

IN THE MATTER of the Fast-track Approvals Act 2024 (“**FTAA**”)

AND

IN THE MATTER of an application for approvals by Stevenson Aggregates Limited to develop, construct and operate a new quarry pit called the “Sutton Block” within the existing Stevensons Aggregates Limited (SAL) landholdings at Drury - Project - FTAA-2503-1037 - Drury Quarry Expansion – Sutton Block (“**Drury Quarry-Sutton Block**”)

MEMORANDUM OF STRATEGIC AND PLANNING MATTERS FOR AUCKLAND COUNCIL

Dated: 24 September 2025

SECTION A: INTRODUCTION

1. This Planning Memorandum sets out Auckland Council’s Strategic and Statutory Planning Assessments of the substantive application for the Drury Quarry Expansion – Sutton Block (**Application**) lodged by Stevenson Aggregates Limited (**Applicant**) under the Fast-track Approvals Act 2024 (**FTAA**), and a summary of assessment outcomes and proportionality conclusions.
2. The **Section B** Statutory Planning Assessment has been prepared by Mr Douglas Fletcher, Principal Project Lead for Auckland Council.
3. The summary of assessment outcomes and proportionality conclusions in **Section C** have been prepared by Mr Fletcher.
4. For process clarity, this assessment is based on the original application documents, and the additional updated application documents provided by the Applicant on 25 August 2025, and on the additional material provided to Council by the applicant to address s67 questions (info provided to Council on 17, 18 and 19 September 2025). This was agreed between the parties to enable Council family comments to be provided by the 24 September 2025 deadline

SECTION B: STATUTORY PLANNING ASSESSMENT

5. As noted, **Section B** has been prepared by Mr Fletcher.

6. The following Council Memos have been received which inform the overall Statutory Planning Assessment:
- Ecology (Freshwater and terrestrial) – Andrew Rossaak (**Annexure 1**)
 - Auckland Transport – Nagarai Prabhakara (AT) (**Annexure 2**)
 - Economics – James Stewart (**Annexure 3**)
 - Groundwater – Philip Kelsey (**Annexure 4**)
 - Regional Earthworks and Streamworks – Shanelle Beer Robinson (**Annexure 5**)
 - Heritage – Mica Plowman (**Annexure 6**)
 - Landscape and visual – Simon Cocker (**Annexure 7**)
 - Stormwater – Hillary Johnston (**Annexure 8**)
 - Air Discharge – Louis Boamponsem (**Annexure 9**)
 - Parks – Lea Van Heerden (**Annexure 10**)
 - Noise and Vibration – Bin Qui (**Annexure 11**)
 - Contamination – Sharon Tang (**Annexure 12**)
 - Regulatory Engineering –Abhi Pandith (**Annexure 13**)
 - Planning – Colin Hopkins (**Annexure 14**)
 - Watercare - Charlie Song (**Annexure 15**)
 - Franklin Local Board comments – Angela Fulljames, Chair: Franklin Local Board (**Annexure 16**)
7. Council Environmental Monitoring have not provided a memo but have engaged in the process by reviewing the initial draft conditions which were lodged; and the updated draft conditions dated 12 August 2025. The outstanding s67 questions raised by the Council monitoring team (Sian Farrell) in relation to the draft conditions can be viewed in the Council s67 tracking document (**Annexure 17**), specifically items numbered 12, 14, 15, 16, 20, 24, 26, 38, and 45.
8. The Franklin Local Board comments and comments are not discussed in this **Section B**.

Outstanding Material from Applicant, and Review Limitations

9. The Applicant had foreshadowed that additional material would be made available to Council between 17-19 September 2025, that would include the following:
- Response to the one outstanding groundwater s67 question.
 - Responses to the two outstanding stormwater s67 questions
 - Responses to the eight outstanding Auckland Transport s67 questions
 - Responses to the ten outstanding Ecology s67 questions

The above information has been received and reviewed by Council.

10. The applicant had foreshadowed that they would not be able to respond to the following matters by the 17-19 of September 2025:
- The nine outstanding Council Monitoring s67 questions (items numbered 12, 14,

15, 16, 20, 24, 26, 38, and 45 within Council s67 comments tracker). This was because Council was only able to advise the applicant that these items remained unresolved on 17 September 2025.

11. At the time of drafting their memo (22 September 2025), Auckland Transport outlined two section 67 information gap questions.
12. At the time of drafting their memo (18 September 2025), Council Economist outlined three section 67 information gap questions.
13. At the time of drafting their memo (23 September 2025), Council Ecologist outlined four section 67 information gap questions.
14. To the extent that the process may allow for it (e.g. through the Panel's use of its section 67 power), a supplementary review of any future responses made by the applicant to respond to the:
 - nine outstanding Council Monitoring s67 questions
 - four outstanding Council Ecologist s67 questions
 - two outstanding Auckland Transport s67 questions
 - three new Council Economist s67 questionsis considered necessary following the 24 September 2025 deadline to ensure all relevant matters have been properly considered in the Council's assessment of the Application.
15. It is highlighted that the most recent updated draft proposed conditions dated 17 September 2025 have not been reviewed or commented on by all Council specialists. However, all Council specialists did review the original draft conditions set dated 31 March 2025 and the updated conditions set dated 12 August 2025. A review will be undertaken following receipt of the full updated draft consent set. Notwithstanding this, where relevant, comments on the proposed conditions have been provided within the Memos of a number of Council Specialist. These include identification of where proposed conditions are deficient, where additional consent conditions required, and changes are required to proposed conditions. In addition, the updated proposed consent conditions continue to include certification to be provided by Council within 20 working days of receipt of the information being provided and if this is not provided within 20 working days, then this is considered to be deemed certification. Council does not accept this wording and considers such conditions are unlawful.

SECTION B.1 – EFFECTS ASSESSMENT

Ecology (Freshwater and terrestrial)

Applicant's Assessment

16. A series of Ecological reports prepared by Bioresearches have been lodged with the Application. This includes documents which describe the effects of the proposal on terrestrial and freshwater ecology and documents related to an effects management

package which outlines how the applicants proposed to manage ecological effects associated with the proposal. Recommendations from these reports are then tied into related proposed consent conditions.

Council's Assessment

17. Council's Ecology specialist has reviewed the application for potential effects on Terrestrial and Freshwater Ecology (**Annexure 1**)
18. Ecological effects management for terrestrial and freshwater have been provided through avoidance (the quarry area is north of a watercourse and SEA), mitigation (through fauna management plans) and offset. The greatest adverse effect is the reclamation of 3.3 km of watercourses, 2.3 ha wetlands, 17 ha native forest and 85 ha of scrub exotic forest and grassland. All apart from the scrub, exotic forest and grassland are proposed to be offset. Offsets are both close to the impact site and also in Tuakau in the Waikato.
19. There are numerous concerns regarding the proposed offsets, their calculations as well as meeting the principles of offsetting, particularly proximity, like for like and achieving net gain, some of these are outlined below.
20. There is no evidence that any of the proposed effects management should be considered as compensation and there is no test or comment to indicate that offset is not possible (the pre requirement for compensation).
21. Key differences between the NES:FM and NES:IB are that in the NES:IB net gain is mandatory, it is not optional. It must be quantitatively demonstrated, requires like-for-like comparison, must exceed baseline loss across type, amount, and condition and that "No net loss" is insufficient under NPS-IB. There is insufficient information or proposed offset to have assurance that net gain will be achieved.
22. Council's Ecology specialist does not support the s67 response regarding the removal of the 4.4 ha Hingaia planting. Specifically, that an assessment be undertaken after 10 years and if required, SAL will acquire additional land for effects management purposes.
23. No assessment has been made as to how the quarry may alter the perched water tables and how this will affect the proposed offset plantings, and if this may reduce offset success, particularly for areas close to the pit edge (planting and enhancement is proposed up to the pit extent).
24. A total of 887 trees are proposed to be planted to offset the loss of 130 large mature relic trees. These are reported to be on the Drury site (146 trees), Tuakau site (628) and Hingaia (113). However, the withdrawal of the Hingaia site and the proposed 113 trees has not been addressed.
25. Adaptive management is proposed, however thresholds or performance targets when the adaptive management is required are not provided, so it is uncertain what would trigger any adaptive management.

