

Drury Quarry Sutton Block – Comments Tracker

No.	Name (Lead)	Specialism	S67 Comments	Site visit Required	Preliminary Comments Provided	Preliminary Comments	Applicants response	Council comments 25.8.25
1	Hillary Johnston	Healthy Waters	No	No	Yes	Healthy Waters have confirmed they have no comments in relation to this fast-track application.	No response required	
2	Lea Van Heerden (Lombard)	Parks Planning	Missing Specific Impact Assessments for Numerous Named Public Open Spaces Description of Missing Information: While the application includes general references to "Public Open Space" within the Zone of Theoretical Visibility (ZTV), it does not provide detailed, site-specific assessments for a number of named public open spaces, including: - Barber Road Local Purpose Reserve - Drury Hills Esplanade Reserve - Hingaia Stream Esplanade Reserve - Ngakaroa Reserve - Mercer Reserve - Runciman Reserve - Runciman Sports Complex Reserve - Pratt Road Recreation Reserve - Kern Road Esplanade Reserve - Sinclair Road Esplanade Reserve - Ararimu Cemetery - Pratt Road Cemetery – Te Maketu - Ararimu Hall The only reserve subject to specific impact analysis is Macwhinney Reserve, which is described in relation to visual amenity and screened views. All other reserves are generically referred to as "public open space" without any individualised discussion within the visual, noise, or air quality assessments. Why This Information is Essential: From a parks planning perspective, each public open space provides distinct amenity and recreational values that may be uniquely impacted by the proposed quarry expansion. A comprehensive assessment requires: - Specific visual impact assessments for each reserve to determine the degree of visibility of quarry activities (e.g., haul roads, exposed faces) and their impact on user experience, particularly where panoramic or curated views exist. - Consideration of amenity values, including how dust, noise (e.g., from blasting or machinery), and	No	Yes	- Secure conditions for ongoing visual screening maintenance adjacent to Macwhinney Reserve. - Request clarification on the visual amenity impact (if any) on other nearby parks within the ZTV. - Acknowledge ecological mitigation value but note the lack of recreation/open space outcomes – however, this may be a long-term challenge. - No objection from a parks asset management or acquisition perspective, as no new parks infrastructure is created or vested.	Refer to Landscape Memorandum prepared by Boffa Miskell dated 1 Aug 2025, attached as Attachment A for response in relation to potential adverse visual effects from the listed surrounding named public open spaces. In Summary, visual effects on these reserves are considered to range from Nil to Very Low. Further, visual screening is covered in the LVMMP and conditioned under Conditions 31-32. This includes screening to surrounding reserve areas. As set out in Section 9.4.1 of the AEE report, with dust mitigation measures in place, as required by the consent conditions and Dust Management Plan (DMP), dust emissions will be minimised to within 50 to 100m of the source. Therefore, there is no risk of dust effects on the named public open spaces. In regard to Noise effects, see Section 9.13.2 of the AEE report which concludes that during the potential worst-case scenarios during the development of the Quarry Pit, noise will comply with the relevant AUP limits at all nearby receivers and is required to comply with these standards under Condition 85. Therefore, no noise from the quarry will be heard from these public places.	

			vibration may impact the tranquility or enjoyment of these spaces. - Analysis of recreational use: It is unclear whether any reserves include walking tracks, picnic areas, or planned future amenities that could be affected. - Impacts on access: The potential for altered traffic patterns, haul road crossings, or public safety risks that may influence accessibility to or through any of these spaces is not discussed. Without this level of detail, it is not possible to determine whether site-specific mitigation or compensation is warranted, or whether the proposed screening and offset measures are adequate to preserve public enjoyment and use of these community assets.					
3	Lea Van Heerden (Lombard)	Parks Planning	The following question may not be parks-related – Parks and Community Facilities acknowledges that this should be a DOC query and raised with the premium. In some instances, DOC land can be managed by Parks and Community Facilities. However, we are still waiting for confirmation as to who manages the Hingaia Islands. Unsecured Landowner Approval for Key Ecological Offset on Public Conservation Land Description of Missing Information: The proposal includes approximately 5 hectares of ecological offset planting on Hingaia Islands, which are owned by the Department of Conservation (DoC). However, the application confirms that landowner approval has not yet been obtained. It states that the applicant is “engaging with DoC” and that planting “will not commence until landowner approval has been obtained.” Why This Information is Essential: The Hingaia Islands planting is described as a major component of the applicant’s offset and compensation package for the loss of streams and wetlands. From a parks and open space perspective, this is particularly significant because: - It involves publicly owned conservation land. - It is presented as a key environmental benefit of the project. - The offset’s contribution to regional ecological resilience and habitat enhancement is only meaningful if delivery is guaranteed.	No	Yes		We agree this is not an Auckland Council Parks and Community Facilities issue. The Hingaia Islands are owned by DoC.	

			If DoC landowner approval is not secured, this element of the offset remains speculative and introduces uncertainty into the mitigation strategy. A parks planner requires assurance that any ecological restoration involving public land is confirmed, achievable, and appropriately governed, particularly where it is being used to justify or balance significant environmental loss elsewhere in the landscape.					
4a	Charlie Song	Watercare	No comments Comments sent to applicant on 19.08.2025 1. How is the development site currently serviced in terms of water supply and wastewater? Please include the point of connection to the public network.	No	No		No response required Pleas provide response.	
4b			2. What is the expected increase in water supply demand and wastewater discharge resulting from the quarry expansion?					
4c			1-3. Will the dewatering activities impact Watercare's water sources?					
5	Nagaraj Prabhakara	Auckland Transport	The applicant hasn't provided any assessment on the existing roading structure ensuring existing roading structure can cater for the additional truck movements without creating any road safety issues for the other road users. According to Austroads section 12 guidelines, developments that create more than 10% heavy vehicle movements warrant an pavement impact assessment. Section 6.2 of the ITA states that the current proposal will increase truck movements from 600-700 on an average day to 1,200-1,400 trucks per day. The current proposal will have a net increase of 200% high commercial vehicles (HCV). Please provide a pavement impact assessment along the intended truck routes, ensuring the existing road structure can cater for the additional truck movements/loads and have no detrimental effects on the life of the road structure.	No	No		Structural pavement design and maintenance matters are not considered within the Integrated Transport Assessment (ITA) prepared by Don McKenzie Consulting Ltd (March 2025) (Technical Report U) ("Application ITA"). These matters relate to potential pavement damage (that may or may not be able to be directly related to the quarrying activity within the Sutton Block) should not form part of mitigation measures. Sources of funding for this come from Road User Charges and other Development Contribution type payments. The inappropriateness of attempting to impose such obligations through resource consents has been confirmed in recent Environment Court cases that will be very familiar to Auckland Transport and Auckland Council (eg Norsho Bulc Ltd v Auckland Council (2017) EnvC 109, [95]-[104]. See in particular [104] which states: "We consider that the road upgrading issue in this case can be squarely addressed by the road controlling authority through any of a number of options for the management of the road, as outlined above. We note that it may also be possible for the consent authority to address the broader issue through its policy on development contributions but, as we have already indicated, we cannot presume that the Council should make a policy to address	Unresolved – see AT comments dated 25.08.2025

							<i>these circumstances and so we do not give that any weight. These options may also enable one or both of those authorities to consider the most appropriate basis for enabling fill operations on sites with access via local roads while placing the burden of the cost of any damage to those roads on the person or persons who most appropriately should bear that cost, who may be the operators of the sites that receive the fill material, or the operators of the truck operations that transport the material on these roads, or the land developers whose activities generate the material”.</i>	
6	Nagaraj Prabhakara	Auckland Transport	Section 3.1 of the Integrated Traffic Assessment (ITA) states that proposed quarry operational trucks intend to use two routes for getting access between the quarry and the motorway. The second route is between the site and the SH22/SH1 interchange to the north. Please provide an assessment on the second route (Quarry Road including intersections of Quarry Road /Great South Road and Great South Road /SH22) to ensure the existing network has adequate capacity and no potential safety and operational issues from the proposed additional truck movements. AT understands that resource consent and engineering application approvals have been obtained by the other developer for the Quarry Road closure including extension of Maketu Road extension and bridge construction within the Maketu Road extension. There will be a period of Quarry Road closure from the bridge construction as well as impacts from other developments in the area. Therefore, quarry trucks will be fully assigned to the south route. This would mean 100% of trips will have to use the south route, please provide an assessment based on the entire trucks will have to use the south route.	No	No		As discussed in Section 6.3 (and in other places) of the Application ITA, there is no expected quarry-related travel via Fitzgerald Road. SH1 is expected to be the primary regional transport route catering for quarrying traffic to the wider Auckland region (lying to the north of the Drury Quarry). The preferred and most direct route between the quarry and SH1 is via Maketu Road and the Ramarama Interchange. The SH1 route to the north of Drury Quarry will be the route of preference for movements to the much wider parts of the region lying to the north. The only movements that may find the Maketu/Quarry route of any value would be the local Drury Central and/or Pukekohe. This would represent a much smaller proportion of movements to and from the Quarry and is not expected to generate any concerns from a traffic network capacity perspective. As noted in <i>Norsho Bulc</i>, at [95], referred to above, the use of roads is expressly a permitted activity in the Auckland Unitary Plan.	Unresolved – see AT comments dated 25.08.2025
7	Nagaraj Prabhakara	Auckland Transport	It is unclear whether the quarry traffic will be using Fitzgerald Road. Please confirm quarry traffic will be using Fitzgerald Road. An assessment of Fitzgerald Road will be required if the quarry traffic intends to use Fitzgerald Road for the quarry operation.	No	No		As discussed in Section 6.3 of the Application ITA, there is no expectation of any quarry-related travel via Fitzgerald Road. That route does not connect effectively to the regional transport routes (especially SH1).	Unresolved – see AT comments dated 25.08.2025
8	Nagaraj Prabhakara	Auckland Transport	Truck routes to Ramarama interchange transverses through Maketu Road/John Main Drive. Please provide an intersection analysis including capacity analysis at this intersection to ensure no potential	No	No		The Sutton Block expansion is not predicted to change the overall scale and intensity of traffic movement by the existing Drury Quarry. The Sutton Block will provide an extension to the availability of raw	Unresolved – see AT comments dated 25.08.2025

			adverse roading network operational issues from the additional truck movements at this intersection.				material (rock) to be processed into aggregate at the existing Quarry facilities. The Application ITA is based on the continued operation of the Stevenson Drury Quarry, as previously considered in the transport assessment of the Drury South Plan Change 46. The transport assessment and modelling undertaken by Beca and included in “Drury South Industrial Precinct - Plan Variation - Transport Assessment” prepared on behalf of Drury South Limited (November 2019) (“PC46 ITA”) included the activity proposed within the Drury South Precinct, (i.e. Plan Change 46 development), as well as all confirmed and likely land-use consents, and included continued Drury Quarry operations as existed at the time of 2019 assessment. The PC46 ITA assessment was used to establish and confirm the nature and form of the Drury South roading network, including the Bill Stevenson Drive and Maketu Road links. It included the number of lanes and intersection traffic controls both at the Bill Stevenson/Maketu and Maketu/John Main intersections). The proposed extension of quarrying activity and its traffic generation, as described and assessed in the Application ITA, is consistent with and aligns with the scale of activity assessed in the PC46 ITA of 2019. There is predicted to be no change in performance or operation of the Maketu/John Main intersection as a result of this FTAA application.	
9	Nagaraj Prabhakara	Auckland Transport	The Drury South Area is not yet fully developed. Please provide transport assessments with a scenario (including transport modelling of the scenario) including the full buildout of the Drury South development which represents future traffic conditions which will exist during the life of the development, not only the current traffic volumes and the traffic conditions for the surrounding area. This information is required to have a better understanding of the existing road network capacity and potential adverse impacts. The ITA document does not clearly include the Drury South fully developed scenario for its modelling. There is reference to the PC46 ITA on page 8, but it is not clear how these values were calculated or applied. The applicant needs to provide a detailed assessment of the likely traffic volumes for the Drury South fully developed	No	No		As discussed under row 8 above, the 2019 PC46 ITA included a full assessment of the land use development, including continued traffic operations associated with the Drury Quarry. As discussed, and assessed within the Application ITA, there is no intention or expectation that the quarrying activity that will be facilitated by this current application will increase the overall intensity or scale of traffic movements to and from the Drury Quarry (as provided for within the site’s current consents). The 2019 PC46 ITA captured current quarry-related traffic activity and projected this forward to a future year of 2036 when the weekday peak hour quarry-generated traffic activity was assessed as being 35-60 vph (18-40 trucks/hr) during the on-road	Unresolved – see AT comments dated 25.08.2025

