

Evidence summary - Goldsworthy

1. INTRODUCTION

- 1.1 In my evidence I provided an executive summary and conclusions which I propose to take you through. Following that I would like to briefly address the responses made to Downer New Zealand's (or Green Vision Recycling's) suggested alternatives to the proposed Port Link Road, particularly as there have been several agreements affecting this area since the time that I filed my evidence.

2. EXECUTIVE SUMMARY AND CONCLUSIONS

- 2.1 At the outset I note that while Downer New Zealand supports the project in principle, its concerns are directly related to the impact of the project on its operations, the break-up of its site, and the resulting inability to service the construction and recycling needs of businesses in the Auckland region. Most of the company's concerns arise from the Port Link Access Road, and the indicated land take on the southern boundary of the lease.
- 2.2 In dissecting the business's site with the proposed Port Link Road and in taking the site's land both permanently and temporarily, the Proposal will result in the closure of the Green Vision Recycling business.
- 2.3 In 2014 company management commissioned a robust review of alternative sites by Colliers New Zealand, an independent third party that has significant experience in appraising the availability of commercial property in the greater Auckland area. The detailed review concluded that there is no other suitable site for the business's relocation in the Auckland Region meaning that if the Proposal proceeds with the Port Link Road in its current location, there will no longer be access to a waste minimisation facility that has the distinct product offering of this nature in the Auckland isthmus.
- 2.4 In attempting to achieve the objectives of the East West Link of moving people and growing businesses, the Proposal will

inadvertently compromise many existing businesses, including Green Vision Recycling, with associated economic and environmental effects. These include:

- (a) environmental effects associated with reduced opportunities for waste minimisation;
- (b) increased haulage costs for hard construction materials; and
- (c) economic effects associated with the closure of the business and a reduction of scarce heavy industrial zoned land.

2.5 If the Proposal proceeds, to ensure the continued viability of its business, Green Vision Recycling has proposed two alternatives for the relocation of the Port Link Road.

2.6 The relocation of the Port Link Road would potentially eliminate the need for both the temporary and permanent take of the Green Vision land, as a result avoiding the need to close the company's operations. Although some land would potentially still need to be taken from the south of the site for construction of the corridor, in all likelihood the resulting reduction of the size of the site could be accommodated by the business. This is because of the location of the southern strip of corridor land in relation to the remainder of the site. In this regard I understand that there is a potential alteration to the designation arising from the Expert Conferencing with the neighbouring land owner, EnviroWaste, that will further reduce the impact of the southern strip of corridor land. This is an outcome that Green Vision Recycling would support.

2.7 With agreements having been reached with other parties through the hearings process, in my view, these options now appear to be even more viable and require more detailed consideration if the adverse effects on the Green Vision Recycling business and the wider community through the loss of this recycling business are to be avoided or mitigated.

3. ALTERNATIVE OPTIONS

3.1 In my evidence I proposed two alternative options:

- (a) Alternative A – move the Port Link road further to the east to minimise the take of heavy industrial land required for the project as shown on Figure 4. This alternative would take advantage of an existing road that currently allows access to the Heliport and would greatly reduce the land required for the EWL proposal.
- (b) Alternative B – make use of the currently proposed access to the Heliport if it is moved to the eastern end of the site. The elevated roadway that is proposed through this section would allow an interchange to be constructed.

Figure 4 – Alternatives to proposed Port Link road



3.2 **Alternative A:** In her rebuttal evidence Ms Linzey says that “neither of the alternatives proposed ... will enable this local road connection for existing businesses.”

3.3 I disagree with this statement as the current private road owned by Ports of Auckland Limited (“POAL”) that runs west to east and extends from the end of Miami Parade to service the Car Distribution Group and the Heliport will still be functional if the Port Link access road is moved to the eastern side of our current lease property (my

Alternative A). This will continue to provide the local road connection for existing businesses.

- 3.4 Ms Linzey also states that the existence of the existing road purposes designation clearly indicates a planning expectation of a road in this location while acknowledging this does not negate the need to consider alternatives¹ and that “the relocation options do not eliminate adverse effects on major land holdings but shift these effects to different landowners”.
- 3.5 In response I note that the land purchase from POAL, which NZTA have indicated is “advanced”, will now result in NZTA ownership of the portion of private road extending from the end of Miami Parade to the Car Distribution Group land. This will enable the land to be designated if necessary and will also allow alternative access to Neilson Street via Miami Parade for traffic that wants to avoid Captain Springs Road. Ownership of the POAL land by NZTA should mean that there is no issue about “shifting the effects to other landowners”.
- 3.6 I do not understand why Mr Nancekivell discounts my Alternative A on the basis that it provides no connection to Miami Parade, as Miami Parade is easily extended and query whether his opposition on the basis that my alternative severs another property still stands in light of the negotiations with POAL.²
- 3.7 **Alternative B:** Since my evidence was filed on 24 July 2017 Counsel for Auckland Heliport Limited Partnership have filed a joint memorandum advising that NZTA has agreed to relocate the heliport further to the East and to a position to the south of the Corridor. This makes my proposed Alternative B more viable, as it was already based on the relocation of the Heliport to its proposed position. [Refer to Appendix A of the joint memorandum of Counsel dated 18 July 2017.] The map in that appendix shows access and egress from the site but this could be extended to include access to the Metroport as indicated in my Figure 4 above.

