

Hearing Stream 2 – Residential Wellington City Council

In the matter of Proposed District Plan review

Hearing Stream 2 - High Density Residential Zones – Ngaio Residents Submission from Antony Kitchener and Simin Littschwager.

Date submitted: 27/03/2023

Hearing Chair: Trevor Robinson

Hearing Panel: Heike Lutz, Liz Burge, David McMahon.

What	Details / Evidence / Elaboration
Introduction	<p>We are Antony Kitchener and Simin Littschwager, residents of Makererua Street, one of the areas in Ngaio that are potentially affected by the push for enabling six-plus-storey development in the outer suburbs along the Johnsonville rail line.</p> <p>We have lived in Wellington for almost 13 years. We lived in rental accommodation in Brooklyn for the first ten years. Three years ago we bought our first home here, a (modestly sized) bungalow in Ngaio for a not so modestly sized amount of money. We moved to Ngaio due to a combination of necessity and personal preference: On the one hand, we would have preferred to live much closer to town, ideally within a reasonable walking and easy cycling distance to the amenities of the central city. We were priced out of the suburbs that would have met those criteria, at least for a property that would have met our non-negotiable criteria, such as a garden. On the other hand, we fell in love with Ngaio's incredibly green character, its abundance of suburban trees and birdlife. This felt like a trade-off worthwhile compared to the more densely populated suburbs that we would have otherwise preferred.</p> <p>We understand, and support in principle, the need for increased density in urban areas and also, crucially, the need for affordable spaces that allow people to feel at home in this city (rather than merely being housed). However, we do not support the scale of intensification that would be enabled by declaring the Johnsonville rail line as rapid transit and allowing six storey buildings or higher to be built within 15-minute walking catchments of its stations. Previous hearing streams have already made arguments for and against declaring this railway to be rapid transit, and we firmly agree with all arguments against it. But the points we wish to raise in this part of the consultation is that, by focussing on the railway line in isolation, what has been neglected is the bigger picture of the potential detrimental and unfair impacts it would have on the smaller Western suburbs along the Johnsonville railway line, specifically Crofton Downs, Ngaio and Khandallah. The resulting loss in amenity would affect both the current and the future residents of these suburbs. In this submission we mainly focus on Ngaio as this is the suburb we know best, but there are similarities that apply to all suburbs and we highlight those as we see fit.</p>
<p>Point 1  <b>Submission point 199.7 -</b>  Part 3 / Residential Zones /</p>	<p>A key piece of documentation that we urge the panel to consider is the original draft spatial plan that was released to the community for consultation in 2020, along with research (the BECA Medium Density Outer Suburb Assessment and Evaluation report March 2020) commissioned by the Wellington City</p>

General point on Residential Zones / General point on Residential Zones

*Supports densification when it is "done well" and fairly distributed across the entire city.*

*Seeks that densification is distributed across the entire city and that six-storey buildings are not concentrated in Crofton Downs, Ngaio, and Khandallah. [Inferred decision requested].*

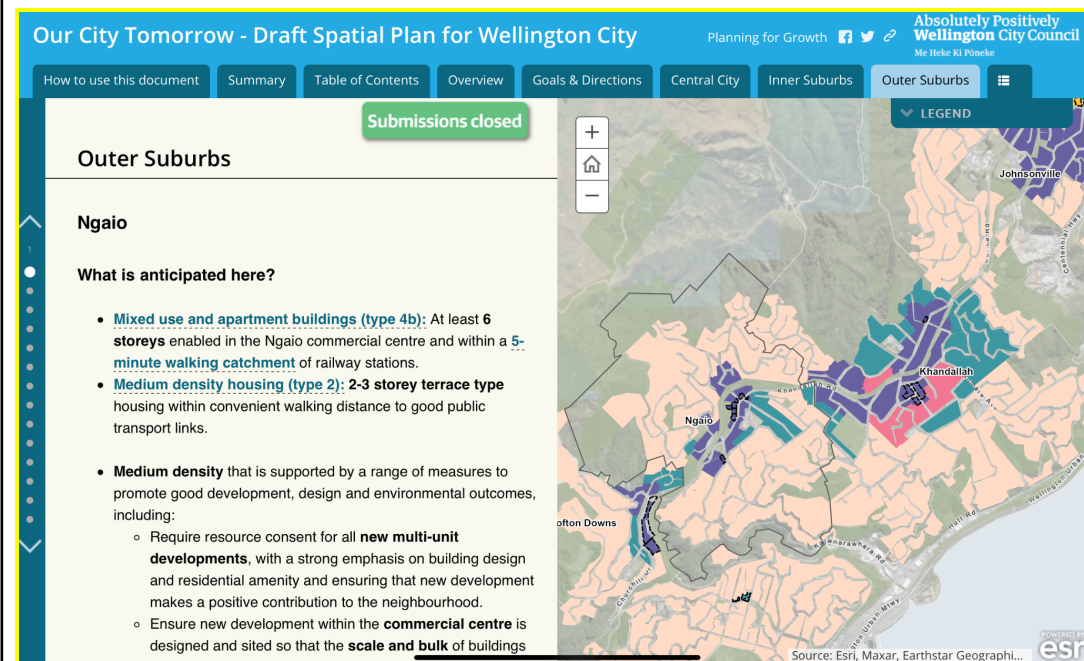
AND

Point 2

**Submission point 199.8 - Part 3 / Residential Zones / General point on Residential Zones / General point on Residential Zones**

Council to support the development of the original draft spatial plan.

