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**Subject:** Notifications Consent Submission: Group 422  
**Date:** Wednesday, 5 June 2019 5:07:16 PM  
**Attachments:** [Roydon-Submission.pdf](#)

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**Group ID: 422**

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

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

**Name:** Steve Penny

**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
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**Reasons comment:**

The submitter's concerns include is the increased risk to personal health, safety, wellbeing and ability to cycle in the Templeton area for the submitter and the wider Templeton community. The risks are envisaged to come from dust, noise and traffic. For detailed reasoning around dust, noise and traffic please see attached submission.

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**Consent comment:**

I wish the consent authority to reject all applications pertaining to quarrying at the proposed Roydon quarry location. Given the inability of ECAN to police the existing quarries (see attached submission) the submitter feels that there are no conditions under which is is safe for the quarry to operate near such a large residential community.

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# Submission in response to application for resource consent

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For the attention of **Environment Canterbury** and **Selwyn District Council**.

Submitted by: **Steve Penny**



In response to the Resource Consent application by Fulton Hogan Limited to operate a quarry referred to as “Roydon Quarry” involving the following applications:

## **Canterbury Regional Council**

CRC192408 – A land use consent to excavate material.

CRC192409 – A land use consent to deposit cleanfill over an unconfined/semi-confined aquifer.

CRC192410 – A discharge permit to discharge contaminants into air from an industrial or trade premise or process.

CRC192411 – A discharge permit to discharge contaminants into land where it may enter water from an industrial or trade process within the Selwyn-Te Waihora sub-region.

CRC192412 – A discharge permit to discharge stormwater into land where contaminants may enter groundwater.

CRC192413 – A discharge permit to discharge contaminants into land where contaminants may enter groundwater associated with the deposition of cleanfill for site rehabilitation.

CRC192414 – A water permit to use water for aggregate washing and dust suppression, either as a change to the conditions of resource consent CRC182422 or a new water permit to use water.

## **Selwyn District Council**

RC185627 - A land use consent for gravel extraction and processing operations within the Inner Plains zone.

The submitter **opposes** all of the above applications.

The submitter is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

The following sections describe the submitter's reasons for opposition to the above referenced applications.

**Background information providing personal insight into reasons for opposition**

The submitter has already been exposed to many of the potential issues with quarry operations and heavy vehicles. The primary issues to date involve exposure to dust and close encounters with large trucks. I am a regular cyclist and like to commute to work in Harewood and also cycle for leisure and exercise in the evenings and weekend.

- The submitter's primary concern is the increased risk to personal health, safety, wellbeing and ability to cycle in the Templeton area.
- Secondary concerns revolve arounds impacts on the wider community with the personal risks above being also presented to well established existing Templeton community.
- Tertiary concerns are around the reduced quality of life in the Templeton area due to dust, noise and traffic and the impacts that would affect future growth of this friendly community.

The following table highlights the more significant risks perceived by the submitter.

<b>Risk</b>	<b>Health</b>	<b>Safety</b>	<b>Wellbeing</b>	<b>Cycling</b>
<b>Dust</b>	At risk		At risk	At risk
<b>Traffic</b>	At risk	At risk	At risk	At risk
<b>Water</b>	At risk		At risk	

## **Specific concerns**

### **Dust**

#### Concerns:

Dust is an all encompassing term. In the case of the Roydon Quarry application there are many potential effects on the environment and subsequent land use of that environment.

Dust > PM10 can obstruct vision and when cycling can cause temporary loss of vision and irritated eyes and throat.

Dust categorized as PM10 can cause the above but also have longer lasting health effects.

Dust categorized as PM4, particularly Respirable Crystalline Silicon (RCS) that will be produced on site can have long lasting and even permanent health effects.

Dust categorized as PM2.5 has been shown to make its way into the deepest parts of the lungs and even be absorbed into the blood and has been found to have reached the brain.

Any RCS dust that escapes the Roydon quarry and inhaled can lead to the very serious condition of Silicosis.

