

## Specialist Response Template – Fast-track Approvals Act 2024 – Substantive Application

### Technical Specialist Memo - Stormwater

To: Colin Hopkins – Lead Planner & Doug Fletcher – Principal Project Lead

From: Hillary Johnston – Consultant Specialist, Stormwater, Wastewater and Industrial Trade Activities, Specialist Input Unit, Resource Consents Department

Qualifications & Relevant Experience: I hold the qualification(s) of Bachelor of Science in Environmental Science and Geography, and have 12 years of experience in regulatory stormwater assessments. I am a Certified Environmental Practitioner, a full member of the Environmental Institute of Australia and New Zealand, a member of WaterNZ, and an associate member of Engineering New Zealand. I have prepared expert evidence and technical assessments for resource consent applications, plan changes, notices of requirement for designation, and fast-track applications, and have appeared as an expert witness for Council before consent authorities and the Environment Court.

Preparation in Accordance with the Code of Conduct: I confirm that I have read the Environment Court Practice Note 2023 – Code of Conduct for Expert Witnesses ([Code](#)), and have complied with it in the preparation of this memorandum. I also agree to follow the Code when participating in any subsequent processes, such as expert conferencing, directed by the Panel. I confirm that the opinions I have expressed are within my area of expertise and are my own, except where I have stated that I am relying on the work or evidence of others, which I have specified.

Date: 22 September 2025

### 1.0 Application Description

#### Application and property details

Fast-Track project name: Drury Quarry Expansion – Sutton Block

Fast-Track application number: FTAA-2503-1037 (EPA reference) + BUN60449474 (Auckland Council reference)

Site address:

121 MacWhinney Drive, Drury; 1189 Ponga Road, Drury; 2113 and Ponga Road, Papakura

## 2.0 Documents Reviewed

The following documents have been reviewed in prepping of this memorandum:

- *Application for Resource Consent and Assessment of Environmental Effects* – Version 6, dated 31 March 2025, prepared by Tonkin + Taylor
- *Appendix D – AEE Drawing Set*, March 2025, prepared by Boffa Miskell
- *Drury Quarry – Sutton Block Expansion, Quarry Management Plan – Sutton Block* – Version 000, dated 28 March 2025, prepared by Stevenson
- *Proposed Sutton Block Expansion Groundwater & Surface Water Effects Assessment* – Version 3, dated 25 March 2025, prepared by PDP
- *Drury Quarry – Sutton Block Expansion, Council s67 comments, Applicants Response* dated 12 August 2025
- *General conditions – Drury Quarry Sutton Block*, Version dated: 12 August 2025 (Provided after Panel appointment)
- *Drury Quarry - Sutton Block Expansion - Comment Tracker Table* dated 17 September 2025
- *Drury Quarry – Sutton Block Expansion, Quarry Management Plan – Sutton Block* – Issue 02, dated 17 September 2025, prepared by Stevenson
- *General conditions – Drury Quarry Sutton Block*, Version dated: 17 August 2025

## 3.0 Additional Reasons for Consent Not included in AEE

The site is zoned *Rural – Mixed Rural Zone* and *Special Purpose – Quarry Zone*. It is not subject to a Stormwater Management Area – Flow overlay.

The Applicant has applied for a private diversion and discharge of stormwater consent (referenced by Council as DIS60449510). The reason for consent identified by the Applicant's Agent is E8.4.1 (A10)<sup>1</sup>.

The Application material 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 material does not state whether additional ITA consents are sought for activities associated with the expanded quarry operations. This was clarified following additional feedback provided on the Application (Item 74 –

---

<sup>1</sup> AEE – Table 8.2, page 83

**Appendix A).** The Applicants Agent has confirmed that all *Industrial Trade Activity's* will be undertaken within existing FOH areas of the site which are authorised by existing consents under E33.

I agree with the reasons for consent outlined by the Applicants Agent and agree that additional consents under E33 are not required for the Sutton Block expansion.

