

Invitation for Comment on Molesworth Street Office development

Molesworth Street Office development is a Referred Project under the COVID-19 Recovery (Fast-track Consenting) Act 2020

Application name	Molesworth Street Office development
EPA reference	FTC000021
Applicant/s	Prime Property Group Limited
Comments due by	22 July 2021
Accessing the application	https://www.epa.govt.nz/fast-track-consenting/referred-projects/molesworth-street-office-development/the-application/

An application has been made by Prime Property Group Limited (the applicant) under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the act) for resource consents. The scope of this project is to construct a 12-storey office building that includes retail or café space, a lobby, loading bays, and basement carpark.

To comment on the project application, please fill in the details on the attached form and:

- **Email** the form to Molesworthfasttrack@epa.govt.nz . Please mark in the subject line: “Comments on Molesworth Street Office development Fast Track Application (Your name/organisation) by **22 July 2021**”; or
- **Post** the form to Molesworth Street Office development Fast Track Application, Environmental Protection Authority, Private Bag 63002, Waterloo Quay, Wellington 6140 in time for the form to be received by the **22 July 2021**; or
- **Deliver in person** to Environmental Protection Authority, Grant Thornton House, Level 10, 215 Lambton Quay, Wellington by **22 July 2021**. Please note that due to potential changes in COVID-19 Alert Levels our reception may not be open to the public. We suggest phoning ahead to check.

Comments must be received by the EPA, on behalf of the Molesworth Street Office development Expert Consenting Panel, no later than **22 July 2021**.

If your comment is not received by the EPA by **22 July 2021** the Panel is not required to consider your comment (although it may decide to). Under the COVID-19 Recovery (Fast-track Consenting) Act 2020 there is no right to seek a waiver of the time limit.

If you are an iwi authority you may share the consent application with hapū whose rohe is in the project area in the application, and choose to include comments from the hapū with any comments you may wish to provide.

Important information

Your personal information will be held by the EPA and used in relation to the project consent application process. You have the right to access and correct personal information held by the EPA.

A copy of your comments, including all personal information, will be provided to the Expert Consenting Panel and the applicant.

All comments received on the application will be available on the EPA website.

If you are a corporate entity making comments on this application, your full contact details will be publicly available. For individuals, your name will be publicly available but your contact details (phone number, address, and email) will not be publicly available.

Please do not use copyright material without the permission of the copyright holder.

All information held by the EPA is subject to the Official Information Act 1982.

More information on the fast-track consenting process can be found at <https://www.epa.govt.nz/fast-track-consenting/about/>.

Your Comment on the Molesworth Street Office development

All sections of this form with an asterisk (*) are mandatory.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Heritage New Zealand Pouhere Taonga
*First name	Barbara
*Last name	Rouse
Postal address	P O Box 2629 Wellington 6140
*Home phone / Mobile phone	[REDACTED]
*Email (a valid email address enables us to communicate efficiently with you)	brouse@heritage.org.nz
Submission prepared by:	Jamie Jacobs
Contact details	jjacobs@heritage.org.nz

2. *We will email you draft conditions of consent for your comment about this application

√	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct
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3. Please provide your comments on this application

Thank you for the opportunity to comment on the draft conditions. Heritage New Zealand proposes that potential effects on historic heritage / archaeological sites be addressed through appropriate conditions.

This application relates to a project to construct a new building in close proximity to a Historic Area entered on the New Zealand Heritage List/Rārangī Kōrero (the List): Government Centre Historic Area (List No. 7035). There is a scheduled heritage item in the Wellington City District Plan in the immediate vicinity of the subject property: Wellington Cathedral of St Paul, Ref. 441.

Heritage New Zealand considers the assessment of effects on built heritage is appropriate and, therefore, has no comment to make on associated conditions. The effects of construction activities on the adjacent built heritage can be adequately controlled by conditions on noise, vibration, dust and other construction effects.

However, the application and proposed / draft conditions fail to appropriately provide for the potential effects on historic heritage:

- the application did not include an archaeological assessment or an assessment of the effects on potential archaeological material relating to pre-1900 activity that occurred when Wellington was developing as a colonial settlement. This assessment would inform a condition/s on earthworks. The application also did not provide information on the depth of excavations undertaken when the previous building was constructed.
- The draft earthworks condition relating to archaeology only considers the potential for Māori pre-1900 activity, as assessed in the Cultural Impact Assessment. Heritage New Zealand does not support the condition relating to Accidental Discovery Protocol (ADP) unless the potential for all archaeological material is assessed as negligible or nil. Heritage New Zealand considers there could be unnecessary risk involved, with associated scheduling and fiscal impacts, for the project because archaeological material discovered under the ADP would result in works stopping and the Archaeological Authority process will be initiated.
- The applicant is therefore advised to commission an archaeological assessment to determine whether an archaeological authority under the Heritage New Zealand Pouhere Taonga Act is required.
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Draft condition number	Discussion	Change requested
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<p>Application, Earthworks (2); Earthworks Management Plan, 1.6 Accidental Discovery</p>	<p>The applicant has not yet applied for an archaeological authority; the application documentation does not indicate or propose the applicant has or will investigate the archaeological potential of the site, or apply for an archaeological authority.</p> <p>It is in the applicant's best interests to investigate the archaeological potential of the site and (if recommended by that assessment) to apply for an archaeological authority as soon as practicable; obtaining an authority before work commences to avoid any delays to the project from the discovery of archaeological material.</p> <p>It is also critical that those undertaking the works understand their responsibilities under the Heritage New Zealand Pouhere Taonga Act.</p> <p>The existing condition has potential to leave the applicant and contractors at risk of complicity in archaeological site damage and it is essential that the condition is rectified.</p>	<p>New condition and advice note to be included in the Earthworks Management Plan:</p> <p><u>Archaeological Monitoring</u></p> <p>(a) <u>The consent holder shall undertake an archaeological assessment prior to the commencement of excavations.</u></p> <p>(b) <u>If the archaeological assessment concludes that an Archaeological Authority is required for all or part of the site, and if it is then granted by Heritage New Zealand Pouhere Taonga, monitoring and discovery protocols will be detailed as part of the Archaeological Authority documentation in an Archaeological Management Plan (AMP).</u></p> <p>(i) <u>The contractor/s will have access to the AMP and these conditions on-site and follow the procedures specified in the AMP should archaeological material, or suspected archaeological material, be uncovered as part of the works.</u></p> <p>(c) <u>If the Archaeological Assessment concludes that an Archaeological Authority is not required for all or part of the site then an Accidental Discovery Protocol (ADP) will be prepared in case of any archaeological, or suspected archaeological, discoveries that occur during construction in areas not covered by an Archaeological Authority.</u></p> <p>(ii) <u>Any ADP will be prepared in consultation with Heritage New Zealand Pouhere Taonga;</u></p> <p>(iii) <u>The contractor/s will have access to the ADP and these conditions on-site and follow the procedures specified in the ADP should archaeological material, or suspected archaeological material, be uncovered as part of the works.</u></p>
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Thank you for your comments