

15 May 2018

Our 10-Year Plan
Tō mātou mahere ngahuru tau
Wellington City Council
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Re: Our 10-Year Plan | Tō mātou mahere ngahuru tau

This submission is from the Architectural Centre. We are an incorporated society dating from 1946, which represents both professionals and non-professionals interested in the promotion of good design.

Overall the Architectural Centre supports this 10-Year Plan. We have the following comments to make:

Climate Change

1. The Architectural Centre believes that **reducing carbon emissions** and moving to a **zero-carbon economy** needs to be a separate priority area distinct from the mitigation and adaptation measures more typical of building resilience, in order to emphasize its importance. We believe that this must be the first priority until we have a net zero-carbon city. We also believe a more proactive stance with respect to embodied energy is needed, including the council:
 - (a) facilitating the reuse existing buildings (especially, but not exclusively, heritage buildings).
 - (b) confronting our throw away culture by proactively supporting industries and companies that:
 - (i) repair things.
 - (ii) sell products with sufficient life to recoup the embodied energy used to produce them.
 - (iii) sell products that can be repaired in Wellington.

Resilience and environment

2. We consider both social and environmental resilience should be addressed under this category. We support council intentions regarding:
 - (a) "reducing waste ... strengthening core infrastructure such as pipes and heritage buildings" (p. 12), and anticipating rising sea levels.
 - (b) improving water storage and infrastructure, but we also point to needs regarding water quality (e.g. using swales for the treatment of stormwater). **Grey water systems** also need to be proactively supported by council regulations, and use of less toxic chemicals in sewage could enable grey water to provide a source of nutrients for composting.



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3. We note however the need for the council to get the community onboard by genuinely listening to concerns re: infrastructure projects (e.g. New Prince of Wales/Omāroto Reservoir which we understand that the Mt Cook community have raised concerns about).
4. Facilitating distributed water collections (e.g. **domestic rain water tanks**) will reduce the volume of council supply needed. We also recommend the introduction of water meters, and incentives to educate Wellingtonians regarding the preciousness of drinkable water. Currently we literally flush this down the toilet. We need to begin to transition to only using rain water and grey water systems for non-drinking uses.
5. With respect to social resilience we note our **ageing demographic**, as well as the increasing **numbers of Māori and Pacific** in the younger population. We believe specific strategies are needed, for example, in relation to urban design and requirements for universal design in buildings to better reflect the needs of our changing demographics. Creating **inclusive public spaces** that anticipate this new demographic will also better facilitate civic participation. This would include a range of responses from increasing the visibility of tangata whenua to investing in bus stop designs that better protect from inclement weather and facilitate public transport use for the elderly at all times. We also note that the funding of all large infrastructure projects needs to be mindful of avoiding inter-generational inequity with respect to economic consequences. We also consider that provision for **suburban community centres** which provide distributed infrastructure for social and environmental resilience to be important.
6. In relation to the other projects you have signalled:
 - (a) we support the installation of **building accelerometers** in Wellington buildings to better increase our capacity in post earthquake contexts. We also note the need for resilient information post earthquakes, for example electronic building records accessible to first response teams and engineers, including structural drawings for heritage buildings.
 - (b) we support **transport resilience** and note that this is a modal issue as much as, or more than, a corridor issue. Our understanding is that following the Canterbury earthquakes bikes enabled transport resilience because of their route flexibility and lack of need for fuel infrastructure. **Increasing the number of cyclists will increase post disaster transport resilience.**
 - (c) we support **strengthening council buildings**, and congratulate the council on the recent decision to re-use rather than demolish, the Museum Stand at the Basin Reserve.
 - (d) we support the **built heritage incentive fund**. As we have noted previously, much of the economic benefit of strengthening heritage buildings is captured by local and central government while the costs are incurred by building owners. We see any moves to rebalance this inherent unfairness is positive. We also support continued and adaptive re-use of buildings for climate change reasons because this avoids the greater use of energy to build new buildings.
 - (e) we support better **security of water supply**, and refer to our comments above in 4. regarding rain water collection.
 - (f) we support **waste management and minimisation**, and refer to our comments above regarding embodied energy and reducing our throw-away culture in 1(b), and the council facilitating re-use of building over demolition.
 - (g) we note with respect to **storm clean-up** and the increasing severity of weather events that achieving a zero-carbon city and increasing community-level capability will be important. Equally relevant is the

condition of our building stock. **Well-maintained buildings** will likely better weather such storms and be less of a load on council resources. Council incentives and penalties that support building maintenance should be explored.

- (h) with respect to the **addition of land to the Wellington Town Belt**, we also note the need to plan for **green corridors and public space** throughout the city to enable our current levels of livability to be maintained with increased residential density. We also point to the need to provide **family-friendly amenities** to make higher density living attractive to a broader demographic.

