



Environmental Management Services

22nd December 2014

Ref: MTHBW002

Cavalier Wool Scourers Limited
Private Bag 6014
NAPIER 4142
Attention: Tony Cunningham

Dear Tony,

RESOURCE CONSENT ENQUIRY

You have asked what time would be required to obtain resource consents for the establishment of a new wool scouring operation at either Napier or Timaru. Your question is whether two to three years would be a realistic expectation. My response is as follows:

Land Use Consent

If we assume that the site chosen for the proposed wool scouring plant was within an existing Industrial Zone and that there was otherwise nothing unusual about, for example, the height of the building, or distance from boundaries, then no land use consent (and therefore no time to obtain a land use consent) would be required.

The situation would be different if the site chosen for the plant was *outside* an industrial zone. In that case a land use consent would be needed and could turn into a long and expensive process of two or even three years – if indeed consent was obtained at all.

However, given that there is (in my understanding) no shortage of suitable industrial zoned land either in Napier / Hastings or at Washdyke in Timaru, then I would see no obvious reason why a new plant would need to be sited outside of the existing industrial zones.

Water Take

If a new plant is established then consent might also be needed for water take (that is, the taking of either ground or surface water for processing purposes). My understanding is that typical daily usage for a wool scouring plant would be around 1,000 – 1,200m³/day (which equates to an average of up to 14 L/sec over 24 hours).

If all of this water was obtained from municipal supply (which is likely to be available if the site is in a Wet Industrial Zone) then once again no consent will be required. The consent for the taking and supply of that water will already be held by the local authority.

If, in the alternative, water is to be sourced from an on-site bore then – unless the site already comes with an existing bore and water permit – a consent would need to be obtained for the taking and use of that water.

I have made enquiries with Hawke's Bay Regional Council and with Canterbury Regional Council as to the likelihood of obtaining consents for the extraction of ground water from the Awatoto or Whakatu industrial areas (in Napier / Hastings) and the Washdyke industrial area in Timaru. Both Councils have advised that there is water available for taking in these areas and that they would not foresee any great difficulty in obtaining consent.

The consents would most likely be treated as 'non-notified' and issued within about 20 working days of the date of the application being lodged.

Wastewater Discharge

If we again assume that the site is within an existing Wet Industrial Zone then the site will have existing municipal wastewater reticulation. If so, and if indeed the municipal wastewater connection is used, then there would be no need for a separate wastewater discharge consent for the plant itself. The consent for the discharge of the effluent will be held by the relevant local authority which operates the wastewater treatment station and outfall (with Napier, Hastings and Timaru all having current long-running consents).

All that the local authority will require is that the wastewater that is received by them is compliant with standards set out in the local authority wastewater bylaw.

Only if there was a proposal to do something unusual with the wastewater, such as for example irrigating it to land rather than discharging to the municipal reticulation and treatment system, would a consent be required. That would be a less certain process and could take, say, 6 – 12 months, with no ultimate guarantee of consent being granted.

Air Discharge

Air discharge consents are likely to be required for the plant – for the control of odours, boiler-emissions, and for the control of dust. There are, however, usually fairly standard technologies now available for the treatment of these sorts of emissions and I am certainly unaware of there being any historical issues with dust or odour from your existing plant. I would therefore expect that a consent application for air discharges for a similar kind of plant would simply replicate that same technology and that the Council would be unlikely to find fault with it. On that basis I would not expect that the consent would be difficult to obtain. It would most likely be considered as a non-notified application and granted within about 20 (maybe 40) working days. The consent application itself I estimate would take about 1 – 2 months to prepare and have ready for lodgement.

In Summary

I conclude:

1. **Land Use Consent:** It is reasonable to expect that a new woolscouring plant would establish in an existing Wet Industrial Zone. If so, and unless there was anything particularly unusual about the plant (height, distance from boundaries) no land use consent would be required. Industrial activities, in an Industrial Zone, are generally 'permitted as of right'.

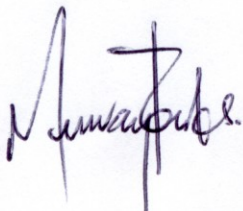
2. **Water Take:** If the plant has connection to an existing municipal water supply (highly likely, if the site is in an existing Industrial Zone) then no separate resource consent will be required for the taking and use of this water. Alternatively, water can be taken from an on-site bore. In that case a consent *would* be required for the water-take but I am informed by the Hawke's Bay and Canterbury Regional Councils that it is unlikely there would be any problem – or delay in obtaining consent – if groundwater was to be abstracted at Awatoto, Whakatu (Napier / Hastings) or at Washdyke (Timaru). In each of areas there is water available.
3. **Wastewater Discharge:** If the site is within an existing Wet Industrial Zone then it would be reasonable to expect that wastewater services will be supplied by the local authority. In that case the local authority holds the discharge consent and no separate consent is required for the plant. The plant must only comply with whatever standards are set out in the local authority wastewater bylaw.
4. **Air Discharge:** I assume that existing standard technologies for odour and dust control are working successfully at your current plant and that these same technologies would be put forward in any future consent application for air discharges from a future plant. If so, I would not foresee any major problem or delay with the granting of air discharge consents. I estimate 20 – 40 working days from date of lodgement of consent to granting of consent. The application itself would probably take about 1 – 2 months to prepare and have ready to lodge.

Overall, therefore, unless there was something unusual about the proposed wool scouring plant, the only real consent requirement would be for the obtaining of air discharge permits. That process I estimate would take a total of 2 – 4 months (allowing 1 – 2 months for preparation of the consent application and another 1 – 2 months for processing and granting of the consent).

This would be substantially less than 2 – 3 years. The scenario of a 2 – 3 year consent process I believe would only be realistic if the intention was to establish the plant outside of an existing industrial zone. If that was the case then, yes, 2 or even 3 years would be possible – if indeed consent was granted at all. However, as there is (in my understanding) currently no shortage of suitably zoned industrial land at either Napier / Hastings or Timaru, then I would see no obvious reason for a site to be chosen that is out-of-zone.

I trust this answers your enquiry. If you have any further questions, please do not hesitate to give me a call.

Yours faithfully
Environmental Management Services Limited



Murray Tonks
Director