

Wellington City Proposed District Plan

Stream 2 – Part 3, Residential Zones – Part 6: Design Guides – General Design Guides – Introduction Residential Design Guide Papakāinga Design Guide

Section 42A of the Resource Management Act

Part 6: Design Guides General, Residential Design Guide, Papakāinga Design Guide

1.0 Overview

1. This section of the 42A report for the Part 3 – Residential Zones addresses submissions on Design Guides generally, the Design Guides Introduction, the Residential Design Guide and the Papakāinga Design Guide.
2. There were 74 submitters who collectively made 304 submission points on this topic.
3. There were 16 further submitters who collectively made 136 further submission points. Overall there were 440 total submission points on Design Guides generally, the Design Guides Introduction, the Residential Design Guide and the Papakāinga Design Guide.
4. These submissions are categorised and assessed as follows:
 - a. General Matters Relating to the Design Guides:
 - i. General points
 - ii. Retention of Design Guides
 - iii. Statutory nature of the Design Guides
 - iv. Clarity regarding application of the Design Guides
 - v. Mandatory design requirements
 - vi. Location-based Design Guides
 - vii. Rationalisation of Design Guides
 - viii. Sunlight and daylight
 - ix. Three waters design guidance
 - x. Design Panel
 - xi. Partnering with Mana Whenua
 - xii. Te ao Māori perspective
 - xiii. Sustainability
 - xiv. Design quality
 - xv. Accessibility
 - xvi. Waste minimisation
 - b. Design Guide Introduction
 - c. Residential Design Guide:
 - i. Changes to application of Residential Design Guide
 - ii. Removal of Residential Design Guide or make non-statutory for some developments
 - iii. Retention of Residential Design Guide within the District Plan
 - iv. Rationalisation of provisions
 - v. Area/zone-specific Residential Design Guide guidelines
 - vi. Responding to whakapapa of place (G1 – G2)

- vii. Vegetation and planting, urban ecology, and carbon reduction – natural environment (G3 – G10)
- viii. Designing with topography (G11 – G15)
 - ix. Designing with water (G16-G20)
 - x. Ground floor interface and frontage (G21 – G33)
 - xi. Entrances (G36 – G40)
 - xii. Facades (G41)
 - xiii. Fencing (G43 – G44)
 - xiv. Connections for people (G45 – G49)
 - xv. Garages, carports and carpads (G50 – G53)
 - xvi. Grouped carparking and shared access at grade (G55 – G60)
- xvii. Legibility (G62)
- xviii. Lighting (G63 – G72)
 - xix. Carbon reduction – site (G73 – G74)
 - xx. Communal open space (G75 – G79)
 - xxi. Private open space (G80 – 86)
 - xxii. Balconies and sunrooms (G87 – G89)
- xxiii. Waste storage and waste collection (G90 – G94)
- xxiv. Service elements (G95 – G98)
 - xxv. External storage (G99 – G105)
- xxvi. Architectural context and architectural coherence (G106 – G109)
- xxvii. Visual privacy (G110 – G113)
- xxviii. Internal living spaces (G114 – 116)
 - xxix. Circulation (G117)
 - xxx. Light and sun, natural light (G118 – G122)
 - xxxi. Natural ventilation (G123)
 - xxxii. Communal internal amenity (G124 – G129)
 - xxxiii. Internal storage (G130 – G131)
 - xxxiv. Accessibility (G132 – G133)
- d. Papakāinga Design Guide.

5. All of these guidelines are addressed as part of the Council’s Intensification Planning Instrument (IPI) through the Intensification Streamlined Planning Process (ISPP). The exception is the Papakāinga design guide which has been notified under the Part One, Schedule One process.
6. This report should be read in conjunction with the information in the following appendices:
 - a. Appendix A – Recommended Amendments to the Residential Chapters
 - b. Appendix B – Recommended Responses to Submissions and Further Submissions on the Residential Chapters.

2.0 Format for Consideration of Submissions

7. For each topic, the consideration of submissions has the following format:

- Matters raised by submitters;
- Assessment; and
- Summary of recommendations. The specific recommendations are in Appendices A and B.

8. I note that there were no submissions on the following provisions in the Residential Design Guide:

- G2 - Responding to whakapapa of place
- G11 - Designing with topography
- G21 – G24, G26, G28-29 and G32 - Ground floor interface and frontage
- G34-G35 - Passive Surveillance
- G36 and G38 – Entrances
- G42 – Corner sites
- G45-G48 - Connections for people
- G51 – G52 - Garages, carports and carpads
- G54 - Vehicle crossings and basement entries
- G57 - Grouped carparking and shared access at grade
- G61 - Undercroft parking and podiums
- G85 – Private open space
- G88 - Balconies and sunrooms
- G95 - Service elements
- G108 - Architectural coherence
- G111 – G113 - Visual privacy
- G114 – Internal living spaces
- G124 – G125 - Communal internal amenity
- G134 – G136 - Carbon reduction – buildings.

I recommend that these provisions are retained as notified, and have not assessed them further in this report.

9. The submissions on Papakāinga Design Guide were of general support, with some minor amendments recommended. None of the specific provisions were opposed.
10. G137 'City Outcomes Contribution' will be addressed in the Stream 4 S42A Report and associated hearing.

3.0 General Matters Relating to the Design Guides

11. There were a number of general submission points relating to the Design Guides and their application, which are best addressed in Hearing Stream 2. These are set out and addressed in turn below.

3.1 General Submission Points

Matters raised by submitters

12. Victoria University of Wellington Students' Association [123.65] supports the prioritisation of higher density urban form and living and the public outcomes over private amenities. No specific decision is requested.
13. McIndoe Urban Limited [135.12] seeks that requirements for detailed information on construction, materials, services that is only reasonably developed following receipt of resource consent are removed.
14. Glenside Progressive Association Inc [374.11] seeks that Design Guides be stricter in restricting earthworks in elevated development areas, particularly Upper Stebbings and Glenside West. Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd, Stebbings Farmland [FS75.6] seeks that 374.11 be disallowed.
15. Marilyn Head [457.8] considers the landscaping standards to be too low. No specific decision is requested.
16. Greater Brooklyn Residents Association Inc's [459.14] considers it is appropriate to amend the design guide as they consider that there is enough capacity in the ODP to accommodate the projected population growth, and seeks to amend the design guide.
17. Guy Marriage [407.8] seeks the addition of a Multi-Unit Design Guide.
18. Historic Places Wellington [182.31] also seeks a new multi unit design guide to ensure that new development is well designed and will complement the predominant patterns of local neighbourhoods. The Retirement Villages Association [FS126.72] and Ryman Healthcare [FS128.72] seek that 182.31 be disallowed.
19. Wellington Branch NZIA [301.13] seeks that the Multi-Unit Design Guide be reinstated. The Retirement Villages Association [FS126.226] and Ryman Healthcare [FS128.226] seek that 301.13 be disallowed.
20. Wellington City Youth Council [201.46] supports and emphasises the importance of current, new, and renovation toward high-performance buildings. No specific decision is requested.
21. Stratum Management Limited [249.43] seeks to retain the ranking system in Design Guides as notified.

Assessment

22. In response to the submission point from Victoria University of Wellington Students' Association [123.65], the Residential Design Guide contains guidelines for private amenity which support the related controls in the district plan. I consider that it achieves a balance of change in expected amenity values and intensification.

23. Regarding the submission point from McIndoe Urban Limited [135.12], a 'one dot rating' under the Design Guides rating system equates to the lowest priority of design response. I note that these matters are better addressed by the Building Code and that the District Plan cannot be more stringent than it. Accordingly, the wording used for this guideline is softer, for example 'encourage'.
24. In response to the submission point from Glenside Progressive Association Inc [374.11 (opposed by Lincolnshire Farm Ltd, Hunters Hill Ltd, Best Farm Ltd, Stebbings Farmland FS75.6)], no design guidance is mandatory. Instead, the Design Guides have a dot rating system. I consider the current rating system is sufficient with the guidelines relating to earthworks and landform either having two or three dots.
25. No specific decision has been requested from Marilyn Head [457.8]. The submission point is noted.
26. In response to the submission point from Greater Brooklyn Residents Association Inc [459.14], I consider that the projected growth and consequent enabled higher density and intensification are aligned with the HBA, NPS-UD and MDRS.
27. Regarding the submission point from Guy Marriage [407.8], Historic Places Wellington [182.31 (opposed by The Retirement Villages Association FS126.72 and Ryman Healthcare Limited FS128.72)] and Wellington Branch NZIA [301.13 (opposed by The Retirement Villages Association FS126.226 and Ryman Healthcare FS128.226)], I note that the whole of the Residential Design Guide applies to multi-unit housing and I consider that given the varying scale of multi-unit housing enabled by the plan, a more general 'Residential Design Guide' is appropriate.
28. Regarding the submission point of Wellington City Youth Council [201.46], this matter is already addressed in guideline G134 of the Residential Design Guide and guideline G93 of the Centres and Mixed Use Design Guide, which speak to new developments selecting low carbon and carbon banking materials, locally sourced/manufactured materials, low energy fittings, installing insulation over and above the minimum requirements, designing for natural ventilation and sunlight access and the adaptive reuse of existing buildings.
29. I acknowledge the submission point from Stratum Management Limited [249.43].

Summary of recommendations

30. HS2-P6-Rec1: No amendments are recommended in response to general submission points on Design Guides.
31. HS2-P6-Rec2: That submission points relating to general points on Design Guides are accepted/rejected as detailed in Appendix B.

3.2 Retention of the Design Guides within the District Plan

Matters raised by submitters

32. Victoria University of Wellington Students' Association [123.64] supports the endeavour to make the Design Guides more simplified and accessible as well as limiting the potential for different interpretations, and seeks to detain the Design Guides as notified.
33. Precinct Properties New Zealand Limited [139.58] seeks to retain the Design Guides as notified.
34. WCC Environmental Reference Group [377.516] is generally supportive, with no specific decision requested.
35. Cheryl Robilliard [409.7] and Paul M Blaschke [435.11] seek to retain Design Guides as notified.
36. Miriam Moore [433.20] seeks to retain provision, subject to amendments, as outlined other submission points.
37. Anita Gude and Simon Terry [461.31] considers that the WCC's latest revisions of the Design Guides has produced a lot of very good changes. There are now far clearer descriptions of what defines the character that is sought to be protected, compared to that laid out in the versions that accompanied the draft district plan. No specific decision is requested.
38. Stride Investment Management Limited [470.63] supports in general the intent and provisions of the Design Guides, with no specific decision requested.

Assessment

39. In acknowledge the submission points by Victoria University of Wellington Students' Association [123.64], Cheryl Robilliard [409.7] and Paul M Blaschke [435.11] and Precinct Properties New Zealand Limited [139.58] to retain the Design Guides as notified.
40. In response to submissions of WCC Environmental Reference Group [377.516], Miriam Moore [433.20], Anita Gude and Simon Terry [461.31], and Stride Investment Management Limited [470.63] who generally supported the intent and provisions of the design guides, I note that later in this report I have made recommendations that minor changes be made to the notified Residential Design Guide in response to submissions received.

Summary of recommendations

41. HS2-P6-Rec3: No amendments are recommended in response to submission points on the retention of Design Guides.
42. HS2-P6-Rec4: That submission points relating to retention of Design Guides are accepted/rejected as detailed in Appendix B.

3.3 Statutory Nature of the Design Guides

Matters raised by submitters

43. McDonald's [274.75] seeks amendments to remove all direct references to the Design Guides in the PDP and for the relevant provisions to instead refer to the specific design outcomes that are being sought. The Retirement Villages Association [FS126.182] and Ryman Healthcare [FS128.182] support the submission point, subject to excluding retirement villages from any specific design principles as per their submissions.
44. Stride Investment Management Limited [470.64] seeks that the Design Guides are used as reference documents which sit outside of the District Plan.
45. Foodstuffs North Island [476.102] seeks to remove the Design Guides from the District Plan and instead revise provisions to refer to the specific design outcomes that are being sought.
46. Kāinga Ora [391.765] seeks to remove Design Guides from within the District Plan, as well as any references or requirements related to Design Guides, and instead to treat Design Guides as non-statutory tools, outside of the District Plan. Mt Victoria Historical Society Inc [FS39.24], Wellington's Character Charitable Trust [FS82.128], LIVE WELLINGTON [FS96.45], and Roland Sapsford [FS117.44] seek that 391.765 be disallowed. The Retirement Villages Association [FS126.165] and Ryman Healthcare [FS128.165] support the submission point as it relates to the removal of design guidelines and otherwise disallow the point in line with their submissions.
47. Kāinga Ora [391.766] seeks that a note be added in the PDP as follows:

1. Acceptable means of compliance and best practice urban design guidance is contained within the Council's Design Guidelines.

48. The Retirement Villages Association [FS126.166] and Ryman Healthcare [FS128.166] support the submission point as it relates to the removal of design guidelines and otherwise disallow the point in line with their submissions.
49. Kāinga Ora [391.768] seeks that Kāinga Ora be allowed to review Design Guidelines if they are to remain a statutory document. The Retirement Villages Association [FS126.168] and Ryman Healthcare [FS128.168] support the submission point as it relates to the removal of design guidelines and otherwise disallow the point in line with their submissions.
50. Investore Property Limited [405.138] seeks that the Design Guides are reference documents that sit outside of the district plan, rather than being formally incorporated into the district plan. The Retirement Villages Association [FS126.109] and Ryman Healthcare [FS128.109] support the submission point as it relates to the removal of design guidelines and otherwise disallow the point in line with their submissions.

51. Willis Bond and Company Limited [416.6, 416.197 and 416.198] supports the intent of the Design Guides, but seeks that these are non-statutory. The Retirement Villages Association [FS126.261 and FS126.252] and Ryman Healthcare [FS128.261 and FS128.252] support 416.198 as it relates to the removal of design guidelines and otherwise disallow the point in line with their submissions.
52. Fabric Property Limited [425.105] seeks that Design Guides are removed from the PDP and used as external reference documents. The Retirement Villages Association [FS126.29] and Ryman Healthcare [FS128.29] support 425.105 as it relates to the removal of design guidelines and otherwise disallow the point in line with their submissions.
53. Investore Property Limited [405.5] seeks that the Design Guides are reference documents that sit outside of the district plan, rather than being formally incorporated into the district plan. The Retirement Villages Association [FS126.75] and Ryman Healthcare [FS128.75] support 405.5 as it relates to the removal of design guidelines and otherwise disallow the point in line with their submissions.
54. Investore Property Limited [405.6] seeks that all direct references to the Design Guides be deleted and replaced with references as appropriate and necessary to the specific design outcomes that are being sought, for example "For guidance, refer to the Centres and Mixed Use Design Guide". The Retirement Villages Association [FS126.76] and Ryman Healthcare [FS128.76] support 405.6 as it relates to the removal of design guidelines and otherwise disallow the point in line with their submissions.
55. Willis Bond and Company Limited [416.200] seeks that Council may wish to include the maximum building depth provision in a non-statutory Design Guide. The Retirement Villages Association [FS126.262] and Ryman Healthcare [FS128.262] support 416.200 as it relates to the removal of design guidelines and otherwise disallow the point in line with their submissions.
56. Willis Bond and Company Limited [416.201 and 416.6] seek that references to the Design Guide in the PDP be removed and that the Design Guides should be non-statutory in a similar way to the Auckland Design Manual. They should be used for guidance on how the objectives and policies in Part 3 may be implemented. The Retirement Villages Association [FS126.263 and FS126.252] and Ryman Healthcare [FS128.263 and FS128.252] support 416.201 and 416.6 as it relates to the removal of design guidelines and otherwise disallow the point in line with their submissions. Foodstuffs North Island [FS23.103] seeks that 416.201 be allowed.
57. Willis Bond and Company Limited [416.202 and 416.203] seeks that if the Design Guides are to be retained, the Design Guides should be significantly pared back and reviewed for double-up / alignment with the objectives and policies in Part 3. The Retirement Villages Association [FS126.264 and FS126.265] and Ryman Healthcare [FS128.264 and FS128.265] support 416.202 as it relates to the removal of design guidelines and otherwise disallow the point in line with their submissions.

Assessment

58. In response to the general submission points raising concerns relating to the inclusion of the Design Guides as statutory documents in the PDP and the associated further submission points in support of these:
- a. The Design Guides have always been and continue to be a statutory part of the plan (except for the Papakāinga Design Guide) with a required assessment against them in the resource consent process;
 - b. I consider that having Design Guides as a statutory part of the plan will provide the applicants, designers, the public and resource consent planners with certainty over the design principles that are to be considered in designing a building;
 - c. I consider that removal of the Design Guides as a statutory component of the PDP would reduce certainty, as alternatives (including generic 'design' matters of discretion or non-statutory Design Guides) will lead to a less efficient and uncertain resource consenting process as there will no common set of design principles for applicants and councils' officers to work from;
 - d. I consider that removal of the Design Guides from the statutory context of the PDP would lead to confusion and a complex transition from the ODP to the future state; and
 - e. I consider that given the level of intensification anticipated under the PDP, it is important that the PDP includes statutory design guidance to achieve good built form, design and environmental outcomes for the City.
59. In response to the submission point from Willis Bond and Company Limited [416.200] and The Retirement Villages Association's further submission point [FS126.262] and Ryman Healthcare Limited's further submission point [FS128.262], the Design Guides are currently statutory documents (except for the Papakāinga Design Guide) under the ODP and will continue to be for the PDP. Given the level of intensification anticipated under the PDP, it is important that the PDP includes statutory design guidance to achieve good built form, design and environmental outcomes for the City. The depth control HRZ-S16 is sought to be retained and I do not see the need to put this in a design guide.
60. Regarding the submission points from Willis Bond and Company Limited [416.202 and 416.203], The Retirement Villages Association's further submission points [FS126.264 and FS126.265] and Ryman Healthcare's further submission points [FS128.264 and FS128.265], the Design Guides need to be standalone documents as not all guidelines (or Guides) will apply in every situation. Some minor refinements have been made which are addressed in individual design guide submission responses. There is some scope to consolidate guidelines and minor refinements have been made. However, because not all of the Design Guides will apply all at once, repeating design guidance is not an issue.

