
ORDINARY MEETING

OF

CITY STRATEGY COMMITTEE

SUPPLEMENTARY AGENDA

Time: 9:30am
Date: Thursday, 4 April 2019
Venue: Ngake (16.09)
Level 16, Tahiwī
113 The Terrace
Wellington

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2. Strategy

FIRST TO ZERO - WELLINGTON'S BLUEPRINT FOR A ZERO CARBON CAPITAL

Purpose

1. To seek the agreement of the City Strategy Committee to consult on the draft First to Zero plan (F2Z).

Summary

2. First to Zero, in draft form, was presented to Council on 21 March. This paper returns it to Council with the same context, but having incorporated the numerous amendments from 21 March and having been worked through with Cllrs. Pannett, Foster, Calvert, and Lee.
3. Climate change is an urgent problem for global, national and local authorities – the best science has given us twelve years to cut our emissions by half, with a need to cut emissions to zero by 2050 in order to maintain a safe and healthy environment for all of us.
4. Immense opportunity is layered within this challenge, with \$26 Trillion in economic opportunity by 2030 estimated by the New Climate Economy report if strong action is taken. The report was authored by The Global Commission on the Economy and the Climate that Helen Clark sits on.
5. Globally, the vast majority of emissions come from cities. Capital cities like Canberra are leading the way to a Zero Carbon future, along with more distant capitals like Stockholm and Oslo. Wellington has long had ambitious goals, but our path to the future needs refinement.
6. The risk to Wellington is immense, financially and socially, in the long term. But the opportunity to be a leader offers the chance not just to grab the economic opportunity noted – but to establish Wellington as a place for the jobs of the future, as well as a resilient city prepared for the shocks & stresses of the future.
7. The current Low Carbon Capital Plan expires in June, and the activities in it have largely been achieved. This review has been undertaken with an eye towards aligning our target with the best science and national aspirations, increasing the link between our targets and action, and harnessing the opportunity to not just set an example, but to identify the economic opportunity offered by transformative change.

Recommendation/s

That the City Strategy Committee:

1. Receives the information.
2. Agrees that First to Zero – Wellington's blueprint for a Zero Carbon Capital, attached, is approved for public consultation, noting that graphic and layout design is yet to be completed.

3. Delegates to the Chief Executive Officer and the Climate Change Portfolio Leader the authority to approve minor wording, formatting and content changes as agreed by the Committee.

Background

8. Background information is provided in the document itself.

Discussion

9. Since 2007, Council has maintained that by 2050 we will seek to reduce our greenhouse gas output by 80%. Given recent reports from the Intergovernmental Panel on Climate Change about the late hour relative to potentially dangerous risk, it is necessary to increase this to zero carbon by 2050 – with great progress made by 2030 – to preserve not just Wellington, but our shared home with the rest of humanity.
10. Past plans have contained a large number of activities, mostly completed, but have not made meaningful reductions in carbon output yet. While emissions have dropped 17% since 2006, they are only 2% below our 2001 base year.
11. If consulted on then approved, we will transition from a 3-year to a 10-year plan as part of the proposal. At 3 year intervals a check-in and report would be identified, with the opportunity to adjust initiatives. The last year of the decade would be spent developing a full rework of the plan.
12. It is also intended that an executive summary and supporting material – roughly 3 pages – will be created to assist all audiences in engaging with the material.
13. Providing it passes through consultation and is adopted, First to Zero would become a blueprint that would be developed leading up to the next Long Term Plan to understand resources required for delivery. The output of that process would return to Council for approval.
14. Ultimately, this is an essential conversation to have with our community because of the great risk we face, and great opportunity we could miss out on. While officers recommend a course not unlike the one suggested in the paper, a frank conversation with our community will be valuable.

Options

15. Officers recommend that the Committee approve First to Zero for consultation. This provides the opportunity to invite the community to have a conversation about climate issues, the plan's goals and activities, and the challenges we'll face going forward.
16. Alternatively, the Committee could decline to approve First to Zero for consultation. In such an instance officers would either return a paper to extend the Low Carbon Capital Plan or revisit the proposed paper post-election.

Next Actions

17. First to Zero is released for consultation April 15 - May 10.
18. Officers return to CSC in June with a final paper taking into account submissions.

Attachments

- Attachment 1. First to Zero - Revised [↓](#)  Page 7
Attachment 2. First to Zero - Engagement Plan [↓](#)  Page 69

Author	Tom Pettit, Sustainability Manager
Authoriser	Mike Mendonca, Chief Resilience Officer David Chick, Chief City Planner

SUPPORTING INFORMATION

Engagement and Consultation

To this point, Officers have consulted with the Resilience Steering Group, Environmental Reference Group, Portfolio leaders and several independent councillors. We have additionally sought review from 2 separate external parties. This next essential stage will offer an opportunity to reach a broad swathe of the community and get a sense for their views.

Treaty of Waitangi considerations

The key consideration around Mana Whenua is the implications of sea level rise. They have been involved in our process at Makara and will be involved going forward as well.

Financial implications

The financial implications of the proposal will be explored leading up to the Long Term Plan. However, it is notable life-cycle analysis would look favourably on many proposals e.g. Green Buildings, Water Meters, User charges.

Policy and legislative implications

We have considered a number of implications for our policies as well as the legislative instruments of both Council and our other Government partners.

Risks / legal

While there are no real legal risks, the key risks of inaction are clear: Wellington faces financial and community risk from sea level rise.

Climate Change impact and considerations

The plan is entirely about our relationship with Climate Change. In addition to illustrating the risks to Wellington and opportunity it presents, it presents a proposed way forward to mitigating that risk.

Communications Plan

The communications plan is continuing to be iteratively developed, but it is likely to focus heavily on digital communications channels.

Health and Safety Impact considered

N/A

Te tuatahi ki te kore **First to Zero**

Wellington's blueprint for a Zero Carbon Capital

Toitū te marae a Tāne
Toitū te marae a Tangaroa
Toitū te iwi

If the domain of Tane survives to give sustenance,
and the domain of Tangaroa likewise remains,
so too will the people.

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A moment with the Mayor

By many standards, Wellington is doing well. We've been judged the most liveable city two years in a row, in large part thanks to our environment. Our climate is mild and we enjoy clean air and a wonderful natural environment.

But climate change is upon us and the risks to our way of life are real. We need to act now. If we want our mokopuna to inherit a great city, we must do our part in cutting our emissions.

Previous generations of New Zealanders have led the debate on social change around all manner of issues. New Zealand has managed to change attitudes on issues like smoking, nuclear power and burning coal. It is critical to act on carbon in the same way. Positive change never happens overnight but inaction is not an option.

This generation's most important issue is climate change and securing the future for those to come. We also have a responsibility to act to help the huge number of other species that will be affected by climate change.

Wellington has been a leader in the climate change area in the past. Now we are ready to move to the next step by being First to Zero. This means giving all Wellingtonians information and choices about how to reduce our individual and collective carbon footprint for future generations. It also means not leaving anyone behind. Lower income households will face specific challenges and we will be working on solutions to assist them reduce their carbon footprint.

We look forward to having big conversations with Wellingtonians over the next few years, in particular young people and children who will face the impacts of climate change first hand and mana whenua as Treaty partners.

Wellington is an ambitious city and this is an ambitious plan. Now it is your turn to tell us what we we have got right and what else we should be doing.

The six big moves for a Zero Carbon Wellington

1. Shaping our plan for a growing City

The community has some big decisions to make about how Wellington will grow. With up to 80,000 people wanting to make Wellington their home in the coming decades, there are two options. Grow up – multi-level apartments in the CBD, townhouses and low-rise apartments in the inner suburbs and town centres, and abundant transport choice and amenity. Or we can grow out – find new, undeveloped parts of the city to support that growth in. Places where vehicle transport is inevitable and amenity inconvenient to reach. Growing up, unlike growing out, will lead to a Zero Carbon future.

2. Getting us moving in all the right ways

The infrastructure that Let's Get Wellington Moving will put in place through its programmes between the railway station and the airport represent a chance for a generational improvement in sustainable transport and active transport. Growing public and active transport infrastructure for all directions is an essential element of a zero carbon future. Once that infrastructure is in place, user charges to signal the true cost of driving and to alleviate congestion is the next necessary step to consider.

3. Becoming a leader in high performing buildings

Whether its Council buildings or buildings for others, lifting the performance of buildings is essential. The benefits include potentially lower infrastructure costs, cheaper operating costs, healthier environments, and lower carbon impacts. Existing buildings are harder – supportive advice is a great starting point. Council has already supported audits for nearly 2% of Wellington's homes through the Home Energy Saver advice service, and is looking to take that up a notch and replicate its' success for commercial buildings if possible.

4. Giving shared mobility options a lift

For Council it started with one Cityhop car in 2008, now there are MEVOs, scooters, Onzos and who knows what's next. Vancouver has 3500 car sharing vehicles helping them get people out from under car ownership's costs. By population, Vancouver indicates Wellington could see 300 cars on the streets, each taking 10 or more cars off the road as people sell up to join up. All that before counting the shared bikes and scooters, which are bringing a new micro-mobility aspect to Wellington's transport system.

5. Building a Wellington Climate Lab

Council has founded the Zero Carbon Challenge and Climathon and has worked collaboratively with energy companies and mobility companies. In addition Wellington has used community panels to self-determine options to adapt in places like Makara. Wellington is knee deep in a number of small initiatives to make a difference, but it's time to look for scale and transformative change. We will build a climate lab collaborating with partners around the city and country on solutions to develop best practice on emission cuts and adaptation.

6. Going for a zero emissions transport fleet

2050 is close. Even when accounting for the huge investments we're making in public and active transport, the car will still have a role, particularly for multiple stop and some longer trips. After all, our cities were designed for more than a century around vehicles. Electric vehicles reduce emissions by 80% compared to their fossil-burning counterparts, according to EECA, even accounting for the emissions to produce them. Given New Zealand's renewable energy assets, a priority is electrifying the fleet. If New Zealand is to convert the fleet quickly Government help is needed, but Council can provide charging, and look at developments to ensure they are taking electric vehicles into account where vehicles are present. Additionally, user charges can be used as influences towards zero emissions vehicles.

And one big question

It's evident above that a lot of the key actions deal with the car. Living more compactly, adopting shared ownership models, and investing seriously in public and active transport of all kinds. All while electrifying as much of the fleet as possible. The question is this:

Have we reached the end of the love affair with the car?

Plan at a glance

Transport	Building Energy	Advocacy
Let's Get Welly Moving	Planning for Growth	Mandatory energy use disclosure
Car sharing	Urban Development Agency	Improving the building code
Electric vehicle charging	Home Energy Saver	Mandate NABERSNZ
Dynamic shuttles	High performance building Incentives	Mandate Homestar
Bike & scooter sharing	Warmer Kiwi homes	No natural gas after 2035
Travel behaviour change	Allow borrowing against rates for sustainable Investment	Public and active transport investment
Close down streets	Solar community buildings	EV subsidies
User charges	Zero carbon parks	2030 fossil vehicle importation ban
Parking pricing	Neighbourhood grids	Reasonable bus fares
Cycleway network	Regulatory process influences	Reliable buses
		Develop biofuels
		Develop Direct Air Capture
		Waste reduction
		Container deposit scheme
		Product stewardship
		Diet change
		Carbon considered in the RMA
		Renewables investment
		ETS Improvements
		Procurement
Other Initiatives		
Wellington Climate Lab	Zero Carbon Challenge	Climathon
FutureFit	GHG Inventory	Consumption Inventory
Schools Calculator	Sustainable Food Network	Forestry Opportunities
	Climate and Inequality study	

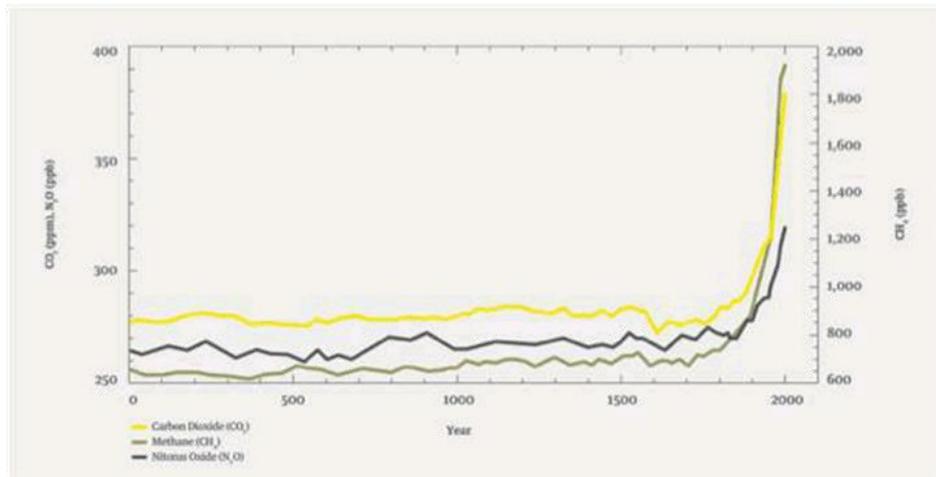
THE WCC PLAN		
Sewage Sludge	Procurement changes	Bylaw adjustments
Improve governance	CDP & CEMARS	Landfill activities
What might be needed?	Climate Resilience Fund	Climate Certified Bonds
Private cycle lanes	Circular Economy Study	Water meters
Green building mandate	Green building refits	No natural gas 2035
EV first fleet	Sustainable food events	Statements of intent
CarbonZero Council	Energy management KPIs	Climate Budget
Connecting Digitally	Energy saving investment	Green infrastructure
Assess embodied carbon	More sustainable building engineering/construction	Measurement framework

Adaptation		
Create adaptation plan	Adopt guidelines	Extend community process

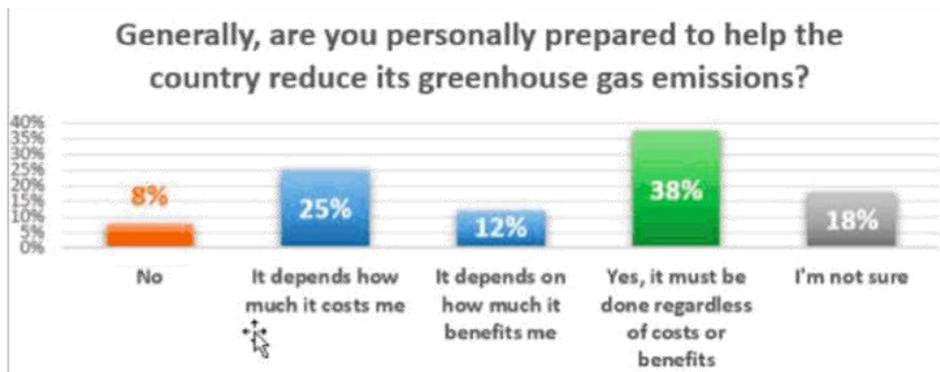
The Context

The capital celebrates being judged the world’s most liveable city, Lonely Planet’s “coolest little capital” tagline, and being the capital of creativity, culture, cafes, coffee and craft beer. Wellington is also a leader in ongoing restoration of the natural environment – from beaches to hilltops. All are essential parts of Wellington’s identity.

Less known is the achievement of being the lowest carbon city – per person – in Australasia. That’s thanks to being a compact city centre (helped by the far-sighted establishment of the Wellington Town Belt, and in recent decades the Outer Green Belt), the country’s highest levels of active transport use, public transport use and electric vehicle ownership per capita.



That said, there’s a problem in a wider context. The most recent Inter-governmental Panel for Climate Change (IPCC) report has given the world 11 years to get serious about sorting out emissions or face serious climate impacts – we need to cut emissions in half by 2030.



Luckily, there is a momentum for change. According to a Horizon Poll, 75 percent of New Zealanders are prepared to support greenhouse gas reductions through personal action if the costs and benefits are right.

And support is important. A wholesale change in lives – the energy we use, transport options taken, how and what we eat, and how we connect – is a monumental task that can't be done alone.

This presents huge opportunities, but also huge challenges – the economy is going to have to change in a significant way and those who lead will benefit, not just from a future-proofed economy at home, but from trade that develops as the rest of the world figures out the climate crisis and looks for leaders.

The scale of this change is so huge that it is hard to grasp. That said, according to IAG, one of New Zealand's largest insurers, 84 percent of New Zealanders think we can reduce climate change. This contrasts with only 10 percent thinking we will successfully do so. The capability exists, but does the will?



What gives particular hope is the recent push for a potential Zero Carbon Act to be put in place. Recent national consultation that attracted 15,000 submissions saw a target of zero emissions by 2050 and a Climate Commission both have more than 90 percent support from submitters. Taking that on board, there is wide agreement that New Zealand needs to set the right tone.

Wellington has a chance to step into a leadership role as a city with a plan for the future and pragmatic activities. And we have a good idea of what to do already – lowering emissions is well understood. But there is much more to do in finding better settings for city development, cleaner fuels and climate-friendly approaches to existing buildings. Major behaviour changes will be necessary.

The year 2050 may seem like a long way off. But decisions made now define whether the world left to kiwi kids will be hurting a little - or in bad shape. That's why thousands of young people recently marched down Lambton Quay to demand action during the School Strike for Climate 2019.

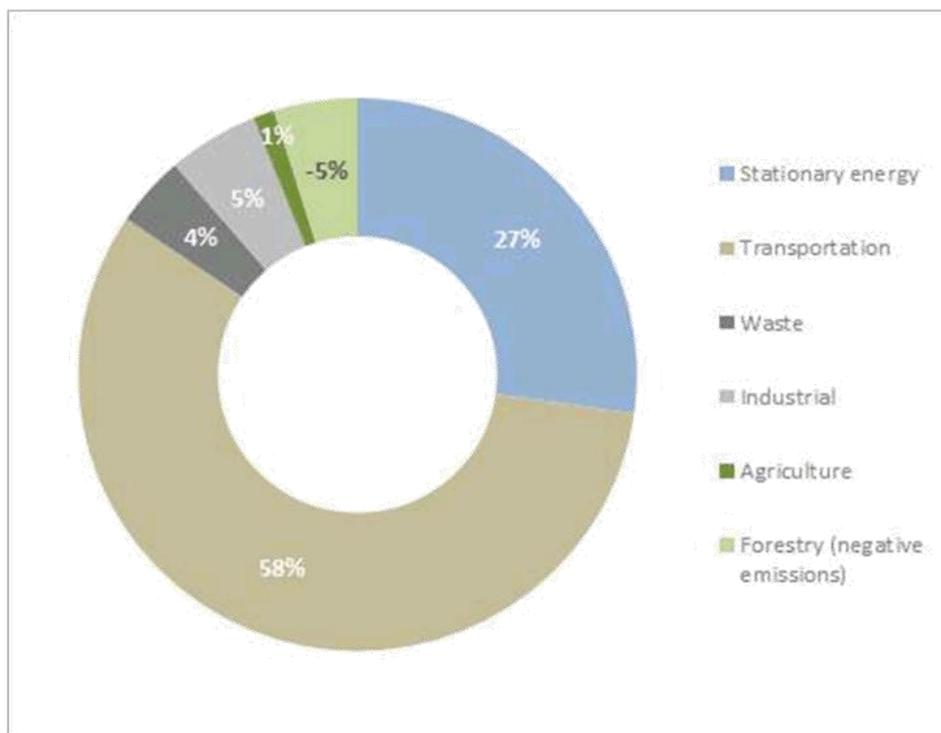
First to Zero sets out an ambitious series of challenges for us to address to make Wellington the first zero carbon city in Australasia, and to do so as fast and realistically as possible.

This is an urgent global challenge with only a few years to deal with it. Everything from conversations around the BBQ to conversations at political tables need to account for the challenges to the way things have always been done.

What do we mean by zero carbon?

Much of what makes a city move emits carbon. Moving around by car, turning up the heat, even having a bite to eat or throwing something in the rubbish. Currently, Wellington’s emissions are heavily weighted towards travel and energy use in buildings (also known as stationary energy).

It is important though that we understand that emissions are currently measured at the point of production. So our measurements exclude the emissions embodied in food and manufactured products created outside of Wellington. This is true of almost all cities and how they measure carbon, though, and someone living in Wellington is just as likely to want a burger as someone living in Westport. It is transport and land use that cities can primarily affect.



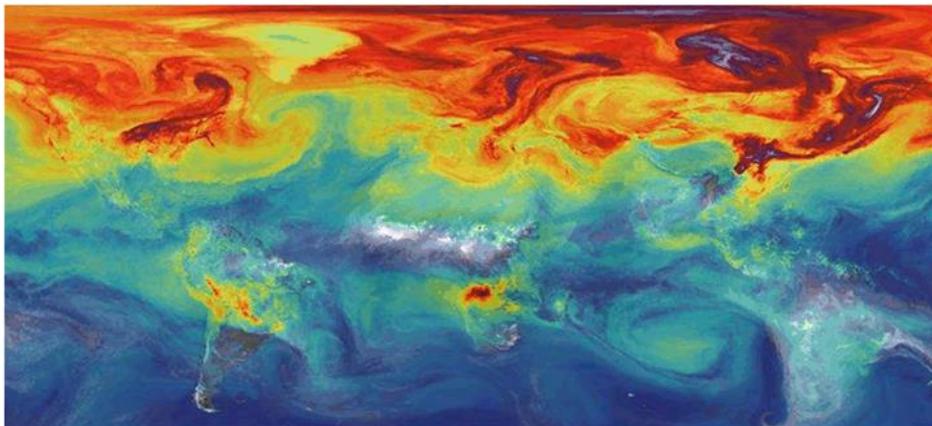
Taking into account Wellington’s emissions, Zero carbon is quite simple. We need to support changes in the city that reduce the emissions we create. This means:

- Designing a city that is less focused on lots of travel and giving people real affordable choices around walking, cycling and public transport
- Supporting a more sustainable, compact, liveable city

- Providing varied, high-quality low-emission housing options
- Switching off of fuels like petrol and natural gas
- Focusing the system on ways to avoid disposable products
- Dramatically reducing waste to landfill, and
- Having a look at individual issues like diet, travel, and emissions from our goods and services we get from elsewhere.

Zero carbon can be achieved, but it will require enormous change from all of us. Planting trees to capture carbon from the atmosphere will be required. There isn't enough land to offset Wellington's current emissions, but with strong effort in the other areas, the City could achieve the goal with locally planted forests in the future.

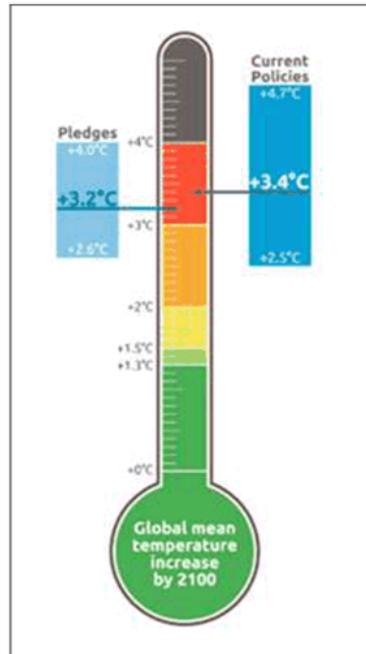
Why the urgency?



Keeping in the “Climate Safe Zone” of a 1.5 degree world is no longer possible, according to the latest research. The IPCC's 2018 report indicates what is ahead if the world cannot keep within 2 degrees of warming: hundreds of millions suffering food and water shortages; mass migrations and resultant conflict; massive biodiversity loss, including 99% or more of the coral reefs across the planet dying; and disruption of natural processes like storms and rainfall across the planet. Other studies show GDP reductions will be 3 or more times worse than the great recession.

Considering the world is on a pathway for a 3+ degree rise, the IPCC report issued a stark warning out of character for scientists – it noted the world is “well off track” to keep in the climate safe zone.

Letting the ‘unthinkable’ happen is not an option, cities have a part given they are the source of more than 70% of emissions. Here in Wellington City, the same is true. Given the massive human, financial and natural impacts of climate change, the responsible path is to act now, act strongly, and act for collective impact.



Why Wellington?

“Nations talk; cities act.” - Michael Bloomberg, former Mayor of New York City

In Wellington, the effects of climate change are here: low lying areas and flood prone areas like Makara, Kilbirnie and Tawa face challenges now and Tangaroa is taking back some of the reclaimed land in the CBD, where already basements are being pumped. Our underground stormwater network is already badly stressed in some areas - struggling to drain even at the best of times. While climate change may feel distant and detached, it is here now. Insurers have told Council that they will not cover for climate change because it is not an unexpected or accidental event, which has serious implications. These early impacts are more motivation than ever to look towards a zero carbon future. They also serve as a warning. The impacts later in the century - particularly of sea level rise - will prove more real as water laps at our gumboots. But they will prove more real to our wallets as well.

Council has not stood still and is investing many millions of dollars into seawalls, larger stormwater pipes, and better infrastructure to protect public property. We are also starting to talk with communities about if and how we can protect them in the future. In some places pulling back from the coast might be necessary eventually. Acknowledging this, each time infrastructure is built or regulations change is an opportunity to design for the future and aim for zero carbon.

Council has invested in technology like a 3D Virtual Reality simulator of how sea level rise could look here in Wellington, and has extensive mapping to show where and how areas of the city might be affected. Some of these climate impacts are already locked in based on past activity, but others can be avoided through the world adopting the challenge of reaching zero carbon.

The maps below are based on the Wellington Sea Level Rise Layers set at 1.4m of sea level rise - the “major new infrastructure” level for planning recommended in the latest Ministry for the Environment guidance for local government. This is an understandable scenario in under a century on current trends. While not a projection or a certainty, it is the current guidance. A return to the 1840s shoreline is essentially what that indicates.

