

FORM520: SUBMISSION ON RESOURCE CONSENT APPLICATIONS

SECTION 96 RESOURCE MANAGEMENT ACT (RMA) 1991

TO: Consents Hearings
Environment Canterbury
PO Box 345
Christchurch 8140

Ph: (03) 353 9007 Fax: (03) 365 3194

OR: Email: hearings@ecan.govt.nz

OR: submit by completing an on-line form at:
<https://www.ecan.govt.nz/do-it-online/resource-consents/notifications-and-submissions/notified-consents/>.

SUBMISSIONS CLOSE: 5.00pm FRIDAY 27 NOVEMBER 2020

A. PERSON/GROUP/ORGANISATION MAKING SUBMISSION

Full name of submitter:

Mandy + Steve Benyon

Postal address for
Service:

Postcode:

Contact Phone:

Private:

Work:

Cell:

Email Address:

Contact Person:

Mandy

Information about this resource consent process, including any details relating to a hearing will be sent via email

☐: - Please tick this box if you do not wish to receive communications via email.

Name of applicant:

TAGGART EARTHMOVING LIMITED

Site Address:

RANGIORA RACECOURSE, 309 WEST BELT, RANGIORA

1. Applications to: Canterbury Regional Council

☒ CRC204106 – land use to excavate

☒ CRC204107 discharge contaminants to air

☒ CRC204143 - discharge contaminants to land

☒ CRC211629 – water permit

☐ I/We support the above application

☒ ~~I~~ We oppose the above application

☐ I/We are neutral to the application(neither support or oppose)

2. Applications to: Waimakariri District Council

☒ RC205104 – land use to establish, maintain and operate an aggregate quarry

☐ I/We support the above application

☒ ~~I~~ We oppose the above application

☐ I/We are neutral to the application(neither support or oppose)

3. The specific parts of the application that my/our submission relates to are: *(detail the specific activities or effects)*

See Attached Pages

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

See Attached Pages

5. I/we wish the consent authority to make the following decision: *(give details, including the general nature of any conditions sought.)*

See Attached Pages

6. ☐ 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 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 Councils.)

7. ☐ I/we **am/are** 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.

8. I/we **request**, pursuant to section 100A of the Resource Management Act 1991, that you delegate your functions, powers and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority. ☐ Yes ☐ No

Signature

22-11-2020

Date

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.*
4. *If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in Part 11A of the Resource Management Act 1991.*
5. *If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.*
6. *Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):*
 - a. *it is frivolous or vexatious;*
 - b. *it discloses no reasonable or relevant case;*
 - c. *it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;*
 - d. *it contains offensive language;*
 - e. *it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.*

Submissions Letter

- Oppose all of the application
- We seek that the application be declined

Introduction

Mandy & Steve Benyon, Two of our boundaries,
border the Rangiora Race course. We have lived here and raised our two daughters since 2005.

Steve - Storeman and Mandy - Registered Surgical Nurse (shift worker)

We are concerned about the physical effects of the proposed quarry, such as noise, dust, traffic, water and the social consequences for us and our neighbours in the area, including our mental and physical health and our social wellbeing.

Together these effects constitute a significant negative social effect on amenity values and the landscape, not only for us but the wider Rangiora community.

No amount of screening or landscaping or other such mitigation measures are going to remove the reality and effects of quarrying activity in this area.

DUST

Dust is a strong concern, dust on the road, and dust entering houses, resulting in negative ambience, additional cleaning and health worries. We will not be able to have our windows open on hot days if dust is coming from the proposed quarry, and our outdoor activities and gardening will be reduced due to dust. Our vegetable garden produce will be affected by dust. As well as the concerns for our outside washing line, if dust is a continuous irritant.

Concern for potential health problems from dust – asthma, bronchial and sinus conditions. (Have the effects of dust on any pets or even horses been considered?)

Dust will arise from multiple sources, including quarry activity, heavy machinery, improperly vegetated bunds, vehicle movements, who will monitor the trucks going in and out of the site, to ensure they have covers in place, in and around the quarry and on access roads.

It is known that quarries create significantly more dust than other rural activities, also quarries do not shut down in high winds.

It has been noted historically on other neighbouring sites to quarries, that dust contaminants can carry seeding plant material for some distance and will have a negative effect on our pastures for our livestock.

Will air quality monitoring be undertaken by an independent organisation or will the requirement of an automated water sprinkler system be considered adequate control of this; we consider regular daily monitoring be put in place to ensure good air quality is maintained at all times.

Dust has the potential to adversely affect pilot visibility, the proposed quarry will be in the Rangiora air fields flight path.

We are concerned about what procedures will be put in place and maintained for after hours, weekends or night time if dust is occurring due to high winds.

It is noted in the proposal that when the irrigation dust suppressant is unavailable that a backup of water cart is proposed. This is a highly unsatisfactory mitigation measure, that must be replaced by an installed onsite automated irrigation dust suppression system before the operation commences.

We have recommended conditions to mitigate the adverse effects of this proposal in regard to dust and dust suppression and these are attached at the end of this submission.

NOISE

Noise generated from the site, operational noise, equipment, vehicle movement noise will be heard all around and the cumulative effects of this would be detrimental to us and the neighbourhood amenity.

