

**SUBMISSION
ON AN APPLICATION FOR RESOURCE CONSENT
UNDER SECTION 96
OF THE RESOURCE MANAGEMENT ACT 1991**

Office Use Only



PART A: DESCRIPTION OF APPLICATION

CONSENT NUMBER:

RC-2024-0136

APPLICANT:

von Ah Contracting Limited

DESCRIPTION OF PROPOSED ACTIVITY:

Establishment and operation of a composting facility in Kokatahi

LOCATION:

1047 Kaniere-Kowhitirangi Road, Kokatahi RD1, Hokitika 7881

PART B: SUBMITTER DETAILS

Full name/s

AJ & TJ Family Trust

Postal address

[REDACTED]

I am the owner/occupier
(delete one) of the following
property:

[REDACTED]

Primary contact person/s

Adam Wyatt

Email address

[REDACTED]

Phone number/s

Home:

[REDACTED]

Business:

[REDACTED]

Mobile:

[REDACTED]

Fax:

[REDACTED]

Signature:

[REDACTED]

Date:

13/11/2025

Name (BLOCK CAPITALS):

Adam Wyatt Tineke Wyatt

*If this is a joint submission by 2 or more individuals, each individual's signature is required
A signature is not required if you make your submission by electronic means.*

I/we **support** the application numbers indicated by a tick on the back of this form

I/we **oppose** the application

I/we **neither support nor oppose** the application

(tick one)

☐
☒
☐

(tick one)

I/we **wish to be heard** in support of my/our submission.

☐

I/we **DO NOT wish to be heard** and hereby make my/our submission in writing only.

☒

If you wish to be heard, and others make a similar submission would you consider making a joint case with them at any hearing

☐

Yes

☐

No

If you indicated you wish to be heard, you will be sent a copy of the S.42A Officer's Report and a copy of the Decision once it is released. Please indicate below which format you would like to receive these documents in:

☐

Electronic (CD) copy

☐

Hard (paper) copy

I/we **have** served a copy of my/our submission on the Applicant as per Section 96(6)(b) of the RMA

☒

Yes

My/our submission is that: (state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific proposal, or wish to have amendments made, giving reasons)

Please see attached documentation

I/we seek the following decision from the Local Authority:(give precise details)

The application should be declined at this location

Important information – please read carefully

Public information

The information you provide is public information. It is used to help process a resource consent application and assess the impact of an activity on the environment and other people.

Your information is held and administered by the West Coast Regional Council in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. This means that your information may be disclosed to other people who request it in accordance with the terms of these Acts. It is therefore important you let us know if your form includes any information you consider should not be disclosed.



THE WEST COAST
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We oppose the Von Ah Limited's application to run a commercial composting operation in Kokatahi for the following reasons:

1. Too close to nearby residents

We believe the location is too close to nearby existing sensitive land users, including a school and accommodation provider within 400m, particularly due to the fact that the composting will all be done in open air. There are no examples in New Zealand that we can find that are successfully operating an open air composting business with no odour within the 900m that our own property is from the proposed site.

2. DAF Sludges and Paunch Grass classed as Level 4 highest odour risk feedstock

According to the Designing, Constructing and Operating Composting Facilities guidelines written by the Victoria State Government, which we believe is a guideline that New Zealand councils follow, daf sludges and paunch grass are both classed as Level 4 highest odour risk feedstock. This report states that Level 4 feedstock waste type should ONLY be used in an enclosed facility with secondary odour control because 'higher risk wastes require a higher level of engineered odour controls as process management alone is not sufficient to effectively minimise risk of odour impact'. So even though animal carcasses have been removed from this final application, we are concerned because the Von Ah proposal is for an open air system and will be using Level 4 waste which has the highest potential risk to human health and the environment. The Mote Odour Assessment report that the WCRC requested says that at the very least Level 4 feedstock should be receipted and contained in a bunker style storage system with constant negative pressure with the resulting gases passed through a biofilter treatment unit.

3. Duck Creek in close proximity

Duck Creek borders their property and our concern is that the leachate that will be irrigated across this land will enter into Duck Creek through the marked waterways, and in turn the Kokatahi River. Duck Creek is only 130 metres away from the proposed composting site and is known to often flood as it is a catchment for localised rainfall in the Kokatahi valley. When in flood it backs up onto the von Ah's and neighbouring properties across their low-lying paddocks.

