

EARTHQUAKE-PRONE BUILDINGS

Written submissions received

30 November 2018

Wellington City Council

Earthquake-Prone Buildings

Written submissions received

Notice of information withheld under Local Government Official Information and Meetings Act 1987

Some information supplied by submitters has been withheld in accordance with provisions in the Local Government Official Information and Meetings Act 1987 (LGOIMA) as follows:

- Contact information of submitters has been withheld in order to protect the privacy of natural persons, including that of deceased natural persons [LGOIMA s7(2)(a)]; and

Due to removal of duplicate submissions, not all submission numbers have been used.

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Submitter Details

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 Last Name: **Bromley**
 Street: [REDACTED] **Wilton**
 Suburb: **Wellington**
 City: **Wellington**
 Country: **New Zealand**
 PostCode: **6012**
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both
-

Submission

Questions about Earthquake-Prone Buildings

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

Wellington is a densely populated city and a lot of people walk around town

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

They seem to be concise

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

No I think you have done well to capture the priority routes

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

Remove the need to upgrade fire and disabled access while strengthening a priority building. Providing a step by step guide for building owners to help them understand the process of assessing and retrofitting Earthquake Prone Buildings.

Is there anything else we need to take into account in setting these routes?

Comments

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Jacob**

Last Name: **Doherty**

Street: [REDACTED]

Suburb: **Te Aro**

City: **Wellington**

Country: **New Zealand**

PostCode: **6011**

Daytime Phone: [REDACTED]

eMail: [REDACTED]

Wishes to be heard:

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

Submitter

Agent

Both

Submission

Questions about Earthquake-Prone Buildings

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

Yes

No

Why?

Thank you for the opportunity to provide feedback on the statement of proposal. I would respectfully request that the project team 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. Typically late morning through to late afternoon on a Saturday and Sunday results in the highest concentrations of both pedestrians and vehicles. In my opinion these volumes would be similar to other streets listed as High Traffic Routes.

Do you agree with the proposed emergency transport routes?

Yes

No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

Is there anything else we need to take into account in setting these routes?

Comments

Attached Documents

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| Earthquake-Prone Priority Buildings |

Earthquake-Prone Priority Buildings

Identifying high traffic routes and emergency transport routes

Absolutely Positively
Wellington City Council

Me Heke Ki Pōneke

We want to hear your views on earthquake-prone priority buildings. You can answer these questions online at www.wcc.govt.nz/have-your-say/consultations, email your thoughts to policy.submissions@wcc.govt.nz or post this form to us (no stamp needed). Tell us what you think by 5pm Friday 23 November.

Privacy statement - what we do with your personal information

All submissions are provided to elected members. Submissions (including names but not contact details) will be made available to the public at our office and on our website. Your personal information will also be used for the administration of the consultation process, including informing you of the outcome of the consultation. All information collected will be held by Wellington City Council, 101 Wakefield Street, Wellington, with submitters having the right to access and correct personal information.

Section 1 - your details

| | |
|---|---|
| Your name*: | CHRISTOPHER BUTLER |
| Your email or postal address*: | [REDACTED] |
| You are making this submission | |
| <input type="checkbox"/> as an individual | |
| <input checked="" type="checkbox"/> on behalf of an organisation. Your organisation's name* | BOND STORE BODY CORPORATE 76757 |
| I would like to make an oral submission to the Councillors | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| If yes, please give your phone number so that a submission time can be arranged*: | [REDACTED] |

*mandatory field

Section 2 - questions about Earthquake-Prone Priority Buildings

Identifying high traffic routes and emergency transport routes

| | |
|--|--|
| 1. Do you agree with the proposed high traffic routes? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Why? | EGMONT STREET, TE ARO, SHOULD NOT BE CLASSIFIED AS A HIGH TRAFFIC ROUTE. IT IS A PRIVATELY OWNED LANEWAY WITH LIMITED PEDESTRIAN TRAFFIC AND VEHICULAR TRAFFIC COMPOSED OF RESIDENTS' CARS AND SERVICE VEHICLES, PLUS ^{SOME} VEHICLES USING THE LANEWAY AS A SHORT CUT BETWEEN DIXON ST AND GHAUZNEE ST. WE ARE EXPLORING WAYS TO ELIMINATE THE LAST CATEGORY (EG RETRACTABLE BOLLARD/S). |

2. Do you agree with the proposed emergency transport routes?

Yes No

Why?

NO COMMENT

3. Do you think we have been over-inclusive in some areas, or left out areas which should be included?

BLANKET CATEGORISATION RESULTS IN ANOMALIES BEING OVERLOOKED, AND/OR CREATED. EGMONT STREET, FOR EXAMPLE, IS NOT A PUBLIC THOROUGHFARE. ARE THERE IMPLICATIONS IN ACCEPTING A DE FACTO WCC DEFINITION ~~AS~~ NOT ONLY AS A PUBLIC THOROUGHFARE BUT ALSO A HIGH TRAFFIC ONE?

4. How can the Council best support building owners meet requirements for remediating their buildings?

- PROVISION OF AND/OR SUPPORT FOR FINANCIAL INSTRUMENTS SUCH TARGETED RATES, LENDER OF LAST RESORT, GRANTS, SUSPENSORY LOANS, ~~E~~ TAX REBATES ETC WHICH REFLECT "PUBLIC GOOD" OUTCOMES
- EXPERT AND WELL RESOURCED ADVISORY SERVICES

5. Is there anything else we need to take into account in setting these routes?

NO COMMENT

10 November 2018

██████████
Wellington 6021

Chairperson
C S C and P L, I and S
Wellington City Council
PO Box 2199
Wellington 6140

Dear Iona Pannett

Submission on earthquake prone priority buildings 19 October – 23 November 2018

Tony Simpson, Chair of the Blythswood Owners’ Committee, and I met with you some years ago. You were sympathetic to our concerns. We are both retired and we each own one property only, our flats in Blythswood, 3 Aro Street, in which we live. My submission is in respect of myself and others in the same position.

Background:

Personal: My job was made surplus in 2011, when I was 66. Though disappointed, I was not too troubled by this event as by good luck and good management, I had paid off my flat at Blythswood - purchased in the 1980s - and intended to live there for the rest of my life. I had modest savings – I have only ever had an income slightly above the average – but with care and the odd part-time job, I was confident of a secure retirement.

General: 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. More people are harmed and killed by road accidents every year than were harmed and killed by any or all the recorded earthquakes in New Zealand. Nevertheless, perhaps in an attempt to be seen to be righteously acting, the government of the day decided that numerous buildings in New Zealand must be strengthened. Unfortunately, Blythswood was one such.

Action by Blythswood Committee Regarding Quake-Strengthening Requirements:

Starting in 2012, the Committee set a new earthquake levy for the owners of the building. We each had to find an extra \$6000 per annum. Two years later, the levy was reduced to \$4000 each per annum. This was not easy for those on a pension. Nevertheless, we have built up a considerable amount, more than half a million dollars. This amount has been drawn upon for the various experts (one hopes) who have done preparatory work on our building. It was understood each owner would need to pay an extra lump sum when the actual work commenced. The cost of the earthquake strengthening was originally estimated to be between one and two million dollars. A recent estimate has put the cost at between three and four million dollars.

There is a proposal to be put to our forthcoming annual meeting that the earthquake levy be raised again, possibly to an amount over \$6000 per annum for each owner.

Some General Concerns:

- Blythswood 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.
- Earthquake strengthening engineering does not seem to be an exact science. A report recently had various firms offering various degrees of quake-strength to the same building.
- Furthermore, certain new builds in Wellington suffered so much damage in the 2016 quake that they had/have to be demolished. Presumably they were built to code.
- Blythswood has withstood every quake thrown at it since the late 1920s, when it was erected.
- The amounts of money being demanded by the state of ordinary citizens are extortionate. I can think of no other instance where individuals, of relatively modest means, who take a pride in being largely independent, who have provided – as they are frequently urged to do – for their old age, are being pressured in this way.

Conclusion:

I have recently received a modest inheritance. Without that, I would not have been able to finance my share of the earthquake strengthening requirements for this building. In fact, due to the escalating estimates of the cost, I am wondering whether I will have enough even with that. From where does the government – local or central – think the average citizen can conjure up \$30,000 or \$50,000 or \$100,000 or more? Especially when those citizens are in their sixties, seventies and over?

Many of us are prepared to take our chances in this building. We sleep well at night and are no more fearful of it crashing down than when we moved in, when it met the then current building code. We are also aware that no matter how much money is eventually spent, a severe enough shake would bring it down anyway. On the other hand, no such earthquake may materialise. We accept our private safety as our responsibility.

If the powers-that-be are exercised by Blythswood’s proximity to, ‘**a) high traffic routes in the city and b) emergency transport routes in the city**’, then that brings in the issue of public health and safety. This should mean that almost every private dwelling place be required to strengthen. I realise that this would be so politically unpopular that it is unlikely to be demanded. Surely though justice demands that the public helps to pay for its own safety. It is grossly unfair that an individual has to shoulder such a public burden. Has such a demand ever occurred in this country before?

This submission is a request for public assistance with quake-strengthening, and a longer period for meeting the requirement to strengthen, especially for retirees who have one property only, in which they live.

Thank you for the opportunity to submit. I would like to make a short oral submission.

Faithfully

Carol Brown

██████████
████████████████████

copy: Prime Minister

20 November 2018



Priority Buildings
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WELLINGTON

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IISC is a service provider to We*

Transmittal via e-mail to: policy.submission@wcc.govt.nz

Submission on High Traffic Routes and Emergency Transport Routes

Wellington Electricity Lines Limited ('WELL') welcome the opportunity to provide feedback on Wellington City Council's consultation document '*Earthquake-Prone Priority Buildings: Identifying High Traffic Routes and Emergency Transport Routes: Statement of Proposal – October 2018*' ('PBSOP').

The Civil Defence and Emergency Management (CDEM) Act 2002 stipulates the responsibilities and roles of key organisations that provide an essential service within New Zealand. WELL's core business is electricity distribution, and hence is an essential service under the CDEM Act; consequently, WELL is statutorily classified as a Lifeline Utility.

WELL's responsibilities in an emergency situation are outlined by the CDEM Act (i.e., planning requirements so that a coordinated effort can be made to improve the resilience of lifeline utility infrastructure). Therefore, as part of our asset planning process, we identify network vulnerabilities and engage with other lifeline utility operators over shared learnings (such as the PBSOP).

WELL are aware that a number of coordinated studies have shown that transportation corridors into and throughout the region could be severely restricted after a major earthquake (i.e., URM debris blocking the road). Such restrictions represent significant complications that could delay restoration of critical lifeline infrastructure - such as electricity supply - for months post the emergency event.

The ability to keep people safe (initially), and to open emergency traffic routes following a significant seismic event is a critical matter for WELL.

WELL strongly support the High Traffic and Emergency Transport Route initiative which will assist in securing critical transportation corridor functionality. We have a number of earthquake risk and prone buildings ourselves and have a current programme (*Earthquake-Readiness Programme*) to upgrade the EPB's seismic resilience based on a risk matrix. This programme similarly includes the location of the building and whether it is near a critical and or highly populated area.

WELL acknowledge that we are only as strong as our weakest link; hence, we support Council's move to protect the integrity of critical transportation corridors within the region by ensuring buildings near these routes are resilient to a significant seismic event.

Consultation Question - Do you agree with the proposed high traffic routes? Why?

WELL has reviewed the PBSOP, and supporting documents, and agree in principle with the criteria used to define '*High Traffic Routes*' (i.e., vehicle and pedestrian routes with elevated public use and/or generation - as defined by MBIE).

WELL appreciate that Council (as the local road controlling authority) has undertaken robust transportation surveys to identify routes within the city to accurately map and define high traffic routes.

Of the 146 sections of transportation corridors identified in the PBSOP – WELL own and operate electricity distribution infrastructure (namely substations) located within buildings across the wider Wellington Region

As a Lifeline Utility, WELL acknowledge the importance of maintaining assets so as to effectively withstand natural hazard events. Council’s identification of High Traffic Routes provides well defined focus areas which will help inform WELL’s Earthquake-Readiness Programme in coordination with wider public consultation of the PBSOP.

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.

Consultation Question - Do you agree with the proposed emergency transport routes? Why?

WELL strongly supports the proposed Emergency Transport Routes in that the ability to re-open key transportation corridors to unrestricted movement throughout the city will improve responsiveness, and significantly reduce electricity restoration delays enabling the city to recover more quickly after an event (note: any delay in restoration time will have a significant impact on the city and wider Wellington Region emergency response).

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.

WELL’s support for the Emergency Transport Routes is primarily derived from the ability to access key electricity supply facilities immediately post an emergency event.

As a consequence of the routes being identified in the PBSOP, WELL will be better placed to restore supply to other key lifeline utilities (i.e., hospitals, and emergency services). Furthermore, 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.

Consultation Question - Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Overall the emergency traffic routes are balanced and are considered to provide reasonable access to most of WELL’s critical sites.

Consultation Question - Is there anything else we need to take into account in setting these routes?

From an organisational perspective WELL consider that the PBSOP addresses the key high-level matters relating to earthquake prone buildings and mitigating the adverse effects on transportation corridors.

Matters that could be expanded upon within the document relate to better definition of building elements (i.e., non-URM elements) that do not present elevated risk to emergency traffic routes. For example, it is understandable that buildings within or in close proximity to transportation routes, with URM elements, present a heightened hazard risk to impeding traffic; however, in the numerous cases where buildings are set back from such roads, the risk intended to be mitigated by the PBSOP may not be as high as say multi-level buildings directly abutting the road boundary.

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.).

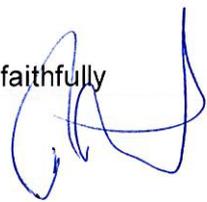
Consultation Question - How can the Council best support building owners meet requirements for remediating their buildings?

Council could further support priority building owners by providing clear guidance on partial remediation of notified buildings (as indicated above). It is assumed that the PBSOP implementation documents will provide such criteria – however the PBSOP itself could further elaborate on the building owner’s remediation requirements. Such criteria should also be provided for Emergency Corridors – particularly where the PBSOP currently requires the “whole building” to be remediated as opposed to just URM elements.

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.

Should you have any further questions, please do not hesitate to contact me directly at [REDACTED]

Yours faithfully



Ray Hardy
**GENERAL MANAGER ASSET MANAGEMENT
WELLINGTON ELECTRICITY LINES LIMITED**



22 November 2018

Priority Buildings 259/1001
Freepost 2199
Wellington City Council
PO Box 2199 
Wellington

By email: policy.submission@wcc.govt.nz

Dear Sir or Madam

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON THE STATEMENT OF PROPOSAL EARTHQUAKE-PRONE PRIORITY BUILDINGS OCTOBER 2018 – WELLINGTON CITY COUNCIL (WCC)

1. Introduction

- Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead historic heritage agency.
- HNZPT makes the following submission on the Wellington City Council consultation on Earthquake-Prone Priority Buildings - Identifying High Traffic Routes and Emergency Transport Routes.
- HNZPT has not specifically commented on the proposed routes but focuses its submission on the priority buildings which are heritage buildings and the support package for building owners given there are a high number of heritage buildings within the proposed routes. Further comment is given on Turnbull House, managed by HNZPT, which is within a proposed route.

2. Submission

Safety

- The strengthening of earthquake-prone buildings is important for public safety and facilitating response and recovery in the event of an emergency.
- HNZPT recognises the requirements to identify priority buildings concerning high traffic and emergency transport routes will necessarily encompass heritage buildings. There are a high number of heritage buildings along the proposed routes including significant concentrations on Cuba Street and Lambton Quay.
- While the Building Act allows owners of Category 1 heritage building to seek an extension of time, HNZT supports and prefers seismic strengthening of heritage buildings within any

identified priority routes to occur under the same timeframes as non-heritage buildings, particularly where this can occur in a coordinated way.

