

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

UNDER

the Resource Management Act 1991 (the
RMA)

AND

IN THE MATTER OF

notices of requirement for designation
and resource consent applications by
the New Zealand Transport Agency
for the East West Link Project

**STATEMENT OF EVIDENCE OF PETER JOHN WARD ON BEHALF OF
WARD DEMOLITION LIMITED**

Dated: 22 May 2017

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I, Peter John Ward, company director, of Auckland, state:

INTRODUCTION AND EXPERIENCE

1. My name is Peter John Ward. I am the founder and Managing Director of Ward Demolition Limited (**Ward**). I have over thirty years' experience in the demolition and recycling industry.
2. Ward is now one of the largest demolition and recycling companies in the Auckland region, operating a contracting fleet that includes 56 excavators, 22 large trucks, 4 jaw crushers, screening plant and 4 pay loaders. Ward employs over 100 staff and has the capability to deliver projects of every size and complexity in all aspects of demolition, salvage and resource recovery, across the commercial, industrial and residential sectors, including machinery hire, resource recovery, recycling and salvage.
3. As part of its operation, Ward undertakes demolition and concrete recycling activities that play an important role in enabling the rapid rate of development in the Auckland Region (for example, Ward is involved in two of central Auckland's largest projects: the Downtown Centre and the New Zealand International Convention Centre).
4. I am the current president of the New Zealand Demolition & Asbestos Association (NZDAA), and participate in national and international events annually. I have spoken to a variety of organisations, engineering firms, and industry associations. I regularly attend the Aggregate and Quarry Association of New Zealand, as well as the American Demolition Conference, and a variety of waste minimisation conferences worldwide. In 2012, I was an invited speaker at the American Demolition conference in Las Vegas to discuss my Christchurch demolition experiences following the Christchurch earthquakes.

5. My specific experience relevant to my evidence is that I have been in the demolition and recycling industry for over 30 years and am familiar with the day to day operations of running Ward, and the intricacies of establishing and running Ward's concrete recycling business and the overall concrete recycling business in the Auckland region. Ward is aligned with the Green Building Council of New Zealand and as Managing Director of Ward, I have first-hand knowledge of how demolition, recycling and the use of recycled materials can contribute points towards a Green Star NZ rating. We have participated and completed a large number of Green Star projects. Under my direction, some of Ward's projects have reached recycling targets of up to 96% of salvaged material by weight, and have accomplished this by integrating the capabilities of Ward's many specialist units.
6. The main focus of my evidence is the significant adverse impact that the East West Link Project (the **Proposed Works**), involving the acquisition of land on which Ward's recycling business premises is situated (at 13-17 Miami Parade, Onehunga), will have on Ward's business, and specifically the adverse impact that a land take would have on both Ward and development projects in the Auckland region. Where relevant, my evidence also addresses other potential effects of the Proposed Works.
7. Ward is not opposed to the Proposed Works, but is opposed to any take of the land used for its site/premises, as this would have a significant adverse impact on its business and operations.
8. The Designation Plans for the Project reveal that the "Project footprint" covers a substantial portion of Ward's premises ("Required Area"), bisects the premises, and the designation and/or acquisition of the Required Area would cause substantial disruption effects to Ward's core activities to the point where in my opinion, continued operations would not remain viable within the remaining land. The extent of disruption would not only be significant and endure beyond the full construction phase of the Proposed Works, but I am not aware of any

suitably located and zoned alternative sites to which Ward's activities could be relocated. The disruption effect in my opinion is therefore both absolute and permanent.

9. I invite the Board pursuant to hearing procedure 6.4 of the Environment Court's Practice Note 2014 to visit the site at 13-17 Miami Parade to see first-hand how the Proposed Works will impact Ward's business.

CODE OF CONDUCT

10. My qualifications as an expert and fact witness are set out above. I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2014. I have complied with the Code of Conduct in preparing this evidence. Except where I state that I am relying on the evidence of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

11. My evidence should be read in conjunction with the evidence of the other Ward witnesses listed below. I defer to their expertise where necessary and relevant:

- 11.1. Ms Magdalena Dimitrova (financial impact on Ward);
- 11.2. Mr David Macpherson (planning); and
- 11.3. Mr Bryce Marx (project management).

BACKGROUND TO WARD'S CONCRETE RECYCLING BUSINESS

12. I provide below a brief description of Ward Demolition's business.
13. I founded Ward in 1987 as a family-run business. It is now one of the largest demolition and recycling companies in the Auckland region, employing over 100 staff, many of whom live in the South Auckland

region where we are located, and whose jobs and families would be directly impacted by any cessation or interruption of activities.

