

Before an Independent Commissioner of Wellington City Council

Under the Resource Management Act 1991

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

**EVIDENCE OF ADAM WILD ON BEHALF OF THE APPLICANT IN SUPPORT OF
APPLICATION FOR RESOURCE CONSENT**

HISTORIC HERITAGE

15 May 2023

1. INTRODUCTION

1.1 My full name is Adam Wild.

1.2 I am a director at Archifact – Architecture & Conservation Limited (**Archifact**), an Auckland-based architectural practice accredited in accordance with the rules of the New Zealand Institute of Architects (**NZIA**) offering recognised specialist skills in architecture, building conservation, and the management of buildings, objects, places, and areas of historic heritage value.

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

2. QUALIFICATIONS AND EXPERIENCE

2.1 I am a registered architect in accordance with the rules of the Registered Architects Board and Fellow of the NZIA.

2.2 I have a Master of Arts degree in Conservation Studies (Historic Buildings and Landscapes) from the University for York (2004) and a Bachelor of Architecture degree from the University of Auckland (1991).

2.3 I have been a practising registered architect for nearly 30 years. I am the founding director of Archifact and have focussed my professional practice in the specialist field of architectural conservation since 2003.

2.4 I am:

- (a) a full member of the International Council on Monuments and Sites (**ICOMOS**) New Zealand, a member of ICOMOS Pasifika, and an expert member of the International Polar Heritage Committee (a scientific committee of ICOMOS);
- (b) a full member of the New Zealand Conservators of Cultural Materials Association;

- (c) a member of, and peer reviewer for, the International Association for Preservation Technology International;
- (d) a peer reviewer for the Endangered Wooden Architecture Programme at Oxford Brookes University;
- (e) a member of the Urban Design Forum;
- (f) a member of the International Cities, Town Centres and Communities Society; and,
- (g) a member of the Resource Management Law Association (**RMLA**) and a contributor to the RMLA's Resource Management Journal. In 2017 I was awarded the RMLA's Outstanding Person Award for my "*Significant contribution to conservation architecture in New Zealand and internationally*".

2.5 I am currently, or have been, conservation architect for a number of nationally and internationally significant building conservation projects. Included amongst these projects are:

- (a) the Treaty House at Waitangi (1834);
- (b) Old Government House (1840 and 1856) and precinct, Auckland;
- (c) The Wellington Town Hall (1904);
- (d) The Heroic Era Huts of Scott and Shackleton in the Antarctic, and,
- (e) The former Courthouse in Apia, Samoa, which I successfully nominated as the first site in the South Pacific to be recognised on the World Monuments at Risk.

2.6 I have received a number of industry awards for my work in historic heritage practice including from the NZIA, the New Zealand Property Council, and the Registered Master Builders Association.

2.7 Since 2009 I have been associated with the Department of Architecture at the Unitec Institute of Technology ("**Unitec**") in Auckland as an external examiner for their Master of Architecture candidates, as guest reviewer, and as lecturer in a range of architectural conservation subjects including contributions to the "History

of New Zealand Architecture" series and on matters of conservation law and practice.

- 2.8** In the professional roles I have had and perform today as outlined above, I have acquired a sound working knowledge in the specialist discipline of building conservation, issues relating to the recognition and assessment of historic heritage values, and methodologies for conserving these in accordance with national legislation and national and international conservation charters and relevant professional codes of practice.

3. CODE OF CONDUCT

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

4. SCOPE OF EVIDENCE

- 4.1** I was engaged by Parliamentary Service in relation to the application in April 2021, and have provided expert conservation architecture services associated with the proposed Parliamentary Precinct Future Accommodation Strategy since that time.
- 4.2** I prepared one of the Assessment of Environmental Effects on Heritage (**AEE-H**) filed in support of the Application, dated September 2022. In preparing this statement of evidence, I have reviewed the Council's section 42A report and the submissions received relevant to my area of expertise.

4.3 My evidence will cover the following matters:

- (a) A background to the recognised historic heritage values of the Parliamentary Precinct;
- (b) The statutory protection afforded to the recognised historic heritage values of the Parliamentary Precinct in the RMA through provisions of the Wellington City Council's district plan, and through provisions of the Heritage New Zealand Pouhere Taonga Act;
- (c) Consideration of effects on those historic heritage values arising from the proposal;
- (d) Comments on submissions received;
- (e) Comments on the Council's Report; and
- (f) Conclusions.

4.4 The section 42A report concludes that, based on the expert advice, the proposal will not result in unacceptable adverse effects on the historic heritage values of the Parliamentary Precinct overall (see paragraph 51 of the section 42A report). I agree with that conclusion.

