

5 October 2012

Attn: City Planning  
Dunedin City Council  
P.O. Box 5045  
Dunedin  
planning@dcc.govt.nz

**Re: LUC-2012-212: 41 Wharf St: construction of a 27 floor licensed hotel and residential apartments (plus basement)**

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. Any members of companies involved in this Resource Consent application (and hence having a potential or actual conflict of interest), have not been involved in the writing of this submission.

The Architectural Centre strongly opposes this application for Resource Consent.

**Contextual Comments**

This proposal must be understood in the context of the significant urban design challenges that Dunedin has in relation to the disconnection between the city centre and its waterfront. Despite being in close physical proximity, the current organisation of the city (including the severance caused by the railway tracks, and inconsiderate developments which have built lengthy inactive edges (e.g. the Chinese garden)), has created a huge psychological barrier which prevents maximisation of the waterfront as a public amenity. While such errors might not have been forecast 100 years ago by the Public Works Department (when laying the railway tracks at a time when cities often turned their backs on the industrial activities of a port), best practice in urban design today advocates ensuring connectivity through a permeable urban fabric in order to achieve visual and physical connections between the city and the waterfront. The Architectural Centre believes that the city must address and solve this issue by articulating a city-to-harbour framework which identifies strategies to dramatically improve city-to-harbour connectivity including: viewshafts, the identification of sites for potential development (with appropriate height limits), identification of significant heritage fabric, and a future roading plan, such as the proposed extension of Rattray St through to Wharf St. There is recognition of this need in the Dunedin Central City Framework,<sup>1</sup> and the Dunedin City Spatial Plan,<sup>2</sup> but further development is needed (possibly with the support of a local Technical Advisory Group) to enable the evaluation of building proposals in terms of strategic, and locally appropriate, development.

**Our reasons for opposing this application for resource consent are as follows:**

**(1) Siting: The hotel is poorly sited.**

In addition to the building's negative visible impact and extensive shadow-casting onto its larger neighbourhood (see later), the proposed site is bordered by the main railway line south and a regional road. The proposal amplifies the idea of "island" by effectively

<sup>1</sup> Urbanismplus Ltd/DCC "Dunedin Central City Framework & Warehouse Precinct Plan" pp. 13, 56, 91.  
<http://www.dunedin.govt.nz/whats-on/central-city-plan/documents>

<sup>2</sup> "Dunedin Towards 2050 - Spatial Plan for Dunedin: He māhere Wāhi ki Otepoti" (September 2012) p. 36.  
<http://www.dunedin.govt.nz/your-council/council-documents/policies/spatial-plan-for-dunedin>



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proposing to strand hotel visitors, and confine them to a "self-sufficient"<sup>3</sup> hotel/apartment building potentially reducing much of the economic benefit of the project to the wider city. The hotel is proposed to perform as a cruise ship rather than a tourist hotel, which would encourage visitors explore its city location.

This aspect of the proposal makes sense only because of the site's isolation caused by its bounding traffic. The "recorded traffic volume of 1,300 vehicles per lane is extremely high,"<sup>4</sup> with Abley Transportation Consultants Limited recording an even higher volume of 1,867 vehicles at the two peak times during the day in the traffic lane closest to the hotel.<sup>5</sup> In addition this four-lane road (Wharf St) has a concrete medium barrier, making pedestrian access from the hotel's traffic island difficult. This situation will mean that the hotel visitors will be largely trapped within the hotel requiring car-dependence to leave the hotel site. Such a proposal contradicts all best practice in urban design, sustainable city, and pedestrian city thinking, and it exacerbates, rather than ameliorates, the existing problems of Dunedin's psychological block between city and sea. To do this is retrograde. In the application's hesitant wording "in the Dunedin context, they [conditions for pedestrian connectivity] are less than ideal."<sup>6</sup>

The building hence compounds the severance of the central city from the harbour's waterfront, in contrast to the acknowledged need to connect cities to their waterfronts for civic amenity and economic vitality. We believe that building what amounts to a 118 metre long wall along the foreshore will exacerbate this problematic disconnection between city and sea, and that the proposal will compromise the potential of access to the harbour as a natural resource for future generations of the city. By this we mean that constructing this building will disable the ability for the DCC to plan and execute a number of strategies to make better city-to-harbour connections.

