

Technical Specialist Memo - Contamination

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

From: Sharon Tang, Senior Specialist, Specialist Unit, Planning and Resource Consents

Qualifications
& Relevant
Experience:

I hold the qualification(s) of: Bachelor of Medicine, Post Graduate Diploma – Environmental Health Sciences, and Master of Public Health, and have **36** years of experience in environmental science and public health fields, with particular expertise in water and wastewater quality, contaminated land, hazardous substances and health risk assessment.

I am a full member of Australasian Land and Groundwater Association (ALGA) and New Zealand Institute of Environmental Health (NZIEH). I have prepared technical assessments for resource consent applications, plan changes, notices of requirement for designation and fast-track applications, and have appeared as an expert witness before consent authorities on multiple occasions.

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: 17 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

- *Application for Resource Consent and Assessment of Environmental Effects – Drury Quarry-Sutton Block Expansion (T+T, 31 March 2025) (AEE)*
- *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*
- *Application Drawings*

3.0 Specialist Assessment

Key findings from the site investigations (PSI & DSI & SCI)

3.1 The preliminary site investigation (PSI) of the site comprises of a review of historical aerial photographs, available geology and hydrology maps, Auckland Council property files and Contamination Enquiry Response, interviews and a site walkover. It has identified that the Site has been subject to the following (potential) activities identified on the Ministry for the Environment's Hazardous Activities and Industries List (HAIL), which have the potential to cause soil/water contamination:

- Potential sheep dip and spray race operations (HAIL A8)
- Progressive deterioration or active disturbance/maintenance of aged buildings or uncontrolled demolition of historical structures, containing lead-based paint and/or asbestos containing material (ACM) (HAIL I, HAIL E1)

3.2 The detailed site investigation (DSI) and the Soil Characterisation Investigation (SCI) show:

- 23 surface soil samples and 12 near-surface samples (0.2m - 0.3m) were collected from the buildings' halo and the potential spray race/sheep dip area and selected samples were analysed for heavy metals, organochlorine pesticides (OCPs) and semi-quantitative asbestos (where deteriorated ACM noted) (DSI);

- 20 additional soil samples (up to 0.3m bgl) collected from 20 grid locations across the wider site were analysed for heavy metals, OCPs and PAHs (SCI);
- The test results of the DSI show lead concentrations in 8 of the 11 surface soil samples collected from the building halos elevated above the Auckland background value for non-volcanic soils. Of which, two lead concentrations exceed the AUP-OP permitted activity soil acceptance criteria specified in Table E30.6.1.4.1. Asbestos fines were not present in the sample analysed;
- The CSI shows that the surface and near-surface materials located at the Sutton Block Drury in general meet the AUP-OP 'Cleanfill' definition with only one sample containing heavy metals above the Auckland background ranges;

Contamination management (CSMP/RAP)

- 3.3 The *Contaminated Site Management Plan and Remedial Action Plan* (CSMP/RAP) has identified the two areas containing lead impacted soil over the AUP-OP permitted activity soil acceptance criteria (Figure 1). The plan proposes to excavate the two remediation areas to natural ground (0.1-0.3m bgl) for offsite disposal followed by validation inspections and sampling;
- 3.4 The CSMP/RAP has specified the roles and responsibilities, set up remediation and validation procedures, site management controls for sediment, erosion and stormwater, dust, stockpiling, re-use of site soils, offsite disposal, importation of fill, health and safety, and response procedures to unexpected discovery of contamination.

Specialist review comments

- 3.5 The proposed quarry pit "Sutton Block" is within the existing large Stevensons Aggregates Limited (SAL) landholdings at Drury and the general surrounding environment is considered less sensitive in terms of soil contamination effects;
- 3.6 I consider that the PSI, DSI supplemented with the CSI, and the CSMP/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 Site contamination status;
- 3.7 Soil contamination has been found largely limited to the surface soil in the halos of the site buildings/structures. Although the CSMP/RAP has not estimated the quantities of the soil requiring remediation or management, the quantities are likely to be small, well below the permitted threshold of 200m³ under Standards E30.6.1.2;
- 3.8 I consider 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;
- 3.9 I concur with the DSI and the 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.

- 3.10 I concur 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.

4.0 Recommendation

I support the application based on the information available.

5.0 Proposed Conditions

Initial condition review comments

- 5.1 I have reviewed the Proposed Conditions provided with the application relevant to the NESCS consent. The proposed C2 requires a CSMP (C7) and RAP (C7) to be submitted to the Council for certification. Since the CSMP/RAP has already been submitted and certified, it is recommended to remove the CSMP and RAP from the list under C2 together with the removal of the proposed C7.
- 5.2 There is a lack of conditions for implementation of certified plans. I, therefore, recommend the following condition:

Condition xxx: Earthworks involving contaminant impacted soil must be conducted according to the *Updated- Sutton Block Expansion to Drury Quarry – Contaminated Site Management Plan and Remedial Action Plan (T+T, January 2024) (CSMP/RAP)*; Any significant variation to the CSMP/RAP must be submitted to the Council for review and certification that it appropriately manages actual and potential soil contamination effects and is within the scope of this consent, prior to implementation;

- 5.3 Demolition of the onsite structures potentially containing ACM is expected, the following advice note is recommended to avoid further soil contamination as a result from the demolition works:

Advice Note: Asbestos Containing Materials

If you are demolishing any building that may have asbestos containing materials (ACM) in it:

- *You have obligations under the relevant regulations for the management and removal of asbestos, including the need to engage a Competent Asbestos Surveyor to confirm the presence or absence of any ACM.*

- *Work may have to be carried out under the control of a person holding a WorkSafe NZ Certificate of Competence (CoC) for restricted works.*
- *If any ACM is found, removal or demolition will have to meet the Health and Safety at Work (Asbestos) Regulations 2016.*
- *Information on asbestos containing materials and your obligations can be found at www.worksafe.govt.nz.*

If ACM is found on site following the demolition or removal of the existing buildings you may be required to remediate the site and carry out validation sampling.

Final condition review comment

- 5.4 I have reviewed the draft updated conditions dated 12 August 2025. I confirm that my initial review comments on the draft conditions specified in point 5.1 to 5.3 have been fully adopted. A new draft condition 76 and an advice note have been added as per my recommendations.