

22 May 2025

National Green Steel Limited
29 Hobill Ave
Wiri 2104

Keryn Bond
Planner
Waikato District Council

Email: Keryn.Bond@waidc.govt.nz

Dear Keryn

RE: ADVICE NOTES FOR FAST TRACK APPROVAL APPLICATION – NATIONAL GREEN STEEL LIMITED

Thank you for your letter dated 30 April 2025 in which a range of Waikato District Council staff have provided advice notes raising issues on the technical reports relevant to your Council that I had previously sent to you.

We have found this to be a very useful process and has led to changes to some of the reports and additional investigations being undertaken in some cases to ensure the application material is complete and to satisfy any issues you have raised.

To ensure our application material when it is submitted to the EPA adequately considers the matters you have raised, we have written out a response to each of your advice notes in this letter. The issues/questions you raised are set out in full and our italicized responses follow – in the same order as set out in the Advice Notes you sent to me on 30 April 2025. So, each question has a response to your question/comments. This letter will be included as one of the attachments in the application material.

Please contact me if you have any further queries.

Advice Notes and National Green Steel responses:

Archaeological

Cattle present throughout the project area restricted access to some paddocks, limiting the test pits and probing. The report should explain what impact this had on the results if any. And whether or not the sites that were tested provide a comprehensive enough sample of the area.

Response: (from Clugh Associates Archeologists)

The majority of the paddocks in the Project Area were accessible and were able to be walked over and tested and this was able to provide a satisfactory understanding of the archaeological potential of the entire Project Area. The test pits that were undertaken showed similar results with a thin layer of topsoil over clay and no evidence of any archaeological features or deposits. As well it was noted that parts of the Project Area that were not accessible had also been previously modified for a runway and horse racing track. As well, based on the desk-based research which indicated low potential for archaeological sites to be present in the Project Area, the survey is considered to provide a sufficient understanding of the archaeological potential of the Project Area.

Noise

The report does not assess/clarify if there are any cumulative noise effects i.e. the steel mill and

motorsport park operating together. This should be addressed even if cumulative effects are negligible.

There seems to be a typo in Sec 4.3.5. as it refers to 'tonal alarms' perhaps it should be 'broadband alarms'?

The assessment has considered noise effects at existing sensitive receivers but are there any properties that are currently vacant and could have dwellings/sensitive receivers constructed on them as permitted activities? If so, perhaps cover this off as it would provide a more comprehensive assessment.

A predicted noise contour plan and table showing worse-case scenario noise levels during operating hours would be useful.

Response: (from Hegley Acoustic Consultants)

Council has made excellent points and the Acoustic report has been amended to accommodate those points as follows:

- *Cumulative noise is now addressed as suggested;*
- *The typo is amended thank you;*
- *Vacant sites have now been assessed as suggested in the amended report;*
- *Done as well A predicted noise contour plan and table showing worse-case scenario noise levels during operating hours would be useful.*

Economics

Table 2.2 maybe compare to average NZ salary over those years?

Box 2.1 why won't the proposal contribute to a reduction in NZ's own emissions as they are currently measured?

Response: (from Castalia, Economic consultants)

We compare to the regional salary (which is somewhat lower than the NZ average) because the report relates to regional economic impact in the context of national economic benefit. The workforce, particularly at the lower skill levels is likely to come from the surrounding area.

Table 2.2:

We assume the Project does not displace any of New Zealand's current steel production (that is, the production mostly at Glenbrook). The Project is adding to New Zealand steel production. The Project will take the scrap metal already collected in New Zealand and process it on-shore (rather than export it). Therefore, it is not reducing any emissions associated with steelmaking or scrap-collection.

Box 2.1:

As set out in the report, the Project reduces emissions overall. The Project produces steel at lower emissions than the typical overseas production processes used to make steel products imported to New Zealand. This is an emissions reduction. The Project also avoids exports of scrap metal, and imports of steel products. Emissions associated with shipping scrap export out of New Zealand and shipping steel product imports into New Zealand are not counted as New Zealand emissions, even though overall (global) emissions from shipping will fall.

Earthworks

Confirm what exactly is happening with unwanted material, will it stay on site or be taken elsewhere? If it is to be taken elsewhere consider traffic movements associated with this.

Section 5 pg 9 Fig 7.2 seems to show 10 catchment areas maybe refer to figure 7.1. instead.

Response: (from Earthtech)

No unwanted or spoil soil material is anticipated to be taken off site. Estimated undercut soil material which is not to be used as engineered fill, is to be used as landscaping embankment fill material – refer Figure 7.1.

The sentence in section 5 correctly refers to the catchment areas shown in Figure 7.2. Catchment areas now number 9, divided into 3 stages, in the revised Earthworks Management Plan Report.

Landscape

Give existing environment a value i.e. minor, low, low-moderate.

Needs a landscape planting plan to demonstrate mitigation (I understand this is still to be completed).

Make sure that figures and appendices are attached with landscape document.

Response: (from Greenwoods, Landscape consultants)

The landscape assessment is conducted on the level of effect on landscape character values (including visual amenity and physical effects on the landscape) of the proposal in its entirety (i.e: the steel works and all associated earthworks) on the existing environment, with the various effects of ratings throughout the report and the conclusion reflecting this. Therefore, in essence, the existing environment acts a 'baseline' of which to assess against and therefore does not require any sort of rating.

The Landscape planting plan (Attachment 25), has been completed by Peers Brown Miller.

