

## Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for Ministers of the Crown to provide comments to the Minister for the Environment on the decision to refer projects to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

<b>Minister or agency providing comment</b>	Heritage New Zealand Pouhere Taonga
<b>Contact person</b> (if follow-up is required)	Jamie Jacobs
	Director, Central Region
	s 9(2)(a)

### Comment form

Please use the table below to comment on each application.

<b>Project name</b>	Adaptation of the Executive Wing of Parliament
<b>General comment and recommendation</b>	<p>Heritage New Zealand Pouhere Taonga has assessed the referral application, with input from specialist regional heritage staff.</p> <p>On the basis of the information provided, Heritage New Zealand Pouhere Taonga <b>oppose</b> this project being referred to an expert panel for consideration of consent applications and any notices of requirement.</p> <p>The project does not help to achieve the purpose of the Act as it does not promote the protection of historic heritage; it will result in the demolition of significant heritage. In addition, the project is likely to have considerable public interest and this is better taken into account through the standard RMA processes.</p> <p>If the project is referred, Heritage New Zealand Pouhere Taonga recommends that:</p> <ul style="list-style-type: none"> <li>• the application should include in-depth heritage assessment including an assessment against the conservation plan to ensure that the best practice principles are employed for the management and care of this building.</li> <li>• the panel should invite the following people/organisations to comment on the application: <ul style="list-style-type: none"> <li>• ICOMOS New Zealand</li> <li>• DOCOMOMO</li> <li>• Historic Places Aotearoa</li> <li>• Historic Places Wellington</li> <li>• The Wellington Civic Trust</li> <li>• NZIA</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• The Architectural Centre</li> <li>• Dr Jessica Halliday, Director of Te Putahi: Christchurch Centre for Architecture and City Making</li> <li>• Port Nicholson Block Settlement Trust</li> <li>• Dr John E. Martin, Parliamentary Historian</li> </ul>
<p><b>Historic heritage values</b></p>	<p>The Executive Wing of Parliament, the Beehive, is of outstanding and special heritage value, unique in New Zealand. It is:</p> <ul style="list-style-type: none"> <li>• A category 1 historic place entered on the New Zealand Heritage List /Rārangī Kōrero for outstanding or special historic importance. <a href="http://www.heritage.org.nz/the-list/details/9629">http://www.heritage.org.nz/the-list/details/9629</a>.</li> <li>• within the Government Centre Historic Area. <a href="http://www.heritage.org.nz/the-list/details/7035">http://www.heritage.org.nz/the-list/details/7035</a>.</li> <li>• The historic places and the area are scheduled on the District Plan.</li> </ul> <p>The two-storied marble-clad Press Gallery is not an addition or an annexe, it is an integral part of the Executive Wing, part of the original design. The removal of most of the Press Gallery is a partial demolition of the Beehive and a loss of significant heritage fabric.</p> <p>While the new design might be thoughtfully conceived and reference the remaining buildings, it does not follow conservation principles because authenticity is lost through demolition. The new building in front of the Beehive drum is much bigger, obscuring much of the west of the Beehive. The new building is significantly taller than the current Press Gallery.</p>
<p><b>Archaeological sites</b></p>	<p>The applicant has not yet approached HNZPT about archaeological authority requirements.</p> <p>HNZPT will be actively communicating with the applicant about requirements for archaeological authorities.</p>

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# Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for local authorities to provide comments to the Minister for the Environment on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Local authority providing comment	Wellington City Council
Contact person (if follow-up is required)	Tyro Underhill
	s 9(2)(a)
	Consents Planner

## Comment form

Please use the table below to comment on the application.

