

To: Hearing Panel

JCA Executive Summary Overview

Is the Johnsonville Rail Line a Rapid Transit Service?

Firstly, the JCA would highlight our community would love to have a Rapid Transit Service into the Wellington CBD. Indeed, in a 2006 review of the Johnsonville Line, a majority of submitters asked for it to be turned into a Bus Rapid Transit service but the government and regional council decided to keep the rail. We look on with envy at the proposed Mass Transit Service proposed to Island Bay but we also face the reality that our community is served by a slow, infrequent rail service and an unreliable bus service which is why we have one of the highest car usages in Wellington City.

Secondly, we acknowledge the excellent work by Timothy Helm and Don Wignall as expert witnesses for the Wellington Character Charitable Trust and we agree with their evidence.

Outlined below is an up to date summary of the key decisions currently determining whether the Johnsonville Rail Line is, or is not, a Rapid Transit Line.

In the NPS-UD it says *“rapid transit service means any existing or planned frequent, quick, reliable and high-capacity public transport services that operates on a permanent route (road or rail) that is largely separated from other traffic”*.

Guidance from the Ministry of Environment also made clear it was for local councils to decide whether a public transport service was or was not a Rapid Transit Service under the NPS-UD.

Identifying Rapid Transit in Auckland

Auckland Transport, in conjunction Auckland City Council, Waka Katohi and other agencies developed an assessment standard called the “Rapid Transit Baseline”. As outlined in their LGOIMA response:

*Auckland Transport (AT) has been collaborating on the development of an Auckland Rapid Transit Plan with Auckland Council (AC) and Waka Kotahi New Zealand Transport Agency (WK). **An early part of this project involved the development of a ‘Rapid Transit Baseline’ (Baseline), by which these three agencies agreed on a shared understanding of rapid transit in the Auckland context.** This Baseline document’s definitions are the basis on which decisions were made regarding which services would be included as rapid transit in the RTLP. **The Baseline document has also been through the governance of the Auckland Transport Alignment Project (ATAP), which includes representatives from the Ministry of Transport, KiwiRail, the Treasury, and other central government agencies.***

They then applied this standard to their public transport services and determined many did meet the Rapid Transit criteria.

However, Auckland Transport concluded that the Onehunga Passenger Rail Line is not a Rapid Transit service because it fails to meet the Rapid Transit Frequency criteria and have publicly declared that Line is not a Rapid Transit Line.

More specifically, the AT Rapid Transit Baseline states:

Rapid transit is a form of high-capacity public transport moving large numbers of people throughout the day. Together, multiple rapid transit services form the rapid transit network (RTN). Rapid transit services operate at high frequencies throughout the day (at least every 15 minutes) and are therefore part of the frequent public transport network.

*What distinguishes rapid transit from the frequent network and wider public transport network is the **higher quality experience it provides customers**. Its service characteristics and corridor design, discussed in more detail below, mean rapid transit **can move large numbers of people quickly, and efficiently**. For this reason, rapid transit is the core of the wider public transport network, supported by other public transport services.*

...

*Frequent – rapid transit services form part of the frequent public transport network, and therefore operate at **frequencies that enable users to ‘turn up and go’ at most times of day, seven days a week** (Footnote 2) These high frequencies enable rapid transit to quickly shift large numbers of people and allow for efficient connections between different public transport services.*

Footnote 2 *A true ‘turn up and go’ frequency would be a minimum of every 10 minutes. Currently, some rapid transit services only achieve this during the peak. The RPTP aspires for the entire rapid transit network to achieve this minimum frequency by 2028. The current definition in the RPTP is at least every 15 minutes, between 7am and 7pm, 7 days a week.*

Identifying Rapid Transit in Wellington

In early 2021, Waka Katohi published the One Network Framework (ONF) which was drafted by the Road Efficiency Group. This Framework aims to provide a common language for NZ transport projects including the categorisation of public transport corridors. It stated:

By definition, all Metro Rail lines, and ferry sea lanes would be classified as PT1 as they are considered rapid transit corridors irrespective of headway, availability and or volume of people movement. For this reason, all Metro Rail and ferry services are described in Vehicle Volume as PT1.