			scenario as part of the current application. If the applicant relies on earlier traffic modelling from PC46, please provide the modelling details and explain clearly how it was calculated and applied.				peak of the surrounding road network. The busier times for quarrying activity tend to be off-set from the on-road peaks with peak quarrying traffic movement occurring earlier in the morning and during the middle of the day. In terms of background future growth of the surrounding Drury South area, Appendix A of the 2025 ITA supporting the current application adopted a 50% future year growth scenario. The assessment made on page (viii) of the Appendix (Transport Route Capacity Assessment) to the March 2025 ITA confirmed that this level of future growth was consistent with (and in some periods exceeded) the future traffic volumes predicted within the 2019 Beca ITA and traffic modelling in support of PC46.	
10	Nagaraj Prabhakara	Auckland Transport	Pages 8 & 9 of ITA states that Level of service (LOS) D is acceptable at the existing two signalised intersections, but according to AT's Network Operating Plan, on arterial roads the minimum LOS during peak periods is C. Please provide an updated assessment on the LOS of the network to ensure that to ensure that no potential adverse impact on the roading operation.	No	No		As discussed on page (ix) of the Application ITA Appendix, the concept of acceptable Level of Service can be somewhat arbitrary and that the Degree of Saturation (i.e. the ratio between traffic volume carried and capacity of an intersection) should be used in combination with a Level of Service assessment. As discussed under rows 8 and 9 above, the Sutton Block expansion is not proposed to change the intensity of current (consented) traffic movements by the existing quarry. Changes in background traffic movement, and hence any Level of Service change, associated with the Application is therefore largely a result of the wider area traffic movements within the public road network and is therefore a matter that AT is expected to monitor and manage on an on-going basis.	Unresolved – see AT comments dated 25.08.2025
11	Nagaraj Prabhakara	Auckland Transport	Please provide the copies of the Movement Summary Tables and Traffic Signal Phasing and Timing reports from SIDRA so that AT can confirm the traffic volumes on each leg of the intersections are reasonable and assess the potential average delay, queue lengths, and LOS for individual movements. Why is this Information Essential? The absence of this information significantly limits Auckland Transport's ability to assess the full extent of adverse effects on the transport network.	No	No		These documents are attached to this response as Attachment B. Note, that the requested SIDRA outputs were part of a wider analysis package (testing capacity) and do not necessarily reflect the proposed Sutton Block expansion. As mentioned in row 8 above, the Sutton Block expansion is not predicted to change the overall scale and intensity of traffic movement by the existing Drury Quarry. The Sutton Block will provide an extension to the availability of raw material (rock) to be processed into aggregate at the existing Quarry facilities.	Unresolved – see AT comments dated 25.08.2025

12	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	General Comments Deemed certification – Environmental Monitoring strongly oppose any condition that suggests a mechanism for “automatic certification”. Conditions should not be worded in a way that holds Council (the regulatory Authority) to a specific timeframe for any confirmation or certification. Conditions should not include an obligation on behalf of the Council – we are not the consent holder and we are not beholden to them. Management plans are a useful and accepted resource management tool for dealing with certain environmental effects of a proposal. Typically, a ‘draft’ management plan is provided as part of the consent process with a ‘final’ management plan being provided to, and certified by, the Council as a condition of consent. The Council appreciates that many projects are time-critical and that delays in the certification process can have flow-on consequences to the final delivery of the project. However, the certification of final management plans by the Council is a key step in ensuring that the environmental outcomes, as assessed and approved under the resource consent are achieved.	No amendment made to draft consent conditions. To provide necessary certainty for project delivery, we believe a defined timeframe is essential. We consider 30 working days from the date of receiving a Management Plan is a sufficient and reasonable period for Council to respond (note, the management plan doesn't need to be certified within the 30w/d period, merely that a decision be made as to whether the management plan is certified or not).	
13	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	General Comments Consistent referencing - Consistent referencing to Council throughout to avoid confusion as to who is certifying and / or receiving information for these consents.	Updated to refer to Council throughout. Refer to updated consent conditions dated 12 August, 2025 attached as Attachment C.	
14	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	General Comments Consistent reporting – Consistent report to Council throughout to avoid confusion. Recommend quarterly reporting for all operational reporting in the consent.	Updated to refer to Council throughout. No changes made to the frequency of operational reporting. Currently, the majority of operational reporting is required on an annual basis to be included in the Annual Monitoring Report. Refer to updated consent conditions dated 12 August 2025, attached as Attachment C.	
15	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	General Comments Consistent formatting and wording - Conditions should adopt standard Council formatting and wording – this will ensure the effectiveness of monitoring the consent and to assist with administration associated with the consent.	We've revised the conditions to align with Auckland Council's formatting throughout and incorporated their preferred wording where practicable. Refer to updated consent conditions dated 12 August 2025, attached as Attachment C.	

16	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	General Comments Conditions tagged to respective consent types - It is recommended that conditions are broken down into respective consents for efficient monitoring and to ensure pre-start requirements for each consent can be met, along with ongoing requirements. For example: specific conditions for LUC, specific conditions for WAT, conditions that apply to all consents. There appear to be no consent conditions for the contaminated land, stormwater, and stream works reasons for consent.	We've restructured the condition set to be broken down into respective consents as requested. The stream works consents are included in the specific LUC conditions. Stormwater conditions are managed through the specific LUC conditions related to earthworks. No stormwater discharge consent is sought. Contaminated land is currently proposed to be managed via the approved and certified Soil Management Plan and Remedial Action Plan. We have included a consent condition requested by Auckland Council Contaminated Land Expert who is happy with this approach.	
17	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part B – General Conditions B5 – Recommend adding the expiry date for the regional earthworks consent.	We've added a lapse condition (Condition 5) and duration conditions for each consent as conditions numbers 70, 118 and 133. Refer to updated consent conditions dated 12 August 2025, attached as Attachment C.	
18	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part B – General Conditions Recommend addition of S108 covenant condition to protect all planting completed under this consent.	We've added an additional covenant condition (Condition 99) that is in favour of the consent authority. Refer to updated consent conditions dated 12 August 2025, attached as Attachment C.	
19	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part C – Management Plans Recommend adding a condition to cover that any amendments to management plans need to be certified by Council prior to implementation.	We've added Conditions 13-17 to cover that any amendments to management plans need to be certified to Council prior to implementation. Refer to updated consent conditions dated 12 August 2025, attached as Attachment C.	
20	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part C – Management Plans C3 – recommend remove deemed certification condition.	Refer to our response at Row 12. We've retained deemed certification condition.	
21	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part C – Management Plans C11 – recommend addition of maintenance programme once planting is completed.	Condition 32 (h) requires the planting to be monitored and maintained for the duration of the project. Further, with the exception of the northern bund, the other proposed landscape planting is located within the overall offset package which is required to be maintained under Conditions 52-54. For these reasons, no changes were made to the Landscape and Visual Mitigation and Management Plan condition.	
22	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part C – Management Plans C11 – recommend addition of time bound contingency plan for any planting that does not establish.	This obligation is already required under the Net Gain Delivery Plan: Planting Plan (Conditions 52-54) and therefore, has not been added to the landscape management plan.	
23	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part C – Management Plans C24 – Closure and rehabilitation plans – it is	Currently as draft this condition requires the closure and rehabilitation plan to be	

						unclear what “only to be included within 5 years of confirmed closure” means. Is this 5 years before or after the closure? It is recommended that this needs to start being implemented from the date of closure.	provided within 5 years before the quarry's planned closure. This is to allow sufficient time to agree with Council the details of the closure and rehabilitation plan for the quarry. No amendments have been made.	
24	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part D – Construction works D2 – Recommend including that all devices and controls must be constructed in accordance with the approved erosion and sediment control plan. Further, we recommend no further earthworks are to proceed until the devices have been certified.	Condition 10(i) requires all devices and controls to be constructed in accordance with the approved ESCP (note, this is a requirement of all certified management plans). Therefore, no amendment was made. Certification of the Erosion and Sediment Control Plan (ESCP), which will include details of device, is required 20 working days before construction starts. We have not included a separate condition halting further earthworks pending device certification, as this would duplicate the primary ESCP approval process.	
25	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part D – Construction works D4 - (c) recommend the Earthworks and Streamworks Monitoring Officer is also notified within 24hrs of becoming aware of the failure.	Condition 79(d) has been updated to including notifying the Earthworks and Streamworks Monitoring Officer within 24 hours of the failure. Refer to updated consent conditions dated 12 August 2025, attached as Attachment C.	
26	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part E – Operational conditions Recommend add condition that a siren must sound prior to each blast.	No condition has been added requiring a siren to sound prior to each blast. This was not recommended by the Project team relevant specialists and is not required as part of the Drury Quarry existing operation.	
27	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part E – Operational conditions Recommend add condition that blasting activities are restricted to between 9am-5pm Monday to Saturday aligning with the AUP(OP).	Refer to new Condition 93 restricting blasting activities to between the requested times (refer to Attachment C).	
28	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part E – Operational conditions Recommend additional condition for one-off noise measurements to be undertaken by the consent holder to ensure compliance with the noise standards.	Refer to new Condition 88 addressing this requirement (refer to Attachment C).	
29	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part E – Operational conditions These conditions / changes are recommended due to past experience with monitoring quarrying activities in proximity to residential properties.	Noted, see above responses.	
30	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part F – Air Discharge Consent Conditions F2 – recommend removal of advice note. The enforcement officers do not need to be trained to determine if dust or odour is objectionable.	Advice note has been removed. Refer to updated consent conditions dated 12 August 2025, attached as Attachment C.	
31	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part F – Air Discharge Consent Conditions Recommend add condition that all	We've not included a condition requiring the continuous dust monitoring results to be submitted to Council on a quarterly basis.	

						continuous dust monitoring results be submitted to Council on a quarterly basis.	The proposed consent conditions are the same as the existing Drury Quarry existing air discharge consent in February 2023. Further, Auckland Council Air Quality Expert Ms Boamponsem has reviewed the application and confirms “the proposed air quality-related consent conditions below are appropriate to mitigate air discharge effects. They are consistent with the measures in the applicant’s existing air discharge consent and reflect good practice in managing dust and particulate emissions from quarrying activities (refer to Row 96).	
32	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part F – Air Discharge Consent Conditions Recommend add S128 review condition in case of adverse environmental effects from activity.	Review condition added at Condition 131. Refer to updated consent conditions dated 12 August 2025, attached as Attachment C.	
33	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part G – Groundwater Consent Conditions G7C - Recommend change Manager to Council.	Changed as requested.	
34	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part G – Groundwater Consent Conditions G10 – Recommend change Team leader to Council.	Changed as requested.	
35	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part G – Groundwater Consent Conditions G14 – Recommend change Manager to Council.	Changed as requested.	
36	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part G – Groundwater Consent Conditions G14 – Recommend Condition G1a be reported quarterly. All other reporting in section G to remain annually.	No amendment has been made to Condition G1a (now Condition 134(a). Quarterly reporting is not feasible, as groundwater inflow can only be reliably measured during dry summer conditions when there is no surface water runoff entering the pit. It is not possible to accurately measure groundwater inflow during winter or wet conditions.	
37	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part G – Groundwater Consent Conditions Recommend add S128 review condition in case of adverse environmental effects from activity.	We have added Condition 162 requiring a Section 128 review to the groundwater permit as requested.	
38	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part H – Monitoring and Annual Reporting Recommend changing annual reporting to quarterly (except for the groundwater monitoring and H6-H9).	No changes made to the frequency of reporting. Reporting requirements proposed are in consistent with Stevensons existing Drury Quarry’s consents.	
39	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part H – Monitoring and Annual Reporting Recommend separating quarterly, annual and 5 yearly monitoring reporting.	Refer to response in row 38 above.	
40	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part H – Monitoring and Annual Reporting H1 – Recommend change Manager to Team Leader Environmental Monitoring monitoring@aucklandcouncil.govt.nz.	Changed as requested.	
41	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part H – Monitoring and Annual Reporting H1 – Recommend quarterly reporting instead of annually.	Refer to response in row 38 above.	

