

File ref: FTAA-2503-1037

8 September 2025

Stevenson Aggregates Limited  
C/- Jessica Urquhart  
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By Email: [JUrqhart@tonkintaylor.co.nz](mailto:JUrqhart@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 **22 September 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](mailto:info@fasttrack.govt.nz)

Nāku noa, nā

A handwritten signature in black ink that reads "A Mickleson". The signature is written in a cursive, flowing style.

Alex Mickleson

**Application Lead, Fast-track team**

## Appendix 1 – Information requested by the Panel

### Noise Report

[1] The ‘*Drury Quarry – Sutton Block Assessment of Noise Effects*’ report, prepared by Marshall Day Acoustics and dated 26 March 2025 (**Noise Report**) refers to the modelling undertaken reflecting that there will be circumstances where both the existing pit and the Sutton Block pit are operating simultaneously. It also refers to modelling having been undertaken for construction noise. It is assumed that these were separate modelling exercises, or did the SoundPLAN modelling assess both (e.g. cumulative noise from operational and construction activities)?

[2] Based on the answer to the above, is there a need to include conditions that would prevent temporary construction activities from occurring at the same time as any other works (i.e. removal of overburden) within the Sutton Block? These would specifically be for receivers that may experience both, for example upper MacWhinney Dr and Sonja Dr.

[3] The construction noise limits recommended in the Noise Report match the AUP:OP (see Table 4 page 10). However, there was an assumption within the Noise Report that construction would not occur in the weekend or on public holidays, whereas the AUP rules include controls for those times. Is there a need to include these matters as conditions in the consents (i.e. the weekday controls in Table E25.6.27.1 apply, and there shall be no construction works in the weekend or on public holidays (excepting perhaps addressing emergencies))?

[4] Are there anticipated to be any rehabilitation works for the existing pit that would create noise at such a level that it ought to be modelled or otherwise addressed?

[5] Please provide a copy of the plan referred to in condition E2 (pit edge terrain screening for properties to the north-west)?

[6] The (temporary) northern bund does not appear to be specifically mentioned in the conditions, though it does appear on the landscaping plans. Please provide a specific draft condition for this.

[7] The Noise Report refers to an agreement that night-time activities in the Sutton Block would be limited to the base of the pit only (section 6.3, page 13). This does not appear to flow through to the draft conditions, nor into any management plan. How is this proposed to be provided for?

[8] Given the existing nature of the dwellings listed in the second bullet point on page 15 of the Noise Report (upper MacWhinney Dr), and that parts of two of those properties may receive even higher noise levels, what consideration, if any, has been given to acoustic mitigation measures / improvements for those properties?

[9] The Noise Report refers to the importance of the long-term noise monitors and how they could assist, in conjunction with the noise model, to keep a digital twin of quarrying operations up to date, and to consolidate the accuracy of future predictions. Their use for ground-truthing modelling and confirming the possibility of future compliance, seems important. Condition H4 refers to the two noise monitoring locations recommended in the Noise Report, but the data from those locations is only proposed to be used to demonstrate noise level compliance. Could a specific draft condition please be proposed for this (or condition C24 be amended)?

[10] Alternatively, it could be addressed by the Quarry Management Plan (QMP). The QMP conditions could contain more 'without limitation' specifics around what is to be included in the QMP, including in relation to the wider use of data from noise monitoring. Another option would be to update the draft QMP (28 March 2025, Stevensons) with this requirement and relevant details, and condition C24 could be amended to require that the final QMP be in general accordance with that draft QMP.

[11] Please provide a copy of Appendices D and E to the Noise Report with a column for the equivalent / indicative existing ambient noise level (actual measured if available, or modelled assumption).

