

Tabled 28/11

Submission to:

Urban and Services Plan Changes Hearing Panel

From:

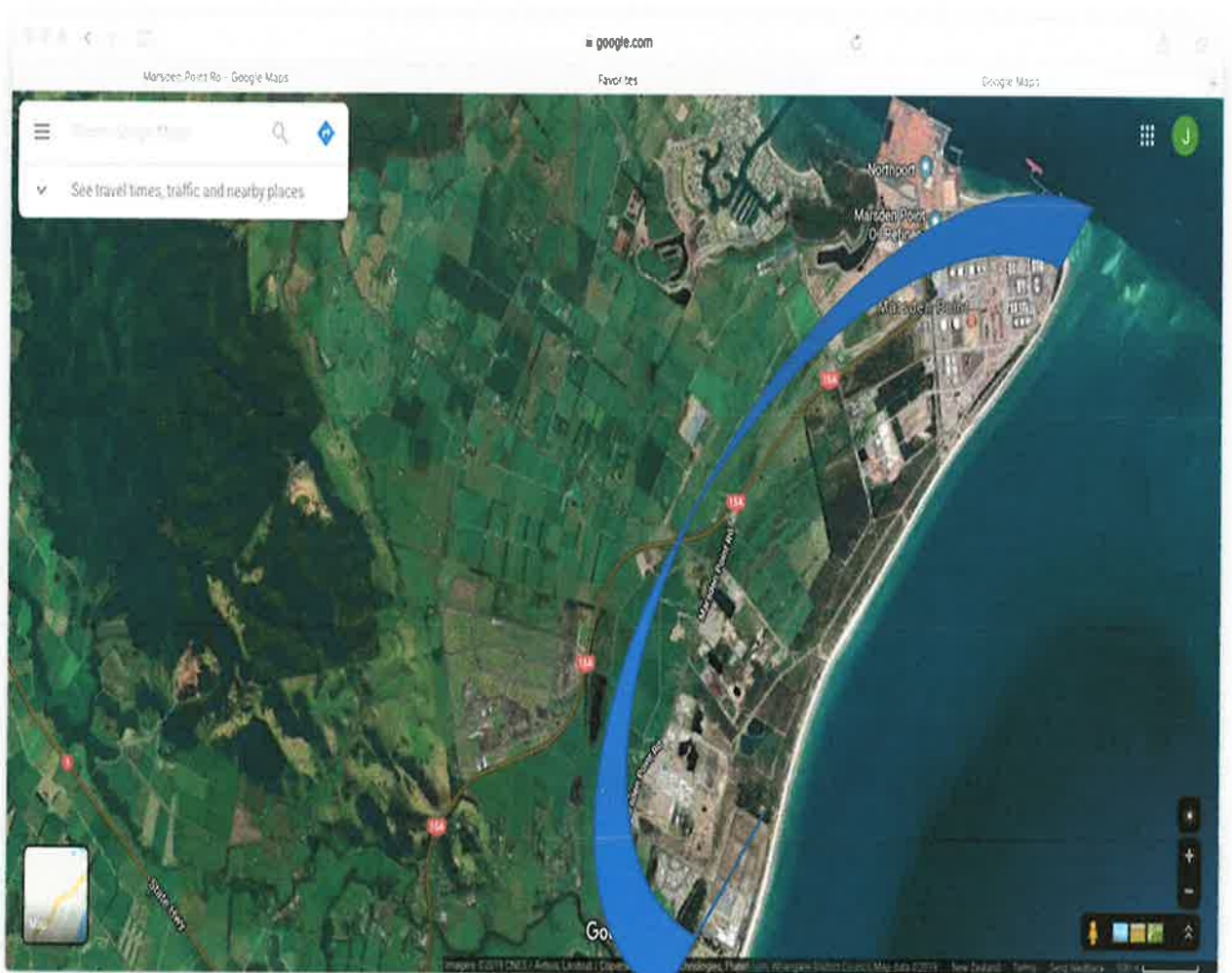
Marsden Metals Group Ltd

And

NPR Ltd

Subject: Urban and Services Plan Changes in respect of Heavy Industry proposal to replace Business
4 Zoning.

This submission relates entirely and specifically to the area of land on the right hand side of Marsden Point Road and Port Marsden Highway as seen below.