Noise from trucks is also a concern, what will be the impact of frequent heavy truck movements in the area? Vibrations associated with heavy truck movements can be stressful and have an impact on resident's mental health.

Being a shift worker, I have to sleep at times during the day, the increase of truck movement noise on our boundary, will have an effect on my ability to sleep and thus a roll-on effect with my nursing practice and the welfare of the patients in my care.

We have recommended conditions to mitigate the adverse effects of this proposal in regard to noise suppression and these are attached at the end of this submission.

INCREASED TRAFFIC

Increased truck movements will cause considerable disruption to River Road and the flow of vehicles on and off this road and other roads/streets adjoining. The increased truck movements could decrease the quality of the road surfaces and cause edge break.

Gravel falling from quarry trucks could cause damage to our cars; shattered windscreens and or stone chips to the paint work of our cars.

The Waimak Council has promoted this area of the Ashley River as recreational, encouraging families to come to this area and enjoy the outdoor experience.

River Road is a collector road and is the access point to many of these recreational areas and activities for families, walking, dog walking, running, biking, horse riding and swimming, increased traffic with heavy trucks will make this area unsafe.

We have recommended conditions to mitigate the adverse effects of this proposal in regard to increased heavy traffic and they are attached at the end of this submission.

WATER

We are worried about the effects of quarry activities in regard to ground water and contamination of this water.

We also have concerns re the supply of water for the quarry activities as the racecourse has a limited supply. Is there sufficient water to counteract the effects of the dust? Will the amount of water on site be sufficient for the use of dust suppressant, on all areas of the proposed quarry and vehicles? What will be the back-up plan if this water source fails?

AMENITY

The ambience of this area has an important social effect that is highly likely to be lost with the running of a quarry. The rural outlook, the feeling of tranquillity that we currently have and enjoy, will be lost. The impact on the rural character we enjoy and on landscape values will be significant and irreversible.

LANDSCAPE

The proposed bunds, while used for noise mitigation, will add hundreds of metres of visible grassed embankment, reducing the openness of the landscape, reducing the sense of rural outlook and spaciousness that is valued by us and our neighbours.

Quarrying and associated activities, such as stockpiling of material, outdoor storage and machinery have the potential to detract from the town boundary landscape and in particular, the visual amenities of adjoining properties. Quarrying is recognised as a rural productive activity and should only be allowed in areas of more open landscapes not on town boundaries close to residential housing.

LAND VALUE

We worry about the issues of decreased capital as a result of decreased land values in an area with a quarry as a neighbour. We purchased in this area for the quiet and tranquil lifestyle that is on the edge the township of Rangiora.

CONTAMINATION

We notice that the proposal is silent on existing contamination investigations. On searching the Listed Land Use Register (LLUR) it is noted that the site has been flagged for previous horticulture use and as such is identified as a Hail Site.

A Limited soil investigation INV 255090 Dated 27 January 2020 was undertaken by PDP to confirm whether any imported material was used to form the Racetrack.

The report refers to racetrack of which there are 3, however 11 samples were collected between 0.05 and 0.15m depth of which only five were analysed for heavy metals with a conclusion of at or below background concentrations, however only the track was investigated not the proposed quarry site and it would appear that the testing is incomplete and the whole site should be investigated further to establish whether some remediation needs to take place before any scrapping of the soil.

GENERAL CONDITIONS SOUGHT

Regular daily monitoring be put in place to ensure good air quality is maintained at all times.

After hours dust control should be managed with a number of permanent sprinklers being set up, which are activated remotely if necessary and will come on at any after hours time, when wind is predicted to be high enough to cause dust impacts.

In the case of a breach in dust monitoring, beyond Taggarts control, we propose conditions that any property boundary within a 500 m setback from the quarry have a HRV system installed and maintained at the applicants' expense.

To ensure that the effects of any noise are mitigated we propose a condition that any residences boundary within 500m of the quarry site be fitted with triple glazing to ensure the quiet ambience that exists at the moment.

Cones Road (Strategic Road) and River Road (Collector Road) will need to be upgraded to carry the extra heavy traffic movements caused by the quarry activities. The footpath along River Road will need to be upgraded to ensure safety for all users and any ongoing maintenance as required at the applicant's expense.

Any damage to cars e.g. Shattered windscreens, stone chips to paint work etc. All repair costs incurred for this damage must be met by Taggarts.

Conclusion

It is unclear if any other alternative sites, with regards to suitability have been considered for this project and if any follow up took place.

Why we understand and except that quarries are best located in rural locations we believe there must be a limit to the localised effects of extensive quarrying and numbers of operators so close to residential zones and amenities. The Resource Management Act must take into account all the existing and cumulative effects before granting any further expansion or extension of quarrying activities in the Rangiora community.

The Waimak council state on their website, they are committed to working alongside the community to see positive outcomes in the life and development of the district. They have promoted residential housing, Pre-school facilities, Age Care Complexes, a church, shops and Food services in this area, a quarry has no fit place in a community that caters for all of the above.

We consider the effect of the proposed quarry going ahead would have considerable effect on us and our property, when described in isolation, but considered in combination, an even greater effect which is not acceptable. This proposal would have a detrimental effect on the amenity of our home, health and surrounding properties

Due to all the effects stated above, we wish this consent to be declined.