

Heritage Advisor Assessment on Resource Consent Application

26 April 2023

Service Request No: 528330

Site Address: 1-23 Tasman Street, Mt Cook

Introduction

Qualifications

1. My full name is Francesca Louise Stevens. I practice under my abbreviated name, Chessa Stevens. I am Principal Conservation Architect and National Built Heritage Lead at WSP New Zealand Ltd.
2. I have the following qualifications and experience relevant to the evidence I shall give:
 - a. I hold a Master of Arts with Distinction in Conservation Studies from the University of York, United Kingdom.
 - b. I hold a Bachelor of Architecture with Honours from Victoria University of Wellington, New Zealand.
 - c. I hold a Bachelor of Arts degree from Victoria University of Wellington, New Zealand.
 - d. I am a Registered Architect with the New Zealand Registered Architects Board.
 - e. I am a member of the Executive Board and Co-Secretary of ICOMOS New Zealand (the International Council of Monuments and Sites).
 - f. I have approximately fifteen years' experience in architecture, specialising in heritage and historic buildings.
 - g. I have been employed in a specialist built heritage role at WSP (formerly Opus International Consultants) since 2015.
3. I have been engaged by Wellington City Council to assess the heritage effects of the Resource Consent Application by One Tasman Development Limited Partnership for 1-23 Tasman Street, Mount Cook, Wellington.

Expert Witnesses – Code of Conduct

4. I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that except where I state I am relying on information provided by another party, the content of this evidence is within my area of expertise.

Background

5. 1 Tasman Street is occupied by a number of existing buildings that make up the Tasman Gardens Apartments, including the six-storey apartment block and ten two-story townhouses fronting Tasman Street. 23 Tasman Street was a residential house that has been converted for commercial use and is now vacant.
6. The site does not contain any individually listed heritage buildings, nor is it in a heritage area. However, there are a number of significant heritage items in close proximity:
 - a. Former National/Dominion Museum 1933-36, 7 Buckle Street (16/40)
 - b. National War Memorial and Carillon 1931-32, 1960-64, 7 Buckle Street (16/41)
 - c. Mount Cook Police Station and retaining wall 1894, Buckle Street/corner Tasman Street (16/43)
 - d. Brick Wall c1894, Tasman Street (16/54)
 - e. Home of Compassion Creche (former) 1914, Buckle Street (16/42)
 - f. Former Army Headquarters Building 1911-12, Buckle Street/corner Taranaki Street (16/424)
 - g. Museum Stand, Basin Reserve 1924, 2 Rugby Street (16/449)
 - h. William Wakefield Memorial pre-1890, Dufferin Street (16/11)
7. All of these items are also individually listed with Heritage New Zealand Pouhere Tāonga (HNZPT) and are included in either Schedule 1 or 2 of the Proposed District Plan (PDP). HNZPT has also listed the Basin Reserve Historic Area which is encompassed within Sussex, Buckle, Ellice, Dufferin and Rugby Streets. A similar area is identified for inclusion in Schedule 3 of the PDP as the Basin Reserve Heritage Area (37).
8. Together with their surroundings, these buildings, structures and areas are part of a wider and nationally significant heritage landscape that was identified in the *Final Report and Decision of the Board of Inquiry into the Basin Bridge Proposal* as extending from Taranaki Street in the west to Government House in the east, and is of the highest level of national significance. Of particular note are the former National/Dominion Museum and National War Memorial and Carillon, which were composed and built in conjunction. Together, they are a significant landmark sited on the northern slopes of Pukeahu and visible from many parts of the city and the hills around. The landmark status of these buildings – particularly the Carillon – and the relationship between them are a fundamental feature of the heritage landscape.
9. In October 2021, One Tasman Development Ltd Partnership lodged a resource consent application for a proposed a comprehensive redevelopment of the site at 1-23 Tasman Street, including:
 - a. demolition of the existing buildings and the preparation of the site (principally earthworks) for the construction of the new buildings;
 - b. the erection of site hoardings (which will have some site management/marketing information - see Section 2.2.1 below);
 - c. construction of new buildings comprising:
 - i. 3-storey terrace houses, five fronting Old Buckle Street and four on the corner of Old Buckle Street and Tasman Street;

- ii. eight 2-storey terrace houses situated above the central carpark;
 - iii. a 10-storey base-isolated building at the northern end of the site with 104 apartments;
 - iv. a 9-storey base-isolated building at the southern end of the site with 92 apartments;
 - v. a café in the ground floor unit on the corner of Old Buckle Street and Tasman Street;
 - a. onsite parking and servicing/loading areas, both accessed from Tasman Street;
 - b. landscaping to both street frontages and an internal central courtyard.
10. As 1-23 Tasman Street is within the Central Area as defined in the Operative District Plan (ODP), and parts of the proposed development did not comply with the specified standards for this Area, it was necessary to assess the effects on the historic heritage value of the scheduled heritage items in the vicinity.
11. In my Heritage Advisor Assessment dated 22nd November 2021 I concluded that the proposal was not supported on heritage grounds as follows:

The former National/Dominion Museum and National War Memorial and Carillon were composed and built in conjunction. Together, they are a significant landmark sited on the northern slopes of Pukeahu and visible from many parts of the city and the hills around. The landmark status of these buildings – particularly the Carillon tower – and the relationship between them are obscured and diminished by the proposed development when viewed from the east. The skyline along Pukeahu ridge would be permanently altered by the proposal. The towers interrupt viewshafts that, while they are not formally protected features, may be regarded as important established views with some significance in the overall heritage landscape.

Further, the Carillon tower is partially – and in some cases entirely - obscured from view from key vantage points such as Ellice Street, the intersection of Buckle and Ellice Streets with Kent and Cambridge Terraces, and within the Basin Reserve. From these perspectives the proposal does not respect the symbolic status of the Carillon and National War Memorial.

12. To ensure that the former National/Dominion Museum and National War Memorial and Carillon and their relationship remain the dominant feature of this nationally significant site, any development at 1-23 Tasman Street must be of a scale and design that recedes within the heritage landscape.
13. Following discussion with Council Officers, the Applicant amended the proposal, and lodged this amendment in September 2022. The changes made in the amended proposal, referred to as “Alternative 2”, consisted of:
- a. reduction in the height of the Northern Apartments from 10 storeys to 8 storeys;
 - b. reduction in the height of the Southern Apartments from 9-storeys to 5 storeys;
 - c. the colour of the cladding of the Southern Apartments from white to “more neutral greys”.

14. I reviewed the amended application in my Addendum to the Heritage Advisor Assessment dated 9th September 2023. In this Assessment I concluded that:

“Alternative 2” allows the relationship between the Carillon and the former Museum to be read within the heritage landscape from these views from long established views, including from the Mt Victoria Tunnel across the Basin Reserve, and from within the Basin Reserve itself, because the Southern Apartments are set at a height of 5 storeys. The view of the Carillon and former Museum from the intersection of Buckle and Ellice Streets with Kent and Cambridge Terraces is still substantially obscured by the Northern Apartments; however, it is acknowledged that a development to 18m in height on this site would also be likely to obscure this view. The Northern Apartments also affect the setting of Pukeahu Park and the Home of Compassion Creche at the eastern end of the Park.

*Based on the above assessment, “Alternative 2” is considered to be acceptable on heritage grounds, **but it is very finely balanced.** Any changes to “Alternative 2”, **particularly changes in the height, bulk and mass of the Northern and Southern Apartments,** are likely to **increase negative heritage effects.***

15. Resource consent for “Alternative 2” was granted on 15 December 2022 (SR 500876).
16. The current application is for a development similar to the October 2021 proposal, with the height of the northern building increased to 10 storeys and the height of the southern building increased to 9 storeys with white cladding. Therefore, in preparing this Heritage Advisor Assessment for the application, I refer to or reiterate sections of my Heritage Advisor Assessment for SR 500876 dated 22nd November 2021, and my Addendum to the Heritage Advisor Assessment for SR 500876 dated 9th September 2022.

Heritage Values of Items in the Vicinity

17. A full description of each of the heritage items and areas in the vicinity of the proposed development can be found in the Wellington City Heritage Inventory, the HNZPT List online, and the ODP Central Area Urban Design Guide (CAUDG). With regards to the proposed development, the following values for each item are of particular relevance:
- a. The former National/Dominion Museum and National War Memorial and Carillon were built in conjunction and lie on a formal axis that was originally planned to extend into a tree lined boulevard to Courtenay Place.
 - b. The National War Memorial is a monument of national as well as citywide significance. It is important to retain this significance, and to respect the formal and spatial composition of the Carillon and National War Memorial as a whole. Its symbolic status must also be recognised and maintained.
 - c. Together, the former National/Dominion Museum and National War Memorial and Carillon are a significant landmark sited on the northern slopes of Mt Cook (Pukeahu) and visible from many parts of the city and the hills around.

- d. The Mount Cook Police Station and its associated brick yard-walls have a strong stylistic and historic association with the adjoining Tasman Street Brick Wall.
- e. The former Police Station complex, the Tasman Street Brick Wall, and the former Army Headquarters are part of military, penal and museum history of Pukeahu/ Mt Cook and can therefore be seen as a group along with the nearby National War Memorial and Carillion, and the former National/Dominion Museum.
- f. Both the former Police Station and Army Headquarters buildings are prominent for their corner locations, and provide definition to the frontage of the National War Memorial and boundaries at Tasman and Taranaki Streets.
- g. The former Police Station is visible from a number of different viewshafts in the area due to its corner site.
- h. The former Home of Compassion Creche is the only building left on the north side of the Buckle Street block between Taranaki Street and Cambridge Terrace, and provides significant townscape value to the area surrounding the Sussex Street intersection.
- i. The Museum Stand is a prominent item within the Basin Reserve Historic Area, and is a landmark structure both within and without the Reserve.
- j. The Wakefield Memorial is a distinctive structure that has landmark value at a prominent intersection, and is an important element of the Basin Reserve as the oldest surviving structure in the complex.
- k. The Basin Reserve has an integrity of form that goes back to its 19th century origins, and provides open views in and out.
- l. All of the above places are part of a wider heritage setting that was identified in the *Final Report and Decision of the Board of Inquiry into the Basin Bridge Proposal* as extending from Taranaki Street in the west to Government House in the east.

