

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
IN WELLINGTON CITY**

**I TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE  
O TE WHANGANUI-A-TARA**

**IN THE MATTER**  
of the Resource Management Act 1991

**AND**

**IN THE MATTER**  
of the hearing of submissions on the  
Wellington City Proposed District Plan.

**HEARING TOPIC: Hearing 2 - Residential**

---

**Statement of evidence of Graeme McIndoe and Andrew Burns  
on behalf of McIndoe Urban Ltd**

**Urban Design**

**16 March 2023**

---

## **INTRODUCTION:**

1 Our full names are Graeme Robert McIndoe and Andrew Davies Burns. We have jointly prepared this statement of evidence on behalf of McIndoe Urban Ltd (**MUL**) in support of our submission on the design guides in the Proposed Wellington District Plan (**PDP**).

2 We are both directors of McIndoe Urban Ltd. We made our submission on the proposed design guides and are producing this evidence in order to help Council ensure a high amenity future for a growing city with effective and efficient design control in the form of statutory design guidance.

### **Qualifications and experience**

3 We made our submission and have produced this as a joint statement of evidence:

#### **3.1 Graeme McIndoe**

I am a registered architect and qualified urban designer and the founding director of McIndoe Urban Ltd. My qualifications include MA Urban Design; Dip Urban Design (Dist); BArch(Hons 1); BBS. I have over 40 years professional experience.

#### **3.2 Andrew Burns**

I am a qualified urban designer and chartered member of the Royal Town Planning Institute (MRTPI) and a director of McIndoe Urban Ltd. My qualifications include MA Urban Design (dist.); Dip Urban Design; BArch; BBS. I have 30 years professional experience.

4 As an established Wellington-based specialist urban design consultancy, we have assisted WCC over four decades in multiple roles as urban design consultants and advisers, resource consent design reviewers, on the waterfront TAG, and giving evidence in support of Council in hearings, in the Environment Court and at a Board of Inquiry. Urban design consultancy on district plans and design guidance is fundamental to our practice, and we've been working in this field since 1992. The

summary of our relevant experience below records our involvement in the projects cited by our initials.

- 5 District Plan consultancy
  - 5.1 2016 ongoing, Porirua City Council District Plan, urban design advice (GM)
  - 5.2 2020 ongoing, PNCC MRZ District Plan advice (GM, AB)
  - 5.3 2020 ongoing PNCC Business Zone District Plan advice (AB)
  - 5.4 2015/16 Auckland Council Unitary Plan Residential section Advice and expert evidence for Auckland Council (GM)
  - 5.5 2015/16 Replacement Christchurch District Plan, advice and evidence on centres provisions, for Chch City Council (GM, AB)
  - 5.6 2016 MfE National Planning Template – development of urban design content (GM, with BML)
  - 5.7 2008-16 Urban design input into all aspects of PNCC’s rolling district plan review including implementing design assessment criteria for centres and multi-unit housing (GM)
  - 5.8 2011 Member of the RMA2 Urban task force advising the Minister for the Environment on RMA reform (GM)
  
- 6 WCC design guide consultancy
  - 6.1 2020 – Co-planned and co-facilitated WCC’s 2020 design guide workshops (GM)
  - 6.2 2006-08 Author of the updates of 11 of the 15 design guides currently in the plan including Central Area and Centres guides and Residential. Researcher and author of character area appendices (GM)
  - 6.3 1992-94 Author of half of the WCC’s first generation guides, including Multi-unit Housing, Thorndon Character area, Institutional Precincts and CPTED guides (GM)
  - 6.4 1994-23 extensive experience applying the design guides as professional design reviewers for WCC (currently reviewing major developments including One Tasman (1-23 Tasman Street) and Kate Sheppard Place), and as urban design advisors to applicants (GM, AB)

- 7 Authorship of other design guides
- 7.1 2019-23 MCZ, MUZ, LFRZ, LCZ and Residential design guides for Porirua City Council’s district plan (GM)
  - 7.2 2020 Draft housing design guide for MHUD (GM)
  - 7.3 2020 Palmerston North non-regulatory Residential Design Guide (AB)
  - 7.4 2018 America’s Cup buildings and public realm design Environment Court approved ‘Design Requirements’ (GM)
  - 7.5 2020-22 Bayswater Maritime Village Design Guide to control the design of a consented masterplan (GM)
  - 7.6 2016 Shelly Bay Design Guide to control the design of a consented masterplan (AB, GM)
  - 7.7 2012,13 Steering Group for the Auckland Design Manual (GM) and author of residential content for this (AB, GM)
  - 7.8 2011 Hobsonville Point Design Guide peer review (GM)
  - 7.9 2004 – CABE (UK) ‘Creating Successful Masterplans’ and updated 2008 (AB)
  - 7.10 2002 MfE Advice and peer review of ‘People + Places + Spaces: A design guide for urban New Zealand’. (GM)
  - 7.11 1999-2000 By Design (UK) urban design in the planning system: towards better practice (AB)
  - 7.12 1999 PNCC Elmira Avenue and Manapouri Crescent non-regulatory design guide; and 2003 review of its effectiveness (GM)
- 8 Design panel review and advice
- 8.1 2022 Chair of one and member of another of WCC’s trial urban design panel reviews (GM)
  - 8.2 2022-23 Co-Chair of Kāinga Ora’s national design review panel (AB)
  - 8.3 2020-23 Co-Chair of Kāinga Ora’s Wellington Design Review Panel Wellington (AB)
  - 8.4 2000-23 Chair since 2005 of WCC’s waterfront TAG (GM)
  - 8.5 2007-23 Founding and ongoing member of Eke Panuku Development Auckland’s TAG design review panel (GM)

- 8.6 2013-20 Member of Auckland Council's urban design panel (GM, AB)
  - 8.7 2011-23 Chair of the joint Nelson City/Tasman District Council urban design panel (GM)
  - 8.8 2019-23 Chair of the Wellington Company/WCC design panel for Shelly Bay (GM)
  - 8.9 2014 Chair of the TAG for the Canterbury Earthquake Memorial Project (GM)
  - 8.10 2013-14 Chair of the Heritage Advisory Team for the Christchurch Town Hall restoration (GM)
  - 8.11 2004-13 UK Government Commission for Architecture and the Built Environment (CABE) Design Review Panel and Built Environment Expert (AB)
  - 8.12 2011-13 London Bor. of Newham Design Review Panel (AB)
  - 8.13 2012-14 South East Regional Design Review Panel (AB)
- 9 We are involved in multiple city and town centre design projects, and design projects within centres including:
- 9.1 2021-23 Urban designers for two significant metropolitan centre spatial planning and redesign projects (GM, AB)
  - 9.2 2013-14 Co-lead consultants of the Christchurch Retail Precinct Plan for CERA (GM, AB)
  - 9.3 2018-23 Planning of four local centres in two growth areas for c 8,000 dwellings, for PNCC (AB)
  - 9.4 2015-16 20 Customhouse Quay high rise building development, urban design advice/report for Newcrest (GM)
  - 9.5 2014-15 Auckland's Commercial Bay, urban design review inputs and evidence for Precinct Properties (GM)
  - 9.6 2007-23 Eke Panuku Development Auckland urban design consultant for multiple local area planning projects and multiple building mixed use, commercial, apartment and hospitality projects including the AC36 America's Cup, Te Aratukutuku/Wynyard Point, 'Central Precinct', and the Park Hyatt hotel (GM)

10 Research, publication and University appointments include:

10.1 Graeme McIndoe

- 1992-2009 Senior lecturer at VUW's School of Architecture teaching urban and architectural design in a 0.5 permanent position
- 2011 Author MfE discussion document for a scoping study for a National Policy Statement on Urban Design
- 2005 Principal co-author of the MfE's *Urban Design Toolkit*
- 2005 Principal co-author of the MfE's *The Value of Urban Design: the economic, environmental and social benefits of urban design*
- 2002 Author for the MfE of *Shaping the Future: A National Policy for the Urban Environment*.
- 1996 Co-author with Baird, G., Gray, J., Isaacs, N., and Kernohan, D. of *Building Evaluation Techniques* (published by McGraw Hill, New York). Described systematic tools for building quality assessment.

10.2 Andrew Burns

- 2010-2011 Lecturer (part time) in Sustainable Urban Development at Oxford University
- (2007-2013) Lecturer (part time) in Urban Design at the Joint Centre for Urban Design, Oxford Brookes University
- 2004-2006 Studio Tutor and lecturer (part time) in Urban Design, University College London 2000 DTLR (UK) Good Practice Guide on Design in the Planning System (AB)
- 2004, 2008 CABE (UK) Creating Successful Masterplans (AB)
- 2002 Sustainable by Design, Paper delivered to the 5th Symposium of the International Urban Planning and Environment Association: Creating Sustainable Urban Environments, Christ Church, Oxford, UK

## **Code of conduct**

11 We have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. We have complied with the Code of Conduct in preparing this evidence and will continue to comply with it while giving oral evidence before the hearings panel. Except where we state that we rely on the evidence of another person, we confirm that the issues addressed in this statement of evidence are within our area of expertise, and we have not omitted to consider material facts known to us that might alter or detract from our expressed opinions.

## **SCOPE OF EVIDENCE**

12 We have identified in evidence the overarching themes and key points, including illustrative detail. Rather than restate the detailed points in our submission (**Appendix 1**) we refer to that as a whole as part of this evidence and where appropriate cross-reference relevant parts.

13 We have read the statements of evidence of Dr Farzad Zamani and Ms Shayna-Lucy Curle (both dated 1 March 2023) and refer to aspects of their statements throughout our evidence and in relation to Ms Curle's evidence on matters of detail, primarily in our **Appendix 2**.

14 Content:

### **Qualities and general approach to the design guides**

- Use of Statutory Design Guides
- Review and refinement of all design guides
- Repetition between design guides
- Inconsistency of expression between guides
- Coordination to eliminate overlap and unnecessary repetition
- Repetition within each design guide
- Numbering design outcomes-
- Clarity, precision and consistency of expression
- Cryptic, incomplete and varied expression

## **Context analysis**

### **City Outcomes Contribution**

- Shading, wind and visual dominance effects in the residential zones
- Rating City Outcomes Contribution
- Urban design panel review for City Outcomes assessment
- Detailed changes to content

### **Conclusions**

#### **Appendix 1**

- Our original submission which contains detailed analysis that we cross-reference in this evidence.

#### **Appendix 2**

- Table 2 Review of the Residential Design Guide from our submission on the proposed Residential Design Guide with additional content responding to the WCC response to our submission and the evidence of Ms Curle.

- 15 We have looked at all of the design guides but chosen to concentrate our analysis and comments on the two that we predict will be most commonly used, that is the *Residential Design Guide [RDG]* and the *Centres and Mixed Use Design Guide [CMUDG]*. This evidence covers both as they are inextricably interlinked. Also, in preparing this evidence we are commenting on the structure and content of each of these in relation to each other, and to the suite of guides as a whole. We also note that the RDG applies to residential activity in the centres and mixed use zones, hence these guides should also be considered in combination for both types of zone.
- 16 We have included examples of detailed critique of aspects of the content of both guides. These examples are illustrative and represent the types of issues which go right through the guides, and which are described in more detail in the attached submission.
- 17 We have reflected on the content of the design guide introduction and withdraw our submission (at point 6, page 2) that the introduction be removed from the design guide.



