Before an Independent Commissioner of Wellington City Council

Under the	Resource Management Act 1991
In the matter	of a resource consent application for the Future Accomodation Strategy to develop the western portion of the site at 1 Molesworth Street, Wellington

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EVIDENCE OF MICHAEL JOHN DAVIS ON BEHALF OF THE APPLICANT IN SUPPORT OF APPLICATION FOR RESOURCE CONSENT

ARCHITECTURE AND DESIGN

15 May 2023

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1. INTRODUCTION

1.1 My full name is Michael John Davis. I am a senior principal at Studio of Pacific Architecture Ltd (**Studio Pacific)** in Wellington.

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

2. QUALIFICATIONS AND EXPERIENCE

2.1 I am a senior architect at Studio Pacific - a firm of architects, heritage architects, landscape architects, urban designers, and interior designers.

2.2 I have a Bachelor of Building Science and a Bachelor of Architecture (with 1st Class Honours). I am a registered architect (NZRAB registration number 2389) and I have been working in a range of architectural roles in the UK and New Zealand for over 37 years.

2.3 I am a Fellow of Te Kāhui Whaihanga New Zealand Institute of Architects.

2.4 I am a Board Member of the New Zealand Architects Cooperative Society, an organization established to assist architects and designers to obtain Professional Indemnity Insurance, and with the management of risk in all aspects of the practice of architecture.

2.5 I have worked on a wide range of project types, with an emphasis on multi-storey office buildings and large workplace interiors. Building projects that I have led while at Studio Pacific include multi-storey office buildings at the Customhouse at Centreport, alterations to 85 Molesworth Street, extensions and alterations to numbers 100 and 133 Molesworth Street, and a new building at 48 Mulgrave Street (not yet built). I have also provided design and technical reviews of a number of Studio Pacific's office and large building projects.

2.6 I have led several large private sector and Government office workplace interior fitout projects including for the State Services Commission, Statistics New Zealand, the Ministry of Defence, and the Ministry of Social Development.

2.7 I have acted as a Crown Technical Advisor for the evaluation and procurement of office premises for a number of Government Agencies. I have also given advice on an all-of-government Building Performance Specification used by agencies in the specification, evaluation and selection of office premises.

2.8 I have recently been one of four specialist technical writers/advisors on a project with Engineering New Zealand for the Ministry of Business Innovation and Employment to develop guidelines and standards for buildings to be achieve Low Damage Seismic Design.

3. CODE OF CONDUCT

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

4. SCOPE OF EVIDENCE

4.1 My evidence addresses the architectural and hard landscape aspects of the proposal, and sets out the key matters that have been considered in preparing this application.

4.2 I have been the project lead on all Studio Pacific projects at Parliament since 2015 including extensions to the main entry of the Executive Wing (EW)

(2017), and the new playground (2019). My involvement in this project goes back to its genesis in late 2014 when Parliamentary Service conducted a competitive selection process, following which Studio Pacific (in collaboration with an Australian Workplace Specialist) was commissioned to develop a Future Accommodation Strategy for Parliament. Following more work and another competitive bid the Studio Pacific team carried out design work for an earlier iteration of the proposed Museum St building (**MUS**), pedestrian plaza and landscaped areas (**LAN**), and possible adaptation of the Executive Wing (**MIN**). This phase of work was paused in October 2017.

4.3 The formal commission for the proposal which is the subject of this consent application commenced in late 2020. The original brief was extended to include:

(a) the addition of a separate security screening building located close to Ballantrae Place (BAL);

(b) a raising of the Greenstar target to 6-star from 5-star;

(c) the inclusion of a Carbon Zero target;

(d) more explicit inclusion of mana whenua co-design; and

(e) a higher standard of seismic resilience (in the case of MUS this went from Importance Level 3 to 4), and consideration of climate change resilience.

4.4 My evidence will cover the following matters:

(a) a summary of the proposal;

(b) an update on design development since the application was lodged;

(c) mana whenua co-design process;

(d) LAN Design in Response to Wind;

(e) Crime Prevention through Environmental Design (**CPTED**);

(f) comments on the Council's Report and suggested conditions;

(g) comments on submissions; and

(h) conclusions.

5. SUMMARY OF EVIDENCE

5.1 The design process has continued since the application was lodged. This has led to relatively minor design developments and refinements that naturally arise from working through the finer details of design and constructability with consultants and contractors. Changes have also been made in response to comments arising through the consenting process. I consider that these developments have been positive for project outcomes.

5.2 The mana whenua co-design process, in particular working with the cultural design lead Len Hetet, has continued to be very positive. Much of the work has been concentrated on the interior of MUS but also on the other project aspects BAL and LAN. All of this work continues to support the expression of the cultural and site-specific narrative.

5.3 The landscape design has continued to develop in more detail, in particular to address wind mitigation by providing shelter in the more exposed areas, or by improving the shelter already proposed.

5.4 Many CPTED related design improvements were made prior to the application lodgment, and we have been cognizant of the suggestions made in the CPTED report and adopted these as much as practicable.

5.5 I have made some comments on the proposed conditions, which will be attached to the evidence of Mr Coop.

5.6 I have commented on several of the submissions, in particular that of Heritage New Zealand Pouhere Taonga. The core of their concern with respect to my area of expertise is principally the height of the MUS building and its proximity to Parliament House. I believe that the height of MUS is appropriate in the context of the precinct and a reduction in height would do little to improve the visibility of the PH west façade. The MUS building is narrow for a modern office building and its distance from the façade of

PH is principally driven by (a) the desire to create quality outdoor spaces on both its east and the west sides and (b) the length of a ramp from the Ballantrae Place entry. I therefore believe that the distance between the buildings is optimized given these constraints. In addition, MUS is conceptually a modern wing of Parliament House and so a bridge is an appropriate connector. The link bridge has a number of structural demands which inevitably give it visual mass.

6. SUMMARY OF THE PROPOSAL

6.1 The application for resource consent for MUS, BAL and LAN includes drawings and images of the proposal, as well as a design statement that describes the proposal.

