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

In the matter of	The Resource Management Act 1991
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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

SUMMARY STATEMENT OF CRAIG ROGER STEWART ON BEHALF OF FULTON HOGAN LIMITED

DATED: 13 NOVEMBER 2019

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

- 1. My evidence provides:
 - (a) Details about Fulton Hogan, our commitment to the community, environment, sustainability, health and safety;
 - (b) The selection process for the proposed Roydon Quarry site; and
 - (c) The importance of the proposed Roydon Quarry.

Fulton Hogan and our commitment to the community, environment, sustainability and health and safety

- Fulton Hogan prides itself on being a family owned and operated company, as well as a company which cares about the environment, our communities and the people in them. We are an experienced quarry operator, with a strong track record, and a leader in the local aggregate industry (paragraphs 15-18).
- 3. Fulton Hogan manages its quarries with an "eye to the future", investing time and resource into continually improving our technology, environmental and work practices and quarry management. We fully intend Roydon Quarry to be a quarry of the future and, in doing so, to exceed industry performance standards in all respects (paragraphs 16-18 and 28). This reflects our commitment to well-run and environmentally conscious quarrying, the management of natural resources for future generations, achieving positive outcomes for communities and delivering best practice.
- 4. Fulton Hogan considers itself to be part of the communities in which it operates and is committed to engaging with communities throughout the life of our quarries (paragraphs 22-27). We believe that by listening and understanding the views of local communities and stakeholders, being respectful and transparent in our interactions, our people can create positive relationships with communities. Fulton Hogan works hard to avoid, remedy and mitigate effects arising from its operations through adopting best practicable options. We believe we have and are continuing to do so for this proposal (paragraph 25). We want to be a trusted neighbour and develop an enduring relationship with the surrounding community.
- 5. We have tried to be open and transparent with the Roydon community from the outset of this project. We have followed advice and have made considerable efforts to engage with the community. We are committed to

working with the community, stakeholders and Councils to ensure the proposed quarry operation, if consented, will not adversely impact the wellbeing of the surrounding community.

- 6. Fulton Hogan recognises the pivotal role of good environmental practice and sustainability - not only in its commitment to excellence in our quarries but in the business as a whole. We proactively use environmental management systems and innovative technologies, actively work to reduce our environmental footprint, invest in a clean energy future and are committed to a number of environmental projects and initiatives (paragraphs 29 to 36).
- 7. Safety and people are at the forefront of our company culture. Fulton Hogan puts the health, safety and well-being of people first (paragraphs 37-39). Health and safety is integral to the design, planning and execution of our work. If consented, Roydon Quarry will be developed in accordance with industry best practice in all respects and adhere to WorkSafe Guidelines to ensure a safe operating environment for staff and customers.
- 8. We believe our commitment to safety and the community is reflected in our response to concerns raised about traffic safety. Fulton Hogan has engaged and listened to two independent traffic experts. We are offering a substantial upgrade of the (currently unsound) Dawsons/Jones Road intersection. This will benefit people well beyond our own staff or customers.
- 9. Fulton Hogan is committed to continuing engagement with the community beyond the consent process and ensuring, as far as possible, the Roydon site is operated as a positive contributor to community.

Process for selecting the Roydon Quarry site

- 10. The process for selecting the Roydon Quarry site is addressed at paragraphs 40-51 of my evidence. Fulton Hogan invested significant time and resource into carefully considering a myriad of factors to identify potential quarry sites and to finally select the Roydon Quarry site.
- Fulton Hogan analysed the South West and West of Christchurch potential for greenfields sites and also considered expanding existing sites (paragraph 47).
- 12. The Roydon site was identified as being the most suitable for a number or reasons, including:

- (a) The quality and quantity of the aggregate resource;
- (b) The size of the site, which allows for generous setbacks including of the proposed central processing area and also for economies of scale in site and mitigation design;
- (c) The relative absence of sensitive uses near the proposed site;
- In contrast to the above, the relative prevalence of non-sensitive activities including airport noise contours, State Highway 1 and the train track;
- (e) The absence of planning constraints that might preclude or significantly limit potential quarrying;
- (f) The location of the site relative to demand in Southwest Christchurch an area where there is high demand for aggregate material and one which has historically been serviced by the nearly exhausted Pound Road Quarry for many years;
- (g) The proximity of the site to heavy vehicle transport routes.

Canterbury quarry and aggregates market and the importance of the proposed Quarry

- 13. The reality is, regardless of whether individuals want quarries or not, everyone relies on aggregate as part of every-day life.
- 14. The Christchurch rebuild generated an unprecedented demand for aggregate resources, including from Fulton Hogan's existing Christchurch quarries. The result is that supplies have been depleted much faster than projected (paragraphs 52-54). Even putting aside that spike in demand, there is an underlying need for more aggregate to support population growth (paragraph 56).
- 15. Demand is best met by utilising resources that are as proximate to demand as possible, because it provides a level of efficiency to the consumer and reduces environmental and social costs associated with transport at greater distances (paragraphs 55 to 56). However, there is limited access to new aggregate resources in or near the city of Christchurch for a variety of reasons (paragraphs 48 and 57).

- 16. Fulton Hogan has been and is committed to selecting appropriate sites as close as practicable – in this case it is the Roydon site. We believe the benefits of the proposed Roydon Quarry are significant in terms of enabling the continued provision of high-quality, cost-competitive aggregate and cleanfill facilities, close to the Greater Christchurch and South West markets.
- 17. Fulton Hogan believes the Roydon site is commercially and environmentally viable. Fulton Hogan is confident it could use the Roydon Quarry to provide a high-quality and cost-competitive aggregate resource while at the same time setting a new standard for exemplary practice in quarry management and rehabilitation.

Correction to earlier evidence

 There is only one correction to my Evidence. In paragraph 35 I would like to add that I attended Cambridge University Prince of Wale's Business and Sustainability programme in February 2019.

Craig Stewart

13 November 2019