

Additional Section 92 Request for Information: BUN60440759 – 362 Jones Road, Drury				
Item	Information Request	Applicant's Response (as dated)	Council Response (as dated)	Applicant's Response (as dated)
1. Planning / General				
1(a)	Please provide an updated Assessment of Environmental Effects that reflects the final application to be presented at the hearing.		18-12-2025 <i>Item withdrawn – not a standard RFI requirement and the full information package can be reviewed to determine full consenting requirements.</i>	
1(b)	Please provide a list of and a copy of all documents and plans that reflect the final application to be presented at the hearing. <i>Note: This is to ensure that the application material can easily be understood and referenced by the Council, submitters, and the Hearing Panel.</i>		18-12-2025 <i>Item withdrawn – set of documents and plans held on Council file has been confirmed by the applicant to be the latest</i>	
1(c)	Provide an assessment of effects with regard to the following in terms of the Hays Creek Dam and water supply catchment: <ul style="list-style-type: none"> Sections 104(G) and 105 of the RMA; NES:DW (2007); NPS:FM (2020); NES:F (2020); Chapters B3, B7, D3, D7, E1 and E13 of the AUP(OP); Watercare's obligation to provide clean and safe potable water to the public, and An assessment of the proposed waste acceptance criteria for the managed fill activity against the maximum acceptable values contained in Tables 1-4 of the Water Services (Drinking Water Standards for New Zealand) Regulations 2022 	Refer attached. Hodgson Planning Consultants / Fraser Thomas Ltd. 8 December 2025	18-12-2025 Received	
1(d)	Council have identified that consent is required under Regulation 45B(1) & (2) of the NES: Freshwater for works during removal of the culvert and construction of the new bridge/haul road. Please update the AEE to reflect this, and specify the exact extent of earthworks and vegetation removal for these two areas.	07/10/2025 Boffa Miskell Limited 2025. 362 Jones Road: Ecological Report. Report prepared by Boffa Miskell Limited for Scarbro Civil Limited. Revision / version: 9 Issue date: 7 October 2025 20/10/2025 Fraser Thomas Ltd Landfills and cleanfill areas 45B Discretionary Activities (1) Vegetation clearance within, or within a 10 m setback from, a natural inland wetland is a discretionary activity if it is for the purpose of constructing or operating a landfill or a cleanfill area. (2) Earthworks or land disturbance within, or within a 10 m setback from, a natural inland wetland is a discretionary activity if it is for the purpose of constructing or operating a landfill or a cleanfill area. (6) A resource consent for a discretionary activity under this regulation must not be granted unless the consent authority has first— (a) satisfied itself that the landfill or cleanfill area— (i) will provide significant national or regional benefits; or	18-12-2025 Received	

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		<p>(ii) is required to support the quarrying activities regulated under regulation 45A; or (iii) is required to support urban development regulated under regulation 45C; or (iv) is required to support the extraction of minerals regulated under regulation 45D; and (b) satisfied itself that— (i) there is no practicable alternative location for the landfill or cleanfill area in the region; or (ii) every other practicable alternative location in the region would have equal or greater adverse effects on a natural inland wetland; and (c) applied the effects management hierarchy.</p> <p>Each of these criteria are assessed below:</p> <p>(6)(a)(i) The site is considered to be of significant regional benefit for the following reasons:</p> <ul style="list-style-type: none"> It is increasingly difficult to find suitable Fill sites within the Auckland region due to population growth and urban expansion, NPSHPL (productive soil issues), NPSFM/NESF and stream/wetland proximity issues and suitable road access. The ease of difficulty increases going from Class 5 (cleanfills) through to Class 1 (landfills) due to increasing engineering requirements and environmental protection considerations. The introduction of the national waste levy, which provides for differential charges between different Class Fill facilities and progressive annual increases in the levy has created a greater demand for cleanfill and managed facilities. It is taking increasingly longer times to consent such facilities – an estimated 1-3yrs for cleanfills and managed fills, based on FTL experience. The T&T "Clean and Managed Fill in Auckland" letter report for Auckland Council dated 16 March 2017 (attached), predicted the total demand for cleanfill/managed fill in the Auckland region in 2018 was 2,218,000 T/yr (with an accuracy of +15% and -65%). Projecting this out to 2025 on a pro rata population demand gives a 2025 demand of 2,232,500T/yr. Assuming a compacted waste density of 1.6-1.8T/m³ gives an annual Cleanfill/Managed Fill volume requirement of 1,240,300-1,395,300m³/yr. Hence, the Jones Rd Fill facility (790,000m³) will satisfy demand for 0.57-0.64 yrs based on T&T's best prediction extrapolated to 2025 (with a possible range of 0.49-1.82 years taking into account the stated ± percentage accuracies). Local factors supporting the Jones Rd Fill Facility include: <ul style="list-style-type: none"> It's proximity to areas of growth (green and brownfield) in South Auckland. It's proximity to the Winstone's quarry in Hunua, creating transport efficiencies for backloading empty trucks with hardfill materials, increasing vehicle utilisation efficiency and reducing transport related emissions. It will be a consented, monitored site, run by a reputable company that doesn't "cut corners" with comprehensive fill 		

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		<p>acceptance checks and surface water monitoring proposed with independent SQEP oversight.</p> <p>(6)(a)(ii) not applicable</p> <p>(6)(a)(iii) Most development projects involving earthworks generate excess clean/managed fill material requiring disposal, with the estimated demand in 2025 being 2,232,500 T/yr in 2025 from item (a)(i). This material has to go somewhere, and it is best it is disposed of locally, to minimise transport related environmental effects (vehicle emissions) and reduce congestion on road network. This is particularly true for the Jones Rd site, given its proximity to areas of growth.</p> <p>(6)(a)(iv) not applicable</p> <p>(6)(b)(i) The applicant has been actively searching for an appropriate fill site in Auckland for the past 8 years. Many sites have been viewed and ruled inappropriate given issues of proximity to fill sources, parcel size, access, wetlands, streams, Highly Productive Land. This site has proved to be the only suitable site the applicant has located. Being directly involved in the Auckland construction industry, they are acutely aware of the lack of consented fill sites available in suitable locations to take excavated fill from their development sites. This is resulting in increasing costs.</p> <p>This site was chosen through multilayer specialist assessments. Sites further away create added cost (transport, carbon). Issues of HPL have been avoided. Tangata Whenua concerns, issues of wetlands and effects on freshwater features have been avoided, and in fact there will be improvements on the current state in relation to the wetlands and streams. The assessment of alternatives must be practical to the applicant as it is not reasonable to assess every parcel across Auckland.</p> <p>(6)(b)(ii) This proposal increases the ecological value of the wetland – i.e. there is no equal or greater adverse effect. Furthermore, the vegetation clearance and earthworks activities do not relate to the Fill operation itself, but to construction of a much-improved accessway across an existing stream (that could potentially apply to many rural properties wanting improved access). There are only minor temporary potential effects to manage during the activities (with adequate controls provided to cover these) and significant long term, permanent ecological benefits for the stream/wetland.</p> <p>(6)(c) Refer Boffa Miskell Limited 2025. 362 Jones Road: Ecological Report. Report prepared by Boffa Miskell Limited for Scarbro Civil Limited. Revision / version: 9 Issue date: 7 October 2025</p>		

