

## HEARING STREAM 4: CENTRES

### WRITTEN SUBMISSION OF JULIE PATRICIA WARD

#### INTRODUCTION

1. My name is Julie Patricia Ward. I have lived in Wellington since 1989 and through quirk of fate find I have moved house only twice in that time from the one-bedroom flat in Ngaio which I rented with my husband on arrival in the city. Today I find myself living only 1.9km from where I started. Thirty-four years, lots of walking, busing and driving, and three children later, I feel I know my neighbourhood and the wider city well.
2. I live close to the Khandallah Village Centre and I walk through it or near it almost every day.
3. My specific area of interest is Khandallah and I will mostly confine my submission to this centre. When I refer to other centres it is not to suggest how I think they should be treated in the PDP but rather to demonstrate where Khandallah fits in the hierarchy of centres.

#### CENTRE CLASSIFICATION

4. Part 3 of the PDP states the purposes of Local and Neighbourhood Centres:

*“The purpose of the **Local Centre Zone (LCZ)** is to provide for a range commercial, community, recreational and residential activities. These centres **service the needs of the surrounding residential catchment and neighbouring suburbs**. Local centres support the role and function of other Centre Zones in the hierarchy of centres”*

*“The purpose of the **Neighbourhood Centre Zone (NCZ)** is to provide for predominantly for small-scale commercial activities and community activities that **service the needs of the immediate residential neighbourhood** and support the role and function of other Centre Zones in the hierarchy of centres.”*

5. The main issue I want to address is whether the Khandallah centre services the needs of the immediate residential neighbourhood or whether it services the needs of the surrounding residential catchment and neighbouring suburbs. Secondly, whether the increased densification proposed for Khandallah will meet the overall objectives of the PDP.

6. Khandallah Shopping Village in Ganges Road has been classified as a Local Centre in the PDP. The definition is difficult to match easily with lived reality. It seems to me to fit better into the Neighbourhood centre zone (NCZ).
7. There are three reasons I consider Khandallah is better categorised as a Neighbourhood Centre:
  - The centre is small relative to other Local Centres; (paragraph 17)
  - There are a small number businesses the centre. They are predominantly food related retail and personal services which provide limited employment opportunities in terms of the quantity and in many cases the quality of jobs available (paragraphs 24-27);
  - The centre does not serve any neighbouring suburbs (paragraphs 19-23).

## **BACKGROUND ON KHANDALLAH**

### **Location**

8. Khandallah is bordered by the outer Town Belt and is approximately 7 kilometres from Te Ngakau Civic Square.
9. The neighbouring suburbs are Broadmeadows to the north, Ngaio to the west and Kaiwharawhara to the south.
10. Along with Ngaio and Crofton Downs, Khandallah comprises one of three smaller centres that sit between the larger Local Centre of Karori just over 8 kilometres to the west and the proposed Metropolitan Centre of Johnsonville 3.7 kilometres to the north.

### **Access to Khandallah**

11. I note that the Mr Patterson in the Stream 2 Council Right of Reply has stated the Karori, which is 6 kilometres from Te Ngakau Civic Square, is “located a great distance from the central area and (he notes) that access to Karori is very limited given there is only one viable way in and out of the suburb.” (<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/02/right-of-reply/right-or-reply-responses-mr-josh-patterson.pdf>) The same comments can be made of Khandallah.

12. Khandallah Town Hall in the centre is 7.7 kilometres from Te Ngakau Civic Square, an even greater distance from the central area and has similar limited access issues.

(<https://www.google.com/maps/dir/Khandallah+Town+Hall+%26+Cornerstone+Community+Centre+11+Ganges+Road,+Khandallah,+Wellington+6035/Te+Ngakau+Civic+Square,+Wellington+Central,+Wellington/@-41.2576622,174.7542349,13z/data=!3m1!4b1!4m14!4m13!1m5!1m1!1s0x6d38ae0bb6467ce3:0x7df9af6f821af03e!2m2!1d174.791309!2d-41.2467902!1m5!1m1!1s0x6d38afd6be6da239:0xdc43acd63cb06afb!2m2!1d174.7772812!2d-41.2886942!3e0?entry=ttu>)

13. **Road access** to Khandallah from the CBD is via the narrow winding Onslow Road from Kaiwharawhara or through the suburb of Ngaio via Kaiwharawhara Road which has been on one way traffic control for the past two years due to a major slip.