At the same time the Greater Wellington Regional Council drafted and consulted on the updated Regional Land Transport Plan (RLTP) document. This decided the Johnsonville Line is a Rapid Transit Service based on the above definition under the ONF and quoted from the

ONF. The GWRC stated, in an OIA response, that they did not have any definitions for any of the criteria for Rapid Transit as outlined in the NPS-UD (e.g. fast, frequent).

The Wellington City Council was fully involved in the development of RLTP including the decision to classify the Johnsonville Line as Rapid Transit based on the ONF. It was on the designation that the Johnsonville Rail Line is a rapid transit service in the RLTP that the Draft District Plan was developed including 6-storey walking catchments around all stations. This reliance on the above ONF definition is reflected in the Section 42A evidence from Mr. Wharton.

In December 2021, the JCA submitted on the Draft District Plan stating that the WCC does not have any evidence that the Johnsonville Line is Rapid Transit because it relies on the RLPT/ONF and the ONF does not hold any research or reports that support its PT1 definition outlined above.

In May 2022, members of the ORCA and the JCA described the serious issues with the claim that the Johnsonville Line is a Rapid Transit service in a detailed written report to the Wellington City Council.

In June 2022, council officers stated in their recommendation to the Wellington City Council that the Johnsonville Line was rapid transit based on it meeting the PT1 category in the ONF (April 2021 document). **The Wellington City Council voted to remove the Johnsonville Rail Line as being a Rapid Transit Line against this advice.**

In September 2022, the JCA met with the ONF team and they confirmed that the ONF is **not** a standard that can be directly applied to solve real world transport problems. For example, the ONF alone is not suitable to assess whether a specific public transport service is, or is not, a rapid transit service under the UPS-UD. If either the WCC or the GWRC had bothered to check on the validity of their use of the ONF in the RLPT with the ONF Team, it is unlikely we would be standing here.

In November 2022, the Waka Katohi published the One Network Framework Version 1.0. This updated the ONF classification definitions for public transport. The classification for PT1 was updated to align with the NPS-UD definition of a Rapid Transit service. In particular they separated public transport services that were 4 services per hour all day (7am to 7pm) from those that are not as frequent. The ONF now states:

*PT1: Strategically significant corridors where rapid transit services are operated, providing a quick, frequent, reliable, and high-capacity service that operates on a permanent route (road, rail or sea lane) that is largely separated from other traffic.
>= 4 services per hour*

- *Hutt, Kapiti, Western, Eastern and Southern railway lines in Wellington and Auckland are PT1, Dedicated, they generally provide a frequent service (averaging around 4 trains per hour across the day) ...*
- ***Johnsonville Line & Onehunga Branch Line are PT4, Secondary, because they have less than four services per hour on the corridor.***

It is apparent that the ONF has been following the work of Auckland Transport, agreed with the importance of properly defining what is rapid transit, and accepted the AT Rapid Transit Baseline criteria for rapid transit frequency.

The Johnsonville Community Association has submitted to the PDP that the use of the PT1 classification in the ONF in April 2021 was seriously flawed because it does not align with the NPS-UD definition or international best practice for a Rapid Transit service. This is especially apparent where the NPS-UD states such a service must be both “frequent” and “quick”.

Greater Wellington Regional Council also submitted that the Johnsonville Rail Line is a Rapid Transit service based on the RLTP designation based on the ONF dated April 2021. Further, they have stated that they have no intention to change the RLTP decision on the Johnsonville Line. The GWRC do not seem to be aware the ONF no longer supports the Johnsonville Line being classified as Rapid Transit.

The Waka Katohi submission to the PDP that the Johnsonville Rail Line is a Rapid Transit service based on the RLTP designation but this, in turn, is based on the ONF dated April 2021. Waka Katohi do not seem to be aware the ONF no longer supports the Johnsonville Line being classified as Rapid Transit.

