

2 July 2007

Re: Plan Change 56: Managing Infill Housing Development

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.

Support for the proposal

The Architectural Centre supports the proposed district Plan Change re: infill housing. We consider the aim to increase the quality of infill and multi-unit housing developments is important to the continuing development of Wellington as a city, and the commitment that the "Council seeks to promote excellence in the design of multi-unit residential developments" (Appendix One: Proposed Plan Change, § 28) is strongly supported by the Centre. The focus on ensuring quality of residential amenity is a strength of the proposal. We hence support the intention that, where proposed developments have not been anticipated by the Plan, "the assessment of the consent will include consideration of whether the amenity values of adjoining neighbours are affected and whether the proposed development is out of scale with the surrounding residential environment." (Appendix One: Proposed Plan Change, § 21). In addition to this we suggest that when proposed developments have not been anticipated by the Plan, this is noted to be addressed in future updating of the Plan.

We note the introduction of the Residential Design Guide is to replace the Multi-Unit Design Guide, though the title of the Residential Design Guide inaccurately implies that the guide is able to cover the full range of residential buildings. Its relevance for some residences, such as three to four storey developments such as apartments, seems much more limited, and the guide needs to be made relevant to apartment design in the inner city to ensure parity of residential amenity and good design for all residences in Wellington.

Design flexibility and responsiveness to site (Residential Design Guide p. 3)

We strongly support the acknowledgement that "Sometimes, a design objective may be best achieved by means not anticipated in these guidelines. In such situations, it is justifiable to depart from a relevant guideline if it can be demonstrated that an alternative design solution better satisfies the associated design objective." We think this is a key paragraph and enables the design guide to provide detailed guidance and the possibility for sophisticated and progressive design to occur. The Centre consequently also supports the council's encouragement of pre-application meetings ("Relevance" p. 3)

Subdivisions

We strongly support the proposal that subdivisions are now Discretionary (Restricted) activities (proposed Rule 5.3.14), bringing them into line with the requirements of multi-unit housing.

**Variation in alignment and form (Residential Design Guide G1.11 p. 6);
Monotonous repetition (Residential Design Guide G1.14 p. 7); Visual Interest
(Residential Design Guide G3.8 p.15)**

It appears that a picturesque strategy of variation, asymmetry and the breaking up of larger forms is privileged in the Residential Design Guide over symmetrical, formal, and larger blocks (which are considered as a visually dominant "evil"). We consider this a simplistic strategy which ignores the possibility that well-proportioned and well-detailed



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design of larger and/or more symmetrically formal building might be appropriate in some circumstances. Equally the privileging of material variation (paving patterns, material combinations and planting) as the prime means for providing visual interests, forgets valid strategies of sculptural moulding and shaping space, the use of proportions, and considered construction details to convey the sense that an area is not simply a "service area."

In addition, it may be productive for the guide to discuss roof planes, which can be a dominant and monotonous repetitive feature in domestic architecture. Some guidance on variance in roof plane angles may be a productive focus.

Complementing neighbourhood character (Residential Design Guide G2.2 p. 9)

We strongly support the recognition that "period details or "reproduction heritage" ... can, and often do, detract from the character and value of place." We support the inclusion of less obvious connections to context (e.g. proportion, as distinction from scale) and the need for building to be unashamedly of its time in terms of materials and building technology used.

Species characterising the wider setting (Residential Design Guide G3.10 p. 15)

We query the significance of extending the planting and landscape patterns that characterise the wider setting. While we acknowledge plant selection needs to acknowledge the site, blindly repeating the existing planting patterns is as irrelevant as blindly following existing building patterns. We ask that the council support more sophisticated ideas of engaging with site context.

Frontages to the street (Residential Design Guide G2.3 p. 9)

The requirement for buildings to provide a public face to the street strongly echoes turn of the twentieth-century Victorian orientations, which tended to privilege orientation to the street over orientation to the sun. We suggest the Residential Design Guide makes explicit that the orientation to the street must not be at the expense of the orientation to the sun, and that (unlike the illustration reminiscent of Peter Beaven or Miles Warren Christchurch in the 1960s or early 70s), this guide does not necessarily require the building to be aligned parallel to the street, when other alignments provide better results.