[12] The complaints procedure outlined in the draft QMP (page 8) is reasonably brief, and condition C24 is similarly so. Please provide an updated QMP, or proposed amendments to draft condition C24. They do not for example:

- a. Provide details on how publication of contact numbers is to be achieved so that neighbouring owners and occupiers can find the contact number (for example on social media, local papers, company website(s), and on-site signage). Appreciating that available pathways can change over time, it would be useful to describe current proposals while allowing for future change.

- b. Outline a Communication Plan, as recommended in the Noise Report (page 16, last bullet point), regarding how neighbours (and relevant others) would be informed of the activities and timing associated with the Sutton Block development. SAL may wish to have a broader comms plan, but for resource management purposes we would like to see some advance warning of pending changes relating to construction and operational noise effects.

[13] Reading the Noise Report we did not get the clear sense that consideration had been given to the period of time over which some receivers are going to experience increased, possibly persistently increased (cf existing ambient), noise levels across the various stages of the pit life. Looking for example at the properties in the middle of Appendix D, Table D1 on page 21, there are a number that are anticipated to potentially experience 49-50+ from Year 3 all the way across to LoQ. Are there any further or additional comments that could be provided?

### **Blasting Report**

[14] The report entitled *Blast Vibration and Noise Study*, prepared by Orica and dated 13 December 2023 (**Blasting Report**) refers to blasting currently occurring once or twice a week, and that there had been 75 blasts year to date at the time the report was written. Currently the closest houses are 400m to 1000m away, but for the Sutton Block houses are 130m to 300m away. How many blasts are there per day on average when blasting is undertaken, and what is the range (i.e. min to max number of blasts), looking at the last two to three years of data?

[15] The Geotechnical Assessment from Riley refers to much of the excavation for the new pit needing to be done with blasting (see for example pages v, 47 and 48). Is the assumption of blasting being undertaken one to two times per week still accurate?

[16] What level, if any, of blasting is anticipated to be needed prior to ‘production blasting’? What would this entail? Page 30 of the Blasting Report refers to blasting in the Sutton Block only commencing “once the pit has been excavated down to a bedrock of such strength that efficient excavation becomes challenging”, and the importance of pit depth of mitigating noise is well understood by the Panel.

[17] The second sentence of the second paragraph of the Summary, page 7 of the Blasting Report, refers to there being no “need for such a study to be completed”. Some text appears to be missing here as there is no adjacent prior reference to a study. What is the study that is not considered to be needed?

[18] Please provide a copy of Section J from AS2187.2-2006. Are figures 10, 11 and 12 all taken from that standard? The tables themselves should be included in the draft consent conditions.

[19] The Panel is particularly keen to understand how Section J of AS2187.2-2006 might provide controls that would give appropriate protection to the physical attributes of the Karearea Pa site (particularly the stoneworks – stone alignments and heaps, facing remnants, stone rows and low walls, rectangular terraces, etc). Aside from the buffer area provided to that site, no specific blasting/vibration draft conditions appear to yet be in place:

- a. Has the project archaeologist been asked for advice in relation to the possibility of vibration / air blast effects on the stoneworks present at the Pa site arising from blasting? It does not seem to be referred to in the Clough & Associates Report.
- b. Should this site be monitored specifically (pages 10 and 27-30 of the Blasting Report suggest it should be)? If so, where? What controls or mitigations could or should be put in place should a physical adverse effect be identified?
- c. What vibration / air blast controls would be appropriate given the site does not contain physical (modern) buildings but holds significant cultural importance and does contain valuable archaeology? Would 5mm/s be appropriate (page 29)? More detail is needed on this in the conditions.
- d. Is there sufficient information available about the Pa site, for example site photographs and measurements etc, that would enable assessment of whether or not damage had occurred (for example, information of a standard that would enable pre and post blasting assessments to be made, as would be done in the case of construction works near heritage buildings)? Or are there cultural concerns that would make this information difficult or inappropriate to obtain?
- e. Page 28 of the Blasting Report (prepared in December 2023) referred to monitoring continuing at the Pa site for a further three months to gather more data. What updates are available?

