

28 March 2019



Lands and Survey (South) Limited  
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Dear Simon

## **Request for Further Information**

**Response required by:** 18 April 2019

**Record Number/s:** CRC193563, CRC193564, CRC193772, CRC192773

**Applicant Name:** SOL Quarries Limited

**Activity Description:** To discharge contaminants to air; to use the land for quarry activities; to divert water; and to discharge contaminants to land where they may enter water.

## **Overview**

As you are aware, Rubie McLintock has been processing the above resource consent applications. To progress your application and to fully understand any potential effects from the proposal, further information is required under Section 92 of the Resource Management Act 1991 (RMA).

Options available to you are detailed below under **Response options**. Please complete one of these options by **18 April 2019**. Without this further information, your application may have to be notified or declined.

Notification means that potentially affected parties and/or the general public are given the opportunity to raise their concerns or support for your proposal. Notification does not guarantee your application will be granted – there is the possibility it could be declined. For more information about notification, please go to <https://ecan.govt.nz/do-it-online/resource-consents/notifications-and-submissions/>.

## **Information requested**

The following information is required to fully understand your proposal.

### **A. Potential for Soil Contamination**

The Application states that the site is not considered to be a contaminated site. However, the Canterbury Regional Council (CRC) Contaminated Sites team have expressed concerns regarding the potential for on-site soil contamination as the latest aerial imagery shows soil disturbance in two areas on site and a workshop in the centre of the proposed extension:

1. Please provide a Preliminary Site Investigation (PSI) completed by a Suitably Qualified Environmental Practitioner.
2. Please also confirm in the PSI what herbicide and/or pesticide sprays have been used on the ready-lawn site.

### **B. Potential Effect on Surface Water Quality and Aquatic Ecosystems**

Paparua Water Race has been operational for approximately 130 years and it is likely that it has some aquatic life established in it. Therefore, please provide the following:

1. Please provide a description of the current state of the water race, including a description of any aquatic life present in it.
2. Based on the current state of the water race, please provide an assessment of the potential effects of:
  - a. The re-alignment on surface water quality and aquatic ecosystems, including a description of any mitigation measures proposed during the re-alignment; and
  - b. The discharge of dust to surface water quality and aquatic ecosystems.

### **C. Potential Effect on Groundwater Users**

Based on Canterbury Regional Council GIS, there are wells used for domestic purposes within 1,000 metres downgradient of the site.

1. Please provide an assessment of the potential effects of the deposition of cleanfill on domestic bores within 1000-metres downgradient of the site, including any monitoring and mitigation measures that address the potential for adverse effects on these bores.

### **D. Groundwater Level and Quality Monitoring**

The Applicant intends to use a groundwater monitoring programme similar to the programme required for the existing quarry, resource consent CRC184073. In addition, the Applicant proposes to use a fourth bore (BX23/0871) for water quality monitoring. However, this well is located within the proposed quarry area rather than being down-gradient.

1. Please provide further information relating to where a new down-gradient bore will be installed for groundwater monitoring purposes if bore BX23/0871 cannot be used as the quarry stages progress eastwards.

### **E. Potential Effect on Air Quality**

Information has been provided seeking to clarify the air quality impacts on the site at 113 Conservators Road, Yaldhurst. This has been reviewed by the Air Quality Expert and it is considered to further information is required to understand this.

1. Please provide a more detailed assessment of the potential exposure of the residence at 113 Conservators Road, Yaldhurst to potential dust events from the proposed quarry activity. This assessment should include consideration of any additional mitigation measures to address potential impacts, particularly when quarry operations come within 250 metres of that residence.

## **F. Water for Dust Control**

The main mitigation measure for the proposed quarry is proposed to be the application of water to suppress dust. Therefore, ensuring that there is sufficient water available for this purpose is important. The air quality assessment calculates that 27m<sup>3</sup> of water will be required per hour during peak dry conditions.

It is noted by our Air Quality Scientist, during prolonged dry weather, the application of water could reasonably be expected to occur for all hours of operation and for several consecutive days in a row. Given this, hourly water consumption and an 11-hour operating day, a peak daily water consumption of approximately 300m<sup>3</sup> would be required. This is in excess of the site's water take (100m<sup>3</sup>) and available storage (100m<sup>3</sup>).

Our Air Quality Scientist agrees that applying one litre of water per square metre of exposed surfaces per hour is conservative. Irrespective of this, the air quality assessment should assess the effectiveness of dust suppression in light of the limited volume of water available on a daily basis.

