

**BEFORE INDEPENDENT HEARING COMMISSIONS
MAI I NGĀ KAIKOMIHANA MOTUHAKE**

UNDER

the Resource Management Act
1991 (“**RMA**”)

AND

IN THE MATTER OF

submissions on Hearing Stream 1:
Strategic Direction of the Proposed
Wellington City District Plan

**STATEMENT OF EVIDENCE OF BENJAMIN PHILLIP WAUCHOP ON
BEHALF OF TE TŪĀPAPA KURA KĀINGA - MINISTRY OF HOUSING AND
URBAN DEVELOPMENT**

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Introduction

1. My full name is Benjamin Phillip Wauchop.
2. I am a Principal Policy Advisor with Te Tūāpapa Kura Kāinga – Ministry of Housing and Urban Development (“**HUD**”). I have been in that role since January 2019.
3. Prior to joining HUD, I was a Principal Advisor – Service Design Policy, Market Services with the Ministry of Business, Innovation and Employment (“**MBIE**”). I worked at MBIE for five years in a number of policy roles, before I took up employment with HUD.
4. I have a Bachelor of Arts (First Class Hons) in International Politics and a Graduate Diploma in Commerce from Te Herenga Waka – Victoria University of Wellington.
5. I was directly involved with the preparation of HUD’s submissions on the various plan changes, variations and other district plan processes that have commenced in response to the passage of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**Act**”) and the requirement for district councils to give effect to the National Policy Statement on Urban Development 2020 through those processes.
6. I am authorised to give this evidence on behalf of HUD.

An introduction to HUD

7. HUD leads the New Zealand Government’s housing and urban development work programme. It is responsible for strategy, policy, funding, monitoring and regulation of New Zealand’s housing and urban development system. As set out in its submission, HUD is working to:
 - (a) address homelessness;
 - (b) increase public and private housing supply;
 - (c) modernise rental laws and rental standards;
 - (d) increase access to affordable housing, for people to rent and buy; and
 - (e) support quality urban development and thriving communities.

8. HUD has a particular interest in the Proposed District Plan process, stemming from its co-lead role in developing the National Policy Statement on Urban Development (“**NPS-UD**”) and the Act and overseeing their implementation.
9. As set out in HUD’s submission on the Proposed District Plan, the NPS-UD aims to ensure councils better plan for growth and remove overly restrictive barriers to development to allow growth in locations that have good access to services, public transport networks and infrastructure. The NPS-UD intensification policies require councils to enable greater heights and densities in areas that are well-suited to growth, such as in and around urban centres and rapid transit stops.
10. HUD is also responsible for the Government Policy Statement on Housing and Urban Development 2021 (“**GPS-HUD**”). The [GPS-HUD](#) sets a direction for housing and urban development in New Zealand. Its overarching vision is that everyone in New Zealand lives in a home and a community that meets their needs and aspirations. The GPS-HUD sets out four main outcomes:
 - (a) Thriving and resilient communities – the places where people live are accessible and connected to employment, education, social and cultural opportunities. They grow and change within urban limits, support our culture and heritage and are resilient.
 - (b) Wellbeing through housing – everyone lives in a home, whether rented or owned, that is warm, dry, safe, stable and affordable, with access to the support they need to live healthy, successful lives.
 - (c) Māori housing through partnership – Māori and the Crown work together in partnership so all whānau have safe, healthy, affordable and stable homes. Māori housing solutions are led by Māori and are delivered locally. Māori can use their own assets and whenua Māori to invest in and support housing solutions.
 - (d) An adaptive and responsive system – land-use change, infrastructure and housing supply is responsive to demand, well-planned and regulated.

Other Government policy initiatives that are relevant to this hearing

The First Emissions Reduction Plan (“ERP”)

11. There are strong links between the requirements placed on local authorities under the NPS-UD and the ERP. The ERP contains strategies, policies and actions for achieving New Zealand’s first emissions budget and contributing to global efforts to limit global temperature rise to 1.5°C above pre-industrial levels. It emphasises how our planning system and investment in infrastructure can reduce

emissions, build resilience and improve wellbeing. The NPS-UD is a key initiative under the plan as it includes emissions-reduction objectives and policies that local authorities must give effect to, including the intensification policies.