26. The applicant states that to maintain baseflows in Stream 4 from Stage 3 onwards, clean water from the pit sump will be pumped up to a location just above the confluence of the Stream 7 and Stream 2 catchments, at the head of Stream 4 to augment flow. However.
- There is no detail on the water quality to be achieved for the augmented flows.
 - There is no assessment as to the potential effects of reduced flows into stream 4 for any duration.
 - given that the adverse effects are permanent, the augmentation requirements and monitoring may be required for the long term as flow augmentation appears to be required for at least the duration of the quarry works (50 years), and potentially in perpetuity
27. Offsets are required to meet the principals in Appendix 6 of the NPS:FM. In particular item 7, which broadly addresses principles such as like for like and proximity. Council's Ecology specialist does not consider the offsets located in the Waikato to meet these principles.
28. There is a net loss of 3.3 km of stream from the development. This has not been accounted for.
29. There are existing offsets consented on stream 4 (from the northern quarry expansion). These were consented on the basis that there were no plans for expansion of the quarry (2018) and provided in the application material. This offset is on the stream that is fed by the entire catchment that is to be reclaimed by the proposed quarry expansion. It is therefore subject to the potential adverse effects of the activities proposed in this application.
30. wetland loss to be offset is likely to be underrepresented and the wetland offset does not have many, if any, of the ecological functions the impact wetlands exhibit. It is therefore not a considered a like for like exchange.
31. The values used in the BCM for the offset wetland value cannot be assessed as there is no evidence presented as to how they are derived
32. Given that there are concerns with the offsetting particularly regarding offset location, calculation and types, and based on the information presented and the determination that there are areas where there are information gaps, this application is not supported from an ecology perspective.

Conclusions on Freshwater and terrestrial Ecology Effects

33. There is outstanding information required from the Applicant in respect to adverse effects on terrestrial and freshwater ecology and the associated effects mitigation package.
34. Changes to consent conditions may be required to address concerns raised by Councils Ecologist.

35. As noted in Section C below in relation to Ecology, the effects on terrestrial and freshwater ecology requires further review and assessment and there are potentially significant adverse impact requiring a proportionality assessment. See Section C below.

Auckland Transport

Applicant's Assessment

36. An Integrated Transportation Assessment (ITA) report prepared by Don Mckenzie Consulting has been lodged with the Application. This includes an assessment of overall intensity of external traffic effects associated with quarrying.
37. The applicants ITA addresses the transport-related issues of the proposed Sutton Block development in regard to the following matters:
- A description of the Drury Quarry site and its surrounding traffic environment.
 - The proposed form of access and egress serving the proposed Sutton Block.
 - The proposed site vehicle circulation design.
 - The nature and expected volumes of vehicular traffic likely to be generated by the Development.
 - Compliance with the Auckland Unitary Plan – Operative in Part and its associated standards and requirements.

Council's Assessment

38. Auckland Transport has reviewed the application for potential effects on public roads **(Annexure 2)**
39. Auckland Transport (AT) has assessed the proposed application and considers there is the potential for significant adverse effects on the road network and the safety of road users. Auckland Transport notes the application proposes at least 2000 truck trips per day for the quarry operation.
40. The proposed Sutton Block expansion to the Quarry will provide at least 185 million Tonnes of aggregate supply to Auckland to support its future growth for approximately 50 years once aggregate extraction from the Sutton Block pit commences. It is anticipated that as the existing Drury Quarry pit nears the end of its life and reduces aggregate extraction, the Sutton Block pit aggregate extraction will increase to ensure a continuous supply to the Auckland region.
41. The existing Quarry has vehicle access from Bill Stevenson Road, with no changes proposed. Section 3 of the integrated transportation assessment (ITA) report prepared by Don Mckenzie Consulting, dated March 2025, states that intended truck routes for the Quarry operation are via Bill Stevenson Drive, Maketu Road, either towards the Ramarama interchange or the Quarry Road at the northern side of the Maketu Road.

42. Private plan change 46 (PC46) was approved to rezone the land to allow industrial developments at Maketu Road, Quarry Road and Fitzgerald Road, Drury. PC46 also included rezoning 20 hectares of land within the precinct from heavy industry to light industry.
43. New public roads within the PC 46 area have been built by private developers (not by the quarry owner) to support the light and heavy industry zone approved under PC 46. The public roads were built around 2019.
44. The industrial area is not fully developed yet and some of the internal roads are not yet vested with the Council.
45. The current proposal does not specify a limit on truck trips, making it difficult to predict pavement wear, asset life, and plan future road maintenance effectively.
46. AT has reviewed the previously approved engineering application plans for the new public roads constructed to support PC46. Based on the currently available pavement structure information, AT does not consider the existing pavement to have sufficient capacity and strength to support the anticipated high volume of vehicles.
47. Regarding effects on the roading network, AT main concerns around the trips relate to three main areas:
 - Damage to the road pavement caused by heavy vehicle movements,
 - potential congestion and capacity effects relating to high numbers of vehicles travelling to and from the quarry (both trucks and light vehicles), particularly during peak hours; And
 - road safety matters.
48. AT unable to complete the full assessment of the proposal ensuring the existing road infrastructure can cater for the proposed activity including truck trips due to insufficient information supplied by the applicant.
49. AT does not support the current Fast-track application based on the assessment currently provided by the applicant and considers that the application should be declined unless concerns in relation to Quarry truck trips and pavement impact along the proposed truck routes on Bill Stevenson Road, Maketu Road, Quarry Road are sufficiently addressed by the Applicant.

Conclusions re effects on Auckland Transport Road network and the safety of road users.

50. There are two outstanding s67 requests which lists information required to enable an assessment on the likely adverse effects on roading structure and capacity of the roading network.
51. Changes to consent conditions may be required to address concerns raised by AT.

52. As noted in Section C below in relation to AT, the effects on the road network and the safety of road users requires further review and assessment and is a potentially significant adverse impact requiring a proportionality assessment. See Section C below.

Economics

Applicant's Assessment

53. An Economic Impact Assessment prepared by Market Economics and dated February 2025 (the report) has been lodged in support of the Application. This assessment evaluates the impacts of the quarry's expansion and continued use, to assess the degree to which the proposal generates economic benefits for people and communities affected and the wider Auckland economy.
54. The report concludes that the proposal will provide a significant amount of high-quality aggregate for the Auckland market at sustainable prices. The volume enabled by the consent would be able to accommodate a significant proportion of Auckland's demand, providing aggregate across the long term for use in the construction of housing, roads, infrastructure, high rise buildings and factories and warehouses. The presence of the aggregate and the ability to utilise it sustainably contributes significantly to the economic wellbeing of Aucklanders.

