

17 December 2015

Freepost Wellington City Council
District Plan Team
Wellington City Council
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Re: WCC Tawa - medium-density housing

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.

Draft medium-density residential area (MDRA) zone boundary

1. We are concerned that the MDRA boundary does not align with the 5 minute walking catchment area. In some parts it is inside of the 5 minute catchment, at others within the 10 minute catchment, and at others still outside of the 10 minute catchment. This is to say that the MDRA zone boundary line appears to be completely arbitrary. We recommend that the initial MDRA boundary aligns exactly with the 5 minute catchments (noting that this is supported by Carmona et al's research (2010, p. 237)), and that this MDRA boundary is reviewed in 10 years' time. Additionally we question the wisdom of including Takapu Road Station as an Existing Centre. Given its proximity to Tawa, we suggest replacing Takapu Station with Tawa Station as a centre. This would have the effect of thickening and consolidating the 5 minute catchment zone. Currently the proposed MDRA is thinly spread and, we think, vulnerable to not gaining sufficient critical mass and coherency.

Draft medium-density residential area (MDRA) standards

2. The MDRA building standards stipulate a retention of building height (8m), "*with scope to build to 10.4m in certain situations e.g. along wide roads.*" There needs to be more clarity regarding when the 10.4m height is permissible. We suggest that all developments within the 5 minute catchment zone be permitted to build up to 10.4m high, regardless of road width.
3. The standard proposed regarding BRPs is an increase from 45° on all boundaries to 56° or 63°. We support the removal of BRP on side boundaries within 14m of the street frontage.
4. We support the increase in site coverage to 50%, but consider that the council needs to identify green corridors through the suburb, which might enter private properties in the rear yard (5m from rear boundary) and restrict building in the rear yard, but allow additional building height within 14m of the street frontage. The Melbourne nature strip may be a model useful to consider in parts of the suburb to supplement other parts of a green corridor strategy.
5. The standard for front yards is proposed to be an absolute 3m. We recommend that this be further reduced to being the lesser of 2m or 10m minus half the road width.
6. Regarding open space, we consider that the requirement for open space be the area 10m from the rear boundary or 20m² which ever is the larger.
7. We strongly oppose the retention of 1 vehicle parking space per dwelling. This will make quality medium-density unachievable, especially given the need for a greater number of 1-2 person dwellings. We also note that the statement that the council would "*like to encourage converting large family homes into two smaller units. This type of development still gives housing choice but has fewer*



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impacts e.g. loss of privacy, spaciousness and character" is counter to the provision for 1 vehicle parking space per dwelling, as meeting this requirement will likely impact on spaciousness and character when attempting to convert an existing house into two or more dwellings. We strongly encourage the council to support sustainable and active transport modes. While we encourage the complete removal of carparking requirements, alternatives might be:

- (a) Removing the requirement for carparking when a house is 5 minutes from a bus stop or a train station.
- (b) Removing carparking provision if covered space for two bicycles is provided.

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

Yours faithfully



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