

12 June 2018

Andrew Coleman
Chief Executive
Heritage New Zealand Pouhere Taonga
PO Box 2629
Wellington 6140

Re: Friday 4 May 2018 meeting

Kia ora Andrew

We are writing to follow up on the meeting the Architectural Centre had with you and Jamie Jacobs on Friday 4 May 2018 following your request to meet with us. We make the following points:

1. We expressed our ongoing frustration with, and perception of, Heritage New Zealand Pouhere Taonga's ineffectiveness in protecting heritage. We find this to be true especially (but not exclusively) in relation to modernist and post-war architectural heritage. Our perception at the meeting was that our past experience with HNZ was not of interest to you. This concerns us, as, given your stated desire to change the past record of HNZ, we consider that meaningful change will require learning about this past record and genuinely listening to community groups.
2. We acknowledge that HNZ sees the retention of the Wellington Teachers Training College (Former) buildings at Karori as the desired outcome for that site, and like the Architectural Centre, considers adaptive re-use to be a viable option, while acknowledging that this is not Ryman's preferred option because of their well-established business model and consequential building design. If the key aspects of the Wellington Teachers Training College (Former) are to be maintained Ryman may need adopt a new operating model.
3. We note our concern regarding HNZ's preferred approach with respect to Ryman Healthcare. Ryman have made it very clear that they intend to demolish at least half of the buildings on the Wellington Teachers Training College (Former) site. They reinforced this at the community days held at Karori in early May. HNZ's strategy to only "have conversations," appears to us to be a very dangerous one if protecting the now precarious heritage values of the site are of prime concern. This does not appear to us to signal any significant change from HNZ's past approach to developer-owned sites. This is especially concerning for us given it is in Ryman's best interests to have HNZ on their side and reassured about their proposals.
4. In advocating for HNZ to lodge a notice of requirement (NoR) for a heritage order, the Architectural Centre is not advocating that HNZ stop "having conversations" with Ryman, as we see engaging with Ryman as critical for a



the architectural centre inc.
PO Box 24178 Wellington

successful outcome on the site. Lodging a NoR does not preclude dialogue, but - we believe - will positively influence the heritage outcome of these discussions.

5. The intended Ryman demolition will adversely impact on the appearance of building masses, remove the idiosyncratic sky bridges, the spatial form of the integrated landscaping of Lopdell Gardens, and the innovative structural design expressed in the Gymnasium Building. Additionally, the proposed creation of secure compounds (gated-community), which will fence and divide the site, will radically interfere with the heritage values of the site.
6. We were also concerned regarding your persistent reference to the Heritage Hub in Invercargill as a valid comparison with the Karori situation. Given the weight you placed on this example we contacted the Invercargill City Council to ensure we had the facts correct. The Invercargill site has 18 DP-listed heritage buildings in the HWCP Management Ltd-owned property, of which three of these have an HNZ listing, namely:
 - (a) Southland Times Building (1907-1908) (Category 2 2513),
 - (b) Bank of New South Wales (1904) (Category 1 2443),
 - (c) Newburgh Building (Former) [a.k.a. Government Life Insurance Building] (1928), (Category 2 2470)
7. While according to the council the plans are not definite, the developer has publicly indicated that the Bank of New South Wales is the only heritage building which will be retained,¹ and the council has indicated that the other buildings listed on the DP are considered to be of local significance, with the DP only requiring facades to be kept. Stronger protection is given to the Heritage NZ listed buildings.
8. We see the following as key differences between the Invercargill and the Karori sites, suggesting that a different approach from HNZ with respect to Karori is necessary:
 - (a) there are 18 DP-listed heritage buildings in Invercargill site, none of the Karori buildings have any heritage protection
 - (b) the Invercargill heritage buildings date from the early twentieth-century, which, in contrast to modernist, especially Brutalist, architecture (such as at Karori), is significantly easier to rouse public support for.
 - (c) the DP heritage-listings mean that the heritage values of the Invercargill buildings are subject to RMA processes, and given their number, and the location and size of the site - in the middle of downtown Invercargill, the development is highly likely to be publicly notified, giving heritage organisations and other community groups a public voice, and hence an impetus for the developer to listen and respond to concerns raised. This is in complete contrast to the Karori situation where, because of the lack of legal protection, there will be no opportunity for the public to submit on the proposed demolition of the Stage II buildings. Any resource consent hearings that occur will relate to the design and construction of the retirement home buildings, and issues pertaining to the heritage of buildings to be demolished - which be outside of the scope of the resource consent - will not be able to be taken into account in any decision.
9. These reasons indicate to us of the irrelevance of the Invercargill comparison and the vital need for meaningful protection to be given to the Wellington Teachers Training College (Former) through the mechanism of a Heritage

¹ "Preliminary inner city plans revealed" *Southland Express* (15 March 2018)
<http://www.southlandexpress.co.nz/featured-stories/preliminary-inner-city-plans-revealed/>

Order. The Architectural Centre consequently continues to believe that the legal mechanism of a Heritage Order is the only option to ensure a good outcome on the site, and again we stress to you the importance of HNZ taking this step.

10. We also acknowledge that HNZ is:
 - (a) supportive of our suggestion that the RMA should be amended such that heritage recognised through the New Zealand Heritage List/Rārangi Kōrero is treated as if listed on the relevant district plan.
 - (b) willing to support community groups applying to the Ministry for the Environment's Environmental Legal Assistance Fund with the aim of participating in heritage protection, for example by way of writing letters of support, and discussing potential collaboration in court cases.

11. We also note your indication that HNZ is looking at establishing a forum of community groups, which the Architectural Centre will be invited to be involved in.

Yours faithfully



Christine McCarthy, co-president & Kate Linzey, committee member
Architectural Centre

cc. Jamie Jacobs jjacobs@heritage.org.nz

cc. Nicola Jackson njackson@heritage.org.nz; NatHerPolManager@heritage.org.nz