

Submission on publicly notified proposal for policy statement or plan
Clause 6 of Schedule 1, Resource Management Act 1991

To Wellington City Council

Name of submitter: Living Streets Wellington

This is a submission on proposed change 72 Residential Review to the Wellington District Plan

Good urban design is an essential contribution to the walkability of a city - to make the streets attractive places to be, to ensure that walking routes are direct and unimpeded by barriers such as difficult road crossings, and to ensure that most daily journeys (e.g. from homes to shops, schools and workplaces) can be done on foot, or by a combination of walking and public transport.

Living Streets therefore supports the proposed changes that will provide for a greater proportion of residences to be within walking distance of public transport hubs and town centres (i.e. containment and intensification policies such as those under objective 4.2.1), provided these continue to be supported by policies on character retention and appropriate design.

Decision requested:

- **Retain objectives, policies and rules that encourage containment and intensification of areas close to public transport hubs and town centres, and policies to ensure that intensification results in developments which are in keeping with any special character of the affected areas, and a high quality urban townscape.**

There is a need for the district plan to go beyond this, however, and more actively recognise and provide for the promotion of active modes and public transport use as an alternative to cars. The district plan changes proposed do not adequately reflect recent changes in approaches to sustainable transport, and progress in travel demand management in Wellington, including the GWRC TDM plan, and initiatives such as travel planning in workplaces, car sharing, etc. We note that it has been difficult to get sustainable transport and TDM addressed effectively in recent RMA cases, such as the Indoor Sports Centre and Johnsonville Mall cases, in part because the provisions in the district plan are too general and weak. The requirement for new developments to have off street parking, without taking into account access to public transport and TDM measures in place for the development is particularly concerning.

Decision requested:

- **Add a new policy under objective 4.2.5, to read "Facilitate travel demand management, the use of active modes, reductions in car ownership, and the effective operations and increased use of public transport. *Urban design and the design and operation of individual developments can affect people's transport choices. Implementation of the district plan will aim to ensure that developments which have the potential to generate increased car use are subject to conditions to counteract that potential, and that the overall development of the city will facilitate and encourage the use of more sustainable modes, particularly active modes.*"**

- **Add in 4.2.6.5 "An important aspect of infrastructure is the transport system. Greenfields developments should be designed so that residents can readily use active modes to access public transport networks, and traffic generation is avoided."**
- **In 4.2.7.6, change the third matter to be considered by replacing the second sentence with "Council seeks to ensure that centres do not generate additional traffic, or demand for parking in adjacent streets. This might be achieved by the provision of parking on site, travel plans that achieve high levels of active mode and public transport use by staff and/or visitors, or other measures."**
- **In 4.2.12.4, change the first paragraph by adding at the end "Council recognises that travel demand management measures must be supported by district plan policies, to encourage households to reduce car ownership and instead use public transport and active modes, or car share/car hire services for journeys that require a car. Given that, it is not necessary for all dwellings to have car parking." In the second bullet under matters to consider, add the words "including matters such as the presence of an effective travel plan".**
- **Delete the standards that require all buildings to have car parks and add standards requiring all non-residential buildings to have cycle racks.**

Most walking in Wellington occurs on footpaths that lie between roads and private properties. It is vital that these areas are fit for their purpose. Too often, pedestrian use of footpaths is impeded by either encroachments into that space that narrow the available footpath, or by the path simply being too narrow for the volume of pedestrian traffic. The footpath is frequently modified to make vehicle crossings easier, at the same time making the use by pedestrians more difficult. And vehicle crossings themselves pose a risk to pedestrians and can affect the pleasantness of the walkers journey. It is therefore vital that there continue to be strong limitations on encroaching activities and vehicle crossings. We note that most policies relating to this refer to townscape, which is defined as the visual appearance from a distance. There is less emphasis on the functioning of the footpaths themselves.