We have just had two months of heavy consistent rain and the ground has been saturated this whole time. We are concerned that it will not be possible to contain the leachate to their property so it doesn't enter this nearby creek.

Duck Creek and Kokatahi River are both considered to be waterbodies of significance to Poutini Ngāi Tahu (West Coast Regional Council, n.d.). The values associated with the Kokatahi River are for mahinga kai (food or cultural material harvesting), navigation routes and traditional campsites. Duck Creek also holds important values to Ngāi Tahu for mahinga kai, and for kohanga which means it is an important waterbody for spawning areas for native fisheries and breeding area for birds. If these waterways are contaminated, then this will severely affect the water quality and have negative consequences on the aquatic life. This would be detrimental to the function of the river, for recreational activities and for mahinga kai.

4. Drinking Water Collection Contamination from Fly Ash

The von Ah Contracting Composting Proposal, in section 3.2.2.11, states the chemical components of the Karbon King fly ash that will be used in this compost. This ash contains toxic heavy metals including, but not limited to: mercury, lead and arsenic. These metals are well known to cause severe health issues, including cancer. The Mote Odour Assessment Report recommends that the Karbon King is not included in this composting proposal. However, there is already a huge pile of this substance currently on site that is clearly visible from Kaniere Kowhitirangi Road and Upper Kokatahi Road, including the school, and our property on Ford Road North. This existing pile seems to be a disproportionate amount of this material if it is to make up only 5% of the total composting material.

The residents of the Kokatahi small settlement zone and surrounding houses are situated in a corrosion zone (Zone C, medium risk) for wind-driven salt under the New Zealand building zones. We are concerned that because this proposed composting site is far closer, these heavy metals from the fly ash will very easily be transported this short distance and settle on the roofs of the surrounding houses. The majority of residents in Kokatahi collect their drinking water from rainfall on their roof as there is no reticulated water supply system in this area. Therefore, these heavy metals could easily contaminate this water supply and could lead to serious health issues.

5. Bringing industrial waste into the valley unnecessarily

The proposal identifies that the material to be used as part of composting operations will originate from offsite and is not an ancillary activity to any onsite agricultural or primary production activities. For these reasons, there is not a functional need for the proposal to take place at this location, let alone so close to existing, sensitive receiving environments and activities. There are many other sites around Hokitika that are already zoned industrial.

6. We have no assurances that additional feedstocks will be not added to the list at a later date

Feedstocks are not limited to what is listed as there is a statement under Proposed Conditions that states 'the applicant may apply to the WCRC to amend the volumes, or include a new feedstock, subject to the WCRC'. We are worried that animal carcasses and offal may be added at a later date, if the consent is granted.

7. Close proximity to local school

The local Kokatahi Kowhitirangi Primary School is only 400 metres away from the proposed activity site in direct line of sight with no protection from any trees directly in the path of the prevailing wind. A school is particularly vulnerable to unfavourable learning conditions and the potential odour could have a high detrimental risk to our young people. Our community relies heavily on having a local primary school to attract and retain farming families.

8. Out of date information

The application should include up to date information and photos of the proposed site in its current form. According to the application, figure 3, they are applying for a consent to build a compost pad on existing bare land. This compost pad has already been built as seen at an open day they held. There is also a large pile of feedstock already stored on this site before being consented. We find it hard to understand why this application does not seem current and that this consent is being applied for in retrospect but that point hasn't been specified anywhere. Our concerns are that this application has not been done correctly and will the composting operations be carried out in the same manner.

Conclusion

The location for this composting proposal is in the wrong place. It is too close to nearby sensitive land users particularly due to the fact that the composting will be all done in open air, especially using classified high risk feedstock. We understand the reasoning of von Ah Contracting Ltd's compost proposal to process this waste in a reusable way but we are concerned the location for this will significantly affect our quality of life including the potential to cause health issues, create odour, and contaminate drinking water, as well as the local waterways. This application should be declined for the above reasons and there is no specific reason why the compost processing needs to be in this particular location as the majority of industrial waste is being imported into the valley.



The stockpile of fly ash on site as seen from our property on Ford Road North shows that there is already feedstock on proposed site and the proposed site is not bare land as per photo supplied in their application.



The stockpile of fly ash on site as seen from the Kokatahi Kowhitirangi School on Upper Kokatahi Road above the constructed bund.