

## **Annexure 2**

Urban Design Advisor Assessment

Sarah Duffell

In the matter of The Resource Management Act 1991  
and  
In the matter of Land use resource consent under the Wellington City Council Operative District Plan for the construction of two new buildings at 1 Molesworth Street in the Parliamentary Precinct.  
By Simpson Grierson on behalf of Parliamentary Services

**STATEMENT OF EVIDENCE OF  
SARAH DUFFELL (URBAN DESIGN)  
ON BEHALF OF WELLINGTON CITY COUNCIL  
20 January 2023**

## 1.0 INTRODUCTION

- 1.1 My name is Sarah Duffell; I am employed by Wellington City Council in the position of Senior Urban Design Advisor RMA in the Urban Design team. My main task in this role is to undertake urban design assessment of resource consent applications against the design-related provisions of the District Plan.
- 1.2 I have a Bachelor's degree in Regional Planning with Honours (Massey University), and a Master of Arts in Urban Design with Merit (University of Westminster). I have 19 years of experience as an urban designer, mostly within the field of design review. This is preceded by ten years of experience as a planner in both New Zealand and the UK.

## 2.0 BACKGROUND

- 2.1 This report provides advice on urban design aspects of the proposal by His Majesty the King to construct two new buildings for government purposes behind the existing Parliament House building. The applicant describes the proposal as:

*"The main aspects of the proposal are:*

- *A new Parliamentary building (MUS) will be constructed to the rear of Parliament House. The new building (MUS) will be linked to Parliament House by a proposed first floor bridge to provide efficient, safe and covered pedestrian linkage directly to the Debating Chamber.*
- *An existing oak tree located at the rear of Parliament House will be relocated on the Precinct to make way for the proposed MUS building.*
- *The MUS building will be constructed to IL4 seismic resilience standard and with plant and other facilities so that it is self-sufficient (in terms of power, water supply etc). This is to enable essential Parliamentary functions to be continued after a major natural disaster. It will also enable the option to relocate into MUS the National Crisis Management Centre which is currently located in IL3 floorspace at the base of the Beehive.*
- *A new building will be constructed on the Ballantrae Place frontage of the Precinct (BAL) primarily to manage all incoming and outgoing deliveries for the Precinct, thereby enhancing the safety and security of the Precinct. It will also accommodate fixed plant to serve the Precinct.*
- *Associated with MUS and BAL is the proposed removal of existing surface car parking at the rear of Parliament House and the Executive Wing and replacement with pedestrian centred plaza and landscaping, thereby positively transforming this existing "backyard" of the Precinct and enhancing pedestrian connections and amenity.*
- *Necessary for the proposal will be some earthworks, including the removal to a consented landfill of approximately 24,000m<sup>3</sup> of surplus excavated material, and the construction of services/infrastructure. The nature, scale and extent of the proposed works are contained in the "Three Waters and Earthworks" report appended to this AEE.*

*The proposed additional floorspace on the Precinct will enable existing floorspace within Parliament House to be reallocated to activities and facilities to promote to the public the history of Parliament and its operation. This important Parliamentary role is currently significantly constrained by the shortage of floorspace on the Precinct.*

*Parliament has set environmental sustainability goals for its activities on the Precinct. To achieve these, additional fixed plant is necessary. This has been co-located as much as possible with the*

*proposed MUS and BAL buildings. Some small above ground utility cabinets may be required by the service providers but this is subject to detail design.”<sup>1</sup>*

- 2.2 I am familiar with this part of Wellington City. I have visited the application site and general area on numerous occasions since the application was first lodged, most recently on January 11 2023.
- 2.3 I have reviewed the application lodged in August 2022. The application includes a comprehensive Urban Design assessment, and several other documents that are relevant to Urban Design assessment of this proposal. Documents reviewed include:
- Architectural Drawings for Resource Consent, Future Accommodation Strategy by Studio Pacific Architecture, Ref: 2650 dated September 2022 (including plans P A0 visualisations, P A1 Existing (EXT), P A2 Proposed Landscape (LAN), (P A3 (removed)), P A4 Proposed Museum Street Building (MUS), P A5 Proposed Ballantrae building (BAL) and P A6 Supporting Information)
  - Supplements: Sun Studies by Studio Pacific Architecture, Plans titled A6 SK-001 – SK-008
  - Design Statement for Future Accommodation Strategy by Studio Pacific Architecture (Davis/Brixton), Issue 20220920: Revision C
  - FAS Urban Design Assessment by McIndoe Urban dated 27 September 2022
  - FAS Crime Prevention through Environmental Design assessment by Boffa Miskell, September 2022
  - Feedback from Wellington Architectural Centre, 29 July 2022
- 2.4 I have given consideration to the contents of the heritage reports and the arborist’s reports.
- 2.5 I have reviewed the five submissions received, most particularly those that comment on matters related to urban design.
- 2.6 The site is zoned ‘Central Area’ and is also covered by the Parliamentary Precinct Heritage Area. Any proposals for development in this Precinct are assessed against the Central Area Urban Design Guide (CADG) with particular reference to the location-specific guidelines of the Parliamentary Precinct Heritage Area (PPHA) appendix.
- 2.7 Both the Beehive and Parliament House have notations as heritage buildings in the District Plan, and there is a listed oak tree to the west of these buildings which this proposal would affect. All locations under consideration are contained within the Parliamentary Precinct Heritage Area. This proposal is also being reviewed for separate comment by an advisor from the Cultural Heritage Team.
- 2.8 The area is also subject to three protected viewshafts in the Operative District Plan: Viewshafts 1, 4 and 4a.
- 2.9 The proposal has been the subject of a number of pre-application meetings, all of which I have attended and for which I have provided written feedback.
- 2.9 For the purpose of this report the following abbreviations are used:
- MUS Proposed Museum Street Building
  - BAL Proposed Ballantrae Building
  - PH Parliament House
  - ODP Operative District Plan
  - PDP Proposed District Plan

---

<sup>1</sup> AEE, pages 4-5

- CADG Central Area Design Guide
- PPHADG Parliamentary Precinct Heritage Area Design Guide
- CPTED Crime Prevention through Environmental Design
- WCC Wellington City Council

### **3.0 ASSESSMENT**

3.1 The application includes a variety of supporting material related to urban design assessment. If there is agreement between the WCC Urban Design advisor and the applicant's Urban Design assessment, the RMA allows the option of WCC adopting that part of their report. Due to the volume of material being considered this option will be exercised where practical.

