

7th May 2006

**Re: Proposed District Plan Central Area Review**

This submission is from the Wellington Architectural Centre, a group which represents both professional and non-professionals interested in architecture and design, and in the promotion of good design in Wellington.

**Support for the Proposed Changes**

Overall the Architectural Centre supports the proposed changes to the Central Area Guide.

**Introduction**

The Architectural Centre is fully supportive of the council commitment to achieve "high quality built form and urban design outcomes." We particularly encourage proposals which support the premise that all new building (whether alterations, additions or new buildings) should demonstrate an overall improvement in terms of public benefit over the existing site to gain council approval.

We commend the Council for its shift towards a more "intelligent" design guide that will maximise the possibilities good designers can bring to the city. We caution though that the success of such a guide will depend on having the appropriate skills within the council to administer the guide well. This will depend on the council employing and looking after capable staff and providing council resources to maintain and develop their skills, investing in bringing international design experts to Wellington and having some kind of sabbatical system for council staff to learn from other councils, both nationally and internationally. If such a commitment to maintaining and encouraging high skill levels in council officers is not able to be supported then a more conventional and less satisfactory guide with minimum standards will be needed to set building standards.

We do however have some concerns about the proposed Central Area guide in that it appears that the Council is being re-active rather than pro-active, and we encourage the Council to adopt a more visionary approach to long-term planning.

**1) Central Area: design guidance and review of character areas**

We endorse a continued distinction between the high city and the low city. Whilst we would support a flexible height limit in the high city, we encourage the council to maintain the distinct height character in the low city (by strictly enforcing maximum heights), and to ensure that activities such as car mechanics, panel beaters etc. which will service inner city residential areas are preserved. We also consider that the Council ought to take this opportunity to clarify the storey vs height provisions (e.g. six storeys/ 27m). We understand that the original intent of this provision was related to storey height, not to overall height (i.e. six storeys with a maximum total of 27m, not as many storeys as can be accommodated in 27m). We support a confirmation of storey rather than maximum height.

We support the council's proposal to have only one Central Area Design Guide, and suggest that the opportunity be taken with this review to simplify the Central Area perimeter. We suggest that the perimeter should be rounded off and made contiguous with motorway edge. Areas which are currently inset as Residential should be changed to Central Area with caveats or reserve conditions placed upon them.

The Centre supports the change to implement the Design Guides as Discretionary Activity (Restricted). We also support the proposal to include building bulk and mass as a Discretionary element. The proposal to redefine character areas as heritage areas is



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also supported. In addition we suggest that "impact on heritage value" be introduced as a criteria as part of the Central Area Design Guide to evaluate alterations and additions to existing buildings.

## **2) Central Area: defining heritage/character areas and associated building height controls**

The number of Heritage areas has increased, but there is inconsistency between heritage buildings marked in pink, and ensuing Heritage areas. For instance the Wesley Church complex is now proposed as a Heritage area, yet none of the buildings are noted in the map provided as currently being recognised as having heritage value. In other areas, such as upper Courtenay Place, there are a number of heritage buildings and yet there is no associated Heritage area, as this has been limited to lower Courtenay Place only. We call for greater consistency, rigour and rationale in the boundary of the Heritage areas proposed. In addition we suggest that the following areas be investigated as possible new heritage areas: Chinatown (Frederick and Haining Streets); the Hannah Factory precinct and surrounding heritage buildings (Leeds and Eva Streets); a new Lambton Precinct (Brandon, Johnston, and Grey Streets), and Aro Valley. We also consider that given the increasing development in Te Aro and the increasing disappearance of light industrial buildings in the area that the council conduct an appraisal of Te Aro with the aim to institute at least one heritage precinct containing the best examples of light industrial architecture.

We support the council's proposal to consider the context of key heritage buildings as precincts, which need to be reflected in more appropriate height limits for buildings neighbouring heritage sites. We cautiously support the council's assertion that buildings in heritage areas reflect and enhance the overall character of the heritage, but stress that naive mimicking of heritage buildings is not productive for the urban environment. It is important for design to demonstrate current construction techniques and not to be negatively compromised by requirements to earnestly reproduce or imitate neighbouring heritage buildings. We support good and robust design over sycophantic concessions to heritage which naively mimic neighbouring heritage buildings.

