

Speaking Notes

Graeme McIndoe and Andrew Burns, 30 March 2023

These refer to our 16 March 2023 Statement of Urban Design Evidence.

QUALITIES AND GENERAL APPROACH TO THE DESIGN GUIDES

Use of Statutory Design Guides (refer evidence at 18,19)

- We support design guides in the District Plan. However, unless they are re-conceptualised, restructured and edited, we don't think the proposed documents should be included. This is for reasons we've identified, relating mainly to structure and expression of content, not to removing any substantive and useful content.

Review and refinement of all design guides (refer evidence at 20, 21)

- The proposed guides must all work together and multiple guides apply to individual projects, but they are currently not properly coordinated. The form and content of the entire suite of guides should be edited and coordinated.

Repetition between design guides (refer evidence at 22-25)

- When multiple design guides apply that there is considerable and unnecessary repetition. That is inefficient, adds cost and does not benefit the quality of outcome. (refer para 24)
- It is unnecessary and unhelpful to apply 234 guidelines to a residential development in a CMU zone. Comprehensive assessment is already time-consuming, so unnecessary and unhelpful repetition can and should be eliminated.

Inconsistency of expression between guides (refer evidence at 26-29)

- Table 1, a sample of the first 15 guidelines in the RDG and CMUDG shows overlap, but also variation. This demonstrates:
 - Inconsistency of expression: the same issue should be expressed in the same way in different design guides, unless there's a good reason for difference; and
 - There's contradiction which is problematic when both guides apply.

Coordination to eliminate overlap and unnecessary repetition (ref.evidence at 30-33)

- A simple and readily achievable solution is to restructure the RDG (and all guides) into zone-specific content, and residential content. (refer para 31) This would eliminate unnecessary repetition, inefficiency and cost in the assessment and

processing of hundreds if not thousands of applications across the life of the district plan.

Repetition within each design guide (refer evidence at 34-40)

- The proposed guidelines are broken down into sometimes barely distinguishable separate guidelines (for example refer para. 36 and 37). These, and others like them could be compressed without loss of material content into fewer guidelines.

Numbering 'design outcomes' (refer evidence at 41)

- 'Outcomes' are confirmed by Council to be a core part of the district plan design guides. In that case, they should be numbered for ease of reference.

Clarity, precision and consistency of expression (refer evidence at 42,43)

- We consider editing is required to polish the text of the guides to remove unnecessary variation and ambiguity, and we've identified some examples.
- We've also identified (at 43) where the RDG and the CMUDG cover an issue and both design guides apply (such as for residential in the CMU zone) but the expression and guideline are different. One example has different 'dot ratings'. That introduces internal contradiction into the district plan.

Cryptic, incomplete and varied expression (refer evidence at 44-49)

- In many cases the intended meaning of guidelines is insufficiently clear and unambiguous. That risks multiple unintended interpretations, unnecessary debate and dispute when these guidelines are applied.
- For example, architectural coherence is covered quite differently in two of the design guides, both of which apply to residential in a CMU zone.
 - Description of architectural coherence in the CMUDG is unhelpfully cryptic.
 - Architectural coherence is better described in the RDG, but the explanation that applies is incorrect or misplaced. Editing is required here.
 - This fundamental principle should be expressed once and expressed correctly and consistently, and the guides should not contradict each other.
- There should also be consistency of expression of guidelines within any list (that is within all design guides). Refer para.49.

Context analysis (refer evidence at 51-55)

- Multiple overlapping lists remain.

- This focuses on process and information rather than intended design outcome. It is better to concentrate on designing for context, rather than describing context.
- The quality of the context analysis output will be variable.
- Analysis to the extent required is expensive, inefficient and likely in most cases to offer little if any benefit. A similar proposal was in 2015 deleted from the proposed Auckland Unitary Plan.

City Outcomes Contribution (refer evidence at 56-65)

- This mechanism for allowing significant additional height does not address shading, wind and visual dominance effects on the residential zones (and also in Centres and Mixed Use zones), where these matters are crucial.
- This mechanism risk unconscionably negative effects on residential neighbours and its content should be reconsidered.
- City Outcomes Table 3 refers to an Urban Design Panel that does not yet exist.
- It calls for a Panel to undertake review against “all the design guides as decided by the panel”. With a point rating of 1-10, a lot depends on this. But that is a specific task requiring reference to all guides that apply which is impractical to the point of impossibility where 137 guidelines apply let alone 234 guidelines for a residential development in a CMU zone.

Conclusions

- We refer the Panel to our conclusions at paragraphs 69-74.
- We will not go through the detail of our Appendices. We are hoping that these along with detailed submissions from many others, most of which Council has rejected, can be used to refine the guides to address matters we’ve raised.
- Looking forward towards expert conferencing, we consider there is scope to restructure and refine for a tighter and more effective suite of design guides, that will lead to more efficient process and enhanced design outcomes.

End note: Clarification on “Design Guide Introduction” and Design Guide “Introduction”

- As notified, two different design guide introductions apply. There’s the 16 page “Design Guide Introduction” document which we were referring to in submission. And a separate “Introduction” in each design guide. It appears Council in S42A is assuming we were calling for removal of the “Introduction” in the Residential Design Guide. We were not.
- At our evidence (para 16) we are responding to WCC’s S42A response to our submission, and we thus confirmed that the RDG Introduction should be retained. There is no change to our submission, that the separate “Design Guide Introduction” should be removed.
- On this matter, WCC is recommending locating some of the content of that separate “Design Guide Introduction” into the “Introduction” of each design guide. On the basis of our original submission, subject to the nature of intended content, we support in principle WCC’s latest approach.