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 ON BEHALF OF THE APPLICANT IN RESPONSE TO MINUTE #5

6 OCTOBER 2025

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MAY IT PLEASE THE PANEL

1. INTRODUCTION

- 1.1 We act for Stevenson Aggregates Ltd (Applicant) in relation to its substantive application for the Drury Quarry – Sutton Block Expansion (Project). We refer to the Panel's Minute #5 dated 30 September 2025.
- 1.2 The Applicant welcomes the Panel's suggestion for expert conferencing on the following topics and confirms its experts are available to conference:
 - (a) Ecology;
 - (b) Economics; and
 - (c) Hydrogeology.
- 1.3 Informal discussions between the respective experts have already commenced, with a site visit for Jon Williamson (hydrogeology) being proposed for early this week. However, the Applicant considers a facilitated conference for the ecology topic is required to ensure progress is made.
- 1.4 To enable the expert conferencing to occur, the Applicant has provided a draft amended timetable which proposes conferencing to occur during the week of 13 October, with finalised Joint Witness Statements to be filed with the Panel on Friday 17 October. Accordingly, the Applicant requests that the application be formally suspended as of 7 October 2025, to enable the expert conferencing processes to proceed.
- 1.5 As a result, the Applicant also proposes to shift other key dates to allow the Panel time to consider the updated Applicant's draft condition set (due this Friday 10 October) and the outcomes from the Joint Witness Statements. The Applicant proposes a final decision date from the Panel of Friday 19 December. This date is the furthest date that the Applicant can provide, whilst still ensuring a decision has been made by the end of 2025.
- 1.6 A copy of the Applicant's proposed draft timetable is attached at **Annexure**A.

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1.7 The Applicant is happy to meet with the Panel for a short teleconference if there are any questions or points for further discussion.

Dated 6 October 2025

Bal Matheson KC / Vanessa Evitt / Natalie

Summerfield

Counsel for Stevenson Aggregates Limited

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ANNEXURE A: APPLICANT'S PROPOSED AMENDED TIMETABLE

Task	Working days	Date
Panel commencement	N/A	13 August 2025
Invite comment from relevant parties	10 W/D later	27 August 2025
Comments close (ss 53 & 54)	20 W/D later	24 September 2025
Comments close for applicants (s 55)	5 W/D later	1 October 2025
Any other procedural step and evaluation	2 W/D (approx.)	3 October 2025
Draft decision is to approve		
Applicant to provide updated conditions		10 October 2025
Conferencing		13 – 17 October 2025
JWS response by		17 October 2025
Draft decision and conditions to participants (s 70)		14 November 2025
Participant comments on draft conditions (s70(2))	10 W/D later	28 November 2025
Applicant response to participants on conditions (s 70(4))	5 W/D later	5 December 2025
Evaluate	3 W/D later (approx.)	12 December 2025
Any other procedural step and evaluation	2 W/D later (approx.)	16 December 2025
Decision release (75 working days from Panel Commencement)	3 W/D later (approx.)	19 December 2025

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