

FORM 13 – SUBMISSION ON NOTIFIED RESOURCE CONSENT APPLICATION

Resource Management Act 1991

To: Waipā District Council
Private Bag 2402
Te Awamutu 3840

Submitter

Jarg Trustees Limited as trustee of the Jarg Trust



Resource Consent Application

Application: LU/0231/25
Applicant: ResourceCo Limited
Location: 3831 Cambridge Road, Cambridge

The Specific Application

This submission relates to all aspects of the application for the establishment and operation of a managed fill activity and associated land use activities at 3831 Cambridge Road, Cambridge.

Trade Competition

The submitter is not a trade competitor for the purposes of the Resource Management Act 1991.

Submission Position

The submitter **opposes the application as filed**.

The submitter seeks that the application be **declined**.

In the alternative, should consent be granted, the submitter seeks substantial redesign, reduced scale and significantly

The submitter wishes to be heard in support of this submission.

The submitter would be willing to participate in any appropriate expert conferencing, mitigation discussions or mediation process.

Reasons for Submission

1. Nature of Submitter Interest and Relationship to the Site

The submitter owns neighbouring rural land immediately adjoining the subject site.

The Trust property lies generally to the east of the proposed activity area, with the proposed managed fill activity predominantly occurring to the north west of the Trust property.

The Trust property is elevated relative to the proposed activity area and contains a tenanted dwelling used for rural residential purposes.

The access strip servicing the wider ResourceCo operations and proposed activity directly adjoins the northern boundary of the Trust property.

The Trust property currently benefits from established planting that assists in partially screening parts of the immediate outdoor living area associated with the dwelling. However, other parts of the property retain views toward the proposed activity area and operational landform changes.

Further, planting does not prevent dust, smoke, particulates, noise, odour or other effects from travelling beyond the site boundary and affecting the property, tenants and enjoyment of the land.

2. Rural Character and Planning Context

The site and surrounding area remain within the **Rural Zone**.

The Trust considers that neighbouring landowners and occupiers are entitled to maintain reasonable expectations of rural amenity, including quieter surroundings, reduced industrial activity, lower traffic intensity and a rural outlook.

The Trust is concerned that the cumulative scale, duration and intensity of the proposal are inconsistent with the intended character and amenity values of the surrounding Rural Zone environment.

3. Previous Consent History and Baseline Environment

The Trust notes that the wider site has progressively accumulated multiple industrial and commercial-scale activities through previous consent processes.

The Trust expressly records that it does not agree with the historical **non-notified consenting approach** adopted in relation to earlier activities on the wider site and is concerned that cumulative effects on neighbouring rural properties have been materially underestimated over time.

The Trust is particularly concerned that the current application appears to rely upon existing consented activities and the altered receiving environment created by those activities as part of its baseline analysis to justify further intensification.

The Trust does not accept that previous non-notified consents, or the cumulative effects arising from them, should automatically establish or normalise an industrial baseline within a Rural Zone environment.

The Trust considers that the proper planning framework remains the Rural Zone and the associated reasonable expectations of rural amenity held by neighbouring landowners and occupiers.

The Trust considers that cumulative effects of prior activities, together with the current proposal, require careful scrutiny and should not be used to dilute assessment of adverse effects associated with the present application.

For the avoidance of doubt, nothing in this submission should be interpreted as acceptance of previous consent processes or any reliance upon them for baseline purposes. The Trust expressly reserves all rights in relation to prior and current consent processes.

4. Cumulative Industrial Intensification (“Industrial Creep”)

The Trust is concerned that the proposal represents a further stage in the cumulative industrialisation of what remains a Rural Zone environment.

The site has progressively shifted from a rural environment toward increasingly industrial and commercial-scale activities including quarrying, recycling, composting, clean fill and now managed fill operations.

The Trust considers that the cumulative effect of these activities materially alters the surrounding environment and adversely affects neighbouring rural properties.

The proposal should not be assessed in isolation but rather in the context of cumulative effects over time.