Project name	Adaptation of the Executive wing of Parliament.
General comment – potential benefits	<p>The proposal would see the alteration and extension to the executive wing of Parliament by:</p> <ul style="list-style-type: none"> <li>- demolishing the existing press gallery which is part of a heritage building and earthquake building</li> </ul> <p>We consider that this project could have the following benefits:</p> <ul style="list-style-type: none"> <li>- The construction of the new building will provide additional floor space to accommodate new ministerial suites</li> <li>- New employment opportunities will be created both during construction and prior to construction associated with the new development.</li> </ul>
General comment – significant issues	<p>The Beehive (Executive Wing) is a listed heritage item in the District Plan and has been assessed as a key component in the Parliamentary Precinct Heritage Area.</p> <p>Previous formal advice given to the applicant was that the proposal will result in the significant loss of heritage values to the existing building through:</p> <ul style="list-style-type: none"> <li>• The removal of a significant section of the existing building fabric,</li> <li>• The removal of existing hard landscaping (boundary walls), which match those located elsewhere onsite and</li> <li>• The addition of a significantly larger building that is out of scale and proportion to the existing buildings located on site.</li> </ul> <p>In addition, the proposed new building/addition would fail to meet most of the criteria listed under the district plan rules for the site.</p>

	<p>As such the proposal was not supported from the Council’s Urban Design or Heritage advisors/experts.</p> <p>The main issues identified included the following:</p> <ul style="list-style-type: none"> <li>• The existing Press Gallery building has a heritage listing. Its removal is therefore contrary to District Plan objectives and policies.</li> <li>• As proposed, the replacement design has many similarities in exterior appearance to the drum of the Beehive. Combined with its bulk, this sets the new portion of building up to visually compete with the Beehive, particularly when viewed from Bowen Street.</li> <li>• When viewed from Bowen Street the new structure appears that it may largely obscure the lower drum of the Beehive. The proposed cantilever also mirrors that at the base of the Beehive – the reference is noted but the result is awkward with a small-scale cantilever topped by a full drum-height building. The Beehive is unique in that it presents a circular building sitting atop a rectilinear plinth – setting another building up with the same of the conditions but with a different scale and shape means that this building creates a tension between difference and similarity that will affect the primacy of the Beehive.</li> <li>• The new building exceeds the height limit for the location.</li> <li>• The design does not appear to propose many windows at the ground floor facing Museum Street and remains ‘closed’ from this perspective.</li> </ul>
<p><b>Is Fast-track appropriate?</b></p>	<p>Fast-track is not considered inappropriate, however the issues/effects identified above would need to be addressed appropriately through the fast-track process.</p>
<p><b>Environmental compliance history</b></p>	<p>There is nothing on council records that identify compliance issues for the site with regards to the area where the proposed alterations are to occur.</p>
<p><b>Iwi and iwi authorities</b></p>	<p>The Council’s mandated iwi partners are:</p> <ul style="list-style-type: none"> <li>• Te Rūnanga o To Rangatira, 2/4 Nohorua Street, Takapuwahia, Porirua 5022</li> <li>• Port Nicholson Block Trust, PO Box 12164, Thorndon, Wellington 6011</li> </ul> <p>The site is not identified as a site of significance to iwi and it is not a Statutory Acknowledgement Area.</p>
<p><b>Relationship agreements under the RMA</b></p>	<p>WCC has no special relationship agreements under the RMA</p>
<p><b>Insert responses to other specific requests in the Minister’s letter (if applicable)</b></p>	<p>1. Are there any reasons that you consider it more appropriate for the project, or part of the project, to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the Act?</p> <p>This proposal is challenging District Plan provisions due to the scale and nature of what is proposed.</p> <p>This is a very prominent building on a site that is listed with significant heritage value, the nationally significant Parliamentary Precinct and other civic buildings. It is important that adequate information is supplied to ensure</p>

that the building is suitable for the context and does not detract from any heritage listed items.

As long as design and heritage considerations are managed the fast track consent process could be appropriate.

