

**BEFORE A HEARING PANEL OF  
WELLINGTON CITY COUNCIL**

**IN THE MATTER**

of the Resource  
Management Act  
1991 (the **Act**)

**AND**

**IN THE MATTER**

of the Wellington City  
Proposed District  
Plan

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**EVIDENCE OF PETER ALAN COOP ON BEHALF OF PARLIAMENTARY  
SERVICE AND ITS SUBMISSION ON THE PROPOSED DISTRICT PLAN**

**CITY CENTRE ZONE**

**PLANNING**

**12 May 2023**

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## **1. INTRODUCTION**

**1.1** My full name is Peter Alan Coop and I am a self-employed resource management consultant.

**1.2** This statement of evidence relates to the hearing on submissions with respect to Part 3 – Area-Specific Matters – Zones – Commercial and mixed use - City Centre Zone. I am authorised by the Parliamentary Service to give this statement of evidence on its behalf.

## **2. QUALIFICATIONS AND EXPERIENCE**

**2.1** My qualifications are a Bachelor of Arts, Diploma of Town Planning, and a Master of Public Policy.

**2.2** I have over 40 years' experience in town planning/resource management. This includes 7 years as Wellington City Council's manager of resource consents and 6 years as the Council's manager of strategic planning and policy development. For the last 25 years I have worked as a resource management consultant for Urban Perspectives Ltd and since 2022 in self-employment.

**2.3** My experience has included the preparation of numerous applications for resource consents, applications for private District Plan Changes, submissions on Proposed Plans, and the preparation and presentation of expert evidence at Council, Board of Inquiry and Environment Court hearings.

**2.4** For the last 6 years I have provided resource management advice and assistance to Parliamentary Service in relation to proposed development of the Parliamentary Precinct, the applicable operative statutory provisions, and the Council's Proposed District Plan (PDP).

## **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 my evidence to the hearing panel. I confirm that I consider that the issues addressed in my 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 will cover the following matters:

- (a) The significance and importance of the Parliamentary Precinct;
- (b) The submission of Parliamentary Service on the City Centre Zone provisions of the PDP; and
- (c) My comments on the Council officer report on Hearing Stream 4 – the City Centre provisions.

**4.2** In preparing this statement of evidence, I confirm that I have read the following documents:

- (a) Parliamentary Service's submission and further submission;
- (b) The notified Part 3 – Area Specific Matters – Zones – Commercial and mixed use - City Centre Zone chapter;
- (c) The Wellington City Proposed District Plan Hearing Stream 4 – City Centre Zone report, prepared under section 42A of the Resource Management Act 1991 (**the Section 42A Report**) and its associated appendices (insofar as it relates to the City Centre Zone).

**4.3** I have previously given evidence to the Hearing Panel on behalf of Parliamentary Service in relation to hearing stream 3 on the Historic Heritage provisions. My previous evidence related to the Parliamentary site being a Heritage Area and being occupied by heritage buildings. This evidence is focused on the City Centre Zone provisions that may apply to the Parliamentary Precinct, but the reasons for the changes sought

are the same as that outlined in hearing stream 3 – namely, that the Council's District Plan needs to recognise and provide for the unique requirements and importance of the Parliamentary Precinct.

## **5. THE SIGNIFICANCE AND IMPORTANCE OF THE PARLIAMENTARY PRECINCT**

**5.1** As outlined in my earlier evidence to the Panel, the Parliamentary Precinct is of significant importance to Wellington. It is why Wellington, unlike any other city, is the Capital City of New Zealand. The Precinct accommodates Parliament, the Executive, Members of Parliament, and ancillary functions and services. It is also why Wellington accommodates the wide range of Government Departments, Consulates, businesses and service organisation's that are essential to Wellington's economy, cultural life and wellbeing.

**5.2** The Precinct has been progressively developed and redeveloped over many years to try and keep pace with the evolving democratic needs of New Zealand. This has included the demolition of buildings that have become too small, additions to existing buildings (such as the Parliamentary Library) to add floorspace, the construction of new buildings (the last one being the Executive Wing), and alterations to accommodate changing circumstances (for example security).