#### **3.2 Central Area Design Guide**

3.2.1 The report by Mr McIndoe, the applicant's Urban Design advisor, is thorough and generally agreeable. My position is therefore to recommend that it is adopted and therefore becomes representative of the Council's own views, subject to including the additional views below.

3.2.2 The report by Mr McIndoe includes at Appendix 1 a detailed assessment against the Central Area Design Guide. In addition to his assessment, the following points should be noted:

##### **Section 1 Design Coherence**

The applicant's assessment is agreeable and can be adopted.

##### **Section 2 Relationship to context**

The applicant's assessment is generally agreeable, and can be adopted with the following additional points made:

O2.1 It is my opinion that the existing car park space that is the proposed site of the MUS building can currently be considered a low-quality environment with few redeeming urban design features and an undistinguished sense of place. The setting for the listed oak tree is poor, presenting a mature tree standing in an isolated setting. Pedestrian access quality and CPTED conditions in and around this part of the site are poor. The new development will enhance the space, improve the setting for the tree and provide better ground-level conditions for people.

G2.1 The proposal maintains consistency with patterns of siting and compositional logic but introduces contrast in architectural form and style. This is acceptable because of the significance of the building and the uniqueness of the function it serves within the Wellington city context. It is also acceptable because it continues the narrative of development of government activities on the site from the 19<sup>th</sup> century to the present day.

G2.2 Positive precedents referred to are the strong compositional references of the adjacent buildings and the decision to provide a seismically superior structure in an environment of known risk. References to Māori heritage and culture in the design are also highly positive.

G2.3 Consistency via compositional coherence with adjacent buildings is evident.

##### **Section 3 Siting, height, bulk and form**

The applicant's assessment is generally agreeable, and can be adopted with the following additional points made:

O3.2 The MUS and BAL buildings will have little direct impact on the Beehive in terms of detracting from its essential qualities of setting or architecture. The regard given to the listed oak tree in terms of proposing its relocation is agreeable. It will be part of a nicer, more considered vegetated setting in the new location.

- G3.5 The requirement for enhanced seismic resistance has to some extent dictated the shape of MUS, requiring it to have a box-like form with consequent reduced opportunity for transition in scale or form. Exterior detailing will, to a small extent, visually soften the linear parapet and boxy shape of the building.
- G3.11 Wind effects have not been assessed. Mr McIndoe states *“If elevated wind speeds occur in the West Courtyard, mitigation – using trees or constructed shelters – will need to avoid crowding the heritage oak or splitting the courtyard longitudinally”*.<sup>2</sup> I agree with this position, and consider that should any modification be required to the landscaping or layout of the courtyard, this should be subject to further review by the WCC Urban Design Team. This matter would be suitable for inclusion as a consent condition.

#### **Section 4 Edge treatment**

The applicant’s assessment is generally agreeable, and can be adopted with the following additional point made:

- G4.8 Broadly this statement is fine, but the design of the columns of the link bridge are potentially an issue in terms of creating a safe, inclusive environment. As shown they are a double-pole structure but with the outer poles not reaching to ground level, possibly creating visual confusion and a physical hazard (see image below).

However, the opportunity for further enhancement of the bridge and other items as the design is finalised is noted. A condition can therefore be included requiring the final design of this to be submitted for UD approval, with the applicant requested to note the above concerns.



*Figure 4.6 Raised terrace at the end of Museum Street with ramp at left and steps beyond leading up towards Hill Street.*

3

#### **Section 5 Façade composition and building tops**

The applicant’s assessment is generally agreeable, and can be adopted with the following additional points made:

<sup>2</sup> Urban Design report, page 54

<sup>3</sup> Urban Design report, page 36

- O5.2 Removal and modification of the fabric of the heritage-listed Parliament House is not an optimal outcome, which is not entirely justified on the grounds of elevated link bridges being an access response seen elsewhere within the precinct. The difficulty of an underground link due to seismic condition differences between MUS and PH is appreciated, however it should be noted this would be a better outcome for heritage. Ideally the proposal would not involve destruction of heritage fabric but in terms of urban design outcomes, the response provides sheltered access between the buildings and the location and of the proposed link has been carefully considered.
- G5.8 The matter of MUS building intruding into Viewshaft 4a is discussed in a later section of this report.

## **Section 6 Materials and Detail**

The applicant's assessment is generally agreeable, and can be adopted with the following additional points made:

- O6.2 As per comments above on O5.2.
- G6.1 References to both the building's structural elements and patterns and motifs of Māori art and culture is noted.
- 3.2.3 Mr McIndoe's report makes the following conclusions in respect of assessment against the Central Area Urban Design Guide. I agree with these conclusions.
- "In summary, the proposal satisfies the requirements of the design guide in an exemplary way:*
- *A high level of design coherence is critical given the architectural, heritage and cultural value of the Parliamentary Precinct. Coherence has been achieved with this proposal.*
  - *MUS, BAL and associated open spaces respect their unique context. Most notably, they do so by referencing the compositional logic of existing buildings within the parliamentary complex.*
  - *MUS gives clearer spatial definition and a more finished character to Museum Street.*
  - *Building height, bulk and form achieve a positive relationship with adjoining buildings and open spaces.*
  - *MUS presents carefully made frontages to Museum Street and the new West Courtyard. High-quality architecture and improved spatial definition dispel the current back-of-house condition.*
  - *Roofs are recessive features on MUS and BAL.*
  - *Visual modules are expressed three-dimensionally through the layering of structure, glazing (with decorative ceramic frit) and external tubular lattice. Units of composition vary in size and sometimes shape. All are well-proportioned and come together in sophisticated arrangements.*
  - *Façade articulation delivers an appropriate level of visual interest. At the same time, the combination of simple architectural volumes and bold repetitive modules relates positively to more grandly-scaled neighbours.*
  - *Materials and detailing are resolutely contemporary in style. High-quality architecture helps the new structures to integrate with heritage buildings from several eras."*
- 3.2.4 The proposal is considered to meet the Central Area Design Guide. Any other matters are commented on above, and conditions would be able to cover the remaining matters which require further consideration, refinement or control.

