

## WELLINGTON CIVIC TRUST

### **Supplementary Submission on Resource Consent Application – Construction of a Hotel on the Outer-T, Queens Wharf**

#### **Introduction**

My name is Dianne Buchan. I make this submission as Chair of the Wellington Civic Trust. My personal involvement with the Wellington waterfront development dates back to when I chaired the Community Consultative Committee that produced the report *Public Consultations on the Waterfront Designs – December 1997*. I was also a member of the Leadership Group whose report, the *Wellington Waterfront Framework* April 2001, is the basis for the current waterfront plans – but not, significantly, the proposal which is before you today.

The Wellington Civic Trust has just celebrated its 25<sup>th</sup> birthday. The fledgling Trust cut its milk teeth in 1982 by launching the Harbour City Competition. Over the following quarter of a century the Trust has continued to be involved in the public debate on the planning of the Wellington waterfront. Along the way we believe some good, and some not so good, decisions have been made. We are here today to try to ensure that the treatment of the outer-T is included among the better decisions.

#### **Why the Trust opposes the application**

The Civic Trust opposes the construction of a hotel on this site because:

- (a) The applicant has not met the requirements of the Resource Management Act and
- (b) The project does not conform to the recommendation of the Wellington Waterfront Framework that there should be a competition to explore options for an “iconic” structure on the site and
- (c) The project does not comply with the Regional Coastal Plan policies for the Lambton Harbour Development Area.

The Act requires a consent authority to have regard to “any relevant objectives, policies, rules, or other provision of a plan” (s104 (d)). In this submission we will refer to several objectives and policies of the Regional Coastal Plan which are relevant to this project. We will be drawing commissioners’ attention particularly to the policies contained in s.4.2.45 which are specific to the Lambton Harbour Development Area.

### **A Waterfront Hotel**

The Trust contends that consistent with section 1(b) of the fourth schedule of the Resource Management Act 1991 the applicant should have considered possible alternative locations for a hotel. There are other waterfront sites that still offer fine views but more effectively meet the requirements of the legislation and the Waterfront Framework.

We have analysed the submissions and note that most of those who support the application do so because they believe the capital needs another high quality hotel.

The Wellington airport company, in a letter to the *Dominion Post*, wrote that the capital city requires five star quality hotels for business visitors and for the higher end of the tourist market.

BERL has argued in a report prepared for Lambton Harbour Management Ltd that a hotel which makes effective use of the city's prime location on a beautiful harbour is likely to increase the pulling power of the city as a visitor destination.

The Trust does not oppose the siting of a hotel on the waterfront. Indeed we suggested in our submission alternative waterfront sites which would better serve the needs of the target clientele, be less disruptive to other waterfront users, and would more honestly accord with the objectives, principles and values set out in the Waterfront Framework.

Many of those supporting the application expressed a wish to have Shed 1 replaced by something more appropriate to what is now a place for people not a place for cargo. We, too, see no future for Shed 1. But the opportunity presented by this site becoming vacant has to be fully explored. The public has been presented with one solution – the hotel. If asked which do you prefer, Shed 1 or a fifty million dollar five star hotel, it is not surprising that most people would opt for the latter. But that is not the real choice.

The Waterfront Framework presents a process involving choice – the applicant, supported by Wellington Waterfront Ltd and the Wellington City Council has presented one proposal only.

We are disappointed that there appears to have been no follow up on the proposals advanced by architect William Toomath regarding the Shed 6 site and the southern end of the Events Centre, nor any discussion of the potential of the old Site 102, between the Whitmore Street gates and Shed 21.

### **The Commitment to WIL**

It would seem that since 1993, maybe earlier, Wellington Waterfront Ltd and Waterfront Investments Ltd have been determined to put a hotel, of some sort, onto the outer-T. The first product of their collaboration was a modest \$10m conversion of Shed 1. Then plans were prepared for a hotel in terms of the 1998 concept plan, which provided for two ten-story Gateway Buildings on the outer-T. When that concept plan was abandoned in the

face of public opposition, Waterfront Investments returned to a hotel based on Shed 1, but adding Shed 6. The design was not considered good enough by the council's technical advisers and in December 2001 a new proposal for a five star \$35m hotel, essentially the one subject to this application, was submitted to Lambton Harbour Management Ltd.

