



WELLINGTON INNER CITY IMPROVEMENTS NATIONAL WAR MEMORIAL PARK (PUKEAHU)

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

CERTIFICATION REVIEW

Prepared for:

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Date Issued: August 21st 2013

Document Version: v1.0

CEMP - CERTIFICATION REVIEW

August 2013

REPORT INFORMATION AND QUALITY CONTROL

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Document Name:	CEMP Certification Review	Document Reference:	AA0797
Version:	V1.0	Status:	Final
Date:	21 August 2013		



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CERTIFICATION OF DOCUMENT

In accordance with section 19(2)(b) of the National War Memorial Park (Pukeahu) Empowering Act 2102 ("the Act"), the following document is certified as being consistent with, and will give effect to, the condition(s) of Schedule 3 of the Act to which it relates:

Construction Environmental Management Plan – [CEMP]

prepared by the Memorial Park Alliance, and
dated 10 July 2013

This certification is given for the reasons set out in the review titled:

*Wellington Inner City Improvements,
National War Memorial Park (Pukeahu),
Construction Environmental Management Plan [CEMP]
Certification Review*

prepared by Andrew Stewart Limited in association with
Ridley Dunphy Environmental Limited, and
dated 21 August 2013.

Certifier



Mark Ashby
Member, New Zealand Planning Institute

Dated: 21 August 2013

1 INTRODUCTION

1.1 Review authors

This review has been prepared under commission to the Interim Alliance engaged by the New Zealand transport Agency (NZTA) to implement the undergrounding of Buckle Street. The review's authors are Andrew Stewart Limited and Ridley Dunphy Environmental Limited. The purpose of this review is "certification", as defined by sections 4 and 19(2)(b) of the National War Memorial Park (Pukeahu) Empowering Act 2012 ("the Act").

Section 20 of the Act, and condition NZTA 29 of Schedule 3 to the Act, requires the certifier to be a qualified planner, supported by a suitably experienced construction professional. To meet these requirements, the certifier is Mark Ashby (Andrew Stewart Limited), who specialises in resource consent acquisition and the development of planning policy. The supporting construction environmental specialist is Graeme Ridley (Ridley Dunphy Environmental Limited), who brings technical expertise in the management of environmental effects related to major construction projects. Mr. Ridley's peer review comments are attached as Appendix B to the management plan under review (CEMP).

The CEMP review process included:

- Site visit 31 May 2013;
- Meeting with CEMP author to discuss management plan structure and content, and to gain an appreciation of the site and project environmental constraints, issues and opportunities;
- Formal review of draft CEMP by the reviewers;
- Amendments to CEMP; and
- Further reviews of CEMP to the position of approval.

The qualifications and affiliations of the reviewers are:

Mark Ashby

Role: Planner / Certifier

Qualifications: Bachelor Regional Planning (Hons), Massey, 1984

- Affiliations:
- Member New Zealand Planning Institute (MNZPI)
 - Member Resource Management Law Association of New Zealand

Graeme Ridley

Role: Environmental specialist

Qualifications: Bachelor of Agricultural Science (soil sciences), Massey, 1986

- Affiliations:
- International Erosion Control Association (Director)

1.2 Wellington inner city improvements

The Wellington inner city improvement projects are aimed at making State Highway 1 the preferred and most efficient route for vehicles travelling between Wellington's central business district and the eastern suburbs. The undergrounding of a section of Buckle Street (and construction of the National War Memorial Park overhead), is one of a suite of projects being implemented by NZTA.

On 7 August 2012, the Government announced a project to underground Buckle Street in front of the National War Memorial. Government also allocated funds to create a new, unified National Memorial precinct. This project is a key part of the Ministry of Culture and Heritage's commemoration of the centenary of the First World War, and the completed New Zealand Memorial Park will be in place by ANZAC Day 2015.

1.3 Empowering Act and schedules

To expedite the project, the Government chose to pass empowering legislation. That legislation, the National War Memorial Park (Pukeahu) Empowering Act 2012, grants all necessary statutory authorisations to NZTA and the Ministry of Culture and Heritage. In effect, the authorisations have provided a project-specific alternative to the Resource Management Act, Historic Places Act, and Building Act processes that would otherwise be required.

