



Submission on **Te Awe Māpara – The draft Community Facilities Plan**, about the need for more public toilet provision.

The outcomes we are hoping for from this Submission are

1. That public toilets will be given a higher profile in Te Awe Māpara and that the need for increasing toilet provision will be acknowledged by including this in the Key Performance Indicators in section 6.3 of the Plan, and
2. That the specific need for public toilets in Carrara Park will be recognised and that there will be a plan in Wāhanga 7: Mahere Mahi Action Plan for having them installed.

The lack of toilets in Carrara Park is a longstanding issue for Newtown residents. There are obvious unfortunate consequences; it is common for the caregivers of small children to resort to taking them behind a bush to relieve themselves, while other groups cut their visit short or avoid using Carrara Park for this reason.

Our Residents' Association made a submission to the then draft Playspaces Policy in November 2016, noting that Carrara Park was designated a Community Playspace, and as toilets were among the amenities to be expected at Community Playspaces we asked for these to be provided. We have asked several more times, but there are still no toilets in this well used public park.

There are 24 Community Playspaces listed in the Playspaces Policy, and almost all of them have public toilets on site or in nearby facilities. It appears that the Brooklyn Community Centre Play Area and the Chelsea St Play Area only have toilet access when the Community Centres are open, and the Cummings Park Play area might need to rely on the G.A.S. station or other commercial premises a few minutes away. The Jim Belich Playground in Adelaide Rd has no toilets, but they are across the road in Wakefield Park. The only other Community Playspace without toilets is Carrara Park, and this is one of the most significant and, in other ways, well-appointed playspaces in Wellington. We will elaborate on a needs assessment for having toilets in this park later in this submission.

The **Te Whai Oranga Pōneke: Open Space and Recreation Strategy** states on p35 “Over time we will evolve our network to ensure public toilets are available at or near (5-minutes' walk) of all community neighbourhood parks, destination parks, and significant beaches. They will also be considered at signature and regional trail destinations. *Further information on public toilet provision will be detailed in the Community Facilities Plan. (our italics).*”

Te Whai Oranga Pōneke p56-57 lists the Key Performance Indicators for that strategy, including KPI 7: Community parks, destination parks and significant beaches have access to a public toilet during the day.

Te Awe Māpara follows on from Te Whai Oranga Pōneke. On p 7, the draft says “The Plan provides a robust framework to guide the process of making decisions about our facilities.”

We submit that when it comes to the provision of toilets the Plan isn't nearly as robust as it should be, for the following reasons.

We are pleased to see that on P23 toilets are one of the outcomes under **Pāhekohekotanga – Accessibility**: • “Public toilets are freely available for Wellingtonians and support people's community

and recreation activities”, but this outcome isn’t carried through as one of the indicators to be monitored.

On p81 **6.3 Te aroturuki i te Mahere: Monitoring the Plan** says

“Key performance indicators are an important tool to assess the progress and impact of Te Awe Māpara. The Council will monitor progress against these indicators to measure how we are tracking against the mission and outcomes.”

Under Pāhekohekotanga – Accessibility on p82, accessibility seems to be defined in a much narrower sense than it was when considering ‘Outcomes’, and the only mention of toilets is in monitoring the “Number of Changing Places toilets installed in Pōneke.” This is of course extremely important, but not the only consideration. If the outcome of having toilets to support community and recreation activities isn’t measured and monitored it can be easily overlooked.

As mentioned above, Te Whai Oranga Pōneke has a KPI 7 “Community parks, destination parks and significant beaches have access to a public toilet during the day”. **We request that this KPI is carried over into Te Awe Māpara.**

Section 5.10 Wharepaku tūmatanui: Public toilets (p75-76) reviews a number of aspects of toilet provision. We note that under ‘Current State’ there is an outline of the existing toilets, but no acknowledgement of what is missing. However the ‘Key Findings from Needs Analysis’ does note “Key locations which featured for more provision include: – High traffic areas in the City Centre including Lambton Quay – At popular playgrounds, parks, beaches and walkways.”

On P76 there is an outline of how the Council will assess new public toilet provision. We are confident that we can demonstrate that there is a need for toilets in Carrara Park, it is feasible to have them there, and that any risks can be managed. This last point is important because we have heard that in the past Council Officers have assessed this location as too risky and have declined the request. We include our needs assessment, based on local knowledge and feedback from Park users, as an appendix to this submission.

Wāhanga 7: Mahere Mahi Action Plan outlines the Council’s priorities for detailed investigation of community facilities. In Wāhanga 7.2: “Actions F1-F25 are investigations focused on addressing identified significant facility issues and/or a geographic, functional, or capacity gap in provision.”