18. The site of the Proposal is known to have been associated with human habitation prior to 1900, and therefore it is afforded protection under the HNZPT Act 2014.

Legislative Requirements (District Plan / Standards)

19. The ODP Central Area Rules apply.

20. For the construction of new buildings in the Central Area, consent is required under 13.3.4 in relation to:

13.3.4.1 *design, external appearance and siting*
 13.3.4.2 *the placement of building mass.*

21. Building work covered by rule 13.3.4 is assessed against the provisions of the Central Area Urban Design Guide (CAUDG).

22. As the proposed new building does not comply with one or more of the standards outlined in Section 13.6.1 (activities, buildings and structures) and Section 13.6.3 (buildings and structures), consent is required under Rule 13.3.8 in relation to the effects generated by the standard(s) not met. The standards not met by the proposal are in relation to:

13.3.8.3 *servicing and site access*
 13.3.8.4.A *height limit*

13.3.8.8 wind

23. Condition 13.3.8.14 states that the maximum building height must not exceed more than 35% and the building mass standard must not be exceeded (or that neither the height nor mass are exceeded by more than 15%). In this case, the building mass standard for the site is exceeded. Therefore, condition 13.3.8.14 under Rule 13.3.8 is not met.
24. Where the breach is related to height (standards 13.6.3.1 to 13.6.3.1.4, and 13.6.3.1.7 to 13.6.3.1.10) or mass (Standard 13.6.3.2) discretion is limited to the effect of building height and mass on:
- *the amenity of surrounding streets, lanes, footpaths and other public spaces; and*
 - *the historic heritage value of any listed heritage item in the vicinity; and*
 - *the urban form of the city; and*
 - *the character of the surrounding neighbourhood, including the form and scale of neighbouring buildings; and*
 - *any adjacent Residential Area*
25. Although the PDP City Centre Zone (CCZ) objectives and policies do have weight, the rules do not yet apply.

Assessment

Summary of Applicant's Assessment of Environmental Effects

26. The Applicant's Assessment of Environmental Effects (AEE) has been prepared by Urban Perspectives. The AEE states that:
- ... the development does not require consent under the District Plan's heritage rules, both the ODP and the PDP, as there is no direct physical effect on any listed heritage item, and the site is not within or adjacent to a listed heritage area. Rather, the context for the assessment of any heritage effects is the effect of building height on: the historic heritage values of any listed heritage item in the vicinity.*
27. This statement is correct as it relates to the ODP and PDP rules, and insofar as "direct physical effect" refers to physical intervention into the built fabric of a listed heritage item. This is not, nor has it ever been, a matter of contention. As I have clearly stated above, it is the ODP Central Area Rules that apply.
28. With regards to heritage, the AEE relies on the Assessment of Effects on Heritage (AEH) prepared by Archifact, and a peer review of the AEH by Richard Knott (titled Independent Historic Heritage Review). The Urban Design Assessment prepared by Urban Perspectives, and the Cultural Impact Report prepared by Raukura Consultants are also relevant.
29. The AEH states:
- The proposed massing, height, scale and proportions, architectural forms, detailing, and materiality of the new development is designed to respect and be sympathetic to the nearby heritage. The varied architectural massing and relationship of the various built forms within the site have been carefully*

considered so that the proposed development sits appropriately within the site, maintains the characteristic mixed-grain of the surrounding existing context, and does not dominate the surrounding heritage elements. The proposed height is a site-specific response to the particular and distinctive topography of the site.

30. Correspondingly, the AEE identifies:

- *overall site planning including the separation of the apartment forms to manage and break-up the perception of greater building mass on the site;*
- *the incorporation of lower building forms on the Old Buckle Street/Tasman Street corner to respond to the lower scale of the historic former Mount Cook Police Station;*
- *alignment of the apartment building forms with the historic Te Aro (Heaphy) grid;*
- *achievement of an appropriate scale transition and relationship with the adjoining Pukeahu National War Memorial Park public space - it does not dominate the space, but provides a sense of enclosure to the space;*
- *while adjacent to the Pukeahu National War Memorial Park public space, One Tasman Pukeahu Park does not result in any severance of the park from its wider setting; and*
- *with the Carillon being significantly higher than the proposed apartment buildings, it remains the primary skyline element*

as being principal considerations leading to the overall conclusion made in the AEH that the effects on heritage values are less than minor. I accept that using a mixture of forms, mass and proportions as proposed in the development is an effective way of managing the relationship between the buildings and the surrounding context in this case. Nevertheless, the proposed increase in height of the apartment towers means that these buildings become dominant within the heritage landscape and obscure heritage items from certain viewpoints.

31. The AEH continues:

The collection of heritage elements grouped on and around the ridge and slopes of Pukeahu/Mount Cook including the National War Memorial, the former Dominion Museum, the former Mount Cook Police Station building and the Tasman Street wall on its eastern boundary, and the former Army Headquarters Building to the west can be considered collectively, in conjunction with the Pukeahu National War Memorial Park public setting to the north, to describe a collective heritage context. The proposed development sits adjacent to, but outside of, this important setting. The proposed scheme respects and maintains the character and significance of the individual and collective heritage elements and enables their continued appreciation and interpretation.

32. As noted above, the AEE adds that the proposal “does not dominate” Pukeahu National War Memorial Park, but “provides a sense of enclosure to the space”; and “does not result in any severance of the park from its wider setting”.

33. I accept that the proposal sits on the periphery of the setting described in the AEH, which is consistent with the setting identified in the Heritage Inventory

entry for the former Army Headquarters. I accept that the proposal does not unduly dominate that setting, or sever Pukeahu National War Memorial Park from that setting. However, the proposed development is in the middle of a wider heritage setting that was identified in the *Final Report and Decision of the Board of Inquiry into the Basin Bridge Proposal* as extending from Taranaki Street in the west to Government House in the east, taking in all of those heritage items identified above, as well as the Basin Reserve Historic Area.¹ Therefore, the impact of the proposal on this wider setting, (and not just the setting to the west) needs to be considered.

34. The AEH identifies the orientation and configuration of the apartment towers as mitigating the impacts that the proposal may have on the heritage values of the Carillon tower:

The National War Memorial's Carillon tower is significantly higher than the proposed development and remains the primary skyline element that will be visible from the Te Aro Valley and the wider Wellington context. The focal status of the Carillon tower and the National War Memorial is reinforced in the configuration of the apartment towers across the site: the bulk of the apartment blocks have been separated in two, with the threshold aligned on the historic Te Aro (Heaphy) grid axis using the Carillon tower as the reference for the axis. The separation of the north and south apartment blocks also maintains sightlines from the Mount Victoria Tunnel exit.

35. I accept that orientating the development to the “Heaphy” or Te Aro grid, using the Carillon tower as a reference, is appropriate in this case. It is also a statement of fact that the proposed towers are not as tall as the Carillon tower. However, both towers exceed the current central area height limit (18.6m) and the height limit proposed in the PDP (28.5m). The townscape views provided with the Application demonstrate that the height of the towers from certain viewpoints, particularly from the east, appears to be similar to the Carillon tower and/or obscures the view of it entirely. While the Carillon tower remains visible from the Mt Victoria Tunnel exit, it is sandwiched between the two proposed towers.

36. The AEH concludes that:

Overall, the proposed works demonstrate a commitment to respecting, maintaining, and enhancing the nearby heritage buildings, and the wider heritage and urban context, providing a positive and appropriate outcome with a resultant less-than-minor adverse effect on heritage values. The proposed One Tasman Pukeahu Park development at 1 & 23 Tasman Street represents an appropriate and supportable scheme that respects the identified historic heritage values of the adjacent and nearby heritage buildings, elements, and spaces, minimises effects, and enhances those values and the wider public benefit.

37. The conclusion that the proposal will have “a less than minor adverse effect on heritage values” is corroborated by Richard Knott in his Independent Historic Heritage Review, which states:

Having visited the site, considered the proposed plans, Archifact Assessment and WCC Review, I consider that the proposed development will maintain

1. ¹ Refer to paragraphs 597, 598 and 1328 of the Decision

the values of its wider heritage setting. Overall, the effects of the proposal on historic heritage will be less than minor.

38. I do not agree that the adverse effect on heritage values in this case is “less than minor”.

Effects on Heritage Values

39. Rules 13.3.4 and 13.3.8 refer to section 12.2 of the ODP for relevant policies against which resource consent applications should be considered under these rules. Policies in sections 12.2.4 to 12.2.6, and the provisions of the CAUDG, have assisted me to determine whether the effects of the proposed development on heritage items in the vicinity are acceptable.
40. Although the PDP CCZ rules do not yet have effect, the objectives and policies do have weight. Therefore, policies CCZ-P9 and CCZ-S1, and the provisions of the Design Guide for Centres and Mixed Use (CMU) have further assisted me to determine the acceptability of the proposal.
41. I have also used Heritage New Zealand’s *Sustainable Management of Historic Heritage Guidance Series* and the *Final Report and Decision of the Board of Inquiry into the Basin Bridge Proposal* to inform my assessment.

Operative District Plan

Policy 12.2.4.5 ***Ensure that development within the Te Aro Corridor assists to integrate the inner city bypass in to the urban fabric of southern Te Aro.***

42. The Te Aro Corridor Design Guide, provided in Appendix 2 of the CAUDG, applies to Buckle Street from the Basin Reserve through to Taranaki Street. The guide places emphasis on the role of the “National War Memorial Area”, identifying three key objectives for the Design Guide, which are discussed further below.