## QUALITIES OF AND GENERAL APPROACH TO THE DESIGN GUIDES

### **Use of statutory design guides**

- 18 We support the use of statutory design guides. Our experience of design guide/criteria production and implementation, informs our conclusion that statutory design guides which are within the district plan are more effective than advisory (non-regulatory) guides. Advisory design guides are in our experience not effective. This is simply because they are not required to be applied, or if they are referred to, they are given little or no weight.
- 19 However, for reasons identified in our submission, some of which are discussed in detail below, we consider that Council's full suite of proposed design guides requires re-conceptualisation, restructuring and significant edit. Without such modification we consider these are not fit for purpose and should not in be in the district plan.

### **Review and refinement of all design guides**

- 20 We reiterate Point 1 of our submission which was:
- We consider that considerable editing and tightening up is necessary to ensure the effectiveness and efficiency of the proposed suite of guides. They are currently much too long and unnecessarily complicated. Content also needs to re-assessed and edited. The suite of guides needs to be suitably comprehensive and effective, but also to the point and easy to use, an outcome which has yet to be achieved.*
- 21 Our full and detailed submission includes analysis of the entire suite of design guides and a detailed critique of both the RDG and CMUDG. That submission is appended to this evidence rather than repeated here. We address aspects of these matters with more detailed evidence below.

## Repetition between design guides

22 For residential in the city centre, both the RDG and CMUDG apply. We noted in our submission (refer to point 4, page 2) how a residential development (to which 137 guidelines apply) in the CMU zone (to which 97 guidelines apply) would be required to apply 237 guidelines. This is unnecessary and, in our opinion, seriously undermines the application of the guides and the efficiency of process. When the Heritage Design guide also applies, then the assessment of any residential project must reference and respond to 280 guidelines. In our opinion this unnecessary repetition is due partly to how the suite of guides is structured and partly to how content is covered within each guide.

23 As an indicative sample of overlap and repetition between guides, we have compared the first 15 guidelines in the RDG and CMUDG.

Design Issue	RDG	CMUDG	Observation on expression
Responding to the natural environment			
• Contextual analysis	G1	G1	Identical
• Cultural landscape	G2	G2	Identical
Vegetation and planting			
• Mitigating stormwater runoff	G4	G5	Almost identical
• Existing trees	G5	G4	Almost identical
• Overhanging trees	G6	G6	Almost identical
Urban ecology	G7	G8	Identical
Carbon reduction – natural environment			
• Orientation for solar access	G8	G9	Identical
• Cross-ventilation	G9	G11	Almost identical
• Specimen trees for shade	G10	G10	Identical
Designing with topography			
• Visible retaining walls	G11	G12	Same issue, expressed differently
• Stormwater runoff	G12	G15	Almost identical
• Tall retaining walls	G14	G13	Identical
• Integration with adjacent sites	G15	G14	Identical

*Table 1: Comparison of the first 15 guidelines in the ‘Residential’ and ‘Centres and Mixed Use’ design guides.*

24 In our experience of design and design review, unnecessary repetition of guidelines will contribute inefficiency and cost to the process with no potential benefit to the quality of outcome.

25 We note that it is only in the circumstances when more than one guide applies to a project or zone that this type of repetition is problematic.

When separate design guides apply exclusively to different zones, it is entirely appropriate that the same issues are dealt with using the same guidance.

### **Inconsistency of expression between guides**

- 26 Examination of the sample in Table 1 above also found unnecessary and inconsistency between the wording of guidelines. Considering the sample first 15 guidelines, Table 1 (above) records that 7 guidelines are identical, 5 are almost identical, and one addresses the same issue, but is expressed differently.
- 27 This unnecessary variation in the expression of guidelines covering precisely the same matter becomes problematic should both guides apply as that introduces ambiguity, grounds for unnecessary debate on the interpretation of multiple, slightly different guidelines and further compromises efficiency. There is also currently a need to assess both, and when there is variation, it becomes uncertain as to which of these should apply or take precedence.
- 28 A much greater level of consistency can and should be introduced to most of this sample, as there is no reason that most of the wording should not be identical. As a separate stylistic and editing consideration, guidelines covering the same matters should be in the same order in each section of the guides.
- 29 Efficiency in application and in fact 'streamlining' is recognised as desirable: *"The design outcomes and overarching design principles are used consistently across all design guides to streamline consideration where more than one design guide applies."* (RDG page 4.) This principle should also be applied to the design guidelines themselves. This is a simple editing matter. However, we maintain our opinion that for efficiency the guides should be re-structured so that applying two identical, or identical but differently worded guidelines to a single project, is completely avoided.

### **Coordination to avoid overlap and unnecessary repetition**

- 30 We disagree with Dr Zamani’s statement [evidence at 26] that for consistency and high-quality outcomes “*some of the design guides had to be repeated*”. It is possible by reconsidering the structure and content of the guides that all repetition between guides – that is repetition due to overlap when two or more design guides are applied to a single project within a single zone - can be avoided.
- 31 A readily achievable solution is to identify that content in the Residential Design Guide which is specific to the residential zone. For the sake of explanation that might be called ‘Part A’. The remaining part of the RDG which applies to housing design in both the Residential and CMU zones may, again simply for the sake of explanation be called Part B. Then both Parts A and B apply to all development in the Residential Zone, but only Part B of the RDG applies to residential development in the Centres and Mixed Use Zone. In this way all zone-specific content continues to be applied by the design guide for each zone and structurally-induced repetition is eliminated.
- 32 An approach similar to this has been used in the Porirua City Council’s suite of proposed guides to address the same issue of coordinating the guides to eliminate repetition of guidelines applying to any single project.
- 33 We consider the entire suite of design guides should be refined to address this matter, but this is a matter of communication design rather than content. Moreover, in our opinion it is many orders of magnitude more efficient to coordinate the content of the design guides prior to confirmation in the plan, than have to deal with unnecessary repetition in each of what would be hundreds if not thousands of applications over the life of the district plan. That would be unnecessarily costly and inefficient for both Council and applicants.

### **Repetition within each design guide**

- 34 We submitted (Point 7a pages 2 and 3) and reiterate the following:

*The degree of overlap and repetition makes the document unnecessarily long, unwieldy and inefficient to apply. Because a point is made multiple times may not necessarily lead to efficient application, and it could give undue and unintended over-emphasis to some design direction.*

35 Unnecessary repetition within each guide is a problem because it adds to the sheer number of guidelines in each design guide. To illustrate:

35.1 WCC's Proposed RDG has 22 outcomes + 137 guidelines. For comparison the Operative Residential Design Guide has 15 objectives + 67 guidelines. In comparison, Porirua City Council's proposed Residential Design Guide has 21 objectives and 36 guidelines for townhouse or apartment development.

35.2 The CMUDG has 22 outcomes and 97 guidelines. For comparison Wellington's operative Central Area Urban Design Guide has 14 design objectives and 43 guidelines. Porirua City's MCZ design guide (for direct comparison with WCC's proposed CMUDG excluding the section applying to housing design) has 12 objectives and 22 guidelines.

36 Examples of repetition within two of the guides are highlighted below particularly because WCC officers are recommending no material change to address this problem. From the RDG:

36.1 The four guidelines below all deal with bicycle storage with considerable overlap relating to location and size. These could readily and should be combined into one or at most two guidelines.

- *G99 For large developments, provide a secure weatherproof storage area external to the unit large enough to store a bicycle.*
- *G101 Where possible locate bicycle storage near to primary entrances for convenient access and to encourage usage.*

- *G102 Bicycle storage should accommodate electric bicycles (wall mounted racks are inappropriate for electric bicycles). Bicycle storage should also consider including spaces for larger bicycles and adaptable bicycles.*
- *G103 Bicycle storage areas should be accessible from the main entrance of the site. Consider ramps or bicycle stairways (steps including a side channel for bicycle movement).*

36.2 The two guidelines for storage and service rooms could and should be combined into one:

- *G104 Access to storage and service areas should have access control.*
- *G105 Storage and service rooms should be visible from the public, communal, or private spaces for passive surveillance.*

37 The following examples are from the CMUDG:

37.1 Through site links, the following should be combined:

- *G49 Retain and enhance existing publicly accessible pedestrian links through sites.*
- *G53 Create new publicly accessible links through a site as part of the site redevelopment where a link would enhance local pedestrian connectivity.*

37.2 Passive surveillance is required to be assessed twice:

- *G41 Design façades, balconies, bay windows, and corner windows in a way that articulates the external appearance of the building and increases surveillance of the street.*
- *G50 Place windows from occupied spaces to overlook pedestrian routes to ensure passive surveillance is achieved. This is especially important where movement*

*can be predicted, such as pathways to parking lots or garages.*

37.3 In relation to entrapment as a specific consideration in CPTED the following could be combined:

- *G51 Avoid entrapments and minimise blind corners along routes by providing good sightlines and alternative routes*
- *G52 Provide multiple exit points from any park, playground or otherwise enclosed areas in which people might be trapped*

37.4 Lighting as an aspect of CPTED addresses the same matter and should be combined:

- *G62 Illuminate potential night-time concealment and entrapment spaces.*
- *G63 Lighting must be consistent to avoid creating areas of shadow/darkness that could result in concealment,*

38 Ms Curle [at 33] proposes that “*separate guidelines ... provide the ability to identify and isolate design issues and direct applicants towards specific design outcomes.*” We do not agree. All nuances of design principle can be retained when very similar matters are combined into a single guideline. That is, the guidelines remain at least as effective, and are considerably more efficient.

39 Dr Zamani [at 28] acknowledges some repetition and states that it relates to the structure of the design guides and its relation to different scales of design attention. We agree on the merits of structuring a guide to relate to various scales of neighbourhood, site and building but note that this can readily be achieved without the need for any repetition. We also consider Dr Zamani’s rationale is contradicted by the examples identified above which are repetitive despite being numbered consecutively and/or from the same parts of the design guide. Therefore, there is much repetition which is not for the reason identified by Dr Zamani.

40 If the structure used for each design guide necessitates repetition to the degree that is found within, then in our opinion the structure is not fit for purpose. In our opinion that is the case with the RDG and CMUDG as currently proposed. Restructuring and careful editing to remove repetition would considerably simplify the guides and can be achieved with no loss of material content.

#### **Numbering design outcomes**

41 It is implied in the introduction to the RDG (page 4) that the design outcomes will be considered, however the 'Outcomes' are not numbered which hinders reference in assessment and reporting. If it is intended that these are to be referred to in assessment (as distinct from being the drivers behind the content of the guide) then they should be numbered.

#### **Clarity, precision and consistency of expression**

42 We consider that editing is necessary to polish the text of the guides to remove unnecessary variation and ambiguity.

42.1 Several examples where greater clarity is required are in relation to RDG G25 and G54, and CMUDG G82 (Refer to our Appendix 2).

