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Freepost  
Wellington Urban Growth Plan (COPOO2)  
Wellington City Council (CAB2)  
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**Re: Draft Wellington Urban Growth Plan**

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.

**Introduction**

1. Overall the Architectural Centre supports the Draft Wellington Urban Growth Plan.
2. We do not however support greenfield development, and consider that redevelopment of existing sites, and building on brownfield sites and infill sites within the city, especially along the growth spine, have sufficient capacity to accommodate increased population growth. We also believe that increasing Wellington's population density will be beneficial to the city. We believe that the council's proposal to encourage development on greenfield sites, including "completing a stocktake of other greenfield expansion opportunities" (p. 55) to be a complete contradiction to an apparent commitment to retain Wellington as a compact city (pp.10,19).
3. We find a similarly significant contradiction exists in relation to the document's assertion that the council's plan is to "encourage and prioritise walking, cycling and public transport over other modes of transport" (p. 43), and the transport strategy "recognises in priority order: pedestrians, cyclists, public transport, moving freight and private vehicles" (p. 50). Yet the document seemingly winces at the possibilities to rebalance the current roading infrastructure to materially achieve this stated hierarchy, and instead states that there needs to be "improvements for private vehicles" (p. 37). The continued prioritising of cars over pedestrians and cyclists also seems apparent to us in the Island Bay Cycleway proposal, which maintains the secondary importance of pedestrians and cyclists to the point that footpaths are narrowed and the cycle route is less direct. These suggest to us that the council needs a significant shift from its current mindset into order to meaningfully achieve this council policy.
4. We acknowledge that many of the relevant issues are interconnected and overlap, and, while we have aimed for clarity in our section headings, we do caution readers that a straightforward categorising is not really completely achievable.
5. Our comments below address the broader over-arching aspects of the Draft Wellington Urban Growth Plan and also introduce a number of very specific proposals (e.g. an inner city shared space network, encouraging tidal power as a sustainable energy source, and implementing an affordable housing provision) which we think could be good vehicles for achieving higher level objectives.



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## Population Density and Growth Spine

6. We are surprised that it is anticipated that there is only to be an additional increase of 50,000 people living in Wellington over the next 30 years, and would encourage the city to work harder at increasing our population. We consider that Wellington needs to increase its population density more and sooner than the predicted numbers, to both increase the city's economic viability, and to also enjoy the cultural vitality and lifestyle benefits of greater urban density. We currently have a very low population density in contrast to many cities which we might look to as models for our urban environment (**Table 1**).
7. We strongly support the council's aim to "encourage growth in areas close to services, employment and good public transport" (p. 10). We also strongly support the intention for Wellington to be a compact city, containing development within the city's existing urban limits (pp. 10, 19), but we can also see the need (as Wellington's population increases) to provide more inner city recreation spaces. While the town belt is our city's "Hyde Park," a series of inter-connected urban playgrounds, and public spaces, and places will also be needed. Celebrating the intersections of streets (such as London's Seven dials) might be one way to create new place identities and increase the urban depth of our city. Interior as well as exterior public spaces could be considered, but both need to be well designed to ensure use and longevity.



Figure 1: London's Seven dials

8. We do not support greenfield development (i.e. Stebbings Valley and Lincolnshire Farm). These developments do not support the council's vision for a compact city. While we understand these developments have been consented, and that greenfield development is not desirable, a lesser evil would be to require these to be net-zero energy developments (including transport). Regardless the Architectural Centre believes that there is still capacity within the centres of the CBD/Adelaide Rd, Johnsonville and Kilbirnie to significantly increase population density, and we endorse the council adopting "incentives to stimulate development" (p. 37) to achieve higher densities in these three areas. We would also support greater density (via infill and new development) in the CBD extended out to encompass a commuter pedestrian's walking distance.
9. A comparison of the population densities of world cities makes it clear that there is huge capacity within Wellington to accommodate more people. Rather than opening up greenfield sites for development, the Architectural Centre considers that council energy needs to be directed to facilitating inner-city development, including establishing mechanisms to group land parcels large enough for

economic redevelopment. We also believe that the public promotion of high quality urban design, and apartment design are critical - through both exemplar and District Plan provisions. We do not support extending the growth spine out to Tawa. In a similar vein we wonder if the time has come when the single detached house is passed its use by date. We do not think the council should actively support the building of any more detached houses, and should only consent medium and high density developments, within the growth spine area. We strongly support council incentives for medium and high density housing in the CBD, Adelaide Road (north of Newtown), Johnsonville and Kilbirnie. Needless to say, we support the Adelaide Road Framework (p. 36).

