

28 March 2018

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Re: proposed HNZ listing Wellington Teachers' Training College (Former)

This submission is from the Architectural Centre. We are an incorporated society dating from 1946, which represents both professionals and non-professionals interested in the promotion of good design.

The Architectural Centre supports the Heritage New Zealand Pouhere Taonga listing of the Wellington Teachers' Training College (Former) and has the following comments to make:

1. **The Architectural Centre strongly supports this listing.** It is long over due. We consider that Heritage New Zealand (HNZ) has taken far too long to process an application to list this site, and there appears to be no excuse for this. For many years there has been no debate about the high heritage significance of the Wellington Teachers Training College (Former). The Heritage New Zealand Pouhere Taonga Act 2014 is clear that HNZ could have initiated and processed an application many years ago, independent of any external nomination. At s67(1), the Act states that "*Heritage New Zealand Pouhere Taonga or any other person may apply to Heritage New Zealand Pouhere Taonga to enter a historic place or historic area on the New Zealand Heritage List/Rārangi Kōrero.*" The previous Historic Places Act 1993 had similar wording (s24(1)). This is an important point. We recommend that HNZ proactively encourage internal nominations of historic places from HNZ staff, rather than waiting for external nominations in all cases.
2. We note the WCC correspondence with HNZ (13 March 2018) requesting that this listing process be suspended, suggesting that a suspension is necessary in order to establish a partnership between HNZ, Rymans and the WCC. We have the following points to make in this regard:
 - (i) **HNZ does not have "suspension" of a listing legally available to it within the listing process** defined in the Heritage New Zealand Pouhere Taonga Act. Instead the Act states that once HNZ "*is satisfied that an application is supported by sufficient evidence, it **must** proceed to determine the application*" (s67(4), emphasis added).
 - (ii) The Centre does not consider that any collaborative partnership, as suggested by WCC, is reliant on undermining the listing process. **The listing process is an evaluation of the heritage merit of the site, and must be independent of plans for site development.** We would be highly concerned if HNZ compromised the listing process by "accommodating" or "anticipating" development by not recognising heritage in accordance with its statutory obligations.
 - (iii) In s74 of the Act:



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- (a) HNZ "*may make recommendations to the local authorities that have jurisdiction ... as to the appropriate measures that those local authorities should take to assist in the conservation and protection of the historic area*" (s74(1)),
- (b) "*[l]ocal authorities must have particular regard to a recommendation received under subsection (1)*" (s74(3)), and
- (c) "*[i]n making a recommendation ... Heritage New Zealand Pouhere Taonga ... must recognise the interests of an owner*" (s74(4)).

We consider that **it is within this scope defined under s74 of the HNZPT Act that HNZ should participate in discussions relating to the WCC proposed master planning**, not in any undermining of the listing process.

3. **We strongly encourage HNZ to be proactive in facilitating the adaptive reuse of the Wellington Teachers Training College (Former)**, including lobbying WCC for financial generosity when considering any resource consent to utilise the existing buildings by current owners in order to reward best practice heritage re-use (e.g. temporary rates relief, consideration of heritage values in relation to showing leniency with respect to current building code standards being met). As we have indicated previously, we see great potential in the Wellington Teachers Training College (Former) site as a Wellington "Barbican," supporting heritage, arts and culture through the provision of residential and community (art gallery, sports, community lectures and events) uses. We see this potential as best being met through adaptive reuse.
4. Consequently, we are disappointed that the WCC correspondence (13 March 2018) appears uninterested in facilitating the adaptive re-use of the existing Karori campus buildings as the prime mode of achieving Ryman's retirement village. We consider that, as a responsible council, which advocates for heritage and for sustainability, WCC's prime duty is to meaningfully support strategies such as adaptive reuse. We also note that **the form and massing of the site reflects highly successful integrated master planning which should be taken advantage of**. The Centre strongly recommends that HNZ lobby the WCC to facilitate a design competition in order to use the Teachers College site as an exemplar for adaptive reuse.
5. The Centre believes that the current scope of **HNZ listings significantly under-represents mid- to late-twentieth-century New Zealand architecture** and we ask that this bias be rectified immediately, with at least 75% of the proposed work on listings this year to be dedicated to the evaluation and recognition of modernist buildings and sites. A component of this work must include public education regarding the value of modernist historic heritage and the need for heritage protection for these sites and buildings. We consider that HNZ has been complacent in this regard.
6. The current threats to the Wellington Teachers' Training College (Former) is demonstrative of **the vulnerability of heritage buildings owned by government departments and state entities**. The recent destruction of the heritage values of the Bowen State building (and the modernist government precinct as a whole), and the threats to Gordon Wilson Memorial Flats, are recent Wellington examples. The removal of the native timbers in the Beehive demonstrates another example of poor understanding of modernist heritage conservation in past decades. Consequently, the Centre believes that HNZ must be much more pro-active in:
 - (i) its recognition of state-owned modernist buildings through the listing process,
 - (ii) working with the Ministry of Culture and Heritage (MCH) to support government departments and state-owned entities to achieve positive heritage outcomes as historic heritage building users (as both owners and

