

**BEFORE A BOARD OF INQUIRY
EAST WEST LINK PROJECT**

UNDER

Resource Management Act 1991

AND

IN THE MATTER

Notices of requirement for designations and resource consent applications by the New Zealand Transport Agency for the East West Link Project.

**EXPERT EVIDENCE OF JOHN LATIMER ON BEHALF OF T&G GLOBAL
LIMITED**

INDUSTRIAL ARCHITECTURE

22 MAY 2017

**Russell
McAugh**

B S Carruthers / S H Pilkinton
P +64 9 367 8000
F +64 9 367 8163
PO Box 8
DX CX10085
Auckland

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1. INTRODUCTION

- 1.1 My full name is John Latimer. I am managing director of Code Design Ltd, an industrial and commercial architectural design company based in Auckland.

Experience and qualifications

- 1.2 I am a New Zealand Licensed Building Practitioner with Design-3 registration.
- 1.3 I have 54 years' architectural and engineering design experience and have operated my own industrial and commercial design company for the past 44 years.
- 1.4 My multi-disciplinary architectural design and development experience encompasses a broad design portfolio including traditional and modern design projects of various sizes and covering the following design fields:
- (a) Industrial warehousing and factories, commercial retail developments and offices.
 - (b) High-quality homes and multi-level, multi-residential apartments.
 - (c) Holiday homes and beach houses.
 - (d) Early childhood educational and day-care facilities.
 - (e) Retirement villages, rest homes, private hospital geriatric care institutions and hospice and respite care facilities.
- 1.5 The scope of my involvement in these projects ranges from providing concept design advice to assistance with full construction documentation and project monitoring. Specifically, my work includes:
- (a) Bulk and location master planning and project feasibility concept studies.
 - (b) General draughting services.
 - (c) Preliminary design and analysis.

- (d) Construction design and documentation.
- (e) Lead design consultant for coordination of other services including fire, mechanical, structural, civil, land and building survey, planning, electrical, hydraulic, acoustic, traffic, geotechnical, arborist and landscape design.
- (f) Assistance with tendering documentation and tender review and contract negotiation.
- (g) Site observation and building contract administration.

1.6 Specific to T&G Global Ltd's ("**T&G**") Mount Wellington site at 1 Clemow Drive and 2, 4 and 6 Monahan Road ("**Site**"), I have considerable knowledge and professional experience relating to the Site's recent optimisation programme undertaken in 2014. I further explain my role in this programme in section 3 of my evidence.

2. **CODE OF CONDUCT**

2.1 I confirm I have read the Code of Conduct for Expert Witnesses 2014 contained in the Environment Court Practice Note and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state I am relying on what I have been told by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

3. **SCOPE OF EVIDENCE**

3.1 This statement of evidence addresses the effects of the New Zealand Transport Agency's ("**Transport Agency**") East West Link ("**Project**") on T&G and the operation of its Site. In particular, relevant to my expertise, my statement:

- (a) summarises the existing site and operations and details my role in the major 2014 redevelopment;

- (b) addresses the adverse effects of the construction and operation of the Project on operations at the T&G Site;
- (c) details the constraints of relocating demolished operations on the remainder of the Site not affected by the Project works (including the necessary relocations of Transpower's assets); and
- (d) responds to NZTA's design and construction evidence in relation to the effects of the Project on the Site.

3.2 In preparing my evidence, I have read the evidence on behalf of the Transport Agency provided by Mr Nancekivell regarding the Project's design and construction. I have also read the corporate evidence on behalf of T&G by Mr Keaney and the expert traffic evidence of Mr Hall.

4. EXISTING SITE AND REDEVELOPMENT

4.1 A description of the existing facilities and operations at the Site is provided in the statement of evidence of Mr Keaney. I do not repeat that evidence here in full.

4.2 In summary, the Site includes a fresh produce market for T&G's Auckland customers, a fruit fumigation and ripening plant for imported produce, a bin and crate washing facility operated by a third party, and various customer, office and parking facilities necessary to support these key operations. The Site operates on a heavily integrated basis to ensure the efficient operation of all the facilities and activities undertaken on-site, in a manner that provides ease of use and access for T&G's growers, purchasers and employees.