Summary of recommendations

61. HS2-P6-Rec5: No amendments are recommended in response to submission points on the statutory nature of the Design Guides.

62. HS2-P6-Rec6: That submission points relating to the statutory nature of Design Guides are accepted/rejected as detailed in Appendix B.

3.4 Clarity Regarding Application of the Design Guides

Matters raised by submitters

63. McIndoe Urban Limited [135.5] seeks that the Design Guides include mechanism for departure from the guidelines, which should be tied into identified, relevant and numbered objectives or outcomes. In their submission point McIndoe Urban Limited [135.5] consider that there is no mechanism for departing from the guidelines or clarity on how this will be assessed.
64. Stratum Management Limited [249.44] seeks that the 'Outcomes' that read as policies are included as policies, if that is the intention; alternatively, deletion or appropriate qualification of the 'Outcomes'.
65. Miriam Moore [433.21] considers that assessments against the Design Guide(s) could take extra time in the consenting process and seeks consent efficiency.
66. Foodstuffs North Island [476.66] seeks the relevant provisions (which refer to the Design Guides as notified) instead refer to the specific design outcomes that are being sought.

Assessment

67. In response to the submission point raised by McIndoe Urban Limited [135.5], I disagree that the Design Guides do not need to be 'met'. The Design Guides have a rating system which indicates which design guidelines take priority in terms of design guidance assessments for developments. The Design Guide Introduction states that diversion from the design guidelines is possible. In particular that, while the Design Guides are ultimately outcome-focused, specific guidance should not be used as a strict template or planning rules, nor should it reduce the potential diversity of design approaches taken to meet the overarching outcomes and principles of these Design Guides.
68. However, I consider that based on McIndoe Urban Limited's submission point [135.5] there may be concern with the way the Design Guides will be used as a rule book, or how they are to be interpreted. I consider that the flexibility/rigidity issue is explained in the Design Guide Introduction document, but people may not be aware of this content in a separate document. As such, I consider that key points from the Design Guide Introduction could be included in the introduction to each specific Design Guide. This way the applicants and resource consent planners can use each Design Guide the way they are intended to be used.
69. In response to the submission point raised by Stratum Management Limited [249.44], the Design Guides actually qualify the outcomes as their main intent.

70. Regarding the submission point of Miriam Moore [433.21], this is principally an operational matter. The Council must still meet its RMA timeframes for resource consent processing. As I have stated, I consider that including the Design Guides as a statutory part of the plan will increase efficiency as they provide a common set of design principles for designers and council officers.
71. Regarding the submission point of Foodstuffs North Island [476.66]:
- a. The Design Guides have always been and continue to be statutory documents (except for the Papakāinga Design Guide) with references required in the PDP to link back to the Design Guides.
 - b. The ODP relies on Design Guides and this has proven to be an effective tool, rather than include specific design outcomes in the District Plan. The PDP includes a clear objective, policy, rule and standards framework.
 - c. Adding specific design outcomes would necessarily result in excessively large chapters and be a less effective means to enable sufficient design assessments.
 - d. This report discusses more detailed aspects of this high-level point.

Summary of recommendations

72. HS2-P6-Rec7: For the reasons set out in my assessment above, I recommend no corresponding changes to the Design Guides in relation to [249.44, 433.21 and 476.66].
73. HS2-P6-Rec8: I recommend the following amendments to the Residential Design Guide introduction:

Application

...

It applies to all new residential developments requiring resource consent in the above zones. ~~The Design Guides are a statutory part of the Wellington City District Plan. The Council will use the Design Guides to assess resource consent applications for development.~~

This design guide is a statutory tool closely aligned to the objectives, policies and rules of Wellington City's District Plan. The Council will use this Design Guide to assess resource consent applications for developments where the District Plan provides discretion to do so. It is also intended to be accessible to a diverse audience so as to support the wider goals of Wellington's Spatial Plan.

Through the pre-application and application stages of the resource consent process, this design guide will ensure new development is designed to a quality standard that contributes to our city goals and our design principles. In addition, it guides new developments to have a positive impact on environmental infrastructure, neighbouring sites and adjacent public spaces while delivering efficient, successful site layouts and quality buildings for the end-user.

This Design Guide should inform preapplication and application discussions between applicants and Council; and assist Council urban designers and planning professionals in preparing clear, consistent commentary in their assessment of proposals. It will have the greatest impact when used collaboratively between design disciplines from the early stages of any design process.

If the principles, outcomes and best-practice guidance contained in this Design Guide are embraced, Wellington can look forward to new development that is safe, attractive, meaningful and resilient; that enables our city to grow and change in response to the evolving needs of our communities and future generations.

Design Principles

Following on from a number of engagement opportunities with the community as part of Planning for Growth, Wellington City Council has identified six city goals to guide the Spatial Plan, District Plan and related efforts to plan for and support anticipated growth:

1. Partnership with mana whenua
2. Compact
3. Inclusive and connected
4. Greener
5. Resilient
6. Vibrant and prosperous

These goals are used here as design principles that all new developments in Wellington should strive to meet. In the separate Proposed District Plan Design Guide Introduction document which sits as the first Design Guide document under the Design Guide heading in Part 4 of the Proposed District Plan, Council's expectations about what good design needs to achieve in order to meet each design principle are articulated.

Design Outcomes

Design outcomes are intended to support the design principles and achievement of good design across Wellington. While the Design Guides are ultimately outcome-focused, specific guidance should not be used as a strict template or planning rules, nor should it reduce the potential diversity of design approaches taken. Rather, the Council anticipates guidance to be interpreted and used appropriately by resource consent applicants and advisors, so as to achieve good design that meets the overarching outcomes and principles of these Design Guides.

In support of the six design principles, four design outcomes help to coordinate specific guidance across a range of scales, from the wider environment through to individual buildings. These are discussed the separate Proposed District Plan Design Guide Introduction document.

A note about the design process

Achieving good design starts with the alignment of an appropriate budget and design brief, awareness of constraints and opportunities and a strong design team. The use of experienced architects and landscape architects with the relevant professional accreditation is recommended. Some larger projects may be most successful through the collaboration of multiple design practices.

Every stage of a project, from site acquisition, through concept development to detailed delivery, requires a commitment to delivering quality outcomes through good design. The allocation of sufficient budget through robust feasibility studies, a strong design brief, and early engagement with Council contribute to an effective process that supports the delivery of quality outcomes.

74. HS2-P6-Rec9: That submission points relating to clarity regarding application of the Design Guides are accepted/rejected as detailed in Appendix B.

3.5 Mandatory Design Requirements

Matters raised by submitters

75. Greater Brooklyn Residents Association Inc's [459.3] seeks that there should be mandatory design requirements.

Assessment

76. In response to the submission point raised by Greater Brooklyn Residents Association Inc's [459.3], the Design Guide is drafted as an outcome-based documents so as not to limit creativity and different approaches to good design outcomes. The absolute mandatory requirements are stated in the policies and standards of the PDP. The highly ranked guidelines are established ways to achieve the outcomes of the Design Guides.
77. Accordingly, I consider that mandatory design requirements would be too specific and do not provide the flexibility needed for a site by site design assessment for each development. I note that the Design Guides having a rating system which establishes a hierarchy of guidelines without requiring that all or some guidelines *must* be implemented.

Summary of recommendations

78. HS2-P6-Rec10: For the reasons set out in my assessment above, I recommend no corresponding changes to the Design Guides in relation to [459.3] in terms of mandatory design requirements as detailed in Appendix B.

3.6 Location-based Design Guides

Matters raised by submitters

79. Alan Fairless [242.25] seeks that the PDP strengthen the urban design qualities of the city through a more sophisticated approach to design guidance, in particular the use of local Design Guides tailored to local areas.
80. Carolyn Stephens [344.13] seeks that urban design qualities be strengthened in the Design Guides, in particular the use of local Design Guides tailored to local areas.
81. Elizabeth Nagel [368.18] seeks that the PDP be amended to encompass more new developments as controlled activities in respect to urban design. Elizabeth Nagel [368.19] also seeks that urban design qualities be strengthened in Design Guides.
82. VicLabour [414.56] seeks a greater emphasis on recognising history of places and sites in a way that is not settler perspective dominant.
83. Alan Fairless [242.26] seeks that local Design Guides, tailored to local areas, are created and used to strengthen the urban design qualities of the city. The Retirement Villages Association [FS126.5] and Ryman Healthcare [FS128.5] seek that 242.26 is disallowed.

Assessment

84. In relation to the submission points from Alan Fairless, Elizabeth Nagel and VicLabour [242.25, 368.18, 414.56 and 242.26], the Retirement Villages Association's further submission point [FS126.5] and Ryman Healthcare Limited's further submission point [FS128.5] - the Design Guides were purposely worded to be general in order to be able apply to any area, instead of being suburb, block or property specific. The Design Guides under the PDP in terms of approach, are moving away from area specific guidelines that currently sit within the ODP. I also note that it is the role of urban design advisors to apply the Design Guides based on the local context and as referred to by G1 of the Design Guides. I consider that it is appropriate that the Design Guides are drafted at a high level. A contextual analysis as is directed by the guides will help ensure that development is responsive to the local context. I also note that where relevant (e.g. the character precinct design guide) some area specific guidance is provided.
85. Regarding Carolyn Stephens and Elizabeth Nagel's submission points [344.13 and 368.19], the Design Guides have been drafted to help ensure well designed buildings.

Summary of recommendations

86. HS2-P6-Rec11: No amendments are recommended in response to submission points on location-based Design Guides.
87. HS2-P6-Rec12: That submission points relating to location-based Design Guides are accepted/rejected as detailed in Appendix B.

3.7 Rationalisation of the Design Guides

Matters raised by submitters

88. McIndoe Urban Limited [135.9, 135.10 and 135.11] seek that the content of the Design Guides is restructured to eliminate repetition within individual Design Guides and edit to ensure consistency of expression of guidelines.
89. Wellington City Youth Council [201.42] seeks that the Design Guides are clear and concise to facilitate easier access and accessible knowledge about design standards.
90. Kāinga Ora [391.767] seeks to amend the design guidelines to clarify and simplify them. The Retirement Villages Association [FS126.167] and Ryman Healthcare [FS128.167] support the submission point as it relates to the removal of design guidelines and otherwise disallow the point in line with their submissions.
91. Stratum Management Limited [249.41] seeks rationalisation of the Residential Design Guide to reduce the number of guidelines as much as possible.

Assessment

92. In response to the submission points raised by McIndoe Urban Limited [135.9, 135.10 and 135.11], Wellington City Youth Council [201.42] and Kāinga Ora [391.767 (supported by The Retirement Villages Association FS126.167 and Ryman Healthcare FS128.167)], Design Guides need to be standalone documents as not all design guidelines (or guides) will apply in every situation. Some minor refinements have been made which are addressed in individual design guide submission responses. There is some scope to consolidate guidelines and minor refinements have been made. However, because not all of the Design Guides will apply all at once, repeating design guidance is not an issue.
93. In response to the submission point raised by Stratum Management Limited [249.41], some rationalisation has been recommended in other parts of this report where deemed fit.

Summary of recommendations

94. HS2-P6-Rec13: No amendments are recommended in response to submission points 135.9, 135.10, 135.11, 201.42, 391.767 and 249.41.

95. HS2-P6-Rec14: That submission points relating to rationalisation of the Design Guides are accepted/rejected as detailed in Appendix B.

3.8 Sunlight and Daylight

Matters raised by submitters

96. Roland Sapsford [305.64] seeks reinstatement of the ODP design guidance for minimum sunlight access.
97. Guy Marriage [407.10] considers that access to natural light and daylight and sunlight is just as important in the Inner City Housing as it is in suburban areas. No specific decision is requested.

Assessment

98. In response to the submission point raised by Roland Sapsford [305.64], an appropriate level and extent of sun access has not been included in design guidelines in order to keep design guidance general and flexible for guidelines. The Design Guides step away from a specific hour provision in order to enable site specific responses and flexibility. I also note that the MDRS standards do not require standards for the minimum amount of sunlight, rather focus on outlook.
99. Regarding the submission point raised by Guy Marriage [407.10], I acknowledge the importance of design guidelines regarding natural light and sunlight applying to all residential areas in the city, not just outer suburbs. Hence, why the Residential Design Guide guidelines apply to all residential zones and the Centres and Mixed Use Zones, not just residential zones.
100. However, I consider that access to long hours of sunlight may not be practically possible in certain scenarios, including where NPS-UD requires higher density development, or where the natural topography of the land limits the sunlight access. In these scenarios it would be expected the applicant to provide other amenities such as better access to private or communal open space.

Summary of recommendations

101. HS2-P6-Rec15: No amendments are recommended in response to submission points 305.64 and 407.10.
102. HS2-P6-Rec16: That submission points relating to sunlight and daylight are accepted/rejected as detailed in Appendix B.

3.9 Three Waters Design Guidance

Matters raised by submitters

103. VicLabour [414.54] seeks to retain design guidance relating to mitigating storm water and water conservation.
104. Greater Wellington Regional Council [351.333] seeks that Design Guides are amended as necessary to give effect to the NPS-FM, including by rating freshwater guidelines to recognise their importance. Wellington City Council Environmental Reference Group [FS112.19] seeks that 351.333 be allowed. The Retirement Villages Association [FS126.65] and Ryman Healthcare [FS128.65] seek that 351.333 be disallowed.
105. Greater Wellington Regional Council [351.335] seeks to reference the Regional Standard for Water Services in the Design Guides. The Retirement Villages Association [FS126.67] and Ryman Healthcare [FS128.67] seek that 351.335 be disallowed.
106. Greater Wellington Regional Council [351.336] seeks to ensure emphasis on water conservation throughout guides, including mandate for the use of rainwater tanks and other best practices for water conservation such as low-flow devices, in new developments. The Retirement Villages Association [FS126.68] and Ryman Healthcare [FS128.68] seek that 351.336 be disallowed.
107. Greater Brooklyn Residents Association Inc's [459.16] seeks that water conservation would be mandatory in the Design Guides.

Assessment

108. I acknowledge the submission point by VicLabour [414.54].
109. In response to the submission point from Greater Wellington Regional Council [351.333 (supported by Wellington City Council Environmental Reference Group FS112.19 and opposed by The Retirement Villages Association FS126.65 and Ryman Healthcare Limited FS128.65)]:
 - a. I consider that the Design Guides (Residential and Centres and Mixed Use) have clear headings in the Design Guides for stormwater and water conservation.
 - b. I note that the Design Guides also have design guidelines on ecology which speak to regenerating waterways and enhancing stream ecology and that mandatory requirements would risk stepping outside of the Council's RMA jurisdiction.
 - c. I note that the Three Waters PDP also gives effect to the NPS-FM.
 - d. Whilst there is design guidance, I consider that the site-specific water concerns are largely dealt with through PDP standards or the Building Code.
110. Regarding the submission point from Greater Wellington Regional Council [351.335 (opposed by The Retirement Villages Association FS126.67 and Ryman Healthcare Limited FS128.67)], the Regional Standard for Water Services are referenced in the PDP's Three Waters chapter and is a district-wide matter (not zone based) and does not need to also be referenced in the Design Guides.

111. In response to the submission point from Greater Wellington Regional Council [351.336 (opposed by The Retirement Villages Association FS126.68 and Ryman Healthcare Limited FS128.68)], both the Centres and Mixed Use Design Guide and Residential Design Guide have a guideline speaking to water conservation methods and retention being recommended to be integrated into the landscape and building design. This includes suggested methods. The Residential Design Guide suggests developers consider grey water reuse and circular water systems for washing and cleaning purposes.
112. In response to the submission point from Greater Brooklyn Residents Association Inc [459.16], no design guidance is mandatory as they are guidelines and design principles but not standards. Instead, the Design Guides have a dot rating system with three dots having the highest priority and I consider this appropriate.

Summary of recommendations

113. HS2-P6-Rec17: No amendments are recommended in response to submission points on three waters design guidance.
114. HS2-P6-Rec18: That submission points relating to three waters design guidance are accepted/rejected as detailed in Appendix B.

3.10 Use of Urban Design Panels

Matters raised by submitters

115. Willis Bond and Company Limited [416.204] seeks that Council consider a Design Excellence Panel (or similar) which is constituted for each project (with representatives agreed by Council and the developer) and is charged with ensuring the development achieves the quality urban outcomes sought by Council. Submitter notes that provided approval is obtained from the Design Excellence Panel, Council would not have discretion to consider urban outcomes (to ensure there is no overlap of roles between Council and the Design Excellence Panel). The Retirement Villages Association [FS126.266] and Ryman Healthcare [FS128.266] support the submission point as it relates to the removal of design guidelines and otherwise disallow the point in line with their submissions.
116. Willis Bond and Company Limited [416.3] also seeks that a 'Design Excellence Panel' be constituted for each significant development and be solely responsible for assessing design outcomes of projects.
117. Historic Places Wellington [182.32] considers that urban design panels could be used as part of the assessment process [of the new multi unit design guide]. No specific decision is requested.

Assessment

118. In response to the submission of Willis Bond and Company Limited [416.204 and 416.3] and further submission, [FS126.266] and [FS128.266], Historic Places Wellington [182.32] the establishment of an Urban Design panel is a work in progress.
119. The City Outcomes Contribution mechanism included design panels as a potential outcome. The City Outcomes Contribution will be addressed in Hearing Stream 4.

Summary of recommendations

120. HS2-P6-Rec19: No amendments are recommended in response to submission points on the use of urban design panels.
121. HS2-P6-Rec20: That submission points relating to design panel are accepted/rejected as detailed in Appendix B.

