

BEFORE THE HEARING PANEL IN PAROA

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions in relation to the Proposed Te
Tai o Poutini Plan

**STATEMENT OF PRIMARY EVIDENCE OF ROBERT JOHN KINNEY ON
BEHALF OF ISAAC CONSTRUCTION LIMITED (S258) (FS106)**

INDUSTRIAL AND COMMERCIAL ZONES

Dated: 30 May 2024

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INTRODUCTION

1. My full name is Robert John Kinney. I am the Chief Executive Officer of The Isaac Conservation and Wildlife Trust and prior to April 2024, the General Manager Special Projects and Land for Isaac Construction Limited, a role I held for three years. From the 1st of April I assumed the role of Chief Executive Officer of Isaac Land Holdings Limited.
2. In my role with Isaac Construction, I was responsible for maintaining, enhancing and developing Isaac Construction and Isaac Land Holdings Ltd's property interests outside of Christchurch. Of relevance to this evidence, since 2021 when Isaac Construction purchased the assets of Liddell Contracting Limited, I have had operational oversight and assumed the landlord responsibilities for the properties on the West Coast that were part of that purchase. This included setting of annual rents, initiating a project to upgrade the existing buildings to meet 100% of the NBS code, and improving infrastructure and service and sanitary provisions. I am also responsible for insurance matters as they pertain to the Isaac Group.
3. My qualifications include a Bachelor of Science (Hons.) from Canterbury University. I am a Fellow of the Institute of Quarries and I hold an A-Grade Quarry Managers Certificate of Competency.
4. I have prepared this statement of evidence on behalf Isaac Construction in respect of matters arising from Isaac Construction's submissions and further submissions on the Proposed Plan.

Scope of evidence

5. My evidence relates to those parts of the submissions and further submissions of Isaac Construction that relate to the Industrial and Commercial Zones hearing, and specifically my evidence supports the submission by Isaac Construction that seeks to rezone part of its site from Light Industrial Zone (LIZ) to General Industrial Zone (GIZ).
6. My evidence will outline:
 - (a) The Isaac Construction landholdings at Kaiata (**the site**)
 - (b) The current activities undertaken at the site; and
 - (c) Anticipated future activities at the site.

ISAAC CONSTRUCTION LANDHOLDINGS AT KAINGA

7. Isaac Construction owns 98,186m² of land located at Fairhall Road. The property is split across two titles being Lot 2 DP508311 comprising 90,096m² and Lot 18 DP338867 comprising 8,090m². The site is flat with minor undulations across its length. The site is bisected by a main transmission line and the easements reflected on the Certificate of Title – the heavy vehicle access to the site follows the path of the easement. I refer the Panel to Attachment 1 of the Section 32 report attached to Ms Seaton’s evidence for a copy of the Certificate of Title.
8. The majority of the 90,096m² (Lot 2) title has been improved with gravel surfacing, concrete and asphalt paths and the removal of the “iron pan” to assist drainage of the site. Site offices, workshops, paint facilities and buildings make up the balance of the site. The site is accessed via two entranceways. The northern most is a shared driveway and offers light vehicle access to the Liddell Construction Offices. The heavy vehicular access is further south along Fairhall Road and is on the boundary of Lot 18 and Lot 2 and follows the power transmission easement as outlined above.
9. The 8,090m² (Lot 18) site is undeveloped and still has the grass surfacing and iron pan drainage. This is zoned GIZ under the Proposed Plan and will require significant work to allow development.
10. In terms of current servicing and infrastructure, Lot 18 is unserviced. Lot 2 currently is serviced by way of sewer to septic tanks, water via roofwater and stormwater to ground. Electricity and telecommunications are provided to Lot 2.
11. I refer the Panel to Figures 1 and 2 of Ms Seaton’s Section 32 evaluation, which show an aerial photograph and zoning plan for the site, respectively.

THE CURRENT AND FUTURE ANTICIPATED ACTIVITIES AT THE SITE

Current Activities

12. Isaac Land Holdings leases the site to Isaac Construction Limited. Isaac Construction Limited have two divisions occupying the property, being Isaac Construction, and Liddell’s Construction. Isaac Construction complete work on the Grey District roading network including three waters infrastructure, road base construction, road surfacing, and traffic

management and traffic signage services. Liddell's are predominantly a heavy civil structures company, completing bridge building, piling, and infrastructure maintenance. The site includes a painting and blasting facility and a metal fabrication facility. Complementing both the Liddell and Isaac businesses is a mechanical workshop.