In addition, the streets make as big a contribution to the attractiveness and workability of the city than the buildings. A very large proportion of the land in the city is taken up with roads and associated spaces (perhaps as much as 50% in some areas). It is these spaces between buildings that shape urban form; they are the place where much casual socialising happens (or could happen if the spaces were well designed), thereby generating a sense of social cohesion and reducing anti-social behaviour; they provide places for people to eat, rest, exercise, play, talk, meet, move, interact. Most of our streets are no longer able to perform any function other than providing a route for cars and a place that pedestrians move through as rapidly and carefully as possible because they are unpleasant and unsafe. From an urban form and amenity perspective, they are a blight on our city, acting against the efforts being made to preserve the character of neighbourhoods and carry out beautification projects. Our historic suburbs are only lovely if you can keep your eyes away from the roads and block out the noise of traffic. The council is beginning to talk about shared streets that are designed to be attractive and friendly public spaces that meet a wide range of needs, but the district plan does not adequately reflect this approach to road spaces. All new developments must help to undo the negative effects of decades of abuse of this core public land.

Decision requested:

- **Change policy 4.2.3.8 to read "Control the siting and design of structures on or over roads to promote townscape improvements and pedestrian amenity"**
- **Add to that policy a new paragraph after paragraph 2 to read: "Control will also be maintained to ensure that any structures on or over roads contribute to and do not detract from the usability, actual or perceived security, and attractiveness of relevant pedestrian routes"**
- **Add a new definition for "residential amenity" that states that it includes the usability, actual or perceived security, and attractiveness of pedestrian and cyclist facilities, including those on public and private land.**
- **Add a new definition to clarify that "neighbouring properties" includes neighbouring legal road and other public lands.**
- **In policy 4.2.6.2, add references to pedestrian facilities design guidelines and standards, alongside the subdivision design guide.**
- **At the end of policy 4.2.6.2, add the words "and the facilitation of uptake of active modes".**

Walkability also relies on their being appropriate routes. People are less like to use active modes for short trips if the route they have to take is unnecessarily long (because there is no direct route on public land), or perceived as unsafe or uncomfortable (e.g. through narrow alleyways surrounded by high blank walls and fences). This issue is not adequately addressed in the policies. We note the recent case of Johnsonville Mall, where there had been historic loss of streets across the block, and the new development would remove informal access across the site, and make the route from the adjacent suburbs to the railway station far longer. The provision of land to recreate the streets should have been a condition of the development, but wasn't provided for in the district plan.

Decision requested:

- **add to 4.2.3.2 a new matter to be considered: "the extent to which the proposal contributes to or detracts from existing (including informal) pedestrian routes and pedestrian amenities.**
- **add to 4.2.3.5 a new factor that open space can help to: "Enhance the usability, actual or perceived security, and attractiveness of adjacent pedestrian routes"**
- **add to 4.2.3.5 a new requirement for any application to reduce open space "The change in open space proposed will not adversely affect the usability, actual or perceived security, and attractiveness of adjacent pedestrian routes"**
- **Add to 4.2.3.8 in paragraph 3 reference to impacts on public access to and from the coast.**
- **Add to 4.2.3.8 in paragraph 4 the words "and pedestrian amenity" after "the townscape".**
- **In 4.2.3.8, add a new matter to be considered when assessing an application to build on legal road, to read "Whether the application would have an adverse effect on existing or future usability, actual or perceived security, and attractiveness of pedestrian facilities within or adjacent to the legal road"**

- **Ensure that there are provisions (policies, rules and standards) that allow the council to require developers to contribute land where that is needed to provide improved access across large blocks, or where for topographic reasons public access across the city is adversely affected by the lack of an access route across the relevant land.**

We wish to be heard in support of our submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

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Date

27 November 2009

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Submission on publicly notified proposal for policy statement or plan
Clause 6 of Schedule 1, Resource Management Act 1991

To Wellington City Council

Name of submitter: Living Streets Wellington

This is a submission on proposed change 73 Suburban Centres Review to the Wellington District Plan

Good urban design is an essential contribution to the walkability of a city - to make the streets attractive places to be, to ensure that walking routes are direct and unimpeded by barriers such as difficult road crossings, and to ensure that most daily journeys (e.g. from homes to shops, schools and workplaces) can be done on foot, or by a combination of walking and public transport.

