

**From:** [REDACTED]  
**To:** [Hearings](#)  
**Cc:** [submissions@golder.co.nz](mailto:submissions@golder.co.nz)  
**Subject:** Notifications Consent Submission: Group 422  
**Date:** Thursday, 6 June 2019 4:45:17 PM  
**Attachments:** [Christine-Fox-Submission-to-Royden-Quarry-Resource-Consent-Application.docx](#)

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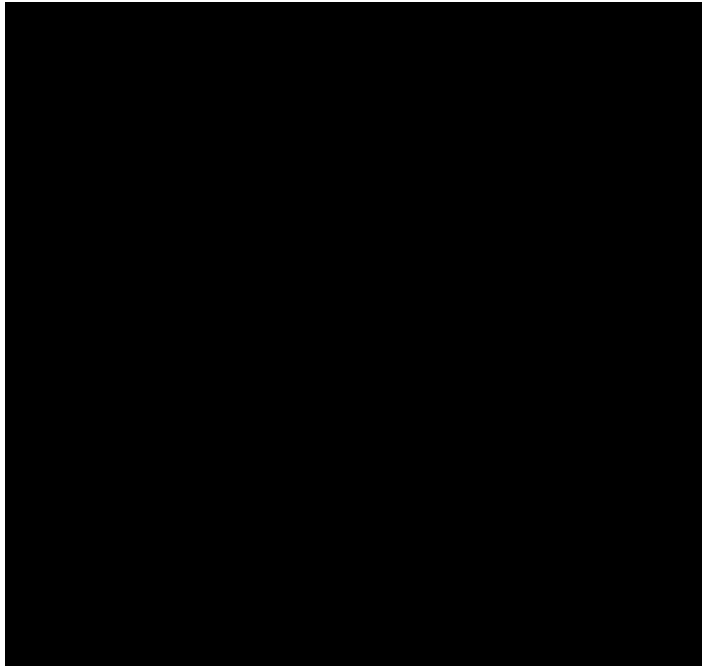
**Group ID: 422**

**Consent name:** Fulton Hogan - Roydon Quarry

**Consent number:** CRC192408, CRC192409, CRC192410, CRC192411, CRC192412, CRC192413, CRC192414, RC185627

**Name:** Christine Fox

**Care of:**



**Contact by email:** No

**Is a trade competitor:** No

**Directly affected:** Yes

**Consent support/hearing details**

- CRC192408: oppose | WANT to be heard | WILL consider a joint hearing
  - CRC192409: oppose | WANT to be heard | will NOT consider joint hearing
  - CRC192410: oppose | WANT to be heard | will NOT consider joint hearing
  - CRC192411: oppose | WANT to be heard | WILL consider a joint hearing
  - CRC192412: oppose | WANT to be heard | WILL consider a joint hearing
  - CRC192413: oppose | WANT to be heard | WILL consider a joint hearing
  - CRC192414: oppose | WANT to be heard | WILL consider a joint hearing
  - RC185627: oppose | WANT to be heard | WILL consider a joint hearing
-

**Reasons comment:**

I wish to object to all the resource consent applications made by Fulton Hogan for the proposed Roydon Quarry. I make this objection as an affected resident living within 250m of the proposed site. I want to make it clear to the Commissioners that I am in no way adverse to development in the region, nor do I fail recognise the need for quarries in post-quake Canterbury. However I believe that it is imperative that the Christchurch rebuild does not come at the cost of the degradation of the quality of life in the surrounding areas, that the development of Greater Christchurch is not forever marred by poor planning, and that the cost savings for profit driven corporates does not come at the considerable loss for residents in areas such as Templeton. I am concerned that Fulton Hogan continue to voice the reason for the quarry's location as a cost saving exercise due to its proximity to Christchurch. The rhetoric the company has since used about being 'good neighbours', and 'using a range of mitigation measures', fail to hide the fact that this profit-driven venture will remain that way, regardless of the impact on the surrounding environment and community. I believe that Fulton Hogan are exploiting out of date district plans and resource management legislation widely recognised as lacking in its protections against such activities. For Commissioners to grant this application, knowing full well that the Government is looking at legislating mandatory buffer zones of 500m between quarries and residential dwellings, and that both Christchurch City Council and Selwyn District Council are not in favour of such quarry activities so close to dwellings, would be an abhorrent abuse of decision-making authority.