#### **14. Public Transport**

Khandallah is served by the following public transport:

- Standard timetable bus service to Johnsonville (Route 24),
- Standard timetable bus service to the CBD via Ngaio (Route 25)
- Standard timetable bus service to the CBD via Onslow Road (Route 24)
- Peak time only bus service from Brandon Street which runs three times in the morning and three times in the afternoon. ( Route 26)
- Week day only bus service which runs hourly between approximately 8 am and 5pm to Victoria University (Route 22)
- Standard timetable rail service to Johnsonville

## 15. Current mode use in Khandallah

TABLE 1 below shows the mode share between vehicles, active and public transport from the 2018 census for the four Khandallah statistical areas and Wellington City as a whole.

TABLE 1 2018 Travel to Work (source Stats NZ)

2018 Transport to Work	%	%	%	%	%
Khandallah census areas	North	South	Reserve	Onslow	Wellington
Drive - private vehicle	43.6	44.3	43.6	47.1	35.8
Drive - company vehicle	5.4	6.2	5.9	6.3	5
Passenger in vehicle	5	6.5	4.8	3.7	3.9
<b>Total in vehicles</b>	<b>54</b>	<b>57</b>	<b>54.3</b>	<b>57.1</b>	<b>44.7</b>
Walk	4.8	4.2	3.8	3.7	19.3
Bike	5.4	4.4	2.6	3.7	4
<b>Total Active</b>	<b>10.2</b>	<b>8.6</b>	<b>6.4</b>	<b>7.4</b>	<b>23.3</b>
Public Bus	8.3	15.4	5.9	20	17.3
Train	13.9	4.7	19.9	2	4
<b>Total Public Transport</b>	<b>22.2</b>	<b>20.1</b>	<b>25.8</b>	<b>22</b>	<b>21.3</b>

16. Issues regarding the adequacy of public transport to Khandallah were extensively addressed in Stream 1 so I will not revisit that aspect here except to say the inadequacy of its public transport is an important factor in my consideration that Khandallah be designated as a Neighbourhood Centre.

### **Size of the Khandallah centre - population and physical area of the centre**

17. TABLE 2 below sets out the current populations around the various centres and the areas of each centre calculated by measurement from the planning maps. It also sets out the centre and walkable catchment zone heights in the Proposed District Plan.

TABLE 2 Wellington Centre Zones Comparison

Centre	Centre Type	Population Stats NZ (000)	Centre Size Estimate (000 sqm)	Centre height*	Walkable catchment height
Tawa	LCZ	12	25	22	21
Churton Park	LCZ	10	16	22	11
Newlands	LCZ	9	17	22	14
Khandallah	LCZ	7	16	22***	14
Crofton Downs	LCZ	2	22	22	11
Karori	LCZ	13	28	18	11
Kelburn	LCZ	4	5	22***	11
Brooklyn	LCZ	7	15	22	14
Island Bay	LCZ	9	20	22+12	14
Newtown	LCZ	10**	88	22+12	21/11
Hataitai	LCZ	6	10	22+12	14
Miramar	LCZ	14	28	22	14
Ngaio	NCZ	4	12	22	11
Wadestown	NCZ	3	3	12	11
Northland	NCZ	4	7	12	11
Marsden	NCZ	3	14	12	11
Aro Valley	NCZ	4	6	22+12	11
Berhampore	NCZ	4	8	22	14

\* PDP has mixed heights in some centres - note Section 42A has modified smaller LCZs

