

**BEFORE INDEPENDENT HEARING COMMISSIONERS APPOINTED BY CANTERBURY
REGIONAL COUNCIL AND WAIMAKARIRI DISTRICT COUNCIL**

IN THE MATTER Of the Resource Management Act 1991 (**RMA** or **the Act**)

AND

IN THE MATTER Of the Waimakariri River Regional Plan (**WRRP**); the Canterbury Land and Water Regional Plan (**LWRP**); the Proposed Plan Change 7 to the LWRP (**pPC7**) and Proposed Plan Change 2 to the WRRP (**pPC2**); the Canterbury Air Regional Plan (**CARP**) and the Waimakariri District Plan (**WDC**)

AND

IN THE MATTER Of applications to the Canterbury Regional Council by **Woodstock Quarries Limited** for various resource consents to establish and operate a hard rock quarry and a landfill (**CRC214073-CRC214077**)

AND

IN THE MATTER Of an application to the Waimakariri District Council by **Woodstock Quarries Limited** for resource consents to establish a landfill and associated earthworks at 513 Trig Road within an area currently being used as a quarry (**RC215276 / 221101189245**).

**STATEMENT OF EVIDENCE OF DARRYN JAMES SHEPHERD
ON BEHALF OF WOODSTOCK QUARRIES LIMITED
29 SEPTEMBER 2023**

Presented for filing by:

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- 1 My name is Darryn James Shepherd. I am making this further statement to respond to the evidence of Shirley Hayward, in which she supplied photos showing the build-up of a shingle scree at the boundary point between WQL's property and the Narbey property.
- 2 I visited the area prior to the last 2 hearing days of this application.
- 3 WQL has no earthworks / quarry operations that physically could cause or allow spoil to enter Woodstock Stream at any point, either from the valley or from uphill quarry pits.
- 4 In my view, the shingle that Ms Hayward saw entered Woodstock Stream from the Coal Creek Station (CCS) property, further upstream from WQL.
- 5 By way of background, WQL originally owned all of what is now the CCS property. About 22 years ago, we developed a bare block of about 650ha for deer farming. At that time, there was no developed access into what is now the CCS property.
- 6 At the time we purchased the property, there was an old farm track running down the hill in a westerly direction, from the back of the deer shed. This is now a lane, and the Commissioners may have travelled down it on their site visit to CCS. This farm track was the only way, at purchase time, for us to access the land to the east, through the cut in the shingle hillside.
- 7 In any reasonably significant rain event, the lane formed in the shingle hillside would wash out to varying degrees, usually against the side bank to the south side, with occasional partial fence failures. Then, when the scouring was deep enough to be annoying, it would be easily reshaped, as the area is a shingle formation along the majority of its length.
- 8 This lane runs directly downhill to Woodstock Stream, and then the lane rises again on the other side of Woodstock Stream. At this valley point, Woodstock Stream is normally rather skinny, being near the head of the stream.
- 9 In any decent rain event, the scouring shingle takes its natural line down the hillside (now lane), ending up in Woodstock Stream, and then is washed south down Woodstock Stream. The photo at the top of page 23 in CCS' evidence shows a person standing in the scoured shingle of the lane.

- 10 In that photo, you can see that there is a large volume and area of this scoured formation. The shingle shown in the photo is the same as that which can be seen deposited in Woodstock Stream lower down, being a raw source, very pale grey, sharp, generally fine sized, fully angular sedimentary rock (greywacke). That is not a raw source material which WQL has at either of its pits. WQL's pits are formed of either the black fault crush product (Blackcap) or the solid basalt (which can only be released through blasting).
- 11 When the length of this lane is considered, it is easy to understand how quite a large volume of shingle has been washed down the lane and into Woodstock Stream.
- 12 The rainfall catchment above this point is large, and it all combines to this single, rather skinny valley point which then in turn continues to follow a valley line down past WQL's Blackcap quarry pit and to the Narbey wetland area.
- 13 I have noticed before that shingle has come down Woodstock Stream in this way, from the CCS property upstream of WQL. During the high rainfall event which many submitters have referred to, the Woodstock Stream at the entry to WQL's BlackCap pit was filled in substantially by this migrating shingle, so that what had previously been a zigzag stream path was substantially filled in and became a straighter path.
- 14 With 20 years of knowledge of this area and having farmed the land for a number of those years looking after stock in all weather, with the need to always have access to the entire farm to ensure stock could be fed and looked after, I can confidently state the shingle scree or "Escape of Spoil" as it has been characterised by the Commissioners, is a natural event, and originates from what is now CCS land.
- 15 My daughter and I often walk the bed of Woodstock Stream up from the BlackCap pit in summer for a kilometre or more to enjoy its natural beauty. In doing so, I've observed many areas of the same shingle variety in Woodstock Stream that is now evident at the WQL/Narbey border.

Darryn James Shepherd

29 September 2023