Schedules to the Act specify, among other things, resource consents granted to NZTA and the conditions attached to them, and the designation provided to NZTA, and the conditions attached to it.

1.4 Environmental management plans and certification

As specified by the schedules to the Act, particular environmental management plans (EMP) are required to be prepared. The Act also requires that those plans be certified by suitably qualified persons. The purpose of certification is to ensure that any EMP is consistent with the conditions set out in schedules to the Act, and that the plan provides an appropriate means to ensure that the conditions are able to be met.

The Construction Environmental Management Plan is an overarching document for the project, under which sit the following other management plans required by the Act:

- Construction noise and vibration management plan (temporary road)
- Construction noise and vibration management plan (undergrounding)
- Construction air quality (dust) management plan (temporary road)
- Construction air quality (dust) management plan (undergrounding)
- Erosion and sediment control management plan
- Heritage management plan
- Construction traffic management plan
- Local roads traffic improvement plan
- Network utility management plan

The CEMP is the subject of this review.

1.5 Nature of environmental management plans

The content of the required management plans is set out in the conditions of Schedule 3 to the Act. The conditions note a specific range of matters to be addressed by each of the EMPs.

Notwithstanding the matters spelled out by the scheduled conditions, EMPs as a general class of plan have the following typical characteristics. They:

- Are a 'living' document that focusses on continual improvement and should be updated as necessary;
- Help ensure the application of best practice environmental management to a project;
- Implement conditions of approval or consent;
- Ensure compliance with environmental legislation; and
- Ensure that environmental risks associated with a project are properly managed.

2 APPLICABLE CONDITIONS

The National War Memorial Park (Pukeahu) Empowering Act 2012 includes conditions applicable to the Construction Environment Management Plan.

Those conditions, taken from Schedule 3 of the Act, are set out below followed by the reviewers' notes on how the CEMP is consistent with and gives effect to the conditions. As noted at the beginning of Schedule 3 of the Act, "Manager" in the context of any of the conditions means the Wellington City Council's Manager, Development, Planning and Compliance or their nominee.

2.1 NZTA 11

Specific to the CEMP, condition NZTA 11 of Schedule 3 of the Act specifies that:

The undergrounding of Buckle Street shall not commence until—

- (a) the Agency has prepared a Construction Environmental Management Plan (CEMP) for the construction works authorised by this designation; and
- (b) a qualified planner (supported as necessary by a suitably experienced construction professional) has certified that the methods provided for in the CEMP are consistent with the conditions of this designation relating to construction works and provide for appropriate means to ensure as far as practicable those conditions of the designation are able to be met.

The Agency may commence investigations and enabling works for the Project (including construction and use of the proposed at-grade diversion of Buckle Street and any other temporary roads) prior to the CEMP being certified.

Reviewer notes

- Investigation and enabling works for the undergrounding commenced in advance of the CEMP preparation (as envisaged by the Act), but under the guidance of a draft CEMP.
- The document has been submitted for review to a planner, and an environmental specialist, who are both suitably qualified as noted in section 1.1 of this review.

Finding 11

Based on the matters referred to above under Reviewer Notes, condition NZTA 11 has been met.

2.2 NZTA 12

Specific to the CEMP, condition NZTA 12 of Schedule 3 specifies that:

The Agency shall, at least 5 working days prior to submitting the CEMP to a qualified planner for certification, submit a draft of the plan to the Manager for comment. Any comments received shall be supplied to the certifier when the CEMP is submitted for certification in accordance with condition NZTA 11, along with clear explanation of where any comments have not been incorporated and the reasons why.

Reviewer notes

- The reviewers were provided with evidence that the appropriate WCC staff had seen the draft CEMP, and had no comments to make.

Finding 12

Based on the matters referred to above under Reviewer Notes, condition NZTA 12 has been met.

2.3 NZTA 13(1)

Specific to the CEMP, condition NZTA 13(1) of Schedule 3 specifies that:

The CEMP shall provide details of the responsibilities, reporting frameworks, coordination and management required for Project quality assurance; final detailed design; construction methodologies; timeframes and monitoring processes and procedures.

