

Freepost WCC
Attn: Rebecca Ramsay, Reserves Planner
Wellington City Council
P.O. 2199
Wellington 6140
New Zealand
suburbanreserves@wcc.govt.nz

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re: DRAFT SUBURBAN RESERVES MANAGEMENT PLAN (DSRMP)

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 generally supports the DSRMP. We make the following comments:

Identity/Culture

1. We note that the legibility and character of open space networks is an important part of the identity, character, and place-making potential of Wellington. In this we agree with the DSRMP regarding the significance of many landscape features (e.g. 1.4 pp. 4, 6) including the town belt and green skyline.¹ We acknowledge there is some recognition of the significance of place-making reflected in the District Plan, but note that many protected viewshafts are oriented toward the harbour from the CBD. We encourage the council to identify and implement suburban viewshafts to ensure that - prior to the development of increased residential density in suburban areas - key views which are important to suburban identity and place-making are protected in the District Plan.
2. The proposed DSRMP appears to be anti-building, advocating a position where buildings are to be hidden (e.g. "Care will be taken to **minimise visual distraction** from the natural environment" (2.1.2), "Appropriate form, scale, materials and colour scheme will be used to **integrate** development into the landscape" (2.1.2), "Colour schemes, planting and site design associated with existing buildings and structures shall be reviewed ... to ensure that they **well-integrated and complementary** to their surroundings" (2.1.2) emphasis added).



¹ We note the management of the town belt is covered in the Wellington Town Belt Management Plan (1.2), and presume that, if the Town Belt Bill is passed, the town belt will no longer be defined as a reserve under the Reserves Act (1977) and will be excluded from this town belt management plan). In a similar vein we note that the Basin Reserve has been excluded from this management plan exercise. We understand that there is no current management plan for the Basin Reserve so see this as a priority. Incorporating the Basin Reserve into this management plan could be a interim solution for this.



the architectural centre inc.
PO Box 24178 Wellington

As such, we strongly recommend that the council endorse a more sophisticated policy with respect to building and advocate for good design, appropriately located, rather than one promoting the hiding of buildings through muted or camouflage colour schemes, and the removal of buildings. In this regard, we consider that it is important to acknowledge that parks are **not** natural environments, but rather are cultural landscapes.

3. We also note the potential for building colour to reflect the full chromatic range of New Zealand indigenous plants, which include white and pink (manuka, kanuka), red (pohutakawa, rata), and yellow (kowhai), and suggesting a more productive and progressive way to consider the relation of building to plant life, in contrast to the dreary tedium of muted greens and browns, which typically result from such policies (e.g. the Waitakere ranges, Auckland).
4. Built structures are important in aiding the formulation and distinctiveness of local, suburban identity. In addition, buildings and structures can heighten the experience of the natural environment (e.g. the Otari-Wilton Bush canopy walkway, West 8's Garden of 10,000 bridges, Rural Studio's Lions Park, Greensboro, AL, and Tararua Forest Park ladder)



Heritage

5. The DSRMP states a need for heritage interpretation (2.4), which appears to be focussed on the history of the park (i.e. "many reserves that have no visible heritage items ... have their own "story" associated with how they came to be public open space" (Summary p. 10)). This appears to consider whenua as confined to a European cultural notion of land, and is ignorant of the heritage, cultural significance and history of the land that the reserves are on prior to their park history, and prior to Pākehā settlement. In a similar way phrases such as "during its settlement in the 1840s" needs greater precision (e.g. "during its English settlement in the 1840s").

