

11 March 2013

District Plan Team
Wellington City Council
P.O. Box 2199
Wellington 6011

Re: District Plan Change 77: Curtis Street Business Area

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.

1. Opposition for the District Plan Change

The Architectural Centre opposes the proposed District Plan Change. We oppose the proposed DPC for the following reasons:

(a) The proposed Plan Change proposes **weak planning mechanisms** to achieve what we consider to be important aims of sustainable design, good urban design and appropriate site use (e.g. "*promote* an overall high standard of urban design" (§35.2.2.3); "*encourage* the retention of trees and vegetation along the western edge of the area adjacent to Old Karori" (§35.2.3.3); "*encourage* the use of a pre-approved concept plan"; "*encourage* energy efficiency and environmentally sustainable building"). Stronger mechanisms are needed to ensure that the stated council aims are actually able to be achieved. The Centre believes that these principles need planning controls which will ensure these outcomes.

(b) The site is proximate to an established green corridor and above the culverted Kaiwharawhara Stream. As an historic council depot and landfill, it is likely that the ground has some degree of contamination (noted in §35.2.10 explanation). It is also the thinnest part of this ecological corridor and so is particularly in need of sensitivity. We recommend a requirement for **wildlife corridors** on the site. We also believe that any development ought to also address the need for site remediation. Information regarding the degree of contamination should form part of the information included in this proposed District Plan Change. We consider that **reinstating Kaiwharawhara Stream** would form part of any remediation proposal.

(c) There are multiple references to a **concept plan** for the site (e.g. §35.2.1.2, §35.2.2.2, §35.2.7.3, §36.7(a)), but no concept plan is provided. We consider the inclusion of the referenced concept plan as important in evaluating this proposal for a District Plan Change. We consider that reinstating Kaiwharawhara Stream should be included in this concept plan.

(d) The proposal for **sustainable building** is a worthy one but should also include requirements pertaining to construction/site waste management etc. (§35.2.9.2; 35.2.10). It also must be noted that aspirations for "appropriate levels of natural light" (§35.2.9.2) could be at the cost of high levels of heat loss and higher energy-use, and that achieving energy-efficient and environmentally sustainable building must involve holistic understandings of a design rather than singling out one potential energy-saving aspect.

(e) How specifically will the council take into account the principles of tino rangatiratanga, kaitiakitanga and Te Tiriti o Waitangi (§35.2.8.1) in this project? What



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will be required of projects to demonstrate that they comply with this requirement to "acknowledge ancestral relationships with the land and natural world" etc.? This site appears to have significant potential for a meaningful engagement with the principles of tino rangatiratanga, kaitiakitanga and Te Tiriti o Waitangi given the historical significance of the Kaiwharawhara Stream to Māori. Reinstating the stream inconjunction with consultation with iwi appears to us to be appropriate.

(f) While we support any positive contribution development might make to the natural environment, we are concerned that 35.2.3.2, which discourages "the use of reflective and brightly coloured building materials" might led to an uninspiring mediocracy of cream, beige and olive greens. We suggest instead promoting the use of natural materials and finishes (e.g. stained timber, weathering metals etc). We also consider that issues of size and scale of building and monolithic colour to be much more critical in this context. In this respect we consider that the **proposed gross floor areas** listed in §36 as the limits beyond which an application would be a Discretionary Activity (Restricted) are too large for this site (i.e. retail activities exceeding 500m²; commercial activities exceeding 2500m²; Integrated retail activities exceeding 2500m²; supermarkets exceeding 1500m²). We support the Urban Design Assessment which recommends that "any development on the site resulting in a total gross floor area exceeding 500m² (cumulative) ... be assessed" (p. 2). We also consider that the assessment criteria to break up building forms *and* to form an integrated solution (§36.7(b)) may be contradictory.

(g) We support the provision of **good public mass transport** (§35.2.5.2; §35.2.4 explanation). If the council is serious about encouraging this then ensuring that a variety of building uses on the site, which minimise activities which encourage private car use, because of the size of objects purchased (e.g. building supplies), must be limited. What building uses on the site would encourage use of public mass transport, and how can these be accommodated? We consider that addressing issues pertaining to public mass transport are complex and include destination matches as well as more obvious infrastructure such as bus routing, bus stops and good bus shelters. A possibility would be to extend the route of the No. 14 so that it travels along Curtis St.

Thank you for this opportunity to make a submission on this proposed District Plan Change 77: Curtis Street Business Area.

Yours faithfully

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