[20] Draft conditions H5 and E5 don't appear to cross-reference well, or to accurately / clearly describe the processes of modelling, vibration monitoring, data management, and calibration (both in relation to modelling v monitored, and in relation to the seed holes). As distance is less able to be relied on, the need for well managed blast planning, loading, calibration and review practices will increase. The Panel is keen to ensure that current 'best-practice' is continued, and described better within the draft conditions. Can more detail please be provided in the draft conditions on:

- a. How many seed holes will be required, for example at what grid pattern, or in what locations, or is there a process that could be described for how these might be determined (i.e. by a SQEP)?
- b. What initial seed holes should be completed, along with smaller trial blasts, to calibrate the vibration model to best determine blast design constraints (and ensure compliance) (page 30 Blasting Report)?
- c. How will the model be calibrated and updated over time, and how will the need for additional seed holes be addressed (for example, as the pit deepens, as different rock types are uncovered, and / or to update the model for changes during wetter months)?
- d. The cross-reference in E5 seems to need to be to condition H5(e)?
- e. In the last sentence of E5 the Panel assumes that the vibration estimates are not what is used to calibrate the model, but rather a comparison of the estimate the model produced against the actual monitoring result.
- f. Condition H5(e) could similarly benefit from more detail. We understand that Orica and the current SAL team may know what is needed from the many years of operation of the monitors and model, but it is important that the conditions make sense to unfamiliar and future readers as well.
- g. Is one blast monitoring station enough (condition H5(a))? The Blasting Report refers to blast vibration and air overpressure monitoring being regularly carried out at 3-4 houses surrounding the existing quarry. As the Sutton Block is closer to dwellings than the existing pit a reduction in numbers (if that is what is proposed) seems inappropriate?
- h. Requirements for periodic review of blast vibration mitigation (e.g. the list on page 37) and air blast mitigation (e.g. the list on page 38) should be included in the conditions.

[21] The above is important because the QMP is only required to include “operational vibration management and monitoring” (condition C24)? Is this wide enough when the Blasting Report considers that compliant blasting is “very realistic”, but does not go further? The QMP should in the Panel’s view be required to provide the details needed to comply with draft conditions E5 and H5. As noted above, an alternative may be to update the draft QMP (so that it lists the relevant steps or considerations), with condition C24 then requiring general accordance with that draft.

[22] Is it intended that the CNVMP (condition C4) applies only to the construction of the haul road and northern bund?

[23] “Increase stemming” is referred to as one mechanism to help contain blasts. What does this involve, and should there be a reference to it in the relevant management plan conditions?

[24] The Air Report refers to blasting being currently completed between the hours of 9am-5pm Monday to Friday (page 16). Is a draft condition of consent to this effect appropriate? Would there be circumstances where blasting was needed unexpectedly, such that it couldn’t have been planned for in the preceding working-day week?

[25] Page 46 of the Blasting Report appears to contain an extract of outdated AUP:OP provisions relating to noise and vibration under Chapter H28, whereas pages 23-24 appear to set out the current provisions. Has the Report included the provisions set out at page 46 for any particular reason or are these provisions not relevant to the assessment and conclusions being reached?

### **Air Report**

[26] The *Sutton Block – Air Quality Assessment* prepared by Pattle Delamore Partners Limited and dated March 2025 (**Air Report**) refers to the existing earthworks consents which apply to “the majority of the proposed Sutton Block pit”. Is it possible to provide a plan which shows the areas that are not covered by the existing consents?

[27] Has any ground-truthing been done, or is any proposed to be done, for the CALMET-derived wind rose for the Sutton Block?

[28] For crushing within the Sutton Block pit, does rule E.14.6.2.2 refer only to existing dwellings, or might it also capture new dwellings? Even if those new dwellings need to establish in accordance with the rules that apply by virtue of the buffer zone, might there be a need to periodically check whether there are any houses within the 200m control?