14. Ward's Miami Parade site has been adapted for specialist industrial concrete recycling. Concrete is brought onto site from various demolition projects around the Auckland region. After the processing, downsizing and extraction of a high percentage of reo bar, the concrete is crushed and recycled to a different size aggregate (20mm, 40mm and 65mm) for use in roading projects, car parks and civil projects.
15. Almost half of Ward's staff work out of the Miami Parade site, and its machinery is housed there when not in active use. The location of the site is ideally suited for the receipt of concrete waste from the demolition activities and from the public around the Auckland region.
16. With the rapid rate of development in the region to cater for strong population growth, Ward plays an important enabling role in the development process. The raw and recycled tonnage of concrete processed for 2017 financial year is in excess of 154,000 tonnes. (This is roughly the equivalent of two aircraft carriers.) This was managed by Ward, which works actively to reduce the waste stream of demolition projects (and which has achieved recycling targets of up to 96% of salvaged material by weight). (See Appendix Images 3-5.)

Concrete received and recycled at Ward Demolition Site	FY 2016			FY 2017		
	Tonnage	Truck movement based on Artic (18 tons)	Truck movement based on 6 Wheeler (10 tons)	Tonnage	Truck movement based on Artic (18 tons)	Truck movement based on 6 Wheeler (10 tons)
Received concrete for processing	66,245	7,361	13,249	74,395	8,266	14,879
Recycled concrete	64,918	7,213	12,984	79,762	8,862	15,952
Total:	131,162	14,574	26,232	154,157	17,129	30,831

17. The company is continuing to grow and this reflects the increase in concrete recycling. Currently, Ward is involved in two of central Auckland's largest projects: the Downtown Centre (demolished for the

Auckland City Rail Link project) and the New Zealand International Convention Centre.

BUSINESS IMPACT OF PROPOSED LAND TAKE

18. Based upon my experience, the Proposed Works (including provision for a new four-lane highway and other facilities) in my opinion would result in a significant reduction to the Miami Parade site, such that the balance of the land left over would not be large enough to make the present business operations viable. (See Appendix Images 1-2.) Ward would be faced with either closing down the business, or attempting to relocate.
19. Cessation of the business either permanently or temporarily (while the necessary resource management and other consents are sought) would have a deleterious effect on the financial position of Ward, and likely result in a significant business interruption claim.
20. Further, cessation of the business either permanently or temporarily, for the reasons already mentioned, would have a deleterious effect on development projects for a wide range of land uses necessary to meet demand caused by the strong growth of the Auckland region. This is by putting a halt to the development process at the point of obtaining cleared sites to enable projects to start on time.
21. In my opinion, if Ward were to cease operations at its present location, it would increase the cost of development throughout the Auckland region and would dramatically affect the rate of concrete recycling. I have seen my business increase as development in the Auckland region has increased, and the projections for development within the city are only set to increase with a parallel need for recycled concrete.
22. The New Zealand government through the Crown Building Project recently announced the building of 34,000 new homes in the Auckland area over the next decade. The Crown Building Project requires the

removal of 8,300 old run-down houses in Auckland. It is essential that there is a cost-effective solution for both the removal and construction of new homes. Ward is working with Housing New Zealand in the demolition and recycling involved in this major public works initiative.

23. For proposed high density development in the city, in my opinion it is crucial to have an urban quarry which minimizes freighting costs and makes recycling of materials essential to conducting business and second nature. For much of the high density construction in the CBD and surrounding suburbs, where a home is demolished for a higher density build, there is usually a concrete slab and driveway which is to be recycled. We often have trucks coming to Ward full of materials to recycle, and leaving with recycled materials to use. There is no guarantee that such a situation would continue if Ward were to cease operations.
24. I am aware based on Ward's position in demolition and concrete recycling that there are limited sites within Auckland for tipping and a greater limitation on sites for steel extraction. Without the functioning Miami Parade site, it is highly likely that development projects would be delayed and salvage recycling would reduce.
25. Even assuming Ward could find another suitable site in a timely manner, its operations involve a high level of nuisance effects, particularly in terms of noise, dust and vibration, including ingress and egress by heavy transport taking demolition materials to the site, and removing the process of materials from the site. It will take considerable time, effort and expense to engage appropriate consultants and to prepare for heavy industrial use.
26. Further, if, as seems likely, a suitable site in the city area cannot be found, Ward may need to relocate out of the city – most likely to a site south of Pukekohe. Truck movements on the Southern Motorway will significantly increase if this occurs (in excess of 31,000 loads/154,000

tonnes per annum), with a resulting adverse impact on traffic flows, roading and the environment.

27. Cessation of the business permanently would have adverse environmental consequences. Several international studies have shown that creating a secondary use for concrete has a number of significant environmental advantages:¹

27.1. Crushed (recycled) concrete enables the capturing of carbon dioxide: it is well documented that the amount of CO₂ uptake from recycled crushed concrete is approximately 11 kilograms per ton of concrete recycled.