Historical background.

This section of land runs along the right hand side of Marsden Point Road and Port Marsden Highway down to the entrance of North Port and RefiningNZ. The eastern boundary of this land is a buffer of Doc land that in some places would be approx. 2 hectares in width. Beyond that is the Northern end of Ruakaka beach. Known locally as 'the power station beach'.

In the 1960's this land was farmland. The Government at the time purchased two areas, one at each end of this stretch of land. At the entrance to the Whangarei harbour they built an oil refinery. At the Southern most end, two coal fired power stations were built.

One power station operated briefly the other was mothballed without ever being operated.

In the first 40 years since the establishment of these two significantly heavy industry operations, development of the land between them was very slow.

Approximately 20 years ago Mr. John Keith purchased a large section of this land to establish a mining operation for the mining of sand.

Shortly afterwards Carter Holt Harvey set up a large timber processing plant nearer the Northern end of this strip.

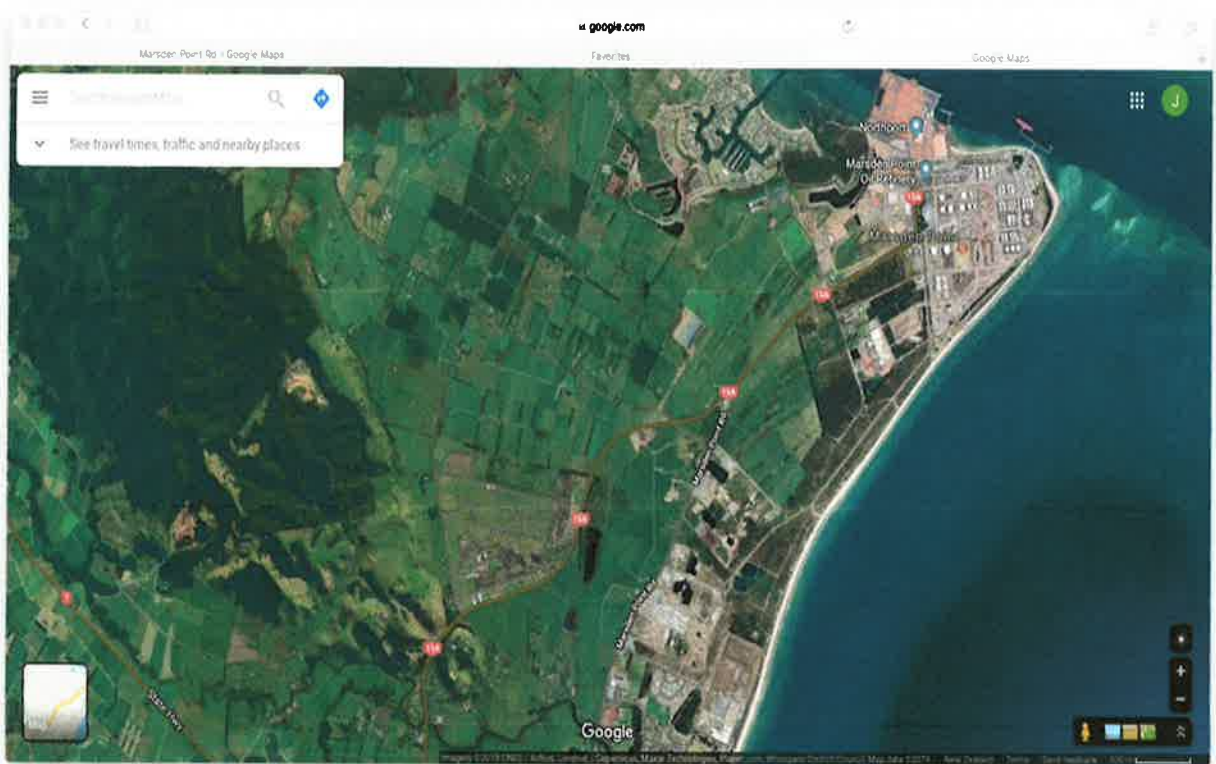
These were the only significant industrial developments until just over a decade ago.

In the past 10 years development has progressed at a significantly quicker rate.

