

Please attach additional sheets if there is not enough space for your submissions. If you do not wish to use this form, please ensure that the same information required by this form is covered in your submission.

2 This is a submission on an application from (name, address & activity) –

Please see attached submission

3 Trade competition

Select one	☐ I am	a trade competitor for the purposes of section 308B of the Resource Management Act 1991.
	☒ I am not	
Select one	☒ I am	directly affected by an effect of the subject matter that –
	☐ I am not	(a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition

4 Attendance at Council hearing

Select one	☒ I do	wish to be heard (attend and speak at the Council hearing) in support of my submission
	☐ I do not	

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

☐ Yes
☐ No

5 The specific parts of the application that my submission relates to are:

Please see attached document

6 My submission is either in part or all: ☐ In support ☐ Opposed ☒ Neutral

The reasons for my submission are:

Please see attached submission

7 I seek the following decision from the consent authority:

(Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought)

8 Hearings Commissioners

Select one	☒	I request	that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.
	☐	I do not request	

9 Signature of submitter *(note: a signature is not required if you make your submission by electronic means, however please type your name below)*

Name and Signature of submitter:
(or person authorised to sign on behalf of submitter)

Kelly Bouzaid

Dated

Notes to submitter

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

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.

You must serve a copy of your submission on the applicant as soon as reasonably practicable after you have served your submission on the consent authority.

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.

SUBMISSION ON RESOURCE CONSENT APPLICATION – 3831 CAMBRIDGE ROAD

Submitter: Kelly Bouzaid

Property Address: [REDACTED]

LU/0231/25 ResourceCo Ltd 3831 Cambridge Road, RD 3, Cambridge Establish and operate a managed fill activity

Introduction

I am the owner of property at 3791 Cambridge Road and have been identified as an affected party under the limited notification process for the above resource consent application.

This submission is made solely in my capacity as a neighbouring landowner. While I am Chief Executive of the Cambridge Chamber of Commerce, the Chamber is not making this submission and has no involvement in the preparation of this document.

Position

My submission is not intended to oppose resource recovery activities in principle. Rather, it reflects genuine concern that the environmental risks associated with this particular proposal have not yet been sufficiently understood or addressed.

Given the uncertainty surrounding groundwater protection, environmental quality, cumulative effects and long-term public confidence, I respectfully submit that consent should be deferred until the Hearing Panel is satisfied that these matters have been comprehensively investigated and independently verified.

Reasons for Submission

1. Cumulative Effects

While previous consents may have considered individual activities and traffic movements, the cumulative effect of the operation has become increasingly significant over time.

The scale and intensity of activity now occurring on the site has materially changed the character of the surrounding rural environment and the effects experienced by neighbouring properties.

I am concerned that the current application does not adequately address these cumulative effects.

2. Traffic and Safety

The increase in heavy vehicle movements continues to raise concerns regarding:

- Traffic safety along Cambridge Road and surrounding intersections.

- Noise associated with truck movements.
- Dust generation from vehicle activity.
- The overall industrialisation of what remains a rural environment and a growth cell for the future.

The proposed increase in movements should not be considered in isolation from existing traffic volumes already generated by the site and surrounds.

Residents along Pope Terrace and Cambridge Rd have already felt the impact and effect of escalating truck movements using this corridor.

Is this application being considered within the Cambridge Connections discussions and framework?

3. Dust and Air Quality

Dust remains one of the most significant concerns experienced by neighbouring properties.

Dust affects:

- Outdoor enjoyment of residential properties.
- Animal welfare.
- General amenity values.
- Confidence that contaminants are being appropriately managed.

Whilst I acknowledge recent sealing on site, there is still a significant amount of dust settling on neighbouring properties, and in fact further afield.

Any future consent should include robust monitoring, reporting and enforcement provisions relating to dust generation.

As a neighbouring property owner, I have a reasonable expectation that the rural amenity of the area—including clean air, manageable traffic levels, low noise, visual openness and a safe environment—will be maintained. I am concerned that the proposed intensification will progressively erode these amenity values.

I am requesting a bund and planting on the boundary closest to my property to assist mitigation in this space.

4. Noise and Amenity

The ongoing operation has resulted in noticeable impacts on rural amenity through vehicle movements, operational activities and associated site effects.

An extension of operations on a Saturday is opposed.

The surrounding area is characterised by rural-residential and productive land uses. The scale of activity proposed is increasingly inconsistent with the expectations of neighbouring landowners.