The JCA has always wondered why the Wellington City Council has been zealous in their determination to have the Johnsonville Rail Line classified as rapid transit in contradiction to best practice. One clue comes from the email exchange between GWRC and AT on the AT’s use of their Rapid Transit Baseline:

GWRC Mgr, Reg Transport to AT 3 Feb 2021:

We’ve had a long debate in Wellington about what it is and isn’t with quite a range of views about what needs to be in the RLTP to meet the requirements of the NPS-UD.

I’ve been keen not to deviate from the GPS and NPS-UD definitions for a number of reasons:

...

b. the challenge of what that definition is trying to achieve in terms of human behaviour and what may achieve that in New Zealand. My research from a few years’ ago and Metlink’s approach under previous plans was that for public transport to be attractive, the service frequency needs to be 10 minutes or less (15 mins at a push for example evening or early morning services); stops have to be within 10 minutes walk of the stops; and this level of service needs to be maintained over the entire service period i.e. having rapid transit in peak time only will not lead to an overall behaviour change. My concern here is that we may designate a rail line as rapid transit but if it doesn’t change overall human behaviour then there is little point.

...

AT Mgr (in response):

...

*We have been specific about which parts of our train and busway network we expect to be rapid transit within 10 years though. **Some parts of our rail network we've said don't meet the definition as they aren't/won't be frequent enough.***

...

GWRC Mgr, Reg Transport to AT 12 Feb 2021:

*The first is the Johnsonville line that runs wholly within Wellington City. One views is that this is neither rapid nor can it sustain the frequency that rapid transit might suggest. However, **Wellington City are keen to have it as rapid transit because of the intensification opportunities that it offers particularly at Johnsonville itself.** While the line can't take any more trains – it's single track and runs on a 13 minute headway at peak, it has capacity growth.*

The Correspondance between GWRC and AT show that:

- the GRWC was fully aware of ATs work including that AT had decided some rail lines did not meet the NPS-UD definition of Rapid Transit in February 2021 before the finalised the RLTP.
- GWRC officers understood that the best practice for rapid transit was service frequency needs to be 10 minutes if less to change human behaviour.
- the GWRC understood “*Wellington City are keen to have it as rapid transit because of the intensification opportunities that it offers particularly at Johnsonville itself*”

Response to Officers Section 42A Report Johnsonville Line Assesement

The following outlines the JCA responses to specific comments in the Officer Section 42A Report 4.3.2.

Paragraphs 149-150: It is stated that “*in my opinion the RLTP identification of existing rapid transit services should also be given considerable weight when classifying rapid transit for district plan purposes*”. However, the reliance of the RLTP on the ONF for its assessment is missing. The RLTP states “*This corresponds with the classification of Class PT1 in Waka Kotahi's One Network Framework.*” and even includes the same ONF table outlined in paragraph 155 as “*Table 37: One Network Framework Waka Kotahi*”.

In relying on the RLTP, the WCC is actually relying on the ONF as the GWRC never did any assessment of Wellington public transport services other than using the ONF definitions.

Paragraphs 155-156: This ONF definition of PT1 has now been superseded in the ONF Version 1.0 November 2022.

Paragraph 163: While the decision of whether the Johnsonville Line is or is not Rapid Transit is unlikely to affect housing affordability, inappropriate zoning of the surrounding areas as High Density Housing is likely to lead to poor local amenity and effects.

Paragraph 165-166: The comparison of Wellington City suburban house prices with the regional median price is inappropriate. The median Wellington City house price should be

used as this is \$1,206,050 which indicates, under the officer logic, that Johnsonville (\$1,032,450) is a less than desirable place to live.

Paragraph 170: While the Johnsonville Line, like all rail lines, has an ongoing maintenance programme, there is no planned funding to increase its frequency or capacity in the GWRC Long Term Plan.

Paragraph 174: The officer claims *“In my opinion, if one of these descriptors happens to not apply to a portion of the service, this is not a necessarily a “fatal flaw” that rules out the whole service as being defined as rapid transit”* is simply wrong. Rapid Transit is a public transport service of such high quality that will cause a change in people’s behaviour and attract them out of cars. To do so it must meet all of the criteria outlined in the NPS-UD.

