

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) –

ResourceCo Limited
Consent ID: LU/0231/25
Location: 3831 Cambridge Road, Cambridge (formerly Sandford Sand Quar

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:

See attached document

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

The reasons for my submission are:

See attached document

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)

See attached document

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: <i>(or person authorised to sign on behalf of submitter)</i>	John Deane	Dated 28/06/26
	Helen Deane	

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: John and Helen Deane

Property Address: [REDACTED]

Introduction

We are the property owners of 3797 Cambridge Road. We have been identified as an affected party under the Limited Notification Process for the above resource consent application.

Position

While we do not oppose the principle of resource recovery, this submission reflects genuine concerns regarding this specific proposal. Specifically, the associated environmental risks have not yet been sufficiently understood or addressed.

We respectfully submit that consent should be deferred. This deferral should remain until the Hearing Panel is satisfied that groundwater protection, environmental quality, cumulative effects, and long-term public confidence have been comprehensively investigated and independently verified.

Reasons for Submission

1. Cumulative Effects

- While historic consents focused on individual activities, the existing operations cumulative effects have compounded over time.
- The expanded scale and intensity of existing operations on-site have now fundamentally degraded the surrounding rural environment.
- These localised impacts directly disadvantage neighbouring properties.
- With good reason, we are concerned that the current application does not adequately address these cumulative effects, rather it adds to them.

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.

We are aware residents along Pope Terrace and Cambridge Road have already felt the impact and effect of escalating truck movements using this corridor.

Confirmation as to whether this application is being considered within the Cambridge Connections discussions and framework would be appreciated.

3. Dust and Air Quality

Dust remains a critical issue for neighbouring properties, directly impacting outdoor enjoyment, animal welfare, and general amenity.

It also erodes public confidence regarding contaminant management on site.

Despite recent on-site sealing, significant dust still settles on neighbouring properties and further afield. Consequently, any future consent must include robust, enforceable monitoring and reporting provisions.

As a neighbouring landowner, we expect the area's rural amenity to be maintained. This includes clean air, manageable traffic, low noise, visual openness, and a safe environment. The proposed intensification threatens to progressively erode these fundamental amenity values.

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

4. Noise and Amenity

The surrounding area is characterised by a mix of productive farming and rural-residential living. Current site operations and heavy vehicle movements already cause noticeable, adverse effects on this rural amenity. Consequently, any extension of operational hours into Saturdays is strongly opposed.

The proposed scale of activity is fundamentally inconsistent with the reasonable expectations of neighbouring landowners living in a rural area which is earmarked for future residential growth.

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. It also revealed managements inexperience and lack of preparedness.

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

ResourceCo 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.

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

Consent compliance monitoring. The Resource Management Act (Section 104) requires that all actual and potential environmental effects are considered during consent assessment. These considerations have given rise to a large number of impact mitigations which site operations must successfully implement, monitor and maintain for up to two decades in order to maintain consent compliance. Difficult for an experienced investor, more so for this consent applicant who acknowledges inexperience in landfill operations. Yet, the avoidance of potentially significant environmental impact relies largely upon consent compliance.

We submit that a powerful risk mitigation tool has been overlooked in this consent application. The implementation of a suitable resolution camera recording network covering the entire site, combined with vehicle number recognition at entry and exit:

- Recorded 24 x 365, saved indefinitely.
- Available to management, Council and, through an appropriate mechanism, neighbours.

This tool would:

- Support site operations management in conforming to consent obligations, including confirming when neighbouring properties are the source of dust emissions or other environmental impacts.

- Evidence compliance with consent obligations.
- Enable piece of mind for neighbours, which may ultimately support a harmonious relationship between the site operators and the surrounding community.

Relief Sought

We hereby 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. Ideally 7am – 5pm Monday – Friday.
 - Regular compliance reporting available to affected neighbours.
 - Clear enforcement mechanisms for breaches of consent conditions.
 - Independent review of fire prevention and emergency management measures.
 - Cameras for consent compliance monitoring as mentioned with the provisos mentioned above.

Statutory Considerations

As affected neighbouring property owners, we submit the application fails to provide sufficient evidence to satisfy key requirements under the Resource Management Act 1991 (RMA).

Based on the information available, the applicant has not adequately assessed or addressed the potential environmental effects of the proposal. The specific statutory deficiencies are outlined below for the Hearing Panel's consideration.

1. Section 5 – Sustainable Management

Section 5 of the RMA mandates the sustainable management of natural and physical resources. This explicitly includes safeguarding the life-supporting capacity of air, water, soil, and ecosystems.

We are concerned the applicant has failed to discharge their evidentiary burden under Section 5. The application does not demonstrate how this mandatory objective will be achieved, given the following unresolved issues:

- Hydrogeological Uncertainty: A fundamental lack of data regarding local hydrogeology and groundwater movement.
- Groundwater Contamination: High potential for long-term leachate generation and groundwater contamination from quarry infill.
- Air Quality Degradation: Cumulative adverse effects from dust, diesel emissions, and other airborne contaminants.
- Amenity Impacts: Increased noise, vibration, and heavy vehicle activity directly compromising neighbouring properties.
- Consent Duration Risk: Compounded uncertainty surrounding long-term environmental outcomes over the proposed duration.

Because groundwater contamination is effectively irreversible, this application fails to safeguard environmental systems for future generations as required by the Act.

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 its *mauri* (life force) is a fundamental statutory obligation under this section.

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 consider the principles of Te Tiriti o Waitangi.

