

**BEFORE AN INDEPENDENT HEARINGS PANEL
OF THE HAMILTON CITY COUNCIL**

IN THE MATTER of the Resource Management Act
1991 (**RMA**)

AND

IN THE MATTER of an application for resource
consent for the redevelopment of the
former Hamilton Hotel building at 170
Victoria Street, Hamilton CBD.

**STATEMENT OF EVIDENCE OF TRISTAN HOWARD
ON BEHALF OF THE APPLICANT**

**CONSTRUCTION MANAGEMENT
1 October 2019**

1. QUALIFICATIONS AND EXPERIENCE

1.1 My full name is Tristan Howard. I am Senior Project Manager at Southbase Construction.

1.2 I hold a BSC (Honours) in Construction Management from the University of Bedfordshire, UK with, in excess of 30 years in the Construction Industry; the last 15 years being in Construction Project Management in the UK, Australia and New Zealand. Design and build projects have been the main focus over the past 7 years.

1.3 I have worked extensively across many genres of construction including residential, commercial, industrial, leisure and development and infrastructure. The majority of the projects over the past 7 years have been design and build with my role extending to Design Coordinator / Manager

1.4 Southbase Construction have been engaged as the preferred contractor on an Early Contractor Involvement (ECI) basis since January 2019. The purpose of the Early Engagement has been to advise on numerous aspects of the project including, but not limited to:

- a) Buildability through all design phases;
- b) Value Management as design progresses;
- c) Risk and Opportunities; including cost, programme, methodology, Safety in Design; and
- d) Preparation of Construction Management Plans and substantiating documentation in order to satisfy the Principle and all relevant Stakeholders.

2. CODE OF CONDUCT

2.1 My qualifications as an expert are set out above. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise and I have not omitted material facts known to me that might alter or detract from my evidence.

3. SUMMARY OF EVIDENCE

3.1 I have been asked to provide evidence in relation to structural activities in the close proximity to the Protected Tree Zone as well as Construction Traffic.

3.2 I have previously prepared a Draft Construction Management Plan (**CMP**) dated July 2019, which was lodged with the resource consent application. This provides in part, an over-arching methodology for the construction phase with the additional section within the plan being applicable to the Arboricultural Works. Works will be carried out in consultation with, and agreement with the Appointed Arborist Consultant, to ensure compliance with the resource consent conditions and address effects on trees. I have read the submissions received on the application and the Council Report.

3.3 My evidence will address the following aspects of the resource consent, which are within my area of expertise:

- a) Proposed construction methodology;
- b) Comments on the Council Staff Report, including in relation to activities in close proximity to the Protected Tree Zone;
- c) Consideration of submissions;
- d) Traffic Management Plan (**TMP**) has been addressed in a further document provided by Russell Brandon; however, is also identified within the Construction Management Plan whereupon it has been confirmed this will be developed further upon award of contract; and
- e) Conclusion.

4. RELEVANT FACTS AND CONTEXT

4.1 I have relied on the description of the Project set out in the Application and the evidence of David Pugh (Jasmax Architects). I have also read the evidence of Jon Redfern-Hardisty (Arborlab Consultancy Services), Russell Brandon (Flow) and Daniel Mills

(CMW Geosciences). However, in terms of my evidence the key aspects of the Project are:

- a) **Piling** – including the movement of required plant and equipment to carry out the screw-pile operations in the vicinity of the Tree Protection Zone (**TPZ**);
- b) **Structural Concrete Works** - formation of associated pile caps and beams (formwork, reinforcement, concrete pour) in the vicinity of the TPZ;
- c) **Structural Steel Erection** – structural steel frame erection of the Level B1 decking area and the external glazed screen structure; this including all necessary access such as scaffold structures within the TPZ; and
- d) **Traffic Management** – at this stage this is treated as an overview with further TMPs to be developed via an external traffic management company in conjunction with Hamilton City Council (**HCC**) transportation guidelines. The Traffic Assessment document should also be referred to; this being subject to additional statement of evidence (from Russell Brandon).

