

20 October 2006

**Re: Proposed District Plan Change 46 - Subdivision Design Guide 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.

**1) Support for the proposal**

The Architectural Centre gives unreserved support for the proposed improvements to the Subdivision Design Guide, and hence support Option 3 - Adopt a Reviewed and Updated Subdivision Design Guide.

**2) The Need for Compulsion**

We acknowledge that the Subdivision Design Guide addresses key issues for the creation of subdivisions. This is not proverbial "rocket-science" but rather the basic but critical issues for a working subdivision. The Section 32 Report (p. [6]) states that "the Subdivision design Guide has been somewhat less effective than originally anticipated." In this vein we support the improvements made to the Design Guide but also query whether all or some of the Design Guide should be incorporated into the District Plan as rules to raise the level of subdivision development - much of which does not address or engage with the key issues outlined in the Design Guideline.

**3) Other comments**

We would also like to re-iterate comments from recent discussion with council officers, that subdivisions can be created without sideyards and frontyards if housing is well designed. We believe that increasing suburban sprawl is not the answer to Wellington's issues of lack of space, and so therefore urge council to disallow greenfield site development while there are valid options for intensification and available brownfield sites. We remind council of the necessity for situating new subdivisions near sources of public transport.

**4) Conclusion**

We support the proposed changes to the Subdivision Design Guide.

Yours sincerely

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