

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

JCA Response to Question asked during Presentation for Stream 9

Introduction

I would like to start by again thanking the Chairman and Commissioners for listening to the Johnsonville Community Association (JCA) presentation on 13th June 2024 and also for reading the JCA Presentation for Stream 9 on the Proposed District Plan (PDP) for 2024-2034.

During the presentation the Chairman asked – to paraphrase:

- what recommendations would the JCA suggest that were within the scope of the District Plan, and that
- the Commission could therefore include in their recommendations

in order to provide a framework that would facilitate the JCA's desired changes to public transport provisions.

While JCA did provide a response during the hearing, your question prompted and challenged us to further consider how the rules in the District Plan can ensure that public transport is fit for purpose to serve in High Density and Metropolitan Centre zone areas.

The JCA would therefore ask the Commission to also consider our additional response below as part of the JCA's hearing submission.

The JCA Additional Response Submission to the Commission Question

The JCA is firmly of the opinion that suitable infrastructure, including public transport, must be provided as an integral part of any High Density and Metropolitan Centre zone development to ensure that the goals of the District Plan to provide a high quality well-functioning urban environment for residents is achieved.

The JCA concerns are based on the reality that the Johnsonville High Density and Metropolitan Centre zones do **not** have the supporting public transport and other infrastructure reflected in the Proposed District Plan (PDP). These views were part of JCA submissions to the Commission in Streams 1, 2, 4, 5 and the Wrap Up for the ISSP Chapters of the Proposed District Plan.

The importance of investing in supporting infrastructure to enable a “Well-Functioning Urban Environment” is recognised in previous ISSP Chapters with key extracts outlined in the Appendix below. However, the importance of implementing this supporting infrastructure is not even mentioned let alone supported in the PDP Chapters on Transport and Infrastructure.

This means there is a serious disconnect between:

- the Chapters in the previous ISSP Chapters, versus
- the Transport and Infrastructure Chapters in Stream 9

and it is the lack of support for infrastructure investment in the Transport and Infrastructure Chapters that the JCA highlighted in our oral submission to the Commissioners on 13 June 2024.

We would also like the Transport Chapter to specifically address the designation of the Johnsonville Rail Line as Rapid Transit Service when the Commission unanimously assessed the Johnsonville Rail Line currently did not meet the criteria as defined in the NPS-UD as outlined in the Commission's report to the Wellington City Council (WCC) (Section 3.3 of Report 1A refers). The Commission's concluding decision states:

226. We find that the Johnsonville Rail Line service is not frequent, and nor is it planned to become frequent in the sense required by the NPSUD.

The Commission's decision was disputed by the WCC and the deciding Minister, Hon Chris Bishop, sided with the Council view **that the Johnsonville Line is to be designated as a Rapid Transit Service in the PDP under the provisions of the NPS-UD**. Given the clear evidence that the Johnsonville Rail Line is not currently a Rapid Transit Service, the need for investment to either:

- make it so, or
- to provide an equivalent service

needs to be addressed in the PDP. It seems obvious to the JCA that the Transport Chapter of the PDP would be an appropriate place in which to highlight the assumed future investment in **Rapid Transit Service** to support the decisions of both the Council and the Minister. For the PDP to ignore this decision in the Transport Chapter would lead to the future already predicted by the Commission:

231. By contrast, if a train service is not in fact a rapid transit service, the scenario painted by Dr Helm is likely to take effect. Intensification in outer suburbs will lead to greater levels of car use, more road congestion, and more greenhouse gas emissions, contrary to Objective 8 of the NPSUD.

The Introduction to the Transport Chapter of the PDP also needs to outline the infrastructure investment assumed to support a "Well-Functioning Urban Environment" and support the rest of the PDP statements on Transport outlined in earlier ISSP Chapters. This includes statements that Johnsonville is supported by investment in a Rapid Transit Service which is either a rail, or a bus, based Rapid Transit Service.

The JCA also notes the Transport Chapter does not even mention supporting the needs of people with disabilities. Again, providing high quality footpaths, disabled car parks and accessible public transport are especially important to the City Centre, Metropolitan Centre and High Density Residential Zones.

It is essential that the District Plan does provide support for, and indeed include, clear criteria for public transport and infrastructure against which any proposed high density development can be assessed, with a high threshold, if any, for any exemptions.

Accordingly, the JCA makes the following additional recommendations to the Commission for Stream 9:

Recommendation AS1: That the Introduction Section of the Transport Chapter of the PDP have statements about the need to invest in high quality public transport and active transport modes as key elements of a Well-Functioning Urban Environment for Metropolitan Centre and High Density Residential Zone areas. This should include the need to implement a public transport Rapid Transit Service for Johnsonville.

Recommendation AS2: That the Introduction Section of the Transport Chapter of the PDP contain a commitment to protect the Johnsonville Rail Line transport corridor for possible expansion in the future. This protection for possible future expansion should include double tracking, overbridges, etc.

Recommendation AS3: That the Introduction Section of the Transport Chapter of the PDP also outline that transport infrastructure must support access for people with disabilities as a key element of a Well-Functioning Urban Environment throughout Wellington City.

Conclusion

It is essential that the District Plan does provide support for infrastructure investment in high quality public transport and three waters facilities for Johnsonville. This is reflected in other Chapters of the PDP but is a key element missing from the Transport and Infrastructure Chapters.

If the Commission requires any further information or evidence regarding the JCA's Additional Submission, please let us know.

