

**From:**  
**To:** [Hearings](#)  
**Cc:**  
**Subject:** CM: Notifications Consent Submission: Group 592  
**Date:** Thursday, 12 November 2020 11:57:30 AM  
**Attachments:** [Quarry-Submission.pdf](#)

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**Group ID: 592**

**Consent name:** Taggart Earthmoving Limited

**Consent number:** CRC204106, CRC204107, CRC204143, CRC211629, RC205104

**Name:** Ian Bywater B.Sc. (Eng), F Eng NZ

**Care of:**

**Mailing address 1:**

**Mailing address 2:**

**Suburb:**

**Town/City:**

**Post-code:**

**Country:**

**Mobile phone:**

**Work phone:**

**Home phone:**

**Email:**

**Contact by email:** Yes

**Is a trade competitor:** No

**Directly affected:** Yes

**Consent support/hearing details**

- CRC204106: oppose | NOT to be heard | will NOT consider joint hearing
- CRC204107: oppose | NOT to be heard | will NOT consider joint hearing
- CRC204143: oppose | NOT to be heard | will NOT consider joint hearing
- CRC211629: oppose | NOT to be heard | will NOT consider joint hearing
- RC205104: oppose | NOT to be heard | will NOT consider joint hearing

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**Reasons comment:**

The proposed activity is in a highly inappropriate location, see attached document giving reasons

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**Consent comment:**

1. To decline the application on the grounds that it poses a number of significant nuisance factors so close to a large residential population. 2. To direct the applicant to search for a more suitable site in the wider rural area which will not adversely impinge on a neighbouring population of residents, and having a less harmful effect on the immediate environment.

## Reasons for Opposing

### Acoustic Bunds

I quote: "A bund, is a containment around an area where liquids are handled, processed or stored. The type of bund most often seen consists of four walls and a base surrounding a tank. If the tank leaks, the leakage will be contained by the bund." *Environmental Consultants, UK*. <https://www.enviro-consult.com>. Bunding therefore implies **containment**, with no release beyond the perimeter of the bund.

Constructing earth bunds surrounding the proposed excavation site cannot provide any worthwhile containment of noise from the proposed site. The bunds surrounding the existing Taggart site off Cones Road demonstrates this to be factual. The activity on this site is plainly audible where I live 500 metres away, despite an earth bund and shelter-belt tree planting.

In order to achieve any worthwhile degree of "acoustic suppression", earth bunding would need to be constructed at an enormous scale and height. At best, earth bunds can only be described accurately as "aesthetic" in value, screening the site from view.

### Dust Mitigation

Mitigation, by definition, is "the action of reducing the severity, seriousness, or painfulness of something".

Hot, drying winds at anytime during the day or night, whether or not there is activity on site, will generate dust storms. Regardless of the prevailing weather conditions, excavation will release dust into the atmosphere and it will be dispersed hundreds to many thousands of metres from the site. There will be no escape for the inhabitants from dust contamination of their homes and gardens due to the extremely close proximity of the Racecourse to the large areas of adjacent residential property.

The proposal of spraying water at the excavation site can only have limited effectiveness, as witnessed by the activity at deconstruction sites in Christchurch following the 2011 earthquakes and the suppression of stockpiled coal dust at Cashin Quay, Lyttelton. Best practice dust mitigation will require round the clock monitoring and automation measures.

### **Flood Water**

The quarry location is recognised to be in a flood prone location of medium/high risk and adjacent to areas of high risk (<https://waimakariri.maps.arcgis.com/apps/MapSeries/index.html?appid=16d97d92a45f4b3081ffa3930b534553>).

A future of more severe weather conditions (high winds, dry conditions and high rainfall), increases the chance that flood prone areas will be more frequently affected by high rainfall events. Excavation on this site so close to or within a high risk area, and backfilling excavation with soil adds additional problems in a flood event, scouring the backfill and dispersing it in flood waters.

### **Traffic Density**

Trucking the quarry loads along River Road will cause a dramatic increase in traffic volume. Already River Road is a main arterial route for stock trucks, milk tankers and it is a public transport bus route. The residential section of River Road is a 50 kph speed zone, increasing to 80 kph along the Racecourse boundary.

The residential section has a well used footpath and I have often witnessed that traffic is seldom observing the speed restrictions. The road width is narrow and the extra daily truck movements between the Racecourse and Cones Road, suggests road widening would be advisable. A more desirable alternative would be to make a dedicated track between the Racecourse and Cones Road, across open land, and not to use River Road.