(TA) O1.1 ***To retain the landmark significance of the Carillon and National War Memorial, and respect its symbolic status.***

43. The landmark significance of the Carillon and the National War Memorial looking along Buckle Street from Taranaki Street and from within the western part of Pukeahu National War Memorial Park is not significantly changed by the proposed development. Although more visible than the existing apartment building, the height of the Carillon, and the changes in ground level and associated plantings of Pukeahu National War Memorial Park mean that the proposed building is not dominant from the west. However, from the eastern part of Pukeahu National War Memorial Park, the proposed north tower dominates the foreground because of its height, reducing the landmark significance of the Carillon tower.
44. Several statements made in the AEH in relation to TA O1.1 are later repeated in the document in relation to other objectives, policies and guidelines. I respond to them here, and refer back to them throughout my Assessment.
45. The AEH states:

- *The Carillon tower is significantly higher than the proposed development and remains the primary skyline element that will be visible from the Te Aro Valley and the wider Wellington context.²*
- *A deliberate half-bay stepdown at the south end of the Northern Apartment block frames the views towards the Carillon tower element and enhances its prominence, particularly when seen from the Basin Reserve and the Mt Victoria tunnel exit.³*

46. It is a statement of fact that the apartment towers as proposed are not as tall as the Carillon tower. However, with regards to the “wider Wellington context” the townscape views provided in the Application clearly demonstrate that the landmark significance of the Carillon from the east will be diminished by the two proposed towers at 9 and 10 storeys in a way that they are not diminished by the consented development (with towers at 5 and 8 storeys) (refer to Figure 1 to **Figure 4**). The design of the towers certainly do not “enhance” the prominence of the Carillon when the development is viewed from the Basin Reserve and the Mt Victoria Tunnel. Rather, it appears to be squeezed between the towers, and does not read as being “significantly higher” than the proposed development or as the “primary skyline element”. The “half-bay stepdown at the southern end of the Northern Apartment block” makes little, if any, difference to these effects. Further, the visual connection between it and the former National/Dominion Museum on the Pukeahu ridgeline is interrupted, which is discussed further below.



Figure 1: Visualisation of the consented development from the Mt Victoria Tunnel exit (Townscape View 01)



Figure 2: Visualisation of the proposed development from the Mt Victoria Tunnel exit (Townscape View 01)



Figure 3: Visualisation of the consented development from the Basin Reserve (Townscape View 04)



Figure 4: Visualisation of the proposed development from the Basin Reserve (Townscape View 04)

47. The AEH states:

2. ² Repeated in relation to TA O1.2 and CCZ P9 2(a)(iii).
 3. ³ Repeated in relation to CCZ P9 2(a)(iii) and CMU G8

- *The focal status of the Carillon tower and the National War Memorial is reinforced in the configuration of the apartment towers across the site: the potential bulk of the apartment tower blocks has been separated in two, with the threshold aligned on the historic Te Aro grid axis using the Carillon tower as the reference point for the axis.*⁴
- *The variation and modulation of building types, mass, and heights within the overall development provides a positive skyline articulation to the proposed scheme that breaks up the visual bulk and responds to the finer-grain characteristics of the existing context.*⁵

48. Similar points are raised by Richard Knott in his assessment of the proposal against the ODP policies and objectives as follows:

- *The utilisation of two towers, rather than a single large mass, assists with reducing the apparent bulk and mass of the development.*
- *The placement of the towers and the gap between them, and the provision of lower scale buildings on the frontage of the site to the National War Memorial Park ensures that the heritage values of the wider setting is maintained.*
- *The alternative of lower buildings which present a longer uninterrupted horizontal built form ... would be at odds with the vertical emphasis of the Carillon.*

49. As stated in my Summary of Applicant's Assessment above, I accept that orientating the development to the "Heaphy" or Te Aro grid, using the Carillon tower as a reference, and that varying the bulk, height and mass of buildings across the site, including the use of separate towers and lower scale terraced housing, is an appropriate response to the heritage landscape in which the development is set. Both of these are features of the consented development. However, the arrangement of the buildings on the site, their mass and height, struck a very fine balance in the consented development. The notable difference in height and modulation of the Northern and Southern Apartments in the consented development helped to reduce the visual bulk and mass of the towers, responding to the finer grain of the surrounding landscape and limiting the extent to which the development impacted the focal status of the Carillon. By increasing the height of the Northern and Southern Apartments, the proposed development would effectively undo what was successfully achieved in the consented design.

50. Refer to further discussion under 12.2.5.3 and 12.2.5.4 below.

51. The AEH states:

The design of the individual apartment tower roofs is simple, clean, and unarticulated, with roof clutter minimised. This allows them to be viewed as 'ground' with the Carillon tower beyond as the figural element.

52. I support the reduction of roof clutter and the use of clean rooflines generally as a means of minimising the aesthetic impact of new developments, especially where these can be looked upon from elevated positions.

4. ⁴ Repeated in relation to CCZ P9 2(a)(iii)

5. ⁵ Repeated in relation to Policy 12.2.5.3 and CCZ P9 2(a)(iii)

53. The height of the Southern Apartments in the consented development meant that this building sat within the treeline to the immediate east of the former National/Dominion Museum. This, combined with the recessive colour palette, meant that this tower could be read “as ground” from elevated positions on the eastern side (including from the Mt Victoria Tunnel), preserving the visible relationship between the former National/Dominion Museum and the Carillon tower. Even from within the lower viewpoint of the Basin Reserve, the consented Southern Tower was low enough to be read, if not “as ground”, then at least as recessive. This effect is lost with the proposed increase in height from 5 to 9 storeys, and is not alleviated by the “clean and unarticulated” roofline.
54. The height of the Northern Apartments in the consented development meant that the Carillon tower remained clearly visible beyond the development from views along Ellice Street. With the proposed increase in height from 8 to 10 storeys, the Carillon tower is obscured to a far greater extent.
55. The AEH states:

The view of the Carillon from the Mount Victoria tunnel exit is not a protected formal viewshaft (as recognised in the ODP). More particularly it is not a formal view as intended by the original design of the National War Memorial. The formal view is from the north and includes the former Dominion Museum as a foil to that view. Nonetheless, a clear sightline from the Mount Victoria tunnel exit is maintained through the distribution and separation of the apartment tower masses.

56. I acknowledge that the views of the Carillon from Mt Victoria or across the Basin are not necessarily “formal” views “intended by the original design” which focussed on a north-south axis.
57. However, the “formal” views “intended by the original design” required an avenue to be created in a straight line from Courtenay Place to the National War Memorial, and this was never realised. Meanwhile, the views from Mt Victoria have become established over the course of 90 years.
58. I recognise that there is no protected viewshaft towards the Carillon from the Mt Victoria Tunnel in the ODP. In October 2021, as part of approving the Draft Wellington City District Plan for consultation, WCC’s Planning and Environment Committee requested officers to do more work to identify significant viewshafts for protection before the publication of the Notified District Plan (the PDP), including significant views to and from the Carillon and the Basin Reserve. WCC officers had a selection of viewshafts independently assessed by Isthmus against WCC’S criteria for inclusion in in the PDP. In their *Assessment of Views for Possible New Viewshafts in the Draft District Plan* (May 2022) Isthmus stated:
- a. *(4.11) A clear view of the Carillon (sic.) is gained from the walking/cycling route at the tunnel portal, and it is a visible along the path, as it descends towards the Basin Reserve and city. The view has importance in the city context due to its location on a key walking/cycling/commuting route, at a key entry point to the city from the east, and due to the iconic nature of the Carillon (sic).*
 - b. *(4.14) The former National Museum building (now part of Massey University) is a further important landmark element in the view,*

particularly as seen together with the Carillion, as part of the historic context of the City.

- c. (4.16) Isthmus does consider it important to maintain the visual relationship between the former National Museum and the Carillion, in views from the Mt Victoria tunnel walkway/cycleway. The relationship is reinforced by the western hills and skyline, visible between the buildings. It may be possible to protect the buildings' visual relationship with inclusion of a panoramic viewshaft, including both the Carillion and the former Museum, with identification of the relevant continuum elements (hills and skyline).

59. Isthmus did not consider such a viewshaft to be suitable on the grounds that it was possible for a new development to be designed in such a way that it was suitable **“so long as it provided for maintenance of the visual relationship between the two buildings”**. They therefore recommended two viewshafts “to take in visible parts of the landmark buildings (Carillion and former National/Dominion Museum), as seen in the existing environment”.
60. Reporting on the work undertaken by Isthmus to consider new viewshafts for the PDP, WCC stated:

*Clear views of **the Carillion and Massey University/former National Museum** are gained from the main walking/cycling connection between the eastern suburbs and the city, at a key entry point to the city from the east, with views continuing for walkers/cyclists along the route as it descends towards the Basin Reserve and city. **Both buildings are city landmarks with historic and heritage value, are highly recognisable, and can be considered iconic.***⁶

61. Ultimately, the reporting officer for WCC took the position that a viewshaft should not be included in the notified PDP. However, in arriving at this conclusion, the officer stated:

*The proposed district plan will ensure that new development responds to the heritage values of those listed items around and finds a balance of development and protection. **Accordingly, the height of new development is proposed to be limited to 28.5m on sites to the east of the Carillion and War Memorial Museum to ensure a compatible scale of development that still allows for appreciation of the form of these buildings.** This is an increase from 25m (maximum height 18.6m plus 35% height exceedance enabled under Central Area rules) in the Operative District Plan, recognising the imperatives of the NPS-UD to enable maximum development capacity. **It is less enabling than heights in Te Aro and Adelaide Rd (42.5m).***⁷

62. Although not providing specific protection for a viewshaft or viewshafts, this conclusion supports the position that the view of the Carillion tower and the former National/Dominion Museum is both significant and relevant to the heritage value of these places; and that it is therefore necessary to limit the height of developments around these places in order to prevent the erosion of this view and its associated values.

6. ⁶ Emphasis added.

7. ⁷ Emphasis added.

63. In their *Assessment of Views for Possible New Viewshafts in the Draft District Plan* (May 2022) Isthmus also provided an assessment of the proposed development at 1-23 Tasman Street. At that time, the proposal was for a 10 storey Northern Apartment tower and a 9 storey Southern Apartment tower as per the Resource Consent Application lodged in October 2021. In carefully worded statements regarding the viewshaft to the Carillon,⁸ the Assessment asserts:

- a. *5.3 From the graphics provided, it appears that the proposed development would be likely to avoid the bottom margin of the recommended Carillion viewshaft, as the development proposes two buildings, situated either side of the Carillon. In the graphics provided, the proposal removes existing built development from the lower portions of the Carillon, and appears to reveal vegetation which may be part of Pukeahu Park.*
- b. *5.4 ... the proposed outcome could provide an improvement to the view of the Carillion, compared to the Draft District Plan's permitted height, if the permitted height resulted in a single building (as shown in the application's graphic simulations). From the applicant's graphics, the proposed development appears to reveal slightly more of the Carillion's lower portions, and associated vegetation.*
- c. *5.5 It is difficult to ascertain if the proposed development would intrude into the side margins of the viewshaft recommended in this report, focused on the Carillion. This is because the viewpoint used in the application (taken from the road through the tunnel) differs slightly from the viewpoint used for the recommended viewshaft (taken from the Mt Victoria walkway/cycleway, at the tunnel portal). If such intrusion occurred, it could conceal part/s of the Carillion in views from the Mt Victoria walkway/cycleway.*

64. With regards to the first part of the statement at paragraph 5.3, it is not strictly true that the development proposes two buildings “situated either side of the Carillon”. Rather, the proposed towers appear as if they are either side of the Carillon from the point at which Townscape View 01 presented in the Application is taken.



