BEFORE INDEPENDENT HEARING COMMISSIONERS APPOINTED BY CANTERBURY

REGIONAL COUNCIL AND SELWYN DISTRICT COUNCIL

UNDER THE Resource Management Act 1991

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 Roads, Templeton

Carole Greenfield
2/341 Newtons Road
Weedons

9\(^{th}\) December 2019

Introduction

My full name is Carole Greenfield, and I have enjoyed living at my current address for almost 20 years. We were fortunate to be able to buy our property 20 years ago in order to satisfy our desire to live in a rural environment, and contribute to the local community. Our small lifestyle block is situated 1.8 km to the northwest as the crow flies, from Curraghs Road boundary of the proposed quarry.

We do experience dust and smell from the Miners Road complex, as we are directly downwind on the prevailing north-easterly. I normally concentrate on productive tasks such as encouraging the growth of the three species of nut trees in our established orchard. But that activity has been considerably reduced for the past year, as a result of dealing with the flood of documentation resulting from the Roydon Quarry application.

In earlier years I had been involved with residents' associations and been involved with some substantial consultations such as the Community Charter which fed into the development of the Greater Christchurch Urban Development Strategy in 2007. But I underestimated the volumes of reports generated by the Roydon Quarry application.

Consequently I have endeavoured to keep abreast of all the recent documents, particularly condition changes, and apologise in the event of any of my points of concern having been addressed in any conditions updates.
I am not an expert in any of the reporting areas, but I am sufficiently educated to be able to read and analyse vast amounts of documentation, and criticise confidently. Perhaps it is a result of my lack of familiarity with RMA application documents in general, but an initial and continuing concern is that so much of the content of the applicants documents is what I would describe as “science-lite”. This application involves many serious and fundamental environmental and social concerns, which I do not consider to have not been addressed with any scientific rigour, leaving doubt and unease with regard to the outcomes. The majority of the applicant’s “expert” reports appear to be based on assumptions, opinions, possible outcomes, modelling and current economic and management mantras. Like other submitters I would appreciate an explanation of what is meant by “less than minor” and how it is measured.

Having read both applicant’s and submitters’ evidence documents, I continue to oppose the proposed development of an aggregate quarry on this site for all the reasons stated on page 3 in my original submission.

An additional reason is the lack of direct consultation by the applicant with local residents in both Templeton and Weedons. I cannot support the suggestion that a Community Liaison group is created. There has not been any consultation with any of us. And I contend that it is not the place of local residents to police industrial operations. That is the function of the relevant local authorities, to monitor and enforce compliance when necessary.

I understand Fulton Hogan’s cold economic logic in choosing this site for a quarry, but the application has to be considered for its impact on the surrounding area, both immediately and for 50 years into the future. I refer to Amy Adams clear explanations to the panel, on 22nd November

Other submitters are addressing and covering all the areas of concern with great detail and dedication, so today I would like to concentrate on my concerns in these particular areas:

- SDC District Plan
- Environment and Landscape
- Water
- Traffic

But in an initial overview I would like to briefly comment on the following points:-

**Economic Benefits**

These have been overstated, as explained by Mr Martin Flanagan in his submission and evidence. The projection of $0.7m resulting from employment is a relatively small drop in the bustling local economy, and I note that Mr Copeland has agreed with this point

The most obvious economic benefit is to Fulton Hogan’s bottom line. There does not appear to be an immediate and urgent need for more aggregate, and we observe that Fulton Hogan’s already consented land along State Highway 73 is yet to be exploited. There are sufficient reserves of aggregate in existing quarries to allow time for a little more future planning for a truly exemplar quarry
Housing and infrastructure projects are very steady at the present time, and aggregate supplies are good.

Revisiting the Readymix Concrete delivered chart, the local requirements continue to be stagnant.

And the latest ANZ truckometer shows a very slight upturn in growth, based on the narrow parameters of GDP measurements.

**Noise and Vibration**

The expert reports appear to be cajoling us with the information that there will only be a slight increase in noise levels resulting from the quarry operation, and that these will be less than minor, in an environment which is already being subjected to increasing noise levels.

But I understand that the decibel scale is logarithmic, and I found this explanation helpful:

A 70-dB dishwasher will sound about four times as loud as a 50-dB refrigerator, but in terms of acoustic intensity, the sound it makes is 100 times as powerful.
So an increase of 4-5dB resulting from truck movements at night on Dawsons Road will in fact be noticeable, and this consistent increase in noise levels cannot be considered as less than minor. (A 3 dB change yields a 100% increase in sound energy and just over a 23% increase in loudness.)