## **(2) Urban Design: The proposed building will negatively impact on urban design outcomes.**

We do not believe that the building "will be a valuable contributor to the Urban form of the city,"<sup>7</sup> as mischievously suggested in the Design Statement. In addition to the proposed building's negative siting, the application refers to the New Zealand Urban Design Protocol's "seven Cs," although many key objectives of the Protocol appear to be misunderstood by the consultant entirely in many cases. Discussing "character," for example, the letter states that "the proposal provides the opportunity to reintroduce character into the area. Not a historic character, but one that looks forward to a positive Dunedin future."<sup>8</sup> Whilst some concession could be made given the relatively sparse and low-rise surroundings, this does not mean the site is completely free of existing context altogether. The applicant's claim contradicts (or misunderstands) the "character" guide outlined in the protocol, which requires projects to reflect the unique identity of areas, protect heritage places, and create *locally appropriate* inspiring architecture, etc.<sup>9</sup> As signatories to the New Zealand Urban Design Protocol, the DCC should not accept this superficial use of the document. In addition, the location for a building of this proposed height will confuse the underlying and quite coherent urban form of the city.

## **(3) Heritage: The building ignores of its context.**

The area proposed for the building is adjacent to a significant site of small-scale industrial heritage buildings related to Dunedin's wharf history. As a group we do not oppose sensitive and elegant developments in, or adjacent to, heritage areas. Our prime interest is in advocating for good design, which comprehensively merits construction. There is some suggestion that the methods and materials of construction

<sup>3</sup> Anderson & Co. "Response to Further Information Request" (30 May 2012) p. 3.

<sup>4</sup> Abley Transportation Consultants Limited "Betterways Advisory Limited: Proposed Hotel - Dunedin" p. 13.

<sup>5</sup> Abley Transportation Consultants Limited "Betterways Advisory Limited: Proposed Hotel - Dunedin" p. 14.

<sup>6</sup> Don Anderson, Memorandum to Lianne Darby/John Sule (30 August 2012) p. 4.

<sup>7</sup> "Dunedin Hotel Architectural Design Statement" 29 August 2012) p. 1.

<sup>8</sup> Anderson & Co. "Response to Further Information Request LUC-2-12-212" (28 August 2012) p. 2.

<sup>9</sup> Ministry for the Environment *New Zealand Urban Design Protocol* (Wellington: Ministry for the Environment, March 2005) p. 19. <http://www.mfe.govt.nz/publications/urban/design-protocol-mar05/urban-design-protocol-bw.pdf>

will help reinforce the heritage values of the surrounding area by offering a contrast.<sup>10</sup> This is certainly a recognised method of addressing heritage but the scale of this building is wrong (it is far too big) and so what may have been well intentioned attempt is ultimately flawed in execution. The design of this building makes no attempt to engage with or understand context (the character, heritage, urban form or scale) of its location.

**(4) Scale: The height of the building is relates poorly to its precinct.**

The Architectural Centre believes that the size of this building (96 metres high) is completely out of scale for the area, and for Dunedin as a whole. Its siting on this reclaimed wharf area means that the building (which is located among very small scale industrial buildings of generally 1-2 storeys), will inappropriately dwarf, and overshadow many of the buildings in the area. The unrelenting width of the block across the field of vision of those people who are in public spaces further inland will restrict important views out to the harbour. In addition, there is an arrogance communicated through the proposed layout that disrespects the public whether or not their views will be wholly or partially affected by the form and location of the proposed building. Its visual impact will affect many parts of the city, and it will block existing harbour views from the hillside residences. As noted by the applicants: "In visual terms, the proposed building is more dominant than any existing Dunedin building."<sup>11</sup> In addition to the negative visual impact of the building on the surrounding city, a building of such a height will cause significant wind effects on ground level. We endorse the council officer's appraisal of a building of 96 metres high, which suggests the inappropriateness of this building height for this industrial-zoned site: "an industrial building on the site of this scale is considered by the Council to be fanciful."<sup>12</sup>

**(5) Sustainability: The building embeds unsustainable practices, and is not resilient at an urban scale.**

There are many buildings in Dunedin which are underutilised. As the "Dunedin Central City Framework Report" observes, there is a "Stock of vacant and underutilised heritage buildings in the Warehouse District in a fine-grained urban fabric."<sup>13</sup> The Central Post Office for instance is a large central city building which remains vacant. Proposing a building of the magnitude proposed in this Resource Consent application is socially and sustainably irresponsible in a city with an excess of existing building stock.