4.3 The current Site area is nominally 56,950m². Site coverage at the Site consists of the:

- (a) existing building and covered loading areas (22,400m²); and

- (b) yard space for container grids, bin and crate storage for the Viscount¹ bin and crate washing facility, a MPI container yard, truck parking, delivery to and dispatch from the produce market floor and customer/staff parking (20,700m²).
- 4.4 This represents approximately 75% site area coverage, with the remaining site used for truck manoeuvring and some site landscaping to the property road boundaries (which I understand are likely to be requirements of T&G's various resource consents for the Site).
- 4.5 The Site was subject to a major redevelopment and reconfiguration in 2014. The objectives for the redevelopment and key changes made to the Site are detailed in Mr Keaney's evidence. My role was to provide expert architectural advice to optimise operations at the Site, by redesigning locations for key facilities, providing for revised operating procedures within key operations and designing the associated produce delivery, storage and sales dispatch areas of the Site.
- 4.6 My work on the redevelopment also involved the relocation of the Viscount bin and crate washing facility from rented premises at 7-8 Monahan Road to the Site, which included:
 - (a) Alteration of the existing large span building to accommodate installation of the new facility, including foundations, boiler unit, and additional water and power supply. There is little if any flexibility as to the internal layout of this building, given the linear nature and 28 metre length of the bin and crate washing machine, which is contained within a 42.5 metre long facility. The remaining space in the facility is required for fork hoist access and truck access. In short, the required length for the building is driven by the set length of the washing machine itself and associated access requirements.
 - (b) Design and installation of a specific in-ground wastewater treatment plant to capture the contaminated rinse water.

¹ I understand that the facility is operated by Viscount FCC Limited, an indirect subsidiary of the Australian listed entity, Pact Group Holdings Limited trading as Viscount, which leases the building from T&G.

- (c) Design of site layout for adjacent stacking areas for clean bins and crates in a convenient location for T&G's customers. This led to the demolition of approximately 70% of the old flower market building to provide a large outside storage compound, and extensive reconstruction of what is now the Fruit World building (being the remaining 30% of the original building).
- (d) Design of site layouts for heavy vehicle access to the new inward goods (bins and crates) loading bay. Given the linear nature of the Viscount bin and crate washing facility, the inward goods are delivered to the rear of the building. Vehicle movements in relation to the facility were also factored in to the decision to substantially demolish the old flower market building.

4.7 My work on the redevelopment also involved:

- (a) Reconfigured access to the fruit fumigation and ripening plant inward goods loading bay to align with the new access for the Viscount bin and crate washing facility.
- (b) Design of additional cool room storage within the fruit fumigation and ripening plant. This used the last remaining space in that building, removing opportunities to downsize the building without impacting on its function.
- (c) Optimisation of the available office space in the fruit fumigation and ripening plant.
- (d) Within the produce market building, major internal alteration of cool room layouts, internal traffic corridors and the demolition of three 60-metre long covered load bay fingers.
- (e) Creation of a vehicle slip ramp for semi-trailer vehicles exiting or bypassing the covered loading bay tunnel to the north of the produce market building.
- (f) Construction of a new dispatch load bay platform to the north of the produce market building, for improved traffic flow and increased produce dispatch.

- (g) Reconfiguration of vehicle manoeuvring areas and separation of commercial vehicle parking from staff, customer and visitor car parking (this was undertaken in conjunction with Mr Hall).
- (h) Design of the vehicle access and MPI storage yard grid facilities for imported produce delivered to the Site in refrigerated fruit shipping containers.
- (i) Reconstruction of offices and facilities within the remainder of the old flower market building that was not demolished, for use by a major T&G customer, Fruit World.
- (j) Relocation of T&G's transport division facilities and on site semi-trailer parking for T&G's transport fleet to locate them adjacent to the produce market building.

4.8 In my opinion, the redevelopment and reconfiguration of the Site in 2014 resulted in a site that was fully optimised for the operations that are undertaken, while allowing the strict MPI requirements that apply to the Site's operations to be met in an efficient and effective manner.

4.9 I was also involved in the further minor works that followed the 2014 redevelopment, including:

- (a) Relocation of the T&G IT division offices from rented property at 7-8 Monahan Road to the new offices within the eastern side of the produce market building.
- (b) The upgrade and fit-out of further offices within the produce market building to provide for T&G's finance division, as well as a new café and relocated reception for customers and staff.