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**Consent comment:**

To decline all applications, and future applications for resource consent to establish a quarry at the Dawsons Road site.

# Submission to Fulton Hogan Ltd – Proposed Royden Quarry

## Introduction

I wish to object to all the resource consent applications made by Fulton Hogan for the proposed Roydon Quarry. I make this objection as an affected resident living within 250m of the proposed site.

I support and endorse the Templeton Resident's Association submission in opposition to the resource consent applications.

I wish to speak to my submission at the hearing.

I moved to this area 19 years ago from central Christchurch, attracted by the rural landscape; fresh, unpolluted air; and the peace and tranquillity off country living. With the Canterbury Earthquakes in 2010 and 2011, and the subsequent rapid development of Rolleston, the IZONE Industrial area and West Melton, the increased traffic in the area has considerably diminished the quietness of the area. Maddisons Road, which 19 years ago was not eligible for a marked centre line due to be too narrow, has now become a major thoroughfare for commuters from north-east Christchurch to the IZONE industrial zone, and an alternative to State Highway One for those travelling to and from Christchurch.

Based on Statistics New Zealand's population medium projections, the Selwyn District is projected to increase by 113% in the next 30 years, while Christchurch City's increase over the same period is only 28%. This suburban swell is, and will continue to put development pressures on communities like Templeton and West Melton. Further, the dramatic increase in traffic movements, on roads not designed with this growth in mind, in and of itself is concerning for current residents. This application for resource consent by Fulton Hogan exponentially increases these concerns, exacerbating the stresses of rapid development with its proposed activities. The details of attempts to mitigate negative effects of the proposed quarry do little to allay these concerns for myself and other residents.

I object to this application on the following grounds:

- Exacerbation of transport issues
- Ground water contamination
- Dust pollution
- Noise pollution
- Adverse health effects
- Negative effects of ongoing vibration
- Degradation to the landscape and visual amenity
- Failure of site rehabilitation
- The lack of compliance with existing resource compliance
- The negative effects on future development in the area.
- The cumulative negative effects
- Future negative environmental, cultural and community effects

As an immediate neighbour to the proposed quarry, the applicants have attempted to sooth my concerns with claims that the individual negative effects of their activities will be minor. Their application details that I may experience a minor increase in traffic volumes; the increase in noise in the immediate area, although almost constant, will be comparatively minor; there may be a minor increase in the amount of silica dust particles in the air, and any health implications will subsequently be minor; there may be minor disruption to the rural landscape; any impact on the ground water quality will be minor; any vibrations felt will apparently also be minor, and work will be undertaken to mitigate all of these effects.

I would argue firstly that 'minor' is a comparative term and in these circumstances completely dismisses the previously inherent values of the area. Residents of this area, myself included, chose this location to live because of the almost total absence of the negative impacts Fulton Hogan's activities will bring. In this instance, a minor increase in these negative impacts is exponential. It is simple maths – one is a whole lot more than zero. Further, these so-called minor negative effects are cumulative – the term "death by a thousand cuts" springs to mind. In this case however, should the proposed quarry development proceed, it will be 40 years of a thousand cuts without reprieve. While Fulton Hogan's application promises to mitigate these negative effects, even if taken in good faith, mitigation is not elimination and the residents of the area and the immediate environment will inevitably suffer as a result.

To address some of my concerns directly:

### **Traffic Movements**

The Rolleston IZONE industrial area encompasses 188 hectares, with only a small percentage of this having been developed. Even taking into consideration the completion of the State Highway One upgrade, the use of Maddisons Road as an primary collector road, and State Highway alternative, will continue to stretch safety levels for light traffic, even without the increases of heavy traffic the proposed quarry will bring. Fulton Hogan's assertion that the "use of local roads will be limited to a comparatively small proportion of traffic" fails to consider the impact for residents and road users of the size, noise and weight of these vehicles on what are essentially small, narrow rural roads already suffering from edge break (11. Heavy Traffic Volume Forecast – Appendix C Transport Assessment).

