

**One Tasman Pukeahu Park
1 and 23 Tasman Street,
Mt Cook, Wellington**

Independent Historic Heritage Review

29th January 2023

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1. Introduction

I have been appointed by One Tasman Development Limited Partnership to prepare an independent historic heritage review of their proposed resource consent application for the redevelopment of 1 and 23 Tasman Street, Mt Cook, Wellington; known as 'One Tasman Pukeahu Park'.

In preparing this review, I note that Resource Consent was recently granted for the construction of a new multi-building, multi-storey residential development on the site. I did not prepare an independent historic heritage review of the development now granted resource consent.

It is my understanding that the now granted consent had initially proceeded on the basis that the proposal involved the construction of:

- Northern Apartments: a 10-storey base-isolated building at the northern end of the site with 104 apartments.
- Southern Apartments: a 9-storey base-isolated building at the southern end of the site with 92 apartments.
- Terrace Houses: 3-storey terrace houses, five fronting Old Buckle Street and four on the corner of Old Buckle Street and Tasman Street.
- Courtyard Terraces: eight 2-storey terrace houses situated above the central carpark.

In response to matters raised by Wellington City Council, the applicant subsequently modified the proposal to reduce the height of the Northern and Southern Apartments to 8 and 5-storeys respectively, along with other minor amendments.

The current proposal is similar to the original proposal as originally lodged in all respects that are material to my Independent Historic Heritage Review.

My assessment is that the historic heritage effects of the current proposal are less than minor when considered against the environment including the consented 8 and 5-storey development. For completeness, I consider that the effects of the current proposal are also less than minor when considered against the current, physical characteristics of the site.

In preparing this report I have been provided with:

- The original application, including AEE prepared by Urban Perspectives Ltd, Application Drawings and Townscape Views prepared by Athfield Architects Limited.
- Assessment of Effects on Heritage, Archifact Architecture and Conservation Ltd, January 2023
- Heritage Advisor Assessment on Resource Consent Application, Chessa Stevens, Consultant Heritage Advisor to WCC, 22nd November 2021 (in relation to the now granted resource consent).

I undertook a visit to the site and local area on the 5th August 2022, accompanied by Nick Owen of Willis Bond. This included visiting each of the viewpoints identified in the Townscape Views document. I visited the local area again on the 2nd October 2022, specifically to consider the relationship of the Mt Victoria residential area to the application site.

Preparation of this Report

This report has been prepared by Richard Knott. Richard has worked in the areas of heritage, special character, urban design and planning since 1989. He holds post graduate qualifications in all of these areas:

Post Graduate Diploma Building Conservation, School of Conservation Sciences, Bournemouth University

This two year post graduate course covered all areas of building conservation, including theory, best practice and materials/repair.

Master of Arts Urban Design, University of the West of England

This three year post graduate course focused on delivering contextually appropriate design responses, through developing an understanding of the assessment of the significance and characteristics of areas. The course concentrated on appropriate design within Conservation Areas, being areas of special architectural or historic interest (the UK equivalent of Historic Heritage Areas). Richard's independent research concentrated on investigating how best to assess the values of areas and the success of Conservation Area legislation.

Bachelor of Planning

BA(Hons) Town and Country Planning

Richard's postgraduate and undergraduate planning degrees included significant taught elements and workshops on urban design matters, along with a fourth-year concentration on site design.

Richard has been elected a full member of:

- ***Institute of Historic Building Conservation, UK***
- ***New Zealand Planning Institute***
- ***Royal Town Planning Institute, UK (Chartered Town Planner)***
- ***Institute of Highway Engineers, UK***

To expand his knowledge and understanding of global best practice in historic heritage, special character and visual impact matters, Richard has undertaken overseas continuing professional development courses, including the 2016 University of Southern California Fundamentals of Heritage Conservation summer school and 2019 Planning Institute of Australia landscape and visual assessment training.

