24th February 2006

Re: 203 The Terrace, Wellington Service Request No: 131365

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.

Members of the Architectural Centre who are associated with the design of the proposal, or who are associated with firms involved in the design (and hence may be seen to have a conflict of interest), have had no input into the writing of this submission.

Opposition to the proposal

The Architectural Centre does not support the proposed building in its current form.

Introduction

While the proposal fails to comply with many rules, we recognise that this in part arises from the building straddling the Inner Residential Area, and the Central Area, which causes some degree of contradiction in the rules (e.g. the provision of yards and site coverage). This will require the council to interpret the situation with common sense, which we encourage.

We also have several specific comments to make, including areas of concern, which we discuss below.

Specific Comment

1) Maximum Building Height/ Height Control Adjoining Residential Areas (City Area Rule 13.1.2.1; City Area Rule 13.1.2.2; City Area Rule 13.1.2.2; Discretionary (Restricted) Rule 13.3.2)

While the building borders on both the High City (ie south of Boulcott) and the residential (8 or 10m height), the scheme is actually sited in the Low City, and as such it fails to comply with the maximum building height (10 storeys or approx 43m).

We consider that for a project to warrant breaching the District Plan height limits it <u>must</u> be of an exemplary quality, and it <u>must</u> give additional value to the public and the city. While we can understand how the increased height will give additional value to the developer, we do not consider that any additional value is provided for the public by this scheme (on design or amenity grounds). Instead the additional height will impact negatively on neighbouring residential properties casting greater shadows than permitted, and will reduce the value of other properties in the neighbourhood which will be deprieved of views more extensively than permitted by the Plan. We strongly urge the council to oppose the scheme on these grounds.

2) Sunlight Access (Inner Residential Area Rule 5.1.3.5.3; Discretionary (Restricted) Rule 5.3.3)

We consider that the failure to comply with the sunlight access rules needs to be addressed. We consider that the failure to comply is largely a product of the excess height of the proposed building discussed above.

3) Vehicle Parking (Inner Residential Area Rule 5.1.1.2)

The building does not comply with the required minimum one space per household unit. While the scheme does not comply, we consider the fault is with the rule in this case. The requirement for to provide car-parking in the inner-city does not encourage a move away from car-culture which is needed to relieve congestion, the impact of traffic on the



environment, and to encourage more walking and cycling in the city. We recommend that the council revise this rule, and support its inner-city citizens to use alternative means of transport to the private car. Many inner-city residents do not own cars and instead sub-let or sell the alloted carparks to others which undermines the initial intent of this rule.

Other Comments

It is important to note that the report on the impact of the building is unhelpful in the way that it frames much of the discussion in terms of measuring the building against a previous scheme rather than the requirements of the District Plan. Because the current proposal is an improvement in relative terms to a previous scheme, does not in itself prove any merit to the current scheme, despite the report attempting to push this view. We strongly encourage the council to be conscious of this technique, and to ignore these references to the previous scheme.

Conclusion

The Architectural Centre does not support this scheme. In particular it is strongly against the failure to comply with the rules regarding maximum building height and height control adjoining residential areas. This is a critical point and the key reason why the Centre opposes the proposal.

Yours sincerely

Christine McCarthy President Wellington Architectural Centre