42	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part H – Monitoring and Annual Reporting H1 – Recommend including air quality reporting.	Condition 69 (a) already requires all monitoring data required under the conditions of consent to be included in the Annual Monitoring Report. This includes all air quality monitoring data. Reporting of complaints or breach of air quality conditions or effects on the environment are required to be reported to the Council under the respective conditions. No changes made.	
43	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part H – Monitoring and Annual Reporting H3 – Recommend report to be submitted quarterly or as agreed with Team leader Environmental Monitoring. Also recommend that 15mm rain event be changed to 25mm or more and exclude surface flow aspect. Recommend condition includes how the rain event will be determined (i.e., an onsite rain gauge or the nearest Council rain gauge).	No changes made to the frequency of reporting (refer to responds in row 38 above). Condition 83(c) has been amended to refer to a rain event of 25 mm or more, excludes surface water flow, and includes a new condition (Condition 83 (d)) on rainfall measurement. We propose that rainfall be measured using the existing on-site rain gauge.	
44	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part H – Monitoring and Annual Reporting H9 – Recommend change reporting timeframe to 3 months after required monitoring dates.	No changes made to the frequency of reporting (refer to responds in row 38 above).	
45	Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	Part H – Monitoring and Annual Reporting Recommend adding a condition to implement a Community Liaison Group (CLG) for this stage as this section of the quarry will back onto residential housing. Past experience shows that this type of activity generates a lot of interest with neighbours.	At this stage, we consider that the existing engagement mechanisms remain appropriate. Stevenson has a dedicated Community Engagement person whose role is to ensure communication with neighbouring residents is maintained and any matters raised are appropriately addressed. Stevenson is committed to maintaining open lines of communication with neighbouring residents and will continue to respond proactively to any queries or concerns raised. Should the level of community interest increase over time, we would be open to revisiting the need for additional engagement measures, including a CLG, if appropriate.	
46	Colin Hopkins	Consents Planner	TBC	TBC	TBC	TBC	No response required	
47	Abhi Pandith	Development Engineer	No	No	Yes	Re Flooding and OLFP – DE to rely on comments from Healthy Waters and SWWWITA team.	No response required	
48	Abhi Pandith	Development Engineer	No	No	Yes	Geotech Report by Riley dated 14/01/2025, reviewed, the report provides detailed assessment of EW methodology, slope stability analysis and the requirement for monitoring the slope stability. Continuous monitoring will be beneficial for the day to operation and there will	No response required	

						be a negligible effect to any neighbors if followed as per the recommendations of Geotech report. Geotech specialist John Newsome also helped with the review of the report. Earthworks sediment control operations checked and reviewed and satisfies GD05 requirements and are good enough to address E12 triggers only.		
49	Abhi Pandith	Development Engineer	No	No	Yes	The traffic effects will be only on the public road will be delt by AT liaising directly with the planner and it is okay, internal traffic is upto Stevensons to operate efficiently and no issues for DE to check. Flooding and SW items will be assessed via the planner	No response required.	
50	Abhi Pandith	Development Engineer	No	No	Yes	Comment on Proposed Conditions Abhi is happy with the conditions proposed conditions but would like to add one more. All Earthworks operations must be supervised by a suitably qualified engineering professional. In supervising the works, the suitably qualified engineering professional must ensure that they are constructed and otherwise completed in accordance with Geotechnical Assessment report by Riley dated 14/01/2025, Certification from a suitably qualified engineering professional responsible for supervising the works must be provided to Council, confirming that the works have been completed in accordance with condition 5 within ten (10) working days following completion. Written certification must be in the form of a geotechnical completion report, or any other form acceptable to the council.	The recommended condition requiring supervision of “all earthworks operations” has not been included. In our view, this level of oversight is unreasonable. The Riley Geotechnical Report (Technical Report Q) does not recommend supervision of earthworks. Instead, it recommends that an observational-type method be adopted for the monitoring of construction works and the extraction of aggregates, which includes the use of trial batters and ongoing formal geotechnical assessments of the performance of cut slopes. This recommendation is covered under Conditions 29-30 requiring the preparation of a Slope Stability Management Plan that is to incorporate a formal annual geotechnical review of slope stability, trial batters in Waikato Coal measures, stormwater controls and groundwater regime and other specific matters.	Abhi has confirmed that he is happy with the response, and he agrees conditions 29-30 address the concerns he raised in his comments.
51	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	Based on my review of the ecological documents, a fully informed review of the ecological effects and management thereof cannot be made due to the following gaps in the information provided: <u>Terrestrial ecology</u> An assessment of how the altered water table will affect the success of existing and offset native biodiversity vegetation surrounding the pit.	YES	No		As set out in Sections 3.3 and 4.7 of PDP GW + SW report (Technical Report L), no drawdowns of shallow groundwater – which supplies water to the surrounding vegetation – is predicted. The zone of influence predicted by PDP relates to the regional groundwater system, not the shallow or perched groundwater. Predicted groundwater drawdowns are confined to the regional groundwater table, which is located well below and is hydraulically separate from the shallow groundwater table.	
52	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	<u>Terrestrial ecology</u> An understanding of how the outcomes will be secured through monitoring and adaptive management over the 30 plus year timeframes as the consent will be discharged once the covenants are secured in a much shorter period.	YES	No		The proposed consent conditions require long-term monitoring, maintenance, and adaptive management to ensure biodiversity outcomes are achieved. Conditions 100–112 require 30 years of monitoring for pioneer planting, with scheduled reviews at Years 5, 7, 10, 15, 20, and 30, and contingency actions if targets	

							are unmet. Pest and weed control is addressed under Conditions 113-116, requiring baseline and ongoing monitoring over 25 years, with progress reporting at key intervals. Detailed monitoring targets and methods are provided in the Residual Effects Analysis Report – Terrestrial Ecology (REAR-TE) prepared by Biosearches & JS Ecology (Technical Report C) and the Net Gain Delivery Plan for planting and pest/weed control (Technical Report F). Legal covenants over all enhancement areas will ensure protection of native vegetation in perpetuity and pest/weed control over at least 30 years. Given these enforceable conditions and perpetual covenants, the suggestion that “the consent will be discharged once the covenants are secured in a much shorter period” is not correct.	
53	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	Freshwater streams An assessment of the risks to existing covenanted offsets within the quarry zone/site, particularly downstream of stream 4. This should include, but not be limited to, a detailed monitoring and adaptive management plan to demonstrate how this offset (ecological values) will not be compromised by the proposed works.	YES	No		Any existing covenanted offset sites within the wider SAL wider landholdings will be required to be protected and maintained in accordance with the relevant resource consent conditions. Specifically, for the offset downstream of Stream 4, associated with the Northern Expansion of the Drury Quarry, Condition 32 of Consent BUN60325729 (LUC60325732 & LUS60325733) requires SAL to monitor the Stream Ecological Valuation (SEV) of the offset stream. This monitoring is to occur at five and ten years post-completion of instream enhancements and riparian planting, or until the predicted SEV values are achieved. Should monitoring indicate that the SEV value (0.7) is unlikely to be met or has not been reached within ten years of completion, a Further Enhancement Works Plan must be prepared and submitted to Council for approval within six months of the monitoring. Therefore, additional monitoring and adaptive management plans to demonstrate compliance with existing consent conditions are unwarranted. Furthermore, and in accordance with longstanding case law, Council must assume that the applicant will act legally and in compliance with the conditions of consent and the terms of the management plans.	

54	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	<u>Freshwater streams</u> The application material states that streams (stream 4) will be augmented to maintain flows, however, it is unclear how this will be achieved and assured in perpetuity.	YES	No		To maintain baseflows in Stream 4 from Stage 3 onwards, once potential drawdowns are predicted, clean water from the pit sump will be pumped up to a location just above the confluence of the Stream 7 and Stream 2 catchments, at the head of Stream 4. The proposed pit plan water management system, including this pumping system, is detailed in drawing ESCP-Sutton Blk-H20, attached to the Erosion and Sediment Control Report (Technical Report R). This drawing notes that as the pit develops, the pit pumps discharge location will move further upstream in consultation with the Freshwater Ecologist. The stream flow maintenance and recommended augmentation programme for Maketu and NT-1 Streams which includes Stream 4), is set out in the proposed consent Conditions 148 and 149. Condition 148 (a) requires augmentation if the flow at the Mangawheau monitoring station falls below 160 l/s. This augmentation will continue for as long as quarry dewatering results in drawdown effects.	
55	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	<u>Freshwater streams</u> The Ecological Impact Assessment (EclA) does not address how the loss of stream extent is managed through the effects management hierarchy - the proposal has a net loss in stream length (it is noted stream values are accounted for through the use of the Stream Ecological Valuation (SEV) method).	YES	No		There is a disagreement between experts on this point.	
56	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	<u>Freshwater streams</u> There are no details in the EclA for the culvert proposed on stream 4 or the diversion. It would be anticipated that details on the diversion stream such as instream structures that have been proposed, riparian planting in both long and cross section plans and SEV would be provided. In addition, culvert details and how fish passage will be achieved are also not noted.	YES	No		Proposed Consent Condition 11 requires submitting a Sutton Block Stream Diversion and Enhancement Plan to Auckland Council prior to commencement of construction. Condition 56 set out the requirements of this plan, which include outlining the construction and riparian planting details for the NT1 Stream, including the flow path, design drawings, construction methods and timing, and details of ecological enhancements like meanders, a low-flow channel, riffles, pools, boulders, and riparian planting. The culvert will be designed and installed to ensure fish passage for climbing species, as referenced in Section 5.3.6 of the EclA report. Refer to amended Condition 56.	
56a	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	<u>Freshwater streams</u> The culverts that are reported to be removed on the Peach Hill offset streams are not detailed or apparent in the offset.	YES	No		The Peach Hill offset site culverts proposed to be removed are all farm access culverts, that provide mostly complete, and rarely partial, barriers to fish passage. There	

