

From: [REDACTED]
To: [Hearings](#)
Cc: submissions@golder.co.nz
Subject: Notifications Consent Submission: Group 422
Date: Thursday, 6 June 2019 3:40:23 PM
Attachments: [Quarry-submission-v2.docx](#)

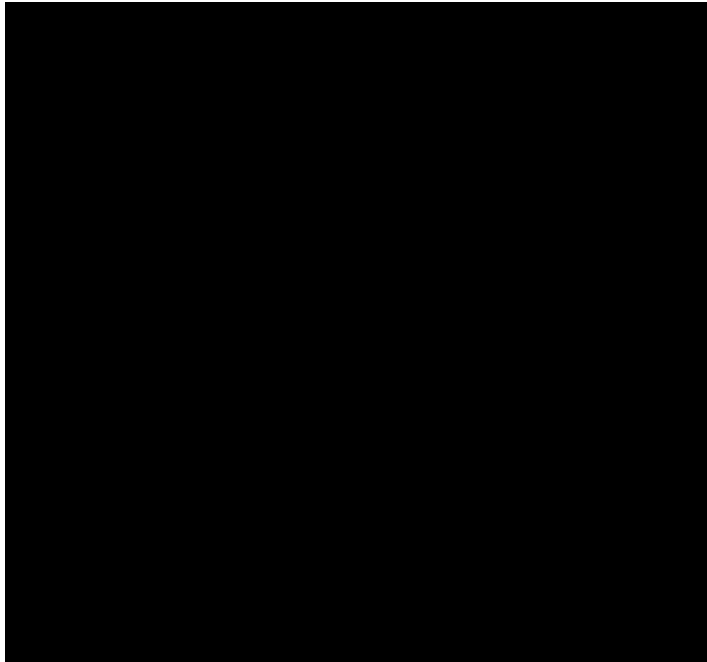
Group ID: 422

Consent name: Fulton Hogan - Roydon Quarry

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

Name: Dr Campbell Sheen

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 consider a joint hearing
 - CRC192409: oppose | WANT to be heard | WILL consider a joint hearing
 - CRC192410: oppose | WANT to be heard | WILL consider a joint hearing
 - CRC192411: oppose | WANT to be heard | WILL consider a joint hearing
 - CRC192412: oppose | WANT to be heard | WILL consider a joint hearing
 - CRC192413: oppose | WANT to be heard | WILL consider a joint hearing
 - CRC192414: oppose | WANT to be heard | WILL consider a joint hearing
 - RC185627: oppose | WANT to be heard | WILL consider a joint hearing
-

Reasons comment:

Please see attached document.

Consent comment:

Deny all applications in their entirety.

I oppose the following consents applied for by Fulton Hogan Ltd. in their entirety: CRC192408, CRC192409, CRC192410, CRC192411, CRC192412, CRC192413, CRC192414, CRC182422, RC185627.

My reason for opposing the applications in their entirety is that **the proposal will have more than minor effects on the environment and community and does not avoid, remedy, or mitigate these effects**. Specific concerns are addressed in the following paragraphs.

Need for this site:

The justification of the need for this site is based on self-selected criteria and assumptions that attempt to frame this as a site that provides for the public good. However, **it is obvious that this is simply a site that maximises the economic benefit to the applicant**. The economic analysis that underpins the supposed need for the proposed site contains unsubstantiated assertions, internal inconsistencies and methodological conveniences that make it unsound. The primary beneficiary of the proposed activities will be the applicant, whereas the negative environmental and economic effects of the proposed activities will be socialised onto the local community and landscape.

Visual effects:

The provided comparison of the visual effects of a quarry pit over a hard rock quarry are irrelevant. The relevant comparison is between the proposed activity and the current state. Drastically altering the topography of the area by bunding represents an unnatural landform in this area and impairs visual amenity in a way that is more than minor.

The visual effects of the view into the proposed quarry from the CSM2 overpass would be much more than minor. I dispute the applicant's argument that this will be short in duration and therefore the effect is minor, because it considers that duration is the only component of effect size, ignoring the large negative impact of the image of an open-cast mine adjacent to a small town. This image will be experienced by thousands of people per day and, for many people, that is the first thing they will see when they enter the Templeton community and Christchurch itself, further compounding the negative visual effects.

Traffic:

The volume of traffic proposed will have major negative noise, vibration and safety effects on the local community and environment.

The application proposes that 90% of outgoing traffic will use SH1. If this proves to be accurate, an additional 150 heavy vehicles per day will be added to local roads, which is a more than minor increase. If the analysis proves to be inaccurate or traffic patterns change substantially, it will mean even higher volumes of heavy vehicles on local roads.