5. SUMMARY OF EVIDENCE

5.1 The project brief developed by Parliamentary Service targets three essential elements:

- (a) The establishment of a new building on Museum Street to accommodate all members of Parliament not otherwise accommodated within the Executive Wing and Parliament House, and provide direct and secure access for those accommodated in that building to Parliament House;

- (b) Provision of a new detached secure single point of receipt and dispatch of deliveries and materials into and off the Parliamentary Precinct, as a key part of an enhanced security strategy and associated site-wide buildings' services infrastructure; and
- (c) Enhancement of the Parliamentary Precinct landscape in accordance with existing protocols that maintain a sense of the openness and public permeability of the Parliamentary Grounds as a key historic heritage attribute of the precinct.

5.2 The Parliamentary Precinct is rich in historic heritage, and contains a number of listed buildings, which I discuss below.

5.3 Heritage New Zealand Pouhere Taonga (**HNZPT**) recognise that “the purpose of good conservation practice is to balance two complementary principles:

- (a) the private and public enjoyment of an historically significant place;
- (b) the continuing practical use of the place as a property asset”.¹

5.4 HNZPT Information Sheet 12 expresses a desire for “compatibility” of new buildings within an existing historic heritage context, in this case the Parliamentary Precinct, through reference to the architectural language of both the Beehive and Parliament House without imitating, replicating, or mimicking their respective historical styles or details.

5.5 Similarly, appropriate development is recognised by HNZPT in the guidance they offer where “*the proposed works aim to protect and enhance the heritage significance of the Precinct while increasing the viability of the asset overall*”.²

5.6 Appropriate development associated with historic heritage, and in this case the exceptional values of the Parliamentary Precinct, is addressed in the RMA through

1 HNZPT Guideline 10 *For Developing Heritage Buildings*, 2000, p2.
2 HNZPT Guideline 10 *For Developing Heritage Buildings*, 2000, p2.

the Part 2 section 6(f) “*protection*” of historic heritage from inappropriate subdivision, use, and development.

5.7 The WCC has, in the Operative District Plan (**ODP**), set out the purpose of meeting Council’s obligation under the RMA to recognise historic heritage, and more particularly “*protect*” recognised historic heritage from “*inappropriate subdivision, use, and development*”, as required by the RMA at section 6(f).³ The protection test focusses on the appropriateness of subdivision, use, and development and implies an openness to change and not a veto to it.

5.8 While I accept that the various heritage assessments and the conservation plans refer to the west elevation and western sub-precinct as a “*rear*” aspect to Parliament House, the proposal looks to reprioritize the west elevation of Parliament House and the sub-precinct as a new (but not primary) frontage to the way the Parliamentary Precinct can be approached, interpreted, and used. The reference to “*rear*” becomes a redundant term when the compositional values of the placement of the MUS are considered within the Parliamentary Precinct as a whole.

5.9 The **AEE-H** I prepared for the resource consent application recognised that while there are some adverse effects arising from the proposed works on the historic heritage fabric of Parliament House and the historic Museum Street Oak tree, there are positive effects associated with the project overall. On balance, the proposed adaptive reuse of Parliament House and development of the new Museum Street and Ballantrae Place buildings, and the enhancement of the associated landscaping of the western precinct are appropriate and supportable.

6. BACKGROUND TO THE RECOGNISED HISTORIC HERITAGE VALUES OF THE PARLIAMENTARY PRECINCT

6.1 The historic heritage values across the Parliamentary Precinct are recognised in a range of documents. In the AEE-H, preference has been given to the description of historic heritage values recognised in the various WCC listing reports. This is

³ RMA Part 2 Section 6(f).

because the ODP gives effect to the Council's obligations under the RMA. However, for completeness, regard has also been given to the New Zealand Heritage List entry information provided by HNZPT in accordance with the parallel legislative framework under which they operate (noting that HNZPT are not, with the exception of the modification of archaeological sites, a consenting authority). The particular values of individual assets within the Parliamentary Precinct are detailed at Section 6.3 of my AEE-H.⁴

6.2 *Chapter 21 Appendix – Heritage List: Areas, Buildings, Objects, Trees and Maori Sites* in the WCC ODP identifies the following individually listed assets relevant to the application. Each of the following assets have their own detailed assessment of historic heritage values which I have accepted and do not contest, and which have informed the AEE-H:

- (a) The Executive Wing of Parliament ('the Beehive') (Map 18, reference 36);
- (b) Parliament House (Map 18, reference 214);
- (c) Parliamentary Library (Map 18, reference 215);
- (d) Seddon Statue (Map 18, reference 36);
- (e) Balance Statue (Map 18, reference 37);
- (f) Wellington Cenotaph (Map 17, reference 31); and,
- (g) the WCC Parliamentary Precinct Heritage Area included in the ODP.

6.3 Also relevant in the ODP are the following:

- (a) Central Area Urban Design Guide, particularly Appendix 3, Location-specific Guidelines Number 1 – Parliamentary Precinct Heritage Area; and
- (b) Central Area Appendix 11, *Central Area Viewshafts Vs1, 2, 3, and 4a*.

