral extraction activities and provide for a range of appropriate activities within or adjoining the mineral extraction sites where these rely on minerals as a raw material.	Refer to 190 above. The Sutton Block is compatible with the existing land use within the SPQZ, being Drury Quarry. The current wider landscape is already characterised by existing quarrying activities. The Project is consistent with Policy 8.
195.	E28.3 Policy (10)	Require quarry operators to internalise the adverse effects associated with new mineral extraction activities as far as practicable while recognising the need to allow for the efficient ongoing extraction of mineral resources.	Noise, light, dust and vibration effects are expected to be internalised, as far as practicable, while recognising the need to allow for the efficient ongoing extraction of mineral resources (refer to rows 51 and 176-187 above). Accordingly, the Project is consistent with Policy 10.
E30. Contaminated land [rp]			
196.	E30.2 Objective (1)	The discharge of contaminants from contaminated land into air, or into water, or onto or into land are managed to protect the environment and human health and to enable land to be used for suitable activities now and in the future.	This objective and policy refers to a very small area of land at the north-eastern end of the Sutton Block. Refer to rows 70 and 71. The Project is consistent with Objective 1 and Policy 2.
197.	E30.2 Policy (2)	Require any use or development of land containing elevated levels of contaminants resulting in discharges to air, land or water to manage or remediate the contamination to a level that: (a) allows contaminants to remain in the ground/groundwater, where it can be demonstrated that the level of residual contamination is not reasonably likely to pose a significant adverse effect on human health or the environment; and (b) avoids adverse effects on potable water supplies; and (c) avoids, remedies or mitigates significant adverse effects on ecological values, water quality, human health and amenity values; while taking into account all of the following:	

	Reference	Chapter E Objective/Policy	Commentary
		(d) the physical constraints of the site and operational practicalities; (e) the financial implications of the investigation, remediation, management and monitoring options; (f) the use of best practice contaminated land management, including the preparation and consideration of preliminary and detailed site investigations, remedial action plans, site validation reports and site management plans for the identification, monitoring and remediation of contaminated land; and (g) whether adequate measures are in place for the transport, disposal and tracking of contaminated soil and other contaminated material removed from a site to prevent adverse effects on the environment.	
E36. Natural hazards and flooding			
198.	E36.2 Objective (1)	Subdivision, use and development outside urban areas does not occur unless the risk of adverse effects to people, property, infrastructure and the environment from natural hazards has been assessed and significant adverse effects are avoided, taking into account the likely long-term effects of climate change	Several Flood Plains are located within the site, generally following the position of the overland flow paths. Almost all of the affected floodplains are located within the SPQZ. A number of overland flow paths are also identified within the proposed LOQ footprint. These will be diverted or filled as the LOQ footprint expands, as shown on the drawings in Technical Report R, Volume 2. The quarry pit has been designed to respond to natural hazards, in particular, areas of seismic activity and floodplains (refer to Row 61 above for further detail). Overall, the Project is not expected to create new risks or increase existing risks associated with natural hazards.
199.	E36.2 Objective (4)	Where infrastructure has a functional or operational need to locate in a natural hazard area, the risk of adverse effects to other people, property, and the environment shall be assessed and significant adverse effects are sought first to be avoided or, if avoidance is not able to be totally achieved, the residual effects are otherwise mitigated to the extent practicable.	
200.	E36.2 Objective (5)	Subdivision, use and development including redevelopment, is managed to safely maintain the conveyance function of floodplains and overland flow paths.	

	Reference	Chapter E Objective/Policy	Commentary
201.	E36.2 Objective (6)	Where appropriate, natural features and buffers are used in preference to hard protection structures to manage natural hazards.	For the reasons outlined in Rows 61-69, and as discussed in 7.3 of the AEE report, the project is consistent with Objectives 1, 4, 5 and 6 and Policies 3, 4, 29-32, and 35.
202.	E36.3 Policy (3)	<i>General</i> Consider all of the following, as part of a risk assessment of proposals to subdivide, use or develop land that is subject to natural hazards: (a) the type, frequency and scale of the natural hazard and whether adverse effects on the development will be temporary or permanent; (b) the type of activity being undertaken and its vulnerability to natural hazard events; (c) the consequences of a natural hazard event in relation to the proposed activity; (d) the potential effects on public safety and other property; (e) any exacerbation of an existing natural hazard risk or the emergence of natural hazard risks that previously were not present at the location; (f) whether any building, structure or activity located on land subject to natural hazards near the coast can be relocated in the event of severe coastal erosion, inundation or shoreline retreat; (g) the ability to use non-structural solutions, such as planting or the retention or enhancement of natural landform buffers to avoid, remedy or mitigate hazards, rather than hard protection structures; (h) the design and construction of buildings and structures to mitigate the effects of natural hazards; (i) the effect of structures used to mitigate hazards on landscape values and public access; (j) site layout and management to avoid or mitigate the adverse effects of natural hazards, including access and exit during a natural hazard event; and	