15

Given 77% of GDP comes from within the CBD area, there will be impacts on the economy. This creates another strong reason for change. Given Council's understanding of the property system, a good proxy is the impact on properties rather than business – in this respect Wellington will see three key localized impacts: approximately \$7 billion in property affected by sea level rise at 1.4m of rise – about 10% of the city's property value. Second, approximately \$1 billion of Council property would be affected. Finally, properties that pay around 25% of the Council's yearly rates would be impacted. Not only will large funding streams be needed to face the challenges posed by climate change, but the funding available to Council to do so will be compromised.

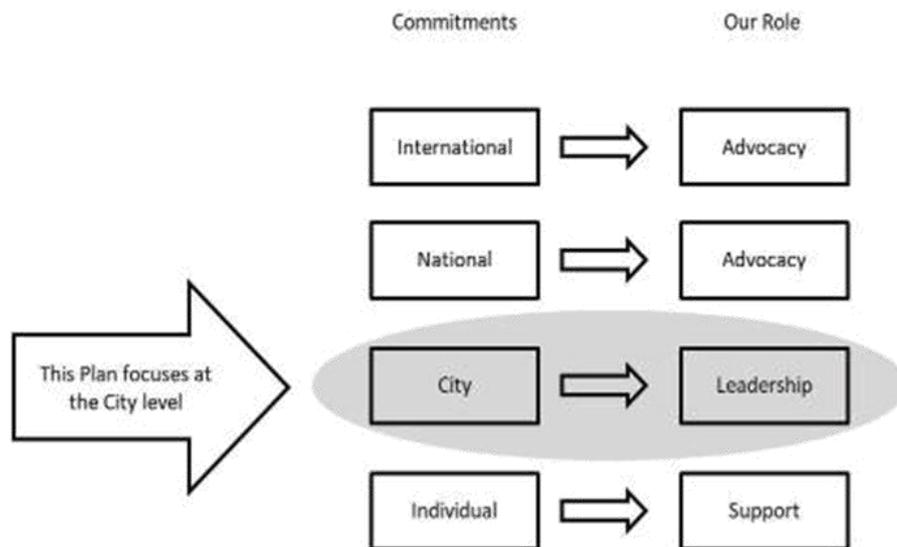
As a connected harbour city with a high income, highly-educated workforce, Wellington is also well-placed to develop a zero-carbon economy. There are expected to be significant economic benefits from carbon zero leadership according to Westpac and the Commission on the Economy and the Climate.





The Council's Role

Climate change is everyone's responsibility. While this plan is aimed primarily at the City level, this cannot be in isolation from the commitments and aspirations of our nation or our citizens.



Climate Equity

Time is short. Which means strong action is needed, and fast. That said, aside from its role in reducing emissions, the Council has a role ensuring the need to support disadvantaged communities is always considered. Council has to work together with support and partner organisations to ensure Wellington remains the world's most livable city – regardless of income – even on the journey to zero carbon. Separately, it will be key to support New Zealand's Pacific neighbours to remain where they want to be, though that possibility is becoming smaller by the day.

Making the targets official

Year	Wellington City Target	Wellington City Council Target
2020	10%	–
2030	40%	–
2040	65%	–
2050	80%	80%

Wellington City has had targets of 80% emissions reductions by 2050 for both the city and the Council for a more than a decade. But those targets are no longer viable. Council must go further, but it must particularly go faster.

Traditionally targets are set for a target year, but this can lead to some delaying action until the target year approaches. Council needs transformational change that will deliver as much carbon reduction as soon as economically and practically possible.

Internationally the zero carbon standard has been set by leading capital cities like Oslo, Canberra, and Stockholm. Locally the Hutt and Christchurch have followed suit. But in addition to net zero by 2050 targets, Council acknowledges a greater urgency. In line with the ethos of being First to Zero, Council aims to act now – there is no time to delay. Both of Council’s new targets are to reach net zero emissions by 2050 with the most significant reductions in the first 10 years.



Year	Wellington City Target	Wellington City Council Target
2020	10%	-

2030	43%	-
2040	68%	-
2050	100%	100%

To achieve this goal Council will have to be extremely ambitious in seeking not just the emissions reductions across the city, but also looking for opportunities to offset and capture carbon wherever possible - through forestry or otherwise.

As the city with the lowest per capita carbon emissions in New Zealand, growth in the city's population can be good for the climate. When people are choosing to live here instead of elsewhere in the country or the world where their emissions impact is more severe, there is a carbon benefit.

An important addition is to develop a series of smaller targets for each area such as transport, and building energy. This will be done as part of an implementation plan.

"Zero emissions is an ambitious but achievable goal."

—Former UN Secretary-General Ban Ki-moon

ACTION

Transforming our city

This action plan will focus on:

1. Transport
2. Building Energy
3. The Council itself
4. Advocacy

Given the urgency of the challenge, Wellington will attempt to make significant cuts to our emissions over the next 10 years. To do this, we will work in partnership with many stakeholders – mana whenua, iwi, young people and children, central government, other local authorities, business, non government organisations, institutions and individuals. We can not do this alone.

An implementation plan will be developed in time for the next Long Term Plan to show how we will achieve our aspiration of a zero carbon city. As part of the development of this Zero Carbon Plan and the implementation plan, we intend to engage with the public in a city wide conversation. It is important that the whole city is on board with this vision of going zero carbon.

Building energy use and transportation make up the vast majority of the city's carbon emissions as measured by emission production – and are highly influenced by where and how we grow. It is also important to start conversations about the goods and services we consume, even though these are attributed to the areas where those products are created.

We shape land use through planning rules and transport through investment and incentives. There are significant opportunities in both areas to see new and different ways of growing that transform Wellington as it is to Wellington as it could be.

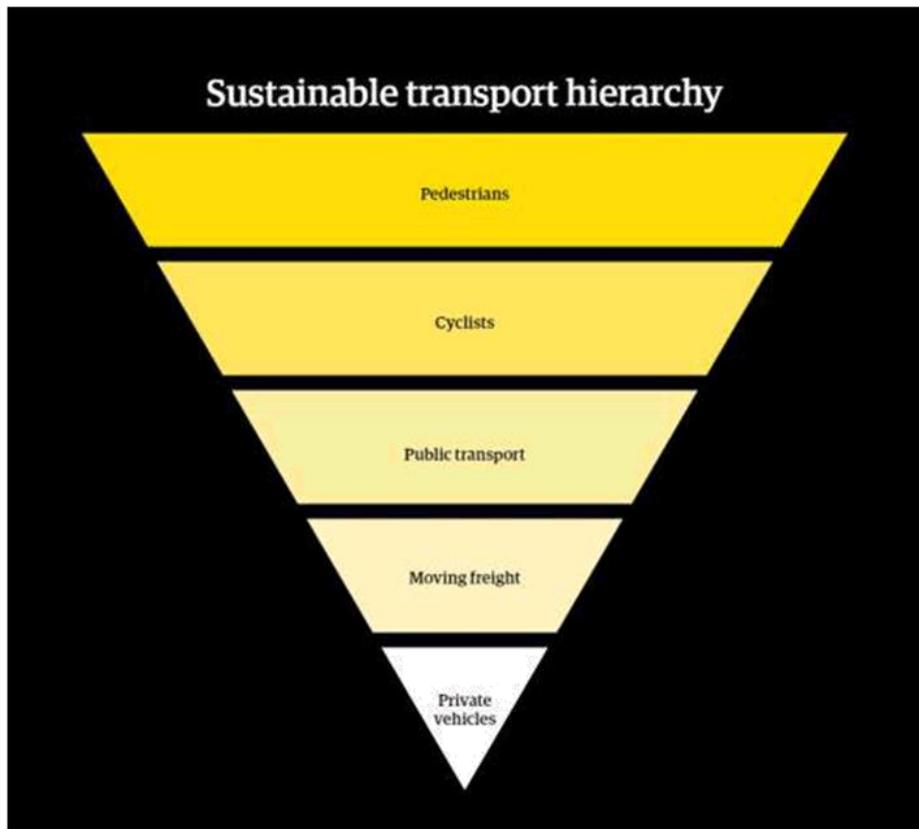
As a Council, Wellington could be doing much better to align with other Councils nationally in setting a standard and seeking to achieve a leadership position in leading to a zero carbon future.

Transport

Keystone Project – Let’s Get Wellington Moving

Let’s Get Wellington Moving potentially provides some opportunities to be First to Zero. Densifying and lowering carbon in the inner city and investing in infrastructure that supports great transport to the south and east will help get us towards our goal. Our existing transport system needs a big tune-up to deliver a low carbon future – more public and active transport, as well as more shared modes of mobility wherever possible. Even the simple switching of fuels is a help and needs to be supported where possible.

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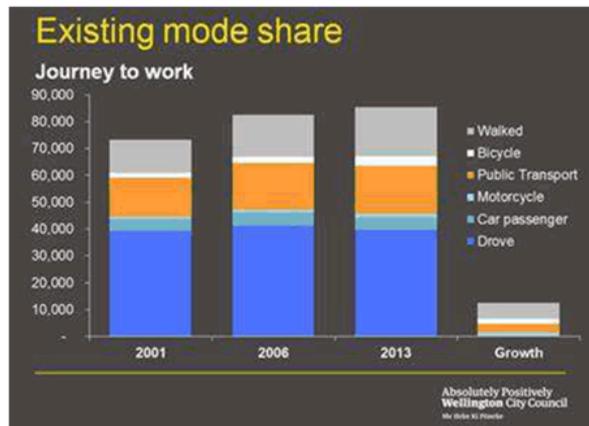


But this hierarchy:

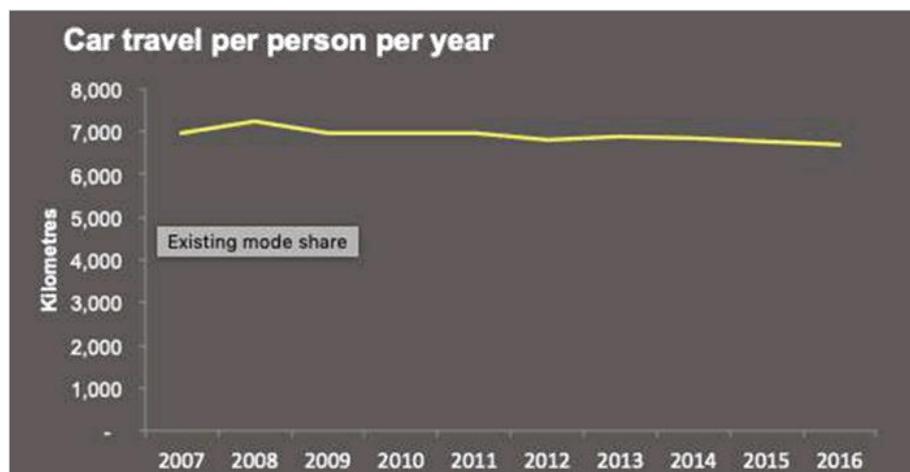
- walking
- cycling & micro-mobility (shared e-scooter, e-bikes, e-mopeds)
- public transport (trains, busses, light rail, ferries)

delivery vehicles
car sharing and pool vehicles
rideshare and taxis
private vehicles and motorcycles
aircraft
[For all - alternative fuels prioritized e.g. e-car > car but taxi > e-car]

In Wellington, we can take great pride in the fact that in terms of new commutes, between the 2001 and 2013 Censuses almost all growth for travelling to work was sustainable modes - walking, biking or public transport.



That said, that isn't the whole story. Since 2007 car travel in terms of km per person per year has stayed persistently high. So while Council is supporting the right decisions for getting to work, for other purposes the system isn't there yet. There is much more to do.



Let's Get Wellington Moving – a joint initiative between Wellington City Council, Greater Wellington Regional Council, and the New Zealand Transport Agency – offers an amazing chance to improve this particularly for the city centre, south and east. The project aims to integrate all modes of transport in a holistic way whilst improving amenity and liveability in the central city. The scale of investment for LGWM is unprecedented in Wellington – it presents a once in a generation opportunity to create the transport system needed to support a low carbon future.

But the south and east aren't the whole city. The north is where most carbon comes from, and the west has seen the most congestion growth is. As a result, Let's Get Wellington Moving will also need to focus enhancing public transport and active modes in to the north and west.

Key considerations:

- Enhancing opportunities for active transport throughout Wellington
 - o Cycling improvements enhance opportunities for the 76% of Wellingtonians who've said they are willing to give biking a try in a safe environment. Additionally, walking facilities give the whole population a chance to have a more pleasant experience.
- Raising the quality, capacity, and affordability of public transport across the city.

- Let's Get Wellington Moving creates a huge opportunity to improve public transport service in the central city, south and east.
- The north and west could be easily enhanced with bus lanes and other improvements tailored to address their daily congestion.
- Develop targets to strongly increase public and active transport use by 2025.
 - Council will develop strong targets in time for the next Long Term Plan to increase public and active transport use. There are many opportunities for more people to walk, bike and use public transport for work and play.
- Sending signals about road use
 - To limit congestion and signal the true cost of driving there is one powerful tool to put in place – user charges. Not only do they help optimize the road use between modes, but charges help a city with no more room to build road capacity manage demand.
- Enhancing development around public transport routes
 - Transit Oriented Development presents amazing opportunities to build more livable, connected, and vibrant town centres around mass transit stations.
- Decarbonise the vehicle fleet
 - There are multiple types of Zero-Emissions Vehicles (ZEVs): hydrogen, biofuel, but the most common is electric. There is still a great deal of driving in Wellington, and as we go to Zero Carbon those cars need to change to ZEVs, and soon. Kiwis keep their cars longer than any country in the developed world, so what we're buying now is critical.

Secondary initiatives:

Car Sharing – Car sharing has seen a massive growth in popularity since the passing of the Low Carbon Capital plan and Car Share Policy that set aside on-street space for the use of car sharing firms. Thousands of Wellingtonians now use car sharing services, with 38 cars circulating. We will further explore supporting this essential service, including removing restrictions to its growth such as removing the cap on the number of available car parks open to these schemes, and encouraging the use of such schemes in apartment complexes.

Electric Vehicle Charging – EV charging has seen incredible growth in Wellington. We’ve installed three slower chargers at Zealandia, three fast chargers in the CBD thanks to Contact Energy and ChargeNet New Zealand, one slower charger on Bond Street, and have fifty slow residential chargers in progress. In the end, the quarter of Wellingtonians without access to off-street charging should remain the focus as the lack of ability to charge at home is a barrier to owning an EV.

How shall we support people to buy electric vehicles?

Why support EVs?

- 38% of our city’s emissions come from road vehicles.
- Going all-electric would slash these emissions by 80%, and will do so even more with a 100% renewable grid.
- The technology is proven and becoming more prevalent and affordable.

What should we do?

Incentives	Charging	Perks
Purchase Subsidy or Feebate - Central Government	Fast Chargers - Private sector	Free Parking -Local Government
No Road User Charges - Central Government	Charging at home -Homeowners (70%) -Local Gov’t (30%)	Cordon Charge / Fossil Free CBD -Local Government
Vehicle Import	Town Center /	Carpool / Bus lane use

Standards - Central Government	Destination Chargers - Businesses - Local Government	- Local Government
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Dynamic Shuttles – Shuttles that pick you up from home and are controlled by an app on your phone, integrating with the public transport system or heading to parts of the city that would allow more effective active transport have been rising in popularity throughout the world. With our partners we will look to see point to point transport options included in the mix for development as we aim to enhance levels of convenience whilst not undermining public transport.

Bike sharing & Scooter Sharing – The trials of bike and scooter sharing in Wellington present an opportunity to understand if these modes belong in Wellington. Tens of thousands of bikeshare rides later, the key outcome achieved has been introducing new people to biking, and generally shifting the conversation towards enjoyable modes of shared transport whilst being mindful of the need to protect pedestrians.

Support changing travel to work and school – We will establish a travel behaviour change programme for businesses much like the one for schools. In other New Zealand cities, advisors coming to the office helping staff on a one-to-one basis has been incredibly effective at shifting employees of local businesses from cars to sustainable transport. In addition to this, we will expand support for our schools travel programme.

Close down streets, convert to shared spaces, and detune in town centres and CBD to traffic – In conjunction with communities that are interested, Council will seek areas in the CBD and Town Centres where closing down streets or converting to shared spaces and implementing safer speeds will support the vitality and livability of those areas.

User charges and access – The prospect of user charges to decongest the road network could also permit incentives for zero emissions vehicles early on and

control of other kinds of vehicles later on in the transition to zero carbon. Exempting zero emissions vehicles from paying the charge until they comprise a certain percentage of the fleet might be a sensible approach. In 2035 we will consider ceasing to allow vehicles that are fossil fuelled through the cordon, creating a fossil-free CBD. If a cordon charge is for some reason not introduced, Council will explore methods of creating a fossil fuel free zone in the CBD.

Parking pricing adjustments – One of the key services council provides to the community is parking throughout the city. Whether for residential, coupon or short stay parking, we will explore a long term plan for tolling higher emissions vehicles via parking charges towards the end of the transition. This may require the assistance of Central Government.

Building a citywide cycleway network – Let's Get Wellington Moving will cover some of the city when it comes to cycleways, but ensuring access to safe cycling options across the city will be good for all road users. Taking cars off the road decongests the route for drivers, provides health benefit for new and existing riders, and enhances spend at local retailers.

Building Energy

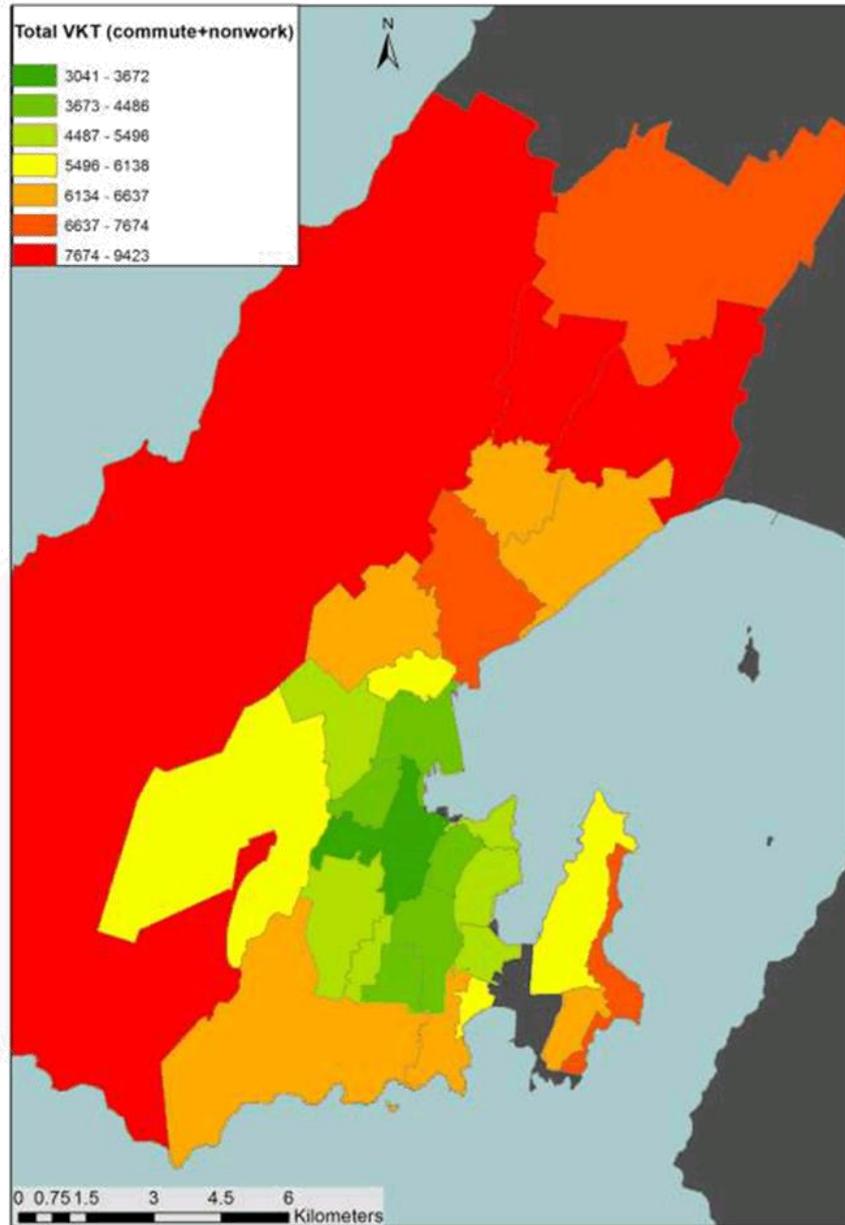
Keystone Project – Planning for Growth

Planning for Growth is a multi-year project that involves the review of the Wellington Urban Growth Plan and a full review of the District Plan. The Urban Growth Plan guides where people will live, while the District Plan guides how we build in each area of the city. The fundamentals behind Planning for Growth are that we will have to welcome a growing number of people who recognize that Wellington is an amazing place to live and want to make it their home - about 50,000 to 80,000 more people by 2043. That's a big increase (up to almost 40%) for a city of 217,000.

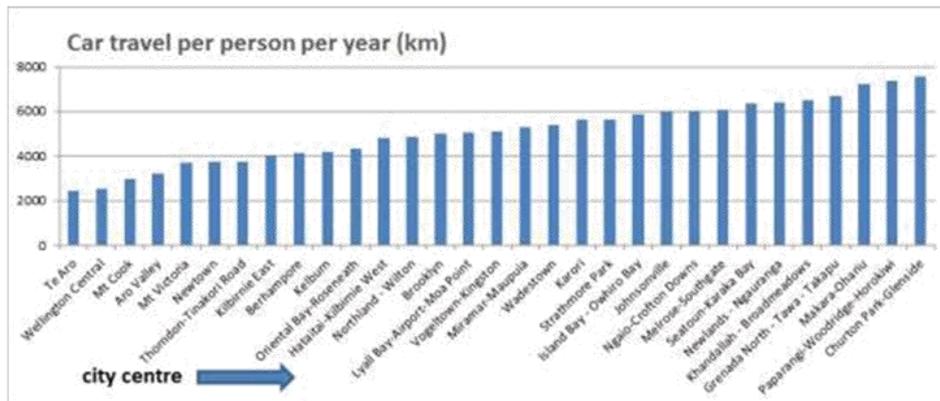
From a sustainability perspective, the more residents the better. Wellington is the lowest carbon city per capita in New Zealand, so the more people choosing a low-carbon lifestyle here from elsewhere in the country or in the world, the better it is for overall greenhouse emissions. But there are some potential barriers to providing for this growth within our current plan settings.

The planning for growth process really represents a once in a lifetime chance to direct growth to the right places and set our planning rules to promote not just a compact Wellington City, but a compact Wellington Region by

embracing those who wish to make the city their home.



Estimated vehicles KM travelled based on census responses (Census and WCC)



Estimated vehicles KM travelled based on census responses (Census and WCC)

Key considerations:

- Relationship to growth
 - Inviting more people to live in Wellington has so many benefits – socially, economically and culturally. It also has environmental benefits given our lower carbon lifestyle compared to many places in the world. But it will remain true only if those newcomers live in the inner city, where travel distances are short and walking and cycling are easy ways to get around, or if they locate in more distant areas but use zero carbon transport. Whatever the case, growth in Wellington is more helpful from a carbon perspective than growth elsewhere in the region or elsewhere nationally.
- Maximizing compactness
 - Compact, liveable urban forms result in lower carbon emissions. When shops, jobs and entertainment are nearby there is far less need to travel long distances using transport modes that are unsustainable – and living in denser housing forms uses less energy.
- Reducing the minimum parking requirement
 - Currently the District Plan requires a minimum number of parking spaces for new dwellings except in the CBD and suburban centres. This can make houses more expensive, more difficult to build, occupies useful private land that could be dedicated to more housing or amenities, and encourages driving. The removal of the

minimum parking requirement in the CBD has been hugely successful for developments there, and Council will investigate means to further this concept, given it no longer aligns with Council's strategic transport objectives.

- Character areas
 - The character areas in the inner suburbs cover the lowest-carbon areas of the city to live in. These areas are close to many key services and employment opportunities, so sustainable transport is convenient. Many households in these areas don't own cars. But these areas are also subject to character rules in the District Plan which impede prospects for welcoming more neighbours. Re-evaluating these areas and understanding what definitively needs preservation and where there may be opportunities for more Wellingtonians to enjoy the low-carbon, liveable, walkable lifestyle these areas offer is a critical goal of Planning for Growth.
- District Plan Review
 - As part of the Planning for Growth process, Council will evaluate a number of potential enhancements to the District Plan to yield positive outcomes. High performance building requirements, minimum car share parking requirements, minimum bike parking requirements for work and home, and other aspects will all be evaluated for their potential to influence outcomes. The review is also an opportunity to better understand how the rules are performing in relation to creating a lower carbon, higher amenity, and more liveable city. Rules such as height limits, controls on infill development, recession planes and site coverage requirements are among the rules in the District Plan that will be reviewed.
- Minimum/Maximum Parking Restriction Per Property Study –
 - To support planning for growth, Council will explore in detail what areas of the city are suitable for minimum parking restrictions. In doing so it makes sense to explore which zones might benefit from a maximum parking restriction to preserve land availability and focus usage on easily available alternatives in such a zone.

