



MANUFACTURERS OF ALL GRADES OF HOT BITUMINOUS MIXES

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allied asphalt

Long-term Plan 2021-31 Amendment
Tauranga City Council
Private Bag 12022
Tauranga 3143

E ngā rangatira, tēnā koutou,

Comments on the Mount to Arataki Spatial Plan

Thank you for the opportunity to make these comments. It is late due to an oversight, but we hope you can still consider our comments.

Allied Asphalt Limited is a joint venture company between Fulton Hogan Limited and Downer New Zealand Limited that owns and operates an asphalt plant on land zoned in the district plan for industrial purposes at Aerodrome Road in Mount Maunganui. An asphalt plant has been in operation on the site since 1970.

Our existing Mount Maunganui site is strategically positioned to allow efficient delivery of raw material inputs, including from the Port, and to efficiently service development projects throughout the western Bay of Plenty.

We are currently in the process of applying for consents to allow us to replace our existing asphalt plant with a new world class plant that will have a range of environmental benefits including reducing contaminant discharges to air, reducing carbon emissions through increased efficiency and alternative fuel capacity, and enabling increased capacity to use recycled asphalt products.

We also propose installing best practice stormwater and trade waste treatment management measures which includes area segregation, diversion of potentially contaminated water to trade waste, and a multistage stormwater treatment train including sediment and gross pollutant trap, oil removal, microfiltration of fine sediment and associated heavy metals, and media absorption of heavy metals in both fine particulate and dissolved form.

We support several of the specific proposals for the Mount Industrial Area that are set out in the Draft Interventions Summary. These include:

- Buffer adjacent to Maunganui Road
- Enhance nature, biodiversity, and amenity in the industrial area
- Improve air quality in Mount Maunganui
- Improve the internal industrial area roading network
- Gateway entrance to mount/industrial areas
- Environmental Accord with businesses in the Industrial Area

Our submission focuses on three of these interventions.



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Enhance nature, biodiversity, and amenity in the industrial area

The enhancement of nature, biodiversity, and amenity in the industrial area is a priority. An urban tree canopy can assist in reducing the creation of heat islands as well as improving ecological and amenity outcomes. However, greater priority should be given to creating an integrated low impact nature-based stormwater system in the industrial area.

The existing stormwater management plan for the Mount Industrial Area relies almost entirely on on-site treatment, and most sites are already substantially developed, often with limited space available for mitigation.

The plan needs a long term vision and strategic approach to the creation of an integrated, ecologically beneficial treatment train. There is an existing opportunity to achieve this for the catchment and water course that traverses the edge of Tauranga Airport, before discharging to Tauranga Harbour. Council ownership offers potential to initiate a naturalisation intervention with few constraints, and to demonstrate early leadership.

Improve air quality in Mount Maunganui

The Mount Maunganui Airshed is polluted, and industrial, port and transportation activities that occur in the area release contaminants to air which need to be reduced where there are opportunities to do so in order to improve overall air quality.

There are options to reduce air emission are available via improved management and new technology. For business to invest significantly in best practice technology, high levels of certainty, including long term consents, are needed to enable an appropriate return on investment. This view contrasts with the community call for 'managed retreat' of industry.

The managed retreat concept emerged in coastal engineering, signifying a shift from the traditional hard protection works legacy for natural hazard management. It applies in circumstances where the risks are high and all other feasible options have been exhausted. This isn't the case for the management of air quality at Mount Maunganui.

There are many feasible options to reduce air emissions to levels that do not cause unacceptable health risks and amenity effects, and these will almost always be more achievable than managed retreat.

Feasibility of retreat is challenging for several practical reasons, besides the "existing use right" limitation identified by the Council, including:

- A lack of available sites for retreat;
- Compliance issues for any site;
- Reduced accessibility and increased travel to remote sites, and associated increase in GHG emissions;
- Time frames and cost of relocation.



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Environmental Accord

We consider that industries that operate in the Mount Industrial Area should recognise the environmental limits of the wider catchment area, including the Te Awanui and the residential area.

All businesses should be applying best practice to the way they operate, which will ensure that cumulative environmental effects are minimised. The strategy to achieve this will require collaboration between Regional and City Council, Hauora a Toi, business, iwi and community stakeholders.

The Environmental Accord, as we currently understand it, has the potential to achieve a step change toward best practice and should be strongly supported and well-resourced by all interests and stakeholders, including business.

While a voluntary/non regulatory approach is ideal, this intervention needs to be backed up by effective regulatory measures, and active monitoring and enforcement should it be required

Nāku noa, nā

Dale Eastham, on behalf of Allied Asphalt

Allied Asphalt Limited

16 October 2023

