

Response ID ANON-URZ4-5FUJ-F

Submitted to Fast-track approval applications
Submitted on 2024-05-02 12:50:36

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
National Green Steel Limited

2 Contact person

Contact person name:
Vipan Garg

3 What is your job title

Job title:
Director

4 What is your contact email address?

Email:
vipan@nationalsteel.co.nz

5 What is your phone number?

Phone number:
021704000

6 What is your postal address?

Postal address:

29 Hobill Ave
Wiri
Auckland 2104

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

61 Hampton Down Road, Hampton Downs, North Waikato

File upload:
Locality Plan.pdf was uploaded

Upload file here:

Landowner Agreement.pdf was uploaded

Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

Titles - 61 Hampton Downs Road.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

MJ and LJ Peters Limited

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

The applicant company has signed a Sale and Purchase Agreement to purchase the land off the current owner. The owner has also written in a letter agreeing to the project being through the Fast Track Process - this letter is attached to the application.

Section 2: Project details

What is the project name?

Please write your answer here:

Green Steel

What is the project summary?

Please write your answer here:

This project is to manufacture new structural steel by using an Electric Arc Furnace and Rolling Mill. The plant will utilize recycled scrap steel, sourced from across New Zealand, and shredded on site for circular economy. A small solar farm on site will provide some of the electricity needed.

What are the project details?

Please write your answer here:

The objective is to make steel production sustainable in New Zealand. This will involve the development of a \$90-110m steel 'mini-mill' using recycled scrap metal, not iron ore or iron sands, as the basic input. It would use Electric Arc Furnace technologies to produce high quality structural steel with a far lower carbon footprint than existing processing and production methods used in steel production in New Zealand. Alongside the mill will be a scrap steel shredding plant utilizing scrap sourced from throughout NZ. Some of the needed electricity would be sourced on site via a proposed new solar farm. The mill would produce around 200,000 tonnes of various types of steel per year, providing around 200 new jobs at various skill levels in the Waikato region.

Currently NZ does not reuse steel, as all scrap is exported. Setting up a new greenfields steel plant using existing NZ scrap steel is consistent with the concept of a circular economy and an obvious way to play our part in the global effort to reduce industrial emissions. Currently structural steel is imported.

Reconfiguring the world's iron and steel production to be consistent with the global goal of zero net emissions by 2050 – is the concept of 'Green Steel'.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

There are several stages:

1. Consenting, financing of the project.
2. Design completion.
3. Ordering and procurement of new plant from overseas.
4. Site development, construction and installation of plant.
5. Sourcing, employment, training of staff to operate the plant.
6. Operation.

See timing set out below.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource Management Act - resource consent.

Preliminary advice is that consent would be required as a discretionary activity under the proposed new Fast Track Approval legislation.

Consents would be required for a range of activities including, land use activities (eg earthworks, industrial activity), discharges (stormwater, air, wastewater), diversions (artificial watercourses), and noise. The land currently has a zoning of General Rural Zone under the Proposed Waikato District Plan.

There several other non-rural uses in the locality (see locality plan) including Springhill prison, Hampton Down Motorsport Park, Hampton Downs Landfill.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Waikato District Council, Waikato Regional Council.

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

There are no existing applications or notices on the same or a similar project.

Is approval required for the project by someone other than the applicant?

Yes

Please explain your answer here:

The current landowner, who has given his written support to the proposal and has also signed a Sale and Purchase Agreement in favour of the applicant.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

There are several stages:

1. Consenting, financing of the project (2024).
2. Design completion (2024).
3. Ordering and procurement of new plant from overseas (2024-2025).
4. Site development, construction and installation of plant (2025-2026).
5. Sourcing, employment, training of staff to operate the plant (2026-26).
6. Operation (2026).

Timeframes are dependent upon regulatory constraints, eg building consents, import requirements.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

1. Waikato district Council, Waikato Regional Council.

2. Relevant iwi authority and treaty settlement entity - Ngaa Muka Development Trust as representative of the marae cluster including Maurea, Horahora, Waikare, Taniwha and Okarea maraes, and on behalf of Waikato Tainui. Potentially Ngaati Naho, who we have had preliminary discussions with.

3. Potentially adjacent landowners including New Zealand Corrections, and Hampton Downs Motorsport Park may have an interest in the project, but the preliminary assessment of effects undertaken is they will not be affected by the project.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Waikato District Council. Green Steel has met on several occasions with economic development staff at the Council. Council has been very supportive of the project and initially provided assistance in locating potential sites for the project. A "pre-application" meeting was held with Waikato District planning and economic development staff on 15 February 2024 to discuss the Resource Management Act requirements for the 61 Hampton Road site.

