24 October 2013

Freepost WCC
Attention: WSUD Our Living City
Wellington City Council
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the architectural centre inc.
PO Box 24178 Wellington

Re: Water Sensitive Urban Design Guide

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.

Support for the Design Guide

The Architectural Centre congratulates the council for this draft Water Sensitive Urban Design Guide and we strongly support the adoption of this design guide. The design guide is a comprehensive summary of key issues and provides a range of ways in which designers and developers can actively implement water sensitive developments, including better water awareness and conservation.

We particularly commend:

(a) stormwater systems to address water quality as well as quantity
(b) water conservation and reuse
(c) strategic reduction of impervious surfaces in our city, and wider use of permeable paving in new developments (as well as in the CBD).
(d) the daylighting of streams
(e) the inclusion of water in the public realm (e.g. the design of water in public spaces, including increased opportunities for people to touch, play in, and engage with water)
(f) encouragement of green walls (including ongoing maintenance)
(g) the minimising of water pollution (e.g. source control of pollutants)
(h) recognition of the natural waterways (e.g. the Waimapihi stream) and progressive daylight currently culverted waterways
(g) the inclusion of green roofs, and rain water collection in new developments; though we do note that the use of green roofs needs to balanced with the need to ensure sufficient roof space is available for photovoltaics, which should be prioritised to achieve sustainable buildings.

With respect to the daylighting of waterways we believe that there is substantial rehabilitation work needed to restore Wellington's natural water systems - particularly throughout the CBD, and we strongly encourage the council to document culverted waterways and to put forward a process to remediate the city with regard to this.

The Centre also considers that greater encouragement of rainwater storage is needed for both everyday use, and to provide resilience in post-disaster contexts. We consider that greater use of rainwater storage will, along with green roof initiatives will take pressure of stormwater systems and improve our resilience.

The focus on stormwater does reduce opportunities for Integrated Water Management and wider consideration of recreational water use, and consideration of Māori water values.

There are a number of water-related issues which we consider could also be included in either this design guide or other council policies/regulations:

(a) design for climate change and sea water rises.
(b) possibilities for water to contribute to energy production (e.g. tidal power, and water mills).
(c) a section explicitly addressing the landscape design opportunities for big box retail.

Related issues regarding water and the built environment, which we believe other council policies should address, include:

(a) implementation of water meters in all residential and commercial buildings. We realise that politically water metering is not a popular idea, in part because metering is a mechanism that can be seen as a step toward water privatisation. The Centre does not support the privatisation of water, but we do consider that metering is a useful way to raise awareness of water use, and to incentivise good water use. We believe that innovative charging (e.g. no charge for those who use less than the average amount of water use; or an equal redistribution (rates rebate) to ratepayers of any money collected to effectively "pay" those who use less water) could be productive ways to ensure water in the city is cherished as a resource.
(b) building regulations facilitating the use of grey water, for appropriate functions, and the inclusion of composting toilets.
(c) progressive reduction of the flushing of high quality drinking water down our toilets. As a city we believe the council should set targets with the aim of reducing the number of toilets in the city that flush drinkable water. Possible targets might be:
    (i) within 2 years time all new developments must use grey water toilet flushing systems.
    (ii) within 10 years time all commerical buildings must use grey water toilet flushing systems.
    (iii) within 20 years time all residences must use grey water toilet flushing systems.
(d) rethinking the Council's use of water during dry weather for watering council gardens etc. Strategies such as: watering direct to the ground (rather than mist spraying) and in the cooler periods of the day (e.g. early morning or evening), and planting drought resistant plants in gardens, street medium strips etc. would reduce water use at the council level. We note that the Kapiti Coast District Council have numerous initiatives for saving, reusing, and storing water, and water education.
(e) greater public education (e.g. the cost of producing water, pumping water and waste water etc.)

Administrative issues
1. Unusually for council consultation practices, there was no text only version of the design guide made available, and, given the draft policy's advocating of sustainable principles, it was unfortunate that the document design was very wasteful of paper (both due to page layout and the number of blank pages).

2. There is alot of technical background information which non-experts may have found intimidating and the council may have gotten broader feedback if this document had been "translated" into a more user-friendly document for members of the public.

Thank you for this opportunity to comment on the Water Sensitive Urban Design Guide. If you have any questions please do not hesitate to contact me.

Yours faithfully

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