

Living Streets Aotearoa



www.livingstreets.org.nz

Submission to Wellington City Council on proposed draft District Plan 2021

Contact person: **Ellen Blake**
Email: wellington@livingstreets.org.nz
Phone: **021 106 7139**
Date: **14 December 2021**

Thank you for the opportunity to comment on the draft District Plan. The District Plan needs to set out the key requirements for a walkable Wellington in the long term and there are a number of important matters that need to be included to achieve this. Our comments relate to the matters of interest from a pedestrian on the footpath perspective.

Issues and aspirations

Our aspiration for Wellington is to have a city that is a joy to get around from A to B, to be comfortable in and have a sense of belonging in our communities. This will be a city that provides quality public places and living space at a human scale and is accessible to all of us. This is particularly important as the city becomes denser and more people live in multi-unit buildings with limited private outdoor space, and as houses become smaller. People in these urban environments need quality public spaces where they can relax, do exercise, get sunshine, meet neighbours, socialise with friends, and so on. Cafes, libraries and other places are also critical places for people to enjoy a sense of community.

The city is not currently delivering that, and there is little incentive or ability for an individual developer to create or contribute to public spaces. Issues we notice currently and that need to be addressed in the new plan include:

- Blank walls, high fences and car parking creating inactive frontages and making public spaces feel less safe
- Excessive vehicle accessways across footpaths (and the footpath used as vehicle manoeuvring space by all!)
- Disconnected pedestrian infrastructure at every intersection
- Poor amenity in terms of lighting, surface, seats, shelter and shade, wayfinding
- Buildings that are inaccessible from the footpath
- Pedestrian access and shortcuts removed/ hidden/ made difficult to use
- Tall building wind and shading effects
- Lack of adequate uncluttered public space and green space
- Neglect of available small public spaces that could provide important amenity

Walkable catchments

The National Policy Statement on Urban Development 2020 (NPS-UD) states:

Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable....

(c) building heights of least 6 storeys within at least a walkable catchment of the following:

1. (i) existing and planned rapid transit stops
2. (ii) the edge of city centre zones
3. (iii) the edge of metropolitan centre zones

“Walkable catchment” isn’t further defined in the NPS-UD, but we note that what is in practice walkable depends on the street design. The Walking Plan identified that the distance you can easily walk in 20 minutes varied depending on what direction you left the central city, due to barriers such as slow road crossings and lack of short cuts. We submit that to achieve the spirit of the NPS, there need to be improvements to make highly walkable catchments particularly around the town centres and transit stops.

Walking routes also need to be public spaces – that is public road, reserve, or subject to a legal easement. This is essential to ensure that access is assured in future and walkability can be enhanced by the council and supported by community groups. For example, the Kelburn VUW campus has no public walking routes – a block 1.5 x 0.5km is entirely controlled by the university. Similarly, Johnsonville has a large shopping block where public roads have been privatised and the mall can impede passage between the main street, library and the train station.

Some of the elements needed for walkable catchments and liveable neighbourhoods are:

- access to services (supermarkets fresh food, doctors and dentist, post offices and banks,
- access to school and education
- proximity to amenities such as parks, blue and green space (every 200 metres – compared with the WHO guidelines on play spaces)
- low traffic neighbourhoods
- safer speeds, no through vehicle traffic
- narrower roads with well managed parking and traffic calming
- active interesting frontages (not a wall of garages and high fences)
- on-road bike/ micromobility access and parking (to encourage those modes and keep them off footpaths)
- highly permeable and connected walkways
- footpaths on both sides, at least 2 metres wide (including to allow for things like mobility scooters, and also to make it easier for people to avoid others who may be infected with COVID)
- noise is managed
- fence heights controlled to maintain safety and connection
- light, for both daylight and night-time light in the right places (dark sky, lit footpath)
- a focus on creating safety through building passive surveillance (windows overlooking walkways, public seating, shops that open at night), with CPTED applied in space design, with CCTV surveillance used only as a last resort in a few places
- design avoids hidden corners and dark places, orientates roads to best sun/ wind/ slope angles
- design for future as well as existing climates, particularly providing shade (street trees), permeable surfaces and water sensitive design.

New and altered buildings need to:

- have good design that provides privacy
- be accessible
- have outside spaces including for clothes drying
- include storage and bike parking
- provide green space both private and communal
- be insulated for noise and energy efficiency
- and have access to daylight.

We note that many people are concerned about multi-unit developments because they consider that they cannot provide the sort of quality, privacy and amenity that a house in its own section can. That isn't true if the units are well designed. Potentially a unit in an apartment block can deliver more privacy and less disturbance from neighbours than a typical Wellington stand-alone house close to its neighbours, if the designer focuses on achieving that. The design controls in the DP need to ensure that is a focus of the design.

