

Before the Independent Hearing Commissioners
at Christchurch

under: the Resource Management Act 1991

in the matter of: Applications by Fulton Hogan Limited to establish a
quarrying operation at Templeton

by: **Brackenridge Services Limited**
Submitter

Statement of evidence of Jane Cartwright

Dated: 14 October 2019

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STATEMENT OF EVIDENCE OF JANE CARTWRIGHT

INTRODUCTION

- 1 My full name is Jane Caroline Cartwright.
- 2 I am the Chair of the Brackenridge Services Limited (*Brackenridge*) Board and have been since 2013.
- 3 I also hold a number of other directorships, trustee and committee member responsibilities including:
 - 3.1 Deputy Chair of Nurse Maude Association Board;
 - 3.2 Member of the Health Practitioners Disciplinary Tribunal;
 - 3.3 Chartered Member of the NZ Institute of Directors;
 - 3.4 Associate Fellow of the NZ Institute of Management; and
 - 3.5 Member of the Ara Institute of Canterbury Council.

SUMMARY

- 4 For over 90 years Templeton has provided a safe community for people with intellectual disabilities and autism to live. Brackenridge supports 130 people in Templeton, many of whom are medically fragile and particularly susceptible to adverse impacts from dust, noise and traffic.
- 5 This evidence is made on behalf of these people, many of whom are unable to speak for themselves. Should the proposed quarry proceed there is the potential for significant adverse harm on people's wellbeing and potentially their lives. The quarry location is too close to where people live and we believe the mitigations proposed are inadequate given the vulnerability of the people we provide services to.
- 6 We strongly recommend the application is declined.

ABOUT BRACKENRIDGE

- 7 For over 90 years Templeton has been a community that supports and cares for people with intellectual disabilities.
- 8 The Templeton Centre opened in 1929 and closed in 1999. In 1974 at its peak, six hundred and fifty four people lived at the Templeton Centre.

- 9 Following the closure of the Templeton Centre, the Brackenridge Estate was established at 150 Maddisons Road in 1999. At the time, 90 people with intellectual disabilities, with high health needs and / or autism were supported to live in 14 residential homes.
- 10 Upon opening, residents and their families were promised "a home for life" by the Government.
- 11 Today Brackenridge supports over 200 hundred people with intellectual disabilities and high health needs and / or autism through community residential, respite and vocational support services.
- 12 Brackenridge supports 130 people in the Templeton community. At Brackenridge Estate, 150 Maddisons Road, 62 people live in 11 homes (leased from Housing NZ) and 8 people live at homes located at Globe Bay Drive and Iraklis Close, Templeton (leased from private landlords). Additionally, 50 people access respite support at three homes at Brackenridge Estate, and 60 people access vocational supports from the support base.
- 13 The remainder of services are provided through 26 homes located across Christchurch and Rolleston.
- 14 The people living at the homes located at Maddisons Road, Iraklis Close and Globe Bay Drive enjoy living in a quiet and peaceful community where the air is clean. This environment meets their specific needs well, particularly those people with autism and / or complex health needs. People with autism have a high predisposition for hyper sensitivity to noise, and those who are also medically fragile are particularly susceptible to the adverse impacts of poor air quality.

CONCERNS WITH FULTON HOGAN'S APPLICATION

- 15 Brackenridge are concerned about the potential for serious harm on the people with intellectual disabilities as a result of the quarry. We believe the proposed site is too close to where these people live.
- 16 The people supported by Brackenridge who live near to the proposed site have intellectual disabilities, autism and other conditions that mean they are more vulnerable than the average population.
- 17 In general people with intellectual disabilities have poorer health than the average population. Poorer general health means they are more predisposed to adverse environmental impacts, and which we associate with quarrying.

- 18 Brackenridge is concerned that the effects of the quarry will result in adverse effects to both the mental and physical health of our clients. We believe the mitigation measures proposed by Fulton Hogan do not adequately reduce the risks for people with intellectual disabilities living in Templeton, given their underlying health statuses. Further, we do not have the adequate funding or ability to relocate Brackenridge's facilities or to carry out mitigation works of our own.
- 19 In particular we are concerned about the negative impacts from noise, traffic and dust, but also their cumulative impact. Whilst the medical literature does not examine the specific impacts of quarrying on people with intellectual disabilities and autism, the literature does describe the increased vulnerability of people to respiratory conditions and sensory reactions to noise and other stimulations.
- 20 With respect to dust, wind direction modelling undertaken by Fulton Hogan suggests the predominant wind direction is from the east. As the homes of the people we support are to the west of the quarry, Fulton Hogan believes there will be little impact.
- 21 This claim therefore assumes that the wind direction only comes from the east, which we know from experience is incorrect. We also experience winds from the south, south west, west, north west and north. This means there will be at times wind that could blow dust in the direction of the homes at Maddisons Road, Globe Bay Drive and Iraklis Close, and expose the people living in these homes to dust which is likely to impact negatively on their health.
- 22 Many of the people we support in Templeton have compromised respiratory functions and are medically fragile. They are particularly susceptible to respiratory illness which can be triggered by exposure to dust. Locating a quarry in close proximity to these people presents a significant risk to their wellbeing.
- 23 The dust and human health assessments undertaken by Fulton Hogan to date have not taken into account these particular susceptibilities. Brackenridge is therefore concerned that there will be potential health risks for its clients associated with the quarry that are not 'acceptable,' particularly given other cumulative effects.
- 24 With respect to noise, many of the people we support in Templeton experience autism spectrum disorder. Noise can have negative sensory impacts on people with autism. Again the close proximity of the proposed quarry is likely to cause noise (from the plant and from traffic) which may also be heightened should the wind be blowing towards the homes of the people we support.

- 25 With respect to traffic, Fulton Hogan's traffic management plans suggest the routing of Fulton Hogan vehicles away from Maddisons Road and efforts to counter the impact for traffic on Jones Road. The plan addresses Fulton Hogan traffic but we remain concerned about the potential for increased traffic intensity resulting from the other traffic associated with the quarry's activities. Heavy truck movements along Kirk and Maddisons Road would have adverse impacts on people with intellectual disabilities from vibration and noise.

CONCLUSION

- 26 Compared to the general population, the 130 people with intellectual disabilities living in Templeton are more susceptible to the adverse health impact risks associated with quarrying activity.
- 27 The proposed site is too close to where these vulnerable people live. Proceeding may significantly compromise the wellbeing and potentially the lives of these people and their families.
- 28 We recommend that the application is declined.

Dated: 14 October 2019

Jane Caroline Cartwright