6.4 The Parliamentary Precinct, comprising various buildings and the site, appears in the New Zealand Heritage List/Rārangī Kōrero administered by HNZPT. The New

⁴ Archifact, *Parliamentary Precinct Assessment of Effects on Heritage*, September 2022, Section 6.3, pp13-17.

Zealand Heritage List/Rārangī Kōrero includes the following individually HNZPT heritage listings within the subject area:⁵

- (a) Executive Wing ('the Beehive') (Category 1, list number 9629);
- (b) Parliament House (Category 1, list number 223);
- (c) Parliamentary Library (Category 1, list number 217);
- (d) Seddon Statue (Category 1, list number 230);
- (e) Ballance Statue (Category 1, list number 211); and
- (f) the Government Centre Historic Area (list number 7035), including (not otherwise already referenced above):⁶
 - (i) the Cenotaph;
 - (ii) Court of Appeal Building (Former);
 - (iii) Departmental Building;
 - (iv) Dominion Farmers Institute Building (Former);
 - (v) Missions to Seamen Building (Former);
 - (vi) New Public Trust Office;
 - (vii) Old High Court;
 - (viii) Public Trust Office Building (Former);
 - (ix) State Insurance Office Building (Former);
 - (x) Turnbull House;
 - (xi) Wellesley Club (Former).

6.5 The site of the former Government House stables is recorded as an archaeological site on the New Zealand Archaeological Association site recording scheme (R27/422).

6.6 The Museum Street Oak was placed on the New Zealand Notable Tree Register in 1982 (WTR/0051).

6.7 The AEE-H relies, in part, on a suite of documents prepared under the umbrella of a *Contextual Overview of the Parliamentary Precinct* (Boffa Miskell Ltd,

5 For consistency in this assessment the subject area is as defined in the *WCC Parliamentary Precinct Heritage Area*.

6 This historic area is not the same as the *WCC Parliamentary Precinct Heritage Area* defined in the ODP and embraces a significantly larger area.

30 November 2018), which include four appended conservation plans commissioned by Parliamentary Services to guide the on-going conservation and management of significant contributing elements that comprise the Parliamentary Precinct, these being:

- (a) The Executive Wing (the Beehive);
- (b) Parliament House;
- (c) The Parliamentary Library; and,
- (d) Parliament Grounds.

6.8 The Parliamentary Precinct Contextual Overview report provides a *“comprehensive history of the development of Parliament’s buildings, spaces, elements and setting, identifying their associated heritage values and significance and suggest a range of relevant policies and actions to inform their effective ongoing conservation.”*⁷ The overview aims to *“provide a complementary context”*⁸ for the significant contributing elements that comprise the PP as listed above.

6.9 Also referenced in the AEE-H was the Drakeford Williams Limited Landscape Management Plan Parliament Grounds – 10 year Landscape Management Plan 2011-2021, 29 November 2011. *Objective 6.2.5* of that Plan seeks to *“ensure that all development and maintenance work in the Eastern and Western Precincts is undertaken in a manner appropriate for the function and commensurate with the quality of the buildings and the high-profile status of the site.”* There is an expectation and a recognition of the *“potential for future built development”* reflected in the *Landscape Management Plan*, that anticipates further built development and recognises the Western and Ballantrae Precincts to the west of Parliament House as the appropriate location for any development (see *Objective 13.4.3*). The *Landscape Management Plan – Parliamentary Grounds 2011-2021 (29 October 2011)* recognises in its *Objectives* that the grounds have *“the potential to unify the varying architectural styles of Parliament Buildings”*.⁹ The *Landscape Management Plan 2011 (p21)* notes that the western precinct should *“not be seen as the ‘backdoor’ entrance to the Parliament Buildings”*.

7 Boffa Miskell Ltd, *Parliamentary Precinct Contextual Overview*, 30 November 2018, p1.

8 Ibid.

9 Paragraph 2.3.3.

7. STATUTORY PROTECTION

- 7.1 The purpose of the RMA is to promote the sustainable management of natural and physical resources. The WCC has, in the ODP, set out the purpose of meeting Council's obligation under the RMA to recognise historic heritage, and more particularly "*protect*" recognised historic heritage from "*inappropriate subdivision, use, and development*", as required by the RMA at section 6(f).¹⁰ The protection test focusses on the appropriateness of subdivision, use, and development and implies an openness to change and not a veto to it.
- 7.2 The RMA test for the 'protection' afforded to historic heritage is centred around considerations of whether the work proposed is 'inappropriate' in accordance with the protection afforded historic heritage at section 6(f). The test for change in a heritage context must be measured against the RMA's anticipation of change where it is "*appropriate*".
- 7.3 In addition to the RMA, the Heritage New Zealand Pouhere Taonga Act (NZHPTA) (2014) operates as a parallel legislative regime. Its sole purpose (Part 1 section 3) is to "*promote the identification, protection, preservation, and conservation of historical and cultural heritage of New Zealand*".
- 7.4 In the AEE-H, the proposal is tested against the WCC ODP objectives, policies, and guidelines concerned with historic heritage and the "protection"¹¹ they afford historic heritage. ODP Rules at Chapter 21 (e.g. 21A.2.1, 21A2.2, 21B2.2, 21B2.3, 21C2.1 as set out in greater detail at Section 6.4 of the AEE-H) consider the appropriateness of the proposal aligned with the various activities. However, for completeness, that assessment also considers the List entry information recorded by HNZPT in accordance with the parallel legislative framework under which they operate (noting that HNZPT are not, with the exception of the modification of archaeological sites, a consenting authority).