## **3.3 Parliamentary Precinct Heritage Area Design Guide.**

- 3.1 The PPHA guidelines state:



*The Parliamentary Precinct heritage area is nationally significant. It is one of the most important historic precincts in the country and features perhaps the best known group of buildings in the country. The area, through its site and buildings and longstanding governmental history, exemplifies the political and social history and development of New Zealand.*

- 3.2 The Heritage Advisor for WCC will also give detailed comment about the values and significance attached to this Precinct. Of note for urban design consideration is the description of the extent of the Precinct, with this stating:

*“At the rear of the Parliamentary buildings, the boundary line is drawn along the common property line to the adjoining state service buildings and incorporates the entirety of Museum Street and the sculpture park on the site of the former Broadcasting House. This will enable any future development of the present car-park to be managed in a way that does not adversely affect the heritage values of the area”.<sup>4</sup>*

- 3.3 Mr McIndoe also carries out an assessment of urban design-related matters against the PPHADG, included as Appendix 2 to his report.
- 3.4 Each of the objectives and policies of the guide are now considered in turn from the perspective of Urban Design assessment, with additional comments as required to address any matters of Mr McIndoe’s assessment.

### **Objectives**

***O1.1 To ensure that the Parliamentary Precinct Heritage Area’s buildings and structures are retained and conserved.***

The proposal retains all the current buildings and structures within the Precinct, choosing an additive approach to increasing the amount of office space on the site.

The Heritage Advisor will comment on the extent to which the objective of ‘conservation’ of buildings and structures is achieved.

Relocation of the existing listed oak tree can be supported, and the proposed new location would be an agreeable outcome in terms of urban design considerations and enhancing the spaces around the buildings. This feasibility of this exercise will be more appropriately commented on by an arborist.

***O1.2 To ensure that the dignified open spaces at the front of Parliament buildings are retained and enhanced.***

No development is proposed in the area in front of Parliament buildings. This objective is achieved.

***O1.3 To ensure that there is minimal impact on the immediate setting of the area by buildings and structures on adjacent land.***

Not applicable.

***O1.4 To ensure continuity of public access to the formal forecourt area in front of Parliament buildings.***

This objective is achieved, no change is proposed to the design of or access to the formal forecourt area which will be able to function in the manner it does at present. The proposal also improves the quality of pedestrian access around the wider site by modifying an area

---

<sup>4</sup> CADG Appendix 3 – Heritage Areas, page 4



currently used for car parking with a pedestrian-focused landscaping plan that integrates with other spaces on and around the site, including the forecourt area.

## **Guidelines**

- G1.1** *No heritage building should be altered externally, except to reinstate lost features or remove non-contributing fabric. There should be no interruption of original rooflines, parapet lines and elevations in this area.*

The proposal does not meet this guideline as it requires alteration of the western elevation of Parliament House to accommodate the link bridge. The matter of external alteration of heritage fabric on this elevation will be commented on by the Heritage Advisor.

The guideline does not specify whether ‘interruption’ of original rooflines or parapets is physical or visual. No physical modification is proposed to these elements of PH or the Beehive, but there will be visual interruption of Parliament House rooflines and parapet lines resulting from the introduction of a new building into the context. The compatibility of the building with the context is discussed previously.

- G1.2** *Locate any new buildings in Parliament Grounds at the rear of Parliament Buildings, the Beehive and the Parliamentary Library.*

This guideline is met.

- G1.3** *Maintain Museum Street as a formed space between the existing buildings and any new buildings; and maintain the pedestrian access between Hill St and Bowen Street.*

This guideline is met, and Mr McIndoe’s comments should be noted in support.

- G1.4** *General sight lines to, from and around the area and the associated open spaces and wherever possible enhanced.*

Both proposed buildings will introduce forms into a previously unbuilt space, but this space currently has low amenity quality. The new proposal has specifically considered views and sightlines, and responded to protecting or enhancing these with the proposed building designs. Mr McIndoe’s comments on this matter are also agreeable.

- G1.5** *Assess any proposed new buildings on immediately adjacent land to ensure they will not have adverse effects on the wider setting of the area.*

The possible effects a new building can have on a wider setting relate to siting, height, bulk, form and external appearance, while the effects that may be created as a result of the above include matters such as alteration to sunlight access or shading, or changed wind conditions. (I disagree with Mr McIndoe’s position that this guideline is not applicable.)

The siting, height, bulk, form and external appearance have been considered previously in this report. Sunlight access has also been discussed, and is further considered in Section 5 of this report which responds to submissions. The possible alteration of wind conditions around the existing precinct has been covered above.

- G1.6** *Encourage the removal of visually and aesthetically discordant features, e.g. underground car-parking entries.*

The MUS building will have underground parking entry in a context-compatible location. The proposal will also remove a surface-level car park and replace it with a building surrounded by landscaped space intended for pedestrian access.

- G1.7** *Any proposed changes to the general layout of Parliament Grounds on the Molesworth Street elevation, should be undertaken to enhance the existing values of the area.*

Not applicable. There will be no modification to the layout of Parliament ground on the Molesworth Street side of the site.

**G1.8** *Any necessary security measures should take into account traditional public access and views both to and from the front of Parliament.*

As stated, there will be no alteration to the front/eastern side of the site. Additionally, construction of the Ballantrae Building will remove any security risk of inbound goods and services to a discrete location on the site. This is beneficial for the security and ongoing protection of the both the existing Beehive Building and the wider site.

**G1.9** *Consider the possibility of uncovering archaeological material when any earthworks or subsurface investigation are planned.*

The applicant has applied for, and had granted, an Archaeological Authority by Heritage New Zealand/Pouhere Taonga.

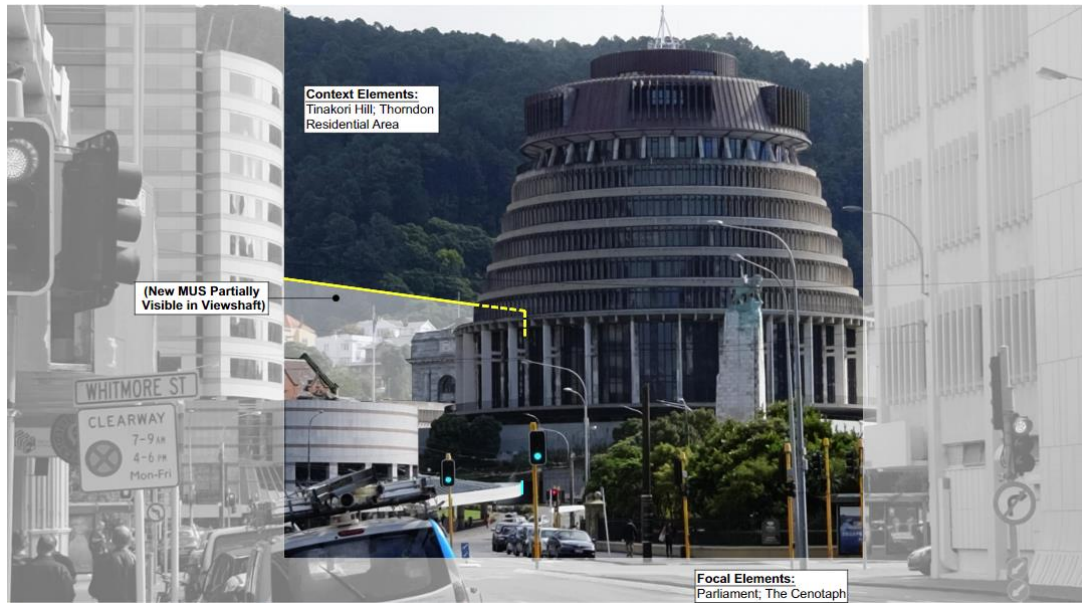
**G1.10** *Enhance views of all the elevations of the Cenotaph, including keeping large vegetation clear of the structure.*

The proposal does not impact on elevations of the Cenotaph, either physically or visually.