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1(e)	<p>Please provide calculated water demand for dust control and the proposed wheel wash, and confirm if this is possible via the permitted activity standards for groundwater take, or if there is a need for alternative sourcing.</p> <p>Note that Section 5.2.3 of the Good Practice Guide for Assessing and Managing Dust suggests that a rule of thumb water requirement is up to 1 litre per square metre per hour. The AEE states 10,000L per day, and it is anticipated that the exposed area at any time will be up to 2ha plus the potential dust management requirements for the haul road. This would suggest that the full extent of water requirement has not been provided for.</p> <p><i>Note: Limited reliance on use of sediment pond water for dust control can be made during the peak summer season when sediment ponds are relatively dry, and dust control becomes more critical.</i></p>	<p>20/10/2025 Fraser Thomas Ltd</p> <p>The Fill water demand covers three different activities:</p> <ul style="list-style-type: none">Staff usage from roofwater harvesting.Dust control/suppression from bore water, SRPs and tanker (severe drought only)Wheel washing from bore water and roofwater harvesting. <p>Dust Suppression:</p> <p>Consultation with some other cleanfill or managed fill operations has indicated that water is generally only applied to the gravel access roading and tip head areas for dust suppression purposes during summer months (taken as being equivalent to the earthworks season, October to April inclusive; or 7 months of the year).</p> <p>Hence, water demand requirements for dust suppression have been reassessed based on estimated roading and tip head areas for each sub-stage of the northern and southern fill areas as shown on FTL drawing 33250/195. Combined access roading and tip head areas have been calculated for each sub-stage, as shown in Table 1, based on there being only one tip head at any one time.</p> <p>GD05 (Erosion and Sediment Control Guide for Land Disturbing Activities in the Auckland Region) advises on pg 171 that the MfE's Good Practice Guide for Assessing and Managing Dust recommendation of 1 litre/m²/hour (or 1 mm/m² /hour) of water is generally considered conservative as the minimum amount of water that should be available on site is 5 mm/m²/day. This should be applied incrementally so the ground surface remains moist.</p> <p>Corresponding maximum daily water usage for dust suppression was calculated for each area, using the GD05 recommendation of 5L/m²/day, ignoring any incidental rainfall that occurs over the earthworks season. The table below displays these results and shows that the maximum daily water demand (on peak days with no rainfall) for dust suppression varies from 23-58m³/d, with the largest quantities being required during Stage N1, due to the significantly longer haul road involved to get to this Fill substage.</p> <p>Water Demand for Dust Suppression</p> <table><tr><th rowspan="2">Stage</th><th rowspan="2">Haul Road (m²)</th><th rowspan="2">Access Road + Tip Head (m²)</th><th rowspan="2">Total (m²)</th><th rowspan="2">Max. Daily Water Usage – Summer (m³/day)</th><th colspan="2">Estimated Annual Demand (m³/year)</th></tr><tr><th>Avg</th><th>20yr drought</th></tr><tr><td>N1</td><td>3,271</td><td>8,270</td><td>11,541</td><td>57.7</td><td>515</td><td>3,749</td></tr><tr><td>N2</td><td>3,271</td><td>4,839</td><td>8,110</td><td>40.6</td><td>362</td><td>2,635</td></tr><tr><td>N3</td><td>3,271</td><td>6,818</td><td>10,089</td><td>50.4</td><td>450</td><td>3,277</td></tr><tr><td>N4</td><td>3,271</td><td>3,603</td><td>6,874</td><td>34.4</td><td>307</td><td>2,233</td></tr><tr><td>N5</td><td>3,271</td><td>1,520</td><td>4,791</td><td>24.0</td><td>214</td><td>1,556</td></tr><tr><td>S</td><td>3,271</td><td>1,263</td><td>4,534</td><td>22.7</td><td>202</td><td>1,473</td></tr></table>			Stage	Haul Road (m²)	Access Road + Tip Head (m²)	Total (m²)	Max. Daily Water Usage – Summer (m³/day)	Estimated Annual Demand (m³/year)		Avg	20yr drought	N1	3,271	8,270	11,541	57.7	515	3,749	N2	3,271	4,839	8,110	40.6	362	2,635	N3	3,271	6,818	10,089	50.4	450	3,277	N4	3,271	3,603	6,874	34.4	307	2,233	N5	3,271	1,520	4,791	24.0	214	1,556	S	3,271	1,263	4,534	22.7	202	1,473	18-12-2025 Received	
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		<p>Associated combined staff, wheel wash and dust suppression water demand is summarised below.</p> <p>Estimated Daily and Annual Water Usage</p> <table> <tr> <th>Use</th><th>Description</th><th>Source</th><th>Max Daily Usage (m³/d)</th><th>Annual Usage (m³)</th></tr> <tr> <td>Staff</td><td>3-4 staff x 50L/person.d</td><td>Roof water</td><td>0.15-0.20</td><td>40-53</td></tr> <tr> <td>Wheel wash facility</td><td>Proprietary wheel wash with water recycling</td><td>Roof water + new bore</td><td>2.4</td><td>198</td></tr> <tr> <td>Dust suppression</td><td>Water for dust suppression purposes using water truck or similar</td><td>New bore, SRPs and tanker</td><td>Max 22.7-57.7</td><td>202-515 (avg) 1,473-3,749 (20yr drought)</td></tr> <tr> <td>Total</td><td></td><td></td><td>Max 25.25-60.3</td><td>440-766 (avg) 1,711-4,000 (20yr drought)</td></tr> </table> <p>Notes:</p> <ul style="list-style-type: none"> Staff use based on 269 working days per yr (5.5d/wk less 20d holidays) Wheel wash water usage based on 25L/vehicle average water loss, maximum of 96 vehicles/day and average of 7900 vehicles/year. Dust control water usage based on analysis referred to above, with further details in engineering report.. <p>Water supply will be provided to the site office by roof rainwater harvesting, as per the existing situation. No bore water should be required for site office use.</p> <p>Water supply for the vehicle washing facility will be provided by roof water harvesting off nearby buildings, with storage in 4 x 30m³ tanks, with topup provision from the new bore. These tanks will provide storage for up to 50 days maximum water demand, or 178 days average demand (based on 27 vehicles on average per day and 96 max per day). Hence, it is expected that most of the wheel wash supply will be provided from roof water harvesting, with bore topup being required infrequently and likely limited to drought</p>	Use	Description	Source	Max Daily Usage (m ³ /d)	Annual Usage (m ³)	Staff	3-4 staff x 50L/person.d	Roof water	0.15-0.20	40-53	Wheel wash facility	Proprietary wheel wash with water recycling	Roof water + new bore	2.4	198	Dust suppression	Water for dust suppression purposes using water truck or similar	New bore, SRPs and tanker	Max 22.7-57.7	202-515 (avg) 1,473-3,749 (20yr drought)	Total			Max 25.25-60.3	440-766 (avg) 1,711-4,000 (20yr drought)		
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		<p>years. Imported tanker water would be utilised in an extreme drought, if the permitted activity daily bore take limit is exceeded.</p> <p>Water supply for dust control would be provided by a combination of roof water harvesting, bore water use, pumping water from the SRPs into additional 30m³ storage tanks located by the SRPs; and imported tanker water, in an extreme drought, to avoid exceeding the permitted activity limit.</p> <p>Section E7 of the AUP:OP Activity A15 provides for up to 20m³/day to be taken from a groundwater bore, when averaged over any consecutive five day period and no more than 5,000m³/year as a permitted activity. The proposed groundwater take volumes will be controlled to be within the permitted activity limits.</p> <p>Based on the rainfall analysis undertaken, this area receives reasonable rainfall and it is expected that the above provisions will reliably provide for the required water demand, without exceeding the permitted activity groundwater take requirements.</p> <p>If tanker water is required during an extreme dry period, then the tanker truck movements would be within the consented truck movements and not additional.</p>		
1(f)	<p>Please assess the feasibility of the wheel wash operating during peak hours and peak truck movements. Include details of staffing requirements, time taken per truck, and whether there could be queuing of trucks or potential for trucks to skip the wheel wash process in order to meet deadlines.</p> <p>It is noted that the AEE specifies 5 minutes per vehicle for washing, and that in a peak hour there will be up to 20 trucks.</p>	<p>8/12/25</p> <p>This question is no longer relevant as proprietary wheel wash now proposed which can readily handle peak traffic load of 20 trucks per hour.</p>	18-12-2025 Received	
1(g)	<p>Please confirm if there is any scope for the riparian planting to be undertaken in Stage 1, to provide an additional buffer for streams/wetlands and to provide earlier environmental enhancement.</p>	<p>07/10/2025</p> <p>Planting can be brought forward to achieve earlier environmental enhancement and assist with water quality and landscape outcomes. The timing would need to be seasonally related to ensure success.</p> <p>Refer</p> <p>Boffa Miskell Limited 2025. 362 Jones Road: Ecological Report. Report prepared by Boffa Miskell Limited for Scarbro Civil Limited. Revision / version: 9 Issue date: 7 October 2025</p> <p>LA4 Technical Memo: 25 September 2025</p>	18-12-2025 Received	
1(h)	<p>Some submissions have suggested increased buffer planting around the site exterior for amenity and landscape purposes, and others make reference to the proposal not being screened during the 10 year duration of works. Please advise if there is any scope for additional perimeter screen planting to be included in the application.</p>	<p>07/10/2025</p> <p>Increased buffer planting around the site exterior for amenity and landscape purposes.</p> <p>Refer</p>	18-12-2025 Received	

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1(i)	Please provide an assessment of the proposal against the permitted activity rule and standards in E14 (Air Quality) of the AUP(OP).	<p>20/10/2025 Fraser Thomas Ltd</p> <p>The WasteMINZ Technical Guidelines for Disposal to Land (Revision 3.1, September 2023) advise that for Class 3-5 Fills, the only airborne contaminant risk is dust.</p> <p>AUP(OP) E14 (Air Quality) refers to specific activities relating to landfills (A158-160) but none for clean fills or managed fills.</p> <p>Review of E14 indicates that the proposed Fill activity may trigger: A1: Activities meeting the permitted activity standards and not provided for by any other rule (permitted activity); and A83: Earthworks and the construction, maintenance and repair of public roads and railways not meeting the general permitted activity standards.</p> <p>The permitted activity standards comprise:</p> <ol style="list-style-type: none"> (1) The discharge must not cause, or be likely to cause, adverse effects on human health, property or ecosystems beyond the boundary of the premises where the activity takes place. (2) The discharge must not cause noxious, dangerous, offensive or objectionable odour, dust, particulate, smoke or ash beyond the boundary of the premises where the activity takes place. (3) There must be no dangerous, offensive or objectionable visible emissions. (4) There must be no spray drift or overspray beyond the boundary of the premises where the activity takes place. <p>Assessing against these standards:</p> <ol style="list-style-type: none"> (1) The airborne contaminant risk to consider here is dust. Dust will be controlled as set out in the Fill Management Plan, adopting appropriate measures from an extensive toolbox: <ul style="list-style-type: none"> • Use of water as necessary, primarily to dampen haul roads and tipping head areas and any other exposed surfaces identified by the operator, using water sourced from the sediment ponds, or from a dedicated storage tank supplied by the proposed on-site bore, if insufficient water is available from the ponds. • Maintaining vehicle accessways with sufficient seal or aggregate material. • Restricting the speed of vehicle movements to no more than 20kph. • Daily monitoring for wind conditions and dust discharges around the site. • Minimising the extent of the exposed area at any one time. 	18-12-2025 Received	

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		<ul style="list-style-type: none"> Limiting traffic to established haul roads and minimising travel distances by optimising site layout. Minimising tracking of dirt on vehicle wheels onto paved surfaces. Minimising drop heights when loading and unloading vehicles. Limiting stockpile heights. Providing shelter from the wind for stockpiles. Consolidating and sealing off loose surface material. Progressive mulching and grass establishment, as works are completed in different areas. Use of soil binders to form a cohesive membrane or protective crust that reduces windblown dust generation (refer GD05, Section G8.0 for further details) (contingency measure). Use of textiles as temporary covers on stockpiles or partially completed batter slopes, or as permanent cover (e.g. vegetation promotion blanket) on completed areas (contingency measure). <p>Collectively these measures will ensure the dust from the Fill operation is adequately controlled and suppressed so as to be unlikely to cause adverse effects on human health, property or ecosystems beyond the Fill site boundary, thus satisfying this criteria.</p> <p>(2) As for item (1), the airborne contaminant risk to consider here is dust. Again, effective implementation of the FMP and the dust control measures provided for in a toolbox format, will ensure that dust from the site will not be noxious, dangerous, offensive or objectionable beyond the site boundary. The other items listed (odour, particulate, smoke or ash) do not apply to the proposed Fill activity.</p> <p>(3) This is not relevant as there will be no dangerous offensive or objectionable visible emissions.</p> <p>(4) This is not relevant as no spraying is proposed as part of the Fill operation.</p>		
1(j)	Confirm whether the use of a rainfall activated chemical treatment system for the Sediment Retention Ponds will have any impact on downstream water quality (i.e. what is the effect of the chemicals used on drinking water and human health).	<p>20/10/2025 Fraser Thomas Ltd</p> <p>The Engineering report (section 5.2.5) refers to flocculation bench testing being undertaken of the natural soils on-site to determine if chemical flocculation is needed during the early stages of filling and the required dosing rate. Bench testing will be undertaken for PAC (polyaluminium chloride), while it refers to the potential use of an organic flocculant will also be considered, subject to performance and cost considerations.</p> <p>Based on FTL's experience of earthworks at multiple sites across the Auckland region, we would expect some flocculant dosing will be required to enhance sediment removal and that PAC will be the most likely flocculant used, as the majority of research and experience in the Auckland region relates to the use of this flocculant. The reference to organic flocculants above was made primarily based on experience from other consent applications for</p>	18-12-2025 Received	