But the proposal was not supported by the Wellington Waterfront Development Subcommittee, which recommended to council on 9 September 2002 that the proposal did not have sufficient merit. The council did not accept that recommendation and on 2 October 2002 it authorised Lambton Harbour Management Ltd to negotiate a lease with Waterfront Investments Ltd.

We do not, of course, blame Waterfront Investments for their persistence. We can but admire their determination, once they had a foot planted on the wharf, to stay put and rely on the council's own company to fight its corner.

And this they did. Lambton Harbour Management argued that a benefit of a hotel lease:

*"...is that it would not only pay for the substantial upgrading of the wharf piles under the hotel's footprint – essential work that would otherwise fall on the Lambton Harbour Development Project (that is the city) to pay – but would also contribute a substantial sum toward the provision of public space amenities on the remainder of the outer-T or elsewhere on the waterfront." (Waterfront Development Subcommittee Report 8 of 9 September 2002, para 6)*

In other words the hotel was seen as a cash cow to be tethered to this "special and unique place" for 99 years. Ironically, we learnt from the Capital Times on 19 October 2005 that this cow was not so easily milked and part of the cost of strengthening the wharf is to be met from project funds. We were not allowed to know the amount but "a spokesperson says it is less than \$15 million."

Ian Pike, the CEO of Wellington Waterfront Ltd claims that Wellington Waterfront Ltd "has a prior obligation to allow the hotel to be built, subject to the resource consent process" (Capital Times 19 October 2005).

If there was a prior obligation why was that not made clear to the Leadership Group – and indeed to the general public? What about the prior obligation to the Wellington public for transparency and consultation in the planning of its waterfront?

### **A Coherent Site**

No doubt this hearing will consider such legal, and political considerations to be outside its brief. However, there are planning and resource use implications of this abuse of process.

The outer-T is a coherent site, clearly defined by its eponymous shape and by its situation at the apex of Queens Wharf, which itself is the heart of Lambton Harbour. This proposal deals with one arm only of the outer-T. Neither of the relevant waterfront planning agencies of the council, the Waterfront Development Subcommittee and the Technical Advisory Group, has told us what is proposed for the other arm. Yet the hotel development will inevitably close off other options. CentrePort states in its submission that there will be implications for the southern arm if the outer-T is to remain part of the working port.

This piecemeal approach is bad planning and runs counter to the whole philosophy of sustainable resource management and the Waterfront Framework.

### **An Iconic Structure**

The architects believe they have delivered a design that with detailing, which has yet to be worked out with TAG, “*will result in an iconic building expected by the Wellington Waterfront Framework.*” (Sumich Architects, 1 May 2006).

But did we not expect, or at least hope, for something rather more special than this?

Wellington Waterfront Ltd recently lauded the design of the Meridian Energy Building on Kumutoto. Its eco-friendly, energy-saving design was said to be a template for all future developments on the waterfront. That template does not appear to have been applied to this design, which is surprising considering that any developer with a ninety-nine year lease on a property surrounded by harbour waters would do well to offer sacrifices to the god of global warming.

Initially the subcommittee’s technical advisers had reservations about the design but by February 2003 they were able to say that “*the proposal is architecturally restrained but it could be expected to contribute to the special qualities of the site.*” (TAG Review of Hotel Proposal for the Queens Wharf Outer-T, 3 February 2003).