In the [draft spatial plan from 2020](#), proposed areas for densification were evenly distributed across all outer suburbs. The draft plan generally proposed to enable up to six-storeys in a narrowly confined area around a local or neighbourhood centre, with decreasing building heights moving outwards from the urban centres, as is often seen in European cities and towns. Below is a screenshot of the original draft spatial plan and what was envisioned for the three [Outer Western suburbs of Crofton Downs, Ngaio, and Khandallah](#) (the purple indicates type 4b = at least up to 6 storeys; the teal indicates medium density type 2 = 2-3 storeys; pink indicates type 3-4 storey apartments; the beige indicates type 1 = 1-2 storeys detached/ semi-detached infill housing).



The adopted spatial plan, however, looks strikingly different. The areas in which at least six-storey buildings would be enabled in these suburbs have drastically increased.

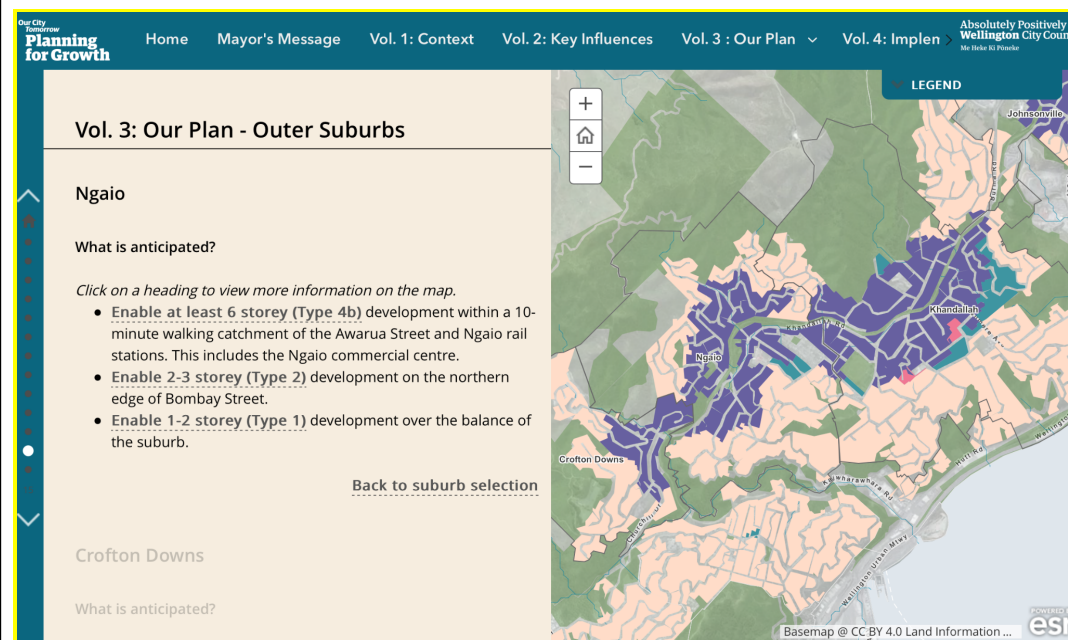
*Considers that the likes of Ngaio and Khandallah could benefit from some degree of densification to provide more local amenities and socio-cultural facilities, but this needs to be designed and executed well with constraint or consideration for the impacts on the community. Not specified.*

AND

Point 4

**Submission point 199.10 -**  
Part 3 / Residential Zones /  
Medium Density Residential  
Zone / General MRZ

*Considers that it is not fair nor reasonable that the outer northern suburbs deal with the brunt of intensification, while*



The below screenshot from the adopted spatial plan shows the disparity in the fair distribution of high density residential zones across the Wellington Outer suburbs (HD 6+ stories shown in purple). As indicated by the large areas of purple, the Outer Western suburbs of Crofton Downs, Ngaio and Khandallah, are suddenly proposed to accommodate a much higher density than any of the other outer suburbs (i.e. Brooklyn, Karori, Island Bay, or Kelburn).

*the inner suburbs that are close walking distance to the CBD or on the proposed light-rail route, appear not to be included in the six-plus storey building densification plans. This will increase the value of the already costly inner suburbs while the comparably more affordable outer suburbs will decrease in value. Seeks that Ngaio and Khandallah should not be expected to accommodate the construction of sixstorey residential buildings to ease the housing affordability crisis but not other Wellington suburbs which are within walking distance of the central city.*

The screenshot shows the 'Vol. 3: Our Plan - Outer Suburbs' section of the Wellington City Council website. The page is titled 'Vol. 3: Our Plan - Outer Suburbs' and features a navigation menu at the top with options like 'Home', 'Mayor's Message', and 'Vol. 1: Context'. The main content area is divided into sections for different suburbs, each with a heading 'What is anticipated?' and a list of planned developments. A map on the right side of the page shows the geographical layout of these suburbs, with labels for Churton, Johnsonville, Newlands, Ngaio, Khandallah, Crofton Downs, Karori, Brooklyn, Island Bay, Lyall Bay, Hataitai, Miramar, and Kilbirnie. The map is powered by Esri and includes a legend and navigation controls.

### **What has changed?**

The sole driving factor for this discrepancy between the draft and the adopted spatial plan, as far as these suburbs are concerned, are the NPS-UD and the existence of the Johnsonville Railway line, and the hotly debated question of whether or not this single track line, which leads through a narrow gorge and is prone to slips and erosion, could possibly be classified as rapid transit, and the subsequent question of whether or not high density in the form of 'at-least six storey' buildings and higher should be enabled within 15-minute walking catchments of the train stations. However, nothing else in these suburbs has changed from the [Beca medium density outer suburb assessments](#): the narrow, hilly, windy streets are the same. The small retail strip of mainly takeaway shops, a pharmacy, a single cafe, a hairdresser, a boutique childrens' clothes shop, and a dairy, is the same; and it still sits on only one side of the main road, opposite residential buildings. The green character of these suburbs, the high number of mature trees, and the resulting biodiversity the greenery enables, are still the same. It is also important to note that what has changed is merely how this railway line *may be defined*; there have been no

improvements to the railway line itself, and the railway line had existed prior to the NPS-UD but was not considered to be a significant enough enabling factor for higher density in these suburbs. And crucially, the current community of residents in these suburbs have not advocated for increased density during the consultation period.

