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:

Closing Date: 5.00pm Thursday 6 June 2019

Person(s) / Group / Organisation Making the Submission

Full Name of Submitter(s): JOHN & JILL HARTNELL

Postal Address: 

Contact Phone: 

Fax/Email: 

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

Contact Person: JOHN HARTNELL

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
( 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

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

☐ RC185627Land 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

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)

AS A LOCAL RESIDENT, RESIDING WITHIN 1000 METRES OF THE PROPOSED QUARRY, I HAVE GRAVE CONCERNS ABOUT THE PROPOSED DEVELOPMENT, ITS IMPACT ON THE WELL BEING OF THE COMMUNITY, BOTH RESIDENTIAL AND LIFESTYLE, AND THE IMPACT ON LOCAL BUSINESSES. THE POSITIONING OF THE QUARRY IN WHAT CAN ONLY BE DESCRIBED AS A LOW TO MEDIUM DENSITY POPULATION AREA BORDERING CHRISTCHURCH CITY RAISES SERIOUS CONCERNS. IT MUST BE ACKNOWLEDGED THAT THE CITY IS SPREADING SOUTH AND THE TRACKS OF LAND BORDERING THE MAIN ARTERIAL ROUTE SOUTH TO ROLLESTON MUST ULTIMATELY AND SENSIBLY BE USED FOR RESIDENTIAL DEVELOPMENT, NOT TO DIG A SUBSTANTIAL HOLE IN THE GROUND WHICH WILL TAKE AT LEAST 120 YEARS TO BACKFILL AT BEST BASED ON CURRENT QUARRY PERFORMANCE.

Aligned with these concerns are issues relating to environmental health, roading and transport, human safety, business and personal impact.

The submission attached outlines these key points in more detail.
3. I wish the consent authority to make the following decision: *(give details, including the general nature of any conditions sought)*

**TO DECLINE THE APPLICATION ON THE GROUNDS THAT THE PERCEIVED BENEFITS BEING**

**PROMOTED BY THE APPLICANT ARE ENORMOUSLY OVERSHADOWED BY THE COST TO**

**THE COMMUNITY, ENVIRONMENTAL HEALTH, HUMAN SAFETY AND THE MISUSE OF A**

**A VALUABLE PIECE OF LAND SO CLOSE TO THE CITY OF CHRISTCHURCH.**
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; 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 4/6/19]

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 such requests are 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
31 May 2019

SUBMISSION on resource consent application.

Applicant: Fulton Hogan Ltd

Application: Resource Consent (Section 96 Resource Management Act 1991)

Site: Dawsons Road Quarry

The submitters, John and Jill Hartnell are firmly opposed to the Resource Consent Applications from Fulton Hogan Ltd, for the proposed quarry sited in the Selwyn District covering the land area bounded by the Curraghs Road, Dawsons Road, Madisons Road and Jones Road.

As a resident living within 750 metres of the proposed site, we have grave concerns about the impact this proposed quarry will have on the residents of the Templeton and Weedons community; these concerns are outlined in detail below.

1. Transport – Roading, Traffic and Human Safety

The applicant has advised that their expectation is up to 1500 truck movements in and out of the site per day, or 125 per hour over a 12 hour day – this is one movement every 30 seconds.

This equates to 750 car equivalents per hour (SDC information) entering and exiting a maximum of two gateways, off Jones Road or Dawsons Road. Then either turning left down Dawsons Road heading west or turning right linking with the Main South Road to head North or South.

This level of traffic movement is unprecedented, roading infrastructure will be compromised, road width is insufficient, vibration, vehicle noise from exhaust brakes and traffic density pose a substantial risk to residents, visitors and existing businesses.

Also of note is the main train line, which intersects access to the Main South Road, this is another risk factor that must be taken into account.

Human Safety Impact - these daily volumes present considerable risk to residents, tourists and contractors who use these roads on a daily basis. Large truck and trailer units operating at speed with heavy loads are a serious safety risk, particularly as the
roads are already carrying substantial traffic during daylight hours, and are not
designed for large vehicles use. Many residents use these roads for walking and
cycling, this would not continue and the opportunity would be lost as the potential for
a serious accident is real and would be too great for those undertaking these activities.

**Business Impact** – high traffic movement of large trucks and trailers presents a
number of challenges for local businesses, in particular the harness racing industry
which has a substantial presence in the site vicinity. High traffic movement creates
loud noises (exhaust brakes and rattle), delivering animal fright and serious risk of
injury to both the animal and the handler/driver. The training of young horses using
existing track facilities operating along the road edge (Curraghs & Dawsons) would
become impossible, thereby disrupting if not halting these businesses.