3.11 Partnering with Mana Whenua

Matters raised by submitters

122. Wellington City Youth Council [201.47] considers that partnering with mana whenua especially for high impact urban developments is essential to weaving te ao Māori throughout the urban landscape. No specific decision is requested.

Assessment

123. Regarding the submission point of Wellington City Youth Council [201.47], one of the key principles of the Design Guides is undertaking a contextual analysis which includes responding to the whakapapa of the place.
124. The Design Guides ensure the integration of mana whenua identities, worldviews and practice into the city. The design guide principle directs that good design is based on meaningful engagement with mana whenua partners where development is significant i.e. in terms of size, location etc. Good design reinforces and re-establishes mana whenua identities in new design and development and strengthens through design, the values and worldviews articulated by mana whenua.

Summary of recommendations

125. HS2-P6-Rec21: No amendments are recommended in response to submission point [201.47].
126. HS2-P6-Rec22: That submission points relating to partnering with mana whenua are accepted/rejected as detailed in Appendix B.

3.12 Te Ao Māori Perspective

Matters raised by submitters

127. VicLabour [414.55] seeks that ecology guidelines should incorporate a te ao Māori perspective.

Assessment

128. In response to the submission of VicLabour [414.55], Te Ao Māori is addressed throughout the Design Guides. It is the core focus of all the Design Guides, including responding to effects on waterways, responding to the whakapapa of the place and recognising the unique qualities of the whenua.

Summary of recommendations

129. HS2-P6-Rec23: No amendments are recommended in response to submission point [201.47] on the te ao Māori perspective.
130. HS2-P6-Rec24: That submission points relating to Te Ao Māori perspective are accepted/rejected as detailed in Appendix B.

3.13 Sustainability

Matters raised by submitters

131. Wellington City Youth Council [201.45] seeks that Design Guides reward the use of environmentally sustainable building materials to promote climate friendly development.
132. VicLabour [414.58] seeks that a low emissions design guide be made compulsory.
133. Greater Brooklyn Residents Association Inc's [459.15] seeks that all new developments must have solar or wind for communal lighting and heating, and that a 'must' have rather than a negotiation to get more height and induce more shading for others, if it is installed.

Assessment

134. In response to 201.45 and 459.15, guideline G8 already seeks that buildings are orientated to maximise solar access to improve energy efficiency. No design guidance is mandatory as they are guidelines and design principles but not standards. Instead the Design Guides have a dot rating system with three dots having the highest priority. Solar and wind energy efficiency is provided for under the Renewable Energy section of the PDP.
135. Regarding 414.58, guidelines in the Centres and Mixed-Use and Residential Design Guides sufficiently address low emission building design outcomes.

Summary of recommendations

136. HS2-P6-Rec25: No amendments are recommended in response to submission points on sustainability.
137. HS2-P6-Rec26: That submission points relating to sustainability are accepted/rejected as detailed in Appendix B.

3.14 Design Quality

Matters raised by submitters

138. Alan Fairless [242.24] seeks that the PDP is amended to encompass more new developments as controlled activities in respect of urban design and that this process is tied to community-level Design Guides as they are developed.
139. Craig Palmer [492.49] seeks that Design Guides are introduced for all verandahs.
140. Living Streets Aotearoa [482.62] seeks that the Design Guides ensure that there are no blank frontages. The Retirement Villages Association [FS126.174] and Ryman Healthcare [FS128.174] seek that 482.62 be disallowed.
141. Living Streets Aotearoa [482.63] seeks that the Design Guides ensure that entryways are designed so people entering buildings can move off the public space while they do that (e.g. while they find their keys or seek permission to enter). The Retirement Villages Association [FS126.175] and Ryman Healthcare [FS128.175] seek that 482.63 be disallowed.
142. Living Streets Aotearoa [482.64] seeks that the Design Guides ensure that buildings do not unduly shade public space unless they are providing a verandah. The Retirement Villages Association [FS126.176] and Ryman Healthcare [FS128.176] seek that 482.64 be disallowed.
143. Living Streets Aotearoa [482.65] seeks that the Design Guides ensure that design does not generate wind problems. The Retirement Villages Association [FS126.177] and Ryman Healthcare [FS128.177] seek that 482.65 be disallowed.

Assessment

144. Regarding the submission point from Alan Fairless [242.24], I consider that the current rule framework as proposed in the PDP is sufficient to ensure that urban design is considered for all developments. The rule framework integrates Design Guides to ensure design assessments against the design guidelines in a development by development basis. I consider that community-level Design Guides are not required given that they require a contextual analysis and have been created to be general and provide sufficient flexibility to ensure good design outcomes. The Design Guides under the PDP have moved away from a localised, area-specific focus for the most part (with the exception of the character Design Guides).

145. In response to the submission point from Craig Palmer [492.49], I consider that the current rule framework as proposed in the PDP sufficiently accounts for verandahs and that a new Design Guide for verandahs, or adding new guidelines for verandahs into existing Design Guides, is not required.
146. In response to the submission point from Living Streets Aotearoa [482.62] and accept the further submission points from Retirement Villages Association [FS126.174] and Ryman Healthcare [FS128.174], the Design Guides as notified in the PDP already adequately address blank frontages.
147. Regarding the submission point from Living Streets Aotearoa [482.63] and the further submissions from The Retirement Villages Association [FS126.175] and Ryman Healthcare [FS128.175], in my view, the Design Guides as notified in the PDP have already provided sufficient guidance on entryways.
148. Regarding the submission point from Living Streets Aotearoa [482.64] and the further submissions from The Retirement Villages Association [FS126.176] and Ryman Healthcare [FS128.176], I consider that the policies and standards in the PDP and relevant design guidelines sufficiently address shading of public space.
149. In response to the submission point from Living Streets Aotearoa [482.65] and the further submission points from The Retirement Villages Association [FS126.177] and Ryman Healthcare [FS128.177], I consider that the PDP's Appendix 14 – Wind Chapter Best Practise Guidance Document addresses wind generation concerns from building design and a new guideline addressing this is unnecessary.

Summary of recommendations

150. HS2-P6-Rec27: No amendments are recommended in response to submission points on design quality.
151. HS2-P6-Rec28: That submission points relating to design quality are accepted/rejected as detailed in Appendix B.

3.15 Accessibility

Matters raised by submitters

152. Amos Mann [172.26] seeks that accessibility and universal design requirements are provided for in the Design Guides and in incentives. The Retirement Villages Association [FS126.6] and Ryman Healthcare [FS128.6] seek that 172.26 be disallowed.
153. Wellington City Youth Council [201.44] seeks that new builds and developments are required to be safe for those with different access needs.

154. VicLabour seeks:
- a. [414.51] the prioritisation of pedestrian experience, including the emphasis on accessibility, for subdivisions.
 - b. [414.52] that the Council considers recommendations from disabled people and advocates and explore co-design with remuneration where appropriate.
 - c. [414.57] the Design Guides include direction that within walking catchments of the central city transport links car parking may not be required, with emphasis on accessibility.

Assessment

155. The Design Guides contain guidelines relating to accessibility. The Building Code also addresses accessibility and the district plan cannot be more stringent.
156. In response to the submission point from Amos Mann [172.26] and the further submission points from The Retirement Villages Association [FS126.6] and Ryman Healthcare [FS128.6] accessibility and universal design guidance is provided through the Residential Design Guide and the Centres and Mixed Use Design Guide.
157. I acknowledge the submission point from Wellington City Youth Council [201.44].
158. I acknowledge the submission points from VicLabour [414.51 and 414.52]. The Subdivision Design Guide, Residential Design Guide and the Centres and Mixed Use Design Guide also address pedestrian experience and accessibility.
159. In response to the submission point from VicLabour [414.57], I consider that the Design Guides provide sufficient guidance on walking and accessibility.

Summary of recommendations

160. HS2-P6-Rec29: No amendments are recommended in response to submission points on accessibility.
161. HS2-P6-Rec30: That submission points relating to accessibility are accepted/rejected as detailed in Appendix B.

3.16 Waste Minimisation

Matters raised by submitters

162. VicLabour [414.53] seeks that provisions for waste minimisation should be strengthened where possible.

Assessment

163. In response to the submission point from VicLabour [414.53], the guidelines in the Centres and Mixed Use Guide and the Residential Design Guide refer to Councils regulatory guidance on the Solid Waste Management and Minimisation Bylaw (2020). I consider that no further guidance is required on waste minimisation given the bylaw and to avoid duplication and misalignment with the bylaw.

Summary of recommendations

164. HS2-P6-Rec31: No amendments are recommended in response to submission point [414.53] on waste minimisation.
165. HS2-P6-Rec32: That submission points relating to waste minimisation are accepted/rejected as detailed in Appendix B.

4.0 Design Guide Introduction

166. In this section I refer to submissions specific to the 'Introduction' section¹ of the Design Guides.

Matters raised by submitters

167. McIndoe Urban Limited [135.8] oppose the Design Guide Introduction and seek that it is removed from the PDP.

Assessment

168. In response to McIndoe Urban Limited's submission point [135.8], I consider that the Design Guide introduction is an important document that provides context to the way the Design Guides have been set up, their design principles, design outcomes and how the design process works. This is important information that should be included as a statutory document like the rest of the guidelines.

Summary of recommendations

169. HS2-P6-Rec33: No amendments are recommended in response to submission point [135.8] on Design Guide Introduction.
170. HS2-P6-Rec34: That submission points relating to Design Guide Introduction are accepted/rejected as detailed in Appendix B.

¹ Proposed District Plan Introduction Section of the Design Guides:
<https://eplan.wellington.govt.nz/proposed/rules/0/332/0/0/0/31>

5.0 Residential Design Guide

171. This section addresses submissions specific to the 'Residential Design Guide'².

5.1 Changes to the application of Residential Design Guide

Matters raised by submitters

172. Brett McKay [69.3] opposes the Residential Design Guide relating to residential development within the inner residential suburbs of the city and seeks that the Residential Design Guide does not apply to the inner residential suburbs of the city (supported by Richard Murcott [FS71.4]).
173. Bruce Rae [334.6] seeks that the Residential Design Guide Appendices be amended to have an additional scope guidance at the start of appendices, so as to clarify the scope of required assessments.
174. Anita Gude and Simon Terry [461.33] seek that Council include a requirement in the "Guiding Principles" in the Residential (Character Precincts) Design Guide (page 5-9) that *"Applicants must demonstrate that the provisions of this Design Guide have been acknowledged and interpreted and their objectives satisfied"*.
175. Dinah Priestly [495.3 and 495.4] seeks that the Residential Design Guide is re-written to achieve reasonable intensification whilst maintaining and enhancing the existing valued housing stock. The submitter notes that the Guide will need to recognize both residential character and heritage qualities ensure appropriate implementation (these submission points are supported by Thorndon Residents' Association Inc [FS69.64 and FS69.65]).

Assessment

176. In response to Brett McKay's submission point [69.3] and Richard Murcott's further submission point [FS71.4]), I consider that the Residential Design Guide must apply to both inner and outer residential suburbs of the city as a plan wide approach for all residential activity and developments. I do not recommend a change.
177. The Design Guides are currently statutory documents under the ODP (except for the Papakāinga Design Guide) and will continue to be for the PDP. Given the level of intensification anticipated under the PDP, it is important that the PDP includes statutory design guidance to achieve good built form, design and environmental outcomes for the City.
178. Regarding Bruce Rae's submission point [334.6], I note that the Council has the 'Introduction' document as the first section of the Design Guides (as discussed above). The Introduction addresses these matters and includes a note about the design process, the design outcomes

² Proposed District Plan Residential Design Guide:
<https://eplan.wellington.govt.nz/proposed/rules/0/325/0/0/0/31>

of the Design Guides, design principles and guidance for which Design Guides and appendices to consider. I consider that further clarity is not needed.

179. Regarding, Anita Gude and Simon Terry's submission point [461.33], I consider that no design guidance is mandatory as they are guidelines and design principles but not standards. Instead, the Design Guides have a dot rating system with three dots having the highest priority.
180. In response to Dinah Priestly's submission points [495.3 and 495.4] and Thorndon Residents' Association Inc's further submission points [FS69.64 and 69.65], I note that the plan needs to enable intensification to meet our requirements under the Housing and Business Analysis assessments, the NPS-UD, MDRS and to meet the housing needs of our growing population. At the same time, density needs to be done well and new development needs to respect existing heritage and character buildings, amongst other important areas that add to Wellington's sense of place. Council considers that these are sufficiently provided for under the Residential Design Guide and the Heritage Design Guide.

Summary of recommendations

181. HS2-P6-Rec35: No amendments are recommended in response to submission points on changes to the application of and assessments under the Residential Design Guide.
182. HS2-P6-Rec36: That submission points relating to changes to the application of and assessments under the Residential Design Guide are accepted/rejected as detailed in Appendix B.

5.2 Removal of Residential Design Guide or make non-statutory for some developments

Matters raised by submitters

183. Philippa O'Connor [289.39 and 289.40] seeks that the Design Guides be removed as part of the statutory framework of the PDP, that they are not a statutory requirement in respect of restricted discretionary activities and that the guidelines in the Design Guides are included within the zone-based rules as standards or matters of discretion.
184. Retirement Villages Association of New Zealand Incorporated [350.306] opposes the Residential Design Guide and seeks amendment to expressly exclude retirement villages from having to apply the Residential Design Guide.
185. Metlife Care Limited [413.43, 413.44 and 413.45] seek to amend the Residential Design Guide to make it clear that it does not apply to retirement village development, as well as seeking that the Residential Design Guide is provided as a guidance tool only that sits outside the District Plan.

186. Willis Bond and Company Limited [416.210] seek that the Residential Design Guide be made non-statutory (submission point supported by The Retirement Villages Association of New Zealand Incorporated [FS126.272] and Ryman Healthcare Limited [FS128.272]).
187. Willis Bond and Company Limited [416.199 and 416.205] seek that HRZ-S16 (Maximum building depth for multi-unit housing or a retirement village) and HRZ-S17 (Minimum building separation distance for multi-unit housing or a retirement village) be included in a non-statutory Design Guide (submission point 416.205 is supported by The Retirement Villages Association of New Zealand Incorporated [FS126.267] and Ryman Healthcare Limited [FS128.267]).
188. Retirement Villages Association of New Zealand Incorporated [350.67] opposes the Residential Design Guide and seeks amendment to expressly exclude retirement villages from having to apply the Residential Design Guide.

Assessment

189. In response to Phillippa O'Connor's submission points [289.39 and 289.40], Willis Bond and Company Limited's submission point [416.210], The Retirement Villages Association of New Zealand Incorporated's further submission point [FS126.272] and Ryman Healthcare Limited's further submission point [FS128.272] - the Design Guides have always been and continue to be statutory documents (except for the Papakāinga Design Guide) with references required in the PDP to link back to the Design Guides.
190. Regarding The Retirement Villages Association of New Zealand Incorporated's submission point [350.306] [350.67], Metlife Care Limited's submission points [413.43, 413.44 and 413.45], I consider that the Design Guides are designed to apply to all developments and specific exclusions or carve outs for specific activities or types of developments are not supported. The principles and outcomes of the Design Guides are considered relevant to retirement villages too. Of course, there will need to be flexibility in how these are applied with respect to retirement villages.
191. Regarding Willis Bond and Company Limited's submission points [416.199 and 416.205], The Retirement Villages Association of New Zealand Incorporated's further submission point [FS126.267] and Ryman Healthcare Limited's further submission point [FS128.267], I note that the Design Guides are currently statutory documents under the ODP (except for the Papakāinga Design Guide) and will continue to be for the PDP. Given the level of intensification anticipated under the PDP, it is important that the PDP includes statutory design guidance to achieve good built form, design and environmental outcomes for the City. The Council is seeking to retain the depth control HRZ-S16 and the minimum building separation distance control HRZ-S17 and I do not see the need to put these in a design guide.

Summary of recommendations

192. HS2-P6-Rec37: No amendments are recommended in response to submission points on removal of the Residential Design Guide or the request to make this non-statutory, subject to any consequent amendments in this report that I approve of.
193. HS2-P6-Rec38: That submission points relating to removal of Residential Design Guide or make non-statutory are accepted/rejected as detailed in Appendix B.
194. HS2-P6-Rec39: I recommend that the Residential Design Guide continues to apply to retirement villages and all other forms of residential activities and dwellings.

5.3 Retention of the Residential Design Guide within the District Plan

Matters raised by submitters

195. Claire Nolan, James Fraser, Biddy Bunzl, Margeret Franken, Michelle Wolland, and Lee Muir [275.50] seek that the Residential Design Guide is retained as notified.
196. Jane Szentivanyi and Ben Briggs [369.18] seek that the Residential Design Guide, especially the mention of embodied energy, and the benefits of sunlight access, are retained as notified.
197. Te Rūnanga o Toa Rangatira [488.97] seeks that the Residential Design Guide is retained as notified.
198. Wellington City Youth Council [201.43] considers the importance of high quality, high density residential development and urban form, ensuring that people have access to green spaces, light, warmth, and air, high quality, sustainable materials should be a focus for buildings and infrastructure that stands the test of time, and ensuring spaces are clean, welcoming and have an attractive aesthetic are also immensely important to contribute to wellbeing for everyone in the city. No specific decision is requested.
199. Greater Wellington Regional Council [351.11] seeks strengthen reference to Residential Design Guide to require consistency with, or appropriate consideration of, its guidelines (this submission point is opposed by The Retirement Villages Association of New Zealand Incorporated [FS126.53] and Ryman Healthcare Limited [FS128.53]).

Assessment

200. I acknowledge the submission point by Claire Nolan, James Fraser, Biddy Bunzl, Margeret Franken, Michelle Wolland, and Lee Muir [275.50].
201. I acknowledge the submission points by Jane Szentivanyi and Ben Briggs [369.18 and 369.19].
202. I acknowledge the submission point by Te Rūnanga o Toa Rangatira [488.97].