Secondary initiatives:

Urban Development Agency – Since 2015 the Council has grappled with the prospect of an Urban Development Agency to address marginal development prospects in areas like Adelaide Road. A UDA would enable more brownfields development, at higher densities, with more liveability and zero carbon outcomes able to be integrated into its remit. A UDA could also deliver outcomes quicker than the district plan review. Such an initiative is also being considered by the Government and would be subject to wide public consultation, but has clear benefits.

Home Energy Saver – Council’s most popular programme for supporting community climate action for almost a decade has been the Home Energy Saver programme. Each year, 500 Wellington households invite Sustainability Trust auditors into their homes to learn about the key changes they can make to lower their energy use and save both money and cut emissions. Currently Council is reviewing this programme to see how we can best help households understand what they can do to lower their impact. Council will investigate how to reach 50% of the City’s households with this programme by 2029.

Enhanced high performance building incentives – Currently council offers a 50% reduction in development contributions to some buildings that meet specific certification standards set by organizations like the New Zealand Green Building Council or LEED. We will review these incentives to ensure they align well with the outcomes sought, what level of certification is required, and what kind of payment could be needed to encourage all commercial buildings to perform as well as they can whether they are new or being retrofitted.

Warmer Kiwi Homes – Insulation is the most important element of an energy retrofit for older homes. Warmer Kiwi Homes is targeted at homeowners with a Community Services Card or living in high deprivation areas. EECA provides a two thirds subsidy with additional support from local stakeholders, such as the Council, to further reduce the costs to homeowners.

Explore borrowing against rates for sustainable household infrastructure –

Household improvements related to energy efficiency deliver tremendous outcomes, ranging from the reduction in carbon to improvements in health. At scale, it could even save infrastructure costs. As Greater Wellington Regional Council already offers this for insulation, we will explore retrofit support options that allow ratepayers to realise their and the Council's low-carbon aspirations using rates as a financing mechanism.

Neighbourhood Grids – Council continues to support the neighbourhood grids programme we are running with Contact Energy and Wellington Electricity. This programme saw 23 Wellington City households in areas with vulnerable substations outfitted with solar + battery power systems and a resilience package that included water tanks, LPG and an energy assessment. In an outage it also provides a base for neighbours to come charge phones and connect with friends, family and emergency services. With another year left on the trial we are monitoring the success of the programme, as well as other opportunities.

Solar on community facilities – Building on the positive early experiences of the Neighbourhood Grids project with Contact Energy and Wellington Electricity, the Council will aim to get involved in a number of solar installations in different community contexts – e.g. community centres, or council facilities. Solar, particularly with battery systems, offers the opportunity to create not just sustainability gains but also resilience benefits.

Zero Carbon Parks – Council owns a tremendous variety of parks supporting our resident's desires to live an exciting and active lifestyle. Ranging from playgrounds to sports pitches and beaches – and hundreds of buildings around the city – all have their own role to play in promoting Zero Carbon Parks. We will explore the materials we can use when parks are rehabilitated to have the least emissions impact, and on an ongoing basis explore adjustments that can be made to existing buildings and materials.

Explore ways to provide sustainability information through regulatory process – Council is significantly involved in every new building that goes up and major renovation in Wellington, and could use this opportunity to provide advice or enhancements to support better decisionmaking.

Case Study of Community Carbon

Aorangi House on Molesworth Street is a refurbished office building in Wellington that won an award from the World Green Building Council and is one of New Zealand's most intelligent structures. As part of the Wellington Smart Buildings Challenge (which aimed to achieve 10% energy savings in just one year), WCC also contributed a small amount to energy optimisation of the building in 2016.



Rejuvenated from an obsolete 1970s office building, Aorangi House is an exemplar of up-cycling. The building was abandoned in 2005 because of issues with warming, cooling and ventilation. The Aorangi House's energy optimisation project demonstrates how existing buildings can be effectively revitalised to exceed modern day building standards.

Aorangi House achieved New Zealand's first 5.5 Star NABERSNZ energy rating for a refurbished office building, the second highest rated building to date. This represents 64% less energy and GHG emissions than a typical New Zealand office building.

Other Citywide Activities

Greenhouse Gas Inventory – Every four years Wellington City Council is required to conduct an inventory of all greenhouse emissions emitted within the city boundaries according to an international standard. Council has been a leader in this area, and will continue to lead in this area among Australasian Councils. Council will continue to partner with other local authorities in our region whenever possible.

Consumption Inventory – Council will produce a consumption based greenhouse gas inventory that indicates not just the level of emissions from producers in Wellington, but the emissions from products we consume.

FutureFit behaviour change app – Council’s FutureFit calculator stemmed from a commitment to staff behaviour change in the Low Carbon Capital Plan. It is a personal carbon calculator web app that includes the ability to choose actions to reduce your carbon - and be reminded by text to do them. We invited our partners at Auckland Council to contribute to a collaborative outcome. Having tried it out with staff, we’re quite excited to deploy it over the next year. All in all, getting the right information in individual’s hands for them to make Low-Carbon decisions is an exciting opportunity.

Wellington City Council has partnered with Auckland Council to develop futurefit.nz, a simple yet powerful web tool so individuals can engage with climate change. FutureFit provides a snapshot of an individual’s impact and supports making positive changes in the way we live to help reduce our footprint – you can set some specific goals and actions. If you’re really keen, it’ll remind you each week which actions you’ve signed up for.



Zero Carbon Challenge and Climathon – For four years now Council has supported both the Low Carbon Challenge and the Climathon. As founder and core funder of the Low Carbon Challenge, we have lifted idea stage businesses up to exciting opportunities year after year. As a co-host of the annual Climathon with Victoria University of Wellington, we have presented a fixed opportunity for the community to come together once a year and apply their mind to the exciting low carbon possibilities.

Schools Carbon Calculator – Inspired by FutureFit, a group of young innovators in Wellington’s Smart Seeds program run by GHD developed the concept for Torokiki – a carbon calculator and reduction competition for schools. In partnership with the education and environment sector, we aim to make the competition a reality.

Sustainable Food Network – In the Wellington Resilience Strategy, Council committed to developing an understanding of what a Sustainable Food Network

could deliver. A lower carbon culinary arena in Wellington benefits us not just from an environmental standpoint, but also delivers health and resilience co-benefits. What that network will look like is currently being developed, starting with initiatives such as Sustainable Food Forums to regularly bring together groups working towards sustainable food goals across Wellington.

Pursuing forestry opportunities – Wellington, despite its incredibly compact urban form, has substantial rural areas suitable for planting with trees to create carbon sinks. Determining the most appropriate way to incentivise planting privately held land serves as a sound companion to planting out our own significant land holdings where possible. It is also necessary to understand what balance between native and exotic tree species is most appropriate to promote biodiversity and conservation co-benefits while seriously seeking a lower carbon future – both for private and public lands. While natives are key for a lot of reasons, exotics sequester much more carbon – much faster – and can be planted alongside natives.

Understanding inequality – An investigation into how the city can support low income households to adopt environmentally sustainable practices to reduce inequalities between different communities as the city moves to the Zero carbon model.

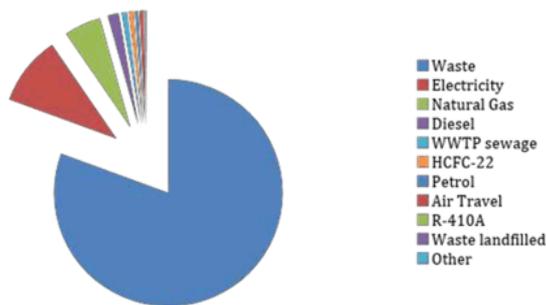
The Wellington City Council Plan

As with anything, leading starts by looking in. Council needs a comprehensive plan to reduce the carbon we emit as an organisation to zero by 2050. Unlike other areas, Council has much more control over what happens in our own facilities or through our own operations than in those that belong to or are managed by others.

Adding on to this, we need to view our status as a leader as an opportunity to bring our contractors, Council Controlled Organisations and partners along with us on the decarbonization journey - finding advantages where they may be and finding mutually acceptable ways through challenges.

Wellington City Council's Emissions

The Council measures corporate emissions, including activities Council owns and operates like the landfill. Also included are Council Controlled Organizations like the Wellington Zoo and Zealandia, both of which are already CarbonZero certified. Council participates in the Certified Emissions Management and Reduction Scheme (CEMARS) to measure and audit emissions, which is the measurement tool all CarbonZero organisations use.



Council operations 2017/18' tCO2e (incl. landfills)

What is remarkable about the corporate inventory is how it is dominated by waste. Landfilled waste makes up more than 80% of Council emissions due to the ownership of two Council landfills. That said, the Council is the manager of that waste for the community, not the producer, so it is a challenge to influence.

That ownership also indicates a risk - as carbon prices rise, they will be directly reflected in landfill costs. All told, Council has a goal to reduce waste by 1/3 by 2026 and an aspiration to be a waste free region in conjunction with other councils. We will investigate whether Council's remaining emissions can be offset by entering into reforestation agreements with private landowners. Other areas beyond waste are critical as well, particularly when viewed in the context of leadership. Electricity and natural gas are the largest known quantities, while emissions from contractors are largely unknown.

Existing projects:

Sewage Sludge - The Council has already committed to funding a sewage sludge processing solution at the Southern Landfill. In exploring solutions we will also look at the potential for digesters or co-processing of other waste streams than sludge to see if further maximised benefit can be achieved.

Procurement - Sustainability is more and more of an evaluative component of large procurements for other Councils and entities, and Wellington would benefit from similar focus. A procurement strategy and procurement policy that place requirements on emissions output, social values like living wage, and Maori issues is essential to bring product and service providers along on a journey that delivers for those outcomes.

Governance - Wellington City Council currently assesses every Council paper, investment, policy and proposal for its relationship and impacts on climate change, but the assessment currently does not involve in-depth analysis. Re-evaluating how the Council takes account of climate change in each Council paper to ensure robustness and enhanced consideration for key issues will empower officers across the business to better support Councillors.

Bylaw Considerations - We will look to ensure that bylaws align with supporting a liveable, low carbon city. Issues ranging from parking, trading in public places, water services and waste management all interact with carbon in

significant ways and as they are revised, bylaws need to account for Council's ambitions.

CDP / Global Covenant of Mayors for Climate and Energy – The Council continues to report through the CDP Programme (formerly the Carbon Disclosure Project) for both voluntary city and corporate carbon disclosure and benchmarking against other cities. It also serves as mandatory accountability for the Global Covenant of Mayors for Climate & Energy. The Covenant of Mayors is fast becoming the foremost global accountability regime for cities aiming to reduce their carbon impact, with thousands of cities reporting each year.

In 2018, over 7,000 companies, representing over 50% of global market capitalization, and over 750 cities, states and region disclosed their environmental data through our online platform. That's an 11% jump on 2017.
- Paul Simpson, CEO of CDP

CEMARS (Certified Emissions Measurement And Reduction Scheme) – Council continues to use the CEMARS programme to measure and audit emissions as an organization.

Activities at the Southern Landfill – So far, drilling more methane collection wells, upgrading the generator that converts that methane to energy, and even adjustments to our collection regime have been employed to reduce our largest source of carbon. Through our Regional Waste Management and Minimization Plan, Council has committed to a reducing our waste by one third before 2026 and to becoming a waste free region long term.

New Commitments:

What might be needed? - This is an enormous change programme to shift the carbon outcomes of the city and the Council. As a matter of priority Council needs a piece of work to understand how far this plan will get us - and what we will need to do in the future on top of it. The information is essential to ensure our targets remain closely linked with the actions in our plans – and this piece of work may feed into additional projects for the implementation plan.

Investigate and develop a significant Climate Resilience Fund – A fund to support engagement with communities, building of infrastructure, development of solutions that will reduce emissions and assist with adaptation

Investigate Climate Certified bonds – Some debt that the Council would issue would have certification programmes attached to them that require alignment with various sustainability concepts or the 2 degree target. Council will investigate the use of these instruments.

Investigate private financing of separated traffic lanes – Some shared mobility companies have come to the table potentially ready to pay for the necessary street modifications to make their business viable. Council will explore how to incorporate this into our funding framework and if this is viable with the partners we are working with.

Understanding the Circular Economy – The Circular economy attempts to get rid of waste in our economic system instead focusing on reusing precious natural resources. Council will undertake an investigation of the inclusion of the idea of the circular economy into the council's policy framework.

Water measurement and management – Council's water system is far and away its largest source of electricity emissions. But to improve our systems we need to better understand them, and the best way to accomplish this is through water meters. This has the added benefit of reducing water demand through severe leak identification, which may prevent the sunk carbon cost of building additional reservoirs for supply.

As of 2024 LTP all buildings, housing and refits must achieve the green star maximum rating for Council funded, planned, facilitated or supported buildings including via Urban Development Agency – When Council builds, part-funds, or refits a new building for any purpose, regardless of owner, from the 2024 LTP all buildings must achieve the highest possible green star

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standards. Establishing such a standard creates lower long-term operating costs and higher overall benefits to the community and council through lower necessary infrastructure expenditure.

Council buildings refitted to meet maximum possible green star rating – The vast majority of buildings are those that exist already. When refits occur, Council will seek to refit to the maximum possible Green Star standard. For the same reasons that new buildings can contribute to Zero Carbon outcomes, existing buildings can as well.

No natural gas in any building by 2035 – The single biggest challenge with buildings from a carbon perspective is the use of natural gas, and it represents a large portion of WCC's emissions output. In addition to the carbon implications, the move away from natural gas is fiscally responsible and ensures stable access to energy in the long term given the oil and gas exploration ban.

Flipping the fleet - Our fleet policy will shift to electric-first. In addition, car sharing will be emphasised across pool vehicles to support modes of transport that increase vehicle utilisation and remove asset challenges from the Council's responsibility to third party organisations. This will all happen while supporting businesses that enhance vehicle utilisation rates. Electric priority will extend to contracts as a key procurement factor e.g. for rubbish trucks.

Support sustainable food events – Council has a number of relationships with key culinary events and institutions e.g. we provide the land for the Sunday Market. We will use those relationships to deliver sustainable food outcomes by promoting integrating principles of the Sustainable Food Network into these activities.

Statements of Intent / Letters of Expectation – All entities that Council has a stake in will from 2020 be required to introduce carbon emissions as a performance measure and carbon measurement and planning as a requirement

to deliver on the 2050 goal. Some entities will have customized expectations, e.g. for Wellington Water embodied carbon of new facilities and infrastructure.

CarbonZero Council – Council will explore the prospect of making ourselves a CarbonZero certified council in the first 10 years using offsets.

KPIs for energy management – All facility controllers whether managers, property managers or budget holders over facilities which use energy will have KPIs integrated into their contracts relating to energy management and emissions reduction.

Climate budget – Wellington City Council will develop a “Climate Budget” to account for all carbon emitted and provide a three-yearly pathway of reductions to achieve the 2050 target.

Connecting digitally – WCC will ensure all key worksites have teleconference equipment and actively promote their usage.

Invest in energy savings across the business - Council has built up a menu of energy saving projects to invest in, but to date has not progressed to unlocking their potential. Council will devote more attention to investments that could result in significant financial savings in conjunction with emissions savings.

Embodied Carbon Assessments - Council is involved in a number of areas that emit substantial carbon. Construction, infrastructure management, and building operations have significant impacts, including at the early stage. All three can benefit from embodied carbon assessments and full life-cycle cost analysis of implementation – which can lead to cost reduction as well.

Green Infrastructure plan – Traditional methods of managing stormwater include pipes and water treatment systems to minimise flooding. Green infrastructure on the other hand uses investments like green roofs to manage stormwater. The Council will develop a green infrastructure plan for Wellington

which will not only manage stormwater but increase food security and amenity throughout the city.

Encouraging more sustainable building, engineering and construction practices - Through our regulatory role we may have powers to enhance the building industry's practices and support better outcomes.

Development of a measurement framework to keep track of our emission cuts - Council will attempt to work in partnership with relevant organisations such as Victoria University and NIWA and so on to develop a framework for measuring our emissions to keep us on track for our goal and to be accountable for our work.

Advocacy

As a council we have an opportunity to support strong action by others - other levels of government, the community or even with industry to better achieve our shared goals. Whether through submissions, gathering support, or collaborative investment, our influence as a partner is just as valuable as our own activity. Going forward it will be essential to feed back to all levels of government and work closely with the community and industry to deliver the zero carbon growth we need to sustain our economy and employment while shifting the future from one that compromises the environment to one that enhances it.

Our partners, government or otherwise, often hold far more power as they have a national footprint, meaning it is only through them that Wellington's Zero Carbon vision can be a reality.

Mandatory energy use disclosure

One key problem we currently face is that building energy is poorly understood. An energy use disclosure mandate integrated with existing property information would provide the opportunity to support building owners in informing themselves, regulate building performance, incentivise good performance, or at least just support good decision making with salient advice. This low-cost policy option is used in other cities across the 100 Resilient Cities network like New York and New Orleans.

An opportunity to enhance the building code

The building code currently falls short in terms of carbon sensitivity relative to energy efficiency. Enhancements to the building code are the single most important action that can be taken to ensure that future buildings are contributing to our zero carbon goals. An easy way to achieve this may be to require certification of a certain standard. But perhaps most importantly of all, this is a tremendous opportunity to enhance health, combat energy poverty, reduce emissions, and fundamentally create better homes and commercial buildings for Wellingtonians (and all New Zealanders).

"If we build warm, dry, homes then we're going to reduce health costs for both the individual and the Government, so it's about being smarter, investing at the beginning and getting the benefit of good design." - Andrew Eagles, Chief Executive of NZGBC

Extend NABERSNZ to all commercial buildings

NABERSNZ as a certification system for rating the energy efficiency of office buildings. Adapted from Australia, where it is mandatory for large office buildings, the same mandatory system should be implemented here. This is because commercial buildings use 21% of New Zealand's electricity, costing business \$800 million per year with an average assessment of a 20-25% scope for improvement on building energy performance. This would help tenants understand the performance of the building they wish to occupy.

A 2015 Australian report, "Commercial Building Disclosure", calculated AUD\$44 million savings due to increased energy performance between 2010-2014 and AUD\$168m in productivity gains from NABERS. - Commercial Building Disclosure, PROGRAM REVIEW, ACIL Allen Consulting

Extend Homestar to all residential homes

Similar to NABERSNZ, a mandatory residential energy efficiency rating system is a tool that should be employed. As it stands currently, New Zealand has a voluntary energy efficiency rating system in that of the independent Homestar program administered by the New Zealand Green Building Council (NZGBC). This should be mandatory for all new-built homes.

"The future is about measurement and reducing." - Andrew Eagles, Chief Executive of NZGBC

Implications for natural gas

Following the ban on offshore oil and gas exploration permits, a serious signal has been sent that the transition to a zero carbon economy is underway. The replacement of natural gas with alternative fuels - including and particularly hydrogen - has great potential as a viable source of energy but also as potential opportunities in the zero carbon economy.

London, Aberdeen, Hamburg and Milan are just some of the European centres

with hydrogen-powered buses - H2 Aberdeen

Sustained public and active transport investment

Council strongly endorses central government to continue investment in public transport on the back of their latest Government Policy Statement; and invite them to support initiatives that encourage the uptake of active transport such as walking and cycling.

“Transportation is not an ideology...It’s about taking a look at the capital asset we have and using it in the most effective way possible.” - Janette Sadik-Khan, former NYC transportation commissioner

The need for EV subsidies from Central Government

There are significant barriers to the uptake of electric vehicles (EVs) that need to be urgently addressed so that the majority of Wellingtonians choose electric when purchasing a car. Barriers include the upfront cost of purchasing, which only Central Government can fix. To address this, the Productivity Commission has recommended, and WCC has endorsed the introduction of a feebate scheme.

“Transitioning our fossil-fuelled transport fleet to run on clean, renewable electricity is one of the most effective ways for New Zealand to reduce greenhouse gas emissions and meet our climate change commitments,” - Andrew Caseley, Chief Executive of EECA, 2018

A proposed 2030 fossil vehicle importation ban

Road transport is responsible for roughly 38% of Wellington City’s emissions, significantly more than the national proportion. It is clear that rapid EV uptake is required if we are to meet our 2030 and 2050 targets - uptake that even subsidies will not generate. Given that New Zealanders hold on to their vehicles for longer than any other developed country, a reasonable import ban - aligned with vehicle lifetimes - in 2030 would fit well with the goal of reaching a zero carbon fleet by 2050.

Denmark, France, India, Ireland, Israel, Netherlands, Norway, Sweden and the United Kingdom have already legislated for the ban of the importation of internal combustion engine vehicles for new vehicles sales to be enacted for

2030. China has enacted a ban for 2040.

The issue of fares in Wellington city

The aim of public transport should not be to maximize revenue but rather a plethora of outcomes such as: to be part of an array of excellent transport choices; remove cars from the road; reduce the need for maintenance and roading projects; enhance liveability and lower our overall emissions. But in Wellington we have a problem. The fares are higher on buses than trains, higher than other centres in the region, higher than elsewhere in the nation, and even higher than elsewhere abroad. Council considers that Wellington needs an equitable farebox recovery scheme. The goal should be no matter where you come from, a couple and a child should be able to get in to town on the bus cheaper than by private transport, when parking costs are considered.

Affordable and convenient bus services

Council already works closely with Greater Wellington on issues like bus priority and Let's Get Wellington Moving. However, it is important to emphasize that while Council will continue this good work, the Council strongly advocates for more affordable and convenient bus services for all Wellington communities as a matter of priority.

Commercial scale production of biofuels

The development of biofuels addresses several gaps. Electrification for heavy transport and the aviation and shipping industry requires technology that is unlikely to be available to reach a zero by 2050 target. The large-scale production of biofuels presents an attractive alternative. Scion Research found that drop-in fuels from non-food feedstocks, particularly forestry grown on non-arable land, are the most attractive option.

The development of a wood-based biofuel industry will open up new income opportunities for farm foresters and other forest owners. - the Bioenergy Association

Direct Air Capture to synthetic fuel feasibility

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The idea of Direct Air Capture (DAC) where CO₂ is 'captured' from the atmosphere and either stored underground as rock or converted into synthetic fuel is admittedly new, but potentially exciting. Central government should explore the possibility of funding research and development into this technology or look for opportunities to invest. Such a tool will complement the 1 Billion Trees afforestation initiative well.

"Our clean fuel is fully compatible with existing engines, so it provides the transportation sector with a solution for significantly reducing emissions, either through blending or direct use," says Steve Oldham, CEO of Carbon Engineering (A DAC fuel company). "Our technology is scalable, flexible and demonstrated."

Actions for the continued reduction of emissions within the waste sector

Emissions from Municipal Solid Waste in Wellington City still comprised 4% of Wellington city's gross emissions in 2014/15. Further reductions can and must be achieved toward Wellington becoming a zero carbon city. Significant increases in the price of the Waste Disposal Levy and extension to other landfills will support this.

Container-deposit scheme

Already allowed for under the Waste Minimisation Act 2008, a container deposit scheme provides for the collection of a monetary deposit on beverage containers at the point of sale. Upon the return of the container to an authorized location or retailer the redeemer is refunded the deposit. Such schemes are widespread and highly effective at increasing recycling rates.

The opening of the Queensland Container Refund Scheme on November 1 2018 collected \$1 million of refunds issued by November 12 through the collection of 10 million bottles and cans. - Container Exchange, 2018

Product stewardship

Product stewardship places the onus for waste management not just on the manufacturers but extends this to include all parties in the life of a product including producers, retailers and consumers

New Zealand sends around 2.5 million tonnes of waste to landfill, or over a tonne of rubbish per household. The majority of this waste is not reprocessed or recycled, and doesn't break down over time. – Ministry for the Environment, 2018

Education initiatives surrounding diet change

Diet is major portion of climate impact, but realistic expectations need to be applied to managing a transition to a low-carbon future. Diverse options ranging from local vegetable co-ops, plant-based to lab-grown meat replacements, and aquaculture are all needed to average down carbon emissions on the journey to zero carbon. The continued education and promotion of alternatives needs to occur.

The Better Futures report released in February showed a 3% increase in meat-free diets in 2018 now totalling 10% of New Zealanders who are meat-free. – Colmar Brunton's Better Futures report, 2019

The Resource Management Act needs consideration of GHGs

Upon its conception in 1991, the RMA was undoubtedly revolutionary. However, the RMA does not consider the effect of greenhouse gas emissions on climate change. As our primary piece of legislation pertaining to land use, the omission of the effect of GHGs needs to be urgently addressed.

New Zealand's key environmental statute is disabled from considering what is a critical issue relating to climate change. - Sir Geoffrey Palmer, 2015

Sustained investment in renewables within the electricity mix

Renewables currently comprise approximately 80% of the electricity mix, amongst the highest in the OECD. If that moves to 100% or near it, it will improve emissions from both buildings and transport as the fleet electrifies.

Options for the Emissions Trading Scheme

The ETS is the Government’s primary policy tool to reduce greenhouse gas emissions in New Zealand. To date, it has been severely underperforming and has not provided either a disincentive to emit carbon, nor an incentive to plant forests to remove it. This must change – and fast.

An all-of-government shift to carbon sensitive procurement strategies

New Zealand’s all of government procurement system should be both comprehensive and overarching in having a set of social procurement policies.

Case Study of another Critical Actor**Wellington Airport**

Wellington Airport is a recognized contributor to the City's carbon emissions. Though the contribution largely comes from the aircraft themselves, rather than the airport's operations, much of the pushback on projects like the potential runway extension centers on the fact that about 20% of the city's carbon emissions are attributable to air travel. That said, the carbon intensity of travel per dollar spent on travel decreased by more than 50% between 2006 and 2013 and presumably continues to do so - as aircraft get more efficient, passenger loadings increase and the industry becomes more aware of the challenges it will face in the carbon space.