4.10 In summary, I have been involved with the efficiency and optimisation of the site since 2014 and believe the Site is already fully optimised.

5. ADVERSE EFFECTS OF THE PROJECT

5.1 The notice of requirement for the Project covers the whole of the Viscount bin and crate washing facility, fruit fumigation and ripening plant and the Fruit World offices. I understand that the physical extent

of the Project once constructed (including the permanent implications of the relocated Transpower line) will approximately reduce:

- (a) the fruit fumigation and ripening plant and container storage by 50% of its existing facility;
- (b) the Viscount bin and crate washing facility by 30% and associated storage compound by over 50%; and
- (c) the Fruit World office by 50%.

5.2 The Transport Agency's latest land requirement plan attached to the evidence of Mr Keaney show that all three of these facilities will be required for "temporary occupation" purposes during the construction of the Project. It is not clear at this stage what is entailed by "temporary occupation". However, in my opinion, even if T&G was able to continue to use those parts of these facilities that are not directly affected by the extent of the Transport Agency's actual physical works, there is no way these remaining parts of the facilities can be reconfigured or repurposed to remain partially operative in any significant or meaningful way. This is due to the highly integrated nature of these facilities and their specific requirements in terms of access, yard space and (in the case of the fruit fumigation and ripening plant) MPI requirements, which I have explained above.

5.3 Because of the substantial extent of the buildings and associated access/yard areas required for the Transport Agency's physical works and the effects this will have on the integrated components of each facility listed above, I consider the Viscount bin and crate washing facility, fruit fumigation and ripening plant and the office space leased to Fruit World will all need to be demolished.

5.4 There is no ability to extend these facilities further in to the Site to enable them to be re-purposed or reconfigured in a useful way. Quite apart from the effects this would have on operations of the remainder of the Site (that are not directly affected by the Project), this is because of the requirement to temporarily relocate Transpower's HEN-OIA-A (220hr) line and the restrictions this places on activities below.

- 5.5 The temporary Transpower transmission lines will also be located directly over the eastern half of the Group Head Office. I understand that the Transpower easements that will need to be put in place to establish the transmission lines require that no buildings be allowed underneath the lines. This means the Group Head Office will also need to be demolished.

6. RELOCATION OF OPERATIONS

- 6.1 As discussed above, following the significant works to reconfigure the Site in 2014, the Site is fully optimised for the current T&G operations.
- 6.2 I have considered the potential options for relocating the fruit fumigation and ripening plant, Viscount bin and crate washing facility, the Fruit World offices, and Group Head Office on the remainder of the Site that will not be required for the Project.
- 6.3 In short, there are a number of significant constraints that mean the relocation of any of these facilities is impractical. I do not detail all of these constraints here, but most significantly they include the following:
- (a) Any relocation will require the utilisation of space currently used by other essential activities. For example, the relocation of the Viscount bin and crate washing facility would occupy the space currently used for the storage of clean bins and crates. However, this is a critical component of that operation that would then need to also be replicated elsewhere in immediate proximity, and there are no options to do so. The two components of the facility are both essential.
 - (b) The relocation of the fruit fumigation and ripening plant would face similar practical obstacles, in that it would occupy space already fully utilised for other onsite storage and yard purposes – with nowhere for that other activity to relocate to.
 - (c) As set out above, the length of the bin and crate washing machine is 28 metres, which dictates the dimensions of the building that is required to house that machine. A building of at least the current size of the Viscount bin and crate washing

facility would be required if that facility was relocated. There is simply no space for a building of that size on the remainder of the Site, without relocating some other activities off-site.

7. NZTA'S EVIDENCE ON DESIGN AND CONSTRUCTION

7.1 While Mr Nancekivell's design and construction evidence on behalf of the Transport Agency does refer to the Site, in my opinion he does not adequately consider:

- (a) The functionality of the existing Site layout;
- (b) The actual effects of the Project on the Site; or
- (c) The options (or lack of) for relocating buildings on the remainder of the Site without displacing other essential activities.

8. CONCLUSION

As explained above, the existing Site is fully optimised for its current operations. However, the Project (including the relocation of Transpower's assets) will require the demolition of those facilities directly affected by the Project. Given the Site's existing optimisation and the other significant constraints, there is no ability to attempt to mitigate these adverse effects by relocating these facilities on the remainder of the Site.



John Latimer
22 May 2017