\*\* Newtown is bracketed by Berhampore and Kilbirnie

\*\*\* Section 42A report recommends 18 metres

18. Khandallah is one of the smaller Local Centres in terms of centre size and population.

#### **Khandallah Centre Retail Sales and Catchment**

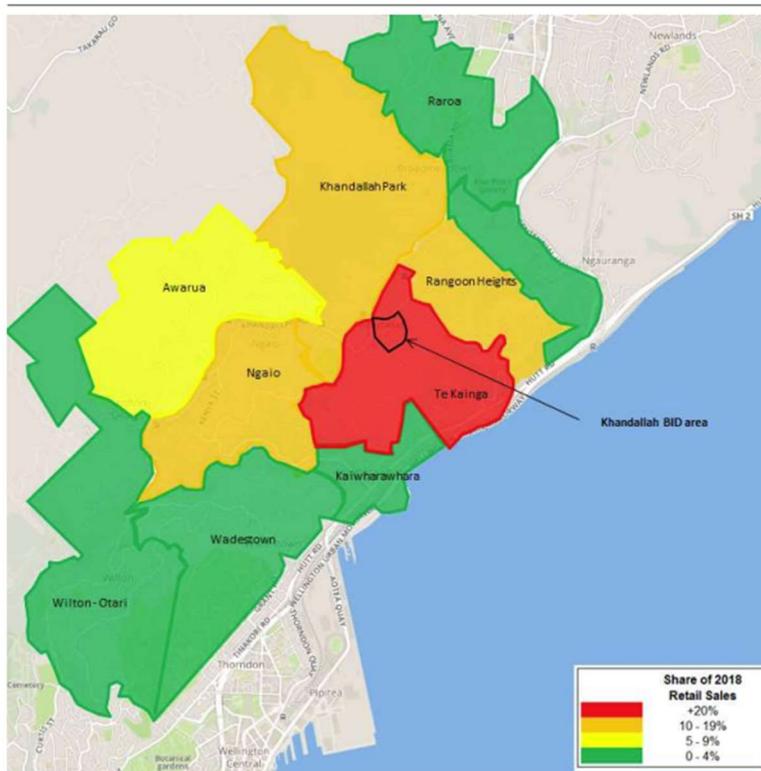
19. It is difficult for an ordinary resident to obtain information about the business spend within the Khandallah Centre. The best information I have been able to access is Khandallah BID Merchant Retail Sales Report for year ending 30 June 2018. (<https://wellington.govt.nz/>-

[/media/your-council/about-the-council/bid/files/khandallah-merchant-2017-2018-financial-year.pdf?la=en&hash=2912FE0447D9E0247EA34BCBBE9E5F25D2D4FFF7\)](/media/your-council/about-the-council/bid/files/khandallah-merchant-2017-2018-financial-year.pdf?la=en&hash=2912FE0447D9E0247EA34BCBBE9E5F25D2D4FFF7)

20. The report identifies that there are 18 businesses in the centre. Lawrence Collingbourne of ORCA has canvassed businesses in the centre in the week ending 16 June 2023 and ascertained that the centre provides fewer than 200 Full Time Equivalent jobs, which is a small number compared to its population of 7,000.
21. Retail sales in the Khandallah BID area represent around 1.0% of total retail sales in Wellington City. Due to the low number of merchants, comprehensive retail sales reporting by spend category is not available.
22. 29% of sales in the centre are attributed to local residents, being those in the area known as Te Kainga, but a closer analysis reveals that a further 48.7% of sales (77% total) are attributable to residents no further north than Raroa and no further south than Ngaio. See map sourced from the report referred to above (page 11)

### Contribution to retail sales by customer origin

Absolutely Positively  
**Wellington City Council**  
Me Heke Ki Pōneke



23. There are currently five BID's within Wellington City of which Khandallah is the smallest and I have set out in the TABLE 3 below comparative sales information for the year ending 30 June 2018 as this is the last year for which there is available data for Khandallah.

TABLE 3 BID data from WCC

CENTRE	Retail Sales YE 30/6/18	% of Wellington City Total retail sales	Number of Merchants
Karori	\$76.9 million	2.5%	75
Khandallah	<b>\$30.5 million</b>	<b>About 1%</b>	<b>18</b>
Kilbirnie	\$161.8 million	5.2%	75
Miramar	\$91.9 million	3%	47
Tawa*	\$123.8 million	3.8%	88

\*Tawa data is to 30 June 2019 as there is no report available to 30 June 2018.

Sources: <https://wellington.govt.nz/-/media/your-council/about-the-council/bid/files/karori-bid-presentation-final.pdf?la=en&hash=A712A848165C6EEF7B16B10327D61F5D72C41341>

(Karori)

[https://wellington.govt.nz/-/media/your-council/about-the-council/bid/files/khandallah-merchant-2017-2018-financial-](https://wellington.govt.nz/-/media/your-council/about-the-council/bid/files/khandallah-merchant-2017-2018-financial-year.pdf?la=en&hash=2912FE0447D9E0247EA34BCBBE9E5F25D2D4FFF7)

[year.pdf?la=en&hash=2912FE0447D9E0247EA34BCBBE9E5F25D2D4FFF7](https://wellington.govt.nz/-/media/your-council/about-the-council/bid/files/khandallah-merchant-2017-2018-financial-year.pdf?la=en&hash=2912FE0447D9E0247EA34BCBBE9E5F25D2D4FFF7) (Khandallah)

