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) 363 9007    Fax: (03) 365 3164

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

Closing Date: 5.00pm Thursday 6 June 2019

Person(s)/Group/Organisation Making the Submission

Full Name of Submitter(s):
James & Sandra Curtin

Postal Address For Service:
Fulton Hogan Limited
620 Onehunga Mall, Onehunga, Auckland

Contact Person:
Sandra (Sandy) Curtin

Name of applicant: Fulton Hogan Limited

Applications to Environment Canterbury

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

☐ CRC192408 Land use to excavate material
☐ CRC192409 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

☐ 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

OR

☐ I / We do not wish to be heard in support of my/our submission
(Note: this means that you cannot speak at the hearing, however you will retain your right to appeal any decision to the Environment Court on any decision made by the Council.)
Application to Selwyn District Council

☑ 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

☐ I / We do not wish to be heard in support of my/our submission
(Note: this means that you cannot speak at the hearing, however you will retain your right to appeal any decision to
the Environment Court on any decision made by the Council.)

OR

☐ I / We do not wish to be heard in support of my/our submission
(Note: this means that you cannot speak at the hearing, however you will retain your right to appeal any decision to
the Environment Court on any decision made by the Council.)

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

Please refer to attached submission

Please refer to attached letter to Fulton Hogan
13/3/2018

Please refer to attached letter from Fulton Hogan
27/3/2018

Please refer to attached letter from Harness Racing NZ 23/5/2019

Attached google maps showing Dawsons Rd property

Attached graphic from bike 17/4/2018

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)

Please refer to submission

Please attach additional pages if required
5. I am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991. I am not directly affected by an effect of the subject matter of the submission that (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Signature of submitter or duly authorised agent on behalf of submitter

Date 4/6/2019

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/o Golder Associates
PO Box 2281
Christchurch 8041
Attn: Kevin Bligh / Geoff England

Email: submissions@golder.co.nz
We wish to object to the proposed Roydon Quarry on the Dawsons Road, Jones Road corner for the following reasons:

Who are we:

Jim and Sandi Curtin live at 211 Dawsons Road, and also own the property of 229 Dawsons Rd which has the home of our Mother Elizabeth Curtin and our Harness Racing training stables.

Jim and his late father Reg Curtin have been a public trainers from this property since 1965.

Jim currently works a team of 18 horses and employs his wife Sandi and brother Rodger Curtin.

Jim is a professionally licenced trainer who has been training since 1985 with 285 wins to date. He has been inducted into the NZ Trotting Hall of Fame.

Barry Crothers leases stables on the property and currently has one horse in training

What do we value about Dawsons Rd:

Dawsons Rd has always been a very quiet road and we have trained without incident due to traffic since 1965.

Our location is central to racetracks throughout the Canterbury area.

Over the years our track has been developed to the racetrack that it is today.

Our track is used to train approximately 18 race horses, 7 days a week. Horses are generally worked on our track from 5.30am to 11.00am each day. The track is also used by outside trainers and bloodstock agents to trial horses for sale to Australia and America. Due to the size of our track, it is commensurate with the smaller racing tracks in Australia, and as such NZ bloodstock agents send horses to our property, for trialling, to ensure that they can run at top speed round our track, and make sure they are suited to have a successful race career overseas.

What are our concerns:

The training track on this property has been in use since 1965. Please refer to the attached google map which indicates the location of our track to Dawsons Road, running parallel for at least 150 metres, 7 metres from the road.
Our great concern is that the large truck and trailer units on our road will cause our horses to shy with the potential to crash to the track or go over the fence, causing injury or death to both horse and driver. We feel this is only a matter of when not if.

Fulton Hogan have indicated that 30% of their traffic will NOT be going directly onto State highway one, and have indicated the strong likelihood that it will travel on roads around our district. This is approximately 450 vehicle movements per day. Dawsons Rd is the direct link to West Coast Road from the quarry. Fulton Hogan have since said they anticipate only 5 trucks per day as “they will tell the drivers not to use our road”. (please refer to Fulton Hogan letter dated 27 March 2018)

In December 2018 Kirk Road in Templeton was closed due to sewer works being carried out. This meant that a substantial amount of traffic was diverted down our road. We had Michael McGrath, Traffic Manager of SIEPP on site and he was quite alarmed at the problem the traffic was causing us trying to work our horses. SIEPP had 50km signs erected to help alleviate the problem of traffic speeding past at 100km per hour.

These works have now been completed and we are now back to our quiet road. 80km per hour traffic signs have been erected on our stretch of road permanently.

Our business currently supports 4 different families. If we were forced to cease trading, where do we go from here? Jim has spent his entire life working on the property. At 59 he does not know any other type of job. Our staff would lose their jobs, through no fault of theirs or ours. Our many owners entrust us with the care of their horses, and if the quarry goes ahead we will not be able to guarantee their safety. Which in turn will result in us losing our horses when owners seek safer training facilities.

We are concerned that the noise and vibration of empty truck and trailer units passing our property will be very scary to our animals. They only need one loud bang to take fright. Due to the closeness of our track to the road and being fenced there is only one way to go and that is over the fence.

