



the architectural centre inc.  
PO Box 24178 Wellington

4 September 2018

Parliamentary Commissioner for the Environment  
P.O. Box 10-241  
Wellington 6143  
New Zealand  
pce@pce.parliament.nz

Re: Heritage New Zealand's action/inaction regarding protecting Category I site the Wellington Teachers Training College (Former), Karori

Tēnā koe Commissioner

1. We write to request an investigation into whether or not Heritage NZ (HNZ) has failed to fulfil its function with respect to the former Wellington Teachers Training College, Karori (W TTC), to:<sup>1</sup>
  - (a) protect historic places
  - (b) advocate the protection of historic places, and
  - (c) act as a heritage protection authority for the purposes of protecting historic places
2. We understand that your functions include:<sup>2</sup>
  - (a) investigating the effectiveness of environmental planning and management by public authorities.
  - (b) investigating any matter where the environment may be ... adversely affected.
  - (c) encouraging preventive measures and remedial actions to protect the environment.
3. We note that you are required to have regard to "structures of aesthetic, archaeological, cultural, historical, recreational, scenic, and scientific value" and "the effects on communities of people of actual or proposed changes to natural and physical resources."<sup>3</sup> W TTC falls within that rubric as it is a Category I historic place, and a resource that is currently used by the Karori community for sports and recreation.

**Heritage value of W TTC**
4. W TTC has long been recognised as a site of heritage significance. It was one of the sites that we encouraged the WCC to protect by a heritage listing in the Wellington District Plan over 10 years ago. It is possible that the lack of any heritage protection for W TTC under the District Plan is due to a misguided perception that heritage buildings under government ownership are not vulnerable to demolition.
5. As documented in the timeline we have compiled below, the site was in Ministry of Education ownership and then, up until recent times, that of Victoria

<sup>1</sup> Heritage New Zealand Act 2014, ss13(1)(a), 13(1)(c), and 13(1)(i).

<sup>2</sup> Environment Act 1986, ss16(1)(b), 16(1)(c)(i), and 16(1)(g).

<sup>3</sup> Environment Act 1986, ss17(b) and 17(d)(i).

University. During this time neither HNZ or WCC protected the heritage site. The WTTC is now owned by Ryman Healthcare and, while now formally recognised as having heritage significance by HNZ, it remains without any protection from demolition.

6. A significant part (about 50%) of WTTC is on the verge of being demolished. We understand that commencement of demolition of parts of some of the interiors will occur in the next month. Ryman applied to WCC for a building consent on 21 August 2018, which will be granted in approximately 20 working days, to demolish half of the buildings on the site. Because of the lack of heritage protection there is no requirement for a resource consent for this work. The buildings to be demolished include the iconic skybridges which connect the two stages of building, buildings which create and frame Lopdell gardens, and the structurally-innovative gymnasium. More importantly, the site has been comprehensively designed, meaning that proposed demolition will compromise an understanding of the design of the site as a whole.
7. Importantly WTTC is one of the few modernist campuses in New Zealand with formal heritage recognition. There appears to be a bias in heritage protection towards nineteenth- and early twentieth-century historic heritage. If we do not protect modernist heritage now, little of it will remain for the future. Additionally, in cases such as the WTTC, the buildings are well built, and there are significant amounts of embodied carbon in the buildings. Demolishing these buildings is counter to effective sustainable management of our environment.
8. We note that we are very supportive of adaptive reuse of the buildings on both heritage and sustainability grounds, and we are not advocating a "frozen-in-time" approach to heritage sites.

#### **Why a heritage order is necessary for WTTC**

9. We are particularly concerned with HNZ's apparent refusal to lodge a notice of requirement for a heritage order to ensure the protection of this Category I Historic Place.<sup>4</sup> HNZ is New Zealand's leading historic heritage agency, and statutorily charged with acting "as a heritage authority ... for the purposes of protecting - the whole or part of a historic place."<sup>5</sup> A heritage order is now the only legal mechanism available as a preventative measure to protect this heritage site. We therefore consider HNZ should make a heritage order in this instance.
10. Lodging a notice of requirement for a heritage order is appropriate because:
  - (a) WTTC is a significant heritage site
  - (b) the threat of demolition is real, and
  - (c) a heritage order will create time for HNZ and Ryman to develop a proposal for the site which sensitively adapts it for re-use.
11. We consider that heritage orders have two primary purposes:
  - (a) to reserve land for heritage purposes (akin to a road reserve), and
  - (b) to be a stop gap measure when unanticipated situations, such as that of WTTC, occur.

The fact that a heritage order supersedes any existing provisions of a planning document or resource consent suggests to us that heritage orders were designed for this very situation. This could be lodged as a temporary or

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<sup>4</sup> Heritage orders are governed by ss187-198 of the Resource Management Act 1991.

<sup>5</sup> Heritage New Zealand Act, s13(1)(i)(i).

permanent mechanism to ensure positive heritage outcomes are achieved in any new development, as well as protecting the current amenity value of the site for the community.

