

**Before Independent Commissioners Appointed by the Canterbury Regional Council and Selwyn District Council**

**In the matter of**            The Resource Management Act 1991

**And**

**In the matter of**            Applications by **Fulton Hogan Limited** for all resource consents necessary to establish, operate, maintain and close an aggregate quarry (**Roydon Quarry**) between Curraghs, Dawsons, Maddisons and Jones Roads, Templeton

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**REBUTTAL EVIDENCE OF DONALD GORDON CHITTOCK  
ON BEHALF OF FULTON HOGAN LIMITED**

**DATED: 21 OCTOBER 2019**

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## **Introduction**

1. My name is Donald Gordon Chittock. I am the National Environment and Sustainability Manager at Fulton Hogan Limited (**Fulton Hogan**).
2. I have previously provided a written brief of evidence in relation to the Roydon Quarry Proposal. That evidence is dated 23 September 2019. I confirm my qualifications and experience as set out in paragraphs 1 to 8 of that evidence, except that I would like to amend paragraph 3 to say the following:

*"I hold a Masters of Professional Studies in Environmental Management from Lincoln University. In 2016 I also attended the Kellogg Rural Leadership Programme where my research topic was about keeping communities engaged in collaborative processes using the Canterbury Water Management Strategy as an example."*

## **Scope**

3. In my rebuttal evidence I address the evidence of the following witnesses:
  - (a) Ms Gemma Conlon on behalf of the Templeton Residents Association (**TRA**);
  - (b) Mr Michael Smith on behalf of the TRA;
  - (c) Messrs Richard Shaw, Ian Clark and David Scarlett on behalf of the NZ Transport Agency (**NZTA**); and
  - (d) Mr Martin Flanagan.

## **Ms Gemma Conlon (TRA)**

### Code of practice

4. Ms Conlon suggests, in her paragraph 18, that the proposed Transportation Management and Routing Plan be called the Cartage Contractors Safety Rules and Guidelines. I consider the title should remain as is. From our consultation and engagement on the application it seemed clear the community is focussed on how trucks will get to and from the site. Having the title of the document as Fulton Hogan proposed signals to quarry users and cartage operators that it has a community focus. The content of the TMRP will be determined by the consent outcome. It will include Fulton

Hogan's Workplace health and safety requirements and will address other key requirements.

### Consultation

5. A number of considerations/recommendations are made by Conlon (para 48 to 53) in relation to the Community Liaison Group (**CLG**), Fulton Hogan is committed to the development and running of a CLG and used a group in the development of the application.
6. Fulton Hogan agrees that the CLG should be chaired by an independent professional and ideally one that is acceptable to the CLG and Fulton Hogan. If that cannot be agreed, Fulton Hogan would wish to be able to make the appointment. It is comfortable with the payment of reasonable costs for the operation of the CLG.
7. In the setting up of the Community Advisory Group (**CAG**) and the preparation of the consent application, the fuller focus and role of the CAG was determined by the group, and this approach is preferred by Fulton Hogan rather than high prescription in the consent process as proposed by Ms Conlon.

### **Messrs Richard Shaw, Ian Clark and David Scarlett (NZTA)**

#### Potential queueing / potential effects of queueing

8. Fulton Hogan has been active in understanding the traffic matters raised by NZTA and from the outset has committed to roading upgrades before the commencement of any quarry operations. By way of commitment to this traffic matter Fulton Hogan commissioned a second Traffic expert (Mr Kelly) to review and comment on Fulton Hogan's traffic expert's (Mr Metherell) proposals in September 2019. This additional resource was bought in after discussions with the NZTA staff ahead of evidence exchange, when it became apparent to Fulton Hogan that NZTA was yet to engage an expert for this application. Mr Kelly was brought in as a second traffic expert for Fulton Hogan to provide further expert rigour on the proposal, modelling, and other traffic related suggestions/recommendations.
9. Fulton Hogan continues to support engagement with NZTA and has a meeting organised on Wednesday 23 October 2019 to further try to identify and narrow any differences. It remains confident that an acceptable technical solution can be found. Fulton Hogan sought caucusing from the

hearing panel and understands that after all rebuttal is provided expert caucusing can commence ahead of the hearing.

10. Mr Wright for CCC has raised an issue in his paragraph 3.3 in relation to “documentation of the project model development, calibration”. I understand Mr Wright has not asked Fulton Hogan for any additional traffic documentation. If Mr Wright informs Fulton Hogan of what he is after, Fulton Hogan will provide what it can.

**Mr Michael Smith (TRA)**

Noise management

11. As mentioned in Mr Jolly’s rebuttal evidence, Fulton Hogan has overarching Quarry Management Plans in operational use at sites now to meet regulatory and operational standards of operations. It agrees there is benefit in the development of a Quarry Management Plan (Mr Smith’s para 26). However, I am not clear as to the reasoning or function of appended comments provided by the CLG as proposed (para 27).
12. The recommendation by Mr Smith (para 31) for Fulton Hogan to review the noise management plan prior to commencement of a new stage is appropriate and acceptable. I am unclear what he anticipates by way of a process for CLG to initiate a review.

**Mr Martin Flanagan**

Traffic/truck movements and identification

13. On page three (and table page five) of Flanagan’s submission reference is made to truck movements and tracking. At our three operational quarries and one retail yard Fulton Hogan already uses number plate recognition technology at our weighbridges. GPS or tracking systems are in use in many Fulton Hogan trucks now.
14. Fulton Hogan agrees to the use of number plate recognition within the site at the proposed Roydon quarry weighbridge to identify trucks. It also intends to use cameras on this site as is currently done on others sites for security and safety measures.

## Rehabilitation

15. Mr Flanagan's evidence talks of less than minor benefit to Christchurch from the proposed rehabilitation contributions on page four. Fulton Hogan can only propose activities that comply with the current policy and planning framework from Selwyn District Council and Canterbury Regional Council.
16. Fulton Hogan recognise that rehabilitation of the site is of great interest to the community and submitters and supports the biosecurity and biodiversity objectives of central and local government. The proposed rehabilitation plan, in terms of end use, is a living document. Community and government aspirations will change over time and no doubt, by the time end use considerations come around there will have been changes to it. Right now, the important thing is progressive rehabilitation to keep the canvas available.

**Donald Chittock**  
21 October 2019