Incentives and support

- For heritage buildings the Proposal states: “... *The Council believes the survival of heritage buildings should be actively promoted ...*”¹. HNZPT supports this specific recognition.
- The Proposal takes into account the particular circumstances of undertaking strengthening works for owners of heritage building owners, which is supported as this can include any necessary design and resource consent requirements.
- HNZPT supports a comprehensive support package for building owners, including owners of heritage buildings.
- In addition to the incentive funds stated in the Proposal, HNZPT notes it administers its own grant/fund scheme, the National Heritage Preservation Incentive Fund. <http://www.heritage.org.nz/protecting-heritage/national-heritage-preservation-incentive-fund>
- There are also other methods or tools which can assist in the form of education, advice and assistance, such as the interactive video tool published on line by the Ministry Business Innovation and Employment. <https://www.building.govt.nz/managing-buildings/managing-earthquake-prone-buildings/>
- HNZPT would seek to ensure that any support package is clearly detailed as relates to heritage buildings and non-heritage buildings, including the range of support methods. HNZPT further recommends that any support made available is undertaken in a co-ordinated way.

Support and co-ordination

- HNZPT supports strengthening multiple buildings in a co-ordinated way, such as through initiatives to facilitate meetings with adjoining owners through the Earthquake Resilience Team at Council (Statement of Proposal page 18). An approach, which includes careful attention to how a group of buildings is strengthened—including heritage buildings—may assist in achieving more effective and efficient outcomes for multiple buildings and owners and reduce or remove the potential for damage due to pounding.
- Although HNZPT submission is focused on heritage buildings (being those entered on the New Zealand Heritage List/Rārangī Kōrero or scheduled in the District Plan), strengthening buildings that contribute to heritage streetscapes can assist in preserving the heritage character of these streetscapes.

3. HNZPT - Turnbull House, 25 Bowen Street

- Turnbull House is managed by HNZPT on behalf of the Crown. It is a Category 1 Historic Place that is located within one of the proposed routes. HNZPT recognises the need to strengthen this building in accordance with the specified WCC timeframes. HNZPT seeks to undertake this strengthening work in a timely manner and in a way that enhances its heritage values.

¹ Statement of Proposal, page 17.

- HNZPT has received a notice that the building requires remediation on or before 2023, and this date is unchanged with the Statement of Proposal.

4. Recommendations

Heritage NZ makes the following specific recommendations:

-  Retain and expand support for building owners in the form of advice and assistance, such as financial incentives, including owners of heritage buildings.
- b. Ensure that the available information on support, such as guidance leaflets and website content, clearly sets out the full range of options available, including the HNZPT National Heritage Preservation Incentive Fund.
- c. Provide clear communications about timeframes for building owners where a building is identified in a high traffic route or emergency transport route, and the owner has already been served with a remediation notice under s124 of the Building Act.

4. HNZPT does wish to be heard in support of our submission.

Yours sincerely



Jamie Jacobs
Director Central Region

Address for service

Heritage New Zealand Pouhere Taonga
Central Region
PO Box 2629
Wellington 6140



How the Building Act has plunged my partner and I, and hundreds of other home owners, into a life crisis we could never have anticipated

Hazel Kirkham
Co-owner of a Wellington city apartment
 30 April 2018

Our story.

In 2012 Wellington City Council served our body corporate with an Earthquake Prone Building notice under the Earthquake Prone Building provisions of the Building Act 2004. The notice required the body corporate to strengthen an apartment building in the complex which the WCC had assessed as 'earthquake prone', to at least 34% of the National Building Standard (NBS), or demolish it.

If body corporates don't comply with these notices within a set timeframe, the Council has the power to enforce demolition and charge owners for reducing their homes to rubble.

If my partner and I had chosen to buy a house instead of an apartment, this horror story would not be happening to us because only units in buildings of more than 2 storeys and more than 3 units are subject to the legislation.

By sheer accident we are amongst perhaps thousands of apartment owners whose homes, security and indeed lives have been put in jeopardy by a piece of legislation that was designed with commercial buildings in mind and drafted on the basis of deeply flawed policy work.

We bought our apartment in 2010. It was worth about \$480,000 and represented the vast majority of our capital. We were aged 58 and 63. Our retirement savings had vanished with the 2008 global financial crisis, so we knew we had to work another eight years or so to become mortgage free and put some savings back in the bank. Nevertheless, we felt secure and looked forward to living in our apartment

until we needed to sell or use the equity to fund aged care.

Then in 2012, out of the blue, all that changed.

With the issuing of the EPB notice, the complex had a blighted LIM (land information memorandum) and our apartment's value plummeted.

However, like many other owners in the same boat, we were pragmatic. We thought we should play our part in making the country safer by upgrading our building, as one might upgrade electrics or put in double glazing.

After two structural engineers had assessed the buildings, we understood that strengthening would be relatively straightforward and the costs bearable. In our case, early estimates indicated we would have to contribute around \$30,000.

We were keen for the work to be done quickly so that values would spring back and we'd be out of our suspended capital situation. It was not to be.

Six years later, the strengthening has not been done and the situation has become much, much more frightening.

Engineers have discovered that another building in the complex is earthquake prone. As the characteristics of the existing structures have become better understood, so the engineering challenges have become more apparent. Prices for construction materials and labor have gone up astronomically. Legal obstacles and risks have been identified. Just finding out what might be involved costs money, to date around \$100,000 and counting. So far, most owners have been prepared to pay their share. But it's like a horror movie where just when you think you know what's going on, some new terrifying twist in the story is introduced.

The latest cost estimate for strengthening our buildings is around \$25m for construction and remediation. The cost of professional fees, GST, owners' interest on loans, and paying for living elsewhere for two or three years, would be on top of that.

It seems sensible to work on a figure of \$30m, an average of over \$1m per owner. That's more than the apartments would be worth after the work was done.

Not only is the cost prohibitive, but the legal process by which the body corporate could achieve compliance is riddled with risk.

In the legislation, the alternative to strengthening is demolition. That would cost maybe \$20,000 each. But owners would still have lost their homes.

Our body corporate committee has been looking at other alternatives including completely rebuilding, becoming a developer to redevelop the site with more units to raise revenue, and selling the site. Though the latter option might give owners some cash instead of debts, it might be easier said than done as the Unit Titles Act has nothing to say about how a body corporate can achieve a sale of the common property or what to do if not all owners agree.

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.

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.

Even specialist lawyers are of little help as there are no precedents to go on and the Unit Titles Act is spectacularly inadequate.

Meanwhile, owners' initial pragmatism has long gone. For owners in some body corporates, strengthening costs will be low because the buildings lend themselves to simple strengthening solutions, but many are facing the possibility of losing their homes and/or being forced to take on debt they cannot service. They know now that the nebulous public benefits promoted by the then Government are in fact negligible. Reality is beginning to kick in.

Owners are shocked that this can be happening in New Zealand. They are desperate but remarkably accepting of the fact that the legislation makes them liable for the cost of compliance, whatever that may be, and that that may mean they will lose their homes and be saddled with crippling debt. Many will become insolvent. For some, bankruptcy will be the only way out.

Bankruptcy will quite possibly be our way out. We are fortunate in that being self-employed we are able to go on working for the time being. As all our work is in Pacific island developing countries we have moved to live in Vanuatu so that we can live more cheaply and rent out our Wellington apartment. Most owners of our age, now 66 and 71, do not have such options open to them. But even if we are able to continue earning, a \$1m loan, even if we could raise it, would mean selling our apartment to pay off some of the debt when the work was completed, and walking away homeless, with a balance of debt we could not afford to service. We would have no option but to file for bankruptcy and start renting.

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.

Poor policy analysis leads to poor legislation.

I have done some research into how the legislation came about and have been shocked to find that the policy work behind it does not present a compelling case in terms of cost v

benefits and does not include any analysis of consequences.

The scope of the policy work was narrow and shallow; the numbers of affected buildings and costs were highly speculative; and ‘buildings’ and ‘building owners’ were treated as generic groups to which a one-size-fits-all approach would be applied.

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.

Commercial building owners differ from private owners in a crucial way. For commercial owners, buildings are business. Owners can offset the costs of compliance against tax, claim back GST on costs, and pass on costs through rents. Private homes owners on the other hand, must bear all the costs themselves including GST, and cannot claim costs against tax.

Other problems were that the number of affected buildings was highly speculative and cost estimates were limited to building costs only. These estimates were little more than ballpark numbers given the paucity of information available or sought. The costs of professional fees and remediation associated with the projects, associated code compliance requirements, resident displacement, and cost of money were ignored. Social consequences were not analysed at all.

My understanding of the Cost Benefit Analysis produced by MartinJenkins for MBIE in September 2012, is that the very best case, if all EPB buildings in the country were strengthened to 67% NBS at a cost of \$5,974,000,000, (based on an estimate of around \$640 per square metre which is probably significantly less than the actual costs being estimated now), would be a drop in expected deaths from earthquakes per year from an average of 8 since 1929, to an average of 5.65.

No analysis was provided to show the relationship between who bears the costs, the benefits expected, and who the beneficiaries would be. For example, are the beneficiaries the public outside the buildings, or residents inside the buildings?

MartinJenkins concluded: “On a probability basis, costs are well in excess of benefits. Even under extreme sensitivities, this relationship does not change.” Similar unequivocal conclusions appear in MBIE’s own documents.

If strengthening will have little effect on risk of death or injury in an earthquake and owners are going to suffer financially, does anyone benefit from this legislation?

Owners are effectively gifting their homes, life savings and more to the construction industry.

As this is about property, one person’s loss is someone else’s gain. Almost every dollar of property value lost by an affected owner, or contributed by an owner to pay for strengthening, is transferred to the pockets of the building industry.

Body corporates with earthquake prone buildings is a whole new market segment that has opened up for the industry as a result of this legislation.

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.

Banks will lose money if owners default on their mortgages, but they will win on lending to owners to fund strengthening work.

Developers are circling to make a killing where owner have no option left but to sell.

Some owners will not be able to raise loans from high street lenders.

During consultations, organisations representing owners made the case that private individuals would be expected to pay out large sums that they may not be able to afford, for what was essentially a public good. Their submissions were noted but ignored.

Had individual apartment owners been aware then that they would be hit by the problems that are now becoming evident, they would almost certainly have been lobbying against the legislation in numbers, but most would not have been aware of any of the consultation process. Anyway, would not have known at that time that they would be affected.

Early on, when strengthening cost estimates were low, body corporates imagined that only a few amongst their owners would be unable to pay. The feeling then was that these owners could sell their apartments as soon as the strengthening plans were agreed, or perhaps they could be helped out by loans from neighbours.

Affordability is a much more widespread issue when the cost estimates are in six figures or way beyond the value the properties will fetch after the work has been done.

If and when a body corporate cannot find a solution that makes economic sense, what should that body corporate do? Surely, it cannot be morally right to expect owners to comply at any cost and vote for a solution that would result in owners having to 'walk off their land'.

This is a building issue, a housing issue and social welfare issue. It is also a justice and human rights issue. Article 17 of the Declaration of Human Rights says, b) No-one shall be arbitrarily deprived of his property.

Which makes it a political issue. How can a Government promote home ownership, profess concern about homelessness, and encourage people to plan and save for their later years, at the same time as allowing people to be deprived of their homes and plunging them into crippling debt to pay for something the

Government wants but that gives owners no commensurate benefits?

If it is right to force apartment owners to pay whatever it costs to strengthen their buildings, then why not force owners of all types of home to have their homes meet the NBS? Imagine the outcry that would create? If retro-strengthening existing buildings that otherwise meet the Building Code is a public good, then shouldn't that be paid for from the public purse?

If the benefit of saving an average of less than three lives per year, comes at the cost of people's homes and futures and billions of their dollars, is the law ridiculous, an ass?

Unlike with leaky homes, the problem is not the result of bad workmanship or material failure. In this case, no-one but the Government can be blamed for the problem.

There has been talk of the government stepping in to become a 'lender of last resort' to assist owners who do not have and cannot borrow sufficient funds.

For the government to offer loans for owners to comply with the legislation is a bit like a robber offering to lease back your stolen goods.

The homes and lives of home owners are the collateral damage of politician's impetuous to do the right thing after Christchurch.

Did the politicians not know what they were doing when they voted 120:1 in favour of the Building (Earthquake Prone Buildings) Amendment Act 2016?

Why did so many MPS vote for EBP legislation when the policy work was so inadequate, when there were so many unanswered questions about consequences, and when the estimated benefits were so tiny compared to the billions of dollars of cost that was going to be heaped onto businesses and private home owners?

Why did nobody notice or care that the case for the legislation was so flimsy and the unintended consequences so dire?

The kindest explanation is that politicians and officials, spooked like the rest of by what had

happened in Christchurch, were swept along on an emotional wave of righteous indignation.

The legislation, at least as it impacts private home owners, is iniquitous – grossly unfair and morally wrong. Its consequences are perverse.

An official Q&A document on the proposed changes to the Building Act 2004, stated that the new legislation, “... aims to strike the right balance between protecting people from harm in an earthquake, the costs of strengthening or removing buildings, and impacts on heritage.”

Is the legislation actually achieving the right balance between protecting people and costs? Real life experiences in Wellington would suggest it is not.

In its quest to save lives and property, the legislation is putting people homes, futures and possibly lives in jeopardy. Put that on the ‘cost’ side and the benefits are invisible.

These people have done nothing wrong. They could not have anticipated, planned for or insured against the situation the legislation has put them in.

Body corporates and individual owners are already finding themselves in no go situations that could last for years. Their plight, and the ripple effects, will soon start to become more public. But who in Government listening? Who is Government or MBIE really knows what is happening and what might happen next?

The Government must look at this legislation, urgently.

Agency Disclosure Statements on the system for managing EPBs, in 2013 and 2015, and the Regulatory Impact Statement, in 2017, include sections on Monitoring, evaluation and review.

I recently asked MBIE for “a copy of the monitoring and evaluation strategy/plan/process/TOR being used to assess the implementation and impacts of the Building (Earthquake-prone buildings) Amendment Act 2016 and the regulations.”

Their reply on 20 April - “MBIE is intending to monitor and evaluate the EPB system - this

work is still in the planning stage (so we do not have a document we can provide at the moment) but is likely to involve working with Territorial Authorities and gathering feedback from building owners and engineers.”

It sounds like the Government and buildings owners might be waiting a very long time to hear officially what many of us in Wellington already know.

The Government must bring forward the promised review of the EPB provisions in the Building Act, which must be wide ranging and include fresh forecasts and a fresh cost benefit analysis.

The review should focus on Wellington. As the first adopter, now more than 10 years down the EPB track and with over 600 buildings on its EBP list, the city provides the ideal case study and the canary in the mine for the rest of the country.

To say that my partner and I, and hundreds of other home owners, have been plunged into a life crisis by this legislation is not an overstatement.

Though no fault of our own and without any benefits in return, we have had the value of our home taken away and we may lose our home altogether. We face the prospect of colossal debts and uncertain futures, perhaps homelessness.

We expect this Government to find out what is happening, and then equipped with the facts, consider changes to legislation before people are forced into life changing decisions they cannot reverse.

The review is urgent.

Hazel Kirkham

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These are my personal views and do not represent the views of our body corporate, our body corporate committee, or other owners

From: [REDACTED]
Sent: Monday, 26 November 2018 3:07 p.m.
To: Mike Mendonca
Cc: Baz Kaufman; Councillor Iona Pannett
Subject: Priority buildings consultation

Hi Mike and Baz

Below is my submission. If you would like me to present it in a PDF or some other way, let me know.

I'm in the middle of writing a paper covering all the issues I see with the legislation, and I'm also trying to put together a couple of one-page graphic summaries of the main points. Either of both might be useful to you later, but in the meantime these notes are best I can do for now. Happy to discuss.

