

Living Streets Aotearoa



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Submission to Wellington City Council on proposed District Plan 2022

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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 the perspective of a pedestrian on the footpath.

Issues and aspirations

Our aspiration for Wellington is to have a city that is a joy to get around on foot, with public spaces that are attractive and meet people's needs, and urban form that encourages people to feel a sense of belonging and get to know their neighbours.

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:

Active edges

Too many buildings have blank walls, high and solid fences by the footpath, or their frontages are dominated by spaces such as carparks. These make the footpath walk far less attractive, and often reduces access to refuges, making the spaces feel unsafe.

The same problem is seen with shortcuts, where the edges often have no obvious exits (because of high and solid property boundaries) and there is no surveillance. The result is that these are less likely to feel safe for vulnerable walkers, particularly at night. There is good research showing that use of these spaces is far lower than spaces that are adjacent to properties with low or porous boundary structures.

High and solid structures between adjoining properties can also reduce safety and community building.

Effects of development and roads on footpaths

There are often excessive numbers or width of vehicle accessways across footpaths, and footpaths are often modified to suit driveway use rather than footpath users (gouged out). Often the vehicle access is arranged so that footpath need to be used for vehicle manoeuvring, including in some cases vehicles driving up a footpath to access the private parking space.

During construction, it tends to be the footpath that is lost, and WCC is not ensuring that effective pedestrian provision is maintained through the construction stage, including for those with wheelchairs, suitcases, etc.

The pedestrian network is disconnected at every intersection, with often poor connections. Roundabouts are particularly problematic for pedestrians. Crossings are often put where that minimises effects on traffic rather than to ensure a direct pedestrian route. Crossing systems are not designed to make the pedestrian journey seamless (e.g. they may require the pedestrian to wait twice, as at the Basin Reserve crossing in Kent/Cambridge).

Shortcuts

One of the most important features of a well design city is a complete pedestrian grid, with small block sizes. This does not mean there can't be cul-de-sacs for cars (particularly given Wellington's topography), but shortcuts for pedestrians and retention of public street space is vital.

Parts of the grid are missing. Sometimes this is because of topography, sometimes because of poor past decisions during subdivisions, sometimes because it has been subsequently lost. For example, none of the streets through Victoria University's Kelburn campus are public land, so there is a block 1.5 km x 0.5 km with no guaranteed public walking access. Similarly, the streets that buses use to get to Johnsonville Railway station are no longer public streets. The DP must ensure that the grid is restored and enhanced at every opportunity. The Johnsonville mall developer argued that providing pedestrian through access was "contrary to our business model". The DP needs to ensure that it is the needs of the public that take priority.

Even where there is a public accessway, these are not always visible or signposted. Sometimes there is pressure from adjacent landowners to not have them made visible to the public or formed. The DP needs to be clear that public access is a far higher priority than privacy.

The DP also needs to ensure that private vehicle use on pedestrian accessways is avoided. We have seen a number of cases where private property owners have requested driveways along what are currently pedestrian only shortcuts. This significantly reduces pedestrian service levels and amenity of the space.

Public amenity

The city suffers from poor quality public spaces in terms of lighting, surface, seats, shelter and shade, wayfinding. It is important that the overall public space delivers amenity, rather than there just being reliance on a few spaces that get focused design work. Every available public space must be treated as valuable and made usable. Even a tiny space can accommodate a seat or plant or artwork.

Tall buildings around spaces are creating shade and wind problems. For example, there are significantly different wind conditions near the Majestic Building compared to higher up Boulcott St, and Terrace Gardens has few non-shaded areas. In any future developments, the effect on adjacent public spaces needs to be addressed.

Many public spaces are cluttered by poles, signs, café tables, bike parking infrastructure, and so on. It is vital that the DP ensures an adequate uncluttered width of footpath, rather than treating an unusable part of the footpath as contributing to provision. New infrastructure should not be located in footpath space.

Accessibility

There are significant accessibility issues in Wellington, including to buildings and public spaces.

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 – based on 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 and other future diseases 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 transfer of land to neighbouring properties.

We encourage planning to prepare for:

- Widening of footpaths. This is vital to allow these to handle likely increased pedestrian numbers, use of devices (e.g. mobility scooters), social distancing, and use of footpaths as meeting and socialising spaces. 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. The DP and bylaws and enforcement need to work together to deliver a walkable city.
- 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)

Proposed 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. It is also important to retain, where possible, the context for some of our historic buildings (e.g. Katherine Mansfield House).

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 – those who cannot afford to buy or rent must be housed within normal communities, not put into “ghettoes”. 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 can occur, 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 supports 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 (or equivalent standard). 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 e-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. We also note that while anyone can walk (or use a wheelchair) not all people can use scooters and similar devices. Walking is also a far safer mode.

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.

The INF-P9 definition of upgraded 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 1.5 metres. 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. Additional vehicle lane width or number has negative effects – encouraging use of the car and creating induced traffic, encouraging higher vehicle speeds, making road crossing more difficult for pedestrians. In contrast, wider pedestrian spaces have major positive benefits – encouraging walking, providing space for other public purposes, reducing the risk that temporary intrusions (e.g. construction sites) will impede pedestrians, etc.

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. For example, Takapu Road is a very dangerous road for cyclists and pedestrians, but has an increasing population and provides access to a regional park. While it may not be feasible to provide a footpath, there is space to provide improved shoulder areas allowing much of the walking journey to be out of the vehicle lanes.

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.