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**Subject:** Notifications Consent Submission: Group 422  
**Date:** Saturday, 1 June 2019 11:14:04 AM  
**Attachments:** [Submission-Nicholas-Howell2.docx](#)  
[Requested-Conditions-in-the-event-of-the-consent-being-granted-Nicholas-Howell2.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:** Nicholas Howell

**Care of:**



**Contact by email:** Yes

**Is a trade competitor:** No

**Directly affected:** Yes

**Consent support/hearing details**

- CRC192408: oppose | WANT to be heard | will NOT consider 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 NOT consider joint hearing
  - CRC192412: oppose | WANT to be heard | will NOT consider joint hearing
  - CRC192413: oppose | WANT to be heard | will NOT consider joint hearing
  - CRC192414: oppose | WANT to be heard | will NOT consider joint hearing
  - RC185627: oppose | WANT to be heard | will NOT consider joint hearing
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**Reasons comment:**

Please see attached Word document

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**Consent comment:**

Please see attached Word document

**Submission by Nicholas Howell to the hearings regarding quarry application by Fulton Hogan at Dawsons and Jones roads, Templeton.**

**I hereby state I wish to object to this application in every respect.**

**My concerns and reasons for opposing this application are as follows.**

**1. Dust.**

- Living as we do on the Canterbury plain we are all acutely aware of the climatic conditions surrounding us. There are often long dry spells, and it is almost always windy, and I do not believe that Fulton Hogan's suggested mitigation measures will stop dust blowing from the site or from trucks.
- Particulate matter blowing from quarrying operations is inevitable, unavoidable and harmful. Even using all available means (bunds, shelter belts, water spraying) it is not possible to mitigate such air pollution to safe levels this close to a town.
- The understanding of the harmful effects of particulate matter inhalation has progressed beyond measure in recent times, and we are now in a position to be objective – dust is harmful both in the short and long term. People's health will be impacted.

- Dust from such operations impacts health, causes annoyance, affects how people can live, affects visibility and safety.
- How far will dust carry? Far further than Fulton Hogan suggest in their presentation.
- The proposed planting of shrubs and trees on bunds to stop the passage of dust is unrealistic – plants do not grow when smothered in a layer of dust – the artists' impressions provided by Fulton Hogan are stangely devoid of any dust (Appendix E pp 18-24).
- Use of water spray to try and control dust – when used on the ad hoc basis seen at other local quarries it is ineffective, and will just necessitate huge extraction of ground water which in itself will be harmful.
- Who will objectively monitor dust levels? The recent attempt at monitoring dust at Pound road shows how difficult it is to be independent and above suspicion.
- What will be the effects on land, property, dwellings and crops nearby? All negative.
- As a veterinarian the impact on animals is a real concern to me. Horses are especially susceptible to dust and air pollution.

## 2. Noise

I currently live 2.5km from our nearest quarry and I can hear the operations most days. Only when the wind blows directly towards the quarry can I not hear it. Templeton is only 700 metres from the proposed Roydon quarry – I need say no more.

- All equipment and operations will generate noise
- Processing of aggregate on-site will generate more noise
- Heavy vehicular traffic taking product from the site and bringing raw material from other sites for processing will generate the most noise of all
- 1300 heavy vehicle movements per day through Templeton equates to one a minute twenty four hours a day seven days a week.
- Fulton Hogan claim that current maximum road noise levels will not be exceeded, but they conveniently fail to mention that the levels will be reached far more often, especially at night, with the vast increase in heavy vehicle movement.
- Whatever noise limits are placed it is impossible to make heavy vehicles quieter.
- Who will independently monitor noise levels and the hours over which noise is made?

### **3. Traffic and roads**

- Volumes of heavy traffic. Our local roads are already busy. Adding 1500 heavy vehicle movements per day would be seriously detrimental.
- \$195million has been spent building the CSM2 to reduce traffic volumes and levels of risk on local roads. Permitting the quarry would reverse any gains, and more.
- The suggested roundabout at the junction of Dawsons and Jones roads will be carnage – this will be gridlocked repeatedly when rail traffic passes.
- Safety impacts - close to this proposed development are several of the most dangerous road junctions in the district, they will become more dangerous (there was another serious accident recently at the intersection of Dawsons and Newtons roads)
- Damage to roads – there would be a huge increase in heavy vehicle movements, and the state of the roads would suffer. Our roads are already delicate, more potholes would be unsafe.
- Noise – trucks are not quiet vehicles. Engine noise, braking, engine braking, bodywork noise – and much of this passing by residential properties and through Templeton.
- Exhaust emissions will impact air quality

- Dust from trucks – spreads the quarry dust far and wide. This factor is often overlooked but is vital.
- By their own admission Fulton Hogan point out that the majority of dust pollution and noise pollution comes from heavy vehicle movements (Appendix D pp 12-14).

#### **4. Impact on aquifers**

This will be threefold impact

- Vastly increased extraction of water for processing and dust control (if water extraction permits granted), although with ECAN already exceeding the water extraction limits it is hard to see how further extraction permits can be granted.
- Damage to delicate aquifers by the quarrying operation itself
- Leaching of contamination into aquifers from the quarrying operations and then from landfill remediation

#### **5. Remediation**

- What will it cost?