Council's Assessment

55. Council's Economist has reviewed the application for potential economic effects **(Annexure 3)**
56. The report highlights the importance of aggregates which are a necessary product in the construction industry, particularly in roading and due to the nature of aggregates as heavy and bulky raw materials, they are expensive to move between locations.
57. The report makes some assumptions about the demand for aggregates that Council's Economist opines, likely overstate the future demand for aggregates in Auckland. However, the report is convincing that demand for aggregates is both large and will continue to grow.
58. The report estimates the benefits of the Proposed Consent range between \$2.45 billion to \$5.4 billion over the life of the Consent. Council's Economist opines; these benefits are likely overstated because:
- a. The underlying demand estimates are likely overstated.
 - b. The choice of destination of aggregates is not representative of the market.
 - c. The displacement of alternative aggregate sources being solely from out of region sources – ignoring potential Auckland-based sources.
59. There are some reasonably foreseeable costs arising from the Proposed Consent that

were not addressed in the report, such as potential environmental costs from operation at the quarry site.

60. While Council's Economist believes the avoided costs are likely overstated, they acknowledge they are probably still large. However, they note that these benefits must be balanced against the costs that the Proposed Consent imposes, and these costs have not been considered. As a result, they consider it is therefore difficult to come to any conclusion as to whether the Proposed Consent represents a net benefit from a welfare perspective.

Conclusions on Economics

61. Councils' economist considers it is plausible that the Proposed Consent represents a significant regional benefit for Auckland as described in the FTAA, but again since the benefits have, in Council Economist opinion, been overstated and the costs have not been considered they find it difficult to conclude that the net present value of the Proposed Consent is large.
62. Councils' economist has raised 3x s67 questions in their memo dated 18 September 2025 which if the panel direct the applicant to answer, may provide greater certainty with regards to economic effects.
63. As noted in Section C below in relation to Economics, the effects associated with Economics may require further review and assessment and is a potentially significant adverse impact requiring a proportionality assessment. See Section c below.

Groundwater

Applicant's Assessment

64. A series of groundwater reports prepared by Pattle Delamore Partners Ltd (PDP) have been lodged with the Application to assess the effects of the proposed Sutton Block expansion, north of the existing Drury Quarry, on groundwater and surface water.

Council's Assessment

65. Council's groundwater Specialist has reviewed the application for potential effects on surface and groundwater (**Annexure 4**)

Groundwater Resource Availability

66. The proposed dewatering take of 7,090,517m³/yr is from the Hunua West Aquifer. With the predicted dewatering influence extending out to 7.5km, groundwater will be drawn in from both the Hunua West and the adjacent Hunua Wairoa groundwater aquifers.
67. Auckland Council CAWA (Coastal and Water Allocation) has advised that only quarry

groundwater use is considered for the project water availability assessment as the unused balance is pumped back to streams.

68. Tonkin & Taylor (TT) (2025) advised that the proposed Sutton Block Quarry water use is 124,830m³/yr. In terms of a simplistic equal recharge approach within the maximum zone of influence, the respective groundwater allocation is as follows:

- i. Hunua West 71,490m³/yr
- ii. Hunua Wairoa 53,340m³/yr
124,830m³/yr

69. CAWA confirmed on 10 July 2025 to the reviewer that there is sufficient resource water availability in both the Hunua West and Hunua Wairoa greywacke aquifers for the proposed 124,830m³/yr Sutton Block water use.

Surface Water Effects

70. Quarry dewatering drawdown is expected to reduce baseflows to a number of streams within the 7.5km radius zone of influence. The attached Figure 1 “Proposed Monitoring Bores to East of Hunua Fault” shows the predicted reduced baseflow effects for:

- i. NT1 Stream
- ii. Peach Hill Stream
- iii. Maketu Stream
- iv. Hingaia Tributary
- v. Mangawheau Stream

71. Surface water effects are considered to be less than minor with mitigation using stream augmentation. Proposed augmentation is to be sourced from the Sutton Block quarry pit or new bores located in more distant catchments.
72. Council groundwater specialist reviewed the 17 September 2025 draft condition set; and proposed / recommended a new Condition (numbered 158) to assess the requirements of stream augmentation by the Applicant when augmentation ceases by existing consent holders.

Groundwater Users

73. From Appendix L of PDP (2025a), 346 bores are listed as being potentially subject to groundwater level drawdown from Stage 5 quarrying to RL-60m.
74. The reviewer has examined selected greywacke aquifer bore logs from eleven locations and found that at five locations (bore IDs 700, 5581, 21300, 21718 and 28017) predicted groundwater levels will fall to below existing submersible pumps (recommended pump depths from drillers' logs). This is considered an adverse effect, as existing bore owners would be prevented from accessing their groundwater supply. On the basis of the eleven bore sample, the predicted quarry groundwater drawdown is expected to adversely affect a reasonable number of existing bore owners.

75. To adequately monitor groundwater drawdown effects on neighbours bores both MK1 and MG1 bores are required.
76. The reviewer understands that under the Fast Track process, potentially adversely affected third parties may not be included in the consenting process. Therefore, the acceptability of the adverse effects on bore owners depends on groundwater supply mitigation by the consent holder.
77. The 17 September 2025 draft condition set does not include groundwater supply mitigation conditions. Therefore, the reviewer has added these as new Conditions 165 to 170. These new conditions have been sourced from the existing Stevensons Quarry dewatering consent WAT60277068.
78. Councils' groundwater specialist supports the application, provided the amendments to conditions as outlined in their memo are adopted.

Conclusions on Groundwater Effects

79. Any adverse effects associated with surface and groundwater can be appropriately addressed through the implementation of amended enforceable consent conditions, recommended by Councils groundwater specialist in their memo – see annexure 4.
80. There are no significant residual surface or groundwater effects that require proportionality assessment.

Regional Earthworks and Stream works

Applicant's Assessment

81. The applicant lodged a number of reports which provide information on how regional earthworks and stream works are to be managed. These include the Erosion and Sediment Control Assessment Report Drury Quarry – Sutton Block. Prepared for Stevenson Aggregates Limited, by Southern Skies Environmental. The Assessment of Environmental Effects, The Quarry Management Plan, The Ecological Impact Assessments and proposed draft conditions.

Council's Assessment

82. Matters relating to regional earthworks and stream works have been reviewed by Council's regional earthworks and stream works specialist (**Annexure 5**).
83. The regional earthworks and stream work specialist assessment does not identify any reasons to withhold consent. They consider the regional earthworks, and stream works aspects of this proposal could be granted consent, subject to recommended conditions, for the following reasons:

- The sensitivity of the receiving environment to the adverse effects of potential sediment discharges will not be compromised given the nature of the proposed works and the implementation of suitable designs, control technologies and appropriate on-site management techniques.
- Subject to the imposition of consent conditions including the requirement for baseline monitoring of the receiving environment and rainfall monitoring, I consider that the effects on the aquatic receiving environment will be appropriately managed and mitigated.

84. The regional earthworks and stream work specialist consider it appropriate to recommend amendments to the suite of consent conditions dated 12 August 2025 including a finalised ESCP, a Rainfall Monitoring Plan, the monitoring and maintenance of erosion and sediment controls, freshwater baseline reporting, seasonal restrictions and progressive stabilisation of the site.

85. The inclusion of these conditions is consistent with similar earthworks operations granted consent for in the Auckland Region, and the wider site, and will ensure that the effects of the proposed works will be appropriately managed.

Conclusions on Regional Earthworks and Stream works

86. Any adverse effects associated with regional earthworks and stream works can be appropriately addressed through the implementation of the enforceable consent conditions recommended by Councils earthworks and stream work specialist in their memo - see annexure 5

87. There are no significant residual regional earthworks or stream works effects that require proportionality assessment.

Heritage

Applicant's Assessment

88. An Archaeological Assessment prepared by Clough and Associates (March 2025) has been lodged with the Application. This assessment evaluates whether the proposed work is likely to impact on archaeological or other historic heritage values and concludes that the proposal will have no direct effect on any known archaeological sites.

