

**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

---

**REBUTTAL EVIDENCE OF KELVYN MARK JOLLY  
ON BEHALF OF FULTON HOGAN LIMITED**

**DATED: 21 OCTOBER 2019**

---

---

**Counsel Acting: David Caldwell**  
Email: david.caldwell@bridgesidechambers.co.nz  
Telephone: 64 21 221 4113  
P O Box 3180  
Christchurch 8013

## **Introduction**

1. My full name is Kelvyn Mark Jolly. I am the Canterbury Quarries Divisional Manager at Fulton Hogan Limited (**Fulton Hogan**). In that role I am responsible for all quarry operations in Fulton Hogan's quarrying business within Canterbury. I have held this role since March 2019.
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 10 of that evidence.

## **Scope**

3. In my rebuttal evidence I address the evidence of the following witnesses:
  - (a) Ms Gemma Conlon and Mr Michael Smith on behalf of Templeton Residents Association (**TRA**);
  - (b) Ms Sara Harnett Kikstra on behalf of Yaldhurst Rural Residents Association (**YRRA**);
  - (c) Dr Stephen Chiles on behalf of Canterbury District Health Board (**CDHB**).

## **Ms Gemma Conlon and Mr Michael Smith (TRA)**

### Management plans

4. Ms Conlon at paragraph 16 of her evidence, and Mr Smith at paragraph 36 of his, both suggest developing an overarching "Quarry Management Plan" that would set out all of the practices and procedures to be adopted by the consent holder to ensure compliance with the conditions of the consent. During 2019 Fulton Hogan has implemented Quarry Management Plans across all operational quarries. This is to ensure consistency across the quarry business in meeting the various regulations the quarry business needs to meet. These regulatory requirements include not just environmental requirements but also health, quality and others and fulfil WorkSafe NZ requirements. On operational grounds, and as it reflects what Fulton Hogan is already doing, it does not oppose incorporating such a requirement here.

### Landscape management plans

5. I confirm the boundary planting referred to in paragraph 20 of Ms Colon's evidence commenced on the site in the planting season of 2018 and further planting and replacement planting in 2019.

### Onsite activities

6. Mr Smith, in paragraph 13 of his evidence, discusses the use of the mobile processing plant. His paragraph does not fully record what Fulton Hogan has stated regarding its site establishment. Fulton Hogan's preference is to use mobile processing equipment to establish the central area as opposed to other options which might include extraction of aggregate for offsite processing at another location. Fulton Hogan proposes to use mobile processing equipment as needed to support the fixed plant and that this will be located no closer than 250meters from the site boundary.

### Reversing beepers

7. Mr Smith addresses tonal reversing beepers in his paragraphs 17 to 20. Fulton Hogan's quarry sites supply to a range and varying scale of customers and trucks/fleet who purchase materials to meet their project or customer specifications or requirements. It has committed to ensuring that prior to entry to the proposed Roydon Quarry site all drivers will be inducted for site management, health and safety and consent requirements.
8. For Fulton Hogan equipment that is to be used in the operation of the site, there will either be flashing lights or broadband reversing beepers to meet workplace safety requirements. Fulton Hogan can control the tone of beepers on its own aggregate transport fleet and the use of broadband reversing beepers.
9. Through ongoing consultation and comment on the quarry proposal Fulton Hogan has created a draft quarry operational site layout that will result in trucks having a reduced need to reverse while on site other than tipping off material. For the loading of material on the proposed quarry site the draft ring road configuration means that trucks move forward when they are onsite. The only time that reversing would be required is in the tipping off of material and use of consented wash facilities. For clarity, when the reverse gear in a truck is engaged the tonal reversing beeper starts to alert other operators and staff of a reversing vehicle, and when moved out of gear the beeper stops.

## **Ms Sara Harnett Kikstra**

10. Ms Harnett (para 15) refers to early morning "convoy(s) of quarry trucks". Pound Road is a public road and a connector road north and south, and also services an industrial business park to the east. There may well be vehicles that move on those roads at varying times through the day and night to meet the demands of their customers carrying freight, produce or aggregates. Non-Fulton Hogan quarries have supplied aggregate for the last two years for the construction of the nearby Christchurch Southern Motorway Stage two project. Fulton Hogan, in the operation of the proposed Roydon Quarry, will establish a Community Liaison Group and amongst other things report on compliance to final consent conditions, if consent is granted. It has proposed a number of conditions to avoid the issues Ms Harnett Kikstra has raised.

## **Dr Stephen Chiles (CDHB)**

### Off- site trucks

11. Audible engine brakes are mentioned by Dr Chiles (para 32). I agree that only a small percentage of aggregate cartage trucks in New Zealand have audible engine brakes. Over time, as the truck fleet is replaced, different braking technologies will be used. The reference (para 33) that "Fulton Hogan will control every vehicle entering the site" needs to be clarified. Fulton Hogan proposes to have a code of conduct for drivers and companies that choose to use Fulton Hogan's site and purchase aggregates. Fulton Hogan will include a requirement in the drivers' code of conduct that no engine brakes can be used while on site. This will be supported by signage to that effect at the entry/exit of the proposed site. Fulton Hogan can also seek, subject to roading authority approval, signage on public roads. These are commonly seen on public roads.

**Kelvyn Jolly**  
21 October 2019