- 3.5 In summary, the Parliamentary Precinct design guidance is generally met, with the exception of the matter relating to alteration of original heritage fabric. The Heritage Advisor's position on this should be considered. The advice of an Arborist should be preferred when considering the feasibility of relocating the listed tree, as it will provide significant amenity benefit if successful.

#### **4.0 IMPACT ON VIEWSHAFTS**

- 4.1 Parliament Grounds are impacted by three protected viewshafts in the Operative District Plan: Viewshafts 1, 3 and 4a.
- 4.2 Viewshaft 1 is westwards along Bunny Street towards Parliament. Images supplied by the applicant on Plan P A6-02 show that the new building will not be visible in the area protected by the viewshaft.
- 4.3 Viewshaft 3 is north-westwards along Bunny Street towards Parliament from the footpath outside the Railway Station. Images supplied by the applicant on Plan P A6-03 show that the new building will also not be visible in the area protected by this viewshaft.
- 4.4 Viewshaft 4a is northwards along Whitmore Street, from the Featherston Street intersection. The MUS building will be partially visible in the bottom part of this viewshaft – see image below, from Plan P A6-04 of the application, where the visible part of the MUS building is shown shaded and surrounded by the yellow line. (The extent of intrusion into Viewshaft 4a is also a matter of concern to Submitter 3.)



4.5 The Focal Elements of this viewshaft are the Beehive and the Cenotaph. The Context Elements are Tinakori Hill (Te Ahumairangi) and Thorndon Residential Area.

4.6 When assessing an application to intrude on an identified viewshaft Council will consider:

- *whether the development frames the view horizontally or vertically from the edges of the viewshaft. The relationship between context and focal elements should be maintained.*
- *whether the development breaks up the view vertically or horizontally. This in general will be unacceptable unless the intrusion is minor.*
- *whether the development intrudes upon one or more of the view's focal elements. This in general will be unacceptable.*
- *whether the development removes existing intrusions or increases the quality of the view, particularly in relation to focal elements.*
- *in the case of proposed verandahs, the extent to which it would be screened by another verandah or building element in the foreground, or contained within the outline of a building (that is not a context or focal element) in the background.*

4.7 In respect of the intrusion into Viewshaft 4A:

- i. The MUS development would not frame the view but will truncate the bottom of it from a V-shape to a square shape. It also completely obliterates the Thorndon residential area from the viewshaft, removing the reference to the mid-ground relationship between the central city to the suburbs with the hills behind. This is not a good outcome for the viewshaft as currently described.
- ii. Considering Focal Elements, the MUS building will have little impact on the Cenotaph. The visual impact on the Beehive is slightly more, introducing a 'backdrop building' to this structure at a closer range than the residential area behind. However, the Beehive will remain dominant as the foreground element.
- iii. Tinakori Hill (Te Ahumairangi) will remain as a contextual element in the background, with the ridgeline unaltered and a substantial mass of the forested slope behind the CBD still clearly visible.
- iv. The intruding structure is not a verandah.

<sup>5</sup> Application plan P A6-04

- 4.8 Also of note is that the permitted height limit in the area captured within the Viewshaft is 27 metres, and the MUS building is of approximately that height. It is therefore highly likely that even a building of compliant or lesser height would intrude into the area within the viewshaft.
- 4.9 The issue for consideration is whether these conditions are severe enough to warrant suggesting that the MUS building is completely unsuitable for the context due to Viewshaft intrusion. Viewshaft 4a is clearly impacted, but I consider that rather than it being ruined it will be moderately altered but still of value.
- 4.10 Instead of having a foreground, middle ground and forested backdrop that suggests transition from city to suburbs to hills, the view will have a more abrupt visual transition created by the roofline of the MUS building that would suggest the business area of the city in close proximity to the wooded hills behind. Although this condition is not entirely what the viewshaft originally sought to protect, I consider it is an alternative that is not entirely unappealing. I would therefore suggest that when making a decision this would not need to be considered an unsurmountable urban design concern.
- 4.11 Mr McIndoe's report also contains an assessment in respect of viewshafts. I generally agree with the points he makes, however, I disagree with the statement made that "*MUS has no appreciable effect on Central Area Viewshafts*"<sup>6</sup>. Rather, I consider that the effect is appreciable but the viewshaft still retains adequate integrity in terms of the identified quality elements. I agree with his statement any building of a permitted height limit in the Museum Street area would produce the same effect. I also agree that BAL is not visible in any protected viewshaft.

## 5.0 SUBMISSIONS

- 5.1 Public notification of the application attracted five submissions, as outlined below and with their primary concerns that relate to urban design matters summarised.

5.1.1 Submission 1 Sandra-Lee Monk (Oppose)

**Issue(s): Retention of listed tree**

The application proposes relocation of the oak tree to a more peripheral location on the site. I consider that if successful, this will place the oak in a better location for amenity of both buildings and public spaces, and place it in a more compatibly vegetated setting.

5.1.2 Submission 2 HNZPT (Neutral)

**Issue(s): Adverse impact on historic heritage values**

HNZPT noted that the purpose and function of the precinct as a whole will not be altered, but MUS building considered to be too tall and too close to Parliament House, and loss of unbuilt space is regrettable. Views of the western elevation of PH would be obscured. HNZPT suggest a number of conditions.

The submitter does not specify from where they consider the views of Parliament House will be obscured, or to what extent or in what way, or whether they are referring only to public views or intend to include views from all places such as inside adjacent buildings. It is worthwhile to consider the views of this façade, in terms of from where they are most visible and most valued.