As Mr. Keith finished with his mining activities on sections of his land he developed them into industrial parks for resale. I was not able to see from information on the Council website when the land between the refinery and the power stations was re-zoned business 4. It seems in fact that the process was rather one of taking each opportunity for development and re zoning it to meet the need of that proposed application.

This process has it's merits particularly in a slow developing environment where there is clearly time to consider each application as it comes before council. This process we are all participating in today however is far different from that. We need to look to the future and make difficult decisions based on limited knowledge of what that future holds.

What activities are currently being undertaken on this area of land now.



As can be seen from this aerial shot the areas that appear brownish in colour are the in-use areas of the land from the original sites of the power stations down to refiningNZ. Here is a list of the business's that I know of that operate off this stretch of land.

1. Niwa Fisheries
2. Moana Paua production
3. Northsaw Lumber
4. Northpower substation
5. SPI Engineering
6. Marsden Metals Group
7. Rudolphs sand blasting
8. Busck Prefab concrete plant
9. Daltons soil and bark storage
10. Altas Concrete Plant
11. BP Truck Fuel stop
12. Match transport and sawdust stock pile facility
13. Rowsells Panelbeaters
14. Point Timber (timber Merchants)
15. JB Cabins (pre fab housing)
16. Storage for hundreds of tonnes of swamp Kauri

17. LVL (carter Holt) laminating timber plant
18. Second Northpower substation
19. House moving company
20. Whangarei District Council waste water plant and settling ponds.
21. Korean Timber processing plant
22. Weighnorth logging truck weigh bridge and trailer lifting facility
23. RefiningNZ
24. Boc Gas Plant
25. Solvent solutions (waste chemical disposal plant) now not operating now being re-established as a fertilizer storage facility

I note that on Page 29 of part 5 Industry Section 42A Hearing Report from Melissa McGrath Planner for the Whangarei District Council, she makes the following comment on her preferred option for designation of HI land zoning.

*"I consider that it is more critical to consolidate and provide for these activities within the Hi while **managing** potential reverse sensitivity effects from incompatible activities, than it is to maintain land supply for large scale heavy industry".*

From this I understand that Ms McGrath is saying is that Hi and LI should be consolidated (meaning brought together in one area).

Where she talks of managing potential reverse sensitivity, I am wondering how she would see this working.

Ms McGrath in her recommendations also supports the 8000sq mtr site proposal for HI operations. This is sensible particularly when a number of the existing and planned operations on this strip of land already cover at least 8000sq mtrs for their operations. Part of the need for such a large space to work in comes from the need for many of these industrial operations to accumulate stock piles, which I would imagine are difficult to MANAGE IN TERMS OF THE POTENTIAL REVERSE SENSITIVITY.

Lets look back at that list of current operators.

1. Atlas concrete (stock pile sand)
2. Marsden Metals Group (stock Pile steel)
3. Northsaw Lumber (stock pile timber)
4. Daltons (stock pile soil, bark, etc0
5. Matich Transport (stock pile sawdust)
6. The new Fertilizer operation (stock Pile Fertilizer)
7. The storage facility for the Swamp Kauri (acres of stock piles wood)
8. Busck (stock pile of material for concrete production)
9. John Keith Sand mining operation (stock pile sand)
10. Korean timber process plant (stock piles of off cuts of timber)
11. The WDC wastewater system

Almost 50% of the heavy industry operations currently in this area require stock piles of materials that could be difficult to manage in terms of reverse sensibility. They cause irritation when high

winds are blowing (which happens often on our peninsular), in the case of our metals stock pile, The light gauge steel (for example used roofing iron), we stock pile for our baling process can become quite noisy when it rattles around with the wind. The biggest potential hazard of course is not necessarily the smell or irritation from wind factors, it is the potential for combustion to occur with these stockpiles. Timber, fertilizer, sawdust, bark, and even metal can all when exposed to intense heat from an outside source become a potential fire hazard.

Ms McGraths concern appears to be about the potential to have large areas of land set aside for HI zoned land that would prove to be used for this purpose. I believe that from what I have read from the 2018 report on the Tauranga City Industrial Land Survey, we should be looking at other areas within New Zealand where similar planning has been required to measure the potential for growth and need.

Overview from that report.