#### 4.0 Specialist Assessment

##### ***Engagement***

A site visit was undertaken at Drury Quarry on the 12<sup>th</sup> August 2025. The Applicant's Team provided a comprehensive tour of the existing site operations including the existing quarry pit, water treatment plant, and stormwater pond, as well as the proposed location of the Sutton Block Pit.

At the time of writing no additional further engagement or meetings with the Applicant's Team or Agents have been undertaken.

##### ***Existing environment***

The Drury Quarry has been operating at the site for over 80 years. The existing operations subject to a number of resource consents that form part of the existing environment including consents relevant to the management of stormwater runoff and industrial or trade activities.

Of most relevance to this assessment, the Front of House Relocation consent (BUN60359817 – expiry 7 October 2055) authorised the relocation and operation of quarry activities including processing equipment, aggregate storage, weighbridge facilities, stormwater treatment, and other administrative activities.

The proposed Sutton Block quarry expansion is located within the upper reaches of Northern Tributary (NT1) catchment. The tributaries within this catchment discharge to the Hingaia Stream. Discharges to lower reaches of the NT1 stream associated with the existing Drury Quarry water management system and lamella are authorised under resource consent reference BUN60359817 and do not form part of this resource consent application.

##### ***Potential effects***

The proposed application includes the development of a new quarry pit area of approximately 108 ha, to a maximum depth of approximately -60 RL m over an approximate 50-year period.

Access to the Sutton Block area will be gained by forming an approximate 20 m wide and approximately 350 m long quarry access road from the existing Drury Quarry area. The Applicant's Agents have clarified that all haul roads and the initial pit (including internal roads within the pit) are considered impervious areas.

The primary contaminant of concern in relation to stormwater runoff is sediment, or suspended solids. Potential sources of sediment are associated with overburden removal and stockpiling within the footprint and the expansion of the quarry footprint. Internal pit roads will also be constructed as the pit expands.

The Sutton Block expansion includes surface water augmentation to offset loss of stream base flow. Reclamation of streams and wetlands is proposed, along with stream diversion, resulting in the loss of approximately 3,341 linear meters of permanent and intermittent stream reaches, as well around 1.9 hectares of wetlands.

The proposed works are acknowledged by the Applicant's Agents as having a more than minor effects on stream and wetland habitat within the site prior to offsetting.

### ***Proposed mitigation***

#### ***Stormwater***

The AEE outlines that all stormwater within the Sutton Block catchment will be diverted and discharged into the proposed Sutton Block pit sump. This includes the diversion and discharge of stormwater across the proposed access and haul roads.

The Applicant's Agents have outlined that all site water directed to the Sutton Block pit and will be:

- Used for preliminary processing within the pit;
- From the pit, clean water will be pumped and discharged directly to Stream 4 (NT1);
- Dirty water will be either;
  - Left to settle in the Sutton Block pit and once below a certain turbidity threshold (100NTU) discharged as clean water to the Stream 4 (NT1); or
  - Pumped and integrated into the Drury Quarry Water Management and sent to the Lamella for processing before being discharged to the lower reaches of NT1 (Stream 4)

The Applicant's Agents have described that the current Drury Quarry Water Management System consists of a series of automated and manual turbidity-controlled pumps that move water (both groundwater and surface water) around the site to operate the plant, convey clean water, and treat dirty water before being discharged off site. Specifically, to the NT1 Stream via the stormwater management pond.

The Drury Quarry Water Management System is proposed to also service the Sutton Block pit. The Applicant's Agent has outlined that the system has been designed, installed, and managed with significant extra capacity availability, which will accommodate the Sutton Block pit once it comes online.

The capacity of the Drury Quarry Water Management System was further queried within preliminary comments provided on the Application (Item 72 – **Appendix A**). The Applicant's Agent has clarified that the Lamella is set at a pre-determined rate of discharge, and that the site team control the amount of water entering the Lamella. All other water will be held in the pit/s with the discharge limited via

turbidity controlled pumps. It is agreed that there is more than sufficient volume available within the Drury Quarry Pit and/or the Sutton Block pit to detain runoff within the pit/s before discharge to the onsite treatment systems.