It is my observation of the situation that the western elevation is not the primary elevation of the building, although it is strongly architecturally detailed and an impressive secondary elevation. The façade does not contain any important doors or entrances, although windows are of regular size and spacing. The ends of the exterior are more ornately detailed than the centre. The façade appears particularly striking in the afternoon, when sunlight accentuates the decorative detailing by introducing contrast between light and shadow.

---

<sup>6</sup> Urban Design assessment, pg 47

From Ballantrae Place, Parliament House will not be visible once the MUS building is constructed. The nature of Ballantrae Place at the point where Parliament House is most prominently in view is from the access road to the car park. By the submitter's own admission, the nature of this space as the foreground to Parliament House on the western side is has "*attendant aesthetic shortcomings*"<sup>7</sup>. My view is that despite the building being handsome, neither this elevation or the view catchment for it are likely to be places specifically sought out by many people for views that are special or distinguished. (See picture below, from Ballantrae Place.)



The dwellings in Ballantrae Place have only a very limited view of Parliament House, primarily obtained from the area in front of the garages or obliquely from the south-facing decks or upper floor windows. Intervening trees also limit the visibility of the building.

The main public view of Parliament House would be from the area around the intersection of Bowen Street, The Terrace and Museum Street or from within the sculpture park. From Bowen Street the façade of the building will still be largely appreciable once MUS is constructed, although there may be additional restriction of afternoon sunlight to the western elevation that (at the moment) puts extra highlights the architectural detailing of this façade on sunny days.

From Hill Street Parliament House is largely obstructed from view by mature vegetation which will be retained. The applicant's plans P A6-18 indicate the views from Hill Street and confirm the lack of visibility of MUS.

It is not usual practice for Urban Design review to comment on view from inside private properties. However, in this respect I note that the buildings most affected building(s) would be those on the Bowen Campus, where the view of Parliament House will be largely obscured by MUS. These are fully commercial buildings with no residential component and around 20 metres separation distance. I do not consider that the view of an office building from an adjacent office building would be an unexpected condition for this situation, or that the new building would be so close as to significantly detrimentally affect amenity or outlook for the Bowen Campus buildings.

My conclusion is that the western elevation will be obscured from view, but only from middle- and long-range views, and not entirely. Because this elevation of the building is not being physically altered (apart from insertion of the link bridge) the views of this elevation will change from further ones to close-range ones, largely appreciable from the space between the buildings.

The submitter does not have the same concerns about the proposed building for services in Ballantrae Place, a position I agree with.

---

<sup>7</sup> Submission 2, page 2



The proposed MUS building will have no visual impact on the view of the front (eastern elevation) of Parliament House from the public space on the eastern side of the site.

The submitter also mentions the *“irreversible loss of open space on the west side of Parliament”*<sup>8</sup>. It is worth considering the value of this space in terms of the Parliamentary Precinct as a whole. The Parliamentary Precinct Design Guide considers the rear of the buildings to be the ‘lesser elevation’ and has little to say about the quality of spaces at the rear of the buildings. The principal open space is considered to be that at the front of the Parliamentary complex.

From an Urban Design perspective, ground-level car parking in the Central Area is quite possibly the least efficient and least attractive use within the zone and one that is actively discouraged. Although this space is ‘open’ (or more correctly ‘unbuilt’) its use is not for leisure or recreation, therefore it is considered to have low urban design value for the overall site in its current form and any improvement is to be encouraged.

The objectives and guidelines of the PPDG concentrate on retention and enhancement of the open spaces at the front of Parliament. Furthermore, guidance indicates that new buildings should be relocated to the rear of Parliament buildings and that Museum Street should be retained as a formed space. The current application would meet both these guidelines, and if more building is required within the precinct the highly preferable urban design outcome is to locate it to the rear of Parliament House. More specific discussion on the extent to which the proposal is considered to agree with the PPDG can be found in the previous section of this report.

Views from the vicinity of the sculpture park and the adjacent terrace are discussed below in relation to Submission 4.

5.1.3 Submission 3 Trustees of the Eldin Family Trust (Oppose)

**Issue(s): The extent to which the building will intrude into Viewshaft 4A.**

This matter is discussed in Section 4 above.

5.1.2 Submission 4 Ben Blinkhorne on behalf of Kapura (Oppose)

**Issue(s): Adverse impacts on adjacent business, including concern that height and position of MUS will affect sunlight and visual amenity on outdoor terrace.**

This submission raises the matter of detrimental effect on the operation of the restaurant/bar at the base of the Bowen State Building, including its use of an east-facing outdoor terrace. The matters of concern relate to shading and views of the western elevation of Parliament House.

Shading diagrams have been supplied by the applicant. They range from 9am onwards and indicate that:

1. In mid-winter (21 June), the restaurant outdoor terrace area would be shaded by the MUS building between 9.30am and 11.30am (no data was supplied for 7.30am – 9.30am).
2. On 21 March the outdoor terrace would be shaded by the MUS building until between 11am and noon.
3. In mid-summer (December 21) the outdoor terrace would be shaded until 11am.
4. On September 21 the outdoor terrace would be shaded by the MUS building until 11am.

The business trades from 7.30am till late Monday to Friday, with morning being the time when the terrace space currently receives direct sunlight. After the middle of the day the terrace is shaded by the building above the restaurant as the sun moves around to the west.

I have visited the site and confirm that the outdoor terrace has a pergola with a retractable translucent roof and interior fixed heating. The terrace is surrounded by a solid wall of

---

<sup>8</sup> Submission 2, Page 4

approximately 1.1-1.3 metres high on three sides, and the structure has the option of plastic walls which roll up or down. (See photos below, taken by myself on 11/01/2023.)



The shading diagrams supplied by the applicant indicate that despite an increase in early morning shading, the terrace remains unshaded after 11am and over the lunchtime period. Afternoon shading is already generated all year round by the building in which the restaurant is situated, indicating that shade itself does not appear to be a matter that would preclude operation of the business.

Loss of direct sunlight especially in cooler weather is regrettable. However, the submitter has already implemented measures to improve the warmth and shelter of this space, recognising that it is already in shade for the majority of their trading hours. These measures will hopefully allow continued operation of their business in much the same manner as at present. The minor loss of amenity to this area caused by additional morning shading is not considered to be a significant urban design issue.

On the matter of views, I agree that the western elevation of PH would be largely obscured by the new building in the view from the restaurant's terrace.

The matter for consideration is whether the change in foreground views would be an objectionable urban design condition of enough substance to warrant recommending that the consent is declined. It is my opinion that this is not the case. The exterior of the building has been thoughtfully detailed and there is adequate separation distance between the new building and the terrace. Although it will be closer, it will not be too close, and it has a well-considered external appearance.

