

**BEFORE HEARING COMMISSIONERS
IN THE WESTERN BAY OF PLENTY DISTRICT**

UNDER THE Resource Management Act 1991 (“Act”)
IN THE MATTER OF an application for resource consent to authorise four existing industrial activities within part of the Te Puna Business Park structure plan area, for a term of two years
BETWEEN **TINEX GROUP LIMITED**
Applicant
AND **WESTERN BAY OF BAY OF PLENTY DISTRICT COUNCIL**
Consent authority

STATEMENT OF EVIDENCE OF DAVID MCKEAGG

*Before a Hearing Panel: Rob van Voorthuysen (Chair),
James Whetu (Commissioner)*

Introduction

1. My name is David Brian McKeagg.
2. I am the director of Total Relocation Limited.
3. I gave evidence before the Environment Court, and this evidence is similar to that. It is frustrating to have to spend time and energy on these processes. I am here again because this site and our ability to continue to operate there is so important to us.

Total Relocation

4. Total Relocation Limited has a well-established yard at the above address, which is a vital base of operations for our business and encompasses the following:

- (a) a secure location for storage of machinery & equipment including multiple trucks (crane, winch and haulage), utility vehicles, trailers (including large house transporting trailer), excavator, forklift, tools and equipment required for jobs;
 - (b) quality but temporary structures for the safe storage of the above equipment and machinery;
 - (c) yard area for periodic storage of customer buildings/houses before transported to their intended destination;
 - (d) temporary structures which provides staff breakroom so that our staff have a suitable space for meals and rest breaks before and after shifts, secure storage for their personal items while on shift. These shifts are part day but often through the night, as this is the nature of this profession;
5. The company has invested significant resources and time into developing the yard to its present state, including:
- (a) erection of non-permanent structures to provide storage and staff breakroom facilities, including decking and overhead roofing to provide waterproof access and staff working areas between facilities;
 - (b) installation of solar power assets to provide electricity, lighting and security to our site & utilities - estimated cost \$20,000;
 - (c) installation of plumbing assets to bring water from the gate on Te Puna Station Road to our site so water is available as required at kitchen and wash down facilities for staff and equipment - estimated cost \$5,000;
 - (d) preparation of yard surface including compacting of soil with diggers & rollers, plus application of aggregate metal to create yard surface suitable for machinery access and storage - estimated cost: \$10,000;

- (e) installation of gas water flow heater to provide hot water for staff breakroom / kitchen facilities, this is an important part of our companies health and safety policies – estimated cost \$5,000
6. We have established the above facilities at the yard to create an industry specific base for our business operations and to ensure the wellbeing of our staff. Our staff often work at night as building/house relocations can only occur after hours due to traffic management requirements. Our yard provides secure, well lit, waterproof and amendable facilities to ensure a safe working environment for our staff, whose wellbeing before and after a shift is vital. The yard in Te Puna provides sufficient space for us to operate our business at an affordable cost.
7. If the Te Puna Station Road business park was to close and we were required to relocate our yard, the business would face substantial costs which we do not believe can be absorbed. There would be considerable financial and time costs to dismantle the existing yard structures (non-permanent), relocate and re-erect them at a new location. All machinery and equipment would require transportation to the new yard, as would all customer buildings/houses that are stored in our yard at the time. The costs associated with relocating a building/house are significant and could not be passed onto our customers.
8. Relocating the yard to a new location, if we were able to secure an affordable and suitable alternative, would incur costs the business could not afford and we would have to consider ceasing trading as a result. Accordingly, if the Western Bay of Plenty District Council were to refuse this consent, then there would be a significant impact to the ongoing viability of the company. If losing the yard forced the closure of our business, we would have no choice but to terminate our four current employees. We value our employees greatly and having to terminate their employment would be a very difficult and sad decision.

Personal implications

9. I have put substantial time and effort into building and maintaining this business and would be deeply saddened if I was forced to cease trading. Not

only for my own livelihood and wellbeing and that of my staff, but also for my children.

10. I am sorry to say that in the past few years I have suffered significant personal trauma after losing two children to suicide. This has had a significant impact on my marriage and other children. During this time, I have worked hard to maintain this business while supporting my family through such an extremely difficult time. My other children faced many difficulties with the loss of their siblings, and I am so grateful to have been able to provide two of my remaining children with employment in the business, so I could provide them with security, support and guidance for the future.
11. Losing the business that I have worked so hard for, throughout extremely difficult personal situations, would be extremely difficult for me and my family. Having this decision brought about by a council decision would be even more difficult. The council should be here to support business, not tear us down.
12. I hope that the Panel will take the above into consideration when considering the consent application.

Noise management plan, and Clarke Road

13. I confirm that I have seen the latest version of the Noise Management Plan, and that I am confident that we can meet it.
14. I also confirm that we are confident that we can ensure that heavy vehicles accessing our site will not use Clarke Road. We move buildings to our site ourselves, and so have ultimate control over these activities.

6 October 2023

David Brian McKeagg