

HEARING STREAM 1: STRATEGIC DIRECTION

WRITTEN SUBMISSION OF JULIE PATRICIA WARD (SUBMITTER 103)

For hearing on 22 February 2023 at 1.30pm

INTRODUCTION

1. The suburbs along the Johnsonville Line have been are being treated differently from most of the Wellington Outer suburbs in the Proposed District Plan because expert officers in the section 42A report contend the Johnsonville Train service (JVL) is a rapid transit service despite the Council having resolved it is not. The s42A report does highlight that classification of the Johnsonville Railway line is respect of 'rapid transit' under the NPS-UD as a key issue under the National Direction Stream.
2. I am one of the authors of the paper referred to in paragraph 191 of the Section 42A report and appended to the report as Appendix D which analysed JVL against the very thorough Auckland Transport Rapid Transit Baseline criteria that have been set out and agreed upon between Auckland Transport, Auckland Council and Waka Kotahi. The Rapid Transit Baseline sets out the only clear criteria in a New Zealand context of what constitutes a Rapid Transit Service. We concluded the JVL service did not meet the "frequent, quick, reliable and high-capacity" requirements of a rapid transit service set out in the NPS-UD. I would be pleased to answer any questions the Commissioners may have about the matters raised in the paper.
3. I have read the section 42A report and various expert evidence. Mr Wignall and Mr Helm in particular support the conclusions I have reached as a lay person who has taken time to familiarise myself with the JVL service. The evidence does not support JVL being recognised as a "rapid transit service" triggering high density around the stations it serves.
4. The Proposed District Plan contemplates significant loss of amenity for the place that I call home, and hope to call home for the rest of my life. Such loss of amenity should be in service of the objectives and policies of the NPS-UD. I consider the high density upzoning proposed works to defeat Objective 8 of the NPS-UD. The section 42A report and the expert opinion of Mr Helm state permitted high density based upon JVL being a rapid transit service will not

affect housing affordability or competitive land and development markets in the City (NPS-UD Objective 2). It follows from this that it will not enable more people (Māori or otherwise) to live in the suburbs along JVL thereby failing to meet Objectives 3 or 5. In addition, the section 42A report suggests the achievement of Objective 6 of the NPS-UD requires less rather than more development at least until 2040 in order for development to be integrated with infrastructure and funding decisions. Overall, the NPS-UD objectives are at best not achieved and at worse defeated by the Proposed District Plan provisions in respect of the suburbs along JVL.

5. Similarly Walkable Catchments must be set in service of the objectives and policies of the NPS-UD. I discuss Walkable Catchments in relation to suburbs along JVL from para 30.
6. The crux of my submission that intensification of the suburbs along the Johnsonville Line, including Khandallah which has been my home for over thirty years should be “right-sized” in service of the goals and policies of the NPS-UD taking account of the transport and other infrastructure available now, and planned and budgeted for in the future. This requires an acknowledgement that from a transport perspective there are two single lane roads, (Onslow Road and Ngaio Gorge Road) which run through steep, slip prone terrain without potential for widening, out of Khandallah, Ngaio and Crofton Downs to the CBD, and one single track railway with a current capacity of fewer than 2000 people per hour. There are no plans nor budget allocations make any capacity or speed improvements to JVL. What we see now is what we get irrespective of future demand.
7. JVL is a good secondary public transport service which runs on timetable broadly equivalent to a standard bus service. It provides a useful commuter service for those who work in the CBD north of Stewart Dawson corner and it also provides a good multi-directional service to Raroa Intermediate School and to various public and private secondary schools. JVL is not a rapid transit service that will support high density Transport Oriented Development (TOD).
8. I would like to reiterate one point from our paper (see para 2 above):

“For those boarding to commute to a destination within a ten-minute walk of Wellington Station at peak time JVL service at Crofton Downs, Ngaio and Awarua Street stations the service meets the quick criteria. For those travelling Simla Crescent the service is equivalent to driving or taking the bus. For those travelling from Box Hill, Khandallah, Raroa and from Johnsonville the bus or driving is a superior option.

At all other times and to most other destinations that people need such as hospitals, city shopping, universities and leisure activities, as well as workplaces more than a ten-minute walk from Wellington Station, JVL is decidedly inferior to bus, active or car alternatives as the alternatives provide direct service without changing modes."

9. In 1934 it was recognised that "an important decision with which the authorities (were faced was) the fate of the railway line to Johnsonville, which (would be) isolated by the new tunnel deviation to Tawa Flat. When construction of the new line was started it was apparent that the future of the old line would present a difficult problem." (Dominion, Volume 27, Issue 308, 25 September 1934, Page 6) Retrieved from:

<https://paperspast.natlib.govt.nz/newspapers/DOM19340925.2.31>

10. JVL is still exercising our minds almost a hundred years later.

11. The article above went on to say:

"The attitude of the committee is based on the assumption that the Railways Department will not wish to continue operating the line as a branch with steam locomotives, and, although the three suburbs are served by excellent bus services in addition to the railway, residents fear that buses could not cope with the traffic if the trains ceased without an increase in the fares to pay for the extra buses which would be necessary to carry the rush-hour crowds (at present a great proportion of the rush traffic is carried by trains), but which would be idle for a great part of the time."

12. Even in 1934 it was recognised that the train was a complementary service to buses which assisted in moving peak hour loads but was not of itself a good enough service to meet all the transport needs of residents. The problem of services being idle or underutilised for much of the day has not really changed, nor has the frequency or capacity of the service.