We 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 of the RMA mandates that decision-makers consider all actual and potential environmental effects of a proposal.

We believe the applicant's Assessment of Environmental Effects (AEE) fails to adequately address five critical matters:

- **Hydrogeological Pathways:** Significant uncertainty remains regarding local groundwater movements.
- **Vibration Effects:** Inadequate assessment of localised vibrational impacts on neighbouring properties.
- **Peak Noise:** Failure to properly model and mitigate peak operational noise spikes.
- **Cumulative Traffic:** A lack of comprehensive analysis regarding total heavy vehicle movements over time.
- **Contaminant Management:** No robust framework for long-term containment and leachate control.
- Because substantial uncertainty remains across these core areas, the Hearing Panel should direct that an independent peer review be obtained under Section 92(2) before any decision is made.

6. Relevant Planning Documents

The Hearing Panel is legally required to have regard to the relevant provisions of both the Waipa District Plan and the Waikato Regional Plan. The current proposal exhibits clear inconsistencies with the objectives and policies of these statutory plans, specifically regarding:

- **Groundwater Protection:** Risks to regional aquifers and underground water systems.
- **Land Contamination:** Long-term management of infill material and leachate.
- **Air Quality:** Management of persistent dust and localized emissions.
- **Rural Amenity:** Preserving the character, quietness, and visual openness of the zone.
- **Transport Safety:** Managing the safety risks of increased heavy vehicle movements on rural roads.

- Sensitive Land Uses: Failing to protect adjacent, sensitive residential properties from reverse sensitivity and operational effects.

7. Discharge Effects

The application requires rigorous scrutiny regarding its proposed discharges onto land and into groundwater, pursuant to standard New Zealand Technical Guidelines for Disposal to Land.

Given the specific nature of the fill materials destined for the quarry void, the applicant has not provided sufficient engineering or scientific certainty across five key risk areas:

- Contaminant Migration: Unresolved hydrogeological pathways that could allow heavy metals or toxic substances to escape.
- Long-Term Leachate: A lack of robust modelling for leachate generation and collection over a multi-decade lifecycle.
- Stormwater Integration: Insufficient separation of clean stormwater from contaminated operational areas.
- Emergency Fire Response: No clear framework to contain highly toxic, contaminated runoff water following on-site fire events.
- Receiving Environment Sensitivity: Failure to account for the vulnerability of down-gradient domestic bores and local ecosystems.

We submit that based on the current consent application, the panel cannot be satisfied that these compounding risks can be safely or effectively managed over the requested consent duration.

8. Precautionary Approach

Where scientific uncertainty exists regarding significant or irreversible environmental consequences, a precautionary approach should without doubt be adopted.

In this case, critical uncertainties remain unresolved across four key operational areas:

- Groundwater Behaviour: Incomplete modelling of localised aquifer movements.
- Contaminant Containment: Unproven long-term security of the quarry infill material.
- Environmental Monitoring: A lack of definitive, multi-decade monitoring frameworks.
- Cumulative Effects: The unquantified compounding impacts of ongoing operational expansion.

Prudent long-term consent framework is required. Rather than speculating on operational performance, responsible risk management over the lifespan of a long-term consent dictates that the applicant must bear the burden of proof.

The applicant must conclusively demonstrate that these environmental risks are acceptably low before any activity commences.

To protect the public interest, any granted consent must be conditioned with a robust **financial assurance mechanism** (such as a rehabilitation bond or security) under Section 108A of the RMA.

9. Financial Assurance and Site Remediation

Long-Term Financial Responsibility and Liability. The requested consent extends over decades and involves activities capable of generating significant, long-term environmental liabilities.

Without making assumptions regarding the applicant's future viability, prudent risk management requires the Hearing Panel to safeguard the public from potential insolvency, abandonment, or ownership changes.

In the absence of strict safeguards, the financial burden of remediation, site stabilisation, and ongoing monitoring will inevitably fall on local ratepayers and neighbouring landowners.

Relief Sought: Section 108A Financial Assurance Condition. To protect the community, we respectfully request that any granted consent include a condition requiring a robust financial assurance, such as a Performance Bond, under Section 108A of the RMA. This security must be sufficient to cover the full costs of:

- Site Rehabilitation: Complete closure and physical stabilisation of the land.
- Contamination Remediation: Clean-up of any off-site or on-site discharges.
- Lifecycle Monitoring: Ongoing groundwater, air quality, and environmental testing.
- Unforeseen Events: Emergency response funding for unexpected environmental failures.
- Post-Cessation Stability: Long-term works required after operations cease.
- Mandatory period bond review framework be included.
- Critically, this financial assurance must not be fixed at today's estimated cost.
- As the volume of infill material on site scales up over time, the potential liability and remediation costs will compound exponentially.
- Consequently, we recommend a condition mandating an **independent, five-yearly review of the bond amount**. This ensures the security dynamically scales to remain adequate throughout the multi-decade life of the consent.

Conclusion

- As an immediately affected neighbouring landowner, we have witnessed first-hand the escalating cumulative effects of this site's activities.
- We submit that the proposed intensification will irreversibly erode the rural amenity, safety, and quiet enjoyment of all surrounding properties.
- When assessing this application, we respectfully request that the Hearing Panel give full weight to the lived experiences and material concerns of the neighbouring property owners.
- Unless the applicant can conclusively de-risk these operations and provide robust financial assurances, consent should be deferred or declined.

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

John and Helen Deane

[REDACTED]

Cambridge