- Who pays? In the long run almost always it is not the quarrying company but the local authority ie the local people who pay.
- Who will monitor it? Monitoring *has* to be independent and reliable. It must at the same time be entirely funded by, but uninfluenced by, Fulton Hogan
- What will the deficit be filled with? Fulton Hogan claim 'clean fill' only. My concern here is that it will be anything but 'clean'.
- It seems almost certain that the back fill be be made up of refuse landfill. This brings with it another raft of health issues – dust, smell, pests, contamination, asbestos, heavy traffic and run off. This run off will in due course cause further damage to aquifers/water supplies.
- Fulton Hogan propose that operating hours for ingress of infill will be 24 hours a day. More noise, dust and pollution.
- The site will apparently not be backfilled to ground level.

## **6. Setting a precedent**

- Please look at the map on page 5 of Fulton Hogan's resource consent application entitled 'Analysis of potential quarrying sites'. If this current application were to be consented it would open the floodgates



to other applications from this and other mining companies for quarrying throughout the district – they will after all have to compete on cost with Fulton Hogan.

- This unpalatable prospect is one that should be avoided at all costs.
- My home immediately abuts one of the blocks marked in yellow – the fear of what might happen next to my family’s home keeps me awake at night.

## **7. Amenity Values**

- All of the above will impact amenity values – noise, dust, groundwater, roads, traffic, and all will be negative effects.
- For Fulton Hogan to claim that these effects will be ‘less than minor to indiscernable’ is questionable.
- Properties near this proposed site have already been put on the market, and they are priced to sell – this means priced low. So even before the hearing has happened this proposed quarry has started lowering property values in the area.

## 8. Let us not be naive

The psychology involved is wafer thin. Fulton Hogan in asking for *everything* are just hoping for some, or most, of their requests to be granted. By asking for 24/7 operation and 1500 truck movements what they trying to is get a 'compromise' consent of (for example) 8am to 8pm and 750 truck movements per day. If such a result occurred it is safe to assume there would be celebrations at Fulton Hogan.

- Fulton Hogan have put together a glossy and professional application. It shows a clean, quiet and healthy impression of a quarry operation that will be anything but. We must be cogent that Fulton Hogan are presenting pictures of something that is an amenity rather than open industrial site, but the reality will not be so.
- We must not be beguiled into believing that this will bring no impact, no pollution, no damage to the environment and will not impact the lives of many in a negative manner
- We would be foolish in the extreme to believe such a rose-tinted, one eyed version of reality
- The addition of a walking track is just smoke and mirrors – surely no one could believe such a walking track can make a quarry healthy. But it will certainly make the least healthy walking track possible.

## **In Conclusion**

- This proposed quarry is too big, too bad and too harmful to be permitted to go ahead this close to a town.
- It is impossible for a quarry to operate this close to a town for forty years without causing major suffering and impact.
- Fulton Hogan state in their application that the local economy will benefit from the development. It will not, it will be destroyed – people will leave, property prices will fall, local businesses will suffer.
- The panel must not be fooled into granting *limited* consent as a compromise – any consent is a full green light, Fulton Hogan will ask for more and more.
- The extraction and processing of aggregate cannot be performed without diminishing air, water and life quality.
- If this project were allowed to go ahead it would be an act of corporate cruelty and an expression of collective madness.

**For once we must put people before profits, community before corporates and common sense before silicosis.**



## **Requested Conditions in the event of the consent being granted.**

### **Nicholas Howell**

- **Setbacks**
- A setback of 250 metres from all boundaries is a minimum to keep health impacts tolerable, this means no mining closer than 250 metres to any boundary, and this condition to adhered to for the duration of the operation.
- Setbacks to be measured from property boundaries and *not* from neighbouring dwellings, and setbacks *must* be non-renegotiable in the future.
- **Dust management.**
- No dust to be allowed to leave the site, at all, at any time – if dust is being carried over the boundary by wind then all operations are to stop on that day.
- Water spraying to be used at all times during operation
- No operation on windy days to be allowed
- All roads on-site to be sealed
- Trucks to be washed prior to leaving the site (not just wheel bath, must be complete wash down).

- **Operations**

- Hours of operation 08:00 – 18:00 maximum five days a week (non-renegotiable afterwards). NO 24 hour operation and NO weekend operations
- No processing of aggregate brought onto the site from other sites.
- No extension to concrete or asphalt production
- Minimise areas used at any one time (maximum 4 hectares)
- A one metre separation distance between quarrying activity and groundwater levels is inadequate to preserve water quality (resource consent application page 30). Three metres should be specified as a minimum.

- **Remediation**

- Must be clean healthy soil and NOT landfill
- Backfill must be to previous ground level and not as suggested below current ground levels.
- Must also be fully paid for by Fulton Hogan in perpetuity.
- Independent inspections annually to ensure remediation following required guidelines, again to be funded by Fulton Hogan

- Snap inspections to be undertaken at any time
- **Community liaison body** to be set up to enable the voices of local people to be heard.
- **Monitoring**
  - Must be independent but funded by Fulton Hogan.
  - Dust monitoring to take place at site boundaries and remotely in all directions away from the site.
  - Water monitoring at all neighbouring bores.
  - Noise monitoring also along boundaries and remotely, also along local roads.
  - All monitoring information to be available to general public unadulterated and in real time.
  - A monitoring website should be set up to provide all such monitoring information, with complaints page being available at all times.
- **Future changes**
  - No further water extraction permits to be granted (clearly an ECAN issue)

- All further applications for variations to consents **MUST** be publicly notified.