

Trading and Events in Public Places Policy Submission To Wellington City Council

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We would like to appear in person to support our submission

Contact person:

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Wellington City Youth Council
Te Rūnanga Taiohi o te Kaunihera o Pōneke

Introduction

1. The Wellington City Youth Council (Youth Council) welcomes the opportunity to submit on the Trading and Events in Public Places policy for Wellington City.
2. We support the focus on balancing commercial use with the need to ensure that public spaces remain being primarily for public use and enjoyment.
3. By allowing Council to have full oversight over commercial activities in public places, we believe that this will allow a positive balance to be struck between businesses and the general public.
4. Further to the objectives and direction of the proposal, Youth Council would support a stronger focus on the environmental impact of commercial activities and events approved by Council. In order to ensure that our natural environment is respected and maintained, commercial activities and events should be required to provide a thorough plan as to how their operation will take steps to reduce its impact on the natural environment which it is operating in.
5. Finally, we believe that cultural considerations need to be at the forefront of the approval process. Whilst considerations of the urban, heritage and natural environment remain of high priority, consideration needs to be taken as to whether allowing the operation of commercial activities or events would have negative impacts based on the proximity to cultural sites or environments.

Objectives

6. Youth Council believes that trading and events in public places should encourage vibrancy, diversity, and amenity as a core focus.
7. However, alongside these core focuses, we would suggest that the term “liveability” be used to centre the policy. This term is easier to understand in a practical sense by the average Wellingtonian who approaches this policy, and widely encompasses the intention of the other core focuses.
8. Maintaining appropriate standards of public health, safety, and accessibility are very important, alongside promoting consistent and predictable access ways on footpaths.
9. Minimising disruptions to pedestrians is important and inevitable disruption should be managed in a balanced way to ensure a vibrant and accessible space for all.
10. Protecting the urban and natural environment is important, especially with managing waste. However, heritage should not have such extreme priority that events are not permitted nearby a heritage site, unless there are cultural considerations.

11. Therefore to improve and expand on the objective of protecting the urban, heritage and natural environment, Youth Council would suggest adding the cultural environment as a consideration to be protected. In some circumstances, there may be heritage sites that are not meaningfully impacted or undermined by having an event nearby. However, there may be places of cultural significance where nearby events and activities could be inappropriate. Therefore, cultural considerations should be added to this objective.
12. Furthermore, whilst it is necessary to minimise the impact on property and existing businesses that these events and activities may have, this concern must be balanced with allowing pop-ups and events to exist, as an impact on property and businesses to an extent is inevitable.
13. Youth Council supports ensuring that costs are recovered from commercial activity on public land.
14. It is important that these regulations are clear and accessible to maximise buy-in and understanding.

Scope

15. Youth Council supports the proposed scope of the Trading and Events in Public Places policy, agreeing that all applicable trading's and events have been covered in the policy.
16. Youth Council agrees with the proposal that commercial events or activities taking place in public places should require prior approval for operation. This would ensure that events and activities have conditions and boundaries to operation to ensure that public health and safety is acknowledged and managed.
17. In addition to the general requirements of applications for approval, Youth Council would support a push to require all applications to include a waste management and minimisation plan for the event/activity. By requiring this plan, organisers will be forced to consider the effect that their event may have on the environment through waste production, ensuring that events in our public spaces do not have negative effects on the environment .
18. In particular, thorough, detailed waste management and minimisation plans need to be a requirement for operating in reserve and town belt areas. The submitted plans should need to establish that there will be no negative environmental effects on these areas to protect the cleanliness of the space and environment more generally.
19. Requiring approval for reasonably-sized events and activities will also ensure that the occupation of public places is managed and balanced. Public places should be accessible for all Wellingtonians for the majority of time. By managing events in public

places through a booking-type system, this will ensure that there isn't an excessive number of events being held in a public place, potentially leading to the general public being limited in their access to the spaces.

Accessibility

20. Youth Council notes the importance of having an accessible city for all in pedestrian areas and public spaces.
21. Youth Council supports Council's balanced approach to ensuring that public spaces are both inclusive and accessible.
22. It has been recommended that the consistent, unobstructed through-zone is located next to the building line as it is an orientation cue for low-vision or blind people. Youth Council supports this approach.
23. The recommendation in this policy that activity occur near the kerb is a good suggestion for the through-zone, but will have to be managed with care to ensure that people follow the new protocol. Buskers, retail stands, and outdoor dining will now be more exposed to weather, which might be difficult to manage as people gravitate towards the building line. Youth Council notes that this might not be an easy shift for people to make, and might lead to more obstructions on all sides of walkways if not managed properly and clearly communicated by Council.
24. Youth Council supports the use of barriers and markers to direct people in areas where it is difficult to move activities or set-ups to the kerb. Providing incentives such as recommended places where shelter can be found near the kerb could be a way to manage this.

