Drury Quarry Sutton Block – Comments Tracker

Name (Lead)	Specialism	S67 Comments	Site visit Required	Preliminary Comments Provided	Preliminary Comments	
Hillary Johnston	Healthy Waters	TBC	No	No	TBC	
Lea Van Heerden (Lombard)	Parks Planning	**1**. Missing Specific Impact Assessments for Numerous Named Public Open Spaces Description of Missing Information: While the application includes general references to "Public Open Space" within the Zone of Theoretical Visibility (ZTV), it does not provide detailed, site-specific assessments for a number of named public open spaces, including: • Barber Road Local Purpose Reserve • Drury Hills Esplanade Reserve • Hingaia Stream Esplanade Reserve • Ngakaroa Reserve • Mercer Reserve • Runciman Reserve • Runciman Sports Complex Reserve • Pratt Road Recreation Reserve • Kern Road Esplanade Reserve • Sinclair Road Esplanade Reserve • Ararimu Cemetery • Pratt Road Cemetery – Te Maketu • Ararimu Hall The only reserve subject to specific impact analysis is Macwhinney Reserve, which is described in relation to visual amenity and screened views. All other reserves are generically referred to as "public open space" without any individualised discussion within the visual, noise, or air quality assessments. Why This Information is Essential: From a parks planning perspective, each public open space provides distinct amenity and recreational values that may be uniquely impacted by the proposed quarry expansion. A comprehensive assessment requires: • Specific visual impact assessments for each reserve to determine the degree of visibility of quarry activities (e.g., haul roads, exposed faces) and their impact on user experience, particularly where panoramic or curated views exist. • Consideration of amenity values, including how dust, noise (e.g., from blasting or machinery), and vibration may impact the tranquility or enjoyment of these spaces. • Analysis of recreational use: It is unclear whether any reserves include walking tracks, picnic areas, or planned future amenities that could be affected.	No	Yes	• Secure conditions for ongoing visual screening maintenance adjacent to Macwhinney Reserve. • Request clarification on the visual amenity impact (if any) on other nearby parks within the ZTV. • Acknowledge ecological mitigation value but note the lack of recreation/open space outcomes – however, this may be a long-term challenge. • No objection from a parks asset management or acquisition perspective, as no new parks infrastructure is created or vested.	

		• Impacts on access: The potential for altered traffic patterns, haul road crossings, or public safety risks that may influence accessibility to or through any of these spaces is not discussed. Without this level of detail, it is not possible to determine whether site-specific mitigation or compensation is warranted, or whether the proposed screening and offset measures are adequate to preserve public enjoyment and use of these community assets. The following question may not be parks-related – Parks and Community Facilities acknowledges that this should be a DOC query and raised with the premium. In some instances, DOC land can be managed by Parks and Community Facilities. However, we are still waiting for confirmation as to who manages the Hingaia Islands. **2**. Unsecured Landowner Approval for Key Ecological Offset on Public Conservation Land Description of Missing Information: The proposal includes approximately 5 hectares of ecological offset planting on Hingaia Islands, which are owned by the Department of Conservation (DoC). However, the application confirms that landowner approval has not yet been obtained. It states that the applicant is "engaging with DoC" and that planting "will not commence until landowner approval has been obtained." Why This Information is Essential: The Hingaia Islands planting is described as a major component of the applicant's offset and compensation package for the loss of streams and wetlands. From a parks and open space perspective, this is particularly significant because: • It involves publicly owned conservation land. • It is presented as a key environmental benefit of the project. • The offset's contribution to regional ecological resilience and habitat enhancement is only meaningful if delivery is guaranteed. If DoC landowner approval is not secured, this element of the offset remains speculative and introduces uncertainty into the mitigation strategy. A parks planner requires assurance that any ecological restoration involving public land is confirmed, achievable, and appropriately governed, particularly where it is being used to justify or balance significant environmental loss elsewhere in the landscape.				
Charlie Song	Watercare	TBC	No	No	TBC	
Nagaraj Prabhakara	Auckland Transport	1. The applicant hasn't provided any assessment on the existing roading structure ensuring existing roading structure can cater for the additional truck movements without creating any road safety issues for the other road users. According to Austroads section 12 guidelines, developments that create more than 10% heavy vehicle movements warrant an pavement impact assessment. Section 6.2 of the ITA states that the current proposal will increase truck movements from 600-700 on an average day to 1,200-1,400 trucks per day. The current proposal will have a net increase of 200% high commercial vehicles (HCV). Please provide a	No	NO		