But it is important to remember that the airport is a lifeline to the world. It supports our thriving economy not just of business and technology, but also of tourism. The airport is a cornerstone of Wellington as the capital city of an island nation - not just business people and tourists, but diplomats and dignitaries pass through it. We can't do without it, and to contemplate otherwise requires one to contemplate the broader impacts of restraining it. In fairness, the Council owns 33% of the Wellington Airport, but we acknowledge its importance not because of that stake, but because of the essential necessity of support it provides.

The airport is already working hard to make its operations much more sustainable. Recently it has done the following:

- Added bike racks, parking bays for car share vehicles, and EV chargers for taxis
- Built a parking garage that is fully EV ready, and installed some chargers
- Conducting a flight path optimization trial collaboratively with other partners to help aircraft use less fuel and make less noise, bringing down emissions too
- Minimizing embedded carbon in the new terminal construction
- Using recycled asphalt pavement for taxiways and other repaving

And in the future they see the opportunity for things like:

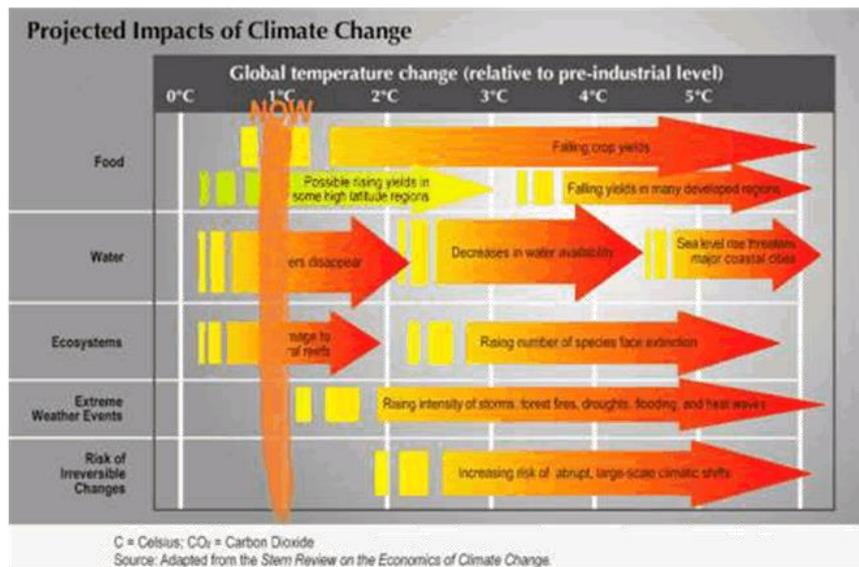
- Ground electrification
- Opportunities around public transport arriving at the airport

Ultimately with the airport, though, there are two enormous opportunities. One deals with travel on the ground - getting to the airport - which is (rightfully) not captured by the airport's emissions inventory. What high quality public transport link to the airport could be possible. What could be more convenient?

But the second, and the most serious and important issue to solve our air travel emissions issues, is alternative fuelled aircraft. Domestic aircraft may someday be able to operate either on a hybrid or even full electric basis. But to fly international biofuels, hydrogen or direct air capture fuel creation will be required. Given how essential air travel is to New Zealand - as it is the aforementioned small trading nation - a huge central government push for a solution to this issue should be part of the ongoing equation. One can switch a diet overnight. Or start cycling to work. Or even put curtains on the windows. But the international air travel system has high fixed capital costs and long term contracts. Strong investment is needed now in potential solutions so they will be ready when the time comes.

ADAPTATION

The most essential element that isn't covered by having extremely strong emissions reduction action, nor setting ambitious targets, is the aspect of what we do with the changes that are already locked in.



Each community will have different challenges. How do we support an area that is largely commercial, and houses a significant proportion of our GDP as a city? Conversely, if it is largely residential what is the approach? The big questions are how do we make decisions, what solutions are needed, when and how will they be implemented, and who will pay through what vehicle. But making those decisions is something that needs to be done as a community, with the right information and full understanding of what's ahead.

The Council will also develop a separate Adaptation Strategy in time for the 2020 reporting cycle for the Global Covenant of Mayors in line with our commitment

In the mean time we will focus on the two following actions:

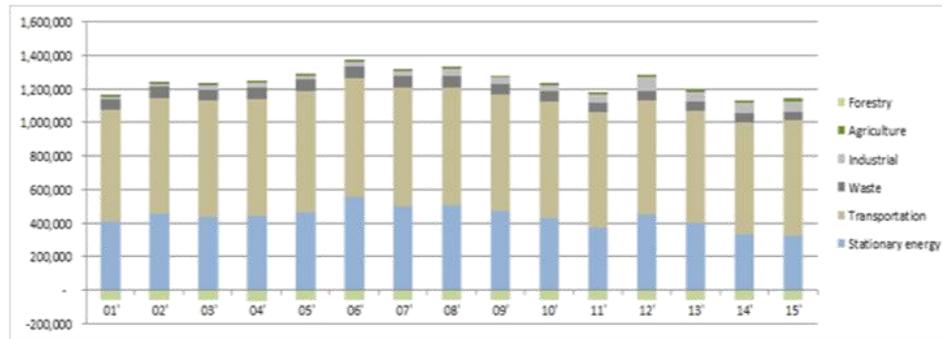
Adopt Ministry for the Environment guidance levels for sea level rise – The Council will adopt the Ministry of the Environment’s sea level rise guidance for planning and operations purposes. At the time of adoption, the latest science will be considered alongside.

Extend community based consultation processes where possible – Council will explore further use of community decisionmaking processes like those deployed in Makara once the outcomes of that process are better understood.

APPENDIX

I. Wellington's Full Emissions

Here is our profile in full:



CO2e emissions city by year (tonnes CO2e)

Wellington has been measuring carbon emissions for more than a decade. When broken down, our emissions inventory shows six main sectors emit in Wellington. The majority of our emissions come from transportation, with the bulk of the rest coming from energy use in homes and workplaces. That said, the consumption of goods and services that are produced outside our city is not currently accounted for, even though they are a large contributor to global emissions. For example, if the inventory included the associated emissions related to producing and transporting the food, appliances, or electronics purchased within the city, Wellington emissions would be much greater than is accounted for from the six primary categories. This would be true of most urban areas, though.

Between 2000/01 and 2014/15, the GHG emissions produced in Wellington City reduced by about 2%. That's slow, but it isn't hopeless. The level of emissions peaked in 2005/06, and has since reduced almost 18% - which bodes well for the potential to create a zero emissions pathway. The long-term reduction in emissions from electricity consumption (-29%), solid waste disposal (-24%) and agriculture (-14%) tells an encouraging story. However, an increase (+445%) in emissions from industrial product use (e.g. refrigerants and air conditioning), as well as an increase in aviation fuel (+11%), diesel (+23%) and a decrease in net carbon stored in forests (-7%) have counteracted most of

these reductions. The total emissions for the city (2014/15) was 1.14 million tonnes of CO₂e.

II. Accountability – 2013 and 2016 Low Carbon Capital Plan

In terms of completing activity – the Sustainability programme has been successful for some time. Over the last six years, Council has completed 52 of 58 activities outlined in the two Climate Change Action Plans.

But is just doing what is in these plans enough? Council has set ambitious goals – goals worthy of the challenge ahead of us. In the past, Council has even been a leading city on climate issues. But there is a disconnect between our stated goals and the substantial change needed to become a Zero Carbon Capital. Leading up to the 2016 Low Carbon Capital Plan, Council invested significantly in the information we needed to make the best possible decisions. Council started the process of shifting towards a more ambitious footing. First to Zero continues that, acknowledging the power Council has through setting the standard as a leading Capital city and promoting change.

Limiting global warming to 1.5°C would require “rapid, far-reaching and unprecedented” changes in all aspects of society. - IPCC SR1.5 report published October 2018

GLOSSARY

Green Infrastructure – Infrastructure designed into the city that maximizes natural elements to manage water instead of traditional pipes and pumps. This can include rain gardens, green roofs, permeable pavements and much more.

Climate Certified Bonds – Bond debt independently certified for projects that will contribute to keeping the planet within a 2°C warming boundary.

Circular Economy – A circular economy is an alternative to a traditional linear economy (make, use, dispose) in which we keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of each service life.

Adaptation – Adaptation to climate change is engineering or devising ways of adapting to the serious challenges it poses to each individual community, ranging from Sea Level Rise, drought, severe rainfall, heat waves, and more.

Mitigation – Mitigation to climate change is reducing impacts on climate change by limiting CO2 output in the first place in order to limit overall impact on warming.

Feebate – A feebate system is one that charges a fee based on emissions levels on each vehicle entering New Zealand, and that fee is then turned around and used for a rebate on Zero Emissions Vehicles.

Cordon Charge – A cordon charge creates a cordon around the city which when a vehicle passes it to enter the city it is charged a certain price. It helps to manage congestion and limit vehicles in areas that have limited capacity or are being prioritized for other modes.

Zero Carbon Capital Communications and engagement plan

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

Scope

We want to know what appetite there is for Wellington City Council to work towards becoming a zero carbon capital, so we balance the activities that produce carbon with activities that reduce it.

Having zero net carbon will help reduce our contribution to global warming.

If New Zealand doesn't take action soon we estimate we will lose a \$30 billion opportunity. This is a big challenge and we need to start taking action as soon as possible – Wellington is well placed to lead.

We're asking you if you support our target of becoming zero carbon, whether you support the general direction we propose and what the priorities should be.

Purpose

To determine our carbon goals for Wellington City and Wellington City Council and achieve support for the actions we are proposing.

Context

The Paris Accord aims to keep global warming below a 2 degree increase by the end of 21st century and pursue efforts to limit the temperature rise to 1.5 degrees

Large numbers of school students marched throughout the country on Friday 15 March in protest against the Government's inaction to address climate change.

Climate change is starting to draw greater attention world wide

Our city tomorrow – Planning for Growth consultation starts 8 April. It is our response to the pressures of growth and climate change. Speaker series has covered topics such as climate change

City Councillors have asked to increase the level of action and engagement.

Zero Carbon Capital is seeking agreement to our overall goal and approach to achieving zero carbon emissions as quickly as possible.



This consultation is predominantly led by Wellington City Council and we will be responsible for the policies and actions that come out of it.

Key Consultation Stakeholders (see full plan for more detail)

	Inform	Consult	Involve	Collaborate	Empower
Youth Council			X		
Wellington Ratepayers	X	X			
Wellington businesses	X	X			
Other councils in region	X	X			
Environmental reference group			X		
Mana whenua/iwi partners		X			
Wellington Sustainability managers	X	X			
CCOs	X	X			

We will directly inform and invite feedback from a range of other stakeholders that includes EECA, Air NZ, Wellington Airport, Victoria University, Otago University, Massey University, Wellington Electricity, Forest and Bird, Greenpeace, Living Streets Aotearoa, Wellington Airport, Cycling Action Network, Capital Coast DHB, Wellington Region Climate Change Working Group and others

Approach,

The challenge is...	So we will...
there are other simultaneous consultations occurring and this consultation could get lost in the noise	use the other consultations to attract attention to this one. Promote this consultation directly from the other sites and indirectly with display advertising that targets people who have visited the other consultation sites
we have already engaged substantially with youth, through the Youth Summit, and the Wellington Public through the Planning for Growth. People may think haven't listened.	show people we have heard what they said by reflecting previous comments/feedback through social media
The actions in the plan are all for Wellington City Council and people may not see the personal relevance for them and engage with the plan	engage with credible third party experts and ask them to endorse the consultation by sharing through their networks
climate change is a world problem and people may not think our contribution is relevant or significant	describe savings in a way people can relate to them (such as flights to London) so people can visualise our savings
youth are most affected by future climate change, but are difficult to reach and engage in council policy	ask the Youth Council to engage with youth and represent their views to us and use the feedback we have already gathered through the youth summit and ask youth leaders who ran the school protest to help engage through their social media and engage organisers of the Climate Challenge for secondary schools.
because the consultation is high level, it may be difficult for people to engage sufficiently to understand it and provide constructive comment	increase perceived relevance by asking experts to endorse it and further engage on specific initiatives as part of the ten year plan.
The Wellington rate-paying base is broad and difficult to reach	focus on digital communication, particularly social media that will filter the messages to the relevant audiences and

Zero Carbon Capital
Communications and engagement plan

Absolutely Positively
Wellington City Council
Me Heke Ki Pōneke

Activities



Youth summit (Years 9-10) provided feedback and ideas around sustainability and climate change.
November 2018

Links from other consultations:

- Annual plan
- Planning for growth (including speaker series)
- Parking policy (tbc)
- LGWM announcement (tbc)

From 15 April 2019

Youth Council engaging public at 1842 water level points (with business cards directing to the website)
From 15 April 2019

Reminder email to key stakeholders
6 May 2019

Planning for Growth survey 2018 indicated level of concern about climate change and trade-offs people were willing to make
8-25 November 2018

Direct email to key stakeholders to inform them consultation is open
15 April 2019

Key stakeholders/credible sources sharing, writing social media (including Sophie Hanford and Raven Maeder, School Strike 4 Climate NZ leader and Gen Zero)
From 15 April 2019

Social media, action focussed messaging
From 6 May 2019

Planning for growth speaker series raises issues relating directly to climate change
14-28 March 2019

Social media posts
From 15 April 2019

Virtual forum
1 May 2019

Forum
15 April-11 May 2019

FutureFit social and media promoting personal action to address climate change
From 15 March 2019

Mainstream media, linked to Planning for Growth
From 6 April 2019

Google adwords to direct people who are looking for the consultation to the right place
From 15 April 2019

Iwi partnerships consult with mana whenua
From 15 April

Discussion to key stakeholders at Mayor's Summit
5 April 2019

Display advertising, retargeting people who have already engaged in Planning for Growth
From 15 April 2019

This week in our Wellington digital newsletter
15 April 2019

Consultation summary on WCC website, pointing to forum
From 15 April 2019

3. Policy

PRIORITY BUILDINGS: COMMUNITY FEEDBACK ON HIGH TRAFFIC AND EMERGENCY TRANSPORT ROUTES

Purpose

1. The Council consulted on high traffic routes and emergency transport routes to identify priority buildings in the city.
2. The consultation was carried out under the Special Consultative Procedure in late 2018 and this report provides an overview of that feedback and makes recommendations to set high traffic and emergency transport routes in the city.

Summary

3. New Zealand is seismically active and has experienced a number of significant earthquakes in recent years.
4. While none of these were centred in Wellington, the city did suffer damage to its infrastructure and building stock from the 2016 Kaikōura earthquake and a number of buildings have since either been pulled down due to the damage sustained or remain unoccupied.
5. In response to the Christchurch earthquakes, central government passed amendments to the Building Act 2004 (the Act) – the Building (Earthquake-Prone Buildings) Amendment Act 2016.
6. The Act identifies Wellington as a high risk region and requires the Council to identify priority buildings for remediation by setting high traffic and emergency routes in the city.
7. These routes were consulted on with the community in 2018 and 53 written submissions were received and 9 oral submitters were heard.
8. The feedback has been considered by officers and a number of changes are being recommended to the high traffic routes. These are outlined in the body of the report and in Attachment 2.

Recommendation/s

That the City Strategy Committee:

1. Receive the information.
2. Note that Wellington is identified as a high earthquake risk region under the Building Act 2004.
3. Note that by being identified as a high risk region in the Act, the Council is required to identify priority buildings. Owners of such buildings have 7.5 years (half the normal time) to remediate their buildings from the time they are notified they own a priority building.

4. Note that the Council used the Special Consultative Procedure to consult on proposed high traffic routes and emergency transport routes (as a means to identify priority buildings) from 19 October to 23 November 2018.
5. Note that City Strategy Committee heard oral submitters on 6 December 2018, received the information and thanked submitters.
6. Note the summary of community feedback and officer responses as outlined in Attachment 1.
7. Agree the changes to high traffic routes in response to consultation feedback and further building information as outlined in paragraph 16 (clauses a-f) of this report.
8. Note that additional support is being considered for earthquake prone building owners as part of the 2019/20 annual plan process.
9. Agree the high traffic and emergency transport routes (thoroughfares with sufficient vehicular or pedestrian traffic to warrant prioritisation, and routes of strategic importance) as outlined in Attachment 2 and 3.

Background

Legislative requirements

9. In response to the Christchurch earthquakes, central government passed amendments to the Building Act 2004 (the Act) through the Building (Earthquake-Prone Buildings) Amendment Act 2016.
10. The Act identifies Wellington as a high risk region and requires the Council to identify priority buildings for remediation.
11. Buildings identified as a priority building must be remediated in 7.5 years (half the normal time) from the time building owners are notified that they own a priority building.
12. The Council is required to let building owners know if they own a priority building no later than the end of December 2019.

How priority buildings are identified

13. Priority buildings are identified in one of three ways:
 - a) *Legislation* – the Act identifies most education facilities, hospital emergency departments and buildings supporting emergency services as priority buildings.
 - b) *High traffic routes* – any building with unreinforced masonry elements that could fall in a moderate earthquake onto a street, road or other thoroughfare that has sufficient vehicle or pedestrian traffic to warrant prioritisation is a priority building.
 - c) *Emergency transport routes* – any building that could impede a transport route of strategic importance (in terms of an emergency response) if it were to collapse in a moderate earthquake is a priority building.
14. The Council used MBIE guidelines to set proposed high traffic routes in the city and WREMO and emergency service providers were an integral part of proposing the emergency transport routes.

Consultation process

15. The Council consulted the community on the proposed high traffic and emergency transport routes between 19 October and 23 November 2018 using the Special Consultative Procedure. A total of 53 written submissions were received.
16. A public meeting was held during the consultation period in the CBD on the proposed routes and this was well attended by building owners affected by the proposal.
17. Oral hearings were heard on 6 December 2018 and 9 submitters presented their submission.
18. A summary of community feedback and officer responses to key issues is attached to this report (Attachment 1). Full copies of all written submissions are available online at <https://wellington.govt.nz/have-your-say/consultations/closed-consultations>

Discussion

Summary of key themes and issues from consultation

19. The Special Consultative Procedure and consultation document was focused on obtaining feedback on the proposed high traffic and emergency routes as a means to identify priority buildings. That is the process set down in legislation. The feedback from submitters covered the proposed routes, but also covered a much broader range of issues associated with priority buildings legislation and earthquake strengthening in Wellington more generally. The key themes and issues that emerged from the consultation process are outlined in detail in Attachment 1 including officer responses in relation to particular submissions where appropriate. A summary of the key issues and themes is outlined below:
 - *High traffic routes* – support for the routes centred on Wellington being densely populated and highly pedestrianised, that it will improve Wellington’s overall resilience, and that the consequences associated with not carrying out strengthening work as early as possible should an earthquake happen would result in significant loss of life. Opposition focused on the inclusion of specific streets or laneways, the treatment of the entire CBD as a high traffic area, that the threshold to determine a high traffic route (1000 vehicle movements per day) was too low and resulting in too many routes being identified, and that private roads/laneways should not be included (eg. Egmont Street).
 - *Emergency transport routes* – most submitters were generally supportive of emergency transport routes. Opposition focused generally on the number of emergency routes (too many) and the financial impact on building owners along these routes.
 - *Proportionate response* – a number of submitters expressed the view that the earthquake-prone priority building legislation is a poorly considered policy response and over reaction (by central government) to the Christchurch earthquake. This theme was also strongly expressed at the public meeting where submitters voiced their concern that this was not a proportionate response to the risk.
 - *Public vs private benefit* – this issue was a significant theme throughout the consultation and was a strong area of debate at the public meeting – that reducing the risk to the public from buildings is a public good and should be supported with public funding.

- *Support for building owners* – earthquake prone building owners expressed strongly held views that government (central and/or local) need to provide financial support in order to achieve its stated objective of having priority earthquake prone buildings remediated in 7.5 years. There was a strong sense that there was a public good element to strengthening work and that therefore government support was appropriate, but also, that without support, building owners would not be able to meet the deadline for remediation. In addition to financial support, submitters were also supportive of Council providing non-financial support eg an advisory service that building owners could call on, and publishing information and guidelines for assessing and retrofitting EPBs. A number of submitters noted that they were not commercial building owners and didn't always have the necessary expertise to undertake complex capital works at the scale required and assistance was needed for some building owners and body corporates.
- *Timeframes for strengthening* – submitters generally did not support the timeframe provision in the legislation. The feedback was that existing timeframes were already difficult enough to meet, and in many instances the new reduced timeframes for priority buildings would be very hard or impossible to meet because the engineering / construction sectors were not big enough to be able to complete all the work by the required deadline.
- *Heritage* – submitter feedback was that there needed to be appropriate levels of support for heritage buildings where remediation could be more challenging. Submitters also advocated for more technical advice from Council on heritage issues, and a number also noted that greater weighting should be given to safety if there was conflict between strengthening and heritage.

Recommended changes to high traffic routes

20. In response to submissions officers have retested the high traffic routes against MBIE criteria, undertaken more detailed analysis of some of the key routes, and updated the database recognising some buildings have been remediated since the consultation process commenced. As a consequence, the following changes to the high traffic routes are recommended:
- a) The following routes can be removed because buildings have been remediated between August 2018 and March 2019 (August was when data was first captured). This includes:
 - The Ridgeway, Brooklyn
 - Mills Road, Brooklyn
 - Mornington Road, Brooklyn
 - Ottawa Road, Khandallah
 - Awarua Street, Khandallah
 - Stoke Street, Newtown
 - b) In the consultation document, where an earthquake prone building was situated on a corner both roads/streets were included in full. This caused some confusion as often one of the roads/streets had relatively low traffic counts. To clarify this, where there is an earthquake prone building situated on a corner, the main high traffic route remains in full and the other route is shortened. The following streets/roads have been shortened to reflect this change.
 - Feltex Lane, Te Aro

- Claytons Ave, Te Aro
 - Boston Terrace, Te Aro
 - Lukes Lane, Te Aro
 - Palmer Street, Te Aro
 - Hawker Street, Mt Victoria
 - Sar Street, Pipitea
 - Rhodes Street, Newtown
 - Rintol Street, Newtown
 - Mein Street, Newtown
 - Tirangi Road, Rongotai
 - Mamari Street, Rongotai
 - Te Whiti Street, Kilbirnie
 - Brighton Street, Island Bay
 - Hataitai Road, Hataitai
 - Eagle Street, Karori
- d) A number of routes have been shortened because on closer interrogation of the data the full length is unnecessary. These include:
- Abel Smith Street, Te Aro, western end pedestrian only portion of street
 - Centennial Highway, Ngauranga, length of road with no buildings
 - Park Road, Miramar, length unnecessary.
 - Dixon Street - western end pedestrian portion only
- e) A number of routes can be removed because either new information on a URM building has become available that means it can be deemed low risk, and/or further testing of the route against MBIE guideline has meant that Council is satisfied that the route can be removed. The following streets /roads are included:
- Barker Street, Te Aro
 - Fifeshire Street, Te Aro
 - Martin Square, Te Aro
 - Part of Arthur Street, Te Aro
 - Part of Buckle Street SH1, Mt Cook
 - Hawkestone Street, Thorndon
 - Leeds Street, Te Aro
 - Hobson Crescent, Thorndon
 - Charlotte Ave, Brooklyn
 - Waipapa Road, Hataitai
 - Bute Street, Te Aro
 - Fancourt Road, Karori
- f) In response to feedback and new information since the consultation phase, the following streets are recommended to be added:
- Part of Waterloo Quay, Pipitea – railway station fall zone
 - Victoria Street, Te Aro – construction type and fall zone for URM building
 - Johnston Street, Wellington Central – new information about construction type
 - Featherston Street – Wellington Central - new information about construction type and railway station fall zone
 - Part of Karo Drive, Te Aro – URM building on corner site
 - Edward Street, Te Aro – information about construction type

- Oriental Parade, Oriental Bay –new information about construction type

Impact of recommended changes

21. The recommendations in this report reduce the overall number of high priority earthquake prone buildings as outlined below:

As per consultation

- The recommended routes included in the consultation document identified 333 priority buildings. A total of 117 had existing S124 earthquake prone building notices that expired before June 2027, and therefore would not be affected by the reduced timeframe required by legislation. The remaining 216 buildings were identified as priority buildings. Of the 216 priority buildings, 91 were on emergency transport routes and 125 on high traffic routes.

After Consultation

- The recommended routes included in this paper identifies 300 priority buildings. A total of 109 have existing S124 earthquake prone building notices that expire before June 2027, and therefore will not be affected by the reduced timeframe required by legislation. The remaining 191 buildings identified as priority buildings under the routes identified in this paper will have to operate to a shorter 7.5 year timeframe for remediation from when they receive notice they are a priority building. Of the 191 priority buildings, 82 are on emergency transport routes and 109 on high traffic routes.

Other recommended responses to feedback

22. The majority of submitters – in addition to providing feedback on the proposed routes – also requested greater support from local and or central government around funding mechanisms to support building owners meet the requirements of strengthening within a shorter period of time.
23. The Council currently provides a rates remission for when a building is empty during strengthening work, a rates remission for when a building is removed from the earthquake prone building list and building consent subsidies for strengthening work. In addition the Council has a \$500,000 Built Heritage Incentive Fund that can be applied to for funding.
24. As part of the draft 2019/20 annual plan process, the Council is proposing to increase funding support to \$1m per year through two separate funds to capture a broader range of earthquake resilience projects. It is expected the funds be allocated and focused on the following areas:
- \$500,000 towards supporting building owners who need it most to meet associated costs relating to earthquake prone heritage buildings and heritage conservation projects eg. obtaining heritage advice
 - \$500,000 towards supporting building owners who need it most to meet associated costs relating to earthquake strengthening their buildings eg. engineering assessments, traffic management plans for construction etc.

