

QLDC Proposed District Plan 2016 Opening

We are here today on behalf of Woman in Architecture and our local NZIA group of architects.

Our submission will be detailed by Gillian and Erin.

Beginning – Main Point

The main point we would like to make. Is that this plan **does not currently create a pathway for outcomes we believe will be positive, strong and of quality**. The plan as it is currently written is more likely to leave a **low quality built environment** for Queenstown. So we want to ask - is that really what you want to achieve? Is that something that you would be proud of?

The plan has been designed to **promote densification** – which we as a group support. The potential problem with densification is that there is a very **real risk** that it can be **done badly**. When building is done **quickly, cheaply** and in a **compact environment**, with **little policing** of the design quality, the outcome is very likely to be of **serious concern**.

This plan has been designed to promote quick and affordable solutions. We agree that these are some of the considerations that should be addressed; **affordability however is not the only criteria for success**.

The only mechanism that can safely ensure a standard of quality for our built environment is the **Urban Design Panel**.

Any mention of this has been left out of this plan. The **reporting officer** in her summary of evidence has clearly stated she believes "*the UDP should occur on a non – mandatory basis*". She believes "*the recommended provisions will support good design outcomes*". As a group of Architects who work with the **district plan and other rules and guidelines on a daily basis** we can assure you that we **all** believe she is **very mistaken** in this view. This plan is completely open to some very poor outcomes which any developer looking to make a quick buck can take advantage of.

The reporting officer has also stated that **Garth Falconer supports this view**. This is completely different to what he has said in his report of the 7th October (paragraph 4).

"The high density residential zone requires sensitive design consideration and I have further recommended specific design guidelines and use of the UDP."

Middle – Town Planning v Architecture

Town planning and Architecture are two very different things. A person seeking to address a design by working to the "rules", is creating a building by saying is this black or white? **Good design comes from a great deal of thought, discussion, and reference to context**.

Queenstown has a **huge variety of styles, topography and contexts**. It would be impossible to address all of these different criteria with a set of rules in the district plan, and ensure a quality outcome for all.

We are very lucky to have an enormous number of experienced and knowledgeable architects and designers in our community. Let us **use this resource** as the correct expertise for this job. The **UDP is not a difficult mechanism**. It can in fact be seen by designers and architects as a **useful tool, and added benefit** to the design process. This dialogue will promote the quality of the built environment for future generations, which should be decided by experts in this field.

not by developers looking to do something as quickly and cheaply as possible.

If you **take nothing else away** from our submission today, realize the **value and benefit of a MANDATORY use of the Urban Design Panel for ALL** of the High Density Residential zone, and Medium density residential zone over 4 units. We will then feel confident that you are leaving a legacy for future generations, which is protected.

Closing – something to set this firm in their minds

This region grew up on the back of a gold rush. We are now arguably in the midst of a second gold rush. Let us not perpetuate the reputation of a “gold rush” legacy where buildings are put up quickly and cheaply and sub-standard architecture is created.

Both high & medium density by their nature is inherently more affordable as a form of construction. There is no requirement to cheapen this further, by compromising quality.

The buildings that will be created as a result of this plan will be here in Queenstown long after any of us have gone. Let your legacy be something we can all be proud of, and not an exercise in what not to do.

CLOSING

Plan change 10 – called for *“increasing the amenity of the high density zone”*.

This should be the main focus of any changes that come out of this review.

Do not leave this region exposed and completely at risk of a dominance of poorly designed buildings. Do not leave this region at risk that future generations will look at Queenstown as a study of what not to do.

It has been proven that you can destroy the natural beauty of a destination, with poorly considered and implemented buildings - so let us not rush – let's do this properly and create high quality assets for the future Queenstown. **Let us create a future we are all proud of.** A place that will continue to **draw more and more visitors**, not just because of the wonderful natural environment, but because of the **character and quality of the built environment** that sits happily alongside it, that **you all are significantly involved in creating.**

**Submission to PDP Hearing Stream 6 on high density housing by
Architecture+ Women Southern Branch, and NZIA Southern Branch**

21 October 2016

High density introduction

We wish to reiterate that our submission today is based on the 5 points we feel the plan has failed adequately to address. We talked to these issues at the hearing for the strategic direction

1. promote quality in all areas

2. urban growth boundaries are supported

3. Frankton is the twin centre to Queenstown (Queenstown growth strategy) and requires masterplanning which has yet to be done. Airport needs to be a good neighbour and the conflicting issues around the airport and the growth of Frankton need to be addressed.