What do we want:

We do not want the Roydon Quarry to go ahead. The danger of the trucks to our business means that we may have to cease operating.

If the Roydon Quarry is approved I want the following traffic conditions:
Traffic 19) Heavy vehicle movements shall not exceed a maximum of 5 movements per day.

For the avoidance of doubt, this would equate to 10 trucks in and out of the site in a day.

The following shall apply with respect to heavy vehicle movements through Dawsons Road:

a. Fulton Hogan controlled trucks will only travel on Dawsons Road if a delivery is in the immediate vicinity of Dawsons Rd.

b. Fulton Hogan will require any non FH-controlled truck drivers accessing the site to sign on to a code of practice committing to the same.

c. A prominent sign will be established inside the quarry gate reminding drivers not to travel down Dawsons Rd unless a delivery is in the immediate vicinity.

d. The site induction shall include a section on truck route options to and from the site and specifically address point (b) above.
13 March 2018

Mr Don Chittock
Fulton Hogan

Chch.quarry@fultonhogan.com

Dear Don,

Further to the meeting at our property at 211 Dawsons Rd Templeton, on 23 January 2018, we wish to express in writing our concerns that were expressed at the time, and also provide some further information.

As we understand Fulton Hogan intends to quarry 170 hectares of land bordering Dawsons and Jones Roads, for a period of 40 years. The current quarry on Pound Road has approximately 1500 vehicle movements per day. It is anticipated that this quarry will be closed and the Dawsons Road quarry will be fully operational. It is envisaged that 70% of the 1500 traffic movements will be directed onto the main highways, with the remaining 30% using rural roads. This 30% would be approximately 450 vehicle movements per day. Curraghs Road or Dawsons Road will more than likely be used to transport aggregate to your processing site at Miners Road.

For 55 years the Curtin family have trained Harness Racing horses at their establishment on Dawsons Road. The training track is directly adjacent to the road, with one of the main straights running parallel and within seven metres of Dawsons Rd.
As discussed with you on your visit to our premises, it was very easy to establish that training horses on our track, with 450 trucks passing per day it is a disaster waiting to happen. With the proximity of the track to the roadside, it would only be a matter of time before there was a serious accident resulting in either serious injury or death to a drivers or horse.

You suggested that we could possibly plant trees to screen the road, but as you also quite quickly realised, this was impossible due to the closeness of the track to the road, and as stated above it does run directly along our boundary.

If there were to be at least 450 vehicle movements a day on the roads surrounding our property, our business would be finished. Our livelihood would be taken away from us. We have had discussions with the Darrin Williams, Racing Manager and Health and Safety Officer at Harness Racing New Zealand. He has expressed his concern that we would be endangering the lives of both staff and animal if we were to continue using our track and that is not a risk we are willing to take.

We have also had discussions with John Denton, Harness Racing New Zealand Venue and Track Inspector. He has also indicated that our track would not be able to be used for training our race horses. We have looked into the option of relocating our track elsewhere on our property, but have been advised that the cost would be exorbitant and not something we are financially able to do.

Our track is used to train approximately 20 race horses, 7 days a week. Horses are generally worked on our track from 5.30am to 11.00am each day. The track is also used by outside trainers and bloodstock agents to trial horses for sale to Australia and America. Due to the size of our track, it is commensurate with the smaller racing tracks in Australia, and as such NZ bloodstock agents send horses to our property to ensure that they can run at top speed round our track, and make sure they are suited to have a successful race career overseas.

Our business currently supports 4 different families. If we were forced to cease trading, where do we go from here? Jim has spent his entire life working on the property. At 58 he does not know any other type of job. Our staff would lose their jobs, through no fault of theirs or ours. Our many owners entrust us with the care of their horses, and if the quarry goes ahead we will not be able to guarantee their safety. Which in turn will result in us losing our horses when owners seek safer training facilities.
I have not even touched on the subject of silica dust, and how this will affect the breathing of our horses. It is currently being researched by other interested parties, and the information I have received to date is very distressing.

We are finding the uncertainty of our future very unsettling. It is a very stressful time. The Templeton Community is fighting this quarry as hard as they can. From the discussions, meetings being held, and communications being circulated, it is great to see we have their support.

Don, we did appreciate you taking the time to come and meet with us, but our concern is mounting and we feel that it is falling on deaf ears.

Yours faithfully

Jim and Sandi Curtin
27 March 2018

211 Dawsons Road
Templeton
Christchurch 7678
curtv@xtra.co.nz

Dear Sandi and Jim,

Thank you for your time on 23 January 2018 and your letter of 13 March 2018. It is important to us to hear neighbours’ concerns about our proposed quarry project.

As discussed when we met, the Dawsons Road site is to be a direct replacement of our current Pound Road Quarry, which has operated for decades and is located between the Hei Hei, Islington and Templeton communities.

As we plan for the establishment of the new site at Dawsons Road our aim is to make sure that we have the right sized infrastructure, services and measures in place.