Analysing all the additional sounds individually is misleading, and the cumulative effects of all the machines and vehicles working for at least 12 hours per day cannot be downplayed. And noise and vibration does travel. We can be aware of trains sitting on the line for a few minutes, especially on a clear night, and on occasion we can hear and feel the very large Antarctic and NASA planes taking off at night. And we well aware that there are large truck and trailer units frequently travelling along Curraghs Rd, which is approx 300m from our eastern boundary.

I appreciate Commissioner McGarry’s suggestion that the quarry would be better not be working on public holidays, to allow the local residents (and the staff) some respite. We noticed that it was most delightfully peaceful in our area on Show Day.

And I note the concerns about any increases in sudden and loud noises raised by the staff and families on behalf of the residents of Brockenridge.

In the noise management plan ref : (revised) para 44: of the latest update for the Officer Set of Conditions – Land Use Consent – SDC (page 11), I noticed the following exemption

**Noise**

36(43) All activities on the site (other than construction), measured in accordance with the provisions of NZS 6801:2008 “Acoustics — Measurement of environmental sound”, and assessed in accordance with NZS 6802:2008 “Acoustics — Environmental Noise”, shall not exceed the following noise limits at any point within any other site, during the following times:

a. **Daytime 0700 to 1800 hrs 55 dB L_{eq}**

b. **Evening 1800 to 2000 hrs 50 dB L_{eq}**

c. **Night 2000 to 0700 hrs 45 dB L_{eq} and 70 dB L_{Amax}**

37(44) In order to permit vehicle access onto the site, the noise limits above shall not apply to vehicle movements when measured within 250 m of the site’s heavy vehicle entrance.

This appears to be a let out clause for trucks entering and exiting the quarry, and appears to negate many of the other proposed noise mitigation measures.

**SDC Plan**

Under the existing Selwyn District Plan, the site is zoned Inner Plains. The existing version of the plan with reference to The Inner Plains rural zone recognises the rural land extending from West Melton through to Tai Tapu is identified in the RPS as providing an important contrast to the ‘urban’ landscape of the city.

The definition of “rural activity” in the current Plan does not include quarrying. Rural based industrial activities are listed as permitted providing that maximum building coverage does not exceed 100m² and no more than 2 FTE staff is employed.
So under the current version of the District Plan quarrying is a non-complying activity within the Inner Plains Zone.

Other conflicts with the current legislation include:

Policy B 1.1.7 - which seeks to protect and maintain the life supporting capacity of soils and avoid activities which have the potential to result in contamination of the soil resource.

Objective B2.1.1 - seeks that new land uses do not compromise the safe and efficient operation of roads

Policy 1.3.4-specifically seeks to manage activities which may result in the surface runoff of contaminants or leaching of contaminants into groundwater.

The current plan recognises that that the rural area has a character that is distinct from the townships and that people value the rural outlook.

And it is recognised that the Selwyn District Plan is under review, including an acknowledgment that the activity of quarrying needs to be managed and rules put in place.

This particular part of the Inner Plains Zone is under great pressure from potential development. And the current protection under the Noise Contours Rules is not a given. The equivalent legislation in North Canterbury was very quickly removed, when it was necessary to allow urgent housing developments after the earthquakes. We need to continue to cherish and encourage the retention of this clearly defined urban/rural edge to Christchurch. The rural activities carried out here are helping to feed and clothe the people of the city, and to entertain them at Addington Track. And it provides a readily accessible drive into the country to allow city dwellers to connect with the rural environment and make purchases from the roadside produce stalls.

The Weedons area has been an area subject to quite stringent regulations from Selwyn District Council regarding appropriate use of the land. We had to demonstrate that our land was being used productively. The placement of a huge, 50 year quarry so close to the edge of the existing town of Templeton and so close to so many lifestyle blocks all purchased in good faith, for the degree of country living and quiet enjoyment provided, is in breach of any concept of appropriate use. The whole local rural amenity will be compromised and lost forever if the proposed quarry is approved.

It is most important that the Inner Plains Zoning is retained, and it is equally important that local authorities identify suitable areas for quarry development in the future, with clearly defined expectations of management plans. This future planning may relieve the need for costly and time-consuming hearings such as this one.