42.2 Precision of expression is required. Several examples where further precision would be helpful are at RDG G50 and G110 (refer Appendix 2).

42.3 Consistency of expression is required both within and between guides, with that between guides discussed below.

43 Three examples are provided below, with variation between how an issue is covered differently by the CMU and RDG highlighted. This variation occurs notwithstanding that for residential in the CMU Zones both are proposed to apply to a project. We consider this contradiction to be problematic:



#### 43.1 Existing trees

- *Resi G5: Existing trees that contribute to local streetscape or public realm amenities should be retained and thoughtfully integrated into a new development. When a tree must be removed, it is recommended the tree is relocated on the site or a new native tree be planted in its place.*
- *CMU G4: Existing trees that contribute to local streetscape or public realm amenities should be retained and thoughtfully integrated into a new development. When a tree must be removed, the tree should be relocated on the site or a new native tree be planted in its place.*

#### 43.2 Trees overhanging the site

- *Resi G6: Trees located adjacent to the development, including overhanging the site or within the street front, should be retained.*
- *CMU G6: Where possible, trees that are located adjacent to the development, including overhanging the site or within the street front, need to be considered and retained.*

#### 43.3 Natural cross-ventilation

- *Resi G9 Dwellings should have natural cross ventilation by locating windows on opposing or corner sides of the unit. (a two dot guideline)*
- *CMU G11 Consider providing dwellings with natural cross ventilation by locating windows on opposing or corner sides of the unit. (a one dot guideline)*

#### 43.4 Retaining walls

- *Resi G11: Where retaining walls or large building support structures are necessary, provide a high-quality design*

*response that takes into account their visibility and formal composition.*

- *CMU G12: Large retaining walls visible from surrounding buildings and public spaces should be avoided. Where this can not be achieved, minimise and mitigate the wall's visibility and ensure a high visual quality outcome.*

The expression of guidelines should be consistent between guides or alternatively where difference is important, both guidelines should not apply to any project.

### **Cryptic, incomplete and varied expression**

44 In many cases as expressed the intended meaning of guidelines is insufficiently clear and unambiguous. That risks multiple unintended interpretations, unnecessary debate and dispute when these are applied.

45 For example, the Residential and CMU guides cover 'Architectural coherence'. We agree that this important concept must be included in the design guides. However as presented it is described incompletely, insufficient guidance on interpretation is given and it is treated differently in the RDG and CMU guides:

45.1 Architectural Coherence (CMU G82) is:

*Establish a coherent composition through integration with:*

- *Materials and detailing*
- *Setbacks*
- *Form and volume*
- *Façades*

The meaning of this is unhelpfully cryptic. It simply states some of the components of a building and gives no guidance on how architectural coherence will be assessed or what is meant by the concept.

45.2 Architectural coherence is covered with different wording in the RDG at G108:

*Ensure the design and composition of any building has an overall coherence that integrates all relevant design guide requirements in a coordinated way.*

46 G108 does give direction on what is meant by coherence. But the supporting explanation is not consistent with that direction. It describes instead relating to neighbourhood context; expressing individual units; and articulation of building bulk. The explanation does not identify how that might be achieved in an architecturally coherent and integrated way. Guideline G109 is misplaced under the heading of architectural coherence as it is about a sense of individual identity and address for each dwelling, not about architectural coherence. Editing is required.

47 The above is a further example of inconsistency between the guides which is problematic should both apply. To resolve, the architectural coherence guideline and all other cases like it throughout the guide need to be interrogated and modified to be clear as to intent and interpretation. Where a universal design concept is being referred to, the wording should be identical.

48 In our submission at 7c (page 3) we identified a need for consistency of expression of the guidelines. The following example of inconsistency is from the Residential Design Guide:

***Carbon reduction - natural environment***

*G8 Orientate buildings to maximise solar access to improve energy efficiency.*

*G9 Dwellings should have natural cross ventilation by locating windows on opposing or corner sides of the unit.*

49 Leading with an imperative verb, G8 directly instructs the reader about design intent. In contrast G9 is descriptive, describing an outcome but not specifically requiring action by the designer. Grammatically, each item in the list should follow the same construction. Only one approach should be used and the entire suite of guides should be edited to achieve this. Given the intent of the guides, in our opinion direct instruction is most appropriate.

50 Refining and editing guidelines is best completed before the suite of guides becomes operative as that avoids the complications of multiple

individual guidelines having to be interpreted and potentially debated with every resource consent design guide assessment. There will always be some debate in a design guide consent application, however it is most constructive that that should focus on those matters where debate assists in achieving better outcomes rather than on interpreting drafting.

## CONTEXT ANALYSIS

51 Good design is informed by understanding of context. However, the requirement in G1 for documenting context analysis is excessive and does not recognise the difference in scale between the small developments to which this applies. This degree of information is not necessary to ensure, as described in the introduction to the guides, that any development considers and responds appropriately to its existing context.<sup>1</sup>

52 Guideline G1 places a focus on the process and information requirements rather than the intended design outcome. Any requirement to present this information (as distinct from guidance to consider context) should be deleted entirely from the guide, as long as the guide addresses how a project should respond to various aspects of context, and it appears to do this.

53 Our submission in relation to G1 and G2 was:

*This includes two lists and multiple overlapping layers. A single, much tighter list should be used.*

*This level of detail which 'should' be included is much too detailed for some projects. This might be modified to be "...should include, where relevant, the following:"*

*The context analysis should be framed around the scope of the project.*

*This has an overwhelming focus on the existing context, and fails to recognise planned urban context and character.*

---

<sup>1</sup> Noted as an intention in the RDG, page 5

*This is thorough, but in relation to many of these matters leads to the question: "So what?"*

*When there is no specific requirement to respond to matters such as materials, finishes and textures, this would seem to be unnecessary detail.*

54 The scope of context analysis for a small development can be much narrower than G1 and G2. An analysis of the type required is expensive, inefficient and likely in most cases to offer little benefit. The quality of output that can be expected would be variable.

55 It is far better to place attention on successfully designing for context rather than describing context. In our opinion these guidelines should be deleted, and the relevant matters covered in guidelines addressing actual design response.<sup>2</sup> This would lead to a significant process cost saving.

## **CITY OUTCOMES CONTRIBUTION**

### **Shading, wind and visual dominance effects in the residential zones**

56 City Outcomes Contribution (RDG G137 and CMUDG G97) is addressed at point 9, pages 3 and 4 of our submission and we refer the Panel to the full text of that.

57 We are aware that the City Outcomes contribution is scheduled to be addressed in detail in Hearing Stream 4<sup>3</sup> relating to the Centres and Mixed Use zone. However, the additional building height facilitated by this mechanism has significant implications for the well-being of people in the Residential zones. Therefore, we consider the content of the City Outcomes mechanism should be considered in relation to outcomes in the residential zone.

---

<sup>2</sup> A proposed requirement for similarly detailed context analysis was deleted from Auckland's Unitary Plan including for the reasons we have identified.

<sup>3</sup> Evidence of Dr Zamani, at 23

58 As noted in our submission, the City Outcomes Contribution does not consider the outcomes and implications of height. Yet these implications are fundamental to whether the effects of any over-height project are acceptable. We have identified multiple matters to reconsider however one point we particularly wish to re-emphasise is:

*New, already permissive heights can be extended .....without reference to specific neighbour effects such as shading and visual domination, and in some instances wind.*

59 We consider that in the residential areas in particular, effects of shading, visual domination and wind of increased height buildings could be significant and that must be considered in assessment. With a maximum 'bonus' height of 50%, the height of a building in the 11m MRZ could be permitted to rise to 16.5m which in many cases would allow a five storey building that would be anything between one and a half and five times as high as the buildings around. Such a disjunct in height risks the effects we have identified.

60 The absence of consideration of shading effects of over-height buildings also contradicts RDG G8 "*Oriente buildings to maximise solar access to improve energy efficiency.*" Therefore, while one part of the design guide seeks to maximise solar access on site, it is silent on the effects on solar access off-site. That is by definition inconsistent with achieving positive 'City Outcomes'.

61 We consider that, with the additional residential development potential already enabled by the MDRS and WCC's proposed zoning changes, this additional avenue for building intensity without consideration of the potential and actual effects of increased building height is seriously flawed.

62 In addition to addressing other matters we have identified, should the City Outcomes mechanism be retained in some form in the district plan, we consider that these additional matters should be integrated into assessment. Otherwise, the 'City Outcomes' will include unreasonable and unexpected shading to neighbouring dwellings with consequent appreciable compromises to health and well-being; poor visual

outcomes; and wind-driven amenity and possible safety compromises to ground level public space.

### **Rating City Outcomes Contribution**

63 Rating of points is uncertain as beyond identifying a 1-10 range no rating scale is provided for calculating points in six areas. These are accessible public open space, through block connection, communal gardens/playgrounds and roof gardens, adaptive reuse, embodied carbon, and urban design panel approval.<sup>4</sup> We note that Dr Zamani [at 22] identifies that measurement of certain indicators is to be clarified, and we support that.

### **Urban design panel review for City Outcomes assessment**

64 Referring to urban design panel review in the City Outcomes Contribution is problematic as while there have been a number of trial panel sessions, there is no Urban Design Panel in place yet. Dr Zamani [Evidence, at 24] confirms that there is no panel in operation, and in his view “should not be included in the planning framework.” We agree. That notwithstanding, we consider that once established a properly constituted urban design panel can provide valuable independent expert design review to the consent process. We also consider that a panel could usefully contribute to City Outcomes Contribution assessment.

65 However, an urban design panel review session which usually allows around three hours is insufficient scope and time to assess “the development’s response to all the design guides as decided by the panel.” While an urban design panel must be cognisant of the District Plan controls that apply, in our experience of panel reviews, it has not been the role of any panel to undertake that form of detailed assessment. Neither would it be possible for a panel to do so.

---

<sup>4</sup> We note that Dr Zamani [Evidence, at 21, 22] recommends further amendments to the City Outcomes Contribution mechanism including clarifying measurement of indicators, and that these will be addressed in Hearings Stream 4.

## Detailed changes to content

66 We have gone through the guides in detail in our submission and identified a number of examples where we consider change to the content of a guideline is necessary. In relation to the RDG these are identified in Appendix 2. Our concerns are not limited to these examples.

67 On a specific matter of detail, Ms Curle [at 32] covers a point of detail in relation to household appliance heights: *“...there is a lack of guidance about the placement of household appliances at accessible heights in the residential design guide and it would be in my view practical to include guidance on this in the design guides.”*

68 We disagree. That level of detail would require the kitchen and service rooms of all units to be designed and described and measured to show compliance. That level of detail is unnecessary at this early stage of the project design and delivery process. Instead, where an ‘Accessible unit’ is provided, the floor plans provided for resource consent can show where the major appliances are and can be dimensioned to demonstrate that the floor space necessary for ‘accessibility’ is available. Detailed joinery design can happen later.

