

From: [REDACTED]
To: [Hearings](#)
Cc: submissions@golder.co.nz
Subject: Notifications Consent Submission: Group 422
Date: Thursday, 6 June 2019 1:05:29 PM

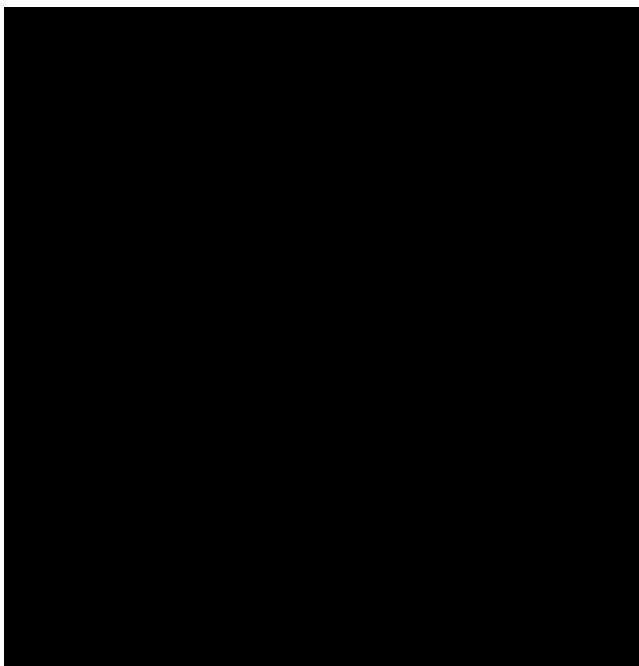
Group ID: 422

Consent name: Fulton Hogan - Roydon Quarry

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

Name: Lyall McFarlane

Care of:



Contact by email: Yes

Is a trade competitor: No

Directly affected: Yes

Consent support/hearing details

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

Reasons comment:

A quarry with its associated traffic increases and extraction creating dust detrimental to residents health will destroy the existing community comforts and culture of the urban residents of Templeton.

Consent comment:

Refuse all consents Fulton and Hogan have applied for. It's speculated "If a tree falls in a forest and no one hears it, does it make a sound?" In the same vein, I wonder if, when "stringent" conditions are imposed on quarrying activity and ECan doesn't police them, are they conditions at all. At a community meeting in January 2018, ECan's Tania Harris told us that there wasn't enough funding for them to constantly monitor quarries, and that they relied on the public to bring transgressions to ECan's notice. This puts the entire onus on residents to initiate enforcement of legally imposed conditions. With other quarries in the area, even when the public has drawn ECan's attention to the operator's alleged failure to adhere to their "strict" operating conditions, the regional body often refuses to investigate. Witness my brother, Sean's complaint about dust billowing from Fulton Hogan's West Coast Road Quarry on 1st February 2018, for which he provided filmed footage. His complaint was responded to three weeks after it was made. It is shown in full below: Subject: Dust event video Date: Fri, 23 Feb 2018 02:16:28 +0000 From: Chris Elsmore [REDACTED] Hello Sean, Thank you for forwarding your video of dust at Fulton Hogan's quarry by the West Coast road. Wind conditions on the 1st of February were extremely challenging for all consent holders with dust management demands on their sites. I am satisfied that Fulton Hogan's dust management procedures and the decision to cease operations and close the quarry during this event contributed to minimising the dust discharge from this site. Fulton Hogan's actions have been consistent with the site management plan that has been submitted and accepted by Environment Canterbury. I will not be taking any further action regarding this event. Regards, Chris Elsmore *Chris Elsmore* Resource Management Officer II Monitoring and Compliance Environment Canterbury Despite combing through the conditions imposed on that quarry, I could find no instance of legal let-offs from the obligation to prevent dust escaping by watering and other means, on the grounds of "particularly challenging conditions." I also believe the operations were ongoing long after that particular dust storm developed. Conditions will always be "challenging" at that time of year. It's the height of the Nor' wester season. A perusal of the ECan's site shows that many complaints are not taken any further. It's simply noted that no one was sent to investigate. Look for the words "Unsubstantiated" and "Not visited". ECan seems to regularly think that no offence has occurred simply because it can't be bothered to investigate. This would make the bureaucrats in a Franz Kafka novel applaud. In July 2018 David Sands JP, brought to ECans's notice that the articulated trucks carrying aggregate from Miner's Road to the highway development on Weedons-Ross Road were hardly ever covered, as they were obliged to be. For a brief period after his contact, the trucks were covered. But, about a fortnight later, normal uncovered service resumed. What are we to do? Making constant complaints is wearying for us, and, given the lack of enthusiasm shown by ECan, largely futile. Why should we constantly have to be the instigators, when we lack even the most basic monitoring equipment? A cynic might be tempted to conclude that ECan has given the quarrying firms carte blanche to do as they want. If it receives any complaint about them, it goes through the bureaucratic motions, but only barely. The public don't have the money to challenge each individual half-hearted, or non-investigation. So rather than be fed into the bureaucratic/legal meat grinder, they simply give up. I have spoken to people near to the Rolleston, Pound Road and Yaldhurst quarries. After a while, most seem to give up on seeing any real action to defend their interests. Perhaps this is intentional. Or perhaps it is simply ineptitude, married to a lack of resources. In either case, this needs to change if a quarry is sited so close to an area of about two thousand people. I have personally seen large dust clouds emanating from the Pound Road Quarry and, like most, not bothered to report it. If ECan followed it up at all, it would be well after the event. This