10. An important part of our population growth will inevitable be older people. The council needs a proactive urban strategy for older people which includes inclusive urban design, improved public transport access, and better public transport infrastructure, especially bus stop design. Currently bus stops are primarily advertising props. We believe that the council has an ethical obligation to ensure that bus shelters provide protection for bus patrons from prevailing winds, and from rain. Very few bus shelters in Wellington achieve this very basic function, and you need to address this urgently.

city	population density (pop/sqkm) <sup>1</sup>
London	5,800 (2011)
Madrid	4,700 (2011)
Tokyo/Yokohama	4,400 (2010)
Barcelona	4,300 (2011)
Paris	3,900 (2008)
Stockholm	3,800 (2010)
Vienna	3,800 (2010)
Florence	3,700 (2010)
Rome	3,400 (2010)
Berlin	3,000 (2011)
Toronto	2,800 (2011)
Copenhagen	2,700 (2010)
Auckland	2,400 (2008)
San Francisco	2,100 (2010)
Sydney	2,000 (2011)
Vancouver	1,900 (2011)
Wellington	900 <sup>2</sup>

Table 1: Various population densities of world cities.

11. We also note that the diagram of defined growth areas (p. 54) would be more useful if it included current population densities. Does the growth spine currently have an even density along its length? What is the density along the growth spine that the council is aiming for? The answers to these questions appear to us to be more directly relevant to the council's strategy than the number of estimated dwelling potential. Comparative figures with the urban spaces and cities that we are aiming to emulate would also enlighten the discussion. We consider that Wellington's urban form has too low a population

<sup>1</sup> With the exception of Wellington, the population densities are taken from Demographia data - which does not include Wellington. We acknowledge different sources will often give different densities due to the urban area used, so see these figures as indicative. *Demographia World Urban Areas* (May 2014) <http://www.demographia.com/db-worldua.pdf>

<sup>2</sup> "Wellington has a population estimated at 398,000, up slightly from the 397,000 estimated in 2013. The urban area has a fairly low population density of 2,300 people per square mile, or 900 per square kilometer. The larger metropolitan area has a population of about 403,000, with a density of 750 people per square mile (290/square kilometer)." "Wellington Population 2014" *World Population Review* <http://worldpopulationreview.com/world-cities/wellington-population/>

density city and that more dense development is needed in conjunction with high quality urban design, and high quality living spaces.

### Capital City

12. We are New Zealand's capital city. There was significant work done previously by the council regarding both initiatives around the Parliamentary precinct, and work to imbue the wider city with greater awareness of its capital city status. We support long term planning (including anticipation in the District Plan) to provide a harbour connection to Parliament grounds. We also consider that processional routes from Parliament to Government House (especially the route along Lambton Quay/Courtenay Place, down Kent/Cambridge Tce and around the Basin to Government House) are important to acknowledge as part of our city's identity as the capital city and our country's constitutional link to the English monarchy via the governor general. Acknowledgement of the National War Memorial precinct (from Taranaki Street through to the Basin Reserve/Government House) as a nationally significant heritage precinct would be appropriate to formalise during the centenary of WWI (1914-1918), and of the ANZACs at Gallipoli (1915).



Figure 2: Hiroshima Memorial Peace Park; Saiki Peace Memorial Park

13. We also consider recognition of New Zealand's anti-nuclear stance, Wellington's formal status as a nuclear-free city, and the strong ties Wellington has (through Te Ati Awa/Taranaki Whanui) to Taranaki and Parihaka, and the historic imprisonment of Parihaka Māori at Mt Cook gaol in the 1870s (prior to their removal to Dunedin), could be acknowledged through a National Peace Park, especially given the international, as well as the national significance of Parihaka and New Zealand's anti-nuclear stance. Any such proposal would require collaboration and co-partnership with Te Ati Awa/Taranaki Whanui and Parihaka. Establishing and acknowledging nationally-significant sites is an important way to cement and visualise Wellington's international status as the Capital City.