Throughout his career Richard has led projects relating to heritage buildings, conservation areas and special character areas. His experience in relation to historic buildings has included (but is not limited to):

- Area wide heritage and conservation areas studies; identifying and designating new conservation areas/heritage areas.
- Historic Heritage Assessments.
- Conservation Area Appraisals.
- Managing heritage assistance funds.
- Conservation plans for historic heritage buildings.
- Advice to a significant number of heritage building owners regarding re-use, alteration and repair, ranging from medieval to post-modern buildings.
- Assessment of many proposals to alter or demolish heritage buildings.
- Author of various conservation and heritage design guides.
- Masterplans for historic town centres, most recently a town centre Masterplan for Opotiki Town Centre.

2. Archifact Assessment of Effects on Heritage

The Archifact Assessment of Effects on Heritage (Archifact Report) follows an appropriate methodology, based on the identification of the place, an identified methodology, background to the site and context, and an assessment of effects on heritage.

The section on the assessment of effects on heritage steps through ODP and PDP policies and design provisions, as well as consideration of the Basin Reserve flyover panel decision.

In considering the Basin Reserve flyover panel decision, the Archifact Report notes that the Board of Inquiry did not find that there was a specific or significant relationship between the Basin Reserve Historic Area and the Pukeahu/National War Memorial area. The Report concludes that the proposal would not generate the dominance and severance effects that the Basin Reserve Flyover was found to generate.

The report confirms that:

- The site is not a heritage scheduled or listed site in its own right, but there are a number of adjacent and nearby significant heritage buildings, elements and spaces.
- The new development has been designed to respect and be sympathetic to the nearby heritage; it sits appropriately within the site, maintains the characteristic mixed-grain of the surrounding existing context, and does not dominate the surrounding heritage elements.
- The collection of heritage elements around the National War Memorial, the Dominion Museum, the former Mount Cook Police Station building and the Tasman Street wall on its eastern boundary, and the former Army Headquarters Building to the west can be considered collectively, in conjunction with the Pukeahu National War Memorial Park public setting to the north, to describe a collective heritage context. The proposed scheme respects and maintains the character and significance of the individual and collective heritage elements and enables their continued appreciation and interpretation.
- The National War Memorial's Carillon tower is significantly higher than the proposed development and remains the primary skyline element that will be visible from the Te Aro Valley and the wider Wellington context.
- The focal status of the Carillon tower and the National War Memorial is reinforced in the configuration of the apartment towers across the site: and the split of the north and south towers maintains sightlines from the Mount Victoria Tunnel exit.
- The scheme represents an appropriate and supportable scheme that respects the identified historic heritage values of the adjacent and nearby heritage buildings, elements, and spaces, minimises effects, and enhances those values and the wider public benefit.

I accept and endorse the findings of the Archifact Report.

3. WCC Heritage Review

A 'Heritage Advisor Assessment on Resource Consent Application' (the Review) of the consented development, as originally lodged, was prepared for WCC by Chessa Stevens, Principal Conservation Architect and National Built Heritage Lead for WSP. As the proposed new application does not materially differ from the extant consent, as lodged, I respond to matters raised by Ms Stevens below.

The Review sets out the heritage values in the vicinity, legislative requirements, an assessment of the proposal (including commentary on the Archifact Report, and heritage effects consisting of assessment of ODP objectives, policies and design guides), consideration of Part 2 of the RMA, comments from HNZPT, conclusions and suggested changes to the proposal.

The Review confirms that the site does not contain any individually listed heritage buildings, nor is it in a heritage area.¹ The review identifies the following heritage items as being in close proximity to the site:

- Former National/Dominion Museum 1933-36, 7 Buckle Street (16/40)
- National War Memorial and Carillon 1931-32, 1960-64, 7 Buckle Street (16/41)
- Mount Cook Police Station and retaining wall 1894, Buckle Street/corner Tasman Street (16/43)
- Brick Wall c1894, Tasman Street (16/54)
- Home of Compassion Creche (former) 1914, Buckle Street (16/42)
- Former Army Headquarters Building 1911-12, Buckle Street/corner Taranaki Street (16/424)
- Museum Stand, Basin Reserve 1924, 2 Rugby Street (16/449)
- William Wakefield Memorial pre-1890, Dufferin Street (16/11)

The Review confirms that each of these items is also individually listed with HNZPT and that HNZPT have also listed the Basin Reserve Historic Area. Subsequent to the WCC Heritage Review, I note that the Proposed District Plan includes the Basin Reserve as a new Heritage Area.

