

Before an Independent Commissioner of Wellington City Council

Under the Resource Management Act 1991

In the matter of a resource consent application for the Future Accommodation Strategy to develop the western portion of the site at 1 Molesworth Street, Wellington

**EVIDENCE OF RUSSELL JOHN ALLEN ON BEHALF OF THE APPLICANT IN SUPPORT
OF APPLICATION FOR RESOURCE CONSENT**

CONSTRUCTION MANAGEMENT

15 May 2023

1. INTRODUCTION

1.1 My full name is Russell John Allen. I am an independent project management consultant currently contracted to Parliamentary Service as Future Accommodation Strategy Project Lead.

1.2 I am authorised by the Applicant, Parliamentary Service, on behalf of His Majesty the King, to give this statement of evidence on his behalf.

2. QUALIFICATIONS AND EXPERIENCE

2.1 I hold a Bachelor of Architecture (Honours) from Victoria University. I am an Architect member of New Zealand Institute of Architects. I have been a Registered Architect, New Zealand Registered Architects Board, though this registration is currently on hold.

2.2 I am currently an independent contractor – project management specialist. I have +15 years' experience as client side and external architect / project manager on complex projects including those of public significance. I have an intricate knowledge of the proposal from involvement in varying roles since its commencement.

2.3 I started on the proposal in 2015 as an external Project Manager, collaborating with stakeholders and governance in assessing the need and developing the brief. I collaborated with the client in establishing a project team and led the design process to translate the brief to a built outcome prior to its pause in 2017. Following its restart in 2019, I led design development and stakeholder liaison as the external Senior Project Manager (acting as external Project Director).

2.4 Since 2022, I have been the client-side Project Lead and am the day-to-day strategic lead and point of liaison for project team and stakeholders. I am currently the client representative in completing design and am collaborating with stakeholders on operational change management for construction and post occupation periods.

2.5 I will be the point of accountability for successful construction delivery so I am maintaining a level of oversight in relation to conditions of consent.

3. CODE OF CONDUCT

3.1 I have read the Code of Conduct for Expert Witnesses outlined in the Environment Court's Practice Note (2023) (**Code**) and have complied with it in preparing this evidence. I also agree to follow the Code when presenting evidence to the Independent Hearing Commissioner. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state that I rely upon the evidence of other expert witnesses. I also confirm that I have not omitted to consider material facts known to me that might alter or detract from my opinions.

4. SCOPE OF EVIDENCE

4.1 I have been asked to provide evidence in relation to Construction Management aspects of the proposal and as such my evidence will cover the following matters:

- (a) Construction Management controls:
 - (i) Traffic and access requirements
 - (ii) Noise
 - (iii) Dust / dirt
 - (iv) Site activity and temporary visual effects
- (b) Stakeholder consultation
- (c) Comments on the Council's Report
- (d) Comments on submissions; and
- (e) Conclusions

4.2 For the purpose of this hearing I have endeavoured to avoid repeating information that has already been provided in the application reports and instead I refer to that material where relevant.

5. SUMMARY OF EVIDENCE

- 5.1** In my opinion, and based on my experience, the effects of construction from this proposal are typical of those experienced for a project of this scale.
- 5.2** Parliamentary Service is taking active steps to mitigate any construction effects and reduce disruption arising from construction activity for both internal Parliamentary operations and its neighbours and other interested parties. We intend to keep communicating with the site's neighbours as we develop construction plans, with a view to ensuring appropriate methods are put in place to manage the construction effects.
- 5.3** It is important to note that the nature of Parliament operations requires mitigation of construction effects beyond what would typically be required on other construction sites. While I appreciate that these constraints are practical rather than legally binding, they will hopefully provide some comfort to both submitters and others with interests in the Precinct that all efforts will be made to manage construction effects to an acceptable level.

6. CONSTRUCTION MANAGEMENT CONTROLS

- 6.1** In terms of construction effects, this proposal is not particularly unique from other construction projects in Wellington's Central Area of similar nature and scale, in that it will create temporary effects from construction works which cannot be avoided. However, unlike most other Central Area building projects, both the proposed buildings (MUS and BAL) have some separation from the closest adjoining Central Area buildings. Parliamentary Service recognises that there will be construction effects and is committed to working to reduce these effects to the extent possible on both the Parliamentary Precinct and neighbouring stakeholders.
- 6.2** Due to the nature of Parliament operations the Parliamentary Precinct has its own controls for works being completed on site, which in practice often are more stringent controls than are otherwise required by the Council. An example of this is the need to limit noise disturbance while the house is sitting.

