

From: [REDACTED]
To: [Hearings](#)
Cc: submissions@golder.co.nz
Subject: Notifications Consent Submission: Group 422
Date: Thursday, 6 June 2019 12:22:15 PM
Attachments: [2019-F.Hogan-Quarry-Resposnse.pdf](#)

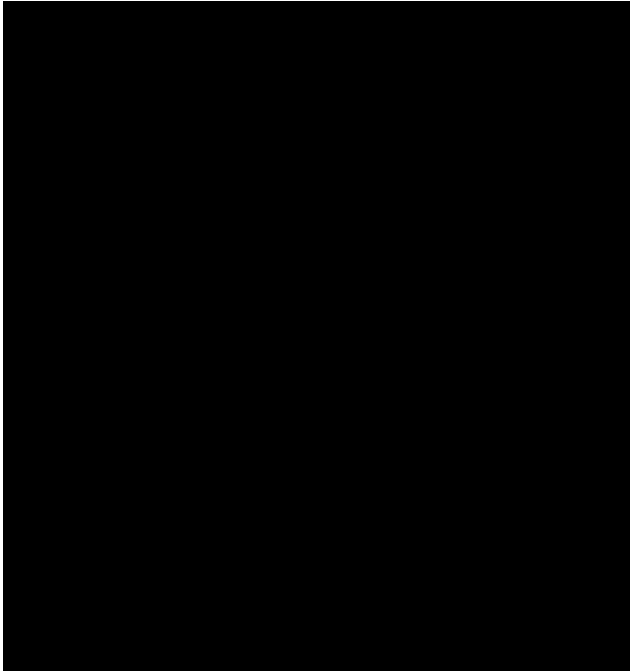
Group ID: 422

Consent name: Fulton Hogan - Roydon Quarry

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

Name: Stephen Talbot

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
-

Reasons comment:

A resident of Templeton who will be impacted by the proposed Fulton Hodan quarry. See attached information.

Consent comment:

Because for the breadth and nature of the risks and concerns this application for resources consent should be declined. If this proposed quarry inexcusably and shockingly reaches a benchmark for approval the following conditions must be imposed (refer attached document).

Dear Sir / Madam

I strongly object to the application made by Fulton Hogan (F.H) to establish and operate a quarry at 107 Dawsons Road and 220 Jones Road Templeton.

I make this objection as an affected resident living within 0.7km of the proposed Roydon Quarry. My family of four shifted to Templeton 4.5 years ago as a result of the amenity value of being on the rural / urban intersection. We chose Templeton as a result of the surrounding farmlands and green spaces (coming from a farming background), safe and quieter streets, and relocating away from air pollution that has been an issue with the Canterbury airsheds. This need to relocate was escalated as a result of a genetic lung conditions that is triggered by smoke, smog, and airborne irritants such as PM10 material which is a direct result of quarrying.

I will make reference to four key areas of concern but it is important to understand the cumulative effect of each concern for residents which results in both a decline in health, wellbeing and community economic well being. The cumulative effect of these issues will have a more than minor effect on myself and my family as residents and the wider district as a whole.

- **Dust and Air Pollution:**

It is widely accepted nationally, and internationally, that air pollution is a major health and safety issue. The health and safety requirements for companies and employees within environments where air pollution is present is growing and increasing significantly. In fact ECAN is extremely aware of the impacts of air pollution, especially PM10 pollutants, having created a programme to phase out older style wood burners, and more recently all wood burners except for ULEB's (Ultra Low Emission Burners) as a direct result of the concerns of PM10 air pollution in Christchurch and wider the Canterbury area. ECAN took this programme so seriously it had assessors driving the streets of Christchurch to determine if residents were using older style wood burners contributing to PM10 pollution, and also developed a pollution hotline for people to "dob" in the neighbours.

In information publicly available on ECAN's Facebook Page a graphic confirms that PM10 causes serious health issues including:

1. Irritation of the airways
2. Coughing
3. Difficulty breathing
4. REduced lung function
5. Aggravated asthma
6. Harm to the cardiovascular system.

In August of 2003 a Ministry for the Environment report titled 'Health Effects of PM10 in New Zealand' an Air Quality Technical Report No. 39 note the following:

Results show increases in mortality and other health effects are associated with increases in 24-hour average PM10 concentrations. The consistency and coherency of the studies have lead researchers to conclude that the effect is causal. The relationship appears to be linear and it appears that there is no threshold below which effects do not occur.

(page ix)

Furthermore Fulton Hogan note in relation to the Yaldhurst quarry monitoring programme:

*Overall, the results show there is no serious public health risk to Yaldhurst residents from airborne dust. **Nuisance dust levels will not cause long-term health effects, but we know it can cause irritation and symptoms of concern in some people...***"

This will be similar to the proposed Roydon quarry and nuisance dust is still **more than a minor effect**. It is clearly noted in scientific research readily available, that airborne pollutant dust, in any form, will cause risk to people. Just because it may not be a "serious public health risk" does not reduce the level of discomfort and health issues and therefore community economic wellbeing for those impacted (refer table).

In light of what ECAN is already aware of, and what science informs us, it is absurd that a quarry that produces PM10 dust pollution would be allowed so closely to residential dwellings (19m) and so close to a large community, let alone all the pollution caused by 1500 truck movements per 24 hour period.

