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Tēnā korua Mayor and Chief Executive

We are writing to you, in the context of continuing developments concerning the former Wellington Teachers Training College at Karori (W TTC).

As you will be aware this is an historic place recognised by Heritage New Zealand with a Category I listing (No. 9797). It was also one of two New Zealand sites exhibited at the international exhibition of Brutalist architecture (*SOS Brutalism*) at the German Museum of Architecture earlier this year. The quality of the site's design was also recognised when the first stage of the Teachers' Training College was completed in 1972.

We are very concerned that a significant part of this important modernist site will be demolished. This is because:

- (a) the whole of the site has no heritage protection under the District Plan.
- (b) demolition of the buildings is a permitted activity under the District Plan.
- (c) Ryman Healthcare have a Certificate of Compliance (RMA s139) allowing them to demolish half the buildings on the site as of right for the next 5 years (RMA s139(12) i.e. s125), regardless of any change to the District Plan, including heritage listing.
- (d) the Heritage NZ listing provides no protection, and even if it did, this was determined after Ryman applied for a Certificate of Compliance.
- (e) any decision on an application for a resource consent to build on the site (which Ryman have previously indicated is likely in the next 2-3 months) will not take heritage issues into account because it will assess the new development, not whether or not the demolition of these buildings should occur (because demolition is a permitted activity).
- (f) Ryman have a successful business model which produces a particular type of architecture and architectural process that do not typically include adaptive re-use of heritage buildings.
- (g) Ryman have recently (21 August 2018) applied to WCC for a building consent to demolish approximately half of the buildings on the site.



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There is a bias towards nineteenth- and early twentieth-century historic heritage in heritage protection. If we do not protect modernist heritage now, little of it will remain for the future. Additionally, in cases such as the Karori campus, 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. We consider that the quality, condition and design of these buildings make them ideal candidates for adaptive re-use. We consider the Karori site to have the qualities which would support new thinking about accommodating older people (i.e. mixed use development, mixed-tenure and occupant demographics, and strong connections to the community), rather than late twentieth-century models.

Because of the lack of protection over this important site, we ask you to lodge a notice of requirement for a heritage order over the site under RMA s189A.

The reasons why we are asking you to do this is:

- (a) we believe that the site warrants and needs heritage protection.
- (b) in NZ the instruments available to protect heritage sites are:
 - (i) listing in the relevant District Plan
 - (ii) a heritage covenant
 - (iii) a heritage order
- (c) we understand that the current owner (Ryman Healthcare) strongly opposed the HNZ listing of the site, and consequently we find it difficult to believe they would support a covenant being placed over the site to support heritage outcomes. Agreement from the land owner is required for a heritage covenant (HNZA s39(3)(a)).
- (d) the length of time and resources required to effect a District Plan Change mean that a heritage listing in the District Plan is unlikely to be achieved prior to any application for new development, or building consent being approved for demolition of significant parts of the site.
- (e) additionally a new DP listing would not prevent demolition sanctioned by the Certificate of Compliance, because a Certificate of Compliance is a hedging device which protects the developer from potential changes to a District Plan (e.g. a heritage listing).
- (f) the effect of a heritage order supersedes the provisions of any District Plan or resource consent (RMA s193), and so is the only legal mechanism that at this stage can adequately protect the site from inappropriate development.

In fact lodgement of a notice of requirement also does this as it has the same effect as a heritage order (RMA s194).

- (g) the WCC has a responsibility to protect heritage in accordance with Policy 22(a) of the Regional Policy Statement, which states that:

District and regional plans shall include policies, rules and/or other methods that:

(a) protect the significant historic heritage values associated with places, sites and areas identified in accordance with policy 21, from inappropriate subdivision, use, and development.

The Karori campus has been identified via the Heritage NZ listing as having significant historic heritage values consistent with Policy 21 in the RPS. Consequently the WCC is required to protect it. A heritage order is an "other method" which would be included in the District Plan.



There is immense flexibility in the potential use of heritage orders. An order could be permanent, or it could be temporary, because a Heritage Protection Authority can withdraw a heritage order at any time. For example, in this case, the heritage order could be used to ensure heritage values are retained for the next five years during which a plan change listing the site could be put in place, ensuring protection for the site after the Certificate of Compliance lapses. It seems to us 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 Karori, occur.

The fact that a heritage order supersedes any existing provisions of a plan or resource consent suggests to us that heritage orders were designed for this very situation.

Heritage NZ is not the only agency able to act as a heritage protection authority. WCC, as a local authority, also has this right (s187(b)). As Mayor or Chief Executive you could lodge a notice of requirement to protect the Wellington Teachers Training College (Former) at Karori as a "*place of special interest, character, intrinsic or amenity value or visual appeal*" (RMA s189(1)(a)). This could be lodged as a temporary or 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.



We believe the current situation at Karori is the result of a number of unfortunate occurrences, one of which was the false assumption that heritage sites in government or public ownership could not come under threat without time to put in place adequate protection. This situation has highlighted a number of inadequacies in our current heritage protection systems, including the lack of a listing of this site in the WCC District Plan, and the lack of willingness, by those with the public responsibility to protect heritage, to use these instruments to provide robust and positive outcomes.

The recent (21 August 2018) building consent application by Ryman Healthcare to demolish half the buildings on the site means that demolition will be approved within approximately one month's time. We consider this matter to be one of extreme urgency.

Nāku iti noa nā


Christine McCarthy
President, Architectural Centre

cc. Hon. Grant Robertson, Member of Parliament, Wellington Central.
cc. David Chick, Chief City Planner.
cc. Wellington City councillors.