What will be the cumulative effect these matters have on the quality of the surrounding rural environment noting many of the neighbour's collect rainwater from their roofs and grow their own produce to eat.

5. Fire Risk and Community Confidence

The recent fire event at the site has heightened concerns within the local community regarding operational management and risk mitigation.

I have been advised that Council has not been involved in investigating the fire but are working to assess the suitability of the Fire Management Plan.

The Fire Management Plan says the site manager will undertake a cause investigation if there is a fire. FENZ indicated that for a fire outside, investigation would likely be limited to an assessment made by officers at the time and that assessment suggested spontaneous combustion of the timber pile. We also understand that FENZ are working with the operator to support their fire management/prevention practices.

The event has understandably affected community confidence in the site's ability to manage potential adverse effects.

Resource Co have themselves acknowledged their inexperience in this type of operation, and consent conditions should recognise that many of their plans will be untested until an incident prevails.

I request that Council carefully consider whether sufficient safeguards are in place before approving any increase in activity.

Relief Sought

I request that Council:

1. Impose substantially strengthened conditions including:
 - Independent dust monitoring and reporting.
 - Enhanced traffic management requirements.
 - Restrictions on operating hours. Specifically, Saturday afternoons.
 - Regular compliance reporting available to affected neighbours.
 - Clear enforcement mechanisms for breaches of consent conditions.

- Independent review of fire prevention and emergency management measures.

6. Site Monitoring and Camera Systems

Given the scale of the proposed operation and the reliance on operational controls to manage environmental effects, I respectfully request that the Hearing Panel consider requiring the installation and maintenance of a comprehensive, fit-for-purpose camera monitoring system across the site.

This should include high-definition CCTV coverage of operational areas together with Automatic Number Plate Recognition (ANPR) technology at all site entry and exit points.

The purpose of such a system would be to:

- provide an accurate record of all vehicle movements entering and leaving the site;
- verify compliance with consented operating hours, vehicle numbers and authorised activities;
- assist in confirming the origin and nature of materials being accepted at the site where required;
- support investigation of any alleged unauthorised dumping or inappropriate material acceptance;
- provide objective evidence where there are complaints regarding noise, dust, traffic or other consent compliance matters; and
- enable both the consent holder and Council to efficiently investigate any alleged breaches of consent conditions.

An independently retained digital record would provide transparency for all parties and help resolve disputes based on factual evidence rather than recollection. It would also provide reassurance to neighbouring landowners that consent conditions are being actively monitored and enforced.

Given the duration of the consent sought and the potential environmental consequences should consent conditions not be met, I consider this to be a reasonable, practical and proportionate requirement consistent with modern environmental management practices.

Statutory Considerations

In my view, the application does not provide sufficient evidence to satisfy a number of key matters required under the Resource Management Act 1991 (RMA). The concerns outlined below are based on the information available to me as an affected neighbouring property owner and are raised for the Hearing Panel in considering whether the application has adequately assessed and addressed potential environmental effects.

1. Section 5 – Sustainable Management

Section 5 of the RMA requires the sustainable management of natural and physical resources, including safeguarding the life-supporting capacity of air, water, soil and ecosystems.

I am concerned that the application does not adequately demonstrate how this objective will be achieved given:

- the potential for groundwater contamination associated with quarry infill and long-term leachate generation;
- uncertainty regarding the site's hydrogeology and groundwater movement;
- the potential for adverse air quality effects, including dust, diesel emissions and other airborne contaminants;
- increased noise, vibration and heavy vehicle activity affecting neighbouring properties; and
- the uncertainty surrounding environmental outcomes over the proposed consent duration.

Given the potentially irreversible nature of groundwater contamination, I question whether the application adequately safeguards environmental systems for future generations.

2. Section 6 – Matters of National Importance

Section 6(e) requires decision-makers to recognise and provide for the relationship of Māori with their ancestral lands, water, sites, wāhi tapu and other taonga.

Water is a taonga, and the protection of its mauri is fundamental.

Should contaminants migrate into groundwater or connected water systems, the effects may extend well beyond the site itself. I am concerned that the application does not adequately assess these risks or demonstrate how the mauri of groundwater and connected waterways will be protected over the long term.

4. Section 8 – Principles of Te Tiriti o Waitangi

Section 8 requires decision-makers to take into account the principles of Te Tiriti o Waitangi.