6. We recommend that any heritage interpretation is done in collaboration with (as distinct from simply in consultation with) mana whenua,² and the brief for such interpretation is widened to include events beyond the narrow and recent history of park formation, to include the cultural, social, economic, and historical significance of the site in a broader sense. Likewise we suggest that 2.4.2 be amended to place mana whenua prior to Heritage NZ.
7. Heritage is explicitly described as "commemoration, mourning and remembrance" (Summary p. 5). We consider that issues of heritage might be broader than this and less morbid. A more contemporary notion of heritage is usually linked to issues of current community values, and we suggest that such a definition might be a more productive starting point.
8. The DSRMP states that "Whenever possible Māori place names will be used, on signs and maps, plant labels and interpretation" (2.4.2). We understand that Māori have many names for places, so we do not understand the hesitancy conveyed by "whenever possible." We recommend that Māori place names are used when mana whenua support this, and, where appropriate signs, maps, plant labels and interpretation are bilingual.
9. We also note the importance of heritage trees with respect to the council's policies and regulations (also Summary p. 30), and consider that these must have integrity and public confidence: that is to say that a scheduled heritage item should be considered to be a scheduled item. We note this with reference to evidence given by a former WCC officer (heritage adviser) with respect to a heritage tree at the Basin Bridge Board of Inquiry. In her evidence she noted that:

One "Heritage" Tree is to be removed (#204 in the relevant District Plan Schedule – an English Elm). The supporting inventory to the schedule does not contain any heritage based information, which suggests that the tree is a "notable" tree rather than a "heritage" tree which places it outside of consideration in this heritage evidence." [27]

(Rickard EIC 13 December 2013).

We strongly recommend that the council provide sufficient resources to ensure that scheduled heritage items have integrity, to ensure developers have confidence about their status, and to prevent any retraction of the heritage status of scheduled items during resource consent and notice of requirement hearings.

Sustainability

10. We note that the proposed removal (demolition) of potentially functional buildings (2.1.2; Summary p. 8) is at odds with the council's stated support for sustainable practices. Current best practice minimises waste because of the embodied energy used in making building products, and constructing buildings. If buildings are to be removed from the town belt, and other suburban reserves, we consider that a practical plan for re-use of the building (i.e. relocation) is effected, but only after re-use on site is considered. The re-use of building materials is another, but second, possible option, but practically may be limited in many instances, making re-use a more plausible sustainable option.
11. We strongly support the ecological and biodiversity aims of the DSRMP (1.4, p. 6) and support council intentions to increase green corridors through "link" reserves.

² We note that the terms "collaboration" and "partnership" (2.3.2) are used with respect to biodiversity and ecological issues, and the lesser term "consultation" is more often used with respect to cultural heritage issues (2.4.2).

Provision of land

12. We support the council's intention to "work with developers to establish reserves that recognise significant landscape and amenity values and contribute to a wider landscape connectedness and coherence" (2.1.2). We also appreciate the need to explore additional "planning mechanisms that could be employed to fund new reserves and/or development" (2.2.2).
13. Given the stated difficulty of purchasing new sites,³ we are concerned regarding proposals to decommission existing parks (e.g. Summary pp. 30, 33, 39). Does a definitional oversupply of suburban reserves indicate potential for increased residential density? The draft plan refers to strategies for preventing excessive provision (2.2.3). What is meant by this? Is there an intention to remove some space?
14. Given the stated difficulties in the provision of land for traditional open green space reserves, we remind the council that streets also have the potential to provide recreational space. In addition to low traffic cul-de-sacs, the design of suburban neighbourhood streets has the potential to also accommodate and be recreational space. We refer to Australian research by Tranter and Doyle "Reclaiming the Residential Street as Play Space" as an example.⁴
15. There is a need to secure land for inner-city recreational space prior to significant increases in inner-city population (note 2.2.2). We strongly encourage the council to put together a plan for identification of possible properties to purchase in order to accommodate, and safeguard, the needs of future generations. We are not convinced by the argument that areas with high numbers of school-age children have a lower priority regarding the provision of play areas, if this also means a lower provision of parks. While we support partnerships with schools which enable wider public access to the open space of school properties outside of the school day (2.2.2), we also consider that the age demographics of suburbs change, and the provision of life-long parks is a fundamental requirement for all communities. Changes in age demographics may require the redesign of parks, but not the need for dedicated space for park provision.
16. We note the use of the term "a significant majority of dwellings" (2.2.3; Summary p. 6) with respect to playground provision and have no idea what this actually means. Presumably a significant majority could be anywhere between 55% and 99%. The percentage intended needs to be explicitly stated (e.g. 75%) and a maximum distance from playgrounds for the remaining minority of households needs to be also explicitly stated so people know what the council is actually talking about.