An important public health measure to combat the spread of COVID-19 will be to increase the utility of well-ventilated outdoor space. In cities and towns overseas where this has been handled well, this involved widened footpaths, temporary cycle lanes, and an increase in outdoor dining options, to allow for adequate social distancing. Much of our public space between buildings is wasted – cultivating only parked cars, weeds, and litter. Many of our streets are wider than needed for vehicle movement purposes, and space could easily be re-allocated to public amenity and walking. And public spaces should not be privatised through road closures to allow increases to neighbouring properties.

We encourage planning to prepare for:

- Widening of footpaths. Social distancing will continue to be an important part of our management of COVID, even more so with the more infectious variants, and this is difficult to achieve on narrow paths. In the short term, tactical urbanism can be used to create more walking space until the budget allows a proper footpath to be created. For example, that will allow a fit walker to step out of the way of a mobility scooter or person with a pushchair
- Removal of footpath clutter, a well-signalled tougher line on footpath parking, and utilisation of roadside parking for outdoors seating can all be used to immediately increase the formed footpath space available
- Repurposing of non-disability parking for outdoor seating. This would have the triple benefit of increasing capacity for businesses, highlighting to businesses in practice that short-term car parking is not essential for business success, and maintaining the footpath space required for pedestrians and other footpath users. There also needs to be work to increase parking availability while reducing parking footprint. The Thorndon Quay argument epitomises the tendency for businesses to conflate parking places with parking availability. In the (abandoned partway through) collaborative process, Living Streets provided a range of suggestions for improving parking availability while making the area a more attractive destination for people. That included allowing booked parking for some key purposes (e.g. for the eye hospital), changing from long term spaces to more short term and drop-off/pick-up spaces, making it easy for people to visit using other modes so fewer people are competing for parking, and moving non-customer parking to other places (e.g. KiwiRail has some spare land opposite Gun City)

It is one of the unfortunate side-effects of our COVID success to date that we haven't had the chance to trial and benefit from many of these as cities overseas have.

The necessary public health measures that will help limit the spread of COVID-19 can also be used to improve the walking infrastructure in our urban areas, help protect businesses against the worst effects of the pandemic, and make our towns and cities even better in the long term.

Draft District Plan

We support in principle the provision of character precincts. It is important that our city continues to have areas that have their own distinct character.

We support in principle the provision of medium density housing zones, but it is vital that the design rules work well to ensure that these continue to provide quality private and public spaces. We can no longer allow individual developers to impose their particular vision on the community, although we also need to allow for good ideas to be supported.

We support the inclusion of a tangata whenua section setting out clearly the iwi that are mana whenua and the settlement obligations.

We support the inclusion of a section on “assisted housing” and the inclusion in that of a financial contribution provision. It is important that the city continues to have a mix of residents in all areas, without those who cannot afford to buy or rent on the market housed within normal communities, not put into “ghettos”. The mixing of people with different backgrounds, ages, family status, and socio-economic status is important to create vibrant and inclusive cities. It is in the street that mixing really occurs, so neighbourhoods with a mix of residents who spend a lot of time in public spaces will build a sense of community and inclusion, and also help reduce anti-social behaviour (e.g. the sort of behaviour that student accommodation has been generating).

Living Streets support the intention to provide housing for all, quality housing that people want to live in is the key. We have some comments on detailed sections below.

Detailed comments on provisions:

Minimum parking requirements

We welcome removal of these. The effect of people wanting to have cars that they can't store on their own property needs to be addressed through the parking policies, not by forcing houses to have parking spaces. We need to be moving to a situation where more households are car-less. Already around 30% of inner-city households are car-less, and as public transport and walking provision improve, more people will feel able to rely on public transport, cycling, walking, car share, and taxis to meet their transport needs.

Fences

We are concerned at the height of fences that are allowed as permitted activities. High fences that cannot be seen through are a public space problem. For example, some work in Auckland found that lowering fences adjoining a walkway increased the willingness of people to use the walkway, because they perceived it as safer (because they felt they could if necessary exit it onto private land). Just as blank walls should not be allowed, high opaque fences should not be allowed. The rules should allow for fences of any type up to 1m high along the boundary with public space, and fences higher than that needing to be of a material that allows pedestrians to see through from the adjacent footpath.

Noise

We aren't sure why there are three columns, with two different noise levels for night time in residential receiving environments.

It is important that public spaces, even in industrial zones, do not have dangerous noise levels. Workers in those zones need to be encouraged to walk during their breaks, use bus stops, and do other activities that would be impeded by high noise levels. We question whether 85 decibels is appropriate in a public space.