¹⁰ RMA Part 2 Section 6(f).

¹¹ "protection" here is in accordance with s6(f) of the RMA and the test it establishes in considering "*inappropriate subdivision, use, and development*" in the historic heritage context.

- 7.5** I have considered the main heritage-related District Plan rules that are applicable to the proposal, and am mindful of the reference and guidance at 21B *HERITAGE RULES: AREAS* of the ODP¹² where it states:

“Any listed building, object or tree within a heritage area will be assessed under the requirements of Rule 21A (Buildings and Objects) or 21C (Trees) and the rules in this chapter (21B Heritage Areas) will not apply to them notwithstanding their location within a Heritage Area. For the avoidance of doubt, any assessment of an application for such a building, object or tree will take into consideration the Heritage Area and its values.”

- 7.6** For the most part when considering effects on historic heritage, the activity status is Restricted Discretionary, however on a bundled basis the activity status of this application is Unrestricted Discretionary.¹³ Accordingly, while the assessment of effects I have undertaken uses the assessment criteria contained under the relevant heritage rules, a wider unrestricted assessment of the heritage effects of the proposal is appropriate, and is reflected in the conclusion of my assessment.

8. CONSIDERATION OF EFFECTS ON HISTORIC HERITAGE VALUES ARISING FROM THE PROPOSAL

- 8.1** Wellington City Council has limited its discretion under rule 21A.2.1 to “historic heritage” and “height, coverage, bulk and massing of buildings (to the extent that these affect historic heritage)” and under rule 21A.2.2 to “effects on historic heritage” and “height, coverage, design, external appearance and siting and the bulk and massing of buildings (to the extent that these affect historic heritage)”.

- 8.2** While my AEE-H included with the application provides a more detailed breakdown of the applicable heritage rules (and reference can also be made to section 3.2 of Mr Coop’s Assessment of Environmental Effects) I provide below an assessment of each of the key components of the proposal against these criteria.

¹² WCC Operative District Plan, Chapter 21, p7 of 60.

¹³ the proposed relocation of the listed Oak tree represents a Discretionary (Unrestricted) activity (*the destruction, removal, partial removal, or trimming of any listed tree, that does not meet Permitted Activity conditions*).

The Museum Street Building (MUS)

- 8.3** The scale, form, mass, height, and proportions of the proposed MUS Building draw directly from those qualities evident in the adjacent historic heritage buildings of the Beehive and Parliament House. While materiality (including that of the structural system) draws appropriately from its own time, lending to an appropriate distinctiveness in the design, the proposed building does not mimic those existing authentic original historic heritage details found elsewhere on the Parliamentary Precinct.
- 8.4** The proposed design aligns with the desire for “compatibility” espoused in HNZPT Information Sheet 12 through its reference to the architectural language of both the Beehive and Parliament House without imitating, replicating, or mimicking their respective historical styles or details.
- 8.5** The MUS is a building designed in the round, acknowledging through an associated open landform treatment, that wider context. The compositional placement between both Parliament House to the east and the Bowen State Building to the west places the MUS in balance with these existing built elements, while the separation from Parliament House maintains clarity and legibility to the west elevation of Parliament House and its interpretation. Carefully located and proportionally referenced, the proposed MUS Building is an appropriate addition within the historic heritage area.
- 8.6** The long axis of the proposed building reflects directly the overall plan width (north / south) of the adjacent Parliament House. While the proposed height is taller than that of Parliament House, the proposed elevation provides a reference to the “datum” of Parliament House through articulation in the cladding detail of the elevations in the MUS by way of a horizontal line at that level. This datum reference sits within the overall narrative of the elevational treatment of the MUS.
- 8.7** The new building height standards of the District Plan provide for a 27 metre building height “west of Museum St”. Appropriately located and proportionally

referenced, the proposed MUS Building is an appropriate addition within the historic heritage area.

8.8 Two factors arising from the construction of the proposed MUS Building have potential to directly and adversely affect the values for which Parliament House was listed, these being:

- (a) the effects arising from the proposed bridge link connection; and
- (b) the proximity of the proposed MUS Building to the western elevation of Parliament House.