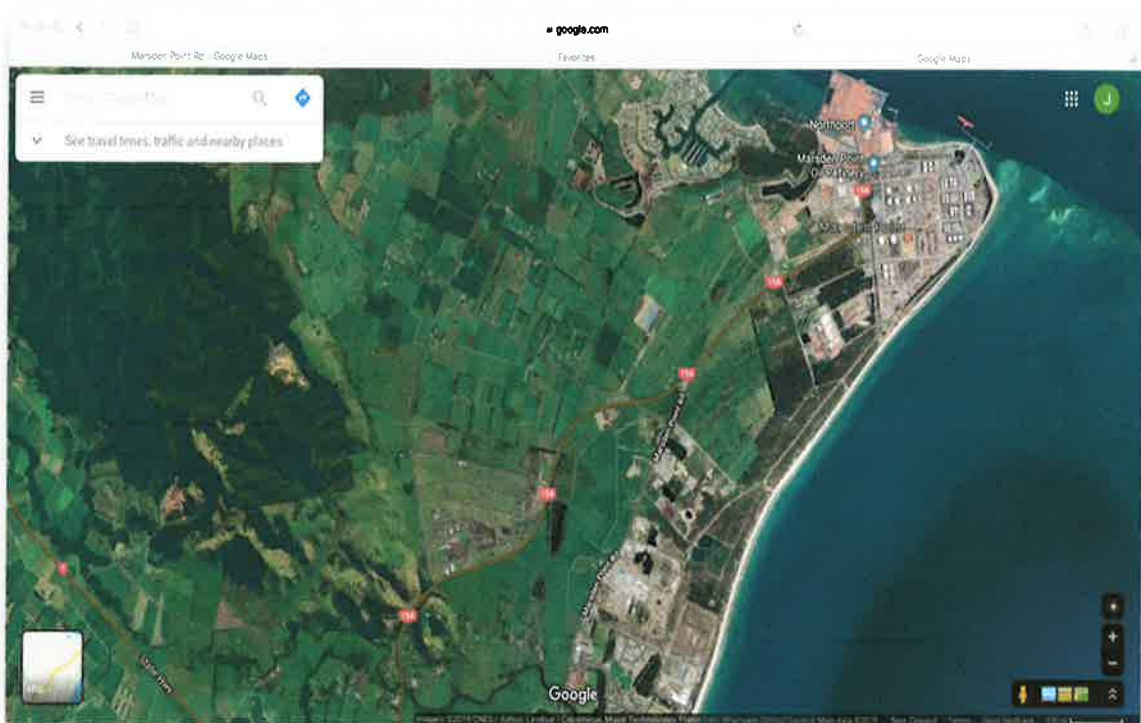
The Housing and Business capacity assessment completed for Smartgrowth in 2017 identified that industrial land provision was sufficient in the short term (three years to 2020) but that in the medium term (3-10) years to 2027 further industrial land provision would be required.

There is no distinction within the report between heavy industry zoning and other industry zoning. The graphs on page 6 of this report show the total land area available for industrial use at Mt Manganui is 268 hectares, The total occupied within the port security fence is 156 hectares outside this area around the port is approx. 26 hectares.

The total Industrial land in the Tauranga city is 831 hectares currently occupied 524 leaving 307 hectares This does not actually represent available land as areas such as the land around the airport which is a safety buffer zone are currently not available for development. The report also identifies that some of the areas within the industrial zone land are also zoned for non-industrial use this reduces the amount of land area available for industrial activity.

The uptake of industrial land on average for the last 3 years has been 10 hectares per year, over the last 5 years 7.5 hectares and the last 10 years 6.2 hectares (this last average of course includes the time of the GFC) Page 15 of the report states "applying the last three year uptake average of 10 hectares per annum to the 'net' (includes non RTG and non usable areas. Estimates project a further 21 years of supply only.

The report goes on to identify that certain factors could reduce this time frame for the availability of industrial land. They include more significant increases in population than planned for, delays in the provision of key infrastructure and the non-industrial use of industrial land.



Again lets look at the aerial map of the land currently used predominately for heavy Industry. The shaded brown areas are those already used. The green areas are the only area's still used for grazing of farm animals. I understand there is the potential for the development of a large scale gasification plant to dispose of all of Northlands landfill waste. One of these as yet undeveloped sections of land would provide an ideal place for such an operation.

Lets go back to this idea of managing reverse sensitivity effects.