### Green spaces and place-making

14. The town belt is our city's "Hyde Park." Dominating our skyline the townbelt is also an important aspect of our city's physical identity, which is easily taken for granted. The Architectural Centre considers that in addition to the protection of the town belt as perpetual green recreational space, the views to the town belt need to be identified and protected.
15. With respect to Central Area Viewshafts (<http://wellington.govt.nz/~media/your-council/plans-policies-and-bylaws/district-plan/volume01/files/v1chap13app.pdf> Chapt 13 p. 31) we note that there has been significant levels of new development in Te Aro, especially new residential apartment blocks, which are collectively increasing the average building heights of many Te Aro city blocks. This suggests to us that it would be timely to review the Central Area Viewshafts prior to more development in Te Aro. We also note that most view

shafts in Te Aro are presently from the city toward the harbour. Existing W-E views across the city to the townbelt include those along Buckle St, Vivian St, Majoribanks St, which collectively provide W-E views at both ends of Te Aro, and through its centre. We recommend the views be formalised as view shafts in the District Plan.

16. As reflected in the current Central Area Viewshafts, views to the harbour have traditionally been protected. In addition to existing District Plan Viewshafts, we strongly recommend that the District Plan, include future provision for a more direct connection from Parliament grounds to the harbour. We also urge the council to provide incentives for New World to re-organise its Chaffers/Waitangi Park site to re-establish the Kent/Cambridge Tce view shaft to the harbour, and that this intent is signaled in the District Plan.
17. We support the council's intention to "enhance and improve access to the city's natural "blue" environment" (p. 59) and see this as achieving both environmental aims as well as urban place-making objectives. We support the strategic daylighting of inner-city culverted streams (e.g. the Waitangi, Waimapihi, Kumutoto awa) as well as explicit (but not necessarily written) interpretive work to convey the cultural, historic and ecological significance of these waterways.
18. We also consider the provision of new non-green public spaces as important to our city's future development. We recommend that an inner city shared space network (p. 47) be established for pedestrians and cyclists. This network (**Figure 3**) would include: Courtenay Place,\* Dixon Street, Tory Street, Cuba St (though we note that Cuba Mall is too heavily pedestrianised to be useful for cyclists), Eva/Leeds St, Egmont St, Ghuznee St,\* Marion St, Swan Lane, Victoria St,\* and Wakefield St (between Taranaki and Victoria St)\* as an initial network. (\*= roads that could allow low speed, low volume traffic, but would need to be re-designed so pedestrians and cyclists are given priority). We consider that the Victoria Street/Cuba Street regeneration area (p. 34) would be supported by such an inner city shared space network. This shared space network would need to be documented in the District Plan's Hierarchy of Roads (<http://wellington.govt.nz/~media/your-council/plans-policies-and-bylaws/district-plan/volume03/files/v3map34.pdf>).



Figure 3: Key streets in inner city shared streets network

## Housing

19. We consider that the council has an important role in ensuring and improving the poor quality and quantity of Wellington's housing stock. Areas which we

support council involvement (directly or through working with the GWRC and/or central government) include:

- a. eliminating homelessness in Wellington
- b. improvements to tenancy law
- c. a warrant of fitness regime for rental properties (p. 55)
- d. championing accessibility and universal design (p. 55)
- e. developing incentives for retro-fitted insulation (p. 55).
- f. encouraging rainwater collection at the household/workplace level for sustainability and disaster resilience reasons (p. 58)
- g. developing incentives to decentralise power supply. By this we mean encouraging ratepayers to invest in solar panels, and incentivising applications for wind and tidal power generation. This will add to our collective resilience as well as reduce carbon emission, and work towards our aim to be a carbon zero city.
- h. green rooves
- i. sustainable building practices (p. 59), including sustainable waste management and re-use (rather than recycling) strategies



Figure 4: The Barbican apartments and Arts Centre, London

20. The document points to the CBD, Adelaide Road, Johnsonville and Kilbirnie as key locations for higher density residential development. There are of course many models to do this. One model which seems to us to be worth pursuing is that of the Barbican in London, which includes residential towers as part of its mixed use high density development. This late modernist precinct includes an Arts Centre (Gallery and Theatre) as well as cafes and public urban spaces. While being known as "council housing for the rich," the Barbican is an excellent example of how a highly desirable high density residential development might be implemented in the inner city. The Architectural Centre strongly advocates for such a single development to be constructed at the north end of Adelaide Road, and that the District Plan anticipate this. Similar developments could be appropriate anchor projects in Johnsonville and Kilbirnie. We also note (as the document identifies Karori as a key centre for growth (p. 40)), that the currently underutilised former Wellington Teachers Training College (now VUW) is a site and building whose interior could be remodelled as residential apartments resulting in a Barbican-like development. Its lecture theatres, gymnasium and performance spaces could provide community facilities which complement the residential function.