[29] What is “rule A91”, in relation to activities in the rural zone requiring consent (page 10) a reference to?

[30] Draft condition C8(e), and possibly also F7, should be updated to include the mitigation measures (as options etc) outlined in sections 5.1.3; 5.2.2.1; 5.3.2; 5.4.2.1.1; and 5.4.2.2.1; the monitoring set out in Table 4 (page 25); and the triggers in 5.5.2. If these are in the existing DMP for the current pit, a cross reference to that plan may be acceptable (please provide a copy of the DMP if that is proposed).

[31] Section 6.2.5 of the Air Report includes a recommendation that a dust monitor be installed on the site boundary where works are within 140m of a dwelling. This does not seem to flow through to the draft conditions. Please provide an updated draft condition.

[32] Given the potential for health effects from RCS (albeit assessed as being very low), would it be appropriate to include some post-establishment monitoring and reporting to confirm whether the assumptions made in section 6.4.2 were appropriate? If so, please provide appropriate draft conditions.

[33] The extensive network of dust monitors proposed around the Sutton Block is relied on within the conclusion of the Air Report, but they are not directly required through conditions of consent. Rather, they appear to be required through the DMP. To address this, please provide a draft condition, or a copy of the DMP. One possibility may for example be to require that the Sutton Block DMP adopt sections of the existing DMP, so that mitigation, monitoring and triggers etc are all 'brought across' for the new pit.

[34] In section 6.4.2, is the "form of effect" referred to here the potential to contract silicosis (mentioned at the very end of the conclusion), or something else?

### **Geotechnical Assessment**

[35] Please provide a better quality version of Figure 4, page 10 of the *Geotechnical Assessment Sutton Block Extension Drury Quarry*, prepared by Riley and dated 14 January 2025 (**Geotechnical Assessment**).

[36] Instability concerns with the Waikato Coal Measures (WCM) are recorded in the Geotechnical Assessment, along with a recommendation that "trial batters within the WCM and volcanic slopes be undertaken and the findings incorporated into the final design" (pages iv, 21, 28, 41, 48). The Assessment recommends a process for this (for example, cutting faces at varying orientations and adoption of an 'observational-type' method in which the performance of the batters is assessed during trials while production extraction occurs elsewhere (see section 14.3.11)). An adaptive strategy seems to be needed. Draft condition C10 (Slope Stability Management Plan) does not contain this detail however, referring only to annual review and trial batters in the WCM. Please provide more detailed conditions to address this.

[37] The Geotechnical Assessment also refers to the importance of monitoring, and that “measurement, collation and analysis of defects, and their potential impacts of excavation and batter stability will continue as the quarry extension is developed.” This also does not clearly flow through into the draft conditions. Please provide updated conditions.

[38] The Assessment also refers to the need for trials of suitable blasting methods to minimise structural damage to the final batter profiles (prior to the formation of those batters), and to the final face being subject to inspection by a geotechnical professional. These do not seem to be reflected in the draft conditions, please provide draft conditions for this.

[39] The Assessment recommends proposed alterations to the pit design to minimise slope stability risks (section 14.3.10). These do not appear to be referenced in or adopted by the conditions. Would it be appropriate to include reference to these in the conditions, for example under the SSMP, so that they are periodically considered and reported on?

[40] Please check and confirm that all of the recommendations within section 17.0 of the Geotechnical Assessment are reflected in the draft conditions, or provide an explanation as to how they are alternatively addressed (for example, they may already be covered in management plans, in which case reference could be made to those plans).

## **Archaeological**

[41] The Archaeological Assessment (*Drury Quarry Extension, Sutton project, Drury, Auckland*, Clough & Associates Limited, March 2025) recommends (page 47) that recorded sites R12/278 and R12/723 be taken into account and clearly identified in the detailed quarry development plans, and draft condition B8 reflects that recommendation. The sites do not however appear on the staging plans included in the draft QMP, but presumably could easily be. Would an amendment to draft condition C24 be appropriate, or could an amended/updated plan be added to the draft QMP and condition C24 be amended to require that the final QMP be in general accordance with that draft?