Therefore this must proposed quarry must not be approved. The ongoing risk to residents health may not be known for some years and when that does happen the onus and responsibility will be on the heads of those who approved this quarry so close to residential homes and this is In spite of ECAN trying to mitigate PM10 in Christchurch. The following conditions needs to be imposed if for some reason this was deemed to be an appropriate activity so close to a strong community.

- a. A larger monitoring sample size being at least a year long monitoring programme needs to be conducted to provide the necessary information to make informed and robust decisions.¹ Numerous issues have been noted by others in relation to the the previous monitoring survey e.g. duration, time of year, reliability of monitoring stations proving this to be totally unreliable.

¹ Alistair Humphrey (CDHB) and Brett Aldrige (ECAN) 2017 Newstalk ZB interview.

- b. 24/7 dust mitigation on site at the Roydon Quarry e.g. Waterloo Development Park had this in place during their land development.
- c. That a minimum setback of 1000m from any residential dwelling be imposed as per previous submissions from The Canterbury District Health Board (minimum of 500m). They have advised if this cannot be achieved then the application should be declined.

- **Community Economic Well Being:**

Fulton Hogan address the Economic wellbeing of the wider community but refrain from developing the business advantage as this is not relevant for the RMA. I have numerous issues with the stated impact:

- a. The reduced costs of transport are a major driver for the location of this quarry. I would find it offensive if a strong reason for the council to approve this quarry is on reduced cost of supply when there is such strong opposition to the quarry from the community and the associated health and well being risks present.
- b. There is reference to reduced CO2 emissions as part of the economic well being, however this is not quantified and in fact there will be increased air pollution in a populated area.
- c. The reduced costs of supply are inferred but not guaranteed.
- d. There is no mention of the economic costs to the community.
- e. Lastly, and most importantly there is a significant community economic impact as a result of increased traffic.

- **District Plan Review and Proposed Future Development.**

The proposed F.H quarry application seems at odds with the both the District Plan review and the proposed activities alongside it.

1. Recently the Selwyn District Plan has gone under review with significant public consultation and quarrying activities and setbacks was a key part. It would be remiss of the those assessing this application to not have an eye for the future.
2. It is vital to note that this proposed quarry will be at odds with and compromise proposed future development and land use around Templeton.

- **Amenity Value**

As noted the Amenity value was a key decision in relocating to Templeton. Under the Resource Management Act this means those

‘natural or physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes’.

My family places a high value on protecting the area from any activity that would impact the amenity value. In spite of any proposed ‘mitigation factors’ the wonderful Amenity Value of the area will be altered significantly.

It would take a very strong willed person to stand on the argument that a 24 hour/7 day week quarry in operation would not impact this Amenity Value. The natural physical qualities and characteristics of this area that will be affected:

- a. **Visual landscape.**
- b. **Nuisance dust and hazardous dust**
- c. **Noise pollution** generated by earthworks and quarrying activities will have significant impact.²
- d. **Recreational activities** will be impacted such as the regular country walks and bike riding due the increased level of traffic generated (**1500** truck movements a day)
- e. **Safe Driving Conditions** recently fought for will be impacted.

It seems there is no mitigation that will prevent a loss of Amenity Value for either visitor or tourist to Christchurch not local resident.

² Please note this will impact sleep and therefore health and there the community economic well being.

Summary

These are the four key areas that have a more than minor impact and in some cases there are major impacts. These issues do dovetail with a number of other issues that are of concern as below.

- Traffic impact
- ECAN and Council monitoring capabilities
- Setback concerns from residential dwellings.
- Operational periods that are substantial and are of a key concern to Amenity Value and mental health.
- Water issues for residents and further afield.

Because for the breadth and nature of the risks and concerns this application for resource consent should be declined.

If this proposed quarry inexcusably and shockingly reaches a benchmark for approval the following conditions must be imposed:

1. A delay on activation until a larger monitoring sample size being at least a year long monitoring programme is undertaken and the results assessed by CDHB and correct assessors.
2. 24/7 dust mitigation on site at the Roydon Quarry on all areas within 1000m of a residential dwelling or the quarry boundary.
3. Automatic dust monitors with live data available 24hrs/7days a week online that is provided and paid for by Fulton Hogan
4. Allowances for only fixed crusher units to be used with a 1000m setback from all residential dwellings and the boundary.
5. That a minimum setback of 1000m from boundaries be imposed in effect creating a green belt around the perimeter of the quarry
6. A reduction in operational hours to 7am -6pm weekdays to allow for Amenity Value to still be preserved somewhat. No activity on public holidays to be allowed.
7. In relation to the above no more than 605 vehicle movements (per day) with no possible increased over time.
8. Absolutely no truck movements through Templeton especially through the Jones Rd - Railway Terrace road. There needs to be no tolerance level here.
9. A monthly review of all road conditions alongside the proposed quarry including immediate rectification..

10. Full remediation plans agreed to prior to aggregate being excavated, and remediated with adherence to final plan as soon as practicably possible. .
11. Water quality monitoring at near by wells/bores.
12. A compliance officer available on call 24/7 is to be made available to be available to investigate complaints in a timely manner/monitor their activity to ensure adherence to consent conditions. This is to be paid for by Fulton Hogan.