

## 1. Introduction

- 1.1. My name is Paula Clarke, I have worked in Architectural Design in the Hutt Valley for 14 years, lived here for 10 years and have run a small Architectural Design practice for 9 years.
- 1.2. GO architecture generally works with small scale, residential renovation projects. This is a constant challenge, in both the building and planning spaces. In particular because most rules are written with an eye to new buildings and developments. Rules generally appear to give consideration to managing new buildings and developments, with less thought given to unintended impacts on smaller scale works.
- 1.3. We regularly have to deal with rules that are not well suited to small scale renovations, this leads to disproportionate costs for our clients – these are locals working hard to make ends meet, and wanting to improve their standards of living.
- 1.4. It is our intention to help ensure that unintended consequences are avoided as much as possible in the new plan, and that the rules do not unfairly capture situations that we not intended to be captured.
- 1.5. I want to say thank you for all the work done to date on this process and it is heartening to see that many of my suggestions have been accepted.
- 1.6. I have read the Report from council regarding some of my submission that has not been accepted and would like to further comment on those items.

## 2. LLRZ-S1

- 2.1. With regards to 297 (page 81) my request has been accepted in that the gross floor area for minor residential units be increased to allow for 70sqm. When I made my first submission the full information was not yet available regarding the NES – DMRU and I would like to highlight that the measure of a gross floor area (which includes exterior walls and cladding) in your District Plan definitions differs from the measure of floor area in the National Environmental Standards for Detached Minor Residential Units which is defined as the internal floor area, which is also aligned in the Building Act Schedule 1A floor area measurement.

- 2.2. We often encounter challenges with measuring building areas as there are several different methods depending on where you are and for what purpose you are measuring the area. Any opportunity to make the different methods align should be taken.
- 2.3. I suggest that the standard LLRZ-S1 3. Be amended to change gross floor area to internal floor area to align with the NES-DMRU.

### **3. LLRZ-S2, MRZ-S2, HRZ-S2**

- 3.1. With regards to item 304 (page 83) which relates to the exclusion of low level decks from the calculations of building footprint, thank you for accepting this change, it will have a material impact on homeowners living in homes constructed with timber floors and in flood areas.
- 3.2. On a related note and further to my submission on the Definitions Chapter. I was advised that my request to alter the definition of a building footprint was not possible due to definitions coming from a more centralised approach. I would like to submit that the building footprint should exclude eaves of up to 600mm – to be added to the list with the decks exclusion. This should apply in all the residential zones.
- 3.3. The importance of eaves was covered in my submission in hearing stream #1, this included solar control, protection of property from damage during storm events, and lower maintenance requirements.
- 3.4. The current definition will encourage more construction with minimal or no eaves – even when trends may change. This would have a detrimental impact on the citizens of the Hutt Valley for decades to come. We seek to avoid poor building outcomes due to planning restrictions leading to less robust design approaches.
- 3.5. I would also like to note that the definition currently including eaves is at odds with the previous definition in past district plans. When the MDRS first rolled through, it appeared that we would be able to increase site coverage as it went from 35 – 50% - however, at the same time the definition which used to exclude eaves, now added them in – so the effect was essentially a status quo site coverage, unless you removed eaves from your designs – which is what we have seen happening.

**4. LLRZ-S5, MRZ-S5, HRZ-S5**

- 4.1. With regards to item 315 (page 85) which relates to the exclusion of low level decks from the calculations of building setback, which was accepted in part, I agree with the approach taken to manage privacy concerns while also being more suitable for a typical home floor level.

