

IN THE MATTER of the Resource Management Act 1991 ("RMA" or "the Act")

AND

IN THE MATTER of an application under section 88 of the Act to **WAIKATO REGIONAL COUNCIL** and **WAIKATO DISTRICT COUNCIL** (ref LUC0488/22) by **GLEESON MANAGED FILL LIMITED** to establish and operate a managed fill disposal activity at 310 Riverview Road, Huntly.

STATEMENT OF EVIDENCE OF JAMES DANIEL GLEESON

Dated 21 November 2022

1. **INTRODUCTION**

1.1 My full name is James Daniel Gleeson. I am the sole Director of Gleeson Managed Fill Limited ("GMF"). I am authorised to give this evidence on behalf of Gleeson.

1.2 This evidence is given in respect of resource consent application LUC0488/22 by GMF to Waikato Regional Council ("WRC") and ("Waikato District Council") ("WDC") to establish and operate a managed fill disposal activity at 310 Riverview Road, Huntly ("Site").

Qualifications and experience

Qualifications

1.3 Managing Director - Gleeson Group - 2004 to Present

1.4 Sales and Operations Manager – Gleeson and Cox – 1996 to 2004

1.5 Business Development – Gleeson and Cox – 1990 to 1996

- 1.6 Machinery Operator – various businesses and projects in NZ and Overseas – 1982 to 1990

Experience

- 1.7 My early career after leaving school involved operating heavy machinery and driving trucks, not only for the family business but for large companies and projects here in NZ and overseas.
- 1.8 I have been involved with the Gleeson and Cox family business full time since 1990, after learning that my father Brian Gleeson had been diagnosed with terminal cancer. In those early years I worked in all facets of the business to better understand operations, sales, and financial elements of the business.
- 1.9 In 2004 myself and Don Cox decided that the Gleeson and Cox business needed to head in a different direction, and an amicable settlement with Don Cox was agreed and I bought the Cox family out. Since then, we have gone through several economic downturns and a few tough decisions had to be made to remain in business.
- 1.10 It became apparent in a short amount of time that if we could operate our business safely and to the highest quality standards efficiently and transparently that would be our point of difference from our competitors.
- 1.11 Through hard work, determination, planning and having good systems and people the business has continually transformed and strengthened. Over the last 18 years the business has diversified and gone from being a small bulk transport company employing 20 people to a large bulk transport company, medium earthworks and civil company, and since 2018 acquiring the Huntly Quarry, the business now employs over 500 full time employees.
- 1.12 I acknowledge overseeing a business of this scale on my own is very difficult and having good people around me is testament to where we are today as a group, especially after going through the recent Covid pandemic.

Purpose and scope of evidence

- 1.13 The purpose of my evidence is to provide an overview of the applicant, GMF, and set out the background and rationale for the application.
- 1.14 My evidence is structured as follows:

- (a) Provides an overview of GMF, including its history and operations, and my role at GMF (Section 3);
- (b) Briefly describes the existing use of the Site and rationale for the application (Section 4);
- (c) Comments briefly on the type of managed fill disposal activity proposed and its associated benefits (Section 5);
- (d) Outlines the site selection process followed by GMF when determining whether the Site was appropriate for conducting managed fill disposal activities (Section 6);
- (e) Sets out GMF's ability to implement the proposal and comply with the proposed conditions of consent, including GMF's compliance record relating to other consents (Section 7);
- (f) Comments on issues raised by Submitters (Section 8);
- (g) Comments on proposed conditions of consent (Section 9); and
- (h) Provides a brief conclusion (Section 10).

1.15 A summary of my evidence is contained in Section 2.

1.16 My evidence should be read together with the other corporate evidence provided by:

- (a) Mark Pelan (financial);
- (b) Leigh Turner (operational and transport fleet);
- (c) Ross Twidle (operations); and
- (d) Seth Pardoe (corporate governance).

2. **SUMMARY OF EVIDENCE**

2.1 I am an advocate and champion for utilising robust systems and processes for continuous improvement. Over the last three decades I have invested a significant amount of time and money into technology, competent and experienced people as well as good equipment that is fit for purpose.

2.2 We pride ourselves on purchasing and operating quality machinery whether it be specially built trucks and trailers through to earthworks equipment and company vehicles.