2. What assessments/consents are typically required for a proposal of this nature?

The proposal would need consent under the following District Plan rules:

- Rule 13.3.4: Central Area (alteration to existing building located in the central area) – Discretionary Restricted
- Rule 13.3.8: Central Area (alterations to buildings with height restrictions in heritage areas) – Discretionary Restricted
- Rule 21A.2.1: Heritage Buildings (demolition of any heritage building) – Discretionary Restricted
- Rule 21A.2.2: Heritage Buildings (any additions to heritage buildings) – Discretionary Restricted

Accordingly, the proposal would be assessed as a Discretionary Restricted Activity under the District Plan.

For a proposal of this nature the Council typically requires:

- An assessment against the Central Area Urban Design Guide
- A Design Statement, including a statement as to how the proposal achieves design excellence
- An assessment against the District Plan objectives and policies
- A heritage report prepared by a heritage expert
- Evidence of any consultation with iwi or Heritage New Zealand Pouhere Tāonga
- Conditions to be offered by the applicant to address effects

3. Do you consider that if consent applications for this project were lodged with the Wellington City Council, these would be limited or publicly notified? This information will help the Ministry understand whether the project would be likely to progress faster under the fast-track process compared to the standard RMA process.

Given the scale of the works, the location of the site in a highly visible heritage area and the advice provided by Council's heritage and urban design experts (who do not support the proposal) it is likely that the proposal in its current form would be publicly notified if it was lodged as a resource consent with Wellington City Council.

4. Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your city?

	The Council is not aware of any compliance issues relating to the Parliamentary Service in Wellington City.
<b>Other considerations</b>	We are able to provide you with the pre-application meeting notes should you require these.

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

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# Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for local authorities to provide comments to the Minister for the Environment on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Local authority providing comment	Greater Wellington Regional Council
Contact person (if follow-up is required)	Anna Martin Senior Resource Advisor, Environmental Regulation s 9(2)(a)

## Comment form

Please use the table below to comment on the application.

Project name	Adaptation of the Executive Wing of Parliament
General comment – potential benefits	GWRC has not quantified the benefits for the district/region
General comment – significant issues	There is insufficient information to determine effects on the natural environment.
Is Fast-track appropriate?	Yes
Environmental compliance history	There is no compliance history for this applicant.
Iwi and iwi authorities	Te Rūnanga o Toa Rangatira Inc. Port Nicholson Block Settlement Trust
Relationship agreements under the RMA	None
Insert responses to other specific requests in the Minister's letter (if applicable)	<p><b>In the ministers letter, it was requested that we provide responses to the following questions:</b></p> <ol style="list-style-type: none"> <li><b>Are there any reasons that you consider it more appropriate for the project, or part of the project, to proceed through existing Resource Management Act 1991 consenting processes rather than the processes in the Act?</b></li> </ol> <p>Provided the applicant adequately addresses potential adverse effects from our comments to question no.3 below, we have no concerns with this consent being processed through the fast track (covid-19) Act.</p>

**2. Do you consider that if the consent applications were lodged with the regional council that they would be limited or publically notified?**

Without further information as to the effects on groundwater, the discharge from dewatering, or potential ground settling, we cannot answer this question with any certainty.

**3. Clarification about any likely regional consent requirements and issues**

These works may require a resource consent for the following activities:

- Interception of groundwater
- Dewatering (which could also result in settlement of the surrounding land)
- Discharges from contaminated land

We cannot confirm the activity status of these activities without further information. Therefore we would recommend the applicant undertake:

- The applicant employs a suitably qualified contaminated land expert to undertake a preliminary site assessment (PSI) to determine the levels of contamination within the site, and factor in the results when designing their erosion and sediment controls.
- The applicant employs a geotechnical engineer undertake an assessment of the geology and groundwater conditions, and the potential for settlement of surrounding sites.
- The applicant undertakes an assessment of how they will treat and dispose of any groundwater that they are proposing to extract for dewatering purposes. This will likely need to be undertaken in consultation with Wellington Water Limited.

Greater Wellington Regional Council's (GWRC) Senior Environmental Scientist determined the proposed works may intercept groundwater at this location, however GWRC does not have sufficient information on groundwater or geology in this area to determine the potential effects.

**4. Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your region?**

No

Other considerations

No

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.