		pavement impact assessment along the intended truck routes, ensuring the existing road structure can cater for the additional truck movements/loads and have no detrimental effects on the life of the road structure. 2. Section 3.1 of the Integrated Traffic Assessment (ITA) states that proposed quarry operational trucks intend to use two routes for getting access between the quarry and the motorway. The second route is between the site and the SH22/SH1 interchange to the north. Please provide an assessment on the second route (Quarry Road including intersections of Quarry Road /Great South Road and Great South Road /SH22) to ensure the existing network has adequate capacity and no potential safety and operational issues from the proposed additional truck movements. AT understands that resource consent and engineering application approvals have been obtained by the other developer for the Quarry Road closure including extension of Maketu Road extension and bridge construction within the Maketu Road extension. There will be a period of Quarry Road closure from the bridge construction as well as impacts from other developments in the area. Therefore, quarry trucks will be fully assigned to the south route. This would mean 100% of trips will have to use the south route, please provide an assessment based on the entire trucks will have to use the south route. 3. It is unclear whether the quarry traffic will be using Fitzgerald Road. Please confirm quarry traffic will be using Fitzgerald Road. An assessment of Fitzgerald Road will be required if the quarry traffic intends to use Fitzgerald Road for the quarry operation. 4. Truck routes to Ramarama interchange transverses through Maketu Road/John Main Drive. Please provide an intersection analysis including capacity analysis at this intersection to ensure no potential adverse roading network operational issues from the additional truck movements at this intersection. 5. The Drury South Area is not yet fully developed. Please provide transport assessments with a scenario (including transport modelling of the scenario) including the full buildout of the Drury South development which represents future traffic conditions which will exist during the life of the development, not only the current traffic volumes and the traffic conditions for the surrounding area. This information is required to have a better understanding of the existing road network capacity and potential adverse impacts. The ITA document does not clearly include the Drury South fully developed scenario for its modelling. There is reference to the PC46 ITA on page 8, but it is not clear how these values were calculated or applied. The applicant needs to provide a detailed assessment of the likely traffic volumes for the Drury South fully developed scenario as part of the current application. If the applicant relies on earlier traffic modelling from PC46, please provide the modelling details and explain clearly how it was calculated and applied. 6. Pages 8 & 9 of ITA states that Level of service (LOS) D is acceptable at the existing two signalised intersections, but according to AT's Network Operating Plan, on arterial roads the minimum LOS during peak periods is C. Please provide an updated assessment on the LOS of the network to				

		ensure that to ensure that no potential adverse impact on the roading operation. 7. Please provide the copies of the Movement Summary Tables and Traffic Signal Phasing and Timing reports from SIDRA so that AT can confirm the traffic volumes on each leg of the intersections are reasonable and assess the potential average delay, queue lengths, and LOS for individual movements. Why is this Information Essential? The absence of this information significantly limits Auckland Transport's ability to assess the full extent of adverse effects on the transport network.				
Laura Scaife & Sian Farrell	Env Monitoring	No	No	Yes	**Comment on Proposed Conditions** **General Comments** • **Deemed certification** – Environmental Monitoring strongly oppose any condition that suggests a mechanism for "automatic certification". Conditions should not be worded in a way that holds Council (the regulatory Authority) to a specific timeframe for any confirmation or certification. Conditions should not include an obligation on behalf of the Council – we are not the consent holder and we are not beholden to them. Management plans are a useful and accepted resource management tool for dealing with certain environmental effects of a proposal. Typically, a 'draft' management plan is provided as part of the consent process with a 'final' management plan being provided to, and certified by, the Council as a condition of consent. The Council appreciates that many projects are time-critical and that delays in the certification process can have flow-on consequences to the final delivery of the project. However, the certification of final management plans by the Council is a key step in ensuring that the environmental outcomes, as assessed and approved under the resource consent are achieved. • **Consistent referencing** - Consistent referencing to Council throughout to avoid confusion as to who is certifying and / or receiving information for these consents. • **Consistent reporting** – Consistent report to Council throughout to avoid confusion. Recommend quarterly reporting for all operational reporting in the consent. • **Consistent formatting and wording** - Conditions should adopt standard Council formatting and wording – this will ensure the effectiveness of monitoring the consent and to assist with administration associated with the consent. • **Conditions tagged to respective consent types -** It is recommended that conditions are broken down into respective consents for efficient monitoring and to ensure pre-start requirements for each consent can be met, along with ongoing requirements. For example: specific conditions for LUC, specific conditions for WAT, conditions that apply to all consents. There appear to be no consent conditions for the contaminated land, stormwater, and stream works reasons for consent. **Part B – General Conditions** • B5 – Recommend adding the expiry date for the regional earthworks consent. • Recommend addition of S108 covenant condition to protect all planting completed under this consent. **Part C – Management Plans**	

					• Recommend adding a condition to cover that any amendments to management plans need to be certified by Council prior to implementation. • C3 – recommend remove deemed certification condition. • C11 – recommend addition of maintenance programme once planting is completed. • C11 – recommend addition of time bound contingency plan for any planting that does not establish. • C24 – Closure and rehabilitation plans – it is unclear what "only to be included within 5 years of confirmed closure" means. Is this 5 years before or after the closure? It is recommended that this needs to start being implemented from the date of closure. **Part D – Construction works** • D2 – Recommend including that all devices and controls must be constructed in accordance with the approved erosion and sediment control plan. Further, we recommend no further earthworks are to proceed until the devices have been certified. • D4 - (c) recommend the Earthworks and Streamworks Monitoring Officer is also notified within 24hrs of becoming aware of the failure. **Part E – Operational conditions** • Recommend add condition that a siren must sound prior to each blast. • Recommend add condition that blasting activities are restricted to between 9am-5pm Monday to Saturday aligning with the AUP(OP). • Recommend additional condition for one-off noise measurements to be undertaken by the consent holder to ensure compliance with the noise standards. • These conditions / changes are recommended due to past experience with monitoring quarrying activities in proximity to residential properties. **Part F – Air Discharge Consent Conditions** • F2 – recommend removal of advice note. The enforcement officers do not need to be trained to determine if dust or odour is objectionable. • Recommend add condition that all continuous dust monitoring results be submitted to Council on a quarterly basis. • Recommend add S128 review condition in case of adverse environmental effects from activity. **Part G – Groundwater Consent Conditions** • G7C - Recommend change Manager to Council. • G10 – Recommend change Team leader to Council. • G14 – Recommend change Manager to Council. • G14 – Recommend Condition G1a be reported quarterly. All other reporting in section G to remain annually. • Recommend add S128 review condition in case of adverse environmental effects from activity. **Part H – Monitoring and Annual Reporting** • Recommend changing annual reporting to quarterly (except for the groundwater monitoring and H6-H9). • Recommend separating quarterly, annual and 5 yearly monitoring reporting. • H1 – Recommend change Manager to Team Leader Environmental Monitoring monitoring@aucklandcouncil.govt.nz. • H1 – Recommend quarterly reporting instead of annually. • H1 – Recommend including air quality reporting. • H3 – Recommend report to be submitted quarterly or as agreed with Team leader Environmental Monitoring. Also recommend that 15mm rain event be changed to 25mm or more and exclude surface flow aspect.	

