

Submission Form 16 to the Otago Regional Council on consent applications



This is a Submission on (a) limited notified/publicly notified resource consent application/s pursuant to the Resource Management Act 1991.

Submitter Details:  
(please print clearly)

Full Name/s: DOUGLAS HILTON COOK

Postal Address: [REDACTED]

Post Code: [REDACTED]

Phone number: Business: - Private: [REDACTED]

Mobile: [REDACTED]

Email address: \_\_\_\_\_

I/we wish to **SUPPORT** / **OPPOSE** / submit a **NEUTRAL** submission on (circle one) the application of:

Applicant's Name: Cromwell Certified Concrete Limited

And/or Organisation: \_\_\_\_\_

Application Number: RM20.360.01 - 04

Location: Cromwell, approximately 400 metres south southeast of the intersection of Luggate-Cromwell Road (State Highway 6) and Mt Pisa Road

Purpose: Various consents relating to gravel washing

The specific parts of the application/s that my submission relates to are: (Give details)

- DUST MANAGEMENT
- WATER DISCHARGE
- LANDFILL POTENTIAL - CONTAMINATION

My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).

I do not oppose the current quarry operation although I am directly impacted by high levels of dust originating from the quarry.

I oppose the substantial expansion of the quarry.

Please see detail in the attached document.

I/We seek the following decision from the consent authority (give precise details, including the general nature of any conditions sought)

Please see attached document.

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I/we:

- Wish to be heard in support of ~~our~~/my submission
- Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes
- No

I, am/am not (choose one) a trade competitor\* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

*\*If trade competitor chosen, please complete the next statement, otherwise leave blank.*

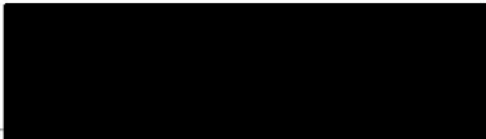
I, am/am not (choose one) directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

I, do/do not (choose one) wish to be involved in any pre-hearing meeting that may be held for this application.

I, do/do not request\* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I have/have not served a copy of my submission on the applicant.



Signatures of submitter/s  
(or person authorised to sign on behalf of submitter/s)

6-6-2021  
(Date)

Douglas Cook  
PO Box 408  
Cromwell, 9342  
6 June 2012

Otago Regional Council  
Private Bag 1954,  
Dunedin, 9054  
[submissions@orc.govt.nz](mailto:submissions@orc.govt.nz)

**Re: Opposition to RM20.360.01-04 by Cromwell Certified Concrete Ltd.**

I am the owner of Foggy Bottom Orchard (Lot 1, DP26218), located at minimum distance of 160m, directly down-wind to the south of Amisfield Quarry. This document supports my objection to the granting of resource consent RM20.360.01-04 to Cromwell Certified Concrete Ltd (CCC) for the expansion of Amisfield Quarry in regard to air quality, water discharge and the potential for the site to become a non-consented landfill.

1. **Air Quality.** I believe that the report completed by Beca Ltd (Beca), is inadequate and has failed to fully assess the wind velocities and orientations within the quarry area and its immediate surrounds. Wind strength data have been sourced from Fulton Hogan's Parkburn quarry located approximately 2.5km south of Amisfield Quarry. There are multiple data collection sites located within the area immediately surrounding Amisfield quarry, these being Harvest NZ online weather recording stations, that include continuous records of wind strength and direction. Beca appears to have made no attempt to use these data, instead relying on distal data from Parkburn to be relevant to Amisfield site. I request that there be a detailed analysis of all data from surrounding weather stations prior to submission of the application for resource consent.

To date, the management at Amisfield Quarry have failed to manage dust generation from the site during high wind events. Beca claims that dust management practices, including ceasing operations within 100m of the site boundary will mitigate the discharge of particulate matter into the atmosphere. This assumes that the active quarrying operations are the source of the dust, however it is clear from experience to date that strong wind will generate dust clouds that carry at least 500m down-wind, irrespective of whether the active quarrying has ceased or not. Such dust generation has negative impacts for the health of workers in the orchard and for the health of the trees, resulting in reduced cropping yields and resistance to disease.