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		<p>earthworks projects that some stakeholders (e.g. mana whenua) encourage the use of alternative flocculants. This is specifically referred to in Section F2.1.7 of GD05. The possible use of organic floc is no longer proposed in response to Watercare's submission.</p> <p>The FMP allows for following GD05 recommended practices to minimise potential negative human health and environmental effects. This includes ensuring that the pH should not be changed by more than ± 1 and should not fall outside the range of 5.5-8.5.</p> <p>Soluble aluminium will also be tested for to check for residual aluminium levels in discharges from the sediment retention ponds if PAC is used as a flocculant. A trigger level for aluminium would be set based on ANZECC guidelines for the protection of 80% of freshwater aquatic species. This is considered an appropriate threshold for checking impacts on downstream water quality. If the pH or soluble aluminium trigger levels are exceeded, appropriate contingency measures will be implemented as set out in the updated FMP, including stopping site discharges until contaminant concentrations reduce to within trigger levels. These practices should ensure that the effect of these chemicals used in chemical treatment of site stormwater discharges will be less than minor.</p> <p>It is further noted that PAC is commonly used as a coagulant in water purification and hence is likely used at the Papakura Water Treatment Plant which treats water from the Hays Dam.</p>		
1(k)	Please provide an assessment of the potential impact of the proposal in terms of groundwater recharge (due to increased compaction and drainage reducing potential groundwater infiltration), and whether this will have any impact on receiving freshwater ecological features.	<p>20/10/2025 Fraser Thomas Ltd</p> <p>There are two main groundwater aquifer systems in the area – shallow and deep.</p> <p>The shallow aquifer generally represents perched groundwater and discharges to local streams. The risk of contamination of the shallow aquifer is considered to be low, while stream quality monitoring is proposed to check this, with contingency measures put in place to address any issue that may arise.</p> <p>Limited information on groundwater bores in the area indicates that the groundwater in the deeper aquifer is at about RL160m (equivalent to depths of 30m to 60m) from PDP (2025)¹.</p> <p>Review of the geotech logs included in the FTL geotechnical report submitted with the consent application shows that the topsoil depth across the site varies from 0.10-0.35m with an average of 0.19m.</p> <p>The Applicant is proposing to respread a minimum of 200mm of topsoil on completed fill areas.</p> <p>The geotechnical report refers to the Waipapa Group residual soils that underly the proposed Fill areas as comprising silty clays, clays and clayey silts with variable sand and gravel content. In-situ undrained shear strength values measured in the residual soils ranged between approximately 55kPa and greater than 200kPa, corresponding to a stiff to hard consistency. In general, the</p>	18-12-2025 Received	

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		<p>measured shear strengths were greater than 100 kPa, corresponding to a very stiff consistency.</p> <p>The proposed Fill involves stripping the existing topsoil and placing additional fill material on top of this and then replacing stripped topsoil to return the site to agricultural land use. The proposed fill specification has adopted a lower compaction standard than for residential subdivision, namely an average undrained shear strength of not less than 80 kPa and any one-test site value of not less than 50 kPa, and average air voids of not more than 12% and no one value over 14%.</p> <p>FTL geotechnical engineering advice is that the underlying natural soils are already sufficiently “hard”, that they are unlikely to undergo any significant consolidation settlement, due to the surcharge load from the overlying additional fill materials¹.</p> <p>In this situation, it is expected that groundwater recharge will remain similar to the existing situation – i.e. rainfall that soaks into the site soils, will be stored within the soil matrix up to the available water capacity, with excess rainfall then flowing laterally to the nearby local streams, contributing baseflow. Typically, the lateral flow occurs as “interflow” between a more permeable upper layer and less permeable lower layer (e.g. topsoil and subsoils). This mechanism is expected to continue in a similar manner to the existing situation, as the proposed topsoil depth is similar to existing, and the subsoils will be more compacted than the topsoil.</p> <p>During filling in any sub-stage, a maximum of 2ha will be in operation at any one time. Surface runoff from these areas will go to sediment retention ponds, while infiltrating water is expected to behave in a similar manner to the existing situation and percolate through the fill material and discharge to the local streams either directly or via some being captured by the groundwater subsoil drainage system.</p> <p>It is important to note that the purpose of the proposed subsoil drains under the fill is to reduce pore water pressures in soils under the fill to assist with managing fill stability rather than to capture all groundwater. Any groundwater collected by these drains will be conveyed to the SRPs and then discharged to nearby streams.</p> <p>The proposed northern fill extent is 9ha while the Hays Creek dam catchment (based on areas draining to the dam only) is approximately 670ha (from T&T (2024) – see item 2(b) and independently checked in Geomaps). Potential recharge effects relate to ~1.3% of the catchment area and are therefore limited.</p> <p>Hence, overall, it is expected that the potential impact of the proposal in terms of groundwater recharge will not have adverse effects on receiving freshwater ecological features. Furthermore, techniques are available to retain and promote groundwater recharge if necessary (e.g. subsoil ripping).</p>		

¹ This is based on more in depth review of the geotechnical investigation findings and supersedes a statement in section 6.9 of the engineering report which refers to filling in the northern fill loading and compressing the ground under it.

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		¹ PDP (2025). Proposed Sutton Block Expansion Groundwater and Surface Water Effects Assessment. Prepared for Stevensons Aggregates. March 2025.		
2. Managed Fill and Land Contamination				
2(a)	<p>The applicant is proposing to import fill material that contains concentrations of zinc and nickel exceeding the background soil non-volcanic range (noting the site is located in a non-volcanic geological area) and the AUP(OP) permitted activity soil criteria.</p> <p>The fill acceptance criteria propose importing fill material containing zinc and nickel concentrations up to the background soil volcanic range, thus allowing high concentrations of zinc and nickel within fill material onto the site.</p> <p>Please discuss the justification of why it is believed the effect on the environment will be less than minor, particularly with regards to surface water and sediment quality on and offsite.</p>	<p>20/10/2025 Fraser Thomas Ltd</p> <p>Please refer response to item 1(c) which largely covers this query and explains why it is considered that potential effects on surface water are less than minor. Furthermore, as explained below, it is expected that 95% of silt/sediment will be removed from stormwater runoff from operational areas prior to offsite discharge, further reducing the potential for effects on surface water.</p> <p>Additional comments are added below in relation to sediment quality.</p> <p>Rainfall on operational areas will have a relatively short contact time with the deposited fill material and will primarily pick up silt and sediment material, potentially including some contaminants in particulate form (e.g. heavy metals), subject to their leachability which is expected to be low. All runoff from operational areas will be collected and conveyed to sediment retention ponds (SRPs), where chemical flocculants will be added, at an appropriate dosing rate based on bench testing, to promote the removal of suspended solids and other contaminants. The Universal Soil Loss Equation referred to in GD05 advises applying a 95% sediment removal efficiency when chemical flocculation is used. Furthermore, sediment pond discharges will be checked regularly for pH and clarity, with contingency measures implemented if the pH varies by more than ±1 pH unit or the clarity is less than 100mm. Hence, it is expected that almost all suspended solids, including associated contaminants, will be removed from the stormwater runoff prior to discharge off-site. The removed silt/sediment is deposited in the SRPs and will be periodically removed from them, thus eliminating the potential for this silt/sediment to be discharged to the receiving environment.</p> <p>Some deposition of residual silt/sediment may occur as water travels downstream but this is expected to be less than minor.</p> <p>It is noted that the site within which the Fill is located has been used for rural purposes for at least the last 80 years as a dry stock farm. In recent years, there have been a maximum of 30 cattle on the farm at any one time. Cattle grazing will contribute silt/sediment, nutrients and pathogens to stormwater discharges. During fill operations, no animal grazing is proposed. Hence, this source of contaminants will be eliminated during the Fill operation, avoiding potential negative impacts from animal grazing on surface water quality, representing an improvement to the existing situation.</p>	18-12-2025 Received	