6.2 The larger of the two buildings is the 6-storey Museum Street building, MUS. This new building, located approximately equidistantly between the Bowen State Building and Parliament House, is conceptually a new wing of the latter. Like the other buildings on the precinct, it is very much 'of its time' in its design and construction. This includes the use of base isolators and viscous dampers to resist seismic loads and meet IL 4 requirements for post-event functionality; mass timber construction for all main structural members including all upper floors; a unitized façade system with high performance glass, seismic detailing, and a decorative metal screen/sunshade; the use of a re-useable demountable partitioning system for flexibility; a 6-star (world leading) Greenstar rating; an east-west public pedestrian link through the ground floor; and the integration of artworks that express the cultural narrative of mana whenua.

6.3 The smaller 2-storey building is the secure deliveries building, BAL. This is located at the Ballantrae Place entrance where all deliveries to the precinct will arrive, be security-screened, and then delivered via the basement network to the other buildings on the precinct. This building will also be where all contractors and trades visitors to the site are processed. It is intended to be a more recessive building than MUS but in its own way is

also of its time and includes mass timber floor construction; 5-star Greenstar minimum; IL 3 seismic standard; and the expression of the cultural narrative.

6.4 The landscape treatment LAN linking all the buildings on this part of the precinct will change what is currently a vehicle dominated area into a connected and legible series of outdoor spaces – principally a redefined Museum Street and a new west courtyard. The latter being a new setting for the relocated Museum Street oak tree. The landscape is part of the Greenstar rating of the buildings and uses a simple materials palette, and plant selections to maintain ecological values. The design has evolved to address CPTED issues whilst also providing good amenity, accessibility, and through-site links. It will also express the cultural narrative through ground and wall surface treatments.

7. DESIGN DEVELOPMENT SINCE APPLICATION WAS LODGED

7.1 Since the application for resource consent was lodged, design work has continued on the MUS and BAL buildings and on the LAN design. In mid-March 2023 the design team commenced design-related work on the preconstruction stage with a reputable contractor and specialist subcontractors (for mass timber structural elements, façade, base isolators, and seismic dampers). This process effectively tests and validates assumptions that have been made to date by the core design team, and where necessary allows for design changes to be made for buildability or cost reasons.

7.2 Below I describe any significant or relevant design refinements that have been made since the application was lodged, and any changes made as a result of engagement with the preconstruction contractors. I understand from Mr Coop that these changes do not result in any changes to the activity status or provisions under which resource consent is required under the Operative District Plan.

Museum Street Building

7.3 Firstly, I wish to clarify the that the phrase 'glazing to ground floor' on the Studio Pacific elevation drawings 2652 PA4-10 to 2652 PA4-13 (included in the application material) of the MUS building does not mean that it will have a fully transparent ground floor. It is logical to conceal some areas of what is behind the façade – namely plant items, toilets, end-of-trip facilities etc. For these areas, the façade will either be glass with a metal back-pan behind, or more likely a coated aluminium façade panel. There will be an exception to this in the case of the emergency generator plant space which will – for CPTED reasons – incorporate panels of glass (with no back-pan) at the north-west corner to allow cross views for pedestrians walking in this area. The meeting rooms (south end) will be visible from the outside but may have a semi-transparent applied film on the inner pane up to something in the range of 0.5 metre to 1.0 metre above floor level. This is to give some modest privacy to these rooms if required. Most importantly, the entry structure is still proposed to be fully glazed.

7.4 Recent work with a specialist façade subcontractor has not identified any particular concerns about the proposed unitized façade and the applied metal screen shown on the images lodged, except for the red niho taniwha pattern. The red colour was proposed to be a ceramic screen print on the outer surface of the outer pane to make it read strongly (refer application drawings 2652 PA06-05 PA06-09 and PA06-15), but we have been advised that no warranty for the long-term performance of this would be available. We have investigated an alternative using a white ceramic print on the inside surface, and the cultural design lead has confirmed that he is happy with this alternative to the original design. Importantly the colour red is still possible to be achieved with feature lighting at night. It is arguable that the night-lighting creates a more dramatic impression by virtue of the contrast with the daytime appearance. The two images below demonstrate this effect.

Figure 1. View showing south elevation of the MUS building with a white niho taniwha pattern.

Figure 2. Same as above but with coloured lighting at night.

7.5 The detailing of the seismic movement joints of the link bridge has changed but not in a way that is material to the impact on the Parliament House façade.

7.6 The canopy on the west façade is now proposed to project approximately a further 900mm out from the original design, and now incorporates glass wind screens (between the pou and the wall) to both sides as illustrated below. These design refinements are to enhance shelter and pedestrian amenity.

Figure 3. View of MUS enlarged west entry canopy with glass wind screens. Note that the red frit on the glass visible above the canopy will in fact be white.

Ballantrae Place Building

7.7 Studio Pacific elevation drawing 2650 PA5-05 for BAL has a note referencing areas of carving on the stone base of the east and west elevations. This is no longer proposed because, following discussions with the cultural design lead it was agreed that any additional carving may detract from the importance of the carved section by the door on the south elevation (already shown on the drawing next to the loading dock door – see figure 4 below) as a signifier of the building's entry.

7.8 Recent work with a specialist façade subcontractor has not identified any particular concerns about the proposed cladding.

7.9 The height of the screen around the roof top plant has been raised to screen plant behind and is now approximately 0.5 metres higher than the application drawings but these drawings do not note a dimension and the height is still well under the 27m height limit. The difference between the proposed height and that shown in the application is illustrated below.

Figure 4. Excerpt from application drawing 2650 PA5-05 showing the increase in height of the plantspace screen (marked in red). Also note carved area by entry door.

7.10 There have been minor refinements to the façade composition, for example to stone module sizes which may change again as the technical details are worked through.

7.11 An item relating to a window on the east elevation is discussed under CPTED below.

Landscape (LAN)

7.12 The landscape design has been progressing on items of detail in broad accordance with the application drawings including refinements to the west courtyard space.