Consultation on Priority Buildings proposal

Speaking as an owner of a unit in a residential complex that includes buildings that have been deemed to be earthquake prone and that have now appeared on the priority buildings list, here are my views:

1. Unacceptable level of control over people's lives and assets

The EPB legislation already put WCC in the position of having an unacceptable level control over the lives and assets of thousands of private individuals who own property in the city. By winding back the compliance deadline for many of those people, the council is cranking up that control.

Currently, communication with affected owners is perfunctory. The EPB legislation is forcing residential owners to put their assets, health and future security at risk, for no discernible benefits to them, yet WCC is offering nothing more than fluffy words by way of a case – like as if it is perfectly normal and justifiable for this to be happening.

2. Risks heaped on top of risks

By pushing ahead to identify 'priority buildings' and then serve notices on their owners, WCC is heaping a new pile of risks, to owners, the council and the community, on top of an existing pile of risks created by the EPB legislation, when even the original pile of risks hasn't been scoped, analysed or understood.

3. Hearts ruling heads – not a recipe for justice or success

WCC has blinkers on, and is forging ahead fuelled by the same kind of emotional fervour that saw 120 MPs vote yes to Subpart 6A when they had no idea what the consequences of their careless actions would be. But it felt good to be doing something to calm the nerves of the New Zealand public after the Christchurch quakes. WCC needs to stop, think, and consider very carefully what the consequences and risks of its actions are.

4. Answer this simple question to see if WCC and owners have big problems on their hands.

Can WCC show that ALL affected residential owners will accrue net benefits if they comply with the legislation?

5. If the answer is YES, then great, show us all how that works.

6. **If the answer is NO**, then get real. Why would any sensible person comply? This kind of ‘pay up, do as you’re told or take the consequences’ approach is otherwise known as coercion, standover tactics or extortion. Not acceptable (possibly not legal?). So explain to owners please, why it is ok to force them to put their assets, health and future security at risk in order to comply. Explain the rationale for requiring home owners to:
- Enter into multi-owner agreements to implement, pay for and accept joint and several liability for the risks of, complex construction projects, that will put at risk their assets, health and future security
 - Pass management of their assets to third parties eg body corporate officer bearers, project managers
 - Take on the responsibility for complex construction projects, even though, as they have no professional experience or expertise in doing that kind of work, they will be weak and vulnerable clients
 - Sell their assets at a loss because other compliance options are not financially viable
 - Give up their homes for demolition by WCC, at owners’ cost, if they fail to comply

7. Heads up on some flaws and consequences you might have missed

Costs, benefits, funding and risk

- The intended beneficiaries of the legislation are members of the public. The likely benefits were estimated in the original CBA as **72 lives saved in 100 years (average of 0.72 lives per year) across the whole country, a social cost saving of \$25m.**
- The CBA cost estimate for achieving those benefits was **\$928m.**
- Experts concluded that the cost benefit ratio did not justify the proposal that eventually became Subpart 6A. MPs ignored that advice.
- My latest estimate, based on the original scoping used by MBIE, using real life experiences of owners, and covering all the cost items, not just construction, is around **\$4.8 billion.**
- **That’s a cost per life saved of \$80.2 million. Does that look like a sound investment to you?**
- Thousands of private individual building owners are being forced to commit an indeterminate amount of their own, or most likely borrowed capital, to fund what is in effect a government programme of risk reduction – a public good, with a rationale that would not stand up to normal public sector or commercial scrutiny.
- In return for risking their assets and disrupting, even wrecking their lives, building owners get nothing. They may lose their capital and end up homeless and in debt. *Is that fair, or scandalous?*
- Despite having no professional experience and expertise, owners are being forced to take responsibility for large and complex construction projects and carry all the risk. They are weak and vulnerable clients.
- Unlike commercial owners, residential owners must pay out of after-tax income, and pay GST.
- Being a victim of the system will lead some owners, young, old, poor or well off, to have mental and physical health problems including perhaps suicide, because they are so overwhelmed by the injustice of the legislation and what will happen to them because of it, that they cannot see how they can ever recover their normal lives.
- And what’s the plan for all the construction and demolition waste?

Scope – Never mind the evidence, how many can we catch?

If any buildings are to be strengthened or demolished it should be those that have a high likelihood of collapse in the event of a moderate earthquake. These will mainly be those with construction faults, as with the CCTV building in Christchurch.

However, as well as identifying those building, the assessment and rating methodology being used scoops up large numbers of buildings which don't have a high risk of collapse which it nevertheless deems 'earthquake prone'.

The methodology being used is not evidence-based. It was championed by people in the construction industry whose interests are in labelling as many buildings as possible as earthquake prone. Also, engineers tend to err on the side of caution for fear of being sued later, and because they are still learning about this new branch of their business.

To Wellington residential building owners, who by definition accept a level of risk from earthquakes, this all seems bizarre and unnecessary. We cannot see the point of wrecking good buildings or wrecking lives in order to achieve infinitesimally small reductions in risk. Inevitably, what owners lose, and developers and the construction industry will gain. Government tax revenues will do very nicely too.

Working in the dark

Building owners are major stakeholders in this scenario. Not only are they being forced to pay for nothing, but they are kept in the dark. That could be because the Government and WCC are in the dark too. Neither the Government or WCC has bothered to show owners that they know what the consequences of the legislation will be, that they have credible plans (you know, the kind of thing that would stand up to Treasury scrutiny), or what's really going on.

Some tell-tale signs the whole thing is out of control: No programme plans. No evidence of systems thinking, or business case or logic intervention modelling applied. No recognition of the complexity of the context in which the system must operate. No proactive engagement with key stakeholders - residential building owners. No analysis of financial viability. No statement of assumptions. Inadequate data. No consideration or analysis of social, economic, or environmental impact. No plans for what to do with owners and tenants who must vacate their homes which construction work is going on, or who lose their homes. No credibility. No trust.

8. My conclusion?

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. Instead, this legislation forces residential home owners to participate in a scheme, the like of which is not applied in any other public risk reduction strategy, that makes them responsible for implementing and paying for something that will produce few if any benefits for anyone, putting their assets, health and future security at risk under threat of fines and having their assets destroyed.

Put bluntly, residential home owners are the victims of a money-grabbing scam and regardless of whether that was ever the intention, the injustice must be stopped.

9. I am waving a red flag and blowing a whistle.

I am warning WCC that there is a disaster happening, to owners, who are your ratepayers, and to the council.

10. WCC must wake up to reality and refuse to be complicit in this injustice

Yes, WCC has a statutory duty to comply with the legislation. But it is not acceptable for intelligent people, WCC councillors and officials, to take the attitude, *well we have to do what the legislation says, so you have to do the same, even though it doesn't make sense, is probably not going to work, isn't fair and equitable, and may well wreck your lives.*

WCC should not be going along with something it knows to be wrong. It should be demonstrating to Government, by use of evidence and modelling, why and how the policy, the legislation and system are flawed.

Happy to discuss with anyone

Hazel Kirkham

(working overseas so need to contact me by email in the first instance)



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23 November 2018

Priority Buildings 259/1001
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Re: Earthquake-Prone Priority Buildings

This submission is from the Architectural Centre. We are an incorporated society dating from 1946, which represents both professionals and non-professionals interested in the promotion of good design.

This consultation responds to the new requirements of the Building (Earthquake-prone Buildings) Amendment Act 2016 (s133AF(2)(a)), which requires councils to:

"identify any part of a public road, footpath, or other thoroughfare in an area of medium or high seismic risk

- (i) onto which parts of an unreinforced masonry building could fall in an earthquake; and*
- (ii) that has sufficient vehicle or pedestrian traffic to warrant prioritising the identification and remediation of those parts of unreinforced masonry buildings"*

Additionally, the definition of an earthquake-prone building (EPB) (s133AB(1)(b)) includes that:

"if the building or part were to collapse, the collapse would be likely to cause -

- (i) injury or death to persons in or near the building or on any other property; or*
- (ii) damage to any other property"*

We have the following comments to make regarding the proposed Earthquake-Prone Priority Buildings policy:

The need for a proportionate response

1. The Architectural Centre considers this policy to be an over reaction to the legislative requirements. We note that:
 - (a) 398 people died from car accidents in NZ in 2017
 - (b) 350 deaths per year are estimated to be from past exposure to second-hand smoke in NZ.¹
 - (c) In 1931 256 were killed in the Napier earthquake. Eighty years later, in 2011 185 people were killed in the Canterbury earthquake. If both of these events are included over this 80 year time period, this would equate to an average of 5.5 deaths per year.
 - (d) The NZ Society for Earthquake Engineering have estimated that "the risks of occupying a building performing at 33% NBS equates with the risk of flying in a commercial aircraft, or travelling 10,000 km or more by road per annum."²

Consequently we recommend a proportionate response to earthquake risk

¹ Ministry of Health "Smoking" <https://www.health.govt.nz/your-health/healthy-living/addictions/smoking>

² Hamilton East Community Trust v Hamilton City Council [2014] NZEnvC 220 at [10]

which acknowledges this context. The council's response needs to be measured and proportionate to the actual risk, not react to uninformed perception.

Council externalising risk (and cost)

2. 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. The legislation states that: "*The owner of a building or a part of a building that is subject to an EPB notice must complete seismic work on the building or part on or before the deadline.*" (s133AM(1)). It does not however exclude a territorial authority from funding any additional cost that a shorter time frame will cause (e.g. bringing forward the cost of loan finance). Council should fund this, not private owners. Externalising these costs also removes the consequences of the "wide net" approach that this policy currently takes, and which we believe needs a more careful and focussed revision.

Inadequate Consultation

3. Additionally, we consider this important consultation to be both inadequate - largely due to insufficient information being supplied - and poorly timed for the following reasons:
 - (a) 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.
 - (b) Nowhere in the document are quantifiable measures used to indicate the threshold above which traffic qualifies as high traffic. There is no measured justification for the proposed list of roads. The MBIE criteria refer to "a concentration of workers," "heavy use bus routes," and "busy intersections" (p. 10). All of these are quantifiable, and they should be quantified in order to enable public scrutiny of the threshold.
 - (c) Similarly p. 11 refers to "cordon counts," yet none of this data is provided to enable the public to give informed feedback on the proposal.
 - (d) In order to be a viable process of public consultation we need to know the threshold levels that the WCC is using for these definitions of "High Pedestrian Areas" and "High Vehicular Traffic Areas." For example:
 - i. is this an absolute level or the top percentage, or has a gut feeling determined this selection? How would we know? Where is the evidence?
 - ii. Are both traffic and pedestrian counts used in all decisions, or for some thresholds is only one of these quantities used to justify the inclusion of the street?
 - iii. We also need to know the cordon counts for all of the streets and footpaths listed on pp. 12-14.
 - iv. Additionally we need to know whether the whole of the road is affected or only part of it. How is this indicated?
 - (e) In a similar vein will the identified street (and so priority buildings) change as traffic volumes change due to city developments? What is the mechanism to facilitate this?
 - (f) There are some streets which appear to be anomalies. For example is the dead end Garrett St really a high traffic street?
 - (g) It would be helpful if streets were listed in alphabetical order.
 - (h) 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?

Financial support

- 4. As indicated above, the Architectural Centre asks that Council fund the consequences of shortened timelines because the function of this legislation is ensuring a safe public realm. Additional to this we note:
 - (i) In the section titled "Support for building owners" the level of support is not explicitly indicated for rates remission when a building is empty or when a building is removed from the EPB list. What is the amount of rates remission? or is this to be negotiated on a case-by-case basis? The lack of information regarding this contrasts the 10% (to a maximum of \$5,000) stated in relation to building consent subsidies.
 - (j) Similarly what are the processes for a building owner who disagrees with council identification of their building as a priority building?

New round of consultation is needed

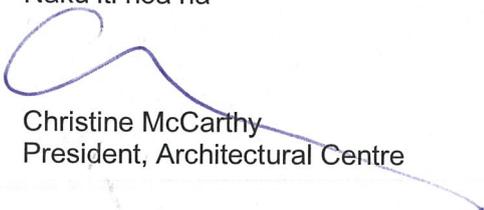
- 5. Consequently we ask for these omissions and inadequacies to be addressed and for another round of consultation to be organised. This is an important issue that will have significant financial consequences for many ratepayers. It must be done properly.

Other

- 6. We have the following additional comments to make:
 - (a) We support the references to infrastructure investment to support the ability of our city's buildings to facilitate city resilience. Additionally, it is important to ensure that a culture of good building maintenance is supported. This will ensure longer-life and more resilient buildings, and is as important as the physical rebuilding and renewal of infrastructure.
 - (b) We also note the increasing size of our mobile infrastructure for commerce (e.g. coffee carts and food trucks), and the potential for this infrastructure to grow as part of a more comprehensive approach to post-disaster resilience. In this regard we note that this mobile commerce has built-in base isolation. A council strategy regarding this infrastructure is also important for post-disaster resilience.
 - (c) We support the acknowledged need to protect heritage EPBs. We also encourage the council to proactively identify heritage buildings especially mid-twentieth-century and later buildings and public spaces. We note the Bucket Fountain is yet to make it onto the heritage list - but should be there.
 - (d) In addition we ask that the WCC lobby government for a tax rebate on the cost of strengthening buildings, with higher rebates for heritage buildings. We understand that the economic benefits of strengthening of heritage buildings in particular largely accrue to local and central government, due to job creation and heritage tourism, rather than the building owner, justifying such tax rebates.

Thank you for this opportunity to comment on the proposed Earthquake-Prone Priority Building policy. If you have any questions please do not hesitate to contact us.

Nāku iti noa nā



Christine McCarthy
President, Architectural Centre

WCC EPB Priority Building High Traffic Routes and Emergency Transport Routes – Nov 2018

Do you agree with the proposed high traffic routes?

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.

Has the Council modeled the impact of this policy? e.g. how many EPB buildings and individual home owners/building owners will be affected; what is the estimated cost of the policy (private & public); do all the buildings pose the same risk to egress along the emergency and priority roads?

The proposed routes look OK.

However, I do not agree that all EPB along these routes should have the time period for remediation reduced.

Will buildings along the priority routes similar to the buildings that 'failed' in the Kaikoura 2016 earthquake be assessed and required to be remediated within 7.5 yrs of notice?

Do you agree with the proposed emergency transport routes?

The proposed routes look OK.

See above comments.

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Why is Oriental Parade not connected to Evans Bay & CBD on the maps?

How can the Council best support building owners meet requirements for remediating their buildings?

It is clear that improving the resilience of our cities is prudent, it is also clear that earthquake strengthening is very complex and expensive.

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.

Indeed, 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. Costs many owners are facing for seismic strengthening work show that the available 'support' is completely insignificant compared to the actual costs of strengthening. Currently individuals are being required to privately fund expensive mandatory seismic strengthening works for a public good.

There are significant costs associated with remediating buildings. Some current cases are demonstrating that strengthening is not fiscally viable or rational.

I own an apartment (which obviously complied with all the building regulations and requirements at the time I bought), in an EPB along one of the proposed priority access routes. We have been advised that owners would have to pay over \$700,000 each to strengthen. 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.

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.

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.

I think the number of individuals affected by the EPB legislation has been hugely underestimated.

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 with 195 residential and 70 have BCs. Without accurate data, how can the Council, or Government, determine the impact of this policy. How many EPB are along the proposed high traffic and proposed emergency transport routes? 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)?

The issues facing numerous home owners residing in buildings deemed earthquake-prone are very complex, in many cases financially crippling, and there is limited national guidance or support. We are private home owners, not developers. Other issues that need to be considered and solutions sought for include:

- Will the required NBS change in the near to medium future - thus potentially catching out owners/BCs that only went to 34% NBS (or even perhaps 67% NBS)? Can the Council/Government assure that the building code will not change?
- Even if owners were willing to pay the price of strengthening will they be able to raise loans to fund the strengthening works?
- Would banks lend money to individuals that plan to strengthen to the lower 34% NBS rating?
- What is/will be the NBS level banks require?
- Would banks extend mortgages/lend money to fund individuals to strengthen buildings if the banks calculate that the loan-to-value ratios is not adequate?
- Banks won't lend for strengthening to people close to retirement age.
- 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. If many buildings are underinsured, or indeed not insured, it leaves cities no further ahead and no more 'resilient' than prior to the EPB Act. The impact of a significant event (earthquake, major storm damage etc) will still impact considerably on public funds. If we can't get insurance, or adequate insurance, people may not be able to get mortgages even if the building was strengthened to the legal NBS level.
- There is concern that the availability of experts (e.g. engineers, architects and construction builders). 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.
- 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?
- 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.