The NPS-UD does not stipulate clear-enough definition criteria that unequivocally designate the Johnsonville railway line as rapid transit. (See, for instance, this article: <https://www.stuff.co.nz/national/123600054/sixstorey-building-developments-in-wellington-could-hinge-on-definition-of-rapid-transit> ). There is also the provision to introduce qualifying matters based on reasons why a certain area is not suited for high densification. This gives decision makers the chance to take a holistic approach and consider the suitability (or lack thereof) of these suburbs. From a holistic perspective, the following points support our argument that the outer Western suburbs of Crofton Downs, Ngaio and Khandallah are *not* suited to the high density that would be enabled by 15-minute walking catchments around the train stations of the Johnsonville railway line. Notably, many of points have been raised in an extensive density mapping process commissioned by WCC in preparation for the proposed draft spatial plan, described as follows:

*“All density categories, locations and types for Ngaio were based on analysis of GIS maps, site observations and multi-disciplinary professional collaboration in a two day workshop. [...] One of the important considerations for Ngaio that influenced the final proposed density mapping was the green gateway landscape, heritage architecture and the severance of the mid valley railway line.”*

The following quotes, taken from the [Beca Western Suburbs Evaluation report from March 2020](#), summarise some of Ngaio’s key features that were highlighted as a result of the density mapping, which looked at landscape, urban design, architecture, heritage, character, amenities, public transport). For a detailed assessment of Ngaio and the other Western suburbs, please see the original report.

*“Ngaio is a small suburb located approximately 7km north of the city centre, with relatively easy access to the city centre via rail and cycle along Ngaio Gorge Road. The streets are sloped and buffered by mature planting, they wind around the valley with no visual cues to the centres. There are suburb centres in Ngaio, both small in scale and characterised by a line of shops along Ottawa Road. The main centre sits within the lowest point in the topography and is prone to flooding. Ngaio is well known for its collection of railway cottages of heritage value.” (P. 65)*

*“Ngaio’s quiet and intensely green character belies its location as a 15-minute train ride from the Central City. Mature native and exotic trees, within both the public and private realm, give this suburb its notably leafy structure and evoke its history of timber industry.”(P.67)*

*“The Ngaio community has a reasonable range of public transport options, but a limited range of retail and community infrastructure to support medium density. Ngaio’s low infrastructure investment requirements makes some medium density possible. These factors support **limited** medium density development in Ngaio.” (P. 74, emphasis added). - note that medium category 2 density here is defined as up to 3 storeys.*

*“There are suburb centres in Ngaio offering small scale convenience based retail for day to day needs. The larger is located on the Ottawa Road within a few minutes walk to the Awarua Street rail station and the smaller on Crofton Road within a few minutes of Ngaio rail station. Wayfinding and access to the rail stations from the suburb centres is difficult, particularly Awarua Street station which can only be accessed by foot. Both centres are strip style centres with a singular retail edge; the shops are located on one side of the street and residential on the other. There are several community facilities such as the library, community centre, park and schools located nearby. Both centres are located along arterial roads with high movement function and limited pedestrian cross movement. The windy streets and blind corners limit the ease of access to and around the centres.” (66)*

*“It was acknowledged that the existing road networks on the upper slopes of Ngaio are narrow and would not support medium density without a possible negative impact on the road network. Hence the medium Category 2 density is limited to the areas that are walkable to the rail stations and Ottawa Road. (P.73) - note that medium category 2 density here is defined as up to 3 storeys.*

The NPS-UD already enables higher degree of density than what the initial draft spatial plan proposed for the Western outer suburbs of Crofton Downs, Ngaio, and Khandallah, through allowing up to three dwellings, three storeys high, on a single section, without requiring resource consent. Enabling additional high density through 6-storey buildings and higher within a 15 minute walking catchment of the railway stations risks pushing these suburbs beyond what the existing infrastructure can reasonably and fairly accommodate. This is not good urban design – this is a stopgap measure that will have negative impacts on the current and future residents of these suburbs.

In addition, the [“Retail and Market Assessment” for Wellington City Council by Colliers International and](#)

[Sense Partners \(2022\)](#) - which makes specific recommendations about the District Plan – states with regards to upzoning, considering the impacts of population growth on commercial activity: *“We suggest Karori, Miramar, Tawa, Khandallah, Kelburn, Linden and Newlands should be town centres. The low scores we obtain for the other centres suggest Haitatai, Brooklyn, Crofton Downs and Churton Park are better suited as Local centres. We have insufficient data on Ngaio or Berhampore to make a recommendation. We suggest these centres remain neighbourhood zones.”* (113). Footnote 3 states: *“Moreover, geographic constraints and the time it takes to walk across each centre could be used as input variables or constraints on any assessment.”*

Allowing six storey buildings and higher along the stations on the Johnsonville rail line, specifically in Ngaio, Crofton Downs and Khandallah, contradicts these recommendations. The negative consequences are potentially unattractive neighbourhood centres that do not result in walkable and vibrant local neighbourhood centres because of the lack of land and premises that allow commercial development. Rather, they will result in increased residential density without any of the positive community amenities that are commonly associated with medium to high density living.

