

6 May

**Before Independent Hearing Commissioners Appointed by Canterbury Regional Council (ECAN)
and the Waimakariri District Council (WDC)**

In the Matter of: The Resource Management Act 1991

And

In the Matter of: Taggart Earthmoving Limited's application for resource consents to establish a new aggregate quarry at the Rangiora Racecourse located at 309 West Belt, Rangiora.

Statement and Evidence of: Heather Mather.

Introduction:

My name is Heather Mather and I live in Nth West Rangiora

I am retired but in my working life have been a teacher, Head of Department and a Deputy Principal in secondary schools throughout New Zealand and in Newcastle, New South Wales, Australia. I have also been an Advisor to Schools and was part of national team that developed and implementation of the current New Zealand Technology Curriculum.

My specialities are Nutrition and Health and Wellbeing.

I am very concerned about this quarry application on the health and the wellbeing of my neighbours and my family.

The environment of my neighbourhood could be described as leafy, quiet and comfortable. In my mind it is a good example of a quality housing development. I acknowledge the age profile of the community is weighted towards older people but there are young families who also reside in the area. It is an area where my husband and I chose to live following the Canterbury Earthquakes and having the trauma of our home being "red-zoned". I am also aware that our experience of devastation from this horrific event is shared by a number of people in our community.

We chose to live in this area, in part because it was adjacent to the Rangiora Racecourse – a long standing recreational amenity. We enjoy the way our lifestyle is complemented by the proximity of the racecourse as we like going to the races on a nice day and taking our son and his family for a day out. On cooler days we always watch the races on TV and enjoy seeing the setting – in my opinion it is one of the more picturesque racing venues in New Zealand and a great advertisement for Rangiora. We have also grown to enjoy hearing the commentary on trial and race days and when the wind is in the right direction the noise of the horses running.

We did our due diligence carefully before we purchased four years ago. We were encouraged by the way the land had performed during the Canterbury earthquakes and were confident the development had followed sound engineering practices. Following our experience in Christchurch we felt confident about our choice.

We now know that our purchase was about six months after this quarry proposal had commenced. Three and a half years later when I found out about the proposal for a racecourse quarry, I was shocked. I had never heard of such an outrageous proposition. I still can't find any evidence where an operational racecourse co-exists with a noxious quarry. Nor can I find any evidence where a quarry has ever been established without a reasonable buffer zone from a neighbouring urban community with homes, lodges, campsites, religious venues, shops, a hotel, restaurants, pre-schools, schools and retirement homes.

I have spoken to many people in Rangiora about this quarry application and they are equally shocked, however, many are of the opinion it will not proceed, mostly for the reason that it would be too close to a suburb and also because of the risk to the water-table.

One of the issues I have with the current application and the subsequent reports is the total lack of analysis of future potential liquefaction at the racecourse if the proposal was approved and filled in as planned. There is no discussion, data or evidence on this. I did note one comment which suggested if the racecourse was to be used for future residential development the fill would need to be the same as is proposed to be quarried. This is alarming! Enabling the degradation of the environment for potential future use means this application should not proceed. I have also noticed a remarkably poor response in respect of rehabilitation in the application and subsequent reports. On this basis as well, the application should be rejected. Rehabilitation is a requirement in the RMA legislation.

Establishing a quarry on a working racecourse is nonsensical on so many fronts:

- compatibility with a neighbouring urban area;
- the welfare of horses, trainers and patrons; and
- Health and Safety requirements for public, staff, trainers, riders and drivers at training sessions, trials and race-days.

My submission today will focus on the health impacts and community wellbeing as a consequence of noise and additional dust discharges into the air.

When I talk about wellbeing I mean being in a state of comfort and happiness, feeling secure, safe and able to relax. Neither my neighbours or I should have to feel the levels of frustration and anger about this matter that we do. It is not right, reasonable or acceptable that this application has already impacted so significantly on the wellbeing of our community.

Health Concerns

Dust generation from the activities proposed in the quarry is a major concern. I have lived in many places in New Zealand and Australia, but I have to acknowledge that I have never lived in such a dust prone area as Rangiora. My husband tells me that it is the problem of living in Canterbury – he is a Geographer and persists in giving me the lesson about wind-blown dust and dirt called loess that created the soils of Canterbury.