5. PROPOSED CONSTRUCTION METHODOLOGY

5.1 An overarching methodology has previously been presented within the Construction Management Plan which provides an overview of the scheduled works. However, each subcontractor appointed for the works will provide a site-specific methodology applicable to their trade. As a result of submitters concerns regarding the preservation of the protected trees within the subject site these documents will identify mitigation strategies detailing preventative measures required for the preservation of the remaining trees and associated tree protection zone.

5.2 **Tree Root Protection** – protection required for the movement and placement of piling drilling rigs and excavators will be conducted utilising protective layers of material as identified within AS4970-2009 Protection of Trees on Development Sites. Additionally, the protection of the inground root structure during the drilling process will be carried out in line with the relevant Arboricultural Assessment which focuses on identification, exposing and avoidance; where reasonably practicable.

- 5.3 Tree Canopy Protection** – the design of screw piles, particularly their length will take into consideration the distance to the underside of the tree canopy thus ensuring contact is not made between piling plant / equipment and the tree branches. This will also determine the size and specification of the plant / equipment to be utilised for piling operations
- 5.4 Tree Protection Zone** – The TPZ is to be established from the outset with only specific and mutually agreed activities with the Approved Arborist Consultant taking place within the Zone. Adequate isolation measures as specified by the Specialist Arborist Consultant will be established to protect the roots and the crown from all adjacent construction activities.
- 5.5 Tree Maintenance and Irrigation** – an irrigation methodology will be developed to ensure the health of the trees is not compromised during construction. By the nature of the works, groundwater will be removed; an irrigation system will maintain required water levels whilst the inclusion of additional media will ensure the moisture to the tree root system is maintained noting reference to the evidence of Dan Mills.
- 5.6 Embassy Plaza** – Proposals have been submitted to allow for the use of Embassy Plaza during the construction phase of the Theatre. Having this area available for the siting of mobile cranes and associated deliveries would assist with the overall construction programme particularly to the North elevations. Excavated material from the subject site could be deposited within Embassy Plaza to raise to required levels for the proposed upgrade with the additional benefit of reducing the amount of cart-away trucks entering the public roads.

6. COMMENTS ON THE COUNCIL STAFF REPORT

- 6.1** I have no comments on the Council Staff Report.

7. CONSIDERATION OF SUBMISSIONS

- 7.1** Regarding Submissions 12, 13, 19, 24 and 25 all of which raise concerns and oppose the removal of the trees and further concerns regarding their protection from a heritage and historic perspective. Strict adherence to the Arboriculture Assessments, Resource Consent Conditions and relevant Australian Standards applicable to the protection and

preservation of trees during construction activities will be upheld throughout the construction period. Guidance has and will continue to be sought regarding the best practises for the protection and preservation of the trees that are to remain.

7.2 All subcontractors will be fully briefed of the requirements expected of them during their respective activities and operations on site and in close proximity of the trees to remain.

7.3 Whilst the increase in traffic as a result of the construction works is inevitable, the management of the traffic and adjacent roads will mitigate the potential disruption and ensure that safety of other road users, pedestrians and businesses is not compromised. This will be detailed further in the Construction Traffic Management Plan (as discussed in the evidence from Russell Brandon).

8. CONCLUSION

8.1 The Consent Holder will adhere to the requirements set out within the Resource Consent Conditions and comply with all relevant Standards and rules applicable to the preservation of the trees that are to remain. However, there are numerous alternative methods available to comply with the conditions. These will become more apparent during the specialist subcontractor selection process following award of the main contract.

8.2 Maintaining the safety of road users and the public will remain paramount throughout the entire construction period. It is proposed for regular forums to be established whereupon open discussion can occur with local businesses regarding scheduled works and how it may disrupt activities in the CBD.

8.3 The use of Embassy Plaza for construction of the Theatre, coordinated with the upgrade to these public gardens can be managed jointly thus reducing the potential disruption to this area.

Tristan Howard

For and On Behalf of Southbase Construction

1 October 2019

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