

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

JOINT WITNESS STATEMENT OF

JON FARREN, JEREMY TREVATHAN, STEPHEN CHILES, MICHAEL SMITH AND RICHARD JACKETT

NOISE

DATED: 6 NOVEMBER 2019

Introduction

1. This Joint Witness Statement (**JWS**):
 - (a) Relates to the noise effects that may arise from Fulton Hogan Limited's proposal to establish, maintain and close the Roydon Quarry; and
 - (b) Reports of the outcomes of expert conferencing between the five experts¹ who have filed evidence in this matter.
2. The expert conference was held on Wednesday 6 November 2019, at the Christchurch office of Golder Associates. John Hardie facilitated the conference.
3. The experts involved have read Appendix 3 of the Environment Court Practice Note and confirm compliance with it.
4. All references to conditions in this JWS are to the land use consent conditions attached to Kevin Bligh's Evidence in Chief dated 23 September 2019.
5. Numbers in square brackets in this JWS relate to paragraphs in the respective experts' evidence. Mr Farren has prepared three statements of evidence: Evidence in Chief (EIC) dated 23 September 2019, Rebuttal 21 October 2019, and Supplementary Rebuttal 30 October 2019. The remaining experts have only prepared one statement of evidence: Dr Trevathan 2 September 2019, and Dr Chiles, Mr Smith and Mr Jackett 14 October 2019.

Areas of agreement

6. We agree the on-site noise limits and times of application set out in conditions 43 and 44 are appropriate to protect health and provide a reasonable standard of amenity.
7. We agree that construction noise and vibration effects will be appropriately managed by conditions 10, 13, and 45.

¹ Jeremy Trevathan (section 42A officer for Selwyn District Council); Jon Farren (witness for Fulton Hogan Ltd); Stephen Chiles (witness for Canterbury District Health Board); Michael Smith (witness for Templeton Residents' Association); and Richard Jackett (witness for the New Zealand Motor Caravan Association)

8. We agree that the approach to noise modelling set out by Mr Farren in his evidence is consistent with industry practice. This modelling includes an appropriate approach to meteorological effects on noise propagation, allowing for downwind conditions or temperature inversions.
9. Mr Jackett [54-64] expressed concern regarding special audible characteristics of processing plant. As a result of conferencing and a site visit on 6 November 2019, Mr Jackett agrees with the other experts that there will be no special audible characteristics at receiver locations which would require an adjustment under NZS 6802:2008.
10. With respect to the concern raised in paragraphs 74-75 of Mr Jackett's evidence, we agree that realistic operating scenarios should comply with the project noise limits.
11. We agree that the restriction on activities provided in Condition 19 is appropriate. We agree that on-site activities between 2000-0600h as set out in Table 1 would have acceptable noise effects.
12. We agree that it is appropriate for all heavy vehicles travelling to and from the quarry between 2000-0600h to only access the site via SH1 at Dawsons Road, as required by Condition 22. Heavy vehicle movements between 0600-2000h are discussed below.
13. We agree that the noise management plan required by Condition 47, including noise monitoring, is appropriate.

Areas of disagreement

Tonal alarms on site

14. Dr Chiles [20-23], Mr Smith [17-20], Dr Trevathan [47] and Mr Jackett [118] agree that tonal alarms should not be used on the site, and that Condition 46 should be amended to reflect that outcome. Mr Farren [7-11 rebuttal] understands that such controls are impractical.

Management plans

15. Mr Smith [25-31] and Dr Chiles agree that Condition 79 a) should be amended to explicitly allow the CLG to comment on drafts of the noise management plan. Mr Farren, Dr Trevathan and Mr Jackett do not consider this necessary as they believe the CLG will operate to give an effective means of community input into the quarry operations.

Mobile processing plant

16. Mr Smith [13] considers that mobile plant should only be used within the central processing area, and Mr Jackett [117] considers that the setback for mobile processing plant in Condition 31 should be increased from 250m to 500m (i.e. within the central processing area). Mr Farren [19 rebuttal], Dr Chiles and Dr Trevathan do not consider this necessary as noise limits and / or the noise management plan provide adequate controls.

Off-site trucks

17. Dr Chiles, Dr Trevathan [51], Mr Smith and Mr Jackett [89] consider that Condition 22 should be amended to restrict movements between 2000-0700h rather than 2000-0600h. This aligns with Conditions 19, 21 and 43. Mr Farren disagrees [61-70 EIC].
18. We agree that a few infrequent truck movements on local roads between 0700-2000h should have acceptable noise effects.
 - (a) Mr Farren considers that controls on truck numbers and/or routes are not required based on the projected distribution of trucks set out in the Integrated Transport Assessment.
 - (b) Dr Chiles, Dr Trevathan, Mr Smith and Mr Jackett consider the traffic evidence provides indicative values and does not preclude peaks with higher truck movements on local roads. Dr Chiles [25-29] suggested restricting all truck movement to state highway access. Dr Trevathan [89] suggested restricting movements on Curraghs Road and Jones Road in Condition 38. Dr Chiles, Dr Trevathan, Mr Smith and Mr Jackett agree there may be other ways to robustly limit the number of truck movements on local roads.
19. Dr Chiles [31] and Dr Trevathan [102] recommend implementation of road design features to minimise noise effects of heavy vehicles between the site and SH1. Mr Smith [24] agrees and also recommends the intersection layout should discourage heavy vehicles condition continuing east on Jones Road. Mr Farren does not consider these controls to be necessary. Mr Jackett does not consider this affects the NZMCA site.

20. We agree that engine braking can cause increased noise disturbance from trucks. Dr Chiles [32-33], Dr Trevathan, Mr Jackett and Mr Smith believe that trucks capable of engine braking should be prohibited on site. Mr Farren [17 rebuttal] believes that effects can be managed through a code of practice.



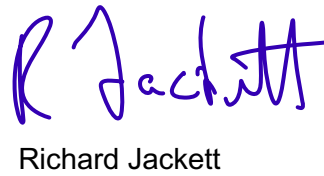
Jon Farren



Michael Smith



Stephen Chiles



Richard Jackett



Jeremy Trevathan

6 November 2019