Is there anything else we need to take into account in setting these routes?

See above comments for concerns around reducing the time period for remediation and the overall impact of the EPB Act.



INNER-CITY WELLINGTON

Te Reo Pokapū o Pōneke

VOICE OF TE ARO AND WELLINGTON CENTRAL

| | |
|---|--------------------------------|
| Name: | Geraldine Murphy, Deputy Chair |
| Email/phone number | [REDACTED] |
| On behalf of an organisation | Inner City Wellington |
| Yes, we want to speak to all Councillors at an oral hearing; morning is preferred | |

Inner City Wellington (ICW) submission on Priority Building Consultation

Key points:

- ICW does not agree that all the streets included are high traffic routes.
- The approach to the identification of high traffic routes is too broad (eg, includes short ‘no exit’ streets to Lambton Quay) and there is insufficient evidence to justify the inclusion of many streets.
- An independent review should be undertaken of the approach to identifying URM buildings that are not currently earthquake-prone, and the determination of high traffic routes, to provide assurance that the buildings and streets fit the criteria: *thoroughfares meeting the criteria must also have a URM building located on them **whereby there is the potential for a URM part to fall onto the identified thoroughfare.***
- ICW agrees with the emergency transport routes for Te Aro and Wellington Central.
- WCC must provide directly, and lobby Government for, financial and programme support mechanisms given the public benefits being obtained from earlier strengthening for public safety and emergency response access.
- 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.
- 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.
- The priority building provisions were implemented after the majority of owners in affected buildings bought their properties. And the majority of owners of earthquake-prone buildings, who ICW engages with, bought prior to the Building Act 2004. Some have outlined the due diligence they undertook, including talking with WCC about any future issues, and only found out when the ‘potentially earthquake prone letter’ arrived. In short, they did not buy knowing this was coming.

ICW has used the MBIE Register of Earthquake Prone buildings (as at 23 October 2018) to assess the inclusion of the high traffic routes and identification of URM buildings.



Q1. Do you agree with the proposed high traffic routes?

No – 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 (according to Mike Mendonca at the 30 Oct meeting) and where there is no data, the street is included under the precautionary principle without any assessment of the risk.

- MBIE guidance¹ (p18) says that *‘thoroughfares meeting the criteria must also have a URM building located 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 is not sufficient.
- 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.
- 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, Ballance St, Buckle St, Claytons Ave, Garrett St, Feltex Lane, Leeds St, Lukes Lane.
- 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?
- ICW questions how WCC is still identifying URM buildings in the CBD that have not been assessed previously, when WCC started the process in 2006.
- ICW would like independent assurance that:
 - 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.

Q2. Do you agree with the proposed emergency transport routes?

Yes – response is just for CBD routes

Q3. Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Yes – ICW considers WCC has been over-inclusive for the reasons outlined in the response to Q1. There has to be clear rationale for identifying streets as high traffic routes and this is not the case.

- We understand the public safety issue on high traffic routes such as the Golden Mile, Cuba St, Taranaki St and Tory St with URM buildings on them that may have a ‘part’ that could fall down; this being the only criteria for identification of a URM building as a priority building.

¹ <https://www.building.govt.nz/assets/Uploads/building-code-compliance/b-stability/b1-structure/epb-priority-buildings.pdf>

- We question how there can be multiple URM buildings still being identified as potentially earthquake-prone 12 years after WCC started the process.
- 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?
- 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. We think all streets that are included as high traffic routes, but do not have identified earthquake-prone buildings, need to be reviewed by an independent person to confirm the URM buildings that have triggered the inclusion of these streets meet the criteria as set out in the MBIE Guidance on p18, and the pedestrian and vehicle traffic justify it being a high traffic route.

Q4. How can Council best support building owners meet requirements for remediating their buildings?

- 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.
- WCC should be helping owners progress the full seismic strengthening project wherever possible to avoid:
 - rework of the strengthening work for the 'URM part' in question that has shortened the timeframe
 - 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
 - additional financial burden due to the delays imposed by having to strengthen a 'part' because the full seismic strengthening work has not been fully scoped or able to be funded
- 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?
- For other buildings, WCC must apply the profile categories and where it uses the 'additional information' to identify other buildings or previously assessed buildings, it must provide the information that has informed its decision.
- Lobby the 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.
- 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.
- Progress the Strategic Housing Investment 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) to negotiate an arrangement and provide WCC a means to increase housing supply in Wellington on an inner city site.

- Lobby the Government for flexibility on timeframes when capacity constraints and resulting rising costs place further unreasonable financial burdens on owners.

Q5. Is there anything else we need to take into account in setting these routes?

- WCC should be using a risk-based assessment to identify high traffic routes using the number of URM buildings on a street, the use of the building and the volume of traffic. 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.
- Reducing the timeframes for owners places them under further financial stress. The majority of owners (especially apartment owners) ICW engages with bought their units or apartments:
 - prior to the Building Act 2004, which led to WCC beginning the assessment process
 - prior to the legislation changes in 2016, which introduced 'priority buildings' provisions
 - have no reasonable choices about this burden.
- The lack of robust approach to the identification of high traffic routes and lack of information on how priority buildings on emergency transport routes will be identified increases the stress.

23 November 2018



19 November 2018

Hayley Moselen
Team Leader
Seismic Assessments
Wellington City Council
P O Box 2199
Wellington

Dear Hayley Moselen

My thanks for your undated letter but received by our building managers, Oxygen Ltd on 14 November on the subject of priority earthquake-prone buildings. It is not clear whether this addressed to me as an individual ratepayer or as chair of the Blythswood association of owners, but I need to point out that although you claim to have written to me previously on this subject I have no record of having received such a communication in either capacity.

If it is the former then my address is [REDACTED]; if it is the latter I need to reiterate the message I have communicated to the Council on numerous occasions i.e. that the body governing this building can be addressed as you have done in this case through our managers at Oxygen Limited at P O Box 2199 Wellington, or directly on the premises at [REDACTED] t. The building address is not [REDACTED]. This an address used by one of our leaseholders, a Mr. Neil Patel; it is currently unoccupied by him and writing to me at that address may lead to it never being received by me. Would you please therefore use the correct address in future.

That said you have invited our submission on your intention to advance the date for bringing buildings up to earthquake standard as required by legislation. In particular you are identifying those earthquake prone buildings, of which Blythswood Flats is one, which may lie on emergency routes in the event of e.g. a severe earthquake.

We are located in part on Willis Street which is almost certain to become such a designated route, and possibly Aro Street also. We have no quarrel with this as an exercise; obviously it is simply a matter of common sense to keep such routes open in the event of an emergency. We are rather more concerned by the implications of it for the building owners (34 leaseholders as a cross lease).

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 (a project we have had under way for five or six years). 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.

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.

We would like to appear before any specific body or committee hearing public submissions on the issue to expand on our views.

Yours sincerely

Tony Simpson
Chair of the Blythwood Association

Earthquake prone buildings and priority routes consultation

We are responding to the document on priority routes: <https://wellington.govt.nz/have-your-say/public-inputs/consultations/open/priority-buildings>

Comments of Historic Places Wellington Inc.

About us

We are an independent incorporated society and registered charity, with a concern for heritage buildings in the wider Wellington region. For further information see our website: www.historicplaceswellington.org

General comment

This policy has important implications for owners of buildings identified as earthquake prone priority buildings in the identified priority route areas; potentially shortening the timeframe for remedial work (or demolition) from 15 years to 7.5 years. There will likely be far-reaching implications for heritage building owners and we believe a lot more pressure for demolition, which is of particular concern to us.

Proposed routes

We don't propose to comment on the identified routes as there are too many for us to consider the implications for all heritage buildings along these routes. We believe we must strike the right balance between perceived safety risks during an uncommon event like a major earthquake, and the knock-on economic and social costs of this imposed legislation. We wonder if too many routes have been identified, although we accept the council has applied various criteria such as traffic and pedestrian counts.

Heritage Buildings

We are pleased to note that Remediation relates to URM elements on the priority building that *could fall in a moderate earthquake onto the high traffic area and cause injury or death, not the entire building*. However, 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?

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. It is also good that the council document has listed sources of financial support. However, we believe not all owners who seek financial assistance will receive it. We understand that grants are not usually paid until completion of the work and we are aware of at least one owner of a heritage building given a grant that they have had difficulty in the meantime securing bank finance to complete the work (when the grant will become available).

Closing comment

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.

Felicity Wong
Chair, Historic Places Wellington
P.O. Box 12426
Wellington 6144 / EM: [REDACTED]

From: [REDACTED]
To: [BUS: Policy Submission](#)
Cc: [Councillor Iona Pannett](#)
Subject: Earthquake-Prone Priority Buildings
Date: Friday, 23 November 2018 2:01:24 p.m.

Kia ora,

I have decided to email my response instead, because the online submission form is laid out to ask questions that I think are completely besides the point.

I agree with the proposed high traffic routes and emergency transport routes. However, the entire pitch of this Statement of Proposal seems primarily focused on justifying how and why these priority routes have been identified, and not on the crucial issue at stake, which is the financial impossibility you are asking of us homeowners to fund this strengthening ourselves. I doubt anyone would disagree on the reasoning behind this proposal at all - that buildings on emergency routes should be strengthened sooner than buildings on less important pathways is stating the obvious and is really not the contentious issue here. By focusing the public debate on whether we agree that these routes have been appropriately chosen is to decoy away from the far more crucial issue of whether we as citizens can rightly be expected to financially cripple ourselves to service what is really primarily a civic responsibility to remedy. It is incredibly wrong to present this as an aside.

It seems a no brainer that certain buildings should be strengthened sooner than others if they pose a bigger risk to more people, and could lead to even more subsequent risk if emergency vehicles would be prevented from reaching those in need. So yes, I do agree that these routes should be strengthened sooner. However, this does NOT mean that I believe that owners should bear the full financial burden of strengthening along these routes, just because we agree (as any good citizen would) that emergency routes should pose less risks of obstruction. The pitch of this submission is extremely off target, and the real question should not be whether we agree with the chosen routes, but whose responsibility it is to bear the significant costs of meeting these expectations. 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. I feel what this all comes down to is that if the council really wants these buildings to be strengthened in such an extravagantly shortened timeframe, then the council needs to take proper responsibility and fund the work. It is not at all reasonable to expect homeowners to fund this themselves within this timeframe, so if getting the work quickly is the council's main priority then the council needs to take ownership of making that happen, which I think will only really be possible if it makes significant funding contributions towards the strengthening, and starts the ball rolling very soon so the limited engineering resources will mean there's actually time to make it happen. Perhaps by paying for half the strengthening (or more), to make up for halving the timeframe allowed for getting the work done.

In the "Support for Building Owners" section, there is mention of rates remission for buildings in the commercial, industrial and business sector, with no mention for residential homeowners like me,

who are absolutely going to be the hardest hit. The statement that “most private homes and residential buildings will not be affected by this proposal” on page 20 of the statement of proposal demonstrates that you are not considering homeowners at all in your decision making, who are by far the most vulnerable in this scenario and need the most consideration and support here. Landlords can take big financial hits but are still not going to lose their own homes over any of this, yet there are those among us who are facing losing everything, so there needs to be some acknowledgement of the different tiers of burden we are facing and a recognition that for many of us this is a distressing on a far more personal level. This was clear at the meeting last month, and 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. If there aren’t so many of us homeowners among all the property investors, then surely the council could cover the costs for those of us who have their entire life’s savings tied up in the shaky roof over their head, with no chance of selling, and no ability to finance another mortgage with our incomes alone. I understand why the council would be reluctant to fund one property if it then faced having to fund all others for equal treatment, but if there are very few of us in the residential/homeowner category it may not be a big cost to support those of us in this most vulnerable economic tier. It is simply unfair to make the same financial demands of the Working Poor as commercial property owners and property investors – investors who won’t have to face the nightmare of how they’re going to afford to pay to rent somewhere while also paying the rent on a house they can’t even live in, plus no way of servicing an enormous new loan for strengthening work, which will be impossible to get anyway, and all the rest. I’m glad you got to see my tears at the meeting, because this is a deeply troubling problem ahead of me, and I’m scared. I’m a 30 year old woman with health issues living alone on my single low income, already struggling to pay my existing mortgage, and I run the very real risk of losing everything I own, if the only home I have is going to cost more to strengthen than it’s actually worth. Because of my risky low income status and the risky status of the building, I can’t even get a mortgage through a bank so had to get a mortgage through a second tier finance company at a much higher interest rate than the banks offer – which feels like being penalised for being poor. Add to that the exorbitant insurance premiums, and an inability to sell with so much uncertainty hanging over this property, and I’m feeling incredibly trapped and terrified. I still have no idea what it might cost to get our building strengthened, as we’re still waiting on engineering reports. And I have no idea what I’ll do if everyone else in the building wants to move ahead and has the ability to finance it, and I can’t afford to do anything.

The mention of a maximum discount of \$5,000 off the cost of building consents for strengthening work is an absolute joke, and the council needs to be doing far more if it wants progress to be made. These sorts of preliminary barriers should be removed altogether for strengthening work to incentivise work starting. 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? I feel there needs to be some sort of national governing body to oversee this whole strengthening

debacle, that takes into account all the considerable hurdles we owners are facing, and acting as an intermediary agency to assist us in all the layers involved. I'd really like to know how many private owner-occupiers are among all the property investors, and for there to be proper acknowledgement that people in my situation have no way of personally servicing the levels of debt required to fund this kind of strengthening ourselves. 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 workplan around this. There was talk of the council creating its own lending system for those of us who'll have no way of borrowing the required funds for the work, but the serviceability of this kind of debt will still be a problem even without interest for those in my situation. 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.

I represent the very human, home-owner face of those affected, which seems to have been overlooked in your pitch aimed at investors and commercial property owners. I'm glad you got to see my tears at the meeting which I hope gives you some perspective on the frightening situation that is being asked of people in my situation.

I am very happy to come in and speak in support of my submission, and am eager to work with the council to find a solution that works.

Nga mihi,

Elin Lloyd



Brooklyn, Wellington 6021.

From: [REDACTED]
To: [BUS: Policy Submission](#)
Subject: Earthquake Prone Priority Buildings
Date: Thursday, 22 November 2018 5:02:30 p.m.
Importance: High

- Do you agree with the proposed high traffic routes? Why?
 Yes, the proposal is a good ideal.
 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.
- Do you agree with the proposed emergency transport routes? Why?
 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. How about make a mandatory that in case of natural disaster, all public transport routes (plus roads & streets to/from hospitals) becomes emergency transport routes.
- Do you think we have been over-inclusive in some areas, or left out areas which should be included?
 Yes. Emergency transport routes should include all roads/street to/from all public & privates hospitals (or large medical centre) in Wellington city or region.
- How can the Council best support building owners to meet requirements for remediating their buildings?
 Building consent for earthquake strengthening works should be waived completely or nil rather than just subsidising, as building owners have to bear all financial burden of high strengthening costs and no income. If the council really wants to see all strengthening works done early and supporting owner then this is a top priority.

