

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

MEMORANDUM OF COUNSEL FOR FULTON HOGAN LIMITED SEEKING:

- (1) EXTENSION OF TIME FOR FILING CLOSING SUBMISSIONS; and**
- (2) FOR THE SITE VISIT TO INCLUDE THE POUND ROAD SITE**

DATED: 23 January 2020

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MAY IT PLEASE THE COMMISSIONERS:

1. The purpose of this memorandum is to respectfully request:
 - (a) a short extension of time for filing closing legal submissions until Wednesday 29 January 2020; and
 - (b) For the site visit on 4 February to include a viewing of the topcourse plant at Pound Road.

Extension of time

2. The applicant's closing materials are due tomorrow, 24 January. As noted in the applicant's memorandum of 19 December 2019, the closing legal submissions are to be accompanied by several supplementary statements of evidence. In addition to the statements foreshadowed, Kelvyn Jolly will also be providing a brief statement dealing with voluntary driver behaviour and annual processing rates.
3. The supplementary evidence is well underway and it is envisaged a number of the briefs will be filed prior to the amended deadline sought. In accordance with the applicant's approach throughout the hearing, it is intended to file briefs as and when they are finalised.
4. The applicant's advisors have had some difficulty obtaining information from the audio files of the hearing. For example, the full presentations of Dr Humphrey and Dr Seddon-Smith. The applicant has raised this with Ms Cooper in the hope entire recordings might be available to Ms Wagenaar.
5. No party is prejudiced by the brief extension sought. Conversely, this may be the last opportunity the applicant has to address the Panel and it wishes to ensure its closing material is as useful and clear as possible. Accordingly, the amended deadline of **Wednesday 29 January** is sought.

Site visit itinerary

6. We understand arrangements for the 4 February site visit have been made.
7. The applicant considers it would be helpful to the Panel if Pound Road was visited as well. The size of the topcourse plant at Pound Road is more akin to the size of the proposed Roydon processing plant and the nature of the

processing area proposed for Roydon, as compared to the much larger plant at Miners Road.

Dated 23 January 2020



D C Caldwell
Counsel for the Applicant