203. I acknowledge the submission point by Wellington City Youth Council [201.43]. These matters are addressed in the Residential Design Guide.
204. In response to Greater Wellington Regional Council's submission point [351.11], The Retirement Villages Association of New Zealand Incorporated's further submission point [FS126.53] and Ryman Healthcare Limited's further submission point [FS128.53], I consider that the PDP has the necessary hooks to the Residential Design Guide through the associated policy and rule frameworks of the applicable zones. I accept.

Summary of recommendations

205. HS2-P6-Rec40: No amendments are recommended in response to submission points on the retention of the Residential Design Guide, subject to any consequent amendments in this report that I approve of.
206. HS2-P6-Rec41: That submission points relating to retention of the Residential Design Guide are accepted/rejected as detailed in Appendix B.

5.4 Rationalisation of Provisions

Matters raised by submitters

207. Wellington Branch NZIA [301.17] seeks clarification in the Residential Design Guide as the submitter considers the Design Guide to be vague (opposed by The Retirement Villages Association of New Zealand [FS126.229] and Ryman Healthcare Limited's [FS128.229]).

Assessment

208. In response to Wellington Branch NZIA's submission point [301.17], The Retirement Villages Association of New Zealand's further submission point [FS126.229] and Ryman Healthcare Limited's further submission point [FS128.229], I do not consider the Design Guides to be vague. Some changes have been made for rationalisation as discussed elsewhere in this report to provide more clarity as needed. The Design Guides are intended to be general enough to provide sufficient flexibility for case-by-case assessments.

Summary of recommendations

209. HS2-P6-Rec42: No amendments are recommended in response to submission points on rationalisation of provisions, subject to any consequent amendments in this report that I approve of.
210. HS2-P6-Rec43: That submission points relating to rationalisation of provisions are accepted/rejected as detailed in Appendix B.

5.5 Area/zone-specific Residential Design Guide guidelines

Matters raised by submitters

211. Dennis Michael Hunt [119.3] seeks that more refined design concepts are established for the HRZ (High Density Residential Zone) block of properties between Aurora Terrace, Bolton Street, the Urban Motorway, and Wesley Road.
212. Guy Marriage [407.13] seeks that the Residential Design Guide is split into three parts redesigned to adequately reflect the different residential zones in the PDP.
213. Wellington Branch NZIA [301.16] seeks that the Residential Design Guide be split into three parts: low-end Medium Density Residential, high-end City Centre Zone and all zones in between (opposed by The Retirement Villages Association of New Zealand Incorporated [FS126.228] and Ryman Healthcare Limited [FS128.228]).
214. Guy Marriage [407.16] seeks that guidance on the MRZ (Medium Density Residential Zone) is expanded.
215. Guy Marriage [407.17] seeks that guidance on the HRZ (High Density Residential Zone) is expanded.

Assessment

216. In response to Dennis Michael Hunt's submission point [119.3], the Residential Design Guide was purposely worded in a generalised manner to be able to apply to any area, instead of being suburb, block or property specific. The Design Guides under the PDP have moved away from the approach in the ODP's Design Guides of having location specific design guidance, with the exception being the Character Precincts and Mount Victoria North Townscape Precinct Design Guides. Guidelines have been generalised so that they have the flexibility to be applied to a variety of locations, sites and developments.
217. Regarding Guy Marriage's submission point [407.13], the Residential Design Guide Guidelines are designed to be general to be able to apply to different zones, areas, sites and developments.
218. Regarding Wellington Branch NZIA's submission point [301.16], The Retirement Villages Association of New Zealand Incorporated's further submission point [FS126.228] and Ryman Healthcare Limited's further submission point [FS128.228], I consider that the Residential Design Guide guidelines are designed to be general to be able to apply to different zones. The design guidelines apply to the context of the site.
219. In respect to Guy Marriage's submission points [407.16 and 407.17], I consider that the guidelines are designed to be general to be able to apply to different zones. The whole of the Residential Design Guide applies to the Medium Density Residential Zone and the High Density

Residential Zone and I consider that the Residential Design Guide guidelines are sufficient to address design outcomes in both these zones.

Summary of recommendations

220. HS2-P6-Rec44: No amendments are recommended in response to submission points on area/zone-specific Residential Design Guide guidelines.
221. HS2-P6-Rec45: That submission points relating to area/zone-specific Residential Design Guide guidelines are accepted/rejected as detailed in Appendix B.
222. HS2-P6-Rec46: I recommend that the Residential Design Guide is retained as notified, subject to any changes that I recommend in this report.

5.6 Responding to Whakapapa of Place (G1 -G2)

Matters raised by submitters

223. McIndoe Urban [135.69] seeks that the heading 'Responding to whakapapa of place' is amended as follows:

~~Responding to whakapapa of place~~ Responding to context

The site's natural form, the history of its development, key environmental attributes and any significant cultural values associated with it play a significant role in successful design outcomes.

224. McIndoe Urban [135.70] seeks that G1 is amended to read: "... should include, where relevant, the following:".

Prepare a contextual analysis that depicts how the development proposal positively contributes to the surrounding area. Contextual analysis should include, where relevant, the following:

...

225. McIndoe Urban [135.71] also seeks that G1 (Responding to whakapapa of place) and G2 (Responding to whakapapa of place) of the Residential Design Guide are integrated.
226. Tapu-te-Ranga Trust [297.35] seeks that G2 (Responding to whakapapa of place) is retained as notified.

Assessment

227. In response to the submission point made by McIndoe Urban [135.69], I consider it is important to retain reference to 'whakapapa' because this reflects the steps the Design Guides have taken to include a te ao Māori lens.

228. Regarding the McIndoe Urban’s submission point [135.70]:
- a. When doing a development and reviewing G1, the applicant should do a context analysis and comment on relevant context only to that site and development. I consider that wording should be altered to reflect that it is not expected that all listed items are expected to be considered ‘relevant context’ for all developments. Amending the wording to refer to ‘where possible’ would make it clearer for applicants that not all points will apply. This will reduce interpretive ambiguity.
 - b. That for the orange text which are examples, this could be updated to acknowledge that these are examples.
229. In response to McIndoe Urban’s submission point [135.71], I consider there to be an importance difference between guideline G1 and guideline G2. G1 is about what is existing in terms of context, and G2 is about the proposed response to the existing context. I consider it would be inappropriate to rationalise these two guidelines into one when they focus on two separate situations.
230. I acknowledge the submission point from Tapu-te-Ranga Trust [297.35].

Summary of recommendations

231. HS2-P6-Rec47: I recommend that:
- a. The heading for G1 and G2 “Responding to whakapapa of Place” is retained as notified.
 - b. That G1 and G2 remain separate guidelines and are not rationalised.
 - c. That G1 is amended as follows:

Prepare a contextual analysis that depicts how the development proposal positively contributes to the surrounding area. Contextual analysis should include, where relevant, the following:

- » Natural environment
- » Cultural context
- » Te Ao Māori
- » Heritage context
- » Streetscape
- » Movement
- » Site characteristics
- » Built form
- » Land use
- » Urban structure
- » Opportunities and constraints

Such analysis needs to contain an assessment of the following examples:

- Block sizes/grain*
- Frontage widths*
- Spaces between buildings (side yards)*
- Connections to parks, reserves and public spaces*
- Alignment of key elevation lines (including roofs, cornices, parapets, verandahs and floor lines)*
- Orientation to the street*
- Landform*
- Local vegetation scale and type*
- Materials, finishes and textures*

232. HS2-P6-Rec48: That submission points relating to responding to whakapapa of place are accepted/rejected as detailed in Appendix B.

5.7 Vegetation and planting, urban ecology, and carbon reduction - natural environment (G3 – G10)

Matters raised by submitters

233. McIndoe Urban Limited [135.72] seek that the content of G3 to G6 (Vegetation and Planting), G7 (Urban Ecology) and G8 to G10 (Carbon reduction - natural environment) of the Residential Design Guide is rationalised.

234. Catherine Underwood [481.34] seek to retain Vegetation and Planting recommendations in the Residential Design Guide (G5, G6 and G10) as notified.
235. Catherine Underwood [481.33] seeks that the Residential Design Guide be amended to require solar or wind for communal lighting and heating.
236. Catherine Underwood [481.35] seeks that the Residential Design Guide be amended to clarify that trees will actively be protected from development.

Assessment

237. Regarding the submission point from McIndoe Urban Limited [135.72], I consider that there is nothing to be gained from deleting headings and rationalising Guidelines G3 – G10 under only one heading. I consider that these design guidelines cover a variety of matters and warrant being individual guidelines with more accurate retained headings.
238. I acknowledge the submission point by Catherine Underwood [481.34].
239. In response to Catherine Underwood’s submission point [481.33]:
- a. I consider that guideline G8 already seeks that buildings are orientated to maximise solar access to improve energy efficiency.
 - b. No design guidance is mandatory as they are guidelines and design principles but not standards. Instead the Design Guides have a dot rating system with three dots having the highest priority.
 - c. Solar and wind energy efficiency is provided for under the Renewable Energy section of the PDP.
240. Regarding Catherine Underwood’s submission point [481.35], I consider that G5-G7 already addresses protecting and retaining existing trees where possible. Any stronger protection beyond the Design Guides would have to be done via another mechanism, i.e. listing as notable trees in the PDP.

Summary of recommendations

241. HS2-P6-Rec49: No amendments are recommended in response to submission points on vegetation and planting, urban ecology, and carbon reduction – natural environment (G3 – G10), subject to any consequent amendments.
242. HS2-P6-Rec50: That submission points relating to vegetation and planting, urban ecology, and carbon reduction – natural environment (G3 – G10) are accepted/rejected as detailed in Appendix B.

5.8 Designing with topography (G11-G15)

Matters raised by submitters

- 243. McIndoe Urban Limited [135.68] seek that G12 and G13 (Designing with Topography) of the Centres and Mixed Use Design Guide are integrated.
- 244. McIndoe Urban Limited [135.73] also seek that G12 (Designing with topography) of the Residential Design Guide is moved to sit under the heading 'Stormwater'.

Assessment

- 245. In response to the McIndoe Urban Limited's submission point [135.68], I consider that these guidelines are different to one another and need to be retained because they relate to different content. G12 is about mitigating the effects of stormwater runoff and G13 is about the design of retaining walls. I consider that the design outputs of G12 and G13 are entirely different. One guideline minimises the need for stormwater management, for example drains, sumps etc and the other minimises the need for retaining walls.
- 246. Regarding McIndoe Urban Limited's submission point [135.73], G12 talks about topography and thus I consider that it should be sitting under its current heading. I consider that it may not apply to all applications that relate to stormwater but it would apply to all applications when changing topography.

Summary of recommendations

- 247. HS2-P6-Rec51: No amendments are recommended in response to submission points on designing with topography and that G12 and G13 be confirmed as notified.
- 248. HS2-P6-Rec52: That submission points relating to G12 and G13 are accepted/rejected as detailed in Appendix B.

5.9 Designing with water (G16 – G20)

Matters raised by submitters

- 249. McIndoe Urban Limited [135.74] seek that G16 (Stormwater) of the Residential Design Guide is edited to avoid repetition.
- 250. McIndoe Urban Limited [135.75] considers the validity of the uses of greywater should be verified in G18. No mention is made of toilet flushing or irrigation, which are common uses for grey water.
- 251. Catherine Underwood [481.36 and 481.37] seeks that G17, G18, G19 and G20 be made mandatory.
- 252. Greater Brooklyn Residents Association Inc's [459.17 and 459.18] seeks amendment that Residential Design Guide G19 and G20 are mandatory.

Assessment

253. In response to McIndoe Urban Limited's submission point [135.74], I consider that not all methods listed in G16 are Water Sensitive Urban Design (WSUD) measures. I do not consider that the guideline is repetitive. The guideline as drafted leaves space for evolving best practice.
254. Regarding McIndoe Urban Limited's submission point [135.75], I note that this guideline has only a one dot rating under the Design Guides' rating system. It does not limit consideration as part of the resource consent application and allows for evolving best practice.
255. Regarding Catherine Underwood's submission points [481.36 and 481.37], I do not agree that the Design Guides should be mandatory. No design guidance is mandatory as they are guidelines and design principles but not standards. Instead the Design Guides have a dot rating system. I consider that the current rating system is sufficient.
256. The design elements covered in guidelines G17-20 being water conservation methods, retention, reuse, regeneration of waterways, protection and enhancement of native bush are usually resolved later in the process in the building consent process. However, I consider that they need to be considered for site layout and integration.
257. In response to Greater Brooklyn Residents Association Inc's submission point [459.17] [459.18], I do not agree that Design Guides should be mandatory as they are guidelines and design principles, but not standards. Instead the Design Guides have a dot rating system with three dots having the highest priority. I consider that the one dot rating for G19 is sufficient. I consider that enhancing waterways would be best practice but not a minimum requirement for all developments which is what a three dot rating would mean.
258. In response to Greater Brooklyn Residents Association Inc's submission point [459.18], I consider that upon reflection G20 could be better served with a two dot rating and amendments to the guideline to reflect this change in rating, noting the importance of protecting and enhancing existing native bush and significant trees on-site and in the surrounding area. This change in better aligns with Council's strategic focus on increasing existing tree canopy in the city, as well as the alignment with direction in the PDP to protect existing indigenous biodiversity.

Summary of recommendations

259. HS2-P6-Rec53: That submission points relating to G16, G17, G18, G19 and G20 are accepted/rejected as detailed in Appendix B.
260. HS2-P6-Rec54: That G16, G17, G18 and G19 be confirmed as notified.
261. HS2-P6-Rec55: That G20 be amended as follows:

G20. • ~~Where possible, protect and enhance~~ Existing native bush and significant trees on-site and in the surrounding area should be protected and enhanced.

5.10 Ground floor interface and frontage (G21 – G33)

Matters raised by submitters

262. McIndoe Urban Limited [135.76] seek that G25 (Ground floor interface and frontage) of the Residential Design Guide is edited or deleted.
263. McIndoe Urban Limited [135.77] considers that G27 may be relevant for ground floor non-residential activity in centres, but does not fit well with private dining rooms in houses or apartments, but have not sought a specific decision.
264. McIndoe Urban Limited [135.78 and 139.79] seek that G31 (Ground floor interface and frontage) and G33 (Ground floor interface and frontage) of the Residential Design Guide is deleted.
265. Greater Brooklyn Residents Association Inc's [459.19] consider that G24 partially supports a 1.5m-2m minimum setback for the planting of a street scape i.e. trees, but have not sought a specific decision.
266. Wellington Heritage Professionals [412.85] seek that the Residential Design Guide be amended to include G3.5 and the associated diagrams from the current Central Area Urban Design Guide (this submission point is opposed by The Retirement Villages Association of New Zealand Incorporated [FS126.249] and Ryman Healthcare Limited [FS128.249]).

Assessment

267. Regarding McIndoe Urban Limited's submission point [135.76], I disagree that G25 is too broad and undefined. I consider that G25 is clear enough to comprehend. The guideline was crafted to be intentionally broad enough to leave sufficient room for urban design consideration. The guideline is not intended to be descriptive.
268. In response to McIndoe Urban Limited's submission point [135.77] I consider that G27 needs to be amended to better align with the original intent of the design guideline. The intent of the design guideline was to put emphasis on the visual connection between private space and public space to provide passive surveillance. I consider that this intent is not accurately captured by G27 and it requires an amendment for the sake of clarity and alignment with the intent.
269. In response to McIndoe Urban Limited's submission point [135.78], I disagree that the matters included in G31 are matters to be addressed by the Heritage Design Guide. G31 is focused on

residential buildings sympathetically building adjacent to heritage buildings and areas, not about Heritage buildings themselves.

270. Regarding McIndoe Urban Limited's submission point [135.79], I disagree that the matter addressed in G33 is just a construction management issue. There is an opportunity to achieve better design outcomes for hoardings during construction, and I consider that is important that there are guidelines, in both the Centres and Mixed Use Design Guide and Residential Design Guide, to address this.
271. Regarding Greater Brooklyn Residents Association Inc's submission point [459.19], guidelines are not designed to be read as standards. Additionally, no changes are proposed to street trees or setbacks.
272. In response to Wellington Heritage Professionals' submission point [412.85], The Retirement Villages Association of New Zealand Incorporated's further submission point [FS126.249] and Ryman Healthcare Limited's further submission point [FS128.249], I consider that the guideline is explicit enough that it does not require a diagram to support it.

Summary of recommendations

273. HS2-P6-Rec56: That submission points relating to ground floor interface and frontage are accepted/rejected as detailed in Appendix B.
274. HS2-P6-Rec57: That G24, G25, G31 and G33 be confirmed as notified.
275. HS2-P6-Rec58: That G27 be amended as follows:

G27. •• ~~Publicly accessible and relevant private facilities and activities, such as seating for dining, should extend out into public space. Visual connection between publicly accessible and associated private facilities and activities should be provided for passive surveillance. For example, visual connection should be provided between the indoor space of a cafe and any associated outdoor seating in public spaces, on the ground floor of a multi-unit building.~~

5.11 Entrances (G36 – G40)

Matters raised by submitters

276. Nick Ruane [61.6 and 61.7 (opposed by The Retirement Villages Association of New Zealand FS126.186 and FS126.187 and Ryman Healthcare FS128.186 and FS128.187)] and Disabled Persons Assembly New Zealand Incorporated [343.15 and 343.22] seek an amendment to G37 and consider that use of the term 'must' rather than 'should' of the Residential Design Guide provides greater emphasis on the need to meet standards.

G37 •• Entrances ~~should~~ must 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.