The report indicates that:

As 1-23 Tasman Street is within the Central Area, and parts of the proposed development do not comply with the specified standards for this Area, the effects on the historic heritage value of any listed heritage items in the vicinity are required to be considered.

In relation to Part 2 of the RMA, the Review quotes from the Basin Reserve Flyover Board of Inquiry Decision that:

Our overall evaluation is not simply a matter of considering effects on listed heritage items or confining our evaluation to a consideration only of the loss or restoration of heritage fabric, although such historic heritage effects are part of the cumulative picture. We must consider the character and significance of the whole wider heritage area and the appropriateness of such a structure within it.²

The Review suggests that the Board Decision is relevant as *'the proposal is within the same "wider heritage area" that was identified by the Board of Inquiry into the Basin Bridge Proposal; and, therefore, the same need to assess the adverse effects of the proposal on this "wider heritage area" exists.'*

The Review's conclusions include that:

¹ I note that in relation to the use of the term 'significant', all historic heritage buildings identified in the ODP are 'significant', in that Policy 20.2.1.1 requires that the Council: 'Identify, record and list the city's significant historic heritage'.

² Paragraph 781

- Whilst the development does not require consent under the District Plan's heritage rules, because parts of the proposed development are well in excess of the existing District Plan height controls for the site, the effect of this building height on the historic heritage values of any listed heritage item in the vicinity must be considered.
- The proportions of solid wall to window and the uniformity of the proposed brick cladding of the terraced housing on the corner of Buckle and Tasman Streets could be more finely detailed to respond to the finer proportions of the former Police Station which would help to better integrate this part of the development into the context of the site and the surrounding environment.
- From the west, the height and bulk of the north tower are broken up by vertical and horizontal stepping ("rifting") and variation in materials. The terraces help to create a scale transition that would not be achieved if the north tower was built to the street edge; and the topography of both the Park and the development site mean that the north tower does not become the primary feature from within Pukeahu Park, despite its height.
- Nevertheless, the proposed development still dominates heritage items in the vicinity from certain viewpoints.
- The former National/Dominion Museum and National War Memorial and Carillon were composed and built in conjunction. Together, they are a significant landmark sited on the northern slopes of Pukeahu and visible from many parts of the city and the hills around. The landmark status of these buildings – particularly the Carillon tower – and the relationship between them are obscured and diminished by the proposed development when viewed from the east. The skyline along Pukeahu ridge would be permanently altered by the proposal. The towers interrupt viewshafts that, while they are not formally protected features, may be regarded as important established views with some significance in the overall heritage landscape.
- Further, the Carillon tower is partially – and in some cases entirely - obscured from view from key vantage points such as Ellice Street, the intersection of Buckle and Ellice Streets with Kent and Cambridge Terraces, and within the Basin Reserve.
- From these perspectives the proposal does not respect the symbolic status of the Carillon and National War Memorial.
- The proposal is not supported on heritage grounds.

4. The Relevance of the Final Report and Decision of the Board of Inquiry into the Basin Bridge Proposal

Both the Archifact Report and WCC Review make reference to the Final Report and Decision of the Board of Inquiry into the Basin Bridge Proposal (Board Decision). To an extent the WCC Review relies upon the Board Decision as justification of their consideration of the impact of the proposed development on views from the east towards the National War Memorial and Carillon.

Having worked my way through the key parts of the Board Decision, I recognise that there are a number of points raised in the decision which are of relevance to the assessment of the One Tasman application.