- 6.3** I am collaborating with the preconstruction services contractor, and the internal and external project team, to address construction controls and mitigations to allow operational planning for construction delivery. Once the main contractor is appointed, these plans and strategies will transition to become the full detailed Construction Management Plan (**CMP**) as is typical on a large construction project. Consultation with neighbours will occur in parallel with the development of the CMP. I understand from the Council proposed conditions that the CMP will need to be approved by WCC (Council's proposed condition (4)).
- 6.4** Parliamentary Service is committed to collaborating with neighbours over the course of the construction delivery and will hold regular consultation and updates on progress. Our construction contract mechanisms are being prepared to allow for adaptation of working requirements as works progress.
- 6.5** Construction of the proposal will be watched very closely by Politicians, the public and media. Parliamentary Service will require the contractor to act with the utmost professionalism and ensure the reputation of Parliament does not come into disrepute.
- 6.6** It is worth noting that Parliament is fundamentally for the people and by the people, and a building for Parliament needs to be delivered under the same mantra. This proposal is a step in the implementation of a long-term vision to improve the Parliament of Aotearoa, and Parliamentary Service is ensuring our approach considers all parties that may be affected.

Traffic and access requirements

- 6.7** I am working with the preconstruction contractor and consultant team to develop a construction methodology and supporting logistics methodology, which will outline the vehicle movements required to support the construction. The outcome of this will inform the Construction Traffic Management Plan (**CTMP**) in accordance with Council proposed condition (28). A key aim of this methodology is to limit the amount of vehicle traffic through Ballantrae Place. An example of a mechanism

being reviewed in this methodology is a shared site materials / supplies delivery model where items are delivered to an offsite storage facility then collectively delivered to site at predetermined times. Mr Carnell has discussed both Ballantrae Place capacity and the CTMP in more detail in his traffic evidence.

6.8 Ballantrae Place serves a number of residential and commercial premises, and construction site access times will also be coordinated with adjacent property requirements, such as scheduled delivery and rubbish collection.

6.9 Sufficient space is going to be made available within the Parliament Precinct to ensure that construction laydown and working space is contained within the construction site. Access will be provided through Ballantrae Place direct into the construction site, and general construction traffic will not be permitted to remain on the street for extended periods.

6.10 Parliamentary Service considered the use of the Museum Street entrance to the Parliamentary Precinct as a construction entrance, but determined that this is not viable. Museum Street is an active pedestrian and cycle access route. The traffic lights for Bowen Street / The Terrace do not control inward and outward traffic using Museum St, or vehicles entering / exiting Museum Street, and therefore rely on driver judgment of the best time to enter and exit against traffic and pedestrian flows. Incidents occur on a regular basis and Parliamentary Service is actively trying to reduce vehicle movements through this space to subsequently reduce risk. Adding construction vehicles to this situation would only increase risk. Additionally, physical access, and waiting and laydown areas would be restricted due to the larger size of construction vehicles, requiring additional traffic management to be in place on Bowen Street. This would cause disruption to adjacent traffic and further increase the risk of incidents.

6.11 I note however that by exception, deliveries via Museum Street will be required for construction logistics. Given Parliament's operational requirements, these deliveries will need to be prearranged and will be actively managed as far as possible to be outside of peak times. This will also be done in accordance with the approved CTMP.

6.12 From my experience on other construction projects, I expect that construction traffic volumes through Ballantrae Place will be significantly less than the previous volumes while the rear car park was operational (~170parks removed = 340 vehicle movements daily).

6.13 Mr Carnell has discussed operational traffic once the proposed buildings are occupied in his evidence.

Noise

6.14 Dr Trevathan has discussed in detail construction noise expectations associated with the proposal in his evidence.

6.15 Parliament has sensitive noise requirements, and all projects on the Parliamentary Precinct are subject to internal stakeholder expectation around this. While there are not specific criteria in place, the reality in practice is that these expectations create limits in addition to NZS requirements enforced by legislation or the Council.

