

9 April 2015

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District Plan Team  
Wellington City Council  
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**Re: WCC Tawa: Housing & Town Centre**

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 medium-density housing in Tawa, and has the following specific comments to make. We note that some - but not all - of these comments are reiterated our Karori submission.

1. While we suggest developments in the range of three to four storeys in height, we consider 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.
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: a city councillor as chair, 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.
3. We support mixed-used developments, incorporating retail, hospitality, office and community-oriented tenancies with residential uses.
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 income/occupation (including social as well as affordable housing)), family structures, ownership models (i.e. rented tenancies and company share schemes), and ages (especially the inclusion of housing for older and retired people). We note however, that the provision of social housing by a private developer may require use of council social services to be viable.
6. We are conscious that increased residential densities of people, as far away from the Wellington CBD as Tawa is, will likely increase the number of cars populating Tawa, even with a concerted effort to increase employment opportunities for local residents. Given this, we consider that any increased residential density needs to be
  - (a) transit-oriented or transit-interdependent, primarily through location to the train station or a bus terminus (i.e. within 5 minutes walking), with reliable and



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high frequency commuter services, and sufficient services to accommodate people working late or socialising in the CBD.

or

(b) have, as part of its resource consent conditions, a car-share scheme with 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. On a related transport issue we encourage the council to confine medium-density developments in Tawa to a 5 minute-walking /400m radius pedestrian-shed catchment around a set of services, noting that this is supported by Carmona et al's research (2010, p. 237).

8. 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 frontages of driveways and/or garages). Provision of secure cycle and motorcycle storage as a substitute for car parking should also be encouraged.

9. We suggest that the current bifurcation of the Tawa Town Centre by Main Road, and its heavy traffic levels might be able to be assisted by innovative large-scale housing developments on sites which straddle Main Road and provide additional ways to connect the two sides of the Town Centre. While this might require developments of a larger size than 3-4 storeys, a well-conceived development could make a productive contribution to the urban design and permeability of Tawa.

10. We strongly encourage the council 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 is launching a multi-unit rating tool. In addition to sustainability benefits, such developments will reduce building operating costs, better supporting social and affordable housing ambitions.

11. 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.

12. We suggest that the District Plan encourage developments which include public thoroughfare through sites, and that all such developments be required to proactively contribute to high quality and useable public space.

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

14. 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 Tawa, as well as better ensure the success of such developments.

**Additional issues**

15. There is another issue worthy of mention related to democratic processes that this consultation raises, specifically the poor timing of the consultation submission date of 17 April. This co-incides exactly with due dates for:

- 1) Karori: Housing & Town Centre
- 2) Draft Long-term Plan 2015-25
- 3) Wellington Urban Growth Plan & Implementation Plan

The submission date is also in very close proximity to dates for:

- 1) Proposed Waterfront Development Plan 2015-18 (24 April)
- 2) 2015-16 Draft Development Contributions Policy (30 April)

In addition the Greater Wellington Regional Council have submission dates for a number of significant consultations closely co-inciding:

- 1) Draft Climate Change Strategy (10 April)
- 2) Shape your Region: 10 year plan 2015-2025 (20 April)
- 3) Proposed amendments to Resource Management Charging Policy (20 April)

All of these are related to issues of the built environment and the closeness of submission dates may negatively impact on the quality of submissions, and the ability of community and volunteer groups with interests in our city's built environment to write submissions.

We appreciate that when we asked the council for some flexibility regarding submission dates this was positively addressed for us. Regardless we encourage greater consideration of related deadlines when setting submission due dates in order to better facilitate meaningful public engagement and consultation.

Thank you for this opportunity to comment on the Tawa: Housing & Town Centre medium density housing initiative. If you have any questions please do not hesitate to contact me.

Yours faithfully



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