					Recommend condition includes how the rain event will be determined (i.e., an onsite rain gauge or the nearest Council rain gauge). • H9 – Recommend change reporting timeframe to 3 months after required monitoring dates. • Recommend adding a condition to implement a Community Liaison Group (CLG) for this stage as this section of the quarry will back onto residential housing. Past experience shows that this type of activity generates a lot of interest with neighbours.	
Colin Hopkins	Consents Plannner	TBC	TBC	TBC	TBC	
Abhi Pandith	Development Engineer	No	No	Yes	• Re Flooding and OLFP – DE to rely on comments from Healthy Waters and SWWWITA team. • Geotech Report by Riley dated 14/01/2025, reviewed, the report provides detailed assessment of EW methodology, slope stability analysis and the requirement for monitoring the lope stability. Continuous monitoring will be beneficial for the day to operation and there will be a negligible effect to any neighbors if followed as per the recommendations of Geotech report. Geotech specialist John Newsome also helped with the review of the report. Earthworks sediment control operations checked and reviewed and satisfies GD05 requirements and are good enough to address E12 triggers only. • The traffic effects will be only on the public road will be delt by AT liaising directly with the planner and it is okay, internal traffic is upto Stevensons to operate efficiently and no issues for DE to check. Flooding and SW items will be assessed via the planner Comment on Proposed Conditions Abhi is happy with the conditions proposed conditions but would like to add one more. 1. All Earthworks operations must be supervised by a suitably qualified engineering professional. In supervising the works, the suitably qualified engineering professional must ensure that they are constructed and otherwise completed in accordance with Geotechnical Assessment report by Riley dated 14/01/2025, Certification from a suitably qualified engineering professional responsible for supervising the works must be provided to Council, confirming that the works have been completed in accordance with condition 5 within ten (10) working days following completion. Written certification must be in the form of a geotechnical completion report, or any other form acceptable to the council.	
Andrew Rossaak (Morphum)	Freshwater and Terrestrial Ecology	Based on my review of the ecological documents, a fully informed review of the ecological effects and management thereof cannot be made due to the following gaps in the information provided: <u>1. Terrestrial ecology</u> a. An assessment of how the altered water table will affect the success of existing and offset native biodiversity vegetation surrounding the pit. b. An understanding of how the outcomes will be secured through monitoring and adaptive management over the 30 plus year timeframes as the consent will be discharged once the covenants are secured in a much shorter period. <u>2. Freshwater streams</u> a. An assessment of the risks to existing covenanted offsets within the quarry zone/site, particularly downstream of stream 4. This should include, but not be limited to, a detailed monitoring and adaptive	YES	No		

		management plan to demonstrate how this offset (ecological values) will not be compromised by the proposed works. b. The application material states that streams (stream 4) will be augmented to maintain flows, however, it is unclear how this will be achieved and assured in perpetuity. c. The Ecological Impact Assessment (EcIA) does not address how the loss of stream extent is managed through the effects management hierarchy - the proposal has a net loss in stream length (it is noted stream values are accounted for through the use of the Stream Ecological Valuation (SEV) method). d. There are no details in the EcIA for the culvert proposed on stream 4 or the diversion. It would be anticipated that details on the diversion stream such as instream structures that have been proposed, riparian planting in both long and cross section plans and SEV would be provided. In addition, culvert details and how fish passage will be achieved are also not noted. e. The culverts that are reported to be removed on the Peach Hill offset streams are not detailed or apparent in the offset. f. The application material does not include the Stream Ecological Valuation (SEV) calculator in excel format. g. There is no streamworks management plan to provide detail on how and where the rock (and large wood) proposed to be installed in the streams as part of the offset of values will be undertaken. <u>3. Wetlands</u> a. The assessment of potential values does not meet the assessment of values required under the NPS:F b. Wetland hydrology may be impacted for wetlands 2a south, 3 and 8 given the area of influence provided the Ground and Surface Water Report. An assessment for the potential loss of hydrology on these wetlands and adaptive monitoring is expected. <u>4. Offsets</u> a. There is uncertainty that the offsets are possible and meet additionality. Request evidence that the proposed offset sites are consistent with the additionality concept (eg. Letter from te Waikato River Authority and Hingaia Island has capacity as there are already numerous offsets consented at this location). <u>Why is this Information Essential?</u> 1. The application involves the loss of habitat and biodiversity associated with freshwater features (streams and wetlands) as well as terrestrial vegetation. The assessment of the loss of values, both existing and potential are required: a. The National Policy Statement for Freshwater Management 2020 (amended October 2024 (NPS:F) provides, in the definitions, the loss of value in relation to rivers, and specifies the following existing or potential values: i. ecosystem health				