Clearly TAG was not claiming what had been termed the WOW factor for this building. The criteria had shifted, perhaps under the influence of a council that was worried by the potential expense of achieving WOW status, especially when what was on offer appeared a relatively safe money-earner. If that is so Councillor Baber summed it up in council on 30 April 2003:

*“I do not need a wow factor or an icon. I want something that will do the job, attract activities and works financially.”*

The applicant however has not jettisoned the need to provide an icon for the site:

*“Hilton Hotels are iconic, the site is prominent and the architecture appropriate to the waterfront location.”* (Waterfront Investments Ltd, Assessment of Environmental Effects, page 36)

Hilton Hotels certainly have an established international brand and the prominent display of their logo on the outer-T will present a quality image that is replicated in many cities in the world. But we very much doubt that that is the image, or icon, that the Leadership Group had in mind. We think our waterfront deserves something which speaks more eloquently and more specifically for our waterfront and our community.

At this point I would like to call on architect William Toomath to comment on the quality of the building proposed by the applicant and the extent to which it can be considered an “iconic” structure. William is well qualified to assess the merits of this design in the context of the principles and objectives of the development of the Wellington Waterfront as a whole. As he will explain, he has had many years of involvement in the development of the waterfront both as an architect, and as a member of the Civic Trust Board.

[WILLIAM TO SPEAK]

The Civic Trust does not offer any vision as to what a suitable structure for the Outer T might be, but we do have a clear picture of the process which would produce the best solution for this special place – and that is the one recommended by the Leadership Group and set out in the Framework report.

### **Five Star Status**

Justification for this building on this site is based on the building being a 5-star hotel but what guarantees are there in the lease with Waterfront Investments Ltd as to the quality of the product so dearly bought? And what guarantees that five star status will be maintained over the 99-year lease? What are the terms of the management agreement with Hilton on this?

No doubt we will be told that these are commercially sensitive matters that cannot be disclosed to the public. But the public is being asked to alienate this special site, virtually for ever, on the basis of arguments the proof of which we are denied. The precise nature of these arrangements should be disclosed at this hearing. The public has a right to know, and the council’s company and its chosen developer have a duty to tell.

We are concerned that once the Hilton management experience the difficulties of operating a hotel on the outer-T they will seek to have restrictions on access and other matters affecting its profitability, eased. We have little confidence in Wellington Waterfront Ltd resisting such pressure.

The Framework requires ground floor spaces of waterfront buildings to be predominantly open to the public. The definition of *public space* given in the Community Consultative Committee report of November 1996 was “any space used by the public. There is an assumption that the public will feel comfortable using this space.”

The problem with a hotel, particularly a five star hotel, is that the high tariffs charged will effectively limit access. Not everyone will feel at ease in the public rooms of a five star hotel, or be in a position to meet the charges applying for services. The applicant’s argument in this respect is interesting:

*“Some submitters may oppose the proposal as being elitist and an opportunity only available to the rich. This is not the experience of the Applicant with the Auckland Hilton. The Framework seeks to cater “for all”, not just certain sectors of the community that some submitters might favour.”*

Given the number of million-dollar apartments planned to be provided on the waterfront, it would be difficult to claim that the top end of the market has been overlooked by Wellington Waterfront Ltd.

With room rates at the Auckland Hilton being in the range \$480 to \$620 a night during the high season we can assume that its target clientele is not the Kiwi battler but the affluent. Certainly Councillor Chris Parkin thought the Hilton would attract a particular segment of society:

*“They will be rich, they will be famous, they will be successful – and with a bit of luck they will be all three.”* (Dominion Post 1 May 2003)

But this ill-chosen site is by no means ideal for its target market. Councillor Parkin’s rich and famous visitors will have their up-market expectations deflated on approaching their destination through a claustrophobic underground car park, to emerge onto a windy wharf to find that their hostelry has 144 rooms but no suites. They may ruminate on the fact that the Auckland Hilton has 158 rooms and 8 suites and the Wellington Intercontinental 231 rooms and seven suites, including the Presidential.

If this is to be Wellington’s top hotel it should do better than that, and *would* do better given a more appropriate site.

### **Amenity Values**

The Trust disagrees with the applicant’s claim that “*any adverse effects on the environment will not be significant*” (para 1.4). We believe that effects on amenity values and the quality of public open spaces will be very significant.