This is the standard set in the AT Rapid Transit Baseline where the Onehunga Line was deemed not rapid transit solely on the basis it did not meet the frequency criteria. Equally, the northern section of the Northern Busway was deemed not rapid transit solely on the basis it did not meet the “largely separated from other traffic” criteria. Note that this approach was agreed in 2021 with Waka Katohi and other agencies.

Paragraph 175: The officer states *“To measure frequency and capacity, I reference the ONF category for rapid transit”*. The ONF Nov 2022 now classifies the Johnsonville Line as PT4 but the WCC officer does not accept this change. In the just released Supplementary Planning Evidence the WCC officer states:

17 This guidance rationale is not correct in my view. Firstly, the NPS-UD does not classify specific transport services as rapid transit. Mr Helm’s evidence (para 31) also makes this point. Wellington City Council has consistently asked for the Minister for the Environment to list existing rapid transit services, but so far the NPS-UD definition remains vague.

18 Secondly, the Johnsonville Line does have four services per hour (peak services), and other services not much less frequent than the Hutt and Kapiti Lines, as summarised below. Hutt and Kapiti express trains bypass many stations, so tend to reduce peak services to around four per hour for most stations. I note that the Wellington RLTP 2021 discusses increasing service frequency and capacity for the Hutt and Kapiti Rail Lines, but not for the Johnsonville Line. However, this does not affect the comparison with the existing agreed rapid transit services.

Statement of supplementary planning evidence of Andrew Wharton on behalf of Wellington City Council – Feb 2022

There are many problems with the above:

Throughout this whole process, the WCC’s has relied on the ONF (via the RLTP) to justify the classification of the Johnsonville Line as Rapid Transit despite multiple submissions this was an incorrect assessment. Now the ONF no longer supports their plans to put high density housing along this rail corridor, the WCC rejects the application of the ONF.

The officer does not offer any clear alternative criteria for frequency under which the Johnsonville Line would be changed to Rapid Transit. Even if such criteria was provided, the

use of such last minute evidence at this stage of the PDP to change the classification of the Johnsonville Line and thereby changing the zoning across many suburbs would be very poor practice. Given the WCC has abandoned the ONF for assessing whether public transport services are or are not Rapid Transit, any replacement criteria should be subject to expert review, consultation with GWRC and Waka Katohi and other agencies just as Auckland Transport undertook in developing its Rapid Transit Baseline.

The officer also states *“Also, capacity can be easily increased by adding more carriages”* which is clearly incorrect because this requires significant infrastructure investment and such investment is not planned for the next 20-30 years. This and other statements raise questions about the depth of passenger rail knowledge held by the officer.

Paragraph 183: The officer states *“The Johnsonville Line service travels slowly, ... , but is not “quick” for Khandallah Station, Raroa Station and Johnsonville Station. For Johnsonville Station, the #1 bus service is faster and more frequent than the train, and also extends further into suburban routes.”* The AT Rapid Transit Baseline for Quick is based on the PT service being faster than the bus service. Under this criteria the service to the above stations means these would not be Rapid Transit Stops even if the Johnsonville Line was deemed Rapid Transit.

Response to Officers Section 42A Report Johnsonville Line Recommendations

The following outlines the JCA responses to specific comments in the Officer Section 42A Report 4.3.3. Summary of Recommendations

Paragraph 204. b) The JCA opposes this recommendation. If the Johnsonville Line is deemed Rapid Transit, the the Stations that are not “quick” should be excluded as Rapid Transit Stops (Johnsonville, Raroa, Khandallah).

Paragraph 204. c) The JCA opposes this recommendation for reasons outlined above.

Paragraph 204. d) The JCA opposes this recommendation. That the Johnsonville Station is **not** a Rapid Transit Stop does impact the attractiveness of Johnsonville as a place for high density housing and the justification for the larger walking catchment in the PDP.

Paragraph 204. e) The JCA opposes this recommendation. Instead the WCC and the GWRC should either adopt the AT Rapid Transit Baseline or develop their own Rapid Transit assessment stand and then, following appropriate review and consultation, apply this standard to decide which Wellington public transport services are Rapid Transit Services.

