

NOTIFIED RESOURCE CONSENT — SUBMISSION FORM 13

Section 41D, 95A, 95B, 96, and 127(3), Resource Management Act 1991

Send to: Waipā District Council, Private Bag 2402, Te Awamutu 3840 | submissions@waipadc.govt.nz | 0800 924 723

1 Submitter Details

Full name of submitter:	Tamaryn Hankinson
Contact name (if different):	
Contact phone number:	
Email address:	
Postal address:	

2 This is a Submission on an Application From

Applicant name:	ResourceCo Ltd
Site address:	3831 Cambridge Road, RD 3, Cambridge
Activity:	Establish and operate a Class 3 Managed Fill (1,472,200 m ³ earthworks, ground levels raised up to 21 m, four stages over 10–20 years)
Application number:	LU/0231/25

3 Trade Competition

Trade competitor status:	☒ I am NOT a trade competitor for the purposes of s.308B of the RMA 1991. ☒ I AM directly affected by an effect of the subject matter that adversely affects the environment and does not relate to trade competition.
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4 Attendance at Council Hearing

Wish to be heard:	☒ I DO wish to be heard (attend and speak at the Council hearing) in support of my submission. ☒ If others make a similar submission, I will consider presenting a joint case with them at the hearing.
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5 Specific Parts of the Application My Submission Relates To

This submission relates to the application in its entirety, and specifically to:

- The Assessment of Environmental Effects (AEE) and its air quality assessment, dust management provisions, and asbestos management plan;

- The Waste Acceptance Criteria (WAC) in Table 3 and the contaminant thresholds proposed for Class 3 Managed Fill materials;
- The hydrogeological and groundwater assessment and the proposed 2-metre cleanfill buffer;
- The Site Management Plan and stormwater / leachate management provisions;
- The staging plan (Stages 1–4 over 10–20 years) and the interaction with the Deferred Large Lot Residential Zone to the south; and
- The operator's record of compliance with existing resource consents on this site.

6 My Submission is Opposed — Summary of Reasons

Position:	☒ OPPOSED (in full)
Reasons (summary):	Full reasons are set out in the attached detailed submission. In summary: 1. Demonstrated, documented dust harm to residential neighbours from current operations, supported by photographic and video evidence and multiple formal complaints. 2. Defective air quality modelling: flat-terrain meteorological modelling is scientifically invalid for a deep quarry landform. Effects on residential receptors cannot reliably be assessed as less than minor. 3. Dramatic increase in permitted contaminant thresholds: the transition from Clean Fill to Class 3 Managed Fill permits lead at 460 mg/kg (from 78 mg/kg), PAHs at 125 mg/kg (from 2 mg/kg), PFAS at up to 50 mg/kg, and asbestos — all of which can become airborne and deposit on residential properties, roof water tanks, vegetable gardens and backyard animals. 4. PFAS "forever chemicals" accepted at up to 50 mg/kg (50,000,000 ppt) against a US EPA drinking water safety standard of 4 ppt. Domestic UV and carbon filters cannot remove PFAS. Roof-fed water tanks used by neighbouring properties are a direct, unmitigated exposure pathway. 5. Unresolved hydrogeological risk: the applicant's own site manager confirmed water percolation from the southern quarry bank at the 21 June 2026 neighbour meeting. Deep fracture mapping has not been done. Section 107 RMA cannot be satisfied. 6. The receiving water environment is already contaminated from existing site activities (zinc, arsenic, copper, PFAS exceeding guidelines). The site's catchment pond is believed to be leaking. 7. Long-term land sterilisation: HAIL-listing under the NES:CS will effectively preclude residential use of this 21-hectare site without costly remediation, directly contrary to the district plan's Deferred Large Lot Residential zoning immediately adjacent. 8. Operator compliance failures: nine documented categories of non-compliance under current consented operations, plus misleading representations to neighbours about expansion plans. The consent authority cannot rely on adaptive management assurances from this operator.