Also first and best the Council can support building owners are by returning their phone calls, to meet individual owners to re-exam their building(s) and detail explanation of the council assessment, as some don't appear to be earthquake-prone buildings ie. timber buildings vs. brick/concrete buildings. My timber building is one of many heritage building in Wellington and I have left so many messages for the Resilience team but nobody called me back so I gave up to contact the council. If the council really

- Is there anything else we need to take into account in setting these routes?
 The Council should also consider how many lanes available on each of those streets/roads by creating more lanes for traffic rather than reducing to single lane on some major roads/street around Wellington city for the sake of cycling lane, parking spaces, close in pedestrian crossing, monuments etc. Wellington already has too many narrow streets, which are filled up with parked cars. With a single lane road in some part of the city such as Oriental Parade, no emergency service can come & go easy in case of emergency during rush hours let alone a natural disaster situation. Has the council's street consultant ever considered emergency when redesigning the road?

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.

I am making this submission as an individual. Sorry for my late submission, as I have been working overseas for the past few months.

Kind regard

Vanessa Noble

From: [REDACTED]
 To: [BUS: Policy Submission](#)
 Subject: Yellow sticker
 Date: Friday, 23 November 2018 4:24:06 p.m.

SUBMISSION ON EARTHQUAKE RISK OF BUILDING
 IN [REDACTED], NEWTOWN, WELLINGTON 6021

The main thrust of this submission is in Part III and readers may scroll down there.
 Submission written by: S.Naguleswaran Owner [REDACTED], Wellington 6021
 Regarding the Yellow Sticker issued by WCC following the earthquake of 14 November 2016

PART I: PREAMBLE

Description of Building

7 levels / 4 units each floor, each unit about 60 sq m (Total 28 units).
 Reinforced concrete structure built late sixties. Construction details misplaced by WCC.
 No lifts. Two stairwells. Ramp from road level to 4th Floor
 The building was unit-titled recently. From July2018, WCC collects rates from each owner.

About the owner

Qualifications: BSc(Eng)(Hons) (Ceylon) (Mechanical Engineering) 1959
 The three years (9 terms) course was modelled on the then University of London

Syllabus.

Part I (5 terms general engineering) and
 Part II specialisation in Civil, Electrical or Mechanical Engineering.

PhD (Birm) (Oct 1963 – June 1967

Thesis title :Vibration of continuous systems with axially moving mass.

Work experience:

Lecturer University of Peradeniya, Sri Lanka (1967 – 1972)

Lecturer in Mechanical Engineering, University of Canterbury (1972 from.

Associate Professor in Mechanical Engineering, University of Canterbury (2008 retired.

Research: Vibration of continuous systems, stability.

Publications: Total 85 papers (82 one author) in refereed journal, conference papers.

Professional qualification: MIMechE (Lond) (not now)

The writer and family relocated to Christchurch in 1972. Over the years there were minor earthquakes.
The general view then was that the Christchurch soil will absorb earthquakes.

The writer experienced the two major Christchurch earthquakes. On both occasions the writer was wide awake. The damage to the two-level house was moderate. The damage to the concrete foundation was small. The plumbing, sewage and electrical system were almost intact. Roof and gutter system developed leaks. The stucco exterior had a few cracks mostly around the metal door frames. Some frames distorted. Floors creaked. Inside walls and ceilings cracked.

The garden had spots where signs of liquefaction were visible.

Later it turned out that the liquefaction of the soil contributed to the damage of most of the residential houses.

PART II: THE EXPERIENCE

The writer relocated to the above Wellington address after retirement. The writer was told that WCC had advised the Body Corp that seismic reinforcements to the building may be necessary. The advice was not based on any tests but probably on the 'fragile look' of the building. The writer was told that efforts to find any drawings proved futile.

Around midnight 13 November 2016 the writer, mobility impaired, was in the kitchen making a cup of tea. The earthquake struck very early 14 November. The jolts were heavier than the Christchurch jolts and felt different. The writer held the kitchen benches tight – thanks to the narrow spacing. Stay-put was the lesser risk. When the shake stopped, the writer expected to hear the damage to the building to continue but was surprised and comforted by the silence though a bit eerie. Looked out the window - the stairwell outside was intact and so was the ramp. It was midnight and other occupants were in bed and did not venture out. "All is well".

Next morning found the building had suffered only minor damage outside. Inside the ground floor apartment, small cracks on the ceiling corners were visible if one looked hard, the window frames appeared not to have distorted. To check the level, the writer opened the tap. The emptying was as good but the water was really gunky. The water tank on the seventh floor roof had literally been given a thorough wash by the earthquake!.

Over the next few days, news trickled in of damage suffered by similar but much newer buildings in Wellington – some beyond repairs. With the dust still around, the yellow sticker was introduced. I did provide some reassurance. A concept called percentage earthquake strong came into use.

PART III: LATERAL THOUGHTS

The writer wondered as to why the building [REDACTED] escaped much damage while much newer buildings did not. Were the design criteria different? Computers were not in vogue in late sixties. The design criterion was allowing a 'factor of safety' and building codes available at that time were in use. The writer remembers the undergraduate slide-rule design exercises on reinforced concrete, allowed liberal factor of safety. The steel were not very expensive.

It is possible the building [REDACTED] was such a design.

In the early sixties, the designer may do a non-destructive test. This may consist of mounting strain gauges at strategic points and setting off explosives to simulate impulse lateral and/or torsion loads. The results then used in future designs. The earthquake and aftershocks provided destructive tests for free! The building stood tall.

Modern buildings use computers extensively. Use of Finite Element Analysis is routine. Designers cut cost to the bones. Failures of modern buildings, bridges, roofs, dams etc. are not uncommon.

CONCLUSIONS

The building [REDACTED] is safe. If after seismic reinforcement it survives an earthquake it will be because it is inherently strong. The writer urges WCC to withdraw the yellow sticker.

NB: The meth contamination furore uncovered an excessively cautious approach prevailed.

Insurance Council of New Zealand
P.O. Box 474 Wellington 6140
Level 2, 139 The Terrace

Tel 64 4 472 5230
email icnz@icnz.org.nz
Fax 64 4 473 3011
www.icnz.org.nz

19 November 2018

Earthquake-prone priority buildings (259)
Wellington City Council
PO Box 2199
Wellington 6140

Emailed to: policy.submission@wcc.govt.nz

ICNZ submission on Earthquake-prone priority buildings consultation

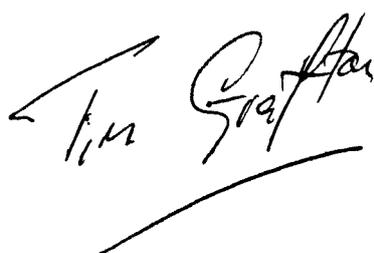
Thank you for the opportunity to submit on Earthquake-prone priority buildings, consultation to identify high traffic routes and emergency transport routes where earthquake-prone buildings may be a high risk. ICNZ represents general insurers that insure about 95 percent of the New Zealand general insurance market, including over half a trillion dollars' worth of New Zealand property and liabilities.

ICNZ has for some time been raising awareness on the need for a coordinated approach for better management of natural hazards so to keep the transfer of risk to insurance affordable and available for all New Zealanders long into the future. ICNZ therefore supports measures to improve the resilience of buildings, particularly in areas of higher earthquake risk. Improved resilience will assist response and recovery to a major earthquake event and potentially reduce the practical and economic impacts associated with cordons around buildings etc.

ICNZ has supported amendments to the *Building Act 2004* to give stronger emphasis to earthquake prone buildings and how they are managed, including the 2016 amendments that gave priority to buildings that are considered to pose a higher risk due to their construction type, use, or location. 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.

Thank you again for the opportunity to submit. If you have any questions, please contact our Regulatory Affairs Manager on [REDACTED] or by emailing [REDACTED]

Yours sincerely,



Tim Grafton
Chief Executive



Andrew Saunders
Regulatory Affairs Manager

From: Robert Davies [REDACTED]
Sent: Sunday, 25 November 2018 9:52 p.m.
To: BUS: Building Resilience
Subject: Re: Consultation on earthquake prone priority buildings 19th October-23rd November

This is a slightly late submission on your consultation on earthquake prone priority buildings from me and the Wilton Residents' Association. I emailed the residents' association email list and this submission is based on some of the ideas that I received plus some of my own.

Curtis Street/ Wilton Road between Churchill Drive and Chaytor Street possibly including Whitehead Road/Old Karori Road could be included in your emergency routes. 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.

I expected that you would have earthquake prone buildings that house a significant number of people either during the day or at night on your priority list - or have these already been dealt with?

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.

I can't really comment on whether the 7.5 years is the appropriate timescale - but it appears that this was set by government.

I think you could put extra priority on "any part of an unreinforced building that could fall from the building in an earthquake and fall onto a high traffic route" like the one photographed in your statement of proposal.

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.

Robert Davies

Wilton Residents' Association.

From: [REDACTED]
To: [BUS: Policy Submission](#)
Subject: PRIORITY EATHQUAKE-PRONE BUILDINGS
Date: Tuesday, 20 November 2018 8:04:03 p.m.

Hi thank you for your follow up letter.

We feel it is unfair that priority buildings need to be remediated within 7.5 years

My parents are both 82, they have worked hard there whole lives they own the house they live in and a small building in Tawa, how are these two old people meant to find the means to complete the work. I have had drawings drawn up and awaiting tenders now but there is no way they will afford the whole project it is not just the fact that they could just do the earthquake strengthening, you make them build new toilets, but in fire walls etc.etc. how are they getting helped by you the council or by the government, they are not, just more pressure put on to them. You have no idea how upsetting all this is for them and they dont need it at the age of 82.You are hurting the little ma and pa investors without any proper financial assistance.

Kind Regards

Sarantos Economou



Virus-free. www.avg.com

From: Carl Savage [REDACTED]
Sent: Monday, 19 November 2018 5:17 p.m.
To: Ken Bailey
Cc: Sophie Jerram; Perry Aspros; Sam Donald; Chris Wills; Guido Seevens; Dani Sanders; Dennis Montgomery; Katie Underwood
Subject: Re: Consultation on earthquake prone priority buildings 19th October-23rd November

Mr Bailey,

I have included other members of the Greater Brooklyn Residents Association Inc Exec in this email so I am not simply sounding off by myself here.

Thank you for your very thorough email. We appreciate it. We also appreciate you have a legal obligation to consult the public on this document and to generate discussion. Also, think we have a handle on the early email on seeking clarity on transport options. To our knowledge, there was only one building - now demolished and is a childcare facility - in Cleveland St that was yellow stickered and posed an earthquake risk.

Building risks

With the exception of the Penthouse cinema - which may or may not be an earthquake risk, we do not see any substantial buildings in our area posing any more of a risk than ordinary buildings being damaged / debris falling onto the road and causing traffic issues.

I also 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. However it is possible a landslip could. There are steep banks along it entering Charlotte Ave, so we do not minimise that potential risk, but that is more likely from a landslip not a building.

Most likely risks in a major earthquakes are more likely to be landslips than building collapses

In fact, 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 We see that potential for that to be:

- **Brooklyn building risks** - Cleveland St - most buildings are single or two story buildings set back from the street
 - although we acknowledge that 28 & 38 Cleveland St which are on the WCC EQ register of EQ Prone buildings and large buildings
- **Brooklyn risks** - various steep sections of Brooklyn Rd coming up the hill into Brooklyn
 - and noting the 4 level 2 Brooklyn Terrace at the Brooklyn Rd/Ohiro Rd is deemed EQ prone and a potential risk to come down in a massive EQ
- **Brooklyn risks** -Todman St - linking central Brooklyn to west Brooklyn (the elevated section)
- various points along Ohiro Rd - immediately past the traffic lights; further to the south of the Brooklyn shops
- **Brooklyn risks** -Mills Road by Gowrie St
- **Mornington / Kingston risks** -Farnham St - linking Brooklyn /Kingston/Mornington with Berhampore with several areas of that could be potentially landslip prone
- **Kingston risks** Quebec St, Kingston - linking Kingston/Mornington with Berhampore with several areas of that could be potentially landslip prone by the Kingston shops
- **Kingston risks** Halifax St, Kingston - linking Kingston/Mornington with Berhampore with several areas of that could be potentially landslip prone by the Kingston shops
- Cleveland St - most buildings are single or two story buildings set back from the street
 - although we acknowledge that 28 & 38 Cleveland St which are on the WCC EQ register of EQ Prone buildings and large buildings

Washington Ave & The Ridgeway & Cleveland St - Brooklyn to the south along the ridgeline to Kingston and down to Berhampore and the southern suburbs

may be affected by buildings damaged by earthquakes, but as many are timber, while potentially risky, we do not see it as a huge risk especially as only two buildings in the Brooklyn village are more than 2 levels high (and we acknowledge that they are 28 & 38 Cleveland St which are on the WCC EQ register of EQ Prone buildings) . A risk, but not one we would have thought would be huge.

The parallel road to from Brooklyn to Kingston to Berhampore would be along Mornington Road- leading out of Brooklyn to access southern suburbs via Berhampore

. The only earthquake prone building here is the old Vogelhorn Bowling Club at 93 Mornington Road and it would more likely collapse internally onto the old bowling green and not onto the road (Mornington Rd) itself.

We would see the main risk as being from landslips and rock fall blocking roading rather than buildings collapsing onto the road. Again, all this is subjective. If we had a Kaikoura type earthquake occur under Wellington, Wellington would effectively cease to exist.

You replied to this message on 16/11/2018 11:11 a.m..

From: John Perera [REDACTED]
To: BUS: Policy Submission
Cc:
Subject:

Sent: Fri 16/11/2018 10:20 a.m.

Submission for strengthening some earthquake prone building in seven 7.5 years

I tried to submit the on line submission but after having spent about one hour when I click submit it did not go.

Therefore my view on this matter and other earthquake issues are as follows.

I have not done my research and I am unable to comment on you selection of priority buildings. There may be many other buildings not in your list that may collapse and may I ask whether the Wellington Railway station is in your list of priority buildings. I have not seen it not being strengthened over the past forty years.

The Bank of New Zealand and Statistics Building, not far from Wellington Railway Station, are new and had 100 percent of the code. One hundred percent of the code did not mean much during the last earthquake. The Statistics Building was demolished almost immediately and the Bank of NZ is to be demolished. Yet the Wellington Railway Station built in 1936 has not collapsed or need demolishing. As you know many buildings that had over 75 percent of the code were cracked and have been demolished.

My point is, a high earthquake rating does not mean that the building will not collapse and block the main roads. In a sever earthquake, storm or tsunami roads will be blocked and some people will die. This is the real world!

I attended the meeting at Comfort Hotel In Cuba St a couple of weeks ago. One apartment owners who have no money to strengthen the building where she live was in tears. Many others including private residential landlords did not know where to find the money to strengthen as the values have dropped as a result of having to strengthen and the Banks will not lend on the security of the buildings. This is a very sad situation.

Most of these buildings in your list have stood the test of time. I mean one hundred years or more. They may stand for another hundred years without strengthening. Give them enough time or help with strengthening costs.

Even in fifteen years these rules are not likely to be enforced especially to owner occupiers in apartment blocks. If you do so there will be many people sleeping on the streets. People have no money to strengthen their buildings.

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.

John Perera

John Perera
[REDACTED]

Delete respond move tags x Printing Zoom Enterprise Connect

You forwarded this message on 15/11/2018 3:59 p.m.
From: roger morris [REDACTED] Sent: Wed 14/11/2018 11:13
To: BUS: Policy Submission
Cc:
Subject: 381 Adelaide Road.

Hayley.

Thank you for the reminder.

I submit "High Use" or "Emergency Route" earthquake strengthening processes, do **NOT** apply to Macalister Heights.

The structure is *well separate* from any route or high use that would interfere with critical first response in time of catastrophe.

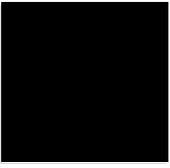
IF the engineers currently assessing the structural integrity of the building as part of our own process toward earthquake proofing determine the need to fast track, is another matter entirely.

Which, we as a group, are dealing with in accordance with normal CC guidelines.

So, *in answer to your question*, I would moot this **not a priority building** as described in your letter.

Thank You.