## CONCLUSIONS

69 It is important that design quality is addressed, and design guides are a useful means of doing this.

70 The guides in the proposed suite are flawed in structure and expression and are unnecessarily inefficient. Because of this, while in our opinion the scope of the content is (with identified exceptions) more or less appropriate, they are currently not fit for purpose.

71 The RDG should be restructured to coordinate with the CMUDG to eliminate repetition of overlapping guidelines when the RDG is applied in the CMU zones.

72 Editing is required to remove unnecessary content and repetition within the RDG (and also the CMUDG) and achieve consistency of



expression of guidelines within and also between these guides where that is important. Some guidelines should be rewritten to address potential flaws as identified. Only after such refinement might these guides become fit for purpose.

73 If these issues are not refined to eliminate the identified problems of coordination repetition and expression, they will impose unnecessary process complication and inefficiency for every project to which they apply.

74 It is many orders of magnitude more efficient to coordinate the content of the design guides prior to confirmation in the plan, than have to deal with unnecessary repetition in each of what would be hundreds if not thousands of applications over the life of the district plan.

75 Attached as part of this evidence:

**Appendix 1:**

McIndoe Urban Submission on the WCC Proposed District Plan Design Guides\_9 September 2022

**Appendix 2**

Table 2: Review of the Residential Design Guide 14 March 2023



Graeme McIndoe  
16 March 2023



Andrew Burns  
16 March 2023

## Appendix 1

### to the Urban Design Evidence of Graeme McIndoe and Andrew Burns

Table 2 has been removed from the end of this submission and is now included, with additional text, as Appendix 2 to our evidence.

## Submission on the WCC Proposed District Plan Design Guides

Submission by McIndoe Urban Ltd

Graeme McIndoe, Architect and Urban Designer, Director  
*FNZIA, MA Urban Design, BArch(Hons), BBSc.*

Andrew Burns, Urban Designer, Director  
*MRTPI, FRSA, MA Urban Design (Dist), BArch, BBSc.*

Date 9 September 2022

### INTRODUCTION

We are Wellington based specialist urban designers with intensive and ongoing professional experience of design guide authorship and implementation since 1992. Our work includes authorship of the suite of design guides in Wellington's Operative District Plan, the design guides for Porirua City's Proposed District Plan, Assessment Criteria for Palmerston North City Council, lead authorship of the residential sections of the Auckland Design Manual and being Auckland Council's urban design expert for the residential sections of the Auckland Unitary Plan through the hearings process. We collectively have 60 years of professional design review experience including in Auckland, Palmerston North, Wellington and Nelson cities, and we both chair and are members of multiple urban design panels.

### GENERAL SUBMISSION POINTS

#### 1. The following comments apply to all guides

We consider that considerable editing and tightening up is necessary to ensure the effectiveness and efficiency of the proposed suite of guides. They are currently much too long and unnecessarily complicated. Content also needs to be re-assessed and edited. The suite of guides needs to be suitably comprehensive and effective, but also to the point and easy to use, an outcome which has yet to be achieved. Key matters that should be addressed are identified below.

#### 2. General refinement of all guides

The detailed comments on the Design Guide Centres and Mixed Use (in table 1 below) indicate the level of refinement and matters that should be refined that should apply to all guides. Some general matters include

- Eliminating repetition and ensuring consistent expression of guidelines (as detailed below)
- removing any reference to detailed technical requirements which are a given and are assessed by other technical and/or expert processes. Examples of this include G53 in the Subdivision guide relating to high voltage transmission lines and G33 in the Residential guide relating to the design of hoardings.

**Our submission:** Take into account our detailed review of the *Design Guide Centres and Mixed Use* (as described in Table 1 below) and *Design Guide Residential* (table 2) and also apply the same level of scrutiny and refinement to all guides.

### 3. Coordination between guides to ensure efficiency

The guides overlap, so assessments will be required to cover both. While “*the design outcomes and overarching design principles are used consistently across all design guides to streamline consideration where more than one design guide applies*” this will lead to unnecessary complication, particularly when repeated over multiple sites.

While the full guide may be relevant to major projects in the City Centre zone, its application may be overly onerous in small developments in local neighbourhood centres, particularly where the scheme includes residential. For example, an addition of retail or commercial space to an existing building, with say 3 apartments above on a small site would require application of 234 guidelines, that is, 97 in the Centres guide and 137 in the Residential Guide. Many of these overlap, but as they all apply that would need to be recognised and covered off in some way in detailed assessment. From a process perspective this is not fit for purpose, being both unnecessarily onerous and inefficient for all involved in the project.

**Our submission:** Restructure and coordinate the entire suite of design guides to remove unnecessary overlap and repetition between guides.

### 4. Departure from guidelines

A mechanism for departure from guidelines is not provided for. How will that be assessed? For example the Operative suite of guides includes a mechanism including reference back to objectives which identify the outcomes that are to be achieved.

**Our submission:** Include a mechanism for departure from guidelines which should be tied into identified, relevant and numbered objectives or outcomes.

### 5. Outcomes

The outcomes are identified as being part of this statutory document, and that they must be met. As they are relevant to design guide assessment they should be numbered to allow cross reference in assessments. We also note that the same set of outcomes appears in each of the guides, in addition to the 16 page Introduction to the Guides. This is unnecessary repetition and has the effect of bloating the suite of guides.

**Our submission:** Number the ‘outcomes’ in each guide and integrate with relevant section / guidelines to avoid constant flipping back and forth.

### 6. Design Guide Introduction

The function of the Design Guide Introduction is not clear, other than providing the rationale for the approach taken through the suite of guides. If that is the case, it is useful information for this process of explaining and implementing a new set of guides. But it does not and need to be and should not be within the set of statutory design guides.

**Our submission:** Remove the Design Guide Introduction document from the District Plan.

### 7. Expression of content

- a. Repetition should be eliminated

The degree of overlap and repetition makes the document unnecessarily long, unwieldy and inefficient to apply. Because a point is made multiple times may not necessarily lead to efficient application, and it could give undue and unintended over-emphasis to some design direction. This would allow the design guides to be materially shortened without loss of content, and the task of applying them made considerably more efficient.

- b. In many cases a matter is dealt with in a section by multiple guidelines, when it would be equally effective and more efficient to combine into a reduced number of guidelines. An example is Residential GG99, G101 and G102.
- c. Consistency in expression is required  
The guidelines should be edited to ensure consistency of expression. Many are directive such as maintain visual connection..., Orientate building frontages ....; Use planting to..... But others are passive descriptive statements. The approach of being directive is preferred as it will enhance legibility and it will also allow the text to be shortened.

**Our submission:** Restructure the content to eliminate repetition within individual design guides and edit to ensure consistency of expression of guidelines.

#### **8. Level of detail and appropriateness at the time of design review for resource consent**

The guides inappropriately combine good practice in detailed building design, specification and construction which are properly covered at the time of building consent with issues which relate to the design, configuration and amenity effects of the building. Those matters should be stripped out as they require a level of detail that is inappropriate to develop and provide before resource consent is granted. That is due to the cost of providing that information in a situation where it may be quite uncertain whether a consent can/will be achieved.

**Our submission:** Eliminate requirements for detailed information on construction, materials, services that is only reasonably developed following receipt of resource consent.

#### **9. City Outcomes G97(Centres and Mixed Use) and G137 (Residential)**

An interesting methodology, but there are many issues to be addressed for this to be effective and/or suitably responsive to context and the effects that may arise with 'over height' buildings. Fundamental issues include:

- a. This is of such significance and importance that it should not be included as a single guideline, or necessarily in the design guides. As this is a quantitative assessment, it is better placed as a District Plan standard or policy.
- b. Applying this Guideline requires full assessment of a range of detailed information including that on materials, building systems and services and structure that is unlikely to be provided in resource consent documentation, but which is provided in building consent documents. This assessment is out of place in the design review process for resource consent. Examples include Lifemark or Green Star/Home Star assessment; Seismic resilience – detailed structural system; reduction in embodied carbon requires detailed analysis of construction, materials; construction methodology and services design, all of which are matters which may not have been described at this point. Furthermore, it is too onerous to require this degree of information at the resource consent stage where there is uncertainty and significant risk of not achieving consent.

- c. There will be circumstances where some identified public good outcome such as through site links or public toilets will not be acceptable. The rating scale should therefore begin at 0 to accommodate those situations. Furthermore, as was the case when similar ‘incentive zoning’ was in use in Wellington, the system can be expected to be played by some hard-nosed developers to gain additional height by providing features and amenities which offer no material benefit in a particular situation, but which must be recognised because they are set out in the District Plan
- d. Roof and communal gardens should be tied to provision for their management. The 1970s/early 1980s plot ratio bonus standard for building which gave a bonus to the area of green space on buildings failed, as the various planters and roof gardens were not maintained, in most cases no provision was made for maintenance. The failed outcomes of that policy can still be found through the city.
- e. It is unreasonable to expect an Urban Design Panel to undertake a full assessment of a proposal relative to the 97 guidelines in a comprehensive document such as this. Design guide assessment is undertaken by the applicant, and by Council’s urban designer. There is no time in an urban design panel session to do that when for example the Residential Guide has 134 guidelines. Furthermore that would be inefficient use of a panel’s expertise and time. That wording should be reconsidered.
- f. The text allows for a way to exceed maximum permitted height throughout residential areas without public or neighbour involvement.
  - New, already permissive heights can be extended without involvement from the neighbours that will be affected by that, or without reference to specific neighbour effects such as shading and visual domination, and in some instances wind.
  - This gives an enormous degree of power to the urban design assessor and uncertainty for neighbours, without the tests and checks and balances related to the effects of height that should apply.
  - This may not be a significant matter in the City Centre Zone, but becomes important in the Local and Neighbourhood Centre Zones and the Mixed Use zone. It is critically important in all Residential Zones, both High Density and Medium Density.
  - The possibility of height extension by the City Outcomes mechanism should be removed from the Residential Zones and moderated in the LCZ and NCZ and MUZ with additional criteria.
- g. Text leads to confusion as to which ‘outcomes are being referred to. *“Developments that are .....do not need to meet the outcomes, however they need to satisfy the relevant guidelines in this guide.”* This appears to relate to refer to the ‘outcomes’ identified in Table 3 of Guideline G97 (Centres) G137 (residential), but by using that term there is ambiguity with the ‘outcomes’ at the front end of the guide.

***Our submission:***

- Remove the City Outcomes section from the design guides;
- Reconsider the extent of scope to increase height and public/neighbour involvement in that, and remove possibility for height to extend above the permitted envelope to be delivered using this mechanism in the residential zones;

- Test and verify the workability and effectiveness of the methodology; and
- Refine content with consideration of the matters identified above.

## 10. Subdivision Design Guide

The guide contains a lot of detail that will not be relevant to many small subdivision applications. Different types and scales of subdivision should be identified and a mechanism should be introduced to identify which guidelines apply to each type and scale of subdivision, if this is not already present in the Proposed District Plan. This is to avoid unnecessary inefficiency in minor subdivision projects such as subdividing a single lot.