277. Nick Ruane [61.8 and 61.9 (opposed by The Retirement Villages Association of New Zealand Incorporated FS126.188 and FS126.189 and Ryman Healthcare Limited FS128.188 and FS128.189)] seeks that G39 is amended to “Dwellings on the ground floor ~~should~~ must have a step-free entry.”

G39 • ~~Where possible, ensure~~ Dwellings on the ground floor must have a step-free entry.

278. Disabled Persons Assembly New Zealand Incorporated [343.16 and 343.23] considers that the use of "where possible" in clause G39 of the Residential Design Guide is not appropriate and does not emphasise the need for greater compliance and uptake from designers, developers and builders. Disabled Persons Assembly New seeks to amend G39 as follows:

G39 • ~~Where possible, ensure~~ dwellings on the ground floor have a step-free entry.

279. McIndoe Urban Limited [135.80] seek that G37 and G39 (Entrances) of the Residential Design Guide are combined.
280. McIndoe Urban Limited [135.81] seeks that G40 (Entrances of the Residential Design Guide is deleted).

Assessment

281. In response to Nick Ruane’s submission points [61.6, 61.7, 61.8 and 61.9] and the Disabled Persons Assembly New Zealand Incorporated’s submission points [343.15 and 343.22], the Retirement Villages Association of New Zealand’s further submission points [FS126.186, FS126.187, FS126.188 and FS126.189] and Ryman Healthcare’s further submission points [FS128.186, FS128.187, FS128.188 and FS128.189], I consider that ‘must’ is too direct and does not provide sufficient flexibility for site by site consideration as part of urban design assessments. The notified drafting provides this flexibility and reflects the rating system approach in the Design Guides and the rating given to this specific guideline.
282. In response to Disabled Persons Assembly New Zealand Incorporated’s submission points [343.16 and 343.23], I consider that ‘ensure’ is too direct by itself without the 'where possible' and does not provide sufficient flexibility for site by site consideration as part of urban design assessments. The 'where possible' reflects that this is a two dot rated guideline. The notified drafting provides this flexibility, and reflects the rating system approach in the Design Guides

and the rating given to this specific guideline. My comments about the District Plan not being able to be more stringent than the Building Code also apply here.

283. Regarding McIndoe Urban Limited's submission point [135.80] that G37 and G39 (Entrances) of the Residential Design Guide be combined, G37 relates to entrances being of an adequate dimension to provide for universal access, whereas G39 speaks to having a step-free entry. G37 has a different dot rating to G39. I consider that G39 which has a lower rating is a nice to have. Because of this it is in my opinion inappropriate to combine them.
284. Regarding McIndoe Urban Limited's submission point [135.81], further clarity could be provided in G40 in terms of application to which canopies and verandas over building entrances apply. Whilst I agree that G40 appears to be more relevant for Centres, the hook in this guideline is for apartments and multi-unit type developments, as opposed to standalone dwellings. I suggest that an amendment is made to reflect this and provide clarification. I do not agree that G40 should be deleted.

Summary of recommendations

285. HS2-P6-Rec59: That submission points relating to entrances are accepted/rejected as detailed in Appendix B.
286. HS2-P6-Rec60: That G37 and G39 be confirmed as notified.
287. HS2-P6-Rec61: That G40 be amended as follows:

G40 • Where possible, provide canopies and verandahs at active edges of ~~the apartment~~ buildings and multi-unit developments and above entrances.

5.12 Facades (G41)

Matters raised by submitters

288. Wellington Branch NZIA [301.20 (opposed by The Retirement Villages Association of New Zealand Incorporated FS126.231 and Ryman Healthcare Limited FS128.231) and Guy Marriage [407.43] considers that the Facades section of the Residential Design Guide (G41) is too short and inadequate and should be amended to be more thorough. An amendment is sought to include provisions on proportion, materials, texture and colour.
289. Wellington Branch NZIA [301.21 (opposed by The Retirement Villages Association of New Zealand Incorporated FS126.232 and Ryman Healthcare Limited FS128.232)] and Guy Marriage [407.42] consider that the Facades section of the Residential Design Guide (G41) should require multi-storey buildings to be designed by Registered Architects.

Assessment

290. Regarding Wellington Branch NZIA's submission point [301.20] and Guy Marriage's submission point [407.43], I consider that G41 allows for flexibility in design and response to context. The purpose of the guideline is to encourage good streetscape design in the city and to achieve good CPTED outcomes.
291. Regarding the Retirement Villages Association of New Zealand Incorporated's further submission points [FS126.231 and FS126.232] and Ryman Healthcare Limited's further submission points [FS128.231 and FS128.232], I note that the Design Guides are designed to be general enough to provide sufficient flexibility to apply to any form of development, in this case residential development under the Residential Design Guide. The Design Guides are not specific to an individual activity nor have specialised design guidelines.
292. In response to Wellington Branch NZIA's submission point [301.21] and Guy Marriage's submission point [407.42], the Residential Design Guide should require multi-storey buildings to be designed by Registered Architects. I disagree and consider that the Design Guides seek good design outcomes for the city and it is the industry or Central Government who should regulate who can do this, not the Wellington City Council.

Summary of recommendations

293. HS2-P6-Rec62: That submission points relating to facades are accepted/rejected as detailed in Appendix B.
294. HS2-P6-Rec63: That G41 be confirmed as notified.

5.13 Fencing (G43 – G44)

Matters raised by submitters

295. McIndoe Urban Limited [135.82] seek that G44 (Fencing) of the Residential Design Guide is amended to allow for a portion of a front fence to be high.
296. McIndoe Urban Limited [135.83] also seek to clarify the use of the word 'low' in G44 (Fencing).

Assessment

297. Regarding the McIndoe Urban Limited's submission points [135.82 and 135.83], the PDP rules regulate the height and the permeability of fences. Whereas the guidelines are created to achieve good design outcomes.

Summary of recommendations

298. HS2-P6-Rec64: That submission points relating to fences are accepted/rejected as detailed in Appendix B.

299. HS2-P6-Rec65: That G44 be confirmed as notified.

5.14 Connections for people (G45 – G49)

Matters raised by submitters

300. McIndoe Urban Limited [135.84] seek that G49 (Connections for people) of the Residential Design Guide is amended to acknowledge the subtleties of width being suitable for location and function.

Assessment

301. In response to McIndoe Urban Limited's submission point [135.84], a two dot rating under the Design Guides means that the guideline is applicable to some developments and not others. I consider that every resource consent is assessed on a site by site basis, and that there is enough flexibility in the Residential Design Guide to be site specific.

Summary of recommendations

302. HS2-P6-Rec66: That submission points relating to connections for people are accepted/rejected as detailed in Appendix B.

303. HS2-P6-Rec67: That G49 be confirmed as notified.

5.15 Garages, carports and carpads (G50 – G53)

Matters raised by submitters

304. McIndoe Urban Limited [135.85] seek 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.

305. Disabled Persons Assembly New Zealand Incorporated [343.24] considers that replacing "limited mobility users" with "people with mobility impairments, i.e., wheelchair users, mobility aid users, etc" is more appropriate as the intention is to refer to this grouping of the disability community. [343.24] seeks to amend G53 (Garages, carports and carpads) as follows:

G53 •• Developments designed for ~~limited mobility users~~ people with mobility impairments, i.e., wheelchair users, mobility aid users, etc, should provide an accessible link between parking spaces and their associated unit.

306. Nick Ruane [61.16] opposes G53 of the Residential Design Guide in its current form and seeks amendment. This point is opposed by The Retirement Villages Association [FS126.196] and Ryman Healthcare [FS128.196].
307. Nick Ruane [61.17] and the Disabled Persons Assembly New Zealand Incorporated [343.17] seek that G53 is amended as follows:

G53 •• “Developments designed for limited mobility users ~~should~~ must provide an accessible link between parking spaces and their associated unit.”

This point is opposed by The Retirement Villages Association [FS126.197] and Ryman Healthcare [FS128.197].

308. McIndoe Urban Limited [135.86] seeks clarification of G54.

Assessment

309. In response to McIndoe Urban Limited’s submission point [135.85], I do not consider that changes to G50 is necessary and I consider this amendment is overly onerous.
310. Regarding the Disabled Persons Assembly New Zealand Incorporated’s submission point [343.24] regarding G53 and its associated amendments, I acknowledge the suggested change from ‘limited mobility users’ to ‘people with mobility impairments’ and take the Disabled Persons Assembly New Zealand Incorporated’s advice on terminology as a representative for the disabled community.
311. I also agree that it is useful to list examples of people that might have mobility impairment including wheelchair users and mobility aid users. Including this in the design guideline helps to raise awareness of mobility impairments and different kinds and how developers and designers can enable greater accessibility in development through designing buildings to be inclusive for everyone, including those with mobility impairments.
312. In response to Nick Ruane’s submission points [61.16 and 61.17] and the Disabled Persons Assembly New Zealand Incorporated’s submission point [343.17], the Retirement Villages Association’s further submission points [FS126.196 and FS126.197] and Ryman Healthcare’s further submission points [FS128.196 and FS128.197], I consider that ‘must’ is too direct and does not provide sufficient flexibility for site by site consideration as part of urban design assessments. My comments about the District Plan not being able to be more stringent than the Building Code also apply here. The notified drafting provides this flexibility, and reflects the rating system approach in the Design Guides and the rating given to this specific guideline.
313. Regarding McIndoe Urban Limited’s submission point [135.86], I consider that the guideline has sufficient clarity through the orange text provided.

Summary of recommendations

314. HS2-P6-Rec68: That submission points relating to garages, carports and carpads are accepted/rejected as detailed in Appendix B.
315. HS2-P6-Rec69: That G50 and G54 be confirmed as notified.
316. HS2-P6-Rec70: That G53 is amended as follows:

G53 •• Developments designed for ~~limited mobility users~~ people with mobility impairments, i.e., wheelchair users, mobility aid users, etc., should provide an accessible link between parking spaces and their associated unit.

5.16 Grouped carparking at grade (G55 – G60)

Matters raised by submitters

317. McIndoe Urban Limited [135.87] seeks that G55 (Grouped parking and shared access at grade) is amended to allow for a shared surface approach in some circumstances.
318. McIndoe Urban Limited [135.88] also seeks to remove the italicised text under G55 (Grouped parking and shared access at grade) as follows:

G55 ••• Ensure that parking or vehicle manoeuvring areas provide pedestrian access that differentiates safe walking paths.

~~*Planting is also important in ensuring visual amenity, stormwater treatment, shade and screening of grouped carpark spaces.*~~

319. McIndoe Urban Limited [135.89] seeks to amend G58 (Grouped parking and shared access at grade) to allow for parking in some instances.
320. McIndoe Urban Limited [135.90] seeks that G55 and G59 (Grouped parking and shared access at grade) are combined, with amendment to allow for a shared surface approach in some circumstances.
321. McIndoe Urban Limited [135.91 and 135.92] seeks that G60 (Grouped parking and shared access at grade) is edited or deleted.
322. Stratum Management Limited [249.48 and 249.49] seeks that guideline 58 (Grouped car-parking or shared access at grade) is removed or appropriately qualified.
323. VicLabour [414.59] seeks to retain G56 of the Residential Design Guide.

324. Catherine Underwood [481.38] seeks clarification on the intent of G60 of the Residential Design Guide.
325. Catherine Underwood [481.39] does not specify a decision sought. However, the submitter considers that sub-points in the Residential Design Guide regarding cars and carparking tend to have 'must' in their wording, while sub-points on storage for ebikes, bikes, scooters and other modes of transport have 'should' in their wording, such as G74 under the heading Carbon Reduction.

Assessment

326. Regarding McIndoe Urban Limited's submission points [135.87, 135.88 and 135.90] on G55, I consider more clarity could be provided for G55. I agree that G55 and G59 could be combined and I consider that G55 allows for a shared surface. I also agree that G55 and G59 address the same matter, so rationalisation is appropriate. However, the shared surface needs to be differentiated, which can be through surface treatment. I am in agreement with [135.88] in that the orange supporting italicised text needs to be removed from G55, and moved to G58.
327. In response to McIndoe Urban Limited's submission point [135.89] and Stratum Management Limited's submission points [249.48 and 249.49] on G58:
- I do not consider that new carparking at street edge is a good design or safety outcome. It is a guideline and not a standard or a 'must' because it still allows some flexibility for Council and developers in discussions as part of the resource consent processes as necessary, thus not precluding parking on street edges on limited development specific occasions where it may be allowed if no other outcomes can be achieved.
 - G58 has been included as design guide because this regularly arises as an issue in Section 92 requests and responses, and is included as a highly rated design guideline so that Council staff can bring this up in pre-application meetings with developers and designers.
 - G58 supports the intent of rules in the Residential Zones and Centres and Mixed Use Zones to locate parking away from the street frontage where possible for safety and design reasons.
328. In response to McIndoe Urban Limited's submission points [135.91 and 135.92], I consider that it is necessary to have guidance on carparking being grouped to improve frontage relationships etc. in order to encourage good outcomes at the street frontage. However, I consider that G60 needs to be amended to also note that carparking is to be grouped to rear or middle of the site, not the front or side of the sites to provide greater clarity for readers.
329. I acknowledge VicLabour's submission point [414.59] which seeks to retain G56 of the Residential Design Guide.

330. Regarding Catherine Underwood’s submission point [481.38], G60 is to be read alongside G58 which notes that carparking must not be located on the street front. G60 is referring to grouping carparking, but away from the street frontage, i.e. further back in the site, in the middle or rear. I consider G60 needs to be amended to also note that carparking is to be grouped to rear or middle of the site, not the front or side of the sites to provide greater clarity for readers.
331. In response to Catherine Underwood’s submission point [481.39]:
- a. I note that the carparking guidelines tend to have a three dot rating compared to the two dot rating of the guidelines relating to ebikes, scooter and other modes of transport. Hence, the language is different because Council considers that the three dot guidelines are somewhat more significant and it is important that these be implemented, without diminishing the importance of the two dot rated guidelines.
 - b. The guidelines are not encouraging providing carparking, which aligns with the NPS-UD direction that District Plans cannot have minimum carparking requirements. However, it is ensuring safe and aesthetically pleasing design outcomes where developers are providing carparks.

Summary of recommendations

332. HS2-P6-Rec71: That submission points relating to grouped carparking at grade are accepted/rejected as detailed in Appendix B.
333. HS2-P6-Rec72: That G55, G58, G59 and G60, and the Residential Design Guide numbering, are amended as follows:

G55 ••• Ensure that parking or vehicle manoeuvring areas provide legibility, safety and pedestrian access by that differentiates differentiating safe walking paths- and 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.

Planting is also important in ensuring visual amenity, stormwater treatment, shade and screening of grouped carpark spaces.

G58. ••• Car parking must not be located at the street front. Locate car parking, loading areas, and servicing to be convenient while not compromising the quality of the street edge or entrances to dwellings.

Planting is also important in ensuring visual amenity, stormwater treatment, shade and screening of grouped carpark spaces.

~~**G59.** ••• 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.~~

G60. •• Carparking should be grouped at the middle or rear of the site, away from the street frontage, to improve frontage relationships, setbacks, streetscape, private open space, laneway, landscaping, etc.

334. HS2-P6-Rec73: That G56 be confirmed as notified.

5.17 Legibility (G62)

Matters raised by submitters

335. McIndoe Urban Limited [135.93] considers that the italicised statement above G62 relates to neighbourhood design yet the guideline relates to design within the site. The submitter seeks this statement is deleted.

336. McIndoe Urban Limited [135.94] also seeks that G62 (Legibility) is relocated to the section titled 'Connections for People'.

Assessment

337. Regarding McIndoe Urban Limited's submission point [135.93], I agree that the italicised statement above G62 should be deleted as the italicised text is talking about a different scale to the guideline itself. The italicised wording is talking about a neighbourhood scale, whereas G62 is focusing on a development specific level.

338. In response to McIndoe Urban Limited's submission point [135.94], I agree that G62 should be removed from the 'Legibility' section, and thus the heading deleted, and that G62 be

moved to sit under the 'Connections for People' heading. Consequent renumbering of the Residential Design Guide guidelines will be required given G62 is being moved.

Summary of recommendations

339. HS2-P6-Rec74: That submission points relating to legibility are accepted/rejected as detailed in Appendix B.
340. HS2-P6-Rec75: That the 'Legibility' heading and G62 is amended as follows with respect to:

<p>Legibility</p> <p>Safety, accessibility and legibility contribute to vibrant connected neighbourhoods.</p> <p>G62. • • • Provide shared internal circulation within developments that are efficient, convenient and understandable</p> <p>Connections for people</p> <p>...</p> <p><u>GXX • • • Provide shared internal circulation within developments that are efficient, convenient and understandable</u></p>
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5.18 Lighting (G63 – G72)

Matters raised by submitters

341. McIndoe Urban Limited [135.95] considers that lighting is a matter of detail that is generally covered later and can be referred to in conditions on a resource consent, no specific decision is requested.
342. Guy Marriage [407.29, 407.30, 407.31, 407.32, 407.33, 407.34, 407.35, 407.36, 407.37, and 407.38] has concerns that G63, G64, G65, G66, G67, G68, G69, G70, G71, and G72 (Lighting) only apply to artificial light and seeks that G63, G64, G65, G66, G67, G68, G69, G70, G71, and G72 (Lighting) of the Residential Design Guide are amended to apply to natural levels of daylight and sunlight.
343. Guy Marriage [407.39 and 407.40] seeks to amend the Residential Design Guide to put the "Lighting" provisions (G62 - G72) next to the "Light and sunlight" provisions (G118 to G120) and next to the "Artificial Light" provisions (G121 to G122).
344. Wellington Branch NZIA [301.24] seek that the 'Lighting' section heading in the Residential Design Guide be renamed to 'Artificial Lighting' as follows:

<p><u>Artificial Lighting</u></p>
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345. The Retirement Villages Association of New Zealand Incorporated [FS126.235] and Ryman Healthcare Limited [FS128.235] oppose Wellington Branch NZIA's submission point [301.24].
346. Wellington Branch NZIA [301.25] seek that the Residential Design Guide be amended to put the 'Lighting' section near the 'Light and Sun' and 'Natural Light' sections (this point is opposed by The Retirement Villages Association of New Zealand Incorporated [FS126.236] and Ryman Healthcare Limited [FS128.236]).
347. Glenside Progressive Association Inc [374.13] seek to amend the Residential Design Guide to more strictly regulate light pollution.