The figures and appendices are now attached with landscape document.

Transport

Last paragraph page 10 – there are trip generation thresholds in the ODP – see rule 25.16 (ODP).

What about visitor parking. Will there be enough staff car parking and overflow for visitors? May be just cover this off.

DP assessment – isn't there an alternative access off Hampton Downs Road. Therefore, proposal non-compliant with rule TRPT-R1(a)(v).

Rule TRPT-R3 1a(i) does apply but proposal is compliant.

Is any road treatment recommended i.e. right-hand turning bays, stop or give way signs at entrance? Or is road wide enough and volumes low that this is not required?

Do entrances comply with intersection separation distances and distances from other entrances? And do they meet formation standards? This will need to be covered off in the assessment.

Aerial photos show there is an access track from Hampton Downs Loop Road which traverses sites owned by the applicant as well as other landowners. The access track traverses the subject site before providing access to a dwelling on Lot 1 DP 310030 (61B Hahmptons Down Road). We understand the applicant will use this access track or at least part of it. There is no discussion as to the legal arrangement of this access or any assessment on the users of this access.

Response: (from CKL Transportation consultants)

Note that the Transportation assessment has been updated in accordance with the comments following with the exception of the response in bullet point 6.

- *Pg 10 last para – vpd ODP rule. Noted. Not sure what this comment is referring to as page 10 is in the Parking Assessment section. This comment only makes sense if it refers to page 19 and the issue is our assessment of complete compliance with the ODP rules.*
- *Visitor parking – valid comment. There are 100 staff parking spaces and 100 staff so we have added that, whilst we have assumed for trip generation that everybody will drive, on their own, it's unlikely and the visitor parking can be accommodated in the staff parking areas.*
- *Access – WDC is correct – there is a noncompliance here as both road frontages are now being used for access. We have updated the rules table in relation to TRPT R1 1a(v) and TRPT R3 1a(i)*
- *Road improvements – we can clarify this. The comments about adding stop / give way signs are assuming the accesses are roads not vehicle crossings but given the low cost of such improvements, worth doing.*
- *Form of vehicle crossings – these aspects are covered in the ITA as it stands – see section 5 of the iTA.*
- *Legal agreement of use of access track (ROW). The owner of Green Steel owns most of the ROW leading from Hampton Downs Loop Road that ends at 61B Hampton Downs Road (the property owned by Harness Downs Limited which owns the access road on its own land). Harness Downs Ltd, has rights to use the full length of the ROW owned by Green Steel. They also have rights for water (supply of water) over the entire ROW. This access arrangement will be preserved for full use by Harness Down Limited.*

Hazardous substances

The hazardous substance rules in the OiP are treated as operative so no assessment is required against the equivalent rules in the ODP. Revise rule assessment accordingly.

Response: (from Williamson Water and Land Advisory)

Agreed. The assessment of the rules in the ODP have been removed from the hazardous substances assessment prepared by Williamson Water and Land Advisory.

Geotechnical and Earthworks

The geotechnical report clearly states that the current testing completed on the site is not sufficient and further detailed & deep testing is required to inform the earthworks design which may significantly affect the final volumes in cut & fill. Earthworks design may evolve depending on the findings of further detailed geotechnical testing and even during the works due to variations in soil profile. This may need to be factored in.

Response: (from Earthtech):

Additional investigations comprising 10 (ten) test pits (excavated up to 5.5m depth) were conducted on 23 April 2025. Findings from test pit profiling has provided substantial further information on soil types, characteristics and assessed suitability as cut-to-fill material.

The updated revised Geotechnical Assessment Report (May 2025) includes the additional information.

Further detailed geotechnical investigations (comprising drilling) can be conducted at a later date at detailed design phase to assess founding rock conditions for key structural elements of the Green Steel Project. Geotechnical information obtained to date is sufficient at this stage to provide an understanding of existing ground conditions and earthworks estimates.

Wastewater

The provided report assesses the 'domestic type' wastewater generation and on-site disposal from proposed staff facilities including kitchen and ablution facilities but there is no information or assessment if there will be any industrial/trade waste generated from the activity and if so, how it shall be managed. Any trade waste will require a written agreement with WDC trade waste team.

Note: consents/approvals may be required under Waikato Regional Plan from WRC for on-site disposal of wastewater. These must be obtained to finalize the design for approval.

Response:

We do not envisage significant quantities of trade wastes being generated, but we accept that any such material must be disposed of at an authorised trade waste facility in either the Auckland or Waikato regions. We acknowledge that any such disposal will first need the written agreement from the relevant local authority. This agreement will be sought closer to the time of the project becoming operational which is likely to be a minimum of around 2 years – earthworks, site preparation, final plant design, and building and plant construction must occur first so seeking approval at this stage would be premature.

Regarding the final comment above, as part of this application, consent is applied for discharge of domestic wastewater at an on-site disposal facility.

Water Supply

There are different alternative methods proposed /suggested in the water supply report to meet the overall water demand of the activity including water use for staff as well as industrial processes. This will require to be finalised for the final design of water supply for the activity.

Note: consents/approvals may be required under Waikato Regional Plan from WRC for water take. These must be obtained to finalize the design for approval.

Response:

Consents are being applied through the Fast Track Approval process to take water from the ground and from the large pond to be formed on the site. Technical reports attached to the application deal with these matter as does the AEE.

Your sincerely



Craig Shearer
Project Manager
For National Green Steel Limited