Notable trees

We strongly support provisions to protect notable trees. These are an important part of the quality of the public space and protect genetic resources. The use of native Wellington species as street trees should be supported.

Light

It is important that there is good public lighting, but it can be provided without causing dark sky issues and negatively affecting wildlife (including insects). We support the intent of the light section in that regard.

Pedestrian infrastructure

The transport section is inadequate in terms of ensuring there is good pedestrian infrastructure. It should require that any permitted activity is consistent with the NZTA guidelines. There should also be provision for requiring that significant developments that do not in themselves contribute to pedestrian amenity make a financial contribution towards that.

Design requirements

We have not been able to fully analyse the requirements, but ask that you ensure that they will ensure that the effects of buildings on adjacent public space is considered. Issues that are relevant include:

1. Ensuring that there are no blank frontages
2. Ensuring that entryways are designed so people entering buildings can move off the public space while they do that (e.g. while they find their keys or seek permission to enter).
3. Ensuring that buildings do not unduly shade public space unless they are providing a verandah. The worst possible outcome for pedestrians is that they are in a cold, wet space that never dries out in winter because it never gets any sun.
4. Ensuring that design does not generate wind problems. There are a number of buildings in Wellington that generate their own weather in the adjacent public space (Majestic Centre being one where wind speeds increase markedly as you approach the building).

Micromobility and cycle parking

We welcome there being rules relating to this. We would like to see them adjusted so that the number provided is also related to the number of carparks provided, not just to the size of the building. There should be at least one for every carpark. In the absence of good provision in places like big box retailers, they end up parked on the footpath, locked to handrails or trees in gardens, etc.

Transport section

The definition of pedestrian is different from that in transport legislation. The transport definition is more comprehensive and includes babies in buggies, running and manual wheelchair users and should be used:

pedestrian—

- (a) means a person on foot on a road; and
- (b) includes a person in or on a contrivance equipped with wheels or revolving runners that is not a vehicle

It should also be noted a pedestrian is a person and not a mode of travel. The mode of travel is 'on-foot', walking, running etc.

TR-P1 definition of vehicle excludes bicycles and micromobility so is not consistent with transport legislation

TR-P2 refers to supporting the uptake of micromobility as a mode. Does this include completely motorised versions such as scooters or is it intended to support the sustainable transport hierarchy that includes physical activity in all of the three highest priority modes and is one reason those modes are sustainable? Vehicles are constantly developed to reduce the physical activity needed to move and future proofing to ensure that physical activity is the principle supported is required in the District Plan.

TR-P3 policy is unclear in its intent and what is trying to be achieved.

TR-S3 (d) should include that parking for vehicles is not on the footpath. This is important if the DP is to support walking.

Table 9 – TR Design of driveways

The 6 metre total width of driveways at the footpath is too wide. Particularly with Driveway level 3 where the design speed is too high at 20km/h. Please consider reducing both width and speed.

TR-S4

It is unclear what the 1.8m minimum width at the road boundary refers to. Is this a footpath, if so it should be clearly stated.

Infrastructure

The definition of 'well functioning urban environments' should include mixed uses that support daily requirements, such as fresh food shops, and other services within a 15 minute walk catchment.

INF-P9 definition of upgrade transport network could be taken to mean increase the vehicle carrying capacity of roads. It should instead support sustainable active modes.

Table 1- INF

The minimum width of footpath on any road should be 2 x 1.8 metres and not 1.5metres. If it is not possible to make a road with this width footpath it should be a controlled or discretionary activity.

It appears that roads are treated as elastic with the ability to increase width depending on location. Instead vehicle space should be limited on all roads to support desired mode shift. Rural roads in Wellington City should still have dedicated pedestrian space, particularly in areas that have been identified for further development. Shared paths should be a controlled or discretionary use in all cases.

INF-S19

It is unclear where these accessories are to be located. Vehicle accessories should be located on the road and not on the footpath.

We would like to be heard in support of this submission.

About Living Streets

Living Streets Aotearoa is New Zealand's national walking and pedestrian organisation, providing a positive voice for people on foot and working to promote walking-friendly planning and development around the country. Our vision is "More people choosing to walk more often and enjoying public places".

The objectives of Living Streets Aotearoa are:

- to promote walking as a healthy, environmentally friendly and universal means of transport and recreation
- to promote the social and economic benefits of pedestrian-friendly communities
- to work for improved access and conditions for walkers, pedestrians and runners, including walking surfaces, traffic flows, speed and safety
- to advocate for greater representation of pedestrian concerns in national, regional and urban land use and transport planning.

For more information, please see www.livingstreets.org.nz.