

Our reference: APP-20171302  
Enquiries to: Emily Allan  
Email: Emily.Allan@es.govt.nz

21 June 2017

South Dairy Limited  
C/- D C & S M Alexander  
373 O'Shannessy Road  
RD 1  
Winton 9781



Dear Sir/Madam,

***Request for Further Information under Section 92(1) of the Resource Management Act 1991 - Application for a discharge permit, a land use consent and a water permit.***

Thank you for lodging an application to discharge dairy shed effluent from up to 750 cows to land by cobra rain gun, slurry tanker or umbilical system, to take up to 90,000 l/day of groundwater and expand a dairy farm at O'Shannessy Road, Lochiel. I require further information before a determination can be made on your application.

Please provide[1], in accordance with Section 92(1) of the Resource Management Act, the following information:

**Overseer And Application Details**

- Confirmation that all 750 cows and other stock will be wintered off farm.
  - Alternatively, if the applicant is intending to winter on farm please explain the amount of stock/stock type and crop area/type and if this has been modelled in Overseer.
- Confirmation that the proposed number of cows will be 750, not 780 which has been modelled in Overseer.
- Electronic Overseer files for the scenarios modelled in the application. I require this information to be able to consider the nutrient budgets provided with the application. This is also to ensure that the budgets have been completed in accordance with the relevant guidelines.
- An explanation for the nitrogen attenuation figure used in the application on page 28 as 97% seems very high. This is important for understanding the effects of the activity.

**Good Management Practices**

- While I can see that you have included some general good management practices (GMP's) on page 20 and page 36 of the application, further details are required. Could you please provide clarification for what you are proposing as GMP's and what you are proposing as mitigations. With regards to the mitigations, please identify why these are going above good management practice and assess the effectiveness of these mitigation measures.

## Assessment of Effects

- Identify the effects of the application when comparing the current activity with GMP's to the proposed scenario. This is necessary to establish the existing environment for the site.
- An assessment of the effects with regards to sediment loss, microbial loss and the total nutrient loss from using the land for dairy farming, not just the aerial load from the collected effluent, on water quality and soil health in the receiving environment and the values associated with it (including Iwi values and values included in Policy 31C of the Regional Water Plan – RWP).
  - I require this information in order to understand what the effects of the activity are likely to be on the receiving environment. Whilst Overseer presents a scenario, the effect on the values of the receiving environment of the 'losses' need to be assessed.
  - In the application (page 28) a table has been included with regards to Oreti Catchment Nitrogen Load using a number of modelling tools. Could you please assess the effect of the proposed activity on the cumulative losses represented in this table. How does this relate to objectives 2, 8 and 9C of the RWP.

## Policy Assessment

- An explanation for why the application is consistent or inconsistent with Policy 15 and Policy 16 of the proposed Southland Water and Land Plan (pSWLP). On page 10 of the application, it is stated that the application is consistent with these policies. However, I consider that a thorough assessment should be undertaken as this policy provides a strong direction on the granting of resource consents for additional dairy farming of cows. This assessment needs to identify and detail how the application is consistent with these policies with regards to the assessment of effects and the proposed mitigations. I am requiring this information because:
  - Schedule 4 of the RMA states that all applications must include an assessment of the activity against any relevant provisions of a document referred to in section 104(1)(b) and that the assessment under sub-clause (1)(g) must include an assessment of the activity against any relevant objectives, policies, or rules in a document including those in a proposed plan.

## Effluent System Details and Dairy Effluent Storage Calculator

- Confirmation of the proposed pond volume as multiple figures have been used in the application, is this 3,060 or 5,060 cubic metres?
- An explanation for how the effluent system will operate in the interim before the new effluent storage is constructed and is operational. What contingency measures are in place to mitigate any interim effects?
- An explanation for how the proposed storage volumes are consistent with deferred storage as determined by the Massey Pond Calculator.
- An explanation of the inputs into the Dairy Effluent Storage Calculator and adjustment to the inputs if required as follows:
  - The minimum effluent block has been put at 20ha rather than 60ha which is consistent with 8ha/100 cows as a best practice guide. Could you please provide a revised calculation which matches the value in Overseer needed to achieve 150kg/N/year or the best practice guide, or provide a suitable explanation for why 20ha is appropriate.

I require the above information in order to determine the relevant rules and to audit the potential effects of the activities that have been applied for. The determination of the application is postponed until receipt of this information.

Under Section 92A of the RMA you have until 15 working days from the date of this request, which we calculate to be **12 July 2017**, to either provide the information, tell the Council, in writing, either that you agree to provide the information or that you refuse to provide the information.

If you refuse to provide the information requested, or if you do not respond to this request, the Council may decline the application on the grounds that it has inadequate information to determine the application.

Please contact me if you have any questions regarding this request.

Yours sincerely



Emily Allan  
**Consents Officer**

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[1] Under Section 92(1) of the Resource Management Act 1991 (RMA) the Council may, at any time before the hearing of an application, or if no hearing is to be held, before the decision to grant or refuse the application is made, request in writing that the applicant provide further information relating to the application.

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Enquiries to: Emily Allan  
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21 June 2017

Civil Tech Limited  
PO Box 1558  
Invercargill 9840

Dear Murray,

***Request for Further Information under Section 92(1) of the Resource Management Act 1991 - Application for a discharge permit, a land use consent and a water permit.***

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Emily Allan  
**Consents Officer**

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