8.9 The proposed bridge connection directly affects one of the principal windows on the west elevation of Parliament House, and it will affect the view of the west elevation to a degree, but those effects should be measured against the benefit derived from the greater programme enhancing the Parliamentary purpose and use of the heritage precinct. It is my understanding that the proposed bridge is a significant component enhancing the purpose and function of the MUS Building and of the precinct as a whole, due to the importance of having efficient access for Ministers to and from Parliament House.

8.10 The effects of the bridge connection are ultimately reversible. The location of the proposed bridge connection from the MUS to Parliament House has been carefully considered and alternatives have been tested, including I understand, a tunnel. While acknowledging that there will be adverse effects arising from the alterations to Parliament House required to accommodate the bridge connection, the location proposed capitalises on the formal architectural language of Parliament House affording an appropriate opportunity within its architectural language and detailing. I understand that there is a long tradition of bridge links within the Parliamentary Precinct since its early days, including the three existing bridges currently on the site.

8.11 I am aware that the Council urban designer has expressed concerns that the shading of the west façade of Parliament House by the MUS Building (mainly in

summer) will decrease the extent to which Parliament House will be visually appreciated and thus detract from its heritage values. I do not consider this transient effect adversely affects the heritage values of Parliament House or its primacy within the Parliamentary Precinct. Rather, I believe the enhancement of the Museum Street axis, framed in the first instance by Parliament House, is reinforced by the MUS Building. Equally, it is my understanding that because of the north-south axis of the facade the sun will still be able to create effects of light and shade which will help articulate the richness of the façade.

- 8.12** The west facade of Parliament House will be viewed and appreciated by all who exit the elevators in the MUS Building because of the extensive glazing. These elevated and close up views have never been available before. This visual relationship also helps to reinforce the functional connection of the two buildings. Collectively the relationship between the two buildings emphasises the values of Parliament House and enhances the perception of what has traditionally been considered a “rear” elevation to a higher value.

The Ballantrae Building (BAL)

- 8.13** The Drakeford Williams Limited *Landscape Management Plan, 2011* (p22) acknowledges that proposed site for the BAL is “**not** [emphasis added] *considered an important element of the overall ‘parliamentary landscape’.*” The Appendix 4 *Parliament Grounds Conservation Plan* (p64) similarly describes the Ballantrae Precinct as having a “*low*” degree of significance and contains “*little heritage fabric and has a low sensitivity to change*”.
- 8.14** As an area of recognised lesser importance in the overall parliamentary landscape, effects are associated with the more detached relationship between the BAL and the existing heritage buildings (most notably the Generally Assembly Library and Parliament House). That being said, the detached nature of the BAL from the high-status heritage buildings within the Parliamentary Precinct is a positive attribute.

- 8.15** The proposed BAL building has been designed as a “*recessive and discrete*”¹⁴ building form; its scale and materiality responding to those qualities. The compositional location of the BAL building addresses both the Parliamentary buildings, the proposed MUS building, and the integration of the active spaces between them and to the east and north of the Bowen State Building.
- 8.16** The proposed BAL building frames the northern end of the western Parliamentary precinct (including the MUS and general relationship with the adjoining Bowen campus). Its relationship with the generally orthogonal parliamentary grid and position relative to the northern end of the MUS enhances the historically weaker relationship of the western precinct.

Landscaping and the heritage Oak tree

- 8.17** Policy 6.1.1.16 of the Appendix 4 Parliamentary Grounds conservation plan states that “all ornamental and hard landscape fabric and significant landscape elements identified in this plan as having heritage value are to be retained in situ, and maintained and repaired, where necessary”. Policy 6.1.2.10 qualifies that Policy by targeting “preservation, repair, maintenance, and minor adaptation” to material identified as having “exceptional” heritage value.
- 8.18** The ‘*degree of significance*’ for “*gates*” and “*light standards*” is described at section 4.3 of the *Parliamentary Grounds* conservation plan which attributes “*exceptional*” significance to these elements, however it does not appear to fix them to a particular location, but to align with the “*original design intentions and Edwardian Baroque vision for Parliament House and its wider setting*”.
- 8.19** The proposed relocation of a number of landscape elements aligns with the Landscape Management Plan 2011 (p10) Objective 6.2.5 which seeks to “*ensure that all development and maintenance work in the Eastern and Western Precincts is undertaken in a manner appropriate for the function and commensurate with the quality of the buildings and the high-profile status of the site*”. The proposed

14 Studio Pacific Architecture *Design Statement for the Future Accommodation Strategy, Issue F, FINAL Revision 2* 14 February 2022, Section 5.3.1.

relocation of existing landscape elements also aligns with Policy 6.3.1 of the Landscape Management Plan 2011 (p10).

