

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

JOINT WITNESS STATEMENT
LANDSCAPE AND VISUAL AMENITY
DATED: 8 NOVEMBER 2019

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

Introduction

1. This Joint Witness Statement (**JWS**):
 - (a) Relates to landscape and/or visual amenity effects arising from Fulton Hogan Limited's proposal to establish, maintain and close the Roydon Quarry; and
 - (b) Reports of the outcomes of expert conferencing between the three landscape and/or visual amenity experts¹ who have filed evidence in this matter.
2. The expert conference was held on 4 November 2019, at the offices of the Canterbury Regional Council. John Hardie (Barrister and Mediator) facilitated the conference.
3. The experts involved have read Appendix 3 of the Environment Court Practice Note and confirm compliance with it.
4. The following are the issues discussed at the conference and the conclusions that we reached.

STAGING

5. Mr Compton-Moen and Mr Robertson are not recommending changes to the staging plan as per the August S92 response and as per Mr Blyth's evidence (see attached plan). However, Ms Smith has recommended changes (paragraph 9.2) to the staging to mitigate potential visual effects viewed in the site from Dawsons and Jones Roads and beyond.

THE BUND

6. We all agree the bund is necessary and we all accept that there are temporary short-term effects of constructing the bund, although we differ on the level/extent of effects. All experts agree that the bund should be constructed in its entirety prior to the commencement of Stage 1 quarrying activities as per the application.

¹ Wade Robertson (section 42A officer for Selwyn District Council); Dave Compton-Moen (witness for Fulton Hogan Ltd); Abigail Smith (witness for Christchurch City Council)

PLANTING

7. Ms Smith has differing views on the issues of planting from Mr Compton-Moen and Mr Robertson. We will deal with these issues separately.
- 7.1 The experts have agreed to the following changes to conditions and the Landscape Management Plan:
 - (i) 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.*'
 - (ii) 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.
- 7.2 We agree that an additional line of shelter belt planting should be established where there are no existing established shelter belts. We agree that the additional row of shelter belt planting be added to Row 3 (refer to Edge Treatment D, page 22 of LVIA Graphic supplement) and that the rows are offset from one another.
- 7.3 The critical means to establish and manage the planting is through the Landscape Management Plan (LMP). All acknowledge that detailed planting plans and specifications will be prepared for Certification by Selwyn District Council. Ms Smith had some concerns outlined in her evidence as to how it could be made more effective and this has also been addressed in the evidence of Mr Robertson (paragraph 70 a-f). We are in agreement that the matters in paragraph 70(a-f) are to be incorporated into the Certified LMP as a means of resolving our differing views.

POST REHABILITATION

- 7.4 We are all in agreement that the bund should be removed once operations of the quarry ceases, and as part of the rehabilitation plan. 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 operations of the quarry cease, the perimeter bunds are to*

be removed as part of the rehabilitation works. The edge treatment plantings (shelter belts) shall remain until grass cover has established over any disturbed land'.

Signed by:



David Compton-Moen



Wade Robertson



Abigail Smith

8 November 2019