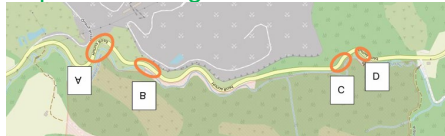
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2(b)	Please discuss the potential surface water and sediment quality effects on neighbouring properties and on the Hays Creek catchment from the importation of Managed Fill material into the site.	<p>20/10/2025 Fraser Thomas Ltd</p> <p>Please refer response to item 1(c) and 2(a) which largely covers this query and explains why it is considered that potential effects on surface water and sediment are less than minor. This applies to stormwater discharges from the site. The effects on neighbouring properties and the Hays Creek catchment are expected to be less.</p> <p>The northern Fill area is split across two catchments. The eastern section makes up 3.0ha of a total catchment area at the site boundary of ~12.3ha. The western section makes up 6.0ha of a total catchment area at the site boundary of ~16.4ha. These two flowpaths combine further downstream approximately 510-560m below the site, where the combined catchment is 259ha. At this point, the Fill area represents 3.5% of the combined catchment.</p> <p>The southern Fill area makes up 2ha of the total catchment area at the site boundary of 19.4ha, while site runoff combines with other overland flowpaths (OLFPs) from the subject site and surrounds to form a much larger OLFP (78.4ha) area within 170m of the site boundary. At this point, the Fill area represents 2.6% of the combined catchment.</p> <p>Hence, in both cases, the Fill areas make up relatively small proportions of the total contributing stormwater catchments within a relatively short distance of the site discharge point.</p> <p>The Tonkin & Taylor Hunua Ranges Water Supply Catchment Risk Assessment (June 2024) attached advises that the total Hays Creek catchment area is 670ha, of which 72% is privately owned. 51% of the catchment is classified as exotic grassland, 25% as exotic forest and 9% as native forest (Landcare Research Land Cover database Version 5). Farming, horticulture and plantation forestry form part of the land use in this catchment, while all residential properties are expected to have their own on-site wastewater treatment and disposal systems.</p> <p>The Northern Fill site is located at the southern end of the Hays Creek catchment and makes up 1.3% of this catchment area, while the shortest flowpath from the Fill area to the Hays Creek dam lake is approximately 1.3km. The Southern Fill site discharges stormwater via a different route, which bypasses the Hays Creek dam. Hence, the effects of stormwater discharges from the Managed Fill on the Hays Creek catchment are considered likely to be less than minor, given the nature of the fill material, the proposed GD05 compliance erosion and sediment control practices, including SRPs with chemical treatment, the small proportion the Northern Fill makes up of the Hays Creek catchment and the reasonable distance from the site to the Hays Creek dam lake.</p>	18-12-2025 Received	
2(c)	Please undertake surface water quality sampling on streams/waterways upgradient (if possible) and downgradient of the proposed Managed Fill area including off-site locations (if possible), to characterise the quality of surface water prior to the importation of Managed Fill material. Please provide to	<p>20/10/2025 Fraser Thomas Ltd</p> <p>The proposed surface water investigation is set out in the following for characterisation of the baseline water quality.</p>	18-12-2025 Received	

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	Council the surface water quality investigation and findings and include a map with surveyed surface water monitoring locations.	<p>The Northern Fill area will discharge stormwater via two separate SRPs to different streams. Both streams receive runoff from upgradient off-site sources. The north-western stream (Stream 3) is to be sampled upgradient of the Fill area at the site boundary where runoff enters the site from a culvert under Jones Rd (S3 US) and at the downstream site boundary below the Fill area (S3 DS). The north-eastern stream (Stream 4) is to be sampled on the site boundary where two upstream tributaries enter the site S4 US Sth (3.4ha catchment) and S4 US Nth (4.8ha catchment).</p> <p>For the Southern Fill area, upstream sampling will be undertaken on Stream 1 slightly inside the site where two flowpaths converge (S1 US) and at downstream locations on the site boundary at S1 DS and S2 DS, the latter to capture the discharge from the wetland area (Stream 2). There is no appropriate upgradient sampling location to sample above the wetland.</p> <p>The proposed sampling locations are shown on the attached plan, 33250/502.</p> <p>Three rounds of sampling have been undertaken, including one storm event (>20mm in 24h) and will be reported on in the near future, following receipt of the third round of results from the lab. Field measurements would be undertaken of pH, temperature, dissolved oxygen, electrical conductivity and turbidity. Visual observations would also be recorded relating to water colour, clarity, odour and any separate phase hydrocarbons observed. Lab testing would be undertaken for pH, conductivity, total suspended solids, dissolved heavy metals (arsenic, cadmium, chromium, copper, lead, nickel and zinc) and Total petroleum hydrocarbons (TPHs).</p> <p>These results will be assessed against relevant guidelines, based on the ANZECC Guidelines for protection of 80% of freshwater species. The results of this investigation will be reported back to Council once this sampling is completed.</p>		
2(d)	If granted, Council will recommend that surface water monitoring is undertaken for the duration of the consent. Please update the Fill Management Plan with the proposed surface water monitoring to be undertaken during the life of the consent, and please include a site plan showing the surface water sampling locations downstream and offsite of the Managed Fill area. The proposed monitoring should include analytical suite, frequency of monitoring, trigger levels, and contingency measures if trigger levels are exceeded.	<p>20/10/2025 Fraser Thomas Ltd</p> <p>The Fill Management Plan (FMP) has been updated to include proposed surface water monitoring, including a plan showing surface water sampling locations. The FMP now includes the proposed analytical suite, frequency of monitoring, trigger levels, and contingency measures if trigger levels are exceeded.</p>	18-12-2025 Received	
2(e)	Please update section 5.2.6 Pond Sediment Sampling of the Fill Management Plan to include the requirement for sediment sampling of sediment downstream of the sediment pond, if the pond sediment sampling has confirmed any exceedances of the proposed trigger values (Interim Sediment Quality Guidelines (ISQG – low trigger value) in Table 3.5.1 (Recommended sediment quality guidelines) of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC 2000). Please include the proposed sediment sampling locations on a site map, details on the additional sediment sampling to be undertaken as a	<p>20/10/2025 Fraser Thomas Ltd</p> <p>It is not expected that sediment in any SRPs will contain elevated contaminant levels exceeding the proposed trigger levels, if the procedures set out in the FMP are followed and the SRPs are operated correctly. If however, sediment sampling does find a trigger level exceedance, this is reflective of sediment that has been removed from pond water as a result of natural and chemically enhanced settlement (flocculation). It is highly unlikely</p>	18-12-2025 Received	

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	contingency measure, and proposed remediation requirements if contaminated sediment is migrating offsite.	that this sediment can migrate from the SRPs as these ponds are designed and operated to prevent this. Only stormwater will be discharged from the pond containing low levels of residual solids (95% removal expected based on flocculation), likely present mainly in dissolved form rather than particulate (suspended) form. The SRP discharge water is expected to produce relatively little additional sediment and it is expected that this sediment would have very low contaminant concentrations. Hence, it is considered that the proposed discharge point stormwater sampling adequately addresses this risk and that downstream sediment sampling is not necessary. This is consistent with consent conditions for at least three other managed fill operations we are familiar with.		
2(f)	The applicant is proposing to discharge any groundwater collected within the underfill drains to the existing gullies on the site, please provide a map showing the locations of the underfill drain discharge points. The Council recommends the underfill drain discharge points are monitored for the duration of the filling on the site to determine if groundwater discharges in particular concentrations of zinc are affecting surface water quality on and offsite. Please update the Fill Management Plan with the proposed monitoring plan for underfill drain discharge point monitoring, this should include the frequency of monitoring including increased monitoring following high rainfall events, the analytical suite, trigger levels, contingency measures if trigger levels are exceeded, and the proposed remediation measures.	<p>20/10/2025 Fraser Thomas Ltd</p> <p>The primary purpose of the groundwater underfill drains is to reduce pore water pressures in soils under the fill to assist with managing fill stability rather than to capture all groundwater – i.e. they are intended to manage seasonal increases in groundwater levels into the fill from natural ground below the fill. Any such groundwater is expected to have minimum contact with the overlying fill material and hence to be “clean”. However, some groundwater percolating downwards through the fill material will also be picked up by the underfill drains. This was reflected in the original design, which allowed for the underdrains to discharge to the perimeter drainage system for conveyance to the SRPs.</p> <p>This was revised as part of the earlier round of S92 requests, in response to item 2(c) of that RFI, with all underdrains discharging directly to existing gullies, rather than to the perimeter drains and/or sediment removal ponds, as there was considered no need to treat the groundwater underdrainage. Refer respective versions of FTL drawings 33250/350 and 33250/351 from the original application and following the S92 response, which show the underfill drainage discharge locations.</p> <p>To respond to this new query, it is now proposed to revert back to the original design, with the underfill drains being discharged to the perimeter drainage system and conveyed to the respective SRPs. Hence, all underfill drainage will be treated in the SRPs.</p> <p>The revised FMP sets out the proposed surface sampling regime. This focuses on sampling from the SRP discharges and at the site discharge points. Underfill drain sampling is not proposed as part of routine sampling, for reasons explained further below and also as practically, these drains typically contain no or very low flows and hence represent a negligible proportion of the SRP inflows.</p> <p>If there are any SRP and/or site discharge trigger level exceedances, the sampling methodology allows for tracing potential sources, including checking the underfill drains at that time. This is considered a more practical and appropriate sampling regime.</p>	18-12-2025 Received	
2(g)	Please update the Fill Management Plan with the following:	20/10/2025 Fraser Thomas Ltd	18-12-2025 Received	