							positions are illustrated in the drawing attached as Attachment D . Although the culverts will be removed, we did not reduce the quantum of offset required for the loss of potential for the operatively small length of the culverts at Peach Hill Road. This can be used as additionality.	
57	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	<u>Freshwater streams</u> The application material does not include the Stream Ecological Valuation (SEV) calculator in excel format.	YES	No		The SEV calculations for each of the 14 function categories are detailed in a series of Tables in Appendices B, C and D, of Document E5:9 Residual Effects Analysis Report: Stream and Wetland Offset (Technical Report D), followed by Appendix E: Assumptions for Calculation of Potential SEV Scores. The tables provide a detailed breakdown of the SEV data and the inputs to the methodology. A copy of these calculations in an excel format is considered unnecessary.	
58	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	<u>Freshwater streams</u> There is no streamworks management plan to provide detail on how and where the rock (and large wood) proposed to be installed in the streams as part of the offset of values will be undertaken.	YES	No		As stated in Section 5.3.3 of the EclA (Technical Report A), the diversion channel will be designed collaboratively with the project engineers and the project ecologists to provide a naturalised channel with meanders, variations in hydrology and large boulders, similar to the current stream reach, with no loss in current SEV values or stream length. The design drawings to be prepared and submitted as part of the Sutton Block Stream Diversion and Enhancement Plan (SDEP) must, among other things, illustrate ecological enhancements - such as riffles, pools and boulders – in accordance with proposed consent Condition 56(b). The effectiveness of a diversion channel was checked by the project engineer and ecologist. against a stream in a similar position that has been successfully diverted at Blemont Quarry. The detailed design is not currently available but will include design features similar to those in the E5:9 REAR Report Figure 13 (Technical Report D).	
59	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	<u>Wetlands</u> The assessment of potential values does not meet the assessment of values required under the NPS:F	YES	No		This response is based on the Compulsory Values set out in Appendix 1A of the NPS-FM for freshwater management units. Section 3.3 of the EclA sets out the current ecological values of the streams and wetlands. Section 5.3.2 of the EclA report sets out the stream and wetland potential value for aquatic habitats within the Sutton pit area assuming good land use practices within the current land use. The uplift in values considered include ecosystem health (Value 1 in Appendix 1A).	

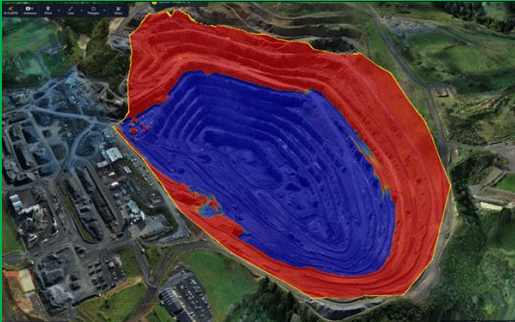
							Human Contact (Value 2 in Appendix 1A) is considered negligible. The impacted stream and wetlands are small non-swimmable streams located within an active quarry site. They do not support, or previous had the potential to support, recreational activities (such as boating, water skiing or swimming). Threatened species (Value 3) is considered in Section 3.4 of the EclA, as part of the assessment of assessing stream and wetland habitats and values. The only At-Risk species identified was the Longfin Eel, which has been considered in the potential value assessment. Mahinga kai (Value 4) has also been taken into account in Section 3.4 of the EclA report.	
60	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	<u>Wetlands</u> Wetland hydrology may be impacted for wetlands 2a south, 3 and 8 given the area of influence provided the Ground and Surface Water Report. An assessment for the potential loss of hydrology on these wetlands and adaptive monitoring is expected.	YES	No		The proposed dewatering is not expected to cause adverse effects on the hydrology of wetlands (refer to Section 3.3 and 4.7 and Figures 6 and 7 of Groundwater and Surface Water Report (Technical Report L). This is because the wetlands are sustained by shallow and perched groundwater systems that are hydrogeologically separate from the deep, regional greywacke aquifer proposed to be dewatered. The zone of influence relates only to the regional groundwater table in the greywacke. Potential effects on the shallow or perched groundwater are predicted to be limited to areas immediately adjacent to the pit, where shallow groundwater may be locally intercepted by quarry cuts along the footprint. Wetlands 3 and 8 are set back from the quarry footprint, therefore, no effects on these wetlands shallow groundwater systems are anticipated. Wetland 2a adjoins the southern extent of the wetland, and it's possible the pit excavation will intercept the shallow groundwater system. To mitigate the effects on Wetland 2a hydrology, an augmentation programme is proposed for Stream 4 and Wetland 2a (refer to Sections 9.9.3 and 9.97 of the AEE Report). In addition, ongoing assessment and monitoring of the hydraulic conductivity between wetland 2a and the upper portions of the pit slopes is proposed and required under consent Condition 30(d). This will inform setback adjustments or	

							groundwater barriers along the wetland's northern edge to mitigate dewatering of this wetland (refer to Section 9.3.2 of AEE report). In addition, shallow groundwater within and outside the quarry catchments will be monitored using 10 shallow piezometers (as outlined in Proposed Conditions Appendix 1: Schedule A Groundwater Monitoring Bores and Trigger Levels) to identify and mitigate any potential adverse effects on shallow groundwater and associated wetlands.	
61	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	<u>Offsets</u> There is uncertainty that the offsets are possible and meet additionality. Request evidence that the proposed offset sites are consistent with the additionality concept (eg. Letter from te Waikato River Authority and Hingaia Island has capacity as there are already numerous offsets consented at this location).	YES	No		Refer to Table 3, REAR-TE (Technical Report C) confirms no other parties have planned or committed to the proposed revegetation or enhancement actions at either offset sites: 1. Tuakau Site: Owned by Stevenson Aggregates Limited (Section 2.2.1.1.3, REAR-TE), with full control over proposed works. 2. Hingaia Island: Identified through iwi consultation as a priority for full revegetation (and with consideration to existing offset commitments for which we have coordinated with DoC and iwi on). Both sites therefore meet the additionality criterion, with documented ownership, absence of overlapping projects, and alignment with national biodiversity offsetting principles.	
62	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	<u>Why is this Information Essential?</u> The application involves the loss of habitat and biodiversity associated with freshwater features (streams and wetlands) as well as terrestrial vegetation. The assessment of the loss of values, both existing and potential are required: The National Policy Statement for Freshwater Management 2020 (amended October 2024 (NPS:F) provides, in the definitions, the loss of value in relation to rivers, and specifies the following existing or potential values: i. ecosystem health ii. indigenous biodiversity iii. hydrological functioning iv. Māori freshwater values v. amenity values The assessments do not provide a complete assessment for the above for the current and potential values.	YES	No		An assessment of the ecosystem health, indigenous biodiversity, hydrological functioning associated with the loss of habitat and biodiversity associated with freshwater features (streams and wetlands) as well as terrestrial vegetation is set out in Sections 3 and 4 of the EclA. An assessment of the Māori freshwater values is set out in Section 9.11.3 of the AEE report, based on the Cultural Values Assessment received at the time of drafting (refer to Table 9.1) and Appendix G of the AEE report. The amenity values have been assessed in Section 9.10.1 of the AEE report and in the Landscape Values Assessment report attached as Technical Report J.	

63	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	<u>Why is this Information Essential?</u> The application involves the loss of habitat and biodiversity associated with freshwater features (streams and wetlands) as well as terrestrial vegetation. The assessment of the loss of values, both existing and potential are required: The Auckland Unitary Plan E3.8.1 requires assessments of the effects on ecological, hydrological, recreational, cultural and natural character values (existing and potential) [emphasis added] of the lake, river or stream or wetland, and its catchment.	YES	No		Section E3.8.1 sets out matters of discretion for restricted discretionary activities. We are seeking consent for a non-complying activity. However, the matters of discretion are similar to the matters that require assessment under the NPS:F and that have been assessed throughout the EclA and accompanying Ecological Management Plan (Technical Report B), Residual Effects Analysis Reports (Technical Reports C and D) and Net Gain Delivery Plans (Technical Reports E-H) of the AEE report.	
64	Andrew Rosiak (Morphum)	Freshwater and Terrestrial Ecology	Require evidence to demonstrate that the diversion stream will not result in a loss of ecological values.	YES	No		A Sutton Block Stream Diversion and Enhancement Plan is proposed as Conditions 55 and 56. The objective of this plan is to detail the construction and riparian planting of the proposed stream diversion within the Sutton Block Site. This plan will include details on the construction methods, ecological enhancement measures, riparian planting and stream monitoring. Its implementation will ensure the diversion will not result in a loss of ecological values. Furthermore, and in accordance with longstanding case law, Council must assume that the applicant will act legally and in compliance with the conditions of consent and the requirements of the management plans.	
65	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	The NES:F and AUP require an assessment of value and extent (AUP 3.3.4 and NPS:F section 3.24: <i>the council is satisfied that:(i) the applicant has demonstrated how each step in the effects management hierarchy will be applied to any loss of extent or values of the river (including cumulative effects and loss of potential value), particularly (without limitation) in relation to the values of: ecosystem health, indigenous biodiversity, hydrological functioning, Māori freshwater values, and amenity; and....</i>	YES	No		Refer to response in row 55.	
66	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	Surface and groundwater report indicated an altered soil hydrology.	YES	No		Refer to response in row 60 above. The proposed dewatering is not anticipated to have any drawdown effects on the shallow or perched groundwater tables which support soil hydrology. Refer to Section 3.3 of PDP Groundwater and Surface Water Effects Assessment (Technical Report L).	
67	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	The SEV calculators are required to be reviewed to confirm that the SEV scores have been calculated and interpreted correctly. The concern being that the proposed enhancements may be overstating, or double counting, the benefits and therefore not reporting the correct level of effect.	YES	No		Refer to response in Row 57 above.	

68	Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	The AUP E15.8.2 (3) provides particular assessment criteria for Vegetation alteration or removal within a significant ecological area within a Special Purpose Quarry Zone, and effects management thereof, including <i>whether the scale or location of the activity will significantly affect water quality or quantity and the habitat value of waterways or wetlands</i> .	YES	No		E15.8.2 (3) set out the assessment criteria for restricted discretionary activities. While consent is being sought for a Discretionary Activity for vegetation clearance within SEA overlays both inside and outside the SPQZ, the matters listed for discretion have been broadly addressed in the Ecological Impact Assessment and associated reports (Technical Reports A-H). In relation to E15.8.2 (3)(d), an assessment of whether of SEA removal will affect water quality or quantity and habitat value of waterways or wetlands proposed to be reclaimed has not been undertaken, as these features will be permanently lost. However, the effect of this loss is proposed to be addressed as part of the comprehensive ecological offset package. The potential impact of SEA clearance on the water quality, quantity, and habitat value of <i>retained</i> waterways and wetlands has been assessed. Vegetation removal will be managed to avoid excess debris or sediment entering nearby waterways. An augmentation programme, including water quality monitoring, is proposed to maintain baseflows to streams and wetlands. In addition, riparian and wetland planting is proposed for the wetlands being retained within the Sutton Block site.	
69	Hillary Johnston	Stormwater, Industrial Trade Activity (SWWWITA team)	This specialist response identifies critical information gaps that prevent proper assessment of the activity and development proposal under the following subheadings: 1. Total Impervious Area 2. Stormwater Management Plan or Report 3. Sizing of the Sutton Block Pit Sump 4. Capacity of the Existing Drury Quarry Water Treatment System 5. ‘Clean Water’ Discharge to Stream 6. Industrial or Trade Activities 7. Water Quality Monitoring” TOTAL IMPERVIOUS AREA The application does not clearly state the total proposed impervious area to be established as part of the Sutton Block development, nor clarify whether this is limited to the haul roads or includes other features such as internal roads, vehicle parking, or processing areas. Why is this Information Essential? - Without this information, it is not possible to assess the likely stormwater runoff volumes or determine whether	No	No		Refer to responses in rows 70-75. The entire project area, for each stage, is considered impervious and has been designed accordingly. For example, is Stage 1, all haul roads and the initial pit (including internal roads within the pit) are treated as impervious. As the pit expands, each new area is also considered impervious. The rationale for this approach is explained in the responses provided in rows 70 –75.	Addressed, confirmed all project area has been considered impervious