Waikato Regional Council. A meeting with senior council staff was held on 1 May to introduce the project to the Council and to establish contacts for further discussion as the project proceeds. Apart from the regional policy direction of supporting the development of a circular economy in the Waikato Region, the Council also has an interest in protecting the health of the Waikato River through managing sediment and stormwater. The potential for providing for bus transport for staff to the site was also discussed. The Regional Council has agreed to participate in further consultation with Green Steel

as the project proceeds.

Iwi. Preliminary meetings have been held with representatives from Ngaa Muka Development Trust. Initial feedback has been very positive, particularly the provision of jobs in the district. We are still awaiting an invitation to make a formal presentation to the full Trust which will also involve representatives from the constituent marae that Ngaa Muka represents. The project has also been discussed with a representative of Ngaati Naho.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

None

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The Waikato Tainui Deed of Settlement was signed on 22 May 1995. The land subject to this application is not part of the settlement area.

The Waikato River Settlement (set out in the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010), requires activities in the catchment that affect the Waikato River to have particular regard to the vision and strategy set out in the Act. National Green Steel Limited is committed to working with the representatives of Waikato-Tainui - Ngaa Muka Development Trust - to ensure its activities do not adversely affect the Waikato River.

There are no known statutory acknowledgement areas covering the land subject to this project.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

There is no known protected customary right on the property.

Upload your assessment if necessary:

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Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

A number of potential effects have been assessed to determine if they will be adverse. These include:

- air discharges
- ecology
- traffic
- geotechnical
- stormwater and wastewater
- sediment control
- visual landscape
- noise

There are no adverse effects from the project - a separate summary paper is attached which overviews these issues and the reasons for the above conclusion on adverse effects.

Cultural effects will be discussed with Ngaa Muka Development Trust and potentially

Upload file:

Section 5 - Adverse Effects Summary Assessment.pdf was uploaded

Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

National Policy Statements:

- Freshwater management 2020
- Renewable electricity generation 2011
- Highly productive land 2022
- Indigenous biodiversity 2023
- NZ Coastal Policy Statement - not relevant

National Environmental Standards

- Freshwater 2020
- Greenhouse gas emissions from industrial heat processes 2023
- Assessing and Managing Contaminants in Soil to Protect Human Health 2011

An overview assessment of these documents is provided in the attached file. The project is assessed as being consistent with the of these plans/standards.

File upload:

Section 6 - NPS and NES Summary Assessment.pdf was uploaded

Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

The fast-track process would enable the project to be processed in a more timely and cost-effective way, using a balanced, inquisitorial process, managed by a panel of experts, as proposed by the Fast Track Approval Bill (Act) process.

Using Resource Management Act processes the likely recommended approach would likely to be a two step process. The first step would be to apply for a change to the district plan to rezone the land from General Rural to Heavy or General Industrial Zone. Rezoning would be a long process - experience shows a minimum of three years - and also a very expensive process.

Provided both councils did not agree to merge the plan change and two consenting processes together, the second step would be for National Green Steel Limited to apply for resource consents - needed from both the district council and the regional council. At this stage any opponents would have a further opportunity to relitigate issues dealt with at the plan change stage. This process could also take up to three years, so a minimum of six years using existing processes.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

In our view the proposal will be reasonably straight forward and efficient to process because:

- It does not have significant adverse effects like some projects (for example the site is not in a significant natural or landscape area and there are no

significant discharges).

- The site is reasonably isolated with few dwellings close by and therefore any concerns of local residents will be minimized, if there are any at all. The amenity of the area is already significantly affected with existing land uses (Motorsport, prison, landfill) but these uses are complementary to this proposal, and all of which occupy large areas of land in the vicinity of 61 Hampton Downs Road. The Waikato Expressway is located near the site on its eastern side. The proposal is not out of keeping with the evolving use of land in this Hampton Downs area.

Has the project been identified as a priority project in a:

Not Answered

Please explain your answer here:

The project has not been listed in any government, local government or sector plans or strategy.

There have however been discussions about the project over many months with Ministry of Business, Innovation and Investment (MBIE) and in particular Kanoa - Regional Economic Development and Investment Unit, part of MBIE. Kanoa has expressed support for the project during this time.

Similarly, the economic development staff at Waikato District Council have expressed support for the project and have assisted in the site selection process.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

Green Steel is not an infrastructure project but up to 20MW of the electricity required can be generated from the solar farm proposed on the site, the electricity of which will be circulated through the network.

Since structural steel is not manufactured currently in New Zealand, This will be the first project to utilise recycled metal to make steel.