- 2.3 Clean fills and managed fills are consented and sited, designed and operated so that adverse effects or risks on the environment, are avoided, remedied, or mitigated. Human health and the environment is therefore protected from adverse effects from operational or even closed cleanfills and managed fills by those mitigation measures.
- 2.4 Furthermore, the design of clean water diversions, sediment and erosion controls, subsoil drainage, and sediment retention ponds with the ability to test and treat as necessary are proven to manage and improve water quality for the down-stream environment. As well as the environmental considerations above on the receiving environment, structural and geotechnical design through engineered modelling is required for the buttress construction that will be required to hold and stabilise the fill material.
- 2.5 On reflection, since the day GMF acquired the Huntly Quarry, it appears we have been treated with suspicion by the community from likely transgressions of the past by the previous operator and other operators within the area. Early on, GMF had attempted to engage with the community on several occasions through community BBQ's, community sponsorship initiatives and attending community events upon invitation and initiation. From the outset GMF management and staff were met with negativity that appeared to be generated by a small group of people who are very vocal within the community about things they don't like. Unfortunately, we have been unable to engage with this small group for fear of making things worse for our staff who live in the community.
- 2.6 We are certainly open to re-engaging with community representatives who have the best interests of all community stakeholders. We see a constructive and open relationship is beneficial to all concerned as we need to live and work together within the Huntly and surrounding regions.
- 2.7 Furthermore, working closely with the Waahi Whaanui Trust will ensure our respective cultural and environmental responsibilities are monitored and managed appropriately.

3. **GLEESON MANAGED FILL LIMITED - OVERVIEW**

Company overview

- 3.1 While the story of Gleeson and Cox, as a company, dates back to 1967, its lineage goes all the way back to 1868 – this is when William Gleeson, great grandfather arrived in New Zealand with his family.

- 3.2 The Gleeson family's interest in transport started in the early 1960's, when the late Brian (Doc) Gleeson (my Dad) and his wife Margaret established BW Gleeson Carriers in Waiuku. Don Cox was related to a good friend of Brian's Dad, and the legacy began with Gleeson and Cox.
- 3.3 Don ran the Auckland side of the business, while Brian predominantly ran the southern end, which crossed over in the night. At the time, the company was doing a little general work plus the cream cans, but the majority of their work was bulk loads, which has been a staple for Gleeson and Cox ever since. In the 1970s, the company started growing through an opportunity with Glenbrook Steel Mill to cart export steel billets. They had around eight trucks in the fleet at that time, and never really grew much bigger than 10 throughout the '70s and even into the '80s, as some of the ventures dropped off.
- 3.4 Twenty years into the company's existence, Brian Gleeson and Don Cox were starting to see some real potential in the Auckland transport market. Unhappily, their sharpened focus on the city coincided with some economic hard times in New Zealand. However, hard work and the ability to adapt have always been vital elements in the longevity of Gleeson and Cox, which would see them forge 30 years together.
- 3.5 In 1982 as the second son of Brian and Margaret's three children, I was not that interested in the family business to start with. My ambitions were external, and I began driving a crane at the Glenbrook steel mill, which led to me pursuing work in Australia and America in the mid to late 80's, as the wages and travel opportunities were too good to turn down. I spent those years developing my own skills and experiences and working on a variety of major projects that broadened my professional and personal development.
- 3.6 However, my international pursuits came to an end in 1990 when I got the call that my father Brian had been diagnosed with terminal multiple myeloma. Within a short time, I was on a plane home to support my family and the Gleeson and Cox business.
- 3.7 When I arrived, Gleeson and Cox was down to around six people. There was a compression of the market with the recession and the share market crash, which resulted in hard times during this period. People stopped building houses; the government had no money to spend; no motorways were being built. Gleeson and Cox really felt the pain like the rest of the country.
- 3.8 Rather than giving up after the diagnosis and recession, Brian became even more relentless and was hell-bent on growing the business. Don was also

concerned about what was going to be left, so they had some challenging conversations. Throughout this, I was able to settle back into life in New Zealand, embrace the new business opportunity and start making moves myself, rather than being influenced and controlled by Brian.