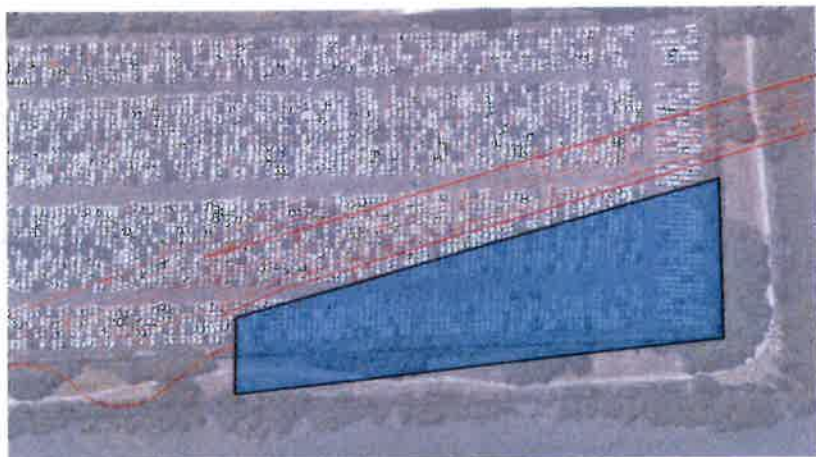
¹ Linzey Rebuttal Alternatives at Para 6.1

² Nancekivell Rebuttal Design Construction at para 7.7

- 3.8 As with Alternative A, the land affected by the proposed new Link Road as shown in Alternative B will cut through land that NZTA proposes to purchase from POAL. One of the advantages of this Alternative is that Miami Parade does not become a thorough-fare for traffic to Nielson Street as it is not a road that has been designed for this purpose or the likely level of future traffic.
- 3.9 In terms of the ecological concerns expressed, the proposed location of Alternative B builds off the agreed proposal with the Heliport Company and utilises land currently used by POAL. It does not appear to encroach into the identified Significant Ecological area (as shown on the map below) in a manner than is significantly more material than the existing corridor proposal, as the additional access to the Metroport could build off the proposed access to the Heliport area.



- 3.10 The map below shows the proposed relocation of the Heliport area.



4. ECONOMIC IMPACT RESPONSE

- 4.1 The evidence of Ms Linzey refers to the MCA evaluation records as showing a moderately negative impact score under the “viability of land’ criterion for Option 8 and that this scoring referred to the location dependent characteristics of the impacted properties including Green Vision Recycling. That assessment is recorded as showing that there was likely opportunity for site reconfiguration and potential to make operational efficiency improvements on some of these sites. [emphasis added].³
- 4.2 In referring to my evidence, Mr Osborne in his rebuttal states that he is of the view that the potential effects of the EWL on the respective operations of several companies including Downer (Green Vision) “will not result in additional business disruption (beyond the isolated business impacts which will be managed via site acquisition or reconfiguration)...”.⁴ However, when referring to the Green Vision site he specifically accepts the potential impact on Green Vision (para 6.21) – i.e that it will no longer be feasible to continue the Green Vision Recycling operations on this reduced site. To counter this he discounts the effect in terms of the “net level of potential impact on the community” but predicates this impact on the availability of an alternative site, despite my evidence that an extensive search of alternative sites has confirmed that there are no viable alternatives and that the resulting available site is not commercially viable for its current operations. To discount the potential costs of the loss of the recycling operation by reference to an alternative that is not likely to be feasible, in my view, fails to take into account the overall loss of this type of operation to the community. It also seems unlikely to me that the efficiency of the relocation of a recycling operation further afield would likely improve in the long term. As per the point in paragraph 6.20 of my evidence there is a shortfall of heavy industrial land within the Auckland region. Our experience is that the further our business is away from its customer base the less financially viable it becomes.

³ Linzey Rebuttal Alternatives at Para 5.7

⁴ Para 1.3

- 4.3 In my view, the loss of this regionally significant recycling operation, solely as a result of a link road, (as opposed to the location of the core corridor), requires a more detailed consideration of the alternatives proposed.

Stacy Goldsworthy

August 2017