

CON520: SUBMISSION ON RESOURCE CONSENT APPLICATION

(SECTION 96 RESOURCE MANAGEMENT ACT 1991)

TO: Consents Hearings
Environment Canterbury
P O Box 345
CHRISTCHURCH 8140

Email: hearings@ecan.govt.nz
Ph: (03) 353 9007 Fax: (03) 365 3194

OR: submit by completing an on-line form at:

<https://www.ecan.govt.nz/do-it-online/resource-consents/notifications-and-submissions/notified-consents/>.

FOR OFFICE USE ONLY

FILE: CRC192408, CRC192409, CRC192410,
CRC192411, CRC192412, CRC192413,
CRC192414, RC185627

Closing Date: **5.00pm Thursday 6 June 2019**

Person(s) /Group /Organisation Making the Submission

Full Name of Submitter(s): James (Jim) Oliver Turpin

Postal Address For Service

Contact Phone No(s):

Fax/Email:

Please tick this box if you do not want to receive any communication via email

Contact Person:

Jim Turpin

Name of applicant: Fulton Hogan Limited

Applications to Environment Canterbury

All of the applications as listed below OR only those as ticked.

- tick
- 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

I / We support the application

I / We oppose the application

I / We are neutral to the application
(neither support or oppose)

I / We **do** wish to be heard in support of my/our submission*

(Note: this means you wish to speak in support of your submission at the hearing)

*If others make a similar submission, I will consider presenting a joint case with them at the hearing Yes No

Application to Selwyn District Council

tick RC185627 Land use for gravel extraction and processes

I / We support the application

I / We oppose the application

I / We are neutral to the application
(neither support or oppose)

I / We **do** wish to be heard in support of my/our submission*

(Note: this means you wish to speak in support of your submission at the hearing)

*If others make a similar submission, I will consider presenting a joint case with them at the hearing Yes No

2. The reasons for making my submission are: *(state in summary the nature of your submission, giving reasons)*

This is a pro forma submission awaiting determination of ENV-2016-CHC-59 now before the Environment Court. _____

ENV-2016-CHC-59 is between Selwyn Quarries Limited (SQL) (Appellant) and Environment Canterbury (CRC) and Others (Respondent). _____

Briefly, SQL in 2015 was issued a variation Consent 145090 Decision 145693 by Selwyn District Council (SDC) to mine below the highest recorded groundwater level. _____

This along with applications from about 6 other Company's representing about 10 individual quarries was publicly notified and heard by three Commissioners (CRC155169) in lengthy hearings during 2016. SDC did not appear but the CHCH City Council (CCC) did. The Commissioners found strongly against all applicants including SQL and both CRC and CCC subsequently declined all the applications. _____

SQL appealed (no public notification), CRC changed their mind and now both (CCC did not appear) want to issue a land use consent (CRC155169) and a discharge permit (CRC183628). This is currently being challenged by a S274 party (me) on the basis not everything in the appeal notice was attended to, it has not been established there is no potential risk to the Public for all of the next 35 years at least, there is no economic benefit to the Public and that CRC has not properly attended to its RMA obligations to the Wider Community. _____

It is my fervent belief if this appeal is allowed it will through a precedent effect have serious and substantial effect on medium to long term outcomes compared to what's being proposed for these submissions now. _____

Please attach additional pages if required

3. I wish the consent authority to make the following decision: *(give details, including the general nature of any conditions sought)*

If Appeal fails, I will take no further part. _____

If Appeal succeeds or is not decided I will seek an assurance that Fulton Hogan will never ever apply to go deeper.

Please attach additional pages if required

5. I/We ~~am / am not~~ a trade competitor for the purposes of section 308B of the Resource Management Act 1991. I /We ~~am / am not~~ directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment;

Jim Turpin

Signature of submitter or duly authorised agent on behalf of submitter

Date 26 / 5 / 2019

Notes to the submitter:

1. The person making this submission must send a copy to the applicant as soon as reasonably practicable after serving Environment Canterbury
2. A list of all submissions received will be provided to the applicant.
3. Please be aware that third parties may request a copy of submissions received and that request is subject to the Local Government Official Information and Meetings Act 1987.

The address for service of the applicant is:

Fulton Hogan Limited
c/- Golder Associates
PO Box 2281
Christchurch 8041
Attn: Kevin Bligh / Geoff England

Email: submissions@golder.co.nz