- 3.9 In November 1994, four years after his first diagnosis, Brian (Doc) Gleeson died at just 55. This was a challenging time both personally and professionally for me, as Brian was such a significant role model and a big part of his family and business that his passing left a big pair of shoes to fill.
- 3.10 I had established solid credibility in the industry by the age of 28 and showed Don that he had the potential to create something big. Don was the front line, driving the trucks and dispatching the drivers, while I was on the road with a cell phone, running to the nearest fax to send a quote or sign a contract. I worked hard to develop relationships and before long had doubled the size of the fleet and won the contract for the Quay St realignment, Gleeson and Cox's biggest contract at the time.
- 3.11 This contract led to the purchase of six brand-new Western Stars at once, which created a strong presence for Gleeson and Cox as very few companies ran better gear. Soon after, drivers were knocking down the front door to drive them. To all those who had been uncertain about the future of Gleeson and Cox, this was proof we had successfully established our place in the Auckland and Waikato transport sector and that I was to take Gleeson and Cox into a brighter future.
- 3.12 In 2004, I embarked on a new journey on my own after buying out the Cox family. With renewed enthusiasm I continued to grow the company, relying on established relationships, professionalism, honest reputation and good old fashioned hard work. Out of respect for my father, Brian Gleeson and Don Cox, the Gleeson and Cox reputable name remains unchanged to this day.
- 3.13 In 2007, the company embarked on developing more advanced software that was not currently available for its fleet transport management system (TMS). This quickly led to tablets being installed into all trucks as a DriverAPP providing drivers with job and site information including the despatch operator having the ability to track all fleet vehicles wherever they were as well as capturing real-time data on truck speeds and location etc as technology advances have continued.
- 3.14 Getting used to expanding their horizons, Gleeson and Cox under my directorship went in another brave new direction in 2014. Gleeson Civil was

launched to fill a perceived gap in the market and supplement work for the growing transport fleet. Finding key staff and culminating 30 items of plant under the civil division, ranging from excavators bulldozers to rollers, has allowed the company to experience a number of successes in their new venture.

- 3.15 On November 1st 2018, the Huntly Quarry was acquired by the Gleeson Group from Stevenson's. The Quarry acquisition further induced efficiencies within the wider Gleeson business as it provided a natural vertical integration, and this is needed as the market becomes more competitive and clients such as Waka Kotahi, other Government agencies and major contractors use a variation of aggregates to build major infrastructure. Gleeson are a testament to the need for diversification in this ever competitive and challenging environment, and the GMF operation would further provide efficiencies to not only the Gleeson business but a whole range of clients who are always wanting competitive pricing.
- 3.16 As part of the quarry acquisition, there is a total land area of 528ha that borders the quarry mainly in the West, North and East which provides a substantial buffer zone. Aside from the quarry operation, we have embarked on a pine planting programme of 130ha in July 2022 and the balance of 165ha will be planted mid-2023.
- 3.17 The Managed Fill consideration was borne from enquiry and demand as customers from all avenues are looking for efficiencies in their respective business or government agencies. This has naturally led GMF to proceed with an Application for consent that would utilise valleys and land that would only be used for forestry as they have in the past.
- 3.18 Of note, the Huntly Quarry originally opened in the 1940's, owned by the Raglan County Council and operated by The Roose Shipping Company. In 1981, the Stevenson's purchased all shares off The Roose Shipping Company starting a new era for the quarry as Stevenson's – Mercer and Huntly.

My role

- 3.19 I am the Managing Director of the Gleeson Group of companies which includes GMF. My role oversees day-to-day operations at management and governance level across the group whereby by I have a competent and effective Senior Management team controlling the respective business units. I am often found walking around in each of the business units' operations talking to staff at all levels to ensure I am available and contactable, but also

getting a first-hand view of operational practices and improvements as required.

- 3.20 I am in daily contact with Senior Managers and key staff should I be needed or for decisions that need to be made that effects staff welfare and the business overall. The Senior Management team have delegated authorities and responsibilities, and this eliminates the need for me to micro-manage down to an operational level.
- 3.21 My responsibility as it relates to the Managed Fill operation will be overall governance, supporting senior management and staff and ensuring we manage compliance within the consent conditions granted to ensure we pose no negative effects on the surrounding and downstream environment.
- 3.22 I fully understand my obligations and responsibilities as a PCBU and take an active role in the business at all levels. Operating a consented Managed Fill operation will be no different.

4. **EXISTING USE OF THE SITE AND RATIONALE FOR THE PROPOSAL**

- 4.1 The Huntly quarry has been operating since the 1940's and was originally owned and operated by the Raglan County Council. Gleeson Group purchased the Quarry and buffering land holding of approximately 800 acres in 2018 from Stevenson's. The Quarry is consented to export 1.8 million tonnes of aggregates annually and operates within its consent conditions.
- 4.2 The proposed Fill areas border the extraction boundary of the Quarry and are valleys that have naturally seeded gorse and other pastoral weeds. This land bordering the Quarry has not traditionally been used for grazing livestock as no water has been reticulated to these areas in the past for livestock.
- 4.3 The proposed Fill areas are not considered suitable for future extraction, the locations are not suitable for future housing or developments and due to the proximity to the quarry site, will likely only be suitable for forestry in future. This means spoil or unsuitable materials from the larger cities can be transported to a suitable location that is not going to be compromised by ongoing urban sprawl.
- 4.4 Soon after the Gleeson Group purchased the Quarry, it became evident to me after numerous enquiries from CCO's, major clients and large contractors that there was a need for additional consented Managed Fill sites in close proximity to Auckland and Hamilton. Especially if the Fill site was in close

proximity to good quality aggregates. We engaged with experienced consultants after undertaking extensive due diligence and commenced the application process.

