File ref: FTAA-2503-1037

17 September 2025

Stevenson Aggregates Limited
C/- Jessica Urquhart
Tonkin + Taylor Limited
By Email: JUrquhart@tonkintaylor.co.nz

Tēnā koe

Request for information from Stevenson Aggregates Limited in relation to the Drury Quarry Expansion – Sutton Block under the Fast-track Approvals Act 2024

The Drury Quarry Expansion – Sutton Block Expert Panel (the Panel) has directed the Environmental Protection Authority (EPA) to request further information from you under section 67 of the Fast-track Approvals Act 2024 (the Act), relating to the Drury Quarry Expansion – Sutton Block application.

At the direction of the Panel, the EPA is seeking the information outlined in Appendix 1 of this letter.

Supply of Information

In accordance with section 67(2) of the Act the Stevenson Aggregates Limited must:

a) Provide electronic copies of the information or report requested; or
b) Advise the EPA, with reasons that you decline to provide the information or report requested.

Please provide the further information to the EPA by **Wednesday 1 October 2025.**

If the information requested is not received, the Panel must proceed as if the request for further information has been declined.

Please note, the information will be provided to the Panel, the applicant and every person who provided comments on the application. The information will also be made available on the Fast-track website.

If you have any questions, please contact Alex Mickleson, Application Lead, by email at info@fasttrack.govt.nz

Nāku noa, nā

Alex Mickleson

Application Lead, Fast-track team

Appendix 1 – Information requested by the Panel

1. The development of the Haul Road and Stage 1 works will involve the diversion of Stream 4 lower. The Panel understands that the upstream reaches of Stream 4 and its tributaries may remain intact for up to 40 years and currently support native freshwater fish and fish habitat; therefore, maintaining connectivity to upstream habitat for native fish should be considered:
    a. What length is proposed to be piped/ culverted?
    b. Is passage for native fish proposed to be maintained, and if so, how?
    c. Please provide a drawing of the culvert in long section and cross section, illustrating how the native fish passage provisions of clause 70(2) of the National Environmental Standards for Freshwater (**NES-F**) will be provided for, if that is the intention.

2. Will there be any instances whereby the proposed application works will require the removal or displacement of ecological enhancement works authorised under an existing consent? If there are (for example downstream of the existing pond within the haul road alignment), please provide:
    a. a description of the extent and ecological status of those areas, and a map illustrating the location; and
    b. an explanation of how the loss of existing and future ecological values from previously consented and required ecological enhancements will be addressed.

3. How does the effects management package address the loss of potential habitat for bittern, pipit and long-tailed bats (identified as species that could potentially use parts of the Sutton Block)?

4. Rock forest is an endangered forest type and the loss of even small amounts is acknowledged (in the application material) to constitute a very high level of adverse effect. The purpose of Phases 3-5 strip areas – which include removal of the rock forest - is unclear, as this area does not appear to serve a purpose for the haul road or other infrastructure, and appears to contribute a very small area of extractable aggregate. Please:
    a. explain why loss of the rock forest on the north-west side of the existing pond cannot, or is not proposed to, be avoided; and
    b. clarify the importance of the Phase 3-5 stripping area to the application.

5. It is unclear how the site water diversion (new piped flow) into the existing quarry treatment system will maintain flow in the lower part of Stream 4 between the existing pond and the existing infrastructure that serves the current Drury Quarry Pit. The Ecological Impact Assessment refers to a 'diversion' occurring in this location; however, other parts of the application documents refer instead to the potential for dewatering to occur. Please clarify how the lower section of Stream 4 below the existing pond is proposed to be managed throughout the life of quarry.

6. Please provide a long section and cross sections of the new stream diversion proposed for Stream 4 (the new temporary stream channel along the true left bank of the pond, and along the true right bank below the existing culvert crossing point) to demonstrate '*a naturalised*

channel with meanders, variations in hydrology and large boulders, similar to the current stream reach, with no loss in current SEV values or stream length' as stated in Section 5.3.3 of the Ecological Impact Assessment.

7. Please provide an assessment of the percentage of the Sutton Block catchment that will be affected by the application works, and the predicted reduction in flows (without augmentation) to Stream 4.

8. Augmentation of Stream 4 by adding water is referred to. Where will this water originate from, and what is the anticipated quality upon discharge to the stream?

9. What are the values of the intermittent stream into which Stream 9 discharges ('northern stream')? What is the assessed risk of loss of aquatic values to this stream from the removal of Stream 9 and the catchment of this northern stream due to the development of the Sutton Block pit?