We note that only two gaps in toilet provision are identified - **F5 City Centre public toilet provision**, with a ‘very short’ timeline, and **F13 South-Eastern public toilet provision** “Aligned with direction from the Coastal Reserve Management Plan Review, complete a feasibility study for public toilet provision along the South-Eastern coastline..” with a ‘short’ timeline.

We submit that the need for toilets in Carrara Park should be added as another action with a ‘very short’ timeline. Our residents have already endured decades of frustration at the limitations imposed by the lack of toilets, which inhibits the ability to enjoy this lovely park to its full potential.

Rhona Carson
President, Newtown Residents’ Association
7th August 2023.

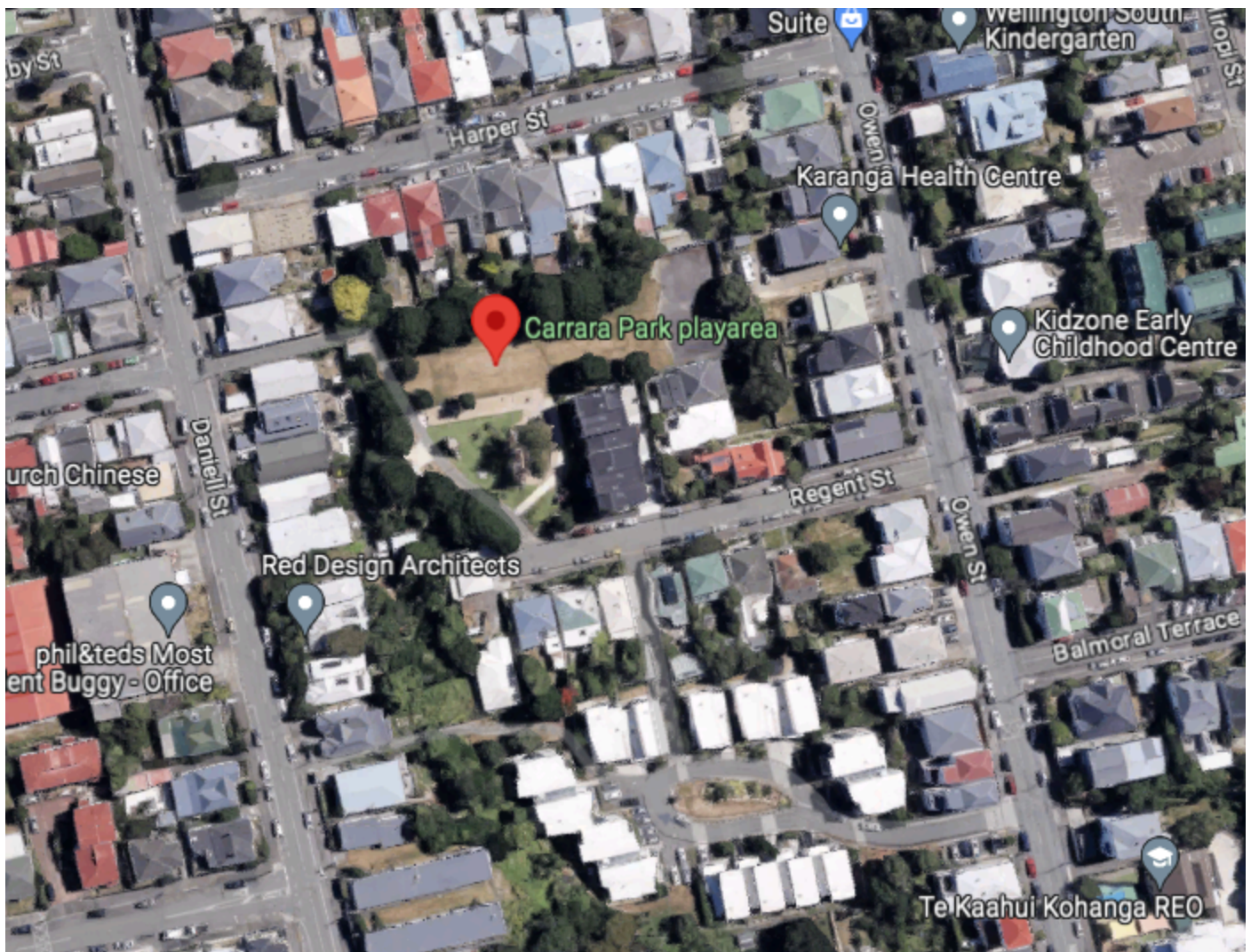
Appendix to Submission on Te Awe Māpara – The draft Community Facilities Plan.