Figure x: Karori Teachers Training College

21. We realise that to achieve such developments, particularly in Johnsonville, Kilbirnie and Adelaide Rd, negotiations with numerous landowners etc. will be required. We strongly recommend that the WCC runs a series of speculative design competitions for large-scale high density residential and mixed use developments as core projects for each of these sites. We are more than happy to help with this.
22. We congratulate the council on its innovative and progressive work in relation to social housing. We consider that investment and commitment to social housing is an important aspect of a local council's contribution to its community. Despite all this excellent work, we understand that there is more need than the current housing provision. We suggest that to help assist this a council requirement for all new developments to provide (say 15-30%) social housing is needed. Affordable Housing Provisions are a requirement in many civilised places in the world. We could do this too. Examples of related housing strategies include Vancouver (which requires 20% of units in new developments to be affordable housing), Amsterdam (30%), and London (30-50%).<sup>3</sup>
23. We note that the consultation document makes no mention of homelessness. We see this as a significant omission. We strongly encourage the council to include its homelessness strategy (Te Mahana: A Draft Strategy to End Homelessness in Wellington: A strategy for 2014-2020) in its list of related council policies. We encourage the council to elaborate on homelessness as part of the housing section of this Draft Urban Growth Plan. We also consider that more detailed discussion regarding social housing is required.

### Urban Design and Heritage

24. In the last 6 years begging on Wellington's inner city streets has developed. This is both a social welfare issue and an urban design one. We do not condone the previous council's attempts to surreptitiously relocate homeless people through urban design (e.g. the redesign of Glover Park), because public space is for all of Wellington's citizens to occupy, but rather think the causes of poverty need addressing. Clearly there is more poverty etc., and central government's social welfare system is failing. How do we as a city support

<sup>3</sup> Historically London has specified 50%, a the "City of London Local Development Framework" tested rates of 30-50% ("City of London Local Development Framework" (May 2010) <https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/local-development-framework/Documents/City%20of%20London%20Affordable%20Housing%20Viability%20Study%202010.pdf>). New regulations mean that targets can be set by either % or absolute numbers (currently at least 13,200 more affordable homes per year), which makes comparisons with % less straightforward. (*The London Plan* (July 2011) p. 96 <http://www.london.gov.uk/sites/default/files/LP2011%20Chapter%203.pdf>).

these people who are not getting sufficient welfare assistance from central government? What is the council doing to help these people?

25. We only partially support the strategic land acquisition plan for the "development of the city's transport network" for public transport and cycling (p. 34), because successful cycle, bus and tram networks have been established in many cities with more restrictive space than Wellington (i.e. much of Europe). We would however point to the need to have a strategic land acquisition plan to meet existing and future needs for inner city parks and recreational spaces to support increased CBD density, the re-establishment of important but blocked view shafts (e.g. Kent/Cambridge Tce to the harbour), and to forge place-making. A smart land acquisition plan will build on the city's precinct characteristics ensuring variety and richness of city spaces, creating urban depth in our city fabric. The work of the Wellington Sculpture Trust has been heroic in beginning ways of uncovering new urban identities. We wonder though if a shift in scale is needed, and that rather than primarily focusing on the location of sculptural objects within existing places bolder work is needed to be done in order to create a greater variety of urban space and place. New and existing spatial networks (e.g. the historic borough centres) might provide the civic identity infrastructure which enables Wellington to be less two dimensional as a city. A more layered and dense urban fabric will create a more exciting and less exhaustible urban experience, one which citizens, visitors and tourists will want to explore and return to, rather than feeling that they "know" Wellington in less than an afternoon. Increased population density will also force the city to be more complex and more interesting.
26. We also support the continuation of the laneways programme, but caution that aesthetic diversity is important. We don't want all lanes becoming aspirationally middle-class and anemically gentrified (like Chews lane). Don't kill character, and remember that asphalt is a great and robust footpath material - especially in the rain whereas the council's peach-coloured paving is not, and can be quite slippery. The upgrading of Opera House Lane is a good example of improving the environment while not quashing idiosyncrasy.
27. In addition to the broader organising desires of urban design, we also encourage the council to look after its individual buildings and urban spaces. Council-owned buildings, such as those in the Basin Reserve (e.g. Vance Stand and Museum Stand), have not suffered from civic TLC. These buildings are an embarrassment. The council must be a leader in demonstrating care for the built environment as champions of the very behaviour they urge from ratepayers; not leading villains of deferred maintenance. In a similar vein, footpath and the general pedestrian area around the Basin needs basic maintenance as a minimum - though we don't encourage the sad and austere "plonked planter-look" that has replaced the street-sculpting shops, once at the corner of Kent Terrace and Ellice St.
28. The statutory requirement for listing heritage areas and places in the District Plan means that many heritage sites are formally recognised, but we are concerned that many sites with heritage value may not be acknowledged or protected because of the under-resourcing of heritage both at the WCC and Heritage NZ. We note that extreme difference, as an example, of the number of council officers charged with heritage roles at the WCC and the staff numbers at Auckland Council. In addition to more resourcing at a staffing level, we also consider that some kind of mechanism which acknowledges the systemic issues with respect to heritage recognition is implemented. We also strongly encourage the council to better support heritage through addressing its staffing levels.