10. The Ecological Impact Assessment report includes an assessment of the direct effects of the application on stream, wetlands, habitat, and vegetation types. The potential for indirect edge effects has also been highlighted. How has the potential for dewatering to affect streams, wetlands, indigenous vegetation and the habitats of native fauna been included in the assessment of the effects on the environment?

11. Table 56 of the Ecological Impact Assessment states that multiple artificial roosts will be provided for any single bat roost discovered. How many artificial roosts will be provided for each bat roost discovered? Does a bat roost constitute a potential bat roost, or one that is actually in use – and how is that proposed to be determined?

12. From Stage 1: Phase 8 onwards, all work area site runoff will be directed back to the Drury Quarry Pit for treatment. SRP 1 will no longer exist and catchment flow from the increasing Sutton Pit works area will be diverted from Stream 4 to the Drury Quarry Pit. What would be the actual and potential effects of decreasing flow into the lower part of Stream 4, and how are those effects proposed to be managed?

13. The Ground and Surface Water Assessment states that '*[s]hallow groundwater within, and in the vicinity of, the Sutton Block expansion area is expected to be affected by the proposed quarry*' and that '*[f]or the purposes of assessing the amount of resource potentially affected, the ridgelines of adjacent gullies have been taken as flow divides in the shallow groundwater resource'.* The Ecological Impact Assessment does not include an assessment of the effects of drawdown of shallow groundwater on wetlands or streams adjoining the pit, or on adjoining catchments. Please provide:
    a. an ecological assessment of potential adverse effects of shallow groundwater reduction; and
    b. a map showing the predicted extent of drawdown indirect impacts on wetlands and streams.

14. The Ground and Surface Water Assessment discusses the potential effects of regional groundwater changes due to the project on the base flow of local streams. Loss of flow is predicted for the Maketu Stream, Hays and Symonds Stream, Hingaia Stream, Mangawheau Stream, and the Wairoa Stream. Please provide an assessment of the ecological importance of these loss of flows.

15. If augmentation is proposed to increase stream flows where drawdown may be expected, please confirm whether consents have been applied for groundwater takes and discharges to resolve this, including within streams where flow reduction is considered unlikely, but which may experience loss.

16. The loss of shallow groundwater and regional groundwater from the NT1 catchment is proposed to be resolved by treating the water derived from the Sutton Pit works and discharging it upstream of the NT1-8 station along the Southern Tributary. Where is NT1-8 relative to the Sutton Pit sump? Please explain how this process will avoid the risk of the project dewatering the lower reaches of Stream 4.

17. At the cessation of quarrying (ca 50 years), how are the pre-quarrying flows into Stream 4 proposed to be restored or maintained in the long term? The application material discusses augmentation of flow during quarrying, but does not discuss if flows to maintain Stream 4 will require augmentation after closure of the Sutton Block pit.

18. Table 52 of the Ecological Impact Assessment lists 'Parameters of wetlands impacted by the Sutton Block pit expansion area'. The wetlands listed in that able sum to 24,036 m^2, yet the sum communicated in the total for anticipated wetland loss is only 18,758m^2. Please explain the discrepancy.

19. How has the potential for indirect adverse effects on wetlands and streams been incorporated into the summed total of impacted features?

20. The Geotechnical Assessment Report notes that the slope stability analysis for inter-bench slopes is preliminary, and that '*instability may occur under assumed material parameters if the slopes were to become completely saturated*'. Some of those slopes are located through or in close proximity to wetlands and streams along the southern pit shell. The Geotechnical Assessment Report seems to advocate for laying back the batters flatter from the design proposed by Terra Mining to achieve a satisfactory safety factor. How has the risk of slope instability and the potential need for a greater extent of drainage/ earthworks along this southern boundary been incorporated into the ecological effects assessment with respect to the potential loss of streams and wetlands?

21. The Residual Effects Analysis Report: Streams and Wetlands, and the Net Gain Delivery Plans for Wetland Planting, and Riparian Planting are predicated on the scale of loss of streams and wetlands due to the project, with the type of loss being constrained to 'direct effects'. How

have indirect effects (in particular dewatering effects and slope instability response effects) been incorporated into these calculations?