		ii. indigenous biodiversity iii. hydrological functioning iv. Māori freshwater values v. amenity values The assessments do not provide a complete assessment for the above for the current and potential values. b. The Auckland Unitary Plan E3.8.1 requires assessments of the effects on ecological, hydrological, recreational, cultural and natural character values (existing and potential) [emphasis added] of the lake, river or stream or wetland, and its catchment. 2. Require evidence to demonstrate that the diversion stream will not result in a loss of ecological values. 3. The NES:F and AUP require an assessment of value and extent (AUP 3.3.4 and NPS:F section 3.24*: the council is satisfied that:(i) the applicant has demonstrated how each step in the effects management hierarchy will be applied to any loss of extent or values of the river (including cumulative effects and loss of potential value), particularly (without limitation) in relation to the values of: ecosystem health, indigenous biodiversity, hydrological functioning, Māori freshwater values, and amenity; and*.... 4. Surface and groundwater report indicated an altered soil hydrology. 5. The SEV calculators are required to be reviewed to confirm that the SEV scores have been calculated and interpreted correctly. The concern being that the proposed enhancements may be overstating, or double counting, the benefits and therefore not reporting the correct level of effect. 6. The AUP E15.8.2 (3) provides particular assessment criteria for Vegetation alteration or removal within a significant ecological area within a Special Purpose Quarry Zone, and effects management thereof, including *whether the scale or location of the activity will significantly affect water quality or quantity and the habitat value of waterways or wetlands*.				
Hillary Johnston	Stormwater, Industrial Trade Activity (SWWWITA team)	This specialist response identifies critical information gaps that prevent proper assessment of the activity and development proposal under the following subheadings: 1. Total Impervious Area 2. Stormwater Management Plan or Report 3. Sizing of the Sutton Block Pit Sump 4. Capacity of the Existing Drury Quarry Water Treatment System 5. ‘Clean Water’ Discharge to Stream 6. Industrial or Trade Activities 7. Water Quality Monitoring 1. TOTAL IMPERVIOUS AREA 1.1. The application does not clearly state the total proposed impervious area to be established as part of the Sutton Block development, nor clarify whether this is limited to the haul roads or includes other features such as internal roads, vehicle parking, or processing areas. Why is this Information Essential? - Without this information, it is not possible to assess the likely stormwater runoff volumes or determine	No	No		

		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). 2. STORMWATER MANAGEMENT PLAN OR REPORT 2.1. The application does not include a standalone stormwater management plan or stormwater management report. Instead, relevant information in respect of stormwater management is dispersed across the AEE and supporting technical assessments. Why is this Information Essential? - The absence of a consolidated stormwater management plan or report limits the ability to clearly understand how stormwater will be managed across the various stages of the quarry, how dirty versus clean water is measured, monitored, and separated, the treatment standards applied, and how compliance with GD01/GD05 is achieved. A technical stormwater report or management plan would provide necessary clarity on water flow, device capacities, stormwater measurement and/or monitoring, and performance of proposed treatment devices. 3. SIZING OF THE SUTTON BLOCK PIT SUMP 3.1. The application does not include any technical explanation or hydraulic calculations to demonstrate how the Sutton Block pit sump has been sized in relation to predicted inflows from rainfall, stormwater runoff, groundwater dewatering, or water reuse demand. Why is this Information Essential? - Without a technical basis for the pit sump sizing, it is not possible to assess whether it has adequate capacity to capture and treat water during storm events or to prevent overtopping or uncontrolled discharges, particularly as the pit deepens over time. This limits confidence in the overall effectiveness of the water management system and the mitigation of downstream effects. 4.CAPACITY OF THE EXISTING DRURY QUARRY WATER TREATMENT SYSTEM 4.1. While the AEE outlines that the existing Drury Quarry water treatment system (including the lamella and clean water pond) has 'significant extra capacity', it does not quantify this capacity or confirm how much of this capacity will be allocated to or consumed by the Sutton Block operations. Why is this Information Essential? - Without quantification it is unclear whether the Drury Water Management System can accommodate peak flows from both the existing and proposed quarry pits operating simultaneously (particularly during the crossover period), or during high rainfall periods. This introduces uncertainty in the ability of the existing Water Management System to provide mitigation simultaneously from both pits during any cross over period to avoid adverse effects on receiving waters. 5.'CLEAN WATER' DISCHARGES TO STREAM 5.1 - The Application does not clearly identify any limits or restrictions on the volume, frequency, or rate of 'clean' water discharges from the Sutton Block pit or clean water pond into Stream 4 (NT1). The Application does not include an assessment of the hydrological or ecological effects of potentially large, sustained, 'clean' water discharges to the stream or				