			the water management system and treatment devices have sufficient capacity to manage and treat runoff over the life of the quarry. It also limits the ability to confirm the appropriateness of consent activity status identified under Chapter E8 of the AUP(OP).					
70	Hillary Johnston	Stormwater, Industrial Trade Activity (SWWWITA team)	STORMWATER MANAGEMENT PLAN OR REPORT The application does not include a standalone stormwater management plan or stormwater management report. Instead, relevant information in respect of stormwater management is dispersed across the AEE and supporting technical assessments. Why is this Information Essential? - The absence of a consolidated stormwater management plan or report limits the ability to clearly understand how stormwater will be managed across the various stages of the quarry, how dirty versus clean water is measured, monitored, and separated, the treatment standards applied, and how compliance with GD01/GD05 is achieved. A technical stormwater report or management plan would provide necessary clarity on water flow, device capacities, stormwater measurement and/or monitoring, and performance of proposed treatment devices.	No	No		The initial stages of the expansion (approximately 3 years) will be traditional earthworks operations with site runoff to be treated by GD05 compliant devices. Once the pit has been formed, all site runoff and water will fall back into the quarry pit, which has an abundance of storage. Once water is within the pit it will be managed and discharged by the existing consented stormwater system.	Section 6.1.1.6 and Section 6.2.2 of the AEE outline that ‘clean water’ will be pumped and discharge directly to Stream 4 – Please clarify In the absence of a standalone stormwater management plan or report, it is recommended that the Quarry Management Plan is updated to include information on the management and treatment of stormwater runoff.
71	Hillary Johnston	Stormwater, Industrial Trade Activity (SWWWITA team)	SIZING OF THE SUTTON BLOCK PIT SUMP The application does not include any technical explanation or hydraulic calculations to demonstrate how the Sutton Block pit sump has been sized in relation to predicted inflows from rainfall, stormwater runoff, groundwater dewatering, or water reuse demand. Why is this Information Essential? - Without a technical basis for the pit sump sizing, it is not possible to assess whether it has adequate capacity to capture and treat water during storm events or to prevent overtopping or uncontrolled discharges, particularly as the pit deepens over time. This limits confidence in the overall effectiveness of the water management system and the mitigation of downstream effects.	No	No		All dirty water from the Sutton Block is proposed to be pumped to the Drury Quarry Pit. As set out in Section 6.2.2 of the AEE and Section 2.6 of the ESCR, the existing Drury Quarry water is pumped from the pit via a turbidity-controlled pump. If the turbidity of the water being pumped exceeds the set limit, the system automatically shuts off, retaining the water within the pit until turbidity levels drop below the threshold and pumping can safely resume. Should water need to be removed from the pit while exceeding the turbidity limit, it will be pumped to the Drury Water Treatment System (lamella) for treatment before being discharged off site via the clean water pond. The Drury Quarry pit currently has approximately 9.1 million cubic metres of storage volume (Figure 1 below), which is more than sufficient to retain both stormwater and ground water inflow. The progressive nature of quarrying operations also means that the storage volume of the pit will continue to increase as the quarrying operation progresses. Based on the above, storage volume within the pit will not be an issue for all inflows and	Addressed. It is agreed that more than sufficient volume available within the Drury Quarry Pit to detain runoff before discharge to onsite treatment systems in times of high rainfall. It is recommended that the Quarry Management Plan is update to include processes or procedures for pumping to the Drury Quarry Pit , specifically in times of high rainfall that may exceed pump capacity, and during establishment phases of the Sutton Block Pit, where there may not yet be sufficient volume in the Sutton

							therefore additional calculations are not deemed to be necessary.  Figure 1: Drury Quarry Pit Storage Volume – approximately 9.1 million m³.	Block Pit to detain water before it is pumped to the Drury Quarry Pit.
72	Hillary Johnston	Stormwater, Industrial Trade Activity (SWWWITA team)	CAPACITY OF THE EXISTING DRURY QUARRY WATER TREATMENT SYSTEM While the AEE outlines that the existing Drury Quarry water treatment system (including the lamella and clean water pond) has ‘significant extra capacity’, it does not quantify this capacity or confirm how much of this capacity will be allocated to or consumed by the Sutton Block operations. Why is this Information Essential? - Without quantification it is unclear whether the Drury Water Management System can accommodate peak flows from both the existing and proposed quarry pits operating simultaneously (particularly during the crossover period), or during high rainfall periods. This introduces uncertainty in the ability of the existing Water Management System to provide mitigation simultaneously from both pits during any cross over period to avoid adverse effects on receiving waters.	No	No		The capacity of the existing Drury Quarry system is irrelevant as water within the pit is impounded and held as long as needed. Any discharges from the pit are controlled. The lamella is set at a pre-determined rate of discharge that never changes as the site team control the amount of water entering the lamella. All other water is held in the pit and controlled via turbidity controlled pumps.	Addressed. It is agreed that more than sufficient volume available within the Drury Quarry Pit to detain runoff before discharge to onsite treatment systems
73	Hillary Johnston	Stormwater, Industrial Trade Activity (SWWWITA team)	CLEAN WATER’ DISCHARGES TO STREAM The Application does not clearly identify any limits or restrictions on the volume, frequency, or rate of ‘clean’ water discharges from the Sutton Block pit or clean water pond into Stream 4 (NT1). The Application does not include an assessment of the hydrological or ecological effects of potentially large, sustained, ‘clean’ water discharges to the stream or the difference in flow regime compared to a natural, baseflow driven stream condition. Why is this Information Essential? - Without an assessment of whether discharge volume limits would be appropriate, or an assessment of the downstream effects of potentially large clean water discharges (including temperature, flow variability, erosion potential), it is not possible to determine whether the proposed discharges could cause erosion, alter downstream form or function, or affect aquatic habitat. Further analysis is required to support claims that the proposed discharges to the stream will not result in	No	No		Consent is sought for the discharge of groundwater and surface water into NT-1 stream as part of the proposed groundwater take and diversion permit sought. Pre-augmentation baseline monitoring of water temperature and dissolved oxygen, stream base flow, including rate of discharge of clean water to Stream 4 (NT-1) are proposed in Conditions 141-154. Discharges to lower reaches of the NT-1 stream associated with the existing Drury Water Management system and Lamella (including the clean water pond) are authorised under resource consent reference BUN60359817 and do not form part of this resource consent Application.	Addressed. Areas of concern appear to be sufficiently covered by proposed groundwater conditions.

			more than minor effects. While it may be considered that discharge of ‘clean’ water does not require restriction due to the net loss of streams and reduction of upstream catchment areas, this assumption overlooks the hydraulic differences between diffuse natural flows and concentrated point-source discharges.					
74	Hillary Johnston	Stormwater, Industrial Trade Activity (SWWWITA team)	INDUSTRIAL OR TRADE ACTIVITIES The Application does not identify whether any industrial or trade activities (ITAs) are proposed within the Sutton Block expansion area, nor does it confirm whether any discharges from existing or future ITA’s (e.g. concrete batching, perlite processing, or vehicle washdown) will occur within the catchment contributing to the new stormwater discharges. The application does not state whether additional ITA consents are sought for activities associated with the expanded quarry operations. Why is this Information Essential? - Without confirmation of whether there will be additional or expanded ITA’s it is not possible to determine whether the correct consents have been sought or whether appropriate mitigation and treatment measures have been proposed.	No	No		No ITA consent is sought as part of the Sutton Block application. Primary crushing will occur within the Sutton Block pit, with the crushed material then transported via a conveyor belt to the existing Front of House (FoH) area for further processing (as detailed in Section 4.3.2.1 of the AEE Report). The FoH is where a range of existing ITA facilities and activities are located, such as concrete batching, perlite processing and vehicle washdown stations which support the wider quarry operation (and the proposed Sutton Block). No changes to the FoH are proposed as part of this application. While processing (crushing) of rock is considered an industrial or trade process under Section 2 of the RMA, the proposed quarry pit (including primary crushing within it) is not considered an ‘Industrial or Trade Activity Area’ under the AUP. Therefore, no ITA consent is required as part of this application.	Confirmed all ITA activities will be undertaken within existing, consented FOH activity areas. Rock crushing is excluded from Table E33.4.3.
75	Hillary Johnston	Stormwater, Industrial Trade Activity (SWWWITA team)	WATER QUALITY MONITORING Description of Missing Information While the Application proposes conditions to monitor groundwater levels and quality, it does not propose any conditions to monitor the quality of other discharges from the site or to monitor water quality within the receiving environment (i.e. Stream 4/NT1). There is no monitoring framework or subsequent trigger-response approach proposed. Why is this Information Essential? - Without conditions requiring water quality monitoring at discharge points and within the receiving environment, there is no mechanism to verify that discharge quality remains consistent with the Application and associated assessments. There is no mechanism to detect and respond to potential adverse effects over time. Monitoring is particularly important given the large-scale earthworks, proposed stream reclamation, and sustained discharges of both treated and untreated water from the pit system.	No	No		The existing Drury Quarry water treatment system has been set up and is managed in a manner that allows discharges to be controlled. If turbidity within the pit was poor, the water is simply held in the quarry pit prior to discharge to the lamella and off site. For the stage 1 works (the traditional earthworks stage and where GD05 SRP and devices will be used), Turbidity standards on SRPs should not be imposed as the devices operate on an efficiency system. Turbidity standards are not any “standard”GD05 SRP’s in any project in Auckland. GD05 design cannot guarantee a standard. Auckland Council knows this and that is why a turbidity standard is not specified. Stage 1 will take approximately 3 years. After Stage 1 all construction water is managed via the pit and will be controlled via turbidity controlled pumps.	It is not suggested to monitor the turbidity of SRP discharges. Monitoring of the quality of discharges from the site and specifically of water quality within the receiving environment (i.e. Stream 4/NT1) would be useful in determining the effects of the activity. Upstream and downstream monitoring for water quality, including turbidity, pH, and TSS are common on other quarry consents within the Region.