Paragraph 204. f) The JCA opposes this recommendation. Instead the WCC and the GWRC should either adopt the AT Rapid Transit Baseline or develop their own Rapid Transit assessment stand and then, following appropriate review and consultation, apply this standard to decide which Wellington public transport stop are Rapid Transit Stops.

Paragraph 204. g) The requirement for the RLTP to be reviewed in light of the update to the ONF may be out of scope but it is an essential action needed to progress the PDP.

Areas A, B, C and D are not accessible

In 2013, the JCA appealed District Plan Change 72 to the Environment Court. Part of the JCA appeal was that two specific areas of the proposed Medium Density Residential Area were not “walkable” due to poor accessibility.

In making the Johnsonville catchment larger, the Council has ignored a judgement by the Environment Court in 2013 that two areas (Areas A and B included in the JCA’s original submission on the Draft District Plan) should not be included in the 10-minute walking catchment for the Johnsonville. These are the comments the Environment Court judge made in his judgement about Area A:

“The portion of MDRA 2 east of the motorway

(56) The Disraeli Street subway is a very different beast. The pathway descending down to its eastern portal from the residential street above is both lengthy and steep, interspersed with several flights of dauntingly steep, shallow and poorly formed steps. Even the reasonably fit would find carrying shopping up the road above a stern challenge, and anyone with mobility issues, or pushing a baby buggy, or accompanied by small children, would find it impossible for practical purposes. For most people and for most purposes, day-to-day access to and from this part of Johnsonville and the Town Centre by this route is not a really practical proposition.”

The judge also noted the following about Area A:

“(57) The other issue is that of land availability for medium density development. It needs to be understood that Sheridan Terrace and Cresswell Place are recent, and current, housing developments. The lot sizes appear to be no greater than the modern standard, single dwelling, lots – far from the fabled suburban quarter acre of 50 or 60 years ago. Moreover, the buildings on them are modern single unit houses with reasonably substantial floor plates, occupying a substantial part of the usable lot. The prospect of them being re-developed as multiple dwelling lots at any time in the foreseeable future is negligible”.

In respect to Area B (Middleton Road) The judge made the following comments::

“The portion of MDRA 2 at the corner of Middleton and Helston Roads

(58) This piece of the MDRA 2 comprises five existing lots containing houses of varying sizes and quality. The Abolins property (see para [11]) is one of them. The properties front onto Middleton Road, opposite the knoll on which stands the prominent Anglican Church. The rear of the properties back onto the on-ramp to the motorway at the northern end of the Town Centre. To the south of the properties is the western end of the bridge carrying Helston Road across the motorway and its onramp. Helston Road, Moorefield Road, Ironside Road, Basset Road and Middleton Road intersect at, or very close to, a large roundabout in front of the southernmost of the MDRA properties. Anyone leaving any of these MDRA properties on foot and wishing to get to the Town Centre is faced with either crossing Helston Road on or near the roundabout, then Moorefield Road (where there is presently a zebra crossing) then re-crossing Moorefield Rd (where there is another zebra crossing near the medical centre). Alternatively, there is a yet longer and more fraught route crossing Middleton Road, Basset Road and Ironside Road (none of which have

crossings). In non-peak traffic periods, these routes might well be doable within 10 minutes, but at peaks it is not hard to imagine them taking at least that, if not longer. At either time, those with mobility issues, or managing a baby buggy or small children would also find this route difficult and even harrowing.

(59) We understand that this block of properties was not originally considered for MDRA status, but became so at the suggestion of the then owner of the property at 8-10 Middleton Road, over which a resource consent for a multi-unit development is now pending”.

The judge then summarizes his decision as follows:

“(62) We but have come to disagree, for the reasons we have attempted to set out, with the decisions about the area to the east of the Motorway and the small area at the Helston Road/Middleton Road intersection.

(64) for the reasons we have set out, we do not consider that the two proposed MDRA areas, east of the Motorway and at the corner of the Helston and Middleton Roads, meet the tests we set out at para [15], and they should not form part of the Plan Change”.

The Environment Court Judge, who walked Areas A and B, completely rejected Council officer advice that these areas should be included in the walkable catchment for Johnsonville.

The Wellington City Council did not appeal the Environment Court’s judgement.

