CON520: SUBMISSION ON
RESOURCE CONSENT APPLICATION
(SECTION 96 RESOURCE MANAGEMENT ACT 1991)

TO: Consents Hearings
Environment Canterbury
P O Box 345
CHRISTCHURCH 8140

Email: hearings@ecan.govt.nz
Ph: (03) 353 9007 Fax: (03) 365 3194

OR: submit by completing an on-line form at:

Person(s) /Group/Organisation Making the Submission

Full Name of Submitter(s): Nancy Yada Gibb

Postal Address: 

Contact Phone: 

Fax/Email: 

Contact Person: as above

Name of applicant: Fulton Hogan Limited

Applications to Environment Canterbury

☑ All of the applications as listed below OR only those as ticked.

☑ CRC192408 Land use to excavate material
☑ CRC192409 Land use to deposit cleanfill
☑ CRC192410 Discharge contaminants into air
☑ CRC192411 Discharge contaminants into water from industrial processes
☑ CRC192412 Discharge stormwater into land
☑ CRC192413 Discharge contaminants into land associated with deposition of cleanfill
☑ CRC192414 Water permit

☑ I / We support the application ☑ I / We oppose the application ☐ I / We are neutral to the application (neither support or oppose)

☑ I / We do wish to be heard in support of my/our submission*
(Note: this means you wish to speak in support of your submission at the hearing)
*If others make a similar submission, I will consider presenting a joint case with them at the hearing ☐ Yes ☐ No

OR

☐ I / We do not wish to be heard in support of my/our submission
(Note: this means that you cannot speak at the hearing, however you will retain your right to appeal any decision to the Environment Court on any decision made by the Council.)
Application to Selwyn District Council

☑ RC185627 Land use for gravel extraction and processes

☐ I / We support the application ☐ I / We oppose the application ☐ I / We are neutral to the application (neither support or oppose)

☑ I / We do wish to be heard in support of my/our submission*
(Note: this means you wish to speak in support of your submission at the hearing)

*If others make a similar submission, I will consider presenting a joint case with them at the hearing ☐ Yes ☐ No

OR

☐ I / We do not wish to be heard in support of my/our submission
(Note: this means that you cannot speak at the hearing, however you will retain your right to appeal any decision to the Environment Court on any decision made by the Council.)

2. The reasons for making my submission are: (state in summary the nature of your submission, giving reasons)

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3. I wish the consent authority to make the following decision: (give details, including the general nature of any conditions sought)

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See Attached.
5. [ ] I/we am / am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991. I/we am / am not directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Signature of submitter or duly authorised agent on behalf of submitter

Date 6 / 6 / 19

Notes to the submitter:
1. The person making this submission must send a copy to the applicant as soon as reasonably practicable after serving Environment Canterbury
2. A list of all submissions received will be provided to the applicant.
3. Please be aware that third parties may request a copy of submissions received and that request is subject to the Local Government Official Information and Meetings Act 1987.

The address for service of the applicant is:
Fulton Hogan Limited
c/o Golder Associates
PO Box 2281
Christchurch 8041
Attn: Kevin Bligh / Geoff England

Email: submissions@golder.co.nz
SECTION TWO

I wish to object to all the Resource Consent Applications from FH for the proposed Roydon Quarry.

I make this objection as an affected resident living approximately 1 km of the proposed site. My husband and I, both retired, bought our home less than ten years ago. We were attracted by the semi-rural area with its plethora of visual attractions, parks, open spaces for walking our dog, recreation amenities and general enjoyment of external space, yet within reasonable proximity to the city. We grow most of our own vegetables. We enjoy the visits of wild birds to our backyard.

We are located right on the edge of the city boundary with only a large open paddock separating us from a distant line of trees; so we feel the full force of the winds. Our garden grows more slowly than those in more sheltered positions a street away. The Quarry will be even further away from the Quarry site boundaries than we are from the distant trees.

We shop mainly at Rolleston, our route being via Jones Road. We prefer not to join the ever increasing traffic on the SH. We dislike noisy city traffic and bustle including that in Hornby.

