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2016/17 Annual Plan  
Freepost  
Wellington City Council  
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**Re: WCC Annual Plan 2016/17**

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.

The Architectural Centre has the following comments to make regarding the proposed Annual Plan 2016/17.

**Draft Low Carbon Capital Plan**

1. We support the Low Carbon Capital Plan, but consider that the Council can be more effective and ambitious in what it delivers. For example, incentives for sustainable building need to be implemented this year - not over the next two years (p. 25). This includes WCC leadership in council building projects and in their support of infrastructure projects. For example, how does the runway extension support aims to reduce carbon emissions? In addition, the failure to date to reach targets does not instil confidence, and appears to be irreconcilable with the attitude that we are still on track to meet a 2050 target of 80% reduction of 2001 emissions (p. 15). What mechanisms will be put in place to make council accountable to meet targets set?
2. We strongly endorse the council's identification of building energy use and transportation as key areas of focus. We ask the council to show leadership with current projects. For example the proposed Johnsonville Public Library design is at odds with these ambitions, and, as such, sustainable moves such as a green roof, water collection, grey water systems need to be integral to the design. Council projects need to model sustainable behaviour. Wind power is an obvious energy source which the plan is surprising silent on with respect to sustainable building solutions.
3. We understand that financial incentives are also important, in form as much as in amount. For example recent PhD research (which examined commercial water-use in Auckland and Wellington, and audited 93 commercial buildings), found that the different structuring of water payments in Auckland (with charges for both potable and waste water based on meter readings) compared to Wellington (with charges for potable water based on meter but waste water

included in rates) significantly influenced water consumption.<sup>1</sup> Using the Auckland model of water payments would reduce our commercial water consumption.

4. We ask the council to explicitly engage with issues pertaining to embodied energy in this low-carbon capital plan. Operating energy is not the only source of emissions. In this regard early replacement of vehicles and/or buildings can exacerbate emissions. Similarly, we caution a singular focus on the electricification of electric vehicles without work toward reducing total city car ownership. We also encourage the council to invest in fast EV charging infrastructure. A system which is inconvenient will be a waste of money.
5. In this regard we ask the council to incentivise adaptive reuse over demolition as a sustainable strategy. An example is the Los Angeles Adaptive Reuse Ordinance which expedites adaptive reuse projects and, for heritage projects, removes the requirement to meet code compliance at the level of new constructions (e.g. fire regulations etc.). Such incentives would increase the viability of heritage projects, reduce landfill, and work toward minimising wasting embodied energy in buildings.
6. We appreciate the expressed sentiment of encouraging council staff and councillors to use transport alternatives to cars, but ask that a stronger requirement be instituted. For example, no CBD travel related to council business requires car travel. Snapper cards should be provided and walking encouraged.
7. We retain our position that to achieve significant mode shift to public transport, and to achieve high quality PT, we need to work towards a light rail system. We strongly encourage the WCC to work with GWRC and NZTA to plan for and achieve this.
8. Public transport needs to be more appealing than the private car if meaningful mode shift is to be achieved. While this is a complex issue, the current situation where car travel is largely cheaper than bus travel needs comprehensively addressing. We strongly encourage the council to work with GWRC to effect a free PT zone from the railway station to the Embassy with the aim of providing a more effective PT option for those who might catch trains but work in the Te Aro end of town, and find it cheaper and more convenient to drive to work. In a similar vein, enabling bikes on peak hour trains will assist in greater transport network flexibility and options for commuters.
9. We similarly encourage WCC to continue pushing GWRC and its other transport partners to implement fare transfers and daily maximum via Snapper in the short term. The national ticketing proposal is not a viable excuse for this delay.
10. We also note that the current conception of PT fares is strongly structured around the individual person, not couples, nor families, for whom public transport can be significantly more expensive than car travel.
11. We support the commitment to a compact city and the interrelationships between the Low Carbon Capital Plan and the Urban Growth Plan.

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<sup>1</sup> Bint, Lee "Water Performance Benchmarks for New Zealand: Understanding Water Consumption in Commercial Office Buildings" (Wellington: Victoria University PhD thesis, 2012) <http://hdl.handle.net/10063/3673>; "Reducing water consumption in commercial office buildings" *Phys.org* (12 December 2012) <http://phys.org/news/2012-12-consumption-commercial-office.html>.