7 Decision Sought from the Consent Authority

Primary relief:

9. Refuse the resource consent application LU/0231/25 in its entirety.

Alternative relief (if consent is not refused):

10. Halt all processing of the application until the applicant provides: (a) deep hydrogeological fracture mapping of the confirmed southern bank water percolation pathway; (b) quarry-specific micro-climate air quality and dust modelling that properly accounts for the bowl-shaped landform of the site at each stage of filling; and (c) a full independent audit of compliance with all existing resource consents on the site.
11. If consent is granted despite the above grounds, impose conditions including: a mandatory engineered impermeable physical barrier system between all fill material and groundwater; independent third-party (not operator-controlled) air quality and asbestos fibre monitoring at residential boundary points throughout the operational life of the fill; resolution of all identified existing consent failures as a condition precedent to commencement; and a funded drinking water testing and property soft-wash programme for all residential properties within 1.5 km of the site boundary, at the operator's expense, for the full operational life of the consent. Possible bond to be paid by operator to be held for clean up operations if consent granted and conditions not adhered to resulting in significant negative impact on surrounding area and residence.

8 Hearings Commissioners

Hearings Commissioner request:

- ☐ I request delegation to independent hearings commissioners (s.100A RMA)
- ☒ I do not request independent hearings commissioners at this time.

9 Signature

Name:
Signature:
Date:

Tamaryn Hankinson

Dated: _____

Joe Gray, Saddleback Planning Ltd — [REDACTED] (s.96(3) RMA)

**ATTACHMENT TO FORM 13 SUBMISSION
RESOURCE MANAGEMENT ACT 1991
FORMAL SUBMISSION IN OPPOSITION**

Consent Authority:	Waipā District Council
Application Number:	LU/0231/25
Applicant:	ResourceCo Ltd
Site Address:	3831 Cambridge Road, RD 3, Cambridge (Lot 1 DP 472963)
Proposed Activity:	Establish and operate a Class 3 Managed Fill (1,472,200 m ³ earthworks, levels raised up to 21 m, 4 stages, 10–20 years)
Submission Deadline:	Monday 29 June 2026
Date of Submission:	22 June 2026
Submitter Name / Address:	[REDACTED]
Wish to be Heard:	YES — the submitter requests to speak at any hearing.

1. Position and Relief Sought

This submission is lodged in strong and total opposition to the resource consent application by ResourceCo Ltd to establish and operate a large-scale Class 3 Managed Fill at 3831 Cambridge Road, Cambridge.

The submitter requests that Waipā District Council:

12. Refuse the resource consent application in its entirety; or alternatively,
13. Decline to progress the application further until the applicant provides: (a) a complete deep hydrogeological fracture investigation of the southern quarry bank percolation pathway; (b) quarry-specific micro-climate air quality modelling that properly accounts for the bowl-shaped landform at each stage of filling; and (c) a full independent audit of compliance with all existing resource consents on the site; and
14. If consent is considered despite these grounds, impose strict conditions including: a mandatory engineered impermeable physical barrier separating all fill material from groundwater; independent third-party air quality and asbestos fibre monitoring at residential boundary points (not operator-controlled); resolution of all existing consent compliance failures as a condition precedent to commencement; and a funded drinking water testing and property soft-wash programme for all residential properties within 1.5 km of the site boundary, at the operator's expense, for the full operational life of the consent.

2. Background: The Operator's Track Record and Good Faith Failures

2.1 Proximity to Residential Areas

The proposed managed fill is located immediately adjacent to an established rural-residential area. The site is bounded to the south-west and south-east by the Waipa District Plan's "Deferred Large Lot Residential Zone" — anticipated to be rezoned to live residential status post-2035, within the operational lifetime of this consent. The closest existing dwelling is

approximately 40–50 metres from the western edge of the proposed fill area. Multiple residential properties on Kaipaki Road and Cambridge Road lie within 250–400 metres.