**Our submission:** Identify different types and scales of subdivision and introduce a mechanism to identify which guidelines apply to each type and scale of subdivision.

## DETAILED REVIEW OF CENTRES AND RESIDENTIAL GUIDES

**Table 1: Review of the Design Guide Centres and Mixed Use.**

	Centres and Mixed use: Selected design guide content	Comment and/or recommendation
	<b>Responding to whakapapa of place</b>	This is under the broad title of 'Responding to the natural environment', yet many of the matters addressed are responses to the cultural and built environment. The title would be better as 'Responding to context'.
G1.	<ul style="list-style-type: none"> <li>• • • Prepare a contextual analysis that depicts how the development proposal positively contributes to the surrounding area. Contextual analysis should include the following:               <ul style="list-style-type: none"> <li>» Natural environment</li> <li>» Cultural context</li> <li>» Te Ao Māori</li> <li>» Heritage context</li> <li>» Streetscape</li> <li>» Movement</li> <li>» Site characteristics</li> <li>» Built form</li> <li>» Land use</li> <li>» Urban structure</li> <li>» Opportunities and constraints</li> </ul> </li> </ul> <p><i>Such analysis needs to contain an assessment of:</i></p> <ul style="list-style-type: none"> <li>– Block sizes/grain</li> <li>– Frontage widths</li> <li>– Spaces between buildings (side yards)</li> <li>– Connections to parks, reserves and public spaces</li> </ul>	<p>This includes two lists and multiple overlapping layers. A single, much tighter list should be used.</p> <p>This level of detail which 'should' be included is much too detailed for some projects. This might be modified to be "...should include, <u>where relevant</u>, the following:"</p> <p>The context analysis should be framed around the scope of the project.</p> <p>This has an overwhelming focus on the existing context, and fails to recognise planned urban context and character.</p> <p>This is thorough, but in relation to many of these matters leads to the question: "So what?"</p> <p>When there is no specific requirement to respond to matters such as materials, finishes and textures, this would seem to be unnecessary detail.</p>

<b>Centres and Mixed use: Selected design guide content</b>	<b>Comment and/or recommendation</b>
<ul style="list-style-type: none"> <li>– Alignment of key elevation lines (including roofs, cornices, parapets, verandahs and floor lines)</li> <li>– Orientation to the street</li> <li>– Landform</li> <li>– Existing and local vegetation scale and type</li> <li>– Materials, finishes and textures</li> </ul>	
<p>G2</p> <ul style="list-style-type: none"> <li>• • • Identify and respond to the natural and cultural landscape within and surrounding the site, including but not limited to: <ul style="list-style-type: none"> <li>» Māori sites of significance and their traditional uses.</li> <li>» Identified view shafts to maunga and awa/moana of significance to mana whenua.</li> <li>» Native vegetation and planting.</li> <li>» Scheduled heritage places.</li> </ul> </li> </ul>	<p>Repeats G1 Should be integrated with G1</p>
<p>G3</p> <ul style="list-style-type: none"> <li>• • • Utilise planting in conjunction with site layout and architecture to enhance the amenity and public realm interface of a development.</li> </ul>	<p>There will be situations in these centres, for example along the edge of the Golden Mile, where planting at the public realm interface is problematic, yet this guideline is considered essential.</p> <p>Overemphasis on planting in centres, where it may be inappropriate within the private realm along a retail</p>
<b>Carbon reduction-the natural environment</b>	
<p>G11.</p> <ul style="list-style-type: none"> <li>• Consider providing dwellings with natural cross ventilation by locating windows on opposing or corner sides of the unit.</li> </ul>	<p>Sound in principle, but already covered by the residential guide? Here may also be challenges in relying on natural ventilation in a noisy central city context, unless there are very strict controls on external noise after hours.</p>
<b>Designing with topography</b>	
	<p>G12 and G13 say more or less the same thing and could be combined to avoid unnecessary repetition in assessment.</p>
<p>G14.</p> <ul style="list-style-type: none"> <li>• • Site levels should achieve sensitive integration with adjacent sites.</li> </ul>	<p>While this can't be disagreed with in principle, it is too vague as a direction. What is sensitive integration of site levels with adjacent sites, and who defines it.</p>
<p>G15.</p> <ul style="list-style-type: none"> <li>• Stormwater runoff should be mitigated when modifying topography and landform of a site.</li> </ul>	<p>This is covered by WCC standards. It's a given and does not need to be stated in the guide.</p>
<b>Designing with water</b>	
	<p>There is unnecessary repetition that will lead to multiple assessments and inefficiencies. Matters relating to water is covered in three sections, G5 (vegetation and planting), G15</p>

<b>Centres and Mixed use: Selected design guide content</b>		<b>Comment and/or recommendation</b>
		(designing with topography) and G16 and G17 (designing with water)
G19.	<ul style="list-style-type: none"> <li>Where possible, protect and enhance existing native bush and significant trees on-site.</li> </ul>	This repeats/overlaps with G2, G4 and G8
<b>Ground floor interface and frontage</b>		
G20.	<ul style="list-style-type: none"> <li>Development must be designed to positively contribute to the adjacent street's amenity, vibrancy, and safety.</li> </ul>	While sound as an objective, this risks being overly broad as a guideline as it can be taken to mean many different things.
G22.	<ul style="list-style-type: none"> <li>Ensure the site layout orientates residential units to face either the public space, the street, or communal open space of the development to avoid side facing buildings.</li> </ul>	While this guideline is sound, the diagrams are questionable. There are circumstances where mid-block spaces don't need to be overlooked to the extent shown. And the diagrams show entrances on some facades and not others. This may be seen as arbitrary.
G28.	<ul style="list-style-type: none"> <li>Consider the scale of adjacent heritage buildings and areas in the design. <i>Adopt street wall heights, upper-level setbacks and appropriate building separation to respond to the scale of adjacent heritage buildings and contributing buildings to heritage areas.</i></li> </ul>	The methods identified under this guideline may be unnecessary in some instances, and unnecessarily onerous in others.
<b>Passive surveillance</b>		
G31.	<ul style="list-style-type: none"> <li>Maintain visual connections between building interiors and the public realm to ensure passive surveillance is achieved.</li> </ul>	Repetition should be eliminated. Passive surveillance is already covered by G21, and then is covered again by G41 and G50
<b>Massing and scale</b>		
G33.	<ul style="list-style-type: none"> <li>Provide an appropriate transition within new developments to improve sunlight and daylight into the surrounding open space.</li> </ul>	This is too open and undefined. What is meant by an appropriate transition, that is, what is the principle to be followed. definition. The types of open space need to be defined. In addition, if sunlight protection is desirable, that should be addressed as a rule.
G35.	<ul style="list-style-type: none"> <li>Provide safe and convenient pedestrian access from footpaths to the entry of buildings. Especially on street edges where footpaths do not currently exist, design as if a footpath will be extended across the frontage of the development</li> </ul>	That is contrary to design in context and could lead to arbitrary outcomes.
<b>Facades</b>		
G42.	<ul style="list-style-type: none"> <li>Where buildings are experienced at close range by the public, they should feature appropriately scaled texture, openings or</li> </ul>	



<b>Centres and Mixed use: Selected design guide content</b>	<b>Comment and/or recommendation</b>
other forms of façade articulation to ensure they contribute positively to the amenity and human scale of the public realm.	
<p><b>Roofscape</b></p> <p>G45. ••• Create visual interest in roofscapes viewed from elevated sites or are otherwise prominent. <i>This can be achieved through:</i> – Modulation – Colour – Materials</p>	The methods identified here in italics are undefined, and also open the opportunity for use of ineffective methods.
G46. ••• Place particular emphasis on the design and appearance of building tops which are prominent in views across the neighbourhood/city.	Repeats G45
G47. ••• Design and modulate parapets and the rooflines to create an attractive and contextually sensitive built form.	As above. These three guidelines should be rolled into one.
<b>Connections for people</b>	The five guidelines here should be compressed into fewer.
G49. ••• Retain and enhance existing publicly accessible pedestrian links through sites.	G49 and G53 could be combined into a single guideline.
G50. ••• Place windows from occupied spaces to overlook pedestrian routes to ensure passive surveillance is achieved. This is especially important where movement can be predicted, such as pathways to parking lots or garages.	Passive surveillance is covered in multiple guidelines. This should be rationalised to be covered only once.
G51. ••• Avoid entrapments and minimise blind corners along routes by providing good sightlines and alternative routes	Should be worded to ‘avoid opportunity for entrapment’. G51 and G52 might be combined.
G52. ••• Provide multiple exit points from any park, playground or otherwise enclosed areas in which people might be trapped	
G53. ••• Create new publicly accessible links through a site as part of the site redevelopment where a link would enhance local pedestrian connectivity. <i>Ensure connections are of high quality, and include:</i> – Clear, straight sightlines to the spaces beyond them – Viewshafts to maunga and awa of importance to local iwi where possible – Wide footpaths	Recommend combine with G49.  As a mandatory requirement,  Requires review of lighting – a detail that should be covered later?  To give certainty, this should better identify the situations where pedestrian connectivity is enhanced.

<b>Centres and Mixed use: Selected design guide content</b>		<b>Comment and/or recommendation</b>
<ul style="list-style-type: none"> <li>– <i>Quality landscape treatment</i></li> <li>– <i>Lighting</i></li> <li>– <i>At least one active frontage</i></li> <li>– <i>Public artwork</i></li> </ul>		
<b>Car parking and service vehicles</b>		
G55.	<ul style="list-style-type: none"> <li>• • • Car parking must not be located at the street front</li> </ul>	While this is sound in principle, there may be instances in a centre or mixed use area where it is acceptable to have a carpark, subject to appropriate façade design located at upper levels and extending to the street edge. That should be acknowledged but is precluded by this guideline and the related illustration.
<b>Lighting</b>		This is a matter of detail that is generally and can be covered by standards, and referred to in conditions of consent.
G62.	<ul style="list-style-type: none"> <li>• • • Illuminate potential night-time concealment and entrapment spaces.</li> </ul>	G62 and G63 address the same matter and should be combined.
G63.	<ul style="list-style-type: none"> <li>• • • Lighting must be consistent to avoid creating areas of shadow/darkness that could result in concealment,</li> </ul>	
<b>Open and communal space</b>		G70 identifies a list of five matters that need to be considered. G71 and G73 are matters of the same order and should be included in that list.
G72.	<ul style="list-style-type: none"> <li>• Where possible provide communal spaces for social interaction and outdoor activities. Especially in more significant developments or where private outdoor living spaces are insufficient for people to meet their everyday needs.</li> </ul>	This focus only on outdoor space omits consideration of the shared communal facilities that are a useful feature of build-to-rent and other emerging apartment developments. The content should be modified to recognise that. (Also the text needs to be edited.)
<b>Servicing</b>		
G77.	<ul style="list-style-type: none"> <li>• • • Carpark ventilation must not be directed onto the street, where it may negatively affect the quality of the pedestrian environment.</li> </ul>	The wording of this is ambiguous. Precluding any ventilation to/from the street is unnecessarily restrictive.
G78.	<ul style="list-style-type: none"> <li>• • Where possible and where required, include loading bays and drop-off points for supplies and deliveries on site whilst addressing any potential negative impact on the streetscape.</li> </ul>	By including ‘where possible’ this could have severe negative effects on site use and particularly on small narrow lots in centres and mixed use zones. The guidelines should instead focus on how such facilities are provided where these are ‘required’ in order to avoid adverse effects on the street environment, rather than