6.16 In terms of internal policies, all projects are required to have 24/7 availability of a Parliamentary Service Buildings Project Management team member, and external contractor lead managers must be able to deal with any noise issues as they arise. These protocols will be in place on the proposal and will satisfy the contact details requirement under the Council's proposed condition (34).

6.17 Parliamentary Service will continue to collaborate with neighbours and interested parties to identify critical times for noise, and ensure the contractor schedules around these times as much as possible, in accordance with the Council's proposed condition (33).

Dust / Dirt

6.18 I anticipate levels of dust generated by the proposal will be within the normal realms of Central Area construction projects. There is no extensive concrete

demolition or similar activities which would generate excessive dust. Excavation is predominantly contained to building footprints rather than the wider site, and existing hard surfaces can be left intact for as long as possible to reduce spread of dirt. I support the Council's proposed condition (9 – dust suppression is covered by the Erosion and Sediment Control condition) which will require appropriate controls to be in place.

- 6.19** Parliamentary Service will require a 'clean perimeter' policy from the contractor which will require any dirt / muck generated within the construction to remain within the perimeter of the site, or be removed in a contained manner. For example this will include controls such as vehicle wash at site entry / exit points, and removing any material in enclosure.

Site Activity and Temporary Visual Effects

- 6.20** Parliamentary Service is charged with the day-to-day upkeep of the Parliamentary Precinct assets, and so it intricately understands the historical and cultural significance of these, and the need to have them well presented to the public at all times. Great effort is put into mitigating the visual effects of all projects on the Parliamentary Precinct and this proposal will be no different.
- 6.21** Parliamentary Service will require the main contractor to keep the construction site as tidy as reasonably practicable at all times and ensure that all construction activities occur within defined construction areas. This is essential in order to meet our security and health and safety requirements.
- 6.22** Full site hoarding will be required, and will include information panels about the project and vision panels to enable views into the construction site. A strategy is currently under consideration to engage with stakeholders including the neighbouring creche and tangata whenua to inform design elements on these hoardings.

6.23 Parliamentary Service will be limiting the extent of commercial signage able to be installed on the site, and ensuring that the emphasis on the Parliamentary Precinct remains on Parliament, rather than its contractors and suppliers.

7. EXTERNAL STAKEHOLDER CONSULTATION

7.1 There will be ongoing opportunity for neighbours to be consulted on the construction delivery process, controls and possible mitigations. It is the intent of Parliamentary Service to undertake this consultation following the outcome of this consent process, and particularly as part of preparing the various construction management plans required as a condition of resource consent.

7.2 An external stakeholder consultation strategy is being developed in conjunction with the consultant team, which will outline the expectations for consultation on construction delivery, subject to receiving consent.

7.3 The preconstruction contractor is also providing advice on neighbourly stakeholder consultation, and this is being considered in relation to the development of construction management plans as noted above.

8. COMMENTS ON THE COUNCIL REPORT

8.1 I have reviewed the Council Officer's report and proposed consent conditions relevant to construction management and make the following observations;

(a) I support consent conditions (4) to (7) proposed by Council for preparation and submission for approval of a Construction Management Plan.

(b) I support consent condition (8) proposed by Council, but propose for clarity that the wording is amended to "To mitigate adverse visual amenity effects during construction, the consent holder must install creative or interpretive material on any construction hoardings that will

be visible from a public place. This may be limited to elements on the hoarding, or to a portion of the hoarding only rather than in entirety".

- (c) I support consent condition (9) proposed by Council, noting that the dust suppression requirements will align with Parliament's own 'clean perimeter' policy.
- (d) I support consent condition (15) proposed by Council. The ability for periods longer than one month to be certified (as proposed by Council) is important, because dependent on timing of the completion of earthworks, the required grassing or vegetation may not be completed within one month where seasons, weather or specific species requirements of the landscape design / Parliament Precinct landscape strategy may not allow.
- (e) I note proposed condition (18) is addressed within proposed condition (9) so may not be required.
- (f) I support consent conditions (28) to (31) proposed by Council for preparation and submission for approval of a Construction Traffic Management Plan.
- (g) I support consent conditions (33) and (34) proposed by Council for construction noise and submission for approval of a Construction Noise and Vibration Management Plan.
- (h) Council proposed condition (50) requires that existing mains affected by the proposed buildings are re-laid so that they are 1.5m away from building foundations, fences and retaining walls. I am confident that this separation distance can be achieved in most instances, however in particular instances certain potential constraints will require the 1.5m distance to be reduced to 1.0m (for example the requirement to maintain root ball clearances for the relocated Historic Oak tree, and to navigate

existing heritage structures). This change to condition 50 is therefore sought.