20. The funding criteria for both funds will be developed in detail in the coming months and reported to Committee for decision in August 2019. It is anticipated that funding will be directed towards buildings where successful heritage and resilience outcomes would be unlikely without assistance. Building owners are expected to be able to apply to more one grant / rates rebate scheme.
25. The Council will also explore establishing an enhanced advisory service to support the priority building programme. A similar programme was established as part of the Unreinforced Masonry programme of work, and the lessons learnt from that project will be used to design and scope the advisory service for the priority building programme of work. Any funding implications will be considered as part of the 2020/21 annual plan process.
26. In addition to the above, the Council will also continue to liaise with MBIE and advocate to central government for funding mechanisms to be developed urgently that can support building owners in Wellington and around New Zealand who are impacted by the reduced timeframes for remediation.

Options

27. The Act identifies Wellington as a high risk region and requires the Council to identify priority buildings for remediation. It must do that by identifying high traffic and emergency routes in the city.
28. The Council has the option to adopt the high traffic and emergency routes as recommended in this report, make amendments to the routes recommended in this report, or adopt the routes identified in the Statement of Proposal without any changes.
29. The Council must adopt a position on these routes as this is required under the Act.

Next Actions

30. Once the Council has agreed high traffic and emergency transport routes, officers will notify all affected building owners by December 2019 that they own a priority building.

Attachments

Attachment 1.	Attachment 1: Community Feedback ↓ 	Page 80
Attachment 2.	Attachment 2: High Priority and emergency Routes (maps) ↓	Page 124
Attachment 3.	Attachment 3: High Priority and Emergency Routes (names) ↓ 	Page 138

Author	Baz Kaufman, Manager Strategy
Authoriser	Mike Mendonca, Chief Resilience Officer David Chick, Chief City Planner

SUPPORTING INFORMATION

Engagement and Consultation

Consultation on high traffic and emergency routes was undertaken using the Special Consultative Procedure. 53 written submissions were received, 9 oral submitters were heard and circa 50 people attended a public meeting in the CBD.

Treaty of Waitangi considerations

There are no implications.

Financial implications

There are material financial implications for building owners of earthquake prone buildings. Being identified as a priority building reduces the timeframe for remediation and can increase costs.

The costs to Council are outlined in the report. The report notes that an additional \$500,000 per year is being consulted on through the draft 2019/20 annual plan to support the strengthening and broader resilience programme. It also notes that an enhanced advisory service is being considered and may increase costs in the future.

Policy and legislative implications

Setting high traffic and emergency transport routes is a legislative requirement under the Building Act 2004 (the Act) – amended by the Building (Earthquake-Prone Buildings) Amendment Act 2016.

Risks / legal

The Amendment Act brings in a nationally consistent approach to managing the risk from EPB buildings, and places a requirement on Council to identify buildings that must be remediated as a priority.

Section 133AF(2)(a) of the Act requires the Council to identify thoroughfares in the city onto which parts of an unreinforced masonry building could fall in an earthquake and that has sufficient pedestrian or vehicular traffic to warrant prioritisation of identification and remediation of those parts of unreinforced masonry buildings.

The Council can also identify transport routes of strategic importance (in terms of an emergency response).

The Statement of Proposal that was consulted on under the Special Consultative Procedure following legislative requirements and MBIE guidelines were used in setting high traffic and emergency routes.

The Statement of Proposal and final recommendations have been reviewed by Council lawyers.

Climate Change impact and considerations

NA

Communications Plan

Once final emergency and high traffic routes are agreed, affected building owners will be notified.

Health and Safety Impact considered

This project is legislatively required and aims to reduce the risk to Wellingtonians from an earthquake.

Attachment 1

Earthquake-prone priority buildings proposal

Key issues and themes from submissions

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Introduction

The Council consulted on earthquake prone priority buildings in October and November of 2018. A total of 53 written submissions were received and a further 9 oral submitters presented their views to Committee in November 2018.

The consultation document and supporting submission form asked for people's position on:

- the proposed high traffic routes
- the proposed emergency transport routes
- whether the Council had been over-inclusive, or left out areas that should be included as either high transport or emergency routes
- how the Council could best support building owners

The submission material and process also provided the opportunity for people to raise any other matters relating to the Council's statement of proposal on earthquake-prone priority buildings.

This paper provides an overview of the key themes and issues emerging from the consultation. It also provides an officer response where appropriate.

The below includes excerpts or summarised comments from submissions on key issues and themes from the consultation.

For a complete list of submissions and full submissions, please visit the website Wellington.govt.nz

High Traffic Routes

Support for the routes centred on Wellington being densely populated and highly pedestrianised, that it will improved Wellington’s overall resilience, and that the consequences associated with not carrying out strengthening work as early as possible should an earthquake happen would result in significant loss of life.

Opposition focused on the inclusion of specific streets or laneways, the treatment of the entire CBD as a high traffic area, that the threshold to determine a high traffic route (1000 vehicle movements per day) was too low and resulting in too many routes being identified, and that private roads/laneways should not be included (eg. Egmont Street). Some submitters also voiced opposition to the inclusion of ‘potential’ earthquake prone buildings and identifying the CBD as a high traffic area.

The below provides some excerpts / summarised views of submitters who provided commentary on high traffic routes. Officer comment is provided where appropriate.

For all full submissions, please visit the website Wellington.govt.nz/have-your-say/consultations

<i>Submitter/s</i>	<i>Submission overview</i>	<i>Officer response / recommendation</i>
Marlo Bromley	Wellington is densely populated and a lot of people walk around town. Priority routes are captured well.	-
Wilton Residents’ Assoc.	It seems important to carry out this work both from a public safety point of view but also to assure people thinking of moving here or setting up business here that we are reasonably protected from earthquakes despite the high earthquake risk classification.	-
Christopher Butler	Egmont Street, Te Aro, should not be classified as a high traffic route as it is a privately owned laneway with limited pedestrian and vehicular traffic.	Council has the ability to identify a privately owned laneway because it could be considered as an ‘other thoroughfare’ in the legislation. Egmont Street is included as it has a number of URM buildings along the laneway and it meets the MBIE criteria given it is an area with shops and a café/restaurant.

Esther King	We've experienced the ChCh earthquakes and know the intensity and immediacy of a huge earthquake under the city. A lot of people will be killed or maimed by the earthquake prone buildings in the Wellington CBD if they're not addressed before an earthquake hits Wellington.	-
Property Council NZ	The Property Council supports the proposed high traffic routes however we ask that the Council provides more information, supported by proper pedestrian and traffic counts, to help determine whether they warrant prioritisation.	Traffic counts are taken at specific sites along the city's transport network on a regular basis to determine overall traffic volumes. These traffic count results are also used to model traffic movements on neighbouring streets and roads to where the count took place. The traffic counts and the traffic modelling that is undertaken from the results provides Council with a robust picture of traffic volumes in the city.
Richard Jackson	You should cover as much of the city as possible with urgent remedial works to lower risk to human life. When you encourage pedestrian friendliness in areas (like Egmont Street) you should add these areas to the covered routes.	Egmont Street is included as it has a number of URM building's along the laneway and it meets the MBIE criteria given it is an area with shops and a café/restaurant.
Elin Lloyd	Agree with the high traffic routes and emergency transport routes	-
Jean Ellis	Included are some small streets and lanes that cannot possibly be high traffic routes, such places as Egmont St, Eva St, and even some dead end streets, excluded are some busy roads like Victoria Street that should have been included. Drawing a line around the CBD seems to have been a lazy way out and included small streets and lanes.	Egmont Street and Eva Street are included given these laneways are area's with shops, cafes, restaurant and bars. Victoria Street has now been included in the list of streets as a URM EPB building has been identified on this street. Victoria Street has over 1000 traffic movements per day, is a bus route and meets the high traffic route criteria in the MBIE Priority Routes guidance on numerous points.
Nick Pinfold	Your cordon counts are being used to get incorrect result. How can small dead end streets such	When an unreinforced masonry building

	<p>as Boston Terrace, Palmer street to name a few on the list have high traffic counts. Large roads such as able smith street have high counts up to the motor way but is not a major traffic route from the light up to the end/ The map shows marks the top of able smith street which goes up the hill and is not accessible by car. The Larger roads should have additional information gathered so only the busy portions can be mapped.</p>	<p>is located on a street identified as high traffic, and that building is also on a corner, the street perpendicular to the high traffic route is also identified. Aro Street is identified as a high traffic route and has a URM building located on the corner of Aro and Boston Street, hence Boston Street is identified. Willis Street is identified as a high traffic route and has a URM building located on the corner of Willis and Palmer Street, hence Palmer Street is identified. To address this confusion, both the lengths of Boston Terrace and Palmer Street have now been shortened to identify only the length of the perpendicular street where they URM building could fall.</p> <p>Abel Smith Street – for simplicity whole streets have been identified for the purpose of high traffic routes, however we note that the portion of Abel Smith Street that goes up the hill and is not accessible by car, can be withdrawn given there is no URM buildings along that portion of the street.</p>
<p>Vivienne Tovey</p>	<p>Minimize routes to reduce financial impact on as few building owners as possible</p>	<p>-</p>
<p>Shane Joyce</p>	<p>I don't believe private roads and lanes should be included – eg Egmont St which although has an agreement with WCC to allow thoroughfare access – it was an unconscionable bargain because now building owners are being punished and incurring significant extra expense for remedial work by not being able to close off the street to make EQ repairs/upgrade, despite buildings owning the actual land in front of the property.</p>	<p>Council has the ability to identify a privately owned laneway because it could be considered as an 'other thoroughfare' in the legislation. The public do use Egmont Street and it is included given that it is an area with shops and a cafes/restaurant...</p>

Vanessa Noble	No, there are too many high traffic routes. It should be broken down to high and medium traffic routes perhaps base on the current public transport network	Legislation requires Council to identify high traffic routes to determine priority buildings. There is no provision in the legislation for identifying 'medium traffic routes'. The high traffic routes have been identified by using traffic movements of 1000 movements per day, Council also included any public or school bus route when determining high traffic routes
Mo Greig	Seems very broad brush as the criteria do not reference the earthquake risk associated with each area, i.e. Berhampore is a low risk corridor	We consider the whole of Wellington as earthquake-risk and have not gone down to risk of each separate suburb.
Janet Hughes	More urgency should be accorded to structures and spaces that present an immediate danger. An obvious one would be the elaborate facades along Cuba St. if they can't be remediate urgently, something should be done to limit pedestrian traffic beneath them, and especially to stop people lingering in this narrow space.. I can't believe, for example, that there is newish children's play equipment immediately outside the obviously hazardous Workingmen's Club building.	Cuba Street is identified as a high traffic route and owners will have a reduced timeframe to remediate their buildings.
Insurance Council NZ	It is logical to identify priority buildings for remediation based on high traffic and emergency transport routes in the city and following consultation with the community. We do not have comments on the specific thoroughfares or routes proposed in the consultation paper.	-
Rachel Law	We agreed the Manners Street is certainly high traffic routes, but we do not agree Lukes Lane belongs to the proposed high traffic routes since James Smith car park has been closed since 2016 quake, and Amora Hotel is currently closed too.	When an unreinforced masonry building is located on a street identified as high traffic, and that building is also on a corner, the street perpendicular to the high traffic route is also identified. Manners Street is identified as a high traffic route and has a URM building located on the corner of Manners Street and Lukes Lane, hence Lukes Lane is identified. The length of Lukes Lane has now been shortened to identify only the

		length of the lane where the URM building could fall.
George Kanelos	At the consultation evening, it appears a 'blanket' approach has been taken to incorporate the whole CBD as being 'high traffic routes'. This isn't taking a 'risk-based' approach at all.	A 'blanket' approach has been taken with the CBD, however only the streets/thoroughfares within the CBD that have an URM building on them have been identified.
Wellington Electricity	WELL supports the proposed High Traffic Routes as they are based on robust survey data; they align with standardised MBIE guided criteria; and inform prioritisation scheduling regarding WELL's Earthquake-Readiness Programme to help ensure people are not hurt.	-
Inner City Wellington	Not all of the routes should be classified as high traffic routes. WCC has used 1,000 car or pedestrian movements as the threshold, but it does not have data on all streets and where there is no data, the street is included under the precautionary principle without any assessment of the risk.	The Council uses the best traffic data available to determine high traffic routes. Traffic counts are undertaken on key routes on a regular basis and traffic volumes are modelled on nearby routes In response to submissions, a further more detailed risk assessment of key streets has now been undertaken and this has resulted in some streets being withdrawn.
Inner City Wellington	The description of use of high pedestrian areas and high traffic routes in the Guidance does not justify identifying Barker St and Fifeshire Ave (both dead end streets) as high traffic routes. There are no concentrations of people in those streets, they are not transport hubs or areas of shops, cafes, restaurants, bars, theatres and malls. It seems no other assessment has been undertaken of the type of buildings in the street and the traffic that is generated by normal use. On Egmont St, the two buildings in the EQPB Register have already been part of the URM facades and masonry process. How can there be more parts on those two buildings that present a risk?	Council agrees that Baker Street and Fifeshire Ave should be removed from the list of High Traffic Routes. These routes do not have more than 1000 movements per day, they are not bus routes, they are dead end streets and do they not convincingly meet any of the high traffic route criteria in the MBIE Priority Routes guidance. The Egmont Street buildings that were included in the URM Order In Council have undergone work to secure the

		most vulnerable parts of the building, parts of the façade and parapet connections. The requirements for the EPB legislation are more onerous than the URM Order In Council. URM buildings identified under the Priority Building process are required to strengthen the parapet and entire front façade of the building. The URM Order in Council only required the parapets, roof level façade connections and top story floor level façade connections.
Inner City Wellington	<p>MBIE guidance (p18) says that ‘thoroughfares meeting the criteria must also have a URM building location on them whereby there is the potential for a URM part to fall onto the identified thoroughfare. WCC must have identified at least one part of a URM building that is likely to fall’ just having a URM building on the route in not sufficient.</p> <p>Streets have been included that have no earthquake-prone URM buildings as officers say these CBD streets have URM buildings on them with status of potentially earthquake-prone, yet to be assessed and not earthquake-prone. These streets include: Arthur St, I St, Buckle St, Claytons Ave, Garrett St, Feltex Lane, Leeds St, Lukes Lane.</p> <p>The earthquake-prone building on each of Bute St and Garrett St has a construction type of ‘Other’; the buildings on Allen St, Boulcott St and Garrett St have construction type of ‘Pre 1976, ≥ 3 storeys or ≥ 12m (other than URM)’. Why have these streets been included?</p> <p>We have not looked at the suburban streets in detail, but note that Evans Bay Parade, which is a high vehicle traffic route, does not have any earthquake-prone buildings of any type.</p>	<p>A review of every URM building will be made by officers as to whether the URM building or part of the building will fall on to the route before it is determined as priority via high traffic and a new EPB notice issued. Council has not reviewed every building at this level of detail yet.</p> <p>The MBIE guidance was largely written with the TA in mind who is starting their assessment process from the beginning. There is not an expectation that TA’s should have identified and confirmed all their EPB’s before they go out to consult on Priority Buildings. Territorial Authorities are only required to consult and identify potentially EPBS in their district before the legislative timeframe.</p> <p>Arthur Street - Taranaki Street is identified as a High Traffic route and there is a URM EPB on the corner of Taranaki and Arthur Street, hence it has been included.</p>

		<p>Balance Street – Balance Street has been included in the proposed routes for various reasons. There is URM EPB located on the corner of Maginnity Street and Balance Street. Balance Street has 1000 or more traffic movements a day and Balance Street and Maginnity Street meet the MBIE criteria in number of ways.</p> <p>Buckle Street - Part of Buckle Street SH1 has now been removed because there are no URM buildings along this portion of the route.</p> <p>Claytons Ave - When an unreinforced masonry building is located on a street identified as high traffic, and that building is also on a corner, the street perpendicular to the high traffic route is also identified. Vivian Street is identified as a high traffic route and has a URM building located on the corner of Vivian Street and Claytons Ave, hence Claytons Ave was included. Claytons Ave has now been shortened to identify only the length of the street where the URM building could fall.</p> <p>Garrett Street – Garret Street has a URM EPB building on it and meets the MBIE criteria given this is an area with shops, and a restaurant/bars.</p> <p>Feltex Lane — Feltex Lane has been</p>
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		<p>included in the proposed routes because there is a URM EPB located on the corner of Feltex Lane and Victoria Street. The length of Feltex Lane has now been shortened to identify only the length of the lane where the URM building could fall.</p> <p>Victoria Street has over 1000 traffic movements per day, is a bus route and meets the MBIE criteria on numerous points.</p> <p>Leeds Street – Leeds Street has a URM building on this street which has been categorised as low risk therefore this street has been removed. .</p> <p>Lukes Lane - When an unreinforced masonry building is located on a street identified as high traffic, and that building is also on a corner, the street perpendicular to the high traffic route is also identified.</p> <p>Manners Street is identified as a high traffic route and has a URM building located on the corner of Manners Street and Lukes Lane, hence Lukes Lane is identified. The length of Lukes Lane has now been shortened to identify only the length of the lane where the URM building could fall.</p> <p>Bute Street – WCC agrees. This street has now removed from the list of High</p>
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		<p>Traffic Routes.</p> <p>Evans Bay Parade – there is a URM EPB on Evans Bay Parade, hence it has been included.</p>
Ash McCrone	Why is Oriental Parade not connected to Evans Bay and CBD on the maps?	<p>Oriental Parade has now been included as a high traffic route. It has URM buildings along the route, has over 1000 movements per day, is a school and public bus route and meets the MBIE criteria on numerous points.</p>
John Perera	There may be many other buildings not in your list that may cause collapse and I may ask whether the Wellington railway Station is in your list of priority buildings. I have not seen it strengthened over the past forty years.	<p>Bunny Street has been identified as a high traffic route. The railway station is located on Bunny Street.</p>
Hugh McGuire	High traffic routes options and choices to consider are Aotea Quay, Hutt Road, Oriental Terrace, Inner city bypass from the Basin to the tunnels which'll be safe to drive through following it's strengthening in 2012, Adelaide Road, Brooklyn Road, Tinakori Road and Taranaki Street.	<p>Aotea Quay – No URM buildings along this street.</p> <p>Hutt Road – Hutt Road, Kaiwharawhara is included as a high traffic route.</p> <p>Oriental Terrace – Oriental Terrace has not been included, it does not have URM building on this street. Additionally, this street does not have more than 1000 movements per day and does not meet any of the high traffic route criteria in the MBIE Priority Routes guidance.</p> <p>Inner city bypass from the Basin to the tunnels – Parts of roads around the Basin connecting to both tunnels have been included where there is a URM building located along the route.</p> <p>Adelaide Road – this road is included as</p>

		<p>a high traffic route.</p> <p>Brooklyn Road – this road does not have any URM buildings located along it.</p> <p>Tinakori Road – this road is included as a high traffic route.</p> <p>Taranaki Street - this road is included as a high traffic route.</p>
Jacob Doherty	Consider the inclusion of College Street, Te Aro as a 'High Traffic Route'. Due to the proximity of the Moore Wilsons complex, several popular retail outlets and cafes as well as a gym this street becomes extremely busy with both pedestrian and motor vehicle traffic at peak times.	According to WCC information, there is no URM buildings located along College Street, therefore it has not been included in the list of High Traffic Routes.
Sam Bunglebob	All affected buildings are a priority.	-
Christopher Butler	Blanket categorisation results in anomalies being overlooked, and/or created. Egmont Street, for example, is not a public thoroughfare.	Council has the ability to identify a privately owned laneway because it could be considered as an 'other thoroughfare' in the legislation. The public do use Egmont Street and it is included given that it is an area with shops and a cafes/restaurant..
Geoffrey Lee	We do not see Fancourt St Karori as a high traffic route. It is a narrow with a limited entry to and from Karori Rd. Traffic volumes are relatively low and there are signs warning large trucks not to use the road. There are many alternative routes along Karori Rd to reach Friend St.	Fan Court Street has now been removed from the proposed list of high traffic routes.
Brooklyn Residents Assoc.	I note in your selection of streets you have included Charlotte Ave. Please note it is a cul-de- sac. We feel it is unlikely any building would collapse in an earthquake and block the road.	Charlotte Ave -ha now been removed from proposed list of high traffic routes.
Architectural Centre	There are some streets which appear to be anomalies. For example is the dead end Garrett St really a high traffic street? The policy aims to identify high traffic routes and emergency transport routes. We consider that it is pre-mature to identify these until after the PGWM strategies have been confirmed, as these are likely to affect traffic and transport routes.	Garrett Street – Garret Street has a URM EPB building on it and meets the MBIE criteria given this is an area with shops, and a restaurant/bar. LGWM proposal has been considered as part of the assessment of the High

		Traffic and Emergency Transport Routes.
Don MacLean	Underlying reasoning on choosing high traffic routes appears to be sound in my opinion.	-
Richard Arlidge	They appear sensible.	-
Clifford MacDonald	Should be reduced.	-
Wendy Booth	Lack of clarity on where Buckle Street is now, given the alteration of streets post Arras Tunnel and installation of footpath.	As a result of the alterations to the streets due to Arras Tunnel, there is now two Buckle Streets. Buckle Street SH1 runs from the eastern end of the tunnel from Sussex Street and finishes where it meets Karo Drive. A second Buckle Street runs along the front of the National War Memorial. For the purposes of high traffic routes, a part of the SH1 Buckle Street has now been removed because there are no URM buildings along this portion of the route. A portion of the Buckle Street that runs in front in front of the National War memorial to the eastern end was considered to be included however new information shows the URM building on this street has recently been remediated and deemed low risk.

Emergency Transport Routes

Fewer submitters commented on the emergency transport routes (in comparison to high traffic routes) and they were also generally also more positive. Opposition focused generally on the number of emergency routes (too many) and the financial impact on building owners along these routes. Some submitters also proposed alternative or additional emergency transport routes.

The below provides some excerpts / summarised views of submitters who provided commentary on emergency transport routes. Officer comment is provided where appropriate.

For all full submissions, please visit the website Wellington.govt.nz

<i>Submitter/s</i>	<i>Submission content</i>	<i>Officer response / recommendation</i>
Wellington Electricity	WELL strongly support the High Traffic and Emergency Transport Route initiative which will assist in securing critical transportation corridor functionality. As a consequence of the routes being identified, WELL will be better placed to restore supply to other key lifeline utilities (i.e. hospitals, and emergency services).	-
Wellington Electricity	The proposed Emergency Transport Routes identified in the PBSOP are considered to be appropriately identified – particularly in regard to their intended function in responding to an emergency event. Overall the emergency traffic routes are balanced and are considered to provide reasonable access to most of WELL’s critical sites.	-
Marlo Bromley	They seem to be concise. Priority routes are captured well.	-
Ash McCrone	The proposed routes look ok.	-
Richard Jackson	You should cover as much of the city as possible with urgent remedial works to lower risk to human life	-
Tasman Garden Body Corporate	Lack of clarity on where Buckle Street is now, given the alteration of streets post Arras Tunnel and installation of footpath. Clarification is sought on what route is considered to be the emergency route.	As a result of the alterations to the streets due to Arras Tunnel, there is now two Buckle Streets. Buckle Street SH1 runs from the eastern end of the tunnel from Sussex Street and finishes where it meets Karo Drive. A second Buckle Street runs along the

		front of the National War Memorial. For the purposes of emergency routes, the length of Buckle Street SH1 from the eastern end of the tunnel from Sussex Street and finishing where it meets Karo Drive remains included.
Mo Greig	I am assuming the sections of roads in Newtown and Mt Cook are routes to access the hospital. In which case they seem reasonable	Adelaide Road, Newtown is identified as an Emergency Route. There are no streets identified in Mt Cook as part of the emergency transport route network of streets.
Inner City Wellington	ICW agrees with the emergency transport routes for Te Aro and Wellington Central.	-
Insurance Council NZ	It is logical to identify priority buildings for remediation based on high traffic and emergency transport routes in the city and following consultation with the community. We do not have comments on the specific thoroughfares or routes proposed in the consultation paper.	-
Ash McCrone	It is commendable that the WCC is continuing to plan and improve the city's resilience for future emergencies, including earthquakes. I assume that in addition to imposing shortened timeframes for remediation, the proposed priority access routes will also be appropriately maintained with appropriate infrastructure (i.e. cleared of other potential obstacles that would hinder thoroughfare, ensure that pipelines, overhead electricity lines are earthquake and other disaster 'proof'), to act as key arterial routes for all emergency services, and vehicle and pedestrian traffic exit ways.	Council as part of adopting its 10 year plan in 2018 included significant additional funding to improve the resilience of its network infrastructure including the water network and the roading corridor.
Property Council NZ	We believe the Council has taken a fair and targeted approach to the areas identified	-
Vanessa Nobble	Yes to certain degree though there are too many emergency transport routes, which will have a major impact on the public and housings along those roads.	The buildings that are affected by the emergency transport routes are buildings which are determined as earthquake-prone. This group of buildings largely consist of buildings with a commercial nature or larger residential buildings with two or more stories containing 3 or more residential units within. It does not affect single unit home dwellings.