Roger Morris



-----Original Message-----

From: Andrew Cotterrell

Sent: Tuesday, 20 November 2018 4:24 PM

To: 'hayley.moselen@wcc.goct.nz' <hayley.moselen@wcc.goct.nz>

Cc: Jacquie Hill [REDACTED] Nick White
[REDACTED]

Subject: Molly Malones Building - 134 Courtenay Place, Wellington

Importance: High

ATTENTION: HAYLEY MOSELEN

Hi Hayley,

We have received your letter regarding the above building and the WCC's consultation regarding priority earthquake prone buildings.

Thank you for the opportunity to have 'our say' but we have nothing to offer and are happy to accept whatever policy the WCC ultimately decides is the best one for public safety in a seismic event.

I have assumed that the WCC considers 134 Courtney Place as a 'priority' earthquake prone building and the reason we have received your letter about the WCC consultation process on the subject.

I look forward to receiving your advice on the WCC's ultimate decision in due course.

Kind regards,
Andrew

Andrew Cotterrell
CEO & Legal Director

Cornerstone Partners Limited | Property Management & Consultancy
[REDACTED]

www.cornerstonepartners.co.nz

Submitter Details

First Name: **Sam**
 Last Name: **Bunglebob**
 Organisation: **Bunglebob Bungles Ltd**
 Street: [REDACTED]
 Suburb: **Wellington Central**
 City: **Wellington**
 Country: **New Zealand**
 PostCode: **6011**
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both
-

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

All affected buildings are a priority for gods sake. Typical council...it's all about being seen to do the right thing, rather than actually doing the right thing.

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

Yes. If there's any risk to the public at all then ALL situations have the same priority level!!

How can the Council best support building owners meet requirements for remediating their

buildings?

Comments

Is there anything else we need to take into account in setting these routes?

Comments

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Angelos**

Last Name: **Argus**

Organisation: **Athena Nominees Ltd and other property owning related entities**

Street:

Suburb:

City:

Country: **New Zealand**

Daytime Phone: [REDACTED]

Mobile: [REDACTED]

eMail: [REDACTED]

Wishes to be heard:

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

Submitter

Agent

Both

Submission

Questions about Earthquake-Prone Buildings

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

Yes

No

Why?

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? Do you think building owners have nothing better to do other than continuously attending to Council requests? Do you think building owners are made of unending funds to every so often having to incur additional expenses to meet these requirements??

Do you agree with the proposed emergency transport routes?

Yes

No

Why?

See above

Do you think we have been over-inclusive in some areas, or left out areas which should be

included?

Comments
see above

How can the Council best support building owners meet requirements for remediating their buildings?

Comments
Pay for all expenses and losses incurred in meeting the requirements of the Council

Is there anything else we need to take into account in setting these routes?

Comments
Yes, do not just act only as public servants without consideration of the impact of this upon your ratepayers, the building owners.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter DetailsFirst Name: **Chetan**Last Name: **Sukha**

Street: [REDACTED]

Suburb: **Lyllall Bay**City: **Wellington**Country: **New Zealand**PostCode: **6022**

Daytime Phone: [REDACTED]

Mobile: [REDACTED]

eMail: [REDACTED]

Wishes to be heard:

 Yes I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

 Submitter Agent Both**Submission****Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

 Yes No

Why?

No as Onepu Road has been set as a high traffic routes.

Do you agree with the proposed emergency transport routes?

 Yes No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

Over-inclusive

How can the Council best support building owners meet requirements for remediating their

buildings?

Comments

- 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. - Helping further with costs to remedy on the property - quick alternatives to remedy - Tax rebate

Is there anything else we need to take into account in setting these routes?

Comments

See above

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

From: Chetan Sukha [REDACTED]
To: BUS: Policy Submission
Cc: [REDACTED]
Subject: Earthquake-prone priority buildings

Sent: Wed 14/11/2018 3:20 p.m.

To whom it may concern,

My father Guntant Sukha of [REDACTED] has received two letters now indicating that there is a proposal to change the timeframes for specific earthquake-prone buildings.

Guntant (my father) has asked me to reply back on his behalf. We believe this proposal to change the date is unfair and far too late by the WCC. We have based rental agreements with tenants based on the original dates and to change now to earlier would have significant impact to both the tenant and us as the landlord (financial penalties for us).

We have also used the timeframe for budgetary purposes (obtain enough money to fix) so the new timeframes are therefore unfair and unacceptable in our opinion and we strongly object to this change!

I have also submitted an online submission but don't believe the form allows for this type of issues to be captured but more around the general proposal around the high traffic areas.... Again it seems WCC is trying to ignore the individual impact to building owners.

Therefore I would like both submissions be considered.

Any replies will need to be sent to both [REDACTED] and [REDACTED] - preferred contact is still postal so we can keep a record.

Thanks

Chetan Sukha
Business Analysis Lead

[REDACTED]

Submitter DetailsFirst Name: **Matthew**Last Name: **Wright**

Street: [REDACTED]

Suburb:

City: **Wellington**Country: **New Zealand**PostCode: **6149**

Mobile: [REDACTED]

eMail: [REDACTED]

Wishes to be heard:

 Yes I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

 Submitter Agent Both**Submission****Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

 Yes No

Why?

Because 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.

Do you agree with the proposed emergency transport routes?

 Yes No

Why?

Because 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.

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

Yes as 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

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

By providing free building & resource consents when required, and contributing towards costs the building owner incurs as a result of this legislation

Is there anything else we need to take into account in setting these routes?

Comments

Yes, 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.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter DetailsFirst Name: **Richard**Last Name: **JACKSON**Organisation: **None**

Street: [REDACTED]

Suburb: **Wellington**City: **Wellington**Country: **New Zealand**PostCode: **5016**

Daytime Phone: [REDACTED]

eMail: [REDACTED]

Wishes to be heard:

 Yes I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

 Submitter Agent Both**Submission****Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

 Yes No

Why?

More should be added.

Do you agree with the proposed emergency transport routes?

 Yes No

Why?

More should be added

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

You should cover as much of the city as possible with urgent remedial works to lower risk to human life

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

Fine them for not doing the work sooner, and use the funds to do the work on their behalf.

Is there anything else we need to take into account in setting these routes?

Comments

When you encourage 'pedestrian friendliness' in areas (like egmont st) you should add these areas to the covered routes.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Esther**

Last Name: **King**

Street: [REDACTED]

Suburb:

City: **Timaru**

Country: **New Zealand**

Mobile: [REDACTED]

eMail: [REDACTED]

Wishes to be heard:

Yes

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

Submitter

Agent

Both

Submission

Questions about Earthquake-Prone Buildings

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

Yes

No

Why?

Yes. We've experienced the ChCh earthquakes and know the intensity and immediacy of a huge earthquake under the city. Aa 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 similar to 2010 or 2011. 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.

Do you agree with the proposed emergency transport routes?

Yes

No

Why?

Yes. Hoping those near the coast and especially near the port survive a substantial localised earthquake.

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

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.

Is there anything else we need to take into account in setting these routes?

Comments

Work on the busiest pedestrian ones first eg Cuba St. Please also look at the verandahs - many look very unsafe and likely to come down. This should be an easier quicker job.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Laura**
 Last Name: **Newcombe**
 Organisation: **Four Seasons Florist**
 Street: [REDACTED]
 Suburb: **Newtown**
 City: **Wellington**
 Country: **New Zealand**
 PostCode: **6021**
 Daytime Phone: [REDACTED]
 eMail| [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

I don't think council should take a blanket approach when funding is so difficult to obtain in these current times.

How can the Council best support building owners meet requirements for remediating their

buildings?

Comments

I am a sole owner/occupier of a humble unit ([REDACTED] in Newtown). I operate a florist shop downstairs in my unit, and live upstairs. I am part of a body corporate of a heritage building that has been identified as being situated on a proposed high traffic emergency transport route. The body corporate has recently received a quote to strengthen the building from a Quantity Surveyor (this quote was received September 2018). My portion for all-inclusive remedial work will be in excess of \$400,000 just for my small unit. 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. 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. I am a single person who only owns this small unit (I own no other property) and I am self-employed on a very modest income. I am the only owner/occupier in my body corporate, as the other unit owners use their units for investment purposes. I have operated my small florist shop on [REDACTED] serving the community for almost 25 years. Being confronted with these costs and deadlines for strengthening has been incredibly overwhelming, and has caused me great anxiety. I have been proactive and diligent in saving towards strengthening, but the savings I have pale in comparison to the astronomically inflated prices quoted for this work. It is imperative for the Council to look at individual circumstances in relation to any financial assistance that can be offered for earthquake strengthening. There will be some building owners who have no financial barriers, but others like myself will face massive struggles and may not even be financially able to complete the work without Council/Government assistance. I have been hit particularly hard in this matter. As mentioned, I am a small business owner who works and lives in my humble unit on [REDACTED] and not only do I need to come up with the very high costs associated with strengthening work, on top of this, I will also have to rent both commercial and residential premises whilst seismic work is undertaken on my unit (a minimum of a 1 year time frame). 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. 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.

Is there anything else we need to take into account in setting these routes?

Comments

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Hugh**
 Last Name: **McGuire**
 Street: [REDACTED]
 Suburb: **Mount Cook**
 City: **Wellington**
 Country: **New Zealand**
 PostCode: **6021**
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both

Submission

Questions about Earthquake-Prone Buildings

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

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.

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

I'd support highways, motorways and arterial roads for emergency transport routes. Despite that'll clog, the Transmission Gully should open in 18 months time roughly.

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

It would depend on how many people are coordinated when they're evacuated.

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

I support their policy of raising building standards towards a deadline because it has been pretty successful no matter how they try and do. Some buildings are going ahead with strengthening, some of them are completed, but some are still trying to decide whether they'll strengthen, demolish, reconstruct or sell them. Wellington housing market is overheating, and more homes are needed with some of them on their way and some of them completed. Wellington must tackle housing issues before making convenient for owners to make sensible and wise decision.

Is there anything else we need to take into account in setting these routes?

Comments

Bus companies would provide double deckers to serve as many people as well as using cars including where the number 1 bus travels.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **George**
 Last Name: **Kanelos**
 Street: [REDACTED]
 Suburb: **Brooklyn**
 City: **Wellington**
 Country: **New Zealand**
 PostCode: **6021**
 Mobile: [REDACTED]
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both
-

Submission

Questions about Earthquake-Prone Buildings

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

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.

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

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.

How can the Council best support building owners meet requirements for remediating their

buildings?

Comments

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 of: 1) First and foremost hospitals, schools, public buildings; 2) Followed by the remaining ~333 buildings? Further, how will the further ~300 buildings identified that are not Priority Buildings, complete their programmes of work over con-current timelines? My experience through the URM process (even though we are not URM) is that our engineer has been unable to complete any works for us as he was 'too busy working on his URM clients'. We have been waiting on his report since August 2017 (when engaged) and are unlikely to see anything until the beginning of next year (i.e 2019). This is an unacceptable wait for the buildings and their owners that are on the final ~300 list that can't get a leg in because of all the con-current activity ongoing. I hear this issue is across the spectrum and when you're a small BC like us, we really are at the bottom of the heap in identifying and attracting advisors, let alone construction companies, etc. as our project will progress. 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. As a member of BC of a block of residential apartments, 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. 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 resilient city to live in. You can't pick to help some owners and caste others aside. Start thinking broader and better understanding ALL your customers (i.e. rate-payers).

Is there anything else we need to take into account in setting these routes?

Comments

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Barry**
 Last Name: **McEwen**
 Organisation: **BLM Construction Ktd**
 Street:
 Suburb: **Plimmerton**
 City: **Porirua**
 Country: **New Zealand**
 PostCode: **5026**
 Daytime Phone: **[REDACTED]**
 Mobile: **[REDACTED]**
 eMail: **[REDACTED]**

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments
 no

How can the Council best support building owners meet requirements for remediating their

buildings?

Comments
Free consents & permits

Is there anything else we need to take into account in setting these routes?

Comments
no

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter DetailsFirst Name: **John**Last Name: **Gill**

Street: [REDACTED]

Suburb: **Hataitai**City: **Wellington**Country: **New Zealand**PostCode: **6021**

Daytime Phone: [REDACTED]

eMail: [REDACTED]

Wishes to be heard:

 Yes I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

 Submitter Agent Both**Submission****Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

 Yes No

Why?

Do you agree with the proposed emergency transport routes?

 Yes No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

The building owners should get a mortgage to pay for the improvement and if they don't then the building should be closed.

Is there anything else we need to take into account in setting these routes?

Comments

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter DetailsFirst Name: **Janet**Last Name: **Hughes**

Street: [REDACTED]

Suburb: **Karori**City: **Wellington**Country: **New Zealand**PostCode: **6012**

Daytime Phone: [REDACTED]

Mobile: [REDACTED]

eMail: [REDACTED]

Wishes to be heard:

 Yes I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

 Submitter Agent Both**Submission****Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

 Yes No

Why?

Do you agree with the proposed emergency transport routes?

 Yes No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

Is there anything else we need to take into account in setting these routes?

Comments

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.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter DetailsFirst Name: **Don**Last Name: **Maclean**

Street: [REDACTED]

Suburb: **Brooklyn**City: **Wellington**Country: **New Zealand**PostCode: **6021**

Daytime Phone: [REDACTED]

Mobile: [REDACTED]

eMail: [REDACTED]

Wishes to be heard:

 Yes I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

 Submitter Agent Both**Submission****Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

 Yes No

Why?

Underlying reasoning on choosing high traffic routes appears to be sound in my opinion.

Do you agree with the proposed emergency transport routes?

 Yes No

Why?

Underlying reasoning on choosing high traffic routes appears to be sound in my opinion.

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

No.

How can the Council best support building owners meet requirements for remediating their

buildings?

Comments

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. A lot of building owners have paid 'market' rates for property's that met earthquake standards at the time. To arbitrarily change the standard and expect people to be able to come up with 100's of thousands of dollars to 'remediate' a building that has already withstood many 'moderate' earthquakes is unreasonable. People on fixed incomes (or wages) will be unable to fund such work. The costs are already escalating for building, material and compliance. 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. As rate payers are already paying for the remediation of public buildings (i.e. council buildings), that set's a precedent to include funding for remedial work on other building owners property's caught up in the same situation. Otherwise it is simply not affordable. Financial assistance along with some sort of overall management of resources and materials is imperative to the effective resolution of remediation requirements.

Is there anything else we need to take into account in setting these routes?

Comments

Maybe staged timeframes for remediation to allow realistic management of limited resources and manpower to achieve the desired outcomes.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Johnny**
 Last Name: **Scott**
 Street: **[REDACTED]**
 Suburb: **Thorndon**
 City: **Thorndon**
 Country: **New Zealand**
 PostCode: **6011**
 Daytime Phone: **[REDACTED]**
 eMail: **[REDACTED]**

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both
-

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

Is there anything else we need to take into account in setting these routes?

Comments

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.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Sophie**
 Last Name: **Warren**
 Street: [REDACTED]
 Suburb: **Wellington**
 City: **Wellington**
 Country: **New Zealand**
 PostCode: **6012**
 Daytime Phone: [REDACTED]
 Mobile: [REDACTED]
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both
-

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments
 No

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

Is there anything else we need to take into account in setting these routes?

Comments

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter DetailsFirst Name: **Richard**Last Name: **Arlidge**Organisation: **N/A**

Street: [REDACTED]

Suburb: **Hutt Central**City: **Lower Hutt**Country: **New Zealand**PostCode: **5011**

Daytime Phone: [REDACTED]

Mobile: [REDACTED]

eMail: [REDACTED]

Wishes to be heard:

 Yes I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

 Submitter Agent Both**Submission****Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

 Yes No

Why?

They appear sensible

Do you agree with the proposed emergency transport routes?

 Yes No

Why?

They appear sensible

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

No comment

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

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.

