

Drury Quarry Sutton Block – Comments Tracker

No.	Name (Lead)	Specialism	S67 Comments	Site visit Required	Preliminary Comments Provided	Applicants response dated 18/8/2025	AT's review comments dated 25/8/2025
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 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".	As AT has already indicated, AT's primary concern is the impact the proposal will have on the road pavement of the surrounding roads. The increased number of HCVs using the surrounding roads as part of the proposal combined with the duration of the consent means that it is likely that those roads will be damaged because of those additional vehicles on the road network. Based on the information that has been made available to it, AT cannot rule out the possibility of pavement damage resulting from the proposal. The applicant appears to accept that road damage is likely but suggests that it is AT's role to repair that resulting damage. AT disagrees. While it has a discretion as to road works it carries out, AT does not consider that it is responsible for mitigating the effects of the applicant's proposal – rather that is the responsibility of the applicant. The Pavement Impact Assessment report (PIA) aims to demonstrate whether existing roads have adequate capacity to handle the additional truck traffic. Please note that AT TDM Engineering Design Code Pavement & Surfacing 2025 requires undertaking PIA once the HCV volume on road increases more than 10%. In assessing the applicant's proposal AT has identified the following effects on the road network: Effects of Traffic Volume on Road Safety and Convenience: - Safety Risks: - Heavy commercial vehicles (HCVs) can impact the durability of road pavements, leading to issues like alligator cracking, rutting, and slippage. - Premature pavement failure due to increased traffic loading poses an environmental effect that could adversely affect road safety. - Infrastructure may become unfit for purpose, impacting driver behaviour. - Road Durability and Fit-for-Purpose Infrastructure

							- Roads are finite physical resources that must be sustainably managed. - The Auckland Unitary Plan (AUP) acknowledges this finite nature. - Auckland Transport (AT) seeks certainty that roads can handle predicted or proposed traffic loads. - Heavy truck traffic can strain road pavements, affecting their longevity and safety. Section 17 of RMA is very clear, as a first principle the applicant should avoid any adverse effects created by the activity. If the adverse effects can't be avoided the applicant should provide remedies to mitigate the adverse effects. In this case AT believe the proposed activity will create potential adverse effects on the existing road pavement structure, which will pose a safety risks to road users. <u>Adverse effects</u> 17. Duty to avoid, remedy, or mitigate adverse effects (1) Every person has a duty to avoid, remedy, or mitigate any adverse effect on the environment arising from an activity carried on by or on behalf of the person, whether or not the activity carried on in accordance with- (a) any of sections 10, 10A, 10B, 10B and 20 A: or (b) a national environmental standard, a rule , a resource consent, or a designation. According to Environment Court Decision for Sandglass Corporation Limited mine project where the applicant required to upgrade and maintain the Road.
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	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.	Please confirm the volume/percentage of quarry related trucks using the Quarry Road to access the potential safety and operational issues from the proposed additional truck movements. Please refer to Section 17 of RMA, it is the applicant's responsibility to avoid the potential

			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.			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 Norsho Bulc, at [95], referred to above, the use of roads is expressly a permitted activity in the Auckland Unitary Plan.	adverse effects from the proposed activity. If the adverse effects can't be avoided the applicant should provide remedies to mitigate the adverse effects.
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).	The AM peak hour SIDRA modelling movement summary table provided by the applicant for the Bill Stevenson Drive / Toiawaka Road intersection shows 149 vehicles per hour turning right out of the east leg of the intersection (Bill Stevens Drive) into the north leg of the intersection (Jack Stevenson Road). 90% of these vehicles are heavy vehicles, so they are clearly trucks associated with the quarry. Please confirm the route these vehicles travel after they have left the intersection. It appears that they will head north towards Fitzgerald Road, but the applicant has stated that no quarry traffic uses this road. There are a similar number of vehicles making a left turn between the north and east legs of the intersection, travelling to the quarry. Please confirm the route that these vehicles take before reaching the intersection.
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 adverse roading network operational issues from the additional truck movements at this intersection.	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 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	The applicant's response directly contradicts the assessment they have previously provided. Section 6.1 of the Integrated Transportation Assessment (ITA) prepared by Don McKenzie Consulting and dated March 2025 states: "Over the next several years Stevenson expects that the natural increase in demand for aggregate and associated materials could result in the day number of quarrying-related truck movements rising to at least 2,000 tmpd." This item is linked to item 9 and further comments are provided below with that item. The information in the 2025 ITA clearly shows that quarry traffic using the John Main intersection

						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.	could increase as a result of the proposal. The applicant has not provided the information requested to assess this.
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 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.	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 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.	The applicant's own SIDRA modelling and ITA show that quarry related traffic is much higher than allowed for in the 2019 ITA for PC46. The AM peak hour SIDRA modelling movement summary table provided by the applicant for the Bill Stevenson Drive / Toiawaka Road intersection shows that, when comparing the base and proposed scenarios the number of vehicles using the intersection goes from 288 vehicles per hour (vph) to 1,186 vph, an increase of 898 vph. With almost all additional movements travelling to or from the eastern leg (which is the road to the quarry). The response states that the application has adopted a 50% future growth year scenario. 50% of 288 vph is 144 vph. 898 vph less 144 vph is 754vph, which we can infer to be quarry traffic. The appendix to the Integrated Transportation Assessment (ITA) prepared by Don McKenzie Consulting and dated March 2025 states that "The current peak period traffic activity at these intersections includes approximately 80 – 100vph of quarry related heavy vehicles". This is not consistent with the response which refers to 18-40 trucks/hr in 2036. The applicant has provided inconsistent information, and unable to draw a conclusion as to what the effects are on the AT network with inconsistent information.

							Please request the applicant to review their ITA. If there are any incorrect information, they should supply an updated ITA with the changes clearly indicated. If they consider that the ITA they have already provided is still correct in all respects then they could confirm this in writing and provide an explanation of the inconsistencies between their ITA and their response.
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.	The applicant's response states that degree of saturation should also be used in combination with level of service. Page (ix) of the integrated Transportation Assessment (ITA) prepared by Don McKenzie dated March 2025 states that; "The term Degree of Saturation ("DoS") is often used to refer to the percentage of saturation (or ultimate capacity) and the value DOS of 0.8 or 80% of ultimate capacity is adopted as a useful target performance level." The SIDRA modelling provided by the applicant for Bill Stevenson Drive / Toiawaka Road intersection shows a DoS of 0.888 for the intersection. This exceeds that 0.8 suggested by the applicant as the appropriate ultimate capacity for the intersection in the ITA.
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.	For the Maketu Road / Bill Stevenson Drive intersection the baseline model (i.e. the intersection without the additional traffic from the proposal) shows 316 vehicle movements per hour. This is very low, please confirm how this figure was determined. Did they make any allowance for developments nearby which are consented but not yet complete?. It appears that it might be existing traffic at the intersection, with much of the surrounding industrial land in an undeveloped state and the Maketu Road link to the north incomplete. The modelling with the proposed quarry traffic is already showing level of service (LoS) C at the Maketu Road / Bill Stevenson Drive intersection and LoS D at the Bill Stevenson / Toiawaka Intersection with the proposed quarry traffic.

							AT expect that one the surrounding industrial land is developed the LoS of the intersections could drop to a level which is unacceptable. Please ask the applicant to provide modelling which shows the two intersections with the proposed quarry and the surrounding industrial land fully developed. AT do not agree that simply adding 50% more traffic to the existing traffic at the intersection is an appropriate way to estimate future non-quarry traffic through the intersection, as very little of the surrounding land is currently developed.
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