- 8.20** Relocation of a number of existing historic gates and lamp standards is proposed as a means of enhancing the continuity of these elements consistently across the Parliamentary Precinct, to provide legible definition to the Precinct on Bowen Street and on the western boundary and its relationship with the adjacent Bowen Campus.
- 8.21** Relocation of the George V gates, currently set deep within the Bowen Street entry, will see them closer to Bowen Street, forming a part of the overall security programme and bringing them closer to the public realm. Relocation of lamp standards will be associated with the construction of new walls matching those walls found elsewhere on the Parliamentary Precinct (notably the Molesworth and Bowen Street boundaries).
- 8.22** The location and form of the proposed MUS building has been determined by a range of spatial and functional factors which requires placement over the area occupied by the heritage Oak tree. Without relocation of the Oak tree the feasibility of the proposed MUS building would be improbable, if not impossible, in its proposed location.
- 8.23** The *Parliament Grounds* conservation plan (p71) recognises the values of the Museum Street Oak as being “*exceptional*” and that the Oak tree has a “*primary role in understanding the distinct heritage significance of the place*”. The conservation plan (p64) acknowledges that the “*western precinct has been subject to considerable change*” and recognises that “*the area around the Museum Street oak requires special consideration.*” The proposed relocation site for the heritage Oak tree is immediately west of its current location. Compositionally, this site frames both the Ballantrae Place entrance to the MUS building and the new West Courtyard space.
- 8.24** The assessment of the heritage effects of the proposed relocation of the tree is not restricted. Other factors that are considered to support relocation include the

existing poor setting of the tree amidst an existing expanse of hard surfacing and car parking, and limited visibility of the tree. Both factors compromise its heritage value. Relocation on the other hand will enable this part of the precinct to be better utilised for Parliamentary purposes which will benefit the heritage precinct as a whole.

- 8.25** Views of the heritage Oak tree in its proposed relocated position within the Parliamentary Precinct demonstrate how the heritage Oak tree will feature at a nodal or fulcrum point in the transition across the Precinct, enhancing its heritage values and interpretation. While relocation of the heritage Oak tree will move it from its original position, the new location will enhance the role of the tree within the emerging precinct and its proposed relocation further west to sit by the west entrance of an expanded Parliament grounds gives it prominence.

9. COMMENTS ON SUBMISSIONS RECEIVED

- 9.1** This section of my evidence considers a number of themes raised by the five submissions received.

Sandra-Lee Monk

- 9.2** Ms Monk's submission refers to the 'roundabout oak' (in the centre of roundabout at end of Museum Street), rather than the Heritage Oak. The roundabout Oak is proposed to be removed. Parliamentary Service have met with Ms Monk and talked through the reasons for this. I understand that from that discussion Ms Monk was understanding that attempts to relocate the roundabout Oak have not proved to be viable and relocation does not align with the Parliament landscape strategy which favours natives flora. I understand that Ms Monk has subsequently confirmed she will not be taking her submission any further.

Heritage New Zealand Pouhere Taonga

- 9.3** The HNZPT submission is "*neutral*" overall.

- 9.4** The submission states that positive aspects of the proposal recognise the improved “utility and performance of the entire site”. The MUS “underscores the importance of the government and reinforces the sense that the precinct overall is the symbolic heart of New Zealand’s democracy.” I agree.
- 9.5** The submission states that the adverse effects are considered to be the height of the MUS, which is considered “*too tall and positioned too closely to Parliament House*” and as such “*obscures views of [Parliament House’s] decorative western face*”. I have addressed this concern at 8.3 – 8.12 (above) and believe that the compositional placement of the MUS within the western sub-precinct relative to Parliament House and the Bowen State Building and its height relative to Parliament House and setback from its western elevation are appropriate. Notwithstanding its concerns, overall HNZPT maintains a “*neutral*” position and does not “*fully oppose the concept of the MUS*”.
- 9.6** Equally, concerns over the proposed bridge link between MUS and Parliament House are raised in the submission, which seeks a design that is “*consistent with the dignity and purpose of Parliament*”. HNZPT’s position does not suggest the proposed design does not meet that requirement and indicates that the mitigation measures offered through proposed conditions of consent would be acceptable. Those proposed conditions include the recording of the affected heritage buildings in accordance with the Archaeological Guidelines Series No. 1 *Guidelines for the Investigation and Recording of Buildings and Standing Structures, November 2018*, Level 1 standard as described below.
- 9.7** My understanding is that the recording promoted through the proposed condition of consent relates to just those areas of Parliament House impacted by proposed physical works (such as the window that is affected by the construction of the bridge), and would not extend to the entire building. The proposed Council condition (61) calls for a photographic record “*showing the existing external fabric on the west elevation (window and surrounding stonework) of Parliament House*”, so this description could define the scope and extent of the Level 1 recording.

9.8 I understand that Parliamentary Service have extensive archival documentation for the building already which may also support this condition. Refinement of the scope and extent of the Level 1 recording pertaining to the specifics of the impact on the western elevation of Parliament House arising from the proposed link bridge should be agreed as strict adherence to the Level 1 descriptor (below) would be unnecessarily onerous.