Housing

7. We support the promotion of well-designed higher density dwellings, and suggest that the council initiate public open days of exemplar higher-density housing to show the public the appeal of intensified living. We consider that there are five main issues that the council needs to address or facilitate with respect to housing:
 - (a) the provision of **social housing** and we support continued provision and upgrading of council housing - but also note heritage values of some of this stock. We consider that any council funded/subsidised housing must have net zero-emission design/operation and minimise waste, exemplifying the best practice in sustainability.
 - (b) the **difference between the market value of housing and the cost of housing**, and note that the difference often relates to the cost of money, and banking regulations, rather than simply issues of supply and demand. For this reason it is not appropriate for the council to be directly involved in the supply of housing that is not social housing, but rather lobby government to set appropriate economic drivers to lower market prices, and put energy into creating conditions amenable for housing supply, including District Plan changes to increase density, remove Building Recession Planes, remove onsite car parking requirements, and allow higher densities zoned to support centres of employment.
 - (c) addressing **homelessness** which we consider to be a key part of the council's housing strategy, and we fully support initiatives to provide for homeless people and to address underlying causes, which are usually greater than simply the provision of housing. Increasing social housing supply will be an important aspect of any homelessness strategy.
 - (d) transitioning Wellington housing stock to low and **net zero-carbon** operation. This would include all housing being insulated, triple glazed and support for solar- and wind-generated electricity. Encouraging smaller windows (i.e. code minimum) will also minimise energy (heat) loss. Related to this we note that higher-density housing has fewer external walls and ceilings directly under rooves reducing heat-loss per dwelling.
 - (e) facilitating conversion of existing dwellings and properties into multiple dwellings to create **multi-generational homes**, including to enable families to look after elderly relations.
8. In relation to the other projects you have signalled:
 - (a) we generally support the **Wellington housing strategy**, where it is not inconsistent with our comments in this submission.
 - (b) **Special Housing Areas (SHAs)** - We are aware of the negative consequences of SHAs and their ineffectiveness to provide meaningful increases in housing to date. We particularly note the poor heritage outcomes as a result of Erskine becoming an SHA; and the lack of sufficient transport infrastructure at Shelly Bay, which will make this a car-dependent enclave, undermining council rhetoric regarding a larger vision of reduced carbon emissions. We also note that the proposed

development size at Shelly Bay is significantly larger than that envisaged by the SHA resulting in a significant load on infrastructure. Any SHAs must be **located on existing public transport routes**, preferably on the future light rail route, or in walking distance to centres of high employment. We note that the planned densification of the northend of Adelaide Rd is yet to occur, and identifying the reasons for the lack of development, given its favourable planning conditions, need to be understood and to inform council initiatives for higher density development.

- (c) **Inner-city building conversions** - We cautiously support this initiative, but would prefer the council facilitate **the conversion of car parking buildings into residences** prior to commercial buildings because undermining employment locations will undermine the attraction of the CBD as a dwelling location. In this vein we encourage the council to make car parking buildings a prohibited activity in the CBD.
- (d) we support the establishment of a **Special Housing Vehicle (Urban Development Agency)**.
- (e) we support **Rental Warrant of Fitnesses**, and encourage the council to lobby government for legislation change regarding this.
- (f) we support the housing-first initiative - **Te Whare Oki Oki** - to address homelessness.

Transport

- 9. We strongly support the council facilitating **alternatives to private car useage** and do not consider that reducing congestion is a valid aim. Reducing congestion will just encourage private car use. Congestion needs to be seen productively as a disincentive for private car use. We support the **reduction of PT congestion not congestion more broadly**. As noted above in 6(b), the facilitation of cycling has transport, climate change and resilience benefits; universal design of the urban realm includes better support for the elderly to use PT, including facilities such as good bus stop design.
- 10. We very strongly support the council setting aside money now and commencing the building of a **light rail network**. Given that this will take about 10 years to effect, LRT must be anticipated and budgetted for now in order to mitigate the impact of population growth on transportation. Budgetting for LRT appears to be **a significant absence in the draft 10-year plan**.
- 11. We see potential to reduce the city's current dependence on the private car through **Travel Demand Management** including the following:
 - (a) working with employers to increase the practices of glide time and working from home.
 - (b) facilitating more suburban work locations through policy and District Plan provisions.
 - (c) reducing the number of car parks to encourage Public Transport (PT) use, and introducing a tax on privately-owned car parks.
 - (d) committing to reducing school-generated traffic during weekday peak hours and for weekend sports.
 - (e) better facilitating CBD cycling. Currently:
 - (i) WCC focus appears to have been on street lengths and not intersections.
 - (ii) discontinuous bits, rather than continuous routes from the CBD outward.
 - (iii) events on the waterfront often mean that cycling is not viable along the waterfront due to pedestrian numbers. Cycling routes through the CBD are needed.

- (iv) the most difficult and most dangerous cycling routes appear to be avoided in proposed infrastructure (e.g. Berhampore) with easy routes (e.g. Evans Bay) prioritised.
- (v) some businesses do not allow their employees to use bikes during working hours due to risk of accident, reversing this will be a test of a safe and successful city for cycling.