Amenity value is defined under section 2 of the Resource Management Act as:

*“Those natural or physical qualities or characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes.”*

Objective 4.1.9 of the Regional Coastal Plan (RCP) states that amenity values must be maintained and enhanced. Under policy 4.2.19 the importance of amenity values is recognised and developments must avoid, where practical, any adverse effects on these values.

Policy 6.2.2 is also relevant. It states that development structures in the coastal marine area should not be used or developed where there will be adverse effects on such values as amenity, public access and views.

We believe that all of these values are significantly adversely affected by this proposal and I will comment later on the issues of access and views.

One of the Framework principles is that *“Any new buildings will be complementary to, and in a scale appropriate to, the existing buildings around them.”* We do not consider that this design satisfies that principle.

The application states:

*“The hotel building will be larger than the existing Shed 1 and thus it will change the relationship with neighbouring buildings such as Dockside, Shed 5 and Shed 6. However, this change needs to be assessed in the context of the Wellington Waterfront framework that seeks a building of significance on the Outer-T...”*  
(Assessment of Environmental Effects, Page 24)

The Framework does not “seek **a building** of significance on the outer-T”. What it asked for (and this proposal denies) is a *“competition to explore options for an iconic structure”* (Framework page 27). A “structure” does not have to be a building.

I can assure Commissioners that the Leadership Group chose the word “structure” very deliberately – we wanted options such as sculptures to be included for consideration.

When the Waterfront Development Subcommittee established maximum building heights for the neighbouring area to the north (then called Queens Wharf North, now Kumutoto) it designated two waterfront frontages adjacent to Shed 5 for new buildings. It gave indicative heights of 2-4 storeys for each (North Queens Wharf Brief, June 2002, Waterfront development Subcommittee). The site adjacent to Shed 5 is now occupied by The Steamship Wharf building. It is only two storeys. The other will be occupied by the Meridian Energy building, which is now under construction. It will have four storeys above ground level.

The Hilton plant rooms will be 23m above the wharf. This is about the same height as the central ridge of the Events Centre and higher than any other structure on Queens Wharf. The Events Centre is a mistake to be deplored, not a precedent to be followed.

The outer-T is an extension of the waterfront into the harbour and the blocking effect of a large building is that much greater. It is only to be expected that the Hilton management would want a building that imposed itself on its surroundings. It will do so; to Hilton's advantage, but to the detriment of the city's form, the capital's landscape and views.

### **Impact on Views**

Policy 4.2.45 of the RCP requires proposals in the Lambton Harbour Development Area to achieve, among other things, "development compatible with the urban form of the city." That form is an amphitheatre with the harbour as the stage. The Hilton will be in the front row of the stalls; a tall woman with a large hat. It is ironic that one of the CBD properties affected will be the capital's leading international hotel. Peter Intercontinental is to be robbed to pay Paul Hilton. There is little gain in that transaction for Wellington tourism and the Wellington economy.

Objective 4.1.10 of the RCP states that important views to and from the coastal marine area are retained. The most serious impact on views is the damage that will be done to viewshaft 8 from Johnston Street. The applicant describes the impact in the following terms:

*"The 'focal elements' of the viewshaft (i.e. the elements that are the purpose of the viewshaft) are stated by the District Plan as "Inner Harbour, Roseneath". In other words, it has dual purpose as an identifier of the location of the Inner Harbour (i.e. the near focal element) and the more distant suburb of Roseneath. The proposal, being larger than Shed 1, will result in a different balance between the focal elements with more 'Inner Harbour' and less 'Roseneath'. The purpose of the viewshaft will therefore be retained but with a different balance. If this is considered to be an adverse effect, the Applicant believes it to be minor."*  
(Assessment of Effects, page 24).

The Trust considers this to be a very significant adverse effect and we note that the Architectural Centre shares that view.

The city's viewshafts are extremely important. Pedestrians on Lambton Quay, the original shoreline, get these framed pictures of the harbour and hills, twin prompts as to a sense of place and a sense of history. We are told that the new view will provide "more Inner Harbour" and less "Roseneath". What we get, as the viewshaft perspective supplied by the applicant shows (appendix 1), is less inner harbour, less Roseneath and a big helping of Hilton, precisely where the logo is displayed.