Centres and Mixed use: Selected design guide content	Comment and/or recommendation
<p><b>Architectural coherence</b></p> <p>G82. • • • Establish a coherent composition through integration with:</p> <ul style="list-style-type: none"> <li>» Materials and detailing</li> <li>» Setbacks</li> <li>» Form and volume</li> <li>» Façades</li> </ul>	<p>encouraging on site vehicle access of the type.</p> <p>This is an important guideline, and essential fundamental to achieving outcomes that are more than an assemblage of uncoordinated response to a range of guidelines.</p> <p>As currently worded it is vague and reads as a list of the components of the building.</p> <p>This matter is alluded to in the wind guideline, G81, with highlighted text: “Provide appropriate solutions to mitigate any impacts of the development on wind or micro-climate within and beyond the site that are functional and do not <u>compromise the coherence and compositional integrity of the building.</u>” That underlined text identifies the quality that is required, and is a helpful cue as to how this could be amended.</p>
<p><b>Seismic bracing/strengthening</b></p> <p>G87. • • Integrate seismic bracing/strengthening with the architectural composition of the existing building and, where possible, avoid having seismic bracing visible through windows on elevations facing the public realm.</p>	<p>This is unsound. It precludes the diagrid buildings which are a feature of innovative contemporary structural and architectural design in Wellington.</p> <p>Furthermore, in an earthquake prone city, as has been found in Christchurch, expression of the strength of a building can be structurally efficient, psychologically comforting and architecturally viable.</p>
<p>G88. • • The installation of exoskeletons, external columns, and external bracing elements for existing buildings is discouraged, particularly where these would:</p> <ul style="list-style-type: none"> <li>» Be located in the airspace or on land that is beyond the site boundaries.</li> <li>» Be visually dominant in relation to the existing building’s scale, form, proportions, or materials.</li> <li>» Restrict access for cleaning and maintenance.</li> </ul>	<p>Theses should not be precluded, as they may be the only way of saving some otherwise unsound buildings. There are also examples of how this can be successfully achieved.</p> <p>This should be turned around to identify the qualities that are required should this approach be taken.</p>
<p><b>Adaptability</b></p> <p>G89. • It is recommended that the façade, structure, and spatial design of a building should allow for conversion to other uses over time. Consider the following enablers of adaptability over the life of the building:</p>	

Centres and Mixed use: Selected design guide content	Comment and/or recommendation
<ul style="list-style-type: none"> <li>» Floor to ceiling height</li> <li>» Street frontage</li> <li>» Servicing</li> <li>» Dedicated goods lifts</li> </ul>	
<p><b>Compatibility of uses (Mixed Use)</b></p> <p>G90. • • Mixed-use developments should consider the compatibility of uses and be designed to:</p> <ul style="list-style-type: none"> <li>» Address and balance the specific needs of each user group (residents, workers, visitors), including operating times and spatial allocation to each use.</li> <li>» Arrange the development clearly and legibly, so it is safe and comfortable for everyone at any time.</li> <li>» Provide each use within a building with its own entrance, making public and private entrances separate and distinguishable.</li> </ul>	<p>While this guideline is sound in principle, the second bullet is vague and undefined, reading as a ‘motherhood and apple pie’ statement.</p>
<p>G91. • For developments that are likely to be occupied by people with limited mobility, where possible, provide ground level access that is accessible by people using wheelchairs, and design units with reference to New Zealand standards for access and mobility.</p> <p><i>Consider things such as:</i></p> <ul style="list-style-type: none"> <li>– <i>Lever handles on all doors</i></li> <li>– <i>Easy to reach window sills, power sockets and light switches</i></li> <li>– <i>Sufficient space to access storage spaces including wardrobes</i></li> <li>– <i>Ensuring flush levels between rooms, at entryways, and shower access</i></li> <li>– <i>Ensuring smoke alarms have both visual and audible alerts</i></li> <li>– <i>Best practice guidance for accessible kitchen, laundry and bathroom design</i></li> <li>– <i>Best practice standards for signage legibility and colour contrast</i></li> </ul>	<p>The italicised bullets under this guideline address a level of detail that is not provided and should not be necessary at the time of resource consent. They should be deleted.</p>
<p><b>Carbon reduction - buildings</b></p> <p>G93. • Where possible, new developments should:</p> <ul style="list-style-type: none"> <li>» Select low carbon and carbon banking materials.</li> <li>» Specify locally sourced/manufactured materials (reducing travel/shipping distances).</li> <li>» Utilise low energy fittings.</li> <li>» Install insulation over and above minimum requirements.</li> </ul>	<p>A level of detail that is unlikely to be known or assessed at the time of resource consent.</p>
<b>Waste reduction</b>	

	<b>Centres and Mixed use: Selected design guide content</b>	<b>Comment and/or recommendation</b>
G95.	<ul style="list-style-type: none"> <li>• Consider re-use of recycled materials for new developments.</li> </ul>	G95 and G96 are sound in principle but relating to matters of specification and construction methodology are more properly addressed at the time of building consent. They should be deleted from the guide.
G96.	<ul style="list-style-type: none"> <li>• Consider the end of life processes for proposed materials and how they can be recycled/reused.</li> </ul>	
G97	<b>City outcomes contribution</b>	See detailed comments at top of this submission.

## **Table 2 Review of the Design Guide Residential**

Note: Table 2 has been removed from the end of this submission and is now included, with additional text, as Appendix 2.

END

## Appendix 2

### to the Urban Design Evidence of Graeme McIndoe and Andrew Burns

#### Table 2 Review of the Residential Design Guide

This is table 2 from our 19 September Submission with our evidence in response to the Officer’s Recommendation and Ms Curle’s evidence in an additional column with text in blue font.

Any text in blue font in the middle column below is additional to our submitted Table 2 and is for ease of reference. It is extracted from either our submission or from the design guide.

Residential: Selected design guide content	Comment and/or recommendation	Evidence
<b>Responding to Whakapapa of place G1 and G2</b>	<p>See comment for centres design guide in relation to these guidelines.</p> <p>For reference, part extracts from our submission are:  <i>This is under the broad title of ‘Responding to the natural environment’, yet many of the matters addressed are responses to the cultural and built environment. The title would be better as ‘Responding to context’.</i></p> <p><i>This includes two lists and multiple overlapping layers. A single, much tighter list should be used.</i></p>	<p>G1: WCC Reject No change to title.</p> <p>G1: WCC Accept in part: and change to include “<i>where relevant</i>”            This is helpful.</p> <p>G1: WCC rec: No change            We consider that this, which is an information requirement, is unnecessary as the proof of a sensitive response to context will be in the design, and the information required remains onerous for small projects.            However, if a requirement for such material describing existing context were to be retained, we reconfirm that combining two lists of information requirements into one and including simple editing is necessary to simplify the guideline and its interpretation.</p>
<b>Vegetation and planting, Urban Ecology, and Carbon-reduction – natural environment</b>	<p>The content of this should be rationalised as trees and landscaping are covered under all three headings.</p>	<p>WCC Reject, No change</p> <p>G5, G6 and G7 in particular overlap and could be simplified into a reduced number of guidelines. That might mean that</p>

Residential: Selected design guide content	Comment and/or recommendation	Evidence
<p><b>Designing with topography</b></p> <p>G12. • • • When changing the topography and landform of a site, mitigate the effects of stormwater runoff.</p>	<p>G12 is better located in the stormwater section.</p>	<p>the heading ‘Urban Ecology’ is without any content. It appears as an example of the chosen structure (as explained by Dr Zamani) leading to a need to ‘populate’ each section and consequently to unnecessary repetition of content. Furthermore, G20 which is to protect and enhance existing bush and significant trees overlaps with G5 and G6. There is significant unnecessary repetition of content in relation to landscape and environmental matters. In our analysis this is due to a need to ‘populate’ a fine-grained series of headings with content. If the sections were combined, unnecessary repetition can readily be eliminated, with no loss in the effectiveness of the content of the guide.</p> <p><b>WCC Reject, No change</b></p> <p>WCC’s summary is that “Seeks that G12 and G13 (Designing with Topography) of the Centres and Mixed Use Design Guide are integrated.” That summary and Ms Curle’s evidence [at 18] is incorrect as our submission comment relating to G12 and G13 does not relate to the Residential Design Guide.</p> <p>Our analysis and recommendation remains that G12 should be relocated and it could be combined with G16 which covers exactly the same matter but with useful detail.</p> <p>Moreover, it is not material whether or not the topography is changing, as stormwater needs to be addressed with all development.</p>
<p><b>Stormwater</b></p> <p>G16. • Where possible, new development should improve the quality and reduce the quantity of stormwater runoff. This could be through: » Minimising the area of impervious surfaces.</p>	<p>This should be edited. Either list the intended methods in full, or list best practice water sensitive design, but not both, as that is repetitive.</p>	<p><b>WCC Reject, No change</b></p>

	<b>Residential: Selected design guide content</b>	<b>Comment and/or recommendation</b>	<b>Evidence</b>
	<ul style="list-style-type: none"> <li>» Providing filtration and attenuation around car parks and other large impervious surfaces.</li> <li>» Providing roof gardens and vegetation on surfaces that would typically be covered by cladding or exterior building materials.</li> <li>» Capturing roof runoff in stormwater detention tanks for management.</li> <li>» Soakage/ground water recharge.</li> <li>» Implementing best practice water sensitive design.</li> </ul>		
	<b>Water conservation</b>		
G18.	<ul style="list-style-type: none"> <li>• Consider grey water reuse and circular water systems for washing and cleaning purposes.</li> </ul>	The validity of these re-uses of grey water should be verified. No mention is made of toilet flushing or irrigation which are common uses for grey water.	WCC Reject, No change
	<b>Effective public-private interface</b>		
G25.	<ul style="list-style-type: none"> <li>• • • The site layout must result in a compatible relationship between units considering privacy, shape, orientation and topography.</li> </ul>	This is very broad, undefined and its actual meaning uncertain. Edit or delete.	WCC Reject, No change Our submission point remains. What is intended by this broad statement and ‘a compatible relationship’ is not identified, even though some considerations in achieving that are noted. As currently expressed, this risks multiple and uncertain interpretations.
G27.	<ul style="list-style-type: none"> <li>• • Publicly accessible and relevant private facilities and activities, such as seating for dining, should extend out into public space.</li> </ul>	This may be relevant for ground floor non-residential activity in centres, but does not fit well with private dining rooms in houses or apartments.	WCC Accept in part, Change to PDP - Yes
G31.	<ul style="list-style-type: none"> <li>• Consider the scale of adjacent heritage buildings and areas in the design. Adopt street wall heights, upper-level setbacks, and appropriate building separation to respond to</li> </ul>	Repeats matters that must be addressed by the heritage guide if that applies. Delete from the Residential guide.	WCC Reject, No change  The design issue should be covered but it should not be covered twice. This is a matter of avoiding repetition where two guides apply.



