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Re: Plan Change 81: Rezoning 320 The Terrace and de-listing the Gordon Wilson Flats

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. Members with conflicts of interest have not had input into this submission.

The Centre opposes Plan Change 81. Our reasons are listed below.

1. Rezoning 320 The Terrace from Inner Residential Area to Institutional Precinct

We do not support rezoning an Inner Residential Area. This is because:

- a. there is currently a nationwide shortage of housing, and an identified need to increase social and affordable housing. The significance of this is reflected in government interest in a clause relating to the provision of affordable housing as a matter of national importance in s6 of the RMA.
- b. a reduction in areas available for the provision of housing would undermine city council strategies and policies for increasing the density of inner city housing in Wellington.¹
- c. there is a particular need in housing for 1-2 bedroom accommodation, and an oversupply of 3-4 bedroom dwellings in the city. One to two bedroom accommodation is provided for by the Gordon Wilson Flats.
- d. the Gordon Wilson Flats was built to accommodate over 300² people and in 2012 it accommodated over 130 tenants (WCC Heritage Inventory p. 4). It has significant potential to positively contribute to housing supply.

2. Proposed removal of the 'Gordon Wilson Flats' from the Wellington City District Plan's heritage list

We oppose the removal of Gordon Wilson Flats from the WCC District Plan because:

- a. the removal of a building from a District Plan heritage list must be an extremely rare event and due to exceptional circumstances, not for the convenience of businesses. We are concerned about the precedent that may be set here: that a business can knowingly purchase a listed building in need of TLC, and get it removed from the DP Heritage List primarily because of repair costs and a mismatch with its preferred development plans. This is especially pertinent in this case because of the general under appreciation of modernist architecture in New Zealand. Protecting buildings from this era (including getting them listed on District Plans) is difficult. The Gordon Wilson Flats are important in the history of the development of modern architecture in New Zealand, and social housing in particular.
- b. the inclusion of this building in the heritage list was for very good reasons. The WCC heritage inventory justifying its inclusion has been recently

¹ Such initiatives at the council level include: the identification of areas for medium-density housing, the growth spine, the infill housing review and the housing choice & town centre planning project.

² The building has 12 bedsits, 70 maisonettes with two double bedrooms and 5 maisonettes with a double and a single bedroom.



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updated (May 2012) suggesting that the WCC considers this building's heritage value is highly current.³

- c. the removal of the building from the Heritage List would appear to reward the inadequate maintenance of a heritage building, which should not be encouraged due to health and safety risks and the detriment to the city's heritage, undermining the very reasons for having a Heritage List.
- d. the stated economic arguments are not relevant, and could have been foreseen at the time the site was purchased. If the retention of the Gordon Wilson Flats is not economic then VUW either made the decision to buy the building and site with the knowledge that it was not an economic proposition, or they did not carry out due diligence. We assume that VUW has the resources to make an informed purchase and would have been aware when they recently purchased the building that it was a heritage building which would require significant work. No doubt this was factored into the cost they agreed to.
- e. a similar argument can be made with respect to non-compliance. The building's two years of discontinued use would have occurred prior to, or near, the time that VUW purchased the building in 2014. This cannot be argued to have been unforeseen by the purchasers. These are important points as buying into a situation, which inherits the problems of deferred maintenance or the consequences of discontinued use, is not a valid reason for de-listing heritage.
- f. the university's strategic plan is not a planning document relevant for considering resource consent applications.
- g. the grounds for stating that a curtain wall would "materially affect the heritage significance of the building" (Wareham Cameron + Co Building Condition & Options Assessment, p. 2) is not apparent. This would depend on the design of the curtain wall (no details for a proposal are given), but also needs to be argued in relation to the values identified in the heritage assessment. The building is a monolithic block aesthetically capable of accommodating a curtain wall facade. We understand that the current "curtain wall" is timber, and we anticipate that an aluminium curtain wall could be made with the same profile sizes. An engineered timber solution might be "chunkier" than the current design. Retention of the existing module proportions (including thicknesses of elements) is more important than the retention of the original physical fabric, especially given modernist interest in progressive building materials and technologies. The heritage assessment identified the building's historical significance and social significance as considerable, and these values are not affected by minor aesthetic changes to the building, nor the replacement of original building fabric. Identification of the aesthetic and formal qualities of the building elements which have heritage significance, is needed to inform the design of a new exterior.

Heritage values of the building include:

- h. the building is a rare typology in New Zealand (being a monolithic highrise tower block state housing (c.f. multi-storey) i.e. one of two buildings in New Zealand; the other being Grays Ave Flats), and is "one of the largest public housing projects undertaken in the country."⁴
- i. the internal planning (i.e. maisonette) is a rare apartment form in New Zealand social/state housing. This planning is associated with innovative modernist design in Europe (e.g. Le Corbusier's Unité d'habitation). As such it documents international influences in New Zealand social housing.

³ The building was included in the 1995 Heritage Inventory. "Gordon Wilson Flats" *WCC Heritage Inventory* (1995) vol.3 : O-Z. n.p.

⁴ "Gordon Wilson Flats" *WCC Heritage Inventory* (1995) vol.3 : O-Z. n.p.

- j. the building is closely connected to important social innovations in New Zealand's history and is representative of the then Labour government's last attempt to adopt high-rise residential buildings to address housing shortages
- k. the building has a close association with a prominent New Zealander (Gordon Wilson) as the designer of the building, and because the building is named after him. This is a very rare example of a building being named after its architect on completion (c.f. Anscombe Flats was originally named by Edmund Anscombe "Lynfield").
- l. the building has important spatial relationships to McClean Flats (1943-44), is part of a high-rise social housing precinct, and has landmark values. It has been recognised as "creating a new urban scale."⁵
- m. because of the high historic and social heritage values, the retention of the building's residential function has higher heritage worth than the retention of the physical fabric of the facade.