While modifications are proposed to Dawsons/Jones Road, the assessment states that "other Council roads in the area will only have low volumes of increased heavy traffic usage ... Modifications are not proposed or considered necessary to mitigate the effects of additional heavy traffic" (Executive Summary – Appendix C Transport Assessment). I am not satisfied that this impact assessment of the quarry traffic travelling on Dawsons Road, Maddisons Road and other surrounding roads has been accurately assessed, and I have no confidence in the company's assurances of expected routes and estimates of maximum daily traffic. If, once consent was granted, local authorities had a mechanism to enforce these claims of traffic routes and numbers of movements, but, as Fulton Hogan well knows, there is no mechanism for this, and as a result I have no faith in these hollow assurances.

Fulton Hogan have given personal verbal confirmation that 10% of the Royden Quarry trucks will travel west on Dawsons Road to Maddisons Road. This equates to 150 heavy vehicles per day. Fulton Hogen's Transport Assessment recognises the poor safety record of the Jones Road / Dawsons Road intersection, but fails to account for the accident-prone Dawsons Road / Maddisons Road intersection which is immediately adjacent. Adding 150 heavy vehicle crossings to this intersection and then dismissing the harmful impacts of the quarry on this intersection is not only negligent, it is potentially fatal. This further diminishes my faith in Fulton Hogan's efforts to mitigate the negative impacts of their activities.

### **Property Values**

One of the cases put forward by Fulton Hogan for the selection of the proposed site is that it has few neighbours. This statement completely dismisses the negative impacts on the current neighbours. The processing of such a large amount of aggregate on site will have considerable negative impacts on surrounding residents, to the point where this desirable, and valuable lifestyle community will become instantly unattractive to potential developers or future buyers of current properties – something the applicants will not, and cannot mitigate.

### **Processing of Additional Aggregate**

The applicants have stated that "from time to time" material sourced from elsewhere will be brought to site and stockpiled and/or processed there. The evasive nature of Fulton Hogan's responses to questions around the transporting and processing of this additional aggregate concerns me greatly. The original location of this aggregate will determine the transport routes to Royden Quarry and will likely be outside the traffic assessment presented by the applicants. This will further increase the heavy vehicle movements on the rural roads in the area, most of which are too narrow to allow for the 9m recommended turning point.

There is nothing in this application to mitigate the impact of this additional traffic, and no way to restrict the movements of these vehicles once the quarry is operational. The reality is that in spite of the best laid plans, and the applicant's desire to present the most appealing case to Commissioners, once consent is granted this quarry will be a profit-making enterprise. The shortest possible route, the most cost-efficient means, will quickly win out over any purported desire to be a good neighbour and minimise the negative impacts of the activities.

### **Noise Pollution and Vibration – Proposed Hours of Operation**

The application under consideration covers itself by proposing 24 hours a day, 6 days a week of operation. There may be a period of 150 days where they might not work between 6pm and 10pm but I question how this will be monitored, what enforcement options are available to local authorities, and how local residents will seek redress. The almost constant noise pollution caused by these hours of operation cannot, and should not be underestimated. Noise pollution can be subjective, and in many instances tolerated, for example, an early rising neighbour choosing to mow lawns early on a Saturday morning, a student flat throwing the odd

party on a weekend, or even a bored and unattended dog barking most of the day. These noises still have an end date, and in most instances, the opportunity for those effected to call on regulatory enforcement.

If this quarry proceeds, affected residents will be subjected to the increase in noise pollution every single hour of operation for the foreseeable future, with no course for redress. In comparison to the aforementioned incidental sounds, consider the noise and vibrations of 1500 traffic movements daily, the bangs from impacts, excavation and tipping, engines revving, reversing alerts, chassis rattling, and these all combined with the sounds of the crushers and processing plants. Then consider the impact of this noise pollution occurring 24 hours a day in a previously quiet, rural community, for forty years. It is unfathomable that this increase in noise be considered minor. As with the issues involving traffic movements, I do not believe that Fulton Hogan's application appropriately addresses the scale and consistency of the negative effects of their activities and see no reason why consent for their activities should be granted.

