

Before Wellington City Council

Under the Resource Management Act 1991

In the matter of Plan Change 81 : Rezoning 320 The
Terrace and de-listing the Gordon Wilson
Flats

**STATEMENT OF EVIDENCE OF JENNY BENTLEY
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CAMPUS SERVICES**

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INTRODUCTION

1. My full name is Jennifer Helen Bentley.
2. My qualifications are Bachelor of Arts Auckland 1978 and I am a member of the Tertiary Education Facilities Management Association.
3. I am the Director of Campus Services for Victoria University of Wellington. In this role I am responsible for supporting the implementation of the University's Strategic Plan by the provision of land, buildings and services. I was therefore directly involved with the University's acquisition of 320 The Terrace.

SCOPE OF EVIDENCE

4. My evidence covers:
 - (a) The context for the University's acquisition of 320 The Terrace and why this District Plan Change is important for the future development of the University.
 - (b) The University's aspirations for 320 The Terrace as reflected in Plan Change 81.
 - (c) Some matters raised by submitters.

CONTEXT FOR THE ACQUISITION OF 320 THE TERRACE

5. Victoria University is a longstanding and vital part of the educational, social, economic and cultural life of New Zealand.
6. Teaching commenced in 1897, and in 1904 construction began on the Hunter Building on the Kelburn Campus. Since then the University has expanded to meet the needs of its students and staff and to play an increasingly important role in the future of Wellington and the Region.
7. In terms of Campus services, the growth of the University has been primarily accommodated on our Kelburn Campus. Our focus on the Kelburn Campus is necessary because it is our experience that there

are significant educational, research and economic synergies associated with facilities and services being centred at Kelburn.

8. For this reason, the University's Campus development strategy is to continue where possible to expand the Kelburn Campus. This strategy is reflected in our recent development projects. These have included the strengthening and refurbishment of the Hunter building, the development of the HUB building, the expansion of the Campus library and study facilities, and the current construction of our new science, research and teaching building on Kelburn Parade. Ancillary to such development are expanded Campus services such as student union, health and counselling services, and recreational facilities.
9. Because of our success in attracting students and staff and the space constraints at our Kelburn Campus, some of our services and facilities have had to be shifted "off site". This has included the Faculty of Architecture and Design located in Vivian Street and the Faculty of Law and the Victoria Business School located opposite Parliament. We have also had to locate student accommodation on The Terrace and also Willis Street.
10. The scale and significance of the University to the educational, social, economic and cultural life of the City and Region is significant. The University now has more than 23,000 staff and students and is the second to largest employer in Wellington behind Central Government. We are one of Wellington's most valuable growth industries, currently contributing over \$1 billion to the regional economy each year.
11. The importance of Victoria University to the Wellington economy is reflected in the Wellington Regional Economic Development Strategy. This Strategy, developed by the Regional Council and eight Local Government authorities in the Region, is to create an "Internationally Competitive Wellington". The Strategy acknowledges that the Wellington economy is slipping behind other Cities and Regions and that "we need to do better" (p2). The Strategy specifically tasks Victoria University, as one of Wellington's tertiary education providers, to be internationally recognised and to improve our research,

education and investment performance (p8). The Strategy has been adopted by the Wellington City Council.