**5. MRZ-S10, HRZ-S10**

- 5.1. With regards to item 330/331 (page 89) it is stated that the concerns raised around site specific factors should be considered on a case by case basis, such as through the resource consent process. My concern is the cases that may be caught by this rule, and be the only factor that triggers the requirement for a resource consent. This is particularly of concern in situations where there are existing houses, with minimal renovation work being undertaken, that may not comply with this onerous requirement as the existing house may not comply.
- 5.2. I recognise that a balance is required to avoid complexity and blanket rules that enable the standards to be undermined. I also recognise that some of the situations raised may be rare – but this can be an expensive and wasteful exercise when a rule is too loose and ends up being applied too broadly.
- 5.3. The current wording is very loose and not clear when it would or would not apply it refers to “facing the street” which is not defined. What would be the requirement for a house on a rear site, with no road frontage – would that still be considered to face the street? If a house is at the bottom of a gully, down a winding driveway – such as can be the case in the hill suburbs – is that considered to be facing the street?
- 5.4. The other issue is existing housing. For example where an existing house may not currently achieve the 20% requirement, say it had 10% glazing on the frontage, and the owner wanted to build a bedroom extension to the side that had 20% glazing facing the street on the extension. In my opinion that is what should be measured and the extension would be compliant. However, given the current wording of this clause the owner would presumably be in the position that that would have to 100% glaze that wall of the bedroom to bring the entire frontage into compliance – unless they forked out several thousand dollar for a

resource consent – which includes not only council fees, but also design fees and the cost of a planning company to compile the submission.

- 5.5. Allowing for a limitation of the rule to only apply to new buildings, or new parts of buildings would be a suitable remedy and would not be a blanket rule with wider consequences. This would acknowledge the existing built environment and enable homeowners to improve their home, without having to retroactively change elements of the existing building.
- 5.6. The final issue which was raised is to do with energy efficient design. We have seen rules across various councils in the past, that seek to control elements facing the street without consideration to good design principles to ensure that homes remain warm. We recognise that it is desirable to have windows facing the street, but this must be balanced with design principles to ensure that people can stay warm in the winter.
- 5.7. BRANZ advice on passive design indicates that windows can account for 40% of heat losses where the home is built to base building code – therefore good window design is critical. They recommend that north facing windows should be approximately 10 – 15% of total floor area, where solar access is good. East facing windows should be less than 5% of floor area and South and West facing windows should be less than 3% of floor area.
- 5.8. To translate floor area to wall area I'll assume a 120sqm house with a front elevation of 8m x 3.5m average height (28sqm). 15% of floor area would be the equivalent of 64% of the front elevation being glazed. 5% would be the equivalent of 21% of the elevation and 3% would be the equivalent of 13% of the elevation. While these numbers would vary with the size and shape of a house, this demonstrates that these rules will limit the ability for designers to consider energy efficient design on their projects. It is my opinion that planning rules should consider south and west facing windows when making rules that require a minimum window area. This is not a rare occurrence that a house may have a road to the south or west of the building.
- 5.9. A possible remedy would be for the rule to say 20% glazing facing the street, except where the glazing percentage on the south or west facing windows (within 45 deg of south or west) would exceed 3% of the total internal floor area, in which case 15% minimum on those faces.

**6. GRUZ-R6, RLZ-R7**

6.1. I submitted that a minor residential unit should be reduced from 80sqm to 70sqm, this was rejected. In light of the information previously raised regarding how to measure the floor area I submit that this should be changed to an internal floor area measurement.

6.2. I do believe that it would be sensible to set this at 70sqm internal dimensions, so that complexity is generally minimised and rules are more consistent throughout the plan. I note that 70sqm internal dimension when built with 90mm framing + 30mm of cladding is 74.84 sqm gross and with 140mm framing is 76.6 sqm gross.

6.3. Regardless of the area that you settle on I request that you use the internal dimension measurement for consistency across planning rules.

**7. Additional comments regarding HRZ-S8**

7.1. I see that the response to this was to accept in part the change to measuring the outdoor area with a circle with a diameter of 3m. I have now read through the report regarding the business zones and while I understand this hearing is not about the business zones I see that the reviewer rejected this same proposal for MCZ-S9, NCZ-S9 and LCZ-S9 on the basis that it would be different that the outdoor living measures in the Medium and high density zones and would therefore complicate the plan and its administration. Given that this suggestion has been accepted in this residential zone, I think it is appropriate for those other zones to review the reasoning for the rejection as adding this in would now make it more consistent overall.