4. Transportation needs to be addressed and connectivity between townships. However this has yet to be advertised as part of the PDP. We feel strongly that planning for growth cannot advance without the connectivity issues being addressed.

5. rural areas stay rural

High Density residential Zone

Our concerns

1. achieving high quality urban design outcomes through the use of the UDP/production of design guidelines/3d modelling of high density areas
 2. reinstatement of outdoor living areas, private and communal
 3. reduction of continuous building length to 24m
 4. flexibility on lot size or height with high quality design outcomes
 5. screening of service yards and heat pumps
- b. Ground level*

1. UDP

Upon reading the section 42a report, and subsequent revised chapter and comments

WE (southern architecture + Women and NZIA) believe all applications in the high density residential zone should be required to go through Urban Design Panel assessment.

Although the reporting officer in paragraph 3 (7 October) of her summary of evidence says

"Some submitters sought mandatory use of the UDP and more explicit provisions for quality urban design. I recommend the UDP continues on a non mandatory basis. My view as supported by Mr Garth Falconer , is that the recommended provisions will support good design outcomes"

this is contradicted by Mr Garth Falconers own report (7 October) which states in Paragraph 4

"The high density residential Zone requires sensitive design consideration and I have further recommended specific design guidelines and use of the UDP."

The reporting officer says that Residential Design guidelines may be considered, and is concerned with the subjective nature of such guidelines. We are similarly concerned that not only is her evidence weighted on the assumption of the unknown production of these guidelines, but the officer is also that concerned that such guidelines if ever produced may not give the desired outcomes.

We are also concerned that there has not been any input into these guidelines upon which the weight of her evidence appears to rest for her rejection of use of the UDP.

We are also concerned that the guidelines will result in boring and safe architecture, as people try to skim under the radar of scrutiny.

We believe our area deserves better quality and is more precious and design sensitive than any other area in New Zealand. We want excellent design outcomes, when did we settle for good?

I note that her earlier report mentions the proposed Otago Regional Council Policy statement

Proposed Otago Regional Policy Statement 2015 (PRPS) – Section 74(2) of the RMA requires that a district plan prepared by a territorial authority shall "*have regard to*" any proposed Regional Policy Statement. The PRPS was notified for public submissions on 23 May 2015, and contains the following objectives and policies relevant to the HDRZ provisions:

Objective 3.7 – Urban areas are well designed, sustainable and reflect local character.

Policy 3.7.1 – Using the principles of good urban design

Objective 3.8 – Urban growth is well designed and integrates effectively with adjoining urban and rural environments.

Policy 3.8.1 Managing for urban growth

Policy 3.8.2 Controlling growth where there are identified urban growth boundaries or future urban development areas

5.13. In relation to Objective 3.7, the RPS states: "The quality of our urban environment can affect quality of life and community viability. We need built environments that relate well to their surroundings...". Objective 3.7 and Policy 3.7.1 highlight the value of the urban environment and built form to community wellbeing, and the need to ensure retention of quality

These are statements which reinforce quality urban design. We cannot continue to make these statements and then not state how we are to achieve them. We believe the best assessment of urban design is made through the use of the UDP. Trying to pick out the appropriate words, picking at rules, does not promote holistic quality design.

We also believe that a 3d model of high density residential zones needs to be developed prior to the new areas being made operative. If this model were available then new developments can be assessed for effects in relation to its neighbour and other areas.

We seek that ratification of the high density zone does not occur without the production of design guidelines.

2. outdoor living

Outdoor living spaces need to be reinstated. We feel that in the rush to provide catch up cheaper housing we are compromising our future workers and generations. Residential units may be built cheaper but will not be sold more cheaply because of build cost. However they will all be built with a lack of outdoor space. This is not future proofing our housing quality.