29. While Wellington has a substantial urban grid inherited from the nineteenth-century, we also enjoy the distinctive Victorian boulevard of Cambridge and Kent Terraces and the Canal Reserve, with its (now conceptual) link to the harbour, the culverted Waitangi Stream beneath ground level, and the Basin Reserve, which - like the names of some of its neighbouring streets (e.g. Rugby St (east) was formerly Dock St) - refers to another body of water. We believe that the historic significance of this distinctive nineteenth-century town planning needs to be formally recognised in the District Plan. Its street structure is unique to Wellington and an important part of our urban fabric and city identity. The presiding Queen Victoria statue (originally in Post Office Square) seemingly reinforces the compelling form of this nearly 200 year street plan. We disagree with the document that improvements in this area are dependent on any development at the Basin Reserve. Instead we consider that some judicious tree trimming, and the relocation of the Greek memorial to a more organically-shaped part of the city, would better enable the severity of the canal geometry to be read. We also support greater building density along the street frontages of property would be advantageous, perhaps with the less formally structured aspects of the car yards fronting Hania Street.
30. The consultation document (under heritage) refers to the need to reflect the principles of Te Tiriti o Waitangi, and we are not really sure what "reflect" means in this context. We would encourage more assertive wording - perhaps the council's work need, to "enact" the principles of Te Tiriti o Waitangi?
31. We appreciate the council's acknowledgement of tangata whenua and mana whenua, but wonder if there are additional ways Wellington could demonstrate engagement with Māori heritage and culture. Perhaps a short-term aim might be that 80% of Wellingtonians know and can pronounce the names of local iwi? Perhaps the council should have a target regarding the % of fluent te reo Māori speakers in Wellington? We also wonder if there is some way of ascertaining the level of local knowledge about Wellington/Poneke/Te Whanganui a Tara.
32. Our city streets reflect an imbalanced history, and possibly not an accurate heritage for our twenty-first city. The dubious directors of the New Zealand Company (e.g. Abel Smith, Boulcott, Buckle, Courtenay, Ingestre, Ellice, Lambton, Majoribanks, Molesworth, Nairn, Pirie, Thompson, Vivian, Wakefield, Webb, and Willis) have comprehensively infiltrated our streetscape. We are not sure if a complete replacement of these names is the best plan (the New Zealand Company is after all part of our collective history - for good or bad). Perhaps the double-naming of Matiu/Somes Island (which Pākehā named after the New Zealand Company's Governor (Joseph Somes)) provides an example. Regardless we consider, almost 200 years on, that it is time to review our street names to better reflect the heritage of our city.

### **Transport**

33. We are at a point where many productive things have been done in Wellington to support active sustainable transport and public transit, but we believe it is time that our city drew a line in the sand - so to speak - and committed fully to active and sustainable transport modes - in practice, rather than just in policy. It is time to:
- a. remove all car parking from arterial roads
  - b. develop a cycle-pedestrian shared space network throughout the CBD
  - c. implement public transport fare transfers - it is crazy we don't have this, especially now the Snapper enables the capacity to programme this.