A Needs Assessment for the Provision of Public Toilets in Carrara Park, Newtown.

Background

There is a long history to Carrara Park and its design. It was created in the early 1990s on the former site of the Carrara Ceilings and Mouldings Ltd factory, in response to a long-recognised need for open space for casual play and recreation for residents in the densely populated southern suburbs. The playground is well loved and well used, and the large expanse of open space on the north side of the Park is a great resource for all manner of casual sports and games. It has also been the venue for many community events over the years. There have been numerous concerts, Christmas carol sing-alongs, BBQs and picnics, and many other community celebrations.

The Park is completely surrounded by residential streets: Daniell St, Harper St, Owen St and Regent St. There are entrances on Daniell St and Regent St and the path through the park is a thoroughfare between these streets. There are a number of Early Childhood Education Centres nearby – some are captured in this photo and others are only a short distance away. Across the street to the south are the Regent Park Apartments, now part of Te Toi Mahana.



The play area has been upgraded in recent years. In 2019 the play equipment had reached the end of its expected life and was assessed as no longer meeting current safety standards, and there was a

consultation with the community about its replacement. During the consultation there were a number of requests for toilets to be installed, but these were ruled 'out of scope' because the budget was strictly for play equipment. At the same time the property at 4 Regent St was being redeveloped into 6 townhouses, and the reserves contributions from this development were used to provide BBQs and picnic tables to the west of the playground. These are very welcome additions, but have increased the urgency for providing toilets.

Needs Assessment

Spatial Distribution

The only public toilets in Newtown are in Constable St, next to the Newtown Library and the playground there, about 500m away. Residential streets surround the park and there are no commercial or other premises nearby with toilets available to the public.

Likely Demand

There is a steady flow of park and playground users on fine days. Pre-school children and their caregivers come during the day, and a number of the local ECEs bring their children to the park to extend their outdoor opportunities. They would do so more readily if there were toilets available.

The numbers using the park increase after school and in the weekends and it is a popular venue for family gatherings such as birthday parties.

When the lack of toilets was questioned in 2020 part of the response was *Most people who use this park are local and travel by foot to use the park and outside of organised community events the duration of stay is relatively short.* The current observation is that a lot of people do come from further away, by car or by bike. The fact that in March 2021 WCC advertised Carrara Park as "a great spot for the whole family to picnic together" might have something to do with this. If the stays are short this can be seen as a consequence of no toilet provision, and a reason why they are needed.

Newtown Residents' Association and Newtown Festival are often the people organising the community events in the park, mentioned above. This involves the expense of hiring a portaloos for the occasion, and arranging for it to be delivered and collected. Carrara Park is a great venue for events; they slowed down due to Covid but it would be good to see more of them return. If toilets were already on-site the organisation could be a lot more flexible – people wouldn't need to worry about the extra expense and rain days would be much more easily managed.

Peak Periods

The park is in use whenever the weather is fine, all year round. Usage increases after school, at weekends and holidays.

Te Whai Oranga Pōneke provision targets

Carrara Park falls within the target that "Public toilets are at, or near (<5 minutes) of community neighbourhood parks, destination parks, and significant beaches." There is no public toilet less than 5 minutes away from the park. Even if there were we query whether the 5 minute limit is appropriate for Community Parks – parents and children coming to these parks are best served by having toilets on site or very close by, to disrupt their enjoyment of the park as little as possible. The great majority of Wellington's designated Community Parks have toilets on site and Carrara Park is the outlier.

Feasibility assessment

Location

There is a suitable location within Carrara Park, and all the services – water, wastewater and electricity – are there.

Cost/benefit

Wellington City Council has provided a very well appointed Community Park but its full benefit to the community is severely compromised by the lack of toilets. The costs involved are managed at other parks, and it seems fair and reasonable that this should be extended to our community.

Risks

In the past Carrara Park had a dubious reputation; in fact in a report to the WCC Regulatory Committee in September 2013, when we had asked for permission to establish a Community Garden, Council Officers said - *After hours Carrara Park is used as an illegal drinking area and is regularly tagged. Officers anticipate that by improving community interaction with the park it will become a safer area.* A lot has happened since then, including the new townhouses at 4 Regent St which have opened up the park to a much greater level of surveillance from residents, but sometimes it seems that this reputation is hard to shake.

The mitigation of any remaining risks lie in positioning the toilets so they're not hidden away, and ideally using the modern toilets where the doors automatically unlock after a period.

Newtown Residents' Association

August 7th 2023