2.2 Established Pattern of Non-Compliance with Existing Consents

The submitter has formally reported multiple compliance failures under the operator's current, far smaller consented activities. These concerns have been submitted to the relevant consent authority as a formal Request for Investigation. They include:

- Alleged acceptance of non-permitted waste materials including tyres, green waste, treated timber and food waste, with concerns that some material has been buried on site. Witnesses with direct knowledge are available to provide evidence.
- Truck movements not being consistently recorded on arrival, making it impossible to verify traffic volumes or whether load inspection and logging requirements are being met as required by existing consent conditions.
- Asbestos identified on site may not have originated from the historic tip face but may have arrived via incoming trucks. If load inspections are not being undertaken, asbestos volume and source reporting will be inaccurate.
- The volume of material stockpiled on site is believed to exceed 15,000 cubic metres — the threshold at which the resource consent requires a Site Management Plan covering weather monitoring, vehicle movements and stormwater management. To the submitter's knowledge no such plan has been implemented. Photographic and video evidence is held by persons with operational knowledge of the site.
- The integrity of the sealed pad beneath the stockpile is believed to have been compromised by the size and weight of the waste pile. If damaged, protection of nearby watercourses may already be breached. Photographic evidence reportedly exists.
- No effective fire prevention or suppression measures appear to be in place despite the size and composition of the waste pile and previous warnings from industry professionals. A fire at this site would generate toxic smoke with severe impacts across the Cambridge area.
- Required sound buffering structures have not been installed around machinery as specified in the resource consent, resulting in significant disturbance to nearby residents.
- The water catchment pond is believed to be leaking. Despite recent heavy rainfall, water levels have reportedly not reached outlet pipes, raising serious questions about whether leachate is already entering surrounding ground under existing operations.

These are not hypothetical risks. They are documented, reported failures at the current — far smaller — operation. The Council must weigh this demonstrated compliance record heavily when assessing whether a 10–20 year consent for an operation of dramatically greater scale and toxicity can responsibly be issued.

2.3 Misleading Representations to Neighbours

When neighbouring residents directly asked the operator whether there were any plans to expand beyond the initial small recycling operation, they were told categorically that there were no future expansion plans. It has since become clear that plans to scale the operation to the full 21-hectare Class 3 Managed Fill had been in development for a substantial period prior to that assurance. This pattern of non-disclosure is directly relevant to the weight the Council should give to the operator's commitments and adaptive management assurances in this application.

3. Airborne Contaminant Risk: Dust, Asbestos Fibres, and Human Health

3.1 Demonstrated Dust Harm Under Existing Operations

Local residents have experienced ongoing dust contamination from the current site operations. The dust observed is described as fine and reddish in colour, believed to be linked to sandblasting material brought onto the site from an external facility. The composition and contaminant content of this imported material is unknown to residents and has not been disclosed in the application.

The submitter holds significant photographic and video evidence of airborne dust events emanating from the site. These have been the subject of multiple formal complaints to the Waikato Regional Council. The AEE itself acknowledges that ResourceCo's existing consented activities have attracted complaints "mostly related to dust emissions and the alleged processing/disposal of asbestos."

3.2 The Step-Change in Contaminant Thresholds from Clean Fill to Class 3 Managed Fill

A review of the chemical thresholds in Table 3 of the application reveals a dramatic increase in permitted contaminant levels in the fill material. Given the physical operational context — 8,000 heavy commercial vehicle movements per year combined with a documented history of uncontrolled dust already breaking existing consent conditions — the mechanism for transporting these contaminants to residential properties is already established: airborne particulate dispersion and deposition.

- Lead: Clean Fill limit 78 mg/kg → Managed Fill 460 mg/kg (more than fivefold increase). Lead is a potent neurotoxin with no safe level of exposure. Inhaled particles pass directly into the bloodstream and readily cross the blood-brain barrier, causing irreversible neurological damage and cognitive decline. Children under three are most vulnerable.
- Arsenic: increases to 140 mg/kg. The AEE's own groundwater monitoring already records arsenic at MW2 exceeding DWSNZ Maximum Acceptable Values for human health under current operations.
- Cadmium: increases to 10 mg/kg. Cadmium is highly bioavailable to food plants. Leafy greens and root vegetables readily absorb it from dust-laden soil, creating a food-chain exposure pathway for residents with home gardens.
- Polycyclic Aromatic Hydrocarbons (PAHs as benzo[a]pyrene TEQ): from 2 mg/kg (Clean Fill) to 125 mg/kg (Managed Fill) — a more than 60-fold increase. Inhaled PAHs bind to human DNA and are strongly associated with lung, liver and skin cancer risk.
- Asbestos: permitted at up to <0.01% w/w (Asbestos Fines and Fibrous Asbestos). There is no safe level of asbestos fibre inhalation.