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	<p>i. The Waste Acceptance Criteria updated with the Acceptance limits for organic contaminants from WasteMINZ Land Disposal Guidelines for Class 5 Landfills (Cleanfills) September 2023, Rev 3.1 – Appendix H-2</p> <p>ii. During importation of Managed Fill onto the site, verification sampling must be carried out on the active tip face and compacted fill, on a six-monthly basis, in accordance with the WasteMINZ Technical Guidelines for Disposal to Land – Revision 3 (September 2023). The number of samples collected must be representative of the volume of fill imported onto the site and enable statistical analysis to be performed to confirm the concentrations of contaminants imported onto the site.</p>	<p>The Fill Management Plan has been updated to address item (i). This required changing the TPH criteria from 120mg/kg to 110mg/kg (typo error) and updating the WasteMINZ report reference under the table from Version 3 to 3.1.</p> <p>The verification sampling section has also been updated to make it clearer in response to item (ii). It is important in this context to recognise that fill acceptance and placement involves a multi-layered risk management approach including:</p> <ul style="list-style-type: none"> • Pre-waste acceptance checks • Right of access is strictly controlled and limited to SEL and authorised sub-contractors • Random soil sampling at the site entrance at a frequency of one sample per 500m³. • Additional visual checks at the tip face. • Verification sampling of placed fill. • SRP and stormwater discharge sampling, checking effective silt/sediment removal and potential contaminant leaching from the fill material. <p>Hence, the verification sampling is the final step, undertaken by an independent SQEP, that the waste acceptance process is working effectively, while the SRP/stormwater discharge sampling provides a further line of evidence to support this.</p> <p>For these reasons, the proposed verification sampling frequency set out in the FMP is based on one sample per 4,500m³. This sampling frequency has been accepted by Council on at least one other managed fill site we are aware of. This density reflects this being the final step and the multiple other risk management controls in place.</p>		
3. Noise (Note: includes both technical specialist and planning queries)				
3(a)	Please provide additional information on rural amenity effects when considering the level, character, timing, frequency, and duration of noise emissions from daily filling activities, the relationship with the existing noise environment (i.e. ambient and background noise levels) and, the audibility of noise received at the closest neighbouring dwellings including in outdoor living areas and inside habitable rooms.	<p>10/10/2025</p> <p>Refer</p> <p>Styles Group, Response to Section 92 Questions: 10 October 2025</p>	<p>18-12-2025</p> <p>Received</p>	
3(b)	Please comment if vibration from heavy machinery operating on the subject site will be perceptible at the closest dwellings and if so, please describe typical subjective effects on affected occupants and any mitigation (if required).	<p>10/10/2025</p> <p>Refer</p> <p>Styles Group, Response to Section 92 Questions: 10 October 2025</p>	<p>18-12-2025</p> <p>Received</p>	
3(c)	Although trucks driving on public roads to and from the subject site are outside the scope of the AUP(OP) noise standards, given a number of submitters have expressed their concerns, please confirm the preferred route (i.e. immediate road network) for trucks travelling to and from the subject site and, the associated noise and vibration effects on the closest dwellings to the road having regard to existing traffic volume, the percentage of heavy vehicles, the frequency and timing of truck pass-by events	<p>10/10/2025</p> <p>Refer</p> <p>Styles Group, Response to Section 92 Questions: 10 October 2025</p>	<p>18-12-2025</p> <p>Received</p>	

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	associated with the subject site and, potential noise or vibration nuisance from truck pass-by events relative to the existing noise environment.			
3(d)	Please confirm the level of mitigation (in decibels) provided by the proposed noise bund, as the acoustic assessment states the bund will be located approximately 20-25m from the eastern boundary but the plans show the bund will be much closer.	10/10/2025 Refer Styles Group, Response to Section 92 Questions: 10 October 2025	18-12-2025 Received	
3(e)	Please update the noise assessment to consider potential effects on the newest dwelling located at 1821 Hunua Road (which was not shown on the previous aerial images).	10/10/2025 Refer Styles Group, Response to Section 92 Questions: 10 October 2025	18-12-2025 Received	
3(f)	<u>Non-s92 suggestion/comments:</u> If you have considered any amendments to the proposal as a result of your review of the submissions, or have any further information prepared in this regard, please advise so that this can be reviewed.	10/10/2025 Refer Styles Group, Response to Section 92 Questions: 10 October 2025	18-12-2025 Received	
4. Auckland Transport				
4(a)	The Applicant states that a majority of trips are anticipated to approach from Hunua Road. However, it fails to quantify the proportion of trips that will not follow this route. Please provide the following: i. A clear list of every other road or access point that will be used by trucks to reach the site, besides Hunua Road; ii. For every identified access route including Hunua Road, a specific, quantified number or percentage of truck trips expected to use that route; iii. Brief explanation of why certain routes are chosen for specific volumes, and iv. Any key assumption underlying the truck volume calculations.	13/10/2025 Response from Commute. ALL trucks will be from Hunua Road from the west. Specifically: i. There are no other road / access points. ii. 100% use Hunua Road to the west of the site. iii. Hunua Road to the west is the closest route to motorway / Heavy Vehicle route. iv. The truck volume calculations are provided within the traffic report (Section 4.1). Response from planning. The applicant would support a condition prohibiting access from other directions/via other routes, unless AT has put road diversions in place requiring this.	i. No access should be allowed from any other road. A condition should be provided to ensure Hunua Rd is the only road to be used (if the consent is approved). In our view the site visit has confirmed that other roads such as Ponga Road and Jones Road are unsuitable and not safe for truck and trailers to use. ii. Noted iii. Noted iv. During the off-peak season, what are the estimated daily truck trips being made? The applicant has stated that 192 truck trips will occur daily for 6-7 months of the year being 182 days (exclusive of Sundays). If 192 trips per day is occurring for more than 2/3 of year than how can the average be so low. The average of 52 trips per day cannot be correct if 192 trips are occurring for 7 months of the year. The high number of trips over such a long period pushes the overall	24/11/2025 Refer Commute, Technical Memo 24 November 2025 i. We agree. To be completely clear, NO road other than Hunua Road will be used for access and ALL trucks will enter the site from the west ie left in / right out. ii. . iii. . iv. . • The average trucks over the 10 year period is approximately 27 trucks per day or 2-3 trucks per hour. • This further equates to 54 truck movements per day (in and out) or an average of 4-6 truck movements per hour) • This is calculated using the assumptions as detailed in Section 4.1 of the Traffic Report • The “peak” movements will indeed be 192 truck trips / movement per day As per the traffic Report this is to allow the applicant some flexibility to accommodate for seasonal fluctuations and thereby allow for up to 96 truckloads a day. This threshold

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			<p>average well above 52. If 192 truck trips occur daily for 182 days, and there are 0 trips on the remaining 131 days, then the average number of trips per day over the year would be approximately 112.04 trips per day. This is more than double the claimed annual average of 52 trips per day.</p> <p>Please provide the full breakdown of the trip generation calculations. If we are to consider the annual average of trips for the PIA then we need to understand this more.</p>	<p>would equate to 20 trucks an hour (40 truck movements an hour).</p> <ul style="list-style-type: none"> This flexibility will NOT occur for the full 6-7 months per year (typical earthworks season) just short periods within the 6-7 months as demand requires.
4(b)	The Applicant's original assessment mainly looked at the chances of head on collisions between two Scarbro trucks and stating that two Scarbro trucks could not pass each other at certain points. Can the Applicant demonstrate that emergency service vehicles and regular vehicles can pass Scarbro trucks at the pinch points on Hunua Road. This should be demonstrated on tracking plans.	<p>13/10/2025</p> <p>Response from Commute.</p> <p>Further tracking assessment of Scarbro truck / trailer vs a van / Fire truck (8m) is attached (Appendix A). Of note only the key areas in the gorge have been assessed (areas where two Scarbro truck and trailer cannot pass as identified in the traffic report). This has shown two of the three areas identified (smaller extent) cannot accommodate a truck and trailer (including Scarbro truck) vs an ambulance / fire truck. Of note this is a rare event.</p> <p>The same issues occur between Scarbro trucks and emergency vehicles (eg fire trucks or ambulances) as occurs currently with other trucks and emergency vehicles. The mitigation proposed in the traffic report (signage and vegetation trimming) will aid not only Scarbro trucks but existing trucks in these areas passing emergency vehicles and these are considered to be already required (regardless of the proposal).</p>	<p>AT would like to understand the extent to which the pinch points on Hunua could be widened slightly. Because these are the most critical points, we need to understand if widening is physically possible, and would like some further evidence to support as to why it couldn't be done, irrespective of cost. Suggest this could be slight shoulder widening around the bends where required. If this possible, paired with sightlines improvements, could help reduce the adverse safety effects.</p>	<p>24/11/2025</p> <p>Refer</p> <p>Commute, Technical Memo 24 November 2025</p> <ul style="list-style-type: none"> As per the Traffic Report and s92 response, there are three "pinch" areas The points A and B (below) and the eastern section of point C (now labelled as point D below) are considered to be physically possible to widen relatively easily. The remainder of point C is however extremely difficult due to a significant drop-off into the river on one side and a large rock cliff face on the other. This is also the area currently restricted to one-way due to slip in the rock face. <p>Figure 3-1: Segments of Hunua Road which require widening</p> 
4(c)	Hunua Road caters for school buses and coaches. Can the Applicant identify what school buses use Hunua Road, their frequency and confirm that a school bus and Scarbro truck can pass each other at the pinch points on Hunua Road. This should be demonstrated on tracking plans.	<p>13/10/2025</p> <p>Response from Commute.</p> <p>We understand from submissions and through recent site visits that the school bus route traverses the length of Hunua Road and Ponga Road in the vicinity of the site. Appendix A shows the tracking paths of a Scarbro truck / trailer vs bus in the critical areas.</p>	<p>Appendix A only includes tracking for:</p> <ul style="list-style-type: none"> Scarbro truck vs another Scarbro truck Scar Scarbro truck vs fire truck bro truck vs ambulance 	<p>24/11/2025</p> <p>Refer</p> <p>Commute, Technical Memo 24 November 2025</p>

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		The critical areas are the same areas as identified in the traffic report.	There is no specific tracking plan for Scarbro truck vs school bus at the conflict points.	<ul style="list-style-type: none"> The tracking has been updated based on revised aerial photo using drone together with a topo survey (LiDAR UAV/mobile laser scanner technology) of the road through the gorge This survey has provided much more accurate information of the key areas Updated tracking has been provided for all four options: <ul style="list-style-type: none"> Scarbro truck vs another Scarbro truck Scarbro truck vs fire truck Scarbro truck vs ambulance Scarbro truck vs school bus The plans also show the full widening required in the key areas to accommodate Scarbro truck vs ambulance and Scarbro truck vs another Scarbro truck. Given the detail of these areas, these files are large and have been provided in separate links.
4(d)	Hunua Road caters for school bus stops (that are unmarked) for school children getting picked up and dropped off by the school buses. Can the Applicant identify where these stop locations are and demonstrate whether Scarbro trucks have adverse safety effects on school children.	<p>13/10/2025</p> <p>Response from Commute.</p> <p>Rural bus stops are generally not sign-posted due to being in a rural area and a subject to change (depending on where school children live). From the Hunua School PTA submissions the current stops are listed as:</p> <ul style="list-style-type: none"> 1852 Hunua Road (opposite the site entrance) Hunua Road at Gillespie Road, Hunua Hunua Road at Middleton Road, Hunua 1712 Hunua Road, Hunua (top of the gorge hill) 896 Hunua Road (bottom of the gorge hill) Walkers Bush, Hunua Road, Papakura 	<p>AT are particular concerned with the increase in safety risk of school children in this scenario. The applicant should suggest mitigation measures to reduce any adverse safety effects such as (but not limited to):</p> <ul style="list-style-type: none"> Mark and signpost existing informal bus stops with clear signage. Warning signs for "School Bus Stop Ahead" and "Children Crossing" for truck drivers to see. Truck scheduling to avoid peak school transport times Provide a TMP that coordinates with local schools and bus operators to understand exact stop locations and timing. 	<p>24/11/2025</p> <p>Refer</p> <p>Commute, Technical Memo 24 November 2025</p> <ul style="list-style-type: none"> The rural nature of school bus stops means the stops can change exact location (depending of which houses / areas house school children). It is considered impractical to avoid trucks travelling in the area at peak school transport times and would lead to trucks unnecessarily stopping on the road waiting for school periods to finish. These areas are not typically in the gorge itself. As noted in the traffic report / s92, Hunua Road already carry large number of heavy vehicles. Even outside the site entrance (east of the gorge) the 2024 traffic survey recorded a Heavy Commercial Vehicle (HCV) volume of approximately 27.3% of the 5-day volume of 1,921 vehicles per day (524 heavy vehicles per day). As such trucks travelling in the area with school bus / children is common. The traffic count recording is included with this response. The proposal adds an average of 54 truck movement per day. This is an