Matthew Wright	There is no evidence of this causing any issues during or after earthquakes, there has been no research or cost-benefit analysis to support this proposal which will create millions of dollars of costs to be burdened upon property owners at even shorter notice than was originally given. The goal posts should not be continually moved.	-
Elin Lloyd	Agree with the high traffic routes and emergency transport routes	-
Esther King	Yes. Hoping those near the coast and especially near the port survive a substantial localized earthquake.	-
Vanessa Noble	The council should considering another emergency route in/out of Wellington by developing a road in the southern coastal area by the old quarry – near the red rock.	-
Matthew Wright	Thompson St is on the list however it is a narrow road and Nairn St and Brookly Rd can also be used as alternative routes	Thompson Street has not been included as an Emergency Transport Route; however it has been included as a High Traffic Route because it has over 1000 traffic movements per day and meets the MBIE criteria is considered a well trafficked suburban street.
Johnny Scott	Mansfield Towers should be considered a factor that could compromise the integrity of the emergency routes at Tinakori Road in the event of a potential collapse given the unknown seismic resilience. Thus it should be included into the high priority earthquake prone identification category	This building is currently considered as 'not earthquake-prone.' If however it was identified as earthquake-prone at a later date via a new engineering assessment provided by the owner, and that assessment indicated that the building would have the potential to impede the Emergency Transport Route (Grant Road) then this building would be identified as a priority and given a reduced timeframe to strengthen or demolish the building.
Wilton Residents' Assoc.	Curtis Street/ Wilton Road between Churchill Drive and Chaytor Street possibly including Whitehead Road/Old Karori Road could be included in your emergency routes.	The Council worked with the Wellington Regional Emergency

	<p>This route provides an alternate access to Churchill Drive from town if the Wadestown route is blocked (use Aro Street/Raroa Road if Karori Tunnel is blocked) and a route from Karori to Churchill Drive. I don't know of any earthquake prone buildings on this route but landslips are a potential problem.</p>	<p>Management Office (WREMO) and emergency services to identify a staged approach to reopening transport routes in Wellington after an earthquake. Stage 1 (and Stage 1 alternate) are the proposed emergency transport routes for the purpose of identifying priority buildings. The remaining streets and roads (stages 2 – 4) to other suburbs and outlying areas will be re-opened in a phased way. Please note the streets suggested and their stages are noted below.</p> <p>Curtis Street - Stage 3 Wilton Road – Stage 3 Churchill Drive – Stage 3 Chaytor Street – Stage 4 Whitehead Road – Stage 3 Old Karori Road – Stage 3</p>
Architectural Centre	<p>The policy aims to identify high traffic routes and emergency transport routes. We consider that it is pre-mature to identify these until after the LGWM strategies have been confirmed, as these are likely to affect traffic and transport routes.</p>	<p>The LGWM proposal has been considered as part of the assessment of the High Traffic and Emergency Transport Routes.</p>
Hugh McGuire	<p>I'd support highways, motorways and arterial roads for emergency transport routes.</p>	-
Richard Arlidge	<p>They appear sensible.</p>	-
Jean Ellis	<p>This seems to have been well researched and I could see no problem with this part of the plan.</p>	-
Clifford MacDonald	<p>Should be reduced.</p>	-
Property Council NZ	<p>An assessment of the location of the critical infrastructure would be useful in determining which buildings should be considered a priority to ensure access to such infrastructure is maintained.</p>	-
Wendy Booth	<p>Lack of clarity on where Buckle Street is now, given the alteration of streets post Arras Tunnel and installation of footpath.</p>	<p>As a result of the alterations to the streets due to Arras Tunnel, there is now two Buckle Streets. Buckle Street SH1 runs from the eastern end of the tunnel</p>

		<p>from Sussex Street and finishes where it meets Karo Drive. A second Buckle Street runs along the front of the National War Memorial. For the purposes of emergency routes, the length of Buckle Street SH1 from the eastern end of the tunnel from Sussex Street and finishing where it meets Karo Drive remains included.</p>
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Proportionate / disproportionate response to the issue

A number of submitters expressed the view that the earthquake-prone priority building legislation is a poorly considered policy response to the Christchurch and an over-reaction. This theme was also strongly expressed at the public meeting where submitters voiced their concern that this was not a proportionate response to the risk.

Submitter/s	Submission content	Officer response / recommendation
Carol Brown	The Christchurch earthquakes in 2010 and 2011 were followed by what some of us believe was an egregious overreaction by the government of the day. Not sure the state (central and local government) understands the enormity of what they are demanding of ordinary citizens, most of whom have very ordinary resources. Some of us are prepared to take the risk rather than be made homeless or financially ruined.	<p>Wellington is built on a number of large fault-lines and is therefore exposed to considerable risk.</p> <p>This is recognised in legislation where Wellington has been identified as being situated in a high risk zone and the timeframes for remediating earthquake prone buildings is shorter than for other parts of NZ.</p> <p>The Council is required by legislation to identify high priority earthquake prone buildings and the reduced timeframe for remediation (7.5 years for priority buildings) is also set through legislation.</p> <p>GNS advice is that we have a 10 percent chance of a 7.5M on the Wellington fault line in the next 50 years (as well as other seismic risks). Up to 1800 fatalities are expected in that scenario; most of these will be caused by falling buildings. This advice informs the approach taken by the Council in determining priority routes.</p>
Architectural Centre	The Architectural Centre considers this policy to be an over-reaction to the legislative requirements. The council's response needs to be measured and proportionate to the actual risk, not react to uninformed perception.	
Laura Newcombe	I don't think council should take a blanket approach when funding is so difficult to obtain in these current times	
Hazel Kirkham	In the wake of the Christchurch earthquakes, the Government sold the legislation on the grounds of public safety. MBIE commissioned more than one analysis of costs versus safety benefits. A big problem with the analyses is that the 'building owners' who would bear the costs of strengthening or demolition, were perceived as being commercial building owners.	
Matthew Wright	There is no evidence of this causing any issues during or after earthquakes, there has been no research or cost-benefit analysis to support this proposal which will create millions of dollars of costs to be burdened upon property owners at even shorter notice than was originally given. The goal posts should not be continually moved.	
Historic Places Trust	We wonder if too many routes have been identified, although we accept the Council has applied various criteria such as traffic and pedestrian counts	
John Perera	Most of these buildings on your list have stood the test of time. I mean one hundred years or more. They may stand for another hundred years without strengthening.	
Sam Bunglebob	If there's any risk to the public at all, then all situations have the same priority level.	
Chetan Sukha	Over-inclusive	
Insurance Council NZ	ICNZ has supported amendments to the Building Act 2004 to give stronger emphasis to earthquake prone building and how they are managed, including the 2016 amendments that gave priority to buildings that are considered to pose a higher risk.	

<p>Wilton Resident's Association</p>	<p>It seems important to carry out this work both from a public safety point of view but also to assure people thinking of moving here or setting up business here that we are reasonably protected from earthquakes despite the high earthquake risk classification.</p>	<p>The Council believes the approach taken to setting high traffic and emergency transport routes in the city is an appropriate response to the risk the city is exposed to and commensurate with the requirements of legislation.</p>
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Public vs private benefit

This issue was a significant theme throughout the consultation and was a strong area of debate at the public meeting – that reducing the risk to the public from buildings is a public good and should be supported with public funding.

This section should be read in conjunction with support for building owners (financial / non-financial).

<i>Submitter/s</i>	<i>Submission content</i>	<i>Officer response / recommendation</i>
Carol Brown	Surely justice demands that the public helps to pay for its own safety. It is asking the few to fund for the many	The purpose of the legislation is to ensure that private buildings do not collapse onto public areas endangering the lives of people using those public areas, or impeding an emergency response in the case of an earthquake event. The onus on building remediation rests with the building owner/s and Council's role is that of regulator, facilitating the process, and providing assistance where it can. Council support and financial assistance is covered in the section below.
Architectural Centre	We consider that the increased costs likely to be imposed on private building owners to be inappropriate. The policy means that WCC is externalising the costs of its responsibility to provide a safe public realm onto building owners who should not be burdened with the responsibility of ensuring safe roads and pedestrian thoroughfares and emergency vehicle thoroughfares.	
Elin Lloyd	It really seems to me that this is something the council should be funding as part of its duties to protect public safety, rather than expecting civilians to shoulder the burden.	
Hazel Kirkham	Reduction of earthquake risk is a public good. Public goods should be paid for from the public purse and delivered by the government or TAs. The legislation, at least as it impacts private home owners, is iniquitous – grossly unfair and morally wrong. Its consequences are perverse.	
Ash McCrone	Currently individuals are being required to privately fund expensive mandatory seismic strengthening works for a public good.	
Blythwood Association	We have previously raised the alternative of financial assistance in various forms at both local and national government levels. We depose that if the public authorities wish to protect and assist the public in the event of an emergency, which is a laudable object and no more than part of their role, it seems not unreasonable for them to take on board some or all of the financial burden that entails.	
Wilton Residents' Assoc.	There is likely to be an impact on council expenditure – we can't really comment on this without knowing the amount – but we are aware that rates are a significant burden on some of our residents.	

Support for building owners (financial)

Earthquake prone building owners expressed strongly held views that government (central and/or local) needed to provide financial support in one way or another in order to achieve its stated objective of having priority earthquake prone buildings remediated in 7.5 years. There was a strong sense that there was a public good element to strengthening work and that therefore government support was appropriate, but also, that without support, building owners would not be able to meet the deadline for remediation. Ideas put forward included: lender of last resort facility, grants, suspensory loans, interest free (or low) loans, tax rebates on capital works, waived consent fees, rates rebates, buying owners out at agreed valuations, providing incentives for doing work earlier (than 7.5 years).

Submitter/s	Submission content	Officer response / recommendation
Christopher Butler	Provide (or support the provision of) financial instruments such as targeted rates, lender of last resort facility, grants, suspensory loans, tax rebates etc which reflect 'public good' outcomes.	<p>A number of submitters have argued for Council (and/or government) to move beyond their legislation setting and regulatory functions, and provide financial assistance to building owners to support remediation works.</p> <p>Use of ratepayer funding to support the earthquake strengthening of private buildings at the scale envisaged by some submitters is not possible or supported by Council.</p> <p>Notwithstanding the above, Council does recognise that the new legislation places significant pressure on building owners, and more support is required to ensure the accelerated priority building remediation programme is successful. The following actions are supported:</p> <ul style="list-style-type: none"> new criteria for the \$500k
Heritage NZ	HNZPT support a comprehensive support package for building owners, including owners of heritage buildings. HNZPT seeks to ensure that any support package is clearly detailed as relates to heritage buildings and non-heritage buildings, including a range of support methods. HNZPT recommends that any support made available is undertaken in a coordinated way.	
Carol Brown	If the intention to strengthen dwelling places goes ahead, the costs should be met largely by the state	
Matthew Wright	Council should provide support by providing free building & resource consents when required, and contributing towards costs the building owner incurs as a result of this legislation	
Architectural Centre	The level of Council rates rebate needs to be clearly articulated and communicated to priority building owners. We ask that the WCC lobby central government for a tax rebate on the cost of strengthening buildings, with higher rebates for heritage buildings.	
Richard Jackson	Council should fine building owners not undertaking the work and use the funds to do the work on their behalf.	
Ash McCrone	If the Government & Council have mandated seismic strengthening, the Council should financially compensate owners that would be required to remediate their buildings in order to comply with the proposed shortened timeframes, or buy owners out at an agreed valuation.	
Don Maclean	It is unrealistic to expect property owners to be able to afford upgrading to compliance without financial assistance. Especially if a reduced timeframe is enforced because the building falls within one of the proposed areas.	
Esther King	Council has already given a lot of time and presumably those buying or owning buildings know what	

	they're getting into with the long-known Wellington risks for earthquakes. Perhaps an incentive for buildings that are fully remediated quickly eg. by the end of 2020. Those who do not complete the job within the 7.5 years should be fined to provide a pressure to get it done, to protect people and to be fair to those owners who have done the right thing in a timely manner	<p>Built Heritage Incentive Fund to ensure it is targeted to those that most need it (already in the draft 2019/20 annual plan)</p> <ul style="list-style-type: none"> • a new \$500k per year resilience fund to support building owners meet associated costs relating to earthquake strengthening their buildings eg. engineering assessments (already included in the draft 2019/20 annual plan) • an enhanced Council advisory service to help guide building owners through the accelerated earthquake strengthening process • active lobbying of central government to provide financial assistance tools to owners of earthquake prone buildings • continuation of the various Council rates rebate schemes for buildings that are needing to be earthquake strengthened.
Richard Arlidge	I think the WCC is making a reasonable fist of it. At central Government level they should have looked closer at the tax/cost deductibility of the situation if they really wanted to encourage people to remediate asap but, alas, that horse has long since bolted.	
Mo Greig	This could be in grants or interest free loans. As a non-resident recent changes to the law mean I cannot borrow money from a bank in NZ	
Rachel Law	We would like City Council approach the request to Central Government if IRD can consider the cost of strengthen as tax deductible expense. And our rate can be waived during the strengthening period	
Elin Lloyd	I feel meaningful, fiscal support will be needed for us struggling homeowners who are just not going to be able to fund this at all on our own. I feel the council really needs to just step up and contribute in the most straightforward and meaningful way which is financially, and since it would end up being the governments paying anyway in the aftermath of a disaster I feel it should just step up and take preventative responsibility while it really matters.	
The MPI Trust	The only solution I see is guaranteed loans available at low interest rates that can be amortized over 30 years or more so owners can somehow cash-flow manage these upgrades. Finally I have no problem with what society is trying to achieve in reducing loss of life in the event of an earthquake but making these decisions then leaving the building owners hung out to dry to fund societies decisions is unfair.	
Vivienne Tovey	Long term low interest loans	
Inner City Wellington	<p>Provide WCC targeted financial assistance mechanisms and programme support to help owners undertake the complete project wherever possible in the absence of a Government scheme or to complement a Government scheme.</p> <p>WCC must lobby Government and Coalition partners to establish Lender of Last Resort mechanisms, tax relief, programme advisory support to enable all mandatory seismic strengthening projects to be progressed and completed.</p> <p>WCC to provide targeted financial assistance mechanisms and programme support to help owners undertake the complete project wherever possible in the absence of a Government scheme or to complement a Government scheme. Also consider progressing the Strategic Housing Investment</p>	

	Programme outlined in the Long Term Plan 2018-2028 to provide an option for owners of earthquake prone buildings (where the costs are unaffordable and uneconomic for owner-occupiers).	
Ash McCrone	The Council, and the NZ Government, need to seriously rethink the 'support' that is currently offered for strengthening, and indeed the whole EPB issue. This is not just a Wellington problem. The incentives to strengthen earthquake-prone buildings currently offered by the Government & Council are insufficient.	
Angelos Argus	Pay for all expenses and losses incurred in meeting the requirements of the Council	
Chetan Sukha	Helping further with costs to remedy on the property – quick alternatives to remedy – Tax rebate	
Laura Newcombe	My recommendations to help alleviate the financial burden would be for the Council/Government to offer a grant to struggling heritage building owners like myself (based on assessment of individual circumstances), the Government to collect zero GST on strengthening work, and zero interest loans for a 10 year duration to help someone like myself who is greatly battling to come up with funds to complete remedial work to the deadline	
Eric and Betty Cornick	Give adequate financial assistance! Rates remissions and building consent subsidies don't cut the mustard! Also give a reasonable time frame! We have just been through the URM process for parapets and facades and found the experience very stressful given the time frame and lack of resources ie. engineers and builder's! We've no sooner completed this work than we've been hit with further requirements! Will this be the end of it or will there be more?! The financial burden of continuing strengthening work has and is going to cause us significant hardship and stress	
Vanessa Noble	Building consent for earthquake strengthening works should be waived completed or nil rather than just subsidising, as building owners have to bear all financial burden of high strengthening costs and no income.	
George Kanelos	Being a non-heritage building as well, means we have had no access to any funding to-date. This needs to change if you want to retain Wellington as a vibrant and resilience city to live in.	
Barry McEwen	Free consents & permits.	
Geoffrey Lee	The Build Heritage Incentive Fund has helped with repairs to the Tower of St Mary's. A similar approach to the at risk buildings on high traffic/emergency routes would be welcomed. That is set up a fund to support the cost of repairs.	
Jean Ellis	Lender of the last resort	

Support for building owners (non-financial / other)

In addition to financial support, submitters were also supportive of Council providing non-financial support to buildings to help them achieve the deadline for priority buildings. Ideas put forward included: an advisory service that building owners could call on, and publishing information and guidelines for assessing and retrofitting EPBs. A number of submitters noted that they were not commercial building owners and didn't always have the necessary expertise to undertake complex capital works at the scale required and help was needed for some building owners and body corporates.

Submitter/s	Submission content	Officer response / recommendation
Marlo Bromley	Remove the need to upgrade fire and disabled access while strengthening a priority building and provide a step by step guide for building owners to help them understand the process of assessing and retrofitting EPBs.	As part of the Unreinforced Masonry programme of work, the Council provided an advisory service to building owners to ensure strengthening or remediation was undertaken within the required timeframes. Council will continue to provide an advisory service to meet the needs of the priority building programme of work. Initial planning around the scope and scale of the advisory service is currently being worked on and if there are any financial impacts associated with the enhanced advisory service these will be considered as part of the 2020/21 annual plan process.
Architectural Centre	The process for building owners who disagree they are a priority building needs to be clearly communicated.	
Christopher Butler	Support expert and well-resourced advisory services	
Heritage NZ	Ensure that the available information in support, such as guidance leaflets, and website content, clearly sets out the full range of options available, including HNZPT National Heritage Preservation Incentive Fund. HNZPT supports strengthening multiple building owners in a coordinated way, such as through initiatives to facilitate meetings with adjoining owners through the Earthquake Resilience Team at Council	
Inner City Residents Assoc.	Provide transparent information to owners on how WCC has identified a building on an emergency route as a priority building. Is WCC going to identify all earthquake-prone buildings on these routes as priority buildings until owners provide evidence to the contrary? What evidence will WCC provide to justify the identification as a priority building? WCC should be helping owner progress the full seismic strengthening project wherever possible to avoid ... loss of knowledge (with consequential additional costs) from changes of construction and Body Corporate personnel due to a delay between the 'part' strengthening and the full seismic project while the new personnel gather knowledge on the building.	

<p>Ash McCrone</p>	<p>Where strengthening is not feasible, the Government and Council should look to develop creative solutions, such as enabling pathways for partnerships with body corporates (BCs) and developers to build – e.g. a form of Kiwibuild - which would potentially enable more new good quality housing stock to be added.</p> <p>Will the WCC or the Government identify the common issues and concerns of building owners/BCs and develop technical guidance and legal advice to support all building owners and BCs? This would help standardise responses and save fees & costs building owners and BCs are facing.</p>	
<p>George Kanelos</p>	<p>We are lobbying hard and asking for local and central government to set up an advisory body to aid us with our projects. No one in my building works in the construction sector and the requirements and cost to comply with the legislation are both beyond both our skill-sets and finances respectively. We are a very different set of owners, a far cry from commercial property owners/developers who have resources at hand.</p>	
<p>Ash McCrone</p>	<p>Will the WCC or the Government identify the common issues and concerns of building owners/BCs and develop technical guidance and legal advice to support all building owners and BCs? This would help standardise responses and save fees & costs building owners and BCs are facing. We are not experts - but we are expected to find technical solutions, determine and navigate the legal and financial pathways to achieve those solutions, find ways to fund the work, and plan multi-million- dollar construction projects with potentially massive risks! The Government and Councils need to rethink the EPB policies and determine sound equitable solutions to support owners with the complexities and expense of seismic strengthening.</p>	
<p>Mo Greig</p>	<p>Technical support. There is a shortage of skilled people to carry out the work and as a result there are some unscrupulous practitioners taking advantage of this shortage. Having just completed remedial work to the parapet of our building I experienced just such a problem. I was bullied and lost \$10,000 as a result. Fortunately the council assisted me by finding project management and builders who were professional and ethical. Such a service for future work would be mandatory in my opinion.</p>	

Timeframes for strengthening

Submitters generally did not support the timeframe provision in the legislation. The feedback was that existing timeframes were already difficult enough to meet, and in many instances the new reduced timeframes for priority buildings would be very hard or impossible to meet because the engineering / construction sectors were not big enough to be able to complete all the work by the required deadline. Other submitters opposed the timeframe because existing rental agreements/financial arrangements allowed them to meet original deadlines, but not an earlier one.

Submitter/s	Submission content	Officer response / recommendation
Blythswood Association	If we are faced with the expense of doing so more rapidly than we have calculated then some of those who own flats in the building will be unable to meet their financial obligations in that regard. Some people might retort that those so affected have the alternative of selling their lease and moving to other accommodation but that is no solution and is, in any event, an unacceptable and hard hearted response. Borrowing money or moving elsewhere is not really an option for the elderly.	While the reduced timeframes are set through legislation and cannot be changed by Council, we will continue to liaise with government (through MBIE) and regularly update them on progress and issues with the priority building programme of work.
Inner City Residents Association	Reducing the timeframe by up to 7.5 years will have huge financial implications for owners in a time of capacity constraints and rising prices. All priority buildings have to present a real risk to public safety and emergency response access. This is particularly an issue for priority buildings on the emergency transport route as the whole building has to be strengthened within the 7.5 years. Council should Lobby the Government for flexibility on timeframes when capacity constraints and resulting rising costs place further unreasonable financial burdens on owners.	
Historic Places Wellington Inc.	We are very concerned at the scale and timeframes of this legislation/policy change, especially for owners of heritage buildings on the identified routes. There could be enormous pressure on private owners to find the financial resources and on the design and building industry to complete the necessary work in the short timeframe. We think this has the potential for changing some of the streetscapes of Wellington through demolition.	
Esther King	It's a when not if scenario. We're pretty shocked that it's already been 7 years and that this still gives another 7.5 years to fix. Wellington has long known the risks here and the Council and Govt need to get it sorted asap. It significantly reduces our visits to the CBD due to the dangers posed	

	by the earthquake prone buildings.	
Don Maclean	Maybe staged timeframes for remediation to allow realistic management of limited resources and manpower to achieve the desired outcomes.	
Sarantos Economou	We feel it is unfair that priority buildings need to be remediated within 7.5 years	
Chetan Sukha	Not changing from the original timeframes given as rental agreements have been set based on the timeframe to remedy. Budgets to remedy has been factored on the timeframes to complete.	
Laura Newcombe	Because of the revised time frames in your proposal, there is now even more financial pressure for me on top of the strengthening process to meet the Council's proposed deadlines.	
Heritage New Zealand	While the Building Act allows owners of Category 1 heritage buildings to seek an extension of time, HNAT supports and prefers seismic strengthening of heritage building within any identified priority routes to occur under the same timeframes as non-heritage buildings particularly where this can occur in a coordinated way.	
John Perera	We do not even have enough tradesmen to do these jobs. Charges of engineers and tradesmen are excessive. Please give people more time and help with costs.	

Heritage

Submitter feedback was that there needed to be appropriate levels of support for heritage buildings where remediation could be more challenging. Submitters also advocated for more technical advice from Council on heritage issues, and a number also noted that greater weighting should be given to safety if there was conflict between strengthening and heritage.

Submitter/s	Submission content	Officer response / recommendation
Heritage NZ	HNZPT support a comprehensive support package for building owners, including owners of heritage buildings	Heritage buildings hold historical value and the Council does not want to see strengthening work adversely affect the intrinsic value of these buildings. Council provides funding support through the Council's Building Heritage Incentive Fund (BHIF) and owners can also apply to the newly established Resilience Grant for additional funding support. Funding support from the Ministry for Culture and Heritage is also available. Owners of heritage buildings listed as a Category 1 historic place on the New Zealand heritage list, or included on the National Historic Landmarks, may also apply in writing to Council for an extension of up to 10 years to complete remediation work.
Historic Places Wellington	It is good that there is an opportunity for owners of Category 1 heritage buildings to apply for an up to 10 year time extension. But that still leaves Category 2 owners without this possibility.	
Historic Places Wellington	We are very concerned at the scale and timeframes of this legislation/policy change, especially for owners of heritage buildings on the identified routes. There could be enormous pressure on private owners to find the financial resources and on the design and building industry to complete the necessary work in the short timeframe. We think this has the potential for changing some of the streetscapes of Wellington through demolition.	
Nick Pinfold	Increase the heritage fund, provide technical resource.	
Laura Newcombe	As someone who is identified as owning a heritage building unit on your emergency/high traffic route, I need financial assistance to help me get over the line with these extremely high costs. I invite the council to look into my books and accounts and see what can be offered for someone trying their hardest to raise funds for this heritage building that Wellington values.	
Thomas Kriha	If there's a conflict between heritage and safety we should err on the side of safety.	
Ash McCrone	Owners and body corporates in non-heritage buildings where it is feasible to strengthen need the support that is available through the Built Heritage Incentive Fund and URM facades & parapets.	
Wellington Electricity	Another consideration that Council could take relates to a clear allowance being provided for modification to heritage buildings. Given the intent behind the PBSOP – WELL consider weighting should be given to the city's resilience to natural hazards as opposed to heritage protection. While the assistance for heritage listed building owners is noted in the PBSOP, it is felt that greater allowance to forgo strict adherence to heritage building modification constraints should be provided at the Statement of Proposal level of the initiative.	

Architectural Centre	We support the acknowledged need to protect heritage EPBs.	There are no restrictions on building owners applying – and receiving – financial support through multiple schemes listed above.
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Construction / legal / insurance / professional services market issues

A number of submitters observed that the market conditions were very tight and obtaining engineers in particular, was very difficult in the current market. Broadly, they felt that achieving the shorter timeframe for strengthening priority buildings would not be possible. The engineering sector and construction sector were tight with existing work, and a tight market would drive up costs further making strengthen even more difficult for owners.