		the difference in flow regime compared to a natural, baseflow driven stream condition. Why is this Information Essential? - Without an assessment of whether discharge volume limits would be appropriate, or an assessment of the downstream effects of potentially large clean water discharges (including temperature, flow variability, erosion potential), it is not possible to determine whether the proposed discharges could cause erosion, alter downstream form or function, or affect aquatic habitat. Further analysis is required to support claims that the proposed discharges to the stream will not result in 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. 6. INDUSTRIAL OR TRADE ACTIVITIES 6.1 - The Application does not identify whether any industrial or trade activities (ITAs) are proposed within the Sutton Block expansion area, nor does it confirm whether any discharges from existing or future ITA's (e.g. concrete batching, perlite processing, or vehicle washdown) will occur within the catchment contributing to the new stormwater discharges. The application does not state whether additional ITA consents are sought for activities associated with the expanded quarry operations. Why is this Information Essential? - Without confirmation of whether there will be additional or expanded ITA's it is not possible to determine whether the correct consents have been sought or whether appropriate mitigation and treatment measures have been proposed. 7. WATER QUALITY MONITORING Description of Missing Information 7.1 - While the Application proposes conditions to monitor groundwater levels and quality, it does not propose any conditions to monitor the quality of other discharges from the site or to monitor water quality within the receiving environment (i.e. Stream 4/NT1). There is no monitoring framework or subsequent trigger-response approach proposed. Why is this Information Essential? - Without conditions requiring water quality monitoring at discharge points and within the receiving environment, there is no mechanism to verify that discharge quality remains consistent with the Application and associated assessments. There is no mechanism to detect and respond to potential adverse effects over time. Monitoring is particularly important given the large-scale earthworks, proposed stream reclamation, and sustained discharges of both treated and untreated water from the pit system.				
Philip Kelsey	Groundwater and dewatering	<u>A - Regional Groundwater Drawdown Predictions</u> Missing Information 1. Stage 5 maximum groundwater drawdown contours within the 7.5 kilometre zone of influence, incorporating cumulative drawdown effects from consented Drury and Hunua quarries. 2. A plan showing all stream reaches expected to be subject to baseflow reduction associated with Stage 5 groundwater drawdowns, including cumulative effects from Drury and Hunua	No	No		

		quarries. (Please show on plans at a suitable scale. The 1:70,000 scale drawings provided are very difficult to read.) Why is the Information Essential? • The requested information is required to determine the effects on existing groundwater bores and streams, plus verification of proposed monitoring for groundwater and surface water. <u>B - Groundwater Drawdown and Ground Settlement West of Drury Fault</u> Missing Information 3. Assessment of potential groundwater drawdown and ground settlement effects west of the Drury Fault from expected deep greywacke drawdown to RL-55m within the adjacent Hunua and Drury greywacke blocks. 4. Groundwater level monitoring west of the Drury Fault. Why is the Information Essential? • Closest ground conditions which are prone to groundwater drawdown related settlement consist of compressible Tauranga Group sediments which are extensive under the Drury Flats. Significant development has taken place in this area. • Figures 6 and 7 of PDP (2025)1 1 PDP (2025). Proposed Sutton Block Expansion – Groundwater and Surface Water Effects Assessment. Report prepared for Stevensons Aggregate Limited. March 2025. show predicted Hunua and Drury greywacke block drawdowns to RL-55m, significantly below Drury Flats groundwater levels to the west of the Drury Fault. Such drawdowns could result in leakage across the buried Drury Fault scarp. Figures 6 and 7 of PDP (2025) show the Drury Fault as a linear feature bounding the greywacke block geology to the ground surface. This is a buried fault scarp that may have been subject to past erosion resulting in local removal of the Hunua Fault barrier. <u>C - Groundwater Supply Bores</u> Missing Information 5. Specific assessment of in-well drawdown effects (incorporating pump depths and water supply demands) on existing water supply bores within the zone of influence. 6. Identification of potentially affected water supply bore owners, including those with consented takes. Why is the Information Essential? • Predicted groundwater drawdown on existing water supply bores is high and up to 120m. Existing PDP bore effects assessment based on predicted groundwater drawdown and bore depths only. This is insufficient to assess quarry drawdown effects on existing bore owners.				

		• Existing bore database presented in Appendix H includes many investigation bores which are not water supply bores, and possibly many that are no longer used. These need to be removed. <u>D - Augmentation Flow Water Quality</u> Missing Information 7. Water treatment standard for stream augmentation from groundwater. Confirmation of treatment to achieve ANZECC 95% Ecosystem Protection Levels. Why is the Information Essential? • Table 9 (PDP, 2025) shows Sutton Block deep greywacke groundwater exceeds ANZECC 95% triggers for nitrate and metals. Water treatment of groundwater is mentioned in PDP (2025) but not specified. <u>E - Stream Augmentation – Cumulative Effects</u> Missing Information 8. Clear methodology in determining the cause of baseflow reduction in terms of Hunua or Sutton Block quarries for Hays and Symonds Streams. Why is the Information Essential? • PDP (2025) for the Sutton Block Expansion estimates loss of baseflows of 1,747m^3/d for Hays Stream and 708m^3/d for Symonds Stream. Both of these streams are monitored by Winstones as part of the Hunua Quarry consents. Methodology requested to determine cause of baseflow reduction and partly responsible for mitigation. <u>F - Post Quarrying Augmentation of NT1 Stream</u> Missing Information 9. Proposed post-quarrying mitigation of loss of baseflows to NT1 Stream as a result of greywacke aquifer removal from quarry excavation within catchment. Why is the Information Essential? • PDP (2025) estimates the total loss of baseflows to the NT1 Stream as a result of quarrying is 474m^3/d. While augmentation is proposed during quarry operations from quarry sump pumping, no post-quarrying mitigation is provided.				
Sharon Tang	Contamination	No	No	Yes	Specialist Assessment. 3.1 - The preliminary site investigation (PSI) comprises of a review of historical aerial photographs, available geology and hydrology maps, Auckland Council property files and Contamination Enquiry Response, interviews and a site	