All ages, all abilities

17. The DSRMP refers to a desire to both provide for specific populations,⁵ and a desire for design for all.⁶ The plan also states that council reserves aim to

³ e.g. "buying land is seldom a viable option due to the cost of purchasing land in built up areas" (2.2.2) and there is "limited opportunity to provide more suburban parks in the established neighbourhoods" (1.4, p. 4).

⁴ Tranter, Paul J. and John W. Doyle "Reclaiming the Residential Street as Play Space" <http://www.ecoplan.org/children/general/tranter.htm>

⁵ e.g. "More tracks will be developed that are accessible and usable by people with limited mobility, push chairs and wheelchairs" (Summary p. 8).

⁶ e.g. "tracks accessible to all ages, and abilities" (1.5, p. 8; Summary p. 4).

"[e]ncourage greater, flexible and more creative play for all ages (including young adults and the elderly)" (2.2.2).

18. These are all laudable aims, but we note that such provision can produce conflicts, and compromised design. For example, the requirements for universal accessibility produces routes that are often assumed to be suitable for cycling, yet universal design requirements conflict with the minimum AustRoads standards for cycling (e.g. inadequate turning circles) because the geometries which are optimal for wheelchairs are very different to those suitable for cycling.
19. We suggest therefore that a different strategy for meeting the needs of our diverse populations is needed, which may mean that some spaces are not, for example, optimal for every different population group within the city. We suggest that there is no such thing as ideal space for all cultures, abilities, age etc., and attempting to do so can produce compromised spaces. To design a space which accommodates all physical abilities, for example, will require a design focussed at the ability of the least able, which may be a boring walk for those with more advanced ability, resulting in lack of use by this group.
20. In a similar vein the design of shared use tracks (i.e. pedestrian and cycle (2.2.5)) is not always straightforward, and needs specific design (path width, judicious surface selection) which, even on flat surfaces, considers the challenges of pedestrian/cyclist conflicts caused by preoccupied texting by "zombie" pedestrians,⁷ and relatively quiet cyclists.
21. We also wonder if the current plan will privilege families with young children at the expense of those children when they grow older. We propose that the council think of the open space network as being a life-long network to prevent the phenomenon of children outgrowing our parks, and to ensure that the city as a whole, provides suburban park viability across all ages. It could be that the space network is considered as a matrix of multiple networks addressing these different needs. In addition to ensuring our suburban park network accommodates children and disabled users, should the council also explicitly develop a deliberate plan for advanced users?
22. We also note the observation that bowling clubs are closing (2.2.7, 2.2.9). We appreciate the brief note regarding the need for parks to "adapt to the needs of an ageing population" (1.4, p. 4), and consider this to be an issue of greater importance than this brief mention suggests, given the forecasts of an ageing demographic. We consider that it is important for the council to plan for the design of parks for older people. Such parks will require specific design relative to colour, wind, surface treatment and slope. It possible that specific senses are considered, such as the Lady Mckenzie Garden for the Blind in Thorndon, the design of which deliberately incorporates smell.

Post-disaster resilience

23. We note that open and green spaces have had an important function in post-disaster contexts historically (e.g. San Francisco 1906, Napier 1931). We consider that an appreciation of, and anticipation of, such a use could be threaded through the Suburban Management Plan (including issues of legibility and sightlines). We consider this is an important part of "building resilient communities" (1.4, p. 4).