Historic Heritage and the Significance of Surroundings Associated with the Natural and Physical Resource

The Board of Inquiry make reference to the RMA definition of historic heritage³: and in particular notes that historic heritage includes both natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures and those 'surroundings associated with the natural and physical resources'.

In relation to this, the Board Decision notes:

[557] The protection given by Section 6(f) extends to the curtilage of the heritage item and the surrounding area that is significant for retaining and interpreting the heritage significance of the heritage item. This may include the land on which a heritage building is sited, its precincts and the relationship of the heritage item with its built context and other surroundings.

[558] Importantly, for this matter, we are guided by the Supreme Court in King Salmon as to the application of the word inappropriate as it is used in Section 6(f). Where the term inappropriate is used in the context of protecting historic heritage, the natural meaning is that inappropriateness should be assessed by reference to what it is that is being protected. That is, within the context of the heritage elements that exist within and around the Basin Reserve area, their value and the effects of the project on those values.

The Board Decision further notes that:

[614] Some heritage experts have chosen to focus their assessments on individual heritage items, particularly listed or registered items, while others give attention to considerations of heritage setting as well. With reference to terminology, this is partly a distinction between built heritage and historic heritage.

[615] In defining historic heritage, the RMA makes a clear distinction between historic sites and historic heritage. At their conferencing, the experts drew attention to the definition of historic heritage in the RMA - which includes (b)(iv) surroundings associated with the natural and physical (historic heritage) resources.

[623] We agree that we are obliged to consider the effects on historic heritage and that historic heritage includes not only built heritage but the surroundings and setting in which the built heritage exists. In our view, the explicit focus of the Transport Agency, Wellington City Council and Heritage NZ heritage assessments on built heritage, as distinct from historic heritage, unduly limited the scope of those assessments.

Based upon my interpretation of the view of the Board of Inquiry there is an obligation to:

³ RMA Section 2(1)

- Form an understanding of the heritage area of interest around the proposed development and the values associated with that.
- Consider the effects of the proposed One Tasman Pukeahu Park development on the identified values.

What is the 'Wider Heritage Setting' and what values are associated with this?

The WCC review indicates

'However, the proposed development is in the middle of a wider heritage setting that was identified in the Final Report and Decision of the Board of Inquiry into the Basin Bridge Proposal as extending from Taranaki Street in the west to Government House in the east, taking in all of those heritage items identified above, as well as the Basin Reserve Historic Area.1 Therefore, the impact of the proposal on this wider setting, (and not just the setting to the west) needs to be considered.'

The wider heritage setting identified by the Board of Inquiry was an area which clearly provided a setting to the Basin Reserve area, consisting of areas which were directly adjacent to the Basin Reserve, or directly connected to the Basin Reserve. This included:

- The Mount Victoria suburb, which immediately adjoins the Basin Reserve, and which would be physically impacted by planned works.
- The National War Memorial Park which directly links to the Basin Reserve area.
- The southern section of Kent and Cambridge Terraces which interfaces with the Basin Reserve.
- Government House, which is accessed from the Basin Reserve.
- The Home of Compassion Creche, which directly interfaces with the Basin Reserve.

I do not consider that it can be assumed that the proposed One Tasman development has the same wider heritage setting as the Basin Reserve proposal, as suggested in the WCC Review. The current application relates to the development of a different site to that considered in the Board Decision. To ensure that the appropriate wider heritage setting is considered it is appropriate that it be determined on a case-by-case basis.

In this case, the National War Memorial Park and National War Memorial 'Area' (including the National War Memorial and Carillon, Former National/Dominion Museum, Mount Cook Police Station and retaining wall etc) are directly adjacent to the site, and the Basin Reserve is only separated by half a block of development. I consider that these areas are therefore clearly identifiable as part of the wider heritage setting of the application site.

However, the Mount Victoria area is more distant from the application site and is separated from the application site by the Basin Reserve and Cambridge/Kent Terraces. The Mount Victoria area does not have a direct relationship with the application site and is not directly impacted by the proposed development (all be it that there would be some impact on views of the Carillon from the Mount Victoria area). I do not therefore consider that the Mt Victoria residential area is part of the wider heritage setting of the site.