Scope of evidence

12. The purpose of my evidence is to address the following points that have been allocated to this hearing stream:
- (a) the classification of rapid transit services and stops under the NPS-UD, and the Johnsonville Rail Line; and
 - (b) the size of walking catchments required to implement Policy 3(c) of the NPS-UD, particularly in relation to the walkable catchment from the City Centre Zone.

The benefits of intensification

13. Central to both of those issues are the benefits of intensification (particularly in well-connected areas). This is a key focus of HUD's submission, and arises out of its co-lead role in developing the NPS-UD and the Act.¹ These include:
- (a) Social benefits, resulting from greater availability of a wide range of housing typologies in areas that are close to jobs and services. This can slow or reverse the transfer of wealth from future homeowners and renters to current property owners in areas with heavy restrictions.
 - (b) Economic benefits, resulting from greater productivity. Agglomeration economies drive productivity growth in areas where higher numbers of firms and people are located near one another, as a result of improved matching between employers and employees and higher levels of innovation (due to 'knowledge spillovers').
 - (c) More efficient use of infrastructure, as infrastructure costs are lower, on average, for medium density developments and developments in inner-city areas.
 - (d) Environmental benefits relative to development further from the centre of cities. In particular, intensification is a key mechanism for reducing carbon emissions, enabling shorter commute times and efficient use of infrastructure, while continuing to meet housing and urban development needs.

¹ The costs and benefits of urban development, 2019, MRCagney: <https://environment.govt.nz/publications/the-costs-and-benefits-of-urban-development/>; The cost benefit analysis for the National Policy Statement on Urban Development, 2019: <https://environment.govt.nz/assets/Publications/Files/NPS-UD-CBA-final.pdf>; The cost benefit analysis for the Medium Density Residential Standards: <https://environment.govt.nz/assets/publications/Cost-benefit-analysis-of-proposed-MDRS-Jan-22.pdf>

Rapid transit services – HUD’s submission

14. The notified version of the Proposed District Plan did not identify the Johnsonville Line as rapid transit, resulting in a reduction in the amount of enabled capacity around stops along that line. HUD considers that the original assessment by Council officers, which found the line to meet the definition of rapid transit, is convincing. As officers noted in their report of 23 June 2022 to the Wellington City Council Planning and Environment Committee, the line has been identified as rapid transit in:
- (a) the Wellington Regional Land Transport Plan (RLTP);
 - (b) the Wellington Regional Public Transport Plan; and
 - (c) the Wellington Regional Growth Framework.
15. Identifying this line as rapid transit means that much more development would be enabled in locations that have relatively frequent, low-emissions access to the centre city. HUD requests the Johnsonville line be identified as rapid transit and the zoning around the relevant stops adjusted accordingly.
16. The HUD submission sought that the Johnsonville Line be included within the definition of rapid transit services, which would in turn enable more intensive development around stops along the route consistent with the policy direction in the NPS-UD.

Rapid transit services – section 42A report and supporting evidence

17. In preparing my evidence, I have been provided with a copy of the section 42A report and the supporting evidence of Wellington City Council’s technical expert witnesses.
18. I note that the report writer at paragraph 201 confirms that, in their assessment, the Johnsonville Line fits within the NPS-UD’s definition of a rapid transit service, consistent with the interpretations of “rapid transit” provided by other councils within the Wellington region, national guidance,² and the Wellington Regional Land Transport Plan.

² [Ministry for the Environment guidance](#) cites “train stations on the commuter rail services in Wellington and Auckland” as examples of rapid transit, and Waka Kotahi’s [One Network Framework Movement and Place Classification \(ONF\)](#) defines all metro rail corridors, regardless of current service frequency, as PT1, or strategically significant corridors where rapid transit services are operated. While this document has subsequently been updated to classify the Johnsonville Line as PT4, I note Mr Wharton’s rebuttal evidence, as well as Mr Georgeson’s evidence for Stride Property, which argues that the Line should still be classified as PT1.