76	Philip Kelsey	Groundwater and dewatering	<u>A - Regional Groundwater Drawdown Predictions</u> Missing Information Stage 5 maximum groundwater drawdown contours within the 7.5 kilometre zone of influence, incorporating cumulative drawdown effects from consented Drury and Hunua quarries. Why is the Information Essential? The requested information is required to determine the effects on existing groundwater bores and streams, plus verification of proposed monitoring for groundwater and surface water.	No	No		Refer to Groundwater Memorandum dated 12 August 2025 attached as Attachment E .	Supplementary Request for Missing Information contained within Philip Kelsy memo dated 22.8.2025
77	Philip Kelsey	Groundwater and dewatering	<u>A - Regional Groundwater Drawdown Predictions</u> Missing Information A plan showing all stream reaches expected to be subject to baseflow reduction associated with Stage 5 groundwater drawdowns, including cumulative effects from Drury and Hunua quarries. (Please show on plans at a suitable scale. The 1:70,000 scale drawings provided are very difficult to read.)	No	No		Refer to Groundwater Memorandum dated 12 August 2025 attached as Attachment E.	Philip has confirmed that s67 query has been adequately addressed by Figure S1 of PDP (2025b).
78	Philip Kelsey	Groundwater and dewatering	<u>B - Groundwater Drawdown and Ground Settlement</u> <u>West of Drury Fault</u> Missing Information Assessment of potential groundwater drawdown and ground settlement effects west of the Drury Fault from expected deep greywacke drawdown to RL-55m within the adjacent Hunua and Drury greywacke blocks. Why is the Information Essential? - Closest ground conditions which are prone to groundwater drawdown related settlement consist of compressible Tauranga Group sediments which are extensive under the Drury Flats. Significant development has taken place in this area. - Figures 6 and 7 of PDP (2025) 1 PDP (2025). Proposed Sutton Block Expansion – Groundwater and Surface Water Effects Assessment. Report prepared for Stevensons Aggregate Limited. March 2025. show predicted Hunua and Drury greywacke block drawdowns to RL-55m, significantly below Drury Flats groundwater levels to the west of the Drury Fault. Such drawdowns could result in leakage across the buried Drury Fault scarp. Figures 6 and 7 of PDP (2025) show the Drury Fault as a linear feature bounding the greywacke block geology to the ground surface. This is a buried fault scarp that may have been subject to past	No	No		Refer to Groundwater Memorandum dated 12 August 2025 attached as Attachment E.	Philip has confirmed that s67 query has been adequately addressed by PDP (2025b).

			erosion resulting in local removal of the Hunua Fault barrier.					
79	Philip Kelsey	Groundwater and dewatering	<u>B - Groundwater Drawdown and Ground Settlement West of Drury Fault</u> Missing Information Groundwater level monitoring west of the Drury Fault. Why is the Information Essential? - Closest ground conditions which are prone to groundwater drawdown related settlement consist of compressible Tauranga Group sediments which are extensive under the Drury Flats. Significant development has taken place in this area. - Figures 6 and 7 of PDP (2025)1 1 PDP (2025). Proposed Sutton Block Expansion – Groundwater and Surface Water Effects Assessment. Report prepared for Stevensons Aggregate Limited. March 2025. show predicted Hunua and Drury greywacke block drawdowns to RL-55m, significantly below Drury Flats groundwater levels to the west of the Drury Fault. Such drawdowns could result in leakage across the buried Drury Fault scarp. Figures 6 and 7 of PDP (2025) show the Drury Fault as a linear feature bounding the greywacke block geology to the ground surface. This is a buried fault scarp that may have been subject to past erosion resulting in local removal of the Hunua Fault barrier.	No	No		Refer to Groundwater Memorandum dated 12 August 2025 attached as Attachment E.	Philip has confirmed that the six monitoring bores west of the Drury Fault, as listed in Table 1 of PDP (2025b), are considered appropriate. s67 query has been adequately addressed by PDP (2025b).
80	Philip Kelsey	Groundwater and dewatering	<u>C - Groundwater Supply Bores</u> Missing Information Specific assessment of in-well drawdown effects (incorporating pump depths and water supply demands) on existing water supply bores within the zone of influence. Why is the Information Essential? - Predicted groundwater drawdown on existing water supply bores is high and up to 120m. Existing PDP bore effects assessment based on predicted groundwater drawdown and bore depths only. This is insufficient to assess quarry drawdown effects on existing bore owners. - Existing bore database presented in Appendix H includes many investigation bores which are not water supply bores, and possibly many that are no longer used. These need to be removed.	No	No		Refer to Groundwater Memorandum dated 12 August 2025 attached as Attachment E.	Supplementary Request for Missing Information contained within Philip Kelsy memo dated 22.8.2025
81	Philip Kelsey	Groundwater and dewatering	<u>C - Groundwater Supply Bores</u> Missing Information	No	No		Refer to Groundwater Memorandum dated 12 August 2025 attached as Attachment E.	Supplementary Request for Missing Information

			Identification of potentially affected water supply bore owners, including those with consented takes. Why is the Information Essential? - Predicted groundwater drawdown on existing water supply bores is high and up to 120m. Existing PDP bore effects assessment based on predicted groundwater drawdown and bore depths only. This is insufficient to assess quarry drawdown effects on existing bore owners. - Existing bore database presented in Appendix H includes many investigation bores which are not water supply bores, and possibly many that are no longer used. These need to be removed.					contained within Philip Kelsy memo dated 22.8.2025
82	Philip Kelsy	Groundwater and dewatering	<u>D - Augmentation Flow Water Quality</u> Missing Information Water treatment standard for stream augmentation from groundwater. Confirmation of treatment to achieve ANZECC 95% Ecosystem Protection Levels. Why is the Information Essential? Table 9 (PDP, 2025) shows Sutton Block deep greywacke groundwater exceeds ANZECC 95% triggers for nitrate and metals. Water treatment of groundwater is mentioned in PDP (2025) but not specified.	No	No		Refer to Groundwater Memorandum dated 12 August 2025 attached as Attachment E.	Philip has confirmed that s67 query has been adequately addressed by PDP (2025b).
83	Philip Kelsy	Groundwater and dewatering	<u>E - Stream Augmentation – Cumulative Effects</u> Missing Information Clear methodology in determining the cause of baseflow reduction in terms of Hunua or Sutton Block quarries for Hays and Symonds Streams. Why is the Information Essential? PDP (2025) for the Sutton Block Expansion estimates loss of baseflows of 1,747m³/d for Hays Stream and 708m³/d for Symonds Stream. Both of these streams are monitored by Winstones as part of the Hunua Quarry consents. Methodology requested to determine cause of baseflow reduction and partly responsible for mitigation.	No	No		Refer to Groundwater Memorandum dated 12 August 2025 attached as Attachment E.	Philip has confirmed that s67 query has been adequately addressed by PDP (2025b).

84	Philip Kelsey	Groundwater and dewatering	F - Post Quarrying Augmentation of NT1 Stream Missing Information Proposed post-quarrying mitigation of loss of baseflows to NT1 Stream as a result of greywacke aquifer removal from quarry excavation within catchment. Why is the Information Essential? PDP (2025) estimates the total loss of baseflows to the NT1 Stream as a result of quarrying is 474m³/d. While augmentation is proposed during quarry operations from quarry sump pumping, no post-quarrying mitigation is provided.	No	No		Refer to Groundwater Memorandum dated 12 August 2025 attached as Attachment E.	Philip has confirmed that s67 query has been adequately addressed by PDP (2025b).
85	Sharon Tang	Contamination	No	No	Yes	Specialist Assessment. The preliminary site investigation (PSI) comprises of a review of historical aerial photographs, available geology and hydrology maps, Auckland Council property files and Contamination Enquiry Response, interviews and a site walkover. It has identified that the site has been subjected to the following (potential) HAIL activities: • Potential sheep dip and spray race operations (HAIL A8) • Progressive deterioration or active disturbance/maintenance of aged buildings or uncontrolled demolition of historical structures, containing lead-based paint and/or asbestos containing material (ACM) (HAIL I, HAIL E1)	No response required	

86	Sharon Tang	Contamination	No	No	Yes	Specialist Assessment. The detailed site investigation (DSI) and the Soil Characterisation Investigation (SCI) show: - A total of 23 surface soil samples and 12 near-surface samples (0.2m - 0.3m) were collected on 9 Jan 2022 from the buildings' halo and the potential spray race/sheep dip area and selected samples were analysed for heavy metals, organochlorine pesticides (OCPs) and semi-quantitative asbestos (where deteriorated ACM noted) (DSI); - Surface and sub-surface soil samples (up to 0.3m bgl) were also collected in February 2022 from 20 grid locations across the wider site with selected 20 soil samples being analysed for heavy metals, OCPs and PAHs (SCI); - The DSI shows elevated lead concentrations recorded in 8 of the 11 analysed surface soil samples collected from the building halos above the Auckland background value for non-volcanic soils. Of which, two lead concentrations exceeded the AUP-OP permitted activity soil acceptance criteria specified in Table E30.6.1.4.1. Asbestos fines were absent in the sample analysed. - The CSI concluded that the surface and near-surface materials located at the Sutton Block Drury complied with the AUP-OP 'Cleanfill' definition (only one sample was recorded heavy metals above the Auckland background ranges);	No response required	
87	Sharon Tang	Contamination	No	No	Yes	Specialist Assessment. The CSMP/RAP has identified the two areas containing lead impacted soil over the AUP-OP permitted activity soil acceptance criteria (Figure 1). The plan proposes to excavate the two remediation areas to natural ground (0.1-0.3m bgl) for offsite disposal followed by validation inspections and sampling. Although the CSMP/RAP has not estimated the volumes of the soil requiring remediation or management, the quantities appear to be relatively small;	No response required	

88	Sharon Tang	Contamination	No	No	Yes	Specialist Assessment. The DSI/RAP has specified the roles and responsibilities, set up remediation and validation procedures, site management controls for sediment, erosion and stormwater, dust, stockpiling, re-use of site soils, offsite disposal, importation of fill, health and safety, and response procedures to unexpected discovery of contamination; ➤ 3.1 I consider that the PSI, DSI supplemented with the CSI, and the CSMP/RAP have in general been undertaken in accordance with the requirements of <i>Contaminated Land Management Guidelines No. 1 and 5</i>. The PSI has identified the potential HAIL activities on the Site. The DSI and the CSI indicate that the extent of soil contamination is limited to the halos of the site buildings/structures. ➤ 3.2 Based on the limited lead contamination around the buildings' halos over the and the AUP-OP permitted activity soil acceptance criteria, I consider that CSMP/RAP has taken a conservative approach to remediate the lead impacted soil through offsite removal. Since the volume of impacted soil is likely to be well below the permitted 200m³, re-use of the soil together with other soil containing low levels of contaminants is likely to be acceptable. ➤ 3.3 I concur with the DSI and the AEE that since the DSI shows contaminant concentrations in the soil on a piece of land above the published background concentration but below the applicable NESCS standard in Regulation 7 of the NESCS, the proposed soil disturbance and changing use of the piece of land trigger a controlled activity pursuant to Regulation 9 of the NESCS. ➤ 3.4 I concur with the DSI and the AEE that the proposed earthworks can be undertaken as a permitted activity pursuant to rule E30.4.1 (A4) since the permitted activity Standards E30.6.1.2 are likely to be met. ➤ 3.5 I consider that by implementation of the CSMP/RAP, and the recommended consent conditions, any potential health and environmental effects from the proposed earthworks can be	No response required	
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						appropriately mitigated to an acceptable level.		
89	Sharon Tang	Contamination	No	No	Yes	Comments on Proposed Conditions I have reviewed the Proposed Conditions relevant to the NESCS consent. The proposed C2 requires a CSMP (C7) and RAP (C7) to be submitted to the Council for certification. Since the CSMP/RAP has already been submitted and certified, it is recommended to remove the CSMP and RAP from the list under C2 together with the removal of the proposed C7.	Have updated conditions to remove requirement for the CSMP and RAP to be submitted to Council for certification.	Sharon has reviewed the draft conditions vision dated: 12 August 2025 with reference to her tech memo. She noted that her recommendations on previous draft conditions in her memo have been fully adopted and a new draft condition 76 and

								advice note are added. These changes are accepted and agreed to.
90	Sharon Tang	Contamination	No	No	Yes	Comments on Proposed Conditions There is a lack of conditions for implementation of certified plans. I, therefore, recommend the following condition: Condition xxx: Earthworks involving contaminant impacted soil must be conducted according to the <i>Updated- Sutton Block Expansion to Drury Quarry – Contaminated Site Management Plan and Remedial Action Plan (T+T, January 2024) (CSMP/RAP)</i>; Any significant variation to the CAMP/RAP must be submitted to the Council for review and certification that it appropriately manages actual and potential soil contamination effects and is within the scope of this consent, prior to implementation; Advice Note: Asbestos Containing Materials • <i>If you are demolishing any building that may have asbestos containing materials (ACM) in it:</i> • <i>You have obligations under the relevant regulations for the management and removal of asbestos, including the need to engage a Competent Asbestos Surveyor to confirm the presence or absence of any ACM.</i> • <i>Work may have to be carried out under the control of a person holding a WorkSafe NZ Certificate of Competence (CoC) for restricted works.</i> • <i>If any ACM is found, removal or demolition will have to meet the Health and Safety at Work (Asbestos) Regulations 2016.</i> • <i>Information on asbestos containing materials and your obligations can be found at www.worksafe.govt.nz</i> <i>If ACM is found on site following the demolition or removal of the existing buildings you may be required to remediate the site and carry out validation sampling.</i>	A new earthworks Condition 76 has been included as requested.	Sharon has reviewed the draft conditions vision dated: 12 August 2025 with reference to her tech memo. She noted that her recommendations on previous draft conditions in her memo have been fully adopted and a new draft condition 76 and advice note are added. These changes are accepted and agreed to.

