



the architectural centre inc.
PO Box 24178 Wellington

27 July 2018

Rt. Hon. Wyatt Creech
Chair of the Board
Heritage New Zealand Board
P.O. Box 2629
Wellington 6140
information@heritage.org.nz

Re: Heritage Order to protect Wellington Teachers' Training College (Former)

Dear Rt Hon. Wyatt Creech

We are writing to follow up on our earlier letter of 14 June 2018 regarding our concern at the apparent lack of action by Heritage NZ in protecting the Wellington Teachers' Training College (Former). We make the following points:

1. Heritage NZ has statutory functions under the Heritage New Zealand Pouhere Taonga Act (2014) to: "*identify, record, investigate, assess, list, protect, and conserve historic places*" and "*to act as a heritage protection authority under Part 8 of the Resource Management Act 1991*" (NZHPTA ss13(1)(a), 13(1)(i).
2. These functions are given to Heritage NZ in order to achieve the purpose of the Act which is "*to promote the identification, protection, preservation, and conservation of the historical and cultural heritage of New Zealand*" (NZHPTA s3)
3. The Wellington Teachers' Training College (Former) has recently been recognised by Heritage NZ in the Category 1 list entry (no. 9797) as having "*historic significance,*" "*aesthetic importance,*" "*outstanding architectural significance,*" "*exceptional design and execution,*" and "*[a]s a distinct educational precinct embodying the vision of a single designer, little altered over time, its cohesiveness and authenticity has special significance nationally.*" We commend Heritage NZ for this recognition.
4. In recognising the WTTC(F) as a Category 1 historic place, Heritage NZ recognises that the Wellington Teachers' Training College (Former) is a place "*of special or outstanding historical or cultural heritage significance or value.*" (HNZPTA s65(4)(i)).
5. The WTTC(F) is currently under threat. Approximately 50% of the buildings have been identified by Ryman Healthcare to be demolished as per the Certificate of Compliance issued by the WCC. Significant parts of the grounds are likely to be built over threatening the authenticity of "*sensitive response to its site*" identified in the HNZ listing of the site.
6. Because the WTTC(F) has, and had, no District Plan protection at the time Ryman applied for a Certificate of Compliance, Ryman have an absolute right to

demolish 50% of the buildings for the next 5 years. The lack of DP protection means that the remainder of the WTTC(F) site is also vulnerable. We note that under RMA s104 (regarding resource consents), decision-makers are not required to have regard for a Heritage NZ listing (c.f. RMA s74(2)(b)(iia)), though there is discretion for a decision-maker to consider this under RMA s104(1)(c), and a listing might inform a Part 2 assessment (s6(f)).

7. Any potential consideration of heritage in a future resource consent cannot prevent the demolition of the 50% of the WTTC(F) that is subject to the Certificate of Compliance - because demolition has already been granted. The heritage value of the site is also unlikely to be a significant factor to be considered for the remainder of the site, given the lack of a District Plan listing, and because demolition is currently a permitted activity.
8. A District Plan change is highly unlikely prior to Ryman lodging an application for a resource consent in the next 2-3 months.
9. Because of the above we consider that a heritage order is the only legal recourse to ensure protection of this Category 1 site. We consider it to be Heritage NZ's moral and legal duty to protect the Wellington Teachers Training College (Former) by lodging a notice of requirement for a heritage order for the Wellington Teachers Training College (Former).
10. We continue to strongly urge you to do this.

Yours faithfully



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- cc. Hon. Grant Robertson, MP for Wellington Central
- cc. Richard Bentley, Save the Karori Campus Group
- cc. Katherine Skipper, President, NZIA Wellington Branch
- cc. Ric Slessor, Wellington Councillor, NZIA
- cc. Philip Hartley, Chair, Docomomo NZ
- cc. Ian Bowman, Chair, ICOMOS NZ
- cc. Diane Calvert, Wellington City Councillor (Onslow-Western Ward)
- cc. Andy Foster, Wellington City Councillor (Onslow-Western Ward)
- cc. Simon Woolf, Wellington City Councillor (Onslow-Western Ward)
- cc. Priscilla Williams, Chair, Historic Places Wellington
- cc. James Blackburne, Chair, Historic Places Aotearoa
- cc. Dame Anne Salmond, Patron, Historic Places Aotearoa