



SECTION 96 RESOURCE MANAGEMENT ACT (RMA) 1991

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

OR: Email: [hearings@ecan.govt.nz](mailto: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**

CUSTOMER SERVICES		
EC - CHCH		
FILE REF:		
DOCUMENT No.:		
27 NOV 2020	ACTION	INFO
TIME RECEIVED:		

### A. PERSON/GROUP/ORGANISATION MAKING SUBMISSION

Full name of submitter:

Wendy Jane Withell

Postal address for  
Service:

Postcode:

Contact Phone:

Private:

Work:

Cell

Email Address:

Contact Person:

Wendy Withell

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 ~~do~~ 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)*

my Submission relates to the entirety  
of the application.

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

See attached appendice

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

I oppose the proposal

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

24-11-2020

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.

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

**CRC204106 - land use to establish, maintain and operate an aggregate quarry-**

Taggarts Earth Moving have applied under the Resource Management Act 1991 to change the land use for the purpose of Quarrying activities.

This challenges the very core of the act where the sole purpose is to- Promote the sustainable management of natural and physical resources.

The act continues to clarify that "Sustainable management means managing the use development, and protection of natural and physical resources in a way, or rate which enables people and communities to provide for their *social, economic and cultural well-being and for their health and safety*"

The applicant's case for the change of use request is purely driven by the commercial profitability of the location that provides reduced transportation costs and thus increased profitability and for the economic sustainability of the Rangiora Racecourse. This would appear to be a mutually beneficial commercial arrangement that does not consider the well being and/or the health and safety of the local community.

I will bring it to the attention of the panel the effects such proposed quarrying activities will bring upon the local community-

This will include but will not be limited to-

- Respiratory health effects to residents brought about by silica dust from a poorly mitigated proposal.
- Mental health effects on residents brought about by the expected capital reduction to property values in the North West Rangiora Area.
- Mental health effects brought about by noise and vibration caused by the operation of machinery.
- Increased maintenance to resident's properties in cleaning and meeting warranties to building envelopes.

The act notes- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations: The use of the bore water at the Racecourse does not meet the criteria of sustaining resources for future generations and more information will be provided at the hearing.

The act notes- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems: The safeguarding of these life supporting elements will be compromised by way of contamination across all elements.

To elaborate, the dust to air, the depth of excavation to water table, un-controlled use of water and the backfilling to soil will have levels of contamination when commercial operators are driven by profitability in a largely un-regulated environment.

More information will be provided at the hearing as to how the proposal does not meet the very essence of the RMA for the matters of dust, water, and contamination to soil and the effects of this to the wider health and safety of the community.