Level 1

This level is applicable as a minimum for recording for a building or structure of high archaeological value. The recording shall include:

- Measured drawings of all interior and exterior elevations.
- Recording of the internal timber frame of the building or structure (as necessary).
- Measured drawings of overall building/structure, including where relevant, all floor plans, ceiling plans and roof plans
- Subfloor plans, including floor joists, bearers, wall footings or piles.
- Plans and sections (as necessary) to record ceiling joists and roof structures.
- Cross sections to show interaction of building elements and spaces (as necessary).
- Comprehensive written description of the structural elements.
- Comprehensive written description of the exterior.
- Comprehensive written description of each room.
- Comprehensive written description of the building's /structure's development over time (potentially including a full stratigraphic matrix).
- Comprehensive photography.
- Extensive sampling of historic fabric.

9.9 HNZPT recognise that “the purpose of good conservation practice is to balance two complementary principles:

- (a) the private and public enjoyment of an historically significant place;
- (b) the continuing practical use of the place as a property asset”.¹⁵

9.10 I understand HNZPT’s neutral position overall. While there are some adverse effects, there are balancing enhancements to the facility of Parliament which are both appropriate and supportable. I consider the height of the proposed MUS Building is appropriate and its setback from the western elevation of Parliament House and its compositional placement within the Parliamentary Precinct sensitively responds to those historic heritage values.

15 HNZPT Guideline 10 For Developing Heritage Buildings, 2000, p2.

The Trustees of the Eldin Family Trust

- 9.11** I believe the essence of this submission aligns more with responses from the Urban Design specialists and is not a heritage matter.

Ben Blinkhorne

- 9.12** I believe the essence of this submission aligns more with responses from the Architectural, Landscape, Planning, and Urban Design specialists and is not a heritage matter.

10. COMMENTS ON THE COUNCIL REPORT

Mr Kelly's Assessment on the Resource Consent Application (with respect to effects on Historic Heritage values):

- 10.1** In the *Introduction* to his assessment (and at various other places within that report) Mr Kelly refers to the “*rear of Parliament House*”. While I accept that the various heritage assessments and the conservation plans refer to the west elevation and western sub-precinct as a “*rear*” aspect to Parliament House, the proposal looks to reprioritize the west elevation of Parliament House and the sub-precinct as a new (but not primary) frontage to the way the Parliamentary Precinct can be approached, interpreted, and used. The reference to “*rear*” becomes a redundant term when the compositional values of the placement of the MUS is considered within the Parliamentary Precinct as a whole.
- 10.2** Mr Kelly states that “*a shorter building would be preferable*”.¹⁶ In the assessment of the application against provisions of the Proposed District Plan¹⁷ at G14 on page 42, Mr Kelly describes the issue of relative heights as the “*primary issue*” and that the disparity is “*significant*”. In the consideration of criterion G10 on page 42, Mr Kelly says that the proposal “*makes no attempt to marry in with the heritage buildings*”. In my view, the desire for architectural “*compatibility*” espoused in

16 Kelly, M. *Heritage Advisor Assessment on Resource Consent Application*, Section 4 – Assessment, Museum Street Building, p8.

17 The application was lodged prior to the notification of the WCC PDP.

HNZPT Information Sheet 12 through its reference to the architectural language of both the Beehive and Parliament House should be achieved without imitating, replicating, or mimicking their respective historical styles or details. I revert to Mr Davis and his response to this matter in the main, noting however that it is the application submitted that is to be assessed and not the proposition of alternatives (which have been explored).

- 10.3** I acknowledge the suggested conditions Mr Kelly advances and I do not take exception to them. At his suggested fifth bullet point (at page 46 and page 47 of his assessment) Mr Kelly refers to the capture of a “*photographic record*”. I would suggest that this would capture the ‘before construction’, ‘during construction’, and at ‘the completion of construction’ phases of the works. Equally, while Mr Kelly refers to “*photography*” another option advocated in the Section 6 *Policies* of the *Appendix 2; Parliament House Conservation Plan* at 6.1.2.27 recognises that “*the optimum means of recording the building is through 3-D scanning, particularly for the purposes of rebuilding and disaster rebuild*”. As such the condition might consider that recording option also and this would also address the proposed condition of consent in Mr Kelly’s Assessment at 1(a) on page 47.

Ms Duffell’s Urban Design Assessment

- 10.4** I am aware that the Council urban designer has expressed concerns that the shading of the west façade of Parliament House by the MUS Building (mainly in summer) will decrease the extent to which Parliament House will be visually appreciated and thus detract from its heritage value.
- 10.5** I do not consider this transient effect adversely affects the heritage values of Parliament House or its primacy within the Parliamentary Precinct, as stated above. Rather, I believe the enhancement of the Museum Street axis, framed in the first instance by Parliament House, is reinforced by the MUS Building. Collectively the relationship between the two buildings emphasises the values of Parliament House and enhances the perception of what has traditionally been considered a “rear” elevation to a higher value. I would expect that the enhancement of the pedestrian qualities of the area around MUS will provide increased opportunities for people

to benefit from the values of Parliament House and the wider Parliamentary Precinct.