Residential: Selected design guide content	Comment and/or recommendation	Evidence
the scale of adjacent heritage buildings and contributing buildings to heritage areas.		
G33. • Consider the quality of hoardings and use creative approaches to reduce the visual impact of construction sites where appropriate.	Delete. This is a construction management issue, not an issue for the actual proposed building design.	<p>WCC Reject, No change</p> <p>While we recognise Ms Curle’s advice [at 20] that hoardings may be discussed in pre-application meetings, we consider the focus of this design guide should remain on the quality of the proposed permanent site planning, open space, landscape and building outcome, not temporary structures during the construction phase. As it has been given a ‘one dot’ status, we consider this guideline should be deleted as it would contribute to focusing and tightening up the design guide.</p>
<b>Entrances</b>	<p>G37 and G39 should be combined as they deal with the same issue.</p> <p>For reference the guidelines are:</p> <p><i>G37 Entrances should be of adequate dimensions to provide universal access for all and allow for movement from a wide range of users, including moving furniture and wheelchairs. (two dot guideline)</i></p> <p><i>G39 Where possible, ensure dwellings on the ground floor have a step-free entry. (one dot guideline)</i></p>	<p>WCC Reject, No change</p> <p>A reasonable interpretation of Universal Access is that G37 cannot be applied without providing a step free entry to allow wheelchair access into the unit or to the lift. G39 covers a step free entry, where possible.</p> <p>Therefore, these guidelines contradict each other and, in both addressing the same matter, lead to unnecessary duplication. A simplified single guideline rewritten to be clear about intent would be more efficient.</p>
G40. • Where possible, provide canopies and verandahs at active edges of the building and above entrances.	<p>This does not apply to residential.</p> <p>If a residential development is located in a centre, the Centres design guide applies and it, and/or any standards cover this issue. Cover at entries is covered in G38. So G40 should be deleted.</p>	<p>WCC Accept in part, Change to PDP - Yes</p>

	Residential: Selected design guide content	Comment and/or recommendation	Evidence
	<b>Fencing</b>		
G44.	<ul style="list-style-type: none"> <li>• Fencing should be low with planting treatment along the site’s street boundaries to enhance the street edge and provide useful, useable space for residential occupants.</li> </ul>	<p>Should consider allowing a portion of the front fence to be high – not more than 50% of the street boundary length to allow for a partially private front yard in situations where the only sunny private outdoor living area can be at the front of the dwelling.</p> <p>Alternatively, this matter could be addressed as a standard to clarify what is ‘low’ and deleted from the Guide.</p>	<p>WCC Reject, No change</p> <p>To be clear, we support the principle of low front fences. Dr Zamani covers the front fence standard [at 38] and notes allowing for some higher portions of fencing that are “50% transparent”. To ensure coordination between standards and design guide, that possibility should also be recognised here rather than a blanket ‘low’ – which will lead to debate and need for clarification.</p>
	<b>Connections for people</b>		
G49.	<ul style="list-style-type: none"> <li>• Pedestrian-only routes should be wide enough for two people pushing a stroller to pass each other comfortably, and be landscaped and legible. This is especially important for larger developments where footpaths service multiple units to create a sense of place and ensure safety.</li> </ul>	<p>This may be suitable for some routes, but is not necessary for others. The subtleties of width being suitable for location and function should be acknowledged.</p>	<p>WCC Reject, No change</p> <p>This will lead to poor, non-context specific design. While this principle may be entirely appropriate to the main pathways to, from and within a residential complex, it should not <u>be required</u> to apply to all paths such as service access, meandering recreational paths through a garden area and so on.</p> <p>Otherwise this could lead to some perverse and poor, unnecessarily hard surfaced design outcomes, or a process complication in having to justify an appropriate site-specific design reponse.</p> <p>Therefore, we do not agree with Ms Curle [at 24] when she considers that this would not restrict flexibility in design. The wording of this ‘two dot’ guideline is quite directive, and simple qualification addition to the text would provide clarity on intent and where flexibility is anticipated.</p>

	<b>Residential: Selected design guide content</b>	<b>Comment and/or recommendation</b>	<b>Evidence</b>
G50.	<p><b>Garages, carports and carpads</b></p> <ul style="list-style-type: none"> <li>• • • For large developments, avoid concentrating garages at the internal street frontage or repetition of garage doors along the internal street frontage.</li> </ul>	<p>This conflates street with external accessways, and does not apply to external streets. That should be added.</p>	<p>WCC Reject, No change</p> <p>WCC summary of our submission is: “Seeks that G50 (Garages, carports and car pads) of the Residential Design Guide is amended to state that this guideline does not apply to external streets”. Council’s summary is therefore incorrect.</p> <p>Our concern is two-fold. First, use of the word ‘internal street’ when in many cases that might be better as driveway, accessway or internal vehicle circulation route. And second, we consider attention should be given to garaging at the street.</p> <p>Furthermore, if internal concentration of garages is to be avoided off internal vehicle access routes, because it does not address garages at the street, it may imply a concentration of garages at the street edge is acceptable. In our opinion it is not.</p> <p>Editorial change should be undertaken for greater precision.</p>
G54.	<p><b>Vehicle crossings and basement entries</b></p> <ul style="list-style-type: none"> <li>• • • The frequency, design and width of vehicle crossings must not undermine the pedestrian experience of the street.</li> </ul>	<p>Sound in principle, but undefined, leading to uncertainty. Further explanation is required.</p>	<p>WCC Reject, No change.</p>
G55.	<p><b>Grouped parking and shared access at grade</b></p> <ul style="list-style-type: none"> <li>• • • Ensure that parking or vehicle manoeuvring areas provide pedestrian access that differentiates safe walking paths.</li> </ul> <p><i>Planting is also important in ensuring visual amenity, stormwater treatment, shade and screening of grouped carpark spaces.</i></p>	<p>This is unnecessary in some instances where a shared surface approach may be both suitably safe and the optimal solution.</p> <p>Also the italicised text under this does not relate to the subject of the guideline.</p>	<p>WCC Accept, Change to PDP – Yes</p> <p>WCC Accept, Change to PDP - Yes</p>

	<b>Residential: Selected design guide content</b>	<b>Comment and/or recommendation</b>	<b>Evidence</b>
G58	<ul style="list-style-type: none"> <li>• • • Car parking must not be located at the street front...</li> </ul>	<p>While this is sound in principle, there may be instances where it is acceptable to have a carpark, subject to appropriate façade design located at upper levels and extending to the street edge. That should be acknowledged but is precluded by this guideline.</p>	<p>WCC Reject, No change.</p> <p>In our opinion prohibition of car parking at the street front is a district plan standard matter, not for the design guide. However, we are also of the opinion that there can with suitable design, including for situations where site conditions make parking at the rear impossible. This guideline may discourage (but not prohibit) parking at the frontage but also should be amended to describe the situations how any street edge parking permitted by the District Plan standards can be integrated. We consider this should be anticipated as we can cite multiple examples where because of high quality landscape and architectural design some carparking has been able to be accommodated at the frontage.</p>
G59.	<ul style="list-style-type: none"> <li>• • • Ensure legibility and safety in parking areas by providing designated separate pedestrian routes on shared accessways (e.g differing levels and surface treatments) that are convenient with easily understood circulation for both pedestrians and motorists.</li> </ul>	<p>This should be combined with G55 as it addresses the same matter, but with qualification noted above.</p>	<p>WCC Accept, Change to PDP – Yes</p>
G60.	<ul style="list-style-type: none"> <li>• • Carparking should be grouped to improve frontage relationships, setbacks, streetscape, private open space, laneway, landscaping, etc.</li> </ul>	<p>The meaning of this is both unspecific and broad. It could mean many things and should be edited or deleted. Conflicts with G58.</p>	<p>WCC Accept, Change to PDP – Yes</p>
G62.	<p><b>Legibility</b></p> <ul style="list-style-type: none"> <li>• • • Provide shared internal circulation within developments that are efficient, convenient and understandable.</li> </ul>	<p>The italicised statement above relates to neighbourhood design yet the guideline relates to design within the site. That statement should be deleted. Grammar needs to be corrected.</p>	<p>WCC Accept, Change to PDP – Yes</p>

	<b>Residential: Selected design guide content</b>	<b>Comment and/or recommendation</b>	<b>Evidence</b>
		This guideline should be integrated into 'Connections for people'	
G63-72	<b>Lighting</b>	This is a matter of detail that is generally and can be covered by standards and referred to in conditions of consent.	WCC Reject, No change
	<b>Communal open space</b>	The five guidelines here might be compressed into one. Sunlight access – more guidance required on what an appropriate level and extent of sun should be for shared spaces.	WCC Reject, No change WCC Reject, No change
G84.	<b>Private open space</b> <ul style="list-style-type: none"> <li>• • In situations where the 'principal area' of private open space is located in the front yard, it should: <ul style="list-style-type: none"> <li>» Be separated from the driveway and primary pedestrian access to the front door.</li> <li>» Be an inviting and comfortable space that encourages residents to spend time there.</li> <li>» Consider sun and shelter.</li> <li>» Consider passive surveillance and lower fencing.</li> <li>» Consider screening of services.</li> </ul> </li> </ul>	Some provision for private occupation of parts of the frontage, along with low fencing along the balance should be made for this situation.  Sunlight access – more guidance required on what an appropriate level and extent of sun should be.	WCC Reject, No change If the standards allow for a component of higher, albeit 50% visually permeable fencing at the street edge than this matter will have been resolved.  WCC Reject, No change
G89.	<b>Balconies and sunrooms</b> <ul style="list-style-type: none"> <li>• • Heat pumps and clothes lines that are designed into the balcony space should not impact the usable space or obstruct passive surveillance.</li> </ul>	Should refer to 'occupiable'' space, as clothes lines are a legitimate use that is required by this guide.	WCC Accept, Change to PDP – Yes
	<b>Waste collection and storage</b>	There is scope for considerable compression of these as they overlap. Reference is made to a waste collection bylaw (2020) which might supersede much of this content.	WCC Reject, No change