7.13 Design developments to this area have come about in response to two factors, namely the Bowen State Building's ground floor tenant not supporting opening up/linking the terrace area of the café to the proposed LAN courtyard, and the integration of wind shelters to mitigate the effects of wind speed.

7.14 A plan incorporating the above described refinements is illustrated below and includes:

(a) a reduction in the extent of stairs and bleachers immediately adjacent to the Bowen State Building terrace, and corresponding increase in planting;

(b) the addition of low level planting beds to the centre of the courtyard;

(c) additional seating; and

(d) the addition of wind screens (refer to the section on wind below for more information on these).

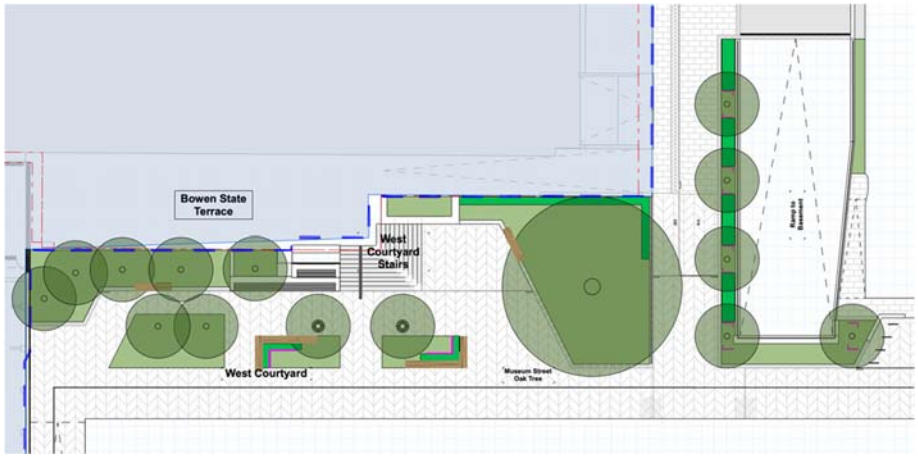

Figure 5. Current Plan of West Courtyard (wind screens shown in pink).

7.15 The overall effect of these changes is to create a greener and more sheltered area than that shown in the drawings lodged with the application (see excerpt below), albeit with reduced integration with the adjoining Bowen State campus.

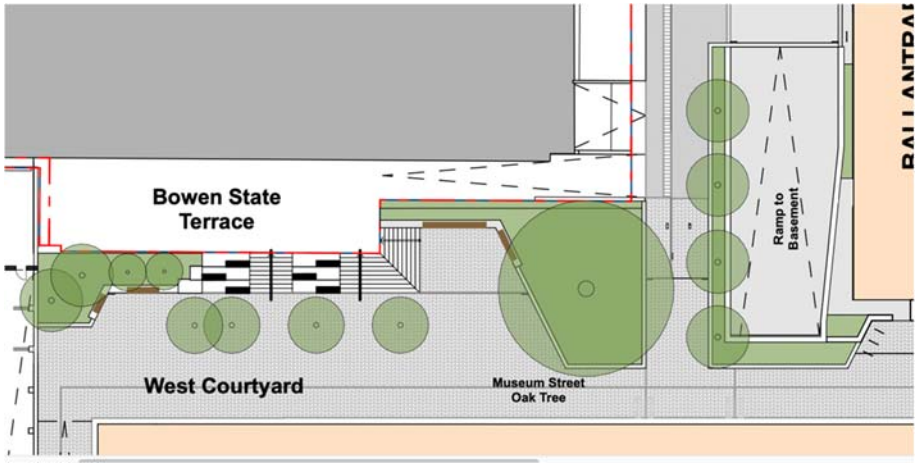

Figure 6. Excerpt from Application Drawing 2662 PA2-04.

8. MANA WHENUA CO-DESIGN

8.1 The AEE Section 4.2.2 makes reference to ongoing consultation with Te Āti Awa, Ngāti Toa and Taranaki Whānui ki Te Upoko o Te Ika.

8.2 Since the earliest design work on this project, we have been working with Kura Moeahu, - Cultural Advisor to the Parliamentary Service, and more latterly with Len Hetet - Cultural Design Lead. There has been an evolving process of establishing and expressing an overall cultural narrative and a specific project narrative. The nature of that collaboration with respect to co-design – meaning the way in which mana whenua are able to express their cultural narrative in the buildings and landscape - is set out in further detail in my Design Statement lodged with the application, and has largely involved a series of design workshops with Len Hetet, Te Āti Awa.

8.3 We have sought confirmation from Len during the co-design process that the appropriate iwi representatives were being kept up to date with design progress. Most recently this was in an email exchange with me of 13 April 2023 where Len confirmed: …*Te Āti Awa and Ngāti Toa were approached and Len Hetet from Te Āti Awa was tasked in leading the cultural design input on behalf of Mana Whenua with the support of both iwi, this was further acknowledged by Kura Moeahu.*

8.4 The application documents include information on several design elements that express the cultural narrative. Co-design discussions continue and in the case of MUS extend to:

(a) the location of decorative markers set into the ground floor to indicate a notional route of the Wai-piro stream;

(b) a treatment to a section of the lift core symbolizing the heavens that will rise up through all floors and be visible at night;

(c) a wall treatment to the main north and south egress stairs that symbolizes the scales of the tupua, Whātaitai;

(d) and a range of engraved metal cover-plates to conceal fixing holes in the timber structural members.

These are illustrated in Appendix 1.

8.5 In relation to BAL, there are no further exterior co-design elements proposed, but there is the potential for a painted super-graphic on the rear wall of the truck dock. This is to raise the quality of this space above its utilitarian function and to present something pleasantly unexpected when the dock-way door opens.

8.6 In the case of the landscape design, we are continuing to work with Len to express the cultural narrative including planting selections, paving design and patterns incorporated in the exterior timber screens that cover up large retaining walls.