#### *Natural wetlands*

The proposal results in the loss of approximately 1.88 ha of natural inland wetlands. The Applicant's Agents have outlined that these wetlands are not particularly high quality and have large amounts of exotic species present. It is further explained that this wetland loss is unavoidable as it is located within the quarry pit and within the SPQZ land, which is earmarked for future quarrying activity. The Applicant's agents have detailed the loss of wetland at the Drury site will be addressed through the offset package proposed at the Tuakau offset site which will include 4.04 ha of wetland restoration, including the creation of wetland habitat.

In addition, a comprehensive mitigation offset package, including 62 ha of revegetation, 108 hectares of native forest enhancement through pest control, and the restoration of 3,341 m of stream and 4.04 ha of wetland habitat is proposed.

Wetland loss and the proposed offset mitigation is assessed in detail by other Council ecological specialists.

#### ***Alignment with relevant statutory/planning provisions***

##### *Auckland Unitary Plan*

The site is zoned *Rural – Mixed Rural Zone* and *Special Purpose – Quarry Zone*. It is not subject to a Stormwater Management Area – Flow overlay.

The Applicant has applied for a private diversion and discharge of stormwater consent (referenced by Council as DIS60449510). The reason for consent identified by the Applicant's Agent is E8.4.1 (A10)<sup>2</sup>.

The Application material 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 material does not state whether additional ITA consents are sought for activities associated with the expanded quarry operations. This was clarified following additional feedback provided on the Application (Item 74 – **Appendix A**). The Applicants Agent has confirmed that all *Industrial Trade Activity's* will be undertaken within existing FOH areas of the site which are authorised by existing consents under E33.

I agree with the reasons for consent outlined by the Applicants Agent and agree that additional consents under E33 are not required for the Sutton Block expansion.

---

<sup>2</sup> AEE – Table 8.2, page 83

### *National Environmental Standards: Freshwater*

The Applicant's Agent has identified that consent is required as a Discretionary Activity under Regulation 45A(4) for the taking, use, damming, or diversion of water within, or within a 100 m setback from a natural inland wetland associated with quarrying activities.

I agree with the reasons for consent outlined by the Applicants Agent.

## **5.0 Section 67 Information Gap**

I have identified that there are no section 67 information gaps. Preliminary comments on the Application were provided to the Applicant's Agents and have sufficiently been addressed as outlined within Appendix A of this memo.

## **6.0 Recommendation**

Based on the information provided in the Application documents and the further clarifications received in response to preliminary comments provided, I am satisfied that the proposed stormwater management approach is appropriate for the proposed quarry expansion, subject to the proposed conditions of consent.

Accordingly, based on the information available, I support the application.

## **7.0 Proposed Conditions**

Comments on proposed conditions of consent (17 September 2025) are included as follows.

*Note: Where a condition is not addressed within this assessment, it should be taken as having no comment or objection.*