	Reference	Chapter E Objective/Policy	Commentary
		(k) the duration of consent and how this may limit the exposure for more or less vulnerable activities to the effects of natural hazards including the likely effects of climate change.	
203.	E36.3 Policy (4)	Control subdivision, use and development of land that is subject to natural hazards so that the proposed activity does not increase, and where practicable reduces, risk associated with all of the following adverse effects: (a) accelerating or exacerbating the natural hazard and/or its potential impacts; (b) exposing vulnerable activities to the adverse effects of natural hazards; (c) creating a risk to human life; and (d) increasing the natural hazard risk to neighbouring properties or infrastructure.	
204.	E36.3 Policy (29)	<i>Overland flow paths</i> Maintain the function of overland flow paths to convey stormwater runoff safely from a site to the receiving environment.	
205.	E36.3 Policy (30)	Require changes to overland flow paths to retain their capacity to pass stormwater flows safely without causing damage to property or the environment.	
206.	E36.3 Policy (31)	<i>Land instability</i> Identify land that may be subject to land instability taking into account all of the following features: (a) proximity to cliffs; (b) steepness of land; (c) geological characteristics; and (d) uncontrolled fill.	
207.	E36.3 Policy (32)	Require risk assessment prior to subdivision, use and development of land subject to instability.	

	Reference	Chapter E Objective/Policy	Commentary
208.	E36.3 Policy (35)	<i>Infrastructure in areas subject to natural hazards</i> Allow for the operation, maintenance, upgrading and construction of infrastructure, in areas subject to natural hazards when: (a) infrastructure is functionally or operationally required to locate in hazard areas or it is not reasonably practicable that it be located elsewhere; (b) in coastal hazard areas the infrastructure does not significantly increase risk to people, property and the environment, and where risks cannot be avoided, adverse effects are mitigated; and (c) in all flood hazard areas risks to people, property and the environment are mitigated to the extent practicable.	

Table 4: AUP Chapter H Zones: objectives and policies assessment

	Reference	Chapter H Objective/Policy	Commentary
	H19. Rural zones [dp]		
209.	H19.2.1 Objective (1)	Rural areas are where people work, live and recreate and where a range of activities and services are enabled to support these functions.	The proposed design results in a relatively small proportion of the Sutton Block (28%), extending into Rural Zoning (predominately the Rural Mixed Use Zone) with the remaining 72% located within the SPQZ. The AUP Rural Zone policy framework explicitly acknowledges that mineral extraction activities are typical features of the Rural–Rural Production and Rural – Mixed Rural Zones. This policy position is reflected in the immediately wider surrounding landscape, where three existing quarries operate within wider rural areas, reinforcing the presence of mineral extraction activities within rural areas.

	Reference	Chapter H Objective/Policy	Commentary
			Therefore, the Project is considered to be generally consistent with Objective 1.
210.	H19.2.1 Objective (3)	Elite soil is protected, and prime soil is managed, for potential rural production.	The Sutton Block is located on non-arable (Class 6 soils). This land has slight to moderate limitations to pastoral use but is suitable for tree crops and/or forestry and in some case vineyards. The land is not considered to be highly productive land containing elite soils as per NPS HPL and is not suitable for some rural activities. On this basis, the Project is aligned with Objective 3.
211.	H19.2.3 Objective (1)	<i>Rural character, amenity and biodiversity values</i> The character, amenity values and biodiversity values of rural areas are maintained or enhanced while accommodating the localised character of different parts of these areas and the dynamic nature of rural production activities.	The existing Drury Quarry has been in operation for 80 years. As noted in row 210, there are two other existing quarries operating within the wider rural area. The land adjoining the Sutton block consists of a mixture of farmland, forestry and rural residential living. The proposed offset package will result in 62 ha of restoration planting that will in the longer term maintain and enhance the local rural landscape. As mentioned in row 206 above, noise, lighting, dust and vibration effects will be internalised as far as practicable. The Sutton Block is located in close proximity to SH1 and the roading infrastructure servicing the quarry has been designed to accommodate the Sutton Block expansion. The Measures include a buffer planting in specified locations, construction of the northern bund and screening planting Accordingly, the Project is consistent with Objective 1.
212.	H19.2.3 Objective (2)	<i>Rural character, amenity and biodiversity values</i>	In terms of enhancing areas of significant indigenous biodiversity refer to row 77. In terms of protection, a condition of consent is proposed to protect in perpetuity the

