

5 September 2007

Re: DPC 58 Proposed Additional Heritage Listings

This submission is from the Wellington Architectural Centre, a group which represents both professional and non-professionals interested in architecture and design, and in the promotion of good design in Wellington.

1) Support for DPC 58 Proposed Additional Heritage Listings

The Wellington Architectural Centre strongly supports the Proposed Additions to the current Heritage Listings. We particularly support the addition to the listings of the Former Church of Christ Building (1883/1907), the Eva Street Building (1930), the Former Hannah Footwear Factory (1940) and Old Wool House (1955-1958). We are particularly encouraged to see that existing structures to update the District Plan are able to be utilised for regular additions to the Heritage Listings and we strongly encourage the City Council to continue the momentum of regular reviews.

In particular we strongly encourage the Council to list the following buildings: the Hannah Playhouse, the Teachers' Training College, the Britten House, the Alington House, the Demonstration House, Freyberg Pool, Thorndon Mews, the Meteorological Office, the Forest and Bird (formerly Wellington City Mission Fielden Taylor Boys' Hotel), Jellicoe Towers, the Sutch House and the Kahn House. Details of these and other buildings we consider worthy of protection are listed in our submission for DPC 53.

2) Criteria for Listing

We believe a stronger and more explicit set of guidelines is needed for evaluating heritage to make the rationale for inclusion public and explicit. We point to established registration processes such as the NZHPT, and Docomomo as useful models. We also acknowledge the need to liaise with site/building owners, but we stress that the priorities of listing MUST come first. If a site/building/object has heritage value to the city, then the city has an obligation to list it as a heritage item to prevent its alteration or demolition, regardless of the wishes of the owners. This is an issue of communal and public, rather than private, interests.

3) Level of Protection

The level of protection offered to Futuna chapel has, in recent years, clearly demonstrated the limitations of Heritage Listings in the District Plan which are not appropriately detailed. We strongly urge that the particular aspects to be protected should be explicitly noted in each case. Interiors, and fixtures and fittings in particular need explicit listings. The Architectural Centre does not support facadism, and is disappointed to see that a number of entries in the Heritage List note that only the facade of a building is protected. We recommend that the minimum heritage listing for the external facade be designated as "facades and building structure" meaning that the front elevation and its ornamentation and structural detailing are retained, as are the building's side elevations and the building structure necessary to ensure meaningful spatial, scalar and proportional relationships are maintained (i.e. the relation between floor levels, and the facade proportions; the scale of the front to the side elevations).

In addition we are concerned about the apparent lack of effectiveness of systems re: violation of heritage sites. This needs to be strengthened, and in addition to public education strategies, appropriate penalties incurred. This must be a fair, transparent



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and consistent system, rather than an ineffectual and underutilised threat. If a financial penalty, amounts could productively be tied to land values.

4) Modernism/Post-War World II

The WCC Built Heritage Policy (2005) acknowledges the lack of appropriate recognition for modernist architecture in Wellington in its commitment to conducting "a heritage building survey focusing on post-World War II architecture in Wellington" (Objective I). While we acknowledge the intention to complete this work by June 2007, we consider that the proposed inclusions do not adequately address the current lack of modernist work, and we are disappointed that the work on the survey to date has not produced sufficient material to alter this. We strongly recommend the inclusion of the best work from Wellington's modernist architects including work of William Alington, James Beard, Charles Fearnley, Al Gabites, the Government Architect's Office/Ministry of Works, Frederick Ost, Barbara Parker, Ernst Plischke, Structon Group Architects, William Toomath, Anthony Treadwell, Allan Wild, Derek Wilson and Gordon Wilson, etc. We also consider that the work of modernist Town Planners and Landscape Architects also be listed where possible.