Regarding Area C, the JCA would like to set out the following reasons why this area should not be included in the walkable catchment for Johnsonville:

- a) The start of Area C is right on the edge of the MDRA catchment that was agreed with the Wellington City Council in 2013,
- b) To proceed into Area C one has to walk up a very steep road (Frankmoore Avenue) from the intersection of Philip Street and Frankmoore Avenue. The walk up Frankmoore Avenue has a narrow footpath on only one side of the road.
- c) At the top of Frankmoore Avenue one then turns left onto Prospect Terrace which is a gradually rising road. Prospect Terrace has no footpaths on either side of the road.
- d) There is a blind bend on the corner of Frankmoore Avenue and Prospect Terrace. This means that motorists can turn the corner and hit walkers on the road on Prospect Terrace.
- e) Those with mobility issues, or managing a baby buggy and or small children would also find this route difficult and even harrowing.

In relation to Area D, the JCA would set out the following comments about this area:

- a) At the time of the JCA Submission to the PDP, the area in and around Neville Street was zoned to have higher height limits than the rest of the outer suburban area even though it was beyond the edge of the Highest Density walking catchment.
- b) All this area is now all Medium Density Zone, with the same lower height limits, and so the JCA does not have an issue with this area.

Section 42A Report Recommendations

Paragraphs 364-365: The JCA opposes the officer recommendation to retain Areas A, B and C as High Density housing and requests they be zoned and MDRZ.

Has the Johnsonville Walkable Catchment Been Set Correctly?

Outlined below is an up to date summary of the key information that needs to be considered when assessing what is an appropriate walkable catchment for Johnsonville. **In 2012/13, the Wellington City Council assessed the walkable catchment for medium density housing for Johnsonville.** This catchment was mapped and labelled by the Council as the **MDRA (Medium Density Residential Area) for Johnsonville.** That **walkable catchment was a 10 minutes walkable distance from the centre of Johnsonville** i.e. from the centre of the Johnsonville Mall. **The Council presented this as the 10 minutes walkable catchment for Johnsonville as their evidence** in a court case with the Johnsonville Community Association in the Environment Court in 2013. **In line with international best practice – 10 mins.**

In releasing it's Spatial Plan for the city in 2020, **(check 2019)** the Wellington City Council **made the Johnsonville walkable catchment massively larger** so that the 10 minutes walkable distance from the centre of Johnsonville no longer applies. This **new catchment** was also mapped and **labelled as the MDRZ (Medium Density Residential Zone) for Johnsonville.** That new walkable catchment **is now a 15 to 20 minutes walkable distance from the centre of Johnsonville** i.e. from the centre of the Johnsonville Mall. **Nothing**, of a material nature, has been done by the Wellington City Council **to improve the walkability of this extended walkable catchment since** the court case in the Environment Court in **2013.**

The NPS-UD (National Policy Statement – Urban Development 2020) states that the measurement of the walkable catchment has to be from the edge of the metropolitan centre. However, the related Ministry for Environment Guidance document also states:

5.5 Walkable catchments

A walkable catchment is the area that an average person could walk from a specific point to get to multiple destinations. A walkable catchment of 400 metres is typically associated with a five-minute average walk and 800 metres with a 10-minute average walk. These distances are also affected by factors such as land form (eg, hills take longer to walk up and can be an obstacle to walking), connectivity or severance (eg, the lack of ease and safety of crossing roads, highways and intersections), and the quality of footpaths. Walkable catchments can be determined either using a simple, radial pedshed analysis or a more detailed GIS (geographic information systems) network analysis.

This aligns to the approach used by the WCC in determining the extent of Johnsonville MDRA which is a 10-minute catchment from:

- a) where a resident lives, to
- b) where a resident can get to multiple facilities within the metropolitan centre.

The Wellington City Council has not followed this simple, clear guidance. The edge of the Johnsonville Suburban zone is not “*an average person could ... get to multiple destinations*”. The edge of the Johnsonville Suburban Zone includes:

- The intersection of the Broderick Road Bridge and Moorefield Avenue
- The Z Service Station on Johnsonville Road
- A Funeral Home

In all cases, the average person would have another 5 minutes’ walk from the edge of the zone to get to most facilities such as the supermarket, Pet Store, Doctors or Mall.