## **3) Central Area: Building height**

We support the council proposals in this section, but especially emphasise the importance of stricter height control than has been recent practice in the low city. Maximum height restrictions in the low city should be changed from Not Permitted to Prohibited. Maximum height should mean Maximum height, and developers should not be permitted to flout this at will. There have been too many compromises that are causing irreparable damage to this area of the city fabric. We would however support more complex ways to determine total bulk and mass – suggesting maximum volume, rather than height, as a possible measure of restriction in the high city.

We support the proposed review of heights in heritage areas, and strongly endorse the proposal to, in some instances (e.g. Cuba Street), enforce minimum heights as well as maximum heights. We support the move to remove permitted baselines from the building height and bulk and its effect on wind, sunlight to public space and urban design, except in instances where sunlight is an important part of the street character (i.e. Courtenay and Cuba Streets). We understand that in Cuba Street the overall aim is to ensure that sunlight into Cuba Street is not compromised, and various methods of achieving this should be offered rather than blanket restrictions to maintain diversity on the street.

We are not convinced by the proposal to use sightlines from the street to allow setbacks prescribed by a constant angle as this could produce monotonous forms of buildings and sad chattered edges – which will become apparent above street level. Given the council's aim to encourage inner city living, views of the entire form of buildings revealed in viewpoints from above street level will become increasingly important for the council to consider.

## **4) Central Area: maintaining residential amenity**

While we are pleased that the council's research demonstrates that Wellington does not have the same scale of problem Auckland City has regarding apartment size, we do think that it is naive to not have a minimum apartment size in the District Plan. While Wellington may not have a significant problem now, to leave the door of quality unguarded is unwise. Developers are, by definition, and by nature, after maximum profit, and restrictions should be in place before, rather than after, third world apartment sizes become endemic. Auckland will suffer from its lack of foresight for the next 50 years or so, and we would prefer Wellington does not suffer the same affliction in the future. We suggest a minimum apartment size of 30m<sup>2</sup> for studio apartments, and a minimum of 45m<sup>2</sup> for one bedroom apartments. We strongly support the Council's proposal to include provisions to ensure that amenity is provided on site to remedy the current situation where apartment amenity can be built out, and commend the council for this fantastic suggestion. In addition we consider that the Multi-Unit Design Guide provides useful guidance for Central Area apartment design and we strongly encourage the council to require that Central Area apartment designers demonstrate that they have met the relevant requirements of this document.

We also support the Council's proposal to encourage renewable energy strategies in inner city buildings. In this regard we consider that the council should actively support the reuse of buildings, and encourage sustainable apartment and office building design (e.g. zero net emissions buildings such as CH2, Melbourne). We encourage the council to work in collaboration with other councils to provide resources and expertise to support developers to incorporate sustainable strategies in their buildings, both in new buildings and in retrofitting existing buildings. Council and government buildings must be exemplars in this regard. We also encourage the council to discourage car-parking in the city (including addressing this by reducing the number of car parks required in apartment buildings in the Central Area).

As noted previously we support the proposal for all new building to be a Discretionary activity.

#### **5) Central Area: public amenity – 'active edges'**

The Architectural Centre applauds the move to require display edges to the identified streets. We would go further however, and strongly encourage the council to require that ground floor uses to all central city streets be for active use, such as light industrial, retail, or commercial. We also strongly encourage the council to ban car-parking on ground floor street frontages (to ensure an active edge, and vitality on city streets), and to ban residential use at ground level. Residential developments without an associated ground floor open area for the residents to use, are severely sub-standard. We note that once unit-title provisions for carparks are in place, ground floor carparks are highly unlikely to be converted to provide active edges. The Council needs to be more pro-active regarding this.

#### **6) Central Area: public amenity – pedestrian shelter**

We note that in many cases verandahs can be destructive to the architectural intentions of buildings, and while we applaud the council's intentions to encourage shelter, there needs to be some relaxation of the rather blanket provisions of the current pedestrian shelter rule. For instance, shelters that are completely separate from the building can be just as effective as ones that are continuous and these should be a permissible option.