[https://wellington.govt.nz/-/media/your-council/about-the-council/bid/files/kilbirnie-merchant-2017-2018-financial-](https://wellington.govt.nz/-/media/your-council/about-the-council/bid/files/kilbirnie-merchant-2017-2018-financial-year.pdf?la=en&hash=434C878E4EA7CCEA37C59F76950664AE556560BE)

[year.pdf?la=en&hash=434C878E4EA7CCEA37C59F76950664AE556560BE](https://wellington.govt.nz/-/media/your-council/about-the-council/bid/files/kilbirnie-merchant-2017-2018-financial-year.pdf?la=en&hash=434C878E4EA7CCEA37C59F76950664AE556560BE) (Kilbirnie)

<https://wellington.govt.nz/-/media/your-council/about-the-council/bid/files/miramar-merchant-report.pdf?la=en&hash=B43F8353D30CF0085C07F466DD44A45BD1E2A899>

(Miramar)

[https://wellington.govt.nz/-/media/your-council/about-the-council/bid/files/tawa-bid-merchant-retail-sales-report-](https://wellington.govt.nz/-/media/your-council/about-the-council/bid/files/tawa-bid-merchant-retail-sales-report-2019.pdf?la=en&hash=2095DCD96D00EA914CF82A259B256428F4E66335)

[2019.pdf?la=en&hash=2095DCD96D00EA914CF82A259B256428F4E66335](https://wellington.govt.nz/-/media/your-council/about-the-council/bid/files/tawa-bid-merchant-retail-sales-report-2019.pdf?la=en&hash=2095DCD96D00EA914CF82A259B256428F4E66335) (Tawa)

## Services available in Khandallah and surrounding centres

24. TABLE 4 sets out a range of neighbourhood services available in Khandallah. Most of these are also available in the neighbourhood centre of Ngaio. The services marked with an asterisk are available in the wider suburb but not within the centre.

TABLE 4 Centres Comparison - Range of Neighbourhood Services

Services	Crofton Downs	Ngaio	Khandallah	Johnsonville	Karori
Town Hall		✓	✓	✓	✓
Library		✓	✓	✓	✓
Swimming Pool			*	✓	✓
Dairy		✓	✓	✓	✓
Takeaways		✓	✓	✓	✓
Cafés	✓	✓	✓	✓	✓
Restaurant				✓	✓
Pub			✓	✓	✓
Butcher		*	✓		*
Postal services		✓		✓	✓
Supermarket	✓		✓	✓	✓
Liquor Store		✓		✓	✓
Pharmacy	✓	✓	✓	✓	✓
Medical centre		✓	✓	✓	✓
Physiotherapist	*	✓	✓	✓	✓
Vet	*		✓	✓	✓
Dry Cleaner			✓	✓	✓
Hair Dresser		✓	✓	✓	✓
Service Garage			✓	✓	✓
Petrol Station		✓		✓	✓
Hardware DIY	✓				
Clothing				✓	
Film/Theatre					

\*In wider area not within the centre

25. Broadmeadows residents have to leave their suburb for almost all services but they would have to walk at least thirty minutes to access a limited range of services in Khandallah when they could take the same half hour walk and access the Johnsonville Metropolitan Centre with its wide range of commercial, civic and government services, office, community, recreational, entertainment and residential activities.
26. Kaiwharawhara residents similarly have to leave their suburb for almost all services. They have a 26-minute uphill walk to reach the Khandallah Centre or a thirty-minute flat walk to the Thorndon New World supermarket and a bit further to access all of the services of the Wellington CBD with its wide range of commercial, civic and government services, office, community, recreational, entertainment and residential activities.
27. Since the Proposed District Plan was promulgated the one restaurant in the Khandallah Centre open for evening dining (Taste) has closed and been replaced by a day time café. The Post Shop has also closed resulting in the removal of both the post office box service and posting boxes so Khandallah residents now have to go elsewhere to post a letter.

### **Services Outside the Centre**

28. Public Transport, community facilities and services are not concentrated within the Khandallah centre but rather quite widely dispersed. Of particular concern to me is the long distance from the centre to children's playgrounds and public green space. See TABLE 5 on the next page.