Living Streets therefore supports the proposed changes that will provide for viable town centres with a mix of uses, serviced by good public transport services.

Decision requested:

- **Retain objectives, policies and rules that encourage the development of viable town centres, with streetscapes that will make walking comfortable and attractive, and serviced by good public transport.**
- **Retain objectives, policies and rules that ensure that developments within town centres do not have adverse effects on the walkability of the centre (including relating to the creation of wind conditions, reduction of a sense of security, encroachment into footpath space, etc).**

There is a need for the district plan to go beyond this, however, and more actively recognise and provide for the promotion of active modes and public transport use as an alternative to cars. The district plan changes proposed do not adequately reflect recent changes in approaches to sustainable transport, and progress in travel demand management in Wellington, including the GWRC TDM plan, and initiatives such as travel planning in workplaces, car sharing, etc. We note that it has been difficult to get sustainable transport and TDM addressed effectively in recent RMA cases, such as the Indoor Sports Centre and Johnsonville Mall cases, in part because the provisions in the district plan are too general and weak.

In addition, the streets make as big a contribution to the attractiveness and workability of the city than the buildings. A very large proportion of the land in the city is taken up with roads and associated spaces (perhaps as much as 50% in some areas). It is these spaces between buildings that shape urban form; they are the place where much casual socialising happens (or could happen if the spaces were well designed), thereby generating a sense of social cohesion and reducing anti-social behaviour; they provide places for people to eat, rest, exercise, play, talk, meet, move, interact. Most of our streets are no longer able to perform any function other than providing a route for cars and a place that pedestrians move through as rapidly and carefully as possible because they are unpleasant and unsafe. From an urban form and amenity perspective, they are a blight on our city, acting against the efforts being made to preserve the character of neighbourhoods and carry out beautification projects. Our historic suburbs are

only lovely if you can keep your eyes away from the roads and block out the noise of traffic. The council is beginning to talk about shared streets that are designed to be attractive and friendly public spaces that meet a wide range of needs, but the district plan does not adequately reflect this approach to road spaces. All new developments must help to undo the negative effects of decades of abuse of this core public land.

Decision requested:

- **Amend policy 6.2.5.1 to move from a multiple modes approach to a traffic demand management approach. We would suggest that the policy read “Ensure that activities and developments are designed to be accessible by active modes and public transport, and that the developments and activities incorporate design features that actively encourage and facilitate the use of those modes.” We do not believe it is necessary to require that developments be accessible by car – it may be entirely appropriate for a development to be only accessible by active modes (e.g. a development on a rear section with only a footpath connecting it to the streets).**
- **Add an additional policy after policy 6.2.5.1 to read “Ensure that activities and developments that have the potential to generate significant levels of traffic incorporate design features and/or contribute to other activities so that traffic generation is minimised, and the use of public transport and active modes actively facilitated and encouraged. *It is important that travel demand management activities are incorporated into developments at the design stage, in order to prevent unnecessary traffic generation resulting. Retrofitting TDM measures can be more difficult, and poor design will actively generate unnecessary traffic. The sorts of activities that might be required in conditions include the development of travel plans, reduced provision of car parking, providing facilities for cyclists and walkers, providing enhanced public transport access (e.g. covered walkways to bus stops), providing real time information, etc.***
- **Policy 6.2.5.5 does not go far enough in recognising that problems with pedestrian networks should be corrected when major developments occur. It should be adjusted to read “...and where opportunities arise or there are significant network deficiencies, create...” There should be related provisions (rules and standards) that allow the council to require developers to contribute land where that is needed to provide improved access across large blocks, or where for topographic reasons public access across the city is adversely affected by the lack of an access route across the relevant land.**
- **Add a new standard to require that where parking is provided for vehicles, at least an equivalent number of spaces is provided for bicycles, with cycle racks.**
- **There should be explicit provisions that ensure that in consideration of amenity values, townscapes, etc, the effects of developments on the adjacent roads are considered. This should include provisions requiring major developments to contribute to improvements in roads that allow them to be changed from ugly traffic routes to attractive shared public spaces.**

We wish to be heard in support of our submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

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