

27 January 2023

Rangitikei District Council
C/- WSP New Zealand Limited
PO Box 1472
Terrace End
Palmerston North 4441

Via email: Tabitha Manderson (tabitha.manderson@wsp.com)

Dear Tabitha,

Additional Information Request for Application APP-2022203996.00

Thank you for your resource consent application for the Rātana WWTP Discharge Works. The application has been assessed and we have determined that in order to fully assess the effects of your proposal additional information is required.

The additional information is listed below and is requested under section 92(1) of the Resource Management Act:

Erosion and Sediment Control Matters

1. The application notes that earthworks are required for the purpose of a storage pond construction and ancillary earthworks. There appears to be no details of the specific earthwork activities, earthwork areas and volumes. Please confirm this detail.
2. The application states that an ESCP will be provided prior to works commencing. To enable an assessment of the ESC approach and the effects of earthworks as part of this consent some details will be required at the application stage. Please provide an ESCP that outlines the general approach to earthworks and confirms an ESCP approach. This can be in the form of a draft ESCP that confirms an approach with associated ESC measures however retains flexibility such that the contractor can amend prior to construction if required. The ESCP needs to be consistent with relevant ESC guidelines.

Air

3. Please provide more information on the nature and extent of odour issues/events associated with the WWTP, in particular, the details of any odour complaints, how they were resolved and will be avoided in future

Groundwater

4. Please provide further information on bacterial reductions with distance from the site. This information should use a quantitative estimate based on likely reductions within the saturated zone only given that groundwater levels are very shallow at the site.

Ecology

5. During the site visit, the extent of wetlands appeared to be more extensive than what was indicated in the ecological assessment of the application. Based on the coverage of the wetland plant species present and the indicators of wetland hydrology, Ms Cook's preliminary assessment within the wet areas gave the impression that further natural wetland might be present. Vegetation plots or hydrology tests as per the NPS-FM protocols for delineating natural wetlands were not carried out by Ms Cook during the site visit. Please consider the image (attached at the end of this letter) of the potential wetland areas noted last week against the wetland map in the ecological assessment of the application. Please advise if these or any other additional wet areas checked under the NPS-FM wetland protocol? If the additional areas as identified on the image below were not assessed or tested against the NPS-FM protocols, please complete and provide these assessments.
6. Please provide an assessment of the requirements of the National Environmental Standards – Freshwater (2020) against the proposed discharge of wastewater to the identified Wetlands and the other areas noted by Ms Cook above.
7. Please provide an assessment of the requirements of the National Environmental Standards – Freshwater (2020) against the proposed discharge wastewater to (standing) water.

Land

8. Please provide a plan showing the land area comprising poorly drained soils versus free-draining soils at this site. Please include the sizes (ha) of these areas on the plan.
9. Please provide the soil hydraulic properties for both the poorly-drained and free-draining soils (including infiltration rate, unsaturated hydraulic conductivity and water holding capacity).
10. Please provide the soil chemical properties (soil testing) of the poorly drained and freely drained soils, in particular retention properties such as cation and anion exchange capacities.

The soil testing locations and reps should consist of the following:

- a. Chemical – three (3) composite samples collected across the low-lying areas, and three (3) composite samples collected across the irrigated dunes.
 - b. Physical – three (3) locations for each soil type, with 3-4 reps per location.
11. Please explain how the hydraulic loading rates have been estimated using the soil water balance approach, including proportion of land that is poorly draining and free-draining, confirmation that this has been calculated at a daily time-step, volume (or depth in mm) of surplus water (i.e., drainage) in non-deficit scenarios.
 12. During the site visit we discussed the possibility of standing water forming in the low-lying areas, and potentially that irrigation would continue regardless of standing water/ponding. Please elaborate further on these comments and, should this be the intended approach, provide greater specificity regarding when this would occur and what the 'triggers' may be.

13. Please provide evidence to support the assumptions made regarding Nitrogen leaching and Phosphorus run-off (Overseer files). Please ensure that the Overseer modelling is based on the soil types present at Rātana and consider the specific wastewater characteristics (current) and crop/pasture types (proposed), as well as the hydraulic loading for the site (current and future).
14. Please provide greater specificity regarding the irrigation hardware to be used at the site and if different hardware is proposed depending on where the wastewater is being discharged.

Existing site

15. Please provide an assessment of existing compliance of the discharge to the Stream currently occurring from the WWTP.
16. Please detail if any infrastructure changes will occur at the WWTP to improve the water quality that will continue to discharge to water until the land based discharge is operational.
17. Please detail if any infrastructure changes will occur at the WWTP to improve the water quality that will be discharged to land.

General matters

18. Access to the 3-D imagery was very helpful. Is it possible for the site boundaries and different management zones to be imposed on this image and the 3-D imagery re-provided?

Consultation

19. We discussed on site, and I reiterate here, that there is an absence of direct comment or s95 written approvals from the immediate neighbours to the site. Please elaborate on the consultation that has occurred with these neighbours. Specifically, I am referring to the following parties:
 - a. Damian and Jessica Sollitt,
 - b. Rob and Sarah Craig,
 - c. Otairi Station Ltd, and
 - d. Owners of the PT RAKAUTAUA 9 BLOCK (leasee is Bruce Craig)

Under the Resource Management Act, you must, within 15 working days of the date of this letter, take one of the following options:

- a. provide the information; -OR-
- b. advise in writing that you agree to provide the information (at which point we would negotiate a reasonable time within which the information will be provided); -OR-
- c. advise in writing that you refuse to provide the information.

The time taken to respond to this request and provide the information will be excluded from the processing of your application as per section 88C of the Resource Management Act.

Please be aware that should you decide to refuse to provide the information or fail to respond within the agreed timeframe, we are required (under section 95C of the Resource Management Act) to publicly notify your application and to continue

processing your application based on the information provided. Public notification can add significant costs and an additional lodgement fee would be required at that point.

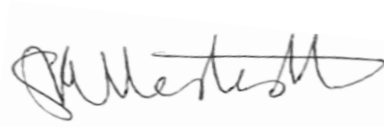
If you have any questions in regards to the determination or wish to discuss any aspects of this letter, please contact our office on 0508 800 800.

Yours sincerely,

APPROVED by,



Fiona Morton
CONSULTANT SENIOR CONSENTS PLANNER
HORIZONS REGIONAL COUNCIL



Sara Westcott
TEAM LEADER CONSENTS
HORIZONS REGIONAL COUNCIL

Copy to: Damien Wood (Damien.Wood@rangitikei.govt.nz)



Ratana RDC wastewater site, Jan 2023

Date: 26/01/2023.
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