Warren Taylor
on behalf of the Johnsonville Community Association

The following are extracts from other Chapters of the PDP related to investment in transport and infrastructure that need to be captured by the Transport and Infrastructure Chapters in order to create a well-functioning environment for Johnsonville:

Definitions:

RAPID TRANSIT – has the same meaning as ‘rapid transit service’ in the National Policy Statement on Urban Development 2020, as follows:

‘means any existing or planned frequent, quick, reliable and high-capacity public transport service that operates on a permanent route (road or rail) that is largely separated from other traffic’.

For the avoidance of doubt, rapid transit within the boundaries of Wellington City includes the Kapiti Rail Line and the Hutt/Melling Rail Line.”

WELL-FUNCTIONING URBAN ENVIRONMENT – means an urban environment that, as a minimum:

...

d. has accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

Strategic Direction:

CEKP-O2 – The City maintains a hierarchy of centres based on their role and function, as follows:

...

2. Metropolitan Centres – these centres provide significant support to the City Centre Zone at a sub-regional level by offering key services to the outer suburbs of Wellington City and the wider Wellington region. They contain a wide range of commercial, civic and government services, employment, office, community, recreational, entertainment and residential activities. Metropolitan Centres are major transport hubs for the City and are easily accessible by a range of transport modes, including rapid transit. As a result, these centres are will be major live-work hubs for the City over the next 30 years. Intensification for housing and business needs will be enabled in these locations, to complement the City Centre;

The Council’s Introductory Comments on it’s Strategic City Assets and Infrastructure Framework as follows:

Infrastructure is critical to the ability of Wellington City to thrive and grow. The expected population growth over the next 30 years will place pressure on this infrastructure, and in particular for the three waters and transport networks. It is important that the District Plan supports a coordinated approach to infrastructure planning.

...

The sequencing of development to align with increases in infrastructure capacity also needs to be carefully managed, while not hindering efforts to provide for housing and business needs. The National Policy Statement on Urban Development requires that local authorities enable sufficient development capacity for housing and business needs over the short, medium and long term. This includes providing ‘infrastructure-ready’ capacity.

High Density Residential Development:

The efficient use of land and infrastructure within the High Density Residential Zone is important to meet the strategic objectives of maintaining a compact urban form and providing new housing to help address the City's housing needs. This will also ensure that residents have convenient access to retail, services, employment and public transport.

Metropolitan Centre Zone:

The Metropolitan Centre Zone is a focal point for sub-regional urban catchments and provides significant support to the City Centre Zone by offering key services to the outer suburbs of Wellington City and the wider region. This is identified in the Wellington Regional Policy Statement. These centres contain a wide range of commercial, civic and government services, office, community, recreational, entertainment and residential activities and have well established access to public transport.

The Council's Complete Strategic City Assets and Infrastructure Framework Introduction as follows:

Introduction

Infrastructure is critical to the ability of Wellington City to thrive and grow. The expected population growth over the next 30 years will place pressure on this infrastructure, and in particular for the three waters and transport networks. It is important that the District Plan supports a coordinated approach to infrastructure planning. The City hosts some major infrastructure facilities, such as the Commercial Port and Wellington International Airport, which not only serve the immediate City, but also play a major role at the regional and national scale. There are also likely to be major transport projects for the City in the coming years that will need to be provided for. The District Plan must enable these activities to continue to establish, operate and function.

The sequencing of development to align with increases in infrastructure capacity also needs to be carefully managed, while not hindering efforts to provide for housing and business needs. The National Policy Statement on Urban Development requires that local authorities enable sufficient development capacity for housing and business needs over the short, medium and long term. This includes providing 'infrastructure-ready' capacity.

Given the significant costs involved with servicing new growth with infrastructure, Wellington City is taking a long-term and pragmatic approach to prioritising growth areas for infrastructure investment through its Spatial Plan, Long Term Plan and Infrastructure Strategy. Future development must align with this sequencing as much as possible. However, it is not intended that this approach hinder developments that have broader benefits to the City. Out-of-sequence development proposals (including private plan changes) will need to show that the development will result in a significant increase in development capacity, and that the necessary servicing and funding for the development is available.

The Council will also encourage the use of green infrastructure to manage the impacts of development on the City's infrastructure network. Green infrastructure will not only assist with managing infrastructure pressures, but also supports the broader City goals of a more sustainable and greener City.

Strategic Objectives	
SCA-O1	Infrastructure is established, operated, maintained, and upgraded in Wellington City so that: 1. The social, economic, cultural, and environmental benefits of this infrastructure are recognised; 2. The City is able to function efficiently and effectively; 3. The infrastructure network is resilient in the long term; and 4. Future growth and development is enabled and can be sufficiently serviced.
SCA-O2	New urban development occurs in locations that are supported by sufficient development infrastructure capacity, or where this is not the case the development: 1. can meet the development infrastructure costs associated with the development, and 2. supports a significant increase in development capacity for the City.
SCA-O3	Additional infrastructure is incorporated into new urban developments of a nature and scale that supports Strategic Objective UFD-O6 or provides significant benefits at a regional or national scale.
SCA-O4	The adverse effects of infrastructure are managed having regard to the economic, social, environmental and cultural benefits, and the technical and operational needs of infrastructure.
SCA-O5	Infrastructure operates efficiently and safely and is protected from incompatible development and activities that may create reverse sensitivity effects.

In relation to the SCA-O5 objective, the JCA notes that the Council’s plan to densify Johnsonville with a 60% increase in population from 10,000 to 16,000 residents over the next 30 years without a public transport rapid transit service to meet the commuting needs of these residents will create an incompatible development. This incompatible development will create the following reverse sensitivity effects first identified by Dr. Helm and noted by the Commission and included in the Commission’s Report 1A to the Council:

231.Intensification in outer suburbs will lead to greater levels of car use, more road congestion, and more greenhouse gas emissions, contrary to Objective 8 of the NPSUD.