Council's Assessment

89. Council's Heritage Specialist has reviewed the application for potential Heritage effects (**Annexure 6**)

90. Council's Heritage Specialist agrees with and supports the Clough and Associates assessment of the risk to potential previously unidentified archaeological/historic heritage features within the project area (Drury Quarry Sutton Block extension). They also agree that the projects HNZPTA authority application is an appropriate means of mitigation for earthworks in this area.
91. The application has revised the areas of proposed offset mitigation planting, specifically removing proposed planting at Nga Motu O Hingaia Island (Hingaia Island).
92. The previously recommended amendment to section Part B - General Conditions B.8 Archaeology (now Part C – Specific Conditions - Land Use Consent (S9) and Streamworks Consent, Condition 74), to undertake archaeological survey prior to planting at Nga Motu O Hingaia Island (Hingaia Island) is no longer required and the Heritage specialist accepts that the remainder of the offset mitigation areas proposed within the wider SAL Landholdings are low risk and can be suitably managed under the AUP Accidental Discovery Rule (ADR), or potential HNZPT conditions.
93. The minor recommended amendment to B. 9 Accidental Discovery Protocol (now Part C – Specific Conditions - Land Use Consent (S9) and Streamworks Consent Condition 74 Accidental Discovery Protocol) is still advised.
94. In reviewing the application documentation, the proposed Condition 74 Archaeology and the minor rewording of Condition 75 Accidental Discovery Protocol are sufficient to mitigate the potential risk of archaeological/historic heritage discovery within the Project area (Sutton Block Quarry Extension and mitigation offset planting areas) and give effect to s6 (f) of the RMA.

Conclusions on Heritage

95. Council's Heritage Specialist assessed the effects of the proposed Drury Quarry Sutton Block development on the heritage resource, the magnitude of these effects, and whether adverse effects are avoided, minimized or mitigated. Any adverse effects associated with heritage can be appropriately addressed through the implementation of amended enforceable consent conditions, recommended by Councils heritage specialist in their memo – see annexure 6.
96. There are no significant residual heritage effects that require proportionality assessment.

Landscape and visual

Applicant's Assessment

97. A Landscape Effects Assessment prepared by Boffa Miskell Ltd. (24 March 2025) and supplementary landscape effects info from Boffa Miskell (August 2025) have been lodged with the Application. These assessments evaluate the level (and significance)

of the potential landscape and visual amenity effects that would result from the Project.

Council's Assessment

98. Matters associated with landscape and visual effects have been reviewed by Council's Landscape Specialist (**Annexure 7**)
99. The landholding includes four SEAs, and an area Outstanding Natural Landscape that overlays the northern portion of the Site. The project will mainly take place within the Special Purpose - Quarry Zone and that the wider Landholding allows for some separation between quarry activities and neighbouring residential viewing audiences. Activities in relation to mineral extraction are anticipated and the existing Drury Quarry has been in operation on the Landholding for approximately 80 years and imparts a strong influence on the landscape.
100. With regard to the Rural Zones / Mixed Rural Zone, the Project will occur across three areas with this zoning to the north west, north east and south east of the proposed quarry expansion. Since these areas interface with the Special Purpose - Quarry zone and the influence of the quarry will impact on the rural character and amenity values associated with neighbouring rural zones, where quarry activities occur in adjoining areas.
101. In discussing natural character effects, the LEA identifies a number of effected watercourses and wetlands and determines that these will experience a range of effects from Very low to Moderate. Taking into account offsetting and compensation, it determines that the level of effect will be managed and alongside the underlying zoning (special purpose – quarry), the adverse effects will be Very Low.
102. With regard to landscape effects, the LEA states that the proposal will avoid infringing on the ONL and notes that the subject Site does not demonstrate or contribute to the “sequence of mature and regenerating native forest”. It concludes that the adverse effect on the values of the ONL will be Low.
103. In addressing the level of effect on the values of the Kaarearea Pā, the LEA states that this feature adjoins the Special Purpose Quarry Zone, and this zone forms a part of its visual context. In conjunction with the proposed mitigation planting, it assesses the effect on the values of this feature to be Low-moderate adverse.
104. The LEA assesses the level of effect on the hydrological features and imbued values to be Low-moderate, whilst the level of adverse effect on vegetation are assessed as Low-moderate adverse.
105. The LEA identifies a number of view audiences that will experience an elevated level of adverse visual effect. These include:
- a) For viewer group 4, where the level of effect will vary over the proposed stages of extraction with the level of effect peaking at Moderate during Stage 4 (where cut faces are most visible), before reducing to Low in Stage 5.
 - b) For viewer group 6 the level of effect is expected to increase to Low moderate

through Stage 2, then remaining at this level until Stage 5 when the level will increase to Moderate.

- c) Viewer group 7 will experience a Low level of effect, increasing over Stage 2 to Low- moderate, and then peaking at Moderate during Stage 5.
- d) The highest level of adverse effect is predicted for viewer group 8 where the level of effect is expected to fluctuate from Moderate-high in Stage 1, to Low-moderate in Stage 2, and then rise again to Moderate- High in Stages 3 and 4 and 5.

Conclusions on Landscape and visual

106. The landscape documents provided by the applicant reach credible findings which are supported by reasons and make appropriate recommendations with respect to those findings. As a result, Council Landscape specialist is supportive of the proposal.

107. Council's Landscape Specialist considers latest iteration of the conditions accepted all but the suggested change to 32(h) above. This last recommendation was not accepted on the basis that the change was considered unnecessarily onerous and goes beyond what is strictly necessary to manage potential effects. Council's Landscape Specialist accept this rationale and therefore the draft conditions dated 17 September 2025.

108. There are no significant residual landscape effects that require proportionality assessment.

Stormwater

Applicant's Assessment

109. Although a report specific to stormwater was not lodged by the applicant, they have lodged a series of reports which provide context with how stormwater is to be managed. These include the Assessment of Environmental Effects, Quarry Management Plan, Groundwater & Surface Water Effects Assessment, proposed draft conditions and responses to Council's s67 questions related to stormwater.

Council's Assessment

110. Council's Stormwater Specialist has reviewed the application for potential effects on stormwater (**Annexure 8**)

111. Based on the information provided in the Application documents and the further clarifications received in response to preliminary s67 comments, Council's Stormwater Specialist is satisfied that the proposed stormwater management approach is appropriate for the proposed quarry expansion, subject to the proposed conditions of consent.

112. Accordingly, based on the information available, Council's Stormwater Specialist supports the application.

Conclusions on Stormwater Effects

113. Any adverse effects associated with stormwater can be appropriately addressed through the implementation of amended enforceable consent conditions, recommended by Council's groundwater specialist in their memo – see annexure 8.

114. There are no significant residual stormwater effects that require proportionality assessment.

Air Discharge / Air Quality

Applicant's Assessment

115. An Air Quality Assessment' prepared by Pattle Delamore Partners Ltd (March 2025) has been lodged with the Application. This report assesses the air quality aspects, and in particular dust effects of the proposal.

Council's Assessment

116. The air quality effects matters have been reviewed by Council's Air Specialist (**Annexure 9**) who agrees with the Sutton Block - Air Quality Assessment prepared by Pattle Delamore Partners Ltd, dated March 2025.

117. The air quality assessment for the proposed Sutton Block expansion indicates that:

- The existing receiving environment is well understood and compliant with regulatory standards.
- The potential for adverse air quality effects—particularly from dust—is largely confined to early stages of site development and can be effectively mitigated.
- The proposed mitigation measures reflect best practice and are suitable to be incorporated into enforceable consent conditions.

118. Adverse air quality effects can be appropriately addressed through the implementation of the Dust Management Plan (DMP) which reflects best practice, and the enforceable consent conditions.