TABLE 5 – Distance of other services from Khandallah Centre

Amenities	Distance from Centre	Walking Time
Simla JVL train station	800 metres	9 minutes
Box Hill JVL train station	290 metres	4 minutes
Khandallah Train Station	750 metres	9 minutes
Khandallah School	600 metres	8 minutes
Cashmere Avenue School	800 metres	10 minutes
St Benedict's School	650 metres	9 minutes
Khandallah Kindergarten	300 metres	4 minutes
Onslow Kindergarten	500 metres	6 minutes
Khandallah Little School	700 metres	9 minutes
Tennis Club	850 metres	11 minutes
Bowls Club	700 metres	10 minutes
Croquet Club	650 metres	9 minutes
Swimming Pool*	800 metres	11 minutes
Nairnville Park/Playground	1000 metres	12 minutes
Khandallah Park/Playground	950 metres	12 minutes
Scout Hall	750 metres	9 minutes

\* Summer only

### Heritage considerations

29. Khandallah has not been designated as a heritage area but it does have two heritage buildings in the centre. The Khandallah Library is a one storey building and the Khandallah Town Hall three storeys. The mixed use building next to the Town Hall is about 12 metres and it exceeds the height of the Town Hall. Building of even greater scale will dwarf both the heritage buildings

### Wind

30. Khandallah generally and Ganges Road in particular is frequently subjected to very high winds from the north off Mt Kaukau as well as strong winds from the south. Given the recent pattern of development it seems likely than any development of the centre in the short to medium term would be a single isolated tall building. An 18-metre structure added to the existing line up could create high speed wind effects dangerous to those using the street who

are less steady on their feet such as elderly people and small children and in any event would make use of the street unpleasant for all users. Similar issues may well arise with 14 metre structures around the centre.

## SUBMISSIONS

31. I see an inherent conflict between supporting walkable neighbourhoods as expressed in LCZ-04 and the purpose of the City Centre Zone which is to enable and reinforce the continued primacy of the Wellington central city area as the principal commercial and employment centre servicing the city and metropolitan region. With fewer than 200 jobs in Khandallah, Wellington City is our principal commercial and employment centre, with the Johnsonville Metropolitan Centre providing closer, but quite underdeveloped, opportunities. Travel to work from Khandallah is predominantly by car and walking to work is far below the Wellington average.
32. The evidence of Dr Helm for Newtown Residents Association (<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/04/submitter-evidence/newtown-residents-association/submitter-evidence--t-helm-for-newtown-residents-association-440--fs74.pdf>) paragraph 46 states “zoning rules just shape where housing goes and what it looks like – not how much is built.” Enabling densification around Khandallah Village might encourage more homes in Khandallah, but it will be at the expense of homes in more walkable areas with better services, transport and accessibility to employment.
33. Appended to Mr Patterson’s evidence for Stream 2 is Mr Osborne of Property Economics response to Mr Cullen’s evidence of 16 March. Mr Osborne has pointed out consistent with the evidence of Dr Helm that the increase 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> p 31 of PDF (p2 of Mr Osborne’s evidence).

34. In a city of just 210,000 (even if growing to 300,000 people) the City Centre Zone, two Metropolitan Centres, and fifteen Local Centres may be spreading the city's resources too thinly. While I might not agree with the specific prescriptions of Kainga Ora, I do think there is merit in focusing the city's commercial and community services development, supported by proportionately higher density residential development, in the four already established larger centres of Karori, Miramar, Tawa and Newtown.
35. Classifying Khandallah as Local Centre Zone seems to overweight the presence of a limited number of shops and services while failing to take into account other factors including walkability to public transport and access to public transport more generally. Given the already well canvassed limitations of the Johnsonville Line, and walkability to community facilities and services given their locations are spread quite widely within the suburb often quite a distance from the centre, I consider a neighbourhood centre is the appropriate level of densification commensurate with the level of commercial activity and community services within the centre.
36. The final issue I would like to mention is “chain trips” and how the location of amenities and jobs can quickly turn what look like a fifteen-minute walkable neighbourhood into a one hour or more trek. In Khandallah a walk from the centre to one of the schools or one of the kindergartens and onward to public transport for a parent is not a A to B walk such as a single person might take from home to public transport. A chain trip has costs in time as well as distance. Walking catchments should therefore be limited to five minutes.
37. The World Bank has stated “Evidence from both developed and developing countries is showing that men and women have different patterns in traveling and accessing public spaces. Women typically walk longer distances than men and make frequent, shorter trips with more stops to combine multiple tasks. Men, by contrast, tend to follow more direct and linear patterns. Females engage in more non-work-related travel than males and are more likely to be accompanied by children or elderly relatives. They are also more reliant on public transport. Yet in most countries, transport infrastructure and services cater primarily to the needs of commuters who travel straight from their home to the central business district and back—an approach that largely overlooks the mobility needs and travel patterns of women.”(<https://blogs.worldbank.org/transport/all-too-often-transport-women-are-afterthought>)