⁷ "China creates cell phone lane for "zombie pedestrians" who want to text and walk" *News Everyday* (15 September 2014) <http://www.newseveryday.com/articles/1024/20140915/china-creates-cell-phone-lane-for-zombie-pedestrians-who-want-to-text-and-walk.htm>

24. We also note that community gardens and camping sites may also increase the city's resilience in post-disaster contexts. Vertical gardens may also be important to consider, especially as suburbs increase their residential density. In this regard we encourage the council to anticipate both increased suburban residential development and the need for such development to provide for recreational and open green space as part of any such development.
25. While we acknowledge the fundamentally undeveloped nature of the reserves as an important aspect of their character, we also consider that built structures are an important aspect of the viability of open spaces in post-disaster contexts. For example, in post-disaster contexts, legibility and visibility of built structures are important - and could have life-saving ramifications. Provision for this may test the apparent anxiety expressed in the DSRMP regarding building on skylines and prominent locations (e.g. "No new building or structures of any kind will be permitted on the skylines and ridgelines as viewed from the central city or suburban centres or the harbour" (2.1.2)),⁸ and the use of distinctively coloured buildings (e.g. 2.1.2).

Park use/design

26. Built structures are important to facilitate the use of parks, even the apparently simple activities, such as "sitting to admire the view, think or knit" (2.2). Such structures can make exposed sites congenial, and ameliorate environmental effects, such as wind and, given our skin cancer rates, the sun (e.g. the provision of warm shade).⁹
27. We challenge the assumption that "an area containing ecologically significant vegetation and an area of flat space for informal recreation would obviously be of higher value than a steep grass-covered slope, and see such sites as having potentially high recreational values (e.g. ecological, recreational activity and viewing potential) if they are innovatively designed. We encourage the council to use one of these steep slopes to be the site of a design competition (e.g. a vertical park Design Competition) to test potential models for new types of park and recreational space in Wellington.

Safety/design

28. In planning and designing interconnected green open space we suggest that there is a need for a balance between canopy coverage, and views through for safety (i.e. CPTED (c.f. 2.2.2)) - given that "open" spaces are often not that open, due to low canopies and/or dense bush. We consider that this balance is one of the effects which ought to be added to the stated values related to the consideration of vegetation removal (i.e. "The effects of vegetation removal, maintenance and new planting on the following values will be considered on a project-by-project basis to guide management decisions" (2.1.2)).

Spatial diversity

29. The open and recreational space framework is made up of many different types of space. For example: traditional green open space, blue space (including the daylighting of waterways, and possible interpretation of culverted streams where daylighting is not yet possible/practicable, as articulated in the Central City Framework (e.g. stream streets) (pp. 53, 58-59) and the Water Sensitive Urban Design Guide), and inside open/recreational space.

⁸ We note also that this description appears to primarily apply to the town belt rather than to suburban reserves.

⁹ Cancer Society "Stay in the shade"
[http://www.cancernz.org.nz/Uploads/media%20release_shade.pdf](http://www.cancernz.org.nz/Uploads/media%20release%20shade.pdf)

30. We also note the increasing importance of recreational space which is accessible during the working day (usually lunchtimes). Spaces such as Shed 1, Queens Wharf, which provides important indoor soccer facilities, are increasing fulfilling a role formerly only provided by traditional green open space. Such indoor open space also ensures the continuity of recreation through winter months. This indoor open space is important to also understand in the context of understanding Wellington's recreational space (2.2.7); that is to say that a recreational network will not be exclusively one of suburban reserves.
31. We recommend that these diverse recreational and open space types are mapped, in order to better understand the changing recreational needs of the city.

Transport

32. We note the stated desire to support the "Our Capital Spaces" outcomes including "getting everyone healthy" (1.5, p. 7). We endorse this aim, and encourage the council to pro-actively consider the relationships between both active transport modes, **and** public transport and the open space reserves network, making these transport forms a viable supplement to achieving increased physical activity across the city's population.

In closing

33. We note the emphasis in the GWRC's draft Regional Plan Review on ki uta ki tai (connectedness as the managing of natural and physical resources in an holistic manner, recognising that they are interconnected and reliant upon one another), and suggest that the WCC explicitly make a similar reference, as it appears to us that this kaupapa is an underlying intention of the DSRMP.

Thank you for this opportunity to comment on the DRSMP.

If you have any questions please do not hesitate to contact me.

Yours faithfully



Christine McCarthy
President, The Architectural Centre
arch@architecture.org.nz