But the damage is worse than that. Given that Shed 1 has to go, there is the opportunity to ensure that any new structure does not intrude into the viewshaft, as did Shed 1. The 1998 Concept Plan provided for that. The current proposal is a massive step backwards.

The Trust agrees, however, with the applicant that the effect on viewshaft 9 is not significant. But that is because an insensitive previous waterfront development, the failed retail centre, has been allowed to block the view down Brandon Street and in the words of the applicant the “integrity of the viewshaft has effectively been lost.” It would seem that rather than treating this as a disaster not to be repeated, Waterfront Investments and Wellington Waterfront embrace it as a useful precedent.

### **Effect on Public Open Space and Access**

RCP policy 4.2.45 states, inter alia, that the nature, purpose and function of open spaces, access and through routes have to be maintained.

The provision of quality public open space is the *raison d’être* for the waterfront development. In a real sense the waterfront buildings exist to define those spaces and to engage people who are drawn to enjoy those spaces. The effect of the Hilton proposal on the public open space on Queens wharf is therefore an essential element in evaluating the impact of the hotel.

While the new structure does not materially decrease the public open space on Queens Wharf it does close off options which might have increased it. It is, however, the impact on the quality of the space that is most significant.

### **The Degrading of the Queens Wharf Promenade**

The outer-T open space is particularly important because it is part of the waterfront promenade. The stem of the outer-T is a major pedestrian circulation area and views from the top of the T are the most expansive from anywhere on the waterfront promenade.

The Framework refers to the promenade as “the spine of the waterfront” (page 13):

*“It should be a shared pathway, designed to accommodate a range of non-motorised uses including strolling, cycling, roller-skating, scooters, pushchairs and wheelchairs.”*

Unfortunately as a result of this proposal the strollers, pushchairs and wheelchairs will be competing with taxis, cars, vans, coaches and service delivery vehicles on the outer-T. Their vulnerability will be posted on signs reading CAUTION WATCH FOR VEHICLES.

The proposed traffic management plan for the outer-T estimates that 450 vehicles a day will traverse Queens Wharf, making both an inward and an outward journey. Most will

emerge from below, deposit their passengers, circle the promenade in front of the hotel and disappear below. We are told that we may expect, on the average, one vehicle every one or two minutes. An estimated 35 larger vehicles, too high for the 2.1m height of the tunnel, will negotiate a rising bollard system, circuit Shed 6 and join the rest in front of the hotel.

This proposal represents the greatest threat to the public promenade since a decade ago, when the council proposed that it should double as a car-racing track.

The Trust is not convinced that the initial plan for vehicular entry will work in practice. It is convoluted and unwieldy. We do not accept the statement made in the Traffic Management Report that the *“intention is for the hotel to operate in a similar manner to the Hilton Hotel that is located on a similar site on Princes Wharf in Auckland.”* While both would be sited on a wharf, the Auckland facility has a dedicated two-lane road through the wharf which guests and service vehicles can use to access the building. There are dedicated ground level car parks close to the hotel and garaging facilities within the hotel structure. The differences could hardly be more marked.

Major changes are likely to be sought by the hotel operators to counter complaints from clients and this is likely to result in even further erosion of the rights of other waterfront users.

The applicant claims that a positive effect of the development would be *“enhancing the publicly accessible perimeter of the wharf by making it safer and more attractive to visit.”* The Hilton Hotel deal may well have prompted Wellington Waterfront Ltd to, at long last, face up to its responsibilities and do something about a long-standing problem – but that is not a justification for the hotel. The Framework report said, *“an urgent solution needs to be found to resolve existing potentially dangerous conflict between pedestrians and service vehicles along the promenade...around the southern end of Shed 6.”* The waterfront company could have dealt with this long ago by requiring taxis and small service vehicles needing access, to use the underground car park and existing ramp onto the wharf. It could also have installed a rising bollard system for the very few large service vehicles (e.g fire brigade appliances) that would justify access onto the outer-T.