9. LAN DESIGN IN RESPONSE TO WIND

9.1 The Applicant is aware that the existing project area is occasionally exposed to high wind speeds. Accordingly, it commissioned wind experts WSP, to assist Studio Pacific in the design process with the objective of ensuring that the design of the proposed publicly accessible spaces (LAN) is optimal in addressing the various applicable design factors such as wind speed, safety/CPTED, visual quality and ease of maintenance.

9.2 Early consideration of the effects of wind in particular is something that the Studio Pacific design team took into account as we developed the design of the proposal. Strategically, we surmised that a long thin building running in a roughly north-south orientation would be a reasonably optimal solution for a building like MUS. We also considered that (among several other reasons) locating this roughly in the middle of the available space between the Bowen State Building and Parliament House would (amongst other things) minimize any sort of wind tunnel effect and give 'breathing space' for both Parliament House and the Bowen Street Building. Being aware of the existing downwash effect of the taller Bowen State Building meant that a bias away from this building would likely be preferable, but this had to be balanced against the potential heritage effects of being too close to

Parliament House. Although the BAL building runs east-west which is usually not optimal for wind, it is a low-rise building set into the existing bank.

9.3 Given the windy nature of the existing site, we were pleased at the number of locations where WSP's wind assessment report (submitted with the application) found our design resulted in an improvement to wind conditions. This was particularly so on the Museum Street (east) side of the MUS building, which we regarded as a more important space than the west courtyard, because it not only provides a direct north-south pedestrian route through the site but also because it is where the formal 'front door' of MUS is located. Improvements to the west entry of MUS to mitigate the effects of wind on that side are shown in figure 3 above.

9.4 Our design for the west courtyard seeks to provide an appropriate setting for the Museum Street oak tree (and the Applicant's Arborist is satisfied that the wind speeds are acceptable for the health of the tree in this location) and also to provide pleasant spaces to sit on less windy days.

9.5 Since the application was lodged, Studio Pacific has continued with more detailed design to optimize the design of LAN, taking into account various design factors such as wind, CPTED, visual appearance, and maintenance of the courtyard/plaza areas.

9.6 For the west courtyard, an indicative design and locations of possible screens or "micro-wind shelters" are illustrated below as a way to provide optimal courtyard amenity. These are proposed to be a series of approximately 1.5m high perforated metal or timber battened screens located in combination with low level hedges. They are also shown in pink in the plan in Figure 5 above. These images are indicative only but illustrate the type of detailed design refinements that we will continue to explore. I understand that the final detail design of LAN is proposed to be the subject of conditions of resource consent (conditions 70 to 75 of the Council

Officers report). I comment specifically on condition 74 later in my evidence.

Figure 7. Looking towards west entry of MUS with windscreens in blue (for illustrative purposes) on left.

Figure 8. Looking south in west courtyard showing windscreens in blue.

Figure 9. Looking north in West Courtyard showing screens in blue.

9.7 Dr. Donn (WCC Advisor on wind) provided email advice on 29 June 2022 and 3 May 2023. In that advice, Dr Donn refers to two aspects of the MUS building design, namely the wind lobbies and the bridge link to Parliament House. On these I comment as follows:

(a) The bridge link has not been identified in the WSP report as problematic with respect to wind. The design team has endeavoured to minimize the bulk and profile of the bridge to minimize adverse heritage effects, which will also help to mitigate any adverse wind effects.

(b) There are wind lobbies at both the east and west ends of the MUS east-west link. The eastern one is limited in its depth by the space required by security speed-gates for staff and accredited users (not shown on the application drawings but proposed to be located immediately to the south of the wind lobby). From my experience, the east elevation of a building is typically the least wind affected in Wellington and so I am not concerned about this lack of depth. The west wind lobby is also similarly limited in its depth by the adjacent security screening area to the south. This screening is for any non-accredited visitors and so it is important to ensure adequate queuing space for potentially large numbers.

For this reason, it is not possible to enlarge this lobby. Should the east-west link become something of a wind tunnel, it should be possible to 'tune' the operation of the inner doors of the west lobby to delay their opening and thus minimize this effect. I would make the point that the east-west link was added for CPTED reasons, but the tradeoff has been shorter wind lobbies than an earlier single-entry design with a deeper wind lobby.

(c) The enlarged external shelter with additional windscreens at the west entrance is covered in 7.6 (and figure 3) above.

10. CRIME PREVENTION THROUGH ENVIRONMENTAL DESIGN (CPTED)

10.1 CPTED is an important part of the application. I comment briefly on some key matters that we have considered in relation to CPTED and the application.

10.2 The Boffa Miskell CPTED Report (Appendix 10 of the application) makes reference to the significant design changes made to address CPTED issues prior to the application being lodged. I can attest to the extensive work and re-design that went into addressing the CPTED issues on the site. For example, the earlier design of the MUS building had no publicly accessible east-west link, and so the change to address this matter alone represented not only a loss of floor area, but an extensive re-design to reallocate internal spaces.

10.3 As part of a positive appraisal of the proposal, Page 16 (item b)) of the CPTED report refers to the strong pedestrian connections with the Bowen State Building. It should be noted that the blue arrow indicating a linkage from the Bowen State Terrace to the West Courtyard (see figure below) will not now be available because the operator of the ground floor food and beverage outlet does not currently support this access. This note also applies to page 18 item h) in the CPTED report. I have spoken to the author

of the CPTED report and she is not concerned about this loss of connection because there are others available.