The Colliers report also states that *“Expanding the city centre zone to Thorndon is testing, Adelaide Road is more promising”* (p.7-8; 91ff); *“The area’s location at the southern end of the CBD, close to the inner-city beaches and benefiting from easy access to retail, hospitality and entertainment amenities, makes the area a desirable residential location”* (p. 100). These statements imply that the vibrant commercial parts of the city are predicted to develop south, further away from the central railway station and thus further away from the Western suburbs, be that by car, bike, public transport, walking, or whatever mode of transport people prefer.

On the note of balancing density throughout the city, the green and biodiverse character of the Outer Western suburbs is worthy of at least the same degree of character protection that some other suburbs have been granted due to their high rate of heritage buildings. It is unfair that the ‘character’ of wealthy suburbs like Kelburn or Mt Victoria is given priority over the character of others, with a clear bias towards historical buildings and architecture being the only character-defining criteria. A building can be lost and rebuilt within a few years; it may look different, but it still fulfils the same function. A mature tree, by comparison, takes the time to grow that it takes - decades if not centuries to reach maturity. Once it is lost, it is lost for the foreseeable future. Considering an area’s existing biodiversity and green nature would also be much more aligned with the [draft spatial plan](#)’s explicit goal to be resilient and greener (*“Wellington is sustainable and its natural environment protected, enhanced and integrated into the*



*natural environment*”). In light of climate change and its impacts, it is shortsighted to sacrifice mature urban trees and the biodiversity they support. The Beca Outer Suburb assessment makes it clear that in Ngaio and Khandallah specifically, *“there are a large number of mature trees on private property (especially in Ngaio and Khandallah) that significantly contribute to the green image of both the community and to Wellington in general. Due to the lack of street trees in these neighbourhoods these private large mature trees, especially at the front of properties, have a significant role in providing the positive green image on the public realm and streetscape.”* (9; quote from [Introduction section](#)).

Mature trees, native and non-native alike, play an important role in supporting biodiversity and native birds through providing shelter and food sources. Birdsong contributes enormously to the green and biodiverse character of these suburbs. There are a number of mature Rimu, Nīkau, Kauri, Kahikatea, Puketa, Tī Kōuka (Cabbage trees) on private properties in our neighbourhood; there are also mature non-native trees that equally attract and feed an abundance of native wildlife. In our own garden and those in the adjacent properties, Tūi, Piwakawaka (Fantails), Kākā, Riroriro (warblers), Ruru (Moreporks), Korimako (Bellbirds) thrive and can often be seen foraging for food on various trees, including non-native fruit and other trees. Occasional avian visitors further include Kākāriki, Pipiwhararoa (Shining Cuckoo), Kotare (Kingfishers).

Not many other Wellington suburbs are characterised by this abundance of birdlife, and there is a great risk that Wellington will decrease in biodiversity if mature trees are not protected, and green corridors are broken up and replaced with high density housing. Residential design guides in the district plan must not only give protection to trees on street frontages, but also in backyards – especially in biodiverse suburbs like Ngaio, Crofton Downs, and Khandallah, where a lot of infill housing exists and backyards are an important amenity. There must be a mandate for developers to comply with minimum design standards that protect mature trees for all developments, rather than being a ‘nice-to-have’ or being exempted where the standard ‘does not apply’. Trees also help mitigate some of the effects of climate change related events, such as flooding, heat, and slips, which are predicted to increase in coming decades. For recent articles on the loss of urban green space, densification, and climate change resilience, please see the following:

<https://theconversation.com/were-building-harder-hotter-cities-its-vital-we-protect-and-grow-urban-green-spaces-new-report-201753>

Another point to consider is that it is naive to assume that just because there is public transport, people will use it. Only those for whom it is practical or the only option, will use it. According to this recent analysis from the [Wellington Transport Analytics](#) Unit, 48% of people who live within a 10-minute walking

catchment of any of the Johnsonville railway stations commute to the CBD by car; 29% by train; 18% by bus; and 6% walk/cycle (p.16; see also table below which is taken from this page).

**Table 9: Mode share for commute to Wellington CBD – people within 10-minute walking catchment of station**

Stations	Car	Rail	bus	walk/cycle	Total	Car %	Rail %	bus %	walk/cycle %	Total
Johnsonville Station	192	81	129	9	412	47%	20%	31%	2%	100%
Raroa Station	78	53	20	5	156	50%	34%	13%	3%	100%
Khandallah Station	143	72	33	16	263	54%	27%	12%	6%	100%
Box Hill Station	71	29	22	9	131	54%	22%	17%	7%	100%
Awarua Street Station	114	107	27	22	271	42%	40%	10%	8%	100%
Simla Crescent Station	101	61	27	10	200	51%	30%	14%	5%	100%
Ngaio Station	100	68	46	23	236	42%	29%	19%	10%	100%
Crofton Downs Station	54	38	6	7	105	51%	36%	6%	7%	100%
Total	853	509	311	101	1,774	48%	29%	18%	6%	100%

What is also interesting to note is that the train patronage significantly drops on the weekends, suggesting that it is not commonly used for leisure trips into the CBD - note that the two weekend-days are summarised in single column:

**Table 1: Daily boarding inbound and outbound by time of day, weekday and weekend**

Station	Weekday boarding inbound					Weekend	Weekday boarding outbound					Weekend
	AM peak (IB)	Inter Peak (IB)	PM peak (IB)	Off Peak (IB)	Total		AM peak (OB)	Inter Peak (OB)	PM peak (OB)	Off Peak (OB)	Total	
Johnsonville	199	164	74	97	534	121	0	0	0	0	0	0
Raroa	160	162	34	35	391	28	33	147	19	23	222	16
Khandallah	171	50	24	38	283	36	29	32	22	23	107	18
Box Hill	78	41	15	25	159	26	35	27	15	16	94	15
Simla Crescent	148	54	19	34	255	31	70	30	15	20	135	16
Awarua Street	129	48	17	34	229	30	51	32	14	17	115	18
Ngaio	164	71	20	51	306	56	80	35	22	22	159	21
Crofton Downs	166	59	19	39	283	38	50	39	22	24	136	23
Wellington	0	0	0	0	0	0	115	423	725	337	1601	310
<b>Total</b>	<b>1,215</b>	<b>649</b>	<b>221</b>	<b>353</b>	<b>2,439</b>	<b>367</b>	<b>464</b>	<b>766</b>	<b>855</b>	<b>484</b>	<b>2,569</b>	<b>437</b>

