

From: [REDACTED]
To: [Hearings](#)
Cc: submissions@golder.co.nz
Subject: Notifications Consent Submission: Group 422
Date: Wednesday, 5 June 2019 8:32:55 PM
Attachments: [ECan-submission.docx](#)

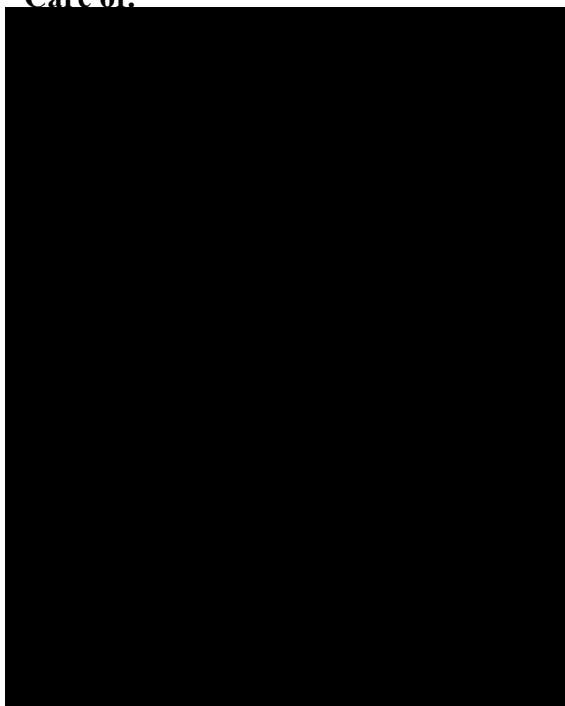
Group ID: 422

Consent name: Fulton Hogan - Roydon Quarry

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

Name: Nathaniel Seddon-Smith

Care of:



Contact by email: No

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:

Negative impact on local health through dust dispersion and noise, negative impact on local business, negative environmental impact

Consent comment:

Total rejection of the Roydon Quarry project

Additional information supporting the submission of:

Mr N Seddon-Smith

Re ECAN applications:

CRC192408 Land use to excavate material

CRC182409 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

Re Selwyn Council Applications:

RC185627 Land use for gravel extraction and processes

I write to you today to strongly object to the all the above Resource Consent Applications concerning the proposed quarry on the edge of Templeton. I wish to express my grave concerns as a resident of Templeton over the future of this project and its consequences for the community. It is my sincere belief that in rubber stamping Fulton Hogan's quarry plan, the Canterbury District Council and Selwyn District Council will be abrogating their responsibility to their constituents and to the environment in favour of the profit margins of one of New Zealand's largest construction conglomerates. The construction of this quarry in such close proximity to a residential area will:

- Create health hazards and disruptive noise in a previously peaceful pocket of the Christchurch suburbs;
- Negatively affect small businesses and farmers in the Templeton-West Melton-Rolleston area;
- Have a strongly negative impact on the water resources of the mid-Canterbury area.

Dust and Community Health

The construction of this site will create a large amount of dust and airborne particles no matter what kind of windbreak Fulton Hogan proposes. The sandy composition of the ground acknowledged in the planning application and the nature of the crushing work that will be undertaken in the aggregate operation will create dust conditions that no windbreak will completely stop when the Nor'wester blows through. The company has proposed that trees will mitigate the dust factor, but I find this hard to believe. They have chosen that land because it is stony and full of gravel, which is not ideal tree-growing land. Mature trees planted now will likely die, and saplings will take years to come into any kind of effect.

Furthermore, while the Fulton Hogan may be able to partially mitigate the dust blowing from the site itself, there have been no guarantees concerning the trucks that will be carrying the product. These trucks will spread dust from their loads and wheels further from the site to be left to blow through the neighbourhood. Their exhaust fumes will also pollute the area, taking away one of the key attractions of Templeton: its lack of city smog.

The accumulation of dust in a residential area would be bad enough with the unsightliness that would entail, but we also have concerns for the health of the community. Besides the obvious risks of lung and eye irritation from the dust, a number of studies have shown that silicate particulate matter of PM 10 and PM 2.5, the type of dust that is likely to be generated on this site, may have a long-term risk of certain types of cancer. The exhaust fumes emitted by the trucks may also compound this risk, as such smoke can exacerbate already present cancer risks.

In our community there are many children, for whom exposure to this kind of particulate matter could present a lifetime risk. With their play times coming during the middle of the day when quarry activity will be at its highest, they will be inhaling much more dust and fumes than the working adults of the community who will not be at home during the operations time. The lifetime health risk posed to so many young people is too great a risk to be conscienced by our representative councils.

Noise

Fulton Hogan claim that their proposal for sinking the operations below ground level will eliminate any risk of noise exposure. I find these claims to be dubious. The deep bass noises of 20-30Hz frequencies which are perceptible to human hearing and that are likely to be emitted by some of the equipment will have wavelengths of 5-15m. Even if the operation is sunk fully ten metres into the ground as the application claims, the deepest and most penetrating sounds will still be emitted, and such noise will penetrate the structures of any wall not made of concrete. In Templeton, this is a uncommon building material, particularly on walls facing west. This noise will be a constant irritation for the residents of Templeton.

Furthermore, there will an estimated 1500 trucks used as part of this aggregate operation. These trucks will of course be high-capacity industrial vehicles with noisy diesel engines which are totally unsuited to residential roads. While Fulton Hogan has stated that they would not drive vehicles down Kirk Road, the residents of Templeton have no way to hold the company to account for this, nor can we predict the actions of individual drivers who may not be employed by Fulton Hogan themselves. This not only presents a noise irritation but also a danger to the many children who attend primary school on Kirk Road.