Instead we have a situation where everyday pedestrians are exposed to the risk of serious injury from vehicles as these photos demonstrate:-

#### SLIDE SHOW

It has taken a multi-million dollar project to make this city council owned company act, and that tells us more about the priorities of the company, than the merits of the application.

The hotel will generate a substantial increase in large vehicles travelling around the Shed 6 promenade. We are told that although the Auckland experience suggests that the hotel will cater for a broad range of guests (Assessment of Effects, page 36) that range does not

encompass the coach traveller (page 27). That may be so, for the present, but that does not mean that coaches are not required to service hotel guests. We have been told that in the case of the Auckland Hilton, coaches frequently visit the hotel to bring guests from cruise ships or to take them on local tours. The applicant should produce figures showing the number of coaches that come to the Auckland hotel.

For the Wellington Hilton the number of daily coach visits is estimated at five. If the hotel does not maintain its five star status over the lease period of ninety-nine years it may be forced to go down market and cater for the group traveller. Moreover, we have little doubt that the Hilton, like every other accommodation provider, will attune marketing strategies to the realities of a dynamic industry.

We are not impressed by the proposed time restrictions placed on vehicles using the Shed 6 promenade. No account has been taken of the school holiday periods when there are substantially more visitors to the waterfront. In any case users of the promenade should feel that it will be vehicle-free at all times, and not just at those times of highest activity.

We are particularly concerned about traffic management for major events, such as conferences or major receptions. At appendix 10, page 33 it is proposed that guests arriving by taxis would use the public promenade around Shed 6 and not the underground car park and ramp.

### **Acoustic Performance**

The acoustic performance objectives set out at para 4.2.4 refer to reverse sensitivity and plant noise, but no mention is made of the possibility of the building itself generating noise in the high winds which are experienced on this site. The design involves a number of structural projections which might be conducive to such effects. This could be annoying to both those within the hotel and those in the immediate vicinity. We seek assurances on that aspect of the design.

### **More Wind on the Promenade**

The Opus report on wind assessment at appendix 8 indicates that the hotel would not increase wind hazards on this exposed site; indeed apart from the southeast corner (in southerly conditions) there would be significant improvements. However, in practice wind hazards would be increased because the hotel would require people to be on the outer-T regardless of weather conditions. Patrons of the hotel would be coming and going, as would staff and service personnel. Hotel guests would leave their vehicles at the drop-off point, which according to the architectural drawing 02 at appendix 1 is at the southeast corner of the building. This is the one area where the proposed Hilton will generate higher wind speeds than Shed 1 (appendix 8, page 15). The exposure may be brief, but in a southerly storm it is likely to be memorable.

This hazard is acknowledged in the further information supplied by the applicant. The solution favoured by the applicant is a freestanding canopy which would have further

blocked views from Queens Wharf. We are relieved to know that such a solution has been discarded. We can appreciate, however, why the developer is not enthusiastic about the favoured alternative which is a side ramp entrance to be used in southerly weather. This will inevitably undermine the impact of arrival at what will be billed a top destination.

No information is provided on how vehicles would approach, manoeuvre around and exit this side entrance.

If a southerly storm coincided with a major event at the hotel, the area in front of the Hilton is likely to be a scene of confusion and distress.

### **Shading of the Promenade**

The applicant claims that while the additional loss of sunlight will be an adverse effect, the extent is considered to be minor. This is primarily because during summer the extent of additional shading is small in terms of area and duration. But the studies undertaken for the applicant show that during the March and September equinoxes there is very substantial shading of the Queens Wharf pedestrian area until late afternoon. The effect in June/July is even more marked. This cannot be dismissed as minor given that the waterfront is meant to be a place for people in all seasons and that the warmth of the winter sun is particularly important in a public area.