Figure 5: Visualisation of the current environment from the Mt Victoria Tunnel exit (Townscape View 01)



Figure 6: Visualisation of the proposed development from the Mt Victoria Tunnel exit (Townscape View 01)

8. ⁸ Note that this is not the same as the viewshaft to the former National/Dominion Museum or the combined viewshaft discussed by Isthmus.

65. With regards to the second part of the statement at paragraph 5.3 that the proposal “appears to reveal vegetation which may be part of Pukeahu Park”, the comparative views in **Error! Reference source not found.** and **Error! Reference source not found.** show that removal of the existing building may lead to a very small revelation of treetops at the base of the Carillon which is barely discernible due to the dominance of the Northern and Southern Apartments. There is no revelation of the Carillon’s lower proportions.
66. With regards to the statement at paragraph 5.4, it is noted that the impact of the proposal is being assessed against a hypothetical alternative rather than the existing environment and, therefore it is irrelevant.
67. With regards to the statement at paragraph 5.5, the Applicant has not provided a townscape view from the same position as the point from which the proposed viewshaft was taken, and therefore it is not clear whether the proposed development could conceal part/s of the Carillon in views from the Mt Victoria walkway or cycleway.
68. While I recognise that a sightline from the Mount Victoria Tunnel to the Carillon is maintained despite the increase in the height of the apartment towers proposed, this viewshaft is significantly narrowed with the Carillon being squeezed between the Northern and Southern Apartments, diminishing its landmark values. Further, the increase in height of the Southern Apartments severs the visible relationship between the Carillon tower and the former National/Dominion Museum.
69. The AEH continues:
- The proposed development makes no change to the significant symbolic values of the National War Memorial as “New Zealand’s foremost symbolic and commemorative building, a place of pilgrimage and ceremony, and of very high social value to the country.”⁹*
70. Given what I have outlined above, I do not agree that the proposed increase in height of the apartment towers “makes no change to the significant symbolic values of the National War Memorial”. The National War Memorial’s symbolic values are necessarily entwined with the landmark values of the Carillon. These landmark values are diminished by the proposed development, particularly from the eastern side, and there is an accompanying diminution in symbolic values. The townscape views provided in the Application clearly demonstrate that the increased height of the towers proposed will change the landmark status of the Carillon tower from views that have existed for decades.
71. The impact that the development will have on the symbolic, commemorative and social values of the building are also a concern raised by several submitters, as further discussed below.
72. With regards to the effects on the relationship of the proposal with Pukeahu National War Memorial Park, and the setting between the former Army Headquarters and the former Mount Cook Police Station, refer to my comments in the Summary of Applicant’s AEE.

9. ⁹ Repeated in relation to CCZ P9 2(a)(iii)

(TA) O1.2 To maintain an unobstructed ridge-top setting for the National War Memorial and good visual connections with the city.

73. The ridge-top setting of the National War Memorial, and the relationship between the Carillon tower and the former National/Dominion Museum building is obstructed by the proposed towers when viewed from the east.

74. The AEH states:

The visual connections with the city from the National War Memorial are heavily defined by the surrounding Pohutukawa planting on Pukeahu/Mount Cook. From the public realm around both the National War Memorial and the Dominion Museum atop the Pukeahu ridge, the dense Pohutukawa planting hides any views of the proposed development.

75. No comment is made in the AEH with regards to the treeline that leads from the northern side of the Basin Reserve up onto Buckle Street and the importance of this connection which is obscured by the proposal.

76. With regards to the statement made in the AEH that the Carillon tower is higher and therefore remains the primary skyline element visible from the “wider Wellington context” I refer to my comments under TA O1.1.

77. The AEH continues:

- *[the Carillon tower] is perceived and appreciated from a very dynamic context, and views towards the National War Memorial (and former Dominion Museum to a lesser extent) are revealed as the public move throughout the city, much the same as the existing condition hides and reveals the National War Memorial as one moves through the surrounding context.*
- *Views to the National War Memorial and former Dominion Museum from the east (and indeed the west) are part of the wider urban context that includes dynamic and changing views of the site as one traverses the city. It has been recognised that the views are dynamic and that complete visibility from all possible vantage points is not feasible. While there are side views to these elements, these are incidental and not part of the formal designed north-south axis.*
- *The incidental and dynamic glimpse of the tops of the Carillon and the former Dominion Museum as seen from the east when emerging from the Mount Victoria tunnel is not a formal or intended view (as recognised in the ODP). Nonetheless, a clear sightline from the Mount Victoria tunnel exit is maintained through the distribution and separation of the apartment tower masses.*
- *When seen from the east, the dense Pohutukawa planting hides most of the Dominion Museum building, leaving only the upper section and roof form visible. This appears even less prominent when read against the Town Belt hill backdrop.*

78. I acknowledge that views of the Carillon tower and the former National/Dominion Museum change depending on the viewpoint. I also recognise that ensuring “complete visibility” of the Carillon tower and the former National/Dominion Museum “from all possible vantage points” is not feasible, and I am not suggesting that this should be the case.
79. However, while the views of the Carillon and the former National/Dominion Museum from Mt Victoria or across the Basin Reserve were not necessarily an “intended” part of the buildings’ as they were designed, nor are they protected in the ODP or PDP, I do not agree that they can therefore be dismissed as “incidental”. These views have been established over 90 years, and their significance is further discussed under TA O1.1 above.
80. I acknowledge that the Pohutukawa planting on the slopes of Pukeahu have also become an important aspect of the Pukeahu ridgeline and, therefore, of the composition of the National War Memorial and the former National/Dominion Museum, as identified in the AEH. I believe this adds further credence to my position that it is important for the Southern Apartments, in particular, to recede into the existing treeline as per the consented development.
81. The townscape views provided in the Application clearly show that the relationship between the former National/Dominion Museum and the Carillon is easily discerned above the treeline on the Pukeahu ridge in the consented development. The obscuration of the relationship between these two heritage items that will be caused by the proposed increase in height of the Southern Apartments, in particular, is not mitigated by the corresponding “stepped height relationship” between the Northern and Southern Apartments (refer Figure 1 and Figure 2 above) that is referred to in the AEH. Further, the difference in height between the 10 storey Northern and the 9 storey Southern Apartments is almost imperceptible from the eastern side due to the position of the towers on the site and the perspectives from which they are perceived.
82. For further discussion regarding impacts on the landmark values of the Carillon tower and the legible relationship between the Carillon and the former National/Dominion Museum from the east, refer to TA O1.1 above, and to 12.2.5.2 below.

(TA) O1.3 *Maintain and enhance the built edge to the Buckle/Taranaki St intersection.*

83. The proposal does not impact on this intersection.
84. In his Independent Historic Heritage Review, Richard Knott challenges my application of the Te Aro Design Guide in my Heritage Advisor Assessment for SR 5000876. Mr Knott’s view is that, because the intention of the design guide was to influence the effects of development alongside the Wellington Inner City Bypass route (now recognised as Karo Drive, Buckle Street and the Arras Tunnel) it is not appropriate to use the Te Aro Design Guide to consider views from wider locations that fall outside this “boundary” and therefore outside of the “intent” of the Guide -
85. In principle I disagree as, if a boundary were to be strictly applied in this sense, there would be no requirement to consider “good visual connections with the city”. I note also that the AEH assesses the proposal from the east using the Te

Aro Design Guide; and, in this respect, I have provided a commentary in response.

86. However, even if it was to be concluded that the Te Aro Design Guide should not be applied to assessing proposals that occur *within* the area of the Guide *from outside* the area of the Guide, I believe that the impacts of the proposal from the east are required to be considered under other policies; in particular:
- a. 12.2.5.1, which requires the development to acknowledge and respect for the form and scale of the neighbourhood in which it is located; and
 - b. 12.2.5.4 which requires additional height to be treated in such a way that it represents an appropriate response to the characteristics of the surrounding area.
87. Refer to further discussion under 12.2.5.1 and 12.2.5.4 below.

**Policy
12.2.5.1**

Manage building height in the Central Area in order to:

- ***reinforce the high city/low city urban form;***
- ***ensure that new buildings acknowledge and respect the form and scale of the neighbourhood in which they are located; and***
- ***achieve appropriate building height and mass within identified heritage and character areas.***

88. It can be reasonably anticipated that the scale and character of existing buildings around the site will change over time as development of the area intensifies. However, with Pukeahu National War Memorial Park to the north and west, and only one property depth separating the site from the Basin Reserve to the east, there is limited scope for new buildings of similar heights around 1-23 Tasman Street. Therefore, any development in this location needs to be effectively and sympathetically incorporated into the *existing* neighbourhood context.
89. Further, although the proposed development is not within a Heritage Area that is formally recognised in the ODP or the PDP, it is within a rich heritage landscape. Therefore, it is critical that the form, scale and character of the proposed development appropriately acknowledges and respects this landscape so that heritage values are not unduly diminished.
90. Height limits are one method used in the ODP to control the way that new buildings respond to the form and scale of their surroundings. Both the Northern and Southern Apartments in the consented development exceed the current Central Area height limit (18.6m) but only the Northern Apartments exceed the +35% discretionary height limit (25.11) and the Proposed District Plan (PDP) height limit (28.5m).
91. By setting the height of the consented Southern Apartments at 5 storeys, the potential for this building to dominate or disrupt the heritage landscape, particularly from key vantage points such as from across or within the Basin Reserve, was largely circumvented.
92. At 8 storeys (approximately 29.3m) the Northern Apartments were the most dominant building in the consented development. The position of this building allowed for it to be of a greater height while still respecting the form and scale of the neighbourhood. While the height and mass of the consented Northern

Apartments did have some negative effects, these effects were considered to be acceptable.