- d. develop a system of route legibility; a design palette and conventions which clearly indicate which transport mode is prioritised in specific areas. Legibility is often best using more sophisticated design strategies than signage.
- e. build cycleways from the CBD out
- f. introduce dropped kerbs to maximise the potential of cyclists to best utilise available footpath and road space.
- g. use simple techniques such as painted roads to increase the awareness of, and explicitly allow space for, different transport modes (e.g. pedestrians and cyclists)
- h. traffic light timings (e.g. with the use of barn dance crossing) can prioritise pedestrian and cyclists. Similarly traffic light timings can penalise specific transport modes. We note that the current traffic light timings at the corner of Ghuznee and Victoria Streets sends a clear signal to pedestrians that they are at the bottom of the transport hierarchy.
- i. commit to providing light rail, initially from the railway to the Embassy Theatre/Basin, and in the long term along the full length of the growth spine. When Nice, for example, replaced 4 bus lines in 2007 with its single-line tramway, it had a population of 350,000 approx. The number of passengers has grown from 70,000 per day in 2008 to 90,000 in 2011. What we are suggesting as an initial step is significantly less ambitious than this.

We can achieve 80% of all of non-freight trips within Wellington city being taken by active and sustainable transport within 10 years - if there is political will, and only you, as our councillors, can achieve this for our city.

- 34. The focus of public transport is the existing PT spine, which has in part been shaped by the pinch points of our topography. The Architectural Centre considers that it is time that a secondary spine is developed (possibly along the south coast) which picks up suburban terminals (e.g. Island Bay, Houghton Bay, Breaker Bay/Moa Pt), and provides better connectivity. A route from Owairo Bay through Island Bay, Lyall Bay, Breaker Bay, Seaton, Miramar and Kilbirnie might both support the growth of Kilbirnie as an employment/residential centre and provide better public transit connectivity between the whole of the south coast and the airport, and simplify west-east journeys from the south coast. An alternative strategy might be to advance fare transfers and align route timetables (e.g. no. 3, 4, 6, 30, 32 etc.) to enable seamless connections, and extend routes where needed to provide connection around the whole of the south coast.
- 35. The document acknowledges that "[p]ublic transport is a considerably more efficient mode for moving people than the private car" (p. 47), and public transit is acknowledged as an effective way to reduce congestion - if it is significantly more appealing than the private car. We continue to think that a light rail route from Wellington Railway Station to the airport is the best long term public transit solution, and strongly support "an extension of the rapid transit network spine to the airport" (p. 37). Until that time significant work will be required to achieve a mode shift to PT, and the gains will be minor. We suggest the following:
  - a. free peak-time PT (to reduce the number of cars on the road) and attract people to PT
  - b. a requirement that city and regional councillors are provided with Snapper cards, and use public transport for council business. We believe this policy would be the best way to incentivise improvement to public transport.
- 36. We do not agree with replacing electric trolley buses with hybrid diesel buses, and we disagree with the comment regarding taxi parking: "it is not possible to

provide parking spaces for all taxis so our focus has long been to provide sufficient adequately located taxi ranks in high demand areas" (p. 47). We are perplexed as to why you would provide taxi ranks, when effort should instead be put into access to PT. Would it be possible to effectively restrict taxis to a park'n'ride form of transport - perhaps at either end of the Golden Mile?