The outlook from the terrace will also benefit from the amenity of the relocated oak tree, and the existing conditions for enclosing and warming the space means that the business owner will hopefully be able to continue to operate much as they do now.

The submitter also raises the issue of the applicant's UD report showing a possible pedestrian route through their leased outdoor area. I note that Mr McIndoe indicates that this is in the nature of a possible secondary connection within the wider area – it is not a proposed formal route, and there are plenty of other routes around the terrace. The submitter's point about this does not raise urban design concern.

5.1.2 Submission 5 Ewen Robertson (Oppose)

**Issue(s)** **Inefficient use of site, carbon neutrality, traffic, noise, and consultation with local residents.**

Most of these do not fall within the scope of UD consideration or will be commented on in more detail by other advisors.



In respect of local construction disruption and successful integration and management of a building site within the context, the Urban Design team requests that while the site is under construction, any hoarding around the construction site that will be visible from a public area is finished with either creative or interpretive material about the site or the project. This will not specifically address this submitter's concerns about noise and dust but will improve the appearance of the site within the neighbourhood and provide public information about the project. This can be a matter required by a condition.

## 5.2 **Comments on proposed conditions requested by submitters.**

5.2.1 HNZPT request four conditions (or equivalent) for inclusion if the consent is granted. Their requested conditions 1 and 2 relate to heritage fabric of the buildings, UD has no further comment on these. Requested condition 3 asks that a qualified and experienced conservation architect be engaged to provide input into all design work and implementation, UD would endorse this request. Requested condition 4 also appears to relate to heritage fabric, although it is unspecific about the nature and scope of drawings to be supplied or for what reason. The Heritage Advisor should comment on this request.

5.2.2 None of the other submitters request any conditions.

## 6.0 **OBJECTIVES AND POLICIES OF THE PROPOSED DISTRICT PLAN.**

6.1 The application was lodged prior to the Proposed District Plan being notified. Therefore, consideration is only required of the relevant urban design-related objectives and policies of this document.

6.2 The site is in the City Centre Zone in the proposed District Plan. The purpose of this zone is to enable and reinforce the continued primacy of the Wellington central city area as the principal commercial and employment centre servicing the city and metropolitan region. The City Centre Zone is the commercial heart of Wellington and the wider region and New Zealand's Capital City. It is also a major employment hub for the region and contains a vibrant and diverse mix of inner city living, entertainment, educational, government and commercial activity. Relative to other areas of the city it exhibits a heightened intensity and scale of development.

6.3 In terms of the PDP objectives and policies, those most relevant to Urban Design are

- **Objectives CCZ-01, CCZ-03, CCZ-04, CCZ-05, CCZ-07**
- **Policies CCZ-P1, CCZ-P2, CCZ-P5, CCZ-P7, CCZ-P8, CCZ-P9, CCZ-P12**

These are commented on below. As the PDP is in the early stages of being finalised, these policies and the comments given might be given limited weighting in terms of the final decision.

### 6.3.1 **Objectives**

#### ***CCZ-01 Purpose***

***The City Centre Zone continues to be the primary commercial and employment centre servicing Wellington and the wider region, supported by residential and a diverse mix of other compatible activities that reflect its role and function in the hierarchy of centres.***

This proposal does not adversely affect the role or function of the City Centre Zone. Rather, it enhances both the visibility and the provision of central government-related facilities by clustering buildings onto one site that is already recognised as the seat of national government, with logical, considered connections both within the buildings and around the wider area. These are positive urban design outcomes.

**CCZ-03 Urban form and scale**

***The scale and form of development in the City Centre Zone reflects its purpose as Wellington’s primary commercial and employment centre, with the highest and most intensive form of development concentrated in the zone relative to other parts of the city.***

The proposal reflects the importance of the centre of government for New Zealand and intensifies government activity within the Parliamentary Precinct.

**CCZ-04 Ahi Kā**

***Taranaki Whānui and Ngāti Toa Rangatira are acknowledged as the mana whenua of Te Whanganui ā Tara (Wellington) and their cultural associations, and landowner and development interests are recognised in planning and developing the City Centre Zone.***

Sections 2.4 and 6.3 of the applicant’s Design Statement discusses the consultation that has been undertaken with mana whenua and other persons considered to hold cultural mana for this site. The specific cultural narrative that the project responds to is:

*“Te Tai Whakarunga –the upward tide which speaks to the location of the Parliamentary Precinct and the Bowen Campus and references the hills, landscapes and waterways which were formed during the geological movement associated with the surfacing of Te Ika-a-Māui -the great fish of Māui.”<sup>9</sup>*

Their input and interests are reflected in the submitted design for both the building and the landscaping, with opportunities identified for further expression of Māori culture within the building in the future if desired.

**CCZ-05 Amenity and design**

**Development in the City Centre Zone positively contributes to creating a high quality, well-functioning urban environment, including:**

***Reinforcing the City Centre Zone’s distinctive sense of place;***

***Providing a quality and level of public and private amenity in the City Centre Zone that evolves and positively responds to anticipated growth and the diverse and changing needs of residents, businesses and visitors;***

***Maintaining and enhancing the amenity and safety of public space;***

***Contributing to the general amenity of neighbouring residential areas;***

***Producing a resilient urban environment that effectively adapts and responds to natural hazard risks and the effects of climate change;***

***Protecting current areas of open space, including green space, and providing greater choice of space for residents, workers and visitors to enjoy, recreate and shelter from the weather; and***

***Acknowledging and sensitively responding to adjoining heritage buildings, heritage areas and areas and sites of significance to Māori.***

The new buildings will reinforce the sense of place of the Parliamentary Precinct and its functions. The development responds to the growth and change of the nation’s government structure over time, requiring a new building that externally moves the Parliament buildings into the 21<sup>st</sup> century and addresses a part of the site with less-than-ideal existing conditions by converting it from a ground-level car park to a safe, attractive, useable public space. Existing valued open space areas on the eastern side of the site will not be detrimentally affected.

<sup>9</sup> Design Statement page 15

There will not be detrimental impact on the amenity of any residential areas, which are at some distance from the site.

The building has been designed to achieve seismic resistance of IL4 by including base isolation.

The heritage and cultural aspects of the development will be commented on by others, but the commitment to engage with mana whenua and provide expression of Te Ao Maori in the design of the building and surrounding landscaping is noted.