tenants), in accordance with MCH's "Policy for Government Departments' management of Historic Heritage 2004,"¹ including its policies for recognition (policy 3) and protection of historic heritage values of buildings to be disposed (policy 13).

- (iii) lobbying for the extension of the "Policy for Government Departments' management of Historic Heritage 2004" to include the full range of State Entities, including universities, and
- (iv) the public education and promotion of better heritage outcomes for modernist government architecture.

7. We are conscious that HNZ listing provides no legal protection. This is an important issue in this instance given the significance of the site, as demonstrated by the documentation supplied in support of HNZ listing. We therefore ask that HNZ effect legal protection over the site as follows:

- (i) **lodge a Notice of Requirement** for a Heritage Order over the site.
- (ii) **lobby the WCC to list the site** on the heritage schedule of the District Plan.

These actions are important to ensure the long term protection of the site. Our suggested action of HNZ lodging a Notice of Requirement for a Heritage Order will provide sufficient protection until the site is listed on the Wellington District Plan, or longer if deemed appropriate. This is necessary as **HNZ no longer has recourse to interim registration** because the Heritage New Zealand Pouhere Taonga Act removed the ability for interim registration that was available under the Historic Places Act 1993. This interim registration provided the same level of protection as a Notice of Requirement for a Heritage Order under the RMA (ss194-195), and its removal from the Heritage New Zealand Pouhere Taonga Act is a significant deficiency.

Specific comments in relation to the listing documentation:

- 8. The executive summary (p. 3) has incorrect information regarding the architect of the complex. Bill Toomath was born in 1925 (not 1928). His legal name was Stanley William Toomath (not William Toomath). This is correct later in the documentation (p. 29).
- 9. The current Speaker, Rt. Hon. Trevor Mallard, is referred to as "later Labour Party Member of Parliament" (p. 11). While this is correct, we understand it would be more appropriate to refer to his positions as a Minister and Speaker of the House.
- 10. There is reference made to Akopai marae (p. 12-13). We understand that the wharenui was the former Karori Scout Hall, the master carver of the house was Clarence Takirangi, and the carver of the waharoa was Dean Whiting. Given the importance of Akopai to support Māori studies at the college, and the reference to the college's role in the "Māori renaissance" (p. 11), we are surprised of the apparent omission of any contribution from the HNZ's Māori heritage advisors in the listing documentation.
- 11. There is reference to the transfer of the site from the Ministry of Education to Victoria University (p. 14). We think it is appropriate, given the significant public interest in the transfer of ownership of the site from the Ministry of Education to VUW, that additional information is provided. Specifically we suggest that background information is included, namely that:
 - (i) the transfer was enabled by the agreement by Cabinet in October 2009 (CAB Min (09) 38/12) to allow tertiary education institutions to obtain the

¹ Ministry for Culture and Heritage "Policy for Government departments' management of historic heritage 2004" (August 2004) <https://mch.govt.nz/research-publications/our-research-reports/policy-government-departments-management-historic-heritag>

legal title to Crown assets which they had an ongoing educational need for, and

- (ii) the transfer of ownership cost VUW \$10, a matter of great public concern, particularly when it was observed in the media that VUW was anticipating privately selling the site for \$20 million approx.

