

31 October 2012

Attn: Development Planning and Compliance  
Wellington City Council  
P.O. Box 2199  
Wellington

cc. c/- Constantine Anastasiou  
P.O. Box 10779  
The Terrace  
Wellington 6143

**Re: Service Request Number: 263649: Notified Resource Consent - Harcourts Building, 30 Grey Street/203-213 Lambton Quay**

This submission is from the Architectural Centre, an incorporated society dating from 1946, which represents both professionals and non-professionals interested in the promotion of good design. Any Architectural Centre members who work for companies involved in this Resource Consent application (and hence having a potential or actual conflict of interest), have not been involved in the writing of this submission.

The Architectural Centre opposes this application for Resource Consent for the reasons stated below.

**(1) The insufficient nature of the Resource Consent.**

The Architectural Centre considers that approving this Resource Consent will set a dangerous precedent. This is a consent application to demolish a listed heritage building. Considering granting this application is a step which cannot be lightly taken, and must also take into account detailed information (including drawings) regarding whatever is proposed to be built on the site. Instead the proposal (Annexure 9 Replacement Building) describes a list of sustainable technologies rather than a new building, which cannot be assessed comprehensively. It states:

"After the demolition of the Harcourt's Building it is the Applicant's intention to construct an extension to the adjacent HSBC Tower Building on the Harcourt's site and to integrate the new structure into the existing HSBC Tower. ... The New[sic] building would be a safe modern building meeting and exceeding 100% of the New Building Standard. It would be a sustainable green building with efficient office space configuration incorporating double-glazing and a high performance glass facade to deliver energy efficiency ... It will also provide for and accommodate rain harvesting; grey water recycling; passive solar and natural and borrowed light options; use of sustainable materials; life-cycle analysis; and other energy efficient technologies."

It is difficult to assess a consent for demolition without knowing in detail what is proposed to replace it. We refer to the first point in the Architectural Centre Manifesto: "Architecture must be better than what it replaces." We also note that an argument to demolish is easy to make on economic grounds simply because it is difficult to put a monetary value on heritage/character. Some have though, including Don Rypkema (PlaceEconomics).

**(2) The significance of the building.**

Harcourts Building (formerly the Australian Temperance and General Mutual Life Assurance Society Limited Head office) is listed in the District Plan's Heritage List, and has a Category 1 NZ Historic Places Trust registration.



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Its significance is multiple. The building:

- (a) is representative of a significant late 1920s transitional styled-building between the Classical Revival and Art Deco.
- (b) is a high-quality example of architecture from the period, in terms of aesthetics, proportions, physical construction and sculptural shaping of the facade, and as one of Wellington's biggest buildings of the time.
- (c) supports the scale and proportion of the nearby Harbour City Centre (formerly DIC department store) and so positively contributes to Lambton Quay's streetscape. Large heritage buildings like the Harcourts Building are rare along Lambton Quay. We believe the building also fills an important role in terms of an elegant background context to the activity of the street.
- (d) has historic significance as a building associated with the Australian Temperance and General Mutual Life Assurance Society.

### **(3) The need for a Wider Wellington Strategy in the current context**

In addition to the above comments we would also like to recognise that this Resource Consent application represents the difficult situation that many building owners find themselves in due to the current need to either strengthen or demolish earthquake-prone buildings in an economically fragile context. As the building owner of the Harcourts Building has queried "Who pays?" But if permission is given to demolish a building (heritage or otherwise), the Architectural Centre believes that building owner/s must have a proposal for a better building or landscape to replace the demolished building and must be bonded to constructing this within a specified timeframe.

We acknowledge that the Wellington City Council has attempted to identify key issues regarding this dilemma, and that this is a difficult, city-wide problem. Strategic thinking, and policy development is needed (e.g. specifically related to the value of physical heritage fabric, the plausibility or not of replication of heritage buildings) or Wellington will become a cityscape with too many carparks, or the glass-boxed, tilt-up city that Christchurch is fast becoming.

### **(4) The credibility of the District Plan Heritage List and NZHPT Registration**

The fact that buildings, which have demonstrated their community significance through District Plan listings, and NZHPT registrations, are still vulnerable to demolition suggests that either the council does not believe or endorse its own processes to recognise heritage buildings, and that unlisted character or heritage buildings really have no absolutely hope of survival in this context, which has huge implications for the long-term nature of the city. What does the reception of a Resource Consent application like this say about our belief in our current heritage processes?

We appreciate this opportunity to make a submission on this Resource Consent application, and we also consider that it was very important that this Resource Consent be publicly notified (rather than approved without public input), because it highlights key issues regarding heritage buildings and the current heritage processes which if undermined need substantial public debate.

Yours faithfully

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