**Traffic volume** will also impact feed, livestock deliveries and livestock collection on
the Chicken Broiler Industry where farms are present on Dawsons, Madisons and the
Main South Road all within 2000 metres of the proposed quarry site. Site access for
the large vehicles currently used is already challenging, adding the task of exiting on
to high volume traffic flow predominately made up of quarry vehicles will increase
the potential risk of accidents and near misses for all parties.

I note that FH have advised that for every 4 truckloads of quarry material removed
from the proposed quarry site, only 1 truck load of “clean” fill is returned. On this
basis proceeding with this quarry will mean heavy traffic volume will continue on this
site for 120 years, 40 of intense traffic to strip the quarry fill and a further 80 plus
years of lessor traffic impact to return it back to a usable land site for future
development.

2. Water – flow/table, well use, water take, discharge, wash-down water storage, water
races, storm water, dust mitigation, leaching.

The **water table** sitting below the proposed site is relatively high, original FH
excavation plans/discussions suggested a quarry depth of 12 to 15 metres below the
existing land surface level, this it would appear has been pared back to a maximum of
9.9 metres which strongly indicates there is serious potential to interfere with the
natural water table applicable to the area and thereby impacting all water use on the
downstream side of the proposed quarry site.

All properties in the vicinity of the proposed quarry use water from **individual** (36
within 500 Metres) or **scheme/community wells** (580 metres immediately
downgradient) for human and livestock stock consumption. Disruption of the water
table through quarry activity will impact the water quality as was witnesses in the
September 2010 earthquake where all wells in the area had to be pumped clean over a
number of hours and holding tanks emptied before satisfactory water quality was re-
established. This was one event, not 40 years of ongoing quarrying activity, any
mistake at quarry level will hugely impact water quality, this is an unacceptable
outcome. We must question also the potential risk to human health from contaminated
water, though I cannot quantify this at present.
Water take – I understand the water take will be boosted by transferring rights from another site, what is not clear is how much water will be required to run the quarry and what potential impact this may have to all affected parties.

Wash-down water – it is assumed the use of ponds to collect aggregate wash-down will be required, what specifications .. size, depth, potential to leach in to the aquifer – this requires absolute clarity so that risk assessment can be accurately made.

Water races – these are purpose built for stock water, there is no logic in applicant having rights to take such water unless it is solely for stock use and will not be contaminated.

Storm water and hard stand run off is another issue that needs to be addressed, the potential for contaminants to enter the unconfined water aquifers immediately below the quarry are real, the stripping back of the natural filters, being top soil, clay and gravel to a minimum depth of 10 metres means contamination risk is dramatically increased. How will this be mitigated, what is proposed to manage this?

Dust mitigation – the quarry industry uses water as its only tool to mitigate dust. The performance of the quarry industry on this matter clearly shows that this is a fail. The north/northwest wind is the prevailing wind direction in Canterbury. The wind directional work undertaken by FH clearly supports this and provides a clear indication of the impact of poor dust mitigation on downwind properties. In this instance I will only address the use of water, and the question of where this potentially contaminated water ends up - in principle the same place as the storm water, in our water aquifers, further compounding our highly regarded the water quality – again how will this be mitigated, if at all.

Further question – how does the applicant propose to mitigate dust issues being brought to the proposed quarry site in the form of “clean” fill? This will potentially roll out for 120 years. What is clean fill – rubble, materials contaminated with other materials, asbestos for example, is it acceptable that vehicles carrying such material could potentially drive through areas such as the Templeton residential area on a daily basis inadvertently spreading “dust” on people, their homes and gardens??

Leaching and “clean” fill, while concerns in this submission have already touched on the disruption of the water table and the matter of storm water and dust mitigation we must also address the serious issue of leaching from fill deposited on the site to repatriate the land. With a high water table, unqualified and questionable material (fill) deposited very close to the water table, water dust suppression run-off, rain and storm water run-off all add up to real and serious risks to the downstream water quality we currently enjoy. I believe mitigation is not possible.

Other potential leaching issues that need to be recognised are on-site staff amenity and truck washing.

If leaching and other contamination issues are found, what action will be taken and how will appropriate remedy be imposed??....is the risk greater than the reward.

3. Clean Fill – management, criteria/determination, testing/training and risk mitigation.
There are many concerns about “Clean-fill” management, how this will be monitored, who has the say and on what grounds will fill be accepted or declined. Frankly visual inspection will simply turn in to a shame, over time standards will be relaxed, individuals holding responsibility will move on, and risk will heighten.

Things to consider when understanding potential load make-up and risk are –

Untreated & treated wood
Plaster board and MDF materials
Asbestos
Metals
Concrete matter – uncured and liquid wash-water
Vegetation

Will this be screened before final placement in the pit – some serious questions need to be answered.

