

28 July 2017

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Re: Development proposal for Site 9, Wellington Waterfront

This submission is from the Architectural Centre, an incorporated society dating from 1946, which represents both professionals and non-professionals interested in the promotion of good design.

We have the following comments to make regarding the development proposal for Site 9 on Wellington Waterfront:

1. The Wellington City Council has a **Low Carbon Capital Plan 2016-2018** (LCCP) (October 2016)¹ which is less than a year old. It identifies "building energy use and private transport" as the areas where Wellington city can mostly make a difference today (LCCP p. 9), and asserts that "**if we don't stop creating the problem then our adaptation challenges become even more difficult**" (LCCP p. 12). It also states that currently 38% of Wellington city's emissions are from stationary energy (LCCP p. 17) - which includes building energy-use, and positions the council as "Leading by example" (LCCP p. 22).
2. We support the council's ambitions in the Low Carbon Capital Plan, but we do not see that it substantially translates into this project for Site 9. The council indeed (rather than just in word) needs to lead by example. **Council developments must be Zero Net Carbon** (ZNC) if Wellington is going to have a viable low carbon emissions future. By this we mean net zero construction emissions and net zero operating emissions proven by independent life cycle analysis. Including relevant analysis as part of any future resource consent application would assist in demonstrating that the council actually does care about energy-use and reducing our collective emissions. If the Council can't be assertive and progressive in this area then who can? Stating double-glazing and insulation are to be used in a building just doesn't cut it anymore - that's simply meeting very minimum requirements. It is common practice in buildings these days to have insulation and double-glazing. **This is not leading by example but being dragged along by the conservative apron strings of the Building Code.** ZNC building is defined as "a highly energy efficient building that produces on-site or procures, enough carbon-free renewable energy to meet the building operations energy consumption annually." Architecture 2030, for

¹ WCC "Low Carbon Capital Plan 2016-2018"

<http://wellington.govt.nz/~media/services/environment-and-waste/environment/files/low-carbon-capital-plan-2016-2018.pdf?la=en>



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example, has a brief statement outlining this.² This is the standard the Council must achieve to have integrity in relation to Climate Change.

3. It's nice that the council is planning to have passive solar power (Site 9 p. 7) - but what exactly does this mean? Sunlight through the windows? or sufficient photovoltaics to power the building's energy needs all year long? The detail on this is so vague **it is hard not to see this as green-washing.**³ This building is an opportunity to promote a partial green roof, rooftop water collection, grey water recycling, car sharing, electric vehicle charging, bike parking and *not* adding to conventional basement car parking (Site 9 p. 4).
4. Your Low Carbon Capital Plan explicitly queries the value of minimum parking requirements (LCCP p. 15). We cannot see a need for CBD buildings to provide car-parking, and note that Astelia Hotel has demonstrated the viability of this. The council needs to **promote urban life without car ownership and without car parks** which spend most of their life entertaining vacant space. Car-sharing, car-hire and taxis are viable supplements to regular PT use, walking and cycling.
5. The high levels of glazing (even when double-glazed) are a cause for concern when there is no plan, because there is no designated function yet. This amount of double-glazing will not ameliorate **the sins of glazing in terms of winter heat-loss and summer heat-gain**, and could be particularly worrying for residential (apartment and hotel) functions. We strongly recommend the reduction of glazing on the building because of its demands on energy. G7 of the building code (Natural light) needs to be considered to be a maximum (rather than a minimum) for natural light in order to minimise energy-use. The proposal of an exterior without any idea of how the interior will function also undermines any substance to the viability of their being "environmentally sustainable design" (p. 7). It is important to know what is meant by this term: "environmentally sustainable design" in this context. **What is the performance of the building in terms of energy and thermal comfort?**
6. The building is proposed for an environmentally tough site. Wind in particular can be an issue on the waterfront. How is this addressed in the design? How does the design meet the WCC Wind Design Guide? Will it improve the wind environment or not? Information regarding the impact of the building on the microclimate of public spaces around the building (e.g. wind and sun) would be helpful for a proper consultation.
7. The building's location on the waterfront, and within an area liable to flooding from sea level rise and/or tsunami, makes this building vulnerable. How does the design anticipate such issues in a resilient manner, and what are the potential liabilities for the Council? We also note that the design should anticipate the completion of the northern section of the harbourfront promenade, and any possible effects this might have on this building and its relationship to context.
8. As noted above, the proposed is for a building which currently has no use. Instead it is stated that there will be 4,000 sqm of lettable space (Site 9 p. 4), which may be "high quality commercial office space, serviced

² "Zero Net Carbon (ZNC) Building"

http://www.architecture2030.org/downloads/znc_building_definition.pdf

³ as defined by Wikipedia green-washing is "a form of spin in which green PR or green marketing is deceptively used to promote the perception that an organization's products, aims or policies are environmentally friendly." <https://en.wikipedia.org/wiki/Greenwashing>

apartments or a boutique hotel" (p. 5). At this point it seems vital to state the obvious: "What are the current needs of the city?" We have been, for most of this year, greeted daily with outcries for more housing, the increasingly the plight of the homeless, and intermittent responses from the Mayor and the Deputy Mayor claiming that **addressing housing supply**, social housing and affordable housing is top of the council agenda. We have been told that the housing crisis will take years to address and we are playing catchup. Owners of inner city office buildings are encouraged to convert them into housing. The stunningly obvious question to ask is: **why are we not addressing issues of housing need in this development?**

9. We are pleased that it is proposed that the ground floor be publicly accessible - well only half of it. But it appears that the focus will be commercial. **Is public space really public if you have to buy something in order to justify being there?** What space (and how much) will be available for people to use without pressure to spend money?
10. In a related matter, the proposal is light on what public facilities will be available. Will there be free wifi? free public toilets and changing sheds? free tourist information? a citizen advice bureau? ... Public access to a commercialised ground floor is not enough. **This is a public building. The best bit will be the rooftop. This needs to be accessible to the public too** - perhaps with some free viewing space, and a small cafe?
11. The document states that: "The design for site 9 takes strong cues from its historical maritime context" (p. 7). This is not evident in the design in any way. It just appears to be an average office block - be honest about it. It is not particularly adventurous or progressive in design terms; but aesthetically it is sufficient. More important than a faux heritage argument is an understanding of how the building will aesthetically and formally work in relation to the other structures of the waterfront (past, current and future) and its relationship to the CBD.
12. We have found that the consultation information is insufficient at a number of levels. The images of the building, for example, are deceptive. Glass seen from the outside of buildings is usually perceived as dark (black or grey) not transparent. This suggests the need for more accurate drawings for any future resource consent process. The text is shallow and needs more detail to support its claims. Saying something is "environmentally friendly" does not automatically achieve this. Give us the data and analysis to show that the building will actually be a positive contribution to the environment. **Give us a truly public architecture which the city can be proud of**, and one which has integrity aesthetically, environmentally and civily as a meaningful contribution to public space on the ground floor and on the best viewing platform of the roof. But also give us a building which is really needed in this time of housing shortage. **Show us some leadership.**

Thank you for this opportunity to comment on the proposed development for Site 9 on the waterfront at North Kumutoto. If you have any questions please do not hesitate to contact me.

Yours faithfully



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