



10 May 2018

File ref: 12015-214

Christine McCarthy and Daryl Cockburn  
Co-Presidents  
Architectural Centre Inc.  
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Dear Christine and Daryl

**PROPOSED ENTRY OF WELLINGTON TEACHERS' TRAINING COLLEGE (FORMER), WELLINGTON ON THE NEW ZEALAND HERITAGE LIST (LIST NO.9797)**

Further to our letter of 26 April 2018 acknowledging your supportive submission on the proposed New Zealand Heritage List/Rārangi Kōrero ('the List') entry of Wellington Teachers' Training College (Former), we are now in a position to respond to your submission in more detail.

Below you will find we have responded to the points in your submission where issues were raised, maintaining the same numbering as your submission for ease of cross-reference.

1. As noted previously, Heritage New Zealand is pleased the Architectural Centre Inc. supports the proposed List entry of Wellington Teachers' Training College (Former). You correctly note the provision in the Heritage New Zealand Pouhere Taonga Act 2014 (the Act) giving Heritage New Zealand ability to nominate places for List entry. A subsequent clause (s70(1)) goes onto stipulate that any internal/Heritage New Zealand nomination is required to go through an independent review by at least one independent assessor. While internal nominations do occur, external nominations are an integral part of connecting with public, collaborating with individuals and groups, and creating broader support for heritage conservation. Furthermore, an independent assessor incurs costs and these are first weighed and prioritised against Heritage New Zealand's other budgetary considerations.

In specific reference to Wellington Teachers' Training College (Former), for some time there had been indications from members of Wellington's heritage advocacy community that an external nomination would be forthcoming. This did not eventuate and Heritage New Zealand was considering nominating this place for inclusion on the List when the two external nominations were received in April 2017.

Additionally, I'll just note that Heritage New Zealand was aware of the heritage values of the campus prior to its nomination and the lack of a nomination did not preclude us from being involved in advocacy work, albeit out of the public eye.

2. In relation to the Wellington City Council's (WCC) request on 13 March 2018 that Heritage New Zealand suspend the List entry process, you have interpreted the various clauses in the Act in a manner consistent with Heritage New Zealand's responses to WCC during subsequent consultation. As you are aware, Heritage New Zealand acceded to a request to extend the submissions/public notification period, in accordance with the Act (s69(2)(b)). However, this did not constitute a 'suspension' of our List entry process and Heritage New Zealand has conveyed to the WCC that it cannot formally 'suspend' the process.

We have also made our position clear to WCC that List entry and planning for the site's future are distinct processes. The purpose of List entry is to identify and recognise heritage values, from which discussions about the practicalities of protecting and conserving those values can stem. Heritage New Zealand has also expressed the importance of it being one of the parties involved in the proposed 'masterplan' exercise, will continue to advocate for this inclusion, and plans to participate fully in that process.

3. The above response also relates in part to your next submission point, regarding proactively advocating for the campus' adaptive re-use. It is worth reiterating that Heritage New Zealand is intent on exploring the practicalities of protecting and conserving the heritage values of Wellington Teachers' Training College (Former) with WCC and the owner. We have advocated for adaptive re-use from the outset of our discussions with these parties.

It is our standard practice to advocate for all List entries to be represented in the applicable District Plan Heritage Schedule. This is a criterion for WCC's Built Heritage Incentive Fund and we would support any application the owners made to that fund, in addition to other funds for which List entry is a base criterion, such as Heritage New Zealand's National Heritage Preservation Incentive Fund and Heritage EQUIP. Other measures you've suggested, such as temporary rates relief, are all measures Heritage New Zealand is happy to advocate for as part of the proposed masterplan process, but the decision to grant such relief rests solely in the WCC.

4. Heritage New Zealand also supports the idea of establishing a design competition, as you have suggested, because it is a way to explore the campus' adaptive re-use. We are prepared to canvas this option with WCC, but we believe to be useful it would also require owner buy-in.
5. Rectifying what the Architectural Centre Inc. perceives as the underrepresentation of mid to late century buildings on the List is also something Heritage New Zealand is considering, along with other forms of heritage and regions which merit further attention. However, such projects still need to be undertaken within the framework of Heritage New Zealand's strategic objectives and policies. This point was discussed in our previous List entry review correspondence with you (dated 18 January 2018) regarding the Ashleigh Court (List No.1335).

