

Cavalier woolscourers
11 Waitangi Road
NAPIER

Attention: Tony Cunningham

23 December 2014

Dear Tony

Consenting durations – Greenfields Woolscouring Site

Further to your inquiry regarding the timeframes to obtain consents for a Greenfields Woolscouring Facility in Timaru or Napier/Hastings.

We understand that this relates to the possibility of a competitor establishing a facility in competition to yourselves in the above areas.

We expect that the consents that would be required would be similar to those which you hold in these areas at present, being consent to take water, discharge of dust/woolfibre(treated) and products of combustion (boilers) to air, stormwater discharge and discharge of trade waste to the municipal sewage system.

Given our experience working with your facilities over the last few months, it is clear that the discharges to the environment from woolscouring activities are low level when compared to other industrial activities, and easily managed to ensure minimal environmental effects.

For a greenfields site, it would be our expectation that an appropriately designed and located facility, established with the best possible equipment and operated under effective management systems, procedures and controls, would be able to be consented in a straightforward manner in less than 6 months. A facility which is purely gas fired (such as yours in Awatoto) or able to tap into a commercial, area wide heating facility (such as the facility in Washdyke) would be even more straightforward to consent (feasibly 3-4 months), as it is the air emissions which have the greatest potential for effects and emissions from a coal-fired boiler are greater.

Design would be expected to incorporate stormwater management, some degree of wastewater treatment (similar to what Cavalier has in place to prevent fibre entering the municipal system) and stack heights which comply with Council limits/guidelines. The appropriate zoning would be industrial, in an airshed which is not extremely sensitive, although a site in a remote rural location could also be appropriate. Efficient equipment would include efficient boilers, and air treatment via cyclones. Management systems would need to demonstrate there are procedures in place to ensure all the equipment is maintained, operated and inspected regularly. We would expect that a party wishing to establish a new facility would act prudently, and consider the above in site selection and plant design before committing to the consenting process.

It is always possible that an affected party could appeal the consent process and push the application to the environment court. To do so, they need to have good grounds, and we note that there is protection under the RMA to prevent anti-competitive behaviour. Even if pushed to the environment court, the possibility of a 2-3 year consenting process which you refer to would be at the drawn out end of the scale, usually the domain of significant and controversial



LANDPRO

Make the most of your land

📍 **Cromwell**
Unit 7, Cromtrade, 2 McNulty Road
PO Box 302, Cromwell 9342, New Zealand

📍 **Gore**
23 Medway Street
Gore 9710, New Zealand

0800 023 318
info@landpro.co.nz
www.landpro.co.nz



Winners Central Otago
Business Excellence
Awards 2013

projects. Unfortunately it is these controversial projects which the general public are made aware of by the media, and we believe they create a distorted impression that obtaining consent for anything will take a number of years. Appeal is a risk that every consent applicant faces, the right to do so being inherent in the RMA. We would note that with good consultation with neighbouring parties, and again, good selection of a location, plant & equipment, the likelihood of an appeal would be low.

Please do not hesitate to contact me if you have any questions or require any clarification.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Hooper'.

Kathryn Hooper
MNZPI