					walkover. It has identified that the site has been subjected to the following (potential) HAIL activities: • Potential sheep dip and spray race operations (HAIL A8) • Progressive deterioration or active disturbance/maintenance of aged buildings or uncontrolled demolition of historical structures, containing lead-based paint and/or asbestos containing material (ACM) (HAIL I, HAIL E1) 3.2 The detailed site investigation (DSI) and the Soil Characterisation Investigation (SCI) show: • A total of 23 surface soil samples and 12 near-surface samples (0.2m - 0.3m) were collected on 9 Jan 2022 from the buildings' halo and the potential spray race/sheep dip area and selected samples were analysed for heavy metals, organochlorine pesticides (OCPs) and semi-quantitative asbestos (where deteriorated ACM noted) (DSI); • Surface and sub-surface soil samples (up to 0.3m bgl) were also collected in February 2022 from 20 grid locations across the wider site with selected 20 soil samples being analysed for heavy metals, OCPs and PAHs (SCI); • The DSI shows elevated lead concentrations recorded in 8 of the 11 analysed surface soil samples collected from the building halos above the Auckland background value for non-volcanic soils. Of which, two lead concentrations exceeded the AUP-OP permitted activity soil acceptance criteria specified in Table E30.6.1.4.1. Asbestos fines were absent in the sample analysed. • The CSI concluded that the surface and near-surface materials located at the Sutton Block Drury complied with the AUP-OP 'Cleanfill' definition (only one sample was recorded heavy metals above the Auckland background ranges); 3.3 The CSMP/RAP has identified the two areas containing lead impacted soil over the AUP-OP permitted activity soil acceptance criteria (Figure 1). The plan proposes to excavate the two remediation areas to natural ground (0.1-0.3m bgl) for offsite disposal followed by validation inspections and sampling. Although the CSMP/RAP has not estimated the volumes of the soil requiring remediation or management, the quantities appear to be relatively small; 3.4 The DSI/RAP has specified the roles and responsibilities, set up remediation and validation procedures, site management controls for sediment, erosion and stormwater, dust, stockpiling, re-use of site soils, offsite disposal, importation of fill, health and safety, and response procedures to unexpected discovery of contamination; ➢ 3.1 I consider that the PSI, DSI supplemented with the CSI, and the CSMP/RAP have in general been undertaken in accordance with the requirements of *Contaminated Land Management Guidelines No. 1 and 5.* The PSI has identified the potential HAIL activities on the Site. The DSI and the CSI indicate that the extent of soil contamination is limited to the halos of the site buildings/structures. ➢ 3.2 Based on the limited lead contamination around the buildings' halos over the and the AUP-OP permitted activity soil acceptance criteria, I consider that CSMP/RAP has taken a conservative approach to	

					remediate the lead impacted soil through offsite removal. Since the volume of impacted soil is likely to be well below the permitted 200m3, re-use of the soil together with other soil containing low levels of contaminants is likely to be acceptable. ➢ 3.3 I concur with the DSI and the AEE that since the DSI shows contaminant concentrations in the soil on a piece of land above the published background concentration but below the applicable NESCS standard in Regulation 7 of the NESCS, the proposed soil disturbance and changing use of the piece of land trigger a controlled activity pursuant to Regulation 9 of the NESCS. ➢ 3.4 I concur with the DSI and the AEE that the proposed earthworks can be undertaken as a permitted activity pursuant to rule E30.4.1 (A4) since the permitted activity Standards E30.6.1.2 are likely to be met. ➢ 3.5 I consider that by implementation of the CSMP/RAP, and the recommended consent conditions, any potential health and environmental effects from the proposed earthworks can be appropriately mitigated to an acceptable level. 4. **Comments on Proposed Conditions** 4.1 - I have reviewed the Proposed Conditions relevant to the NESCS consent. The proposed C2 requires a CSMP (C7) and RAP (C7) to be submitted to the Council for certification. Since the CSMP/RAP has already been submitted and certified, it is recommended to remove the CSMP and RAP from the list under C2 together with the removal of the proposed C7. 4.2 - 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 CAMP/RAP must be submitted to the Council for review and certification that it appropriately manages actual and potential soil contamination effects and is within the scope of this consent, prior to implementation; Advice Note: Asbestos Containing Materials • *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.*	

