

28 January 2019

Simon Upton
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. Thank you for your letter of 10 December 2018 stating that you are of the opinion that "Heritage New Zealand is fulfilling its role of seeking to protect "part of a historic place," as per the Heritage New Zealand Pouhere Taonga Act 2013 section 13(1)(i) - in this case through negotiation."
2. With respect, I note that section 13(1)(i) is not relevant to the current situation.
3. This is because for section 13(1)(i) to be relevant Heritage New Zealand would need to be able to act as a heritage protection authority for the former Wellington Teachers Training College (WTTC), Karori under Part 8 of the Resource Management Act. This would require HNZ to have a heritage order for the WTTC confirmed.
4. As we understand it HNZ is yet to lodge a notice of requirement for a heritage order to protect the WTTC. This is an action that we have been asking HNZ to do for some time, and their resistance to do so in part prompted our initial request to the PCE to investigate the issue.
5. A heritage order would state what is to be protected and this could be the whole or part of an historic site with the purpose of protecting the "special interest, character, intrinsic or amenity value or visual appeal" of the site.
6. The geographical extent of any heritage order would, no doubt - in the case of a listed historic place, such as the WTTC - be determined by those values identified by the listing report - not "through negotiation" with the owner and developer of the site.
7. We are deeply concerned that you, as Parliamentary Commissioner for the Environment, consider that heritage "through negotiation" is an acceptable heritage protection strategy. This appears to us to be an extremely



the architectural centre inc.
PO Box 24178 Wellington

unambitious approach to heritage protection by New Zealand's "leading national historic heritage agency," and does not appropriately recognise the status of "the protection of historic heritage from inappropriate subdivision, use and development" as a matter of national importance in the RMA.

8. With the above in mind, especially noting that s13(1)(i) is not relevant to this case, we ask that you revisit our request for an investigation into whether or not Heritage NZ (HNZ) has failed to fulfil its function with respect to the former WTTC.

Nāku iti noa nā



Christine McCarthy
President, Architectural Centre