Assessment

348. In response to McIndoe Urban Limited's submission point [135.95], I consider that lighting is integral to good development outcomes, and thus seek to keep lighting for large scale residential development. As part of the resource consent process Council adds such conditions based on applicable design guide guidelines. I seek to retain these guidelines for Council's use and discussions as part of the resource consent pre-application process.
349. Regarding Guy Marriage's submission points [407.29, 407.30, 407.31, 407.32, 407.33, 407.34, 407.35, 407.36, 407.37, and 407.38], as guidelines G64-72 are about night-time and CPTED outcomes, and not daylight and sunlight which the submitter is referring to, thus making the discussion about daylight and sunlight moot. This is reinforced in the guidelines themselves being about:
- a. G63 - Artificial lighting for wayfinding at night;
 - b. G64 - Ensuring apartment building entrances and pathways are well lit at night;
 - c. G65 - Artificial lighting at night for safety and security on pedestrian pathways;
 - d. G66 - Artificial lighting being used to illuminate potential night-time concealment;
 - e. G67 - Artificial lighting being used to avoid creating areas of shadow/darkness at night-time;
 - f. G68 - Artificial lighting not being used for spaces not intended for night time use;
 - g. G69 - Artificial lighting being directed away from windows at night time;
 - h. G70 - Artificial lighting fittings being integrated into the architecture of buildings and the design of open spaces for night time use;
 - i. G71 - The design of artificial lighting; and
 - j. G72 – Designing artificial lighting within facilities so that the surrounding public space is well lit at night.
350. Regarding Guy Marriage's submission points [407.39 and 407.40]:
- I note that the artificial lighting section was placed in the wider 'well-functioning sites' section on purpose. The purpose being that artificial lighting is usually about how pedestrians move through the site after the sun has set and lighting plans are usually submitted with landscape plans to Council as part of a development application. Hence, the connection to 'well-functioning sites'.

- I also note that other sub-sections in the ‘well-functioning sites’ section include ‘undercroft parking and podiums’ and ‘carparking’, so there is a connection also in terms of a safety theme.
- I do not see a significant benefit to moving these guidelines into another section of the Residential Design Guide.

351. In response to Wellington Branch NZIA’s submission point [301.24], The Retirement Villages Association of New Zealand Incorporated’s further submission point [FS126.235] and Ryman Healthcare Limited’s further submission point [FS128.235], I agree to change the heading of the section from ‘Lighting’ to ‘Artificial Lighting’.

352. Regarding Wellington Branch NZIA’s submission point [301.25], The Retirement Villages Association of New Zealand Incorporated’s further submission point [FS126.236] and Ryman Healthcare Limited’s further submission point [FS128.236], I note that this section is generally about outdoor lighting and/or the effect of indoor lighting on public outdoor spaces. It is usually a part of landscape design and site layout, and the intent is good CPTED outcomes. I consider that this section is fine to remain where it currently is in the notified PDP Residential Design Guide.

353. In response to Glenside Progressive Association Inc’s submission point [374.13], I consider that this matter is dealt with through the Light Chapter in the PDP, rather than through the Residential Design Guide.

Summary of recommendations

354. HS2-P6-Rec76: That submission points relating to lighting are accepted/rejected as detailed in Appendix B.

355. HS2-P6-Rec77: That G63-G72 and the location of the ‘Lighting’ section be confirmed as notified.

356. HS2-P6-Rec78: That the ‘Lighting’ section be retained in its current place in the Residential Design Guide as notified.

357. HS2-P6-Rec79: That the heading of the ‘Lighting’ section be amended as follows:

Artificial Lighting

5.19 Carbon reduction – site (G73 – G74)

Matters raised by submitters

358. Stratum Management Limited [249.50] seeks that guideline 73 (Carbon reduction - site) of the Residential Design Guide is appropriately qualified, for instance by amending the first sentence to "Encourage the provision of...".
359. Stratum Management Limited [249.51] seeks that guideline 74 (Carbon reduction - site) of the Residential Design Guide is appropriately qualified.

Assessment

360. Regarding Stratum Management Limited's submission point [249.50], the majority of guidelines that also have two dots under the guideline rating system refer to 'should'. I consider that encourage is less directive and would be better suited for a one dot rated guideline. G73 is not designed to be read as a standard nor to be implemented as one (none of the design guide guidelines are). Instead it is indicating that the provision of end of trip cycle facilities as a good method of assisting in reducing carbon outputs.
361. Regarding Stratum Management Limited's submission point [249.51], I consider that G74 is not designed to be read as a standard nor to be implemented as one (none of the design guide guidelines are). Instead, it is indicating that the provision of end of trip cycle facilities as a good method of assisting in reducing carbon outputs.

Summary of recommendations

362. HS2-P6-Rec80: That submission points relating to carbon reduction - site are accepted/rejected as detailed in Appendix B.
363. HS2-P6-Rec81: That G73 and G74 be confirmed as notified.

5.20 Communal open space (G75 – G79)

Matters raised by submitters

364. McIndoe Urban Limited [135.96] seeks that G75 to G79 (Communal open space) are combined into one guideline.
365. McIndoe Urban Limited [135.97] also seeks clarification of the use of 'sunlight access' within G75 to G79.
366. Wellington Branch NZIA [301.23 (opposed by The Retirement Villages Association of New Zealand Incorporated FS126.234 and Ryman Healthcare Limited FS128.234)] seeks that G75 to G79 be classified as being of three-dot importance.

367. Guy Marriage [407.24, 407.25, 407.26, 407.27 and 407.28] seeks that G75, G77, G78 and G79 should be amended to be given a three dot importance and G76 should be amended to be given more importance.
368. Disabled Persons Assembly New Zealand Incorporated [343.25] seeks to make the following amendment to point 7 of G76 of the Residential Design Guide:

G76. • • Communal open space should:

- » Offer a sense of manaakitanga (are safe and inviting).
- » Be the focus of the development.
- » Be of an appropriate proportion and defined by the built form.
- » Have a direct or easy connection to all dwellings.
- » Be located and oriented to receive sun and shelter at times of highest use.
- » Be flat, but may incorporate changes in level where these are designed to add to the visual and functional amenity of the space. Changes in level should be properly ramped.
- » Include landscape elements that are of an appropriate scale e.g trees, seating and fences.

369. Disabled Persons Assembly New Zealand Incorporated [343.26] also considers that inserting the term 'accessible' will ensure spaces can be accessible for all people, including disabled people and that reference should be made to kitchenettes in clause 78 of the Residential Design Guide as per the following amendment:

G78. • • Where possible, provide accessible communal spaces for social interaction and outdoor activities, including kitchenettes. Especially in more significant developments or where private outdoor living spaces are insufficient for people to meet their everyday needs.

Assessment

370. Regarding McIndoe Urban Limited's submission point [135.96]:
- I consider that each guideline relates to a separate matter and as such should remain separated into their own guideline for emphasis. G75 relates to passive surveillance, G76 key functions of communal open space, G77 the inclusion of play features for children in large scale developments, G78 encouraging social interaction, and G79 dimensional proportions.
 - G75 has a dot rating of three, higher than that of G75-79, which I consider reinforces the need for it to remain as its own guideline separate to the other guidance.
 - G77 and G78 refer to talk to different scale developments than the other guidelines, which are more generalised. G77 refers to large scale developments, whereas G78 refers to more significant development or where private outdoor living spaces are insufficient.

- G75-79 support the outdoor living space standards in the PDP which apply to the Medium Density and High Density Residential Zones and the Centres and Mixed Use Zones. Given the widespread application of this standard, it is important that there is sufficient, detailed design guideline to support this standard and the creation of communal living spaces.
371. Regarding McIndoe Urban Limited's submission point [135.97] that more guidance is required on what an 'appropriate level and extent of sun' should be for shared spaces, an 'appropriate level and extent of sun' was not specified in order to keep guidelines G75-79 general and flexible enough for Council to seek good sunlight access outcomes for communal living spaces with developers at a site-specific levels.
372. In response to Wellington Branch NZIA's submission point [301.23], The Retirement Villages Association of New Zealand Incorporated's further submission point [FS126.234] and Ryman Healthcare Limited's further submission [FS128.234], I note that G75-79 Communal open space and G80 to G84 Private Open Space both apply to multi-unit housing and apply the same dot rating for multi-unit housing. Additionally, all developments will have private open spaces for each dwelling but not all developments will have communal spaces, hence the rating difference.
373. In response to Guy Marriage's submission point [407.24], I note that G75 already has a three dot rating under the notified Residential Design Guide.
374. Regarding Guy Marriage's submission points [407.25, 407.26], I consider that the two dot rating for guidelines G76-G77 is sufficient to signal the importance of the design guideline direction whilst also providing sufficient flexibility in design of communal open space. I note that not all guidelines could be afforded the three dot rating otherwise this would defeat the point of the rating system. I also note that not all development applications will have a communal space, instead providing private outdoor space, which also a reason for why these guidelines have been assigned two dots.
375. Regarding Guy Marriage's submission point [407.27 and 407.28] relating to G78 and G79, I consider that the wording for G78 and G79 could be stronger to reflect their two dot rating status. However, I note that the two dot rating is sufficient to signal the importance of the design guideline direction whilst also providing sufficient flexibility in design of communal open space.
376. I acknowledge the Disabled Persons Assembly New Zealand Incorporated's submission point [343.25].
377. Regarding the Disabled Persons Assembly New Zealand Incorporated's submission point [343.26], I consider that this change ensures emphasis is put on accessible communal spaces and further enables social interactions. I take the Disabled Persons Assembly New Zealand Incorporated's advice on terminology as a representative for the disabled community. However, I disagree with the suggested addition of 'including kitchenettes' because G78

relates to outdoor communal spaces, not the indoor communal spaces which is addressed in a different guideline, thus I consider the requirement to include a kitchenette is not appropriate or to be expected of outdoor communal spaces.

Summary of recommendations

378. HS2-P6-Rec82: That submission points relating to communal open space are accepted/rejected as detailed in Appendix B.

379. HS2-P6-Rec83: That G75 and G77 be confirmed as notified.

380. HS2-P6-Rec84: That G76 of the Residential Design Guide be amended as follows:

G76. • • Communal open space should:

- » Offer a sense of manaakitanga (are safe and inviting).
- » Be the focus of the development.
- » Be of an appropriate proportion and defined by the built form.
- » Have a direct or easy connection to all dwellings.
- » Be located and oriented to receive sun and shelter at times of highest use.
- » Be flat, but may incorporate changes in level where these are designed to add to the visual and functional amenity of the space. Changes in level should be properly ramped.
- » Include landscape elements that are of an appropriate scale e.g trees, seating and fences.

381. HS2-P6-Rec85: That G78 be amended as follows:

G78. • • ~~Where possible, provide C~~ommunal spaces should be accessible and provide 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.

382. HS2-P6-Rec86: That G79 be amended as follows:

G79. • • ~~Consider t~~The dimensional proportions of communal open space should be designed to create a feeling of intimacy and enclosure balanced with openness, flexibility of use and maximum sunlight access.

5.21 Private open space (G80 – G86)

Matters raised by submitters

383. McIndoe Urban Limited [135.98] seeks that G84 (Private open space) of the Residential Design Guide is amended to include some provision for private occupation of parts of the frontage, with low fencing along the balance.
384. McIndoe Urban Limited [135.99] seeks clarity of the use of 'sunlight access' within G84.
385. Stratum Management Limited [249.52] seeks that guideline G82 is appropriately qualified.
386. Disabled Persons Assembly New Zealand Incorporated [343.27] considers that inserting the term 'accessible' before "open space" in G84 would indicate that sometimes balconies are inaccessible to disabled people, particularly wheelchair or mobility aid users due to the fact that too often balconies are too small to accommodate wheelchairs or mobility aids and lips can be difficult to negotiate. The submitters amendments are as follows:

G81. • • • Assign private accessible open space to individual units of a type and quality appropriate to the dwelling typology, wherever possible.

387. Disabled Persons Assembly New Zealand Incorporated [343.28] seeks that G86 is retained as notified.
388. Guy Marriage [407.19-407.23] seeks that G80-G84 (Private Open Space) applies to multi-unit housing.
389. Jacqui Tutt [209.1] seeks an addition to the Residential Design Guide to include the following:

Sun access to outdoor spaces between spring and autumn equinox (4hrs) as well as sun access to internal living spaces in winter (2hrs).

Assessment

390. Regarding McIndoe Urban Limited's submission points [135.98 and 135.99] on G84:
- With regards to the submitter's amendment regarding some provision for private occupation of parts of the frontage, I consider that a sense of privacy can be achieved through landscaping, e.g. planting, without the use of high fences. High fences disrupt visual connection to the street resulting in poor street frontages and a lack of passive surveillance.
 - With regards to 'sunlight access' clarity sought by the submitter, I note that there is no standard for 'appropriate level and extent of sun access' in order to keep the design guidelines general and provide enough flexibility for a case-by-case assessment. I consider that this change in approach provides negotiation at the pre-application stage for Council.

391. In response to Stratum Management Limited's submission point [249.52] that a qualifier needs to be added for circumstances where the 'principal area' of the private open space, or any balcony or deck' cannot be located to the north, west or east, and has to be south facing, I note that the "where possible" language is used for one dot-rated guidelines which are nice-to-haves. Whereas this guideline has the strongest three-dot rating under the Design Guides guideline rating system. This three-dot rating is intentional and sets the expectation that private open spaces will achieve these outcomes. However, there is of course flexibility on a case-by-case basis where this cannot be achieved and this is discussed through the resource consent application process.
392. In response to the Disabled Persons Assembly New Zealand Incorporated's submission point [343.27] to ensure that private open spaces are accessible, I agree that this change ensures emphasis is put on accessible private open spaces.
393. Regarding Guy Marriage's submission points [407.19-407.23], I note that guidelines G80-G4 already do apply to multi-unit housing.
394. In response to Jacqui Tutt's submission point [209.1], my comments in response to McIndoe Urban Limited [135.98 and 135.99] on G84 apply.

Summary of recommendations

395. HS2-P6-Rec87: That submission points relating to private open space are accepted/rejected as detailed in Appendix B.
396. HS2-P6-Rec88: That G80, G82-G84 and G86 be confirmed as notified.
397. HS2-P6-Rec89: That G81 is amended as follows:

G81. • • • Assign private [accessible](#) open space to individual units of a type and quality appropriate to the dwelling typology, wherever possible.

5.22 Balconies and sunrooms (G87 – G89)

Matters raised by submitters

398. Guy Marriage [407.18] and Wellington Branch NZIA [301.22] seek to amend G87 (Balconies and sunrooms) to mandate a balcony or deck to every living space in the City Centre Zones. The Retirement Villages Association [FS126.233] and Ryman Healthcare [FS128.233] seek that 301.22 be disallowed.
399. McIndoe Urban Limited [135.100] seeks that G89 (Balconies and sunrooms) is amended to refer to 'occupiable space'.

G89. •• Heat pumps and clothes lines that are designed into the balcony space should not impact the ~~usable~~ occupiable space or obstruct passive surveillance

Assessment

400. In response to Guy Marriage [407.18], Wellington Branch NZIA's submission point [301.22], the Retirement Villages Association's submission point [FS126.233] and Ryman Healthcare's submission point [FS128.233]:
- I note that the City Centre Zone has a residential - outdoor living space requirement standard (CCZ-S10) in the PDP, which does not exist in the ODP and was addressed to ensure residential units have access to either private outdoor living space i.e. a deck or balcony or a communal space to ensure residents could get benefits from outdoor space include social, cultural and mental wellbeing benefits. This also aligns with the Green Network Plan for the CCZ. This standard mandates this requirement for private or communal spaces.
 - The Design Guide guidelines were developed to be guidelines only and not standards. Guidelines are intended to guide development outcomes and density done well. G4 supports CCZ-S10 but provides sufficient flexibility too for case-by-case design assessments.
 - I also consider that it is not practically possible to provide a balcony or deck for every living space in the City Centre Zone, as certain locations would be very exposed to climatic conditions and outdoor space would not be a pleasant space to use. I consider that provision of sunrooms or communal spaces as an alternative can provide more and better benefits to residents.
401. Regarding McIndoe Urban Limited's submission point [135.100] that G89 should refer to 'occupiable' space as opposed to 'usable' space, I agree that clothes lines are a legitimate use that is required by this guide. The intent of this design guideline was to speak to occupiable areas as well as enable a line of sight for passive surveillance. I consider that further clarity in the guideline can be provided to further explain this.

Summary of recommendations

402. HS2-P6-Rec90: That submission points relating to balconies and sunrooms are accepted/rejected as detailed in Appendix B.
403. HS2-P6-Rec91: That G87 be confirmed as notified.
404. HS2-P6-Rec92: That G89 is amended as follows:

G89. •• Heat pumps and clothes lines that are designed into the balcony space should not impact the ~~usable~~ occupiable space or obstruct passive surveillance. For example, while a clothesline is in use, a table and chair on the balcony can also be used by the occupants of the dwelling.

5.23 Waste storage and waste collection (G90 – G94)

Matters raised by submitters

405. Stratum Management Limited [249.53 and 249.54] seeks that guideline 93 (Waste collection) of the Residential Design Guide is removed.
406. Disabled Persons Assembly New Zealand Incorporated [343.29] supports G91 on the basis that the concept of accessibility as it applies to the needs of disabled householders is understood.
407. McIndoe Urban Limited [135.101] seeks that G90-G92 (Waste collection) and G93 -G94 (Waste storage) of the Residential Design Guide are compressed into less guidelines.