Fulton Hogan is yet to receive its technical transport measurement and monitoring advice, but believes at this stage that the entry and exit will be located off Jones Road, as this provides the closest access to the Southern Motorway and Main South Road. We expect over 70% of the heavy vehicles to use the main arterial/motorway and we will work with the roading authorities who will ultimately define the traffic management requirements for the site.

Currently we do not have high aggregate volumes and movements between our sites – so we do not see this bringing an increase in trucks on the local roads. If we do need to move aggregate between sites with our own fleet we can direct the route they will or won’t take.

Dust monitoring

In terms of dust, Fulton Hogan is participating in the Yaldhurst, and wider area, Dust Monitoring programme on the PM10 and Respirable Crystalline Silica led by Environment Canterbury (supported by Christchurch City Council and Canterbury District Health Board) and we await the results due in July 2018. We are focused on establishing a site that has modern management, with mitigation and suppression measures in place for noise, dust and water.

From our conversations with people in the community we have heard that visual and amenity aspects of the area and use of the land is very important. You may have noticed that we are re-fencing the boundaries of Dawsons and Jones Roads and intend to start planting trees and shrubs this autumn – as we have done at other quarry sites. The property will continue to operate as a farm and operate to regional land and water regulations. If we are successful with the quarry consent, the site will be progressively extracted with only a maximum of 40 hectares (or less) of the site open at any one time with the remainder of the land continuing to be farmed to regional regulations and rules.
New drop-in centre

In the next month we plan to open a drop-in centre, on what was the old Roydon Stud site, where we want to continue the conversations with neighbours, other local residents and stakeholders.

The centre will provide information on quarrying and extraction (current and historic), background on Fulton Hogan and the company's activities, and more information about our Dawsons Road proposal. It will also provide a venue for people to share their views with us.

Thanks again for your letter and I trust that the information I have provided addresses your concerns.

Regards,

Don Chitlock
23 May 2019

Selwyn District Council, Environment Canterbury

Re: Proposed Roydon Quarry

To whom it may concern,

I am writing in support of Jim Curtin, a licensed horse trainer & driver and an inductee to the NZ Trotting Hall of Fame, in respect to his submission opposing allowing Fulton Hogan to operate the proposed Roydon Quarry in close vicinity of his training establishment.

The Curtin family have trained at their property at 229 Dawsons Road continuously since 1965. In this time, they have been exemplary members of the harness racing community and made a significant contribution to the ongoing success of our sport. They currently work a team of 18 horses, employ local residents and sub-lease stables to another trainer. It is exactly these sort of operations that our sport needs to be successful. Without horses we don’t have an industry and thus we are very concerned about what the proposed volume of truck movements would mean to the prospects of Mr Curtin being able to continue to train on his property.

Animal welfare is a priority for our sport so we are very concerned indeed about the effect on horses from a huge rise in truck movements in the area – these are animals, not machines. The risk of them shying, and potentially injuring themselves or people working with them, due to noise/vibrations caused by large truck & trailer units should be taken seriously – it is not overstating the case to say that the Curtin’s livelihood will be put at risk should the quarry be allowed to go ahead. There will be wider impact on the sport of harness racing, which is a significant contributor to the economy of the Selwyn District and the wider Canterbury region.

For avoidance of doubt, it is our view that the proposed Roydon Quarry should not be given consent to operate on the basis that is currently proposed.

Yours faithfully

Peter Jensen
CHIEF EXECUTIVE
Executive Summary

Proposed Development

Fulton Hogan propose to develop a quarry to the west of Templeton. The quarry is expected to provide a long-term source of aggregate to service the greater Christchurch area. It is intended to allow a continuation of supply for Fulton Hogan in the area.

The quarry site is located in the Selwyn District, north of Jones Road, between Dawsons Road and Curraghs Road, and covers approximately 170ha of Rural Inner Plains zoned land. The proposed operations include quarrying, crushing, screening and stockpiling of aggregate, and transportation of processed aggregate from the site.

The maximum daily heavy vehicle traffic generation at the gate is proposed to be set at 1,500 heavy vehicle movements per day (vpd). Based on traffic generation patterns at the nearby Fulton Hogan Pound Road quarry, the typical heavy traffic generation will be a lot lower than the maximum day. It is forecast that the median operational day will generate approximately 1,050 vpd on a median operational day.

Transport Environment

The site is located close to the Main South Road, which forms part of the strategic road, State Highway 1 (SH1), which carries approximately 25,000 vpd. It has a primary role of moving high volumes of traffic, including freight and heavy vehicles.

![Map of the area showing road network and locations](image)

Figure 1-1: Road Network (NZTA Classification)

The State Highway network is currently being improved through the construction of the Christchurch Southern Motorway Stage 2 (CSM2) which will provide a motorway standard road from Rolleston to Christchurch. It will significantly reduce traffic volumes on Main South Road, reduce some of the existing pressure on the road network through Hornby, and improve network travel times. As part of the CSM2 project, the Main South Road / Dawsons Road intersection will be upgraded to a roundabout which will improve access onto and across Main South Road.

Jones Road and Dawsons Road are adjacent to the site. Jones Road currently provides a supplementary east-west route, and carries approximately 3,000 vpd. Dawsons Road is one of several north-south routes,