#### **CCZ-O7 Managing adverse effects**

Adverse effects of activities and development in the City Centre Zone are managed effectively both

Within the City Centre Zone; and

At interfaces with:

Heritage buildings, heritage structures and heritage areas;

Scheduled sites and areas of significance to Māori;

Identified public spaces;

Identified pedestrian streets;

Residential Zoned areas;

Open Space and Recreation Zoned areas; and

The Waterfront Zone.

The proposal is considered to support this policy. Discussion about the way in which the effects of the proposal have been managed can be taken from the previous section of this report.

### **6.3.2 Policies**

#### **CCZ-P1 Enabled activities**

The proposed building will support the purpose and ongoing viability of the Parliamentary Precinct Area by concentrating Parliamentary activities onto one site for efficiency of function. It will also introduce a building that signifies the ongoing development of Parliamentary activities on the site into the present time.

#### **CCZ-P2 Potentially incompatible activities**

The proposal supports this policy by eliminating a potentially incompatible activity (ground level car parking) from the site and replacing it with a positively-designed public space around the new buildings.

#### **CCZ-P5 Urban form and scale**

The building proposed is of a height and scale that is compatible with the Zone outcomes, and with the nature of the site and setting.

#### **CCZ-P7 Ahi Kā**

The application supports this policy, as described for O4 above.

#### **CCZ-P8 Sense of place**

The development this policy by reinforcing and building on the location's identity as the seat of the nation's government.

The Māori and non-Māori history of the site is reflected in both the building and the landscaping via a narrative developed with appropriate representatives of mana whenua. The new building will be visually prominent from certain viewpoints, but sits within a collection of buildings that it supports

and explains in terms of the development of government activities on the site over time. The introduction of a 21<sup>st</sup>-century building into this context to follow behind 19<sup>th</sup>- and 20<sup>th</sup>-century buildings is an appropriate response to development and expansion of this site over time.

#### **CCZ-P9 Quality design outcomes**

The development positively contributes to the sense of place, quality and amenity of the location by presenting a comprehensive development that responds to the constraints and opportunities of the site. It redevelops a part of the site with poor urban design amenity and presents a design which complements development of government activity on the site while explicitly expressing a modern response that befits the times.

Heritage and cultural issues have been addressed – more specific comments are provided by other advisors.

Site conditions are much improved, with better landscaping, more purposeful and considered pedestrian conditions and inclusion of cultural references. User safety on the site has been satisfactorily considered, and generally, public access to the site will still be permitted in much the same manner as at present.

The building itself is designed to a high standard of resilience.

The development supports this policy.

#### **CCZ-P12 Managing adverse effects**

The proposal is considered to support this policy by managing the effects of building dominance, height and scale through considered design and providing a high quality landscaped space around the base of the building that integrates the building and connects the space to those around it.

- 6.4 In summary, the proposed development is considered to support the objectives and policies of the Proposed District Plan.

### **7.0 CONDITIONS PROPOSED BY APPLICANT**

- 7.1 The applicant proposes that if the consent is granted a suite of conditions is imposed and have, in Section 4.3 of their AEE, outlined the scope of such conditions. Comment is made below on those related to urban design matters.

1. *Condition requiring that the proposal is constructed in general accordance with the application drawings and information provided with the application.*

This condition would be acceptable to the Urban Design team.

2. *Conditions reflecting the mitigation measures suggested in the heritage report prepared by Mr Bowman.*

Mr Bowman's report includes a number of both general and specific 'mitigation measures' in Section 7.0 of his report. Of these, I advise;

The matters relating to protection of heritage fabric should be commented on by the Heritage Advisor. The reference to the inclusion of 'a suitably qualified urban designer where relevant' should be further explained, although requiring urban design comment and/or approval on design detail prior to construction would generally be supported.

The proposed mitigation measures for Parliament House also request a number of modifications to the design of the link bridge. This matter is covered in an earlier section of this report, with urban design concerns about certain aspects of the design already raised. Urban Design would support Mr Bowman's suggestion that this matter be subject to further review and approval.

Mitigation of effects relating to landscaping and grounds work are agreeable. The standard condition used by WCC could be modified to reflect the concerns raised by Mr Bowman, in order to also achieve better urban design outcomes.

3. *Council's standard Earthworks Management Plan and Geotechnical Supervision conditions. These conditions are proven by experience to avoid or appropriately mitigate the adverse effects of ground disturbance, cutting, filling and retaining works necessary for large-scale building projects in the Central Area of Wellington.*

Not of specific concern to Urban Design

4. *Council's standard Soil Contamination Management Plan condition. This will ensure the disturbance, handling, transport and disposal of contaminated soil will be appropriately managed.*

Not of specific concern to Urban Design

5. *Council's standard Construction Management Plan, Construction Noise Management Plan and Construction Traffic Management Plan conditions. These conditions are proven by experience to avoid or appropriately mitigate the adverse effects of the construction of large-scale building projects in the Central Area of Wellington.*

Not of concern to Urban Design – apart from any possible reference in this document to finish the construction site hoardings as previously discussed.

6. *Council's standard "Detailed Landscape Plan" condition. This condition is proven by experience to ensure that the proposed pedestrian works, planting, paving and exterior lighting are designed in detail and constructed to a quality and outcome consistent with the application drawings, consistent with the recommendations of the CPTED Assessment prepared by Boffa Miskell Ltd appended to this AEE, and with wind mitigation (moderated by other design factors such as visual effects, CPTED, security considerations etc) with the objective of making the proposed pedestrian areas as safe and attractive as practicable.*

The standard condition should be modified to reflect the heritage values and significance of the site, and to address issues relating to wind on the site if these subsequently arise, noting that wind condition assessment for the site was not undertaken prior to this consent being submitted.

7. *Council's standard "Building Detail Design" condition of the resource consent. This ensures that certain specified aspects of the detail external design and appearance of the buildings (such as the final external materials, finishes and colours) are certified by the Council's Compliance Monitoring Officer.*

The 'standard condition' is unlikely to cover the specialised nature of this consent and the condition should be modified so that the certification includes consideration by the Urban Design Team. Urban Design would support inclusion of a condition relating to final approval of all exterior materials and colours of both MUS and BAL.

Submission of a final Landscaping Plan for approval by a WCC Landscape Architect and the Urban Design Team should be added.

Design detail for appropriate finishing of the seismic joint around the base of MUS should also be requested, to ensure that this does not have an adverse effect on the conditions experienced by pedestrians in the adjacent public space.

8. *Condition requiring that the relocation of the heritage oak tree is undertaken consistent with the advice contained in the Arboricultural Reports prepared by Arborlab Ltd appended to this AEE.*

Condition(s) to ensure successful relocation of the oak tree would be supported by Urban Design.