## **Dust**

One of my biggest concerns with the proposed quarry is the dust inevitably generated. While Fulton Hogan have attempt to minimise the impact dust will have on the surrounding area, neighbours of currently operational quarries can testify to the contrary. Not only will the dust coat our homes and windows, our cars, gardens and washing, it also poses health risks. Airborne crystalline silica is well known to trigger pulmonary issues and cause silicosis. As the Canterbury Medical Officer of Health states in reference to nuisance dust levels, "we know it can cause irritation and symptoms of concern" (6.4.3, Potential health effects - Application Assessment of Environmental Effects Report). And yet Fulton Hogan believes that "by having a suitable separation distance, dust emissions can be dispersed, diluted and deposited to such an extent that their effects at sensitive locations should be minimised to an acceptable level" (Appendix D – Air Quality Assessment, 5.1.2).

The Air Quality Assessment references the buffer guidelines for separation distances for industrial residual air emissions, published by the Environment Protection Authority Victoria (EPA Victoria) in 2013, extensively used in New Zealand. EPA Victoria recommends a separation distance from quarries (without the use of blasting) to sensitive activities of 250m. However, the applicant's assessment states that the greatest intensity of dust emissions will be typically within 100m of the source and "accordingly, applying a 250 m separation distance is expected to be conservative for routine dust emissions from aggregate extraction activities, provided that good practices for dust mitigation are in place and are generally effective." (Appendix D – Air Quality Assessment, 5.1.2).

EPA Victoria also includes a separation distance of 500m where quarrying is undertaken for aggregate containing crystalline silica. Yet the applicants dismiss this separation distance as not justified due to a single monitoring study undertaken at the Yaldhurst Quarry which identified that the respirable crystalline silica (RCS) concentrations were very low. Section 4.2.3 of the Air Quality Assessment states that from this study of the Yaldhurst Quarry "it can be concluded that the annual average

concentration for RCS would be below the OEHHA guideline". The report continues to attempt to make its point by saying that "this was reflected in an ECan media release that quoted the CDHB Medical Officer of Health stating the following: 'Overall, the results show there is no serious public health risk to Yaldhurst residents from airborne dust.'" (I don't believe I am wrong to question the quality and authority of an Air Quality Assessment which quotes media releases as evidence, and not the medical professional themselves.)

It is based on this single study, and not the work of the widely used and accepted EPA Victoria guidelines, that Fulton Hogan believe the impacts of dust to neighbouring residents to be minimal. I would like to point out that an annual average concentration of RCS is just that, an annual average, and by its very definition does not preclude, but includes raised levels of RCS concentrations. These heightened RCS concentrations are not the equivalent to an increase in rainfall, or an increase in daily temperature, they are periods of heightened exposure to harmful dust particles, which, but for Fulton Hogan's proposed activities, residents would not be exposed to on a regular basis for a period of up to 40 years. Further, the quoted media release, the CDHB Medical Officer of Health states there is "no **serious** public health risk", if there was **no** risk this would have been stated. Not to labour the obvious point, but Medical Officer of Health also says nothing of the risk to Templeton residents from the Royden Quarry, no such assessment has been done. Must we wait to be exposed to this risk before our health is considered important?

It is grossly incompetent and reckless that Fulton Hogan disregards the guidelines of a 500m buffer recommended by EPA Victoria and cherry picks favourable results to suit its own business case. There are 28 residential dwellings, a Buddhist temple and six commercial properties within 500m of the proposed quarry boundary, 15 of these properties are located within 250m of the boundary. The health of the residents and workers at these properties is being completely disregarded by the applicant in the name of profit. The purported mitigation efforts of Fulton Hogan fall woefully short of ensuring residents are exposed to no harmful dust. To quote MP Amy Adams: "our experience has been that despite all of the reassurances and promises of the consent conditions, the actual experience is that dust is not generally well controlled... Given the history with quarrying and the very real effect it has had on residents with breathing issues, health issues, with nuisance, it is a significant issue for residents and I can understand why they would be concerned."

