

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

**REBUTTAL EVIDENCE OF BRUCE DAWSON ON BEHALF OF
FULTON HOGAN LIMITED**

SEPARATION DISTANCES

DATED: 21 OCTOBER 2019

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Introduction

1. My name is Bruce Edgar Dawson. I hold the position of Principal Environmental Consultant at Golder Associates Pty Ltd (Australia) (Golder) an environmental and engineering consultancy firm. I am located in Golder's Melbourne, Victoria, office and have been employed by Golder since November 2010.
2. My area of expertise for this hearing is application of the Victorian Environment Protection Authority Guidelines "Recommended separation distances for industrial residual air emissions" (dated March 2013). I refer to these as the EPA Victoria Guidelines or just Guidelines.
3. I have previously provided a written brief of evidence in relation to the Roydon Quarry Proposal. That evidence is dated 23 September 2019. I confirm my qualifications and experience as set out in paragraphs 5, 6 and 7 of that evidence.
4. I also confirm I have read and agree to comply with those parts of the Environment Court Practice Note that bear on my role as an expert witness, in accordance with paragraph 8 of my earlier evidence.

Scope

5. In my rebuttal evidence I address the evidence of the following witnesses:
 - (a) New Zealand Motor Caravan Association Inc. – Lara Stace, Paragraph 877
 - (b) New Zealand Motor Caravan Association Inc. – Richard Jackett, Paragraph 117
 - (c) Templeton Residents Association – Gemma Conlon, Paragraph 38
 - (d) Templeton Residents Association – Michael James Smith, Paragraph 13
6. I will also identify matters not discussed in my primary evidence but which are raised by other witnesses and with which I agree.

Appropriate separation distances

7. In the evidence of each of the four witnesses identified in Paragraph 5, recommendations are made regarding setback or separation distances for fixed and mobile processing plant from the boundary of the proposed quarry.
8. All four witnesses state that mobile and fixed plant should be separated from the boundary of the site by at least 500 metres.
9. The EPA Victoria Guidelines as described in my evidence provide the following recommended separation distances for quarrying, crushing, screening, stockpiling and conveying of rock:
 - (a) Without blasting, 250 metres;
 - (b) With blasting, 500 metres; and
 - (c) With respirable crystalline silica, 500 metres
10. As the setbacks identified by the witnesses appear to have been derived from the EPA Victoria Guidelines I make the following comments:
 - (a) The EPA Victoria Guidelines clearly state that a variation from the recommended separation distance is possible and should be considered, where required, in a site-specific risk assessment. The Guidelines describe what matters should be taken into account when considering a site-specific risk assessment
 - (b) The recommended separation distances in the EPA Victoria Guidelines are not intended to be applied to as a strict requirement but rather are triggers for further assessment if required. Where the recommended separation distance is not met it triggers the need for additional assessment regarding the adequacy of the actual separation on a case by case basis.
 - (c) The information provided in Appendix D of the *Resource Consent Application to Establish 'Roydon Quarry', Templeton* (Golder Ref 1781870-R-001-Rev0) (Appendix D), dated November 2018, the s92 response provided in March 2019 and the evidence provided by Mr Roger Cudmore regarding air quality issues provide information on dust management proposed to be incorporated into the proposed quarry.

- (d) The criteria described in the EPA Victoria Guidelines for consideration of a site-specific variation to a recommended separation distance have been appropriately considered in Appendix D of the application, the s92 response provided in March 2019 and the evidence of Mr Roger Cudmore. This information should form the primary basis of assessment of the suitability of the proposed separation between mobile and fixed plant rather than the default separation distances in the EPA Victoria Guidelines.

Bruce Edgar Dawson
21 October 2019