I consider that my view is supported by examples of how the Board Decision considered the effect of the Basin Reserve development on the wider heritage setting. For example, in relation to the Mt Victoria Special Character Area, the Board Decision considered only matters which stemmed from the very close relationship of the Mt Victoria area to the Basin Reserve:

713 (b) Severance of the Basin Reserve from the residential northeastern segment of its heritage setting:

[i] Will the Basin Bridge structure disrupt historically significant views of the Basin Reserve from Mt Victoria residences?

[ii] Will the Basin Bridge structure dominate the nearby part of the Character Area, resulting in loss of heritage value?

[iii] Will the Basin Bridge structure separate the residential northeastern segment of the wider heritage setting from the Basin Reserve Historic Area and disrupt historical patterns of development in this locality?

In view of this I consider that it would be tenuous to suggest that the Mount Victoria area forms part of the wider heritage setting of the proposed development.

The values of each of Basin Reserve, National War Memorial Park, National War Memorial Area and Basin Reserve are clearly articulated in the Archifact Report, WCC Review and the Board Decision.

5. Is the Central Area Urban Design Guide Appendix 2 – Te Aro Corridor (Ta) being correctly utilised in the Assessments?

Both the Archifact Report and WCC Review make reference to the Central Area Urban Design Guide Appendix 2 – Te Aro Corridor (the TA Design Guide).

The stated intention of the TA Design Guide is to *‘To integrate the Bypass into the urban fabric of southern Te Aro as an active city street’*.

It states that it will *‘...assist the design of new development along the Bypass so that this street contributes to the quality, as well as the accessibility, of the city.’*

It is very clear from the stated intention that the guide has been included in the ODP as a means to influence the local effects of development alongside the bypass route.

Given this clearly stated intention and the other supporting paragraphs, I do not consider that the TA Design Guide is being appropriately used in the WCC Review.

In particular, the TA Design Guide sets out Objectives and Guidelines for a number of identified areas along the bypass route, including *‘The National War Memorial Area’*. These are referenced in the WCC Review in relation to Policy 12.2.4.5 *‘Ensure that development within the Te Aro Corridor assists to integrate the inner city bypass in to the urban fabric of southern Te Aro.’*

- *‘Objective TA(O1.1) To retain the landmark significance of the Carillon and National War Memorial, and respect its symbolic status’* is referenced in the WCC Review in considering views of the Carillon and National War Memorial from the eastern part of Pukeahu Park, and from the wider Wellington context including from the east and from the Mt Victoria Tunnel.
- *‘Objective (TA) O1.2 To maintain an unobstructed ridge-top setting for the National War Memorial and good visual connections with the city.’* Is referenced in relation to views from the east

I consider that the consideration of views from wider locations (which fall outside of the boundary of the Design Guide) fall outside of the intention of the TA Design Guide. I also consider that they do not fall within the scope of matters to be considered under Policy 12.2.4.5 (which like the TA Design Guide appears to relate specifically to the integration of development along the bypass corridor).

Given this, I do not consider that it is appropriate to utilise Policy 12.2.4.5 or the TA Design Guide as a means to assess the impact of the proposed development on views of the Carillon and National War Memorial from wider locations, including the Mt Victoria residential area.

6. Assessment of Wellington District Plan Objectives and Policies

The proposed development is assessed below against relevant policies and objectives of the Operative Wellington District Plan; that is those policies and objectives which relates to the impact of the proposed development on its wider heritage setting.

An assessment of relevant Objectives and Policies of the Proposed Wellington District Plan is provided in Section 7 of this report.

Whilst the AEE has been consulted as a means to identify relevant objectives and policies, this assessment, and the assessment of the PDP included in Section 7, have been prepared without direct reference to either the Archifact Report or WCC Review.