3.3 Flawed Air Quality Modelling: The Quarry Bowl Micro-Climate Problem

The Air Quality Assessment by Pattle Delamore Partners (PDP) applies standard meteorological modelling appropriate to open, flat terrain. This is scientifically inappropriate for the subject site, which is a deep, bowl-shaped former quarry:

- Wind entering a quarry void is deflected downward and recirculates, creating vortex patterns that trap dust within the bowl and periodically eject it upward and outward toward surrounding properties.
- Thermal inversions are more pronounced in quarry environments, holding fine particulate matter (PM10 and PM2.5) and asbestos fibres at low levels for extended periods rather than allowing vertical dispersal.
- The effective source height changes fundamentally through each fill stage — as the fill rises from the quarry floor to 21 metres above original ground level, dust plume behaviour changes in ways that static flat-terrain modelling does not capture.

The Council cannot rely upon the PDP assessment to conclude that effects on residential receptors will be less than minor.

3.4 Dust Engineering Realities: Why Suppression Will Fail

Controlling dust at a site processing 8,000 HCV movements per year presents extreme operational challenges the AEE underestimates:

- Dust generation is not confined to the tipping face. Every heavy commercial vehicle travelling to and from the site traverses the sealed access, but on-site tipping, spreading and compaction operations continuously expose and disturb dry fill material, generating fine PM10 and PM2.5 particulate fractions that become airborne regardless of road surface condition.
- The physical movement and compaction of fill by heavy machinery continuously exposes dry internal layers of contaminated material to wind shear.
- Standard water-cart dust suppression fails during dry summer months and high-wind events — precisely the conditions most likely to cause off-site dust migration to residential properties.
- Over-watering managed fill creates a secondary hazard: excess leachate carrying heavy metals and chemical contaminants into local groundwater — the very risk the application is supposed to prevent.

If the operator has historically failed to manage dust from a simple recycling plant under existing consent, it is not credible that it can reliably contain hazardous managed fill contaminants at 8,000 HCV movements per year.

3.5 Asbestos Fibres: An Unacceptable Public Health Risk

The Class 3 Managed Fill is proposed to accept trace asbestos-contaminated soils. Air monitoring for asbestos is proposed at monthly frequency during the first summer, reducing to quarterly thereafter. This monitoring regime is wholly inadequate for a site adjacent to residential dwellings. There is no safe level of asbestos fibre inhalation.

Quarterly boundary monitoring means a dust event transporting asbestos fibres to residential properties can occur, expose residents including children, and go undetected until the next monitoring cycle. The quarry micro-climate problem compounds this: fibres can be lofted from within the bowl and transported to neighbouring properties even when on-site staff do not observe a visible dust event.

Existing complaints specifically raised concerns that asbestos found on site may have arrived via incoming trucks rather than from the historic tip face — and that without consistent load inspection this cannot be accurately tracked. Granting a 20-year consent to accept vastly greater volumes of this material, with quarterly monitoring and this operator's compliance history, presents an unacceptable public health risk.

3.6 Roof-Harvested Drinking Water: A Direct Contaminant Pathway

Several residential properties in the area rely on rainwater tanks fed by roof catchments for household drinking water. This creates a direct, acute exposure pathway that the AEE does not assess:

- Heavy metals (lead, arsenic, cadmium) in airborne dust settle onto roofs and wash directly into water tanks during rainfall, bypassing any treatment. These metals are toxic at very low concentrations.
- Asbestos fibres that settle on roofs wash into tanks. Standard domestic filtration does not remove asbestos fibres.
- PFAS compounds (PFOS+PFHxS at up to 20 mg/kg; PFOA at up to 50 mg/kg) are persistent and mobile. Domestic UV and carbon filtration systems are completely ineffective at removing PFAS from water. Once in the tank, they pass directly to household taps.