The shadow analyses shown at appendix 9 begin at **9am**. Many use the promenade as their route to work. It would seem likely that the promenade along the eastern wall of Shed 5 would be in Hilton's shadow much of the year during those walk-to-work hours.

The eastern promenade of the outer-T would be in shadow most of the afternoon throughout the year. This is a part of the promenade with significant potential, because the views are spectacular. The existing Shed 1 also casts a shadow over this area, although for one or two hours less a day. But in any case it is not appropriate to use Shed 1 as the benchmark. The shed has no future, and what replaces it should be tested against the framework principles and standards of excellence as if there were no existing structure. That is what would have happened if the competition had been allowed to proceed.

The Trust considers that the loss of sunlight over a significant period of the year in an important public open space area is a serious adverse effect.

It is this *compounding* effect of traffic, wind and loss of sun on a very important segment of the waterfront promenade, which the Trust finds particularly unacceptable. We believe that it will produce a situation which is in direct conflict with the RCP policy to "ensure that the effects of development and activities do not detract from people's enjoyment of the area." (4.2.45)

## **Maritime Use of the Wharf**

The RCP policies include that the Lambton Harbour Development Area should remain “an integral part of the working port of Wellington.” (4.2.45). In our earlier submission we noted the applicant’s recognition of the requirement that the outer-T should still be used as a working berth for cruise and other vessels.

### **SLIDE SHOW**

As the photos show, the continued use of the Outer T as a working berth would seriously detract from the quality of the view from the public rooms and guest bedrooms in the proposed hotel. How long will it be before the hotel operators seek further restrictions on the size of vessels permitted to berth at the wharf?

CentrePort, which holds a licence from Wellington Waterfront Ltd to berth ships at the wharf, claims that its interests have not been properly addressed. The further information now supplied by the applicant indicates that vessels up to 120m could be accommodated without interfering with hotel operations, but anything longer would require a berth extension. CentrePort have indicated that total use of the southern arm would not be compatible with the operations of Helipro.

The conflicts between this proposal and the continued maritime use of the wharf are clearly documented in the officer’s report. We are concerned that this matter, which involves contractual arrangements between the waterfront company and major stakeholders, has not been addressed prior to this consent process.

## **Construction Effects**

The impact of construction of the hotel over a two-year period on the Queens Wharf area will be dramatic. We note from the submission of the Dockside Restaurant that it could jeopardise their business. The impact on waterfront-users generally will be immense, as the disruption will occur at the very heart of the waterfront.

The Draft Environment Construction Management Plan at Appendix 12 is too vague. If resource consents are granted for the hotel, they should be subject to specific, enforceable performance standards relating to, but not confined to, noise, public safety, and amenity issues. In establishing these standards the applicant, or their agent, should be required to consult with interested parties. The resulting draft construction management plan should then be referred to the regional council (not the Wellington City Council which is an interested party) for public consultation, consideration and decision.

**Conclusion**

The Wellington Civic Trust strongly opposes this application. The site no doubt provides a dramatic setting for a hotel providing fine views for those within. But that is at the expense of those without, and problems for all in terms of access and servicing. If these risks were to be borne solely by the owner and operator, community organisations such as ourselves would have less reason to be concerned. But that unfortunately is not the case. Many of the problems associated with access will be borne by other users of Queens Wharf. The degradation of the waterfront promenade, the greatest public asset on the waterfront, is unacceptable – indeed it is unforgivable. Moreover, we have strong doubts that a five star hotel will be sustainable on the outer-T site. In the end there will be no winners.

The Leadership Group determined that the outer-T is a very special site and its use should be determined only after a competition had been held to stimulate appropriate concepts. We believe that out of such a process we would be likely to get a better solution for the use of the outer-T, and open the way to find a better site for a waterfront hotel.

The concept of the waterfront development as a place for people – arose out of the Trust's Harbour City Competition, nearly a quarter century ago. A similar process should now be put in place for the future use of the outer-T. If the city council wished the Trust to organise such a competition we would take up the challenge.

But first, this ill-advised proposal to construct a hotel on the outer-T should not receive the resource consents sought.