

Job Ref: 17013

28 June 2019

Hastings District Council
Private Bag 9002
Hastings 4156

Attn: Janeen Kydd-Smith c/- Murray Arnold

RMA20180414 | 174-176 BROOKVALE ROAD, HASTING | RESPONSE TO FURTHER INFORMATION

The following is our response to the matters raised in the letter dated 7 June 2019 seeking further information.

1. Council received a submission on the notified application from Hastings District Council's 3 Waters Manager (Mr Brett Chapman) ("the Submitter"), which states that the AEE provided with the application does not consider effects of the proposed activity on the public drinking water supply located in Brookvale Road. The submission requests that the applicant considers how the proposal may impact the public water supply and that the applicant engage with the water supplier on their proposal and any controls they propose to mitigate risk to the groundwater that is the source for the Brookvale water supply.

The National Environmental Standard for Sources of Human Drinking Water (NES) is a regulation made under the Resource Management Act (1991) that sets requirements for protecting sources of human drinking water from becoming contaminated

Please provide information on the potential risk of the proposed activity, including the associated composting operation (leachate and wastewater treatment system), having a significant adverse effect on the quality of the water at the abstraction point for the public water supply at Brookvale Road. Please also advise whether the applicant has consulted with the Submitter on this matter, and if so, what the outcome of that consultation was.

We have discussed the concern raised with the submitter. Key points include:

- The National Environmental Standard for Sources of Human Drinking Water (NES) applies to water and discharge permits – not landuse consents,
- The water and discharge permits associated with the operation include the discharge of stormwater into water (DP140244W), the discharge of domestic effluent into land (DP140245L) and the discharge of wastewater (derived from the composting pad) onto land (DP100129La),
- The NES was considered in the assessment of, and the granting of these resource consents,
- From a strict interpretation perspective, the matter of the NES is considered to have been addressed by these existing resource consents,
- The submitter however seeks consideration of the management of associated/operational activities, that although not subject to a resource consent, may



pose a threat to the drinking water supply such as unexpected spills etc. The following conditions are proposed in order to provide the relief sought by the submitter:

contaminants associated with the consent holder's operations escape onto land or into water other than in conformity with a Resource Consent,

- x. The consent holder shall engage a suitably qualified and experienced person to prepare a Site Management Plan (SMP) for the purposes of reducing or avoiding the potential for contaminants, other than in conformity with a Resource Consent, to be accidentally released onto land or into water. The SMP shall include, but not be limited to:
 - a. A description of the activities on the site (including use and storage of hazardous substances).
 - b. Identification of contaminants likely to be generated from the site, with reference to the "Source Control and Housekeeping" (Part 2) guidelines of the "Hawke's Bay Waterway Guidelines"; *Industrial Stormwater Design*, (May 2009), or updated version.
 - c. Comment on the adequacy of the site procedures and methods of avoiding contaminant release onto land or into water and make recommendations for improvements that will reduce the risk of contaminant discharge.
 - d. Recommendations for site management improvements to reduce or avoid the potential for contaminants to be released, and timeframes by which these improvements shall be undertaken.
 - e. Consideration of the need to seal and/or cover high risk parts of the site to reduce the risk of contaminant release and recommendations in this regard.
 - f. A spill management plan that includes procedures for preventing contaminants entering any waterbody in the event of a spill and that includes details of where chemical spill kits will be kept on site.

Advice Note: The Council's *Hawke's Bay Waterway Guidelines: Industrial Stormwater Design* (HBRC Plan Number 4107) can be used to assist in identifying for specified land uses the types of contaminants likely to be generated, the risk of discharge, and appropriate treatment methods for these land uses.

- x. A copy of the SMP shall be provided to the Council within 24 months of the consent being issued and shall be implemented and adhered to.
- x. The SMP shall be reviewed and updated on a two-yearly basis or and after any material changes of activity on the site. When updates to the SMP are made, a copy of the updated plan shall be provided to the Council within 1 month of changes being completed.
- x. Chemical spill kits suitable for the types of materials held on the site shall be kept on the site at all times and shall be regularly inspected and maintained to ensure that they are available for use at all times. The spill kits shall be readily accessible in the event of a chemical spill, and staff shall be trained in spill response procedures, including the use of the spill kits.
- x. That where, for any cause (accidental or otherwise), contaminants associated with the consent holder's operations escape onto land or into water other than in conformity with a Resource Consent, the consent holder shall:
 - a) Immediately notify the Council of the escape, and;
 - b) Take all practicable steps to contain the discharge and to subsequently remediate any adverse effects on the environment; and,
 - c) Report to the Council, in writing and within 7 days, describing the manner and cause of the escape and steps taken to control it and prevent its reoccurrence.
- x. The consent holder shall notify the Council as soon as reasonably practicable if any event occurs that may have a significant adverse effect on the quality of water at the Brookvale Road Public Water Supply bores.



The 24 month period to prepare and provide the SMP to the Council has been developed taking into account the array of micro projects proposed in relation to odour that will be undertaken over a short duration of only 3 years. Time is required to co-ordinate a range of projects.