The AEE contains no assessment of this exposure pathway and proposes no mitigation for households on roof-fed water supplies. This is a significant, unaddressed gap in the effects assessment.

4. PFAS: A Permanent and Irreversible Contamination Risk

4.1 The Scale of the Proposed PFAS Threshold

Table 3 of the application permits PFOA at up to 50 mg/kg = 50,000,000 parts per trillion (ppt) within the fill material. For context: the US Environmental Protection Agency has recently finalised legally enforceable Maximum Contaminant Levels for PFOA in drinking water at 4.0 ppt, with a health goal of zero because there is no known safe exposure level. The site proposes to accept material at concentrations up to 50 million ppt in an open-air, unsealed managed fill directly adjacent to residential properties, relying on dust suppression and a 2-metre cleanfill buffer. This is not a credible risk management framework.

4.2 Chronic Human Health Effects

PFAS compounds do not break down in the environment or in living tissue. They bioaccumulate with every exposure. Chronic health effects of long-term PFAS exposure include:

- Carcinogenicity: the US EPA and European Chemicals Agency classify PFOA as a human carcinogen, associated with kidney, testicular, breast and liver cancers.
- Immune suppression: chronic PFAS exposure suppresses antibody responses, increasing vulnerability to infectious disease and reducing vaccine efficacy.
- Endocrine and metabolic disruption: thyroid disease, elevated LDL cholesterol, and increased cardiovascular risk.
- Reproductive and developmental toxicity: PFAS cross the placental barrier and transfer via breast milk. Associated with pregnancy-induced hypertension, reduced fertility, developmental delays in children and elevated childhood obesity risk.

4.3 PFAS Bioaccumulation in Backyard Animals and Food

- Backyard chickens foraging on dust-covered ground concentrate PFAS in their organs and egg yolks, creating a toxic loop back into the human diet through eggs.
- Grazing livestock accumulate PFAS, leading to liver damage, reduced reproductive rates and lower milk production.
- Home vegetable gardens: leafy greens and root vegetables absorb cadmium and other heavy metals from dust-laden topsoil, creating a direct food-chain contamination pathway for residents growing their own produce.

5. Contamination of Water Sources

5.1 Confirmed Water Percolation Through the Quarry Void

The AEE's proposed 2-metre cleanfill buffer assumes the quarry is a contained basin. This assumption is directly contradicted by the applicant's own site manager, who confirmed at the 21 June 2026 neighbour meeting that "water often percolates from the southern bank of the site." No deep hydrogeological fracture mapping has been conducted to trace this confirmed percolation pathway.

The AEE also contains an internal inconsistency regarding the site's distance from the Waikato River — one section states 300 metres, another states 500 metres. At which distance were risk assessments modelled? This discrepancy has not been resolved and is directly material to the groundwater flow modelling underpinning the application.

5.2 Pre-Existing Water Contamination and the Leaking Pond

The AEE's own site investigation data shows the receiving water environment is already compromised: zinc exceeding ANZG Guideline Values downstream; arsenic at MW2 exceeding DWSNZ Maximum Acceptable Values; elevated chromium and copper at multiple monitoring wells; PFAS at MW2, MW3 and MW4; and electrical conductivity exceeding ANZG guidelines at all sampling sites.

The site's catchment pond is believed to be leaking — despite recent heavy rainfall, water levels have reportedly not reached outlet pipes, suggesting leachate may already be entering surrounding ground. Adding 1,472,200 m³ of Class 3 fill to this already-degraded, hydrologically uncharacterised environment creates unacceptable cumulative risk to local groundwater bores, the Drain and Stream, and ultimately the Waikato River — a nationally significant waterway and drinking water source for downstream communities.

5.3 Section 107 RMA

Section 107(1) of the RMA prevents the grant of a discharge permit where it is likely to result in significant adverse effects or render receiving waters unsuitable for their purpose. Given the confirmed percolation, the absence of fracture mapping, the already-degraded receiving environment, and the 10–20 year duration of the operation, the s.107 threshold cannot be satisfied. Consent must be refused on this ground.