Louis Boamponsem	Air Quality / Discharge	No	No	Yes	***3. Potential Air Quality Effects*** The primary air quality concern associated with the proposed Sutton Block expansion is dust generation, particularly TSP, PM_{10}, and respirable crystalline silica (RCS). Key dust-generating activities include: • Earthworks and overburden removal (e.g., wind erosion from exposed surfaces, stockpiles, and material loading) • Aggregate extraction and blasting (release of fine and coarse particulates) • Haul road traffic (dust entrainment from unsealed surfaces) • Portable crushing operations (if deployed on site) Under worst-case, unmitigated conditions, coarse dust could disperse several hundred metres—especially during strong south-westerly winds—potentially affecting nearby sensitive receptors such as residential properties on Macwhinney Drive (R1 and R2, approximately 130–300 m downwind) and the culturally significant Kaarearea pā site (R4, approximately 80 m downwind). Finer PM_{10} particulates are expected to disperse over a wider area but remain below health-based thresholds beyond approximately 200 m. The assessment acknowledges adjacent industrial sources but does not model cumulative particulate impacts from Drury South or other nearby operations. ***4. Summary of Potential Air Quality Effects:*** • Short-term impacts during initial overburden stripping and bund construction pose the greatest risk, particularly to R2 and R4. • Cumulative effects from concurrent Sutton Block and Drury Quarry operations may increase dust events at R4, though such events are unlikely to occur simultaneously. • Health risks from PM_{10} and RCS are predicted to remain within acceptable thresholds (e.g., RCS ≤ 2.8 µg/m³, below the 3 µg/m³ guideline). ***5. Proposed Mitigation Measures*** SAL proposes to adopt a detailed Dust Management Plan (DMP) for the Sutton Block, modelled on the controls successfully implemented at the existing Drury Quarry site. Key mitigation measures include: • Water carts and fixed sprays on haul roads, stockpiles, and exposed surfaces, with conditioned use during dry and/or windy periods • Enforced vehicle speed limits of 30 km/h to minimise entrainment • Progressive bunding and re-vegetation of overburden mounds within three months of placement • Real-time PM_{10} monitoring, integrated with telemetry and response triggers • Annual DMP review to incorporate adaptive management and industry best practices Provided that crushing activities remain confined to the existing fixed plant area, the residual risk of dust impacts on downwind receptors is expected to be minor and manageable. ***6. Regulatory Compliance*** The proposed activity demonstrates good alignment with applicable regulatory requirements: • The proposal meets Auckland Unitary Plan (AUP) standard E14.6.2.2 (minimum 200 m setback for crushing operations) and complies with the Quarry Buffer Overlay provisions.	

					• Predicted PM_{10} concentrations (22.6–45.1 µg/m³) are below the National Environmental Standards for Air Quality (NESAQ) 24-hour threshold of 50 µg/m³. • The assessment applies the FIDOL framework (Frequency, Intensity, Duration, Offensiveness, Location) consistent with the MfE Good Practice Guide for Assessing and Managing Dust (2016). ***7. Conclusion*** The air quality assessment for the proposed Sutton Block expansion indicates that: • The existing receiving environment is well understood and compliant with regulatory standards; • The potential for adverse air quality effects—particularly from dust—is largely confined to early stages of site development and can be effectively mitigated; • The proposed mitigation measures reflect best practice and are suitable to be incorporated into enforceable consent conditions; • With appropriate implementation and ongoing monitoring, the air discharge effects of the expansion are expected to remain minor and well-controlled. In view of the above assessment, I support the application. **4. Comment on Proposed Conditions** The proposed air quality-related consent conditions below are appropriate to mitigate air discharge effects. They are consistent with the measures in the applicant's existing air discharge consent and reflect good practice in managing dust and particulate emissions from quarrying activities. ***Part F – Air Discharge Consent Conditions*** F1 Limit Conditions All processes must be operated, maintained, supervised, monitored and controlled, including by adhering to the Dust Management Plan certified in accordance with the conditions of this consent, to ensure that all emissions authorised by this consent are maintained at the minimum practicable level. F2 Beyond the boundary of the site, there must be no dust caused by discharges from the Site which, in the opinion of an enforcement officer when assessed in compliance with the Good Practice Guide for Assessing and Managing Dust (Ministry for the Environment 2016), causes noxious, dangerous offensive or objectionable effect. Advice Note: Dust effects *Compliance with this condition is to be assessed by suitably trained council enforcement officers in accordance with the procedures outlined in the Good Practice Guides for Odour and Dust (Ministry for the Environment, 2016), including consideration of the FIDOL factors (frequency, intensity, duration, offensiveness and location).* F3 Discharges from any activity occurring on the Site must not give rise to visible emissions, other than water vapour or heat haze, to an extent which, in the opinion of the council, is the cause of a noxious, dangerous, offensive or objectionable effect.	

					F4 Beyond the boundary of the Site, there must be no hazardous air pollutant caused by discharges from the Site, which is present at a concentration that causes, or is likely to cause adverse effects to human health, ecosystems or property. F5 No crushing activities must occur within 200 m of 359 MacWhinney Drive, within the area demarcated purple on Figure 7 of the 'Sutton Block - Air Quality Assessment' prepared by Pattle Delamore Partners Ltd, dated March 2025 and shown in Figure 1 below. Figure 1: 200 m crushing exclusion area within the Project's footprint. F6 The crushers must not be operated without the associated water sprayers being fully operational and functioning correctly. All dust control equipment on the Site must be maintained in good condition. F7 All practicable measures must be undertaken as detailed by the DMP, certified in accordance with the conditions of this consent, to minimise the discharge of dust beyond the boundary of the site. These measures must include, but not be limited to: (a) Frequent watering of unsealed surfaces where discharges of dust are likely to arise; (b) Restricting vehicle speeds around the site; (c) Maintaining unsealed surfaces of vehicle routes where discharges of dust are likely to arise through grading and rolling to minimise dust, and stabilisation of exits from unsealed surfaces onto sealed roads; (d) The maintenance of wheel washing facilities at the site exit, utilised by vehicles as required to minimise the tracking of dust-generating material on paved surfaces and public road; and. (e) Locating and maintaining stockpiles to minimise potential wind-entrainment. (f) Contouring and re-vegetation of the overburden and managed fill disposal area as soon as practicable. F8 Water supplies must be maintained at such capacity that application of water as a dust control measure is not limited.	
Bin Qiu	Noise & Vibration	Description of Missing Information 1. The blasting activity may not be included in the applicant's noise assessment report, as this activity does not appear in MDA report and its noise data of quarry equipment listed in Appendix B. Why is this Information Essential? Blasting can generate significant noise and vibration, which are likely to be the highest level of noise and vibration for the proposed quarry operations, without the assessment, it will be difficult to determine the compliance with the relevant standards and to evaluate its effects and the appropriateness of the proposed mitigation/management measures.	No	No		
Mica Plowman	Heritage / Archaeology	No	No	Yes		

