

**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 Road, Templeton

**SUPPLEMENTARY STATEMENT OF EVIDENCE OF ANDREW
METHERELL ON BEHALF OF FULTON HOGAN LIMITED**

TEMPORARY TRAFFIC MANAGEMENT

DATED: 28 FEBRUARY 2020

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

INTRODUCTION

1. My name is Andrew Alan Metherell, I am a consulting transportation engineer employed by Stantec New Zealand. I have previously prepared four briefs of evidence in respect of the consent application by Fulton Hogan to establish, maintain, operate and close an aggregate quarry at Jones Road in the Selwyn District.
2. As set out in my primary evidence, I have read the Environment Court Code of Conduct for Expert Witnesses and agree to comply with it throughout my further supplementary evidence
3. Within this supplementary evidence, I have been asked by Fulton Hogan to respond to Question 1 from submitters included in Appendix 1 of the Hearing Panel Minute 14, dated 10 February 2020.

“1. What route will trucks accessing or departing the proposed quarry take if the Dawsons Road railway crossing is unavailable due to planned maintenance or unforeseen events?”

4. From the outset, I note that the road network around Dawsons Road is being upgraded and this will minimise ongoing maintenance requirements. As previously advised, those improvements included CSM2 modifications at SH1 / Dawsons Road and the Dawsons Road railway crossing. In addition, the proposed Quarry related upgrade works at the Jones Road / Dawsons Road intersection will improve the northern approach to the railway.
5. There appears to be no reason for a repeat of the recent closures that have occurred at nearby railway crossings associated with the CSM2 construction. I understand that railway upgrades, such as those that have occurred elsewhere in Christchurch at different times, are generally scheduled to occur over a period of up to 1 or 2 days, and often during low traffic volume periods. A process will be followed where traffic is managed through a worksite, with a road closure being required only when traffic cannot be safely managed through the worksite (as discussed below).

PLANNED ROUTE CLOSURE PROCEDURES

6. Traffic impacts of railway level crossing closures that impact the road network, are governed by the NZ Transport Agency Code of Practice for Temporary Traffic Management (COPTTM).¹ Traffic Management Plans are

¹ <https://www.nzta.govt.nz/resources/code-temp-traffic-management#manual>

prepared according to COPTTM requirements by the contractor requiring the closure (or in this case potentially KiwiRail), and those are reviewed and approved by Traffic Management Co-ordinators appointed by the road controlling authority (**RCA**). The purpose of the Temporary Traffic Management Plan is to set out how traffic and road users will be safely and efficiently managed around the worksite, at all times.

7. In the vicinity of the proposed Roydon quarry, the review and approval of Temporary Traffic Management Plans is the role of the Christchurch Transport Operations Centre (CTOC)² and Selwyn District Council (or their delegates).
8. Specific procedures are included in COPTTM for approval and public notification of road closures. This includes requirements for advanced approval, and public notification³ of planned temporary road closures.
9. The Temporary Traffic Management Plan for a road closure would typically involve a detour route. Detours have to be agreed in advance, and COPTTM states⁴ that consideration is given to roads that are capable of handling the volume and type of traffic that normally would use the closed road. Consideration is also given to:
 - pavement (strength, surface)
 - geometry (width, terrain, intersections)
 - environment (dust and noise)
 - political (different RCAs, funding).
10. As can be seen, temporary traffic management planning involves advice and/or requirements around traffic route management based on the expected or actual traffic conditions, alternative routes available, and suitability of the routes. Major closures typically require traffic impact assessments to be submitted by those requesting a road closure.
11. I consider that traffic accessing the Fulton Hogan quarry will be obliged to abide by the operational route changes implemented by the approved Temporary Traffic Management Plan for the works. I would also anticipate

² CTOC cover the Christchurch City Council boundary, and SH1 to Rolleston

³ COPTTM C9.2.3 - At least 5 days' notice is required for the contractor to advise the public, after the approval of the RCA of the road closure

⁴ COPTTM C9.3.1

the presence of the quarry as a nearby traffic generator would be taken into consideration.

12. In my opinion it would generally be inappropriate to pre-determine a route requirement at this time, for what will be infrequent temporary events unrelated to the quarry. It could otherwise lead to a situation where a route requirement for the quarry conflicts with the outcomes required/desired by those responsible for managing the operation of the road network when temporary works are required.

UNFORESEEN EVENTS

13. Unforeseen events, such as an accident that restricts the use of the railway level crossing are also included in COPTTM procedures. In the event of an emergency, or unsafe road conditions that require road emergency services to close a road then the RCA is to be notified immediately. I understand that the RCA will work with emergency services to confirm the most appropriate response, such as setting up detours in a similar manner to planned closures. The response will relate to the duration of closure, time of day, and routes available at the time.
14. Again, it is my opinion that it would be inappropriate to predetermine a route at this time given the flexibility that is required to be retained for emergency services and the RCA to direct traffic.

TRANSPORT MANAGEMENT AND ROUTING PLAN (TMRP)

15. A road closure or unforeseen event will require vehicles entering and exiting the quarry to follow the temporary traffic management requirements, implemented “on the ground” by the RCA and those in control of the road closure. This could lead to a conflict with the route requirements of the TMRP. Currently the TMRP does not provide for exceptions.
16. In my opinion, where temporary traffic management measures are in place and outside the control of the quarry operator, any required route detours should be followed, and are a legitimate exception to standard route management procedures. They are put in place through a process of consideration of impact of route changes.
17. To provide clarity, the Condition specifying the content of the TMRP could include an exception or note to the effect that adherence to prescribed routes

may not be required if temporary closures or temporary events require other routes to be taken.

18. Regular review of the TMRP (including during certification) also provides opportunity to review whether a conflict, between the TMRP and a RCA approved temporary traffic management response to a railway level crossing closure, has created unforeseen issues that should be addressed in a revision of the TMRP.

CONCLUSION

19. In my opinion, railway level crossing closures will be an infrequent event that are only approved by the RCA after following a Temporary Traffic Management process. That process would also consider other methods to manage traffic safely and impacts on the surrounding road network.
20. In the event there is a temporary closure or event which requires certain routes of travel to be closed, it is my opinion standard temporary traffic management planning procedures administered by the RCAs and emergency personnel will dictate the routes available to those accessing the quarry. To avoid confusion, I suggest the conditions of consent and/or the provisions of the TMRP allow for a deviation from TMRP routes if temporary closures or temporary events require other routes to be taken.

Andrew Metherell

28 February 2020