5. MANAGED FILL DISPOSAL ACTIVITIES AND BENEFITS

- 5.1 GMF have applied to Waikato District Council and Waikato Regional Council for resource consents to establish and operate a Managed Fill disposal operation that imports material to deposit within identified gullies (Fill Areas 2-4) located North West and North of our existing quarry within the same property. Up to 300,000m³ of fill is proposed to be deposited per annum and combined the fill areas will have an estimated capacity of 2,009,200m³. The fill areas are proposed to accept overburden from the quarrying activities from the site; imported managed fill and cleanfill, including construction and demolition material which may include asbestos containing soil and material, peat, marine sediment, and acid sulphate soils.
- 5.2 It is well understood that consented clean fill and managed fill operations support the use of land and the disposal of fill and waste generated by residential, commercial, industrial, and rural activities throughout NZ. Cleanfills involve the deposit of natural materials such as clay, gravel, sand, soil, and rock which have been excavated for areas of land which do not contain contaminants at levels greater than background concentrations, and which have no adverse effects on the environment. Managed fills involve the deposit of cleanfill material, contaminated clay, soil, rock and other inert materials that may have contaminants that exceed background concentrations.
- 5.3 After receiving considerable managed and clean fill enquiries and undertaking extensive research we have concluded a managed fill operation attached to the Huntly Quarry will offer significant benefits to not only a wide range of clients but offers important efficiencies to the GMF business across the board. With the effect of urban sprawl and the need to develop more land and build houses including commercial and industrial developments, and in some cases land that has been compromised by various effects in the past, building consents therefore require unsuitable material must be removed from those sites and deposited elsewhere before required ground improvements are made.
- 5.4 With most projects and developments, the need for suitable hardfill such as aggregates of varying types and specifications are required. Meaning a truck removing unsuitable materials (spoil in this case) from a development in the Te Rapa area for disposal at a consented managed fill site will likely return

with suitable hardfill (from Huntly Quarry in this case). Therefore, offering considerable savings on cartage and time as a simple example. Furthermore, it is highly likely that most if not all trucks transporting spoil to the GMF site will leave with aggregates, therefore offering efficiencies to not only the operator but their respective clients also. This translates to reduced operator costs, wear and tear, and therefore reduces carbon emissions.

- 5.5 Existing uses for the aggregates transported from the Huntly Quarry include railway ballast for Kiwirail, subbase and basecourse roading materials for CCO's and Waka Kotahi, subbase foundation materials, constituents for the manufacture of concrete products (such as foundations, bridge components, pre-cast tilt slabs, entrances and driveways, kerb and channel, concrete pipes manholes and cesspits etc), farm stock races, house and building hardfill and many more.
- 5.6 Cleanfills and managed fills are consented and sited, designed and operated so that adverse effects on the environment, are avoided, remedied, or mitigated. Human health is protected from the adverse effects of operational or closed cleanfills and managed fills by the mitigations.
- 5.7 The managed fill site will be managed within the consent conditions by an experienced management team and overseen by a newly appointed General Manager who has been involved with other cleanfill and managed fill sites for Fulton Hogan.
- 5.8 The local community will benefit across a number of areas with the addition of the managed fill site in Huntly. As they relate to the managed fill operation only, these benefits include:
 - (a) Developers being in close proximity to a consented managed fill site and backload aggregates;
 - (b) Career opportunities for school leavers wanting to live and work in the Huntly area;
 - (c) Employment of additional skilled and unskilled staff
 - (d) Housing (owned or rented);
 - (e) Local businesses and service providers (such as parts/ mechanical/ tyres/ engineering/ food catering/ plumbing/ electrical/ construction and materials; and

(f) Temporary accommodation for visitors (such as Motels, AirBnB, or BandB's), retailers offering food and fuel etc.

5.9 For the staff who work at the quarry and managed fill, it is proven that they spend their money within the community they live in and on most of what has been identified above. Additionally, they would use local schools, doctors, dentists, lawyers, bookkeepers, grocery stores, fuel outlets, and cafés and the like.

5.10 Other benefits include the increased number of SNA's that GMF have nominated and protected, the now protected long-tailed bat conservation area bordering Riverside Rd, and the full support of wetland improvement initiatives downstream of the managed fill sites.