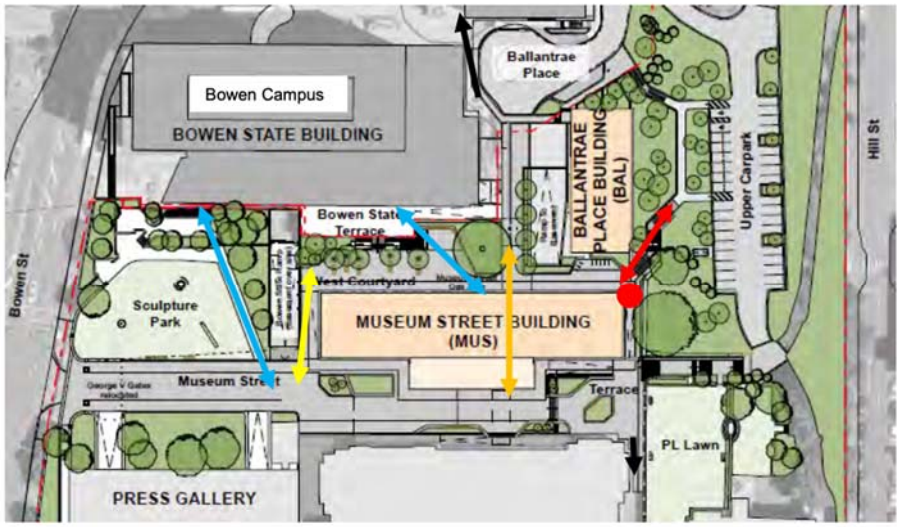

***Figure 5**: Future Accommodation Strategy Site Plan (source: Studio Pacific Architecture)*

Figure 10. Excerpt of Boffa Miskell CPTED Report. Note the right hand blue arrow connection discussed above.

10.4 Page 17 (item b) notes strategies to keep people from loitering close to MUS windows. Because the MUS building is seismically base isolated, it has a 2.5 metre wide 'apron' at ground level that is generally constructed of metal with paved inserts. This is designed to move in an earthquake up to 1 metre (in an extreme event). Both the apron and the movement zone must be kept clear at all times or have planting beds sitting below this movement plane. This full perimeter 3.5 metre clear-zone explains why raised planted areas are not immediately adjacent to the building façade. In addition to the landscape treatment being designed to draw people away from the building perimeter, it will be extensively monitored by 24/7 CCTV cameras.

10.5 Page 19 (second paragraph) requests that the design team explore adding windows to the stairwell of the BAL Building (see also 5.2 Recommended Conditions of Consent item c)). We did look into this, but found that the BAL building does not have many staff (circa 25 at most), and most staff movements will be from the ground floor down to the basement to distribute screened goods. This means that the upper levels of the stairs will not be used very often and so will not contribute meaningfully to the observation of the space below. We reviewed the remainder of the east elevation of BAL to see if there were other opportunities to add a window,

but much of the façade is inaccessible because of the lift shaft (south), a services riser (north), plant space (level 2 north). These limitations are illustrated below.

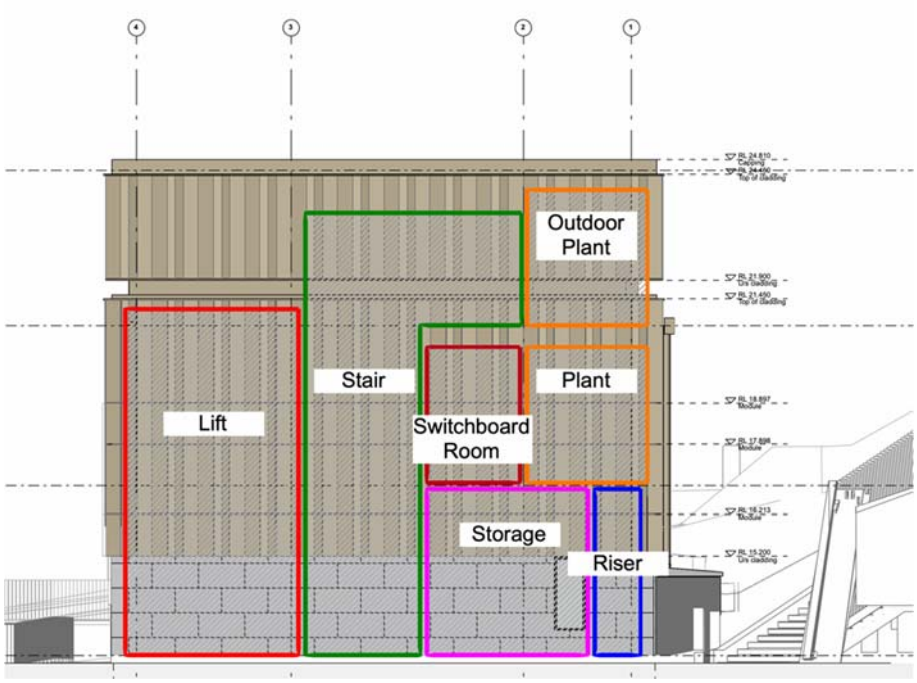

Figure 11. BAL East elevation marked up with what is behind the areas of facade.

10.6 Reference in the report (incl. 5.2 Recommended Conditions of Consent item b)) is also made to the monitoring of this space via CCTV, and I can confirm that there will be multiple CCTV cameras for this purpose.

10.7 Page 20 of the report (paragraphs 2 and 3) refers to observation of the upper carpark from windows on the north façade of the BAL building. The design team has managed to keep the three clerestorey windows as shown in the application drawings. These, along with thoughtful articulation of the heights and density of the planting on the bank to the north, will allow for some observation to and from the upper carpark. It should also be borne in mind that the nearby MUS building levels 2 and above will have good views over the upper carpark.

10.8 Section 4.2.3 of the report makes several suggestions about the connection up to Hill Street. I understand that there is an intention on the part of Parliamentary Service to make improvements in this area in conjunction with a future project to enhance the rear of the Parliamentary Library.

10.9 Page 22 (item b)) refers to security provisions in the ramp. In addition to the barrier arm and double roller doors, Parliamentary Service has since requested that a pop-up barrier is also installed as illustrated in the cross section drawing below. The report makes some suggestions to discourage skateboarders, such as speed bumps, but we have not incorporated these because the area will be well monitored by security staff, and the ramp will have control arms at the top.