The walkable catchment for Johnsonville should be the same as the MDRA for Johnsonville that was agreed in 2013. The effect of that MDRA, as that walkable catchment for Johnsonville, is that catchment walking distance for a Johnsonville resident **entails the following walk distances**, approximately, on average:

- a) a walk of 5 minutes from where the resident lives to the edge of the Johnsonville metropolitan centre, and
- b) a walk of 5 minutes for the resident from the edge of the Johnsonville metropolitan centre to any one of the multiple facilities within the metropolitan centre.

The latter, i.e. (a) and (b), is a sensible 10 minutes walking catchment distance for Johnsonville residents.

The metropolitan centre for Johnsonville is not great. The metropolitan centre is run down, the mall re-development has been stalled for years, key anchor clients have been lost from the mall, and there has been a reduction in banking services. The WCC Officers have not properly adjusted the catchment to the limited amenity of Johnsonville and guidance factors including:

2. For larger tier 2 and all tier 1 local authorities, we suggest this threshold is extended further to account for local factors that include:

- *Street layout – are the streets laid out in a grid, or well connected through footpaths and open space that permit easier connectivity?*
- *Severance – are major pieces of infrastructure or natural landscape interrupting or channelling convenient pedestrian movement?*
- *Topography – how hilly or steep an area is will affect how easy or difficult it is for people to walk within a period of time.*
- *Connectivity – are there footpaths on both sides of the roads? Is there access via pathways that run through reserves and open space? Are there pedestrian crossings?*
- *Urban amenity – what other activities, such as local retail, pharmacy or green space, exist in streets within the extended catchment that would encourage local walking activity and multi-purpose trips?*
- *Street lighting – are streets well lit, including through local footpath connections, to ensure that vulnerable groups feel secure?*
- *Passive security – are footpaths and pedestrian routes overlooked by buildings with active frontages or otherwise designed to meet the security*

needs of vulnerable groups (noting that increased density can improve passive security)?

☑ Mobility needs – is the street layout and accessible design suitable for those with mobility needs, specifically those using wheelchairs or with pushchairs, those using walking aids and other groups who may not be physically able to walk as far or as fast?

☑ Other considerations – matters such as traffic light-controlled intersections, especially those that require pedestrians to wait for multiple lights to travel across a road, means a pedestrian's travel distance in a fixed period of time will be shorter.

Wellington City Council officers have either:

- a) **misinterpreted, or**
- b) **deliberately ignored guidance**

provided by related Ministry for Environment Guidance document. The reason why the Johnsonville walkable catchment has been extended and made so much larger than the MDRA walkable catchment agreed with the Council for Johnsonville in 2013 is so that Johnsonville can be targeted for high density housing. Council officers have allowed the Council's high-density housing plans for Johnsonville to determine incorrectly the measurement of Johnsonville's walkable catchment.

Section 42A Report Recommendations

Paragraphs 362-363: The JCA opposes the officer recommendation to retain the current High Density Residential Zone for Johnsonville. It recommends the WCC review the walkable catchment and properly apply the principles outlined in the Ministry for the Environment Guidance and appropriately include the factors related to Johnsonville not being a very attractive Metropolitan Centre without a Rapid Transit Site.

Conclusion

In conclusion, the JCA asks that the Commission agree with the following recommendations and incorporate these recommendations in it's Commission report to the Wellington City Council on the Proposed District Plan:

- a) The Johnsonville Rail Line is not a Rapid Transit service.
- b) The Johnsonville and Raroa Train Stops are not Rapid Transit stops.
- c) Areas A, B and C be removed from the High-Density Residential Zone walkable catchment for Johnsonville.
- d) Note that Area D does not require any action from the Commission for reasons set out earlier in this report.
- e) The 10-minute walkable catchment for Johnsonville should be the MDRA (Medium Density Residential Area) that was agreed by the JCA with the Wellington City Council in 2013.

Warren Taylor
on behalf of the Johnsonville Community Association