5.11 There is a groundswell of people that see livestock farming is perceived negative impacts on climate change, land degradation, biodiversity loss, deteriorating water quality, and animal welfare and human health issues. To front foot this concern as an environmentally friendlier solution; GMF has completed stage 1 of converting the approx. 600 acre [buffering] farm into forestry for carbon farming, stage 2 is planned to complete planting of the balance in 2023.

6. **SITE SELECTION**

6.1 Historically the Land had been used mainly for forestry as cattle and sheep grazing was not a real option as no reticulated water was established.

6.2 According to past Stevenson employees, Fill area 2 had been tagged a potential overburden site by Stevenson's when they owned and operated the quarry and buffering land holding. Fill area 3 had been identified as a potential fill site by Stevenson's due to the nature of the site had been previously used as an Overburden fill site from the now redundant Weavers Crossing Coal Mine.

6.3 On reviewing all options available on the land owned by GMF that would lend itself to being suitable and accessible for managed fill sites, the area immediately bordering the quarry appeared the most obvious for several reasons after experienced consultants and industry experts were engaged to evaluate suitable fill sites. They concluded in summary:

(a) A fill site bordering the quarry is easier to maintain and manage as part of the existing quarry operation and consent conditions.

- (i) Although GMF acknowledge it will be managed under separate consent conditions and the managed fill operation has different considerations.
- (b) The existing quarry consent already has consented truck movements so minimal additional burden on the local community who have lived on-route to the quarry since the 1940's when the quarry first opened.
- (c) If the managed fill was proposed at the end of Hillside Heights Rd, where there are other suitable managed fill locations, then GMF would have created a new burden to the residents of that road by increased truck movements.
- (d) The proposed fill areas are natural valleys that are unsuitable in their current state for further quarry extraction, residential or commercial development or grazing stock.

7. MANAGEMENT OF THE MANAGED FILL DISPOSAL ACTIVITY

7.1 GMF, at board level, have made recent changes to the Management team and Structure of Gleeson Huntly quarry and proposed managed fill operations. New roles and responsibilities include:

- (a) A General Manager has been appointed to oversee the Huntly operations who has proven experience performance and reputation in administering managed fill sites against the consent conditions.
- (b) A dedicated Quality Supervisor has been appointed to administer and audit all aspects of quality control and compliance impartially, this includes all aspects of the managed fill operation and consent compliance.
- (c) A dedicated Health Safety and Environmental Coordinator has recently been appointed to administer and audit not only health and safety practices, but also environmental best practice and compliance.

7.2 A dedicated training and development programme will be implemented with all management and staff from the outset focused on consent compliance and mitigating risks and going forward reviewed quarterly and with new starters.

- 7.3 External to the GMF business, independent engineers, ecologists, and other service providers will be engaged to ensure the consent conditions are clearly managed
- 7.4 GMF wish to have a closer working relationship with the Waahi Whaanui Trust who represent the local mana whenua. We understand the importance of their cultural guidance and guardianship of the land and invite them to be an active participant in developing and monitoring the Maatauranga Maaori Environmental Management Plan (MMEMP).

Compliance history

- 7.5 Prior to late 2018, GMF is unaware of the previous operators' compliance history. When GMF acquired the Huntly Quarry late 2018 it was run down and evident that minimal funds had been spent in areas that were needed. A summary of improvements GMF concentrated on early on include:
- (a) All sediment retention ponds were cleaned out thoroughly to remove years of built-up sediments so discharge water could be flocced appropriately to improve water quality being reprocessed or discharged.
 - (b) A 10,000-litre water truck was purchased to spray down roadways within the quarry to keep dampened down to mitigate dust.
 - (c) Improvements to the truck-wash which had limited water and therefore no pressure to clean tyres and the undercarriage of trucks. A new truck-wash system was installed with unlimited capacity on volume or pressure.
 - (d) In late 2019, GMF sought quotes to upgrade the ramp onto the weighbridge and exit off the weighbridge, and the vehicle entrance to the edge of seal of the Riverview Rd carriageway including appropriate drainage with high performance concrete. An additional water pump and reticulation system with high pressure water jets is also being installed after the truck wash and weighbridge to further mitigate the carrying of sediments onto the roadway. This project was stalled when Covid hit the country in early 2020. Since that time GMF has been unable to resurrect that project until July 2022 as it was contingent on securing an experienced contractor to undertake the works.