I respectfully submit that the Hearing Panel should carefully consider whether the application demonstrates sufficient regard for:

- protection of taonga such as water and land;
- the principle of active protection;
- the precautionary approach where uncertainty exists; and
- any environmental frameworks or concerns raised by mana whenua during this process.

These considerations are particularly relevant where long-term environmental risks may affect shared natural resources.

5. Section 104 – Assessment of Environmental Effects

Section 104 requires consideration of all actual and potential environmental effects.

I question whether the Assessment of Environmental Effects (AEE) adequately addresses a number of important matters, including:

- groundwater pathways and hydrogeological uncertainty;
- vibration effects;
- peak operational noise;
- cumulative traffic effects;
- long-term contaminant management; and

Where significant uncertainty remains, I submit that additional independent assessment should be obtained before any decision is made.

6. Relevant Planning Documents

The Hearing Panel must also have regard to the relevant provisions of the Waipā District Plan and the Waikato Regional Plan.

In my view, further consideration should be given to whether the proposal is consistent with objectives and policies relating to:

- groundwater protection;
- land contamination;
- air quality;

- rural amenity;
- transport safety; and
- protection of sensitive neighbouring land uses.

7. Discharge Effects

The application should also be carefully considered in relation to potential discharges to land and groundwater.

Given the nature of the materials proposed to be placed within the quarry, I remain concerned about:

- possible contaminant migration;
- long-term leachate generation;
- stormwater management;
- emergency response following fire events; and
- the sensitivity of the receiving environment.

I am not satisfied that sufficient certainty has been provided to conclude these risks can be effectively managed throughout the life of the consent.

8. Precautionary Approach

Where scientific uncertainty exists, but the potential consequences are significant or irreversible, I respectfully submit that a precautionary approach should be adopted.

In this case, uncertainty appears to remain regarding:

- groundwater behaviour;
- contaminant containment;
- long-term environmental monitoring; and
- the cumulative effects of continued operational expansion.

Given the potentially permanent consequences of groundwater contamination, I submit that the applicant should bear the burden of demonstrating that these risks are acceptably low. I think this is a worthwhile point to raise. Rather than framing it as a prediction that the operator will fail, frame it as prudent risk management over the life of a long-term consent. Financial assurance (often called a bond or security) is a recognised mechanism under the RMA to ensure remediation costs do not fall on the community.

9. Financial Assurance and Site Remediation

A further concern relates to the long-term financial responsibility for the site.

The consent sought extends over many years and involves activities that have the potential to create ongoing environmental liabilities requiring active management and, ultimately, site rehabilitation.

While I make no assumption regarding the financial position or future viability of the applicant, it is prudent for the Hearing Panel to consider the potential consequences should the operation cease, ownership change, or the consent holder become unable to meet its environmental obligations.

As a neighbouring property owner and ratepayer, I am concerned that, in the absence of appropriate financial safeguards, the cost of environmental remediation, site stabilisation, contamination management or ongoing monitoring could ultimately fall to the wider community and local ratepayers.

I respectfully request that the Hearing Panel consider requiring an appropriate financial assurance, such as a bond or other security, sufficient to cover the reasonable costs of:

- site rehabilitation and closure;
- remediation of any contamination;
- ongoing groundwater and environmental monitoring where required;
- management of unforeseen environmental events; and
- any works necessary to ensure the site remains environmentally stable following cessation of operations.

Such a requirement would provide confidence that environmental obligations will continue to be met regardless of future ownership or commercial circumstances. It would also ensure that the financial risks associated with the activity remain with the consent holder, rather than being transferred to neighbouring landowners or the wider community.

Given the scale of the proposed activity and the potential long-term environmental consequences, I consider a financial assurance to be both reasonable and consistent with the principles of prudent environmental management.

I would also recommend asking for a five-yearly independent review of the bond amount. As the volume of material placed on site increases, the potential remediation cost may also increase. A periodic review ensures the financial assurance remains adequate throughout the life of the consent, rather than being fixed at today's estimated cost.

Conclusion

As an immediately affected neighbouring landowner, I have experienced the cumulative effects associated with activities at this site and remain concerned that the proposed increase in activity will further erode the amenity, safety and enjoyment of surrounding properties.

I respectfully request that Council give careful consideration to the lived experience of neighbouring property owners when assessing this application.

I wish to be heard in support of this submission if a hearing is held.

Yours faithfully,



Kelly Bouzaid