5. Traffic and Accessway Effects

The Trust is particularly concerned regarding the effects of increased truck movements associated with the proposal.

The access strip servicing the wider ResourceCo operations directly adjoins the northern boundary of the Trust property.

Heavy vehicle movements already occur and are experienced by the Trust and tenants.

The Trust is concerned that additional truck traffic over a prolonged operational period will materially worsen existing effects, including:

- (a) noise from heavy vehicles;
- (b) reversing alarms and machinery noise;
- (c) dust and particulate generation;
- (d) vibration and disturbance;

(e) degradation of rural amenity.

The Trust considers that the traffic effects of the proposal have been understated and are much more than minor.

6. Existing Dust Effects and Intensification

Dust associated with existing truck movements and site activities is already experienced at times on the Trust property.

The Trust is concerned that the proposal materially intensifies an existing adverse effect.

The Trust notes that vegetation may partially assist with visual screening but does not prevent dust, smoke, fine particulates, diesel emissions or odour from affecting the dwelling, outdoor living areas and wider property.

The Trust is concerned that additional truck movements over many years will worsen existing conditions.

Dust and particulate matter travelling beyond legal boundaries constitute direct off-site effects adversely affecting neighbouring landowners and occupiers.

The Trust is concerned regarding impacts on tenants, outdoor living areas, vegetation, buildings, vehicles and enjoyment of the property.

7. Noise and Rural Amenity

The Trust is concerned regarding long-term noise effects associated with truck movements, machinery operation, reversing alarms and industrial activity.

The proposal is substantial in scale and duration and is likely to materially reduce rural amenity and quiet enjoyment.

The Trust is concerned that the proposal will adversely affect both the Trust property and its tenants over an extended period.

8. Visual Effects and Outlook

The Trust acknowledges that established planting assists in reducing direct visibility from parts of the immediate outdoor living area associated with the dwelling.

However, views toward the proposed activity area remain available from elsewhere on the property.

The Trust is concerned regarding the visual effects associated with substantial landform alteration, bunds, retaining structures, truck activity and industrial-style operations occurring within what remains a rural environment.

9. Duration and Scale of Effects

The Trust is concerned regarding the prolonged nature of the proposal and the cumulative impact of long-term industrial-scale activity over many years.

The duration of truck movements, earthworks and associated activity materially increases the significance of adverse effects on neighbouring landowners and occupiers.

10. Reverse Sensitivity and Compatibility of Land Use

The Trust is concerned that the proposal creates increasing incompatibility between industrial-scale activity and neighbouring rural residential use.

The Trust considers that the Rural Zone planning framework should continue to protect the amenity expectations of neighbouring rural landowners and occupiers.

11. Related Environmental Concerns

The Trust notes that separate regional resource consent applications address matters including contaminants, dust discharge, groundwater, stormwater, bunding, erosion and environmental risk.

The Trust remains concerned that unresolved technical and environmental issues reinforce concern regarding the appropriateness of the proposal from a land use and amenity perspective.

12. Reservation of Rights

The Trust notes that adverse effects associated with existing activities servicing the site, including dust migration and heavy vehicle movements, are already experienced to varying degrees on the Trust property.

Nothing in this submission should be interpreted as acceptance of existing effects or any future intensification of those effects.

The Trust expressly reserves all rights in relation to prior and present consent processes and any future off-site effects, including nuisance, particulate deposition, interference with quiet enjoyment, damage or other legal rights arising from activities associated with the site.

Relief Sought

The Trust seeks that the application be **declined**.

In the alternative, should consent be granted, the Trust seeks:

- (a) significantly reduced scale and duration;
- (b) strengthened setbacks and visual mitigation;
- (c) mandatory dust suppression and monitoring;

- (d) accessway management and traffic controls;
- (e) strengthened noise controls;
- (f) independent monitoring and compliance reporting;
- (g) enhanced landscape mitigation and screening;
- (h) conditions sufficient to protect neighbouring rural amenity.

Signed: Jarg Trustee Limited by its agent

Consultus Limited.

Pp

Date: 5 June 2026