#### **7) Central Area: public amenity – protecting sunlight to public spaces**

The proposed change regarding the inclusion of new areas as public space (e.g. the Lagoon area, Kumutoto Plaza, Post Office Square, Courtney Plaza and Denton Park), and the exclusion of areas which were not constructed as planned (e.g. Chaffers Beach), or which are outside the Central Area (e.g. The Dell) appears sensible. While we applaud the Council's plan to protect existing public spaces, we believe that the Council needs to be far more pro-active in protecting the future of the city. The Council needs to identify future parks and open spaces, and protect these as well. A key

example is Swan Lane car park, earmarked as a potential future public park. While it is currently locked in a state of car related use due to an obstreperous land owner, it is imperative that Council acts now to change its status to open space, and to ensure that it can not be built out nor sunlight be obstructed. A similar attitude needs to be applied to key thoroughfares (e.g. Courtenay Place), as well as designated public spaces, where sunlight is a key aspect for use and a single over-height building could ruin this.

We also encourage the integration of the Council's abandoned draft Inner-City Greening Plan into the Central Area plans.

#### **8) Central Area: temporary activities**

We support all the proposals for temporary activities. These events are part of what makes Wellington such a vibrant city, and should be encouraged.

#### **9) Central Area: public amenity – signage**

Signage restrictions currently relate to signs higher than four storeys and those which are in flashing neon. We approve of neon (and other illuminated signage), both in flashing and non-flashing modes and consider that strategic encouragement of such signs in concentrated areas could productively enrich well-used areas of the city at night and supplement the existing character of some areas of the city (e.g. Courtenay Place), or create a sense of security and urban vibrancy in other areas. We also approve of increasing the Council's control over the quality of proposed signage design, both in the structural support and siting, as well as the content of signage. We support moves for better sign design and maintenance. We would also point to the sometime dangerous proliferation of signs on footpaths which must make disability access difficult on some footpaths in Wellington city. We suggest the council also consider possible ways to mitigate this problem.

#### **10) Central Area: public amenity – protecting views**

We support the moves to reassess viewshafts. Currently in Wellington most viewshafts are related to sea views. We would note that views of iconic Wellington architecture are as important a part of the visual coherence of the city as are views of the sea. While there are currently viewshafts from the Carillion outwards, should there not also be views towards the Carillion itself? For instance, the view from Mount Victoria tunnel to the Carillion is one of the strongest visual links in the City, and should be preserved. There are other such views as well and we support moves to explore and expand the number of viewshafts.

We deplore the current practice of allowing viewshafts to be built in (i.e. Events Centre, Hilton Hotel, etc.) and strongly encourage the council to ameliorate compromised viewshafts when demolition or rebuilding allows an opportunity to do this.

We also caution the removal of viewshafts above the maximum building height standard, especially as the council has indicated a flexible attitude to building height. While we support a flexible approach to building height in the high city (but not the low city) such flexibility must not compromise these viewshafts which currently appear redundant because they are well above the current maximum building height standard.

#### **11) Central Area: public amenity – wind**

We support the aim to clarify the purpose of these standards and consider that where appropriate wind tunnel tests could be replaced by wind assessment reports. We also support the strengthening of the assessment criteria and the change of reporting standards to the number of hours that a certain wind speed is acceptable or unacceptable.

#### **12) Central area: public amenity – noise environment**

We strongly support the requirement for controlling of noise from fixed plant and would also support a council crackdown on illegal external speakers that broadcast direct to the street. However businesses such as the Matterhorn or the Southern Cross that have long-established music venues should not be made susceptible to other uses that

have arrived since their establishment. It is important to maintain a balance between existing uses and new activities to encourage vitality in the city both night and day. If late night functions or events are prohibited there is less activity on the streets and consequently areas of the city become considered unsafe.

We note that Council efforts to require insulation on inner city apartments are largely ineffective because of the extremely low standards set. If the Council wishes to set noise standards, significantly higher required standards must be set.

**Conclusion**

Thank you for the opportunity to be involved in this early round of consultation. We hope our comments assist in the development of the Central Area Design Guide and we appreciate the general direction which the Council appears to be taking in this aspect of the District Plan review.

Yours sincerely

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