

6 December 2015

Freepost Wellington City Council  
District Plan Team  
Wellington City Council  
P.O. Box 2199  
Wellington 6140  
housing.choice@wcc.govt.nz

**Re: WCC Khandallah: Housing Choice & Town Centre Plan**

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. The Architectural Centre strongly supports increased residential density housing because, if appropriately located and well-designed, increased residential density can prevent urban sprawl, support the use of public transport and active modes, and result in more efficient land and infrastructure use. Achieving increased residential density will require research to identify need (including locations, house types, infrastructure, and community facilities, as well as open spaces), for example demographic and population studies. Our initial comments explain broadly our support for council intentions for medium-density housing, and related issues.

**Building form, height and design**

1. We support developments in the range of three to four storeys in height, but acknowledge that the design of the relative scale of the building, rather than the physical size of the buildings, will be a critical factor in determining the acceptability and appropriateness of the mass and form of any development in any given context. A project's ability to convey a human scale through design detail and material selection will be key to this. Stated and visual preference surveys will be the useful way to establish an understanding of public preferences regarding building form and height.

2. We caution against stringent regulation of design and appearance and instead suggest that the council institute a medium- and high-density housing design review panel comprising: an architect, a building scientist, an engineer, a property developer, a sociologist, an urban designer and two members of the public; and mandate review by this panel as part of the District Plan process for all resource consents for medium- and high-density housing, and to stipulate this in Housing Accords for developments within Special Housing Areas

**Mixed use and alternative housing models and mix of occupants**

3. We support mixed-used developments, incorporating retail, hospitality, office and community-oriented tenancies with residential uses. The District Plan must enable residential accommodation above commercial premises in suburban centres.

4. We encourage the council to consider options for co-housing and papa kainga developments along with any necessary review of current regulations.

5. We support the provision of designs accommodating a mix of occupants in terms of:

- (a) income/occupation (including social as well as affordable housing),
- (b) family structures,
- (c) ownership models (i.e. rented tenancies and company share schemes), and



the architectural centre inc.  
PO Box 24178 Wellington

(d) ages (especially the inclusion of housing for older and retired people).

In this context, the Centre supports 30% of every development of three or more dwellings to be social housing. We note however, that the provision of social housing by a private developer will likely require use of council social services in order to be viable.

### **Transit- and Active transport-oriented development**

6. We support increasing residential density along key transport spines. As housing density increases a greater number and frequency of buses and trains will be needed to prevent increased suburb to city traffic congestion. Council commitment to increased residential density must be matched with a regional council commitment to increased provision of public transport and improved design and provision of bus shelters. We consider that any increased residential density needs to:

(a) be transit-oriented or transit-interdependent, primarily through being centred on the train station or a bus terminus (and transit routes), with reliable and high frequency commuter services, and sufficient services to accommodate people working late or socialising in the CBD. The distance from the transit station and set of services (e.g shops) should provide 5 minutes walking/400m radius pedestrian-shed catchment, noting that this is supported by Carmona et al's research (2010, p. 237).

or

(b) (for developments larger than five households) have, as part of their resource consent conditions, a car-share scheme with a maximum of one car provided for every five households. We consider that council facilitation of more car-share schemes through District Plan provisions is important to reduce Wellington's level of car ownership and support more sustainable transport options.

7. We encourage the council to investigate alternatives to cars on individual lots. This could include clustered vertical parking to free up the footpath (e.g. due to vehicle crossings for garages). Provision of secure cycle and motorcycle storage as a substitute for car parking should also be encouraged.

8. We encourage the council to remove the requirement for one carpark to be provided per dwelling. As an example, the council's support of "Converting a large family home into two smaller units" ("Karori as a medium-density housing area") will likely be tripped up by this parking requirement and demonstrates the importance of removing this carparking requirement to support increased residential density. A byproduct of removing carpark provisions will be to reduce the number of driveways, thus increasing cycling safety.