- (e) This winter, Huntly Quarry has experienced an exceptionally high rain fall which has not helped in managing the tracking of sediments onto Riverview Road. GMF have hired an additional water truck, road sweeper tractor and employed independent traffic management support and industrial road sweeper on several occasions when required to assist with cleaning up the road, and in most cases daily.
 - (i) GMF have installed silt socks near drains on the roadside several times to manage sediments, but these have been continually removed by members of the public we suspect.
 - (ii) GMF have installed nearly 80m of additional concrete stormwater pipe (both 700dia and 1050dia) to better manage water ingress from neighbouring properties into the quarry operating environment.
 - (iii) The concrete works upgrade as identified above will be completed by mid-November 2022 and GMF will therefore be in a better position to manage and mitigate sediments being carried onto the roadway.
 - (iv) Once the upgrade project is complete, GMF is committed to engaging with the independent traffic management company and obtaining approval from the WDC to sweep the roadway with an industrial road sweeper from the quarry to the Roundabout at the intersection of Riverview Road, Rotowaro Road, Harris St and Tainui Bridge Road. GMF will engage with a contractor to repaint the dedicated turning lanes in front of the quarry entrance including the limit lines and centre lines as required to freshen them up. GMF will also clean the road marker reflectors on the sides of the road to freshen them up also.
- (f) Future quarry initiatives include the final installation necessary components and commissioning of a Lamella Plant, being a dedicated water treatment system so that processed water from the crushing plants can be reused. Due to certain components having to be made overseas and the ongoing effects of Covid on the supply chain, this has provided delays which we are monitoring closely.
- (g) GMF have also reviewed the management structure and delegated authorities as it relates to the functionality of the Quarry and proposed managed fill. Recent changes to the structure and

appointments of a (1) General Manager to oversee the operations, (2) Quality Control and (3) Health Safety and Environmental personnel to manage consent compliance.

8. ISSUES RAISED BY SUBMITTERS

8.1 The topics raised in submissions that I can comment are as follows:

- (a) Applicant's compliance history;¹
- (b) Allegation of prior draining of wetlands;²
- (c) Consultation with members of the community;³
- (d) The need for this managed fill facility;⁴
- (e) Hours of operation;⁵
- (f) Duration of the consent;⁶
- (g) How staff will be trained and checked to mitigate dust/noise/odour effects;⁷
- (h) Level of experience GMF has to manage the Site;⁸
- (i) Benefits to the local community of Huntly;⁹
- (j) Extra employment required for fill disposal activities to occur;¹⁰
- (k) Managed fill company separate to quarry company;¹¹
- (l) GMF's motive for the proposal;¹²

1 Submissions of: Dorothy Claire Molloy (#1), Kate Thomas (#6), Cyril and Marion Shanley (#9), Appollonia Johnston (#10), Andrew Parkin and Leanne Ralph (#17), Kathie Shepard (#21), Emily Joy Thomas (#25), Lorrel Cherie Mowles and Alex John Mowles (#36), Nicola Maplesden (#33), Clive and Pauline Kosoof (#38), Robert Hunt (#40).

2 Submission of Anthony Ernest Perkins (#2).

3 Submissions of: Denise Lamb (#3), Kate Thomas (#6), Daisy Thomas (#14), Emily Joy Thomas (#25), Nicola Maplesden (#33).

4 Submission of Paul Vitasovich (#16).

5 Submissions of: Jessica Rix (#19), Kathie Shepard (#21), Gaylene Aroha Himona (#22), Shirley McDonald (#35), Robert Hunt (#40).

6 Submission of the Department of Conservation (#12).

7 Submission of Kate Thomas (#6).

8 Submission of Allan and Bronwyn Kosoof (#11), Nicola Maplesden (#33).

9 Submission of: Andrew Parkin and Leanne Ralph (#17), Nola Morland (#18), Kathie Shepard (#21), Maree Frances Rutherford (#4), Nicola Vitasovich (#22), Lorrel Cherie Mowles and Alex John Mowles (#36).