10.6 At paragraph 8.1, Ms Duffell addresses a statement by the Wellington Architectural Centre. This statement was not a formal submission to the application and I am not aware of when or to whom the statement was made or its exact contents.¹⁸ However, from Ms Duffell's interpretation of the Architecture Centre's statement it does not appear that it raises any matters that I have not already considered. The issue of perceived adverse effects arising from the proposed link bridge are recognised in my Heritage Impact Assessment report as being less than minor and is an appropriate addition within the historic heritage area.

11. CONCLUSIONS

11.1 The AEE-H I prepared for the resource consent application recognised that while there are some adverse effects arising from the proposed works on the historic heritage fabric of Parliament House and the historic Museum Street Oak tree, there are positive effects associated with the project overall. In my opinion the proposed adaptive reuse of Parliament House and development of the new Museum Street and Ballantrae Place buildings and the enhancement of the associated landscaping of the western precinct are appropriate and supportable.

11.2 The purpose of the RMA is to promote the sustainable management of natural and physical resources. The WCC has, in the ODP, set out the purpose of meeting Council's obligation under the RMA to recognise historic heritage, and more particularly "*protect*" recognised historic heritage from "*inappropriate subdivision, use, and development*", as required by the RMA at section 6(f).¹⁹ The protection test focusses on the appropriateness of subdivision, use, and development and implies an openness to change and not a veto to it.

11.3 The MUS is a building designed in the round, acknowledging through an associated open landform treatment, that wider context. The compositional placement

¹⁸ A copy of the Architecture Centre's response is not included in Ms Duffell's assessment, so I have not been able to read the original response independently.

¹⁹ RMA Part 2 Section 6(f).

between both Parliament House to the east, and the Bowen State Building to the west, places the MUS in balance with these existing built elements. The separation from Parliament House maintains clarity and legibility to the west elevation of Parliament House and its interpretation. Carefully located and proportionally referenced, the proposed MUS Building is an appropriate addition within the historic heritage area.

- 11.4** The enhancement of the Museum Street axis, framed in the first instance by Parliament House, is reinforced by the MUS Building. Collectively the relationship between the two buildings emphasises the values of Parliament House, and enhances the perception of what has traditionally been considered a “rear” elevation to a higher value.
- 11.5** The detached nature of the BAL from the high-status heritage buildings within the Parliamentary Precinct is a positive attribute. The proposed BAL building has been designed as a “*recessive and discrete*”²⁰ building form; its scale and materiality responding to those qualities. Its relationship with the generally orthogonal parliamentary grid and position relative to the northern end of the MUS enhances the historically weaker relationship of the western precinct.
- 11.6** Relocation of a number of existing historic gates and lamp standards is proposed as a means of enhancing the continuity of these elements consistently across the Parliamentary Precinct providing legible definition to the Precinct on Bowen Street and on the western boundary and its relationship with the adjacent Bowen Campus.
- 11.7** The *Parliament Grounds* conservation plan (p71) recognises the values of the Museum Street Oak as being “*exceptional*” and that the Oak tree has a “*primary role in understanding the distinct heritage significance of the place*”.
- 11.8** In relation to submissions, it is important to note that the HNZPT submission is “*neutral*” and, in my view, its concerns have been addressed. Appropriate

20 Studio Pacific Architecture *Design Statement for the Future Accommodation Strategy, Issue F, FINAL Revision 2* 14 February 2022, Section 5.3.1.

development is recognised by HNZPT in the guidance they offer where “the proposed works aim to protect and enhance the heritage significance of the Precinct while increasing the viability of the asset overall”.²¹

11.9 In my view, the setback from the western elevation of Parliament House, the enhanced pedestrian activations of the spaces between the buildings, and the compositional reordering of the western precinct as an enhanced frontage are all appropriate and positive.

11.8 I consider the height of the MUS to be appropriate from a heritage perspective, noting that the the desire for “compatibility” espoused in HNZPT Information Sheet 12 through its reference to the architectural language of both the Beehive and Parliament House should be without imitating, replicating, or mimicking the respective historical styles or details of those assets.

11.9 I do not consider the transient shading effect of the western elevation of Parliament House adversely effects the heritage values of Parliament House or its primacy within the Parliamentary Precinct. Rather, I believe the enhancement of the Museum Street axis, framed in the first instance by Parliament House, is reinforced by the MUS Building. Collectively the relationship between the two buildings emphasises the values of Parliament House and enhances the perception of what has traditionally been considered a “rear” elevation to a higher value.

11.10 Overall I believe the proposal is appropriate and supportable.

Adam Wild fnzia

15 May 2023

²¹ HNZPT Guideline 10 *For Developing Heritage Buildings*, 2000, p2.