119. Council's Air Specialist has confirmed that the proposed air quality-related consent conditions are appropriate to mitigate air discharge effects. They are consistent with the measures in the applicant's existing air discharge consent and reflect good practice in managing dust and particulate emissions from quarrying activities.

Conclusions on Air Discharge / Air Quality

- 120. Any adverse effects associated with air quality can be appropriately addressed through the implementation of the recommended enforceable consent conditions.
- 121. There are no significant residual air quality effects that require proportionality assessment.

Parks

Applicant's Assessment

- 122. A memo titled - Attachment A - Memorandum Response to Auckland Council Parks Queries prepared by Stevesons/Tonkin + Taylor and dated 01 August 2025, was included in the updated documents lodged by the applicant in August 2025.

Council's Assessment

- 123. Council's Parks Specialist has reviewed the application for potential effects on Council-managed open spaces **(Annexure 10)**
- 124. Based on the assessment of the Drury Quarry – Sutton Block Expansion Project, Parks and Community Facilities does not oppose the proposal. The Project does not propose any new public open space or vested assets, nor does it result in direct disturbance to existing Council-managed open space.
- 125. Macwhinney Reserve is the only Council-managed open space directly affected, and the proposed visual mitigation, noise and dust measures are considered appropriate, provided they are secured as conditions of consent.
- 126. Parks and Community Facilities confirm that visual, noise, and dust effects from an amenity purpose on public reserves are appropriately mitigated and that governance processes for ecological offsets are clearly defined and enforceable through consent conditions.

Conclusions on Parks

- 127. Any adverse effects associated with Council managed open spaces can be appropriately addressed through the implementation of enforceable consent conditions.
- 128. There are no significant residual effects on Council managed open spaces that require proportionality assessment.

Noise and Vibration

Applicant's Assessment

129. An Assessment of Noise Effects prepared by MDA (26 March 2025) and a Blast Vibration and Noise Study prepared by Orica New Zealand Limited (12 December 2023) have been lodged with the Application. These assessments evaluate the level (and significance) of the potential noise and vibration effects that would result from the Project.

Council's Assessment

130. The noise and vibration effects have been reviewed by Council's noise and vibration Specialist (**Annexure 11**).
131. The applicant's noise report has concluded that the construction noise and operational noise of the proposed Sutton Block can be managed to achieve full compliance with the AUP permitted construction noise standards and the relevant AUP permitted noise standards for the relevant zoning: Rural – Mixed Rural Zone and Special Purpose – Quarry Zone.
132. MDA advises in their report that the future quarry activity noise may be noticeable for some neighbours (mainly at 291, 337, 347, 354 and 359 MacWhinney Drive) in Stage 3 development, but the noise increases (ranging 3 dB to 7 dB) will occur slowly over 30 years to occur, and the noise levels at the receivers will still fully comply with the AUP noise standards. Therefore, the noise effect is considered to be reasonable.
133. Council's noise specialist agrees with the MDA assessment and conclusions on the noise effects for the proposed operation of Sutton Block. They also consider that the applicants recommended conditions are appropriate.
134. The blast vibration and noise study report prepared by Orica New Zealand Limited has shown that the blasting activity in the future Sutton Block operation can be designed, managed, controlled to meet the AUP blast noise limits and the vibration standards which are referred to DIN 4150-3 1999: Structural vibration – Part 3 Effects of vibration on structures (5 mm/s PPV) and the standards set out in AUSTRALIAN STANDARD AS2187.2:2006 Explosives – Storage and Use, Part 2: Use of Explosives (AS2187.2:2006).
135. Council's noise and vibration specialist has noted that the proposed conditions requiring blast management and monitoring. As a result they consider that the noise and vibration effects from operating the Sutton Block can be managed to a reasonable level.
136. Council's noise and vibration Specialist supports the application overall.

Conclusions on noise and vibration

137. Any adverse effects associated with noise and vibration can be appropriately addressed through the implementation of the recommended enforceable consent conditions.
138. There are no significant residual noise and vibration effects that require proportionality assessment.

Contamination

Applicant's Assessment

139. The applicant has lodged a number of reports associated with contamination which evaluate the level (and significance) of the potential contamination effects that would result from the Project. including:
- Updated- Sutton Block Expansion to Drury Quarry -Preliminary Site Investigation (T+T, 12 January 2024) (PSI)
 - Updated- Sutton Block Expansion to Drury Quarry -Detailed Site Investigation (T+T, 12 January 2024) (DSI)
 - Updated- Sutton Block Expansion to Drury Quarry – Soil Characterisation Investigation (T+T, 12 January 2024) (Soil Characterisation)
 - Updated- Sutton Block Expansion to Drury Quarry – Contaminated Site Management Plan and Remedial Action Plan (T+T, January 2024) (CSMP/RAP)
 - Draft Conditions – Drury Quarry Sutton Block dated 31 March 2025 (Proposed Conditions) and its latest version dated 12 August 2025

Council's Assessment

140. The contamination effects have been reviewed by Council's Contamination Specialist (**Annexure 12**).
141. Councils' contamination specialist considers that the Preliminary Site Investigation (PSI), Detailed Site Investigation (DSI) supplemented with the Soil Characterisation Investigation (CSI), and the Contaminated Site Management Plan (CSMP) and Remedial Action Plan (RAP) have been undertaken in accordance with the requirements of Contaminated Land Management Guidelines No. 1 and 5. The applicant has identified the potential HAIL activities occurred on the Site and largely characterised the sites contamination status.
142. Council contamination specialist considers that the proposed management and controls in the CSMP/RAP are appropriate to the extent and levels of contaminations identified and expected on the site. By implementation of CSMP/RAP and the recommended conditions, any potential health and environmental effects from the earthworks involving soil contamination can be appropriately mitigated to an

acceptable level.

143. Council contamination specialist concurs with the DSI and the Assessment of Environmental Effects (AEE) that since the DSI shows contaminant concentrations in the Site soil are above the published background concentrations, but they are below the applicable NESCS standards in Regulation 7, the proposed soil disturbance triggers a controlled activity pursuant to Regulation 9 of the NESCS.
144. Council contamination specialist concurs with the DSI and the AEE that discharges of contaminants into air, or into water, or onto or into land from the land during the remediation work is permitted under Rule E30.4.1 (A4) since the estimated contaminated soil is likely well below the permitted threshold of 200 m3 and other permitted activity Standards E30.6.1.2 are likely to be met.
145. Council's Contamination Specialist has confirmed that they have reviewed the draft updated conditions dated 12 August 2025. They confirm that their initial review comments on the draft conditions have been fully adopted, including a new draft condition 76 and an advice note have been added as per my recommendations.

Conclusions on contamination

146. Adverse contamination effects can be appropriately addressed through the implementation of the recommended enforceable consent conditions.
147. There are no significant residual contamination impacts that require a proportionality assessment.

Regulatory Engineering

Applicant's Assessment

148. The applicant has lodged a Geotechnical Assessment Report by Riley (both part one and part two) dated 14 January 2025 which evaluate the level (and significance) of the potential geotechnical effects that would result from the Project. They have also submitted a number of reports associated with earthworks and erosion and sediment control (relevance to district earthworks)

Council's Assessment

149. The effects associated with; geotechnical matters and district earthworks have been reviewed by Council's Development Engineer (**Annexure 13**).
150. The geotech Report by Riley dated 14/01/2025, was reviewed, the report provides detailed assessment of EW methodology, slope stability analysis and the requirement for monitoring the slope stability. Continuous monitoring will be beneficial for the day to operation and there will be a negligible effect to any neighbours if followed as per the recommendations of the Geotech report.