22. The stream offset proposed incorporates the use of the SEV method with the enhancement of streams within SAL land and land at Tuakau, which will result in at least 3,341 m linear meters of stream restoration (that is, enhancement of existing values). The Panel notes National Policy Statement for Freshwater Management (**NPS:FM**) objectives that the loss of river (stream) extent and values is avoided to the extent practicable, and that an aquatic offset requires no net loss (and preferably a net gain) in the extent and values of a wetland or stream. The Panel understands that the effects management approach proposed here is to offset the loss of streams. Please provide further explanation as to how the proposed stream restoration programme:

    a. replaces the loss of stream extent; and
    b. otherwise meets (or addresses) the requirements of aquatic offsetting in Appendix 6 of the NPS:FM.

23. In regard to the proposed wetland offset site at Tuakau, how much of the area proposed as wetland offset is already natural inland wetland? The photographs of the site included in the Residual Effects Analysis Report: Streams and Wetlands appear to show most is already wetland. Please provide a map showing which parts meet the definition of a natural inland wetland and which parts do not (and why not).

24. The Residual Effects Analysis Report: Streams and Wetlands notes that '*[b]etween the river and the proposed offset wetland is a small stopbank which would prevent smaller flood events from inundating the wetland area*'. Is there an intention to remove this stopbank to improve hydrological connectivity to the river? If there is no intention to remove this stopbank, please provide evidence that the wetland offset site hydrology would be sufficient to support and sustain the proposed restoration works as a natural inland wetland.

25. Where the BCM is used to assess the wetland offset, why is the current wetland condition used for the Sutton Block wetlands, instead of a potential future state (the Panel understands that the NPS:FM requires that the 'future state' is considered when contemplating loss of ecological values for streams and wetlands)?

26. For the BCM wetland model, please provide an explanation as to why a 2 % contingency has been applied – such that the total anticipated impacted wetland in the Sutton Block is 1.91 ha, when the Ecological Impact Assessment states that 1.88 ha of wetland will be impacted. For example, does this 1.91 ha of wetland used in the BCM model include potential indirect impacts of the Sutton Block development on wetlands?

27. Monitoring for stream restoration areas is proposed for 5 years using the SEV as a monitoring tool. The SEV forecasts ecological gains over a roughly 15-20 period, so monitoring after 5 years is unlikely to report achievement of the predicted SEV gains. Please provide an

explanation as to why monitoring is proposed for only 5 years and what the implications are in terms of compliance reporting and assurance that restoration targets have been achieved.

28. Monitoring of ecological outcomes at the wetland and stream restoration sites at Tuakau do not appear to be proposed. Why is this not proposed, and how is monitoring intended to be undertaken in its absence?

29. To what degree do the Tuakau site wetland restoration activities replace wetland values compared to wetland extent?

30. Is there an ecological monitoring programme proposed for the stream and wetland offset and restoration sites? If not, what are the reasons why, and how is monitoring intended to be undertaken in its absence?

31. The draft management plans lay out the terrestrial monitoring frequency, attributes to be assessed and expectations for meeting restoration targets. However, reporting requirements are scattered throughout the monitoring sections of the plans. Please provide a concise description of the ecological reporting that will be provided to support the terrestrial offsetting and restoration works. Please include details on the frequency, purpose, targets for that period, biodiversity re-modelling requirements to track progress against targets, and contingency actions that will be applied (including consultation with Auckland Council where appropriate) should monitoring show that expected targets are not being met.

32. The Drury Creek Islands Recreation Reserve was previously proposed as a location for offset planting, including the planting of 113 totara of the total of 887 trees proposed to replace the relict trees removed from the Sutton Pit footprint. The Panel understands that the planting on the Drury Creek Islands is now no longer proposed. Is there an intention to undertake planting of the 113 totara at another location? If not, how is this deficit addressed in the offset replacement calculations?

33. The draft proposed conditions of consent do not include a financial bond for the ecological enhancement and restoration offset works (including monitoring, re-assessment and corrective actions, if any are needed). What are the reasons for this and how are the ecological works over the life of the consent otherwise proposed to be financially guaranteed?
34. Draft proposed conditions C18 – C23 currently do not include requirements to monitor and report success against targets, or to review monitoring results and adaptively manage where necessary. Please consider amendments to address these requirements.

35. Draft proposed conditions H7, H8 and H9 provide for short term and long term monitoring and reporting, (including comparison against offset targets) for terrestrial ecology offset works.

Please provide corresponding requirements for the stream and wetland offset works (i.e. offset targets, measures, monitoring and reporting).

36. Draft proposed conditions H7, H8 and H9 provide for 'contingency actions' should monitoring show that monitoring targets are not being met. Please consider amendments to address triggers for raising under-performance with Auckland Council, and a pathway for undertaking additional ecological offsetting works to address any shortfall anticipated or measured towards achieving the stated net-gain targets.