13. Three non-Isaac related business comprise the remainder of the tenancies. The first of these is Elgas who provide a service of storage, delivery and refilling of industrial and domestic gas. Elgas have an existing bulk LPG gas storage onsite. This provides both industrial and domestic gas for distribution to retail customers.
14. Fosters Firewood occupy a large area between the dual entrances to the main site. Fosters Firewood are a wood processing facility that store unprocessed logs on site and then manufacture these raw logs into firewood. Once processed the firewood is stored in tunnel houses for drying before sale. As well as the tunnel houses, two temporary hooped shed structures have also been built on the property.
15. Rio Tinto also rent storage space across the yard. Currently there is a spent cell liners processing machine stored at the site. The processing machine was installed at Holcim Cement in Westport and was decommissioned on the demolition of Holcim Westport Cement works.
16. Isaac Construction and Liddell Construction have site offices which support their business units as well as raw aggregate material storage across the yard and structural metal, formwork, moulds and ancillary plant storage across the yard.
17. Landscaping at the site is predominantly restricted to the boundary areas.

Future Anticipated Activities

18. The Isaac Land Holding's Strategy is to enhance the value of its land holdings and continue to provide a passive income stream to the Isaac Construction Business and ultimately the Isaac Conservation and Wildlife Trust. To achieve this, Isaac Construction seeks to enable more flexibility for the range of industrial land uses that could establish at the site, than the Proposed Plan currently allows as permitted activity, by rezoning much of the site from the currently proposed LIZ, to GIZ. I accept Ms Seaton's

evidence that a LIZ would be a more appropriate use adjoining the more sensitive Residential Zone, and the Open Space Zone, to the east.

19. The Isaac companies have had enquires of a design-build nature from external parties over the past few years for a variety of industrial uses, including the siting of a concrete facility and potential warehousing and cold storage facilities. Concrete facilities, for example concrete batching, can involve plant of substantial height, while warehousing and cold store storage often require extensive floor areas (i.e. large areas of building coverage).
20. Other possible developments at the site include an asphalt plant. The Isaac Construction business has recently invested in an Asphalt mixing and batching plant in the Nelson region. The plant is of a substantial height. It is likely that at some stage in the next 3-5 years, that Isaac Construction will conduct a feasibility study to install a similar plant at the Kaiata site, within Lot 2.
21. The examples I list above support my opinion that as much zoning flexibility as possible should be afforded to the Lot 2 site, so that we are well positioned to respond to business demands whilst minimising the likelihood of needing to obtain resource consents for matters such as excess height and building coverage, with the costs and uncertainty that typically accompany those planning processes.
22. In regard servicing, the site is able to accommodate stormwater discharges (currently to tank for reuse) and service for electricity and telecommunications. We have the option of extending the existing municipal water supply from the adjoining council vested assets at Kaiata Park. At present we have a small sewage treatment facility that is large enough to accommodate additional development. Should further sewage networks be required there is still sufficient areas on the site which could be used for this purpose. Should additional sewage disposal be required beyond the onsite treatment systems. Like the water, a possible future connection for the sewer or trade waste may be able to be made into the Kaiata Park infrastructure, though I have not confirmed the feasibility of that option.

23. In my opinion, further development within the site can be efficiently and effectively serviced with infrastructure, including by way of upgrades if necessary. I note that the existing industrial zoning of the site indicates that Greymouth District Council shares this view.
24. To my knowledge, available, flat, well serviced (logistically and for energy etc.) land is relatively scarce and tightly held. In addition, low natural hazard industrial land is also scarce. The Isaac Kaiata site is a low flood and inundation risk, and remote from any coastal inundation risk. It is not subject to any of the natural hazard risks mapped in the Proposed District Plan. This further supports enabling a more intensive industrial form on the site, consistent with GIZ zoning.

CONCLUSION

25. For the reasons set out above and in the evidence of Ms Seaton, I support retention of the Light Industrial Zone on Lot 18 DP 384771, and the perimeter of Lot 2 DP 508311 – 37 Fairhall Road.
26. I consider it is appropriate to rezone the majority of 37 Fairhall Road to General Industrial Zone as set out in Ms Seaton's evidence, to enable more efficient development and redevelopment of the site, and greater flexibility to respond to a wide a range of business demand for industrial land within the District and West Coast more generally.

Date: 30 May 2024

Robert Kinney