4. Site rehabilitation – quarrying activities strip the top soil from the designated area (up to 40 hectares at a time).

Traditionally this is quality soil and it is sold thereby removing any opportunity to put like soil back as part of the rehabilitation programme. Not only does soil removal increase dramatically the potential for microbial, hydrocarbon and heavy metal contamination of the aquifers, it places severe challenges on land use following land fill rehabilitation as soil depth and quality, particularly in the area within the Curraghs & Madisons Road proximity is of high quality and will potentially be lost forever.

As a mandatory condition, should the quarry proceed, no topsoil should be removed from the site; it must be retained for the rehabilitation process under a strict management plan.

As further mandatory condition must be imposed, should the quarry proceed, and that is the rehabilitated site must be returned to the same ground level as the original site pre quarry activity. It is unacceptable to strip a large track of land bordering the Christchurch City boundary and on a main arterial route and leave an unsightly hole in the ground that will have limited use opportunity, on what should be a residential or small section lifestyle subdivision.

We must ask is it better to have people in accommodation close to Christchurch, its amenities, sports and recreation with existing transport and services or allow a hole in the ground and push people further out, creating the need for greater infrastructure investment and cost, with the only beneficiary being Fulton Hogan who will be tasked with building the new roading etc, this is a serious question that deserves serious consideration – there is only one logical answer.


It is difficult to access this however logic says that the current amenity value will be impacted, quarrying activity generates considerable noise this is not in question,
therefore with residences within 200 metres of the proposed quarry boundary, they will be impacted, particularly those who sit on the downwind sides of the quarry, in particular – Northeast, Northwest and Southwest winds.

While bund and tree planting will assist to reduce sound, this is not going to happen overnight, particularly the trees, which provide some relief from dust as they act as a dust filter as well.

Things to consider -

Plant operation, crushing and washing noise

Truck loading, stone on metal, large truck engines etc

Loader operation, reversing siren, large engine noises etc

Truck movement etc

Depending on operational hours this noise will be real and will impact on residential and lifestyle blocks within 1000 metres of the proposed quarry boundary. What is deemed acceptable, up to 1500 truck movements a day will generate huge activity and substantial noise with the operation and the surrounding road access.

Question – when will the bund be formed, what material will be used and where will the material come from. If the top soil is used it will be lost for a lengthy period of time and rehabilitation will be impacted for many years.

6. Amenity values – we must question the logic of turning rural farmland with 650 metres of a residential community and its amenity values, in to a large hole in the ground that the applicant is not proposing to rehabilitate back to its original state. The people of Christchurch, Selwyn and the local communities deserve better.

While a subject that sits to one side of the submission process I believe we must also recognise the financial and economic impact that community members now face. No better example of the financial impact than the loss of value on people’s homes and property. A quarry next door will reduce the value of people’s life time investments and in some cases make them unsaleable, do we put a quarry in front of the wellbeing and the financial security of the community.

As an example, within a short period after FH secured the existing land holdings they instructed a real estate agent to make an offer on two key adjoining blocks of land. It is interesting to note that the offer was substantially under rateable valuation and could only be deemed as irresponsibly low, in fact you would describe this as an open admission by FH that there proposed activity had devalued the property by 25%.

Financial responsibility does not stop with the FH Board in this instance, the lives and livelihoods of many people will be impacted by a decision to proceed. It is a timely reminder to those who sit at the FH, Christchurch City and Selwyn District Council governance tables that profits should not be put before people and the health and wellbeing of the community directly impacted. It is time to act responsibly.
7. Dust – there has been much publicity regarding the environmental impact of quarry dust, issues with human health and the challenges faced by the elderly and younger generations. Many of the findings will be challenged on a, they said … you said basis, but what is important is that it is recognised that there is human health risk.

Airborne dust enters homes, businesses, it fouls the outside of buildings, motor vehicles and is deposited on residential and lifestyle land, and our food crops this cannot be disputed. Just take a drive down the Main West Coast Road on a Norwest day and it is extremely evident despite best attempts by the quarry industry to supress the issue with water.

What is carried in this dust, how harmful is it? – as a Director of FH are you meeting your governance responsibilities around well-being, health and safety relating to the community. Sure you will have an insurance policy to cover liability, but is it acceptable to even consider such an outcome?

What impact on the flora and fauna? .. what impact on the animals and birds that inhabit this region .. what impact on commercially farmed Free Range chickens … and it goes on...!!!

How will dust generation be mitigated, will it be automated, who sets the boundaries, who monitors and who actually does something about a breach?

The quarry industry has a very average record of performance when we seek to address the many issues raised in this submission; obviously the content could be expanded further however the points raised are real and it is clear the impact of the proposed quarry has far reaching consequences.

I look forward to addressing the hearing in due course.

John Hartnell