12. The University's Strategic Plan has been prepared to give effect to the Strategy. A copy is attached to my evidence. Our vision is to be a world-leading capital city university and one of the great global-civic universities.
13. To have the impact that defines a great global-civic university, Victoria University needs to attain the scale typical of other leading public universities. Victoria must therefore nearly double our current size to approximately 30,000 equivalent full-time students. While doubling our size might sound ambitious, it is achievable provided Campus Services are able to be developed to keep pace with the rate of growth.
14. As I have stated earlier in my evidence, the University's Campus development strategy is to continue where possible to develop and expand the Kelburn Campus. This is because there are significant educational, research and economic synergies associated with facilities and services being centred at Kelburn. These synergies need to be harnessed if the University is to be a world-leading capital city university and one of the great global-civic universities.
15. There are still some available development sites on our Kelburn Campus. However, at the current rate of growth these will be developed in the next 20 years or so. Accordingly, we will need additional developable land adjoining our Kelburn Campus.
16. In 2012 Housing New Zealand (HNZ) contacted the University to see if we wished to purchase 320 The Terrace. Its attraction to us was obvious to HNZ because the property is the only sizable one that adjoins the Kelburn Campus and links down to The Terrace and towards Central Area.
17. We therefore undertook due diligence on the property and concurred with HNZ's assessment that the risks, practicalities and likely costs to strengthen and refurbish Gordon Wilson flats for continued public housing were prohibitive. We also satisfied ourselves that the risks, practicalities and likely costs to strengthen and refurbish Gordon

Wilson flats for student accommodation were prohibitive, and in addition would not result in a finished form of student accommodation that would be of an acceptable standard to us. Finally, we satisfied ourselves that the risks and likely costs to strengthen and refurbish Gordon Wilson flats for teaching and research space were prohibitive and would not result in finished floor space that would be at all practicable for this purpose.

18. For the above reasons, we concluded that the presence of Gordon Wilson flats was a significant disincentive to acquisition of the property.
19. We were also aware from our due diligence work that Gordon Wilson flats is included in the Council's list of heritage buildings under the District Plan and that to seek de-listing would involve proceedings under the Resource Management Act 1991 (RMA) with associated risks, costs and potential criticism from heritage advocates. Against this we had to weigh the strategic importance of a cleared site to the future long-term development and expansion of the University at Kelburn.
20. Because of the long-term importance to the University of securing expansion opportunities for our Kelburn Campus and a physical link down to The Terrace and towards the Central Area, the University decided to purchase the property.

THE UNIVERSITY'S ASPIRATIONS FOR 320 THE TERRACE AS REFLECTED IN PLAN CHANGE 81

21. The University wishes to demolish Gordon Wilson flats and immediately afterwards undertake landscaping and enhancement works along the lines of the post-demolition landscape plan prepared by Wraight and Associates Ltd and contained in Appendix 10 of Plan Change 81. This will enable the lower portion of the site to be used for open space purposes and the upper portion of the site to be enhanced as recommended by Wraight and Associates Ltd. Landscape enhancement will include progressive removal of weed species, appropriate pruning of species to be retained, and under-planting with natives. The whole of the site will be included in the Kelburn Campus landscape management contract and security contract.

22. The University's vision is to physically link the Kelburn Campus to The Terrace by way of a safe, convenient and attractive pedestrian access. This is a reasonably challenging task given the terrain. We therefore wish to harness the widespread expertise that exists within and outside the University community to make this happen. We will work with groups with experience and commitment to enhance the pedestrian environment. We also wish to involve nearby residents so that they can provide their input into the design and be assured their safety and security is taken into account.
23. As I stated earlier in my evidence, because there are existing development sites within the existing Kelburn Campus, building development on 320 The Terrace for university purposes is not anticipated for the next 20 years or so. While some may consider this to be an unacceptably long time for the site to be "land banked" by the University, the approach reflects the strategic importance and rarity of the land resource, and is required to effectively provide for and safeguard the future long term expansion of the University on its Kelburn Campus.
24. Plan Change 81 therefore provides for the de-listing of Gordon Wilson Flats from the District Plan heritage building list. This is the primary objective of Plan Change 81.
25. A secondary objective of the University is to change the zoning of 320 The Terrace from Inner Residential to Institutional Precinct in order to firstly show people by reference to the District Plan that the site is within the Kelburn "Institutional Precinct" Campus, and secondly to create provisions that enable future University buildings and activities on the site. While these proposed provisions are not essential to the University in the short to medium term, they are desirable in informing people of the University's long-term development aspirations for this site.
26. Prior to finalising and lodging Plan Change 81 the University engaged with the owners and/or residents of properties in the near vicinity of the site, and also with the Council's District Plan officers. This led to the following feedback being received:

- (a) Feedback was received from 12 owners/residents, including all the adjoining owners/residents. All are in support of the demolition of Gordon Wilson Flats, subject to the demolition being appropriately managed. Both these matters are provided for by Plan Change 81.
- (b) Housing New Zealand as owner of the adjoining property at 320A The Terrace supports the demolition of Gordon Wilson Flats and our Plan Change.
- (c) Wellington Electricity Ltd as owner of the adjoining substation site supports the demolition of Gordon Wilson Flats and our Plan Change.
- (d) Feedback was given to us on potential rules, standards and Design Guidelines for the site.

27. I also discussed the proposed demolition of Gordon Wilson Flats with Heritage NZ and obtained the feedback from them that is contained in Appendix 4 of Plan Change 81. This was that they did not wish to raise issues regarding our proposal.

RESPONSES TO MATTERS RAISED BY SUBMITTERS

28. I now wish to comment on two matters that are raised by submitters opposed to Plan Change 81.

Behavioural effects associated with our halls of residence

29. Some submitters seek to prevent or hinder potential student accommodation on this site because of the occasional adverse effects associated with the bad behaviour of students living within our halls of residence.

30. All universities in New Zealand provide residential accommodation for students. This is because the availability, location and quality of student accommodation are often key factors in a student selecting which university to enrol at. For this reason, the provision by Victoria University of well located and supported residential accommodation for our students as a permitted activity under the District Plan is critical to our function and our success.

31. Some of the submissions that raise the issue of bad student behaviour may encourage the erroneous impression that such behaviour is widespread and/or constant. This is not the case
32. In my role, I have been responsible for our halls of residence over the last 6 years, and this has included dealing with occasional complaints of bad behaviour received from some of our neighbours.
33. We have 3000 students in halls of residence. The vast majority do not behave in ways that give rise to any complaints at all. Unfortunately, a very small minority and sometimes their visitors act selfishly and in ways that disturb our neighbours. Alcohol often plays a part. Even so, the number and frequency of complaints is extremely small considering the number of students we accommodate across all our halls of residence.
34. While the University provides accommodation for students, they are responsible for their own behaviour. We would all like students to behave in socially acceptable ways and almost all of them do. However, we are not guardians of the very small minority who occasionally do not. They are adults and members of the community, and the occasional disturbance that affects some of our neighbours tends to occur from public places. That creates some difficulties for the University that we are working hard to address.
35. With these limitations in mind, I confirm that the University is committed to enhancing its effectiveness in addressing student bad behaviour. Some of our initiatives include:
 - (a) issuing students with **clear behaviour guidelines** and giving them briefings about expectations regarding behaviour and neighbourhood requirements
 - (b) providing **safety vans** to transport students to and from the CBD
 - (c) providing **health and wellbeing support** to students including information on appropriate alcohol usage

- (d) implementing **alcohol management strategies**, including alcohol free areas and alcohol-free floors in our halls of residence
- (e) **a range of penalties for breaches** of our regulations including alcohol-free period at our halls. These range from community service within the halls and reparation for any damage caused to suspension or eviction. Please refer to our Statute of Student Conduct which governs student behaviour in our halls and on our campuses
- (f) providing regular security patrols on Kelburn Park
- (g) regularly cleaning up at Kelburn Park

36. I accept that our efforts to date have not satisfied some of our nearby residents. I also accept there is room for us to improve our performance.

37. The University cannot however support differentiating 320 The Terrace from other parts of the Institutional Precinct by not permitting student accommodation use of the site. Student accommodation is already a permitted activity on the site under the Inner Residential zoning. And to incorporate the site within our Institutional Precinct zoning yet prohibit or not permit potential student accommodation would set an unfortunate and unjustified precedent for us and potentially other universities. It could also have implications for other groups in the community who require housing but are not considered acceptable by existing residents.

Heritage-related issues

38. The second matter raised by some opposing submitters is criticism of the University purchasing the property with the intention of demolishing Gordon Wilson Flats and thus not maintaining it since our purchase in September 2014.

