

**Before Independent Hearing Commissioners Appointed by  
Canterbury Regional Council and Selwyn District Council**

**In the matter of**                    The Resource Management Act 1991

**And**

**In the matter of**                    Applications by **Fulton Hogan Limited** for  
all resource consents necessary to establish,  
operate, maintain and close an aggregate  
Quarry (**Roydon Quarry**) between Curraghs,  
Dawsons, Maddisons, and Jones Road,  
Templeton

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**EVIDENCE OF SARA HARNETT KIKSTRA  
ON BEHALF OF THE YALDHURST RURAL RESIDENTS ASSOCIATION**

**DATED 10 OCTOBER 2019**

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## Introduction

1. My full name is Sara Jane Harnett Kikstra. I am the Chairperson of the Yaldhurst Rural Residents Association (YRRA). YRRA has submitted on numerous quarry applications and during my tenure as Chairperson I have been involved in the CAPG (Combined Aggregate Producers Group) to excavate below highest recorded groundwater level. I was also involved in the rural chapter of the District Plan and the proposed land swap of the Templeton Golf Course with the Pound Road Quarry.
2. The purpose of this submission is to provide an historical overview of quarry management and practices from a resident's perspective and an overview of the proposed provisions seeking to raise the bar in quarry management practice.
3. Quarries have decimated Yaldhurst. This has been caused by a number of factors. The Christchurch earthquake clearly had an impact on the demand for aggregate in conjunction with a permissive regime in terms of rules. Quarries are not only able to utilize the Quarry Zone but successfully apply for consents outside the Quarry Zone with an activity status of discretionary. The setback distance for a Quarry Zone is between 10 and 20 metres depending on the landscape treatment. Resource consent setbacks can vary but the benchmark are the rules for the Quarry Zone. Compliance is entirely reliant on "self monitoring".

## Dust

4. The effect of this regime is a large increase in quarries particularly extraction only quarries in close proximity to residents. This has created a great deal of anxiety amongst residents relating to the adverse effects particularly dust. Dust not only from a nuisance perspective but also the health effects.  
**"There is uncertainty relating to compliance with the National Environmental Standard for Air Quality for particulate matter smaller than ten microns (PM 10), in particular, Regulation 17(1), which relates to an allowable increase in the level of PM 10 in a polluted airshed. Because it is not clear that this Regulation will be met, the Hearing Panel may need to consider whether off- sets for PM 10 will need to be applied."**<sup>1</sup>

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<sup>1</sup> section 42a report of Deborah Ryan paragraph 3

5. **“ The proposed quarry is immediately adjacent to the boundary of the Christchurch airshed. That airshed is deemed polluted for PM10 under the NESAQ Regulations”<sup>2</sup>  
“Clause 17(1) of the Regulations require that: A consent authority must decline an application for a resource consent (the proposed consent) to discharge PM10 if the discharge to be expressly allowed by the consent would be likely, at any time, to increase the concentration of PM10 (calculated as a 24 – hour mean under Schedule 1) by more than 2.5 micrograms per cubic metre in any part of a polluted airshed other than the site on which the consent would be exercised.”<sup>3</sup>**
6. To that end YRRA would be very supportive of the Pound Road quarry been used as an offset in the Christchurch gazetted airshed.
7. **“I note, however, that Golder identifies in the S92 Response it is anticipated there will be a reduction in activity that would occur at the Fulton Hogan Pound Road processing site if the Royden Quarry is developed. I understand from discussions with a Fulton Hogan representative during my site visit on the 24<sup>th</sup> of June 2019, that Royden Quarry is essentially proposed as a replacement for Pound Road and represents a maintenance of supply rather than an expansion of activity. Given that Pound Road is directly within the Christchurch airshed, I agree that there is a potential for an overall net reduction in PM10 emissions in the airshed itself. This means that the reduction in activity at Pound Road, could be investigated for the purposes of an offset under the NESAQ Regulations if required.”<sup>4</sup>**