Will the project:

Please explain your answer here:

None of these. However structural steel will be supplied to the construction industry from the plant. It will reduce the cost of construction due to local manufacture and locally recycled scrap.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The project will,

1. Provide around 200 jobs directly and will also provide employment for associated businesses.
2. The site development and construction will also provide a significant number of jobs in the regional economy.
3. The plant will produce 200,000 tonnes of steel per year, saving up to \$320m per annum of foreign currency (less the earnings from exported scrap).
4. Output has the potential to drive down the price of some types of steel in New Zealand.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

To the extent that recycled steel can be considered to be derived from a "natural" mineral resource, then the project will support development of that resource into steel products within New Zealand instead of exporting raw material (scrap) and then re-importing it as steel products.

New Zealand has a very low level of reuse of scrap (generally 0%) compared with worldwide where 30% of global production of steel is from recycled steel.

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

The proposed recycled steel manufacturing project will support climate change mitigation efforts by contributing to the reduction or removal of greenhouse gas emissions for the following reasons:

1. Energy savings: Producing steel from recycled materials typically requires less energy compared to producing steel from raw materials (iron ore). This reduction in energy consumption means there will be lower greenhouse gas emissions, particularly if the energy used in the recycling process comes from renewable sources, and part of the energy requirements for the project are proposed to come from a solar farm to be established on the property.
2. Reduced emissions from mining and transportation: By using recycled steel, the need for mining iron ore is decreased, along with associated emissions from mining operations and transportation of raw materials.
3. Waste Reduction: Recycling steel reduces the amount of waste that would otherwise end up in landfills, which could emit greenhouse gases as they decompose.
4. Carbon Capture Opportunities: Some steel recycling processes can incorporate carbon capture and utilisation technologies, capturing carbon dioxide emissions and potentially even utilising them in other processes or products.
5. Circular economy benefits: Recycling steel promotes a circular economy where materials are reused and repurposed, reducing the need for virgin resources and the associated emissions from extraction and processing.

Overall recycled steel manufacturing is an effective strategy for mitigating climate change by reducing the carbon footprint of steel production and promoting more sustainable industrial practices. This is a major reason why most countries in the world actively encourage recycled steel production.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

The lowest portion of the wider property close to Hampton Downs Road is denoted on the Waikato District Plans maps as being a "Defended Area" which means an area identified on the planning maps which could normally flood in a 1% AEP flood event but is protected from flooding by a flood protection scheme managed by the Waikato Regional Council, the Waikato District Council, or the Crown.

A small part of the area will form part of the development site and will be filled to firstly ensure it is stable but secondly it will mean the area is resilient and above any 1% AEP flood in the event the flood protection scheme failed. That part of the property which contains a small wetland will not be impacted, nor will the land near to it.

Will the project address significant environmental issues?

Not Answered

Please explain your answer here:

See Section 5 of this application for an overview of the potential effects of the project. The conclusion is that we do not envisage there to be any significant environmental issues associated with the project.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

Waikato Regional Council's Waste Prevention Action Plan 2020-2025 has as a guiding principle "the circular economy" - resources are recycled in endless loops. The Green Steel project is entirely consistent with this principle.

Future Proof Waikato and in particular the Hamilton-Auckland Corridor Plan & Implementation Programme 2020 recognises the development pressures in the corridor and the safeguards needed to safely provide for this development. Provision of employment opportunities are recognized as important. The proposed Steel Plant is within an area recognised in this strategic document as providing for growth and development.

Anything else?

Please write your answer here:

The Project will have economic, limited electricity generation and greenhouse gas benefits. The proposed activities will overall have no adverse environmental effects. For these reasons, both the development itself and use of the fast-track legislation promotes the sustainable management of natural and physical resources.

Does the project include an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

The project is not one that will be vulnerable to natural hazards and climate change, comprising no sensitive or vulnerable activities. The site is elevated, away from flooding areas, and the risk of land instability will be mitigated through geotechnically engineered design, with final turbine placements made accordingly.

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

The applicant is a new company, but the main shareholders have been operating National Steel Limited in Wiri since 2011 to recycle scrap steel with the product exported to Asia and India.

In 2019 the company received a sustainability award from Sustainable Business Network for removing 250,000 litres of diesel from the business by relacing 3 diesel excavators/material handlers with electric machines (35 tonne operating weight). Additional electrification initiatives have since been implemented.

In 2013 National Steel attracted a fine from Worksafe due to an incident that occurred relating to work related hazards. There was no injury to any worker in the incident, and, after operating improvements there has been no further such incident.

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Vipan Garg

Important notes