39. As I have previously explained, the University was aware from our due diligence work prior to the purchase of the property that Gordon Wilson flats is included in the Council's list of heritage buildings under the District Plan. The University was also aware that to seek de-listing

would involve proceedings under the Resource Management Act 1991 (RMA) with associated risks, costs and criticism from heritage advocates. Against this, we had to weigh the strategic importance of a cleared site to the future long term development and expansion of the University at Kelburn.

40. At the time of our purchase I was satisfied that there was no prospect of any other purchaser of the property with the necessary experience and significant financial resources to retain, strengthen and refurbish Gordon Wilson Flats for public housing and with the capability to take on the potential financial consequences of the significant risks and unknowns involved in such a project. In this respect, it was significant to me that Housing NZ, who are an organisation specifically tasked with the continued provision of public housing, were not prepared to commit to the retention, strengthening and refurbishment of Gordon Wilson Flats for continued public housing.
41. The only other significant provider of public housing in Wellington is the City Council. The Council already has a significant portfolio of public housing that needs redevelopment. It also has a large portfolio of earthquake risk buildings and structures that need strengthening. It is therefore unrealistic in my opinion for it to be possibly suggested that the City Council could have been a purchaser but was prevented from doing so by our purchase of the property.
42. I therefore reject any suggestion that the University's purchase of the property has prevented a public housing provider from purchasing the property for continued public housing.
43. Our due diligence also convinced us that Gordon Wilson Flats would not be an attractive or sustainable proposition for conversion into private apartments, mainly because of the costs, risks, impracticability of conversion compared to new build, and the adverse heritage effect associated with the ceasing of public housing.
44. Another potential criticism of the University is that since September 2014 we have not maintained the building and therefore it has continued to deteriorate. This criticism is understandable from a heritage advocacy perspective. However as Housing NZ's decision shows, the building had already deteriorated to the point of being

uninhabitable for social housing and it is unrealistic to expect any party to invest in maintenance for a building that is not suitable for use.

45. I reject any implied criticism of the University's commitment to heritage. The University has demonstrated its commitment in many ways:
 - (a) The significant cost of strengthening and maintaining its existing heritage listed buildings on the Kelburn Campus (i.e. Hunter Building and Weir House).
 - (b) Maintaining the Mount St heritage cemetery (not owned by VUW).
 - (c) Maintaining and enhancing Te Herenga Waka Marae which is a significant heritage site on the Kelburn Campus identified by the District Plan.
46. Finally, some may argue that because the University has developed campus facilities outside the Kelburn Campus, Plan Change 81 is not vital to the University's future. This is not correct. As outlined earlier in my evidence, the University's experience is that there are significant educational, research and economic synergies associated with facilities and services being centred at Kelburn. Plan Change 81 will therefore provide for the efficient and effective long-term expansion of the Campus with associated benefits to the community.
47. Retaining the heritage listing of the building would create a number of adverse consequences:
 - (a) The University would be impeded from fulfilling its important role in meeting the long-term educational, social, economic and cultural needs of the City and Region by growing the Kelburn Campus in an efficient and effective way. We are looking to the Hearing Committee to support the growth and development of the University for the overall good of the community.
 - (b) It would undermine the Council adopted Wellington Regional Economic Development Strategy and its objective for an

internationally competitive economy that relies on maximising the role of tertiary institutions like the University for its success.

- (c) The building would simply continue to deteriorate because there is no other prospect for it.

CONCLUSIONS

- 48. Plan Change 81 is vital to the University's future. It will provide the University with a large development site adjoining the Kelburn Campus. This is a unique opportunity for the University which we request the Hearing Committee to facilitate for the good of the community.
- 49. It is accepted that Plan Change 81 involves a loss of some heritage value. However, this adverse effect is outweighed by the positive effects associated with the flourishing of the University that will be enabled.
- 50. I will try to answer any questions of the Hearing Committee.

JENNY BENTLEY
1 December 2015