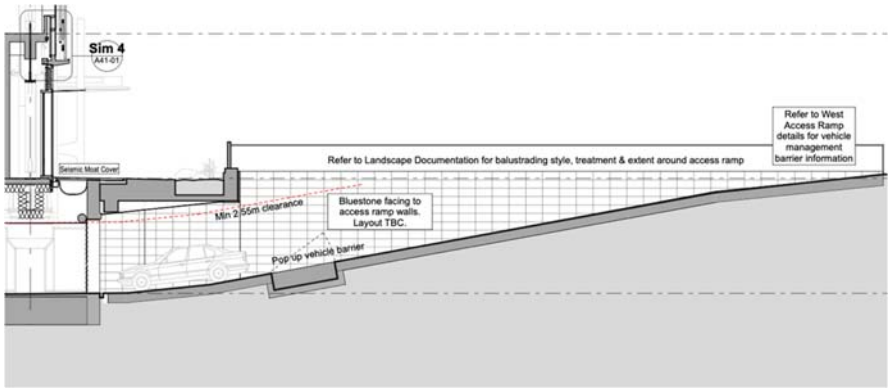

Figure 12. Cross section through MUS ramp showing pop-up vehicle barrier.

10.10 With respect to the proposed condition (#70) contained in Annexure 13, I accept the general wording of the condition but I recommend amendments to the penultimate paragraph so that it reads: '<u>As far as reasonably practicable,</u> the information submitted must be to a quality and outcome consistent with the application drawings and the recommendations in section 5.2 of the CPTED Assessment prepared by Boffa Miskell Ltd (Appendix 10 of the application)'.

10.11 In my view, the words 'as far as reasonably practicable' need to be added. The matters outlined in paragraphs 10.3 to 10.9 above are examples of aspects where it has not been practicable to implement the Boffa Miskell recommendations in their entirety, and I consider it important that these practicalities are taken into account in assessing compliance.

11. COMMENTS ON THE COUNCIL REPORT

11.1 I have read the Council's section 42A report, and comment here on particular points relevant to my area of expertise, where not addressed

elsewhere in my evidence (for example in relation to CPTED and wind effects as discussed above).

11.2 In relation to the link bridge (discussed at paragraphs 46 to 49), I agree with the report that it is likely that the link bridge will be in place for many years. This is because it will provide efficient access from MUS to the same level as the Debating Chamber. The design team has endeavoured to minimize its visual impact, but its seismic performance needs to be to IL3 (Importance Level 3) and it is required to be appropriately supported on 4 columns (straddling the basement tunnel under) so the connecting beams are relatively deep. It must also have seismic joints at both ends that have to accommodate the differential movements of two buildings (1.4 metres at MUS and 0.7 metre at Parliament House). These cannot be assembled as glazed components. The bridge is also naturally ventilated which requires intake and extract grilles. I consider that the proposed design is acceptable in providing the required bridge connection with appropriate structural engineering while at the same time, minimizing its visual impact.

11.3 In paragraph 12.3 below I respond to the comments from paragraph 137 regarding limited use of bare/unpainted metal.

12. COMMENTS ON SUGGESTED CONDITIONS

12.1 I have the following comments on the conditions set out in Annexure 13 of the Council's section 42A report. These amendments have been included in the amended conditions attached to the evidence of Mr Coop.

12.2 **Condition 42**: I suggest that the word 'ground' is added before the words 'floor level', to avoid confusion with the basement levels.

12.3 **Condition 55**: The current design for external balustrades and handrails incorporates the use of unpainted weathered brass. This is to create some consistency with the handrails and barriers that are part of the existing Cenotaph-to-Parliament forecourt area. The condition refers only to

unpainted galvanized steel, and copper and I believe is in relation to the stormwater runoff from these metals having a corrosive effect on certain other materials, or it could be referring to the adverse effect of the runoff from one onto the other. Either way, I do not think that it is referring to brass. For the avoidance of doubt, I suggest that the following words be added to the condition: 'This condition only applies to these two metals used separately, and does not include copper alloys such as brass or bronze.'

12.4 **Condition 65** (bullet point 5): This requires the design team to: 'Achieve a reduction in the size of the columns to support the bridge as far as practicable'. It is important to note that the structural size of the steel columns is determined by the forces acting on the bridge, and I understand from the structural engineers that they are an efficient size. Smaller columns may be possible, but would require cross bracing which would be visually obtrusive in a different way. Overlaying these steel columns are large pieces of shaped timber that effectively transform the steel columns into pou or markers, but in doing so make them larger in appearance. These four pou came out of the co-design process and we believe they perform an important role as a tomokanga to signify the location of the MUS entry. For this reason, I recommend that this requirement (being bullet point 5) is removed from the condition.

12.5 **Condition 68** (bullet point 4): this condition requires 'Signage on the buildings, which must be limited to identification of the MUS and BAL buildings, wayfinding, and traffic management.' I recommend that the words 'and appropriate interpretative information' are added to the end of this sentence. This would allow the design team (or Applicant at some time in the future) to add information, for example about heritage or mana whenua aspects of the completed buildings and landscape to the signage.

12.6 **Condition 70**: this refers to section 5.2 of the Boffa Miskell CPTED Assessment. As set out above, I recommend the words 'as far as reasonably practicable' are added to the sentence referencing this report, or some other mechanism, to take into account the matters I have set out above

regarding the need to balance a number of criteria when considering CPTED.

12.7 **Condition 74**: Because the wind conditions on the east side have generally been improved I would like to see bullet (i) restricted to the west entrance only. I would also like to see the specific dimension of >3m deleted, or reduced to >2.5m which would be practical in this particular case. I also recommend the words at the end of the first paragraph of the condition are revised to 'as far as reasonably practicable' *,* or some other mechanism, to take into account the matters I have set out above regarding the need to balance a number of criteria when considering wind mitigation*.*

13. COMMENTS ON SUBMISSIONS

Submission 1 – Sandra-Lee Monk

13.1 I note that early on in the design process, consideration was given to relocating the tree referred to in Ms Monk's submission (tree # 100) from its current location in the middle of a small roundabout to elsewhere on the precinct. This approach was rejected following advice given to the Studio Pacific landscape architect by arborists Arborlab at a meeting on 28 March 2022. This was on the basis that this specimen of an Algerian Oak was not in particularly good condition and to quote the meeting notes 'not worth keeping'. I understand that following engagement with Parliamentary Service, Ms Monk has indicated that her concerns have been resolved.