To do so I would like to share with you Marsden Metals initial experience of operating our business in a mix use environment at Kepa Road in Ruakaka.

Case Study.

When Marsden Metals Group Ltd first relocated to Ruakaka from Auckland we purchased a property in Kepa Road Ruakaka. The area had a zoning that allowed us to operate a metals recycling facility on the site we purchased. The zoning also allowed for people to live on the site in that Road. During the time we were there other business activities such as:

Scaffolding company

Surf board Manufacturer (and surf shop)

Warehousing

Hairdresser

Secondhand shop

Tyre repair shop

Machining shop for tool making

Welding plant

There is no doubt that recycling Metal is noisy, industry, and at times smelly from the gas cutting and processing of old equipment that is constructed of metals. We and the council received constant complaints from our neighbor's regarding our activities. We endeavored to resolve their concerns regarding truck movements, the noise of loading and unloading material. The vibrations through the ground of materials handling equipment operating, however the irritation between our business and those other LI activities around us continued for the duration of our stay on that site.

After a few years we outgrew the site and so relocated our business to 482 Marsden Point Road, down a long driveway in an area our lawyers were able to confirm from council that activities such as ours were allowed. The site had previously been owned by Allied Concrete and was zoned business 4.

I am confused as to why the council on the one hand sees it as necessary to define Heavy Industry from Light Industry or other activities, yet believes there needs to be no distinction in terms of location or boundaries.

No one wants bare land languishing unused simply because there is no commercial desire for that site, however the last decade has clearly demonstrated that growth in heavy industry movements into the Ruakaka area is increasing, and the amount of desirable land for those activities on this strip is diminishing.

For all the reasons stated previously If a combination of HI and LI, residential, and retail activities are permitted to operate side by side there is the potential for continued and significant irritation and potential disaster.

What's more there is hundreds of acres of land on the left hand side of Marsden Point Road beyond the Ruakaka Retail sector. And within the Marsden Maritime holdings land across Marsden Bay drive from the Port land itself. LI activities are already being developed at MMH, and on the Marsden City industrial site. It is difficult to justify the cross contamination of zoning in this historically known heavy industry area.

Ms McGrath makes a case for a distinct Precinct for a Technology Park to be set aside for future development . This is a 100 acre site that at present has not one single facility either planned or built on it. On the other hand the HI area of land referred to in this submission is already significantly developed with planned projects that will use up large sections of the as yet undeveloped areas. She sees this as a potential waste of land use.

One of the reasons for parts of the land in this Heavy Industry belt not being taken up results from the lack of infrastructure not being put in place. In the area of land known as Lakeside development park where our property is situated the sealed road is less than 6 mtrs wide which causes issues when large truck and cars need to pass each other. The comms cabling that was put in by the developer is unworkable resulting in the need for business's relocating onto this industrial park to use 4G internet rather than copper cabling. There is no stormwater or wastewater systems in place. All, of these infrastructure amenities would make that particular piece of land more desirable to more (HI) development.

What is happening right now on Lakeside Industrial Park.

Over the past 18 months there has been an increase in the number of non industrial activities that have been allowed by the council to operate within this area.

Activities such as:

- Restaurant
- Yoga Studio
- Living environments such as old and non mobile buses, relocated but not code compliant buildings used as domestic dwellings,
- Clothes shops
- Dog walking park
- Dirt track racing (although I see this activity as being the closest in terms of noise dust etc to heavy industry and one which could possibly be given a notifiable extension).
- Toy library

The roading infrastructure on some of this stretch of land lacks the necessary structure for walking, or parking on the side of the road.

Summary

This submission supports the Council planning for the clarification of zoning names, from business 2 and 4 to light Industry (LI) and Heavy Industry (HI). This change provides clarity of definition and intent for business's looking to relocate or set up in this area.

The stretch of land as mention here in this submission from Sime Road at the South end to the Refinery at the northern end is predominantly heavy Industry in terms of use. I submit that the zoning should match both the historical and current activities. Heavy Industry zoning along this belt with the minimum lot size being 8000sq mtrs.

The land needs to be set aside at least until the next 10 year plan, as (HI) only to ensure that essential heavy industry activities that will enhance the overall development of this area are given an equal chance to develop.

Janine Abernethy

Director

NPP Ltd

Project Manager

Marsden Metals Group Ltd