151. Erosion and sediment control for district earthwork operations checked and reviewed and satisfies GD05 requirements and are good enough to address E12 – district earthworks trigger only.
152. The traffic effects will only be on the public road and will be assessed by AT liaising directly with the Council Planner. Internal traffic is up to Stevensons to operate efficiently and no issues for DE to check.
153. The application is supported based on the information available as part of the application documents.
154. Council's Development Engineer has confirmed that they have reviewed the draft updated conditions dated 12 August 2025. They also confirm that the draft conditions have incorporated the initial feedback they gave for this proposal. They have confirmed that are happy with the updated proposed draft conditions.

Conclusions on Development Engineering.

155. Any adverse effects associated with Geotechnical matters and district earthworks, can be appropriately addressed through the implementation of the recommended enforceable consent conditions.
156. There are no significant residual geotechnical, district earthworks or internal traffic impacts that require a proportionality assessment.

Planning

Applicant Assessment

157. The applicant has lodged or supplied Council with a number of documents which provide information on planning matters. The most relevant being the Assessment of Environmental Effects by Tonkin and Taylor dated 31 March 2025.

Council's Assessment

158. Planning matters associated with the project have been reviewed by Council's Lead Planner Colin Hopkins (**Annexure 14**).
159. The purpose of Mr Hopkins assessment is to inform the overarching Memorandum of Strategic and Planning Matters for Auckland Council, prepared by Douglas Fletcher, which draws together Council specialist input, identifies information gaps, and provides a summary of assessment outcomes and proportionality conclusions.
160. Mr Hopkins memorandum provides a higher-level planning assessment to support Council's Memorandum of Strategic and Planning Matters. The assessment focuses on the following key areas:
- The reasons for consent

- Identification of relevant planning documents.
- The structure and framing of the proposed conditions of consent.
- The duration of the various consent components; and
- The relationship of the application to existing and related consents.

161. As the overall planning conclusion is dependent on resolution of specialist assessments, Mr Hopkins memorandum does not provide a definitive planning outcome. Instead, it concentrates on planning matters not specifically addressed by Council's specialists and highlights issues relevant to the Panel's consideration.

Conclusions on Planning matters

162. Notwithstanding the recommendations of the council specialists (particularly with respect to Ecology), the outcome of which will be relevant to the overall planning conclusion, in line with the scope of this assessment, Mr Hopkins supports the application, and notes the following:

- The applicant is seeking all necessary consents to give effect to the proposal.
- The mineral extraction activities are acceptable in the context of the objectives and policies of the underlying Rural- Mixed Rural Zone, Rural-Rural Production Zone, and Special Purpose Quarry Zone.
- Notwithstanding the specific matters raised in the council's assessment with respect to the content of the conditions, the applicant has proposed suite of conditions that generally provide the necessary framework to administer the consent and provide an ongoing (and enforceable) structure for the management and monitoring of the activities on site.
- The application appropriately addresses the duration of the various consents.

Watercare Services Limited

Applicant's Assessment

163. The applicant has lodged or supplied Council, the following documents which provide information on how the proposal will interact with infrastructure managed by Watercare Services Limited.

- Drury Quarry – Sutton Block Expansion. Application for Resource Consent and Assessment of Environmental Effects; prepared by Tonkin + Taylor, dated 31/03/2025.
- Email from Jessica Urquhart, Principal Planner Tonkin + Taylor to Doug Fletcher, Principal Project Lead, Auckland Council dated 4.9.2025 and titled "Response to WSL questions on Drury Quarry- Sutton Block questions"

Council's Assessment

164. The effects associated with how the proposal will interact with infrastructure managed by Watercare Services Limited has been reviewed by Watercare Services Limited (**Annexure 15**).

165. A review of the application does not indicate any direct relevance to the

wastewater network. There is no proposed interaction with existing wastewater infrastructure, and no anticipated impact on network capacity or operations.

166. The resource consent application does not involve potable water supply or any proposed connections to the Watercare Services Limited (WSL) network.

167. There are no issues from Watercare's side regarding Hays Creek. The identified dewatering activity at the quarry in Drury does not affect Watercare's interests.

Conclusions on Watercare Services

168. The proposal will not have any adverse effects on the potable water and wastewater infrastructure managed by Watercare Services Limited.

SECTION C: SUMMARY OF ASSESSMENT OUTCOMES AND PROPORTIONALITY CONCLUSIONS

Overview

169. This concluding section provides a brief joint overview of the outcome of the overall Council assessment of the application, based on an objective assessment of the application material as of 24 September 2025.

170. The section is structured as follows:

- **Section 85 adverse impacts / proportionality assessment:** Analysis under section 85(3) of the Fast Track Approvals Act, examining whether adverse impacts are sufficiently significant to be out of proportion to the project's regional or national benefits.
- **Key information gaps:** Identification of residual information deficiencies and their implications for decision-making by the Panel.
- **Key findings:** Again, as at the date of providing these comments (24 September 2025), with our joint recommendation to the Panel.

Section 85 adverse impacts / proportionality assessment

171. Under section 85(3) of the FTAA, the Panel **may** decline an approval where adverse impacts are sufficiently significant to be out of proportion to the project's regional or national benefits.

172. This assessment requires consideration of:

- The nature and significance of adverse impacts identified through the section 81(2) process;
- The project's regional or national benefits as assessed under section 81(4);
- Whether proposed conditions or Applicant modifications could adequately address adverse impacts;
- Whether the proportionality threshold is met even after accounting for mitigation measures, compensation etc.

173. For the avoidance of doubt, the Council's assessment has not identified any reasons why the application **must** be declined in terms of section 85(1) of the FTAA.

Headline issues identified

174. Based on the detailed analysis in **Sections B** above, the following adverse impacts have been identified, individually and collectively, as potentially meeting the section 85(3) threshold:

- **Issue 1: Potential Ecological Effects** - There are numerous concerns regarding the proposed offsets, their calculations as well as meeting the principles of offsetting, particularly proximity, like for like and achieving net gain. Councils Ecologist has identified a number of key information gaps in the application including but not limited to:
 - a) There is insufficient information or proposed offset to have assurance that net gain will be achieved.
 - b) A total of 887 trees are proposed to be planted to offset the loss of 130 large mature relic trees. These 887 trees are reported to be on the Drury site (146 trees), Tuakau site (628) and Hingaia (113). However, the withdrawal of the Hingaia site and the proposed 113 trees has not been addressed.
 - c) Adaptive management is proposed, however thresholds or performance targets when the adaptive management is required are not provided, so it is uncertain what would trigger any adaptive management.
 - d) There is a net loss of 3.3 km of stream from the development. This has not been accounted for.
 - e) The values used in the BCM for the offset wetland value cannot be assessed as there is no evidence presented as to how they are derived

Councils Ecologist has listed ten outstanding Ecology s67 questions. These information gaps may result in adverse effects as they relate to terrestrial ecology and freshwater ecology and are not able to be fully assessed; and consideration given to whether the proposed measures proposed by the Applicant are appropriate

to mitigate or avoid these effects.

- **Issue 2: Potential effects on Auckland Transport infrastructure** - The proposal does not provide appropriate information regarding effects on the roading network, particularly in relation to; damage to the road pavement which will be caused by heavy vehicle movements. Potential congestion and capacity effects relating to high numbers of vehicles travelling to and from the quarry (both trucks and light vehicles), particularly during peak hours; And road safety matters.
AT are unable to complete the full assessment of the proposal ensuring the existing road infrastructure can cater for the proposed activity including truck trips due to insufficient information supplied by the applicant.
AT have listed two outstanding s67 requests which lists information that require to enable an assessment on the likely adverse effects on roading structure and capacity of the roading network.
- **Issue 3: Potential effects associated with Economics** – Although Councils' economist considers it is plausible that the Proposed Consent represents a significant regional benefit for Auckland as described in the FTAA, they also consider that the economic benefits have been overstated and that costs such as economic costs, have not been considered. Therefore, they find it difficult to conclude that the net present value of the Proposed Consent is large.

