

26 August 2016

Freepost Wellington City Council
District Plan Team
Wellington City Council
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Re: WCC Draft Housing Choice Plan Change for Tawa and Newlands

This submission is from the Architectural Centre, an incorporated society dating from 1946, which represents both professionals and non-professionals interested in the promotion of good design.

General Comments

1. The Architectural Centre supports increasing residential density in areas surrounding existing town centres and on main transport spines. We support intensification, rather than the expansion of urban limits, in order to limit urban sprawl, and its negative consequences for:
 - a) infrastructure provision (including transport)
 - b) energy-use and carbon emissions
 - c) the erosion of agricultural land on urban fringes. Close proximity of food to people is likely to become increasingly important in the future with respect to issues of climate change and energy-use.
 - d) the impact of extensive impermeable surfaces (paving, asphalt etc.) on water quality and impact on stormwater
 - e) long-term, as distinct from short-term, issues of housing affordability.
2. We also note that increased density demands that the Council take greater responsibility for better public space provisions (design and setting minimum areas in higher density neighbourhoods). The identification of appropriate green spaces throughout the suburb ("green corridor") is important to ensure sufficient recreation space, permeable surfaces and biodiversity, and needs to occur simultaneously with any Plan Change to implement greater densification.
3. The council has identified issues of sustainability as important. Energy-efficient construction (building and site management) is an important aspect of this. It is possible to build zero-energy housing, and achieving this will also contribute to the long-term affordability of houses. The District Plan needs to specify zero-energy building as the norm, without doing this we are simply building infrastructure which will continue to use energy long into the future. Strategic foresight, such as requiring zero-energy building, is needed to mediate the future problems resulting from global warming.

Specific Comments

Definitions

4. We do not support the definition of landscaped area as including the phrase "does not include any building, structure or paved area." We suggest instead "does not include any building, but may include structures built as part of a larger landscape or urban space, and does include paving, including permeable/porous paving." If the intention is to use the term "landscaped area" to prescribe areas of green space, then we recommend that this term, "green



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space," ought to be used, as such a narrow definition of landscaped area is contrary to professional practice usage in New Zealand.

4.1 Introduction

5. We do not support the deletion of "and facilitated." We believe that the Council must encourage and facilitate high quality comprehensive redevelopment of housing. This is particularly the case with the proposed Urban Development Agency.
6. We strongly support the statement that "As development densities increase, there is a need to ensure good quality design." We also consider that relying solely on council officers to interpret the provisions of the District Plan may be insufficient to ensure good quality design outcomes and (as suggested in our submission of 9 April 2015), we consequently recommend the establishment of a Intensified Developments Design Committee to approve medium and high density in the way that Urban Design Panels operate (e.g. in Auckland), perhaps for Restricted and Restricted (Discretionary) activity statuses.

4.2.1.4

7. We particularly support the phrase: "Encourage greater housing choice by promoting the provision of a variety of household types and sizes ..." In accordance with this support we would be keen to work with the Council in promoting higher density housing types, including, for example, an annual weekend of public site visits to showcase good design in higher density residences. We have begun to look into possible Wellington examples with the aim of initiating such an event.
8. We also note that it appears that the proposal would not necessarily achieve the greatest range of housing types, including projects such as the WCC's social housing block in Kilbirnie (Kotuku Apartments, Kemp St).
9. We also note that the calculation of developer contributions, based on the number of infrastructure connections to housing, rather than occupancy (i.e. number of bedrooms), biases against one and two bedroom dwellings, which is the type of housing increasingly sought, and which would enable greater intensification. We strongly encourage the council to change the way developer contributions are calculated in order to better support the provision of smaller dwellings.

4.2.1.4 METHODS

10. We recommend replacing the text "a more intensive, urban feel" with "greater building density." The aim is to increase density, which may or may not have a specific appearance.
11. The discussion regarding landscaping needs to reference the WCC Water Sensitive Urban Design Guide.
12. The idea that planting softens the visual impact of new building works is code for the use of plants as camouflage to hide poorly designed buildings which do not engage the human scale and are not well detailed. The Centre does not consider this purported aesthetic function to be a valid reason for the retention of front yards, especially in the context of ever-increasing land values. (also 4.2.3.2 METHODS)

TERRACE HOUSING

13. Infill housing can be successful (see Vancouver) but for the suburbs which are likely to undergo significant redevelopment (e.g. Kilbirnie and Johnsonville), the

District Plan should discourage infill housing to enable a terrace housing form to be developed. The only reason for not requiring terrace housing in all suburbs is the question of how a transition to this form would work. We encourage the Council to commission suburban built form studies in order to consider how to increase the occurrence of terrace housing as a more efficient use of sites.



Terrace house, Bullingdon Rd, Oxford, England (Andrew Dawson and Igea Troiani)

14. The District Plan is biased against terrace housing. This is explicit (4.2.1.4 METHODS). It naively assumes that the District Plan does not currently privilege "the repetition of a single development type" (which most aerial views of Wellington will contest) and that terrace housing must always result in streetscape monotony.



Parsonson Architects, Zavos Corner, Mt Victoria, Wellington (Parsonson Architects)

15. The Centre does not believe that the current use of building recession planes produces a particularly valid house form or site useage and instead often awkward or banal geometries result in elevation in new projects for no functional or aesthetic value.
16. The Draft District Plan signals change in character for Johnsonville and Kilbirnie. This change in character includes no requirement for ground level open space in Johnsonville (1) and Kilbirne (5.6.2.3.1). We consider this proposal is too extreme and increasing height to allow for 4-5 stories to allow for terrace-type housing and the provision of ground level open space would be a better design solution than what is currently proposed.
17. Such a model could prescribe a volume which can take any form within a prescribed footprint that ensures building close to the front boundary and maximises the area of the rear yard which would back on to a neighbouring rear yard, and maximise sunlight.

Thank you for this opportunity to comment on the Draft Housing Choice Plan Change for Tawa and Newlands. If you have any questions please do not hesitate to contact me.

Yours faithfully



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