[42] Noting the overlap with the Archaeological Authority applied for, is a consent condition requiring monitoring of earthworks by an archaeologist considered necessary (see bullet point 5 of the recommendations, page 47)?

## **Integrated Traffic Assessment**

[43] What, if anything, limits the number of traffic movements into and out of the existing quarry and FOH? There don't appear to be any conditions in the existing FOH consent, nor in the existing air discharge permit (it is understood that the concrete plant consent limits truck movements generated there to 110 per day). Is it purely internal capacity constraints and processing factors within the quarry (and existing FOH)?

[44] The Integrated Traffic Assessment (Don McKenzie Consulting Limited, dated March 2025) (**ITA**) refers to there being, generally, a total of up to 800 truck movements on a busy day, with typically 600-700 on an average day. A potential increase to 1,200-1,400 truck movements is then noted (page 13), with later references to "at least 2,000 tmpd" (6.1, page 21) and "up to an additional 8,000 tmpd" (6.2, page 21). Is there a natural maximum that ought to be applied, which would not unduly restrict the ability of the quarry to meet peaks in demand (for example, to meet the needs of major infrastructure projects, etc)? The Panel notes its understanding that key effects on the environment are managed through other conditions, and that the network has been developed with significant capacity.

[45] The Appendix to the ITA does not make it immediately clear what maximum tmpd/tmpd has been applied because, other than a brief concluding paragraph on page xi of the Appendix, it (understandably) references instead capacity, volumes, degree of saturation and intersection delay. Could the Panel be provided with some assurance that consideration has been given to the ability of the network to perform appropriately at the higher maximums stated?

## **General**

[46] Do the current wind/met, noise and blast / vibration monitoring sites work for the new Sutton Block, or will they need to move? Will there be a need to have sites for both pits, i.e. when the pits are operating at the same time? Where in the draft conditions are the locations for these sites described, or are they proposed to be left to management plans?

[47] Have any complaints from neighbours or Council enforcement action arisen for the existing quarry activity resulting from night time activities, specifically as a result of light spill or glare? Or is there evidence (measurements) that night time activity at the existing quarry complies with the relevant lighting standards of the AUP:OP?

[48] Notwithstanding the proactive approach to community liaison, is it a requirement, through conditions of the resource consent(s) for the existing quarry activity, to facilitate a formal Community Liaison Group process? Or is there an informal CLG in place?

[49] Does the applicant have a current long-term masterplan for how the landholdings are to be rehabilitated upon closure of the quarrying activity? It is understood that such information is required in response to the conditions of the resource consent(s) for the existing quarry activity; however, by extending the duration of activity on the site through this application, does that curtail timing for potential rehabilitation of the existing quarry pit on the site, for example?

[50] The record of property titles provided with the application material include many references to various instruments, including covenants and consent notices. Please provide a table summarising these instruments, where relevant to the applications before the Panel.

[51] At the end of Stage 4 and prior to Stage 5 commencing, it is understood that the northern bund is to be removed with this area becoming part of the quarry pit. How will protection of planting occur in this area (adjacent the ONL extent) and will additional planting be required outside of the pit extent in the location previously occupied by the northern bund? How will the immediate interface between the ONL and the quarry pit be perceived long-term?

[52] While the intent to establish fast-growing exotic vegetation is understood; how does such a mitigation strategy integrate with the wider restoration and rehabilitation of the site through establishing revegetation? Is a long-term approach required which would see the ultimate removal of this exotic vegetation with these areas also becoming revegetated?

[53] Please provide further detail on how the proposed new haul road, which is to be established in Stage 1, will cross the stream channel that is to be retained – will this be a bridge / culvert? If plans are available, please provide these.