

7 August 2023

To: Hearing Panel,
Commission
for the WCC's Proposed District Plan.

JCA Submission for the Wrap Up on ISSP session including Streams 1 to 5

Introduction

The purpose of this submission of the Johnsonville Community Association Incorporated (JCA) to the Commission on the Proposed District Plan (PDP) for 2024-2034 is to clearly set out for the Wrap Up on ISSP session:

- the consequential effects of the **significant decisions** yet to be made by the Commission, and thereby ensure that
- the resulting District Plan for Johnsonville is a fully integrated plan in relation to those **significant decisions**.

The Proposed District Plan for Johnsonville

Under the PDP, Johnsonville is targeted by the WCC as the ideal place for High Density suburban residential development. The combination of factors identified by Council officers has led to the plan for Johnsonville to have 6,000 more residents which is the highest percentage growth (60%) of any location outside the CBD.

The JCA in its submissions across all Hearing Streams has challenged many of these factors that Council officers claim support this very high growth target.

Significant Decisions That Determine Johnsonville's Future Plan

Rapid Transit Service Issue

From Stream 1, the JCA submitted to the Commission that the train service on the Johnsonville Rail Line was not a "*rapid transit service*" because the service does not meet the NPS-UD criteria for a "*rapid transit service*". If the Commission agrees with the JCA's position regarding this matter, then the following consequential effects would occur:

- The Commission would recommend to Council that the Johnsonville Rail Line train service was not a "*rapid transit service*", and
- The Commission would recommend to Council that the Johnsonville Rail Line train stops were not "*rapid transit stops*", and

- The expected population growth forecast for Johnsonville, due to the assumption that the Johnsonville Rail Line is a “*rapid transit service*” would need to be reduced accordingly. This reduction is significant. And
- The reduction in the population growth forecast would therefore also have a consequential effect on reducing the maximum height of buildings in Johnsonville’s High-Density Residential Zone (HRZ) and the Metropolitan Centre Zone (MCZ), and
- If the Johnsonville Rail Line is not a “*rapid transit service*”, this reinforces the importance of Johnsonville’s walkable catchment not being greater than 5 minutes (i.e. the MDRA which is 10 minutes from the town centre).

Walkable Catchment Issues

From Stream 1, the JCA submitted to the Commission that Johnsonville’s walkable catchment should not include Areas A, B and C and should be the same as the MDRA (Medium Density Residential Area) that was agreed with the Environment Court in 2013.

The JCA also stated the proposed extent of the walkable catchment was excessively large because it was 10 minutes walking from the **edge** of the Metropolitan Centre. This position is because Johnsonville does **not** have the range of services of the Wellington CBD and is **not** connected to other major centres with a Rapid Transit Service.

If the Commission agrees with the JCA’s position regarding this matter, then the following consequential effects would occur:

- The High-Density Residential Zone (HRZ) area for Johnsonville would be reduced by excluding Areas A, B and C, and
- The HRZ would be reduced in other directions to reflect the actual amenity and level of service provided by Johnsonville, and
- The expected population growth forecast for Johnsonville’s HRZ would be reduced accordingly.

Maximum Building Height for the HRZ Issue

From Stream 2, the JCA submitted to the Commission that it would support a maximum building height for the High-Density Residential Zone of “*up to 6 storeys*” (including requiring a resource consent if a developer wanted to build higher than this) and that the JCA did not support either:

- a building height of “*at least 6 storeys*” for the building height in the HRZ, or

- the application of the Council’s City Outcomes Contribution proposal to the HRZ in Johnsonville.

If the Johnsonville Rail Line is not a rapid transit service then the consequential effects from this decision is that there should be a lower building height, (because the population growth is not supported by a rapid transit service), within Johnsonville’s HRZ which could be possibly either:

- The maximum building height for the Kilbirnie HRZ given that Kilbirnie is also a metropolitan centre like Johnsonville, or
- A maximum building height of up to 4 storeys. In JCA’s submission for Stream 2 we indicated that there was reasonably strong support, via a Council survey of outer suburbs residents, for a maximum height of up to 4 storeys for HRZ in the outer suburbs.