2. *Please advise whether the increase in production will require additional storage of spent/used compost. If so, please advise where and how the additional spent compost will be stored and covered on the site and how any leachate from this storage area will be contained and managed to avoid adverse effects on groundwater or stormwater runoff. Please also advise what work (if any) has been done on the existing storage area over the past two years.*

Increased production will produce additional spent compost. The application proposed that spent compost will be stored within either of the following areas:

1. On a concrete pad in the existing spent compost area located at the front of the site under a canopy to keep the spent compost dry – any remaining compost will be removed from the site within 7 days,
2. On a concrete pad in the centre of the site - any remaining compost will be removed from the site within 7 days.

It is now proposed that the spent compost will either:

1. Be stored on a 'now covered' concrete pad in the centre of the site – with any remaining compost being removed from the site within 7 days, or,
2. Removed from the site directly from the growing rooms.

In terms of option (1), the concrete pad will be covered so as to prevent the generation of any leachate produced by rainfall. We are advised that the spent compost is a dry substance and that it does not in itself produce leachate. In the event that option 1 is adopted, the covered structure will be constructed within 8 months of granted consent.

3. *The response to the further information request (dated 5 February 2019) advised that the volume of earthworks associated with constructing the oxidation pond was approximately 500m³ and the depth of the excavation was approximately 3m. By our estimate, it appears that the length of the pond is approximately 39m and the width is approximately 14.5m. If that is correct, we anticipate that the volume of earthworks to construct the pond would have been approximately 1,696m³. Please advise how the 500m³ volume of earthworks was calculated.*

A volume of 1,696m³ comes about by assuming a uniform rectangular pond i.e. 39m long x 14.5m wide x 3m deep = 1,696m³. With batters along each side however, the shape of the pond is not a uniform rectangle and the volume of earthworks is subsequently much less.

We have since been provided with a pond calculator prepared for the installation of the liner (refer **Attachment 1**). This indicates an excavation depth of 5m and an excavation volume of 1,225m³. We are advised however that the actual excavation was much less – at approximately 3m deep, with a 0.5m high bund formed above the surface to provide an overall vertical extent of 3.5m deep within which the pond was formed. Although exact calculations are not available, the volume of earthworks to construct the pond is expected to have been in the order of 650m³-1,000m³.



4. *The response to the further information request (dated 5 February 2019) confirmed that the pump shed and some of the oxidation pond infrastructure (not the actual pond) are constructed across the boundary of the site onto the neighbouring property (i.e. Lot 1 DP 16136). Please advise what action is proposed to remediate this situation (e.g. is it proposed to move the shed and infrastructure so they are fully located within the applicant's site, obtain easements over the neighbouring site, or undertake a boundary adjustment with the neighbouring site so that the boundary is extended to fully include the shed and infrastructure within the applicant's site)?*

It is proposed to remediate the situation by either moving the shed and infrastructure so they are fully located within the applicant's site, albeit with no yard setback, or undertaking a boundary adjustment. This will be undertaken within 24 months of granting consent. Again, this timeframe has been developed taking into account the array of micro projects proposed in relation to odour that will be undertaken over a short duration of only 3 years. Time is required to co-ordinate a range of projects.

We trust the information provided is sufficient to satisfy the information request. Please do not hesitate to contact us if we can be of any further assistance.

Your Sincerely

Cameron Drury BRP(HONS) MNZPI

Principal Planner | Director

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Attachment 1

Pond Calculator

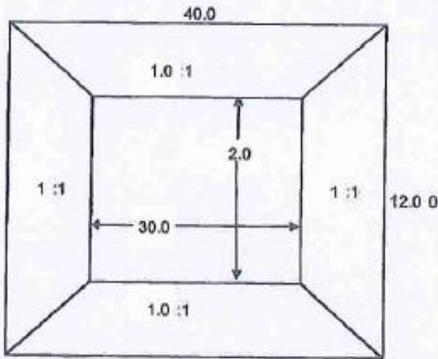


POND CALCULATOR

SITE
CLIENT
CONTRACTOR
CONSULTANT

JOB NUMBER 912166

Te Mata Mushrooms LOCATION _____



Freeboard depth 0.50 m
 Depth of Water 4.50 m
 Depth (bottom) 5.00 m

Berm Slopes 7.07
 water Slopes _____

Water Volume = **1009 m3**

Area of Top (A_t) 480.0 m2

Area of Bottom (A_b) 60.0 m2

Area of sides : (A_s) 593.9 m2

Liner inside berms 654 m2.

+ Anchor length 2.2 883 m2

+ wastage 10 % 948 m2

Calculations:

$A_t = 40.0 \times 12.0 = 480.0$

$A_b = 30.0 \times 2.0 = 60.0$

$A_m = 35.0 \times 7.0 = 245.0$

$A_w = 39.0 \times 11.0 = 429.0$

$A_{mw} = 34.5 \times 6.5 = 224.3 \times 3 = 673 m^2$

LINER (m²) 1000.0

GEOTEXTILE (m2) 900

WAVIN BANDE (m) _____

VENTS _____

LADDERS (m) 2 x 6

PIPEBOOTS (mm) _____

GCL (m2) _____

POLYLOCK _____

Depth of Excavation (D) = 5.00
 Excavated Volume = _____ = 1225 m3

DESIGNER Sarah/Chris DATE 20/03/2013