9. COMMENTS ON SUBMISSIONS

9.1 I have reviewed the public submissions relevant to my statement of evidence, and comment on them below.

Mr Ben Blinkhorne

9.2 Mr Blinkhorne is Head of Commercial & Operations for Kāpura, the operator of Huxley's Bar and Eatery located on the western boundary of Parliamentary Precinct, immediately adjacent to the construction area.

9.3 Mr Blinkhorne's submission notes:

3. Noise disturbance and construction dust. Highly likely patrons will avoid Huxley's, particularly the outdoor terraced area, during the construction period due to noise and dust associated with construction of the building in such close proximity to Huxley's. This will have an also adverse economic impact on the venue.

9.4 I agree that the proximity of the works to the venue will cause some disruption to Huxley's. Parliamentary Service is willing to work with the venue to identify ways to mitigate this.

9.5 I have met with Mr Blinkhorne to discuss this submission, and we had preliminary discussions on possible mitigations including scheduling of deliveries, acoustic hoardings and the like. Mr Blinkhorne has confirmed his willingness to be involved further in development of construction plans and strategies. I have committed to this when these are developed.

9.6 Parliamentary Service is actively engaging with Huxley's Venue Manager as part of external stakeholder engagement on current civil infrastructure works in the development area. This engagement has been positive and has enabled an understanding of the key trading times and delivery schedule for the venue and for mitigations to be put in place. For example, for a period of time the civil works associated with the project will affect deliveries through Ballantrae Place. An alternative arrangement has collaboratively been developed to allow delivery access through Parliament grounds during those times.

Mr Robertson

9.7 Mr Robertson's submission notes:

There has been no effort to consult with residents of Ballantrae Place prior to lodging this application.

9.8 Due to internal approval requirements within Parliamentary Service, the direction to the project team has been to hold public consultation until after the resource consent process is complete and we have obtained Governance approval to proceed further. At this point, we intend to consult with Ballantrae Place residents including Mr Robertson. However, when we received Mr Robertson's submission, Mr Wills and I met with him (in January this year) to discuss the matters raised in his submission and the key aspects of the proposal that are of interest with him. I have also advised Mr Robertson that we will be in touch directly to confirm arrangements for consultation with Ballantrae Place residents once we reach the stage described above.

9.9 Mr Robertson's submission notes:

Residents of Ballantrae Place have been subjected to construction noise and traffic for several years with the development of the Bowen Campus. There have been numerous complaints because of excessive noise and the disruption to residential activities has been

excessive. The residents do not wish to experience this for a further period during this construction programme.

- 9.10** I understand the timing of the proposal following the recently completed Bowen Campus may cause some frustration for residents, however this is coincidental timing only.
- 9.11** I cannot comment on the effects of the Bowen Campus development on Ballantrae Place residents as it is not a development Parliament has been involved in.
- 9.12** I do note however that the current proposal is not located on the boundary of residents as the Bowen Campus development was, but is within Parliament grounds at the end of Ballantrae Place. The majority of effects from proposed works will be localised within the construction site with appropriate laydown and working space provided within the site.
- 9.13** In my view Parliamentary Service will be able to work with the submitter and other external stakeholders to mitigate effects of construction vehicle traffic on residents, and that is our intention.
- 9.14** When I met with Mr Robertson to discuss his concerns, he confirmed his willingness to be involved further in development of construction plans and strategies and I have committed to this when these are developed.

10. CONCLUSIONS

- 10.1** In my opinion, based on the information presented in my evidence and my knowledge of the project, Parliament Precinct and its surroundings, the construction impacts of the proposal can be avoided or appropriately mitigated.
- 10.2** I support the construction related Council proposed conditions of consent, subject to the amendments I have suggested above, and which are incorporated into a consolidated set of amendments attached to Mr Coop's statement of evidence. I

consider that those conditions will ensure the construction occurs in an appropriate and well-managed manner.

Russell John Allen

15 May 2023