In response to our concerns, and those of other communities in the region effected by quarry activities, the Canterbury Regeneration Minister, Megan Woods announced in 2018 she was considering a legislative amendment to ensure a mandatory buffer zone of at least 500 meters between quarries and houses. ECan Chief Executive Bill Bayfield also stated that given the lack of New Zealand-specific guidelines, the Government might consider the value of guidelines for RSC and a national environmental standard for separation distances between residential property and quarries. As residents we may be able to simply reswash sheets covered in quarry dust, and might grudgingly increase the frequency of window washing, but the potential damage to our health will be irreparable and unforgivable.

Given the Government's consideration of legislative change, and the recognition that both the RMA and district plans are presently incompetent tools for preventing the harmful effects of such quarrying activities, the only course of action acceptable is for Commissions to reject the application for consent.

### **Groundwater**

I am also concerned about the sustainability of the existing neighbouring wells, the amount of water required for dust suppression and the effect of the changing groundwater levels due to gravel extraction. Apparently, the applicants are entirely unconcerned, and as such, have dedicated less than 3 pages to its consideration of groundwater contamination and sustainability. Fulton Hogan are proposing a separation distance of 1m between the quarry pit floor and the "expected maximum seasonal high groundwater levels", and as a result, they conclude that "any adverse effects on groundwater quality from the extraction activities themselves are considered to be less than minor" (Application Assessment if Environmental Effects Report, 6.2.3.1). A one metre separation buffer certainly doesn't allow much room for error when considering the potential contamination of our most precious resource, especially given the notoriously changeable nature of groundwater levels.

### **Consent Conditions**

If common sense, and the need to protect our community's wellbeing and the local environment does not prevail, and Fulton Hogan are granted consent for the Royden Quarry, it is essential that both Environment Canterbury and Selwyn District Council place strict conditions on activities and a robust monitoring programme is put in place for the quarry. At an absolute minimum these conditions must include:

- A maximum set back distance of 500m from any part of the quarry boundary to any residential boundary;
- Where the applicant is looking to use a mobile processing plant, fixed points must be stipulated, and the 500m set back distance must apply. These fixed points must be measurable at all times;
- There must be no removal of aggregate or excavation within 3 metres of the highest recorded groundwater level;
- Local well and bore readings for water quality must be made available to independent assessors for verification.
- Stockpiles must be all be stored at a height lower than the lowest bund to ensure the integrity of amenity value.
- Should consent be granted, Fulton Hogan must be prohibited from applying for amendments to the consents for a period of 10 years.
- Most importantly, there must be independent, external audit processes established for the duration of the consents to ensure the applicant adheres to all consent conditions.

### **Conclusion**

I want to make it clear to the Commissioners that I am in no way adverse to development in the region, nor do I fail recognise the need for quarries in post-quake Canterbury. However I believe that it is imperative that the Christchurch rebuild does



not come at the cost of the degradation of the quality of life in the surrounding areas, that the development of Greater Christchurch is not forever marred by poor planning, and that the cost savings for profit driven corporates does not come at the considerable loss for residents in areas such as Templeton. I am concerned that Fulton Hogan continue to voice the reason for the quarry's location as a cost saving exercise due to its proximity to Christchurch. The rhetoric the company has since used about being 'good neighbours', and 'using a range of mitigation measures', fail to hide the fact that this profit-driven venture will remain that way, regardless of the impact on the surrounding environment and community. I believe that Fulton Hogan are exploiting out of date district plans and resource management legislation widely recognised as lacking in its protections against such activities. For Commissioners to grant this application, knowing full well that the Government is looking at legislating mandatory buffer zones of 500m between quarries and residential dwellings, and that both Christchurch City Council and Selwyn District Council are not in favour of such quarry activities so close to dwellings, would be an abhorrent abuse of decision-making authority.

I beg the Commissioners humbly to see that the profit driven exploitation of natural resources cannot, in this instance win out, over the health and well-being of a local communities.