| PART B – GENERAL CONDITIONS APPLYING TO ALL CONSENTS |                                                                                                                                                                                                                                                                                                                |                                                       |                        |       |                                                       |                                                                                          |
|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|------------------------|-------|-------------------------------------------------------|------------------------------------------------------------------------------------------|
| No.                                                  | Condition                                                                                                                                                                                                                                                                                                      |                                                       | SWWWITA Comment        |       |                                                       |                                                                                          |
| 11                                                   | Any management plan must be submitted to the Council for Certification in accordance with Table 1.<br><br><i>Table 1: Management certification timeframes</i><br><br>. . . <table><tr><td>Quarry Management Plan</td><td>63-64</td><td>20 working days prior to commencement of construction</td></tr></table> |                                                       | Quarry Management Plan | 63-64 | 20 working days prior to commencement of construction | Support inclusion of Quarry Management Plan within this condition and proposed timeframe |
| Quarry Management Plan                               | 63-64                                                                                                                                                                                                                                                                                                          | 20 working days prior to commencement of construction |                        |       |                                                       |                                                                                          |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                      |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
| 61 | The objective of the Quarry Management Plan (QMP) is to set out the practices and procedures to be adopted at the Site to ensure compliance with key operational requirements.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Condition supported. |
| 20 | <p><b>NT-1 Stream Water Quality Monitoring and Management Plan (Construction Phase)</b></p> <p>The objective of the NT-1 Stream Water Quality Monitoring and Management Plan (WQMMP) is to outline the water quality monitoring requirements for the NT-1 Stream during Construction Works required to provide site access, to assess potential effects on water quality and enable appropriate management responses.</p>                                                                                                                                                                                                                                                                                                        | Condition supported. |
| 21 | <p>The WQMMP must include:</p> <p>(a) A drawing showing the monitoring locations upstream and downstream of Construction Works activities;</p> <p>(b) Details of the methodology for undertaking water quality monitoring;</p> <p>(c) The frequency of water quality monitoring for the duration of Construction Works in close proximity to the NT-1 Stream;</p> <p>(d) The monitoring parameters to be tested, which must include turbidity (NTU), pH, and total suspended solids (mg/L); and</p> <p>(e) Details of the response actions to be implemented where downstream monitoring results indicate deviations in turbidity, pH, or TSS relative to upstream results that can be attributed to the Construction Works.</p> | Condition supported. |
| 63 | <p><b>Quarry Management Plan – <del>Sutton Block</del></b></p> <p>The objective of the Quarry Management Plan (QMP) is to set out the practices and procedures to be adopted at the Site to ensure compliance with key operational requirements.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Condition supported. |
| 64 | <p>The QMP must address:</p> <p>(a) The stages of quarry development;</p> <p>(b) Operational noise management and monitoring, complaints and response procedure;</p> <p>(c) Operational vibration management and monitoring, complaints and response procedure;</p> <p>(d) Operational <del>erosion and sediment control plans</del> <u>SESCPs</u> as described in Conditions <del>20</del> <u>22-23</u> above; and</p> <p>(e) Closure and rehabilitation plans (only to be included within 5 years of confirmed closure).</p>                                                                                                                                                                                                   | Condition supported. |
| 65 | <p><b>Annual Monitoring Report</b></p> <p>The consent holder must provide to the <u>Team Leader Environmental Monitoring</u> (<a href="mailto:monitoring@aucklandcouncil.govt.nz">monitoring@aucklandcouncil.govt.nz</a>) <del>Manager</del> by <b>**date**</b> each year, or on an alternative date as agreed with Council, an Annual Monitoring Report.</p>                                                                                                                                                                                                                                                                                                                                                                    | Condition supported. |
| 66 | The purpose of this report is to provide an overview of the monitoring and reporting work undertaken, and any environmental issues that have arisen during Construction Works or Operational phase.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Condition supported. |
| 67 | As a minimum this report must include:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Condition supported. |