Maximum Building Height for the MCZ Issue

From Stream 4, the JCA submitted to the Commission, via its Presentation submission, it’s position in relation to the maximum building height for the Johnsonville Metropolitan Centre Zone (MCZ) as follows:

- The JCA opposes the WCC Johnsonville MCZ maximum height increase to 10 Storeys WITH the City Outcomes Contributions.
- Our first preference is a maximum height increase of 8 storeys (27 metres) WITHOUT any City Outcomes Contribution. The JCA notes that this is what the WCC consulted the public as part of the Draft District Plan and the higher 10 storey height has never been subject to public consultation.
- Our second preference is Johnsonville should have either:
 - 8 Storeys WITH City Outcomes Contribution up to a 25% increase only i.e. a maximum height of 10 storeys or 35 metres, or
 - 10 Storeys (35 metres) WITHOUT City Outcomes Contribution.

The MCZ has been earmarked in the PDP for high density residential accommodation. If the Johnsonville Rail Line is not a rapid transit service then the consequential effects from this decision is that there should be a lower building height, (because the population growth is not supported by a rapid transit service), within Johnsonville’s MCZ which could be possibly either:

- The maximum building height for the Kilbirnie MCZ given that Kilbirnie is also a metropolitan centre like Johnsonville, or
- A maximum building height of up to 6 storeys which is the minimum under the “at least 6 storeys” requirement for metropolitan centres under the NPS-UD.

The expected population growth forecast for Johnsonville’s MCZ, would also be reduced accordingly.

City Outcomes Contribution for HRZ Issue

In Stream 2 and again in Stream 4 the JCA objected to the proposed City Outcomes Contribution proposal that rewarded “good” developments with higher height limits. The JCA stated the application of City Outcomes Contribution to the HRZ is especially bad because of the impact on neighbouring residents and because the certainty in permitted heights is especially important in residential areas. Further, Council officers have not presented any evidence to support the need to apply the City Outcomes Contribution to residential areas.

In relation to both Stream 2 and Stream 4, the Commission is asked to note that the Council officers did not respond to submitters’ recommendations concerning the application of the Council’s City Outcomes Contribution proposal to the HRZ during this Stream. Following representations from the JCA to the Commission, an action was placed in paragraph 2. xxiv of the Commission’s Minute 26 on Council officers to respond to submitters’ recommendations as follows:

The s42A report for Hearing Stream 2 deferred addressing all submissions on the application of the City Outcomes Contributions to residential zones to Hearing Stream 4,¹ but some submitters have commented that their submission on this matter had not been addressed (for example, Johnsonville Community Association, Submitter 429); where has this matter been addressed?

¹See s42A report on HS2 High Density Residential Zone, paragraph 299

To date, it is not clear whether Council officers have carried out the work to provide a response to submitters’ recommendations.

It is imperative that this critical issue, which potentially could increase building heights above stated maximum building heights across all of Wellington city, is able to be challenged during the Wrap Up session. Alternatively, if there has been no response from Council officers to submitters’ recommendations then the Commission should consider whether it rules that the City Outcomes Contribution provision should not apply to the city’s HRZs.

Infrastructure Shortfalls to Be Fully Rectified Before Intensification Issue

Throughout the JCA’s submissions and presentations to the Commission for Streams 1, 2, 4 and 5, we have repeatedly emphasised the absolute importance of infrastructure shortfalls being fully rectified, and the infrastructure in place, BEFORE intensification is implemented. The JCA particularly wants to see any shortfalls, in the following areas, fully rectified BEFORE intensification takes place:

- Public transport infrastructure shortfalls, and

- Local transport management infrastructure shortfalls, and
- Three Waters infrastructure shortfalls, and
- Water pressure infrastructure shortfalls, and
- Sufficient width in relation to:
 - access roads and paths, and
 - between boundaries, and
 - for all setbacks including stepped setbacks, and
- Permeability infrastructure shortfalls, and
- Green space infrastructure shortfalls.

The above requires fully integrated urban planning to take place. The NPS-UD requires metropolitan centres to be well-functioning urban environments. This requires urban planning excellence, and therefore fully integrated urban planning, to occur.

Conclusion

The JCA challenges the Council officers' claims that Johnsonville is an ideal site for major residential developments. We are proud of our suburb, but we also recognise its deficiencies in transport access, failing retail centre and shortfalls in its infrastructure. Proper recognition of this in the PDP is critical to ensure we aim for a lower level of population growth, one that is appropriate to Johnsonville' circumstances and capacity.

The decisions about this PDP are the biggest change to the city of Wellington in at least the last 50 to 60 years if not longer than that. Decisions about the PDP will affect Johnsonville in particular for the next 50 to 100 years. It is therefore fundamental that those decisions are sound and right. Prescient wisdom is the pre-eminent requirement to achieve this together with fully integrated planning to ensure that the end outcomes are well functioning urban environments.

Warren Taylor
on behalf of the Johnsonville Community Association