I would like to highlight that this year Karen Astwood (Heritage New Zealand Central Region, Area Manager/Heritage Assessment Advisor) and Christine have conversed and corresponded about establishing an expert group to gather information and create a list of mid to late twentieth century places that various organisations, such as Architectural Centre Inc., DOCOMOMO New Zealand and the New Zealand Institute of Architects, agree should be prioritised for List entry and phased into our future work programming. This proactive approach is one we are looking forward to continuing to working with you on.

6. In this submission point you noted several areas where you thought Heritage New Zealand could devote resources to ensure the wider government sector recognises and values the historic heritage in its ownership/management/administration and that they are then appropriately looked after.

We anticipate the project outlined above (item 5) would also include significant examples of modernist buildings and structures which were created by/for the Crown/New Zealand's government sector and those still in its stewardship. This project could also be an excellent opportunity for the type of public education about modern architecture, so it is valued and

conserved/protected appropriately into the future, you have advocated for later in submission point 6.

We can also assure you that Heritage New Zealand and the Ministry for Culture and Heritage are currently working closely together to explore options to improve the survival rates of New Zealand's cultural heritage, including government-owned heritage.

7. Heritage New Zealand has not pursued the Notice of Requirement for a Heritage Order which you have asked for. We are currently seeking advice from the Ministry for Culture and Heritage and our Board to gain clarity about the circumstances they believe would justify a Heritage Order. We note you do not suggest the Heritage Order be in place in perpetuity, but only until Wellington Teachers' Training College (Former) is entered into WCC's District Plan Heritage Schedule or it is no longer essential for the Heritage Order to remain. As mentioned earlier, it is standard practice for Heritage New Zealand to advocate for Listed places to be scheduled in the District Plan.

You also comment on the removal of the function of interim registration from the Heritage New Zealand Pouhere Taonga Act. While it was true that interim registration under the Historic Places Act 1993 provided the same level of protection as a Notice of Requirement for a Heritage Order under the RMA, it is worth noting that this protection only existed until the registration/listing process was completed, after which the protection status lapsed.

We have already thanked you for your careful reading of the report and excellent comments and editorial feedback. As mentioned in our earlier correspondence, your contribution to the report's content has ensured the best information will be presented to Heritage New Zealand's Board, and we have amended the report accordingly. Among the suggestions you also raised a few other issues about our report writing process which I'll just address.

10. As part of our assessment process, Ako Pai marae and its potential significance within the campus was discussed with Tira (Māori Heritage Team) staff. As mentioned in the report and your submission, historically it was an important asset in the campus' cultural and social life. However, as also discussed in the report, Ako Pai marae's kaupapa, mauri and carved features were all removed from the building when Victoria University of Wellington's School of Education relocated. Therefore, we felt it was important to acknowledge Ako Pai marae's contribution in the report, but, given the word limits we have in place for our reports, it was not necessary to go into further detail as the report necessarily needs to focus on supporting the significance assessment.
- 15-16. Thank you for highlighting the inaccurate use of the term 'definitive survey' in relation to Julia Gatley's edited work, *Long Live the Modern*. This was an oversight which has been corrected, as has the suggestion that inclusion or, more specifically, exclusion from the book is representative of levels of architectural significance.

Your critique of Heritage New Zealand's apparent reliance on *Long Live the Modern* shows a lack of appreciation of the process we have gone through to create this assessment. The purpose of our reports is to provide sufficient information to support the case for List entry - they do not pretend to be conclusive accounts of a place or comprehensive literature reviews. To approve a proposed List entry for public notification our internal peer review committees need to be satisfied the assessment has made the case for List entry. We then view the submission process as an opportunity to hear from experts in the field and to enhance the information further.

I'm sure you'll appreciate that, like academia, it is our standard practice to only include references to directly applicable and up-to-date sources. Our deliberately brief 'further reading' section is in no way indicative of the full range of sources consulted during the research. Neither are the footnotes, which are only references to specific pieces of information.

I'd like to once again thank you very much for your involvement in the List entry process. We'll send you a copy of the revised report once it has been finalised.

The Board will consider the proposal to enter Wellington Teachers' Training College (Former) on the List, along with all the submissions, at their meeting on 28 June 2018. The Board will decide whether or not to confirm the proposed List entry and we will write to advise you of their decision following the meeting.

Yours sincerely



Jamie Jacobs  
Director Central Region

*cc. Manager Heritage Listing, Heritage New Zealand*