

**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

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

**LANDSCAPE AND VISUAL**

**DATED: 13 NOVEMBER 2019**

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## **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, 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. I have also prepared the Landscape Management Plan which is part of this application.
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. On 4 November 2019, I undertook conferencing on Landscape and Visual impact matters with Mr Wade Robertson (On behalf of SDC) and Ms Abigail Smith (On behalf of CCC). A Joint Witness Statement was prepared and signed on 8<sup>th</sup> November 2019.
5. 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.

## **Summary of Evidence**

6. I can confirm that all aspects of my report and evidence are still valid and I have no corrections to the level of effects determined during the operation of the quarry or post rehabilitation. I summarise the following key aspects of my evidence below:
  - (a) The receiving environment is currently going through a significant amount of change due to the construction of the Christchurch Southern Motorway Stage 2 (**CSM2**), the establishment of new rural-residential activities locating along the State Highway, and the growth of Rolleston. Rolleston has grown into a town of over 20,000 people in a relatively short time. The i-zone has increased in size and the inland port has

been established. The inland port often has containers stacked up to 6 high with large floodlights, estimated to be 20m in height. The inland port is located 4.3km to the southwest of the proposal site.

- (b) Quarrying is a rural activity as defined under the Canterbury Regional Policy Statement. The use of bunding and vegetation, combined with the staging of excavation and rehabilitation, to build upon the rural amenity of the surrounding landscape, will mitigate adverse effects of the development. By providing a visual screen, the proposal's scale and works are mitigated from having any effect of substance on the surrounding visual amenity values.
- (c) In terms of amenity values, focusing on aesthetic coherence, the receiving environment has a medium sensitivity to change. The area is characterised by a low density-built form, large pasture fields and transport infrastructure. Types of views are mixed with open expansive views available to the Alps but equally common are views contained by well-established, often dense shelter belts. Housing in the area is generally surrounded by well-established vegetation, assumed to have been grown to provide shelter from strong winds, with the closest suburban residential development being Templeton, approximately 700m away to the east. It is the straight roads, rectangular shaped fields and linear shelter belts which provide the aesthetic coherence to the area, allowing an eclectic group of land-uses to be located close to one another without greatly affecting the area's aesthetic coherence or people's amenity.
- (d) Overall, I consider that the highest adverse effects on landscape character is during construction of the grass bunds, with the largest impact being changes to topography, but that any such effects will be short term until grass establishes on the bunds. With the quarrying activities being staged, and plantings on the outside of the bunds occurring prior to Stage 1 excavation commencing, all other effects on landscape character can be appropriately mitigated or remedied, with a moderate level of change. I consider that during the quarry's operation the site will retain a distinct rural character which is in keeping with the surrounding environment with minor adverse effects due to the moderate magnitude of change.

- (e) Post operation, greatest change to landscape character and values will be on the topographical character of the plains with the creation of irregular internal slopes and a lowered ground level up to 10m below the original ground level. The residual effects reduce to low (less than minor) with the rehabilitation of the site to allow for rural pastoral purposes. The highest visual effects after mitigation will be experienced by those residential properties closest to the proposal at 151 and 153 Curraghs Road, and 319 Maddisons Road. For the Curraghs Road properties, the existing, albeit limited, semi-open views will be replaced with views contained by boundary plantings and the proposed landscape bunds. However, given that landscape plantings on the boundary are a permitted activity and could be (and have been) planted as of right, I consider the magnitude of change for these residents in visual terms is very low. Views will be possible of the proposed bunds, but the resultant visual effects are less than minor.
- (f) The use of bunding and planting along site boundaries provides for a visual screen around the proposal that enables the site to respond to the existing rural landscape character. The layering of both exotics and native planting on the bunding preserves the visual lines provided by existing shelter belts. A row of fast-growing pittosporums, hoherias, ribbonwoods, pines, macrocarpas, and eucalyptus trees will blend in with similar vegetative mixes found in the surrounding shelter belts neighbouring the site. The re-introduction of native species in the front two rows of planting provide a variety of species that allow for both visual interest to be maintained along extended lines of planting.

- 7. I am still of the opinion that the staging proposed by Fulton Hogan is appropriate with no benefits from changing the currently proposed process. As stated in my rebuttal evidence, changing the staging of excavation or preventing the commencement of quarrying operations until plants are 3m high will not result in any change to visual effects for the residents of Templeton. The closest residents in this direction are over 700m away and are largely already screened by existing (off site) shelter belts. The 3m high grass bunds around the entire site will prevent views of any quarrying operations and are not reliant on the height of the boundary planting.
- 8. As per my supplementary rebuttal, 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. The current topsoil

layer has been surveyed been 200-300mm in depth with a 300mm subsoil. This currently supports pastoral activities, with a similar growing medium provided post-rehabilitation.

9. In response to concerns over the bunds settling, 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.
10. During conferencing, it was agreed to clarify the staggered spacing of the internal row of trees (Row 3) in the shelter belts for locations where existing shelter belts do not exist. To make this clear it was agreed to provide two rows of trees, offset from each other. This widens the landscape strip in front of the bunds to 5.4m (previously 4.0m). Updated illustrations are attached for all Edge Treatments.
11. The following changes to the Landscape conditions and Landscape Management Plan have been agreed:
  - (a) Condition 13f, 80% grass cover required. The condition would now read '*The grassed bunds shall be watered, when required to suppress potential dust until a grass cover has been established. An 80% grass cover is to be maintained on earth bunds at all times during quarry operations.*'
  - (b) Under 5.2 of the Landscape Management Plan, the establishment period is to remain at 2 years, however the temporary irrigation system must be maintained for a minimum of 5 years following planting.
  - (c) The Edge Treatment planting should remain in place until the bunds are removed and establishment of grass cover is achieved over any disturbed land. This should be reflected in a condition of consent. A possible wording of this condition is: '*Once quarrying operations cease, the perimeter bunds are to be removed as part of the rehabilitation works. The edge treatment works (shelter belts) shall only be removed once a vegetated cover has been established over any disturbed land.*'

**David Compton-Moen**

13 November 2019

## 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 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.



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