

13 September 2023

Babbage Consultants Limited
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AUCKLAND 1140

Dear Sukhi

**APPLICATION FOR RESOURCE CONSENT RM220066
SOUTH ISLAND RESOURCE RECOVERY LIMITED**

REQUEST FOR FURTHER INFORMATION

Thank you again for your application for resource consent for the waste to energy plant. Whilst the application remained on hold under Section 91 of the Resource Management Act, and prior to the call-in of the applications, we continued to review the application to Waimate District, with a view to identifying any further information requirements. This letter sets out further information that we consider is required to fully understand the proposal and the actual and potential environmental effects.

We note that following the Ministers decision to call-in your proposal under s142 RMA, the Environmental Protection Authority (EPA) is now administering the process and therefore the applications will follow a different pathway, meaning the EPA or the Environment Court may request further information independently. However, we understand that Environment Canterbury has spoken to Jillian Kennemore of the EPA and been informed that all parties see value in receiving these further information questions, as they will enable a better understanding on matters that are missing from the application and/or need further clarification. We have proceeded on that basis. Please note this also means this request for further information is no longer a formal s92 letter and therefore not subject to the s92 timeframes for a response. However, we are hopeful that the set of questions our experts have asked for clarification on, will be answered as they will be needed to inform the Key Issues report which we will need to provide to the EPA pursuant to s149G RMA.

The further information requirements we have identified are as follows.

1. Site and Building Plans

- a. The plans provided do not clearly illustrate the proposed site layout, including the proposed car park, although the car parking dimensions are described in the Transport Assessment. Please provide a scaled site plan, showing a site layout that includes a dimensioned plan of the proposed car parking arrangement to assist in understanding the proposed arrangements.
- b. Please provide scaled elevation plans for proposed buildings, to assist with understanding what is proposed.

2. Transport

- c. The Transport Assessment notes there will be gates provided at the Heavy Vehicle access. Although there is discussion of queue space provision at the Light Vehicle access, there is no discussion of gates. Please confirm whether or not gates are proposed at the Light Vehicle access and, if gates are proposed, provide commentary regarding queue space provision.

3. Noise

- d. Section 5.2.1 of the Acoustic Assessment by SLR notes an assumed 12 trucks accessing the unloading platform per hour. Section 5.2.4 of the same report anticipates a peak hour heavy vehicle movement of 6 vehicles per hour to and from the site. Please explain the apparent contradiction between these vehicle generation estimates.

4. Visual Impacts/Landscape

- e. Please confirm if 4470 Waimate Highway, as referenced on pages 22 and 23 of the Landscape Assessment Report by Brown NZ Ltd, should read 4700 as per the photograph on page 23.
- f. Please provide a map that shows all private residences within a 3km radius of the application site. On this map, please label all residences that have been specifically assessed in the Landscape report. This will assist to clarify whether or not all relevant residences have been assessed. For example, 48/50 Andrews Road (distance around 1.4km) does not appear to have been addressed, though they would most likely gain direct views towards the proposal that are similar to higher compared to those experienced at 190/197 Mairos Road, that have been addressed in detail. Similarly, 77 Mairos Road (less than 1km from the proposal) does not appear to have been assessed. We would recommend that an assessment of visual effects on 48/50 Andrews Road and 77 Mairos Road be undertaken.
- g. We note the proposal to use Kahikatea as part of the landscape mitigation plantings. We are aware that Kahikatea prefer a wet habitat and the mitigation plan shows wetland underplanting on the northern side of the site. Please advise how wet the site is and how well the Kahikatea are likely to thrive on the southern side of the site. Related to that question, it would be helpful to understand the expected growth rates of the Kahikatea in the particular site conditions.
- h. Please explain to what extent does the landscape and visual effect rating in the Landscape Assessment report rely on screening located on other private properties outside the application site? This includes intervening shelterbelts and amenity planting around residential dwellings. While residents may choose to retain existing screening around their dwelling, rather than opening up views towards the proposal if they perceive the effects as adverse, there is a reasonable chance for shelterbelts to be removed in this environment (e.g. for pivot irrigators). Could the assessment make clear where the effects rating would substantially change should this be the case.

5. Economic

- i. The application indicates that waste will be diverted from three South Island landfills (Green Island, Kate Valley, Victoria Flats). Please clarify what districts currently direct waste to those landfills. The purpose of this question is to understand the true catchment from which waste is being sourced.

- j. Please provide further information on what economic effects are anticipated in the waste management sectors of districts where waste will be sourced. Consider for example, how diverting waste from the three landfills (and their catchments) will impact on waste management employment and the economic viability of businesses currently involved in waste management in those locations.
- k. Please provide further information on what impact redirecting MSW from local landfills to the facility might have on waste management charges for rate payers in impacted districts. In other words, who will bear the cost of transferring a portion of waste further (in most instances)? How will the charges per tonne of waste differ at the facility from current landfill charges?
- l. In the Life Cycle Assessment report by SLR – Table 7 and 10 – Does the referenced transport distance represent a one way or return travel distance? Does the modelling account for return trip distance for all trucks movements?
- m. In the Life Cycle Assessment report – scenario 4 assumes 50% of MSW from Central Otago is transported by train and 50% by road. Please comment on this assumption (and any implications for results) given the absence of current rail connections to Central Otago. Does “SIRRL’s preference to maximise rail movement” (page 37 of the Life Cycle Assessment report) subject to “technical and financial viability assessments” extend to potentially providing a rail link to Central Otago?

6. National Policy Statement on Highly Productive Land

- n. A site-specific soil survey was undertaken of the site to determine the Land Use Capability class of the soils. In a 14.85 ha site the minimum number of soil observations required would be 25 but if soils are difficult to predict or have complex patterns up to 36 observations. Only 6 observations have been undertaken on the site, in an alluvial landscape. As unpredictable soil patterns occur in alluvial landscapes, more observations are warranted on the site.
- o. Guidance on soil classification requires more detailed mapping to be in the form of S-map. S-map has been consulted by the applicant’s experts. Site-specific soil observations should have been classified using Hewitt (2010) and Webb and Lilburne (2011) i.e. taxonomically identified, with designated soil horizon and functional horizon nomenclature provided, and a correlation provided where possible with S-map soil siblings. This information has not been provided and we request that it is provided. This information would ensure that information about vulnerability for leaching, runoff and Available Water Capacity is supplied, which augments the information about versatility and productive capacity provided by the LUC Survey Handbook once the LUC Class is assigned.
- p. More information needs to be provided about the linkage between the characteristics of soil and land at the site and the versatility and therefore the

productive capacity of the LUC map units on the site. This needs to refer to specific subsections of the LUC Survey Handbook (2009).

- q. Note, in respect of questions (n) to (p), it is important this information is provided by a qualified pedologist with experience in surveying and classifying NZ soils according to S-map and the NZ Soil Classification (Hewitt, 2010).

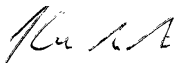
7. Cultural Impact Assessment

- r. We acknowledge that you have provided an assessment of the cultural effects with the application. However, we have sought feedback from the local Rūnanga and their representatives and the consensus is your assessment is inadequate as it does not address some of the site-specific cultural effects. It is our view that a more comprehensive site-specific CIA prepared by a suitably qualified person on behalf of or at least in consultation with the Rūnanga that holds manawhenua in the area of the proposed development, will be required by the Environment Court and therefore we recommend this be completed.

Queries

If you have any queries in relation to this letter, please contact me on 03 365 5570, or kim@novogroup.co.nz.

Yours sincerely



Kim Seaton
Consultant Planner