

BEFORE THE CHRISTCHURCH CITY COUNCIL

RMA/2017/2111

IN THE MATTER of the Resource Management Act 1991
("the Act")

AND

IN THE MATTER of an application to expand an existing
quarry.

BETWEEN **ROAD METALS COMPANY LIMITED**

Applicant

AND

CHRISTCHURCH CITY COUNCIL
ENVIRONMENT CANTERBURY

EVIDENCE OF STEWART FLETCHER ON BEHALF OF THE NZTA

March 2018

My name is **STEWART FLETCHER** of Christchurch and I operate my own planning consultancy. The services I provide include contracting assistance to the NZ Transport Agency (the Agency). I have been requested by the Agency to assist them in the provision of evidence regarding their submission on the limited notified resource consent application for Road Metals Company Ltd to expand an existing quarry.

1 Qualifications

- 1.1 I am a Consultant Planner and have been practicing as a Planner for approximately 18 years. I have a Bachelor of Resource Studies from Lincoln University, am a full member of the NZ Planning Institute and a member of the Resource Management Law Association.
- 1.2 I have worked in a number of planning roles and have been operating my own consultancy for the past eight years.

2 Expert Witness Practice Note

- 2.1 While not a Court hearing I note I have read, and agree to comply with, the Code of Conduct for Expert Witnesses as required by the Environment Court's Practice Note 2014. In providing my evidence all of the opinions provided are within my expertise and I have considered and I have not omitted to consider any material facts known to me which might alter or qualify the opinions I express.

3 Scope of Evidence

- 3.1 A resource consent application has been lodged by Road Metals Company Ltd to expand an existing quarry. Aggregate is proposed to be extracted from land at 581, 619 and 635 Buchanans Road and transported through internal haul road back to the main quarry site at 394 West Coast Road for processing. Detailed descriptions of the activity have been included in the application, further information, planners report and evidence provided by the applicant. I rely on these descriptions rather than repeat them in my evidence.
- 3.2 The submission of the Agency was in opposition to the proposal on the basis that issues with the vehicle access should be further considered and suitably addressed as part of the resource consent application process. It was sought that the current access arrangement is reviewed and any identified improvements made within a specific time period. In addition it was sought that procedures were established to minimise the dropping/tracking of material on to the State Highway as vehicles depart the quarry. This evidence expands on the issues raised in the submission and complements the evidence of Mr Tony Spowart, Principal Traffic & Safety Engineer, for the Agency.

4 Consideration of Vehicle Related Issues

4.1 It is noted that the applicant has specified that the number of vehicle movements associated with the application site are unlikely to change as a consequence of the proposed activity. To this end it is understood the applicant has previously suggested that the Agency is not potentially affected by the proposed activity.

4.2 This issue is for the most part a moot point as the Council have elected to notify the Agency as part of the limited notification process. That said I wish to make it clear that it is considered entirely reasonable to consider the effects of the proposal on the State Highway. The reasons for this are:

- It is important to understand if there are any issues with the existing access otherwise if there are any faults or matters needing addressed then the approval of any consent will allow potential safety issues to continue;
- The proposal will prolong the continuation of the activity from the site whereas the lifetime for the use of the access may have been shorter.
- The access would have been originally formed at a time when standards were potentially different and the proposal should be assessed against any relevant updated standards.
- As detailed in the Agency submission, there has been issues in the past due to the depositing of material from the application site on to the State Highway.
- Finally, and potentially most importantly, the characteristics of State Highway 73 have changed significantly over time including the number of vehicles passing the application site and also the type of vehicles using the Highway. This includes increases in heavy vehicle numbers. This is a reflection in the growth to the west such as West Melton and Darfield but also the increase in quarries and associated gravel demands in the local area. It is understood the number of vehicle movements has increased by approximately 42% between 2007 and 2016.

4.3 Overall, it is considered appropriate to assess the impacts of the proposal on the State Highway and whether any additional measures are required as a consequence of the proposal.

5 Consultation

5.1 It is noted, and as previously specified by Mr Andrew Metherell in his evidence, since the notification of the proposal the Agency has had some discussions with the applicant including an on site meeting. There was general agreement as to the

need for some minor improvements to the access and also that procedures needed to be formally established to minimise the risk of material being deposited on the Highway from the application site.

- 5.2 Due to the time constraints of the resource consent application process it has not been possible to reach a formal agreement as to the undertaking of specific works and by whom. As such, while the on-site meeting was positive, it is necessary to provide evidence to further ensure the issues raised do not fall away and instead agreements / controls are put in place to ensure the necessary improvements to the access are undertaken and appropriate management practices are adopted.

6 Recommended Conditions

- 6.1 The evidence of Mr Tony Spowart has recommended that conditions are imposed to ensure specific improvements to the access are undertaken and that an appropriate management plan is developed.
- 6.2 In consideration of this, and based on the recommendations of the processing planner, Ms Emma Chapman, it is suggested that if the Commissioner is of the mind to grant resource consent then the following conditions are imposed:

Access

19. *Prior to the commencement of any activities authorised by this resource consent, the existing Road Metals Yaldhurst Quarry vehicle access on to West Coast Road (State Highway 73) shall be upgraded as follows:*

- *Quadrant kerbs/headwall protection shall be installed on the access at the culvert to prevent damage to the edge of seal at exit point;*
- *The shoulder shall be strengthened and raised immediately adjacent to the water race for 50m. This shall include the installation of kerb and channelling to maximise the available width of the acceleration lane and also make sweeping/maintenance easier;*
- *The east bound shoulder of the access shall be remarked as an acceleration lane (rather than current shoulder bars; and*
- *The remaining unsealed shoulder of the access shall be fully constructed and sealed to allow for an acceleration lane for west bound right turning trucks exiting the quarry.*

20. *Within three months of the granting of resource consent the consent holder shall submit, for the approval of Council, a management plan for the minimisation of material being dropped onto or tracked on to State Highway 73 from the application site. The management plan shall be broadly in keeping with the draft plan submitted as part of the evidence of Mr Andrew*

Metherell but shall also include a structure for reporting any issues/complaints and provision for judders bars / rumble strip or similar device if deemed necessary. As part of the submission of the management plan to Council the consent holder shall submit written evidence of consultation with the NZ Transport Agency which demonstrates their input was sought as part of the preparation of the plan.

21. Vehicular access to the RM4 site shall be via the haul road only, with no access from Buchanans Road.

7 Summary

- 7.1 The NZTA has submitted in opposition to the resource consent application by Road Metals Company Ltd to expand an existing quarry. The reason for the submission was to ensure that the vehicle access to the site is appropriately formed and maintained including the avoidance of the deposition of material on to the State Highway.
- 7.2 My evidence considers that the State Highway, and the effects on it, can be considered as part of the assessment of the proposal and, in combination with the evidence of Mr Spowart, identifies that minor improvements to the access, can be made and that, together with the incorporation of a management plan, these will suitably address the concerns of the Agency.
- 7.3 To this end conditions are recommended that would ensure the concerns of the Agency are addressed.

Stewart Fletcher

21 March 2018