9. *Condition that hazardous substance facilities are designed and certified consistent with the findings and recommendations of the report prepared by Engeo Ltd appended to this AEE.*

Not of specific concern to Urban Design

10. *Prior to the buildings being occupied, the consent holder shall submit to the Compliance Monitoring Officer confirmation that CCTV monitoring and measures for the safety of people accessing on site external car parking at night have been put in place as per the recommendations of the CPTED Report prepared by Boffa Miskell Ltd appended to this AEE.*

This would be acceptable to Urban Design. Further comment about CPTED-related conditions is included in Section 8.2 below.

## **8.0 ADDITIONAL COMMENTS ABOUT OTHER MATTERS**

### **8.1 Response to Statement by the Wellington Architectural Centre**

The Architectural Centre also raise issues around the proposed link bridge, in terms of it interrupting views across the site. They propose that a less visually obtrusive design may be better. In conjunction with my previous comments and those also raised by Mr Bowman and the WCC Heritage Advisor, it is strongly recommended that the design of the link bridge is revisited. This is reflected in the UD request for a condition relating to the final design of the bridge.

The UD team supports the Architectural Centre's request that new buildings at Parliament overtly reflect the Government's commitment to sustainable, resilient design.

### **8.2 Comments on CPTED assessment**

- 8.2.1 The report by Boffa Miskell thoroughly assesses the receiving environment in terms of actual crime and of behaviour that concerns the site's security services. This is summarised in section 2.3 of the report, noting specifically that the site has significantly more serious and complex security considerations than most other sites and also requires the capacity to 'lock down' in situations of serious threat. However, this must be balanced with the legislative requirement to allow 'access to Government'. The site has a dedicated Security Team.
- 8.2.2 There is no concern with the findings of Section 2.3 of the CPTED report.
- 8.2.3 In terms of proposed remedial measures, the report identifies the following CPTED aspects that are recommended to be addressed by condition(s) of consent, as outlined in Section 5.2 of the CPTED report.
- 8.2.4 The following conditions of consent suggested by the applicant would address the outstanding CPTED issues identified.
- a) Lighting - A requirement for a CPTED review of the detailed lighting design for the Precinct to ensure CPTED outcomes are carefully considered and provided for. This would include a Lighting Strategy which promotes a sense of quality and safety at night, reinforces wayfinding and allows for good levels of surveillance. This includes lighting of the existing ramp up to Hill Street.
  - b) Pedestrian Link North of Museum Street Building – A requirement for appropriate management of this link through onsite security and CCTV technology.
  - c) Ballantrae Building – Explore the option for including windows in the stairwell along the East elevation of the building. Consider if a slot window can be included along the North elevation.
  - d) Management at Night – A requirement for a 'management strategy' to be prepared to address how staff will access their cars parked in the Upper Car Park and Taxis at night (noting that the acceptable location for a taxi pick-up at night is adjoining the bollards next to the Ballantrae

Place basement ramp). This is considered convenient and dignified enough to be a sustainable solution long-term.

- e) Landscape Detailed Design – A review of the detailed landscape plans for the Precinct to confirm compliance with the CPTED matters raised in this report and ensure best-practice CPTED principles are adhered to.
- f) Basement Ramp – A requirement to provide detailed design drawings to ensure that the ramp is not ‘skateable’ and uses design techniques to discourages loitering. A pedestrian barrier at the top of the ramp is recommended in this case.<sup>10</sup>

8.2.5 Conditions to this effect would be acceptable to Urban Design, subject to the details addressing the concerns being submitted to and approved by the WCC Urban Design Team prior to construction commencing.

8.2.6 Urban design would also support the remedies proposed by the applicant’s CPTED advisor for security concerns around Ballantrae Place and the Hill Street stairs – noting that these are technically outside the scope of the consent but also noting that connections between the Precinct and adjoining areas should also strive for high quality public safety outcomes.

## 9.0 **SUMMARY AND CONCLUSION**

9.1 This application is for a large-scale development at Parliament that will address matters of Parliamentary accommodation as well as improving efficiency and secure operation of the site. Two new buildings are proposed, complemented by surrounding site landscaping, and there are matters to consider in terms of listed heritage items.

9.2 The applicant has supplied a quantum of assessment related to urban design matters, which is thorough and generally agreeable. The conclusion of this report is that *“the development satisfies Parliamentary Precinct Heritage Area guidelines and meets the objectives of the Central Area Urban Design Guide”*.<sup>11</sup>

9.3 I also consider that the development satisfies Parliamentary Precinct Heritage Area guidelines and meets the objectives of the Central Area Urban Design Guide.

9.4 Five submissions were received, in respect of urban design-related issues I consider the matters raised by the submitters can be adequately addressed. Other matters raised are not relevant to urban design.

9.5 The proposal impacts on identified Viewshafts and although Viewshaft 4a is altered, the modified view still has positive qualities.

9.6 CPTED and public safety matters have been adequately considered.

9.7 The proposal does not offend the objectives and policies of the Proposed District Plan.

9.8 The conditions proposed by the applicant are generally agreeable, subject to expansion of detail.

The proposal has Urban Design Support

### ***If the application is approved, the following are recommended:***

- a. Suggested conditions

<sup>10</sup> CPTED report section 5.2 page 26

<sup>11</sup> Urban design assessment, page 47



- A tailored condition requiring consideration and approval of all final exterior building materials (including finish and colour) by the Urban Design Team.
  - A condition requiring consideration and approval of a final landscaping plan by the WCC Landscape Architect and Urban Design Team. This should include design detail for the finishing of any seismic joints visible from a public space.
  - That any modifications at any time to the design or layout or structures of the landscaping that is part of this application in order to address wind conditions arising from construction of either of the two new buildings shall be submitted to the WCC Urban Design team for comment and approval.
  - That the final design and detailing of the link bridge is submitted for approval by the WCC Urban Design Team prior to construction commencing, to ensure the support structure for the bridge does not negatively impact on pedestrian conditions around it.
  - That the construction management plan includes a requirement to install creative or interpretive material on any construction hoardings that will be visible from a public place. The material to be used shall be submitted to and approved by the Urban Design Team and the Arts Team.
  - Conditions requested by the applicant's CPTED report, or alternative wording that achieves the CPTED outcomes.
- b. Suggested advice notes
- The applicant should refer to the WCC guidance for Creative Hoardings:  
[Arts - Creative Hoardings pilot programme - Wellington City Council](#)

Peer reviewed by: Vida Christeller  
Manager, City Design