Environment and Landscape

We all value the Roydon site as it is, and historically this was a highly productive arable farm producing cereal crops and animal fodder crops. The underlying soil is Templeton sandy silt loam, which is considered highly fertile. Much of this good soil has already been lost to development, and it would be regrettable to see the soil at Roydon go the same way. The arable farming eco system will be well established now, with many species of microbes, invertebrates and plants contributing to the balance and health of the soil. But in the application documents the site is consistently described as being of little ecological or agricultural value.

I am dismayed by the apparent lack of respect shown to this land and the existing living systems, displayed by the applicant, and that it does have aesthetic value and significant character for the local residents. It is indeed an example of an average open Canterbury Plains landscape, but is held dear by the local Weedons and Templeton residents.
Should the quarry go ahead then this view across the green paddocks to the Southern Alps will be lost forever. And 170 hectares of good productive land will also be lost forever.

I do not agree that the formation of bunds 3 metres high enclosing the site on all sides can be described as less than minor. And I do not agree with the suggestion made at the hearing that bunds have become a normal and accepted feature of the local landscape. Some plantings do alleviate the ugliness and unnaturalness of the bund structures, but it is important to choose the species with care, and continue to tend them for the life of the quarry. The perimeter plantings will be subjected to large amounts of dust from both the quarry workings and the passing trucks and this will create problems for their physiological activities. So dust mitigation for the trees may be necessary. It is important that all the trees and shelter belts are tended and maintained, in order to avoid the same outcome as the sad shelter belt on the Hasketts Rd boundary of Pound Road quarry.

I agree with Abigail Smith’s recommendation that the staging of the proposed extraction is modified to start in a location which is already surrounded by established shelter belts. The current proposed Stage 1 starts on the eastern boundary which does not have an existing shelter belt. If the CCC proposals to develop a cemetery and a sports complex on the eastern side of Dawsons Rd are implemented, then it is very important for a fast growing shelter belt to be planted across the road.

The suggested walkway around the perimeter does not appear to be a good idea. Unfortunately the site will be noisy and likely dusty during the hours most people are out exercising, and the significant increase in heavy vehicle movements will certainly make Jones Road a “no go” area for walkers and cyclists. Perhaps the walkway money can go into a trust for future community use.

Should the application be approved, then the topsoil will be stripped back and the area will be then be systematically and permanently degraded in order to create the quarry. Even with the best of intentions, the Roydon site will be environmentally damaged for several generations, and rehabilitation will merely be another grass covered hole in the ground.

There is a lack of clarity regarding the intentions regarding rehabilitation of the site. Surely the application cannot be allowed to go ahead without a full and proper rehabilitation plan in place.

The applicant is requesting an open ended period of consent, and I understood from a meeting with the applicant that the intention is keep the site open for alternative business activities after all extraction has been completed.

The applicant’s various suggestions for post quarry activities I consider to be fanciful and largely impractical. The site could not be used for lifestyle blocks as it will not be possible to install conventional septic tanks and
domestic water supplies in the 300mm soil over a metre of cleanfill or subsoil. And housing, stock and farming activities all present potential danger to contamination of the underlying aquifer. And it was stated at the hearing that some trees can manage to put down roots through cleanfill. But the roots will be busily growing down to the water table, and their root exudates will seep into the aquifer.

So I do not agree with the applicant’s statement that “the only noticeable change to rural character will be the changes to the topographical elements. Post rehabilitation there will be no adverse change to rural amenity”.

I find it extremely difficult to countenance the fact that the future community will be left with a large hole in the ground. And this will be in addition to a significant number of other large holes in the ground in the local area. Several other local quarries are coming up to the end of their extractive lives, and it is acknowledged that suitable cleanfill is a scarce commodity.

Problems relating to cleanfill supply and management have been addressed and clearly explained by Dr Lisa Scott and Richard English. (Groundwater quality investigation at Miners Rd quarries, Yaldhurst Christchurch Report R19/05 Jan 2019: Quarry Rehabilitation’ - Background report for Christchurch City Council – Twelfth Knight Consulting, July, 2014 - Report No: CCC020714 (Issues with respect to quarry rehabilitation are discussed in depth in this report.) and reading through the proceedings in recent Environment Court hearings (Harewood Gravels appeal, Nov 2018, and Selwyn Quarries appeal, Sept 2019) have been most instructive and enlightening about the management of cleanfill content and its potential to contaminate the underlying aquifers.

A clear “Chain of Custody” system over fill material should be a mandatory inclusion in the rehabilitation plan.