The application is primarily concerned with outgoing traffic and its route, largely ignoring incoming traffic. Traffic coming to the proposed site will have as much, if not more, of an impact than traffic leaving the site. Large quarry truck and trailer units make more noise when empty because they are not weighed down by a load. Even if only half of the proposed 150 extra trucks per day are empty, this would still be a significant negative impact in terms of noise going past homes in Templeton.

Additionally, the applicant has no ability or incentive to control the movements of vehicles after they leave the proposed site or enforce their proposal to limit traffic through Templeton. As such, the proposal fails to avoid, remedy or mitigate the effects of vehicle movements through the community.

On several occasions, I have seen heavy quarry vehicles, including those operated by Fulton Hogan, illegally using the Kirk Road railway crossing in Templeton. If operators are willing to ignore traffic laws, it is completely unrealistic to expect that a code of conduct and a sign will control traffic from the proposed site.

Even if such a prohibition on traffic through Templeton could be enforced, it would simply serve to redirect heavy vehicle traffic down other local roads and so does not mitigate or avoid the effect, but simply moves it onto other community members, which is unacceptable.

The proposed roading improvements relate only to a short stretch of road immediately adjacent to the proposed site. However, local roads that are ill-suited for heavy vehicles would also experience a large increase in heavy vehicle traffic without any proposed safety improvements. Given that large vehicles are over-represented in serious crashes and the risk of severe injury or death resulting from crashes with large vehicles lies disproportionately with the occupants of small vehicles, the proposal to substantially increase the number of heavy vehicles on local roads represents an unacceptable risk to public safety, even with the proposal to introduce a roundabout at one intersection.

In addition, I have witnessed quarry trucks driving through Templeton with uncovered loads, in breach of current safety guidelines. In October 2018, a quarry truck spilled a number of large rocks across Railway Terrace in Templeton. These rocks were of a size that they would have killed a cyclist or motorcyclist on impact. I commute to work on a daily basis on my bike and am therefore particularly concerned about how the proposed increase in truck movements through Templeton will impact my safety as a vulnerable road user. The proposal makes no reference to the safety of cyclists in the area and it appears that the applicant has given no thought to this matter. I also have no faith in the ability or desire of Fulton Hogan to enforce driver behaviour given my own observations to date.

The application fails to note that there is a children's playground and sports field on Jones Road at the end of Globe Bay Drive. This area has only a low chain fence and is immediately adjacent to Jones Road (approximately 500 m from the proposed quarry site). While there is currently a risk that children could run from the playground and into the road, the proposal will significantly increase the risk of death and injury to children by increasing both the volume of passing traffic and the proportion of heavy vehicles, which are much more likely to cause significant injury. Further, the CCC have just released plans for a proposed sports complex and cemetery on the plot of land opposite the proposed quarry site. This will bring a large number of children to the area, making it even more imperative that heavy vehicle movements be eliminated from the area rather than increased.

The traffic modelling that predicts five vehicles per day would leave the quarry and drive down Jones Road into Templeton is inconsistent with my own observations. My kitchen window overlooks Jones Road in Templeton and I frequently see at least five quarry trucks before 8 am in the morning. The idea that this number would decrease with a quarry located nearby seems unrealistic.

The predicted noise effects of traffic are underrepresented, because community members will experience this as frequent, intense bursts of disturbing noise, rather than as an average increase in noise over an extended time period. The increased frequency of these noise spikes will have a much more than minor effect on me, my family and the community in general.

Working hours:

The proposed working hours that include 25 weeks of round the clock work per year to provide the applicant flexibility will create a burden on me, my family and the community for the convenience of the applicant.

Remediation:

There is a lack of specific information regarding the degree of backfilling that will be performed.

Monitoring:

The proposal to provide compiled data and/or reports at regular intervals is not sufficient to provide the community assurance of environmental compliance with conditions. Technology has advanced to a point that allows real-time, publicly available monitoring of traffic movements, on-site weather, dust levels, vibration and noise. This should be required.

The targeted location and limited number of monitoring sites is insufficient. Dust, noise and vibration should be monitored at regular intervals around the boundary of the site.

Dust:

The effects of dust being a "nuisance" rather than a health concern are in themselves more than minor.

The proposal to cease quarrying operations based on hourly average wind speeds is insufficient because a single gust of wind can transfer dust beyond the quarry boundaries.

The "dry weather conditions" that will cause quarry operations to cease are not defined.

Overall, I feel that the individual and cumulative negative effects of the proposed activity are more than minor, and that the application does not sufficiently avoid, remedy or mitigate these negative effects. I therefore request that the application in its entirety be denied.