#### Reasons for concerns:

- 1) Regulation 17 of the NESAQ expressly states that no PM10 generating activity should be allowed to discharge into airshed clean air zones. The Roydon application is directly adjacent to the airshed and this alone should be enough to reject the application. There is effectively no setback so there will be discharge into the airshed clean air zone where the submitter resides.
- 2) Bunds that are proposed cannot be effective until substantial vegetation to a height of many meters is in place. This takes many years and the applicant intends to start quarrying well before then.
- 3) Cycling has already been affected for the submitter. Pound Road has already become a no-go area due to dust from the quarry there. Any dust released from the Roydon quarry will leave the submitter unable to use the new cycleway adjacent on Jones Road or use Dawsons Road to cycle to McLeans Island.
- 4) Covered trucks - the submitter regularly sees quarry trucks that have aggregate exposed which is blown from the vehicle via winds or even just the vehicle movement. This dust has made it to the submitter's eyes, nose and mouth whilst cycling on more than one occasion. This includes many trunks fitted with covers but they simply were not engaged.

- 5) Complaints about dust to ECAN have resulted in no action taken and explanations have not been congruent with direct observations of the submitter. As this application is designed to move Pound Road operations to the Roydon quarry then the submitter can have no other expectation than the same outcomes as those at Pound Road, including the relative inaction of ECAN and resulting classification of “**Event not Substantiated**” by ECAN in response to any violation of dust leaving the bounds of the quarry and discharging into the surrounding environment.

All of the above reasons lead the submitter to fear that the future quality of life will be reduced due to discharge into the environment of dust that can cause maladies from irritation to Silicosis.

Personal Evidence:

The following photographs are an example of what the submitter drives through most weeks during dry weather and cannot cycle through causing alternate routes to be taken. These are from Pound Road - the quarry that is intended to be replaced by the Roydon application.





These photos, along with several others, have already been submitted to ECAN through the complaints process with no apparent action being taken.

This close-up clearly shows what the submitter is concerned about including larger gravel artifacts being spread onto roads and subsequently being crushed into fine particulate matter by passing vehicles and hence spread large distances from the quarry and anywhere aggregate is spilt.



These photographs are enough for the submitter to wholeheartedly disagree with the statement from the applicant the the Roydon quarry is:

*“unlikely to experience any offensive or objectionable dust impacts.”*

The photographs attached, and more for other events, were submitted as a complaint to ECAN. ECAN rarely attend site in response to a complaint and typically register the complaints as “**Event not Substantiated**”.

A comparative photo to show the air in Templeton is provided to show what the submitter's expectation is for local air quality. This was taken on the same day as the above photos for comparison.



Iraklis Close, Templeton - reference photo.



## Traffic

### Concerns:

Vehicle emissions are now known to be harmful to health. In addition to the aforementioned dust, diesel trucks emit oxides of nitrogen (NOX), carbon monoxide (CO), PM10 and sulphur dioxide (SO2).

Heavy trucks with diesel engines emit much greater levels of noise than road cars.

Heavily loaded vehicles with large engines can generate large amounts of vibration.

Templeton has narrow, winding, roads with tight, difficult junctions. Heavy trucks pose an potential increase to accident risk.

### Reasons for concerns:

- 1) Regulation 17 of the NESAQ expressly states that no PM10 generating activity should be allowed to discharge into airshed clean air zones. The Roydon application is directly adjacent to the airshed. The vehicles that remove the aggregate from the quarry emit dust, oxides of nitrogen (NOX), carbon monoxide (CO), PM10 and sulphur dioxide (SO2) and can drive within 60 metres of the submitter's residence in large numbers. This would cause a substantial increase in these toxic substances being released into the local environment. All of these discharges are known to adversely affect health and would be concentrated within the submitter's locale as a direct consequence of quarry operations.
- 2) Noise emitted by large numbers of heavy trucks would be concentrated within the submitter's locale as a direct consequence of quarry operations.
- 3) Vibration emitted by large numbers of heavy trucks would be concentrated within the submitter's locale as a direct consequence of quarry operations.
- 4) The roads in Templeton, particularly Railway Terrace and the junction leading to Waterloo Road, are not suitable for heavy vehicles. In addition to the high accident risk, particularly around crossing the centre line into oncoming traffic, trucks can spill aggregate negotiating the corners which subsequently gets pulverised into more fine particulate dust by other vehicles. Heavy vehicles also generate large drafts on passing, further distributing this dust. In the case of Roydon quarry, this dust would be effectively discharged into the air by the secondary means of truck operations.