12. The purpose of a heritage order is to protect "any place of special interest, character, intrinsic or amenity or visual appeal."<sup>6</sup> As a Category I historic place, WTTC is a place "of special or outstanding historical or cultural heritage significance or value."<sup>7</sup> There is no doubt that WTTC is in need of protection now if its demolition is to be prevented.
13. In light of the above, we request that an investigation into HNZ's approach to protecting WTTC be initiated under urgency, with a view to making a heritage order under the Resource Management Act 1991, to ensure it continues to be part of our built heritage in years to come.
14. Below is a summary timeline of events relevant to the WTTC.

Nāku iti noa, nā



Christine McCarthy  
President, Architectural Centre

### WTTC Timeline

**5 September 2007:** The Architectural Centre asks the WCC to list WTTC site on the DP heritage schedule in their District Plan Change 58 submission.<sup>8</sup>

**2015:** The Ministry of Education transfers the ownership of WTTC to VUW for \$10.<sup>9</sup>

**August 2016:** VUW declares WTTC surplus to university requirements.<sup>10</sup>

**March 2017:** HNZ and VUW are in discussions regarding a heritage covenant over the WTTC site (announced by VUW VC in public meeting 6 March 2017)

**August 2017:** VUW begins process to sell WTTC on open market.<sup>11</sup>

**December 2017:** VUW sells WTTC to Ryman Healthcare for \$28 million.<sup>12</sup>

<sup>6</sup> Resource Management Act 1991, s189(1)(a).

<sup>7</sup> Heritage New Zealand Act s65(4)(a)(i).

<sup>8</sup> Architectural Centre "Re: DPC 58 Proposed Additional Heritage Listings" (5 September 2007) <http://architecture.org.nz/wp-content/uploads/2013/06/DPC-58-Proposed-Additions-to-Heritage-Listings.pdf>

<sup>9</sup> Cook, Frances "Victoria University sells controversial Karori campus to Ryman Healthcare" *New Zealand Herald* (12 December 2017)

[https://www.nzherald.co.nz/business/news/article.cfm?c\\_id=3&objectid=11957958](https://www.nzherald.co.nz/business/news/article.cfm?c_id=3&objectid=11957958); Hunt, Tom "Whistleblower claims Victoria had plans to sell Karori campus before taking over title" *Stuff* (28 November 2017)

<https://www.stuff.co.nz/national/education/99202196/Whistleblower-claims-Victoria-had-plans-to-sell-Karori-campus-before-taking-over-title>

<sup>10</sup> "VUW sells its Karori campus to Ryman, for a retirement village" *Wellington Scoop* (12 December 2017) <http://wellington.scoop.co.nz/?p=105716>

<sup>11</sup> Dooney, Laura "Victoria University to put Karori campus land and buildings on open market" *Stuff* (7 August 2017) <https://www.stuff.co.nz/national/education/95523814/Victoria-University-to-put-Karori-campus-land-and-buildings-on-open-market>

<sup>12</sup> "VUW sells former Karori campus" *VUW* (12 December 2017)

<https://www.victoria.ac.nz/news/2017/12/victoria-university-sells-former-karori-campus>; Rutherford, Hamish "Ryman Healthcare paid \$28m for Victoria University's Karori Campus" *Stuff* (30 July 2018)

**13 February 2018:** HNZ publicly notifies an intention to list WTTC. Public submissions are due 23 March 2018 (HNZ letter to Architectural Centre).

**19 March 2018:** Ryman Healthcare requests HNZ to extend the period for public submissions on the proposed WTTC listing for a further 20 working days.<sup>13</sup>

**21 March 2018:** HNZ publicly notifies an extension of time until 24 April 2018 (HNZ letter to Architectural Centre). This means that a decision on the listing by HNZ cannot occur until after the period for public submissions ends.

**April 2018:** Ryman Healthcare requests a certificate of compliance, under RMA s139, from WCC to demolish approximately half the buildings on the WTTC site.<sup>14</sup>

**1 May 2018:** WCC issues a certificate of compliance to Ryman's to demolish approximately half the buildings on the WTTC site.

**18 July 2018:** HNZ lists WTTC as a Category I Historic Place.<sup>15</sup>

**21 August 2018:** Ryman Healthcare submits a building consent application to demolish approximately half the buildings on the WTTC site. Confirmation of formal lodgement is pending.

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<https://www.stuff.co.nz/business/105870509/Ryman-Healthcare-paid-28m-for-Victoria-Universitys-Karori-Campus>

<sup>13</sup> Hunt, Tom and Collette Devlin "Wrecking ball looms for much of Wellington's Karori Campus" (10 April 2018) <https://www.stuff.co.nz/business/102982269/wrecking-ball-looms-for-much-of-wellingtons-karori-campus>

<sup>14</sup> Hunt, Tom and Collette Devlin "Wrecking ball looms for much of Wellington's Karori Campus" (10 April 2018) <https://www.stuff.co.nz/business/102982269/wrecking-ball-looms-for-much-of-wellingtons-karori-campus>

<sup>15</sup> HNZ "Wellington Teachers' Training College (Former) [List entry no. 9797]" (18 July 2018) <http://www.heritage.org.nz/the-list/details/9797>