|                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                            |
|----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                          | <p>(a) All monitoring data required in accordance with the conditions of this consent <del>both in the Construction Works and Operational phase;</del></p> <p>(b) <u>Records of response actions required under Condition 21</u></p> <p>(c) Records of inspection and maintenance undertaken required under Conditions <del>80 and 81-84;</del></p> <p>(d) Records of noise measurements required by Condition <del>8595;</del></p> <p>(e) Records of vibration from permanent vibration monitoring stations required under Condition <del>9599</del>(f);</p> <p>(f) <u>Records of complaints received and the responses to those complaints;</u></p> <p>(g) Any reasons for non-compliance with the conditions of this resource consent;</p> <p>(h) Measures taken to address compliance issues; and</p> <p>(i) Recommendations on alterations to any monitoring required.</p> |                                                                                                                                                                                                                                                            |
| <b>PART E – SPECIFIC CONDITIONS – GROUNDWATER PERMIT</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                            |
| 138                                                      | <p><b>Freshwater monitoring</b></p> <p><b>Pre-Augmentation Baseline Monitoring of Temperature and Dissolved Oxygen</b></p> <p>A baseline survey comprising continuous baseline monitoring (one upstream, two downstream and the augmentation source) of water temperature and dissolved oxygen, at a minimum of four locations at each of the sites (where augmentation is to occur), must be undertaken within the period commencing 1 December and ending 31 March, prior to implementing any augmentation programme.</p>                                                                                                                                                                                                                                                                                                                                                     | <p>Condition supported.</p> <p>It is recommended that the baseline survey include upstream and downstream monitoring for water quality, including turbidity, pH, and TSS to aid in comparison with any results collected for the WQMMP (Condition 21).</p> |
| 139                                                      | <p><b>Water Temperature and Dissolved Oxygen</b></p> <p>The consent holder must ensure that no stream-flow augmentation results in (after reasonable mixing):</p> <p>(a) A downstream water temperature increase of 3°C or more compared to the temperature immediately upstream of the augmentation discharge point; and</p> <p>(b) A dissolved oxygen concentration less than 6 milligrams per litre.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>Condition supported.</p>                                                                                                                                                                                                                                |
| 140                                                      | <p>If the results of samples obtained from the stream monitoring locations required in Condition 142 show an increase in the parameters listed in (a) above caused by the exercise of this consent over a consecutive period of three months, the consent holder must prepare and submit to the Council a mitigation plan outlining mitigation measures to be implemented to address such effects.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>Condition supported.</p> <p>The condition references 142, amendment required to now reference condition 139.</p>                                                                                                                                        |

## 8.0 Supporting Documents

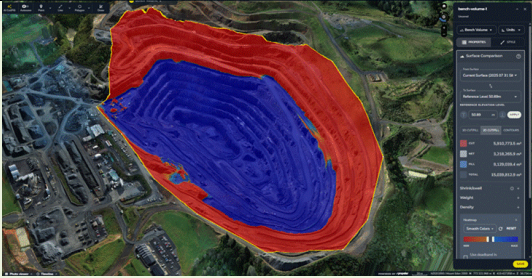
- **Appendix A – Drury Quarry Sutton Block – Comments Tracker (SWWWITA comments 22.08.2025)**