Outdoor Space

We support the return to an open space requirement per unit (35m² Inner Residential and 50m² for Outer Residential). We especially appreciate the clarification given in Appendix One: proposed Plan Change Objective 4.2.3.1.A that "the provision of adequate open space on a site may mean that the maximum permitted site coverage is not able to be achieved. In this situation reduced site coverage, or a reduction in the number of household units will generally be the appropriate way to manage development density on the site (rather than a waiver of the open space requirement)." We consider the requirement for the design of positive (rather than left over) "outdoor space of reasonable size with northerly exposure ... connected to the anticipated main living floor" (Residential Design Guide G1.2 p. 4; Subdivision Design Guide G6.2 pp. 2-3) is an important and key concept. We support the ability for the massing of open spaces into larger areas common to many dwellings.

The requirement for the private open space to be a minimum 4mx4m and "nominally flat with a gradient not greater than 1 in 12" is likely to be inappropriate in many sloped or steep sites in Wellington (G3.1 Residential Design Guide p. 12). Alternative guidelines need to be provided for steep sites, perhaps increasing the surface area required and allowing a steeper gradient.

We consider that the requirement that "each dwelling should not be subject to direct short range overlooking" (G3.2 Residential Design Guide p. 13) is a critical issue for multi-unit dwellings in close proximity. We suggest that "direct short range overlooking" needs greater definition for this guide to be usefully applied.

While we appreciate the requirement that "the 'principle area' of the private open space ... receive ... no fewer than 3 hours of direct sunlight on 21 June between the hours of 9am and 3pm" (Residential Design Guide G1.7 p. 5), we wonder whether different patterns of habitation might mean that other times of the day (rather than 9am-3pm when many at working or at school) might be more appropriately considered.

Proposed limit of 4.5m for second units (Outer Residential Area)

We support the proposed height limit of 4.5m for a second unit (Appendix One: Proposed Plan Change, § 21; New Rule 5.1.3.4.3 (§ 40)).

Additions and Alterations to Non-complying Existing Buildings (Rule 5.1.3.A.2 (§ 44))

While we support the sentiment of Proposed Rule 5.1.3.A (§ 44), this prescribes the footprint as exempt suggesting that the elevation and section of the existing building are not exempt. We strongly suggest that the term "footprint" is added to the use of "envelope," such that Proposed Rule 5.1.3.A.2 reads: "any addition and alteration is allowable within the existing building envelope. Any addition or alteration within the footprint, but outside the existing building envelope, must comply with rules 5.1.3.4 (maximum height) and 5.1.3.5 (sunlight access)."

Retention of significant large trees (Subdivision Design Guide G6.7 p. 3; Residential Design Guide G1.12 p. 6; Appendix One: Proposed Plan Change Objective 4.2.3.1C (§ 25))

We support this.

Landscape Treatment (Subdivision Design Guide G6.5 p. 3)

The term landscape "treatment" suggests the site or building has some dreaded disease or illness. We are concerned that the relationship between building and planting in the Design Guide appears to be one of illness and cure. There seems to be a determining of the role of vegetation as amelioration - as if hard surfaces and the built environment are always deficient and in need of natural cover. We suggest a more positive phrasing conveying a more complex understanding of the different components of design.

On-Site Water quality treatment (Subdivision Design Guide G6.10 p. 4)

We applaud the council for requiring the incorporation of on-site water quality treatment measures where practicable.

Service facilities (Residential Design Guide G3.16 p. 16)

We consider that recycling bins should be accommodated wherever there is a space requirement for rubbish bins, especially given Wellington's hills and winds.

Weatherproof storage area (Residential Design Guide G2.9 p. 10)

We do not support the requirement for a "secure weatherproof storage area or cupboard accessible from the outside with a minimum internal volume of 1m³" for dwellings without a lockable garage. This seems to be an inappropriate level of detail for the council to require, especially without an explanation for why the council would require such a space.

Thank you for the opportunity to comment on this proposal. We are strongly supportive of the council's aim to achieve excellent design in infill housing and multi-unit dwellings. If you have any questions regarding our proposal, please do not hesitate to contact me.

Yours sincerely

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The Architectural Centre