I respond by saying it wasn't like this in Christchurch or West Eyreton and give him the example of our glass top outdoor table that needs cleaning after lunch and before tea. My husband teases me by saying wait until the quarry and we will have to clean it before afternoon tea as well – I suspect he is right. Take it from me – my lived experience of dust in North West Rangiora is real evidence and even the slightest possibility of more dust should not be contemplated. I am confident my evidence is more reliable than the desk top exercise that is outlined in the quarry application

followed up mostly with assertions or evidence that is contested in subsequent reports. Saying an affect is less than minimal and therefore negligible doesn't make it so!

When I first heard about the quarry, I wrote to Canterbury Public Health on the basis that trusting in health advice was standing us in good stead last year during Covid 19.

Their response in relation to dust was:

“The Canterbury District Health Board’s responsibility is to promote the reduction of adverse environmental effects on the health of people and communities and to improve, promote and protect their health pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956, This complements the purpose (s5) of the Resource Management Act 1991. To promote the sustainable management of resources in a way which enables communities to provide for their health and safety.

Quarrying has the potential to cause a number of health effects if not managed effectively. The most common symptoms experienced during a period of high dust exposure are irritation to the eyes, ear, nose, throat and upper airways. Small or fine particles (i.e., particles less than 10 um) can get deeper into the respiratory tract and lungs and may cause breathing related problems,

The Canterbury District Health Board (CDHP) has a number of concerns in relation to the current application.”

Two recommendations that had been forwarded to Ecan on 13 March 2019 were attached:

- That continuous monitoring for PM10 be made a consent requirement; and,
- That the Victoria Environmental Protection Agency 2013 – Guideline for recommended separation distances for industrial residual air emissions be applied to this application.

I am aware that the set-back of 500 meters in the table on page 9 of the Victoria guideline is disputed by some submitters. The table clearly indicates that if Respirable Crystalline Silica RCS is present and I have seen no evidence disputing this, the set-back must be 500 metres. I do not understand how you could read the table any other way.

Noise is a very annoying nuisance factor and I am very aware that it affects people differently. For example, I do not get upset by aircraft noise but a neighbour moans when there are lots of small plane manoeuvres in and out of the Rangiora airfield. Large trucks on West Belt, particularly if they are empty and bounce and shake along the road worry me and on still days and nights the noise coming from River Road, from large truck and trailer units when they bounce through the dip on River Road between Ballarat Road and West Belt, frightens me. I worry about how people who are shift workers, who wear hearing aids and are frail and bedridden will cope with any additional noise from a noxious quarry. I am aware of the size of equipment to be used for extraction, stockpiling, loading, and the associated truck movements to carry gravel to Cones Road plus the many truck movements to bring in fill. The prospect of noise exceedances for a number of years is causing me anxiety and feelings of distress.

I have lived in a rural area on a small holding and have experienced noise associated with large farm machinery, irrigation systems and bird scarers. At no time did this impact on my fears associated with noise – they were never ceaseless or for long periods of time. I also understood and accepted that I had chosen to live in a rural area and that such noises were associated with my choice. I can

assure you that I do not accept any additional noise that could come from such a noxious industry adjacent to my urban neighbourhood.

As indicated above I am aware of the recommendation from Community and Public Health of the Canterbury District Health Board. (CPH CDHB) about using the setback distances from the Victoria Environmental Protection Agency, 2013, table on page 9,

I am also aware of "The RMA Quality Planning Resource 2013" Pages 25 to 32 about dust and noise issues and effects. I know these are guidelines, but they have been formulated and endorsed by the Aggregate and Quarry Association of New Zealand (AQANZ), the Ministry for the Environment and Local Government New Zealand. This quality planning resource quotes examples of how Local Authorities throughout New Zealand have developed appropriate requirements in their District Plans to deal with issues of dust (Pages 34 - 36) and noise (Page 29) associated with quarrying. For both dust and noise discharges they give examples of 500 metre buffer zones or setbacks.

