

**Before Independent Hearings Commissioners Appointed by 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

**SUPPLEMENTARY REBUTTAL EVIDENCE OF DAVID JOHN COMPTON-MOEN
ON BEHALF OF FULTON HOGAN LIMITED**

LANDSCAPE AND VISUAL – DAVINA PENNY EVIDENCE

DATED: 30 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 David John Compton-Moen.
- 2 My area of expertise is the assessment of landscape and visual effects. Since January 2018 I have provided landscape and visual impact advice to Fulton Hogan, including the design of the proposed landscape bunding, public paths and planting concepts to mitigate landscape and visual effects. I have also worked with Golder and Mr Victor Mthamo to develop the proposed Rehabilitation Plan and help identify potential uses for the quarry post extraction.
- 3 I have previously provided a written brief of evidence in relation to the Roydon Quarry Proposal. This includes the evidence dated 23 September 2019 and the rebuttal evidence dated 21 October 2019. I confirm my qualifications and experience as set out in paragraph 4 of my evidence dated 23 September 2019.
- 4 I also confirm I have read those parts of the Environment Court Practice Note 2014 relating to appearing as an expert witness, and agree to comply with it, in accordance with paragraph 6 of my evidence.

Scope

- 5 My supplementary rebuttal evidence addresses the evidence filed by Davina Penny.
- 6 In paragraphs 19, 21 and 71 of her evidence Ms Penny discusses matters to do with the grass bunds proposed around the site and the rehabilitation of the site post excavation. In the following paragraphs I comment on the matters relevant to my evidence and expertise, as discussed by Ms Penny.

Response to Ms Penny

- 7 Regarding concerns over the depth of topsoil proposed,¹ I am confident that 300mm of topsoil over and above 1m of existing material above the water table will provide a sufficient growing medium for grass and plant growth. In many projects, including subdivisions, we typically specify a depth of 300mm of topsoil to provide a healthy growing medium for plants. For lawn areas,

¹ Paragraph 19, page 11 of Ms Penny's evidence

we specify 50-100mm only, depending on the condition of the subsurface. Grass roots are typically shallow rooting.

- 8 In paragraph 21, Ms Penny states '*Absolutely nothing by way of detail, and certainly nothing that would instil confidence in us as residents, that there will be something other than a huge gaping hole at the end of operations.*' I am confident that the proposed rehabilitation plan will result in a pastoral landscape, albeit with a modified topography, that is in keeping with rural character and has a high level of visual amenity. In my opinion this is true with or without the perimeter bunds being retained.
- 9 A complete grass cover will be possible along with the planting of trees. The character of the area has a *geometric patterning of the landscape which is reinforced by cadastral boundaries, shelterbelts, pylons and roads.*² The rehabilitation of the site will allow for this patterning to be re-established. A high proportion of open space to buildings will be retained. The photo below was taken last year by myself at the Road Metals Quarry in Yaldhurst showing the finished, rehabilitated slope following completion of excavation works. I considered this view to be consistent, and of a similar scale/depth to what is proposed as remedial works for the Roydon quarry post excavation of a stage.



Figure 1: Road Metals quarry, Yaldhurst - post excavation rehabilitation

² Paragraph 133 of the Environment Court Decision no (2017) NZEnvc 165 Yaldhurst Quarries Joint Action Group and CCC and Harewood Gravels Limited referring to Mr Craig's Landscape evidence

10 Concerns over the settling of the bunds so that they are not 3m for the entire length of the consent have been raised.³ There is likely to be some settling but it is likely to be minor. The bunds are typically constructed by placing fill material in compacted layers which prevents any noticeable settling, before being covered with a 300mm thick topsoil layer. The 300mm topsoil layer will settle to a degree but given its relative thinness, it is considered that any settling will be indiscernible. If it is an issue, additional topsoil can be placed at a later date to ensure a 3m height is maintained. It is reiterated that the bunds are designed to work in combination with the proposed landscape planting to screen views into the site. As shown in the Miners Road example, the proposed treatment is effective.

David Compton-Moen

30 October 2019

³ Paragraph 71, page 33 of Ms Penny's evidence

ANNEXURE 1

CURRENT PLANTINGS

Site Notes: 21 September 2019

Two rows of landscape plantings have been completed along the Dawsons and Jones Road frontage. Species include, but are not limited to:

- *Pittosporum eugenioides* – lemonwood
- *Phormium tenax* – NZ flax
- *Podocarpus totara* Totara
- *Griselinia littoralis* – broadleaf
- *Cordyline australis* – cabbage tree
- *Poa cita* – silver tussock

The plant rows are staggered with plants at 2m centres with the largest plants being approximately 800mm high.



Photos taken of the plantings which have been undertaken along Dawsons and Jones Road