

21 February 2018

Mayor and Councillors  
Wellington City Council  
P.O. Box 2199  
Wellington 6140  
mayor@wcc.govt.nz  
councillors@wcc.govt.nz

Dear Mayor and Councillors

1. We refer to our letter of 13 March 2017 regarding Karori Teachers College (<http://architecture.org.nz/wp-content/uploads/2013/06/AC-letter-to-WCC-re-Karori-Teachers-College.pdf>), and note the following:
  - (a) the site of the former Wellington Teachers College in Karori has been sold prior to Christmas to Rymans Healthcare. We understand that as a council you are familiar with the ownership history of the site, including its transfer for \$10 from the Ministry of Education to Victoria University on the understanding that the site would be utilised by the university for educational purposes for the then foreseeable future/long term.
  - (b) the site is not protected by the Wellington City Council District Plan. It is also not yet listed by Heritage New Zealand. Consequently the site is particularly vulnerable to insensitive redevelopment which would adversely impact on the well-recognised heritage values of the site.
  - (c) the WCC has a legal obligation under the Wellington Regional Policy Statement (within the Resource Management Act (RMA) framework) to identify sites with significant historic heritage values. The relevant RPS policy is Policy 21, which reads as follows:

District and regional plans shall identify places, sites and areas with significant historic heritage values that contribute to an understanding and appreciation of history and culture under one or more of the following criteria:

    - (a) historic values: these relate to the history of a place and how it demonstrates important historical themes, events, people or experiences.
      - (i) themes: the place is associated with important themes in history or patterns of development.
      - (ii) events: the place has an association with an important event or events in local, regional or national history.
      - (iii) people: the place is associated with the life or works of an individual, group or organisation that has made a significant contribution to the district, region or nation.
      - (iv) social: the place is associated with everyday experiences from the past and contributes to our understanding of the culture and life of the district, region or nation.



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- (b) physical values: these values relate to the physical evidence present.
  - (i) archaeological: there is potential for archaeological investigation to contribute new or important information about the human history of the district, region or nation.
  - (ii) architectural: the place is notable for its style, design, form, scale, materials, ornamentation, period, craftsmanship or other architectural values.
  - (iii) technological: the place provides evidence of the history of technological development or demonstrates innovation or important methods of construction or design.
  - (iv) integrity: the significant physical values of the place have been largely unmodified.
  - (iv) age: the place is particularly old in the context of human occupation of the Wellington region.
  - (v) group or townscape values: the place is strongly associated with other natural or cultural features in the landscape or townscape, and/or contributes to the heritage values of a wider townscape or landscape setting, and/or it is a landmark.
  
- (c) social values: these values relate to the meanings that a place has for a particular community or communities.
  - (i) sentiment: the place has strong or special associations with a particular cultural group or community for spiritual, political, social, religious, ethnic, national, symbolic or commemorative reasons.
  - (ii) recognition: the place is held in high public esteem for its historic heritage values, or its contribution to the sense of identity of a community, to the extent that if it was damaged or destroyed it would cause a sense of loss.
  
- (d) tangata whenua values: the place is sacred or important to Māori for spiritual, cultural or historical reasons.
  
- (e) surroundings: the setting or context of the place contributes to an appreciation and understanding of its character, history and/or development.
  
- (f) rarity: the place is unique or rare within the district or region.
  
- (g) representativeness: the place is a good example of its type or era.

2. We believe that the former Wellington Teachers' College, Karori meets the RPS Policy 21 criteria because of the following:

- (a) the site (buildings and landscape) has high architectural values due to the accomplished nature of its design. It has been recognised as such by numerous awards including from the New Zealand Institute of Architects
- (b) the design is a significant work of a nationally-recognised architect: S. William Toomath (1925-2014)
- (c) the site and institution is associated with many important New Zealanders. For example, in addition to its architect, arts educator and potter, Doreen Blumhardt ONZ DNZM CBE (1914-2009) is strongly associated with the place.
- (d) the site is significant for many of the Teachers College community. It also has high community values for the Karori community because of the close relation of the facility to the suburb, including community use of the

outdoor courts and indoor recreation facilities, demonstrated by the formation of Save the Karori Campus Group.

- (e) the site currently has high levels of integrity because of its retention as an educational institution for most of its existence, and only minor changes to the buildings.
  - (f) the site is a good example of its type or era, being an exemplary example of 1970s Brutalism. Its inclusion in the current Deutches Architektur Museum, Frankfurt *SOS Brutalism* exhibition (9 November 2017-2 April 2018) is an example of the recognition of its quality.
3. Consequently we consider that the former Wellington Teachers' College, Karori meets the RPS criteria and must be identified and protected by the WCC.
  4. We acknowledge that the cost and resources that undertaking a District Plan Change in order to list a single historic heritage site may not be reasonable, due to the costs to rate payers and the use of council staff time and council resources.
  5. We do note however that the WCC is a Heritage Protection Authority (HPA) under the RMA (s187(b)) and has the authority to give notice of a requirement for a Heritage Order by filling a 1-2 page form (Resource Management (Forms, Fees and Procedure) Regulations 2003 (Form 26)), which would immediately give the site protection and could be removed once the site was properly listed on the District Plan (ss 194,196).
  6. We strongly urge you to give notice of a requirement for a Heritage Order. This is a mechanism which parallels the designation process for the reservation of land for infrastructure provision. It was intended to be used in such a fashion. We would not see NZTA hesitate to reserve land for road-building purposes when it is needed, and it is appropriate for you, as a HPA, to reserve land for heritage protection purposes.
  7. We consider that making use of HPOs as interim measures until historic heritage sites are properly listed is an appropriate and proper use of the power vested in you as an HPA. It is a practical and efficient way to ensure the protection of our historic heritage, and it is a way to ensure that long term that Wellington remains a capital of culture.

Yours faithfully

  
Christine McCarthy and Daryl Cockburn  
Co-presidents, Architectural Centre  
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cc Hon. Grant Robertson, Wellington Central MP  
cc Rt Hon. Jacinda Ardern, Minister for Arts, Culture and Heritage  
cc Hon. Eugenie Sage, Minister for Conservation  
cc Hon. Chris Hipkins, Minister of Education  
cc Hon. David Parker, Minister for the Environment  
cc Amanda Mulligan, Senior Heritage Advisor, Wellington City Council