91	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Potential Air Quality Effects The primary air quality concern associated with the proposed Sutton Block expansion is dust generation, particularly TSP, PM₁₀, and respirable crystalline silica (RCS). Key dust-generating activities include: • Earthworks and overburden removal (e.g., wind erosion from exposed surfaces, stockpiles, and material loading) • Aggregate extraction and blasting (release of fine and coarse particulates) • Haul road traffic (dust entrainment from unsealed surfaces) • Portable crushing operations (if deployed on site) Under worst-case, unmitigated conditions, coarse dust could disperse several hundred metres—especially during strong south-westerly winds—potentially affecting nearby sensitive receptors such as residential properties on Macwhinney Drive (R1 and R2, approximately 130–300 m downwind) and the culturally significant Kaarearea pā site (R4, approximately 80 m downwind). Finer PM₁₀ particulates are expected to disperse over a wider area but remain below health-based thresholds beyond approximately 200 m. The assessment acknowledges adjacent industrial sources but does not model cumulative particulate impacts from Drury South or other nearby operations.	No response required	
92	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Summary of Potential Air Quality Effects: • Short-term impacts during initial overburden stripping and bund construction pose the greatest risk, particularly to R2 and R4. • Cumulative effects from concurrent Sutton Block and Drury Quarry operations may increase dust events at R4, though such events are unlikely to occur simultaneously. • Health risks from PM₁₀ and RCS are predicted to remain within acceptable thresholds (e.g., RCS ≤ 2.8 µg/m³, below the 3 µg/m³ guideline).	No response required	
93	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Proposed Mitigation Measures SAL proposes to adopt a detailed Dust Management Plan (DMP) for the Sutton Block, modelled on the controls successfully implemented at the existing Drury Quarry site. Key mitigation measures include: • Water carts and fixed sprays on haul roads, stockpiles, and exposed surfaces, with conditioned use during dry and/or windy periods • Enforced vehicle speed limits of 30 km/h to minimise entrainment	No response required	

						- Progressive bunding and re-vegetation of overburden mounds within three months of placement - Real-time PM₁₀ monitoring, integrated with telemetry and response triggers - Annual DMP review to incorporate adaptive management and industry best practices Provided that crushing activities remain confined to the existing fixed plant area, the residual risk of dust impacts on downwind receptors is expected to be minor and manageable.		
94	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Regulatory Compliance The proposed activity demonstrates good alignment with applicable regulatory requirements: - The proposal meets Auckland Unitary Plan (AUP) standard E14.6.2.2 (minimum 200 m setback for crushing operations) and complies with the Quarry Buffer Overlay provisions. - Predicted PM₁₀ concentrations (22.6–45.1 µg/m³) are below the National Environmental Standards for Air Quality (NESAQ) 24-hour threshold of 50 µg/m³. - The assessment applies the FIDOL framework (Frequency, Intensity, Duration, Offensiveness, Location) consistent with the MfE Good Practice Guide for Assessing and Managing Dust (2016).	No response required	
95	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Conclusion The air quality assessment for the proposed Sutton Block expansion indicates that: - The existing receiving environment is well understood and compliant with regulatory standards; - The potential for adverse air quality effects—particularly from dust—is largely confined to early stages of site development and can be effectively mitigated; - The proposed mitigation measures reflect best practice and are suitable to be incorporated into enforceable consent conditions; - With appropriate implementation and ongoing monitoring, the air discharge effects of the expansion are expected to remain minor and well-controlled. In view of the above assessment, I support the application.	No response required	
96	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Comment on Proposed Conditions The proposed air quality-related consent conditions below are appropriate to mitigate air discharge effects. They are consistent with the measures in the applicant's existing air	No response required	

						discharge consent and reflect good practice in managing dust and particulate emissions from quarrying activities.		
97	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Part F – Air Discharge Consent Conditions F1 Limit Conditions All processes must be operated, maintained, supervised, monitored and controlled, including by adhering to the Dust Management Plan certified in accordance with the conditions of this consent, to ensure that all emissions authorised by this consent are maintained at the minimum practicable level.	No response required	
98	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Part F – Air Discharge Consent Conditions F2 Beyond the boundary of the site, there must be no dust caused by discharges from the Site which, in the opinion of an enforcement officer when assessed in compliance with the Good Practice Guide for Assessing and Managing Dust (Ministry for the Environment 2016), causes noxious, dangerous offensive or objectionable effect. Advice Note: Dust effects Compliance with this condition is to be assessed by suitably trained council enforcement officers in accordance with the procedures outlined in the Good Practice Guides for Odour and Dust (Ministry for the Environment, 2016), including consideration of the FIDOL factors (frequency, intensity, duration, offensiveness and location).	No response required	
99	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Part F – Air Discharge Consent Conditions F3 Discharges from any activity occurring on the Site must not give rise to visible emissions, other than water vapour or heat haze, to an extent which, in the opinion of the council, is the cause of a noxious, dangerous, offensive or objectionable effect.	No response required	
100	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Part F – Air Discharge Consent Conditions F4 Beyond the boundary of the Site, there must be no hazardous air pollutant caused by discharges from the Site, which is present at a concentration that causes, or is likely to cause adverse effects to human health, ecosystems or property.	No response required	
101	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Part F – Air Discharge Consent Conditions F5 No crushing activities must occur within 200 m of 359 MacWhinney Drive, within the area demarcated purple on Figure 7 of the ‘Sutton Block – Air Quality Assessment’ prepared by Pattle Delamore Partners Ltd, dated March 2025 and shown in Figure 1 below. Figure 1: 200 m crushing exclusion area within the Project’s footprint.	No response required	

102	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Part F – Air Discharge Consent Conditions F6 The crushers must not be operated without the associated water sprayers being fully operational and functioning correctly. All dust control equipment on the Site must be maintained in good condition.	No response required	
103	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Part F – Air Discharge Consent Conditions F7 All practicable measures must be undertaken as detailed by the DMP, certified in accordance with the conditions of this consent, to minimise the discharge of dust beyond the boundary of the site. These measures must include, but not be limited to: (a) Frequent watering of unsealed surfaces where discharges of dust are likely to arise; (b) Restricting vehicle speeds around the site; (c) Maintaining unsealed surfaces of vehicle routes where discharges of dust are likely to arise through grading and rolling to minimise dust, and stabilisation of exits from unsealed surfaces onto sealed roads; (d) The maintenance of wheel washing facilities at the site exit, utilised by vehicles as required to minimise the tracking of dust-generating material on paved surfaces and public road; and. (e) Locating and maintaining stockpiles to minimise potential wind-entrainment. (f) Contouring and re-vegetation of the overburden and managed fill disposal area as soon as practicable.	No response required	
104	Louis Boamponsem	Air Quality / Discharge	No	No	Yes	Part F – Air Discharge Consent Conditions F8 Water supplies must be maintained at such capacity that application of water as a dust control measure is not limited.	No response required	
105	Bin Qiu	Noise & Vibration	Description of Missing Information The blasting activity may not be included in the applicant's noise assessment report, as this activity does not appear in MDA report and its noise data of quarry equipment listed in Appendix B. Why is this Information Essential? Blasting can generate significant noise and vibration, which are likely to be the highest level of noise and vibration for the proposed quarry operations, without the assessment, it will be difficult to determine the compliance with the relevant standards and to evaluate its effects and the appropriateness of the proposed mitigation/management measures.	No	No		No response required	Bin has provided a memo dated 20.8.25 where he states he has reviewed the revised draft conditions and provided comments re conditions 88 and 91, including recommended amendments
106	Mica Plowman	Heritage / Archaeology	No	No	Yes		No response required	
107	Shanelle Beer Robinson	Regional Earthworks	Description of Missing Information Significant Ecological Areas are mentioned in the reports and earthworks plans shown within close proximity to the SEA overlay on Geomaps. Per	Yes			Consent is sought under Rules E11.4.3(A28) and E11.4.3 (A30) for earthworks greater than 5m ² and 5m ³	Shanelle has advised that she considers that her original queries have now

			11.8.2(1)(d), the earthworks plans should be updated to clearly specify the proximity/set-back from the SEA and management practices i.e. fencing/exclusions zones or otherwise apply for the necessary consents under E11.4.3(A28) and (A30) if earthworks greater than 5m2 and 5m3 are proposed in the SEA. Why is this Information Essential? To understand the potential impacts of the earthworks activity on the SEA environment Per 11.8.2(1)(d), – and whether additional reasons for consent are required under Chapter E11.				within an SEA. Refer to Table 8.2 in the AEE Report.	either been addressed or can be deferred to consent conditions.
108	Shanelle Beer Robinson	Regional Earthworks	Description of Missing Information There is a lack of information regrading soil compaction methods and minimisation, specifically in relation to the haul roads, overburden bunds and stockpiles per E11.8.2(1)(c) and should be updated within the earthworks report. Why is this Information Essential? To understand how features of the ESC operation (haul roads, stockpiles) where soil compaction can occur and cause adverse effects such as reduced permeability and increased sediment-discharges per E11.8.2(1)(c).	Yes			This is an irrelevant question to this application. The haul roads, stockpiles and overburden bunds will eventually all end up within the footprint of the quarry pit, i.e., are temporary in nature. Soil compaction does not increase sediment discharges. Any potential permeability issues as mentioned above will be in an area that will become the future pit. The proposal is designed for all runoff to fall to the quarry pit which has lots of capacity, is a fully closed and controlled system that will be treated via a lamella.	Shanelle has advised that she considers that her original queries have now either been addressed or can be deferred to consent conditions.
109	Shanelle Beer Robinson	Regional Earthworks	Description of Missing Information The Erosion and Sediment Control Plans are missing some key detail to be considered in accordance with GD05. - All SRP, DEBs and Diversion Bunds/Channels must clearly have design details such as catchment area, volume, shape, storage, dimensions etc. - The plans do not clearly show the stabilised entrance/exit points for haul roads and the haul roads do not have erosion or sediment controls. - The plans do not illustrate the temporary vs permanent erosion and control features between stages. - Some plans have emergency spillways and outfalls shown for devices but there are no detailed designs showing cross-sections, materials, erosion protection etc. - Clear stipulation of maximum open area per stage should be added to the ESCP to demonstrate total exposed area per stage (ha) with colour-coded clear open vs stabilised areas. Why is this Information Essential? GD05 is a benchmark standard in the AUP and	Yes			This list of missing information is not accurate. All bunds have been sized for the maximum catchment area which will be used as the minimum bund size across the site. Sizing details have been included in Appendix C of the ESCP Report as well as noted on the provided drawings/plans. Whilst not specified on the plan, DEB-1 and DEB-1B will be the same size as DEB-NWH-1. Schematics of the ESC measures have therefore been provided for each device proposed on site. The comment that the haul roads do not have ESC measures is incorrect. Haul roads are entirely within the catchment areas of the proposed ESC measures as shown on the provided plans. Staging of the works is clearly shown using colour coding on the plans provided. Strip areas have been shown in purple and the areas to be progressively stabilised are shown in yellow as shown on Drawings ESCP-DQSB-02 through to ESCP-DQSB-10. As the pit is formed and the over burden removed the surface becomes a raw aggregate, stabilised surface. This is	Shanelle has advised that she considers that her original queries have now either been addressed or can be deferred to consent conditions.