9. We especially support developments which implement council aims to provide better infrastructure for cycling, walking and public transport within and between the suburb and the Wellington CBD. Key principles for cycling routes include:

- (a) designing a city-wide network which indicates route priorities, reflecting need (e.g. maximising use) and strategic priorities (e.g. high accident areas), as well as identifying primary and secondary routes.
- (b) the design of a cycling network needs to be cognisant of the characteristics of cycling (i.e. not a state highway mini-me which assumes that bikes operate like cars), for example, strategically placed dropped curves, off-road sections, use of lane ways and easements, mixed route

- options, awareness of topography and dominant wind directions (including aspects such as placement of pedestrian crossings).
- (c) building out from the CBD to maximise uptake
- (d) uninterrupted routes (e.g. minimising or removing interruptions caused by driveways, and road intersections)
- (e) the reduction of driveways and the impact of roadside car parking (e.g. consider angle parking on one side of the road and counter-flow cycle lanes on the other)
- (f) designing the difficult (e.g. narrow) lengths of the cycle route first in order to ensure consistent city-wide conventions
- (g) removing car parking from arterial cycling routes
- (h) consider the full range of bike user skills (e.g. novice, expert) and bike use (e.g. commuter, recreational), and the possible need for different options for these distinct groups.
- (i) building an appropriate level of infrastructure. Soft infrastructure may be more effective, flexible and appropriate in some contexts than hard infrastructure. Flexible infrastructure is needed to retain route choice (esp. in the CBD and in suburban centres; this is less critical on arterial routes).
- (j) facilitating cultural change to encourage respect by all for all modes of transport

We do not support the building of isolated cycleways in the suburbs, nor the narrowing of footpaths to provide space for cycle ways.

### **Sustainability**

10. We strongly encourage the council to require that all medium- and high-density development be zero-net energy (potentially including grey water recycling for toilets, rain water collection, green roofs, solar-hot water heating and/or photovoltaic panels) and include construction waste minimisation plans. Likewise we support the council adopting Homestar as a mandatory rating tool for sustainability, especially now that the NZGBC has established a multi-unit housing rating tool. In addition to sustainability benefits, sustainable developments will reduce building operating costs, better supporting social and affordable housing ambitions.

11. We also point to the need for the council to incorporate sustainable design principles in Town Centre Plans, including increasing permeable surfaces, the use of swales to manage stormwater and other aspects such as those included in the WCC's Water Sensitive Urban Design Guide.

### **Amenity**

12. We suggest that the District Plan encourage developments which proactively contribute to high quality and useable public space. Greater density will only work with greater levels of public amenity, including parks and other public spaces, and increased public transport and active transport opportunities.

13. We acknowledge that the council is considering a range of possible sites for potential development. We encourage council to require that all development master planning and house designs be an integrated process to ensure that privacy, outlook and access to light etc. can be considered across all buildings and public spaces. We also consider that the expertise of a design review panel (as per (2)) would play an important role in this.

### **Additional policy work and central government lobbying**

14. We encourage the council to lobby central government to improve tenancy laws, including the implementation of a rental Warrant of Fitness scheme, with the aim of better supporting long-term tenants for whom such medium density

developments are likely to be appealing if a sense of permanence, through improved tenancy agreements, is possible.

### **Infill housing**

15. We strongly consider that infill housing is another mechanism which needs to be supported by the city council to achieve increased residential density. Not all increased density has to be provided by developers, and we believe that an even playing field, for both home owners sub-dividing and developers, is needed. Currently the District Plan and related regulations appear to discourage infill housing and give preference to developer developments. Examples of difficulties experienced with infill housing include:

- (a) the gap in **fire regulations** between CSA1 and CSA2, which requires an alternative solution to address issues of egress not covered in CSA1 (single-dwelling), in situations where the requirements of CSA2 (commercial buildings) are excessive. We encourage the council to develop a range of acceptable solutions to address the gap between CSA1 and CSA2 to assist designers of infill housing. It has also been suggested to us that the new fire regulations are inappropriately driving design and that MBIE's priorities need to change in this respect.
- (b) **Building Recession Planes** (BRPs). There are a number of issues relating to BRPs, which add to difficulties with infill housing. It is acknowledged that because BRPs are measureable they are generally manageable, but three specific issues have been identified:
  - (i) BRPs are often too restrictive a mechanism for given sites' sizes and shapes, with, for example, problems arising over minor encroachments (e.g. "issues that were with the volume the size of a wine cask!")
  - (ii) Feedback from some of our members suggests that there is a lack of understanding regarding BRPs by some council staff.
  - (iii) There is also concern following the Environment Court ruling in *Aitchison v Wellington City Council* regarding retaining walls, and instances as a result where subterranean BRPs are occurring.