### **Pound Road Quarry**

8. Firstly lets look at what a replacement and reduction really means and to do that we need to look at the history of the Pound Road quarry. As noted in this application the Pound Road quarry began life in the 1950's. It has been operating for nearly 70 years. **“Fulton Hogan had been looking at a quarry resource to replace Pound Road quarry which is near the end of it's operational life”<sup>5</sup>**

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<sup>2</sup> section 42a report of Deborah Ryan paragraph 73

<sup>3</sup> section 42a report of Deborah Ryan paragraph 74

<sup>4</sup> section 42a report of Deborah Ryan paragraph 82

<sup>5</sup> Statement of Evidence of Don Chittock National Environment and Sustainability Manager para 11

9. What all this infers is that the Pound Road quarry has been a fully operational quarry, and yet “ **The importation of 95% of raw bulk material from the off site locations by truck and trailer has being ongoing at Pound Road for at least 15 years and will continue for at least the life of Roberts Road.**”<sup>6</sup>
10. In real terms the Pound Road quarry has not been extracting for nearly 20 years and has been kept alive by the importation of aggregate. The truck generation movements for the Royden quarry have been based on an analysis from Pound Road. This demonstrates that all of the adverse effects of a quarry continue indefinitely as long as the processing plant remains. No quarry in the Canterbury area with a processing plant has ever being fully rehabilitated.
11. Fulton Hogan has submitted a Quarry Rehabilitation Plan for Pound Road as part of the District Plan ruling. This includes retaining the processing plant along with 40 hectares. Earlier in the year they applied to increase the truck generation movements from 1,500 to 1,800 (RMA/2018/28). Clearly this is not a quarry being replaced or reducing activity but rather business as usual. As long as the processing plant remains there can be no genuine offset.
12. I also note that in these provisions the amount of active open working area inclusive extraction and rehabilitation area has been reduced from the original 40 hectares to 26 hectares at any one time. However “**The total area of land open to concrete batching, quarrying and associated activities shall not exceed 9.4 hectares at any time, with no more than 5 hectares being used for stockpiles, processing and cement batching. The 9.4 hectares will include the admin hub, the clean fill area, the stockpile areas, unsealed quarry roads, the current excavation area, land that has been stripped in preparation for future excavation and any areas under rehabilitation until such time as it is returned to pasture or crops**”.<sup>7</sup>
13. The proposed provisions are over 16 hectares more than the Burnham Quarry and the open areas increase exposure to dust and reduces visual amenity.

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<sup>6</sup> Statement of Evidence of Peter Savage the Environment and Resource Development manager for Fulton Hogan at the time of the district plan 2015 para 32

<sup>7</sup> extract from the Environment Canterbury Resource Management consent for the Road Metals Quarry in Burnham:

## Quarry Hours

### 14.DISTRICT PLAN

#### 17.6.4.4 Hours of operation — Quarrying activity

The hours of operation for quarrying activity shall be limited to the following:

	Applicable to	Standard
a.	Rural Quarry Zone — Miners Road area	<ul style="list-style-type: none"> <li>i. 0600–1800 Monday to Saturday, except that maintenance of quarry plant may occur at any time; and</li> <li>ii. All other hours Monday to Saturday for the loading and transportation of extracted and/or processed materials only, on no more than six occasions in a calendar year; and</li> <li>iii. 1200–1800 Sundays until 30 April 2018, on no more than six occasions in a calendar year and confined to a two hour period on each occasion.</li> </ul>
b.	Rural Quarry Zone – Pound Road and McLeans Island Road	<ul style="list-style-type: none"> <li>i. 0600–1800 Monday to Saturday and 1800–2200 Monday</li> </ul>

Rural — Stage 2

Independent Hearings Panel  
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Te paepae motuhake o te mahere whakahaou a rohe o Ōtautahi

Schedules to Decision

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	Applicable to	Standard
	areas	<ul style="list-style-type: none"> <li>i. to Saturday until 30 April 2018, except that maintenance of quarry plant may occur at any time; and</li> <li>ii. All other hours Monday to Saturday for the loading and transportation of extracted and/or processed materials only, on no more than six occasions in a calendar year; and</li> <li>iii. 1200–1800 Sundays until 30 April 2018, on no more than six occasions in a calendar year and confined to a two hour period on each occasion.</li> </ul>

As mentioned above the rules for quarries in the Christchurch area are very permissive and yet the proposed hours for the Royden quarry go far beyond those hours. CAPG (Combined Aggregate Producers Group) which Fulton Hogan was a part of, submitted in the district plan asking for similar hours. This was turned down.