The report also notes that

- “Raroa and Ngaio stations have the highest proportion accessing the station by motor vehicle (on average 42%) – these stations have 45 & 49 Park & Ride spaces each” (p. 21)
- “Approximately 29% of those driving to Raroa and 22% driving to Ngaio Station live within 1 km of station” (p. 21)
- “The analysis found that, 60% of those using a motor vehicle to access the Johnsonville line were living less than 1 km or within a 10 min walk from a station, highlighting the opportunity to influence behaviour and encourage modal shift from car to walk/cycle access.” (p. 19)

If these patterns were to continue in a high density environment in these outer suburbs, there is a big risk of increased congestion on narrow windy roads, which in turn might even disincentivise active modes of transport such as cycling and walking, as it makes roads an unpleasant and hostile place to travel in. It also poses potential problems from an emergency management and resilience point of view.

As highlighted in his article, [Rapid transit won't unclog Auckland roads, congestion charge needed too - study](#), the mere presence of rapid or public transit is not enough - disincentives to use cars are also needed. It is unclear, however, what such mechanisms might look like in the Outer Western suburbs like Crofton Downs, Ngaio, Khandallah - if a congestion charge were to be introduced in these Wellington

suburbs as the only Wellington city suburbs to have such a charge, this is inequitable. If a congestion charge were to be introduced on the motorways leading into the city (to disincentivise people commuting from Kāpiti or the Hutt Valley via car), then it could even lead to increased congestion on the suburban roads into the city, as some people will likely take a detour to avoid charges.

The following is a summary of example situations where the railway line is not practical for Ngaio residents to use, based on our own experience and that of friends, neighbours, colleagues.

- The railway line is not well integrated with other suburbs, Wellington attractions, and the Wellington transport network. It transports people only to and from the central railway station, which is a fare zone 3 trip by default. Any transfer to a bus requires additional walking as well as arrive-and-wait time, and at present also means extra cost. This means that many areas will continue to be quicker and more economical to reach via private transport. Many key attractions – like Zealandia, the Botanical Gardens, the Zoo, the South Coast, Otari Wilton Bush – are also not easily reachable via public transport from Crofton Downs, Ngaio, Khandallah.
- Visiting friends in Karori, Brooklyn, Island Bay, Newtown, Miramar, Petone, or having friends from these suburbs over at our place, is also much more economical with a car. We have friends who live in Karori and Miramar respectively and who are not able to drive in their own car; they do not like to visit us because it is so hard to reach with public transport. Another pair of friends from Newtown takes a cab when we invite them so that they can drink alcohol.
- Two of Wellington's biggest employers – the hospital and Victoria University's main campus and Te Aro campus are not easily reachable with the train, nor within easy walking distance from the train station. As an example, for one of us, commuting via train and bus to an inner city workplace in Mt Cook would result in a 70 minute trip (one way) for what is a 9km actual travel distance; it takes 20-25 minutes by car, even during peak times; it takes 30-45 minutes by bicycle (e-bike or road bike). As a further example, a colleague who lives 3 minutes away from the train station in Johnsonville, always commutes via car instead of train because they need to drop off/ pick up their children from school on the way.
- There is no supermarket in Ngaio. There is neither space to build one, nor is there commercial viability, given the proximity of a large Countdown in Crofton Downs and a smaller New World in Khandallah. It takes 25 minutes from our house to walk to either. It takes less than 5 minutes by car.
- The harbour market – one of the most reliably affordable options to buy cheap fresh fruit vegetables – is a 20-25 minute walk from Wellington central station, and thus not a very practical option for weekly vegetable shopping where one would carry heavy bags. Including walk,

arrive-and-wait times, it would take us almost an hour one way, whereas with the car it takes us 15-20 minutes one way.

- Entertainment and culture amenities - like a variety of cinemas, theatres, concert venues, museums, galleries – are not within easy walking distance of the train station. It takes us 15-20 minutes to drive to the cinema in Petone or on Wigan Street or Kent Terrace, often including finding a parking space. By train and foot it would take us up to an hour if not longer, depending on the time of day.
- The implications are that many people will still continue to rely on private vehicles, especially in their private lives. A disproportionate amount of high density in the Outer Western suburbs will lead to increased congestion, and somewhat counterproductively, make alternative active modes of transport such as biking and walking, less attractive and safe on these narrow and hilly roads.

In addition, there are concerns as to where people may park, and how this affects emergency vehicle access and other emergency situations (e.g. evacuation). Just because the NPS-UD have removed the car parking requirement from development sites does not mean that people will no longer own cars. Crucially, without car parking facilities on private sites, cars will be parked on narrow streets, which would need to be well regulated and enforced in order to not pose significant risks for emergency scenarios where emergency vehicles such as fire trucks and ambulances need fast and unimpeded access to an address. In the small cul-de-sac that we live in (which falls just within the 10-15 minute walking catchment of the Ngaio train station), most of our neighbours have two cars, and at least one of these tends to be parked on the street, which is so narrow that cars can only park on one side. There have been occasions where cars have parked in our street in such a way that larger vehicles such as an SUV were unable to reach the turning area at the end of the cul-de-sac and had to manoeuvre in someone's driveway instead in order to leave the street. In the event of a fire emergency in our street on that day, the outcome could have been catastrophic.