5) Heritage Fund

We were dismayed to note in the Annual Plan that the Heritage Fund had been reduced. We consider this to be due to a lack of public knowledge of the Heritage Fund - which is an important part of the city's strategy for protecting and maintaining heritage buildings - rather than a lack of need. The Council needs to advise all owners of buildings listed in the Heritage Schedule and Wellington Buildings with NZHPT registration of the fund and the criteria governing it. We believe a proactive strategy is needed here.

6) Recognition of Heritage by other Organisations

Other organisations (e.g. the NZHPT, Docomomo, the NZIA and the NZILA) are regularly researching and evaluating the heritage value of our built environment. There needs to be a formal mechanism where, for example, Wellington buildings with NZHPT registrations are fast-tracked into the Heritage Schedule. Examples include Plischke's Kahn House, and Alington's Alington House, Karori. The NZIA Enduring Architecture Awards should automatically be considered for inclusion in the Heritage Listings. Docomomo also has an internationally recognised registration process. Many times we have two or three organisations duplicating research. The Council is the only one of these bodies able to confer meaningful legal protection. It is critical that it takes the recognition from these other organisations seriously and incorporates this acknowledgement within its formal systems for Heritage protection.

7) Heritage Area

We support the use of heritage areas, and again advocate for the Eva/Dixon St area to be acknowledged as such. This area has the oldest wooden building in the CBD and an excellent example of adaptive reuse of a heritage building (i.e. the Hannah Factory).

We consider that a broader notion of heritage be adopted by the council. In addition to omissions in certain areas of architecture (e.g. industrial buildings, modernism, blocks of flats, etc.), the Architectural Centre considers that spaces and spatial practices are worthy of listing. We believe the use of "heritage area" to acknowledge both built objects and the spatial relationship between this is a productive designation. In particular we are concerned that the scalar and spatial relationships in Te Aro are important heritage items which are currently under threat because of the mode and speed of multi-storey development in Te Aro. The new regime of increased height (even when compliant with the Central Area Rules) is radically changing the heritage character of Te Aro, and not often in a positive sense. We are especially concerned about the potential extinction of pedestrian-scaled spaces, and the threat to the permeable environments (very typical of Te Aro), which support pedestrian thoroughfare and safety. We recommend that the council map and protect to retain these urban routes, and implement council by-laws which borrow from English rambling laws (e.g. Countryside and Rights of Way Act 2000) in order to preserve this aspect of the special character of Te Aro.

8) To Paint or Not to Paint

The surface treatment of many buildings is important to their architectural coherence. The raw unpainted concrete of Brutalist buildings is integral to their architecture, and it is critical that such buildings remain without being painted. The Architectural Centre strongly recommends that where appropriate the unpainted state of a building must be explicitly protected in the District Plan. Recently several buildings in Wellington have been compromised (e.g. Archives New Zealand, and Investment House) because of unintelligent relationships formed with paint.

9) Contemporary Heritage and Site-Specific Sculpture

Heritage is not restricted to the historic. There are important contributions to Wellington's heritage which are recent additions to the city. The Architectural Centre believes that it is important that excellent contemporary heritage is recognised and listed in the District Plan, and we consider that the Kelly-Clifford House and the Changing Sheds and Groyne, Oriental Beach ought to be included in the Heritage Schedule.

10) Negative Heritage

In the reply from the council regarding your submission on DPC 53 it was noted that as the council has a system for removing buildings from the Heritage List there was no need for the concept of Negative Heritage. Two points are needed to be made here. Firstly to take a building off the Heritage Schedule is to demonstrate the Council's inability to protect the City's Heritage and is an appalling concept. Secondly there appears to be a misunderstanding of our concept of Negative Heritage. This is to acknowledge that - despite council procedures - buildings are built in Wellington that do not contribute positively to the city in any public sense. We believe there should be incentives for these buildings to be removed and replaced by more publicly productive architecture.

Summary

We reiterate our support for the protection of our built heritage, and our enthusiasm for this to enrich and raise the quality of Wellington's built environment. If you have any queries rising from our submission please do not hesitate to contact me.

Yours sincerely

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President
The Architectural Centre