Rapid transit services – HUD’s position

19. HUD supports this recommendation in the section 42A report.
20. From HUD’s perspective, classifying the Johnsonville Line as rapid transit, and increasing the permitted building heights and densities within a walkable catchment, better aligns with the objectives of the NPS-UD. House prices in the suburbs along the Johnsonville Line relative to the rest of the Wellington region indicate strong demand for housing in Crofton Downs, Ngaio, Khandallah and Johnsonville. These suburbs are well serviced by bus routes as well as rail, and the section 42A report identifies a range of services that are easily accessible from each station, which would support more intensive development as is enabled under the NPS-UD in these locations.
21. HUD understands that work is underway to futureproof the Johnsonville Line, by upgrading infrastructure and increasing resilience against the effects of climate change. This includes replacing wooden mass with steel poles, renewing the traction power overhead line systems, renewing sleepers in all seven tunnels along the route, and stabilising the slopes above and below the track through the Ngaio Gorge.
22. The section 42A report also identifies opportunities to increase the route’s capacity to keep pace with population growth, by adding carriages in peak times and adding a passing bay. In the event of higher-than-expected population growth in the suburbs along the Johnsonville Line, Metlink anticipates that this can also be supported by bus routes in the area, which complement train services.
23. Enabling greater intensification around stops on the Johnsonville Line will bring the benefits of intensification outlined above. It also supports the aims of the First Emissions Reduction Plan, by allowing more people to live within a walkable catchment of frequent and reliable public transport. This in turn decreases transport emissions, as fewer people need to rely on private vehicles.
24. HUD therefore supports the inclusion of the Johnsonville Line within the definition of rapid transit services, as proposed by the section 42A report writer.

Size of walkable catchments – HUD’s submission

25. The walkable catchment from the City Centre Zone was reduced in size from 15 minutes under the draft District Plan to 10 minutes in the notified Proposed District Plan. It has been suggested by Wellington City Council in the section 32 material supporting the notified Proposed District Plan that this was justified as there will still be sufficient development capacity overall to cater for the needs of a growing city, without extending the ambit of policies under the NPS-UD.

26. However, from HUD's perspective, the primary impact of this change will be to shift development to areas less well-suited to it – requiring longer commute times and making it more likely that people will drive to the central city. It is also unclear why this catchment should be reduced, especially when there are few potential benefits to restricting development in this area.
27. In its submission, HUD requested that the high density zoning around the city centre be amended to cover *at least* the area within a 15 minute walkable catchment (rather than the current 10 minute catchment).

Size of walkable catchments – section 42A report and supporting evidence

28. I note the section 42A report writer agrees with HUD's submission at paragraph 360 of their report to extend the walkable catchment to a maximum of 15 minutes from the edge of the City Centre Zone.

Size of walkable catchments – HUD's position

29. Again, HUD supports the recommendation in the section 42A report. Adopting the recommendation will help realise the benefits of intensification, outlined above.
30. As the section 42A report states, the proportion of people who walk to work and education from the suburbs around the City Centre Zone is very high compared to the New Zealand average. As part of its evaluation report for its Plan Change 78, Auckland Council produced a relevant literature review of literature relating to determining the size of walkable catchments.³ This literature shows that Wellington has the highest levels of walking across the regions of New Zealand.⁴ The draft Pedestrian Network Guidance (2021) prepared by Waka Kotahi provided data that showed that half of all 'walk only' trips are more than 10 minutes.
31. From HUD's perspective, restricting development in the City Centre fringe either makes it less likely to occur, or shifts it to less accessible locations, requiring longer commute times and increasing the cost of living in the areas that provide the greatest opportunities. This has inevitable equity impacts – with the costs falling predominantly on future homeowners, renters and the public at large.

Relief sought by HUD

32. HUD considers that the Johnsonville train line should be identified as rapid transit and adjust the zoning around the relevant stops accordingly, consistent with the policy directives in the NPS-UD.

³ <https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/02-1-pc-78-section-32-policy-3-intensification.pdf>.

⁴ <https://www.nzta.govt.nz/assets/resources/understanding-attitudes-and-perceptions-of-cycling-and-walking/Waka-Kotahi-Attitudes-to-cycling-and-walking-final-report-2020.pdf>.

33. HUD also considers that the high density zoning and around the city centre should be amended to cover at least the area within a 15 minute walkable catchment (rather than the current 10 minute catchment) of the City Centre Zone.
34. HUD supports the recommendations of the section 42A report writer in relation to those two issues.

Dated 16 February 2023

Benjamin Wauchop
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