

**HEARING STREAM 2: RESIDENTIAL SPEAKING NOTES AND LINKS: JULIE PATRICIA WARD
(SUBMITTER 103) For hearing on 5 April 2023 at 3.40 pm**

Introductory comment: Khandallah is my area of interest and deep knowledge.

It is my sincere belief that incremental development can meet future housing needs in the Outer Suburbs Zones (OS) of Wellington City.

1. Strong Towns: <https://www.strongtowns.org/housing>
2. “There should be no substantial barrier that prevents a neighbourhood from evolving over time in response to local needs and for a local plan that allows for the next increment of development on every property by right.”
One simple rule in relation to housing: *“No neighbourhood should experience radical change, but no neighbourhood can be exempt from change.”*
3. The next increment for the OS is three storey buildings covering up to 50% of a site. This is precisely the change enabled by the MDRS.
4. MDRS does the heavy lifting in the OS and is sufficient to satisfy the NPS-UD requirements, particularly for Khandallah. Dr Helm has stated “projected population growth is not due to NPS-UD upzoning, but to the MDRS. (<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/01/submitter-evidence/submitter-evidence--tim-helm-for-wellingtons-character-charitable-trust--submitter-id-233--fs82.pdf> p.20)
5. Consistent with HBA p.65 (https://wrlc.org.nz/wp-content/uploads/2022/05/HBA-Chapt-2-WCC-with-Appendices_web.pdf) “Wellington City’s housing shortfall is expected to be more evident in stand-alone and terrace housing in the short and medium term. The long-term shortage is expected to be in terraced housing. Capacity under the Operative District Plan for apartments appears to be sufficient to meet projected 30-year demand.”
6. Mr Osborne of Property Economics has stated the “(i)ncrease of competitive residential development capacity has the very real potential of redirecting growth from more appropriate locations and (from) providing greater certainty for infrastructure provision.” <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/02/council-docs/rebuttal/statement-of-supplementary-planning-evidence-of-josh-patterson-on->

[behalf-of-wellington-city-council.pdf](#) at p.31) This is consistent with Dr Helm's evidence that development along JVL will not increase housing supply but rather displace it from locations with better transport connections and employment accessibility.

7. Remove Height Zone 2 (14 metres) from the MRZ. It is not required by the MDRS and MDRS at three storeys already enables population growth beyond transport capacity.

8. Next paragraphs set out reasons to prefer MRZ intensification of three storeys in the suburbs along the Johnsonville Line rather than HRZ intensification.

9. Transport connections are good but not great. There will be a tipping when congestion on roads and public transport will make travel to the CBD more difficult.

10. Johnsonville train capacity covered in Stream 1 and I point especially to Dr Helm's evidence for Stream 1 where he points concludes: *"No meaningful proportion of the travel demands of an expected 11,000 new residents by 2051 can be met by a service with current peak-hour spare capacity of at most 1,000 passengers."*

(<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/01/submitter-evidence/submitter-evidence--tim-helm-for-wellingtons-character-charitable-trust--submitter-id-233--fs82.pdf> p 20)

11. HBA at p.59 notes, notes topography creates corridor constraints for increasing road capacity. Corridor widening of Onslow Road and Ngaio Gorge Road to expand capacity is unrealistic. PWC and Sense Partners cost benefit analysis of the MDRS attributes 56% to 60% of the costs of the MDRS changes to additional congestion.

<https://environment.govt.nz/assets/publications/Cost-benefit-analysis-of-proposed-MDRS-Jan-22.pdf> District Plan should operate to minimise the congestion costs of MDRS and as Dr Helm has highlighted most of the 11,000 new residents along the Johnsonville Line are likely going to drive in the face of no other viable option.

12. Centres along the Johnsonville Line are neighbourhood centres. Dr Zamani conceded in his responses to the KO maps earlier this week that the centres along JVL are too small to support high density. The level of accessibility by existing or planned active or public transport to a range of commercial activities and community services (to which NPS-UD Policy 3(d)(i) applies) is somewhat limited and supports medium density as defined by the MDRS, namely three storeys.

13. Three Waters capacity is either unknown or where known, known to be insufficient to support densification in Khandallah. Refer Catchment 4 page 9 of 2021 Wellington Water Report (<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/plans-and-policies/a-to-z/spatial-plan/three-waters-assessment---growth-catchments-mahi-table-and-cost-estimates-march-2021.pdf>)
14. The WCC LTP provides no funding of water infrastructure in Khandallah in the first 10 years of the plan. Focussing development avoids large overspends across the city.
15. Given limited monetary and real resources for infrastructure, targeted investment is required but will be more difficult to achieve with scattered development. Hamilton City has just last week come face to face with this reality. <https://www.stuff.co.nz/waikato-times/news/300840726/the-city-where-new-housing-is-in-doubt-due-to-old-sewer-pipes>
16. **Setbacks:** Seek MRZ-S4 as drafted in Appendix A <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/02/appendices/appendix-a/appendix-a---medium-density-residential-zone.pdf> with an additional Assessment criteria where the standard is infringed as follows:

“3. The location and design of the building as it relates to the ability to access and maintain buildings without requiring access on an adjoining property. “
17. Apply the same wording as MRZ-S4 for HRZ-S4.
18. **Permeability:** Irrespective of where permeability is covered in the plan, I would seek a permeable area of at least 35% of all sites. The concerns of the Parliamentary Commissioner for the Environment <https://pce.parliament.nz/publications/are-we-building-harder-hotter-cities-the-vital-importance-of-urban-green-spaces/> around the loss of green space is timely and important. His concerns should be heeded.
19. **Pattern Zoning:** Consider whether there is a place for a set of pre-approved standardised designs for the MDZ for small scale developments to lower barriers to executing high-quality, incremental infill projects. Consistent design is what creates character which is why areas such as Tarikaka Street in Ngaio have heritage status. More information at <https://www.cnu.org/publicsquare/2020/05/12/pattern-zone-enables-quality-infill-development>