Assessment

408. In response to Stratum Management Limited's submission points [249.53 and 249.54], I consider that this guideline is required so that Council urban design advisors have scope to work with developers to make amendments to the design of waste storage areas for accessibility, aesthetic and other reasons and make fixes to designs as necessary. I note that this guideline has been added because it is an identified issue that has been presenting as part of recent consent applications. Hence, this is addressing a known issue.
409. Regarding McIndoe Urban Limited's submission point [135.101], the guidelines have been set to ensure Council's urban design advisors can fix any design concerns regarding waste storage through having the ability to raise concerns with designs and have discussions with developers. I note that this is presenting as known issue in recent resource consent applications and this guideline provides a fix for this.

Summary of recommendations

410. HS2-P6-Rec93: That submission points relating to waste storage and waste collection are accepted/rejected as detailed in Appendix B.
411. HS2-P6-Rec94: That G90-94 be confirmed as notified.

5.24 Service elements (G95 – G98)

Matters raised by submitters

412. Disabled Persons Assembly New Zealand Incorporated [343.30] considers that guidance on large scale plant fixtures in clauses G96 - G98 need to ensure they are placed at accessible heights or in such a way that they can be easily adjusted by the householder concerned, and this includes by disabled people. The submitter seeks that the following amendments are made to G96 – G98:

G96. •• Any and all large plant fixtures should be placed at accessible heights where they can be easily adjusted by the householder concerned, including by any disabled person. Suitable space for natural or open-air laundry drying should be provided, within or accessible from each dwelling, but not within the defined 'principal area' or within shared open spaces that might be used for gathering

G97. •• Any and all large plant fixtures should be placed at accessible heights where they can be easily adjusted by the householder concerned, including by any disabled person. Smaller-scale external service elements such as air conditioning units, water heating units, gas bottles and water tanks, should not be visible from the public realm, dominate entrances or be located in the principal area of private open space or within shared open gathering spaces.

G98. • Any and all large plant fixtures should be placed at accessible heights where they can be easily adjusted by the householder concerned, including by any disabled person. Where possible, integrate any necessary security features into buildings or public spaces by designing them intrinsic, unobtrusive, or positive decorative features.

Assessment

413. In response to Disabled Persons Assembly New Zealand Incorporated's submission point [343.30], I consider that a separate guideline in the Residential Design Guide would be useful to state that appliances/fixtures for dwellings should be at an accessible height and locations would be beneficial.
414. I disagree that changes are needed to G96-G99 as I note that these guidelines speak to large plant fixtures, instead of appliances/fixtures in dwellings, which are for big multi-unit developments such as apartments and would not be accessed by the residents, only by professionals such as electricians and independent qualified person (IQP).

Summary of recommendations

415. HS2-P6-Rec95: That submission points relating to service elements are accepted/rejected as detailed in Appendix B.
416. HS2-P6-Rec96: That G96-99 be confirmed as notified.
417. HS2-P6-Rec97: That a new guideline is added to the 'Service Elements' section of the Residential Design Guide, and consequent renumbering of the Residential Design Guide guidelines is made given a new design guideline is being added, as follows:

G96. •• Suitable space for natural or open-air laundry drying should be provided, within or accessible from each dwelling, but not within the defined 'principal area' or within shared open spaces that might be used for gathering

G97. •• Smaller-scale external service elements such as air conditioning units, water heating units, gas bottles and water tanks, should not be visible from the public realm, dominate entrances or be located in the principal area of private open space or within shared open gathering spaces.

G98. • Where possible, integrate any necessary security features into buildings or public spaces by designing them intrinsic, unobtrusive, or positive decorative features.

GXX. •• Appliances and fixtures for dwellings should be placed at accessible heights and locations where they can be easily adjusted by the occupants, including by any disabled person.

5.25 External storage (G99 – G105)

Matters raised by submitters

418. McIndoe Urban Limited [135.102] seeks that G99, G101, G102 and G103 (External Storage) are combined into a single guideline.
419. McIndoe Urban Limited [135.103] seeks that G104 and G105 (External storage) are combined into a single guideline.
420. McIndoe Urban Limited [135.104] seeks to clarify G100 (External storage).
421. McIndoe Urban Limited [135.105] seeks that the text of G105 (External storage) is edited for more precision.
422. Jill Ford [163.16-163.18] seeks that G99, G100 and G101 is retained as notified.
423. Jill Ford [163.19] seeks that G102 is retained.
424. Patrick Wilkes [173.24] seeks that G99-102 is retained with amendment to include in objectives, policies and rules.
425. Stratum Management Limited [249.55-249.56] seeks that G99-G105 are appropriately qualified to not present as standards and are removed where possible.
426. Bruce Crothers [319.19] seeks that G99 to G102 are retained as notified.
427. Joan Fitzgerald [323.5] seeks that G99-G102 is retained as notified.

Assessment

428. Regarding McIndoe Urban Limited's submission point [135.102], I note that these guidelines have separate design guide ratings. I consider that some guidelines will apply to all

developments, where others are recommendations. G99 is for large developments only, which would limit the other guidelines if we were to combine them.

429. In response to McIndoe Urban Limited's submission point [135.103], G104 and G105 have different design outcomes. Hence, it would be inappropriate to combine them.
430. In response to McIndoe Urban Limited's submission point [135.104], I note that further clarity could be provided whilst still providing required flexibility in the guideline. I consider that examples could be incorporated in this design guideline through orange text to explain that the storage should accommodate things such as a BBQ, lawn mower, bicycles etc. dependent upon the occupancy.
431. Regarding the submission point by McIndoe Urban Limited [135.105], I acknowledge that G105 may be challenging to achieve when storage and service areas are within basements and some service areas are on rooftops. I consider that G105 could be amended to clarify that in certain circumstances, i.e.. rooftops and basements, storage areas and service rooms may not be able to be visible to public, communal or private spaces for passive surveillance. I also consider that in response to this clarification amendment and wording change, G105's dot design guide rating should be amended from two dots to one dot, to reflect the change in language in this guideline.
432. Regarding Patrick Wilkes's submission point [173.24] in relation to retaining G102 as notified, I disagree that the guideline needs to reference specific PDP provisions, nor do I consider that the PDP provisions need to reference G102 specifically. Apart from the City Outcome Contribution guideline being referenced in City Outcome Contribution specific policies, the PDP does not reference specific guidelines instead referring to the Design Guides themselves.
433. Regarding Stratum Management Limited's submission points [249.55-249.56], I consider that these guidelines are not designed to be read as standards nor to be implemented as one (none of the design guide guidelines are). Instead it is indicating that Council sees the provision of bicycle storage in apartments as a good method of assisting in reducing carbon outputs.

Summary of recommendations

434. HS2-P6-Rec98: That submission points relating to external storage are accepted/rejected as detailed in Appendix B.
435. HS2-P6-Rec99: That G99 and G101-104 be confirmed as notified.
436. HS2-P6-Rec100: That G100 be amended as follows:

G100. ●●● External storage areas must be of an appropriate size and volume in relation to the occupancy of the allocated unit.

For example external storage areas could accommodate things such as a BBQ, lawn mower, bicycles etc., dependent on the occupancy of the allocated unit.

437. HS2-P6-Rec101: That G105 be amended as follows:

G105. • ~~▲~~ ~~Where possible, s~~Storage and service rooms should be visible from the public, communal, or private spaces for passive surveillance.

5.26 Architectural context and architectural coherence (G106 – G109)

Matters raised by submitters

438. McIndoe Urban Limited [135.106] consider that the second bullet point of G107 (Architectural context) is removed, depending on priorities as follows:

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.~~

439. Wellington Branch NZIA [301.18 (opposed by The Retirement Villages Association of New Zealand FS126.230 and Ryman Healthcare Limited FS128.230)] seeks clarity in G109 to provide more guidance on medium density housing and high density housing needs.
440. Disabled Persons Assembly New Zealand Incorporated [343.31] seeks that G106 is retained as notified.
441. Glenside Progressive Association Inc [374.12] seeks to amend the Residential Design Guide to more strictly regulate visually prominent form and colours, noting that the Residential Design Guide's section on Built Form should be strengthened to include form, colour and light pollution for housing that is visually prominent.

Assessment

442. In response to McIndoe Urban Limited's submission point [135.106] regarding G107, I agree that the second bullet point regarding roof materials and colours creates uncertainty when compared with the first point regarding visually recessive finishes and colours. I consider that second bulleted point relates to secondary design outcomes that are not necessary to achieve the intended outcome of the guideline. This second bullet point can be removed due to the uncertainty it is creating and because roof materials and colours are already addressed in the first bulleted point.
443. In response to Wellington Branch NZIA's submission point [301.18], The Retirement Villages Association of New Zealand's further submission point [FS126.230] and Ryman Healthcare Limited's further submission point [FS128.230] regarding G109, I consider that the guideline allows for a design response that expresses a unique identity for dwellings. To be prescriptive

would defeat the purpose of the guideline. I also note that some design guidance is provided in the orange text.

444. Regarding Glenside Progressive Association Inc's submission point [374.12], I consider that the Design Guides have drafted to provide sufficient flexibility for Council to undertake discussions with developers as part of the resource consent process to achieve a site-specific appropriate outcome.

Summary of recommendations

445. HS2-P6-Rec102: That submission points relating to architectural context and architectural coherence are accepted/rejected as detailed in Appendix B.
446. HS2-P6-Rec103: That G106 and G109 be confirmed as notified.
447. HS2-P6-Rec104: That G107 be amended as follows:

G107. • • New buildings in prominent locations, such as ridgelines or hilltops, should: use visually recessive finishes and colours.

» ~~Use visually recessive finishes and colours~~

» ~~Use roof materials and colours that are dark and absorb rather than reflect light.~~

5.27 Visual privacy (G110 – G113)

Matters raised by submitters

448. McIndoe Urban Limited [135.107] seeks that the wording of G110 is amended to provide for reasonable internal privacy.

Assessment

449. In response to the submission point from the McIndoe Urban Limited [135.107], guideline G110 has been drafted to enable Council the ability to undertake discussions with developers to move a window or make a window bigger or smaller in order to mitigate privacy breaches for proposed developments.

Summary of recommendations

450. HS2-P6-Rec105: That submission points relating to visual privacy are accepted/rejected as detailed in Appendix B.
451. HS2-P6-Rec106: That G110 be confirmed as notified.

5.28 Internal living spaces (G114 – G116)

Matters raised by submitters

452. Disabled Persons Assembly [343.18 and 343.32] considers that the use of 'where possible' in clause G116 of the Residential Design Guide is not appropriate and does not emphasise the need for greater compliance and uptake from designers, developers and builders. 343.18 seeks to amend G116 (Internal living spaces) as follows:

G116. • ~~Where possible~~, ensure ground level dwellings and all habitable rooms are designed for accessible and practical use.

» Consider having the kitchen, a bathroom and a bedroom on the ground level.

» Consider transition between rooms, and the ability to turn and manoeuvre mobility devices.

453. McIndoe Urban Limited [135.108] considers that while G115 provides one way of dealing with noise, it is not strictly necessary and it would be preferable to identify that this might also be addressed by construction.

454. Nick Ruane [61.10 and 61.11] opposes G116 of the Residential Design Guide in its current form and seeks amendment as follows:

G116. • ~~Where possible~~, ensure ground level dwellings and all habitable rooms are designed for accessible and practical use.

» Consider having the kitchen, a bathroom and a bedroom on the ground level.

» Consider transition between rooms, and the ability to turn and manoeuvre mobility devices.

455. The Retirement Villages Association [FS126.190 and FS126.191] and Ryman Healthcare [FS128.190 and FS128.191] oppose 61.10 and 61.11 and seek that these points be disallowed.

Assessment

456. Regarding the Disabled Persons Assembly's submission points [343.18 and 343.32], I consider that 'ensure' is too direct by itself without the 'where possible' and does not provide sufficient flexibility for site by site consideration as part of urban design assessments. The 'where possible' reflects that this is a two dot rated guideline. The notified guideline provides this flexibility, and reflects the rating system approach in the Design Guides and the rating given to this specific guideline.

457. In response to McIndoe Urban Limited's submission point [135.108], I note that G115 has a two dot rating and I consider that this provides sufficient flexibility for design of living space, and design generally, to mitigate noise impacts. I also consider that it is not necessary to add an amendment to refer to construction.

458. In response to Nick Ruane’s submission points [61.10 and 61.11], The Retirement Villages Association’s further submission point [FS126.190 and FS126.191] and Ryman Healthcare’s further submission point [FS128.190 and FS128.191], I consider that ‘ensure’ is too direct and does not provide sufficient flexibility for site by site consideration as part of urban design assessments. The notified guideline provides this flexibility, and reflects the rating system approach in the Design Guides and the rating given to this specific guideline.

Summary of recommendations

459. HS2-P6-Rec107: That submission points relating to internal living spaces are accepted/rejected as detailed in Appendix B.
460. HS2-P6-Rec108: That G115 and G116 be confirmed as notified.

5.29 Circulation (G117)

Matters raised by submitters

461. McIndoe Urban Limited [135.109] seeks to amend G117 and considers that G117 combines too many, not convincingly grouped matters. The guideline 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.
462. Disabled Persons Assembly New Zealand Incorporated [343.19] seeks to retain G117 (Circulation) as notified as this provision will ensure uptake and compliance from designers, builders and developers.
463. Nick Ruane [61.12] opposes G117 of the Residential Design Guide with decision requested not stated. The Retirement Villages Association [FS126.192] and Ryman Healthcare [FS128.192] oppose 61.12 and seek that 61.12 be disallowed.

Assessment

464. In response to McIndoe Urban Limited’s submission point [135.109], I consider that guideline G114 is about ensuring rooms are large enough to accommodate their function, i.e. living rooms spaces. In contrast, guideline G117 is about circulation and enabling sufficient accessibility to and within spaces. As such I disagree that these guidelines should be combined.
465. I acknowledge the submission point by Disabled Persons Assembly New Zealand Incorporated [343.19].
466. In response to Nick Ruane’s submission point [61.12], the Retirement Villages Association of New Zealand Incorporated’s further submission point [FS126.192] and the Ryman Healthcare Limited’s further submission [FS128.192], I consider that the decision requested was not stated and therefore there is no rationale which has been given for removing design guidance G117.

Summary of recommendations

467. HS2-P6-Rec109: That submission points relating to circulation are accepted/rejected as detailed in Appendix B.
468. HS2-P6-Rec110: That G117 be confirmed as notified.

5.30 Light and sun, natural light (G118 – G122)

Matters raised by submitters

469. McIndoe Urban Limited [135.110] considers that the title of G118 should be 'Sun Exposure' as the three guidelines refer to sun, and natural light is covered by G121 and G122 below this, as follows:

~~Light and Sun~~

Sun exposure

G118. • • • Locate and design the living areas and bedrooms of individual residential units to achieve direct natural lighting and optimise sun exposure and views.

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.

To ensure apartments are warm, energy-efficient, and support residents' well-being, sunlight is best maximised by orientating the building to offer units' living space an aspect to the north, west or east.

G120. • • Single-aspect, south-facing units should be avoided.

When not possible, consider units with lesser depth, larger glazing, higher quality communal spaces and better amenities for south-facing units.

470. McIndoe Urban Limited [135.111] considers the term 'direct natural lighting' at G118 should be clarified.
471. McIndoe Urban Limited [135.112] seeks that G118 is relocated under the heading 'Natural Light' below.
472. McIndoe Urban Limited [135.113] considers that the use of the words 'maximum possible' at G119 leads to uncertainty and ambiguity, and that the minimum amount of sun that should be provided should be defined, allowing for some flexibility.
473. McIndoe Urban Limited [135.114] seeks that if not link between borrowed light and mental wellbeing is shown, G122 is amended.
474. Stratum Management Limited [249.57-249.62] seeks to remove G120, G122 and G123 or appropriately qualify it.

475. James Coyle [307.28 and 307.29] seeks to amend the language in the Residential Design Guide to replace the term 'daylight' with 'sunlight'.
476. Guy Marriage [407.15] seeks an addition to the Residential Design Guide on how to manage sunlight considerations.
477. Ingrid Downey [443.2] seeks that the existing provisions relating to minimum sunlight in the ODP are reinstated in the Design Guides.

Assessment

478. In response to McIndoe Urban Limited's submission point [135.110], I consider that this minor heading change is unnecessary with the current heading being sufficient.
479. Regarding McIndoe Urban Limited's submission point [135.111], I consider that this suggested amendment to G118 is overly onerous as the majority of people reviewing the Design Guides (and implementing them in designing developments) will be designers, architects and planners who should know what 'direct natural lighting' is without needing to provide a definition.
480. Regarding McIndoe Urban Limited's submission point [135.112], I consider that amendment to move G118 is inappropriate, as G118 references 'light' and 'sun' and so it should be under the corresponding heading, as it is now in the PDP Residential Design Guide.
481. In response to McIndoe Urban Limited's submission point [135.113] regarding amending G119:
- a. I note that Council is stepping away from the ODP's Design Guides approach of having specific hour requirements in the Design Guides. Instead in the PDP Guides 'appropriate level and extent of sun access' are not prescribed in order to give Council flexibility at resource consent pre-application stage to undertake a case-by-case assessment.
 - b. I note the MDRS standards do not require standards for the minimum amount of sun, so the guidelines and standards are aligning with both the MDRS and NPS-UD intent.
482. In response to McIndoe Urban Limited's submission point [135.114] regarding G122, I consider that there is sufficient evidence linking natural light and mental wellbeing, and that the connection/reference to 'mental wellbeing' was for the link to 'natural light', not necessarily borrowed lighting. However, it would be expected that natural lighting would have a better impact on wellbeing than borrowed light.
483. Regarding Stratum Management Limited's submission points [249.57-249.58] regarding G120, I consider that G120 was not designed to be read as a standard nor to be implemented as one (none of the design guide guidelines are). Instead, it reflects that south facing units are not desirable from a light and sun provision perspective. This is rated two dots, with three dots having the highest priority. Whilst it says avoid, it also recognises and provides for in the

orange text underneath that there are circumstances where units may have to be south-facing.