We are also concerned that other roads which are also partly residential such as the eastern end of Railway Terrace will become used as thoroughfares for these heavy vehicles. This would bring the trucks close to majority of the houses in Templeton, which would defeat the purpose of

any kind of ban on Kirk Road. Once again, we have no way to know that any promise made by the company will be enforced and as a huge private company, the residents of a small community have no way to hold them to account.

Many of the residents of Templeton have moved there to get away from the bustle and noise of the city. A semi-rural location near the highway has provided my family and the other households of Templeton with the peace and fresh air of the countryside while remaining close to our jobs, combined with a strong sense of hapori whanui. We strongly object to having this taken from us by a big development company who could easily choose a site further away from a community centre.

Small Business Impact

Of all the immediate impacts of the quarry's construction, the one that I am most concerned about is the impact it will have on small businesses in the Templeton, Rolleston and West Melton areas. In this fertile area, many organic smallholders, horse breeders and trainers, and livestock farms have set themselves up on a patch that is close to the large customer base of Christchurch but distant enough to avoid the pollution of the city. The quarry could bring an end to many of these entrepreneurs and their dreams in favour of the already stuffed pockets of Fulton Hogan.

Regarding livestock, the dust and noise generated by the quarry will have an obvious negative impact. Horses in particular are very sensitive to dust, in fact during the long dry summer that has just passed, many horse owners saw their animals fall sick with lung conditions. These lung conditions started by dust can quickly develop into more serious and life threatening problems. As I have already stated, I can see no way for the quarry to avoid being the centre of a dust bowl when the Nor'wester blows through the plains. With their animals getting sick, horse and other livestock owners will be forced to reconsider whether this area is the best place for their business.

As for agricultural farmers, there are hundreds of small organic farms on the plains west of Christchurch, harvesting quality products for the markets of the big city. Recently I was speaking to an organic garlic farmer who lives less than a kilometre from the proposed site, who told me that garlic is particularly sensitive to dust matter. She informed me that while the crop is manageable under the current level of particle settlement, the addition of the extra dust so close to her farm may require her to invest in extra protection for her crops, an investment that she feels she is unlikely to be able to afford in the long term.

Small businesses are the lifeblood of the community in this part of the plains and they are important to our hapori whanui. It is shameful to see them being cast aside so carelessly by a council that claims to encourage entrepreneurship in favour of helping Fulton Hogan to their next profit.

Water Use and Environmental Impact

Finally, I strenuously object to the environmental impact of the proposed site, and in particular its use and abuse of our precious water resources. The carrying-over of the previous water permit without review was extremely unjust. With the Selwyn-Te Waihora basin currently being drawn at 104% of capacity, the upper Selwyn River running dry above ground and even modest water permit requests from small businesses and farmers being rejected, there is clearly a need to reconsider our water use for the long term good of the people and environment of the mid-Canterbury plains. To suddenly see a huge business like Fulton Hogan steam into the area and get an water permit decades old and designated for irrigation rubber stamped for quarry use without and further consideration of its impact is extremely unjust to the people of Selwyn and Canterbury and prejudicial to the environment.

Not only is Fulton Hogan being allowed to draw an obscene amount of our water for their industrial use, but their activities are likely to have a long-term negative impact on the artesian water beneath the plains that we so treasure. One source of concern is the cleaning ponds that the company has proposed for the site. Very little is being said about them; how large they will be, which chemicals will be used on site, and most importantly, how the company plans to prevent this dirty water from leaching into the aquifers beneath the site.

Fulton Hogan also states that a water flow contiguous with Aquifer 1 is present at 11m below ground level, so their quarry will go no deeper than 10m. Industrial equipment being used just a metre above our drinking water present a very real risk of contamination from fuel leaks and industrial products. There is also the the risk of an unintentional breach of the this barrier, a likely scenario when heavy industrial vehicles are being used around the clock.

Then there is the cleanfill. The name seems designed to reassure us that nothing but natural material will be deposited in the site when the quarry closes, but I am very skeptical of this claim. In other sites around the city, what was thought to be clean infill material later turned out to be contaminated with asbestos. As it stands there is nothing to reassure us that infill material will be clean. If the infill material contains harmful substances, they will leach into the water table for years to come, poisoning one of Christchurch's most treasured natural resources and doing untold environmental damage.

It seems to me that despite the branding of Environment Canterbury, the Regional Council is leaning towards selling out the environment in favour of Fulton Hogan's back pocket. I would implore the council to rethink this decision based on these consequences for our already overstretched water resources and what that could mean for our environment.

Conclusion

There are many sound reasons for the residents of Templeton to be totally opposed to this quarry's development, and I have listed just a few in my submission. The approval of this project would be a black mark on the Canterbury Regional Council that was so recently re-formed,

shamefully choosing the side of big business and big money over their duty of care to their constituents, local businesses and the environment.

If the councils are determined to go ahead with this plan despite our reasonable and just objections, there are some steps that we would consider as a bare minimum for acceptable risk management:

- Heavy trucks to be banned from all residential areas of Templeton, including the eastern end of Railway Terrace, Kirk Road between Madisons Road and the Motorway, and Waterloo Road. Penalties to be imposed on Fulton Hogan and the drivers who breach these conditions.
- All trucks entering and leaving the site to use covers on their loads at all times
- All trucks to use a wheel wash before leaving the site.
- All activity on site to cease if wind gusts exceed 7 metres per second during dry weather
- All activity including truck movements to be conducted between 7am and 6pm on weekdays with no activity on weekends.
- All infill material to be inspected and independently tested for contaminants before use on the site
- A thorough explanation of the 'wash ponds' and how the company plans to prevent their contents from leaching into the water table.
- Quarterly spot visit site inspections to assure compliance with all imposed regulations to be taken without notice.
- Monthly testing of the water quality in the surrounding area