Proposed reserve and Wellington Town Belt sites

25. Youth Council supports the proposed sites and activities listed as part of the proposed reserve and Town Belt areas.
26. We believe that it is important that these sites are only used in a temporary manner, such that they do not affect the permanent area they exist within.
27. As such, the use of the sites should be minimally invasive . Where commercial activities are operating in the reserve and Town Belt areas, there needs to be a focus on these activities working alongside the natural environment, rather than in juxtaposition to the space.
28. Commercial activities within the reserve and Town Belt sites should not impose on the atmosphere of the site, particularly when the space would otherwise be peaceful and quiet.

29. The Town Belt and reserve sites are often used by Wellingtonians to connect with nature and escape the hustle and bustle of the city – the introduction of commercial activities in this space should aim to not impact this.

Supporting Trade in Public Spaces

30. Youth Council believes that increasing no-car zones or incentivising against the use of vehicles would be an effective way to promote spaces where markets and buskers can perform or take place. This has been seen as being effective through closing spaces such as lower Cuba street for the operation of night markets, allowing the community to come together and support creative enterprises in a safe, vehicle-free space.
31. Furthermore, Council could play a part in increasing accessibility for first-time business starters or youth engaging in business activities (such as the Young Enterprise Scheme) by reducing or supporting fees associated with start-ups. For example, a registration fee associated with using Council-owned public places can be a barrier for young people beginning in a business – waiving or reducing this fee for particular groups would allow Council to support and grow such creative enterprises.
32. Overall, Youth Council supports the increase in mobile trading sites in the city. However, we would caution against adding too many new sites as an excessive number of food trucks in public places may begin to feel like a nuisance to the community and their ability to enjoy the spaces.

Smokefree and Vapefree Public Places

33. The WCYC strongly agrees with keeping public spaces smoke and vape free.
34. Requiring events and activities in public places is an important step to allow us to stick to the Smokefree Wellington Action Plan 2019. Reducing the public places where people can smoke/vape reduces the harms of second and third hand smoke as well as ensuring we're setting a good example for youth in the city. Long term, this also works towards New Zealand's goal of being a smokefree country by 2025.

Charity Collectors and Face-to-face Fundraisers

35. Youth Council supports the proposed changes to increase the visibility of information such as timetabling and complaints processes to the public.
36. This increase in visibility needs to occur by having all information regarding face-to-face fundraisers and charity collectors in one place, going beyond the current suggestion of publicising collection locations and times, as well as the complaints process.

37. By compiling all information regarding fundraisers and charity collectors in one place on the Council website, this will allow the general public to easily gain a holistic understanding of the processes associated with such approvals.
38. Information collated in this space could include outlining where these fundraisers and charity collectors are situated in the city; what they do; how the WCC works alongside Public Fundraising Regulatory Association (PFRA); policies from the WCC and PFRA in which these fundraisers and charity collectors are compliant under; and a complaints form (online and pdf) to help maintain conflict with pedestrian and retail activity.
39. Where the general public is able to access all information regarding fundraisers and charity collectors in one space, this will minimise confuse and frustrations as the public are able to easily be aware of this information prior to the fundraising occurring. Furthermore, concerns about the legitimacy or issues associated with pedestrian and retail effects of fundraisers may be pre-empted where individuals can see the approval process required by such charities to operate.
40. Youth Council would like to see more clarity on the permit process required for face-to-face fundraisers and charity collectors in the Policy. Currently, it is unclear whether face-to-face fundraisers and charity collectors are required to gain a permit to operate, or whether this is covered by the PFRA. If a permit is required, more information is needed to establish what this process would look like and whether it is applicable to all fundraising and charitable businesses.
41. Youth Council would also suggest that a new business model may be created to facilitate the ability of fundraisers to approach the general public to regulate and maintain conflict between the fundraisers and pedestrians. Such a business model could be ongoing in the hope of addressing concerns and issues before they arise.

Conclusion

42. In summary, Youth Council supports the Trading and Events in Public Places Policy.
43. We believe that the move to integrate the existing Footpath Management Policy and Trading in Public Places Policy will allow easier access for Wellingtonians as they seek to navigate the requirements of operation in these spaces.
44. Transparency and ease of access will be crucial in supporting Wellingtonians to understand and comply with this policy. As has been outlined through our consideration of the proposed changes with charity and fundraising events, it is important to collate all information that an individual needs in one space. This information needs to be easy to navigate and understand in order to enable Wellingtonians to benefit from the new integrated policy.

45. Finally, Youth Council wishes to reiterate its concerns regarding environmental impacts and cultural considerations with events and activities approved by Council. It is important that all events/activities approved include a thorough waste management and minimisation plan which is up to standard, rather than this only being regarded as a suggested supporting document. Furthermore, cultural considerations need to be made when approving events in public places, such as whether the nature of the event is culturally inappropriate or may be located near spaces of cultural significance.
46. Youth Council hopes that through the implementation of this strategy, our public places will be able to continue being lively, active and safe spaces for Wellingtonians, whilst also striking the balance of being able to support commercial enterprises in these areas.