Therefore we are proposing a hybrid rule that requires outdoor living space, but on some occasions this could be traded for communal outdoor space. We feel strongly that we are an outdoor environment with spectacular views and air, and everyone should be able to enjoy that. Rooftops can be encouraged to be living spaces.

3. continuous building length

We are not satisfied with the amendment to the 30m rule and upon reflection we would like a 24m limit on any floor. We have a scale built on small lot sizes, and although we are going to be denser we do not want monolithic building. We seek lower thresholds that will trigger assessment for articulation in buildings

4. Flexibility

On the whole, we feel the rules are easily understood, although they do not demand design quality and that is of concern to us. We have not been able to agree on a minimum lot size but agree with Garth Falconer that if there was mandatory assessment by the UDP we would support no minimum lot size. flexibility on height could be similarly assessed.

5. screening

Heat pumps and other mechanical ventilation needs to be screened.

PROVISION/ISSUE	SUPPORT/ OPOSE	COMMENTS	SUBMISSION
9.2.2.7	Support changes		
9.2.3.1	Support deletion of floor area ratio		
9.2.3.2	Support with amendment		<p>(add words) Where development standards are breached, <u>impacts on the amenity values of neighbouring properties and on public views (especially towards lakes and mountains) are assessed against councils 3D model.</u></p>
9.2.3.3	Support with word change		<p>(add underlined word) Offsetting of habitable windows</p>
9.2.5	Support with changes	Live work play important area here, want to support hairdressers, architects offices, cafe, but not say a car showroom.	<p>(add underlined words) Commercial development is discouraged except when it is small scale and <u>supportive of surrounding community.</u></p>
9.4.4	Do not support without inclusion of UDP or at least reference to seven "c"	Needs to include extra wording and fully discretionary . After all everything is being assessed already for "design" -so its not really restricted at all.	<p>(add assessment matter) All residential units in the high density zone shall <u>shall be assessed for quality urban design by the principles of <i>by the UDP.</i></u></p> <ul style="list-style-type: none"> • <u>Context, Character, Choice, Connections, Creativity, Custodianship and Collaboration.</u> • The location etc.....
9.5.1	Support with additions	Needs assessment as above	<p>(add assessment matter) Where a proposed building etc.. • <u>shall be assessed for quality urban design <i>by the UDP</i></u></p>

			<p>by the principles <u>(Context, Character, Choice, Connections, Creativity, Custodianship and Collaboration.)</u></p>
9.5.5 add in outdoor living space	amend	Need quality development with articulation of facades and quality outdoor areas	<p>(add in outdoor requirement) Each residential unit shall have a private outdoor living space equivalent to 5% of the unit floor area, and each development shall provide communal outdoor space equivalent to 20% of land footprint. These areas can be provided in a variety of ways (ie rooftop terraces), and areas may be interchangeable.</p>
9.5.5	Support in part		
9.5.7	change	Don't think it provides enough certainty for a good design outcome..Needs a diagram. Reduce to 24m at any level. Assessment by UDP will reduce need for assessment matters	<p>(reduce length and add in diagram) The length of any building face shall not exceed 24m at any level. (diagram)</p>
9.5.9	Add in service yard space	Need to screen messy yards, noisy heatpumps	<p>(add words) Waste, recycling, <u>service yards</u> and storage space</p>
definitions	Add in one for "quality urban design"		<p>All developments...<u>screen heat pumps</u> (Add in definition) <u>Quality urban design:</u> Adheres to principles of</p>

			<p>Context, Character, Choice, Connections, Creativity, Custodianship and Collaboration.</p>
Sloping site	Dont support	<p>The front of a site is often level. In old definition if one side was steep then all considered as a sloping site. This makes it confusing and difficult and almost impossible to reconcile. Keep existing definition.</p>	<p>(Keep old ground level rule in, add words back in) <u>Ground slope in relation to building height shall be determined by measurement over the extremities of each building elevation. Where any elevation indicates a ground slope of greater than 6° (approximately 1:9.5) no part of any building shall protrude through a surface drawn parallel to and 7.0m vertically above the ground.</u></p>

Submission to PDP Hearing Stream 6 on Medium density housing by
Architecture+ Women Southern Branch, and NZIA Southern Branch

21 October 2016

Medium density introduction

We wish to reiterate that our submission today is based on the 5 points we feel the plan has failed adequately to address.