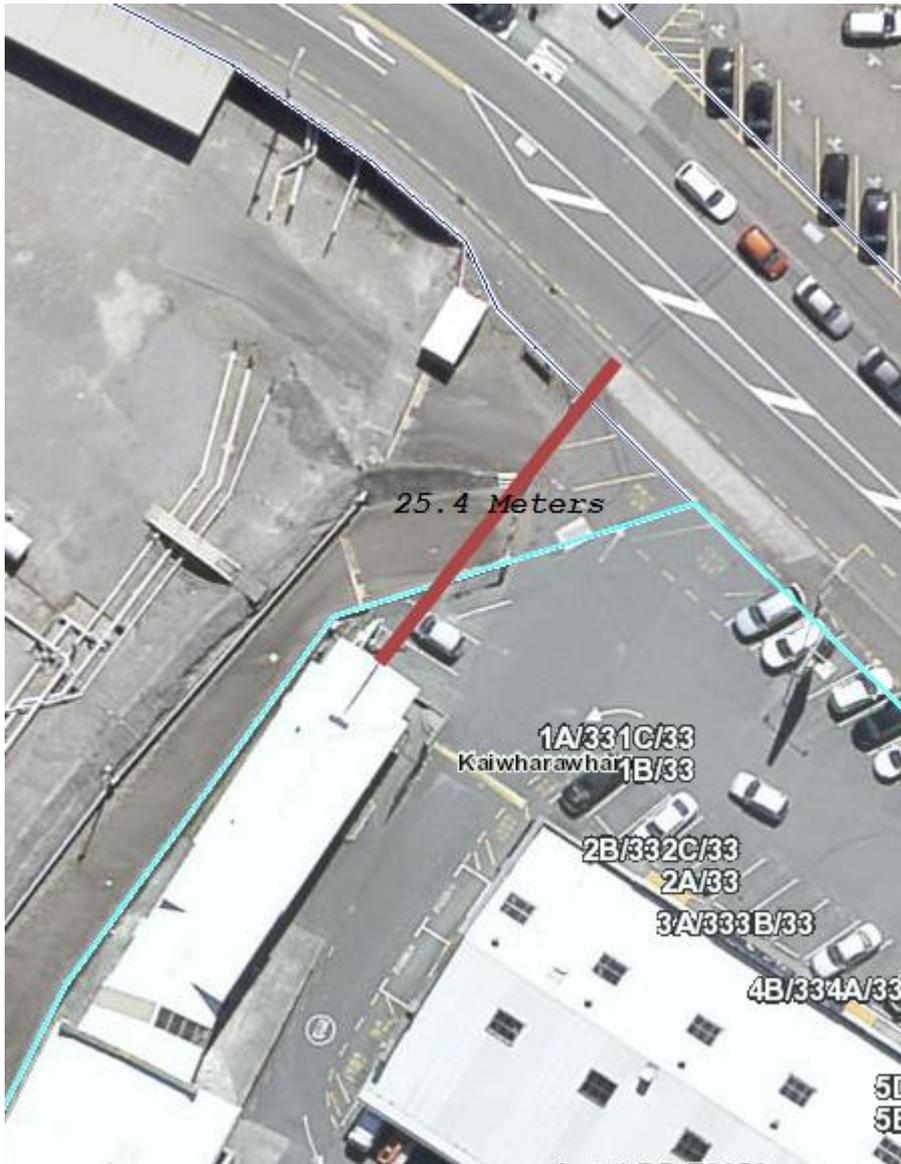
Is there anything else we need to take into account in setting these routes?

Comments

Overall the intentions seem appropriate, but I do sincerely hope that a modicum of sense prevails and that this does not become a blanket 'no exceptions' policy. For example, my mother's property consists of a small 40-odd square metre single-storey shop fronting Kaiwharwhara Road, being the front end of a longer building. It is deemed an EPB because it is predominantly cavity brick construction. The majority of the facade fronting Kaiwharwhara Road is actually clad in corrugated colorsteel, as is the fully sarked roof - so no risk of sliding/falling roof tiles etc. 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 commonsense 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?

Attached Documents

| File |
|-------------------------------------|
| Aerial |
| Earthquake-Prone Priority Buildings |



The above has been extracted from your website. The incorrect spelling of 'metres' is down (I'm picking) to the "American" creator of the site?

Submitter Details

First Name: **Geoffrey**
 Last Name: **Lee**
 Organisation: **Lee & Associates**
 Street: [REDACTED]
 Suburb: **WELLINGTON**
 City: **WELLINGTON**
 Country: **New Zealand**
 PostCode: **6012**
 Daytime Phone: [REDACTED]
 Mobile: [REDACTED]
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

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

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

Yes, Karori has many other high traffic volume feeders to Karori Rd - Birdwood Rd for example I live just off Messines Rd - it is not high volume

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

We agree with the concept of promptly remediating buildings that have unreinforced masonry which may fall onto priority traffic routes. 168 Karori Rd - Bldg A - St Mary's Anglican Church occupies the site on the corner of Fancourt St. It is a listed Heritage building and is earthquake prone. It's Tower has been strengthened and it is on Fancourt St. The building is set back from both Fancourt St and Karori Rd. In the St Mary's Church situation we do not believe that Fancourt St is a high volume route or that St Mary's Church has unreinforced masonry. Next door to St Mary's Church is 168 Karori Rd Bldg B - Parish Hall - this is well set back from Karori Rd. Karori Rd is a high volume route. We do not consider the Parish Hall has unreinforced masonry that will fall onto Karori Rd. What would help is an assessment of the risk to Karori Rd posed by these buildings. The key support needed in the case of remediation being required is a strategic approach to removing the risks presented rather than a fix the whole building. 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 traffic routes would be welcomed. That is set up a fund to support the cost of repairs.

Is there anything else we need to take into account in setting these routes?

Comments

We believe the alternative routes available and the likelihood them becoming affected by damaged buildings needs to be considered.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Rachel**
 Last Name: **Law**
 Street: **PO Box 11601, Manners Street**
 Suburb: **Te Aro**
 City: **Wellington**
 Country: **New Zealand**
 PostCode: **6142**
 Daytime Phone: [REDACTED]
 Mobile: [REDACTED]
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

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.

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

How can the Council best support building owners meet requirements for remediating their

buildings?

Comments

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.

Is there anything else we need to take into account in setting these routes?

Comments

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Mo**
 Last Name: **Greig**
 Street: **[REDACTED]**
 Suburb:
 City: **London**
 Country: **United Kingdom**
 PostCode: **W2 1NS**
 Mobile: **[REDACTED]**
 eMail: **[REDACTED]**

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both
-

Submission

Questions about Earthquake-Prone Buildings

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

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.

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

I am assuming the sections of roads in Newtown and Mt Cook are routes to access the hospital. In which case they seem reasonable.

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

I can't comment on areas outside of Newtown and Berhampore

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

1. 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. 2. Financial support. 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. In 2018 I have already spent around \$50k on strengthening work already. Small property owners like myself do not have unlimited funds available to meet government and councils increasing demands.

Is there anything else we need to take into account in setting these routes?

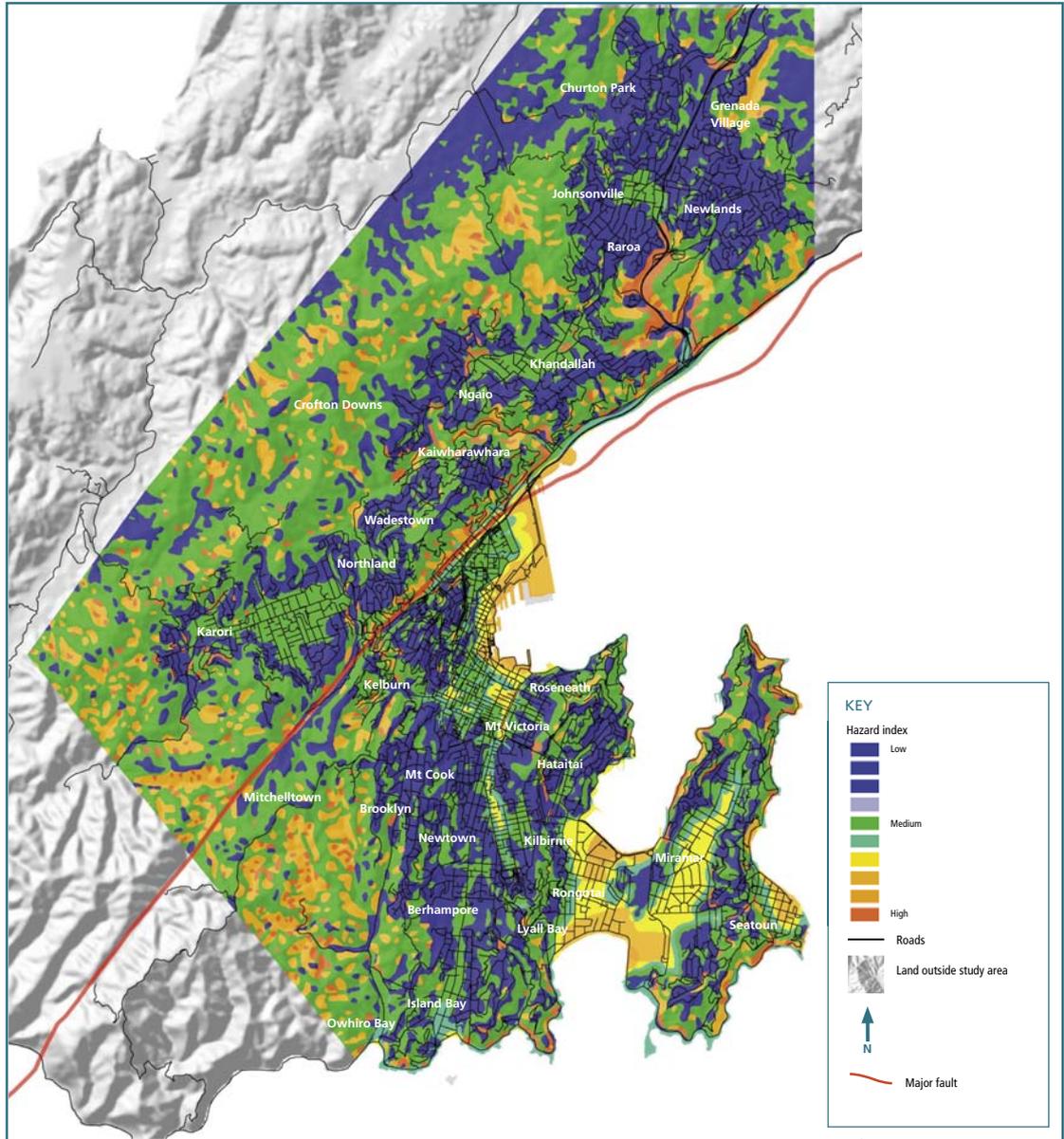
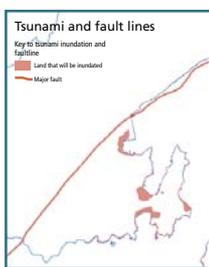
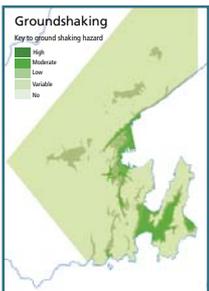
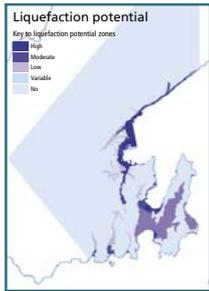
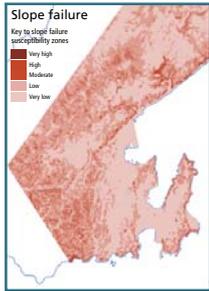
Comments

Our building at [REDACTED] Berhampore is in a low risk area (see map attached) And as I said earlier I have just completed a significant amount of work on the building. In all of the recent earthquakes in Wellington there was no impact to our building or those surrounding it. So while the route may be considered high traffic I do not consider the building to be high risk.

Attached Documents

| File |
|---|
| combined_earthquake_hazard_map_wellington |
| Earthquake-Prone Priority Buildings |

Combined earthquake hazard map Wellington City



| Earthquake Hazard Mitigation Measures | | | | |
|---------------------------------------|--|---|---|---|
| Hazard | Effect on ground | Effect on facilities | Mitigation options: existing facilities | Mitigation options: planned facilities |
| Fault movement | Ground disturbances vertically and horizontally over a zone depends on depth to rock below surface. Cracks in land surface. | Uphewal, tearing apart, movement of foundations, severe damage to structures which cross the fault. | <ol style="list-style-type: none"> 1. Verify. 2. Assess impact. 3. Options: <ol style="list-style-type: none"> a) strengthen to survive b) move facilities from fault zone c) limit damage by providing weak links or isolation | <ol style="list-style-type: none"> 1. Verify. 2. Assess impact. 3. Options: <ol style="list-style-type: none"> a) construct facilities elsewhere b) incorporate special strengthening c) provide weak links or special isolation to limit damage |
| Ground shaking | Violent horizontal and vertical motions for up to one minute duration. | Cracking, fracture, collapse of buildings. Breaks in underground services. Deformation of surface infrastructure. | <ol style="list-style-type: none"> 1. Verify. 2. Assess impact. 3. Options: <ol style="list-style-type: none"> a) strengthen or base isolate b) secure/improve vulnerable parts c) limit damage by providing weak links or isolation | <ol style="list-style-type: none"> 1. Verify. 2. Assess impact. 3. Options: <ol style="list-style-type: none"> a) comply with current codes for design and construction b) incorporate strength and resilience c) secure vulnerable parts and contents |
| Liquefaction | Shaking causes some soils to behave like liquid, causing loss of support to structures above. Such soils may be up to 10m below ground surface. Lateral movement of large soil masses, especially adjacent to rivers. Variable subsidence of ground surface. | Sinking and tilting of structures supported on liquefied material. Severe damage to underground services. Floation of empty underground tanks and chambers. | <ol style="list-style-type: none"> 1. Verify. 2. Assess impact. 3. Options: <ol style="list-style-type: none"> a) install piles b) install gravel drains c) drain liquefiable layers d) prepare for quick reinstatement | <ol style="list-style-type: none"> 1. Verify. 2. Assess impact. 3. Options: <ol style="list-style-type: none"> a) compact ground at site b) install pile and gravel drains c) drain liquefiable layers |
| Slope failure | A significant soil masses moves bodily down the slope, from few hundred millimetres to many metres. Landslides occur at many different locations. | Ranges from deformation of foundations and structural failures to total destruction of site and all buildings and infrastructure above and below ground. | <ol style="list-style-type: none"> 1. Verify. 2. Assess impact. 3. Options: <ol style="list-style-type: none"> a) stabilise slope – retaining walls b) stabilise slope – ground anchors c) improve drainage, reduce erosion | <ol style="list-style-type: none"> 1. Verify. 2. Assess impact. 3. Options: <ol style="list-style-type: none"> a) find a better site b) stabilise slope retaining walls c) stabilise slope – ground anchors d) improve drainage, reduce erosion |
| Tsunami | Land flooded. Scouring action erodes soil dramatically | Flooding of basements. Undermining/ destruction of surface infrastructure. Exposure/ damage to underground services. Undermining of foundations. Bodily movement of some structures, equipment, vehicles etc. | <ol style="list-style-type: none"> 1. Verify. 2. Assess impact. 3. Options: <ol style="list-style-type: none"> a) construct protective sea walls b) shift critical facilities to higher level | <ol style="list-style-type: none"> 1. Verify. 2. Assess impact. 3. Options: <ol style="list-style-type: none"> a) find a better site b) construct protective sea walls c) design special foundations / dikes d) put critical facilities at high level |

Background statement

In recognition of the earthquake hazard in the Region, the Greater Wellington Regional Council has carried out studies on ground surface rupture from active faulting, ground shaking, liquefaction potential and associated ground damage, slope failure and tsunami inundation (Wellington Harbour). Single factor hazard maps have been produced by Greater Wellington for each of these earthquake hazards.

This map series was prepared for Greater Wellington by Ian R. Brown Associates Ltd in association with Kingston Morrison Ltd and Victoria University of Wellington.