			failure for plans to be prepared in general accordance (beyond what can be conditioned as a finalised ESCP can result in a risk of device failure or poor performance. Poor device construction, monitoring and maintenance can lead to increased sediment discharges to waterbodies and sensitive receiving environments.				clearly described in the report. The Stage 1 strip areas are all detailed on the plans. Note Stage 1 is the stage that could be regarded as traditional earthworks. The emergency spillways are all sized in the schematic drawings. The report states and confirms that the devices will be constructed in accordance with GD05. GD05 specifies spillway materials.	
110	Shanelle Beer Robinson	Regional Earthworks	Description of Missing Information There is a missing standalone Adaptive Management Plan for the earthworks. Adaptive Management is critical for large land disturbance proposals and where there are sensitive freshwater receiving environments. As part of an AMP, the following information would be required to understand how the works will be undertaken to ensure targeted responses can be achieved. The following is a high-level expectation as part of the AMP: - Hydrological baselines; including existing flow regimes and water quality with pre-works turbidity, TS, pH and ecological baselines (aquatic life, habitat, existing values of streams). - Receiving environment details: ecological value downstream and sensitivity to hydrological inputs, sediment yield susceptibility, set-back/buffering. - Monitoring Plan: identification of discharge points, frequency of sampling (manual / automatic at devices) and in-stream automated, parameters to be measured (TSS, turbidity, visual assessments, flow rates) - Trigger thresholds – agreed limits and rainfall data (rainfall gauge on site?) and trigger responses, responsibilities, corrective actions. Contingency actions for adverse weather, high turbidity readings or device failures. - Monitoring data and evaluation methods – comparisons between baseline data or trigger levels. Data reviews and reporting timelines. - Long-term discussion regarding how the erosion and sediment control design will be adapted to climate change/variability (i.e. more frequent storm events and/or intense rainfall) over 50 years. - Approach to managing exceedances, device failures or high turbidity discharges. The AMP should include pre-determined trigger	Yes			Bulk earthworks are limited to the first 3 years of development over a 2-4ha area, which in scale is comparable to a small earthworks site. It has been designed for all site water from Stage 3 onwards to go to the pit where it is treated by an advanced water treatment system (lamella). Based on this reasoning and the further information provided below, we do not think an adaptative management plan is needed nor beneficial for the proposed work. Please explain what you would want to achieve out of Adaptive Management Plan. Once the pit has been formed the rain events will become irrelevant. All water can be held on site with discharges controlled by an advanced water treatment system. The Auckland Council AMP guidance states the following: “<i>Adaptive management should be the exception not the norm, applying to the most significant scale works or specifically sensitive receiving environments. Most consents granted should be based on a well-understood scale of effects and appropriate management systems.</i>” <i>A significant risk with the adoption of an AMP is that it masks what is simply best practice site management that is required to maintain consistency with GD05 and any other relevant consent conditions, and that the AMP becomes the primary mechanism for implementing and monitoring site management by the contractor and Council. An AMP should be based on additional measures and for that reason, the requirement for an AMP is recommended to be limited to the most</i>	Shanelle has advised that she considers that her original queries have now either been addressed or can be deferred to consent conditions.

			thresholds – i.e. NTU exceedances, how devices will be rectified and upgraded or additional devices installed. - How and when data is reported to Auckland Council or retention of monitoring/data recording. Please define when and how Council will be alerted. - Criteria for escalating responses – e.g. stop works, immediate stabilisation, re-design of controls etc. - Specific consent conditions relating to Adaptive Management Plan certification, monitoring and responses. Why is this Information Essential? AMPs provide large earthworks projects and Council the opportunity to ensure that sediment generation is minimised and provides real-time monitoring and reporting tools. Given the 50-year term sought, the AMP as a live document will provide for a useful compliance tool but must have the correct thresholds and approaches prior to adoption.				significant and / or long-term earthworks activities.”	
111	Shanelle Beer Robinson	Regional Earthworks	Description of Missing Information There is key missing information in relation to the streamworks. The earthworks report should be supported with a Streamworks Management Plan in accordance GD05. Currently there is: - No clear methodology for how streamworks will be undertaken in a way that avoids sediment discharges and minimises channel disturbance i.e. channel diversions, culvert removal, dam dewatering, stream realignment etc. Requires further information for working within a watercourse – i.e. coffer dams, pumps or sandbags, dewatering (screening), sediment control for stream bed/banks, timing and duration of works etc. - There are no details relating to native fish capture and relocation. - There is mention of offline constructed channels but no design detail such as lining, profiles, armouring at inlet/outlet. Why is this Information Essential? Streamworks Methodology Plans are crucial when there are in-stream works required to demonstrate how works will be undertaken in a way that minimises sediment discharges, provide for fish salvage and monitoring as expected by GD05, E3 and the NESF.	Yes			There is a construction methodology specifically relating to stream diversion and streamworks provided in the ESCP (Drawing ESCP-DQSB-01 and in Sections 2.4 and 4.1 of the ESC Report), including the size of the stream diversion channel. As per Section 3.5 of the ESC Report, the document will be reviewed and is a live document meaning additional/specific detail such as dam construction/construction methodologies and stabilisation details, will be and can be provided through the submission of an updated ESCP when required. The permanent culvert will need to be sized and designed as part of detailed design. This would form part of final information for the stream to be submitted prior to works as required under consent Condition 56. Final ESC and design submission would also include any ecological requirements (fish relocation and confirmation that the design complies with fish passage requirements (if deemed necessary)). This standard practice on all large projects that over extended timeframes. Detailed design information is not provided or available at the time of application.	Shanelle has advised that she considers that her original queries have now either been addressed or can be deferred to consent conditions.

112	Simon Cocker	Landscape	Description of Missing Information Schematic cross sections through the Northern Bund illustrating its height and form, and cross section(s) illustrating how this feature will relate to the potentially effected properties to the north of the Project Area on Sonja Drive. Why is this Information Essential? The Northern Bund is relied upon to provide mitigation for viewers to the north, and is described in 6.1.1.3 of the AEE. Although the area of this proposed feature is described, its form and height is not. Without the information above, it is difficult to understand the mitigation effect of this feature and how it relates to views from the identified properties (particularly on Sonja Drive).	Yes	No	No	Three schematic cross sections have been prepared which show the Project at Stage 2 and Stage 5. With the northern bund illustrated in Stage 2. The alignment of the cross sections relates to the identified properties along the western portion of Sonja Drive and cut across the quarry to the most elevated portion of the quarry behind the bund. Mitigation planting to the north has been indicated in these cross sections which corresponds to the anticipated growth heights adopted in the visual simulations. At the end of Stage 2, the Eucalyptus are anticipated to be up to 15m and Evergreen Alder up to 12m. These are planted near the toe of the northern bund. Kanuka has also been illustrated at 1.5. high. For Stage 5, when the northern bund is removed, the Eucalyptus have been illustrated at 40m high and the Evergreen Alder at 25m high. Kanuka has been shown at 9m high.	
113	Simon Cocker	Landscape	Description of Missing Information Visual simulation showing Stage 1 of the proposed works from Viewpoint 11. Why is this Information Essential? The visual simulations included in the landscape assessment show the anticipated view at Stage 2 (15 years) but not earlier. The assessment notes that “During Stage 1, the greatest change to these views will be the progressive development of the northern bund. Whilst remaining beyond the ONL delineation, the earthworks will be a visible ‘detraction’ to the amenity qualities of the ONL and therefore effects will be more elevated...” acknowledged change it would assist with an understanding of that change if a simulation could be provided for Stage 1.	Yes	No	No	A visual simulation has been prepared showing Stage 1 of the proposed works and is attached as Attachment F. As a worst-case scenario, the northern bund has been illustrated at the end of the earthworks season, prior to any hydroseeding. It should be noted that the works within the Stage 1 quarry pit occur behind a minor ridge within the site, and therefore, the proposed quarry is not visible.	
114	Vanessa Leddra	Policy	No	No	Yes	I have looked at the AEE and relevant information on this. Policy team do not have any requests for additional information, no site visit needed, no major issues envisaged at this stage.	No response required.	
115	Angela Fulljames – Chair: Franklin Local Board	Franklin Local Board	No	No	Yes	Notes: The Local Board does not have a formal decision-making role, but can provide local insights on	Noted, no response required.	

						community impacts, transport, open space, mana whenua engagement, and infrastructure alignment. There is no requirement for applicants to respond to Local Board feedback, but it can be considered by the Expert Panel.		
116	Angela Fulljames – Chair: Franklin Local Board	Franklin Local Board	No	No	Yes	Consideration should be given to the access routes proposed for the quarry expansion. The current access includes Maketu Road, which runs through a significant new and growing residential area. Assessment should be made on the impact of the increased truck movements in these areas, and consideration should be given to using the alternative route to State Highway 1 through the new Industrial Area. If access to the expansion area can be gained in the future through alternative rural roads, consideration should be given to the impact on these roads and to the safety of the communities using the roads.	Refer to response in rows 5 to 10 above. The existing quarry has been operating for over 80 years in this location. The surrounding transport network has been designed to accommodate Drury Quarry traffic volumes, while still achieving safe and efficient travel for all users and visitors to the Dury South area. The proposed Sutton Block operation is an extension in the duration of the operation of the existing Drury Quarry activity. It is not anticipated to result in an increase in the range of traffic movements currently anticipated by the existing quarrying activity. In addition, the properties along the current main access route—Maketu Road and Bill Stevenson Drive—are subject to covenants relating to quarry traffic and other quarry-related activities.	
117	Angela Fulljames – Chair: Franklin Local Board	Franklin Local Board	No	No	Yes	The Board has concerns about the noise and dust mitigation and recommends an independent review.	Rows 91-104 contain Auckland Council Air Quality/Discharge expert Ms Boamponsem review comments of the air quality assessment. In row 95, Ms Boamponsem confirms that with appropriate implementation and ongoing monitoring, the air discharge effects of the expansion are expected to remain minor and well-controlled and that she supports the application. In regard to noise, Marhsall Day Noise Effects Report (Technical Report I, Volume 2 to the AEE report) concludes that the predicted noise levels from the Sutton Block will comply with the relevant AUP limits at all receivers. A range of mitigation measures are proposed to manage and mitigate noise on sensitive receivers, including noise monitoring as required under Conditions 87 and 88. For these reasons, we disagree that an independent review is required.	
118	Angela Fulljames – Chair:	Franklin Local Board	No	No	Yes	Environmental impact, including water and loss of existing environment – wetlands and	A comprehensive ecological off-set package is proposed as part of the Project. This package will provide ecological offset	

	Franklin Local Board					flora and fauna. Again, recommend independent review and mitigation.	over time through creation of new habitat and enhancement of existing habitat through buffer planting, riparian planting, and pest control, which will enhance ecological connectivity across the wider SAL landholdings. We disagree that an independent review is required.	
119	Angela Fulljames – Chair: Franklin Local Board	Franklin Local Board	No	No	Yes	Stormwater effects on the Drury area – concern around the effects of stormwater on the catchment area – which includes the Drury area undergoing significant expansion in commercial, industrial and residential building.	As part of the Project a robust stormwater management system is proposed which predominantly relies on the use of existing and already authorised water management system. The proposed Sutton Block development is not anticipated to result in offsite stormwater issues. Concerns regarding stormwater management across the wider Drury area is not relevant to this application.	