Artifact Heritage Assessment

We consider that the heritage assessment undervalues the historic heritage value of the building. This is because:

- n. the heritage assessment is not aligned with the RMA definition of historic heritage. It excludes an evaluation of cultural qualities and includes separate assessments for aesthetic, functional, social and townscape categories. The effect of this is to reduce the overall assessment of heritage because the overall evaluation appears to be an averaging of individual ratings. This means that more categories will dilute the overall rating. Instead, we believe that the aesthetic, functional and townscape qualities should properly be included in the evaluation of architectural qualities, not as separate categories, to be consistent with the RMA definition.
- o. little or no weight has been given to the rarity of the building type (monolithic highrise state housing) in New Zealand under **architectural significance**
- p. the evaluation of no significance for **functional significance** appears to us to be incorrect. The heritage significance of the building function relates to its role as part of a significant national housing strategy at a time of high housing need. The fact that we appear to be experiencing similar issues at this very moment makes its functional significance particularly relevant. The viability of that function is related to an irresponsible attitude to maintenance by Housing New Zealand and is not relevant for an assessment of heritage values. Instead this relates to the economic viability of repairs. There has been no changes to the function that the building design can accommodate.
- q. little or no weight appears to have been given to the building's national significance in relation to social housing under **social significance**. For example, the fact that this building is "one of the largest public housing projects undertaken in the country,"⁶ does not appear to have been recognised in the evaluation.
- r. we agree that the heritage of the building is *at least* "considerable" in terms of **historical significance**.
- s. the assessment bases its evaluation of the significance of **scientific and technical** heritage values on insufficient information, and appears to confuse the heritage significance of the building's technological heritage (e.g. innovative for that time) with current engineering performance (which in this case is inconclusive). It appears to us that archival research (beyond internet image searches on the National Library website) is needed and ought to include examining relevant drawing, correspondence, and

⁵ "Gordon Wilson Flats" *WCC Heritage Inventory* (1995) vol.3 : O-Z. n.p.

⁶ "Gordon Wilson Flats" *WCC Heritage Inventory* (1995) vol.3 : O-Z. n.p.

construction files held at Archives New Zealand (and possibly the Wellington City Archives). This is likely to be less expensive than invasive engineering testing. Talking to people who worked in the Ministry of Works at the time (e.g. Jim Beard and Bill Alington) would also likely be valuable to understand the construction methods used. We are concerned that these simple steps to find out relevant information do not appear to have been undertaken.

- t. the assessment is largely descriptive rather than identifying, and arguing the reasons for, specific heritage values (e.g. the discussion regarding the heritage values of the interior appears to be largely absent).

Heritage New Zealand email

- u. The Heritage New Zealand email is strangely worded and appears to be insufficient because it does not actually give an opinion regarding de-listing or demolition, but rather states that it is Heritage New Zealand's position to raise no matters. There is no comment regarding the relevance or value of the WCC listing.

3. Proposed demolition of Gordon Wilson Flats

The Architectural Centre does not support the demolition of Gordon Wilson Flats. This is because:

- a. the building has significant heritage values (see discussion above).
- b. there is a shortage of inner city affordable housing (see discussion above).
- c. the current physical state of the building is largely a result of neglect via deferred maintenance of a heritage building.
- d. the structural report is not fatal; Rather it notes incomplete information ("there is currently no evidence that the foundation system is not satisfactorily supporting the building gravity loads" (p. ii); c.f. "the condition, arrangement and adequacy of the foundations are key to determining the performance of the building" (p. 5)). It does not appear that comprehensive archival research has been conducted to ascertain pile type (i.e. MoW correspondence and reports during construction in addition to further drawings and photographs at Archives New Zealand), or discussion with architects etc. who used to work at the MoW. We suggest this might be an important step towards understanding the foundation construction.
- e. the argument regarding internal planning appears to be flawed, given this is an inner-city building within easy walking distance to the CBD. Car use has been declining especially in age-groups likely to be target markets for any apartments. Uber is increasing becoming a more attractive option to car ownership. We find it difficult to believe the existing plan is inappropriate for staff offices, and some teaching spaces. It appears to us that the current plan would be able to accommodate staff offices, postgraduate and other research clusters, tutorial teaching and study spaces. Given increasing use of digital technologies, including internet teaching resources, the building might be able to provide appropriate spaces for a range of university functions. Areas of accommodation could of course also be included.
- f. the building has a beautiful aspect, great roof terrace and real development potential. We acknowledge there are some issues pertaining to circulation and the internal environment, but consider that these could both be addressed by competent design professionals.

In addition, as stated above under 2.

- g. we do not consider the stated economic arguments to be relevant. Those could have been foreseen at the time the site was purchased. No doubt this was factored into the cost agreed to.
- h. a similar argument can be made with respect to non-compliance. This cannot be argued to have been unforeseen by the purchasers. These are

important points as buying into a situation which inherits these problems is not a reason for de-listing heritage.

Maurice Clark letter

- a. this letter appears to be focused exclusively on weaknesses and so does not appear to be a balanced evaluation
- b. this letter contains an opinion which is relevant to the viability of the building restoration. This is a matter for due diligence to inform a purchase decision. It is not relevant to heritage value of the building. It is strange that this advice was not sought at the time of purchase (September 2014), but instead is dated 30 June 2015.

Thank you for this opportunity to comment on the proposed PC81. If you have any questions please do not hesitate to contact me.

Yours faithfully



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