

File: RM24.143

9 April 2024

Via email to: rachael.eaton@boffamiskell.co.nz and chris.henderson@dcc.govt.nz

Dear Rachael and Chris,

Request for further information under section 92(1) of the Resource Management Act 1991 (the Act) – Consent Application Number RM24.143

Thank you for your application to undertake various activities for the purpose of operating a Resource Recovery Park Precinct.

An initial assessment of your application has been made by Shay McDonald, SLR consulting and Jacobs Consulting who are providing a technical audit of the application. To be able to make a full assessment of the application, I request the following information under section 92(1) of the Resource Management Act (the Act).

Natural Character matters

1. Please include ‘scenic quality’ and ‘habitat provision’ (regarding natural character values) among quoted policy context matters (Section 3 Relevant Statutory Provisions) and provide direct comments in response to these.
2. Please clarify statements at p. 42:
‘Natural character of the adjacent waterways and nearby Kaikorai Estuary is higher, particularly in regard to the birdlife that the estuary supports and scenic qualities present. Those same scenic qualities are less apparent in the waterways immediately adjacent to the RRPP Site’.

While this appears to relate to relevant policy matters, findings are somewhat immediately arrived at (without direct reference to context analysis, and either context photographs or other studies) and it is unclear if these are the author’s own findings or if these findings draw on other expertise, such as ecology, or wider landscape studies.

This information is required to better understand how the proposal aligns or does not align with relevant planning documents.

3. Please provide the earlier requested plan illustrating an overlay of the existing with the proposed site footprint.

4. Please provide a closer scale cross section between the site (proposed development area) and the adjacent Kaikorai Stream which crosses through the proposed glass bunker location (this is currently shown partially obscured behind vegetation). The cross section provided (Figure 6A, p.15 GS) appears to illustrate continuous trees from the top of the embankment down to the stream, which is inconsistent with the access track being located below the embankment.

This information is required to better understand the nature and layout of the site.

Air Quality matters

5. EnviroNZ odour monitoring procedure “ENV-50-025 Odour and Litter Monitoring Work Instruction”
 - a. Please provide details on how the time for monitoring is decided.
 - b. Note (4) refers to “offsite monitoring downwind of the source” – please confirm if this a separate work instruction, or a repeat of the same assessment further downwind.
 - c. Note (5) refers to interpretation of the odour findings but only refers to the Odour Intensity observations. Please provide clarification on how the extent observation factors into note (5)?
 - d. Please confirm whether the interpretation in Note (5) is based on just the initial impression of the odour as per note 2(d), or if there is a requirement proposed for observation of the odour over a period of minutes.

This information is required to better understand the proposed monitoring should consent be granted.

6. Operating hours

Please confirm whether it would be practicable to have a restriction on operating hours for certain activities with higher potential for odour, in particular bunker-to-bunker transfers, bunker unloading, and compost screening. For example, to require those activities only to be conducted between 10am and 4pm. The purpose of this request is to exclude meteorological conditions in the morning and late afternoon when the rate of dispersion may be poor.

This information is required to understand potential impacts of odour from the application.

7. Operation of the ORB
 - a. Please clarify why the ORB doors need to be open when the shredder is loading?
 - b. Please confirm whether loading of the shredder occur at the same time as the shredder is running, or beforehand?

This information is required to better understand the nature of the activity.

8. Odour control measures in the Organics Processing Facility Management Plan (Section 6.2)
 - a. Comment that “The emptying of a bunker for transfer to the curing area will not be started if the prevailing wind is blowing towards an immediate receptor” – this is quite vague. Please explain how this will work in practice including specifics of the Green Island receiving environment.

- b. Comment that “If the operation has been started and wind increases, the job will be finished as speedily as possible” – this is appropriate for dust, but not for odour. Please clarify what “wind increases” means.

This information is required to better understand potential effects on odour as a result of the proposed activity.

9. Air flow rates

Response to pre-application questions provided in spreadsheet states peak air flow rate of 14-15 m³/h per bunker. However, the Compost Handbook (2022) recommends a peak airflow rate of 6.5-22 m³/h per cubic metre of pile volume for ASP composting. Given that the volume of composting material in each bunker is likely to be 300m³ (based on a footprint of 140m² per bunker), the stated peak air flow rate of 14-15 m³/h per bunker seems very low. Therefore, please confirm the design air flow rates.

10. Bunker-to-bunker transfers

- a. Please provide detail on how the aeration system operates (positive or negative) during bunker-to-bunker transfer on both bunkers?
- b. Please confirm how long it will take to complete a transfer?

This information is required to better understand the nature of the activity.

11. Operational experience of running bunkers in positive and negative ventilation mode

- a. Please provide detail on the operational experience at Hampton Downs with ASP running under negative ventilation? Please confirm whether they reliably operate under negative air flow, or do the holes block up and require positive air flow?
- b. Provide operational data from Hampton Downs over a period of at least 12-months operation detailing the percentage of time during the bunker aeration phase where positive aeration is required.

This information is required to better understand potential air quality effects that are likely to occur at this site based on other sites relied upon in this assessment.

12. Meteorological data

- a. Now that two full years of meteorological data are available, please provide an addendum that covers two full years of meteorological data and confirm if any changes to the frequency analysis in the odour assessment arise from this.
- b. Please also provide the two full years of meteorological data as a digital data file.

This information is required to understand the nature of the receiving environment.

13. Biofilter (some of these are repeat of the Pre-Application questions, where these do not appear to be addressed in the application)

- a. Please provide detail on where the biofilter will be located? A map showing this location would be beneficial.

Please confirm the following:

- b. The proposed dimensions of the biofilter, including length, width, and media depth?
- c. What the maximum and average airflow loading expected to the biofilter?
- d. What is the proposed minimum empty bed residence time for the biofilter?



- e. That the biofilter will be designed with redundancy for offline maintenance? For example, how will media replacement be managed so that odour control is not compromised while the replacement operations are carried out.
- f. The expected maximum incoming air temperature to the biofilter and how will this be managed? Please provide monitoring data from Hampton Downs to support answer.
- g. Please describe how the biofilter design and monitoring will avoid situations such as that seen at Hampton Downs at the site visit where the biofilter was out of action because of a corroded inlet pipe:

This information is required to better understand the proposed use of the biofilter on the site and the potential effects that may arise from its use.

Your application will be placed on hold under section 88C of the Act until the requested information has been received. Unless I hear otherwise from you I will continue to do some minor work on your application so that we can progress it once the application comes 'off hold'.

In accordance with section 92A of the Act, please respond within 15 working days from the date of this letter (**1 May 2024**) with one of the following:

1. The information requested above; or
2. Written advice that you agree to provide the information, and the date by which you intend to provide it; or
3. Written advice that you refuse to provide the requested information.

The Act requires Council to publicly notify your application if you do not provide the requested information before the due date (or an agreed alternative date), or if you refuse to provide the information. It is, therefore, important that you contact us promptly to discuss an alternative timeframe if you are unable to provide the information by the due date.

If the information you provide raises more questions, your application will remain on hold until sufficient information has been provided to enable processing to continue.

If you have any further queries, please contact me on (03) 474 0827 or 0800 474 082.

Information on the current processing costs for your application is included in the email relating to this letter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rebecca Jackson', written in a cursive style.

Rebecca Jackson
Team Leader Consents
9 April 2024