<i>Submitter/s</i>	<i>Submission content</i>	<i>Officer response / recommendation</i>
Hazel Kirkham	This is a bonanza for engineers, architects, and quantity surveyors who produce reports of variable reliability as they struggle to deal with the flood of new work. As their clients have no professional experience in the field and are nervous and naïve, there is another income stream for the experts in peer reviews and second opinions. It's also a bonanza for materials suppliers and construction companies who are the biggest beneficiaries of this piece of legislation. Lawyers too benefit, assisting body corporates, (learning on they go along), to navigate the whole risky process.	<p>It is recognised that there is considerable complexity associated with remediating earthquake prone buildings. This is particularly the case for non-commercial building owners who traditionally do not have the background or experience to easily navigate the requirements associated with large capital projects.</p> <p>The construction market is currently also stretched acerbating the issue further.</p> <p>As noted above, Council is proposing to support building owners with an enhanced advisory service. The scope of that advisory service is currently being developed and if there are any funding requirements for that service this will be considered as part of the 2020/21 annual plan process.</p>
Ash McCrone	<p>There is reasonable concern that the construction industry is under stress. Some construction does not appear to be of the highest quality and there may be significant waiting times or delays getting construction underway. The lack of suitably qualified structural engineers, the specialised nature of the work, and the lack of qualified work force will impact on the number of upgrades that may be able to be undertaken, affect costs, and the quality of work.</p> <p>There may be a logjam of construction as it gets close to the 7.5 year deadline. The construction sector may struggle to meet the upsurge in demand as the time period for strengthening draws to a close. Will there be enough qualified work force available, with the quality oversight and compliance monitoring in place to cope with the increase in demand/number of buildings that require strengthening?</p> <p>Insurance is fast becoming unaffordable for EPBs. Insurance is limited already and does not even cover the rebuild of our apartments now – our cover is far from sufficient to enable reconstruction and full recovery.</p>	
Inner City	Reducing the timeframe by up to 7.5 years will have huge financial implications for owners in a	

Wellington	<p>time of capacity constraints and rising prices.</p> <p>Lobby the Government for flexibility on timeframes when capacity constraints and resulting rising costs place further unreasonable financial burdens on owners.</p>	
Wendy Booth	Insurance has gone up significantly and is harder to get for many	
Don Maclean	Also the shortage of builders and professionals associated with such work, already in high demand, is exacerbated by the reduced timeframes and the fact that this work is being enforced nation-wide, meaning overall costs are snowballing.	
Mo Greig	There is a shortage of skilled people to carry out the work and as a result there are some unscrupulous practitioners taking advantage of this shortage. Having just completed remedial work to the parapet of our building I experienced just such a problem. I was bullied and lost \$10,000 as a result. Fortunately the council assisted me by finding project management and builders who were professional and ethical.	
Elin Lloyd	As we heard multiple times in the meeting, the difficulty in sourcing engineers and actually getting the work done is hugely challenging, so even if we could pretend for a blissful moment that money were not an issue here, there is still no guarantee that work can be done on time if engineering firms have too much on their plates. We could be forking out huge amounts of money and doing everything right, but still left waiting endlessly for engineers to act, in which case will we be the ones penalised if deadlines are missed?	
George Kanelos	<p>The issue the council and central government have not taken into consideration with this current piece of legislation is: Where are the available resources to complete strengthening within 7.5 years</p> <p>In my mind there is too much on, given the timeframes allotted and I think central government and local government need to reassess what is a real priority given restricted resources. From that establish a proper framework/timelines, with staggered delivery dates (i.e. years apart) so that all works can be completed and that everyone can have access to the resources to complete their works.</p>	
Laura Newcombe	As you are aware, costs for seismic remedial work in Wellington (and throughout New Zealand) are incredibly unaffordable due to many earthquake strengthening deadlines, and other building projects such as Kiwibuild placing pressure on the small pond of resources available to undertake this work	
Carol Brown	Blythwood has had various contractors pull out over the years. It is not always easy to find	

	replacements. Money has been spent on specialists who then walk away from the project.	
John Perera	We do not even have enough tradesmen to do these jobs. Charges of engineers and tradesmen are excessive. Please give people more time and help with costs.	
Clifford MacDonald	It is almost impossible to put up a financial argument to the banks to fund the strengthening of city fringe buildings. I feel owners will have no option but to demolish a large proportion of the older Wellington commercial building landscape.	

Body corporate structure issues

A number of earthquake prone buildings are made up of (or include) multi-unit residential dwellings that are structured as a body corporate. Having multiple people own a building increases the complexity and level of difficulty when earthquake strengthening is required. Some of these difficulties are outlined in the submissions below.

<i>Submitter/s</i>	<i>Submission content</i>	<i>Officer response / recommendation</i>
Hazel Kirkham	<p>All body corporates with EPB problems are trying to figure out what to do with the challenge of complying with the legislation. Committees, volunteer owners ordinarily responsible for routine governance and maintenance, have become responsible for finding technical solutions, finding legal pathways to achieve those solutions, finding ways to fund the work, and planning multi-million-dollar construction projects with massive risks. As the work goes on year after year, if no solution is found, the pressure on those people is way beyond what should be expected of them, and the work is possibly beyond their capability.</p> <p>Wellington City Council, which is responsible for implementing the Building Act, offers body corporates some technical advice on compliance with the building code. Otherwise, there is absolutely no help available for body corporates. They are on their own.</p>	As previously noted, Council is proposing to support building owners with an enhanced advisory service. The complexities that body corporates can face in remediation will be considered when designing what that advisory service could look like.
Shane Joyce	More real help is needed for buildings with body corporates where the majority are held to ransom by a minority. WCC needs to attend AGMs and EGM relating to Eq upgrades and provide some guidance and support. Owners that wish to start the work should not be fined/punished by those that don't. Legal assistance would go a long way helping as many multi-unit buildings have the same problem. Eg: 20 Egmont St has 80% of owners wanting to start on remedial work but have been threatened with legal action by one owner (a lawyer) that believes WCC or Govt will fund such work in the future if we wait, and that there will be a miracle cheaper eq. alternative if we leave looking at it until the deadline.	
Wendy Booth (Tasman Garden Apartments Body Corporate)	Provide guidance on likelihood of obtaining resource consents for site intensification (for redevelopment to subsidize costs) and support a process that enables Body Corporate's to borrow the substantial funds required to redevelop and/or strengthen	

Other / miscellaneous

The following section outlines feedback on the consultation process, legislation, the impact and consequences of introducing the reduced timeframe on building owners and other miscellaneous comments from the consultation process.

<i>Submitter/s</i>	<i>Submission content</i>	<i>Officer response / recommendation</i>
Heritage NZ	Council needs to provide clear communications about timeframes for building owners where a building owner is identified in a high traffic route or emergency transport route, and the owner has already been serviced with a remediation notice under s124 of the Building Act.	All building owners affected by the establishment of high traffic and emergency routes will be notified. All notices will be sent by December 2019 as required by legislation.
Property Council NZ	We call on the Council to identify affected priority buildings and consult with specifically affected building owners before any final decisions are made about the emergency transport routes.	All building owners with earthquake prone buildings were contacted directly on two occasions as part of the Special Consultative Procedure on priority buildings. Further engagement will continue as part of the priority building programme as it develops.
Architectural Centre	We consider this important consultation to be both inadequate - largely due to insufficient information being supplied - and poorly timed for the following reasons: Setting routes is premature because of LGWM The consultation document did not include quantifiable measures (cordon counts) for all of the streets and footpaths listed Not clear whether the whole of the road is affected or only part of it. Impact of changing traffic volumes over time not covered. Will building form, sets backs inform identification of priority buildings.	Traffic counts and transport movement modelling was a key factor in setting high traffic routes. Let's Get Wellington Moving was also factored into the consideration of high traffic and emergency transport routes.

		<p>If a buildings is sufficiently set back from the high traffic or emergency transport route (1.5 x the height of the building) and it is not likely to collapse onto the route causing injury, death or impeding emergency services(in an earthquake event) it will not be considered a priority building.</p>
Inner City Wellington	<p>The Guidance (p16) says ‘public consultation enables communities to decide the appropriate level of risk to accept as a community, informed by their knowledge of the local economy, portfolio of buildings and their uses’. This information was not available for the consultation process.</p>	-
Wellington Electricity	<p>Matters that could be expanded upon within the document relate to better definition of building elements (i.e., not-URM elements) that do not present elevated risk to emergency traffic routes. From a more general perspective WELL considers defining a set of clear criteria informing building owners as to potential exemptions (or partial exemptions) to the priority building notification process is appropriate. Similarly, reference to an explicit set of criteria should be provided in the PBSOP where only partial URM remediation works could be undertaken (i.e., removal of a veranda, parapet, chimney, etc.).</p>	<p>A review of every URM building will be made by officers as to whether the URM building or part of the building will fall on to the route before it is determined a priority building.</p> <p>If an owner receives engineering advice which indicates that the building or part of the building will not fall onto or impede the identified route this information will be considered and the priority building designation reviewed on a case by case basis. Criteria for exemptions and extensions will be made available on the Council website shortly and</p>

		owners can work directly with our Advisory service for further support.
Architectural Centre	What non-NBS criteria will determine the qualifying “part[s] of a public road, footpath, or other thoroughfare in an area of medium or high seismic risk onto which parts of an unreinforced masonry building could fall in an earthquake” (s133AF(2)(a)(i)). For example will building form, set back, low pedestrian numbers inform the identification of a priority building on a high traffic route?	Building form and set back from the route will be considered before a building is determined as a priority.
Ash McCrone	Does the WCC (indeed the NZ Govt.) have accurate data on the number of earthquake-prone buildings and the costs involved in undertaking strengthening? The consultation document states that “over 5,000 buildings have been assessed since 2006, and just over a 1,000 have been identified as earthquake-prone”. However, the Register of earthquake-prone buildings data puts Wellington’s earthquake-prone buildings at 699.	Wellington has been active in identifying earthquake prone buildings in the city and requiring earthquake prone buildings to be strengthening for a number of years. Many buildings have already completed remediation or strengthening work. A total of 600 are identified as earthquake-prone at this point in time and still require to be remediation.
Angelos Argus	You have gone through a very expensive process upon the property owners to strengthen the facades of buildings which may also have a seismic prone classification. Are these buildings to be included in your present assessment. If so, this latest assessment will result in further high expense, disruption upon tenants and resulting in vacancies in the buildings selected. Why was this not done at the same time as the facades requirements?	The buildings that were included in the Unreinforced Masonry Order in Council March 2017 –Sept 2018 have undergone work to secure the most vulnerable parts of the building, parts of the façade and parapet connections. The requirements for the EPB legislation are more onerous than the URM Order In

		<p>Council. URM buildings identified under the Priority Building process are required to strengthen the parapet and entire front façade of the building. The URM Order in Council only required the parapets, roof level façade connections and top story floor level façade connections. Some building owners chose to do the minimum and some chose to do more.</p> <p>Special consideration and review will be given to all the URM buildings that were part of the URM Order in Council before they are determined as a priority building.</p>
Hugh McGuire	I support their policy of raising building standards towards a deadline because it has been pretty successful no matter how they try and do.	-
Geoffrey Lee	We agree with the concept of promptly remediating buildings that have unreinforced masonry which may fall onto priority traffic routes.	-
Hazel Kirkham	<p>Some owners will not be able to raise loans from high street lenders. Bankruptcy will quite possibly be our way out.</p> <p>If the decision is to demolish the buildings, then we might be lucky enough to walk away with some cash, but probably not enough to buy a replacement for the home we would have lost. Either way, the legislation would have taken everything we'd worked for, (and paid taxes on), for our whole working lives.</p>	-
Ash McClone	Will the owners in EPB actually be able to strengthen within the shortened timeframe, or will the city be facing a whole load of demolition sites and the associated consequences (court cases, limited availability of the construction sector to undertake works, increased pressure on tips with	-

	demolition material, homeless residents and other negative outcomes)?	
Ash McCrone	We are private home owners, not developers. The cost of strengthening is more than the value of the building and pretty similar to demolishing and building anew a 100% NBS block of homes. The assessed cost of these works and the return on the completed apartments make strengthening the building prohibitively expensive, and just not sensible. Currently we are left with only one option - being forced to sell for what we can get and walking away. Basically being left homeless.	-
Sarantos Economou	You have no idea how upsetting all this is for them and they don't need it at the age of 82. You are hurting the little ma and pa investors without any proper financial assistance.	-
Laura Newcombe	Being confronted with these costs and deadlines for strengthening has been incredibly overwhelming, and has caused me great anxiety.	-
Wellington Electricity	The PBSOP will compel third parties to expediently direct resources to remediating their priority buildings as appropriate and to ensure these buildings do not limit access through the city.	-
Tony Simpson	Many of those who reside in the building are owner occupiers, some of whom live on fixed incomes. Our leaseholders more generally are already in some cases struggling to meet the costs involved in bringing our building up to the required mark. If we are faced with the expense of doing so more rapidly than we have calculated then some of those who own flats in the building will be unable to meet their financial obligations in that regard.	-
Wellington Electricity	From a more general perspective WELL considers defining a set of clear criteria informing building owners as to potential exemption's (or partial exemptions) to the priority building notification process is appropriate. Similarly, reference to an explicit set of criteria should be provided where only URM remediation works could be undertaken	-
Inner City Wellington	More clarity is required on how buildings on emergency transport routes are identified as priority buildings and what evidence WCC must provide of the risk of the identified buildings collapsing onto the emergency routes.	Any building that is on an emergency transport route that is below 34% of the New Building Standard and has the potential to impede the route is a priority building and will require remediation within 7.5 years (unless they already have a prior (and earlier) deadline.
Inner City Wellington	ICW would like independent assurance that:	

	<ul style="list-style-type: none"> • buildings that have been previously assessed and deemed not earthquake prone are not being included again without further information being held by WCC • buildings (that are not earthquake-prone) and used to include streets as high traffic routes are URM. 	<p>If a building has been determined as not earthquake-prone, only if further information comes to light, will the buildings status come under review.</p> <p>Only buildings that are URM or have URM parts have been included in the proposed routes for high traffic.</p>
	<p>Is WCC going to identify all earthquake-prone buildings on these routes as priority buildings until owners provide evidence to the contrary? What evidence will WCC provide to justify the identification as a priority building?</p>	<p>Once high traffic and emergency transport routes have been set in the city, the Council will consider all unreinforced and earthquake prone buildings individually at some level of detail to determine if they were to collapse in an earthquake event, whether they would collapse onto the routes.</p>
<p>Historic Places wellington Inc.</p>	<p>Will you have a minimum set-back distance from the boundary that defines 'Priority' EPB elements? For example, if the building is set back from the thoroughfare/pavement by 5 or 10 metres, does this still require the same action?</p>	<p>It is likely that some buildings and parts of buildings will be sufficiently set back (1.5 times the height of the building) from the emergency or high traffic routes that any collapse would not impede emergency services or cause harm or death to the public using those routes</p> <p>In these cases, they would not be considered a priority building and the reduced</p>

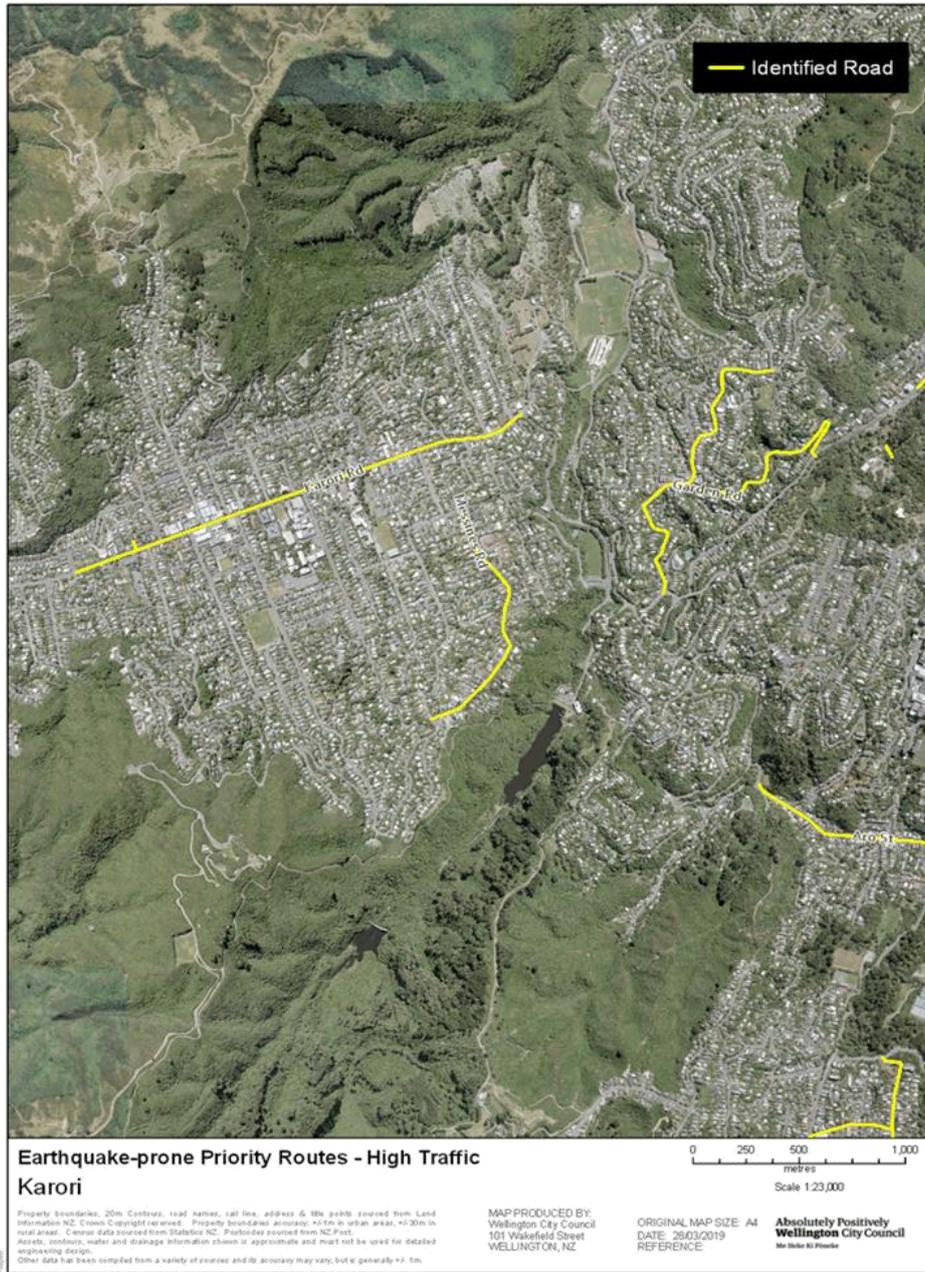
		timeframe for remediation would not apply.
Ash McCrone	We are not experts – but we are expected to find technical solutions, determine and navigate the legal and financial pathways to achieve those solutions, find ways to fund the work, and plan multi-million-dollar construction projects with potentially massive risks! The Government and Councils need to rethink the EPB policies and determine sound equitable solutions to support owners with the complexities and expense of seismic strengthening.	Council is establishing an advisory service to support the priority building programme of work.
Elin Lloyd	There needs to be a plan that acknowledges different socioeconomic tiers of need among those affected, and an assurance that keeping vulnerable people in their only homes will be a priority in the work plan around this.	-
Brooklyn Residents Assoc.	Having been in Brooklyn for the 2013 and 2016 earthquakes, a more likely risk to traffic flows would be hillsides collapsing. Such as happened in Ngaio Gorge in 2017 after heavy rain caused 3500 tonnes of rock and rubble to essentially cut that road off. The rock was potentially loosened / fragmented by previous earthquakes	The Council has included substantial additional funding to improve the resilience of Wellington in its 2018 28 long term plan. this includes additional funding to strengthen the roading corridor (including strengthening retaining walls above and below the roading corridor)
Matthew Wright	The situation of the property on the land needs to be taken into account. For example, if the property is down a driveway or set well back from the road, then there is no chance for the road to be affected by any damage from the falling building, then it should be specifically excluded. A blanket policy to cover all buildings on the street would not work. Only buildings which could potentially fall onto the road should be included.	Once high traffic and emergency transport routes have been set in the city, the Council will consider all unreinforced and earthquake prone buildings individually at some level of detail to determine if they were to collapse in an earthquake event, whether they would collapse onto the routes.
Richard Arlidge	At a distance of some 25 metres (downhill) from the nearest edge of the carriageway, there is no chance that this building poses a realistic risk to any significant transport route. Accordingly, I do trust that common sense in the application of any proposed new policy will prevail? Maybe a sensible exemption could be worded around exempting EPBs where the distance from the building to the centreline of the adjacent carriageway is greater than, say, three (or, if you must, four or five?) times the height of the structure or principal street front facade?	It is likely that some buildings

		<p>will be sufficiently set back (1.5 times the height of the building) from the emergency or high traffic routes that any collapse would not impede emergency services or cause harm or death to the public using those routes</p> <p>In these cases, they would not be considered a priority building and the reduced timeframe for remediation would not apply.</p>
Tasman Garden Body Corporate	As the priority EQP building list is to be based on the expected performance of buildings in a “moderate” earthquake, it would be helpful to understand what constitutes a “moderate” earthquake in terms of WCCs determination of the priority list.	<p>A moderate earthquake is defined in the Building Act under the regulations and captures the broadly understood 33% of the New Building Standard (NBS)</p> <p>‘Moderate earthquake and ultimate capacity defined. For the purposes of Section 133AB of the Act (meaning earthquake-prone building) moderate earthquake means, in relation to a building, an earthquake that would generate shaking at the site of the building that of the same duration as, but that is one-third as strong as, the earthquake shaking (determined by normal</p>

		measure of acceleration, velocity and displacement) that would be used to design a new building at that site if it were designed on 1 July 2017.
Esther King	Work on the busiest pedestrian ones fires eg Cuba St. Please also look at the verandas – many look very unsafe and likely to come down. This should be an easier quicker job.	Council has a Veranda Bylaw in place, whereby Council officers inspects all verandas on a five yearly basis, ensuring building owners are maintaining and upgrading their verandas on a regular basis.
Tomas Kriha	We should ensure safe routes for the public to evacuate (from CBD to home; from the city out) on bike or foot.	The purpose of the emergency routes used to identify priority buildings is to allow emergency services to access the city immediately after an event to move critical supplies to where they are needed and access key services eg. hospital. Additional routes would be opened on a gradual basis.
Carl Savage	Most likely risks in a major earthquakes are more likely to be landslips than building collapses.	-
Nick Pinfold	Many of the banks surrounding the roads will give way in a moderate earthquake. For example the top of Abel Smith Street and The Terrace is likely to experience rock fall blocking the road.	-