Note: The assessments in Section 6 and Section 7 are not intended to be a full assessment under s104D(1)(b) or s104(1)(b)(vi), recognising that these should provide a broader assessment against the Plan than is provided here.

Number	Objective/Policy	Assessment
<p>OBJ 12.2.3 Urban Form & Sense of Place</p>	<p>To recognise and enhance those characteristics, features and areas of the Central Area that contribute positively to the City's distinctive physical character and sense of place.</p>	<p><i>There are a number of significant historic heritage items within the wider heritage setting of the proposed development.</i></p> <p><i>National War Memorial and Carillon and Former National/Dominion Museum</i> – <i>The development is located to the east of these, on lower ground and separated by Tasman Street.</i></p> <p><i>Whilst the proposed development is taller than the ODP (and emerging PDP) height limits, when viewed from the National War Memorial Park area, it will appear well separated from the National War Memorial and Carillon and Former National/Dominion Museum, by distance and the visual break provided by the trees within the Memorial/Museum site and by Tasman Street.</i></p> <p><i>Basin Reserve</i> - <i>There are no Viewpoints identified in the ODP which pass over/through the site from the east (either to or from the National War Memorial and Carillon and Former National/Dominion Museum). However, as discussed above, I consider that the Basin Reserve is within the wider heritage setting of the proposed development.</i></p> <p><i>From the Basin Reserve area there will undoubtedly be impacts on views of the National War Memorial and Carillon and Former National/Dominion Museum. However, the creation of two blocks, with a viewing corridor between them would have a lesser effect on this view and is a preferable outcome to the alternative of lower buildings which present a longer, uninterrupted horizontal built form, which would be at odds with the vertical emphasis of the Carillon.</i></p>

		<p>National War Memorial Park, including Mount Cook Police Station and retaining wall, Brick Wall, Home of Compassion Creche, Former Army Headquarters Building – the proposed setback of the tower from the frontage to this area and the construction of lower scale buildings along the street frontage is an appropriate response to this area, which responds to the expectations of the Te Aro Urban Design Guide and ensures that the Carillon and National War Memorial retain their landmark significance and ensures that the National War Memorial retains its uninterrupted ridge-top setting, recognising the relationship of this to Central Area Viewshafts No. Vs 21 (although noting that this relates to a viewshaft towards the inner harbour and western escarpment).</p>
POL 12.2.3.2	Promote a strong sense of place and identity with different parts of the Central Area.	<p><i>The local area already has a strong sense of place, on the whole formed by the wider heritage setting of the site.</i></p> <p><i>Whilst the development is large, as described above, it has been designed to minimise its effects on the existing sense of place created by the National War Memorial and Carillon and Former National/Dominion Museum, National War Memorial Park, including Mount Cook Police Station and retaining wall, Brick Wall, Home of Compassion Creche and Former Army Headquarters Building, and existing at the Basin Reserve.</i></p> <p><i>The existing sense of place of these areas will remain dominant and will not be adversely affected by the proposed development.</i></p>
OBJ 12.2.4 Sensitive Development Areas	To ensure that any future development of large land holdings within the Central Area is undertaken in a manner that is compatible with, and enhances the contained urban form of the Central Area.	<p><i>Having considered Policy 12.2.4.5 below, it is clear that the proposed development achieves this objective from a historic heritage perspective.</i></p>
POL 12.2.4.5	Ensure that development within the Te Aro Corridor assists to integrate the inner city bypass into	<p><i>As described above, the proposed development appropriately responds to the expectations of the Te Aro Urban Design Guide and ensures that the Carillon and National War Memorial retain their landmark significance, ensures that the National War Memorial retains its uninterrupted ridge-top setting and</i></p>