27.2. The re-use of crushed concrete as hard-fill reduces the drain on the extraction of raw materials/aggregates from quarries.

28. The location of Ward's operation reduces transport distances when crushed aggregate is used to support infrastructure and building expansion with Auckland City and the wider region.

Dated 22 May 2017

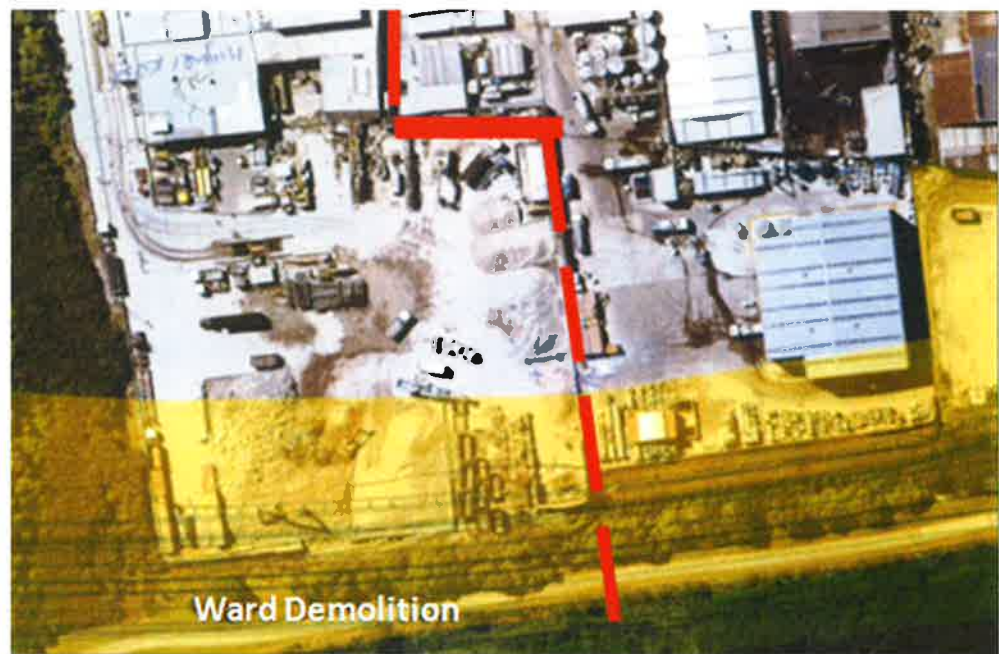


Peter John Ward

¹ See, for example, Kikuchi, T and Kuroda, T, "Carbon Dioxide Uptake in Demolished and Crushed Concrete", *J Adv Concr Technol* 9 (2011), 115-124; Pidwerbesky, B, "Recycled Crushed Concrete in Pavements", *IPENZ Seminar*, June 2015.

APPENDIX

Image 1



The impact of the Proposed Works on Ward's site

Image 2



Image 3

Eden Park 2008



91%



8,332 ton recycled

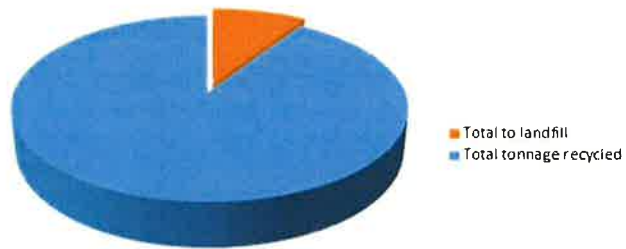


Image 4

Downtown Centre (Commercial Bay) 2016



87%



20,509 ton recycled

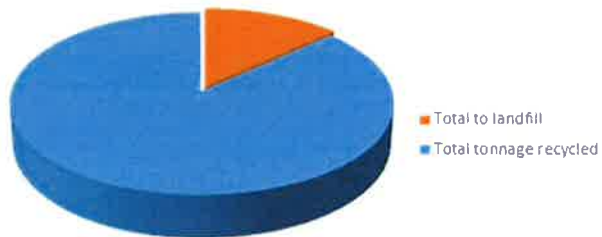


Image 5

NZ Convention Centre 2016



81%



23,253 ton recycled

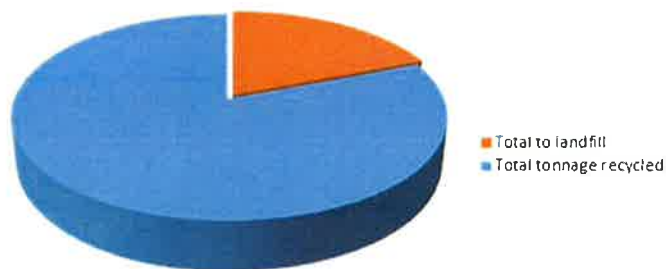


Image 6