93. The proposed increase in height of both apartment towers means that they become more dominant. This is mitigated, in part, by the placement of the buildings and massing of built forms which are broken up into varying proportions, as contended in the AEH and by Richard Knott; but only when the proposal is viewed from certain specific positions. Refer to 12.2.5.3 and 12.2.5.4 for further discussion.

Policy 12.2.5.2 ***Manage building mass to ensure that the adverse effects of new building work are able to be avoided, remedied or mitigated on site.***

94. As with building height limitations, building mass standards are one method used in the District Plan to control the way that new buildings respond to the form and scale of their surroundings, and to manage adverse impacts on adjacent heritage items and viewshafts.
95. The massing of the consented terraced houses along the Buckle and Tasman Street edges respond reasonably to the scale of the former Police Station complex and the Tasman Street Brick Wall opposite. The Northern and Southern Apartments, as consented, presented two separate forms, further broken up through setbacks and material variation, that recess within the heritage landscape, mitigating the effect that a large and uniform tower may have. With the proposed increase in height of the apartment towers, and by reverting back to an off-white cladding for the Southern Apartments, the towers again become the dominant feature in the landscape.
96. The towers interrupt viewshafts that, while they are not formally protected features, may be regarded as important established views with some significance in the overall heritage landscape, including:
- a. The view east from the Mt Victoria Tunnel and the Southern Walkway Track (within the Town Belt) to the Carillon tower and former National/Dominion Museum. In the consented development, although the Northern Apartments are visible to one side of the Carillon, the tower itself, and the relationship between it and the former National/Dominion Museum, are not obscured by either the Northern or Southern Apartments. The consented 5 storey height of the Southern Apartments helped to ensure that the building was recessive within the surrounding heritage landscape, which is considered to be a quality design outcome from a heritage perspective. In the proposed design, the Carillon tower remains visible; however, the relationship between the Carillon and former Museum, which has been identified as contributing to the significance of both buildings, is interrupted by the south tower which extends well above the established treeline on the Pukeahu ridgeline. For further discussion of this view, refer to TA O1.1 and 1.2 above.
 - b. Views east out of the Basin Reserve.¹⁰ In the consented development, the Carillon and the relationship between it and the former National/Dominion Museum generally remained visible and therefore

¹⁰ Changes to significant historic views into and out of the Basin Reserve were specifically raised as an effect to be considered by the Board of Inquiry in relation to the Basin Bridge Proposal.

interpretable, although both were sometimes partially obstructed depending on the viewpoint. In the proposed design, the Carillon tower is more often obscured. Where it is visible, the height of the apartment buildings mean that the Carillon is no longer read as the dominant feature in the landscape; and the relationship between the Carillon and former Museum is interrupted by the south tower.

- c. Views east from Ellice Street with the former National/Dominion Museum, Carillon tower and Pukeahu National War Memorial Park sitting behind the Basin Reserve. In the consented development, the Northern Apartments partially obscured the Carillon, and the Southern Apartments partially obscured the former National/Dominion Museum, but both buildings remained visible. Some mitigation was provided by the proposed neutral palate of the Southern Apartments, and a more neutral palate for the Northern Apartments may have provided further mitigation. In the proposed design, the Northern Apartments obscure the Carillon tower and partially severs the connection between the Basin and Pukeahu, while the Southern Apartments interrupt the visual connection between the Carillon tower and former Museum.
- d. Views from the intersection of Kent and Cambridge Terraces with Buckle and Ellice Streets. As consented, the 8 storey Northern Apartments completely (or almost completely) obscured the view of the Carillon from this location, severing the visual connection and diminishing its landmark value. The impact remains unchanged by the proposal to add two storeys to the Northern Apartments. However, it is acknowledged that any development at 1-23 Tasman Street is unlikely to avoid adverse effects on the visibility, and therefore the landmark status, of the Carillon from this perspective.

Policy 12.2.5.3 Manage building mass in conjunction with building height to ensure quality design outcomes.

97. This policy allows for a balancing of building height and mass to increase the quality, variety and vitality in the built form of the City, and to achieve positive heritage and urban design outcomes throughout the Central Area.
98. The consented development represented an acceptable response to the “characteristics of the existing context” – being the surrounding heritage landscape. From the west, the proposed increase in size of the Northern Apartments means that this building becomes a more prominent feature within the landscape; however, the overall impact from within Pukeahu National War Memorial Park, or from the western side generally, is not substantially different to the consented proposal.
99. From the east, the outcome is not so positive. Although the apartment towers do not take up the entirety of the site, both the Southern and, more particularly, the Northern Apartments still appeared to have a considerable mass from this direction in the consented development. The proposed increase in the height of the apartment towers, particularly of the Southern Apartments, increases and emphasises their mass.
100. I do not agree that this is ameliorated by the “modulation” or the “breaking up of visual bulk” as described in the AEH; or by the “placement of the towers and

the gap between them” as contended by Richard Knott. The proposed 9 and 10 storey apartment towers compete with the Carillon and the former National/Dominion Museum for dominance on the Pukeahu ridgeline in a way that the consented 5 and 8 storey apartment towers do not. Further, it is difficult to discern a difference between the heights of the Northern and Southern Apartments as proposed when they are viewed from the eastern side. These effects are clearly demonstrated in the townscape views included in the application (refer **Figure 1** to **Figure 4**).

Policy 12.2.5.4 *To allow building height above the specified height standards in situations where building height and bulk have been reduced elsewhere on the site to:*

- *provide an urban design outcome that is beneficial to the public environment, or*
- *reduce the impact of the proposed building on a listed heritage item.*

Any such additional height must be able to be treated in such a way that it represents an appropriate response to the characteristics of the site and the surrounding area.

Policy 12.2.6.2 *Require high quality building design within the Central Area that acknowledges, and responds to, the context of the site and the surrounding environment.*

101. In situations where building height and building mass are reduced to achieve a positive heritage outcome, this may be compensated for by allowing additional building height elsewhere on the site as long as it is appropriate to the site and surrounding area.
102. The AEH presents the view that the proposal to increase the height of the apartment towers represents an appropriate response to the characteristics of the site and surrounding area because:
 - *The proposed height is a site-specific response to the distinctive topography of the site/area: it sits on the flanks of Pukeahu/Mount Cook, responding to the particular location in the Te Aro valley that has an otherwise generally level of contour.*
 - *The three-dimensional configuration of building massing within the site responds to the surrounding topography, the Te Aro Grid, and scales of the heritage buildings.*
 - *The proposed development maintains the characteristic mixed-grain (scale, form, and materiality) of the surrounding existing context, demonstrated by the mix of small and large buildings.*
103. The consented development is composed of buildings of varying heights and masses that are finely balanced to reduce the impact that the development will have on listed heritage items in the vicinity.
104. At 5 storeys (being approximately 19.5m), the consented Southern Apartments were higher, but not significantly higher, than the specified height standard (18.6m). At this height, the tower had a low impact on the surrounding listed heritage items. As evidenced by the townscape views included in the application (refer **Figure 1** to **Figure 4**), the proposed increase in height of the Southern Apartments to 9 storeys (being approximately 33m), and the

associated increase in bulk, impacts on the landmark significance of the Carillon and severs the visible connection between the Carillon and the former National/Dominion Museum, particularly when viewed from the east across or within the Basin Reserve. This impact is further compounded by the colour of the cladding.

105. At 8 storeys, the consented Northern Apartments were substantially higher than the current specified standard (being approximately 29.3m). The visual impact of this building was reduced by the terraced houses which create a transition between the corner of Tasman and Buckle Streets; and by breaking up the tower form with vertical and horizontal stepping and a variation of materials. However, it remained highly visible and dominant from some key viewpoints. As evidenced by the townscape views included in the application, the proposed increase in height of the Northern Apartments to 10 storeys (being approximately 36.25m) also increases the building's dominance in relation to the Carillon, negatively impacting on the Carillon tower's landmark significance. This is particularly noticeable when the proposed development is viewed from Ellice Street, but also when viewed from the Basin Reserve and from the Home of Compassion Creche at the eastern end of Pukeahu National War Memorial Park.
106. Therefore, I do not agree with the AEH or Richard Knott that the additional height proposed is an appropriate response to the heritage items in the surrounding area, particularly when the development is viewed from the east and northeast.

Policy 12.2.6.3 ***Ensure that new buildings and structures do not compromise the context, setting and streetscape value of adjacent listed heritage items, through the management of building bulk and building height.***

107. This policy looks to ensure that the context and setting of heritage items adjacent to new buildings and structures is not compromised. As part of assessing the proposal against the CAUDG, the AEH evaluates the impact of the proposal on each of the surrounding heritage items. For consistency, I have done the same. Refer to discussion under CAUDG O3.1 and O3.2.

CAUDG O2.1 ***To recognise the unique qualities and sense of place of every urban setting, and respond to and enhance these with new development.***

CAUDG O2.2 ***To maintain or enhance the quality of the settings of individual heritage buildings, including those in heritage areas.***

108. Refer to comments under CAUDG G2.1 and G2.3, and O3.1 below.

CAUDG G2.1 ***Maintain consistency with defining and valued neighbourhood patterns. Contrasts should be created only if the development is significant on a district or city-wide scale and/or accommodates a unique or publicly significant function.***

109. The proposed development is not significant on a district-wide scale, nor does it accommodate a unique or publicly significant function, insofar as it is for

residential accommodation with a small hospitality space. Therefore, it is important for the proposal to maintain consistency with defining and valued neighbourhood patterns. Refer to discussion under 12.2.5.1.

CAUDG G2.3 ***Consider ways of complementing the existing built context, including: compositional relationship ... and dimensional relationship ...***

110. Visual links to the surrounding context are important in this case to ensure that the development sits comfortably within, rather than competing with, the heritage landscape in which it is located. The area in which the development is located does not have a strong consistency of plan form, frontage alignment, or overall bulk and mass that can be carried through to the development to ensure that it is complementary to the existing built context. Therefore, other methods must be used.
111. The consented development used a variation in building sizes, forms and materials to respond to the built context in a way that was generally complementary. In particular, limiting the height of the Southern Apartments to 5 storeys and implementing a recessive colour palette ensured that this building accedes to the dominance of the Carillon tower and the former National/Dominion Museum within the existing built context, and that their relationship to each other continued to be legible. Although in excess of the height limits in both the ODP and PDP, the position and design of the Northern Apartments, combined with the low-rise terraced housing on Buckle and Tasman Streets, mean that this building also sat comfortably within the existing built context.
112. By increasing the height and, accordingly, the bulk of both the apartment towers as proposed in the Application, the compositional and dimensional relationship of the development to the existing built context is changed, and will no longer be complementary.
113. With reference to G2.3, the Urban Design Assessment prepared for WCC by Andrew Burns states:

Buildings A and E [being the Northern and Southern Apartments respectively] are separated to allow eastern views towards the former Dominion Museum however a step in height from Building A down to Building E or a distinctive change to the design treatment and setback to imply a visual step of the top level of Building E could create a better contextual response relative to the Carillon and former Dominion Museum.¹¹

I support the recommendation for a step down in height between the Northern and Southern Apartments.