12. In relation to the other projects you have signalled:

- (a) we strongly encourage the WCC to **advocate for LRT** as part of the **Let's Get Welly Moving** project.
- (b) we support the proposed **Transport related initiatives**, especially the renewal of bus stops (and refer to our comments above in 5. regarding these), and implementing bus priority including bus advance signals, and dedicated bus lanes.
- (c) we support the proposal to charge for weekend CBD street car parking, but consider that full cost parking fees, rather than discounted rates, is appropriate.

Sustainable growth

13. We support planning for sustainable growth, including the provision of sufficient green space and other public space to sustain higher density neighbourhoods. Reducing private car use and starting to build a LRT network now will be critical to ensure Wellington's achievement of sustainable growth.

14. With reference to the statement that "We must make sure our planning environment is set up to support delivery rather than being a barrier" (p. 32), we stress **the importance of our planning provisions to ensure that our environment is protected**, and not compromised by development.

15. We consider that there are a number of provisions which would benefit from revision in the District Plan (DP), including DP changes to increase density (i.e. increasing residential heights to 12m and 16m on downhill edges of footprint), exclude verandahs from internal space calculations, remove Building Recession Planes, and to remove onsite car parking requirements.

We note however that:

- (a) the DP is long and complicated because it addresses complicated issues. It is easy to forget the more cumbersome planning environment pre-RMA.
- (b) an accelerated and detailed review of the DP to replace iterative reviews may have consequences for democratic participation, making it unmanageable for citizens to participate fully, meaning that people are much less likely to get involved.

16. In relation to the other projects you have signalled:

- (a) Regarding the proposal to **Extend the life of Kiwi Point Quarry** we ask the council to investigate ways to minimise the current levels of oil and metal used for road making and repair.
- (b) we support the proposed **Conservation attractions - Wellington Zoo upgrades**.
- (c) we note that with respect to **Funding of economic and tourism initiatives**, that:
 - (i) we are ambivalent regarding the need for and value of the proposed Convention Centre and Film Museum. These appear to be "band wagon" projects, like Dunedin's Stadium was, which are based on current fashion of what others are doing, rather than actual economic benefit. The financial problems of the Peter Jackson War Exhibition in the old Dominion Museum building is perhaps

symptomatic of the likely financial outcomes of building the Convention Centre and Film Museum. If these projects go ahead, the city needs to be protected from incurring others' debts. **Dunedin ratepayers are still paying off other peoples' bills incurred in the building of their white elephant stadium.**

- (ii) the civic viability of the Convention Centre and Film Museum will likely depend on appropriate mass transport such as LRT, and that the location of a nearby transport hub would be sensible. A Wakefield St route for LRT would support this.
 - (iii) the current and increasing alcoholism of Courtney Place - where arm-linked, scantily-dressed young people (and not-so-young people) sway across the footpath, dodge patches of vomit - make it a less than desirable location, and suggest that strategies might be needed to lessen the number of intoxicated bar patrons, and think about strategies to reduce pre-loading as a pre-requisite for the enjoyment of public space.
 - (iv) as publicly-funded projects, if built, the Convention Centre and Museum must be public architecture, should not have an entry fee, and be net zero-carbon buildings.
- (d) regarding the **Economic catalyst projects** see our comments above in 16(c) with respect to the Convention Centre and Film Museum. Additionally we note the importance of the council promoting local, high-value light industry (e.g. custom made fashion and joinery) as part of its economic strategy.

Arts and culture

17. We support **an innovative and risky arts and cultural scene in Wellington.**
18. We also support the retention of heritage sites representing the full range of Wellington's recent and more distant past, to provide **cultural depth in built fabric and experience of the city.** We consider it necessary for the WCC to be a leader in terms of the earthquake strengthening of heritage buildings, heritage advocacy and protection, and innovative adaptive reuse.
19. We would also like to see recognition of site-specific public art works with heritage values. These art works are vulnerable to destruction and removal, often because of a lack of knowledge of their importance, and/or because they have been covered behind false linings or layers of paint. Many were sponsored by ratepayers and were frequently designed by prominent Wellington artists and architects.
20. We consider that the **visibility of tangata whenua** is a vital part of our city, including council innovations with respect to te reo Māori and timely ambitions to be a bilingual city.
21. We support the **vibrancy of festivals and events**, and note the needs for:
 - (a) the provision of additional public transportation for large events, though long term LRT will ameliorate these needs.
 - (b) alternative cycling routes because there are ramifications for cycling in the CBD when the waterfront becomes impassable due to events.
22. In relation to the other projects you have signalled:
 - (a) we support **Investment in the arts**, specifically Te Whare Hēra artist residency programme.
 - (b) Regarding **Investment in cultural attractions** see our comments above in 16(c) with respect to the Convention Centre and Film Museum.

Thank you for this opportunity to submit on the draft 10-Year Plan, Tō mātou mahere ngahuru tau. If you have any questions please do not hesitate to contact us.

Yours faithfully



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co-presidents
Architectural Centre