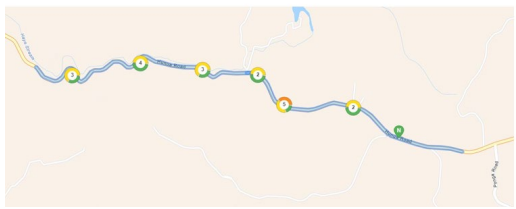
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				<p>increase of 2.8% of total volume and 10% of total heavy vehicles. As such the increase is minimal in regards to the overall existing environment.</p> <ul style="list-style-type: none"> We do however agree that the inclusion of W16-6.1 "school bus stop route" signs would be beneficial for truck / school children safety.
4(e)	Hunua Road is often closed during weather events and accidents on the road, limiting the use and access of Hunua Road. Can the Applicant confirm what temporary traffic management is proposed in a scenario where trucks cannot access the site via Hunua Road and what alternative routes they will use to access the site. If other routes are anticipated to be used as a result of this, the Applicant must demonstrate that alternative routes are suitable for the proposed truck volumes during Hunua Road closure events.	<p>13/10/2025</p> <p>Response from Commute.</p> <p>Should Hunua Road be closed then the Scarbro fill site would also need to close. No other routes will be used.</p>	Noted. No further questions	
4(f)	Can the applicant confirm if Scarbro trucks will need to park or queue on the side of Hunua Road to wait before entering the site. If this is anticipated, the Applicant needs to assess the adverse safety effects of this arrangement and if this is blocking sightlines outside the site entrance on Hunua Road.	<p>13/10/2025</p> <p>Response from Commute.</p> <p>No queuing on Hunua Road will occur (traffic engineer has confirmed that they cannot support any queuing on the road in this location). The design allows two-way movement (for trucks) near Hunua Road which then narrows to one-way across a bridge. As such the traffic engineer recommends all entering vehicles have priority (using one-way bridge signage) to avoid any queuing onto Hunua Road.</p> <p>Response from applicant.</p> <ol style="list-style-type: none"> No trucks & trailers would be parked on the site overnight. No trucks will arrive to the site in the morning before the opening hour. 	Noted. No further questions	
4(g)	It is understood that on some bends of Hunua Road vegetation is limiting some of the sightlines. AT notes that at some bends on Hunua Road, sightlines are impaired by the vertical cliff face. Can the applicant provide further assessment to confirm if there are additional sections of Hunua Road where the sightlines are blocked due to the cliff face.	<p>13/10/2025</p> <p>Response from Commute.</p> <p>There are indeed additional sections where sight-lines are limited by cliff face etc however these are in areas where two-way flow of trucks is possible. The areas identified in the traffic report are where two-way tracking of two large trucks is limited and visibility is limited (leading to the suggestion of mitigation of sightlines).</p>	<p>Satisfied with the applicant's response.</p> <p>We do not agree with the notion that all that is needed to ensure safety on curves where heavy vehicles need to track across into the opposing traffic lane is for there to be sufficient sight lines between drivers travelling in opposite directions for one or both to come to a stop before a crash occurs. I think it is unreasonable to assume that drivers (all drivers, but particularly those who are not associated with the proposed fill site) will be alert to the possibility that there may be a heavy vehicle crossing into their lane from the other direction and be ready to</p>	<p>24/11/2025</p> <p>Refer</p> <p>Commute, Technical Memo 24 November 2025</p> <ul style="list-style-type: none"> We agree that there are some corners where the trucks track over into the shoulder. This is due to widening of some corners that appears to have been specifically undertaken to cater for trucks on the outside of corners. It also matches our observations on-site of the existing situation. Following a review of the latest topo survey / tracking it is proposed to: <ul style="list-style-type: none"> Include the signage where truck movements are operating in opposing direction and improving visibility in the areas where tracking

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			<p>suddenly break to avoid a collision or take other evasive action.</p> <p>While good sight lines between drivers coming from opposite directions will help mitigate the potential road safety effects, this is not something which is sufficient by itself, the residual road safety effects even with mitigation in the form of improved sight lines are still significant. To ensure safety vehicles should be able to stay on their side of the centre line, and the applicant's assessment does not show this. 60% of the recorded crashes involving trucks on this section of Hunua Rd were serious injury crashes, it would only take one driver whose reaction time was higher than assumed by the sight distance calculations and did not brake to avoid the approaching truck and there could be a serious injury (or fatal) crash.</p> <p>There are places on the Commute drawings where trucks are shown tracking over the centre line on a curve with a cliff on the inside. Examples can be found on drawings T1, T2, and T4. In these cases the vehicle on the outside of the curve is shown tracking onto the shoulder to provide space for the vehicle coming the other way to pass into their lane. However, because there is a cliff on the inside of the curve it is not clear how the driver on the outside will know that they need to track onto the shoulder because they cannot see the other vehicle until they are very close. This relies on the driver of the vehicle in the outside lane being ready to make a quick decision to track onto the shoulder as soon as they can see the other vehicle. I do not think it is reasonable to assume this will always happen.</p>	<p>is constrained (as constrained in the traffic report).</p> <ul style="list-style-type: none"> - Upgrade / widen two out of the three areas identified as being constrained (Areas A and B) to accommodate two-way movement of Scarbro truck / trailer vs ambulance / van - Upgrade Area D to also accommodate two-way movement of Scarbro truck / trailer vs ambulance / van - In terms of Area C, this area is considered difficult to fully upgrade / widen, however it is proposed to widen by approximately 1m on the bank side to improve the overall situation. <ul style="list-style-type: none"> • The above measures are considering an improvement in the overall operation of the gorge, which is not only an improvement for proposed Scarbro trucks but also for every existing vehicle in the gorge. • As noted previously the proposal adds an average of 54 truck movement per day. This is an increase of 2.8% of total volume and 10% of total heavy vehicles over than previously surveyed in 2024. As such the increase is minimal in regard to the overall existing environment. • Overall, with the mitigation proposed and the small increase in traffic, the overall effect on the gorge is now considered neutral, if not positive. <p>09/12/2025</p> <p>Refer</p> <p>Commute, Updated Figure 4A-D attached.</p>
4(h)	Can the Applicant provide a more accurate truck tracking diagram through the Hunua Road, depicting the truck using the actual road carriageway rather than shoulders, drains and ditches. On these updated plans, please include	<p>13/10/2025</p> <p>Response from Commute.</p>	<p>We note that the drawings show trucks using the shoulders,</p>	<p>24/11/2025</p> <p>Refer</p>

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	the full truck and trailer to help visualise the length when turning and whether they would prevent other vehicles from safely navigating the bends concurrently.	Appendix A shows the revised tracking showing these features.	despite our request that this not be done in the RFI. We consider that trucks need to be able to stay on their side of the centre line for this proposal to not cause road safety effects	Commute, Technical Memo 24 November 2025 We agree that there are some corners where the trucks track over into the shoulder. This is due to widening of some corners that appears to have been undertaken to cater for trucks on the outside of corners. It also matches our observations on-site of the existing situation of what practically occurs and there are physical mitigation measures proposed by Scarbro together with Scarbro fleet management measures proposed to mitigate this.
4(i)	The cliff face on Hunua Road appears to be subject to rock instability during weather events. Can the Applicant provide further assessment to demonstrate that their truck movements would not cause rock instability of the cliff face due to vibrations of the truck and trailer movements. Large amounts of vibrations could cause rock instability and lead to rocks slips onto Hunua Road, resulting in adverse effects to the pavement condition and safety effects.	13/10/2025 Response from Fraser Thomas. The geotechnical assessment and reporting completed by Fraser Thomas Ltd to date has been limited to the footprint of the proposed Fill site at 362 Jones Road, Hunua. We have not been asked to assess the stability of existing batters associated with the Hunua Road corridor nor been provided with the relevant chainages where rockfall instability has been reported. We have nevertheless reviewed the Council RFI and offer the following response. Council has stated that during extreme weather events, rockfalls within the Hunua Road roading corridor may occur, impacting the carriageway and roading surface. We have assumed that, based on the description provided, the rockfalls comprise Waipapa Group soils and bedrock, exposed within cut batters associated with the formation of Hunua Road. It is noted that the overslip events are stated to occur only during extreme weather events, therefore implying that the cut batters associated with the formation of the road corridor are stable under static, 'wet winter' groundwater conditions. Given the rock fall events are not reported to be occurring regularly and are confined to extreme weather events we would conclude that the primary cause of the reported failures may be due to the increase in pore water pressure from the infiltration of stormwater and associated reduction in effective stress, lowering the shear strength of the soil and weakening of the structural integrity of the rock mass, leading to the reported failures in the rock. Stormwater would also act as a lubricant along fractures within the rock, exacerbating any planes of weakness. FTL review of historic aerial photographs within the Retrolens website database found that construction of Hunua Road predates the 1944 aerial photograph and therefore, given the age of the cut batters associated with the road corridor, rock slope failures are unlikely to be related to a local stress reduction or relaxation of the rock mass due to cut earthworks associated with road construction. This would also be consistent with the assumption that the cut batters are stable under static, 'wet winter' groundwater conditions.	FTL has concluded that the primary cause of the reported failures may be due to the increase in pore water pressure from the infiltration of stormwater and associated reduction in effective stress, lowering the shear strength of the soil and weakening of the structural integrity of the rock mass, leading to the reported failures in the rock. This is a qualitative generalized assessment. The statements are not based on any quantitative stability analysis. It would be sensible to carry out the stability analysis considering the accurate geology of the site and for the predicted loading scenario before making any concluding remarks. In terms of requiring further assessment, we require this under E12.8.1 (1)(b) as the applicant is seeking consent for an RD activity under E12.	