	Reference	Chapter H Objective/Policy	Commentary
		Areas of significant indigenous biodiversity are protected and enhanced.	62 ha of proposed replanting, 108 ha of forest enhancement, primarily covering existing SEA vegetation, along with the proposed riparian planting offered as part of the ecological offset package through a covenant. Overall, the Project is considered to be generally consistent with Objective 2.
213.	H19.2.4 Policy (2)	<i>Rural character, amenity and biodiversity values</i> Recognise the following are typical features of the Rural – Rural Production Zone, Rural – Mixed Rural Zone and Rural – Rural Coastal Zone and will generally not give rise to issues of reverse sensitivity in these zones: (a) the presence of large numbers of farmed animals and extensive areas of plant, vine or fruit crops, plantation forests and farm forests; (b) noise, odour, dust, traffic and visual effects associated with use of the land for farming, horticulture, forestry, mineral extraction and cleanfills; (c) the presence of existing mineral extraction activities on sites zoned as Special Purpose – Quarry Zone; (d) accessory buildings dot the landscape, particularly where farming activities are the dominant activity; and (e) activities which provide for the relationship of Mana Whenua to their ancestral land and taonga.	This policy explicitly acknowledges that mineral extraction activities are typical features of the Rural–Rural Production and Rural – Mixed Rural Zones and that noise, dust, traffic and visual effects associated with mineral extraction activities generally will not give rise to reverse sensitivity issues. This policy position is reflected in the immediately wider surrounding landscape, where three existing quarries operate within wider rural areas, reinforcing the presence of mineral extraction activities within rural areas. On this basis, the Project is consistent with Policy 2.
214.	H19.2.4 Policy (3)	Enable opportunities to protect existing Significant Ecological Areas or provide opportunities to enhance or restore areas to areas meeting criteria of Significant Ecological Areas.	Refer to rows 34 and 77 above. It is considered that the Project is consistent with this Policy 3.

	Reference	Chapter H Objective/Policy	Commentary
215.	H19.3.2 Objective (1)	A range of rural production, rural industries, and rural commercial activities take place in the zone.	Refer to rows 57, 60 and 210 above.
216.	H19.3.3 Policy (1)	Provide for a range of existing and new rural production, rural industry and rural commercial activities and recognise their role in determining the zone's rural character and amenity values.	When considering that mineral extraction activities are typical features of the Rural–Rural Production zone (H19.2.4 Policy (2)), and given the immediately adjacent SPQZ, the Project is consistent with Objective 1 and Policy 1.
217.	H19.4.2 Objective (3)	Rural character and amenity values of the zone are maintained while anticipating a mix of rural production, non-residential and rural lifestyle activities.	Refer to rows 210 and 214 above with regard to character. Visually, the proposed quarry footprint is well-contained by existing topography and vegetation, and visual amenity effects are limited to specific properties and specific parts of the quarry operation. Mitigation planting is proposed to help manage visual effects. Overall, the Project is considered to be generally consistent with Objective 3.
218.	H19.4.3 Policy (2)	<i>Rural character, amenity and biodiversity values</i> Manage reverse sensitivity effects by: (a) limiting the size, scale and type of non-rural production activities; (b) retaining the larger site sizes within this zone; (c) limiting further subdivision for new rural lifestyle sites; and (d) acknowledging a level of amenity that reflects the presence of: (i) rural production and processing activities that generate rural odours, noise from stock and the use of machinery, and the movement of commercial vehicles on the local road network; and (ii) non-residential activities which may generate noise, light and traffic levels greater than those	Refer to rows 210 and 214 above.