38. In 2022 Victoria University researcher, Zara Molijn, published a paper entitled “Barriers to Active Travel: Among Primary School-Aged Children in Wellington” (pdf version available at <https://ojs.victoria.ac.nz/pq/article/view/7502/6665>) 42% of children were transported by car because it was the fastest and most convenient way to get to school. Comments from (p.82) from the survey respondents show little has changed since my children were young: “One commented: *‘school start time. For any parents that work, a normal day begins at 9am. Most schools only open at 8.30. Half an hour is not a lot of time to get from school to work, so often, parents will choose to drive rather than take a bus/train or use active transport. If the parent is driving to work, they will drive the kids to school first. Also, consideration of sibling’s (sic) transport requirements. Easy to factor in active modes of transport if you are all doing the same thing, but if everyone needs to be in different places, it’s more convenient and time efficient to drive.’* And another respondent: *“I am impressed this survey is delving into home circumstances and family work commitments. These overwhelmingly dictate mode choice. Many families would love to use active modes, but it can be difficult to fit in to family routines.”*
39. Higher density around Khandallah village does not facilitate the needs of families and caregivers whose transport needs around the suburb and then onwards to work are more complex.
40. There are inconsistencies in the height limits within and around Local Centres for which it hard to ascertain a clear rationale or explanation. See Table 1 at paragraph 16. I contend that Khandallah is more akin to Karori, Kelburn, Churton Park and Crofton Downs and should be zoned similarly. All those centres have an 11-metre height zone within the walkable catchment of the centre. Given the way services are dispersed throughout Khandallah there seems no advantage in higher density (14m) around the centre as many of the services are located outside the centre. We also need to protect the value of our two heritage buildings.
41. The proposal for a stepped down arrangement in Khandallah was a rushed decision put forward by officers and approved by councillors just minutes after WCC voted that the Johnsonville Line was not a rapid transit service. It appears to follow through from Wellington City Council’s Spatial Plan which predated the passing of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (MDRS) which enables three houses of three storeys (11 metres) anywhere in Wellington City.

42. At the time the Spatial Plan was promulgated it was anticipated that much of the outer suburbs would remain no higher than two storeys and that a gradual reduction in heights would be appropriate as development occurred further from centres. This is no longer the case. Mr Patterson has clarified in the Stream 2 right of reply that 94.40% of the area covered by the Outer Residential Zone (currently limited to 8 metres and 35% site coverage in the Operative District Plan) will be rezoned for Medium Density of at least three storeys and 50% site coverage under the PDP.

## CONCLUSION

43. I am a believer in the “Strong Towns” movement spearheaded by the American writer, Charles L Marohn, Jr. The movement states one simple rule in relation to housing: *“No neighbourhood should experience radical change, but no neighbourhood can be exempt from change.”* It advances the further premises that, “No neighbourhood should transform in ways that make it unrecognizable to those rooted in that place, but the rate of change for every neighbourhood must be greater than zero. There should be no substantial barrier—nearly zero regulatory friction or fiscal impediment—that prevents a neighbourhood from evolving over time in response to local needs. Whatever the next step of development maturity is for a neighbourhood, the local government must actively facilitate that transition.”

(<https://www.strongtowns.org/housing>)

44. My contention is consistent with Mr Niven’s expert evidence that “good quality, well-functioning urban environment” that positively contributes to Khandallah’s characteristic sense of place, quality and the amenity of its surroundings can be achieved within a 12 metre height zone. (<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/04/submitter-evidence/onslow-residents-association-and-julie-ward/submitter-evidence--s-niven-for-onslow-residents-community-association-283--fs80.pdf>)

45. The next increment for Khandallah is three storeys. This is compatible with Policy 3(d) of the NPS-UD. The building heights and densities of urban form commensurate with the level of commercial activity and community services within the neighbourhood centre is 12 metres and adjacent to the neighbourhood centre 11 metres.