1. promote quality in all areas

2. urban growth boundaries are supported

3. Frankton is the twin centre to Queenstown (Queenstown growth strategy) and requires masterplanning which has yet to be done. Airport needs to be a good neighbour and the conflicting issues around the airport and the growth of Frankton need to be addressed.

4. Transportation needs to be addressed and connectivity between townships. However this has yet to be advertised as part of the PDP. We feel strongly that planning for growth cannot advance without the connectivity issues being addressed.

5. rural areas stay rural

We see the main issues we wish to speak to in regard to medium density chapter are

1. High quality development is demanded (principle 4 of Queenstown growth strategy)
2. .Privacy not properly accounted for in absence of properly articulated design review
3. Assesment matters included for all buildings in this area not just for developments of 4 or more (amend to a discretionary regime)
4. Urban Design panel review requirement for 4 or more residential units
5. Residential guidelines are produced before PDP is ratified
6. continuous building length of 16m is supported but still seek clarification
7. lot size, support discretionary regime.
8. building height is discretionary to allow for height infringements if well designed etc..
9. Refuse Yards
10. Outdoor space

1. High quality

The most important issue is densification and the potential effects of densification. Council has identified that many of the older areas are in fact close to town and areas of work and are suitable for densification and increased connectivity through public transport. This is the driver for allowing smaller lot sizes and infill to occur. Greenfields subdivisions are already being undertaken with lot

sizes of 450 or even less. The main areas to be affected by these new rules will be older areas of Queenstown and Wanaka located around Queenstown, Frankton and Wanaka townships.

Their location is highly suitable to increasing densification provided that privacy and design issues are adequately addressed. We submit even more areas could take greater density.

2. Privacy

Better rules and assessment for privacy

3.assessment matters included for all buildings under 3 units and rule RD (not permitted)

We are concerned with deletion of rule around window height in that there are still no rules around privacy or quality building for developments of 3 residential units or less. We stand by our original submission that all medium density should be assessed by the UDP, as that is where it is easiest to demonstrate sound design for privacy and urban quality. At least, we request this is moved from Permitted to Restricted Discretionary with similar assessment matters as for development of residential units over 4. With the removal of the onerous privacy rule about window height, (which talked about opaque windows instead of translucent windows) unfortunately there is now no requirement to safeguard privacy and there are no assessment matters to promote quality design for developments under 3 units. (will developers apply for consents in blocks of three residential units to escape assessment?)

4. urban design panel review for developments of 4 or more residential units.

5. Residential design guidelines are produced before the plan is ratified

6. continuous building length, inclusion of interpretive diagrams.

7. minimum lot size

We agree with Mr Falconer on the rationale for reduced lot sizes but we see the larger lot size will hopefully be a trigger point for design review should smaller lots be sought.

8.building height

the planner is concerned about increased height but could be allowed if UD review undertaken tht is supportive etc. Think this should be discretionary because NC far too harsh. Steep sites. Difficult to comply at best of times.

9. Service Yards

Broader consideration of service yards, for mechanical services, refuse and washing lines etc.


10. Outdoor space

We propose a mixed rule as for high density. Some provision for outdoor space should be in the plan.

PROVISION/ ISSUE Medium density residential Chapter 8	SUPPORT/ OPPOSE	COMMENTS	SUBMISSION
8.2.2	Support changes with additions	There is a lot of reference in the Plan to enhancing or protecting the character of Arrowtown and Wanaka, but fails to be visionary on how we want Queenstown and Frankton's built environments to develop. The plan should promote a unique Queenstown / Frankton built environment which compliments our outstanding natural landscape and enriches the Queenstown experience for locals and visitors.	ADD 8.2.2 positively responds to the site ,neighbourhood, <u>character</u> and wider context
8.2.2.6 require development take account of any council adopted design guide ...etc	Support	Concern that these are not being developed, request no ratification of plan until this is done.	KEEP wording
8.2.3.2 ensure built form achieves an acceptable level of privacy...etc	Support with additional assessment matters and change from P to RD for residential units 3 and under (rule 8.4.10)	Needs to support quality design through urban design review. Although privacy is talked about here there are no assessment matters for developments of residential units 3 and less	
8.2.3.3 ADD IN	Add words	UDP review for all residential unit development of 4 or more This supports "demand quality design in all development" urban	(ADD) <u>All development of residential units of 4 or more be will be subject to Urban Design Review</u> <ul style="list-style-type: none"> • <u>And will be assessed with Rules 8.4.11 &</u>