A CEMP shall include but need not be limited to—

1 *Quality Assurance*

A Quality Assurance section which shall include management frameworks, systems and procedures for quality management of all on-site activities and compliance with the conditions imposed on this designation to assist the Agency in constructing the Project. Among other matters this section shall provide details of the following:

- (a) name, qualifications, relevant experience and contact details of an appropriately qualified and experienced project manager, who shall be responsible for overseeing compliance with the CEMP; and
- (b) names, qualifications, relevant experience, and methods for contacting principal staff employed on the Project, along with details of their roles and responsibilities; and
- (c) methods and systems to inform and train all persons working on site of potential environmental issues and how to comply with conditions of the designation; and
- (d) systems and processes whereby the public are informed of contact details of the project manager and principal staff identified above; and
- (e) liaison procedures with the Council; and
- (f) communication protocols.

Reviewer notes

- The CEMP does not include a single Quality Assurance section, but its overall content does provide the required details.
- Names qualifications and contact details of the personnel required to be specified, are included in Section 2 and in Appendices B and C of the CEMP.
- Training is appropriately addressed in Section 2 of the CEMP.
- Systems and processes for informing the public of contact details are covered in Section 2 and Section 6 of the CEMP.
- Liaison procedures with the Council are detailed in Section 2 of the CEMP.
- Communication protocols are covered by Sections 2 and 6 of the CEMP.

Finding 13

Based on the matters referred to above under Reviewer Notes, condition NZTA 13(1) has been met.

2.4 NZTA 13(2)

Specific to the CEMP, condition NZTA 13(2) of Schedule 3 specifies that:

A CEMP shall include but need not be limited to—

2 Site Management

The Site Management section of the CEMP shall detail procedures to manage the Project throughout the entire construction process in a safe manner. The information provided in this section shall include, but need not be limited to information in relation to the following:

- (a) details of the site access for all work associated with construction of the Project; and
- (b) measures to be adopted to maintain the site in a safe and tidy condition in terms of disposal/storage of rubbish, storage and unloading of building materials and similar construction activities; and
- (c) location of workers' conveniences (e.g. portaloos); and
- (d) procedures for controlling sediment runoff from open earthworks, any debris and construction materials and from wheel wash facilities into stormwater systems; and
- (e) a contingency plan in the event that there is an uncontrolled discharge to the stormwater network; and
- (f) details of the storage of fuels and lubricants (which shall require that storage be bunded or contained in such a manner so as to prevent the discharge of contaminants from spillages); and
- (g) details of the proposed maintenance of machinery and plant to minimise the potential for leakage of fuels and lubricants; and
- (h) location of vehicle and construction machinery access and storage during the period of site works; and
- (i) methods to manage public health and safety during the construction works, and notification to the public of temporary access restrictions to the immediate works area during the staged construction; and
- (j) procedures for removing all contaminants (e.g. fuel, hydraulic oils, lubricants etc) from the site at the end of the construction period, except for those required for ongoing maintenance of the road and operational activities; and
- (k) site security measures; and
- (l) how health and safety and emergency response and evacuation measures will be addressed (which could be through contractors being required to prepare specific health and safety and/or emergency response and evacuation plans).

Reviewer notes

- The CEMP does not include a single Site Management section, but its overall content does provide the required details.
- Details of site access are covered in section 5 of the CEMP and conceptually shown in Appendix E.
- Safe and tidy site maintenance is covered in sections 4 and 5 of the CEMP.
- Location of workers' conveniences is covered in section 5 of the CEMP and shown in Appendix E.
- Erosion and sediment control is covered in sections 4, 5 and 7 of the CEMP; and through reference to the Erosion and Sediment Control Plan;
- Contingency for uncontrolled discharge to stormwater networks is covered in section 7 of the CEMP.
- Safe storage of fuels and lubricants is covered in section 5 of the CEMP.
- Machinery access and storage is covered in section 5 of the CEMP and shown in Appendix E.
- Public health and safety is covered in section 2 and 5 of the CEMP and references a separate Health and Safety Plan. While not specifically reviewed under the CEMP this Health and Safety Plan forms a key part of the construction programme for the project and is considered to adequately address the provisions of condition 13(2).
- Contaminant removal at the end of the construction process is covered in section 7 of the CEMP.
- Site security is covered in section 5 of the CEMP.
- Emergency response and evacuation is covered in section 5 of the CEMP.; and through reference to the Health and Safety Plan.