Water

As co-holder of irrigation consent to draw water for the irrigation of up to 1.8 hectares, I have been following the arguments re water use with interest and concern. Our well is in the same band as the existing Roydon bore, and some 70 other consent holders The Trigger Well is M36/0217 @ JONES ROAD for this group of consent holders, and it is a condition of our consents that we all have to regularly check the CRC Irrigation Restrictions website for relevant information, and CRC states “It is your responsibility to understand the minimum flow conditions imposed under your consent “ the regulations are that water take has to be reduced when the trigger well levels fall, or totally cease if it falls below a certain level.

There remains discomfort and insecurity amongst local residents regarding the water quantities to be taken under the existing conditions for CRC 182422, and from the water races. The local groundwater is currently over allocation, at 132%. I note that there still appears to be some level of disagreement in the most recent Joint Witness Statement on Water Quantity.

The memorandum from Wynn Williams (14 August 2019)is of the legal opinion that it should be treated as a new application (under section 104 of the RMA) And that in CRC’s s42a report it is recommended that the application be declined for Section 104 and several other sections of the RMA.

The applicant currently appears to be performing backflips in order to demonstrate that the water usage on the Roydon site will be constrained to an agreed annual maximum volume of 119,920 cu.m. to be taken from the existing well. I presume that this volume will need to be modified accordingly if it is a very dry season and the Irrigation Restrictions kick in. The applicant might do well to reverse their recent decision regarding the need to collect and store rainwater, with such a tight water budget.
A number of comparisons with the Pound Road operation have been made during the hearings. I have been studying and comparing the water consents for both operations. The permitted maximum water take at Pound Road quarry is currently 507,296 m³ p.a., as shown on CRC146631. The previous allowable maximum take at Pound Rd was 993,728 m³ p.a., prior to the transfer of 432,432 m³ p.a. to the permit for the McCleans Island site in 2014.

As shown in this table, the other local quarries all have considerably higher consented allowances, and while the actual annual consumption figures are not available, these figures imply that quarrying requires a great deal of water. Roydon will indeed become an exemplar model if it is able to work within its predicted water budget.

<table>
<thead>
<tr>
<th>Quarry</th>
<th>Current consented maximum take</th>
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</thead>
<tbody>
<tr>
<td>Fulton Hogan Pound Road</td>
<td>507,296 m³ p.a.</td>
</tr>
<tr>
<td>Fulton Hogan Miners Road</td>
<td>674,284 m³ p.a.</td>
</tr>
<tr>
<td>Fulton Hogan Mcleans Island Road</td>
<td>432,432 m³ p.a.</td>
</tr>
<tr>
<td>Winstone Miners Road</td>
<td>14,999 m³ in any period of 5.5 days</td>
</tr>
<tr>
<td>Road Metals – Yaldhurst</td>
<td>594,000 m³ p.a.</td>
</tr>
<tr>
<td>Road Metals – Wards road</td>
<td>353,620 m³ p.a.</td>
</tr>
</tbody>
</table>

A great deal of modelling has been carried out to justify the proposed water take, and there appear to be inconsistencies in the figures and calculations used in the original Golders document.

It is stated in the Golders modelling that the dust suppression water demand is the greatest water demand, followed by processing plant, truck wash, and irrigation.

The modelling employed for the factoring in of the rainfall calculations is a simple "bathtub" model in which soil water in some layer of soil at the surface is known on one day, then rain is added, and evaporation and deep drainage (infiltration to deep soil water and groundwater) is subtracted, to calculate the soil wetness on the next day. There are two key sensitivities to the modelling of the water demand:

1. the maximum infiltration rate, especially when soil is dry during the summer (since infiltration rates depend on soil moisture content - faster in dry soil, slower in wet soil - which the model chooses to ignore)
2. the area that needs to be watered to keep dust down when the surface soil wetness is below critical as per the bathtub calculation. Only part of the total area of the quarry is considered in need of watering and adding just 1 or 2 ha more for dust management will increase the demand for water by 20-35%

A further concern is that windspeed has not been properly taken into account when considering the evapotranspiration rates.

The key climatic parameters at selected locations in Canterbury, including wind, evaporation and estimated (Penman) potential evapotranspiration, are readily available in the recent NIWA publication "The Climate and Weather of Canterbury".