		growth strategy.	8.4.22 (no need to have separate additional rules for Wanaka Town Centre Transition Overlay)
8.4.10 residential unit 3 or less	Do not support Permitted regime with no assessment matters	No assessment matters that support policies and objectives. Concerns about quality, privacy and overlooking. change to RD.	(add underlined words) Change to RD and put in assessment matters as per 8.4.11 (including below)
8.5.10	Add a broader rule in regard to privacy between neighbouring properties.	Setbacks and recession planes cannot guarantee privacy from overlooking	Privacy between neighbouring properties: All windows overlooking the private open space and main living areas of adjacent dwellings from upper level rooms are screened by either: A. raising sill heights b. solid balustrading c. translucent glazing d. on site landscaping e. or other methods illustrated through modelling
8.4.11 residential unit 4 or more	Do not support without inclusion of a mandatory Urban Design Panel review or at least reference to seven "c" of the New Zealand Urban Design Protocol.	Needs to include extra wording and fully discretionary . After all everything is being assessed already for "design" - so its not really restricted at all.	(add assessment matter) All development of residential units of 4 or more in medium density zone be will be subject to Urban Design Review: All residential units in the high density zone shall shall be assessed for quality urban design by the principles of Context, Character, Choice, Connections, Creativity, Custodianship and Collaboration (Privacy assessment matter as per 8.5.10 above if urban design review not included) Privacy between neighbouring properties:

			<p>All windows overlooking of the private open space and main living areas of adjacent dwellings from upper level rooms are screened by either</p> <ul style="list-style-type: none"> A. raising sill heights b. solid balustrading c. translucent glazing d. on site landscaping e. offsetting windows f. or other methods illustrated through modelling
8.4.22	Additional Rules for Activities in the Wanaka Town Centre Transition Overlay	Apply these rules to the to 8.4.11, don't have a separate subzone rule. Medium areas of Aspen Grove, Park Street & Frankton. "storage Areas are appropriately located and screened" is covered under rule 8.5.10 covered later. (Potential to delete this)	
8.5.9 Continuous building length	Should remain at 16m	Don't think the continuous building length should be increased to 24m. Should remain at 16m and if you go longer you can prove you have reduced the overall building dominance via various means. (Stepped façade, façade articulation) (Assessed by an Urban Design Panel)	16m Continuous building length should reference how it relates to the individual units. (Does this apply to side yards only?) Typically in medium density developments

		<p>the front and back elevations are expressed as individual units.</p> 	
<p>8.5.1 Building Height</p>	<p>Do not support NC status</p>	<p>Could be more flexible if great design and other circumstances are right. Non complying is too rigorous. Would support Garth Falconers 10m but not without UDP review. Support 8m if discretionary regime. Then at least opportunity to go over. 8m very restrictive on our sites.</p>	<p>CHANGE STATUS TO discretionary</p>
<p>8.5.10 Privacy between neighbouring properties</p>	<p>Deletion of Window Sill Heights clause. Need to keep a rule to address privacy, but less prescriptive.</p>	<p>Density and Privacy Studies have established that density and privacy are interdependent and that achieving acceptable standards of privacy is a key issue in the design of socially successful higher density housing.</p>	<p>Privacy between neighbouring properties: All windows overlooking of the private open space and main living areas of adjacent dwellings from upper level rooms are screened by either A. raising sill heights b. solid balustrading</p>

