

**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.

**HEARING SUMMARY OF JOHN LATIMER ON BEHALF OF T&G
GLOBAL LIMITED**

INDUSTRIAL ARCHITECTURE

DATED 21 AUGUST 2017

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1. HEARING SUMMARY

- 1.1 I have over 54 years' architectural and engineering design experience.
- 1.2 I was heavily involved in the redevelopment and reconfiguration of the T&G Site ("**Site**") in 2014 that led to its current level of optimisation. These works included;
- (a) relocation of the bin and crate washing building on to the Site (involving major building reconfigurations, the design and installation of a bespoke in-ground wastewater capture and treatment facility, a stacking area for clean bins and design layout reconfiguration for heavy vehicle access and operation);
 - (b) reconfigured access to the fruit fumigation and ripening plant;
 - (c) significant office and administrative space optimisation;
 - (d) construction of a new dispatch load bay and slip ramp to the north of the produce market building to improve Site circulation and safety; and
 - (e) major internal optimisation works within both the fruit fumigation and ripening and produce market buildings.
- 1.3 I remain of the view set out in my primary evidence: operations and land use at the Site are fully optimised. The Site today operates on a fully-integrated basis to ensure the efficient operation of all the facilities located at, and the activities undertaken on, the Site, in a manner that provides ease of use and access for T&G's growers, purchasers and employees. Therefore, **any** reconfiguration of the Site required as a result of a reduction of the Site's land area will not support the current level of operations or deliver the same level of efficiencies to T&G.
- 1.4 The designation boundaries for the East West Link ("**Project**") (as shown in the Transport Agency's plans tabled at the commencement of the hearing)¹ continue to cover the whole of the bin and crate washing

¹ New Zealand Transport Agency Road Alignment Plan SH1 / Sylvia Park Ramps Sheet 10 – Drawing number AEE-AL-110, 27 June 2017.

facility, the fruit fumigation and ripening plant, and the Fruit World offices. I understand that only part of this area is required for the Project's construction and operation. Nevertheless, even if T&G was able to continue to use those parts of these facilities that will not directly be affected by the extent of the Transport Agency's actual physical works, the remaining parts of these facilities cannot 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) requirements of the Ministry for Primary Industries. The relevant parts of these operations are explained fully in the primary evidence of Mr Keaney and myself.

1.5 I consider the Site's current optimisation, and consequent reconfiguration constraints, are such that any reduction in the Site's useable area associated with the Project would require some of the operations currently undertaken on the Site to be relocated elsewhere. These constraints include:

- (a) that relocation of any one facility or use requires the utilisation of space currently used by other activities;
- (b) that many of the Site's activities are interdependent such that if certain operations are moved (or relocated) others must also follow. Mr Keaney will talk to the interdependence of other operations (and consequent relocation constraints) when he appears before the Board.
- (c) the nature and size of machinery in use, and its related infrastructure. For example, the bin and crate washing machine is 28 metres in length and includes a large boiler unit, significant foundations, and a separate water and power supply system. It cannot simply be pushed forward to accommodate a reduced area to the rear of the facility, or be located elsewhere on Site without significantly affecting other operations.

1.6 Consequently, I consider that any reconfiguration which sought to maintain all existing operations on the Site would impose considerable

and unworkable inefficiencies on T&G from an architectural and industrial design perspective.

- 1.7 Because of this, my opinion is that the Site reconfiguration proposed in the rebuttal evidence of Mr David Baird (the "**Babbage Plan**") cannot be constructed without major disruption to the Site's operations, and that, if carried out, it would not support the current level of operations or efficiencies on Site. I understand that, since his evidence was filed, Mr Baird has acknowledged that the Babbage Plan was a "concept design" or "discussion document" prepared without direct consultation with T&G,² and was merely a starting point, with further work required.³
- 1.8 In my significant experience with the planning, design and construction phases of reconfiguring the Site, it takes a high degree of understanding as to the operation of the Site's specific facilities, and how these operate and interact with one another, before a major reconfiguration of the Site can even be contemplated, let alone appropriately managed in terms of construction and staging.
- 1.9 I myself met with Mr Baird to discuss the Babbage Plan and alternative Site reconfiguration and / or relocation options on 25 July 2017, along with Mr Keaney and Mr Kelly (T&G's National Property Manager). While this meeting was helpful, it does not change the views set out in my evidence and summarised above.
- 1.10 To conclude, I consider that T&G cannot achieve anywhere near its current level of efficiency through a reconfiguration of the current Site, if the useable area of the Site is reduced as sought by the Transport Agency. In my opinion, the effects of a reduction in the area of the Site will force the existing facilities that are significantly impacted by the Project's construction and operation (namely the fruit fumigation and ripening plant, and the bin and crate washing facility) to be relocated elsewhere.



John Latimer
21 August 2017

² Hearing Summary – David Garrick Baird. 20 July 2017, at 6 and 10.

³ Transcript of Hearing Proceedings – Cross examination of David Baird, p 2043.