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		<p>It is also noted from a review of the 1944 Retrolens aerial photograph that quarrying within the eastern extent of the present day Hunua Quarry, located on Hunua Road, had commenced. It is therefore inferred that Hunua Road would have been subject to vibrations from heavy goods vehicle movements associated with transporting quarried aggregate, sourced from the area, for more than 80 years.</p> <p>Any heavy goods vehicle and trailers travelling to and from the now proposed Jones Road Fill site, via Hunua Road, will be required to comply with the relevant NZTA vehicle standard with respect to axle configuration and loading. Truck movements in and out of the cleanfill site will be restricted by Auckland Council consent conditions and likely dependant on vehicle mass as well as the configuration of the roads leading to and from the site. Project traffic engineers have undertaken an assessment of the proposed development with respect to traffic infrastructure as part of the consent submission and therefore, provided vehicle movements in and out of the Fill site are within the limitations provided by Auckland Council, the proposed development should not have an adverse effect on surrounding transport infrastructure.</p> <p>It would therefore be our opinion, given rockfall events are restricted to extreme weather events, the age of Hunua Road cut batters/Hunua Quarry and historic/current vibrations from traffic traveling along Hunua Road to date, that heavy goods vehicles and trailers travelling to and from the proposed Fill site should not have an adverse effect on the stability of the rock batters.</p>		
4(j)	The traffic survey conducted by the Applicant states that tube count data was recorded between Monday 18 March and Sunday 24 March 2024 being a 7-day period, however the results were only provided for the 5-day ADT. The Applicant notes that they will operate Monday to Saturday being a 6-day period. Can the Applicant confirm why only 5-days was included and not 6 days.	<p>13/10/2025</p> <p>Response from Commute.</p> <p>The reason is the 5 day periods was provided is that this is a typical metric used in traffic engineering while a 6 day ADT is not. Further the fill site is not operating all day on a Saturday.</p> <p>For completeness:</p> <ul style="list-style-type: none"> - The 5-day ADT for the corridor was found to be 1,921 vehicles. - The 6-day ADT for the corridor was found to be 1,832 vehicles. - The 7-day ADT for the corridor was found to be 1,809 vehicles. 	<p>For the 5-day ADT, the HCV volumes were recorded as 27.3% or 524 vehicles.</p> <p>The activity is operating for 7 hours on a Saturday and consider it relevant to consider 6-day ADT for this activity. As such we would like to understand what the HCV volumes are for the surveyed 6-day ADT. This will help recalibrate the HCV volumes survey and if this triggers for a PIA.</p> <p>ATs Principal Engineer for Pavements & Surfacing has advised that for this road if the annual total of HCVs is less than 10%, then a PIA will not be required. However, if the proposed truck movements exceed more than 5% of the existing HCV volume on a daily basis (ADT) then PIA needs to be undertaken.</p>	<p>24/11/2025</p> <p>Refer</p> <p>Commute, Technical Memo 24 November 2025</p> <p>We have attached the independent full traffic survey</p>

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4(k)	Fill sites are the busiest in summer when earthworks activity peaks on development sites. The seasonal peak is likely to be approximately 6-7 months between October – April/May. The worst case is 96 trucks per day generating 192 truck movements a day (in and out of the site). 192 daily trips for 6-7 months of the year, over a 10-year period could deteriorate the pavement quicker than originally anticipated. During this seasonal period, can the Applicant confirm that generating 192 daily truck trips would still be under the 10% HCV threshold that would otherwise trigger a pavement impact assessment.	<p>13/10/2025</p> <p>Response from Commute.</p> <p>In this regard we consider the “threshold” of a Pavement Impact Assessment (PIA) should be average volume and not seasonal peak operating volume of the site. This is because the total trucks over the year is the critical measure in determining impact on the pavement not just at any one peak time.</p> <p>During the seasonal peak time the truck numbers will exceed the 10% threshold but in a similar manor, during off seasonal times it will be less and hence the reason for using the average.</p> <p>On average (over a year), the additional trucks will not exceed 10% threshold (as per section 7 of the Traffic report)</p>	Please confirm the what the HCV volumes are for the surveyed 6-day ADT.	<p>24/11/2025</p> <p>Refer</p> <p>Commute, Technical Memo 24 November 2025</p> <ul style="list-style-type: none"> We have attached the full traffic survey. The percentage of HCV on each day is as follows: <ul style="list-style-type: none"> Monday 25.7% Tuesday 28.2% Wednesday 26.9% Thursday 28.0% Friday 27.9% Saturday 20.4% Sunday 18.5% 5 Day 27.3% 7 Day 25.4% 6 day 26.1%
4(l)	Can the Applicant confirm what maintenance methods are proposed to ensure that pavement conditions are not deteriorated over time due to truck and trailer movements. Where pavement damage is directly attributable to truck and trailer movements, how will the Applicant remedy this potential adverse effect.	<p>Response from applicant.</p> <p>The applicant would support a condition as follows.</p> <p>Road Pavement Monitoring and Maintenance of Vehicle Crossing</p> <p><i>Prior to the commencement of any activity involving heavy vehicle movements, the consent holder shall undertake a pavement condition survey 30 metres from the centre of the vehicle crossing that will be installed for site access, to identify the pre-construction condition of the road carriageway, shoulders, berms, footpaths, and crossings.</i></p> <p><i>a) The survey shall be carried out by a Suitably Qualified and Experienced Professional (SQEP) and shall include:</i></p> <ul style="list-style-type: none"> <i>High-resolution photographs;</i> <i>Descriptions and mapping of any defects (e.g. cracking, rutting, edge break, potholes);</i> <i>An assessment based on accepted industry standards;</i> <p><i>b) A report of the survey shall be submitted to Auckland Council for review and approval prior to works commencing.</i></p> <p><i>c) Annually and within 20 working days of activity completion, a post-activity pavement condition survey must be undertaken using the same methodology.</i></p> <p><i>d) If any additional damage to the public road network is identified in the survey (beyond normal wear and tear), the consent holder shall, at their own expense, remedy the damage.</i></p> <p><i>e) All repairs shall comply with the relevant Council standards.</i></p>	<p>30m is not considered appropriate to mitigate any damage done by the Applicant directly outside of the site. To ensure that any adverse effects to the pavement structure is appropriately mitigated, the applicant is requested to undertake a pavement condition survey on Hunua Road 500m west from the proposed crossing location and be held accountable to repairs if sought. This is because heavy trucks can start braking up to 500m before the point that they need to be slow enough to enter the site. Truck braking contributes significantly to pavement damage.</p> <p>This would be additional to any areas identified as needing repairs if a PIA is required to identify this.</p>	<p>24/11/2025</p> <p>Refer</p> <p>Commute, Technical Memo 24 November 2025</p> <ul style="list-style-type: none"> It is unclear where the 500m distance originates from The 30m relates to the truck turning which is considered most appropriate in terms of pavement damage The trucks will be entering the site (left turn) at approximately 10-20km/hr and approaching the entrance at an estimated 80km/hr From Austroads the braking or a reduction from initial speed V_1 to a lower speed V_2 under the same constant deceleration d, the braking distance is obtained by difference: $S_{brake} = \frac{V_1^2 - V_2^2}{254 \times (d + 0.01 \times a)}$ <p>From AGRD03-1 Table 5.3: Design domain for coefficient of deceleration the coefficient of deceleration for trucks on dry, sealed roads is provided as $d = 0.29$. Accordingly, for $V_1 = 80$; $V_2 = 15$; $d = 0.29$; $a = 0$ (minimal grade), the distance travelled by a heavy vehicle while braking has been calculated as follows:</p>