All of the above reasons lead the submitter to fear that the future quality of life will be reduced due to the effects of heavy vehicle operation as a direct consequence of the proximity of the Roydon quarry to a residential area. This operation could subsequently lead to poorer health, wellbeing and safety for submitter and the local community.

### Personal Evidence:

Diesel trucks are heavily polluting and previous evidence above shows how trucks can spread dust from an operating quarry. Trucks, including quarry trucks, are already using Railway Terrace and Waterloo Road, even without the Roydon quarry operating. These trucks have spilt aggregate on more than one occasion. This spilt aggregate has led to the following:

- 1) Slippery corners for cars and dangerously slippery for cycling.
- 2) Dust generated by every vehicle driving over the aggregate.

When cycling the submitter can smell the pungent fumes containing the toxic discharge from the diesel vehicles. Whilst unpleasant, it is relatively rare being restricted to the odd bus and a few trucks. As trucks are already using this route, presumably coming from Quarries near Rolleston, the submitter can only expect a significant increase in quarry trucks if the application for Roydon were to be granted.

We do hear the occasional truck when enjoying our property. The frequency is so low that it is currently of little concern, akin to the occasional airplane or train. With a projected 1500 to 3000 truck movements a day, even if only a small proportion exit via Railway Terrace, there will be an increase in noise and vibration which would be semi-persistent. This noise and vibration would be a direct consequence of the Roydon quarry operations being so close to the Templeton community.

The submitter would also like to highlight that, when cycling, there have been several occasions when it was felt necessary to leave the road for fear of an accident with quarry trucks on railway terrace. On one occasion a truck was so far into the hard shoulder that an exit onto the grass was the only safe option.

## Water

### Concerns:

Quarrying activity near or even below the water table could cause significant contamination of the water.

Ponds could attract birds and increase the risk of bird strike for aircraft. The proposed Roydon quarry site has many aircraft a day traversing above the site.

Remediation of the land may be inadequate as backfill may be contaminated and areas that only receive soil covering could lead to future land use contamination of the aquifer water due to the proposed aggressive depth planned for the quarry.

### Reasons for concerns:

Quarrying involves heavy trucks that require diesel and oil that may end up being spilt and entering the aquifer.

The submitter's workplace in Harewood was not allowed an ornamental water feature due to the risks of bird strike. In the 10 years in that location the submitter cannot remember seeing a plane directly overhead. In Templeton there can be many planes directly overhead in a single day.

The land at the moment can be used for farming and has potential for further residential expansion as Templeton grows. The submitter fears that the planned minimal backfill will leave a large depression in the ground that will capture water and be susceptible to flooding due to both its depth and proximity to the water table. The land would be unsuitable for future residential development and, if farmed, would capture animal waste in the depression and seep into the aquifer below. A discharge like this could even happen during quarry activities as the land not currently being worked on is proposed to be farmed in tandem with quarry operations.

### Evidence:

From the submission:

*"It is not proposed that the entire site will be backfilled to original ground level, but it is anticipated that the final finished site level will be higher than the base of pit excavations across the pit."*

The submitter has become aware that the Central Plains Water irrigation scheme is expected to raise water levels in aquifers in the area so it would raise the possibility that quarrying could end up being below the water table which is unacceptable.

## **Summary**

The submitter has established many concerns that are believed to not be adequately addressed by the application for Roydon quarry. Whilst the submitter has even more concerns, such as road damage, this document covers enough to show that there are multiple potential issues from placing a quarry in such a populous residential area.

Applying the precautionary principle it would seem very likely for one or more risks to eventuate over the 35 years or more of planned quarry operations.

**The lack of inaction to date on reported issues at other quarries causes stress and frustration for the submitter. The submitter can only expect this to get worse if this application is granted as the dust discharges and truck incidents would now be a more regular occurrence for the submitter due to the proximity to Templeton.**

The submitter opposes all seven applications for the above reasons and fears no path to resolution of future reported violations, if they occur, due to the continued inaction of ECAN to previous complaints.