CAUDG O3.1 ***To complement existing patterns of alignment, and achieve a positive scale relationship with adjoining buildings and public spaces.***

114. In assessing this objective the AEH states that:

¹¹ Refer to p11 of the Urban Design Assessment.

- *The apartment towers have a relationship to the historic and existing Te Aro grid alignment (which the existing nearby heritage items are also aligned to).*
 - *The positioning of the two apartment towers across the site has also been designed in relation to both the Te Aro grid and the National War Memorial: the threshold between the two apartment towers is aligned on the historic Te Aro grid axis with the Carillon tower as the reference datum point for the axis.*
 - *The ‘rifting’ of the towers (both north and south blocks) provides a scale and relief to the tower forms, with the leading-edge proportions of the front (north) tower referencing the verticality of the Carillon tower.*
115. I accept that the separation of the apartment towers and the “rifting” that is integrated into the design of the Northern Tower, helps to break up the forms that mitigate the impact of the proposed additional height, especially from the west. However, these features of the tower design are not obvious from the east. While the threshold between the apartment towers means that the Carillon tower remains visible from some narrow vantage points from the east, the dominance of the Carillon on the ridgeline is significantly reduced, and the contextual relationship between the tower and the former National/Dominion Museum is obscured.
116. While I do not agree that the proposed increase in the height of the apartment towers “will not cause any adverse dominance ... effects” on Pukeahu National War Memorial Park (emphasis added), these effects are not so significant that they are unacceptable. I also accept that the proposed increase in the height of the towers does not notably increase any severance effects within Pukeahu National War Memorial Park. However, it is from the east, rather than from Pukeahu National War Memorial Park, that the proposal does not achieve a positive scale relationship within the wider heritage landscape.
117. For further discussion relating to the Northern and Southern Apartments, refer to 12.2.5.1-12.2.5.3.

CAUDG O3.2 ***To respect the setting of heritage items and identified heritage areas.***

118. Generally, I accept the assessment made in the AEH, insofar as it relates to direct effects on individual heritage items in the vicinity. However, the assessment is focussed on directly impacting each item and its immediate context, not on the relationship that these items have with the wider heritage landscape.
119. For example, I accept the statement that:
- The collection of heritage elements grouped on and around the ridge and slopes of Pukeahu/Mount Cook – the National War Memorial, the Dominion Museum, the former Mount Cook Police Station building and the Tasman Street wall at the eastern corner, and the former Army Headquarters Building to the west – can be considered collectively, in conjunction with the recent National War Memorial Park public setting to the north, to have a combined heritage context. The proposed development sits adjacent to, but outside of, this important group setting. The proposed scheme respects and maintains the character and significance of the*

individual and collective heritage elements and enables their continued appreciation and interpretation.

120. However, this fails to consider the landmark value of the Carillon tower, in particular, beyond the context of this cluster of buildings and/or Pukeahu National War Memorial Park.
121. I refer to my comments under 12.2.5.2 and TA O1.1 with regards to the AEH statement that:

Views of the National War Memorial and Dominion Museum are part of the wider urban context that includes dynamic and changing glimpses of the site as one moves through the city. While there are views to the National War Memorial and Dominion Museum (former), these are incidental to, and not part of, the formal designed northsouth axis. The proposed development will continue to afford glimpses towards the National War Memorial and Pukeahu from different points within and around the Basin Reserve area.

CAUDG G3.3 ***To create coherent patterns of building that contribute to the amenity of neighbouring public spaces.***

122. Refer to discussion under CAUDG G2.1, G3.1 and G3.2.

CAUDG G3.1 ***Site and align building forms to reinforce the local street grid and the local system of public open spaces, with common alignment and construction generally to the street edge.***

CAUDG G3.2 ***Align buildings with the block pattern typical of the surroundings where there are no other buildings on the block.***

123. The consented development is aligned to the “Heaphy” or Te Aro grid, referenced off the National War Memorial and the former National/Dominion Museum, rather than being aligned to Tasman Street. This is not changed by the proposal, and therefore the comments made in the Addendum to my Heritage Advisor Assessment for the (now) consented proposal stand.

CAUDG G3.3 ***Maintain the general continuity of massing and street frontage alignment at bends and street corners.***

124. The former Army Headquarters and Police Station buildings have prominent corner locations that provide definition to the frontage of the National War Memorial within Pukeahu National War Memorial Park. In the consented development, the terraced houses on the corner of Buckle and Tasman Streets are relatively consistent with the massing of these buildings, and with the alignment of Buckle Street. While this part of the development is not changed by the proposed increase in height of the apartment towers, the continuity afforded by the consented development is eroded by the increased height of the Northern Apartments.

CAUDG G3.4 ***Maintain general consistency of building height at the street edge.***

125. There is no particular consistency of building height at the street edge along Buckle Street or through Pukeahu National War Memorial Park. In the consented development, the lower height of the terraced houses on the corner of Tasman and Buckle Streets has some consistency with the lower height of the former Police Station compound and the Tasman Street Brick Wall immediately across the road, but this is overshadowed to some extent by the height of the Northern Apartments immediately behind – an effect that will only be worsened by further increasing the tower height. Along the eastern side of Tasman Street building heights are generally one to three storeys. The height of the consented towers was already inconsistent with this, and the proposed increase in height would be even more so.

CAUDG G3.5 ***Ensure new buildings do not dominate lower adjacent public spaces and neighbouring buildings by moderating their height at and close to the street edge. This will achieve a scale transition between the higher and lower buildings/spaces.***

126. The consented development does not dominate the adjacent public space of Pukeahu National War Memorial Park. The terraced houses at the Tasman/Buckle Street corner create a scale transition that would not be achieved if the north tower was built to the street edge. The topography of both the Park and the development further assist to mitigate the extent to which the Northern Apartments become the primary feature of the public space. The impact on Pukeahu National War Memorial Park is not significantly changed by the proposed increase in height, and therefore bulk, of the Northern Apartments.

CAUDG G3.7 ***Reduce the proportion of site area covered by parts of buildings that are significantly higher than existing surrounding buildings.***

127. The proportion of the site area covered by the Northern and Southern Apartments in the consented development is limited to allow for the incorporation of terraced housing, open space, and vehicle movement.
128. 1At 5 storeys, the consented Southern Apartments were higher, but not significantly higher, than the surrounding buildings, limiting its impact.
129. At 8 storeys, and well above the current Central Area Height Limit of 18.6m, the consented Northern Apartments were significantly higher than any surrounding buildings. The visual impact of this building was reduced by the terraced houses which created a transition between the corner of Tasman and Buckle Streets; and by breaking up the tower form with vertical and horizontal stepping and a variation of materials. However, it remained highly visible and dominant from some key viewpoints.
130. The Application proposes to increase the height of the Northern and Southern Apartments to 10 and 9 storeys respectively without any notable change to the building footprints.
131. As stated in the Addendum to my Heritage Advisor Assessment for the consented development, the greater the height of each apartment tower, the less difference that a reduction in the proportion of site coverage would make to the resulting effects on heritage values. In this respect, the consented

development was finely balanced; and any change to the 8 and 5 storey heights of the Northern and Southern Apartments respectively would change the conclusions of my Assessment, even if there was a corresponding reduction in footprint.

132. I do not agree with the contention made in the AEH that the separation of tower forms and the alignment of the towers on the Te Aro grid provide mitigation for the impact of the proposed taller towers.

CAUDG G3.8 ***Mitigate the visual impact of building bulk, where a building is large relative to its neighbours and to other nearby buildings.***

133. The proposed increase in height of the apartment towers necessarily increases their bulk relative to neighbouring buildings. While the visual impact of the towers is reduced by the townhouses on the corner of Tasman and Buckle Streets and by breaking up the tower forms with vertical and horizontal stepping and a variation of materials, these do not sufficiently mitigate the obscuration and severance that results from increasing the height of the towers.

Proposed District Plan

134. I did not assess the consented development against the objectives and policies of the PDP in the Addendum to my Heritage Advisor Assessment. However, the development was assessed against these objectives and policies in the Final Decision Report. I have referred to this Report in my assessment of the Application below.¹²

CCZ-P9 ***Quality design outcomes***
Require new development, and alterations and additions to existing development, at a site scale to positively contribute to the sense of place and distinctive form, quality and amenity of the City Centre Zone by:
2. *Ensuring that development, where relevant:*
(a) *Responds to the site context, particularly where it is located adjacent to: (ii) A heritage building, heritage structure or heritage area*
(b) *Responds to the pedestrian scale of narrower streets; ...*
(c) *Enhances the quality of the streetscape and the private/public interface;*

135. The design for the development at 1-23 Tasman Street has, as the AEH states, “undergone a process of exploration and iteration”. This process led to the consented development. As identified in the Decision Report for SR 500876, the height of the towers in the consented development demonstrated respect for the heritage features adjacent to, or in the vicinity of, the development, responding appropriately to the scale and attributes of the streetscape, while also “meeting the requirements of yield and providing a variety of accommodation options”. In applying to add further height to the apartment towers, the Applicant is reverting to an earlier iteration of the design (albeit with some minor differences), the scale of which does not respond positively to the surrounding context.

10. ¹² Note that I am considering only on the difference between the consented development and the proposed increase in height of the Northern and Southern Apartments (not the overall design).