	the urban fabric of southern Te Aro.	<i>provides an enhanced built edge to Buckle Street (National War Memorial Park).</i>
OBJ 12.2.5 Effects of New Building Works	Encourage the development of new buildings within the Central Area provided that any potential adverse effects can be avoided, remedied or mitigated.	<i>Having considered Policies 12.2.5.1 to 12.2.5.4 below, it is clear that the proposed development achieves this objective from a historic heritage perspective.</i>
POL 12.2.5.1	Manage building height in the Central Area in order to: reinforce the high city/low city urban form; and ensure that new buildings acknowledge and respect the form and scale of the neighbourhood in which they are located; and achieve appropriate building height and mass within identified heritage and character areas.	<i>Whilst the development exceeds the building heights for the area, the effects of this on its wider heritage setting are mitigated by the overall design and layout of the scheme. As discussed above, the placement of the towers and the gap between them, and the provision of lower scale buildings on the frontage of the site to the National War Memorial Park, ensures that the heritage values of the wider heritage setting is maintained.</i>
POL 12.2.5.2	Manage building mass to ensure that the adverse effects of new building work are able to be avoided, remedied or mitigated on site.	<i>The utilisation of two towers, rather than a single large mass, assists with reducing the apparent bulk and mass of the development. The heritage values of the wider heritage setting are maintained.</i>
POL 12.2.5.3	Manage building mass in conjunction with building height to ensure quality design outcomes.	<i>As described above, the utilisation of two (over-height) towers, rather than a single large mass, assists with reducing the apparent bulk and mass of the development. The placement of the towers and the gap between them, and the provision of lower scale buildings on the frontage of the site to the National War Memorial Park ensures that the heritage values of the wider heritage setting is maintained.</i>
POL 12.2.5.4	To allow building height above the specified standards in situations	<i>Whilst the development exceeds the building heights for the area, the effects of this on its wider heritage</i>

	<p>where building height and bulk have been reduced elsewhere on the site to:</p> <ul style="list-style-type: none"> - provide an urban design outcome that is beneficial to the public environment; or - reduce the impact of the proposed building on a listed heritage item. <p>Any such additional height must be able to be treated in such a way that it represents an appropriate response to the characteristics of the site and surrounding area.</p>	<p><i>setting are mitigated by the overall design and layout of the scheme.</i></p> <p><i>As discussed above, the placement of the towers and the gap between them, and the provision of lower scale buildings on the frontage of the site to the National War Memorial Park ensures that the heritage values of the wider heritage setting are maintained.</i></p>
OBJ 12.2.6 Buildings and Public Amenity	<p>To ensure that new building works maintain and enhance the amenity and safety of the public environment in the Central Area, and the general amenity of any nearby Residential Areas.</p>	<p><i>As set out in the assessments below and above, the proposal appropriately responds to its wider heritage setting.</i></p>
POL 12.2.6.2	<p>Require high-quality design that acknowledges , and responds to, the context of the site and the surrounding environment.</p>	<p><i>As set out above, the local area already has a strong sense of place, on the whole formed by the wider heritage setting of the site.</i></p> <p><i>Whilst the development is large, as described above, it has been designed to minimise its effects on the existing sense of place created by the National War Memorial and Carillon and Former National/Dominion Museum, National War Memorial Park, including Mount Cook Police Station and retaining wall, Brick Wall, Home of Compassion Creche and Former Army Headquarters Building, and existing at the Basin Reserve.</i></p>

		<p><i>The existing sense of place of these areas will remain dominant and will not be adversely affected by the proposed development.</i></p> <p><i>In view of this, the proposal appropriately responds to the context of the site and the surrounding environment.</i></p>
POL 12.2.6.3	<p>Ensure that new buildings and structures do not compromise the context, setting and streetscape value of adjacent listed heritage buildings, through the management of building bulk and building height.</p>	<p><i>As set out above, this would be achieved.</i></p>

7. Assessment of Proposed Wellington District Plan Objectives and Policies

The proposed development is assessed below against relevant policies and objectives of the Proposed Wellington District Plan; that is those policies and objectives which relate to the impact of the proposed development on its wider heritage setting.