With reference to water needed for irrigation, I have carried out a "citizens" calculation to look at the total surface area of the bunding which will require irrigation. Using Google Maps I measured the site perimeter to be a total of 5.63km. and using the bund dimensions from the Landscape Management Plan I calculated that the total surface area of the bunds to be 8.9 hectares.
I used the supplied figure of 6050 cu.m. water required to irrigate 1 hectare of grassed area p.a. (Ref: Beac AEE for site to site water permit transfer for McLeans Island 2014). The figure reached to irrigate all of the grassed areas of the bunds continually for a year is 55,685 cu.m. of water. It would be helpful if Mr van Nieuwkerk had more clearly demonstrated his calculation method to reach his annual demand quantity of 6997 cu.m.p.a for irrigation, on page 11 of his Evidence Document, dated 23rd Sept. Establishing the grass on the bunds, and the trees in the shelter belts will consume a significant quantity of water.

And my concerns in my original submission regarding the take from the water races have not been addressed. There does not appear to be any acknowledgment that the Paparua water races are a shared local amenity, and that any excessive take from the race at Roydon site could impact on the surrounding land owners. All my neighbours have stock which depends on drinking water from the same race.

The final paragraph of the JWS on groundwater take states that “all experts agree that there is a degree of uncertainty in the assumptions on which the water requirements estimation is based.”

I add following points to add to that degree of uncertainty:

- The science for the proposed water take is not proven satisfactorily
- It is noted that there appears to be perpetual restriction on take for the forty six consent holders on the Pound Road Trigger Well Band (M35/1110 @ POUND RD CH CHR 6). And there are quite frequent restrictions on the nearby Chattertons Road and Weedons Ross Rd trigger well groups.
- The existing consent expires in 2032. Is it assumed that it will be rolled over to allow extraction to continue for 40-50 years?
- The applicants have now removed the washing of aggregate from the proposed activities at the Roydon site. Can it be clarified if this will be replaced by the need to truck dusty aggregate in dusty trucks to other quarry sites where it can be washed?
- There is no clarity regarding which trucks will be washed. Will all trucks visiting the site be directed through the truck wash, or will this only apply to company trucks at the end of each day?
- There is insufficient reassurance that the groundwater will not be contaminated or fully tested.
- I am surprised that nitrate-nitrogen has been removed from the list of tested contaminants. There will be nitrates entering the site in the stock race water to be used for irrigation, and in ammonium, the predominant ion in rainwater will become converted to nitrate in these near neutral soils,
- Dissolved oxygen and dissolved organic carbon are also excluded from the contaminants and trigger concentration table. It is important to test for these chemicals due to the potential for adverse effects on groundwater biota. A recent report “Groundwater ecosystems: Functions, values, impacts and management. Prepared for Horizons Regional Council. NIWA June 2018” explains what is occurring in our aquifers in detail.
- We are not informed of the chemical composition of any proposed dust suppressants. Presumably CRC will need this information in order to approve their use. The potential for chemicals leaching into the aquifer has to be acknowledged.
- There has been much discussion during the hearings of the lack of knowledge about the location of all neighbouring wells and the potential for contamination problems for neighbouring wells, resulting in considerable updates to the Officer Set of Conditions for CRC.
The quarry floor will be only 1 metre above the underlying aquifer. Any liquid spills will likely move through that metre with great speed into the unconfined aquifer, due to the porosity of the local subsoil.

Traffic

Templeton and Weedons areas are hemmed in by quarries. It is now almost impossible to travel in the area without encountering quarry related HGVs, on all classes of roads. Weedons residents are concerned about the increase in numbers of truck and trailer units already experienced on the narrow local roads currently designed as secondary collector roads.

As with most of the other contentious areas of concern, evidence about quarry traffic has been presented with no real reference to what is already happening on the local roading network. Since making my original submission a new transport operation has been set up on State Highway 73 opposite the existing Yaldhurst quarries complex. This is a big operation with a large number of logging truck and trailer units going into the local mix. I-zone to the west, the airport campus to the north, and Waterloo Business Park to the east are all expanding very rapidly and adding more HGVs onto the local roads.

NZTA predicted that the traffic volumes through Templeton and Hornby should reduce significantly when the new motorway is completed. I contend that this reduction is now unlikely to occur as a result of the continuing traffic increase described above, plus the continuing new subdivisions at Rolleston and West Melton. Just Fulton Hogan traffic alone should substitute for the projected reduction of truck numbers.

Consent application has been modified to 1200 heavy vehicles per day, and this is still described as less than minor, and unlikely to be noticed by local residents.

Even after amendment there is an implication of vehicle numbers and associated noise which is daunting. An additional 600 truck and trailer units travelling through our local area both day and night is very significant, and is the equivalent of an additional 7,200 passenger cars on the road. I sincerely hope that the proposed night time controls of vehicles on the local secondary collector roads can be enforced.