15. The two activities that create the most noise are the crusher plant and trucks on the road. While the crusher plant is a reasonable distance from residents, truck and trailer units make the same noise at 3am as they would at 11am. From experience we are woken Monday to Saturday at around 5.30am by a convoy of quarry trucks. The proposed provisions are very exacting, very

precise and I wonder who is keeping a tally. For example, the current provisions for Pound Road and McLeans Island Road allow for 6 occasions in a calendar year Monday to Saturday at any time. Would Environment Canterbury (ECAN) can have a record of what each quarry has done?

## **Truck Generation Movements**

16. It is unclear whether the proposed 1,200 heavy vehicles per day includes night time vehicles. In any event if the Royden quarry application is successful Fulton Hogan will have 3 processing plants all within 3 to 4 kilometres of each other. Interspersed amongst them are extraction only quarries. Both Pound Road and Miners Road have truck generation movements of 1,500. As well as that trucks are travelling from the “extraction only” quarries to the processing plants. An analysis of the overlap with these processing plants and traffic generated from the extraction only quarries is missing.
17. A Code of Conduct is proposed for trucks belonging to other companies to adhere to a certain route. SOL Quarries Ltd (SOL) on Guys Road Yaldhurst has a similar code. Recently there was a deputation to Christchurch City Council from local residents complaining about trucks from SOL using School Road. SOL has no jurisdiction to tell other companies which route to take. Along with management plans they have no legal weight.

## **Rehabilitation**

18. **“Of the fully excavated areas in recently or currently active quarries within the Council’s territorial boundaries, less than 20% has been fully rehabilitated. Apart from the conservation area at Isaacs, and a small block of forestry, completed rehabilitation has consisted of either battering side slopes with no filling or backfilling generally to or near previous land contour, followed by top – soiling and sowing with pasture grasses”.**  
**In his assessment of provisions against standard practice: “The quarrying of materials brought in from other sites is in my opinion not quarrying, it is in essence processing and manufacturing. In my experience with quarry sites elsewhere in New Zealand, there is not usually any need for this activity to be undertaken on quarry sites”.<sup>8</sup>**

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<sup>8</sup> the words of George Cunningham on behalf of Christchurch City Council District Plan

19. Fulton Hogan's extraction only quarry on Barbers Road, original consent 2013 RMA92021283 was for a seven-year term requiring remediation within one year of cessation. In November 2016 Fulton Hogan applied for a 35-year term for backfilling. This was reduced to 10 years by the council.

20. In the Quarry Rehabilitation Plan for Royden Quarry there are two conflicting statements.

- **“the removal of all quarry operating machinery and equipment and buildings at the conclusion of all extraction activities.”**
- **It is possible that the site may be used for ongoing processing of aggregates once the resource on the site is exhausted.”**

Fulton Hogan has four processing plants within the Christchurch boundary, more than any other company. Given all of the above factors it would seem implausible that the first statement would be their option of choice.

## **Summary**

There are aspects of this proposal which are an improvement from the past, such as the landscaping and the proposed gravel shared path.

However, for all the claims of an exemplar quarry it is very much business as usual.

YRRA firstly opposes the quarry but if consent is granted YRRA would like to see:

- a genuine offset under section 17 with the Pound Road Quarry.
- hours of operation which are in line with the standard hours in the Christchurch area.
- a reduction in quarry trucks in the wider area and genuine rehabilitation.