136. I do not agree with the statement made in the AEH that “the proposed height of the apartment tower blocks lends greater value to the nearby lower-scale heritage assets ... reinforcing their distinctive form and scale within an urban cityscape that anticipates and warrants greater intensification”. Generally, developments of great height that are adjacent to heritage places, or are within heritage settings or landscapes, are not considered to enhance these places or landscapes. This is recognised by the objectives, policies and rules of the ODP and PDP which identify that developments of considerable height, bulk and mass impact on heritage values in a negative way, and place limits on these to limit or avoid such impacts.
137. The AEH states that the terraced housing along Buckle and Tasman Streets create a “positive scale transition” which “responds directly to the lower scale of the historic former Mount Cook Police Station building and provides an appropriate height transition from the street edge”. I do not disagree with these statements. However, the terraced housing is already part of the consented development, and does not mitigate the dominance that the apartment towers will have in the wider heritage landscape if their heights are increased as proposed.
138. I have responded to other points made in relation to this policy in the AEH under TA O1.1 and 1.2, 12.2.5.2 and 12.2.5.4 above.

CCZ-S1 **Maximum Height Location i: Height Control Area 1 – South-East, South-West Zone Edge. Limit = 28.5 m.**
1. Streetscape and visual amenity effects;
2. Dominance and privacy effects on adjoining sites;

139. Refer to discussion above.

CMU G2 **Identify and respond to the natural and cultural landscape within and surrounding the site, including but not limited to: Scheduled heritage places**

140. Refer to discussion above.

CMU G28 **Consider the scale of adjacent heritage buildings and areas in the design. Adopt street wall heights, upper level setbacks and appropriate building separation to respond to the scale of adjacent heritage buildings and contributing buildings to heritage areas.**

141. In relation to CMU G28, the AEH states:

When seen from the east, the overall Southern Apartment Tower is perceived as two tall/narrow forms because of the breaking up of the block's mass, which relates visually to the verticality and proportions of the Carillon tower.

Similarly, the tall, narrow proportions and vertical nature of the southern half bay of the Northern Apartment Tower's eastern elevation, which is stepped down from the rest of the Northern Apartment Tower volume, appears as a distinct element that complements the Carillon tower form.

The two projecting balcony stacks on the Northern Apartment Tower's eastern elevation are positioned together in the middle of the eastern elevation, providing an additional expressed sense of verticality (as a subtle reference to the Carillon tower) and helping to visually break down the perceived volume of the Northern Apartment Tower.

142. I do not agree that the Southern Apartments are perceived as “two tall/narrow forms” when viewed from the east as depicted in the townscape views provided with the Application. It is possible to recognise that there is a setback between the northern and southern ends when shadows are cast. However, this is not sufficient to ameliorate the effect of the distinct horizontal banding created by the rows of windows and solid off-white cladding which make it easy to discern that the building is one structure.
143. Nor do I agree that the proportions of the southern half bay and position of the balcony stacks on the Northern Apartments break down the perceived volume of the building or reference the Carillon tower. From a distance, the building is still distinctly read as one mass.
144. For further discussion on the half-bay 12.2.5.3 down at the south end of the Northern Apartments, refer to my commentary under TA O1.1.
145. The AEH continues:

The Basin Reserve Heritage Area has been proposed for recognition as a heritage area and included within the PDP. The description and evaluation of heritage values for the area identifies that while there are a number of inter-related historic elements within the Basin Reserve Heritage Area, there is no recognition or reference that the Basin Reserve area has a relationship (aside from the relative proximity of distance) with Pukeahu and its collective heritage elements ...

146. I acknowledge that the heritage inventory assessment for the Basin Reserve Heritage Area being considered as part of the PDP does not explicitly identify a connection between the Basin Reserve and Pukeahu National War Memorial Park. However, this does not – in and of itself - mean that each place/area is not part of the other's wider setting. With regards to the importance of the wider heritage landscape, I refer to discussion above and under Part 2 below.

CMU G31 Identify and respond to the natural and cultural landscape within and surrounding the site, including but not limited to: Scheduled heritage places

Refer to discussion above.

Part 2 – Purpose and Principles of the RMA

147. In addition, Part 2 of the Act requires the Council to recognise and provide for matters of national importance (section 6) particular consideration has been given to 6(f) the protection of historic heritage from inappropriate subdivision, use, and development. The definition of historic heritage includes “surroundings”.¹³ Whether a project is inappropriate in terms of s6(f) has to be

11. ¹³ Refer RMA (1991) Section 2

assessed against the historic heritage values of the surrounding area and its effects on those values.¹⁴

148. On this basis, the *Final Report and Decision of the Board of Inquiry into the Basin Bridge Proposal* determined that:

a. ... *we are obliged to consider the effects on historic heritage and that historic heritage includes not only built heritage but the surroundings and setting in which the built heritage exists. In our view, the explicit focus of the Transport Agency, Wellington City Council and Heritage NZ heritage assessments on built heritage, as distinct from historic heritage, unduly limited the scope of those assessments.*¹⁵

And:

b. *Our overall evaluation is not simply a matter of considering effects on listed heritage items or confining our evaluation to a consideration only of the loss or restoration of heritage fabric, although such historic heritage effects are part of the cumulative picture. We must consider the character and significance of the whole wider heritage area and the appropriateness of such a structure within it.*¹⁶

149. The contention made in the AEH that “the Board of Inquiry did not find that there was a specific or significant relationship between the Basin Reserve Historic Area and the Pukeahu/National War Memorial area” does not accord with this statement.

150. The Board of Inquiry found that there were two important issues relating to the protection of historic heritage in the context of the Basin Bridge Proposal: the inherent conflict in mitigating adverse effects, and the cumulative adverse effects of severance within the heritage setting, being the setting identified in paragraph 1328 as “the whole area from Taranaki Street to Government House”. Paragraph 1329 of the Decision continues:

The adverse effects are occasioned by the dominance of the Basin Bridge, resulting from its bulk and scale in relation to the present environment, and the future environment, which does not anticipate such a substantial elevated structure in this significant open space.

151. The AEH correctly identifies that the same conflicts and cumulative adverse effects do not exist in the proposed development – this is necessarily so as the proposal is for a different type of development on a different site. What is relevant, however, is that the proposal is within the same “wider heritage area” that was identified by the Board of Inquiry into the Basin Bridge Proposal; and, therefore, the same need to assess the adverse effects of the proposal on this “wider heritage area” exists.

152. In his peer review of the AEH, Richard Knott agrees that it is appropriate to consider the ways in which the proposed development impacts on the “wider

12. ¹⁴ *As per the Supreme Court's decision in Environmental Defence Society Inc v The New Zealand King Salmon Co Ltd (2014)*

13. ¹⁵ *Paragraph 623*

14. ¹⁶ *Paragraph 781*

heritage setting”; but disagrees that the setting of the development is the same as for the Basin Bridge Proposal, arguing that the “wider heritage setting” should be determined on a case-by-case basis. Specifically, he agrees that it is appropriate to consider Pukeahu National War Memorial Park, the former National/Dominion Museum, the Carillon and National War Memorial, the Home of Compassion Creche, the Mt Cook Police Station, and the Tasman Street Wall to the west; and the Basin Reserve to the east; but takes the position that it is not appropriate to consider the Mt Victoria residential area as part of the setting, stating:

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

153. I agree that it is necessary to consider the wider heritage setting of a proposal on a case-by-case basis. However, it remains my view that it is appropriate to consider how the proposal impacts on the landmark values of the Carillon and the visible relationship between the Carillon and the former National/Dominion Museum, are impacted by the proposal.
154. I note that Mr Knott cites paragraph 713 (b) [i] at which the Board of Inquiry asks: “Will the Basin Bridge structure disrupt historically significant views of the Basin Reserve from Mt Victoria residences?” In this case, I believe it is appropriate to ask: Will the proposed development at 1-23 Tasman Street disrupt historically significant views of the Carillon and former National/Dominion Museum from Mt Victoria?
155. Regardless of this, I note also that, in agreeing that the Basin Reserve does form part of the “wider heritage setting” of the proposed development, Mr Knott has not commented on the ways in which the proposal becomes the dominant feature of the landscape when perceived from within the Basin Reserve or from the intersection at Kent/Cambridge Terrace.
156. It is my view that the proposed development becomes a dominant feature within the heritage landscape from Mt Victoria across the Basin Reserve, from within the Basin Reserve, and from the intersection of Kent/Cambridge Terrace with Buckle/Ellice Streets, and at several key points and in several different ways, severs the visual connections with and between the Carillon tower and the former National/Dominion Museum. Therefore, the proposal may be considered as an inappropriate development due to the effect that it has on the historic heritage values of the surrounding area.

Submissions

157. I have reviewed the 18 submissions received in relation to SR 528330. Seven submissions support the Application, eight oppose the Application, two are neutral, and one supports in part and objects in part.

Submissions in Opposition

158. For submissions in opposition to the proposal, I have extracted the key points made by the submitters that are relevant to historic heritage values – being Tyrone Anderson, Stuart Gray, Alyssa Hatton, Peter McLuskie, and Nicola Bennett - and provided a response.

In Opposition to the Proposal		
	Submitter	Reviewer's Comment
(a)	Pukeahu National War Memorial Park will be dominated, overshadowed, or overcrowded by the development, and therefore it will negatively impact on the Park's heritage significance.	All of the submitters identified above oppose the development due to its impact on Pukeahu National War Memorial Park. I have some sympathy for this view, although I accept that the proposed increase in height of the Northern Apartments from 8 storeys to 10 storeys would make a minimal difference to the way that the development impacts on Pukeahu National War Memorial Park.
(b)	The proposal is out of keeping with the surrounding landscape or area (wider than Pukeahu National War Memorial Park)	Many of the submitters citing the impact on Pukeahu National War Memorial Park also object to the proposal on the grounds that it will dominate the surrounding landscape or area as a direct result of its height. As explained above, I largely agree with this position.
(c)	The proposal blocks views of the Carillon, which is an iconic building that can currently be seen from many directions	In their submissions, both Tyrone Anderson and Stuart Gray specifically object to the way in which the proposed development blocks views of the Carillon tower and thereby negatively impacts on its "iconic" status and meaning. As explained above, I agree that the additional height of the apartment towers proposed will obscure or block significant views of the Carillon, particularly from the east. These impacts are largely avoided in the consented development.
(d)	The development does not add to the character of the area	I agree with the submission made by Stuart Gray that the proposal cannot be considered to "add to" or "enhance" the values of the heritage landscape or, specifically, the heritage buildings therein, as contended in the Applicant's AEH.
(e)	The impact of the development would be reduced if the height of the towers is reduced	Several submitters recommend reducing the height of the towers as a means of avoiding the impacts about which they are concerned. It is my position that the shorter apartment towers that have been consented clearly demonstrate that this is the case.