Submission 2 – Heritage New Zealand Pouhere Taonga

13.2 This submission is neutral overall, but Page 3 of this submission is critical of the size, height, and location of the MUS building in relation to Parliament House.

13.3 The MUS building is narrow for a modern office building that sits in the round. This is because its design is not premised on creating a large flexible open plan office space, but instead is based on a repeated cellular planning

module with a central corridor. This arrangement was proposed and approved in the 2015 Future Accommodation Strategy mentioned earlier in my evidence. This narrowness correspondingly creates wider outdoor spaces on either side of the building. These better proportioned spaces provide amenity and, in the case of the east side, good views of the west façade of Parliament House. On page 3, paragraph 3, the submitter acknowledges the tradeoff of height vs footprint, which in this case may have allowed a lower building (but which would still obscure views of the west façade, particularly at pedestrian level), but one that was closer to the façade of Parliament House and with less outdoor amenity. In my view, the size, height, and location of MUS are justified, and the submitter appears to acknowledge that there are limited ways in which such concerns can be addressed.

13.4 The height of MUS has taken its cue from the adjacent Bowen State building, and the District Plan 27m height standard, with a view to creating a good area of office space. It is only slightly higher than the 27-metre height limit, partly to provide a high perimeter parapet to ensure safe access to the items of roof top plant and equipment, for example photovoltaic cells. This is a modest height compared to say the Beehive (approximately 48-metres high) which is closer to Parliament house, or the nearby Charles Ferguson Tower (approximately 63-metres high).

13.5 I do not believe that MUS is too close to the west elevation of Parliament House. Part of the reason for this is that the width of Museum Street is similar to some city street widths in Wellington where is it still possible to appreciate the details of building facades. For example the width of Museum Street as noted on drawing 2652 P A4-03 (20.5m building face-to-building face) is wider than the building face-to-building face dimensions in Wakefield Street by the Town Hall (approx. 20.0m); Brandon Street (approx. 17.8m); Lambton Quay at the Willis Street end (15.8m) – all of which are streets where it is possible to appreciate the architectural qualities of heritage facades. Moving MUS further west would also tend to increase the visual prominence of the link bridge and increase the distance between MUS and the debating chamber with reduced ongoing efficiency.

13.6 MUS is also not able to be located further away from Parliament House to the west for two further reasons. The first is the vehicular ramp from the Ballantrae Place entry point had to be to a prescribed maximum slope of 1:5 which then produces a particular length of ramp to get sufficient headroom under the MUS ground floor structure (the actual design is 1:5.6 but this allows for some construction tolerance and other factors). This effectively sets out the western-most edge of the MUS building (refer to Figure 12 above). The second reason is that if the MUS building was closer to the Bowen State building, there is an appreciable risk that the west courtyard space would become unpleasantly narrow and windier, and would not provide sufficient 'breathing space' around the relocated oak tree.

13.7 As an illustration of the various factors that needed to be balanced, in addition to suggestions that MUS be located further away from Parliament House, there were requests from some politicians to locate MUS closer to Parliament House in order to minimize the time it would take to get to the Debating Chamber. The Studio Pacific team considered all such requests and I am satisfied that the proposed location and design strikes a good balance.

Submission 3 – Eldin Family Trust

13.8 A response to the matter of the impact on the viewshaft is covered by others, but I note that the material provided in Studio Pacific's application drawings (drawing 2650 PA6-04 Revision 2) has been reviewed by a registered surveyor, Mr Moody, who confirmed the drawings accurately represent the view of MUS in the viewshaft.

Submission 4 – Ben Blinkhorne

13.9 A response to the issue of any rights to sunlight and views to the café/bar within the Bowen State complex is addressed in Mr McDonald's statement of evidence.

13.10 I very much support the link from the west courtyard to the Bowen State Terrace as shown in Figure 4.4 of the McIndoe Urban Report. The submitter is of course within their rights to choose not to link their terrace space to the west courtyard. However, in anticipation of there one day being one, the west courtyard is being designed to allow for a future link which could be created by cutting down some section(s) of the existing concrete perimeter wall of the terrace. This will activate both sides of the legal boundary with improved urban design and CPTED outcomes. A possible halfway solution would be to cut down the wall as part of the construction process, and install a gate/temporary wall that could be opened/removed if the submitter saw merit in opening up to the west courtyard. I can also confirm that Parliamentary Service will continue to seek dialogue with the owners of the Bowen State complex and the adjoining ground floor occupier to continue to explore mutually beneficial refinements.

Submission 5 – Ewen Robertson

13.11 A response to this submission is addressed in other statements of evidence.

14. CONCLUSIONS

14.1 The proposed MUS building provides much needed modern and flexible office space in a seismically resilient, environmentally world leading, carbon-zero building. It is effectively a new wing of Parliament House located sufficiently distant to allow for the appreciation of the façade of that heritage building, but close enough to create an efficient link between the two buildings. Its height and mass are appropriate when taking into account spatial needs whilst also respecting context and heritage.

14.2 The BAL building with its screening function and the overall site planning minimising vehicle access onto the precinct will significantly improve security on the precinct. Furthermore, a wide range of CPTED issues have been addressed in the landscape design, supported by building features like the east-west link of the MUS building.

14.3 The clearer definition of a pedestrianised Museum Street, and the creation of the new west courtyard – together with a range of soft landscaping (including the relocated Museum Street oak tree) – will provide a good variety of publicly accessible outdoor spaces and visual amenity. This will be supported by good CPTED design and appropriate wind mitigation measures.

14.4 The three project aspects of MUS, BAL and LAN all incorporate and sympathetically integrate the expression of the cultural and site-specific narrative that has come from mana whenua as partners in the co-design process.

