

UNDER THE FAST-TRACK APPROVALS ACT 2024

FTAA-2503-1037

UNDER the Fast-track Approvals Act 2024

AND

IN THE MATTER of approvals for resource consents, wildlife approvals and an archaeological authority under the FTAA by Stevenson Aggregates Limited for the **Drury Quarry Expansion – Sutton Block**

MEMORANDUM OF COUNSEL

PANEL CONVENER CONFERENCE

17 SEPTEMBER 2025

BUDDLE FINDLAY

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Auckland

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MAY IT PLEASE THE PANEL CONVENER

1. INTRODUCTION

- 1.1 The purpose of this memorandum is to provide further updated documentation prepared by the Applicant in response to the Auckland Council's further information requests.
- 1.2 The Applicant lodged updated documents with the Environmental Protection Authority on 25 August 2025. Further queries were raised by the Council on the same date, in relation to the following topics:
 - (a) Transport (Auckland Transport comments);
 - (b) Stormwater;
 - (c) Groundwater;
 - (d) Watercare and
 - (e) Noise.
- 1.3 On 2 September 2025, Auckland Council then provided the Applicant with an updated Comments Tracker table, together with further supporting memorandum in relation to the following topics:
 - (a) Heritage;
 - (b) Landscape;
 - (c) Noise.
- 1.4 On 5 September 2025, Auckland Council provided further comments in relation to the ecology queries.
- 1.5 Direct engagement between the Applicant and its experts, and the Council expert team has occurred to resolve issues.
- 1.6 This memorandum outlines the documents prepared by the Applicant to respond to the Auckland Council further queries.

2. UPDATED DOCUMENTS IN RESPONSE TO AUCKLAND COUNCIL QUERIES

- 2.1 The Applicant provides the following:

- (a) Amended Auckland Council tracker table including further information to respond to the queries raised;
- (b) The following attachments in support of the Applicant's position will be provided separately for downloading:
 - (i) Attachment A – Applicant Updated Conditions Set 17 September 2025;
 - (ii) Attachment B – Memorandum addressing Auckland Council groundwater queries 17 September 2025;
 - (iii) Attachment C – Draft Quarry Management Plan 17 September 2025;
 - (iv) Attachment D – Memorandum addressing the ecology comments numbers 55 and 59 17 September 2025;
 - (v) Attachment E – Legal memorandum to address ecology queries 17 September 2025;
 - (vi) Attachment F – Hingaia (Drury) Island Offset Revegetation Update.¹

3. LEGAL SUBMISSIONS

- 3.1 The Applicant has also prepared legal submissions to support the substantive application, which are included in the OneDrive link with the documents listed above.

Dated 17 September 2025



**Bal Matheson / Vanessa Evitt / Natalie
Summerfield**
Counsel for Stevenson Aggregates Limited

¹ Note this memorandum was referred to in the Memorandum of Counsel for the Applicant dated 25 August 2025, but was inadvertently missed from the filed documents.