		<p><i>In ... housing of two or more storeys, overlooking of the private open space of adjacent dwellings from upper level rooms represents one of the most common privacy problems."</i></p> <p>(A report on Best practice in medium density housing design for Housing New Zealand Corporation September 2004)</p>	<p>c. translucent glazing d. on site landscaping</p> <p><u>To be demonstrated by overlooking sectional diagram.</u></p>
<p>8.5.10 Waste and Recycling Storage Space Change to Service Yards</p>	<p>Broaden clause to include clothes drying areas, Heat Pumps Fuel storage etc.</p>		<p>This clause should be extended to included provision for screened designated clothes drying areas, and screening of heat pump, gas bottle storage, as inadequate provision and utilisation of these is one major contributing factor that heightens the negative perceptions of denser housing typologies.</p>
<p>8.5.15 Outdoor living space</p>	<p>add in new clause</p>	<p>Need quality development with articulation of facades and quality outdoor areas. Should have some requirement for outdoor living be it in backyard or wherever, but should be demonstrated to be useful space. More likely to be vertical buildings with small rear or front yards. but still needs minimum in balcony or yard space. Less than for low density but more than high density.</p>	<p>(add in outdoor requirement) <u>? The minimum provision of outdoor living space for each residential unit contained within the net area of the site within the medium density residential area shall be 20m² with a minimum dimension of 4.0m</u></p>

**Submission to PDP Hearing Stream 6 on low density housing by
Architecture+ Women Southern Branch, and NZIA Southern Branch**

21 October 2016

low density introduction

We wish to reiterate that our submission today is based on the 5 points we feel the plan has failed adequately to address. We talked to these issues at the hearing for the strategic direction

1. promote quality in all areas
2. urban growth boundaries are supported
3. Frankton is the twin centre to Queenstown (Queenstown growth strategy) and requires masterplanning which has yet to be done. Airport needs to be a good neighbour and the conflicting issues around the airport and the growth of Frankton need to be addressed.
4. Transportation needs to be addressed and connectivity between townships. However this has yet to be advertised as part of the PDP. We feel strongly that planning for growth cannot advance without the connectivity issues being addressed.
5. rural areas stay rural

We see the main issues we wish to speak to in regard to low density chapter are

1. retention of outdoor living courts
2. support of articulation of infill dwellings as proposed with varying heights
3. amendment to avoidance of flat roofs in Arrowtown
4. reference to residential design guidelines
5. retention of ability to subdivide inside noise boundaries controlled by airport.
6. Continuous building length
7. inclusion of diagrams

We have read the reporting offices section 42a report and fail to understand how the 1st issue can be growth and affordability. By nature low density housing is the least affordable sort of housing for the community as it is less likely to be located in areas of public transport and close to work places.

The most important issue is densification and the potential effects of densification. Council has identified that many of the older areas are in fact close to town and areas of work and are suitable for densification and increased connectivity through public transport. This is the driver for allowing

PROVISION / ISSUE	SUPPORT / OPPOSE	COMMENTS	SUBMISSION
Chapter 6 low density residential			
7.2.2		.	Does not occur within the Queenstown airport noise boundary or outer control boundary
7.2.3.3		Why delete its only talking about encourage	Add in <u>Encourage initiatives to reduce water demand and water use, such as roof rain water capture and greywater recycling</u>
7.2.5.2		Delete reference to flat roofs avoidance	Flat roof housing forms are avoided
7.4.10		Airport reference to prevention of subdivision in the ocb and any other bits in this chapter	(b) sites located with the air noise boundary or located between air noise boundary and outer control boundary of Queenstown airport
Insert rule for outdoor areas as per odp		As per recommendations of urban designer	Add <u>The minimum provision of outdoor living space for each residential unit contained within the net area of the site within the low density residential area shall be 36m² with a minimum dimension of 4.5m²</u>
7.5.3	Needs diagrams	Not sure about implications. Has this been modelled, can sites be swapped for height?	Add in interpretative diagrams
7.5.11	amend	Still not clear add interpretative diagram	<u>The length of any building facade above ground level shall not exceed 16m</u>

7.5.12	amend	Although not amended earlier this forms part of our submission on medium and high density where we want to add in "service yard" term and screen heat pumps and gas bottles	<p>Waste, recycling and service yards</p> <p>7.5.12.1 Residential activities shall.....and screen gas bottles and heat pumps located in side yards.</p>
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