10 Submission of Allan and Bronwyn Kosoof (#11) and Kathie Shepard (#21).

11 Submission of Alan and Bronwyn Kosoof (#11).

12 Submission of Jessica Rix (#19).

(m) Employment of subcontractors;¹³

The applicant's compliance history

- 8.2 GMF is unwilling and unable to answer to allegations against previous operators in the area, not just the Huntly quarry prior to late 2018, as it relates to compliance issues for their respective business operations, quarries, or mining.
- 8.3 GMF acknowledges there have been minor incidents since 2019 and these have been addressed immediately once highlighted to Management if not already being worked on by quarry management and staff. Dust nuisance is a daily challenge and we have purchased two water trucks to manage dust mitigation on internal haul roads and are administering water sprays to aggregate crushing plants. GMF have also upgraded the truck wash to better wash vehicles on departure. There have been consequences and respective staff responsible held to account.
- 8.4 GMF confirm that the Quarry has not received any serious abatement notices from WDC or WRC since the Huntly Quarry was acquired by GMF in late 2018. We have recently received one 'letter of direction' on September 15, 2022, for silt being tracked onto Riverview Road. This was immediately addressed to WDC satisfaction and closed out.
- 8.5 Furthermore, GMF have actively maintained the quarry entrance and associated Riverview Road in both directions with hired mechanical broom and water truck during the significant new concrete upgrade to the Quarry's truck wash weighbridge and entrance onto Riverview Road (works programme planned was July-November 2022).

The allegation of GMF's draining of wetlands

- 8.6 We understand this has been dealt with and closed out appropriately to the satisfaction of WDC.
- 8.7 However, as part of the managed fill investigation, and prior to the new freshwater legislation coming into effect, a drilling programme was required to ascertain the depth of fill material previously moved to fill area 3 by the Weavers Mine operators decades ago. This was needed to ensure an appropriate design was undertaken to address any contaminants (if any), subsoil drainage and buttress design for stabilisation.

13 Submission of Jessica Rix (#19).

- 8.8 GMF understands the area in question had a small portion excavated into channels to allow water to pond for stock water. The water was drained as no stock present, so a drill rig could be bought in to ascertain the depth of fill and the type of material present, so the proposed fill area 3 may require stabilisation works to mitigate environmental harm through engineered design.

Consultation with members of the community

- 8.9 Many attempts have been made to communicate verbally and in writing with the community since GMF has acquired the Huntly Quarry. Most, if not all, of the community meetings have been confrontational towards GMF staff and representatives. The last one was duly closed down by the mayor due to the community meeting organisers inability to chair a meeting in a fair and reasonable manner and proceeded to fuel the situation. Unfortunately, to this date we have been uncomfortable to reengage with these organisers or community in fear of continuing abuse or threats to our staff.
- 8.10 Going forward, GMF would be supportive of reengaging in community meetings if they were conducted and chaired respectfully with a small group of constructive minded people.

The need for this managed fill facility

- 8.11 After receiving considerable managed and clean fill enquiries and undertaking extensive research we have concluded a managed fill operation attached to the Huntly Quarry will offer significant benefits to not only a wide range of clients and the wider community but offers important efficiencies to the GMF business across the board.
- 8.12 With the effect of urban sprawl and the need to develop more land and build houses including commercial and industrial developments, and in some cases land that has been compromised by various effects in the past. Building consents therefore require unsuitable material must be removed from those sites and deposited elsewhere before required ground improvements are made.
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it is highly likely that most if not all trucks transporting spoil to the GMF site will leave with aggregates, therefore offering efficiencies to not only the operator but their respective clients also. This translates to reduced operator costs, wear, and tear, and therefore reduces carbon emissions.

- 8.14 Cleanfills and managed fills are consented and sited, designed and operated so that adverse effects on the environment, are avoided, remedied, or mitigated. Human health is protected from the adverse effects of operational or closed cleanfills and managed fills by those mitigations from the outset.
- 8.15 The managed fill site will be managed within the consent conditions by an experienced management team and overseen by a newly appointed General Manager who has been involved with other cleanfill sites for Fulton Hogan.
- 8.16 Furthermore, GMF has employed the services of a wide range of independent industry specialists who have experience and a far better understanding of what is required (end to end) than most people who are unlearned to investigate design and future proof all aspects of a consented managed fill site.

Hours of operation

- 8.17 The hours of operation proposed are in line with construction industry requirements which have differing working hours based on the project or their location as an example.
- 8.18 Additionally, trucks carting in fill material from a project will likely be leaving with aggregates, and in most cases for that project, in doing so backloading and creating efficiencies throughout the value chain for respective clients and contractors alike.

Duration of the consent

- 8.19 We are seeking the maximum term of 35 years on the basis there may be an economic downturn, or downturns. If this happens, there will likely be a delay in filling these sites to capacity which affects the commercial viability of our proposal.

How staff will be trained and checked to mitigate dust/noise/odour effects

- 8.20 A dedicated training and development programme will be implemented with all management and staff from the outset focused on consent compliance

and mitigating risks. Going forward, all management and staff will be reviewed quarterly, in particular, new staff members.

- 8.21 As with other key aspects of a business including plant and machinery as an example, a selection of Standard Operating Procedures (SOP's) will be prepared, audited, and implemented. Once these documents have been implemented and staff training has been undertaken, the respective staff member is tested to ensure they are competent. In the live environment, that same staff member is audited to ensure their competency is on par with the respective SOP and this continues randomly but also frequently.