Resilience in the face of potential bigger emergencies, such as wildfire spreading from the surrounding hills – which is not an impossible scenario, given that Wellington's wildfire risk is predicted to increase with climate change – is another concern: what if large numbers of people would have to evacuate? Another resilience related concern is the potential for the railway line failing, even just temporarily, due to slips – also not an impossible scenario, given Wellington's increasing number of slips in a changing climate and the railway line's precarious route through a steep and difficult-to-access gorge. How would the road network and infrastructure cope with a sudden influx of traffic in these scenarios? From a resilience point of view, too, it would thus make more sense to distribute increased density evenly and

fairly across the city. Disproportionate density in the Outer Western suburbs will lead to disproportionate congestion, make these areas less safe and undesirable to live in, and lead to increased emergency and resilience risks.

As far as travel modes and times are concerned, it is also important to consider that due to their location and distance from the central city, and the type of access routes, the Outer Western suburbs do not easily support a variety of transport modes, especially not when compared with some of the other so-called outer suburbs, such as Brooklyn, Kelburn, Mornington, or Vogeltown. The following walking time estimates have been created with the help of Google Maps estimates and clearly show that the Outer Western suburbs like Ngaio and Khandallah are inferior as far as walkability to the town centre is concerned:

<b>Suburb</b>	<b>Estimated Walking Time to Civic Square</b>	<b>Suburb</b>	<b>Estimated Walking Time to Civic Square</b>
Ngaio	1h19m (6.5km)	Kelburn	18m (2km)
Khandallah	1h19m (7.9km)	Hataitai	37m (3.7km)
Karori	58m (5.4km)	Miramar	1h17m (7km)
Brooklyn	30m (2.4km)	Mt Cook	20m (1.9km)
Aro Valley	18m (1.5km)	Newtown	40m (4.1km)
Mt Victoria	17m (1.6km)	Thorndon	21m (1.9km)

In addition, the walking route along Thorndon Quay, with its mixture of commercial and light industrial

outlets, and busy Hutt Road with its traffic, industrial outlets as well as a petrol station, is not necessarily pleasant. The walk up and down Ngaio Gorge Road may offer a green outlook; however, there too, traffic spoils the walking experience, it is a steep hill, and at night the walkway is poorly lit. Given the isolated and often deserted nature of all these routes combined, especially during the darker times of the year and late at night, these are routes where many people, especially women, will not feel safe walking alone.

The potential impact of unsuitably high density on the existing residents of suburbs that are characterised by their village-like nature and semi-rural feel also need to be considered. So far, no fair consultation with the affected communities in the Western Outer suburbs of Crofton Downs, Ngaio, Khandallah has been undertaken. Unlike many other Wellington suburbs, which as a result of community feedback had their degree of proposed density *reduced* during the consultation period for the spatial plan, the proposed and potentially drastic *increases* in density have not been the result of feedback from the existing residents of Crofton Downs, Ngaio, Khandallah. Nor have these changes, alongside opportunities for further feedback, been well-publicised and communicated to the affected residents and communities. As an example, we only learned from a Stuff article about a council meeting on 23 June 2022 that the Johnsonville railway line had been considered as rapid transit and what that would have meant in terms of high density in our neighbourhood. Crucially, in this council meeting, the councillors actually voted *against* the Johnsonville railway line as rapid transit. Subsequently, many people, whether they would have been shocked or surprised to learn about the rapid transit issue in the first place, would have understandably assumed that this decision could not be overturned yet again. The interactive map of the proposed district plan also currently shows the areas that may still be designated as high density – pending on the decision about the rapid transit status of the Johnsonville railway line and walking catchments – as a medium density zone in which building heights are restricted to 11 metres. There is no information about potential changes towards drastically higher density, giving people a false impression as far as density in their neighbourhood is concerned. See the screenshot below as an example:

Wellington City Proposed District Plan

Absolutely Positively Wellington City Council  
Me Heke Ki Pōneke

Search for an address...

Map Tools

Map Layers

- Zones
- Precincts
- Specific Controls
  - Active Frontages
  - Non-Residential Activity Frontage
  - Curtis Street Building Setback Controls
  - Height Control Areas
  - Horokivi Area
  - Lyall Bay Parade Frontage Control
  - Minimum Sunlight Access - Public Space
  - Old St Paul's - Adjoining Building Control
  - Queens Wharf Buildings
  - Spenmoor Street Area
  - Tapu Te Ranga Site
  - Verandah Controls
  - Waterfront Areas of Change
  - Waterfront Public Open Space
- Energy Infrastructure and

Legend

Help

We only found out that much higher density in the form of six storey plus buildings was still a real possibility by proactively enquiring with WCC, and that's also when we found out about the time window for submissions to the comment on the proposed district plan. For lay people, making submissions like this is not an easy and straightforward process. It is also a mentally draining and time-intensive activity outside of a day job. There are clearly power imbalances at play that do not favour communities but powerful lobby groups, business interests and profit driven property developers.



One of the pillars of density done well, according to this [Isthmus guide](#), is buy-in from, and collaboration with the local community (point 2). This has been neglected, as far as the Outer Western suburbs are concerned.