	Reference	Chapter H Objective/Policy	Commentary
		normally found in areas set aside for rural lifestyle activities.	
	H28. Special Purpose – Quarry Zone [dp]		
219.	H28.2 Objective (1)	Mineral extraction activities and appropriate compatible activities are carried out efficiently at significant mineral extraction sites.	The majority of the Sutton Block (72%) is located within the SPQZ. This zone provides for significant mineral extraction activities to ensure that mineral extraction can continue in a manner that minimises adverse effects. The zone prioritises supply of mineral sources from within Auckland and seeks to ensure that demand for minerals can be met. The proposed Sutton Block pit is within the SAL Landholdings and contains significant mineral resource. Furthermore, given the Sutton Block expansion is adjacent to the existing Drury Quarry pit, the existing quarry plant and ancillary infrastructure can be utilised, allowing for efficient use of an existing well-equipped facility. The Sutton Block is compatible with the existing land use within the SPQZ, being Drury Quarry. The current wider landscape is already characterised by existing quarrying activities. Therefore, the Project is consistent with Objective 1.
220.	H28.2 Objective (2)	The significant adverse effects associated with mineral extraction are avoided, remedied or mitigated.	The Sutton Block has been designed to avoid, remedy or mitigate effects on natural and physical resources. The proposal will result in residual terrestrial and freshwater adverse effects, which could not be avoided, mitigated or remedied. Accordingly, these effects are addressed through a comprehensive ecological offset package which is designed to achieve a net gain in ecological values. Overall, it is considered that the significant adverse effects associated with mineral extraction are avoided, remedied or mitigated. Therefore, the Project is consistent with Objective 2.

	Reference	Chapter H Objective/Policy	Commentary
221.	H28.3 Policy (2)	Enable appropriate compatible land uses within or adjoining the zone, including mineral recycling activities and the manufacture of products using raw materials from mineral extraction activities.	Refer to rows 190 and 195 above. The Project is consistent with Policy 2.
222.	H28.3 Policy (3)	Avoid where practicable, or otherwise remedy and mitigate significant adverse effects on areas where there are natural and physical resources that have been scheduled in the Plan in relation to natural heritage, Mana Whenua, natural resources, coastal, historic heritage and special character.	As noted in Row 190, the proposed Sutton Block pit has been designed and developed, with particular attention being given to the scheduled natural and physical values. Notably, the pit has been moved away from Kaarearea Paa to provide protection to important cultural heritage and the valued Rock Forest that is located within the Pa site. SAL also supported the inclusion of a Site of Significance to Mana Whenua overlay be scheduled over Kaarearea Paa as part of Plan Change 102 to recognise the importance of this feature to Mana Whenua. The Project avoids the Site of Significance to Mana Whenua overlay area, noting this meant a portion of the site zoned as SPQZ, became unable to be utilised for the quarry activities anticipated by the zone. However, it is not practicable to achieve the purpose of the SPQZ and avoid all scheduled features on the site. As discussed in Technical Report C & D, the Project will involve the removal of approximately 14.25 ha of SEA vegetation, both within and outside the SPQZ. Of this, around 7.58 ha is within the SPQZ, while the remainder falls within Rural Zoning. The offset package has been designed to offset the loss of ecological values on fauna and flora through 62 ha of revegetation and 108 hectares of native forest enhancement to achieve a Net Gain in biodiversity values. Accordingly, the Project is consistent with this the direction of Policy 3.

	Reference	Chapter H Objective/Policy	Commentary
223.	H28.3 Policy (4)	Manage noise, vibration, dust and illumination to protect existing adjacent activities sensitive to these effects from unreasonable levels of noise, vibration, dust and illumination.	Refer to rows 51-53 for dust, rows 176-180 for lighting and rows 196 -202 for noise and vibration management measures. Overall, these effects will be internalised as far as practicable. The Project is consistent with Policy 4.
224.	H28.3 Policy (5)	Require the rehabilitation of sites following mineral extraction activities to enable the land to be used for other purposes.	As required by the proposed Quarry Management Plan (QMP) condition, the certified QMP is to confirm details on the Closure and Rehabilitation of the Sutton Block at a point no later than 5 years from the predicted cessation of mineral extraction activities and closure of the quarry. Accordingly, the Project is not contrary to Policy 5.
225.	H28.3 Policy (6)	Avoid, remedy or mitigate adverse effects of traffic generation and maintain safety for all road users, and particularly measures to manage heavy vehicles entering or exiting the site and on quarry transport routes.	An assessment of the transport network has been undertaken and is discussed in the Integrated Traffic Assessment (Technical Report U). Overall, the Sutton Block will not result in any adverse network capacity/ operational or safety effects. The transport network has been designed and planned to service the existing Drury Quarry and has capacity to accommodate the Sutton Block. Accordingly, the Project is aligned with Policy 6.
226.	H28.3 Policy (7)	Require quarry operators to internalise the adverse effects associated with new or enlarged mineral extraction activities as far as practicable while recognising the need to allow for the efficient ongoing extraction of mineral resources.	Refer to row 224. The Project is consistent with Policy 7.