Project benefits summary

175. The Applicant contends (particularly in their Economic report) that the project will deliver significant regional benefits through the supply of aggregates which are a necessary product in the construction industry, particularly in roading and due to the proximity of the quarry to the large Auckland market which due to the nature of aggregates as heavy and bulky raw materials, avoids costs associated with transporting aggregates which are expensive to move between locations. The report estimates the benefits of the proposal range between \$2.45 billion to \$5.4 billion over the life of the Consent, which represents a significant regional benefit for Auckland as described in the FTAA.
176. However, the Council's assessment – informed by Council economic expert, is that these significant regional benefits may be overstated, and that some reasonably foreseeable costs arising from the Proposed Consent, particularly those outlined in Councils expert ecology and Auckland transport reviews, have not been addressed.
177. No national benefits have been claimed by the Applicant.
178. The assessment of claimed regional benefits has been considered holistically across all adverse impact assessments and informs the tabular proportionality assessment below.
179. This assessment draws on:

- The Applicant's Assessment of Environmental Effects and supporting technical reports, including the Applicant's economic assessment.
- The Council's ecological review by Mr Rossaak (**Annexure 1**);
- Auckland Transport's comments from Mr Prabhakara (**Annexure 2**);
- The Council's economics review by Mr Stewart (**Annexure 3**);

180. In summary, our assessment is as follows:

- a. Mr Stewart acknowledges that the economic report is convincing that demand for aggregates is both large and will continue to grow. However, he states that the economic report makes some assumptions about the demand for aggregates that may overstate the future demand for aggregates in Auckland. Although applicants economic report estimates the benefits of the Proposed Consent range between \$2.45 billion to \$5.4 billion over the life of the Consent. Mr Stewart considers that these benefits are likely overstated because
 - a. The underlying demand estimates are likely overstated.
 - b. The choice of destination of aggregates is not representative of the market.
 - c. The displacement of alternative aggregate sources being solely from out of region sources – ignoring potential Auckland-based sources.
- b. Mr Stewart outlines that there are some reasonably foreseeable costs arising from the Proposed Consent that were not addressed in the applicants economic report, such as potential environmental costs from operations at the quarry site.
- c. With regards to environmental costs. Mr Rossaak has raised questions associated with ecological effects, the adequacy of some components of the applicants' ecological effects assessments and as a result uncertainty with regards to the appropriateness of the applicants' ecological effects management package. These matters need to be investigated and understood further to enable a more conclusive position on whether the adverse ecological impacts and related costs associated with the project are out of proportion to the project's significant regional economic benefits.
- d. Mr Prabhakara has raised questions associated with costs on the roading network from operations at the quarry site, and the adequacy of some components of the applicants' assessments. For example, AT have stated they are unable to complete the full assessment of the proposal ensuring the existing road infrastructure can cater for the proposed activity including truck trips due to insufficient information supplied by the applicant. As a result, uncertainty remains with regards to costs on the roading network. These matters need to be investigated and understood further to enable a more conclusive position on whether the adverse impacts (costs and effects on the roading network from operations at the quarry site) are out of proportion to the project's significant regional economic benefits.

- e. Mr Stewart considers that the avoided costs as outlined in the applicants economic report, such as avoided transport and emissions costs are also likely overstated, but are probably still large. However, the benefits associated with avoided costs must be balanced against the costs that the project imposes (such as the ecological and roading networks costs raised by Mr Rossaak and Mr Prabhakara) As these costs have not been considered in the applicants economic report, it is difficult to come to any conclusion as to whether the proposal represents a net benefit from a welfare perspective.
- f. Mr Stewart states that while it is plausible that the proposal represents a significant regional benefit for Auckland as described in the FTAA, since the benefits have, in his opinion, been overstated and the costs have not been considered it difficult to conclude that the net present value of the proposal is large.

181. Having noted the above matters, even if the Panel were to accept the Applicant's assessment of regional benefits, the Council's assessment is that there remain a number of adverse impacts that need to be understood further to determine whether the adverse impacts are sufficiently significant to be out of proportion to the significant regional benefits.

182. The potential effects of concern, however, primarily relate to areas where we have identified significant information gaps with the Application in its current form, but could potentially be adequately avoided or mitigated subject to the further information being requested and/or conditions of consent. If these matters can be adequately resolved, then we do not foresee there being a proportionality concern in this regard.

Assessment

183. A detailed assessment is provided below in tabular form.

Adverse impacts	Section 85 assessment
1. Potential Ecological Effects	Significance Assessment: As noted in the Freshwater and Terrestrial Ecology memo (Annexures 1) and as set out in further detail within the Key Information Gap table, there are a number of key information gaps in the application. These information gaps result in the adverse effects as they relate to terrestrial ecology and freshwater ecology not able to be fully assessed; and whether the proposed measures proposed by the Applicant are appropriate to mitigate or avoid these effects Regional/National Benefits Considered: See Project Benefits Summary above. Proposed Conditions/Mitigation/Compensation: The details of proposed conditions and adequacy of mitigation measures are not able to be currently ascertained given the significant gaps in the Applicant's ecology assessments to inform these. Proportionality Conclusion: Adverse ecological impacts may potentially be significant and are unable to fully assessed until this information is provided.

2. Potential Effects on Auckland Transport infrastructure	Significance Assessment: As noted in the Auckland Transport memo (Annexure 2) and as set out in further detail within the Key Information Gap table, there are several key information gaps in the application. These information gaps result in the adverse effects as they relate to costs on the roading network from operations at the quarry site, not being able to be fully assessed. Regional/National Benefits Considered: See Project Benefits Summary above. Proposed Conditions/Mitigation/Compensation: The applicant has not offered any limitation on vehicle movements in draft conditions to manage potential costs on the roading network from future quarry operations. The suitability of such an approach cannot be currently ascertained given the t gaps in the Applicant's roading and traffic assessments to inform these. Proportionality Conclusion: adverse effects as they relate to costs on the roading network from operations at the quarry site may potentially be significant and are unable to fully assessed until this information is provided.
---	--

Key information gaps

184. The following table identifies residual information gaps that remain having reviewed the current application material provided including the application documents, and the Applicant's response package dated August 2025, and explains their significance for decision-making. Council considers that this information is necessary prior to determination, and the Panel should request these are provided by the Applicant:

Information gap	Nature of deficiency	Decision-making impact	Risk / uncertainty created
1. AT - Pavement Impact Assessment report along the truck routes.	No pavement Impact Assessment report provided.	Unable to access the adverse effects on the roading structure and to ascertain existing road pavement has adequate capacity to cater for the proposed truck trips.	The road maintenance works are to be rescheduled and incur higher maintenance costs at the rate payers cost. Asset will be affected if the existing structure do not have a capacity.
2. AT - Further detailed assessment is required on the truck trips and assessment on wider network.	The submitted ITA didn't address the potential traffic generation from the undeveloped land ensuring the network and intersections performs safely.	Unable to access the capacity of the road network considering the undeveloped area within the PC 46 area.	This will affect on the network performance e.g. queuing within the network and create congestion.