The building is also irresponsible from a transport perspective. The expectation<sup>14</sup> that the majority of visitors and workers of the hotel will arrive/depart by vehicle, and that there will not be any "large concentration of pedestrians," demonstrates the need for wider urban issues to be addressed as such a project will reinforce the car-dependency of developments such as Mitre 10 Mega (South Dunedin), the Warehouse (South Dunedin and Maclaggan St), and numerous supermarkets which undermine council attempts to make Dunedin a sustainable and pedestrian friendly-city.<sup>15</sup> The proposed hotel is 600m (6 minutes) from the railway station (which one day might actually be used to transport people intercity), and a further 400m (4 minutes) from the bus station, yet the site's isolation (due to traffic and psychological factors) undermines the viability of the project positively contributing to any notion of a sustainable city. Is there an expectation that hotel visitors will also drive to the Forsyth Barr Stadium (approx 2km away), which the applicants state will be a key reason feeder for visitor accommodation?<sup>16</sup>

<sup>10</sup> Ignite "Dunedin Hotel Architectural Design Statement" (29 August 2012) p. 3.

<sup>11</sup> Don Anderson, Memorandum to Lianne Darby/John Sule (30 August 2012) p. 2.

<sup>12</sup> John Sule, Senior Planner, "LUC-2012-212- 41 Wharf Street - Request for Further Information." (25 May 2012) p. [1].

<sup>13</sup> Urbanismplus Ltd/DCC "Dunedin Central City Strategic Directions for the City Centre and Warehouse District [Framework & Warehouse Precinct Plan]" p. 13. <http://www.dunedin.govt.nz/whats-on/central-city-plan/documents>

<sup>14</sup> Don Anderson, Memorandum to Lianne Darby/John Sule (30 August 2012) p. 3.

<sup>15</sup> "Improved Pedestrian and Cycle Safety in the Central City" <http://www.dunedin.govt.nz/whats-on/central-city-plan/improved-pedestrian-and-cycle-safety-in-the-central-city>

<sup>16</sup> Don Anderson "Resource Consent Application: 41 Wharf Street, Dunedin" (11 May 2012) p. [2].

The hotel will also increase the need for car parking beyond its site,<sup>17</sup> because only 97 of the 164 carparks required by the DCC will be provided. Additional parking will likely be needed to support hotel staff, and are not included in this application. This situation will also require visitors to (presumably) cross through the surrounding traffic, highlights the proposal's negligence with regard to pedestrian safety, as well as initiating the negative impact of car parking provision.

**(6) The application is insufficient for a building of this scale.**

The application is not well prepared and lacks the detailed environmental impact investigation and analysis required by the RMA. It presents a one-sided view primarily of the building's more positive impacts whilst underplaying the negative ones. We do not consider that the application demonstrates a reasonable project, nor does it take responsibility for the negative impacts the building will cause, instead it leans rather lazily on notions of co-operation, suggesting that others will be required to mitigate negative impacts. At several points in the application (e.g. Urban Design evaluation and Design statement) it appears as if the application process is not being engaged with sufficiently thoroughly, and respect for the process, the Urban Design Protocol and the residences of Dunedin is not apparent.

The Architectural Centre strongly opposes this application for Resource Consent and urge the DCC to refuse the application.

Thank you for this opportunity to make a submission on this Resource Consent application.

Yours faithfully

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<sup>17</sup> Abley Transportation Consultants Limited "Betterways Advisory Limited: Proposed Hotel - Dunedin" p. 34.