The proposed Code of Conduct for drivers is a nice to have, but it may be difficult to operate, as it cannot be legally enforced for other drivers.

We are still not informed of the precise location of the quarry entrance on Jones Road. This is important in light of the safety problems relating to HGVs pulling into and out of the quarry. Jones Road is narrow, busy and its traffic is fast moving. Trucks may well be pulling out of the quarry to turn right onto Jones Road in order to access the motorway and points south at the Weedons Ross Road intersection. When new roads are opened and existing roads are improved, a new subset of problems are quickly created by the increased volumes moving in. It is unlikely that Jones Rd traffic will reduce in the future, as it is popular with commuters accessing the improved Pound Rd in order to travel to the airport and other northwest points.

I understand from the most recent version of the Queue Management Plan that it has been requested that the final version of the Jones Road/ Dawsons Road roundabout design is delayed until close to the opening of the quarry, and after the new roundabout on the Main South Road has become operational. Can such an important item be excluded from the forthcoming decision?

It is disappointing though that NZTA and KiwiRail will be invited to a collaborative workshop at this stage; there is no mention of an invite to local residents or businesses to participate. This intersection redesign has
been referred to by many submitters. The local travellers on Jones Rd are most concerned about the dangers arising from the proposed 3 arm version. Not going out to public consultation is another example of the dismissive behaviour shown by the applicant.

The latest update for the Officer Set of Conditions – Land Use Consent – SDC includes this table of amended hours of operation (page 5):

**Operational**

**General**

1. The hours of operation are 7.00 am to 8.00 pm, Monday to Saturday. Outside of these hours restricted processing operations and load out of trucks may occur as detailed in Table 1 below.

<table>
<thead>
<tr>
<th>Time</th>
<th>Duration</th>
<th>Range of activities</th>
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</thead>
<tbody>
<tr>
<td>6.00 am to 7.00 am</td>
<td>Monday to Saturday</td>
<td>Load out of trucks, truck movements, site pre-start up including operational warm up of conveyors and machinery, Clean fill deposition.</td>
</tr>
<tr>
<td>7.00 am to 6.00 pm</td>
<td>Monday to Saturday</td>
<td>Full range of quarry activities.</td>
</tr>
<tr>
<td>6.00 pm to 8.00 pm</td>
<td>Monday to Saturday on 150 days per annum</td>
<td>Full range of quarry activities except mobile plant processing and working of clean fill, with the exception of processing using mobile plant and backfilling.</td>
</tr>
<tr>
<td>8.00 pm to 6.00 am</td>
<td>Monday to Saturday on 160 up to 60 nights per annum</td>
<td>Load out of trucks and truck movements, and ancillary activities such as operation of weighbridge and site offices and clean fill deposition.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Time</th>
<th>Duration</th>
<th>Range of activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sunday and public holidays</td>
<td>For up to 15 days per year</td>
<td>Load out of trucks and truck movements – load out of aggregate and clean fill deposition.</td>
</tr>
</tbody>
</table>

At all times, dust suppression, operation of weighbridge office activities, site security and light maintenance as required.

NB: 'Clean fill deposition' above, means the unloading of clean fill at the site, but not the working of clean fill.

If such potentially anti social operating hours are essential to the economic viability of a new quarry, then relocation to a suitably remote site seems logical, where noise and traffic will not impact on a large established community.

Finally I would like to note that there is a volume of local and national legislation under review, which is potentially relevant to this application:

- A Comprehensive Review of the RMA
- Draft National Policy Statement for Freshwater Management
- Proposed National Environmental Standards for Freshwater
- National Policy Statement for Highly Productive Land
- Selwyn District Plan Review

It may be to Fulton Hogan's benefit to get this particular application through before any new relevant legislation is passed.

There has not been any true community consultation, but there has been plenty of expert conferencing from which the submitters have all been excluded!
Mitigation proposals appear to be generalised and based on consultant templates.

The proposed quarry would have a profound effect on the local community, and the local environment. The application has caused anxiety about the impacts on residents' wellbeing, and the long term degradation of the locality.

The major beneficiary of the quarry will be Fulton Hogan, and it is not reasonable to expect the immediate community to live in such changed circumstances, for the supposed benefit of the wider city. There are other less intrusive sites where a new aggregate quarry can be established. And this can be the exemplar quarry to set the new guidelines for the rest of New Zealand.

Both SDC and CRC have recommended that the application be refused for profound reasons, in their s42a reports and I request that the commissioners uphold their recommendations.

Thank you for the opportunity to present this evidence.

Carole Greenfield