3. Terrestrial offset	The assessment must be revised and account for increased uncertainty for edge effects. Additional offset area is required as well as improved effects management for avifauna and habitat lost.	These information gaps result in terrestrial ecology effects being unable to be fully assessed.	Uncertainty as to whether the proposed effects management (mitigation + offsetting measures are proportionate to the adverse effects.
4. Stream offset	The offset calculation must be revised to include extent. An appropriate offset site that provides like for like and proximity principles is required.	This information is required to ensure the loss/ modification of streams are appropriately mitigated.	Uncertainty as to whether the proposed effects management (mitigation + offsetting measures are proportionate to the adverse effects.
5. Wetland offset	Calculations must be revised, and an appropriate offset wetland is required to meet the offsetting principles.	This information is required to ensure the loss/ modification of wetlands are appropriately mitigated.	Uncertainty as to whether the proposed effects management (mitigation + offsetting measures are proportionate to the adverse effects.
6. Monitoring, and adaptive management	Management plans must be updated to include the monitoring proposed in the ecological assessments and that any monitoring includes performance targets or thresholds that would trigger the implementation of a detailed adaptive management plan to meet the required and reported outcomes. On the current merits, this application is not supported from an ecological perspective.	This information is required to ensure that any mitigation and or offsetting is delivered in a manner which secures the intended outcomes required to appropriately manage ecological effects.	Uncertainty as to whether the proposed effects management (mitigation + offsetting measures will achieve the anticipated outcomes required to effectively mitigate or offset the adverse ecological effects.
7. Economics regarding Overstating benefits [medium risk]	- The value of the avoided costs in the Applicant's economic assessment may be overstated for three reasons: a. The underlying demand estimates may be overstated, and b. The choice of Penrose as the only processing facility of aggregates, and	The Economic Assessment needs to be detailed and set out in a manner whereby the benefits of the proposal are appropriately quantified	A better understanding of the benefits of the proposal will enable greater certainty regarding how regionally significant the benefits are.

	c. The displacement of alternative aggregate sources being solely from out of region sources.		
	It would be useful if the Applicant's economic expert could provide a range of values for avoided costs with using more moderate assumptions for demand, more efficient locations for processing destinations depending on locations of displaced aggregates, and more reasonable scenarios of alternative locations of displacement of aggregates.	The Economic Assessment needs to be detailed and set out in a manner whereby the benefits of the proposal are appropriately quantified	A better understanding of the benefits of the proposal will enable greater certainty regarding how regionally significant the benefits are.
8. Non-identification of costs [high risk]	No costs were identified in the report but there are potentially very high costs, for example environmental costs, arising from the Proposed Consent. These costs should be identified for a balanced analysis of the net present value of the Proposed Consent to be able to conclude the Proposed Consent is net welfare enhancing over a counterfactual and whether the Proposed Consent represents a (significant) regional or national benefit.	The Economic Assessment needs to be detailed and set out in a manner whereby the costs of the proposal are appropriately quantified	A better understanding of the costs of the proposal will enable greater certainty regarding how regionally significant the benefits are.

Key Findings

185. A number of adverse impacts have been identified in the Council's reporting, which either can be addressed adequately through conditions of consent, or which do not outweigh the project's benefits.

186. However, the Council's assessment has identified the following adverse impacts potentially meeting the section 85(3) threshold, individually and collectively (i.e. where the adverse impacts are significantly significant to be out of proportion to the regional, even after taking into account mitigation etc):

- Potential Ecological Effects** - There are a number of key information gaps in the application. These information gaps result in the adverse effects as they relate to terrestrial ecology and freshwater ecology not able to be fully assessed; and whether the measures proposed by the Applicant are appropriate to address these

effects

2. **Potential effects on Auckland Transport infrastructure** - There are several key information gaps in the application. These information gaps result in the adverse effects as they relate to costs on the roading network from operations at the quarry site, not being able to be fully assessed. .and therefor it cannot be determined whether measures need to be proposed to mitigate or avoid these effects.

Section 85(4) consideration

187. Our assessment has considered that the identified potential adverse impacts if left unresolved cannot be found to meet the section 85(3)(b) threshold solely because they are inconsistent with provisions of specified Acts or other documents. The proportionality assessment is based on the substantive significance of impacts relative to benefits, not (for instance) mere policy inconsistency.

Relevance of information gaps to assessment

188. The identified information gaps (detailed above) create fundamental uncertainty in the assessment.
189. The adverse impacts identified above may not meet the section 85(3) threshold should the information gaps identified be addressed and adequate information provided in response. As such, the information gaps are fundamental to reaching a conclusion with respect to the proposed application.

Recommendation and Conclusion

190. Based on my assessment, I cannot reach a recommendation for the proposed Application at this stage, on the grounds that I have insufficient information to reach a final position.
191. The Application has the potential to generate significant adverse impacts as identified above, particularly in regard to ecology, and Auckland Transport infrastructure, that could be out of proportion to the project's regional benefits, even accounting for proposed conditions, mitigation and / or compensation measures, and the project's claimed regional benefits. The identified information gaps are, however, such that I am unable to reach a conclusion on whether this would be the case. Should these information gaps be adequately addressed, however, I can foresee being supportive of the application, subject to the additional and amended conditions recommended throughout this memo.
192. Other identified potential adverse effects could be adequately resolved through additional conditions of consent.
193. My assessment and this recommendation have been made in accordance with the FTAA. In particular, the assessment has had regard to all matters identified through

the section 81(2) process and has been guided by the statutory purpose of the FTAA to facilitate infrastructure and development projects with significant regional or national benefits. While that purpose directs decision-makers to place greatest weight on enabling such projects, it does not override the requirement to assess whether adverse impacts are sufficiently significant to outweigh those benefits.

194. I consider this recommendation to be consistent with the purpose of the FTAA, which is to enable significantly beneficial projects, not those where adverse impacts are so significant as to outweigh the benefits.
195. I have also given consideration to the purpose and principles in sections 5 to 7 of Part 2 of the RMA. In doing so, I have taken into account that the RMA's purpose is afforded lesser weight than the FTAA's purpose (in section 3, FTAA).
196. It is my assessment that the proposal has not yet demonstrated that it can meet the purpose of the RMA which is to promote the management of natural and physical resources. The proposal has not yet demonstrated that it will avoid or mitigate adverse effects resulting from the proposal on the environment, however subject to further information it is possible it will be able to demonstrate that it does achieve the purpose of the RMA.
197. Subject to conditions of consent relating to delivery and protection of the proposed revegetation and landscaping outcomes, the proposal would be consistent with Section 6.
198. In relation to section 7 of the RMA:
- a. The proposal achieves section 7(a), Tangata Whenua including but not limited to Ngati Tamaoho will have opportunities to exercise their kaitiakitanga by assisting in the proposed ecological mitigation works through the review of draft management plans. This will enable their knowledge, expertise, and practices to be integrated into the final design of these measures.
 - b. The proposal achieves the efficient use and development of natural and physical resources in terms of section 7(b).
 - c. The proposal could maintain and enhance amenity values (section 7(c)), again subject to conditions relating to delivery and protection of the proposed revegetation and landscaping outcomes; and
 - d. The proposal may not maintain and enhance the quality of the environment (section 7(f)), given the unresolved ecological effects that may compromise environmental outcomes.
199. The proposal takes into account the principles of the Treaty of Waitangi, specifically delivering the outcomes sought after by the Treaty Settlement and supporting statutory documents. The proposal would be consistent with Section 8.
200. Overall, the application considered to have the potential to meet the relevant provisions of Part 2 of the RMA or achieve the purpose of the RMA being sustainable management of natural and physical resources, however this has not yet been

adequately demonstrated by the Application due to insufficiencies in the information. While I acknowledge that Part 2 of the RMA is afforded lesser weight than the FTAA's purpose, the proposal's failure (in our opinion, through insufficiencies in the information) to meet the RMA's purpose and a number of important principles reinforces my assessment of the significance of the outstanding information identified.

DATED the 24th day of September 2025



Doug Fletcher

Principal Project Lead, Auckland Council.