I do not know why the Waimakariri District Council or Environment Canterbury have not used this significant resource. Perhaps it hasn't been brought to the attention of the Council. When I mentioned them in a letter to the Chief Executive of Ecan she indicated in her reply dated 5 February 2021 that she was aware of the Best Practice Guidelines. I will be seeking the opportunity to speak to an Ecan Council Meeting, as soon as possible, so that they are also aware and can make the appropriate changes to reflect 'best practice' and avoid the waste of emotional energy that this quarry has caused.

Wellbeing

By way of evidence for the observed levels of anger, discomfort unhappiness and feelings of insecurity and tension in the community I refer you to a petition against the quarry proposal from nearly 5,000 people; the overwhelmingly negative response to the proposal from two well attended Public meetings; and the protest actions that have been staged by local residents. For the first time in my life, I have felt so desperate and despondent that I have joined in protest action. I have been astounded to find that my experience and feelings are shared by my neighbours and this application has been the first time many of them have protested as well.

The most positive outcome of these protests has been the very high numbers of patrons and owners (estimated as close to 50%), who give us a thumbs-up and toot support for us on their vehicle horn as they enter the racecourse.

The fears and feelings I have outlined come from mature adults with extensive life experience.

In November of last year, I joined my husband at the request of a prominent local to explain this proposal and application to residents at the nearby Charles Upham Retirement Village. We showed them a video from FairGo NZ about health issues associated with quarries South West of Christchurch. We listened to evidence from residents about their life experience with noxious industries and heard about the consequential compromised health situation of some residents. Reaction to the video was very subdued apart from jeers of mirth towards an Ecan Manager explaining that local residents should now feel confident about the mitigation strategies that are now in place.

Additional Points

I need to add another few points of frustration that certainly heightened my anger towards this application because of misleading statements it contains.

- Last year when I read the application, I noticed an argument and rationale for the quarry was a wish from the Racing Clubs to continue assisting a long list organisations that they currently support (Pages 26 and 27). My neighbours and I decided to check the integrity and veracity of this list and contacted each of the listed organisations. I can confirm that one (1) organisation uses a vacant building on the site for their wrestling club in return for cleaning the grandstands after race meetings. Some of the listed organisations thought that they may have used it in the past but didn't now and certainly wouldn't if a quarry was established on site. The remaining organisations indicated they don't use the racecourse site now and certainly haven't in recent memory apart from one group that have moved to the showgrounds. I was surprised to read the s42 report and find this list was one of the criteria used by Dawson to confirm positive effects of the application.
- I can assure you that I am very aware of the changes currently underway to make the racing industry more economically viable. The enabling legislation to implement the outcomes from a review of the racing industry in 2018 is now in place – The Racing Industry Act 2020. This legislation is focussed on assisting a process of rationalisation as well as prescribing the functions, roles and duties of racing clubs. There is no way that quarrying on racing club owned land fits with these roles, duties or functions. This is made very clear in Section 21 of the Act. It was misleading to claim in the application that the racing clubs had "delegated powers to make contractual arrangements for the use of the land for other purposes". (Page 26 of the Application)
- I am concerned that the application is guilty of further omissions that make it misleading. Page 2 of the applications Introduction – Section 2.1 contains no reference to the pre-existing and adjacent suburban development on the southern sides of the site or the compact rural settlement on the western side of the racecourse or even acknowledges the large number of permanent residents – more than 100, residing at the Eco Holiday Park on the eastern boundary of the racecourse.

This omission is mind boggling. Where is the evidence or due diligence in the application that indicates the concerns of people in the neighbourhood have been reasonably considered? (see page 9 of "The RMA Quality Planning Resource, 2013").

Conclusion

This proposal to site a quarry on a recreational amenity so close to an urban residential area needs to be rejected in its entirety.

The people issues I have outlined today are real impacts on the human environment or the "sensitive receptors" the term that appears to be used in the application and subsequent reports to further mislead and dehumanise.

These people issues fit within the scope of this RMA process as much as the artificial constructs of plans, rules and land designations. This is especially so when these constructs aren't based on "best practice"!

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People matter - he tangata, he tangata, he tangata. What is most important? - it is people, people, people.

Heather Mather

6 May 2021