37. We are encouraged by the council's stated commitment to cycling, though (as noted above) the significant advantage existing for the private car appears not to be fully understood. If the council is sincere about wanting mode shifts to occur toward pedestrian, cyclist and public transit, then significant thought and finances need to be directed to these transport modes, until the city transport infrastructure reflects the stated hierarchy of "Our transport strategy [that] recognises in priority order: pedestrians, cyclists, public transport, moving freight and private vehicles." (p. 50). What this order of priority promises is that when private vehicles truly have the lowest priority in our transport infrastructure, then new investment *might* be considered.
38. We also understand that "Cycling is ... the most efficient form of human-powered transport" (p. 43). We understand that cycling is 3 times more efficient than walking, 5 times more efficient than taking a train and 15-20 times more efficient than driving a car. Given this it makes sense for cycling to be given the highest priority as a transport mode. We suggest that:
  - a. that a cycling network is built from CBD out (using bus zones as a way to structure the progressive provision of cycling infrastructure), and that it is designed for cyclists rather than simply accommodated into existing roads.
  - b. cycle lanes and cycle parking is prioritised over car parking (p. 43).
  - c. all CBD intersections have bike boxes
  - d. there are improved cycling facilities at the airport (i.e. plausibility of long term parking)
39. We are not convinced that cycling improvements from the eastern suburbs to the central city will be delivered by the RoNS projects (p. 43), because we believe that the coastal route will be preferred until the difficulties of cycling through the CBD are fully resolved. We believe the issues with west-east and east-west cycling are related to the CBD impermeability, not the route to or through the Basin Reserve. We also do not concur that "[t]he most important issue is separation from faster moving vehicles" (p. 43) as we understand that traffic calming and reduced car speeds (even if faster than cycling speeds) can be more effective in providing an appropriate cycling environment than the separation of cyclists from motorists.
40. Currently the inner city has severe issues because of block impermeability. This has occurred in particular as a result of the reversing of Vivian St's one-way, which has meant that there is no roadway for cars or cyclists travelling westward from Cambridge Tce from the Basin, until Courtenay Place. We consider that addressing this is a high priority. This has contributed to the underutilisation of Cambridge Tce, and the forcing of cyclists to the waterfront, regardless of their (workplace) destination. Other urban impediments include the Karo Drive intersection with Willis Street which is particularly ungainly for cyclists and pedestrians. To begin to address this, the Architectural Centre proposes:
  - a. the reversing of Jessie St's one-way, and rethinking its intersection with Taranaki St to facilitate right turns. (We support the proposal to "Review the one-way system" (p. 50)).

- b. negotiations with the Taranaki Street Methodist Church to enable low volume (traffic-calmed) traffic through between Holland St and Taranaki Street
- c. the extension of Barker Street to Tory Street
- d. formalising existing pedestrian/cycle routes, which are used but often involve trespassing (e.g. routes from Jessie St through to Vivian St). We consider protection of these routes important prior to further residential development to prevent existing routes being built out.
- e. extend Garratt Street through to Victoria Street
- f. redesign the Karo Drive intersections to reduce pedestrian and cyclist travel times.
- g. narrow Wakefield St/Jervois Quay to reduce the barrier between our city and our harbour, and reroute commuter traffic from the waterfront to the inner-city bypass (ICB).
- h. remove car parks from all arterial roads (e.g. Willis Street, Taranaki Street)

In addition we believe that the city needs more infrastructure, such as bike parks and workplace showers, to encourage cycling. We note that free use of the bicycle repair tools and tyre pump outside the central library is a good start.

We also strongly encourage the council to ensure that its transport principles for the CBD are replicated in the Johnsonville and Kilbirnie Town Centres (e.g. discouraging commuter parking (p. 51), prioritising pedestrian, cyclist and public transit over the private car (p. 50)), as we believe this will increase the viability of these centres as liveable and vibrant places.

One remaining issue which we consider to be of critical importance is school traffic, and the need to significantly increase the percentage school students who walk, cycle or bus to school. Directly addressing this will reduce peak-hour traffic, and establish transport norms in our city's future.

### **Digital Strategy**

We are surprised that the consultation document does not comment on digitally-related issues and the potential for new technology and new media to contribute to long-term civic form, identity and development. E-commerce, e-commuting, e-freight could have significantly different urban outcomes (especially in relation to resource use), than currently dominant ways of working, and commuting. Comprehensive free wifi across the city might broaden the commuter peak-time. E-freight (especially with the increasing viability of 3D-printing), might significantly reduce freight demand, in the way that e-mail has gutted the viability of mail as a business. The traditional pressures on road space might not be as time sensitive as currently is the case.

The use of smart phone apps to make car parking more efficient has been demonstrated (p. 51). Similar applications make renting (or sharing), rather than owning, a car viable (e.g. Melbourne's car share scheme: "goget" <https://www.goget.com.au/>), and can provide real-time traffic information to reduce congestion and make the best use of the whole of the roading network. The efficiencies possible with such technology suggest more sophisticated ways (via information sharing) to provide roading capacity for different modes than simply increasing physical space. They also suggest that if the uptake of these technologies coincides with physical reduction of allocated road space, a specific mode might not experience reduced levels of service.

We strongly support the council's intention to "[f]acilitate the provision of a car share scheme" (p. 50), and suggest that managing competing roading interests might be

in part ameliorated by a shift from privately-owned to rented or shared vehicles, in addition to outright mode shifts.

**Conclusion**

Thank you again for this opportunity to comment on this Draft Urban Growth Plan. If you have any questions please do not hesitate to contact me.

Yours faithfully



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