Shanelle Beer Robinson	Regional Earthworks	Description of Missing Information 1. Significant Ecological Areas are mentioned in the reports and earthworks plans shown within close proximity to the SEA overlay on Geomaps. Per 11.8.2(1)(d), the earthworks plans should be updated to clearly specify the proximity/set-back from the SEA and management practices i.e. fencing/exclusions zones or otherwise apply for the necessary consents under E11.4.3(A28) and (A30) if earthworks greater than 5m2 and 5m3 are proposed in the SEA. 2. There is a lack of information regrading soil compaction methods and minimisation, specifically in relation to the haul roads, overburden bunds and stockpiles per E11.8.2(1)(c) and should be updated within the earthworks report. 3. The Erosion and Sediment Control Plans are missing some key detail to be considered in accordance with GD05. • All SRP, DEBs and Diversion Bunds/Channels must clearly have design details such as catchment area, volume, shape, storage, dimensions etc. • The plans do not clearly show the stabilised entrance/exit points for haul roads and the haul roads do not have erosion or sediment controls. • The plans do not illustrate the temporary vs permanent erosion and control features between stages. • Some plans have emergency spillways and outfalls shown for devices but there are no detailed designs showing cross-sections, materials, erosion protection etc. • Clear stipulation of maximum open area per stage should be added to the ESCP to demonstrate total exposed area per stage (ha) with colour-coded clear open vs stabilised areas. 4. There is a missing standalone Adaptive Management Plan for the earthworks. Adaptive Management is critical for large land disturbance proposals and where there are sensitive freshwater receiving environments. As part of an AMP, the following information would be required to understand how the works will be undertaken to ensure targeted responses can be achieved. The following is a high-level expectation as part of the AMP: • Hydrological baselines; including existing flow regimes and water quality with pre-works turbidity, TS, pH and ecological baselines (aquatic life, habitat, existing values of streams). • Receiving environment details: ecological value downstream and sensitivity to hydrological inputs, sediment yield susceptibility, set-back/buffering. • Monitoring Plan: identification of discharge points, frequency of sampling (manual / automatic at devices) and in-stream automated, parameters to be measured (TSS, turbidity, visual assessments, flow rates) • Trigger thresholds – agreed limits and rainfall data (rainfall gauge on site?) and trigger responses, responsibilities, corrective actions. Contingency actions for adverse weather, high turbidity readings or device failures. • Monitoring data and evaluation methods – comparisons between baseline data or trigger levels. Data reviews and reporting timelines.	Yes			

		• Long-term discussion regarding how the erosion and sediment control design will be adapted to climate change/variability (i.e. more frequent storm events and/or intense rainfall) over 50 years. • Approach to managing exceedances, device failures or high turbidity discharges. The AMP should include pre-determined trigger thresholds – i.e. NTU exceedances, how devices will be rectified and upgraded or additional devices installed. • How and when data is reported to Auckland Council or retention of monitoring/data recording. Please define when and how Council will be alerted. • Criteria for escalating responses – e.g. stop works, immediate stabilisation, re-design of controls etc. • Specific consent conditions relating to Adaptive Management Plan certification, monitoring and responses. 5. There is key missing information in relation to the streamworks. The earthworks report should be supported with a Streamworks Management Plan in accordance GD05. Currently there is: • No clear methodology for how streamworks will be undertaken in a way that avoids sediment discharges and minimises channel disturbance i.e. channel diversions, culvert removal, dam dewatering, stream realignment etc. Requires further information for working within a watercourse – i.e. coffer dams, pumps or sandbags, dewatering (screening), sediment control for stream bed/banks, timing and duration of works etc. • There are no details relating to native fish capture and relocation. • There is mention of offline constructed channels but no design detail such as lining, profiles, armouring at inlet/outlet. Why is this Information Essential? 1. To understand the potential impacts of the earthworks activity on the SEA environment Per 11.8.2(1)(d), – and whether additional reasons for consent are required under Chapter E11. 2. To understand how features of the ESC operation (haul roads, stockpiles) where soil compaction can occur and cause adverse effects such as reduced permeability and increased sediment-discharges per E11.8.2(1)(c). 3. GD05 is a benchmark standard in the AUP and failure for plans to be prepared in general accordance (beyond what can be conditioned as a finalised ESCP can result in a risk of device failure or poor performance. Poor device construction, monitoring and maintenance can lead to increased sediment discharges to waterbodies and sensitive receiving environments. 4. AMPs provide large earthworks projects and Council the opportunity to ensure that sediment generation is minimised and provides real-time monitoring and reporting tools. Given the 50-year term sought, the AMP as a live document will provide for a useful compliance tool but must have the correct thresholds and approaches prior to adoption. 5. Streamworks Methodology Plans are crucial when there are in-stream works required to demonstrate how works will be undertaken in a way that minimises sediment discharges, provide for fish salvage and monitoring as expected by GD05, E3 and the NESF.				

Simon Cocker	Landscape	TBC	Yes	No	TBC	
Vanessa Leddra	Policy	No	No	Yes	I have looked at the AEE and relevant information on this. Policy team do not have any requests for additional information, no site visit needed, no major issues envisaged at this stage.	