Michael John Davis

15 May 2023

APPENDIX 1

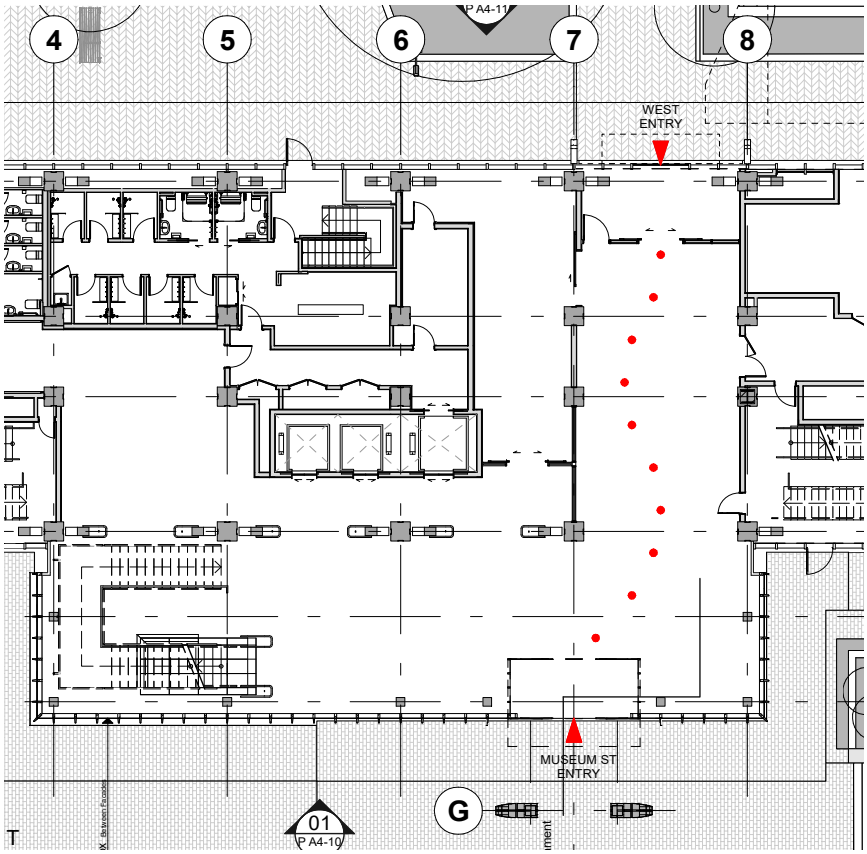

Figure 13. Excerpt from Application Drawing 2652 PA4-03 marked up with locations of Wai-piro stream 'markers'.

Figure 14. Cross section through MUS showing artwork on the lift fronts, rising up through the floors.

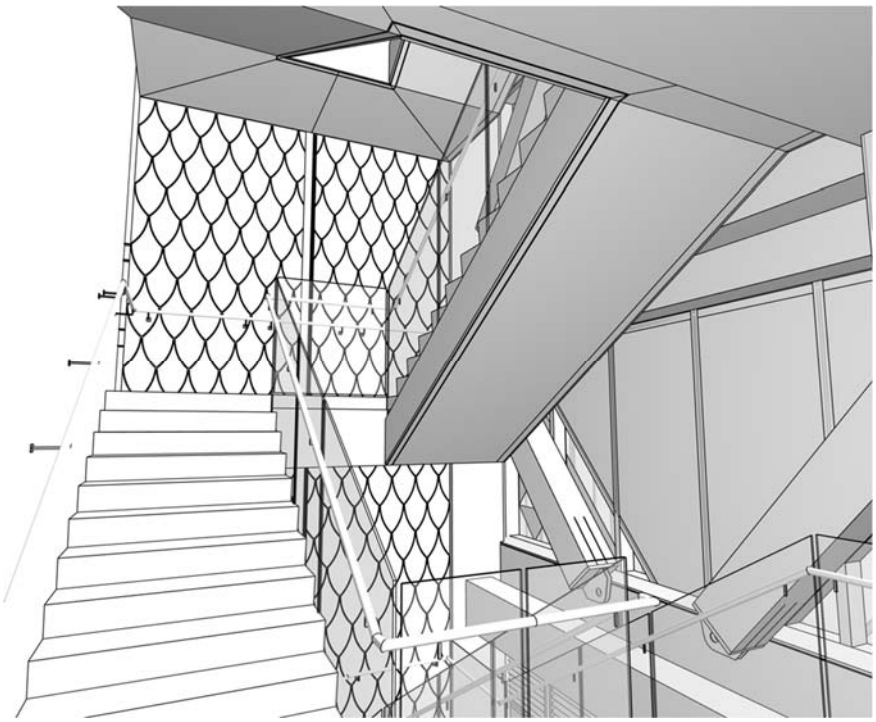

Figure 15. 3-D wireframe image of stairs in MUS showing 'scales' on back wall.

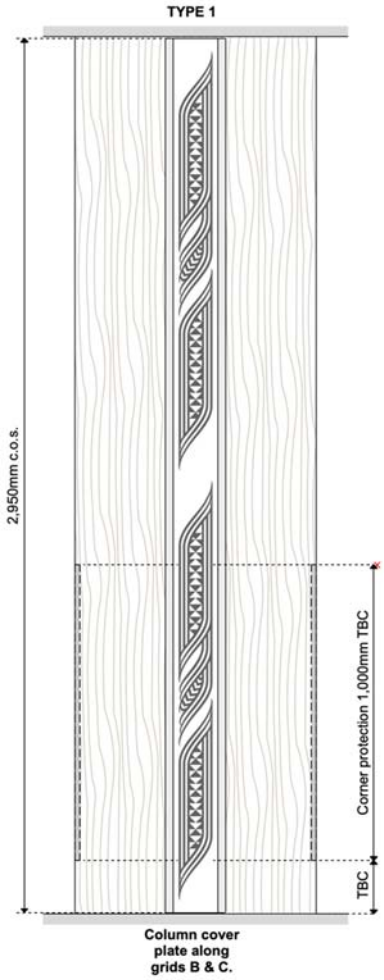

Figure 16. Example of engraved metal coverplate on a number of structural columns in MUS.