Appendix A – Drury Quarry Sutton Block – Comments Tracker – 17 September 2025

| No. | S67 Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Applicants Response                                                                                                                                                                                                                                                                                                                                                                                                                           | Council Response 25.08.2025                                                                                                                                                                                                                                                                                                                                             | Applicants Response 17.09.2025                                                                                                                                                                                                                                                                                                                                                                            | Council Response 22.09.2025                                                                                                                                                                |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 69  | <p>This specialist response identifies critical information gaps that prevent proper assessment of the activity and development proposal under the following subheadings:</p> <ol style="list-style-type: none"> <li>1. Total Impervious Area</li> <li>2. Stormwater Management Plan or Report</li> <li>3. Sizing of the Sutton Block Pit Sump</li> <li>4. Capacity of the Existing Drury Quarry Water Treatment System</li> <li>5. 'Clean Water' Discharge to Stream</li> <li>6. Industrial or Trade Activities</li> <li>7. Water Quality Monitoring"</li> </ol> <p>TOTAL IMPERVIOUS AREA</p> <p>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.</p> <p>Why is this Information Essential? - Without this information, it is not possible to assess the likely stormwater runoff volumes or determine whether 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).</p> | <p>Refer to responses in rows 70-75.</p> <p>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.</p> | <p>Addressed, confirmed all project area has been considered impervious</p>                                                                                                                                                                                                                                                                                             | <p>Resolved.</p>                                                                                                                                                                                                                                                                                                                                                                                          | -                                                                                                                                                                                          |
| 70  | <p>STORMWATER MANAGEMENT PLAN OR REPORT</p> <p>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.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>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.</p>                             | <p>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</p> <p>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.</p> | <p>Refer to Applicant's response to row 73. Consent is sought for the discharge of groundwater and surface water ('clean water') into NT-1 stream (Stream 4) as part of the proposed groundwater take and diversion permit sought.</p> <p>Further proposed consent Conditions 20-21 (refer to updated consent conditions attached as Attachment A dated 17 September 2025) provide for a 'NT 1 Stream</p> | <p>Addressed.</p> <p>A water quality monitoring and management plan is now proposed and will be ensured by conditions of consent.</p> <p>The QMP has also been updated as recommended.</p> |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                    |   |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|
|    | <p>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.</p>                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>Water Quality Monitoring and Management Plan' (WQMMP) to outline the water quality monitoring requirements for the NT-1 Stream during Construction Works.</p> <p>QMP updated to include information on stormwater management and treatment of stormwater runoff (refer to Section 4.2.2). See updated QMP attached as Attachment C dated 17 September 2025.</p> |   |
| 71 | <p><b>SIZING OF THE SUTTON BLOCK PIT SUMP</b></p> <p>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.</p> <p>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.</p> | <p>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.</p> <p>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 therefore additional calculations are not deemed to be necessary.</p> | <p>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.</p> <p>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 Block Pit to detain water before it is pumped to the Drury Quarry Pit.</p> | -                                                                                                                                                                                                                                                                                                                                                                  | - |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                     |   |   |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  <p>Figure 1: Drury Quarry Pit Storage Volume – approximately 9.1 million m<sup>3</sup>.</p>                                                                                                                                                                                                                                                                                  |                                                                                                                                                                     |   |   |
| 72 | <p><b>CAPACITY OF THE EXISTING DRURY QUARRY WATER TREATMENT SYSTEM</b></p> <p>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.</p> <p>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.</p> | <p>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.</p>                                             | <p>Addressed. It is agreed that more than sufficient volume available within the Drury Quarry Pit to detain runoff before discharge to onsite treatment systems</p> | - | - |
| 73 | <p><b>‘CLEAN WATER’ DISCHARGES TO STREAM</b></p> <p>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.</p>                                                                                                                                                                                                                                                                                                                                                                                             | <p>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.</p> <p>Discharges to lower reaches of the NT-1 stream associated with the existing Drury</p> | <p>Addressed. Areas of concern appear to be sufficiently covered by proposed groundwater conditions.</p>                                                            | - | - |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                     |                                                                                                                                                                            |                                                    |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
|    | <p>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 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.</p> | <p>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.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                     |                                                                                                                                                                            |                                                    |
| 74 | <p><b>INDUSTRIAL OR TRADE ACTIVITIES</b></p> <p>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.</p> <p>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.</p>                      | <p>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.</p> | <p>Confirmed all ITA activities will be undertaken within existing, consented FOH activity areas.</p> <p>Rock crushing is excluded from Table E33.4.3.</p>                          | -                                                                                                                                                                          | -                                                  |
| 75 | <p><b>WATER QUALITY MONITORING</b></p> <p>Description of Missing Information<br/>While the Application proposes conditions to monitor groundwater levels and quality,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>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</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>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</p> | <p>New conditions 20-21 are proposed (refer to updated consent conditions attached as Attachment A dated 17 September 2025), requiring stream water quality monitoring</p> | <p>Addressed.</p> <p>New conditions supported.</p> |

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                         |                                                                                                                                                          |  |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|  | <p>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.</p> <p>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.</p> | <p>poor, the water is simply held in the quarry pit prior to discharge to the lamella and off site.</p> <p>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.</p> <p>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.</p> | <p>environment (i.e. Stream 4/NT1) would be useful in determining the effects of the activity.</p> <p>Upstream and downstream monitoring for water quality, including turbidity, pH, and TSS are common on other quarry consents within the Region.</p> | <p>and management of NT-1 Stream. This condition requires water quality monitoring during construction, including testing for turbidity, pH and TSS.</p> |  |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|--|