

To: The Hearings Commissioners for the Proposed Wellington City Council District Plan

From: Victoria Stace and Pukepuke Pari Residents Incorporated

Hearing Stream 1

Hearing time: Wednesday 22 February 11.40am – 12.20pm

Summary of key points

This submission focuses on the issue of the walkable catchment for Wellington City.

Legal Context

Policy 3(c) NPS – UD 2020 provides for building heights of at least 6 storeys within a walkable catchment of the locations at (i) to (iii) and Policy 3(d).

The PDP as notified includes a walkable catchment of 10 minutes. The s 42A report recommends a walkable catchment of 15 minutes. The additional 5 minutes would add/capture much of Hay Street in Oriental Bay. All of Hay Street would have been excluded from a 10-minute catchment of walkability.

The Submitter says that there are practical issues that need to be factored into walkability which is otherwise undefined. The standard of the average person walking speed omits to take into account real world factors which go to reasonable practicality.

Regardless of NPS requirements, it is a fundamental of the RMA that District Plan provisions be reasonably practicable. The approach to walkability is no exception. What is, and what is not, reasonably walkable involves a real-world assessment of practical factors, including the average person's willingness and ability to confront slope and wind, and safety issues.

Put another way, there will be a range of practicable options for achieving the objectives of the Plan and its implementation of the NPS UD while avoiding adverse effects on the functionality of the urban environment.

In this respect, the submitter argues that the characteristics of (most of) Hay Street and its location, will inevitably impact on its reasonably practical walkability. The inclusion of Hay Street in the walkable catchment will result in a poor functioning urban environment as future residents of apartment buildings seek to avoid using active transport.

Background to the issues around Walkable Catchment.

The National Policy Statement on Urban Development refers in Policy 3 to district plans enabling building heights of at least 6 stories within at least a walkable catchment of the edge of the city centre. The term "walkable catchment" is not defined.

The proposed Plan for Wellington City currently includes a walkable catchment of 10 mins. The Council's planners in their s 42A report have recommended that the walkable catchment for Wellington City be 15 minutes.

The document “Understanding and Implementing Intensification Provisions for the National Policy Statement” gives guidance on how walkable catchments are to be calculated.

What we argue

Point 1: The Council’s proposed time-based approach for specifying a walkable catchment is too narrow to reflect ‘walkable’.

- A time-based outer boundary should be a *starting point*, then further modified.
- The outer boundary should be shifted inwards where there are other factors working against walkability:
 - Steep slopes (i.e. should allow for the *extra effort* not just the slower walking speed);
 - Exposure to extreme winds;
 - Safety.
- As an example, the Council’s proposed upper boundary on Hay Street, Oriental Bay (including the “Hay Street Extension”) should be shifted downwards.

What we argue on Point 1 in summary– the walkable catchment should be calculated using the time an average person can walk at the outer boundary as a starting point, then shifted inwards where other factors work against walkability.

Point 2: If the area under consideration includes a steep slope, then what is “walkable” should be reduced to reflect that the average person will not be willing to walk very far up a steep slope.

- A Council’s current time-based approach treats as equally walkable: (a) walking 15 minutes on the flat and (b) walking 15 minutes including a steep slope:
 - A time-based approach only takes into account that people walk slower up a steep rise ...
 - ...not that walking for the 15 minutes takes more *effort* if it includes a steep rise;
 - As an example, consider Hay Street, Oriental Bay.
- Boundary of Council’s proposed 15-minute walkable catchment involves a steep rise of around **40m**:
 - This is equivalent rise to **around 13 flights of stairs**;
 - This makes the 15 minutes less ‘walkable’ than where the catchment is all flat.

What we argue on Point 2 in summary: The Council should use time-based approach as the first step – then shift walkable catchment boundary inwards where the walk involves a **steep slope**.

Point 3: If the area under consideration is particularly exposed to strong winds, then what is “walkable” should be reduced to reflect that the average person will not be willing to walk as far as they would if the area was not windy.

- “Wellington is undoubtedly the windiest city in the country” (https://niwa.co.nz/static/web/NZ_Climate-NIWA.pdf).
- Wellington has 198 days per year with winds over 61km/h (gale force) according to NIWA. Auckland has 55, Christchurch 51.
- Wellington is not equally windy everywhere:
 - Much of the Council’s proposed walkable catchment is in WCC wind Zone 3 “High Wind”;
 - But parts, including much of Oriental Bay, are **WCC wind Zone 6 “Extra High”**.
- The Council’s proposed time-based methodology for walkable catchment does not consider the impact of extreme wind exposure on walkability.

What we argue on Point 3 in summary: The Council should shift the walkable catchment boundary inwards where the walk involves **extreme wind exposure**.

Point 4: The walkable catchment should not extend to streets or walkways where the safety of pedestrians is seriously compromised. Safety is recognised as of particular importance in Objective 1 of the National Policy Statement.

- Illustrate with an example: “Hay Street Extension”, off Hay St Oriental Bay.
- A long (around 150m) shared, privately owned one lane roadway.
- On the boundary of the Council’s proposed walkable catchment (assuming a 15 mins walkable catchment).
- Should not be in walkable catchment from a **safety perspective**:
 - There are no footpaths and it is too narrow for any footpath, meaning pedestrians must walk on the roadway;
 - No turning area – cars frequently drive in reverse, increasing the risk of accidents;
 - There is no street lighting.

What we argue on Point 4 in summary: That segments unsafe for walking (such as ‘Hay Street Extension’) should be excluded from the walkable catchment.

Summary of key points:

- ⇒ A time-based walkable catchment boundary should be seen as the first step.
- ⇒ The boundary should be shifted inwards where there are other factors affecting walkability.
- ⇒ As a specific example, the boundary on Hay Street Oriental Bay should be shifted downwards due to the steep rise and extreme wind exposure. The case for exempting the “Hay Street Extension” is reinforced by safety issues.