**5.3** Parliament has committed itself to its Future Accommodation Strategy which includes two new buildings behind Parliament House. Resource consent has been applied for, publicly notified, a hearing held, and a decision is awaited. The Strategy also involves other proposed buildings and structures, and the planning provisions that apply to the Precinct need to enable the Precinct's evolution.

## **6. PARLIAMENTARY SERVICE'S SUBMISSION**

### *A Parliamentary Precinct*

**6.1** The Parliamentary Precinct is unique and different from other City Centre landowners and/or occupiers. For example, for safety, security and confidentiality reasons, only Parliamentary activities are able to be

accommodated on the Precinct. Non-Parliamentary activities, for example residential apartments and commercial activities (i.e. private sector office floorspace) cannot be accommodated on the Precinct. It is therefore not appropriate for the Precinct to be subject to the same planning provisions as other areas in the City Centre Zone.

**6.2** I therefore consider that the Council's District Plan should recognize and provide for the unique importance of the Parliamentary Precinct, with specific provisions that anticipate and provide for the evolution of the Precinct, and to also symbolically demonstrate that the Council recognizes that the Precinct is not "just another part of the City Centre Zone".

**6.3** Through the Te Ngākau Civic Square Precinct, the PDP recognizes that the block of land owned by the Council and intended for civic centre activities is important enough to deserve special recognition under the City Centre Zone, with specific objectives, policies and rules. I consider that the Parliamentary Precinct is as important as, and indeed more important to the future of the City (and the country) than the Council's Civic Square Precinct.

**6.4** In my view, the Parliamentary Precinct should therefore be accorded similar recognition under the City Centre Zone with specific objectives, policies and rules by way of the introduction of a Parliamentary Precinct.

## **7. COMMENTS ON THE SECTION 42A REPORT**

**7.1** The officer's report recommends against this for the reason that the Parliamentary Precinct is "protected by its own Heritage Area" under the PDP. While the management of heritage within the Precinct is an important matter that is dealt with by the Heritage provisions of the PDP, those provisions serve a fundamentally different purpose from what Parliamentary Service is seeking. The heritage provisions are protective of the existing buildings, rather than enabling of Parliamentary activities. It is more important in my view that there are PDP provisions that permit Parliamentary activities and provide for the continued development and evolution of the Precinct so that it can meet the future needs of Parliamentary democracy in New Zealand.

**7.2** I therefore support the recommendations of the officer's report in paragraph 793 to include specific provision that "parliamentary activities" are a permitted activity. Where I differ from the s42A officer is that I also continue to support the introduction of a Parliamentary Precinct into the PDP, for the reasons outlined above.

*Ambiguity in the applicable height standards*

**7.3** I note that CCZ-S4 requires a minimum height of (presumably new) buildings in the City Centre Zone to be 22m and provides an exemption for the Council's Civic Square Precinct. For the reasons set out above, this standard should also not apply to the Parliamentary Precinct – particularly because it would be inconsistent with the nature and use of the Precinct to require every new building to be 22 metres high.

**7.4** The intent of the PDP appears to be that HH-S4, the building height standard from the Historic Heritage chapter applies to the Parliamentary Precinct, instead of CCZ-S4, however I have been unable to identify anything in the PDP that explicitly states this. It is therefore possible that for any development on the Parliamentary Precinct in the future, particularly for new buildings on the precinct, there would be an ambiguity as to whether the presumption was that it must be 22 metres tall.

**7.5** To address this ambiguity, in my view either an exemption should be added to CCZ-S4 to this effect, or confirmation included in the PDP that the building height standards of the CCZ do not apply to sites within Heritage Areas, because building height standards for sites in Heritage Areas are contained in the Historic Heritage Chapter of the PDP. A new Parliamentary Precinct and related enabling provisions would be a further (and my preferred) way of providing this clarification.

**Peter Alan Coop**

**12 June 2023**