Number	Objective/Policy	Assessment
Objective CCZ-05 Amenity and design:	Development in the City Centre Zone positively contributes to creating a high quality, well-functioning urban environment, including: <ol style="list-style-type: none"> 7. Acknowledging and sensitively responding to adjoining heritage buildings, heritage areas and areas and sites of significance to Māori. 	<p><i>This objective relates specifically to adjoining heritage buildings and heritage areas (and does not extend to include consideration of effects on the Mount Cook area).</i></p> <p><i>As described above in relation to ODP OBJ 12.2.3, there are a number of significant historic heritage items within the wider heritage setting of the proposed development, with the National War Memorial and Carillon and Former National/Dominion Museum, and the National War Memorial Park, including Mount Cook Police Station and retaining wall, Brick Wall, Home of Compassion Creche, Former Army Headquarters Building.</i></p> <p><i>The effects of the proposed development on these are assessed above.</i></p> <p><i>Based on this assessment, the effects on these would be less than minor.</i></p>
Objective CCZ-07 Managing adverse effects	Adverse effects of activities and development in the City Centre Zone are managed effectively both: <ol style="list-style-type: none"> 2. At interfaces with: <ol style="list-style-type: none"> a. Heritage buildings, heritage structures and heritage areas; 	<p><i>As described above in relation to PDP Objective CCZ-05 (and ODP OBJ 12.2.3 and OBJ 12.2.5), there are a number of significant historic heritage items within the wider heritage setting of the proposed development.</i></p> <p><i>As concluded above, any potential adverse effects of the proposed development can be avoided, remedied or mitigated and overall the effects of the proposed development on historic heritage would be less than minor.</i></p>
Policy CCZ-P9 Quality design outcomes	Require new development, and alterations and additions to existing development, at a site scale to positively contribute to the sense	<p><i>This matter is discussed above, specifically in relation to ODP POL 12.2.6.2. where I conclude that the proposal appropriately responds to the context of the site and the surrounding environment.</i></p>

	<p>of place and distinctive form, quality and amenity of the City Centre Zone by:</p> <p>2. Ensuring that development, where relevant:</p> <p>a. Responds to the site context, particularly where it is located adjacent to:</p> <p>ii. A heritage building, heritage structure or heritage area;</p>	
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The Design Guide - Centres and Mixed Use includes relevant guidance. The Design Guide seeks to guide best practice design approaches and encourage built outcomes that both support the District Plan objectives and meet the Design Guides' overarching principles and outcomes.

Relevant Guidelines from the Design Guide are considered below:

Number	Guideline	Assessment
<p>Responding to the natural environment</p> <p>Responding to whakapapa of place</p>	<p>G2. Identify and respond to the natural and cultural landscape within and surrounding the site, including but not limited to:</p> <ul style="list-style-type: none"> » Māori sites of significance and their traditional uses. » Identified view shafts to maunga and awa/moana of significance to mana whenua. » Native vegetation and planting. » Scheduled heritage places. 	<p><i>This Guideline sits under a heading relating to the Natural Environment. The scheduled heritage places within the local area are not recognised for their significance as natural features.</i></p> <p><i>Notwithstanding this, as set in the ODP and PDP assessments above, the proposal appropriately responds to the context of the site and the surrounding environment and its effects on historic heritage would be less than minor.</i></p>

<p>Effective public-private interface</p> <p>Ground floor interface and frontage</p>	<p>G28. Consider the scale of adjacent heritage buildings and areas in the design.</p> <p><i>Adopt street wall heights, upper-level setbacks and appropriate building separation to respond to the scale of adjacent heritage buildings and contributing buildings to heritage areas</i></p>	<p><i>As discussed above, the placement of the towers and the gap between them, and the provision of lower scale buildings on the frontage of the site to the National War Memorial Park is an appropriate response to the scale of the adjacent heritage buildings and will ensure that the heritage values of the wider heritage setting is maintained.</i></p>
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8. Overall Conclusion and Recommendations

Having visited the site, considered the proposed plans, Archifact Assessment and WCC Review, I consider that the proposed development will maintain the values of its wider heritage setting. Overall, the effects of the proposal on historic heritage will be less than minor.



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29th January 2023

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