484. In response to Stratum Management Limited’s submission points [249.59-249.62]:
- a. I note that G122 and G123 is not designed to be read as a standard nor to be implemented as one (none of the design guide guidelines are). Instead G122 and G123 is indicating that Council sees external windows in habitable rooms as important methods for enabling direct natural light and avoiding borrowed light.
 - b. I am aware of Building Code requirements and whilst this may go beyond the Building Code, it is important wellbeing outcome that residents, regardless which zone they are in should have access to. Resource consents for apartments with no windows in bedrooms are regularly received. Having this design guideline is an important hook for the resource consent application process.
 - c. I consider that windows that provide access to natural light is a requirement for human mental and physical wellbeing.
 - d. I note that the intent of this guideline is for quality residential outcomes for the city.
485. Regarding James Coyle’s submission points [307.28 and 307.29], I consider that the Residential Design Guide has purposefully used the wording it has to differentiate between daylight (natural light) and sunlight because they are two different outcomes being sought through the design guide.
486. Regarding Guy Marriage’s further submission point [407.15], I consider that natural light and sunlight are already addressed under Guidelines G118-122 and I consider that these adequately provide for sunlight considerations for new developments and impact on adjacent properties.
487. In response to Ingrid Downey’s submission point [443.2], I consider that an ‘appropriate level and extent of sun access’ was not included to keep design guidance general and to provide sufficient flexibility for case-by-case assessments under guidelines G118-122. In its PDP Design Guides, Council is stepping away from the ODP’s Design Guides’ specific hour provision focus in order to provide negotiation abilities at pre-application meeting. The MDRS standards do not require standards for the minimum amount of sun, so the guidelines and standards are aligning with both the MDRS and NPS-UD intent.

Summary of recommendations

488. HS2-P6-Rec111: That submission points relating to light and sun, natural light are accepted/rejected as detailed in Appendix B.
489. HS2-P6-Rec112: That G118-G122 be confirmed as notified.

5.31 Natural ventilation (G123)

Matters raised by submitters

490. Wellington Branch NZIA [301.26] seeks to amend G123 (Natural ventilation) to require opening windows on two separate facades. The Retirement Villages Association [FS126.237] and Ryman Healthcare [FS128.237] oppose 301.26 and seek that it be disallowed.
491. Guy Marriage [407.41] seeks that G123 (Natural Ventilation) is amended to mandate the provision of windows on two different facades, for the reason that research has shown a greatly increased ability for natural ventilation to actually work when there are opening windows on two separate facades, which allows far better pull through of natural ventilation.
492. McIndoe Urban Limited [135.115] considers that while G123 is sound in principle, this guideline which 'must be applied' may be problematic for apartments in noisy entertainment districts, and this situation must be recognised.

Assessment

493. In response to Wellington Branch NZIA's submission point [301.26], the Retirement Villages Association's further submission point [FS126.237], Ryman Healthcare's further submission point [FS128.237] and Guy Marriage's submission point [407.41]:
- a. This guideline is three dot rated showing the importance of providing natural ventilation to Council in terms of achieving good design outcomes and making for habitable residential dwellings. However, Council has put 'at least one' to provide flexibility and ability to undertake discussions with developers.
 - b. I acknowledge the benefits of having opening windows on two separate facades. Whilst I note that the guideline is drafted to say 'at least one openable window to an external wall', I consider that this is not inconsistent with the submitter's concern.
 - c. Council is setting a minimum requirement for quality outcomes.
 - d. I consider that best practice would be the provision of more than one window.
494. Regarding McIndoe Urban Limited's submission point [135.115], I consider that natural ventilation is a necessity and trumps the consideration around noise in entertainment areas. I consider that new buildings can be designed with noise insulation to mitigate noise impacts, as well as noise maximum level requirements for venues, whilst still enabling ventilation to developments.

Summary of recommendations

495. HS2-P6-Rec113: That submission points relating to natural ventilation are accepted/rejected as detailed in Appendix B.
496. HS2-P6-Rec114: That G123 be confirmed as notified.

5.32 Communal internal amenity (G124 – G129)

Matters raised by submitters

497. Stratum Management Limited [249.63 and 249.64] considers guideline 126 presents as a standard and would impose costs to multi-unit development, and seeks to remove or appropriately qualify G126.
498. McIndoe Urban Limited [135.116] seeks to clarify what is meant by 'large' at G126, and considers that this mandatory requirement might be relevant to a large apartment development, but might be irrelevant to a large, terraced housing development.
499. Stratum Management Limited [249.65] considers guideline 129 presents as a standard and is unclear on whether the requirement is for each and every residential unit, and seeks to remove G129.

Assessment

500. In response to Stratum Management Limited's submission points [249.63 and 249.64]:
- I consider that the guideline is not designed to be read as a standard nor to be implemented as one (none of the design guide guidelines are). Instead it is indicating that the provision of an internal communal room as an important outcome to provide social, cultural and community benefits in large multi-unit development.
 - I consider that the guideline provides flexibility as it talks to a multi-purpose communal room and it could be in a variety of different forms and configurations thus provides some flexibility for developers in terms of what space is provided. For example, it may depend on the community and open/public space facilities available in the wider block or suburb area.
501. Regarding McIndoe Urban Limited's submission [135.116] to have a definition of 'large multi-unit development', I consider that flexibility is needed for a site by site and development specific assessment. For example, it may depend on the community and open space facilities available in the wider block or suburb area.
502. Regarding Stratum Management Limited's submission point [249.65], I consider that the guideline is not designed to be read as a standard nor to be implemented as one (none of the design guide guidelines are). This guideline only has a one dot rating out of three and provides sufficient flexibility for developers, and it may be that implementing this guideline is not possible. I consider that each dwelling should try to achieve this guideline. For apartments it is more likely that tangihanga would occur in 2 or more bedroom units.

Summary of recommendations

503. HS2-P6-Rec115: That submission points relating to communal internal amenity are accepted/rejected as detailed in Appendix B.
504. HS2-P6-Rec116: That G126 and G129 be confirmed as notified.

5.33 Internal storage (G130 – G131)

Matters raised by submitters

505. Stratum Management Limited [249.66, 249.67, 249.68, and 249.69] seeks to remove guideline 130 (Internal Storage) and guideline 131 (Internal Storage) of the Residential Design Guide or greater qualification.

Assessment

506. In response to Stratum Management Limited's submission points [249.66 and 249.67] that guideline G130 presents as a standard, the guideline is not designed to be read as a standard nor to be implemented as one, none of the design guide guidelines are. Instead, it is indicating that Council sees the provision of adequate wardrobe space in the bedroom as an important outcome for residential dwellings to meet adequate capacity. The guideline has a two dot rating and provides sufficient flexibility through design. G130 leaves room for flexibility of discussion in the resource consent pre-application process or through a S92 response to address inadequate storage on a case-by-case basis.
507. In response to Stratum Management Limited's submission points [249.68 and 249.69] that guideline G131 presents as a standard, the guideline is not designed to be read as a standard nor to be implemented as one, none of the design guide guidelines are. Instead it is indicating that Council sees the provision of adequate internal storage space in residential units as an important outcome for residential dwellings to provide adequate storage to ensure anticipated household items can be adequately stored. The guideline has a two dot rating and provides sufficient flexibility through design. G131 leaves room for flexibility of discussion in the resource consent pre-application process or through a S92 response to address inadequate storage on a case-by-case basis.

Summary of recommendations

508. HS2-P6-Rec117: That submission points relating to internal storage are accepted/rejected as detailed in Appendix B.
509. HS2-P6-Rec118: That G130 and G131 be confirmed as notified.

5.34 Accessibility (G132 – G133)

Matters raised by submitters

510. Nick Ruane [61.13 and 61.14] (opposed by The Retirement Villages Association FS126.193 and FS126.194 and Ryman Healthcare Limited FS128.193 and FS128.194)] opposes G132 and G133.
511. Nick Ruane [61.15 (opposed by The Retirement Villages Association FS126.195 and Ryman Healthcare Limited FS128.195)] seeks that G133 is amended to:

G133. • Where possible, provide ground-level access that is accessible by people using wheelchairs, and design units ~~with reference to~~ which is compliant with NZ standards for access and mobility.

Consider things such as:

- Lever handles on all doors
- Easy to reach window sills, power sockets and light switches
- Sufficient space to access storage spaces and wardrobes
- Ensuring flush levels between rooms, at entryways, and shower access
- Ensuring smoke alarms have both visual and audible alerts
- Best practice guidance for accessible kitchen, laundry and bathroom design
- Best practice standards for signage legibility and colour contrast

512. McIndoe Urban Limited [135.117] seeks clarity for the use of the term 'are inclusive of' at G132.
513. McIndoe Urban Limited [135.118] considers that G133 might be an important aspect of achieving G132 but is given little weight.
514. Disabled Persons Assembly New Zealand Incorporated [343.20 and 343.33] considers that inserting the word 'impairments' rather than 'abilities' in clause G132 of the Residential Design Guide is more appropriate. Notes that using the term 'abilities' to refer to disabled people is regarded as euphemistic by many within the disabled community. They also consider that the other examples of impairment-based groups should be also identified in the last sentence of the same clause as follows:

G132. ••• Ensure developments are inclusive of people of all ages and ~~abilities~~ impairments, including the ageing population, children and pregnant women or parents with infants and toddlers, and people who use mobility aids such as wheelchairs and crutches.

515. Disabled Persons Assembly New Zealand Incorporated [343.21 and 343.34] has recommended two different amendments to G133. In submission point [343.21] the submitter considers that inserting 'ensure' rather than 'where possible, provide' in clause G133 of the Residential Design Guide provides greater compliance and uptake by designers, builders and developers. An amendment is sought as follows:

G133. • ~~Where possible, provide~~ Ensure ground-level access that is accessible by people using wheelchairs, and design units with reference to which is compliant with NZ standards for access and mobility.

Consider things such as:

- Lever handles on all doors
- Easy to reach window sills, power sockets and light switches
- Sufficient space to access storage spaces and wardrobes
- Ensuring flush levels between rooms, at entryways, and shower access
- Ensuring smoke alarms have both visual and audible alerts
- Best practice guidance for accessible kitchen, laundry and bathroom design
- Best practice standards for signage legibility and colour contrast

516. In [343.34] the submitter considers that the use of "where possible" in clause G133 of the Residential Design Guide is not appropriate and does not emphasise the need for greater compliance and uptake from designers, developers and builders. An amendment is sought as follows:

G133. • ~~Where possible, provide~~ ground-level access that is accessible by people using wheelchairs, and design units with reference to which is compliant with NZ standards for access and mobility.

Consider things such as:

- Lever handles on all doors
- Easy to reach window sills, power sockets and light switches
- Sufficient space to access storage spaces and wardrobes
- Ensuring flush levels between rooms, at entryways, and shower access
- Ensuring smoke alarms have both visual and audible alerts
- Best practice guidance for accessible kitchen, laundry and bathroom design
- Best practice standards for signage legibility and colour contrast

Assessment

517. Regarding Nick Ruane's submission point [61.13], The Retirement Villages Association's further submission point [FS126.193] and Ryman Healthcare Limited's further submission point [FS128.193], it is not clear what decision the submitter is seeking with regards to G132.
518. Regarding Nick Ruane's submission points [61.14 and 61.15], The Retirement Villages Association's further submission points [FS126.194 and FS126.195] and Ryman Healthcare Limited's further submission point [FS128.194 and FS128.195] relating to G133, I consider the amendment is too strict to say that design must be compliant with NZ standards for access

and mobility. G133 may not apply to all developments. The guideline seeks best practice, not compliance with standards (which are the bare minimum requirements).

519. In response to McIndoe Urban Limited's submission point [135.117], whilst I can understand the submitter's concern, G132 was purposefully designed to provide some flexibility in design in terms of what is meant by 'inclusive of' people of all ages and abilities, including the ageing population, children and pregnant women or parents with infants and toddlers.
520. In response to McIndoe Urban Limited's submission point [135.118], I note that G133 is a one dot rated design guideline because there are already New Zealand standards for access and mobility and Council cannot enforce beyond these standards. It also might not be possible that all developments can design for wheelchairs. G133 promotes best practice which may exceed what is required by current NZ standards for access and mobility.
521. Regarding Disabled Persons Assembly New Zealand Incorporated's submission points [343.20 and 343.33], I consider that this will encourage developments to be more accessible for a larger group of the population including those with mobility aids such as wheelchairs and crutches. I take the Disabled Persons Assembly New Zealand Incorporated's advice on terminology as a representative for the disabled community.
522. In response to Disabled Persons Assembly New Zealand Incorporated's submission points [343.21 and 343.34], I consider that 'ensure' or 'provide' are too direct by itself without the 'where possible' and does not provide sufficient flexibility for site by site consideration as part of urban design assessments. The 'where possible' reflects that this is a one dot rated guideline. G133 provides this flexibility, and reflects the rating system approach in the Design Guides and the rating given to this specific guideline.

Summary of recommendations

523. HS2-P6-Rec119: That submission points relating to accessibility are accepted/rejected as detailed in Appendix B.
524. HS2-P6-Rec120: That G132 is amended as follows:

G132. ••• Ensure developments are inclusive of people of all ages and abilities impairments, including the ageing population, children and pregnant women or parents with infants and toddlers, and people who use mobility aids such as wheelchairs and crutches.

525. HS2-P6-Rec121: That G133 be confirmed as notified.

6.0 Papakāinga Design Guide

526. This section addresses submissions and further submissions specific to the Papakāinga Residential Design Guide³.

Matters raised by submitters

527. Tapu-te-Ranga Trust [297.36 and 297.37] seeks to retain the introduction 'What is a 'papakāinga' of the Papakāinga Residential Design Guide, as notified.
528. Tapu-te-Ranga Trust [297.38] seeks to retain the introduction 'Coordination with Residential Design Guide' of the Papakāinga Residential Design Guide, as notified.
529. Tapu-te-Ranga Trust [297.39] seeks to retain 'Kaupapa' section of the Papakāinga Residential Design Guide, as notified.
530. Tapu-te-Ranga Trust [297.340] seeks to retain the guidelines of the Papakāinga Residential Design Guide, as notified.
531. Tapu-te-Ranga Trust [297.341] seeks to retain the glossary of the Papakāinga Residential Design Guide, as notified.
532. Greater Wellington Regional Council [351.337 (opposed by The Retirement Villages Association FS126.69 and Ryman Healthcare Limited FS128.69)] supports the Papakāinga Design Guide and the approach to providing for papakāinga using guiding Kaupapa, as long as this design guide does not undermine tino rangatiratanga. Greater Wellington Regional Council seek to retain the Papakāinga Design Guide with amendment. It is inferred that their amendment seeks to ensure the approach to providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land, and enabling Māori to express their cultural and traditional norms, has regard to direction from Policies UD.1 and UD.2 in Proposed RPS Change 1.
533. Greater Wellington Regional Council [351.338] seeks to clarify how the Papakāinga Design Guide will apply in areas outside the Tapu Te Ranga land.
534. Te Rūnanga o Toa Rangatira [488.98] seeks that the Papakāinga Design Guide is retained as notified [inferred decision requested].

Assessment

535. I acknowledge submission points by Tapu-te-Ranga Trust [297.36, 297.37, 297.38, 297.39, 297.340 and 297.341].
536. I acknowledge the submission point by Te Rūnanga o Toa Rangatira [488.98].

³ Papakāinga Residential Design Guide: <https://eplan.wellington.govt.nz/proposed/rules/0/326/0/0/0/31>

537. In response to Greater Wellington Regional Council’s submission point [351.337], The Retirement Villages Association [FS126.69] and Ryman Healthcare Limited [FS128.69], whilst I acknowledge their concerns, I suggest no change to the Papakāinga Residential Design Guide for the following reasons:
- a. I consider that the guide does not undermine tino rangatiratanga.
 - b. I also consider that the guide aligns with the direction in the Proposed RPS Change 1, and there is no need to change the guide. Plan change 1 to the RPS is yet to be determined.
 - c. I note that the Papakāinga guide is not targeted towards any particular group of Māori or to state who can design/build Papakāinga. It is to assist designers and Council staff in assessing the qualities of a Papakāinga application, which might have different design outcomes from a development that would usually fall under the residential guide.
 - d. As has been addressed in the Hearing Stream 1 S42A Report, Council's officer agreed that Council and mana whenua should work together to develop options for addressing Papakāinga in the PDP in a more in-depth manner than it does now. Council officer recommend this be undertaken by way of a plan change process.
538. Regarding Greater Wellington Regional Council’s submission point [351.338] which seeks to clarify how the Papakāinga Design Guide will apply in areas outside the Tapu Te Ranga land, I consider that Papakāinga Design Guide will apply to all applications equally regardless of the landowner. As has been addressed in the Hearing Stream 1 S42A Report, Council's officer agreed that the Council and mana whenua should work together to develop options for addressing Papakāinga in the PDP in a more in-depth manner than it does now. Council officer recommend this be undertaken by way of a plan change process.

Summary of recommendations

539. HS2-P6-Rec122: That submission points relating to Papakāinga Design Guide are accepted/rejected as detailed in Appendix B.
540. HS2-P6-Rec123: That the Papakāinga Design Guide be confirmed as notified.
541. HS2-P6-Rec124: That as per HS1-Rec25, Council and mana whenua work together to develop options for addressing Papakāinga in the PDP and introduce provisions by way of a plan change.