Attachment 2

High Traffic Routes

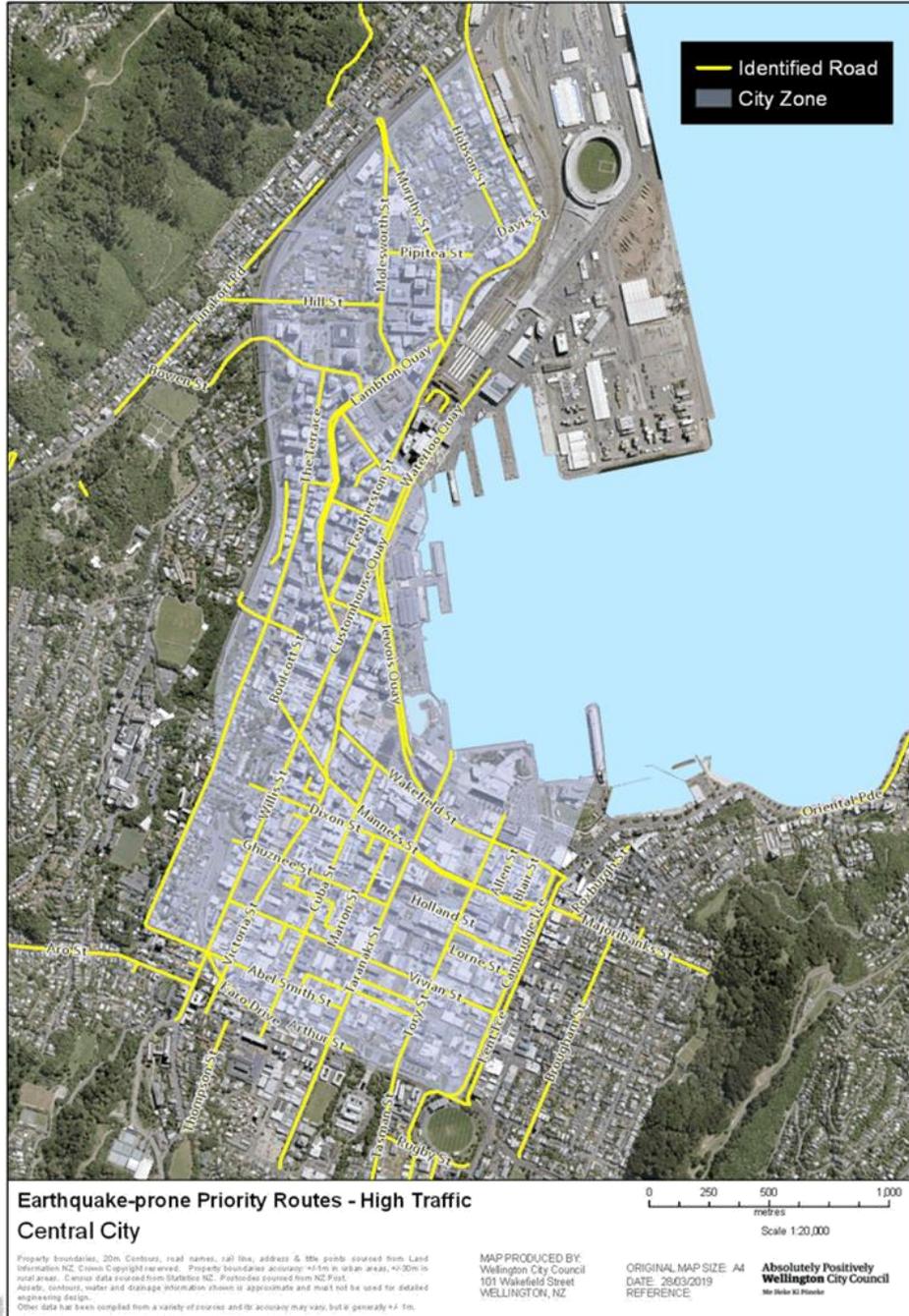






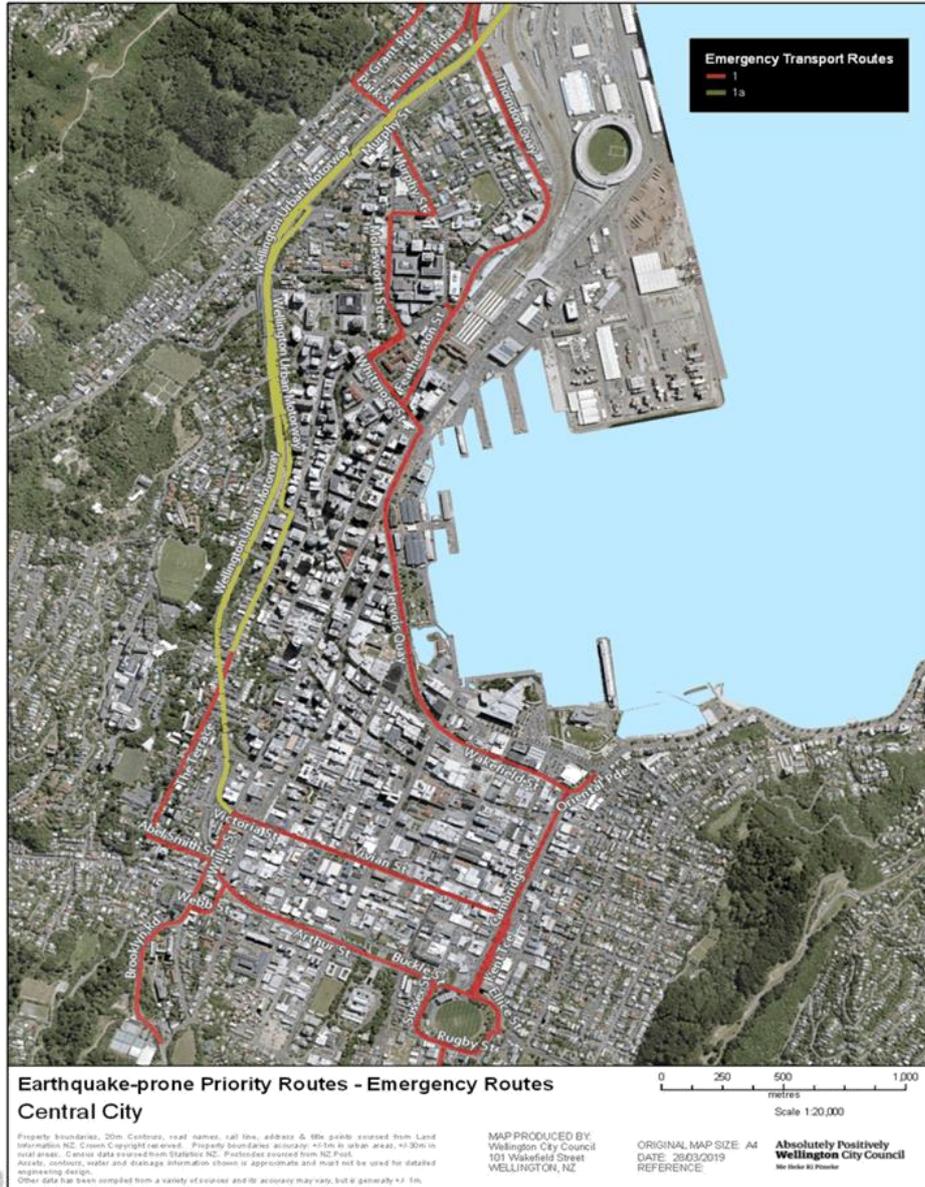




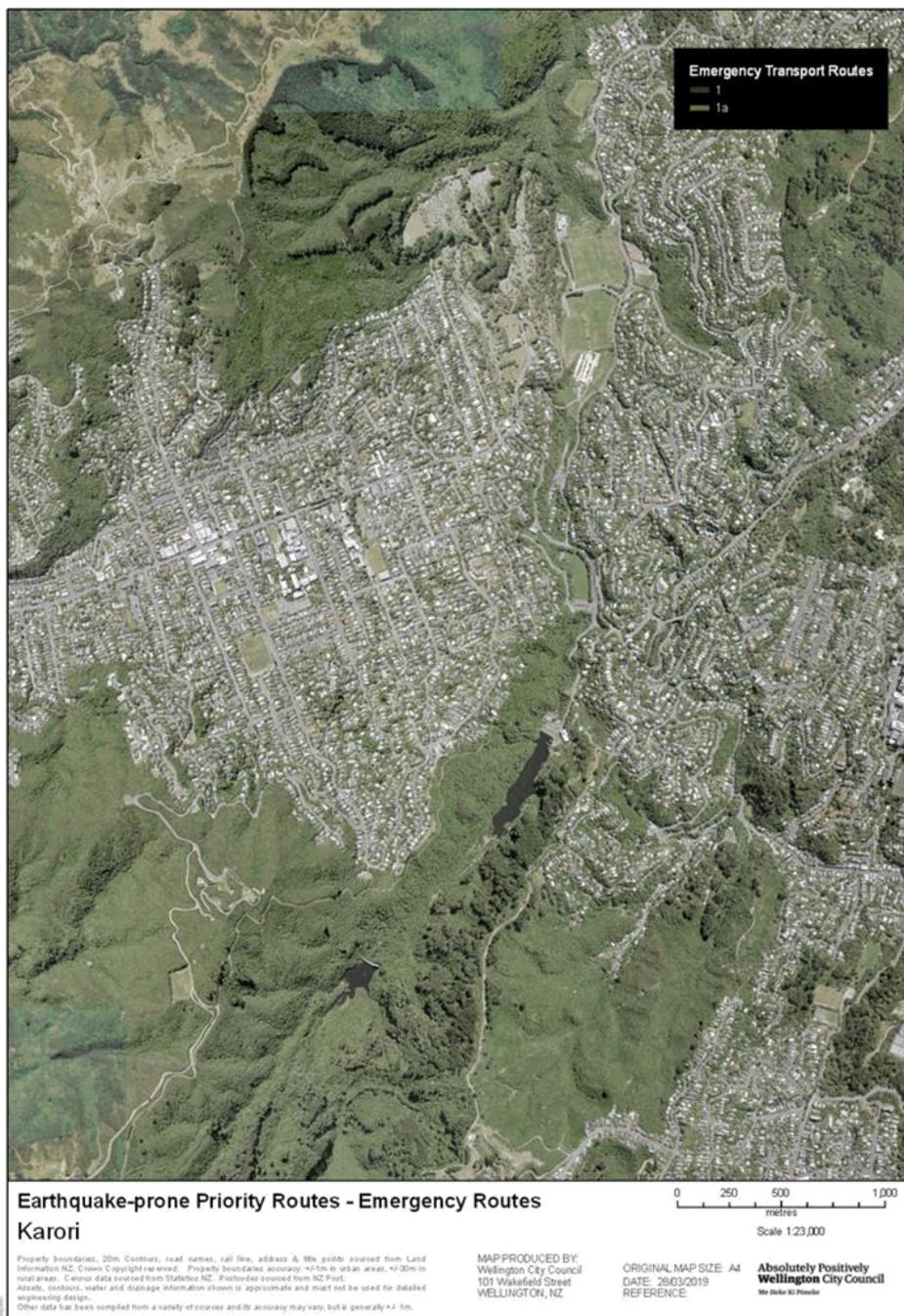


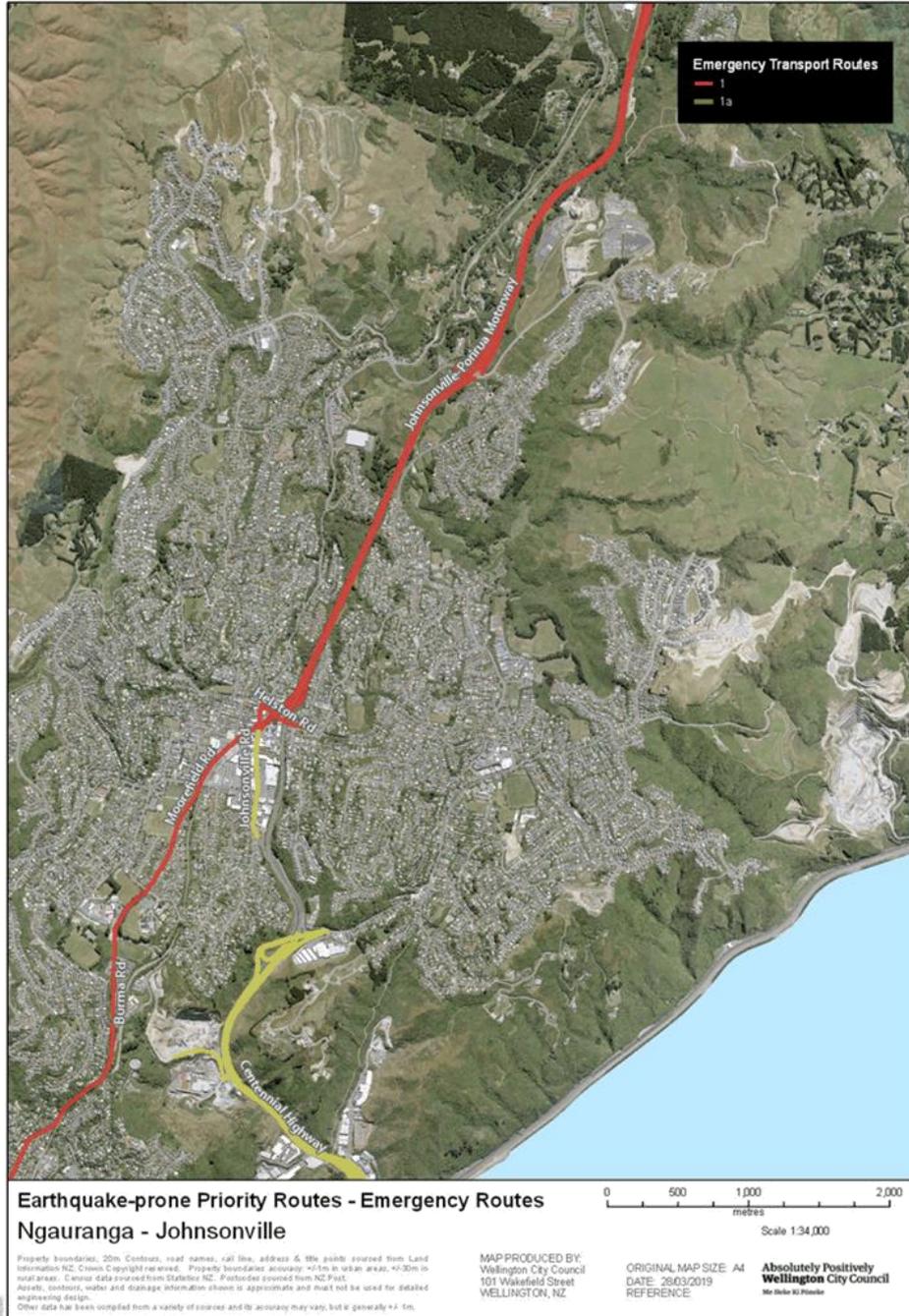


Emergency transport routes



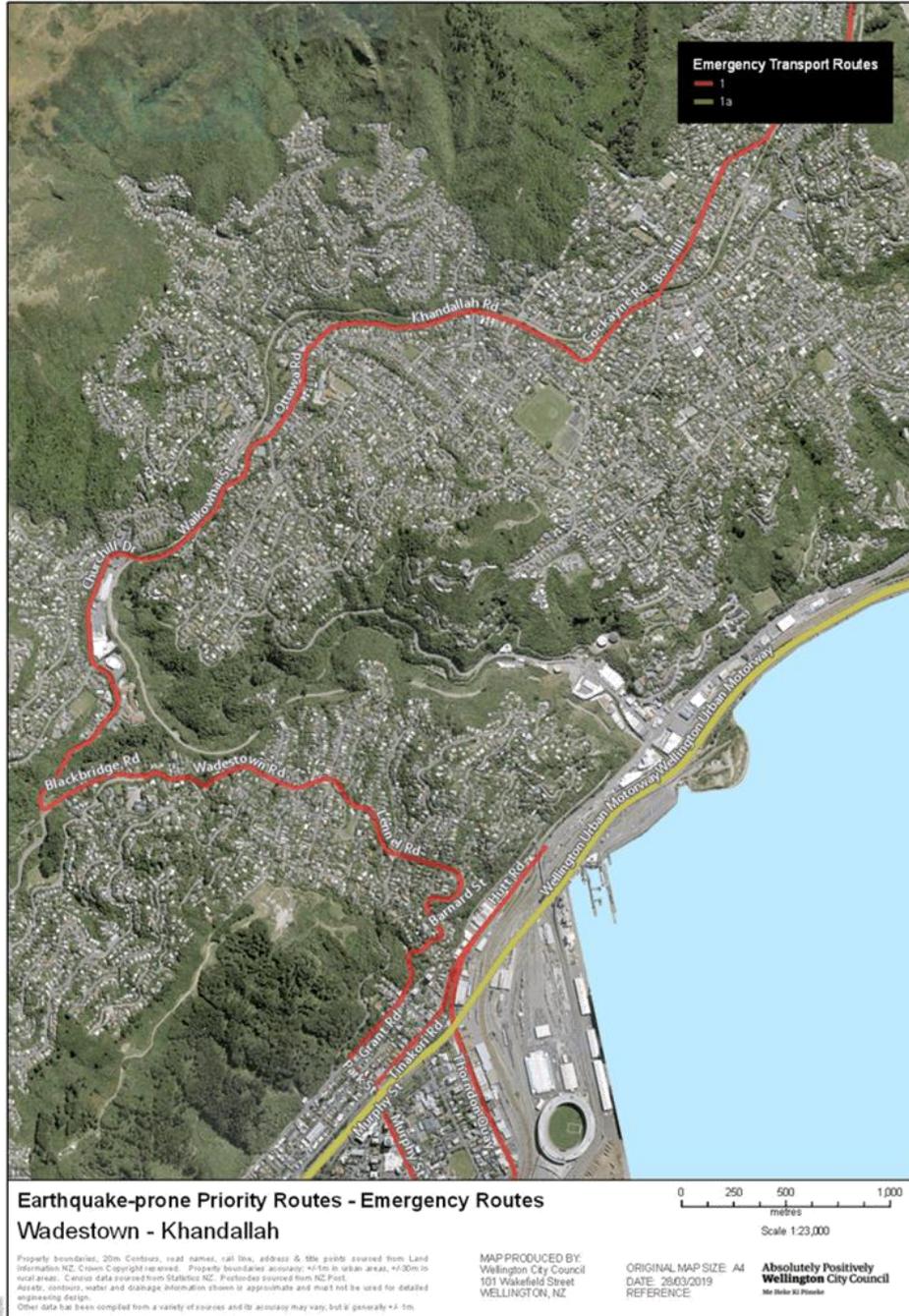












Attachment 3

High Traffic Routes

Suburb	Road Name
Aro Valley	Abel Smith St
Aro Valley	Aro St
Aro Valley	Boston Tce
Aro Valley	Palmer St
Aro Valley	Willis St
Berhampore	Adelaide Rd
Brooklyn	Cleveland St
Brooklyn	Todman St
Brooklyn	Washington Ave
Glenside	Middleton Rd
Hataitai	Evans Bay Pde
Hataitai	Hataitai Rd
Hataitai	Kilbirnie Cres
Hataitai	Moxham Ave
Hataitai	Waitoa Rd
Island Bay	Adelaide Rd
Island Bay	Brighton St
Island Bay	Derwent St
Island Bay	Humber St
Island Bay	Reef St
Island Bay	The Esplanade
Island Bay	The Parade
Johnsonville	Centennial Highway
Johnsonville	Johnsonville Rd
Kaiwharawhara	Hutt Rd
Kaiwharawhara	Kaiwharawhara Rd
Karori	Eagle St
Karori	Karori Rd
Karori	Messines Rd
Kelburn	Botanic Gardens
Kelburn	Boulcott St
Kelburn	Bowen St
Kelburn	Garden Rd
Kelburn	Tinakori Rd
Khandallah	Dekka St
Khandallah	Hutt Rd
Khandallah	Khandallah Rd
Kilbirnie	Bay Rd
Kilbirnie	Coutts St
Kilbirnie	Duncan Tce

Kilbirnie	Evans Bay Pde
Kilbirnie	Kemp St
Kilbirnie	Kilbirnie Cres
Kilbirnie	Moxham Ave
Kilbirnie	Onepu Rd
Kilbirnie	Rongotai Rd
Kilbirnie	Te Whiti St
Kilbirnie	Troy St
Lyll Bay	Apu Cres
Lyll Bay	Kingsford Smith St
Lyll Bay	Onepu Rd
Maupuia	Maupuia Rd
Miramar	Broadway
Miramar	Brussels St
Miramar	Caledonia St
Miramar	Hobart St
Miramar	Ira St
Miramar	Maupuia Rd
Miramar	Monorgan Rd
Miramar	Park Rd
Mount Cook	Adelaide Rd
Mount Cook	Belfast St
Mount Cook	Drummond St
Mount Cook	Hanson St
Mount Cook	Rugby St
Mount Cook	Sussex St
Mount Cook	Taranaki St
Mount Cook	Tasman St
Mount Cook	Thompson St
Mount Cook	Victoria St
Mount Cook	Willis St
Mount Victoria	Brougham St
Mount Victoria	Buckle St (SH1)
Mount Victoria	Cambridge Tce
Mount Victoria	Hawker St
Mount Victoria	Kent Tce
Mount Victoria	Majoribanks St
Mount Victoria	Roxburgh St
Mount Victoria	Vivian St
Newtown	Adelaide Rd
Newtown	Constable St
Newtown	Hanson St
Newtown	Mansfield St
Newtown	Mein St
Newtown	Owen St
Newtown	Rhodes St

Newtown	Riddiford St
Newtown	Rintoul St
Newtown	Zoo internal area
Ngaio	Abbott St
Ngaio	Crofton Rd
Ngaio	Kaiwharawhara Rd
Ngaio	Khandallah Rd
Northland	Garden Rd
Northland	Northland Rd
Oriental Bay	Kent Tce
Oriental Bay	Oriental Pde
Oriental Bay	Wakefield St
Pipitea	Bowen St
Pipitea	Bunny St
Pipitea	Customhouse Quay
Pipitea	Davis St
Pipitea	Featherston St
Pipitea	Hill St
Pipitea	Hobson St
Pipitea	Hutt Rd
Pipitea	Lambton Quay
Pipitea	Molesworth St
Pipitea	Mulgrave St
Pipitea	Sar St
Pipitea	The Terrace
Pipitea	Thorndon Quay
Pipitea	Waterloo Quay
Rongotai	Coutts St
Rongotai	Kingsford Smith St
Rongotai	Mamari St
Rongotai	Rongotai Rd
Rongotai	Tirangi Rd
Roseneath	Evans Bay Pde
Roseneath	Grafton Rd
Roseneath	Oriental Pde
Strathmore Park	Broadway
Strathmore Park	Monorgan Rd
Tawa	Collins Ave
Tawa	Main Rd
Tawa	Victory Cres
Te Aro	Abel Smith St
Te Aro	Allen St
Te Aro	Aro St
Te Aro	Arthur St
Te Aro	Blair St
Te Aro	Boulcott St

Te Aro	Buckle St (SH1)
Te Aro	Cambridge Tce
Te Aro	Claytons Ave
Te Aro	Courtenay Pl
Te Aro	Cuba St
Te Aro	Dixon St
Te Aro	Edward St
Te Aro	Egmont St
Te Aro	Eva St
Te Aro	Feltex Lane
Te Aro	Frederick St
Te Aro	Garrett St
Te Aro	Ghuznee St
Te Aro	Haining St
Te Aro	Holland St
Te Aro	Karo Drive
Te Aro	Lorne St
Te Aro	Lukes Lane
Te Aro	Manners St
Te Aro	Marion St
Te Aro	Palmer St
Te Aro	Swan Lane
Te Aro	Taranaki St
Te Aro	Tasman St
Te Aro	Tennyson St
Te Aro	The Terrace
Te Aro	Tory St
Te Aro	Victoria St
Te Aro	Vivian St
Te Aro	Wakefield St
Te Aro	Wigan St
Te Aro	Willis St
Thorndon	Bowen St
Thorndon	Davis St
Thorndon	Hill St
Thorndon	Hobson St
Thorndon	Molesworth St
Thorndon	Mulgrave St
Thorndon	Murphy St
Thorndon	Pipitea St
Thorndon	Tinakori Rd
Thorndon	Wadestown Rd
Wadestown	Wadestown Rd
Wellington Central	Ballance St
Wellington Central	Boulcott St
Wellington Central	Bowen St

Wellington Central	Cuba St
Wellington Central	Customhouse Quay
Wellington Central	Featherston St
Wellington Central	Hunter St
Wellington Central	Jervois Quay
Wellington Central	Johnston St
Wellington Central	Lambton Quay
Wellington Central	Maginnity St
Wellington Central	Rosina Fell Lane
Wellington Central	Taranaki St
Wellington Central	The Terrace
Wellington Central	Victoria St
Wellington Central	Wakefield St
Wellington Central	Willis St
Wellington Central	Woodward St

Emergency Transport Routes

Suburb	Road Name
Aro Valley	Abel Smith St
Aro Valley	Brooklyn Rd
Aro Valley	Willis St
Berhampore	Rintoul St
Brooklyn	Brooklyn Rd
Churton Park	Johnsonville-Porirua Motorway
Crofton Downs	Churchill Dr
Glenside	Johnsonville-Porirua Motorway
Grenada North	Johnsonville-Porirua Motorway
Grenada North	Takapu Road
Grenada Village	Johnsonville-Porirua Motorway
Hataitai	Crawford Rd
Johnsonville	Burma Rd
Johnsonville	Centennial Highway
Johnsonville	Helston Rd
Johnsonville	Johnsonville-Porirua Motorway
Johnsonville	Johnsonville Rd
Johnsonville	Moorefield Rd
Kaiwharawhara	Wellington Urban Motorway
Khandallah	Box Hill
Khandallah	Burma Rd
Khandallah	Cockayne Rd
Khandallah	Khandallah Rd
Khandallah	Wellington Urban Motorway
Kilbirnie	Coutts St

Kilbirnie	Evans Bay Pde
Kilbirnie	Kilbirnie Cres
Kilbirnie	Rongotai Rd
Kilbirnie	Salek St
Kilbirnie	Wellington Rd
Mount Cook	Adelaide Rd
Mount Cook	Buckle St
Mount Cook	Dufferin St
Mount Cook	Ellice St
Mount Cook	Rugby St
Mount Cook	Sussex St
Mount Victoria	Cambridge Tce
Mount Victoria	Kent Tce
Newlands	Centennial Highway
Newtown	Constable St
Newtown	Riddiford St
Newtown	Rintoul St
Ngaio	Khandallah Rd
Ngaio	Ottawa Rd
Ngaio	Waikowhai St
Ngauranga	Centennial Highway
Ngauranga	Kiwi Point Quarry Rd
Ngauranga	Wellington Urban Motorway
Oriental Bay	Oriental Pde
Paparangi	Johnsonville-Porirua Motorway
Pipitea	Featherston St
Pipitea	Hutt Rd
Pipitea	Lambton Quay
Pipitea	Molesworth Street
Pipitea	Mulgrave St
Pipitea	Thorndon Quay
Pipitea	Wellington Urban Motorway
Pipitea	Whitmore St
Rongotai	Coutts St
Rongotai	Tirangi Rd
Takapu Valley	Johnsonville-Porirua Motorway
Tawa	Johnsonville-Porirua Motorway
Tawa	Takapu Rd
Te Aro	Arthur St
Te Aro	Buckle St
Te Aro	Karo Drive
Te Aro	The Terrace
Te Aro	Victoria St
Te Aro	Vivian St
Te Aro	Wakefield St
Te Aro	Webb St

Te Aro	Wellington Urban Motorway
Te Aro	Willis St
Thorndon	Grant Rd
Thorndon	Hawkestone St
Thorndon	Little Pipitea St
Thorndon	Molesworth Street
Thorndon	Murphy St
Thorndon	Park St
Thorndon	Tinakori Rd
Thorndon	Wellington Urban Motorway
Wadestown	Barnard St
Wadestown	Blackbridge Rd
Wadestown	Grosvenor Tce
Wadestown	Lennel Rd
Wadestown	Wadestown Rd
Wellington Central	Customhouse Quay
Wellington Central	Jervois Quay
Wellington Central	The Terrace
Wellington Central	Wellington Urban Motorway