situation puts me in mind of Inspector Clouseau on the trail of the Pink Panther. This leads to a place where the quarrying companies are largely working on the honour system. Is self-monitoring any sort of monitoring at all? Last year's summer and spring monitoring of quarries by ECan, was fine, but it was only for a limited time in the wettest period ever recorded for the time of year. And only four months of what was originally supposed to be a year-long project. Would we meekly comply with all our tax obligations if the IRD didn't have teams of forensic accountants trying to catch us out? I can confess to not overly adhering to the speed limit in areas free of cops and cameras. "But I have to speed," I reason, "I've got to be somewhere important in five/ten/ twenty minutes." Wouldn't similar thoughts occur to a truck driver, pressed for time, who forgoes covering his load; or a quarry manager, who doesn't hose down dust because of "particularly challenging conditions?" Whether one agrees with those who fear the minute dust particles from the greywacke rock will potentially be a catalyst for silicosis, or more benignly, Dr Ramon Pink's contention that the site will only provide "nuisance value", any future quarry's emissions need to be monitored 24/7, year-round. A "nuisance" could include persistent coughs, sore throats and nosebleeds for the forty year life of the quarry - that's quite a nuisance. Everything should be done to monitor dust emissions, independently of Fulton Hogan, i.e., there should be local government funded monitoring – cameras on Dawson's, Jones' and Main South Roads to monitor that loads of aggregate are covered correctly, and to register the number plates of transgressors. While Fulton Hogan pledged, to some individual Templeton residents, at information sessions at the local RSA, that it wouldn't send 90 percent of traffic along the Jones' Road, Railway Terrace, Waterloo Road route, I believe they may try to up this volume at times. The proposed Main South Road route encompasses a stretch of highway between Templeton and Rolleston, which is regularly closed, due to motor accidents. When this happens, all that traffic comes along Jones' Road, Railway Terrace and Waterloo Road. This would apply to trucks toing and froing from the proposed quarry. Unless, of course, they diverted this traffic on to Maddison's Road, which would be more costly for them. Cameras should look into the quarry itself. They wouldn't pick up the levels of particulate of the instrument used during Ecan's brief monitoring of Pound Road, but they would at least show large dust clouds. A Go Pro Camera costs less than a good phone. All I am asking for is the equivalent a few such devices on poles. Current technology makes this a cheap and doable proposition. Given the increased rateable value of the quarry, the powers-that-be can well afford to cough up for monitoring equipment, so Templeton residents are spared a lot more coughing up – of particulate from their lungs. Failure to provide constant monitoring of the proposed quarry and its environs, in the light of past experience, will make whatever this hearing imposes in the way of operating conditions, merely a quasi-judicial wish list.