Finding 13(2)

Based on the matters referred to above under Reviewer Notes, condition NZTA 13(2) has been met.

2.5 NZTA 13(3)

Specific to the CEMP, condition NZTA 13(3) of Schedule 3 specifies that:

A CEMP shall include but need not be limited to—

3 *Construction programme and methodology*

A construction programme which shall include a programme of works that seeks to enable the Project to be constructed in a manner that is timely, adequately coordinated and manages the adverse effects of construction on the environment. The information to be included in this section includes, but need not be limited to, information in relation to the following:

- (a) a detailed staging programme and anticipated timetable for construction works; and
- (b) a methodology to identify how works will be staged to manage the construction effects of the Project on—
 - (i) residential, business, and other properties on Tory and Tasman Streets;
 - (ii) Mt Cook School, Tory Street;
 - (iii) National War Museum and the Carillon, 7 Buckle Street;
 - (iv) National Museum (former), 7 Buckle Street;
 - (v) Home of Compassion Creche (former);
 - (vi) HMNZS Olphert, Sec 90 Town of Wellington;
 - (vii) the former Army Headquarters Building, Sec 90 Town of Wellington;
 - (viii) the former Mt Cook Police Barracks and retaining wall, Buckle Street;
 - (ix) Te Papa Archives, Tory Street;
 - (x) the local road network.

Reviewer notes

- The CEMP does not include a single Construction Programme and Methodology section, but its overall content does provide the required details. The figures within Appendix D provide a useful conceptual staging and sequencing construction programme.
- A summary of the construction programme is provided by section 3 of the CEMP (including Table 3). Staging and timing is also included as Appendix H.
- A methodology to identify the management of construction effects on the specified properties and resources is inherent in the proposed use of Construction Method Statements (section 2 and Appendix A of the CEMP).
- The potential for adverse effects on the specified properties and resources is recognised throughout the CEMP, and through the specific actions of its subordinate plans related to such matters as dust and noise control.

Finding 13(3)

Based on the matters referred to above under Reviewer Notes, condition NZTA 13(3) has been met.

2.6 NZTA 13(4)

Specific to the CEMP, condition NZTA 13(4) of Schedule 3 specifies that:

A CEMP shall include but need not be limited to—

4 *Layout drawings*

Drawings showing the proposed layout of the carriageway design and footprint, construction yards and compounds, including associated buildings, fencing and site accesses. The layout drawings shall, as far as practicable, show the location of the following:

- (a) noisy construction activities, which shall be located as far away as practicable from residential dwellings and schools; and
- (b) temporary acoustic fences and visual barriers; and
- (c) any on-site hazardous substance storage facilities.

Reviewer notes

- The CEMP includes conceptual layout drawings in Appendix D and E.
- In conjunction with the project's noise management plan, the reviewers consider these drawings adequate to meet the purposes specified by the Act.

Finding 13(4)

Based on the matters referred to above under Reviewer Notes, condition NZTA 13(4) has been met.

3 SUMMARY OF FINDINGS

The document *Construction Environmental Management Plan (CEMP)* dated 10 July 2013¹, has been reviewed by a qualified Planner and a qualified Environmental Engineer. The document has been found to be consistent with the applicable conditions of Schedule 3 of the Act, being conditions NZTA 11, 12 and 13.

Provided that the measures and procedures identified in the document are consistently adhered to and amendments made as necessary within the provisions of the Act, the construction environmental management framework will give effect to the conditions of the Act. The reviewers note that the management plan provides a suitable framework for addressing issues as (or if) they arise, both on its own and in conjunction with subordinate plans. This 'reactive framework' approach is consistent with the typical nature of a construction environmental management plan.

Other management plans fall under, or are closely related to, the CEMP. These other management plans have either already been prepared and are in use (as is provided for by the Act), or are in development. The reviewers recommend that these other management plans should be reviewed for consistency with the CEMP, now that the CEMP has been finalised.

¹ The CEMP is dated 10 July 2013, and the latest version supplied to the reviewers was received 17th July 2013. After that, the document has been subject to an iterative process of development and improvement, including via discussions with the certifier / reviewers.

APPENDIX A: TECHNICAL PEER REVIEW (CONSTRUCTION MANAGEMENT)