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25 October 2024

Our Reference: RC-2024-0136

Enquiries to: Tony Ridge

von Ah Contracting Limited
Email: nicky@vonahcontracting.co.nz

Attention: Nicky von Ah

Dear Ms von Ah

RESOURCE CONSENT APPLICATION – RC-2024-0136 **Commercial Composting Operations – Kokatahi, Duck Creek Farm**

Pursuant to section 92(1) of the Resource Management Act 1991, the Council requests further information associated with the resource consent application to undertake composting at Kokatahi. The additional information is required for the Council to ascertain the environmental effects arising from the proposed composting activities and to assist in the determination of affected parties.

Pond management

The proposed pond dimension (within the application being 10 m x 35 m x 2 m) with the proposed pond freeboard of 0.769 to 1 m will result in 350 m³ manageable leachate volume. The worst case scenario rainfall input to the pads being estimated as 189 m³. Please provide daily irrigation volume estimated to be applied to land on a daily basis. From the information provided it is not clear of the amount of irrigable area available at any given time. Also provide an estimate of worst case scenario zero land irrigation days and pond capacity required with the proposed freeboard with a rainfall event resulting in continuous/sustained rainfall.

Odour emission management

Please provide a robust odour management plan with detailed odour indicator monitoring (e.g., compost moisture and pH levels) and response management. In particular provide comments to the following.

- a. Provide the specific management of more odour causing materials such as carcasses. How are the delivered carcasses being stored and managed. How is it composted in a manner avoiding nuisance odour emissions?
- b. Assessment of wind speed, direction and odour dispersion. It was identified the nearest neighbour is 300 m away from the site. With strong winds the odour could travel between 1-2 km. If so, how does the applicant propose to consider and consult with these affected parties.
- c. Provide confirmation of the compliance of the council's standard odour condition of no adverse effects outside of the boundary of the property.
- d. Is there a proposal to provide natural screening (hedge) around the property to avoid leachate spray drift (only if the spray drift is anticipated)

Composting pad management

Provide information on how rainfall is intercepted from the composting pad given that excessive moisture levels are not conducive to optimal compost management. Is the composting pad covered or protected from rainfall? Given the high intensity West Coast rainfall, optimum composting may not be possible as such a cover may be needed or any contingencies to manage optimal composting under open conditions.

- a. Is the pad lined? Although the answer is probably yes, in one section it was described as a compacted gravel pad and in another there is a diagram with plastic lining. Which of the information is correct?
- b. Is there a proposal to store and market compost leachate as a fertiliser? If so provide details. The reason for this additional information to assess how the leachate or any liquid fertiliser is being managed onsite.

Irrigation Management Plan

How much area is involved, as in one source it is 30 ha and in another application form it is 200 ha of total irrigable area with 34 ha available per day.

The proposed application rate given is 15 mm/h which could be more than the infiltration rate of the soil which could cause ponding/runoff. Please elaborate on the irrigation management plan detailed within the application including the soil moisture holding capacity of each receiving soil type.

What is the type of irrigation system (e.g., is it travelling or sprinkler?) used? Is spray drift from irrigation of leachate anticipated? If so, please provide details on any potential for pathogen spread and how spray drift is avoided, remedied or mitigated.

What is the proposed land use for the irrigable area. For example is it cut & carry pasture or livestock grazing?

If so, what is the annual loading and removal of the nutrients and the rationale in the context of nitrate leaching? There is reference to the use of Overseer model and if so where is the info?

If grazing involved as land use what is the type of livestock and what is the grace period proposed between grazing. How is leachate nutrient loading applied compatible with the grazing to minimise nitrate leaching?

Vector management

As the composting activities may attract flies etc., provide a comprehensive plan to avoid vector attraction.

Wetland construction

There is mention of the management of a constructed wetland. Are wetlands proposed as part of a leachate treatment system? If so provide details on rationale for the use of wetland, wetland dimensions and discharge and wetland maintenance management.

Truck effluent management

Please provide details of the truck effluent management, including the volume and disposal/discharge methods.

Monitoring Requirements

There have been no water bodies being affected by the proposed activities which need to be confirmed. There may be potential for groundwater quality to be affected. If so, provide any monitoring of the leachate hydrological and nutrient loading and groundwater monitoring programme should this be required.

Is there a proposal to monitor the land applied leachate quality? If so provide the rationale and monitoring programme. If cut & carry system is used please provide any monitoring programme on nutrient management.

Notes to this further information request

The Council will postpone making a processing decision on your application until we receive this information. Once we have received adequate information, a processing decision on the application will be made.

In accordance with section 92A(1) you must, within 15 working days of the date of this request, take one of the following options:

- a) Provide the information;
- b) Tell the Regional Council, in writing, that you will provide the information; or
- c) Tell the Regional Council, in writing, that you refuse to provide the information.

If you do not take one of these options within 15 days, the Regional Council may decline your application.

You can object to this request for further information by writing to Council, setting out the reasons for the objection, within 15 working days of receiving this request.

If you have any queries regarding this please contact Tony Ridge at the Council on 03 768 0466 ext. 8215.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tony Ridge', with a stylized flourish at the end.

Tony Ridge
Senior Consents Officer