	Residential: Selected design guide content	Comment and/or recommendation	Evidence
	<b>External storage</b>		
G99.	<ul style="list-style-type: none"> <li>• • • For large developments, provide a secure weatherproof storage area external to the unit large enough to store a bicycle.</li> </ul>	Combine G99, G101, G102 and G103 into a single guideline.	<p>WCC Reject, No change WCC considers that “no specific reason provided”</p> <p>A specific reason has been provided in our submission, and that is to avoid unnecessary repetition. See also our evidence above on these specific guidelines. Our point is that this is an easy opportunity to reduce the complexity of the guide without any loss of effectiveness.</p>
G100.	<ul style="list-style-type: none"> <li>• • • External storage areas must be of an appropriate size and volume in relation to the occupancy of the allocated unit.</li> </ul>	To address uncertainty, some <u>guidance</u> on what that means should be provided.	WCC Accept, Change to PDP – Yes
G101.	<ul style="list-style-type: none"> <li>• • Where possible locate bicycle storage near to primary entrances for convenient access and to encourage usage.</li> </ul>	Combine G99, G101, G102 and G103 into a single guideline.	
G102.	<ul style="list-style-type: none"> <li>• • Bicycle storage should accommodate electric bicycles (wallmounted racks are inappropriate for electric bicycles). Bicycle storage should also consider including spaces for larger bicycles and adaptable bicycles.</li> </ul>	Combine G99, G101, G102 and G103 into a single guideline.	<p>WCC Reject, No change WCC considers that “no specific reason provided”</p> <p>For reason see our comment above in relation to G99</p>
G103.	<ul style="list-style-type: none"> <li>• • Bicycle storage areas should be accessible from the main entrance of the site. Consider ramps or bicycle stairways (steps including a side channel for bicycle movement).</li> </ul>	Combine G99, G101, G102 and G103 into a single guideline.	<p>WCC Reject, No change WCC considers that “no specific reason provided”</p> <p>See our comment above in relation to G99</p> <p>Ms Curle [at 33] suggests that separate guidelines are required to “isolate” design issues and direct applicants. That can just as readily be achieved with covering the same very closely related points as bullets under a single guideline, as seen elsewhere the proposed RDG. In this way the guide is</p>

Residential: Selected design guide content	Comment and/or recommendation	Evidence
		compressed and simplified with no loss of content or effectiveness.
G104. • • Access to storage and service areas should have access control.	Combine G104 and G105	WCC Reject, No change WCC considers that “no specific reason provided”  For reason see our comment above in relation to G99
G105. • • Storage and service rooms should be visible from the public, communal, or private spaces for passive surveillance.	This may be challenging to achieve when storage and service areas are within basements and some service areas are on rooftops. Text should be edited for more precision.	WCC Accept, Change to PDP – Yes
<b>Architectural Context</b>		
G107 • • New buildings in prominent locations, such as ridgelines or hilltops, should: » Use visually recessive finishes and colours » Use roof materials and colours that are dark and absorb rather than reflect light.	Light (and heat) absorbent risk contributing to the urban heat island effect. We may question priorities – whether visibility of a building in an urban area is more important than minimising contribution to atmospheric heat gain. If the latter, the second bullet point of the guideline should be removed.	WCC Accept, Change to PDP – Yes
<b>Visual privacy</b>		
G110. • • • Locate and size windows that will be adjacent to public or communal areas in a way that minimises loss of internal privacy for dwellings.	Recommend turn this wording around to provide for reasonable internal privacy.	WCC Reject, No change  Ms Curle [at 35] describes the intention of G110 is to “provide visual connection between dwellings and public or communal areas without losing internal privacy”. That intent is not recorded in the wording of the guideline. Editing is required for completeness and precision.

Residential: Selected design guide content	Comment and/or recommendation	Evidence
<b>Internal living spaces</b>		
G115. • • Locate and stack living rooms above living rooms of different units for noise considerations: » Stack bathrooms and wet areas above other wet areas for the noise of running water.	This is one way of dealing with noise, but is not strictly necessary. It would be preferable to identify that this might also be addressed by construction.	<p>WCC Reject, No change</p> <p>While this is a sound ideal principle, to <u>require</u> it is unnecessarily restrictive, and does not take into account the full range of relevant considerations or technical design solutions that would allow alternative configurations of units. It is unnecessarily onerous and restrictive as currently worded.</p> <p>(Ms Curle’s reference to G115 [at 36] appears to be a typo as her text appears to refer to G116.)</p>
<b>Circulation</b>		
G117. • • • Ensure circulation and spaces within dwellings are efficiently planned and wide enough to optimise amenity, accessibility and flexibility in use and provide legible wayfinding. Consider sufficient width for manoeuvring around beds, parking spaces and within kitchens and bathrooms for accessibility.	<p>This guideline combines consideration of too many, not particularly convincingly grouped matters.</p> <p>This mixes room space standard with circulation layout and capacity, and room size is already covered by G114. And, for example, wayfinding does not apply to kitchens and bathrooms.</p> <p>For reference G114 is:  <i>“Ensure rooms are large enough to accommodate the functions appropriate to their type: Living rooms should comfortably accommodate the number of expected occupants in the dwelling.”</i></p>	<p>WCC Reject, No change</p> <p>Some simple editing could combine these two guidelines into one with no loss of intended content.</p> <p>Legibility or wayfinding is not a general consideration for design review within any dwelling as it can be reasonably assumed that the occupant will be familiar with and able to find their way around their dwelling. It may only become an issue for highly specialised types of housing which might include for people that have visual acuity or neurological/memory issues, so therefore need not be applied to the design of all units.</p>
<b>Light and sun</b>		
G118. • • • Locate and design the living areas and bedrooms of individual residential units to achieve direct natural lighting and optimise sun exposure and views.	This title should be ‘sun exposure’ as the three guidelines refer to sun, and ‘natural light is covered by G121 and g122 that follow.	<p>WCC Reject, No change</p>



Residential: Selected design guide content	Comment and/or recommendation	Evidence
G119. • • • Orientate and position all dwellings and their windows to receive the maximum possible hours of midwinter sun into at least one main living room.	'Maximum possible' leads to uncertainty and ambiguity. The minimum amount of sun that should be provided should be defined, allowing for some flexibility.	<p>WCC Reject, No change</p> <p>The openness of the term "<i>maximum possible hours</i>" can be expected to lead to multiple different personal interpretations and ongoing dispute.</p> <p>We agree that in principle sun exposure is desirable, however identifying a frame of reference for assessment with a minimum will give clarity on intention and also minimise debate on acceptability.</p>
<b>Natural light</b>		
G122. • • • Ensure habitable rooms have an external window to receive direct natural light and avoid borrowed light, particularly for bedrooms to ensure the mental well-being of people.	Is there a clear and unequivocal empirical link between borrowed light and mental well-being? If not that part of the text should be removed.	<p>WCC Reject, No change</p> <p>Ms Curle [at 38] restates her belief that there is a linkage between windows in habitable rooms and mental and physical well-being. We are aware of some evidence in regard to the linkage between daylight and health effects. With full awareness of that evidence, in our opinion the issue here is that sufficient daylight should be provided rather than a particular design solution being either prescribed or proscribed.</p> <ul style="list-style-type: none"> <li>• The NZ Building Code applies, and that is calibrated to ensure suitable standards for daylight.</li> <li>• While it is optimal that all bedrooms have an external window, precluding borrowed light on small compact unit types unnecessarily restricts unit options.</li> <li>• Furthermore, use of the term "<i>particularly for bedrooms</i>" implies that the requirement for avoidance also applies to other types of rooms, potentially bathrooms, kitchens and laundries. While that seems a perverse interpretation of</li> </ul>

Residential: Selected design guide content	Comment and/or recommendation	Evidence
G123. • • • Ensure habitable rooms, especially bedrooms and living spaces have at least one openable window to an external wall for direct access to fresh air.	While this is sound in principle, this guideline which ‘must be applied’ may be problematic for apartments in noisy entertainment districts. That situation must be recognised.	<p>the text, unless it is clear, in our experience a resource consent assessment will often take the most conservative reading of the text. Therefore, it can be expected that this restriction is applied where it is not necessary.</p> <ul style="list-style-type: none"> <li>• Greater precision of expression is needed here.</li> </ul>
<p><b>Community internal amenity</b></p> <p>G126. • • • In large multi-unit developments, provide a functional multipurpose internal communal room to be utilised for social gatherings.</p>	There needs to be guidance about what is meant by large. This mandatory requirement might be relevant to a large apartment development, but may be irrelevant to a large terraced housing development.	<p>WCC Reject, No change</p> <p>Our concern remains. Opening windows are in principle desirable. However, the guideline should at least recognise there may be situations where the primary means of ventilation is not an opening window.</p> <p>WCC Reject, No change</p> <p>As a ‘three dot’ guideline, this is too onerous. Such a space is usually provided for in social housing, and increasingly in build-for-rent development. It might be included but is not strictly necessary in other types of development. So, if it remains, it’s star rating should be downgraded and text modified to address the matters below:</p> <ul style="list-style-type: none"> <li>• We reiterate it is not necessary in a terraced housing development to provide an internal community room for social gatherings. In some development a communal outdoor or garden space is provided for this purpose.</li> <li>• Requiring a communal indoor room requires in turn a management structure for management and maintenance which would otherwise not be needed in most privately owned terrace houses.</li> <li>• This requirement does not take into account that there may be existing public facilities already available in the neighbourhood.</li> </ul>

Residential: Selected design guide content	Comment and/or recommendation	Evidence
<p><b>Accessibility</b></p> <p>G132. • • • Ensure developments are inclusive of people of all ages and abilities, including the ageing population, children and pregnant women or parents with infants and toddlers.</p>	<p>What ‘are inclusive of’ means should be defined, as this is a ‘must be applied’ guideline.</p>	<p>Ms Curle [at 40] in relation to submission on this guideline identifies that as this has a three-dot rating the applicant would have to justify why they are not providing this.</p> <ul style="list-style-type: none"> <li>• Our point is that in many types of development and situations, there would be no justification for such a space, and the applicant should therefore not have to justify not providing it.</li> <li>• Furthermore, as set out on page 5 of the guide, the ‘three dot’ rating sets a high bar for matters “<i>considered essential and [that] must be applied to all proposed development.</i>”</li> <li>• An addition to the guideline could readily address when and to what types of development it should apply.</li> </ul> <p>If the guideline were to remain in some form, identifying a frame of reference for assessment with an indication of what ‘large’ is for apartment development will give clarity on intention and also minimise debate on acceptability.</p>
		<p>WCC Reject, No change</p> <p>Our concern about the vagueness of this guideline remains. On one hand it is implying that wheelchair access is required (as it is a 3 dot guideline) and then immediately below G133 seems to contradict this with a one dot “<i>where possible</i>” rating.</p> <p>This contradiction needs to be resolved, and in doing this, these two guidelines could also be compressed into one.</p>

	<b>Residential: Selected design guide content</b>	<b>Comment and/or recommendation</b>	<b>Evidence</b>
G133.	<ul style="list-style-type: none"> <li>Where possible, provide ground-level access that is accessible by people using wheelchairs, and design units with reference to NZ standards for access and mobility.</li> </ul>	This is given little weight (one dot) but might be an important aspect of achieving G132.	WCC Reject, No change
G137	<b>City outcomes contribution</b>	<p>See detailed comments at top of this submission.</p> <p>For reference, this is point 9, pages 3 and 4 of our submission which is included in this evidence as Appendix 1.</p>	This has been deferred to the Stream 3 hearings, however what we see as the shortcomings of this mechanism have significant implications for the quality of the environment for and health and well-being of residents in the residential zones. Refer to our evidence on this above.