We are concerned for our health and that of our pets, our garden, and the insects which visit and help our garden to thrive. We are concerned for the general health and well-being of our community. We are concerned about visual impairment of our rural areas.

We are also very concerned regarding the value of our home, on which our retirement plans depend.

My main concerns are as follows:
1. Dust
2. Water
3. Roads & Transport.
4. Environmental effects.
5. Noise.

1. Dust.
Despite FH’s claims that there will be minimal dust particularly the smaller sized particles PM10 and PM2.5, I would point out that it does not need a great quantity of such small-sized dust to cause irredeemable health problems, particularly in babies, older people and those with asthma. Animals can also be affected. Homes will need to be kept closed up.

Any size dust creates a number of unpleasant living conditions. Apart from causing often serious respiratory problems (and this does not apply only to silica-rich particles), it coats furniture, the washing on the line, garden plants and vegetables. It coats the grass. Commercial vegetable growing will be affected. Animals which habitually crop the grass will be affected.

FH say they will monitor dust levels - but with their own monitors. Recently at another quarry (Yaldhurst) it was said that the quoted total dust levels were lower than actual because several of the monitors were not working at all and/or were covered with plastic.

It is well known that water alone is ineffective to suppress dust because the surface of the water is too hard to absorb dust particles. Combining water with chemical wetting agents/dust suppressants softens surface tension and are said to help. But that introduces foreign chemicals. It is curious that FH does not mention such chemicals except in passing (Section 6.4.2 in the Golder application).
FH say they are going to build on-site bunds from the discarded topsoil, etc - and may even need to bring in additional material from other sites, this creating hazards elsewhere as well. They have already planted a “shelter bed” of mostly natives which are slow-growing and are unlikely to provide visual or physical distraction for about 10 years. The bunds are to be seeded with quick-growing grass, and watered. But they will feel the full force of all the strong winds we experience in the Selwyn district. Dust and also topsoil will be blown off onto roads, particularly Jones Rd., the new bicycle track, and even the new Highway. So there will be much dust not only from quarry operations but also from the bunds. Also from the heavy vehicle movements and the road surfaces.

Estimates of wind strength were extrapolated from 2006 data. 13 years ago. Climate changes have certainly occurred since then. Winds have become stronger, rainfall has changed. There are only minimal shelter belts of trees at the Quarry site at present and it will take years to establish any better protection - and even then the bunds will be quite far from the initial active quarry location, even further away than in our own location, as noted earlier.

Wind speed and direction monitors - again, who is to monitor them? Will they receive regular checks - eg by NIWA? FH state they will have monitors Downwind of the active quarry during SW wind conditions. With additionally “at least” one mobile monitor 9but when will it/then be moved?). Ambient wind monitoring around Yaldhurst is quoted for PM10 in 2017. But only for “upwind/downwind”, i.e W-East. There are other winds, as we well know and regularly experience.

Dust carries for long distances. There could well be problems using local playing fields if they are contaminated with even occasional dust particles coating the ground. Dust will settle - then be stirred up and breathed in by the players.

2. Water. There are already grave concerns regarding the aquifers which supply Christchurch’s pure water, and that of the nearby catchment area which includes the Selwyn district. As with the dust monitors, water monitoring is proposed to be done internally by FH. Copies of records can be requested by the Canterbury Regional Council etc but they will be just records made by instruments which may or may not be properly and regularly checked by an external body.

FH say there will ONLY be about 1 metre freeboard between the quarry pit floor and the “anticipated highest recorded groundwater levels”. Who is to record these levels, and when? It is known that increased irrigation particularly in the Central Canterbury Plains will probably result in a raised water level. FH say they will establish a surveyed datum point - but it could easily shift due to quite small earthquakes.

FH also claim they can “Take water as required” - a very vague statement. Will they apply for a variation in the future? What of the vast quantities of water used in the processing, not just truck washing - will it be discarded untreated? Why will stormwater not be collected? FH claim that using silt-laden water is impracticable, even with a reticulated network which they are reluctant to develop.