12. The ceramicist and head of the college's Art Department for over 20 years, Doreen Blumhardt, is referred to on p. 15. We understand her kiln is an integral part of the site. Blumhardt was a member of the Architectural Centre, and was also made a Dame Companion of the New Zealand Order of Merit (2009). We consider that, like Tipene O'Regan (pp. 11-12), she is a figure associated with the Training College site who merits more than a single mention. Her house (Blumhardt House, 1957), designed by Architectural Centre member Tony Treadwell who was in practice with life member Allan Wild (Treadwell and Wild), is no doubt on HNZ's radar as a possible HNZ listing, given its design merit and associations with Blumhardt and the Architectural Centre.

13. Brutalism is frequently referred to as an "aesthetic" (e.g. pp. 4, 20, 27, 38). There is even reference to the college buildings as having "*applied* exterior concrete textures" (p. 35 emphasis added). This terminology is incorrect, and contemporary references were to "natural concrete," meaning that textures were a result of construction processes and not applied. Philosophically, Modernism, and late Brutalism, is about material integrity derived from building philosophy, function, structure and construction, not from narrow aesthetic drivers, including applied surfaces. We also note that the description of concrete work contains some contradictions. For example, there is reference to concrete blocks as a mass-produced material (p. 27), which is presented as the reason why Brutalism used *béton brut*. Most (perhaps all) Brutalist *béton brut* is poured insitu concrete, not concrete block with an applied rough cast.

14. There is reference to Toomath setting up an architectural practice on his return to Wellington (p. 30). We understand that this is not strictly correct as he worked for Bernard Johns on his arrival back to Wellington, including his work on Wool House, prior to establishing an architectural practice. Toomath was not only actively involved in the Architectural Centre right up until his death in 2014, he was also a life member and the President of the Centre in 1960.

15. The book *Long Live the Modern* is referred to as the "definitive survey of New Zealand's Modernist architecture" (p. 34). This is incorrect. The introduction to *Long Live the Modern* is explicit regarding this:

The list of places is *in no way definitive*. It is offered as *a starting point rather than an end point*, identifying and presenting multiple subjects for reference and comparison for those who are faced with the task of assessing the heritage values of individual modern buildings" (p. 2, emphasis added).

There are numerous other books which are also significant in relation to evaluating New Zealand modernism (e.g. Mitchell and Chaplin's *The Elegant Shed*, Shaw's *New Zealand Architecture*), and numerous articles and conference papers on relevant subjects which are not incorporated into a convenient published book format. Perhaps more importantly, there is an enormous amount of research on New Zealand modernism still yet to happen that will likely reveal additional important modernist works, and the significance of currently under-appreciated buildings.

16. While the Centre acknowledges that *Long Live the Modern* is in a format which makes it easy for organisations like HNZ to find brief information on specific modernist buildings, the ease of this format is dangerous in that it appears that HNZ is using the book *as if* it is definitive, including using inclusion and omission

in the book to assert varying degrees of heritage value (e.g. p. 28). We are concerned about this naive use of the book, and the potential negative consequences for the recognition of New Zealand's modernist historic heritage. We consider that it is important that HNZ not become wedded to a singular source (such as *LLtM*) at the risk of being out of date and/or misinformed in its listing evaluations. This is not the first time we have come across HNZ's use of *LLtM* in this way and we consider it lazy, irresponsible, and inaccurate. We expect a higher level of research integrity and evaluation of historic heritage than this from such an important organisation.

17. Reference to Frankfurt's Deutsches Architekturmuseum *SOS Brutalism* exhibition (2017-2018) and associated catalogue, which includes the Wellington Teachers' Training College (Former) as one of two New Zealand examples of Brutalism, will be relevant to the listing. Copies of this catalogue are in the VUW architecture and design library.
18. The Centre recognises the importance of the site as a whole landscape (including the siting and massing of buildings, and integration of building and landscape design (e.g. Lopdell Gardens)), and considers this aspect requires greater emphasis in the listing documentation.

Thank you for this opportunity to comment on the proposed HNZ listing of Wellington Teachers' Training College (former). We consider this complex and site to be of extreme significance in New Zealand and support all measures to recognise and protect it. If you have any questions arising from our submission please do not hesitate to contact us.

Yours faithfully



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- cc. Hon. Grant Robertson, Wellington Central MP
- cc. Diane Calvert, WCC councillor, Onslow-Western Ward
- cc. Andy Foster, WCC councillor, Onslow-Western Ward; Portfolio Leader Karori Framework
- cc. Simon Wolff, WCC councillor, Onslow-Western Ward