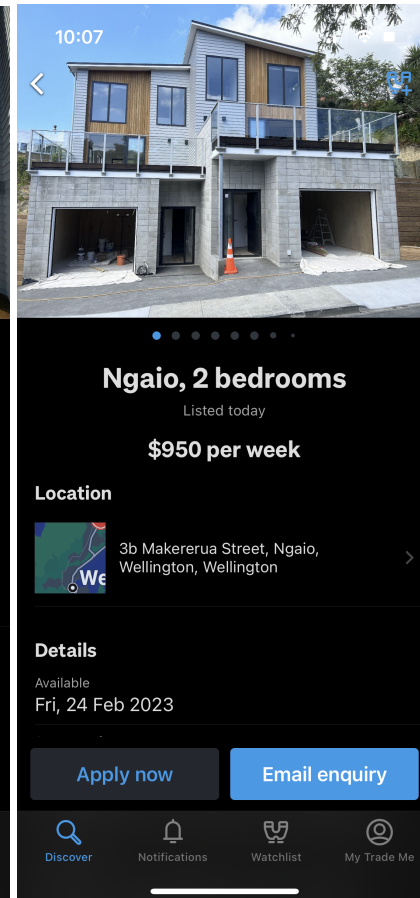
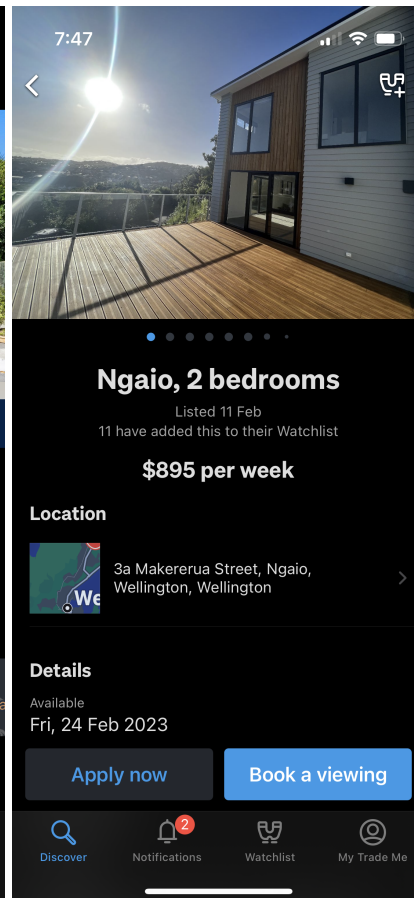
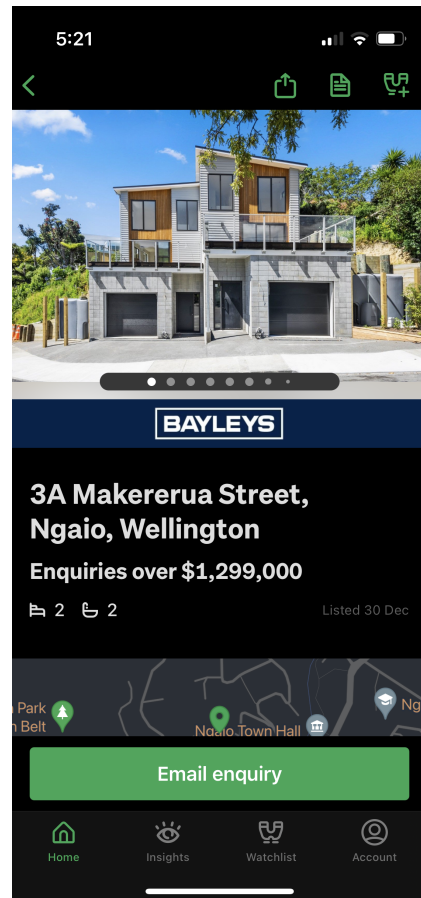
The way in which Isthmus recommends density is approached in Aotearoa New Zealand is also worth quoting at length. According to them, density

*“doesn’t have to involve really tall buildings and lots of hard surfaces. Density and overcrowding are not the same thing. Increased density can be green! It can be low rise, and it can be friendly. It can be safe, it can feel familiar, and you can still have privacy. [...] Low density living suits a lot of people and isn’t necessarily bad! It just gets bad when that’s all there is, and all there continues to be. When done well, higher densities can unlock improved health and wellbeing (yes, even in a pandemic), improved wealth (for both households and the city itself) and improved environmental outcomes. The trick to all this of course is those three words: when done well. In many of our smaller centres, the district plan isn’t geared to hold a high enough bar for this type of development. Council officers don’t have the experience, resource, or mechanisms through which to educate their local designers and developers (if it’s even their job to) or push back against applicants proposing development that would most certainly lead to poor outcomes for the future residents. In some places there’s easy, open land out on the edge that’s likely to see diggers before the city centre gets the attention it needs, and many don’t have the funds to pay for the high-quality public amenity that higher density living needs for it to be successful.”*

This supports the idea that more density isn’t automatically better, and there is a real concern that the current push for enabling high density in large areas of the village-like Outer Western suburbs at all cost and without holistic and place-based design considerations, without binding amenity provisions for density done well, and without fair community consultation will result in poor outcomes for everyone, current and future residents alike.

All these factors, in combination with the arguments that speak against declaring the Johnsonville railway line as rapid transit, must be taken into account, and altogether speak against the suitability of Ngaio and the other affected Outer Western suburbs as accommodating a disproportionate amount of high density. Concentrating high density in these suburbs alone through enabling buildings of at least six storey buildings within 15-minute walking catchments of the railway stations creates pockets of high density in areas where it is not suitable. If the Johnsonville railway line is declared to be rapid transit, then 5-minute walking catchments at most should be considered for high density; and the district plan needs to include sufficient qualifying matters to enable well-designed high and medium density rather than ad-hoc building