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				$S_{brake} = \frac{80^2 - 15^2}{254 \times (0.29 + 0.01 \times 0)} = 83.83 \approx 84 \text{ m}$ <p>As such a more appropriate distance is considered to be 100m</p>
4(m)	The Applicant has provided crash data from the period of 2019-2023 including all available records for 2024. Can the Applicant provide the crash data summary from the period of 2020-2025 being the last five years of data and most recent data. Can the Applicant also provide a breakdown of all the crash types that had trucks involved in them along Hunua Road. This is required to understand the latest crash data and safety effects.	<p>13/10/2025</p> <p>Response from Commute.</p> <p>An assessment of the surrounding area's road safety record has been undertaken using the NZTA's CAS database. Crash records for the five year period 2020 - 2024 including all available records for 2025, have been assessed for Hunua Road between Dominion Road and Ponga Road. As such, the search area covers 6.5km of rural road.</p> <p>A total of 39 crashes (20 non-injury, 14 minor-injury, 5 serious-injury) were reported within the search criteria as summarised below:</p> <ul style="list-style-type: none"> The majority of the crashes reported (26/39) were loss of control crashes. 12 of these were non-injury crashes, 11 were minor-injury crashes, and 3 were serious-injury crashes; Four were head-on crashes. Two of these were minor-injury and 2 of these were serious-injury; and There were no other inherent trends in crash types with one or two crashes identified for each of the following: manoeuvring, farm animal, overtaking, side-on crash, and rear-end. <p>While there have been a number of loss of control crashes on Hunua Road, these crashes are scattered along the corridor and are not entirely unexpected on high-speed rural roads. These crashes are unrelated to the subject site and therefore the proposed managed fill site is not expected to have any adverse effects on the road safety in the surrounding area. Furthermore, the speed reduction on Hunua Road, which occurred on 30 June 2022, is also expected to help reduce the number of loss of control crashes on this corridor.</p> <p>Out of the 39 crashes above, five of these involved truck movements. These crashes are detailed below:</p> <ul style="list-style-type: none"> Truck Crash 1 (non-injury): Three trucks were travelling along Hunua Road, and the front truck made a last-minute turn, not giving the trucks behind enough time to stop, and one of these trucks rear-ended the other; Truck Crash 2 (serious-injury): A car was approaching a left-turning corner and went over the centreline into the path of a truck causing a head-on collision; Truck Crash 3 (serious-injury): A car took a left bend corner too wide, crossing the centreline and clipping the front wheel of an oncoming trailer being towed; 	<p>1. There is a clear pattern of loss of control type crashes in the crash data, while this type of crash is often a run-off-road type where with a single vehicle involved (for example a vehicle hitting a road safety barrier or some other roadside object), the same things which increase the risk of loss-of-control type crashes also increase the risk of head-on type crashes, and if this were to happen between a truck and a light vehicle (car, van, etc) then the occupants of the light vehicle are at high risk of being seriously injured or killed.</p> <p>2. In regard to the statement that "While there have been a number of loss of control crashes on Hunua Road, these crashes are scattered along the corridor and are not entirely unexpected on high-speed rural roads." I do not accept the inference that the loss-of-control crashes in the crash data for Hunua Road is somehow typical for a rural road. The number of loss-of-control crashes on Hunua Road is very high given the length of road investigated and traffic volumes.</p> <p>3. While only 5 of the 39 crashes involved trucks and I note the applicant's comment that they have been involved less crashes proportionately given their number than other vehicle types, I also note that the crashes involving trucks were much more likely to result in serious injuries. 60%(3 of 5) crashes involving trucks were serious injury. Of</p>	<p>24/11/2025</p> <p>Refer</p> <p>Commute, Technical Memo 24 November 2025</p> <ul style="list-style-type: none"> A more detailed assessment has been assessment of the surrounding area's road safety record has been undertaken using the NZTA's CAS database for only loss of control crashes in the gorge itself (from the Quarry entrance to the site entrance). Crash records for the five year period 2020 - 2024 including all available records for 2025. The results show: <ul style="list-style-type: none"> A total of 20 loss of control crashes were recorded in the above study area, comprising of 8 non-injury crashes, 10 minor-injury crashes, and 2 serious-injury crashes. It should be noted that 8 of these loss of control crashes (40%) occurred at night when the fill site will not be operating. Figure 11-1 below shows the approximate location of the above crashes within the study area. In general, the loss of control crashes are quite spread out along the corridor. Areas A and C/D in Figure 3-1 previous had three loss of control crashes each, while Area B did not have any. <p>Figure 11-1: Locations of Crashes</p>  <ul style="list-style-type: none"> Following a review of the latest topo survey / tracking it is proposed to: <ul style="list-style-type: none"> Include the signage where truck movements are operating in

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		<ul style="list-style-type: none">Truck Crash 4 (non-injury): The truck took the right-bend too fast and rolled over, crushing the W-section barrier to the left; andTruck Crash 5 (serious-injury): The truck had overturned and collided with a powerpole. <p>The five crashes involving trucks / heavy vehicles, equates to approximately 13% of the total crashes. The 2024 traffic survey outlined in Commute’s Traffic Assessment Report recorded a Heavy Commercial Vehicle (HCV) volume of 25%. Therefore, the number of crashes involving heavy vehicles / trucks is proportionately lower than the total volume of heavy vehicles / trucks.</p>	<p>the 5 recorded serious injury crashes, 3 (60%) involved trucks. 100% (3 of 3) crashes involving both a truck and a light vehicle were serious injury.</p> <p>4. In regard to the speed limit reduction in June 2022. It has been more than three years since this reduction occurred and loss-of-control crashes are still occurring. If the applicant wants to make a claim that this has eliminated the issue or reduced it to the extent that it is not longer material to the proposal then they should provide more evidence.</p> <p>AT would like the applicant to provide more analysis of the locations of the loss-of-control crashes. We want to see if there are any particular curves or other locations where improvements to that part of the road could be used as mitigation the proposal, rather than asking the applicant to upgrade/widen the whole road.</p>	<p>opposing direction and improving visibility in the areas where tracking is constrained (as constrained in the traffic report).</p> <ul style="list-style-type: none">Upgrade / widen two out of the three areas identified as being constrained (Areas A and B) to accommodate two-way movement of Scarbro truck / trailer vs ambulance / van.Upgrade Area D to also accommodate two-way movement of Scarbro truck / trailer vs ambulance / van.In terms of Area C, this area is considered difficult to fully upgrade / widen however it is proposed to widen by approximately 1m on the bank side to improve the overall situation. <ul style="list-style-type: none">The above measures are considering an improvement in the overall operation of the gorge, which is not only an improvement for proposed Scarbro trucks but also for every existing vehicle in the gorge. <p>Attachment: Vehicle tracking / traffic count (as separate file due to size)</p>								
5. Ecology (Significant Ecological Area)												
5(a)	<p>For clarity, please confirm the areas and species of vegetation removal on the site as set out in the table format below. Note that vegetation in riparian areas and wetland setbacks should include details of loss of pasture and woody vegetation.</p> <table><tr><th>Proposed vegetation removal</th><th>Area and species</th></tr><tr><td>Vegetation with 10m riparian areas</td><td></td></tr><tr><td>Vegetation within 20m wetland setback</td><td></td></tr><tr><td>Other vegetation within the site (notably trees larger than 15cm dbh)</td><td></td></tr></table>	Proposed vegetation removal	Area and species	Vegetation with 10m riparian areas		Vegetation within 20m wetland setback		Other vegetation within the site (notably trees larger than 15cm dbh)		<p>07/10/2025</p> <p>Areas and species of vegetation removal on the site as set out in the table format included.</p> <p>Refer</p> <p>Boffa Miskell Limited 2025. 362 Jones Road: Ecological Report. Report prepared by Boffa Miskell Limited for Scarbro Civil Limited. Revision / version: 9 Issue date: 7 October 2025</p>	<p>18-12-2025 Received</p>	
Proposed vegetation removal	Area and species											
Vegetation with 10m riparian areas												
Vegetation within 20m wetland setback												
Other vegetation within the site (notably trees larger than 15cm dbh)												
5(b)	<p>Please provide an assessment of the potential effects on terrestrial ecological features and indigenous species that are or may be present in the wider landscape, with reference to nearby SEAs, covenants, ecological corridors, threatened ecosystems and species.</p>	<p>07/10/2025</p> <p>Refer</p> <p>Boffa Miskell Limited 2025. 362 Jones Road: Ecological Report. Report prepared by Boffa Miskell Limited for Scarbro Civil Limited. Revision / version: 9 Issue date: 7 October 2025</p>	<p>18-12-2025 Received</p>									
5(c)	<p>Please provide an assessment of the potential biosecurity risks of the fill operation, such as pest plants and animals and kauri dieback.</p>	<p>07/10/2025</p>	<p>18-12-2025 Received</p>									

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		<p>Refer</p> <p>Boffa Miskell Limited 2025. 362 Jones Road: Ecological Report. Report prepared by Boffa Miskell Limited for Scarbro Civil Limited. Revision / version: 9 Issue date: 7 October 2025</p>		
5(d)	<p><u>Non-s92 suggestion/comments:</u></p> <p>It is recommended to provide a bat management plan for the removal of trees on site over 15cm dbh. While not a specific requirement of the AUP, it is best practice as bats are protected under the Wildlife Act, which is administered by Department of conservation, and this could be provided in good faith under the Resource consent application to provide confidence that adverse effects on bats will be managed appropriately.</p>	<p>07/10/2025</p> <p>As previously expressed, the applicant is agreeable to a condition of consent to provide a bat management plan. We note that very few trees over 15 cm dbh will be removed.</p>	<p>18-12-2025 Received</p>	
5(e)	<p><u>Non-s92 suggestion/comments:</u></p> <p>It is recommended to increase riparian/wetland buffer planting to 20m wide.</p> <p>Although the 10-metre planted riparian margins will result in a net increase in indigenous habitats across the site, there is a lack of confidence that this width will sufficiently buffer the wetlands and streams on site from the potential impacts of the fill operation. While 10m riparian margins may be considered appropriate in a statutory context to buffer freshwater habitats from urban and rural productive activities, further considerations should be made to the proposed activity and potential effects in proximity to the freshwater habitats. Adverse ecological effects associated with increased sedimentation has been detected in all of Auckland's monitored harbours and estuaries, and higher levels of contaminants in muddy estuaries/tidal creeks is associated with intensively developed catchments that are subject to the current 10 metre wide riparian yard rules (2020 Auckland Council State of the Environment Report).</p> <p>A 20 metre wide planted margin is also more likely to establish as a more diverse and resilient indigenous riparian ecosystem, which requires less maintenance than a narrower margin that is subject to continuous pest plant invasion. Given the extent of proposed fill that will occur at the site, planting a 20-metre-wide riparian margin would provide greater certainty that freshwater habitats will be protected.</p>	<p>07/10/2025</p> <p>Additional riparian planting is proposed in the vicinity of the SEA.</p> <p>Landscape planting with indigenous species will also increase the overall native vegetation cover, which will have positive ecological benefits.</p> <p>As set out in the application plans and comments, sediment discharges will be managed through erosion and sediment controls in accordance with GD05 and to be approved by Auckland Council. Planted riparian margins are not proposed as the primary method of sediment management for this activity.</p> <p>Refer</p> <p>Boffa Miskell Limited 2025. 362 Jones Road: Ecological Report. Report prepared by Boffa Miskell Limited for Scarbro Civil Limited. Revision / version: 9 Issue date: 7 October 2025</p> <p>LA4 Technical Memo: 25 September 2025</p>	<p>18-12-2025 Received</p>	