6. Long-Term Land Use Sterilisation

Once a Class 3 Managed Fill site has accepted soils containing contaminants above clean fill limits, it becomes HAIL-listed under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES:CS). This means:

- Any subsequent subdivision requires resource consent as a restricted discretionary or discretionary activity — it cannot proceed as a permitted activity;
- Any change of land use to residential requires a Detailed Site Investigation showing compliance with Soil Contaminant Standards for residential land — substantially stricter than managed fill thresholds, making costly remediation likely necessary; and
- Future earthworks disturbing soil on the HAIL-listed site will also require resource consent.

Granting this consent is likely to permanently sterilise 21 hectares from the residential future the district plan envisages for this location. The applicant has made no binding commitment to fund remediation to residential standards upon closure. The Council must assess this long-term sterilisation as a significant adverse effect under s.104(1)(a) of the RMA.

7. Statutory and Planning Grounds

- Section 5 RMA: The proposal does not safeguard the life-supporting capacity of water, soil and air, and does not enable people and communities — including future residential neighbours — to provide for their health and wellbeing.
- Section 6(a) RMA: The preservation of natural character of waterways requires avoidance of contamination of the Drain, Stream and local aquifer.
- Section 7(c) RMA: The proposal fails to maintain and enhance amenity values for nearby residential occupiers over a 20-year period.
- Section 107 RMA: Consent cannot lawfully be granted given the confirmed percolation pathway and risk of rendering receiving waters unsuitable.
- Waikato Regional Plan Change 1 (PC1), finalised 8 June 2026: Long-term leachate discharge from a Class 3 fill into the Waikato catchment directly contradicts the

intergenerational water quality improvement objectives of PC1 and Te Ture Whaimana o Te Awa o Waikato.

- NES:CS 2011: The application does not adequately address HAIL implications for this site and adjacent land, given the Deferred Large Lot Residential zoning immediately adjacent.
- Waipa District Plan: The application must demonstrate compatibility with the residential future anticipated post-2035 in close proximity to the site.

8. Summary of Grounds for Opposition

15. Demonstrated dust harm from existing operations, supported by photographic and video evidence and multiple formal complaints.
16. Defective flat-terrain air quality modelling applied to a deep quarry landform — scientifically invalid.
17. Dramatic step-change in contaminant thresholds: lead 460 mg/kg, PAHs 125 mg/kg, PFAS 50 mg/kg, asbestos — all capable of airborne transport to residential properties, roof water tanks, gardens and animals.
18. PFAS accepted at 50,000,000 ppt against a US EPA drinking water safety level of 4 ppt. Domestic filters cannot remove PFAS. Roof-fed water tanks are a direct, unmitigated exposure pathway not assessed in the AEE.
19. Asbestos fibre risk adjacent to residential dwellings with only quarterly monitoring from an operator with a demonstrated non-compliance record.
20. Confirmed water percolation from the southern quarry bank (admitted by the applicant's own site manager). Deep fracture mapping not done. Section 107 RMA cannot be satisfied.
21. Receiving water environment already degraded from existing site activities. Catchment pond believed to be leaking.
22. Long-term HAIL-listing under NES:CS effectively precludes residential use of 21 hectares with no binding remediation commitment from the operator.
23. Nine documented categories of consent non-compliance under current operations, plus misleading representations to neighbours about expansion plans. Adaptive management assurances from this operator cannot be relied upon.

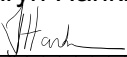
9. Evidence

The submitter intends to produce the following evidence at any hearing:

- Photographic and video evidence of dust events from the site during existing operations;
- Records of formal complaints to the Waikato Regional Council regarding dust, asbestos and operational non-compliance;
- Evidence from meeting minutes of the representations made by the operator to neighbours regarding the absence of expansion plans;
- The applicant's own confirmation of the site manager's verbal confirmation at the 21 June 2026 neighbour meeting of water percolation from the southern bank of the site.

SIGNED BY SUBMITTER

Name: Tamaryn Hankinson

Signature: 

Date: 24.06.2026

Contact:

⚠ IMPORTANT: A copy of this submission must be served on the applicant's agent as soon as reasonably practicable after filing with Waipā District Council:

Joe Gray, Saddleback Planning Ltd — (s.96(3) RMA)