	<p>practice; and it needs to ensure that the green and biodiverse character of these suburbs is given sufficient protection from profit-driven property development.</p>	
<p>Point 3  <b>Submission point 199.9</b> -  Part 3 / Residential Zones /  General point on Residential  Zones / General point on  Residential Zones</p> <p><i>Considers that the housing crisis cannot be solved purely through increased supply alone. If new housing is not "affordable" and there are no controls on who can purchase all of this new housing supply, it is highly likely that a large percentage of new housing will be purchased by rent-seeking landlords, who will continue to push up rent costs. Seeks that the WCC stipulate a certain percentage of newly built dwellings to be classed as "affordable".</i></p>	<p>Increased density doesn't automatically translate into increased affordability. Developers have profit as their first priority. Take, for instance, the prestigious Victoria Lane apartments in Wellington, where <a href="#">3 bedroom apartments have been advertised for BEO 1,445,000 NZD</a>. As far as Ngaio is concerned, two recently completed 2 bedroom townhouses in our street were advertised for sale in late December 2022 / early January 2033 for 1,299,000 NZD. It appears that no buyer was found as the listing was soon turned into a for-rent advertisement, with asking rents of 895 NZD/week and 950 NZD/week respectively. This is far from affordable, and far above the median Ngaio rent of 550/week for a 2-bedroom house.</p>	



Another recent example of profit-driven property developers in the news was a townhouse development in Upper Hutt, where unsold townhouses were converted into AirBnB short term rentals, supporting the argument that developers have no primary interest in solving the housing shortage and creating thriving and vibrant urban communities:

<https://www.stuff.co.nz/business/property/131017798/williams-corporation-converts-unsold-townhouses-i>

	<p><a href="#">nto-airbnbs</a></p> <p>There is also the question of who will buy these new properties, and how this will improve affordability. We have anecdotal evidence of (wealthy) people whose main residence is in Karori yet who also have a ‘city pad’ on Dixon Street for the occasional night out or visiting friends and family; people whose main residence is in Lower Hutt yet who also have an apartment in the Wellington CBD to stay in during the week; people who live and work in Auckland yet find it practical to have an apartment in Wellington just in case travel there, which they occasionally rent out on a short term basis.</p> <p>If new density developments do not have affordability requirements, then it is not clear how the increase in supply alone will solve the housing crisis. Affordability requirements are needed as an effective control mechanism to prevent further property speculation and price bubbles.</p>
<p>Point 5</p> <p><b>Submission point 199.11 -</b> Part 3 / Residential Zones / High Density Residential Zone / General HRZ</p> <p><i>Considers that given the very real possibility of a developer building a six-storey high residential only one metre from the property boundary, the submitter asks how will WCC compensate neighbouring properties.</i></p> <p><i>Seeks that the Council clarifies how it will compensate</i></p>	<p>By increasing the theoretical area where developers can build, developers have disproportionate control over what suburbs look and feel like, and the kind of lifestyles they foster. However, the current and future residents and communities who have to live with the consequences of design decisions they have no say in, deserve greater consideration. There is a big risk that by theoretically enabling high density within 15-minute walking catchments of the railway stations in the semi-rural and village-like Western Outer suburbs, this will have a fracturing effect on communities, where people no longer trust their neighbours and live in perpetual fear that someone might sell to developers; that at any point in time they might lose amenities that are dear to them, amenities that are essential to their wellbeing and their sense of connectedness and belonging to their community; amenities like privacy, outlook, gardens that receive sunshine, houses that receive natural light and warmth through passive solar gain, peaceful suburban backyards, roofs that receive enough sun to make the investment into solar panels worthwhile, etc.</p> <p>Consider also the role that profit driven property development might play in exacerbating such inequities and reducing community cohesion, as evidenced by this example of developers pressuring residents into selling for a lower price than their house would have otherwise been valued at: <a href="https://www.stuff.co.nz/national/130732505/townhouse-builder-uses-prospect-of-social-housing-to-pressure-homeowners-into-selling">https://www.stuff.co.nz/national/130732505/townhouse-builder-uses-prospect-of-social-housing-to-pressure-homeowners-into-selling</a></p> <p>It is extremely naive to suggest that six-storey buildings and higher in a previously low density, single-story neighbourhood will not have a negative impact on the immediate neighbours’ sense of wellbeing. Ironically, the proposed district plan allows for the new development of so-called “Large Lot residential zones” (LLRZ) in, for example, Brooklyn/Happy Valley, relatively close to the inner city. These LLRZ are suitable “for lower density development on typically larger sites which are located on the</p>

*neighbouring properties of six-storey developments for the loss of light, privacy, increased noise, and investments that depend on sunshine hours.*

*periphery of the urban area. The zone provides a transition from the medium density residential zone to the rural zone. It allows people to live in a semi-urban area with an enhanced sense of privacy that is not always available within the residential areas.”* This reads like an apt description of Ngaio, Khandallah, Crofton Downs, and acknowledges that some people do, in fact, appreciate low density environments, gardens, and so on. And yet if residents of these suburbs dare to speak about their fears, they are quickly subject to personal attacks and labelled as anti-progressive “Nimbys”, without facts and fears objectively being addressed. It is all-too-easy to pit existing homeowners (which in reality are often people who have significant debt to pay off) against aspiring homeowners. Yes, there will be some long-term house owners who will gladly sell to a developer for a premium price to fund their retirement. But there will also be first home buyers who bought at the recent peak of the market, took on enormous amounts of debt, now face negative equity, and who may soon feel trapped in a place that they fear they cannot feel at home in and yet who are priced out of the medium and low density urban areas that they would rather live in. This, again, does not feel fair. It is therefore essential that there are plans and provisions to compensate affected residents who will experience unjust negative outcomes of high density developments and support them in having choices and alternative options; for example through requiring developers to pay a fair price and through considering some compensation for neighbouring properties who lose amenities, or whose flood risk increases as the result of reduced permeable surfaces, so that people have options and alternatives, rather than feel trapped and disenfranchised.