1. Based on the above, please clarify what is considered to be a more reasonable water application and provide an updated assessment regarding the use of water for dust suppression. In this consideration, please include water that will be consumed during operation of the processing plant and for the irrigation of the bunds, if required, in order to establish and maintain grass growth needed to minimise dust emissions from the bund.
2. In regard to the surface area that will require dust suppression, please provide clarification on the following matters:
  - a. The length of the main haul road is stated to approximately 1,700 metres. However, based on Google Maps, it may be larger than this even when allowing for a 250-metre sealed section.
  - b. The width of the haul road is assumed to be four metres wide. However, it is considered this is reasonably narrow and would not necessarily allow for the safe passing of trucks.
  - c. An active quarry area of 2 hectares is assumed in the calculations and this seems reasonable. However, for the purpose of calculating water consumption, it may be overly conservative in order to account for frequently trafficked areas and stockpiles.
3. Based on the above clarifications and the potential lack of water for dust suppression, please provide a revised assessment of effects of dust discharges from:
  - a. An unmitigated processing plant and vehicles travelling along haul roads, which will generate dust regardless of wind speed; or

- b. A revised methodology on how air quality effects from an unmitigated processing plant and vehicles travelling along haul roads can be avoided, remedied or mitigated.

### **G. Proposed Air Quality Monitoring**

The Air Quality Assessment indicates that monthly PM<sup>10</sup> and Total Suspended Particulate (TSP) monitoring will be undertaken on the northeast boundary of the site to demonstrate the effectiveness of the control and mitigation measures. It is stated that detail of this is provided within the 'Draft Dust Management Plan'. However, no details of this have been provided. Please provide:

1. A description of the monitoring programme that will be used on site. This should take into account the Canterbury Regional Council's current monitoring requirements for gravel quarries within the Christchurch area operating near to residences.
2. Justification as to why it is considered that the proposed monitoring frequency of one month is appropriate.

### **H. Complaints Assessment**

Within the Air Quality Assessment, a small summary is provided regarding the 31 complaints received by the Applicant in relation to the existing operation. It is also noted that improvements relating to dust control at the site entrance and haul road have been made.

1. Please provide a detailed assessment of the complaints, including:
  - a. The date and time of the receipt of the complaint and the person who made the complaint;
  - b. The nature of the complaints; and
  - c. How the complaints have been addressed/resolved.

### **I. Potential Effect on Tangata Whenua Values**

No assessment of the potential effect on Tangata Whenua values or an assessment of the relevant Iwi Management Plan has been provided.:

1. Please provide an assessment on the potential effect on Tangata Whenua values; and
2. Please provide an assessment on the relevant objectives and policies of the relevant Iwi Management Plan.

### **J. Future Land-Uses**

No information has been provided regarding the future land-use of the site and whether this will be suitable following quarrying and cleanfilling activities.

1. Please provide a description of the likely future land-uses of the site.

### **K. Points of Clarification**

Please provide information on the following points:

1. Please provide a plan identifying the existing and proposed shelterbelts that will be established and maintained and controlled by the Applicant.
2. A description of the mitigation measures for minimising dust should overburden removal and bund formation need to occur outside of winter months when ground conditions are dry.
3. Confirmation that the total aggregate processing to occur on site is 600 tonnes per hour.

### **Response options**

The options available to you are set in Section 92A(1) of the RMA. You must choose one of the following options.

**A. Supply the requested information** by 19 April 2019.

If the information can be easily collated and supplied by this date, please provide it in writing.

**B. Agree in a written notice** by 19 April 2019 to supply the information requested.

Sometimes technical information will take some time to collate, or key contacts may not be immediately available. If you need a longer period of time to supply the requested information, please contact Rubie McLintock to advise when you can provide the information. You can do this via email or letter.

**C. Refuse in a written notice** by 19 April 2019 to supply the requested information.

If you chose Option C, Section 95C of the RMA requires us to publicly notify your application. If you receive submissions on your application, then you can expect to go through a resource consent hearing process. The charges fact sheet at this link indicates likely costs for a resource consent hearing: <https://ecan.govt.nz/do-it-online/resource-consents/first-steps-and-costs/>. You should be aware that your application could be declined through this process.

If you chose not to respond to this letter, then the process for Option C applies.

If you would like to discuss this request in more detail, please don't hesitate to contact Rubie at [rubie.mclintock@ecan.govt.nz](mailto:rubie.mclintock@ecan.govt.nz) or 033677276.

Yours sincerely,



Nick Reuther  
*Senior Consents Planner*

cc:

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