

**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**

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**MEMORANDUM OF COUNSEL OUTLINING THE APPLICANT'S RESPONSE TO  
COMMENTS AND THE PANEL'S MINUTE 12**

**4 DECEMBER 2025**

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**BUDDLE FINDLAY**

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## MAY IT PLEASE THE PANEL

### 1. INTRODUCTION

- 1.1 This memorandum is filed on behalf of Stevenson Aggregates Limited (**Applicant**) in relation to its substantive application for the Drury Quarry – Sutton Block Expansion (**Project**).
- 1.2 On 2 December 2025, the Panel issued Minute 12 which provided updated comments from the Panel following receipt of the Applicant's and other commentator comments on the Panel's draft decision and conditions.
- 1.3 Comments were received from the following parties:
  - (a) Auckland Council;
  - (b) Department of Conservation (**DoC**);
  - (c) Auckland Conservation Board;
  - (d) Te Ākitai Waiohū Settlement Trust;
  - (e) Heritage New Zealand Pouhere Taonga; and
  - (f) Tim MacWhinney.
- 1.4 Discussions between the experts have also occurred:
  - (a) Planning: Jess Urquhart (Applicant) and Doug Fletcher (Auckland Council), where agreement has been reached in relation to Conditions 30, 32, and 175(d)(ii); and
  - (b) Groundwater: Parviz Namjou (Applicant) and Jon Williamson (Panel advisor), where agreement has been reached in relation to Condition 122, and minor amendments made to Conditions 181, 188, 190 and 191.
- 1.5 The Applicant provides the following documents:
  - (a) **Attachment A:** Comment response table;
  - (b) **Attachment B:** Updated draft resource consent conditions;
  - (c) **Attachment C:** Archaeological Authority draft conditions;
  - (d) **Attachment D:** Wildlife Approval draft conditions; and

- (e) **Attachment E:** Updated Ecological Management Plan.
- 1.6 The Applicant has carefully considered the comments received and has made further amendments to the draft condition sets where agreed.
- 1.7 However, the Applicant considers a number of the proposed amendments, particularly from DoC, seek to include a level of detail that would create conditions that are more onerous than necessary – a clear conflict with section 83 of the FTAA. The Applicant considers the draft condition sets provided to the Panel today contain practical and appropriate conditions that reflect the level of flexibility required to implement a 50-year project. Further, much of the proposed changes from DoC to the management plan and monitoring plan conditions either duplicate content from the supporting technical reports that are incorporated into the resource consent via Condition 1, or contain incorrect material.
- 1.8 In addition to providing responses to the comments in the table at **Attachment A**, the Applicant has included comments boxes into the updated resource consent conditions which include the Panel's Minute 12 comments and the Applicant's response.

**Dated** 4 December 2025



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