Submissions in Support

159. For submissions in support of the proposal, I have broken down my comments by submitter, and provided a response.

In Support of the Proposal		
	Submitter	Reviewer's Comment
(a)	Heritage New Zealand Pouhere Taonga (HNZPT)	<p>HNZPT's submission, signed by Area Manager for the Central Region, Dean Raymond, acknowledges that the proposed development is located in a highly significant heritage landscape that includes a number of Category 1 Historic Places and Historic Areas, and a proposed National Historic Landmark. Never-the-less, the submission supports the proposal, stating:</p> <p><i>In alignment with the letter dated 8 October 2021, HNZPT is able to support the construction of a multi unit development comprising two apartment blocks: one at 10 storeys and one at nine storeys at 1-23 Tasman Street. The version of the proposed development which is the subject of this notified consent is of the same scale and closely similar design to the version which was addressed in the HNZPT letter of 8 October 2021.</i></p> <p>It is evident that the letter from HNZPT dated 8th October 2021, signed by Alison Dangerfield, (then the Area Manager for the Central Region but who has since retired), has left HNZPT with little alternative but to support the current application.</p> <p>The letter dated 8th October 2021 states at paragraph 4:</p> <p><i>The assessment [of effects on heritage] ... states that the development does not dominate the surroundings, both the surrounding heritage elements and the National War Memorial settings. Heritage New Zealand believes the bulk of the building has been reduced to the limit where domination is avoided, yet the bulk remains considerable. The mass of the public monuments, which desirably should stand out, only just manage to hold their own.</i></p> <p>This statement suggests that HNZPT's support for the development in October 2021 was marginal. This is corroborated by the statements at paragraphs 2 and 6 of the letter which refer to early advice given to the Applicant, and changes to the design that occurred as a result.</p> <p>At paragraph 6, the letter states:</p> <p><i>As mitigation to keep any effects of domination in check, the development uses a number of designed elements.</i></p> <p>The letter does not specify what "designed elements" are referred to here, although two of these may be inferred through paragraphs 7 and 8:</p> <p><i>[The] North Tower has a west wing which drops down</i></p>

In Support of the Proposal		
	Submitter	Reviewer's Comment
		<p><i>one floor towards Tasman Street. This reinforces that the higher part of the tower is further away.</i></p> <p><i>The building uses a realignment of the tower and a corner brick section to reinforce the pedestrian level and reference the former Police Barracks across the road.</i></p> <p>The design of the North Apartments as proposed is different to the design of October 2021 and, although these differences may be subtle, I believe they are significant enough to warrant a reassessment by HNZPT, rather than reliance on the opinion expressed in the letter.</p> <p>I accept that the alignment of the North Apartments with the Te Aro grid, and the brick-clad terraced housing on Buckle and Tasman Streets, are an appropriate response on the site. However, I do not agree that these aspects of the design mitigate the impact that the height, bulk and mass of the North and South Apartments have on the values of the heritage landscape.</p> <p>At paragraph 9, the letter states:</p> <p><i>There are benefits provided by Pukeahu Park, as well as to the park. The development proposed, with high level apartments and large windows, will provide excellent oversight of the park at all times of day and night. This will help to deter anti-social behaviour around the Home of Compassion Creche, the former Police Barracks and the National War Memorial.</i></p> <p>These benefits are provided by the consented development. Additional height is not necessary to achieve them, as oversight from the 9th and 10th floors would be minimal and ineffective.</p>
(b)	Ben Schrader for Historic Places Wellington (HPW)	<p>In their submission, HPW “welcome the attempts the developer has made to refer to the existing historic heritage within Pukeahu National War Memorial Park” by referencing the former Police station and Home of Compassion creche through the brick-clad town houses on the corner of Buckle and Tasman Streets and the orientation of the development on the Te Aro grid. These are features of the consented development which I agree are effective methods of responding to the heritage landscape in which the development is positioned.</p> <p>Although the submission is given in support of the development, it clearly states that HPW oppose “the obscuring of the Carillon and Pukeahu/Mt Cook ridge from certain eastern aspects of the Basin Reserve area”. In making this point, the submission acknowledges that some mitigation is provided by “relocation of the southern</p>

In Support of the Proposal	
Submitter	Reviewer's Comment
	<p>apartment building several metres south of its original site” which allows for a view of the Carillon from the Mt Victoria Tunnel. This (presumably) refers to the location of the Southern Apartments presented in the Resource Consent Application in October 2021 and the location of the Southern Apartments in the consented development (which remains unchanged in the proposed design). Based on these comments, it may be assumed that HPW would prefer a scheme that avoided obscuring the Carillon and the Pukeahu ridge in the manner that the consented development does.</p> <p>Further, the submission states that HPW “have some reservations about the sheer bulk of the apartment buildings in an otherwise low-rise area” but that they “accept that such bulk is now allowed within the District Plan, and higher densities are inevitable in the area”. I recognise that higher density development in this area in the future is possible; and this informed my evaluation of the consented development. The bulk of the proposed towers is non-complying under the PDP, and therefore the statement that “such bulk is now allowed” is not correct. Further, it is my view that the proposal to increase the heights of the apartment towers mean that the bulk of these buildings would no longer be appropriate within the heritage landscape.</p> <p>I support the suggestion made in HPW’s submission that the developer provide some interpretation within the development “that relates the heritage of the area and the developer’s attempts to acknowledge it in the same scheme”.</p>

160. As stated in the AEE, it is not the policy of Manatū Taonga - Ministry for Culture and Heritage (MCH) to provide letters endorsing a proposed project. However, MCH did provide a letter (dated 16 December 2021) in support of the Application (presumably the one made in October 2021) which stated that, if HNZPT had no objection, then they also had no objection. Insofar as MCH have deferred to HNZPT, I refer to my comments responding to HNZPT’s submission above.

Neutral Submissions

161. While it does not relate directly to heritage impacts, the neutral submission made by Waka Kotahi NZ Transport Agency raises matters that it is prudent to consider in relation to the effects that the proposal will have on the heritage landscape.
162. At paragraphs 5.6 and 5.7, the submission states:

It is noted the applicant anticipates the development granted consent under SR 500876 to form part of the existing environment and therefore to be of relevance for any assessment of effects on the receiving environment.

It is important to note that no specific geotechnical assessment was submitted as part of the application specifically considering geotechnical and structural effects of the development on the adjacent Arras Tunnel approach retaining walls or any potential wider effects on the state highway network.

163. At paragraphs 6(i) and (iv) the submission continues:

Waka Kotahi is unable to support any further progress of the proposal without a better understanding the potential geotechnical effects on the adjacent state highway network.

Waka Kotahi requires a comprehensive assessment to be prepared by a suitably qualified geotechnical professional addressing:

- Ground water changes;*
- Settlement;*
- Ground lateral deformations (lateral movement);*
- Stability of site;*
- Any additional load on the Arras Tunnel walls;*
- If there is a need for additional monitoring (groundwater/movement); and*
- Any other adverse effects the development could pose to the ongoing operation of the State Highway network.*

164. It is understood that, historically, there have been issues relating to groundwater and stability on sites in this area which were apparent during construction of the Carillon and the Hall of Memories. A new waterproofing system for the Hall of Memories was fitted in 2004.¹⁷

Conclusion

165. The site of the proposed development at 1-23 Tasman Street does not contain any individually listed heritage buildings, nor is it in a heritage area. However, the heritage landscape in which the proposal is located is of the highest level of national significance. Any development in this position will impact on heritage values.
166. The consented development (SR 500876) is an amended version of a design that was submitted for resource consent in October 2021. Like the current proposal, this design included a 9-storey south tower (Southern Apartments) and a 10-storey north tower (Northern Apartments); and it was not supported on heritage grounds. The landmark status of the former National/Dominion Museum and National War Memorial and Carillon – particularly the Carillon tower – and the relationship between them were obscured and diminished by the proposed development when viewed from the east. The skyline along Pukeahu ridge would have been permanently altered by the proposal. The towers interrupted viewshafts that, while they are not formally protected features, may be regarded as important established views with some significance in the overall heritage landscape.

15. ¹⁷ *Conservation Plan for the National War Memorial (R&D Architects, Michael Kelly, and SPK Landscape Architects, 2018) p34*

167. Further, the Carillon tower would have been partially – and in some cases entirely - obscured from view from key vantage points such as Ellice Street, the intersection of Buckle and Ellice Streets with Kent and Cambridge Terraces, and within the Basin Reserve. From these perspectives the proposal did not respect the symbolic status of the Carillon and National War Memorial.
168. Through lengthy consultation between the Applicant and Council Officers/Advisors, the proposal was altered to address some of these impacts, and achieve a proposal that was acceptable on heritage grounds. The amended proposal, which achieved Resource Consent in December 2022, has an 8 storey tower at the northern end of the site (Northern Apartments) and a 5 storey tower at the southern end of the site (Southern Apartments). This allows the relationship between the Carillon and the former National/Dominion Museum to be read within the heritage landscape from long established views, including from the Mt Victoria Tunnel across the Basin Reserve, and from within the Basin Reserve itself.
169. The view of the Carillon and former Museum from the intersection of Buckle and Ellice Streets with Kent and Cambridge Terraces is substantially obscured by the Northern Apartments as consented; however, it is acknowledged that a development to 18m in height on this site would also be likely to obscure this view.
170. While it was considered to be acceptable on heritage grounds, the consented development was very finely balanced. As explicitly stated in the Addendum to my Heritage Advisor Assessment for SR 500876 (dated 9th September 2022), any changes to the design, particularly changes in the height, bulk and mass of the Northern and Southern Apartments, would be likely to increase negative heritage effects.
171. By re-elevating the Southern Apartments to 9 storeys and the Northern Apartments to 10 storeys, the proposed development would effectively undo what was successfully achieved in the consented design. It would once again diminish the landmark status of the former National/Dominion Museum and the National War Memorial and Carillon – particularly the Carillon tower – and obscure the relationship between them when viewed from the east. The skyline along Pukeahu ridge would be permanently altered by the proposal. The towers would interrupt viewshafts that, while they are not formally protected features, may be regarded as important established views with some significance in the overall heritage landscape.
172. Based on the above assessment the proposal **is not** supported on heritage grounds.

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