Level of experience GMF has to manage the Site

- 8.22 GMF, at board level, have made recent changes to the Management team and Structure of Gleeson Huntly quarry and managed fill operations. New roles and responsibilities are discussed earlier, at Section 7 of my evidence.

Benefits to the local community of Huntly

- 8.23 There are various benefits of this proposal to the local community of Huntly. These benefits have been discussed in detail in Section 5 of my evidence.

Extra employment required for fill disposal activities to occur

- 8.24 GMF will need to employ additional skilled and unskilled staff for the managed fill operations internally and externally.
- 8.25 Apart from the staff related to the physical preparation and construction of the managed fill related works, for the operational requirements GMF will need an additional 4-6 operational staff immediately then reviewed thereafter.
- 8.26 Additional to this are maintenance staff for the safe and efficient operation equipment, external monitoring personnel and a number of independent industry experts.

Managed fill company separate to quarry company

- 8.27 As explained previously, new Management staff have been employed to manage key areas to ensure responsibilities and accountabilities sit in the correct place. These are additional roles that were not part of the business or structure until recently.
- 8.28 Additional staff will be required should the Managed Fill application be accepted.

GMF's motive for the proposal

- 8.29 GMF's motive for the proposal is driven by the opportunity for the managed fill to offer significant benefits to a wide range of clients, as well as efficiencies to the GMF business across the board. Furthermore, the effect of urban sprawl and the need to develop more land and build houses including commercial and industrial developments creates a need for GMF's proposal, as unsuitable material must be removed from development sites and deposited elsewhere.
- 8.30 Additionally, due to the ever-increasing costs to do business and more so in the last few years, companies have to look outside the square and review what they need to do to remain competitive. In most cases clients from all sectors are looking for a value for money proposition and are demanding their suppliers to offer efficiencies or savings where they can to retain that business.
- 8.31 Therefore, going forward, if the GMF proposal was accepted and consented, then full trucks would be coming to the managed fill site with fill for disposal and full trucks would be leaving the quarry with aggregates for a wide range of infrastructure projects.

9. PROPOSED CONDITIONS

- 9.1 GMF welcomes impartial and independent monitoring of the managed fill operation and also welcomes the opportunity to establish a consultative and constructive working group with community and mana whenua representatives.
- 9.2 GMF acknowledge there will be stringent consent conditions and the need for the business, management, and staff to operate within these conditions from the outset.

10. CONCLUSIONS

- 10.1 GMF has provided a fully compliant application for consent to operate a managed fill operation and commit to compliance with conditions of the consent. GMF have employed the services of a wide range of experienced consultants, among other experts in their respective field, to design and therefore mitigate any risks to the environment. These industry experts include ecological, environmental, geotechnical, structural, cultural, and operational expertise. These industry experts will all have a part to play in

the process going forward should the managed fill application be approved based on the relevant consent conditions they are aligned with.

- 10.2 GMF have offered several conservation initiatives that include wetland restoration, wetland compensation, additional SNA's, riparian and native planting, and a covenanted long-tailed bat reserve in acknowledgement of the importance of the environment.
- 10.3 GMF have restructured the Quarry and introduced new management so that the managed fill operation can be operated independently with appropriate responsibilities and accountabilities.
- 10.4 GMF's invite a closer working relationship with the Waahi Whaanui Trust so we can develop the Maatauranga Maori Environmental Management Plan (MMEMP) together so that it embraces both our environmental and cultural commitments.
- 10.5 Gleeson Group has the ability to bond the managed fill operation and has a current bank security facility of \$2m which is used for Civil, Transport, Quarry and Managed Fill projects as required. At any one time, GMF have circa \$1.m facility availability. As the business has grown GMF has been able to extend this facility with our primary bank whom we have a transparent relationship. Our facility is guaranteed against our strong asset base for the group.
- 10.6 The Waikato area as an example has limited suitable sites for disposal of fill. A Managed Fill site at Huntly will allow for far better utilisation of heavy vehicles, reduced trips, lower emissions due to the ability to backload aggregate, this will be a significant benefit in both cost and social outcomes for the Waikato construction market alone.
- 10.7 I have confidence in GMF's experience and ability to ensure that the Managed Fill operation will be operated to ensure compliance with consent criteria, and I fully support this application.
- 10.8 I have read and understand the proposed conditions and will ensure compliance as Managing Director of GMF.

James Daniel Gleeson
Gleeson Managed Fill Limited
21 November 2022