Should the consent be granted, I request that the following conditions be placed on CCC;

- i. Restrict the area of the active (dust generating) quarry to an area no larger than the existing quarry (current footprint) at any one time.
  - ii. Set maximum allowable total suspended particulate (TSP) levels that CCC must comply with.
  - iii. Enforce a robust, transparent and independent dust monitoring programme at various sites outside of the quarry to monitor the TSP concentrations. The results of such monitoring must be freely available to the public.
  - iv. Impose a condition that enforces complete shutdown of the quarry in conjunction with active dust suppression measures during periods when the mean wind speed exceeds a defined threshold.
2. **Water discharge.** The consent application prepared by CCC fails to address, and in fact dismisses entirely, that process water may be discharged into a watercourse, notably

indirectly into the local aquifer. It is not clear whether the floor and in-quarry sumps of the proposed, expanded quarry will breach the underlying water table/aquifer. In any case, it seems logical that the quarry will rupture any overlying impermeable strata that currently protect the aquifer from surficial contamination. The use of dust suppression chemicals and the possibility of the quarry being used as a landfill (as has been alleged to have occurred to date, see below) mean that there is a very real potential for toxic chemicals to leach into the ground water system, which is a source of potable and irrigation water in the immediate vicinity of the quarry.

I believe that there has been insufficient analysis of the potential for contamination of this aquifer. Prior to granting of any consent to expand the quarry, the Otago Regional Council (ORC) must enforce a minimum of 12 months of quarterly monitoring of all water bores located within a 1km radius of the proposed expanded site to establish a minimum base-line data set sufficient to compare against future readings from on-going aquifer monitoring.

Should the consent be granted, I request that the following conditions be placed on CCC;

- i. CCC must carry out biannual monitoring of all water bores within a 1km radius of the planned operations by an independent agent. Water samples to be taken according to industry best-practise and be analysed for chemical and biological contaminants. The resulting data must be made available to the general public.
- ii. CCC must not be permitted to allow any material originating outside of the site to be brought onto the quarry. This is alleged to have been occurring to date.
- iii. CCC must prepare and make public a detailed quarry closure plan that demonstrates how the aquifer will be protected and the site rehabilitated to ensure no dust is generated.

3. **Landfill.** The consent application documents do not discuss the potential for foreign and possibly contaminated material being trucked onto the site to be dumped as back-fill, potentially as a commercial arrangement. This has been alleged to date and photographic evidence has been sighted.

If such practices were allowed to occur, then there is a high likelihood that toxic contaminants would leach out of such backfill and enter the underlying aquifer/water table via the highly porous and permeable glacial outwash gravel, which is the commercial product of the quarrying operation. If it is planned that the site become a landfill, then the resource consent application must state this objective and comply with consent conditions for operating a landfill.

Should the consent be granted, I request that the following conditions be placed on CCC;

- i. CCC, or any subsequent owner of the operation be strictly prohibited from importing any foreign material for disposal into the quarry as landfill.

In conclusion, I object to the granting of a resource consent to CCC for the expansion of Amisfield Quarry on the basis of the following;

- i. There has been insufficient analysis of the potential environmental impacts, notably wind born particulates impacting the health of residents, horticultural workers and horticultural crops. There is abundant local data available but this has not been evaluated.
- ii. There has been a misrepresentation of the discharge of water into a water course, notably the underlying aquifer/watercourse. This activity must be evaluated, including collection of baseline data prior to any expansion of the operation being granted
- iii. There is a risk that foreign and potentially contaminated material will be transported onto the site and dumped as back-fill and that contaminants will leach into the underlying water table. This must be specifically forbidden as a condition, should consent be granted.

I support the submissions of other parties objecting to the consent in relation to the air and groundwater contamination, and excessive noise.



Douglas Cook  
06/06/2021