12. We consider an additional benefit of phasing out Minimum Parking Requirements is a parallel phasing out of driveways, especially on arterial roads. Reducing driveways will increase options for, and safety and effectiveness of, bus lanes and cycleways.
13. With respect to cycleways, the Centre sees a viable CBD cycling strategy as a high priority. East-West permeability in particular is needed, and the current reliance on Karo Drive and the waterfront is significantly less than optimal.
14. We consider a greater investment in understanding behavioural change is needed in this plan. We consider that both psychologists and skilled advertisers could play a part in shifting the way we as a city think about issues related to climate change, and more directly transport and building. Understanding why we use specific transport modes and when is important, and could identify additional strategies (e.g. showers at workplaces) which effect a tipping point toward active modes.
15. The Royal Society's recently released "Climate Change Implications for New Zealand" (<http://www.royalsociety.org.nz/expert-advice/papers/yr2016/climate-change-implications-for-new-zealand/>) and "Climate Change Mitigation Options for New Zealand" (<http://www.royalsociety.org.nz/expert-advice/papers/yr2016/mitigation-options-for-new-zealand/>) may update some of the plan's contextual material.

#### **An Urban Development Agency for Wellington City)**

16. The Architectural Centre supports the creation of an UDA (Development Wellington), which delivers on priorities and policies set by the WCC that are subject to a public submission process. The precedent set by Wellington Waterfront Ltd and its Technical Advisory Group (TAG) provides us with confidence in the proposal. We also note the success of the San Diego Centre City Development Corporation (CCDC), which dates from 1975.
17. We consider that it is vital that the UDA will not "have ... policy making or regulatory roles" (WCC "An Urban development Agency for Wellington City" p. 8), and that the UDA operates without exemption from RMA and Building Act requirements.
18. We ask that the UDA's Constitution (TPG Planning p. 36) is subject to public consultation. We consider that this document (along with a robust TAG) will be crucial to ensure that the UDA does in fact deliver exemplary design quality as intended, rather than defaulting to the minimum standards stipulated in the District Plan. It is important that the governance structure is effective, and we encourage the WCC to learn from the problems experienced in Christchurch, which have been so well demonstrated by CERA, especially with respect to ineffective governance structures.
19. We ask that the legal structure of the UDA in relation to the WCC be such that the UDA is subject to the Official Information Act to ensure ongoing public confidence and UDA accountability.
20. The Centre supports at least one iwi appointee on the Council committee overseeing the UDA's activities (TGP Planning p. 38), and personnel diversity at every level of the UDA structure.
21. We strongly support the aim for the UDA to provide leadership via demonstration projects which champion exemplary design (which includes sustainable design and water sensitive urban design), innovative housing

projects, and inventive strategies for strengthening earthquake-prone heritage buildings, though we are sceptical of the ability of the UDA to have any significant impact on housing affordability issues until issues pertaining to money supply through lending (fueling high house prices) are addressed.

22. While we acknowledge the WCC's aspiration for exemplary, sustainable design of the city's built environment, we note that these values and high standards are not currently pervasive in council-led projects. In particular we point to the deficiencies in the proposal for the new Johnsonville Library, which suggest to us that, in addition to the role of the UDA, raising the bar set by the District Plan and associated Design Guides is also needed to achieve these aspirations.
23. The Centre is significantly less certain about increasing powers of compulsory acquisition beyond the existing Public Works Act as part of this proposal, and encourages the council to further articulate the need for this and undertake wider public consultation on this specific issue.

#### **Zealandia proposal**

24. The Architectural Centre has no opinion regarding the different organisational and Board appointment models (e.g. Council organisation vs Council-controlled organisation) proposed regarding the Karori Sanctuary Trust Board in order to address the continuing unpaid debt of the Board to the Council. We acknowledge the importance of the Sanctuary in terms of Wellington's biodiversity and supporting WCC aims related to sustainability. We also note that, given Wellington Zoo's status as our oldest conservation organisation, it appears unusual that there is no option which includes an organisational model to incorporate both Wellington Zoo (as a charitable trust) and the Karori Sanctuary Trust Board.

Thank you for this opportunity to comment on the proposed WCC Annual Plan 2016/17. If you have any questions please do not hesitate to contact me.

Yours faithfully



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