Re the disposal of contaminated water, diesel spills, etc. It is stated that water from truck washing, etc will be collected in a holding tank “before discharge to the ground”. Why will this water not be recirculated? Again, FH claim that using silt-laden water is impracticable.

3. Roads & Transport.
Residents of Templeton have already experienced major disruption of traffic along Kirk Road, which in addition to being an important entry point to the shops and the highway for people living in outlying districts, is lined at the Templeton end with a large primary school and preschool, a medical centre, a chemist and small shops. Traffic including some large trucks was rerouted along quiet back streets, including our own – where normally small children are safe to play with their scooters. We could always tell when the trucks came past.
Jones Rd is also a route of major concern, it is Templeton residents' main route out of town if we wish to avoid the highway, or to go to Rolleston for shopping, thus avoiding the congestion at Hornby. It is also a bus route where residents can join the bus safe from highway traffic. FH say they will upgrade Jones Road. But how often will repairs be needed, with the 1,500 trucks/day. Where will the traffic go during such necessary road repairs? - along the quiet back streets?

Large trucks - and we have been told there will be movement of up to 1,500 per day - no matter how well covered will cause dust, noise, vibration, road damage and even ground movement, especially at night when people expect a quiet and restful atmosphere. The population of Templeton is mixed - working people, retired people and also young families with babies. All will be majorly affected by the noise and vibration. Trucks also generate diesel fumes, and leave airborne particles on roads and nearby vegetation. Another health hazard.

Inter-site traffic is anticipated by FH; that from the Miners Rd site will come directly through Templeton. More noise, more dust, more fumes.

4. **Environmental Effects.**
FH state that the proposed quarry is to supply mainly southwest Christchurch - therefore a quarry a little further south away from residential areas would be just as convenient for such a purpose. They say they have searched extensively west of Christchurch - but only within 20 km from the city centre. From the map which they provide, there are many similarly-size areas just outside the 20 km radius. The railway line goes south and could still be used - and why will it not be utilised?

There could well be problems using playing fields etc if they are contaminated with even occasional dust particles coating the ground. Dust will settle - then be stirred up and breathed in by the players.

I am very concerned that existing ecosystems will be irremediably disturbed. It is difficult already to maintain a healthy balance in this, an outer urban area. Wild birds still visit our garden, but in decreasing numbers.

The Resource Management Act 1991 covers a great many environmental effects; most seem to have been ignored or dismissed as of no significance.

5. **Noise.**
It is not possible to dampen down the noise levels of 1,500 trucks thundering along roads, breaking up the road surfaces and generating dust, and shaking the foundations of nearby houses. The site offices, amenity blocks, workshops, refuelling areas, etc will all be outside the working quarry pit and therefore at ground level where noise will carry much further.

FH state that blasting will not be required but it may well be in future.

They intend to maintain truck movements 24 hours a day including Sundays and public holidays, and also ancillary activities including maintenance - all of which will generate noise and also require floodlighting at night. Noise and light are not conductive to good sleep.
SECTION THREE

Should the quarry go ahead, I would like it stipulated that REGULAR EXTERNAL monitoring of various items such as dust levels, water use, noise levels, etc be mandatory. FH should supply and maintain the instruments but all instruments as well as records should be regularly checked by an external body and more than once a year. The same would go for monitoring spillage of diesel etc. As a former Scientist I am well aware of the pitfalls of inadequately calibrated instruments.

2. Road use be strictly limited to main roads - if they are closed due to maintenance, vehicles should NOT be rerouted, even temporarily, through residential areas. Heavy fines should be imposed on the drivers who will inevitably try to take a short cut due to time constraints etc.

3. If possible, local residents should always have Right of Way - so if there is a traffic slow down due to roadworks and many trucks are queued up, they should let residential cars through first.

4. All or nearly all operations should cease on Sundays and Public Holidays.

Signed - Nancy Vada Gibb. 6 June 2019.