There is a question as to whether BRPs are the most suitable mechanism given Wellington's topography, and we would favour a mechanism which is more responsive to our topography and minimises (or eliminates) the need for excavation and retaining walls. We have had suggestions of a terrace house model (where building is discouraged in the rear yard, and higher density (up to 3-4 storeys with no side yards) occur at the streetfront of a property) as being more effective than BRPs, and can see this concept working in new areas of increased residential density (e.g. the north-end of Adelaide Rd, which is now a Special Housing Area), but we are not sure how a transition to this model would work in established areas with existing infill housing. We consequently encourage the council to investigate international best practice with respect to planning instruments used to control building form and height, including surveying the mechanisms which are used in other councils, and considering these with respect to Wellington's topography, existing building patterns, and findings from stated and visual preference studies. In addition, we encourage the council to prefer planning instruments which discourage backyard development, and encourages greater densification nearer street frontages.

- (c) We consider that a significant relaxing of **site coverage** is needed for an effective increase in residential density. In major urban centres site coverage is not an issue if public amenity is of a high quality, and designs provide for privacy, outlook and sunlight. The expertise of a design review panel would be key to the success of this.

(d) We also consider that, to be economically viable, infill housing in established areas will necessarily be of a high quality, so that cheap development is a low risk in these situations.

### Special Housing Areas

16. We encourage high- and medium-density options be investigated in designated Special Housing Areas and a masterplan and design guide developed for each of these. We consider that the council should implement a design panel to review master plans and design guides, and, in areas with existing heritage buildings, that these are retained for community use and/or apartments (e.g. adaptive reuse) to support community heritage, character, identity and council's sustainability goals.



Peterborough apartments, Christchurch (left) | Erskine College, Island Bay, Wellington (right)

### High-density housing



Barbican, London (left) | Arlington Towers, Margate (facade modulated to maximise view and sun) (right).

17. We note that the Barbican in London is a highly successful high-density council development, as both a housing complex, a community facility (with art gallery, theatre, restaurants and conference venues etc.), and an urban public space. Tying a housing complex to a development which provides key cultural or commercial infrastructure could both build on and strengthen the identity of specific suburbs or town centres. We consider that due to surrounding topography, Island Bay has good potential for successful high-density developments in addition to increased medium-density housing.

### Specific issues re:Town Centre Plans

18. Transport issues are important in suburban centres. This is to encourage use of public transport, and to maximise foot traffic outside local businesses. We consequently support:

- (a) wide foot paths, to encourage lingering. and the use of outdoor public space, and to enable flexibility for active transport (pedestrian, cycle, scooter and skateboarding) shared space
- (b) good provision of street furniture to encourage people to occupy spaces providing natural surveillance and safe streets
- (c) the plentiful provision of bike paths. Bike parking is more efficient than car parking, meaning that more people are able to access services and shops
- (d) proactive strategies to sustain local businesses, as these are key to the success of suburban centres, including restricting the scale of any one business. For example big box retailing, and large supermarkets can kill suburban shopping areas, because they swamp the market and provide a "park and buy" mentality. Smaller shops require walking and complementary shopping habits.
- (e) restrict parking to the periphery of suburban shopping areas to encourage foot traffic and social interaction
- (f) proactively reduce traffic through the shopping area.

#### Concluding comments

19. Finally we are disappointed that the brochures used in this consultation show weak images of medium-density housing. There are a number of **excellent built examples of medium-density housing in Wellington** which would give a much better idea of the quality and variety of design options. Award-winning examples include: Seatoun Waterfront courtyard houses by Studio Pacific Architecture (2003); the Altair, Newtown, by Architecture+ (2006); Park Mews (1975), Hobson St, Thorndon, and Daniell St, Newtown (c2015) by Roger Walker; -Peter Beaven's 1975 Habitat Housing (Thorndon Mews); and Marshall Court Apartments rebuild, Miramar by Designgroup Stapleton Elliott (2015). None of the images show sites typical of Wellington, but are drawings of only flat sites. We hope that future council material includes photographs of high-quality built examples, including **interior images to convey to the public the kind of living which medium-density enables; and housing on sites with topography similar to that of Wellington**. In a similar vein the poor resolution of the pdf (which does not even survive screen-viewing) also undermines the images used, and means the proposed catchment lines are extremely fuzzy. This is a simple and mundane technical issue for which there is no excuse for getting so wrong.

20. In addition, we very strongly encourage the council to facilitate **an open-house weekend of high quality examples of medium-density housing in Wellington** to help with increasing public understanding of the potential for medium-density housing, and to create a discerning and demanding public with respect to housing quality. This could be a collaboration between owners, architects and developers, supported by council and showcase the attractiveness of living in medium density housing.

Thank you for this opportunity to comment on the Khandallah: Housing Choice & Town Centre Plan initiative. If you have any questions please do not hesitate to contact me.

Yours faithfully



Christine McCarthy  
President, Architectural Centre  
arch@architecture.org.nz