Warning

The hazard assessment methodologies developed for each of the earthquake hazard components and the methodology used to combine and present the hazard information impose certain qualifications and limitations on the use of the information. Details on the qualifications and limitations, and assessment methodologies of the component earthquake hazard studies are available from Greater Wellington. The methodology used to combine the various earthquake hazards are described in the Greater Wellington Report on Mapping Methodology and Risk Mitigation Measures WRC/ RP-T-96/22.

The information provided on these maps cannot be substituted for a site specific investigation. The site specific potential for and consequent damage from active faulting, amplified ground shaking, liquefaction, slope failure, and tsunami inundation should be assessed by qualified and experienced practitioners.

Bibliographic reference

Greater Wellington Regional Council (1996). Sheet 1 Wellington (1° ed.) Combined Earthquake Hazard Map 1:30000, Pub. No. WRC/ RP-T-96/13 Greater Wellington Regional Council, Wellington, New Zealand.

Notes on earthquake hazard mitigation measures

1. Check that the broad indication of hazard from the maps is correct for a particular site. (In many cases, this could prove cost-effective towards mitigation.)
2. Obtain professional advice on implications and available countermeasures.
3. Mitigation options shown are in brief general terms. Professional advice will be needed to account for particular circumstances at the site.

Single component hazard maps

These combine to produce the Combined Earthquake Hazard Maps. Maps of the single components (ground shaking, liquefaction and earthquake induced slope failure) are available from the Hazard Analyst at Greater Wellington.

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Submitter DetailsFirst Name: **Shane**Last Name: **Joyce**

Street: [REDACTED]

Suburb: **Mount Victoria**City: **Wellington**Country: **New Zealand**PostCode: **6011**

Daytime Phone: [REDACTED]

Mobile: [REDACTED]

eMail: [REDACTED]

Wishes to be heard:

 Yes I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

 Submitter Agent Both**Submission****Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

 Yes No

Why?

Do you agree with the proposed emergency transport routes?

 Yes No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

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. The traffic management and redtape involved for such nearly land locked buildings makes upgrades prohibitive. 100

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

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. Our engineers have been refused access to his apartment to start any detailed assessments. We need help from local and central governments for such situations to ensure the building can be upgraded without wasting further costs litigating rather than doing the work.

Is there anything else we need to take into account in setting these routes?

Comments

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Tomas**
 Last Name: **Kriha**
 Street: [REDACTED]
 Suburb: **Brooklyn**
 City: **Wellington**
 Country: **New Zealand**
 PostCode: **6021**
 Mobile: [REDACTED]
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

I assume you have good data and information from emergency services, although on the face of it a surprisingly small proportion of high traffic routes are also emergency transport routes. I would have expected more overlap.

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

How can the Council best support building owners meet requirements for remediating their

buildings?

Comments

Information and advice and being as helpful as possible with any compliance. If there's a conflict between heritage and safety we should err on the side of safety.

Is there anything else we need to take into account in setting these routes?

Comments

We should ensure safe routes for the public to evacuate (from CBD to home; from the city out) on bike or foot. It would make sense for as many of these routes as possible to have good walking and biking infrastructure as they're already high traffic and likely to also serve as public thoroughfares in an emergency.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter DetailsFirst Name: **Eric and Betty**Last Name: **Cornick**

Street: [REDACTED]

Suburb: **Raumati Beach**City: **Paraparaumu**Country: **New Zealand**PostCode: **5032**

Daytime Phone: [REDACTED]

Mobile: [REDACTED]

eMail: [REDACTED]

Wishes to be heard:

 Yes I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

 Submitter Agent Both**Submission****Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

 Yes No

Why?

Do you agree with the proposed emergency transport routes?

 Yes No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

No

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

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 to cause us significant hardship and stress!

Is there anything else we need to take into account in setting these routes?

Comments

Communication! Lots of it with affected parties.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Jean**
 Last Name: **Ellis**
 Street: **PO Box 24347, Manners Street**
 Suburb:
 City: **Wellington**
 Country: **New Zealand**
 PostCode: **6142**
 Daytime Phone: [REDACTED]
 Mobile: [REDACTED]
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

Included are some small streets and lanes that can not 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. I believe this illogical labeling has come about because of blending the previous Earthquake prone plan with the new priorities set by central government. The old Earthquake prone plan should have been revisited rather than blended to give more logical priorities.

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

This seems to have been well researched and I could see no problem with this part of the plan.

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

Drawing a line around the CBD seems to have been a lazy way out and included small streets and lanes. When I lived in Kelburn, Upland Road was so much busier than Egmont Street where I currently live. This is illogical see above. Now our buildings in Egmont street have had the unreinforced masonry (URM) completed so there is theoretically no danger to the passing pedestrians or the occasional car, the council should be concentrating on the buildings in the 'genuine' high traffic and emergency transport routes, and allowing buildings in small streets and lanes more time to complete our earthquake strengthening. After the last big earthquake of November 2016 there was NO damage to our building, so as a resident I feel much safer in our building than many others which are theoretically not earthquake prone. If its stood nearly 100 years of earthquakes then that feels better to me than some more modern buildings which looked bad after the November 2016.

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

Lender of the last resort Change deadlines to suit more logical priorities

Is there anything else we need to take into account in setting these routes?

Comments

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **nick**
 Last Name: **pinfold**
 Street: [REDACTED]
 Suburb: **Churton Park**
 City: **Wellington**
 Country: **New Zealand**
 PostCode: **6037**
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both
-

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

Your cordon counts are being used to get incorrect result. How can small dead end streets such 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.

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

Limited to Arterial Routes

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

How can small dead end streets such as Boston Terrace, Palmer street to name a few on the list

have high traffic counts.

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

Increase the heritage fund, provide technical resource.

Is there anything else we need to take into account in setting these routes?

Comments

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.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Clifford**
 Last Name: **Macdonald**
 Organisation: **The MPI Trust**
 Street: **PO Box 50-156**
 Suburb: **Porirua**
 City: **Porirua**
 Country: **New Zealand**
 PostCode: **5240**
 Daytime Phone: **[REDACTED]**
 Mobile: **[REDACTED]**
 eMail: **[REDACTED]**

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both
-

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

Should be reduced

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

Should be reduced

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

Yes

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

It is almost impossible to put up a financial argument to the banks to fund the strengthening of City Fringe buildings. Generally the buildings are of a design layout that is not desirable to tenants in the modern world of business working environment. After strengthening these buildings in my opinion will not command a significantly higher rental rate per m2 than currently achievable . Banks will struggle to justify a loan for strengthening purposes. Also of note is the fact that we are entering and era of tightening lending conditions for anybody exposed to commercial or residential property investment. I feel owners will have no option but to demolish a large proportion of the older Wellington commercial building landscape. 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.

Is there anything else we need to take into account in setting these routes?

Comments

Routes must be minimized to get a level of access acceptable with consideration to the financial impact on building owners of 'maybe would be a good idea routes'

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **liam**
 Last Name: **Macdonald**
 Street: [REDACTED]
 Suburb: **Elsdon**
 City: **Porirua**
 Country: **New Zealand**
 PostCode: **5022**
 Mobile: [REDACTED]
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both
-

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

Is there anything else we need to take into account in setting these routes?

Comments

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Rhys**
 Last Name: **Macdonald**
 Street: **[REDACTED]**
 Suburb: **Elsdon**
 City: **Porirua**
 Country: **New Zealand**
 PostCode: **5022**
 Mobile: **[REDACTED]**
 eMail: **[REDACTED]**

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both
-

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

Is there anything else we need to take into account in setting these routes?

Comments

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter DetailsFirst Name: **Vivienne**Last Name: **Tovey**

Street: [REDACTED]

Suburb: **Titahi Bay**City: **Porirua**Country: **New Zealand**PostCode: **5022**

Mobile: [REDACTED]

eMail: [REDACTED]

Wishes to be heard:

 Yes I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

 Submitter Agent Both**Submission****Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

 Yes No

Why?

Do you agree with the proposed emergency transport routes?

 Yes No

Why?

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

Yes

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

Long term low interest loans

Is there anything else we need to take into account in setting these routes?

Comments

Minimize to reduce financial impact on as few building owners as possible

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **James**
 Last Name: **Kennelly**
 Organisation: **Property Council New Zealand**
 Street: **PO Box 1033**
 Suburb:
 City: **Auckland**
 Country: **New Zealand**
 PostCode: **1140**
 Mobile: [REDACTED]
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both
-

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

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. We call on the Council to identify all the earthquake prone priority buildings and consult with affected building owners directly before any final decision is made. We feel that identifying which buildings will become priority buildings after the fact will give affected building owners no advanced warning or ability to respond to the consultation.

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

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.

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

We believe the Council has taken a fair and targeted approach to the areas identified.

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

We will further consult with our members and provide feedback accordingly.

Is there anything else we need to take into account in setting these routes?

Comments

We ask that the Council considers the need to protect damage to critical infrastructure for example access to water (including firefighting water sources), sewage, power and telecommunications. 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.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |

Submitter Details

First Name: **Wendy**
 Last Name: **Booth**
 Organisation: **Tasman Garden Apartments Body Corporate 82297**
 Street: [REDACTED]
 Suburb: **Mount Cook**
 City: **Wellington**
 Country: **New Zealand**
 PostCode: **6021**
 Daytime Phone: [REDACTED]
 Mobile: [REDACTED]
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both
-

Submission**Questions about Earthquake-Prone Buildings**

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

Lack of clarity on where Buckle Street is now, given the alteration of streets post Arras Tunnel and installation of footpath

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

As above

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

Provide guidance on likelihood of obtaining resource consents for site intensification (for redevelopment to subsidise costs) and support a process that enables Body Corporate's to borrow the substantial funds required to redevelop and/or strengthen

Is there anything else we need to take into account in setting these routes?

Comments

Please refer to our attached submission document: Submission to WCC on Priority EQP Buildings Consultation

Attached Documents

| File |
|--|
| Submission to WCC on Priority EQP Buildings Consultation |
| Earthquake-Prone Priority Buildings |

Submission to WCC on Priority EQP Buildings Consultation

23 November 2018

Representatives of the Tasman Garden Body Corporate Committee (BC 82297), 1 Tasman Street, Wellington met with officers of the WCC Building Resilience team on 21 November 2018. The purpose of the meeting was to determine whether Tasman Gardens (TG) is captured by the criteria determining whether a building is likely to be on the list of priority EQP buildings and so be required to be either strengthened to a minimum of 34% NBS or demolished within 7½ years of the determination of the list, which is expected to be finalized by 31 December 2019.

The criteria for TG being included on the list are:

- 1. Legislation – TG Buildings B and C are not subject to this specifically
- 2. Unreinforced masonry on a high priority traffic route – TG Buildings B and C are not constructed from unreinforced masonry
- 3. Building abuts an emergency traffic route (ETR) and due to the building height (fall zone is closer than 1½ times the height of the building) would be deemed to impede traffic

This submission addresses the third criteria.

The consultation document states that Buckle Street is an emergency route. Council officers were not clear, since the construction of the Arras Tunnel and realignment of SH1, whether Buckle Street is the footpath immediately north of TG, or the realigned SH1. This impacts on the potential fall zone for Building C. Building B does not abut Buckle Street, so is not an issue. Clarification is sought on what route is considered to be the emergency route. Note that consultation material indicates that tunnels are excluded from ETRs, so the Arras Tunnel and the road leading into it should not be designated an ETR.

Further clarification is sought on whether there are any factors other than the actual fall of an Earthquake Prone Building onto an ETR that would be deemed to impede emergency transport along an ETR? e.g. the risk that emergency services need to occupy the ETR to attempt to rescue people trapped within a damaged earthquake prone building that has not collapsed onto the ETR.

Also, TG has a report on Building C from our structural engineer, Silvester Clark, previously supplied to the WCC Building Resilience team. The TG Body Corporate Committee understand from that report that the structural weakness associated with Building C (static sheer walls at the north and south ends of the building with a long floorplate) would likely result in the building caving in rather than the sheer wall at the north end falling into the footpath/SH1 routes. Note that the structure of Building C was not compromised in the November 2016 Kaikoura earthquake.

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.

TG does not consider that any buildings in the complex meets the criteria for a priority EQP building.

Yours sincerely,

Tasman Garden Body Corporate Committee

Submitter Details

First Name: **Ash**
 Last Name: **McCrone**
 Street: [REDACTED]
 Suburb: **Wellington**
 City: **Wellington**
 Country: **New Zealand**
 PostCode: **6021**
 Daytime Phone: [REDACTED]
 eMail: [REDACTED]

Wishes to be heard:

- Yes
 I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Correspondence to:

- Submitter
 Agent
 Both

Submission

Questions about Earthquake-Prone Buildings

Identifying high traffic routes and emergency transport routes.

Do you agree with the proposed high traffic routes?

- Yes
 No

Why?

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. Has the Council modeled the impact of this policy? e.g. how many EPB buildings and individual home owners/building owners will be affected; what is the estimated cost of the policy (private & public); do all the buildings pose the same risk to egress along the emergency and priority roads? The proposed routes look OK. However, I do not agree that all EPB along these routes should have the time period for remediation reduced. Will buildings along the priority routes similar to the buildings that 'failed' in the Kaikoura 2016 earthquake be assessed and required to be remediated within 7.5 yrs of notice?

Do you agree with the proposed emergency transport routes?

- Yes
 No

Why?

The proposed routes look OK. See above comments.

Do you think we have been over-inclusive in some areas, or left out areas which should be included?

Comments

Why is Oriental Parade not connected to Evans Bay & CBD on the maps?

How can the Council best support building owners meet requirements for remediating their buildings?

Comments

It is clear that improving the resilience of our cities is prudent, it is also clear that earthquake strengthening is very complex and expensive. 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. Indeed, 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. Costs many owners are facing for seismic strengthening work show that the available 'support' is completely insignificant compared to the actual costs of strengthening. Currently individuals are being required to privately fund expensive mandatory seismic strengthening works for a public good. There are significant costs associated with remediating buildings. Some current cases are demonstrating that strengthening is not fiscally viable or rational. I own an apartment (which obviously complied with all the building regulations and requirements at the time I bought), in an EPB along one of the proposed priority access routes. We have been advised that owners would have to pay over \$700,000 each to strengthen. 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. 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. 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. I think the number of individuals affected by the EPB legislation has been hugely underestimated. 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 with 195 residential and 70 have BCs. Without accurate data, how can the Council, or Government, determine the impact of this policy. How many EPB are along the proposed high traffic and proposed emergency transport routes? 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)? The issues facing numerous home owners residing in buildings deemed earthquake-prone are very complex, in many cases financially crippling, and there is limited national guidance or support. We are private home owners, not developers. Other issues that need to be considered and solutions sought for include: Will the required NBS change in the near to medium future - thus potentially catching out owners/BCs that only went to 34% NBS (or even perhaps 67% NBS)? Can the Council/Government assure that the building code will not change? Even if owners were willing to pay the price of strengthening will they be able to raise loans to fund the strengthening works? Would banks lend money to

individuals that plan to strengthen to the lower 34% NBS rating? What is/will be the NBS level banks require? Would banks extend mortgages/lend money to fund individuals to strengthen buildings if the banks calculate that the loan-to-value ratios is not adequate? Banks won't lend for strengthening to people close to retirement age. 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. If many buildings are underinsured, or indeed not insured, it leaves cities no further ahead and no more 'resilient' than prior to the EPB Act. The impact of a significant event (earthquake, major storm damage etc) will still impact considerably on public funds. If we can't get insurance, or adequate insurance, people may not be able to get mortgages even if the building was strengthened to the legal NBS level. There is concern that the availability of experts (e.g. engineers, architects and construction builders). 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. 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? 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.

Is there anything else we need to take into account in setting these routes?

Comments

See above comments for concerns around reducing the time period for remediation and the overall impact of the EPB Act.

Attached Documents

| File |
|-------------------------------------|
| Earthquake-Prone Priority Buildings |