13. Intensification beyond the capacity of public transport will be counterproductive to the overarching goals of the NPD-UD and the District Plan to enable a reduction in the need to travel via private vehicle and reduced carbon emissions. This is also Mr Helm's expert opinion. He concludes: "More housing around the JVL line at the expense of elsewhere appears counterproductive to the goals of a compact city with lower private vehicle use."

<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/01/submitter-evidence/submitter->

14. I am not an expert. I am just a regular person who has lived near JVL for 34 years. I am relating my lived experience to help Commissioners understand why, even though I live within the proposed walkable catchment for the Johnsonville train service (JVL), I have never been a regular user of the train. I am also providing this information to demonstrate that I come from the experience of having enthusiastically embraced walking, cycling and public transport during different stages of my life.
15. I hope my story will prompt you as Commissioners, and other submitters who have great faith in the greater potential of JVL, to reflect upon the ages and stages in every person's life journey, and consider whether for many of those stages the service provided by JVL can be a meaningful car replacement service. There are many parents with young families who live near me. Their lives are extremely busy and I have been told by many that they have not had time to engage in this process. They are living now the life I lived when I had young children but seem under even more pressure than I experienced at that stage of life. Among other things I am trying to add their voices and the voices of future families to this conversation.
16. 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."
17. The next increment for suburbs along the Johnsonville Line is three storey buildings covering up to 50% of a site. This is precisely the change enabled by the Medium Density Residential Standards (MDRS) and in my view this change creates the framework under which demand for new housing brought about by even the most ambitious projected population growth over the next thirty years can be met.

MY BACKGROUND

18. 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.

19. What have been my transport choices through my life to date and what has driven them?
20. I spent my first ten years on a farm, the nearest towns were 47km to the north or 50km to south on a mixture of sealed and unsealed roads. My family travelled to a town by car about once a month to get in the grocery items that my parents could not produce on our farm. I began my education with the Correspondence School so there were no transport choices to be made.
21. From the age of seven I was driven 7 kilometres to a bus stop which was half way to school and I took a school bus for the remaining 7 kilometres. My first years of schooling were accessed by bus public transport.
22. In 1970 we moved to a town, for the rest of primary school and all of secondary school I either walked or biked to school rain or shine. Active modes were my predominant transport modes for the next fifteen years.
23. I left the small town to attend university in Christchurch in 1979. During my first year in a hall of residence I walked, or used the bus to travel in the city beyond the immediate environs of the university. For the rest of my university years and my first years working in Christchurch I cycled almost exclusively.
24. I got a driving licence when I was 22 years old, seven years after an ill-fated first lesson at age 15 but I did not enjoy driving and generally avoided it wherever possible.
25. In 1986 I embarked on the rite of passage known as OE. I lived and worked for two years in London and during that time I travelled every day to work by underground and bus. Most social travel was also on the tube.
26. On arrival in Wellington, I shared a morning car trip to a carpark on the edge of the city, and walked to work at an office on Willeston Street. My spouse generally worked later than me so in the evening I caught the bus home either from Stout Street, or later Brandon Street. At that time there was little shelter beyond the end of Featherston Street and the weather could be very vicious. On one occasion I recall my glasses being blown off my face as I waited for a “walk now” signal at the corner of Featherston and Whitmore Streets. I lived opposite Box Hill station on JVL but the extra walk to Wellington Station meant JVL was to me the second-best option.

27. In 1992 I gave birth to my first child. Now I had another person to get places other than myself and by the end of 1995 I had three such people under five years old. This changed my whole perspective on transport. I was no longer one person trying to get from A to B. As my children grew, I was one person trying to get myself plus three other totally dependent people from A to B and C and D often with a baby buggy, backpacks, and a load of groceries in tow. The locations I needed to access were many and varied and time sensitive. More often than not, were not on the train route nor a bus route.
28. Once my children were of an age to be allowed to stay at home alone and we did not have to always leave home as a team, I returned to walking to do small errands in Khandallah Village. I still needed to drive to do the family shopping and to ferry teenagers to various sporting activities and lessons which occurred throughout the city.
29. 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.”*
30. Even when I was a worker in the CBD and lived opposite Box Hill station the JVL service was second best. When I had dependent children to transport for the most part public transport was not an option at all as it could not get me and my children to the places we needed or wanted to go in a timely fashion, or in many cases at all. I did however try to arrange my children’s extracurricular activities in such a way that there were usually four of us in the car and where possible I carpooled with other parents.

31. I now find myself fairly much retired. I have very little need to travel to the CBD and certainly not to the area near Wellington station, so I find the train is not really useful to me. I walk to the local shops almost daily as I have the time to do so, groceries for one or two meals for one or two people aren't very heavy, and I don't have dependents or work making claims on my time. All these factors enable that choice. It is not a choice busy working families can so easily embrace.
32. I even walk to the CBD on occasion. When the buses were reliable, I would often bus to the city to eat out, or to attend a movie or show. Most recently many evening buses from and to Khandallah have been cancelled so I have had to use the car. I would say on average I drive about once a week. If I was to use public transport my destination would be well beyond Wellington Station and I would choose the bus. I am a walker. I have never been a cyclist in Wellington as I consider the terrain and the weather beyond my abilities. I have enthusiastically embraced public transport during different stages of my life and will continue to do so if it meets my needs but the best mode for me remains the bus. This is not to say the train serves no purpose, but it a supplement or complement to the bus services not a rapid transit service.

WALKABLE CATCHMENTS

33. Walkable catchments should be set in service of the goals and objectives of the NPS-UD. I am familiar with the concept of Transport Oriented Design (TOD) which is predicated on such things as:
- a train station as prominent feature of town centre;
 - a public square fronting train station;
 - a regional node containing a mixture of uses in close proximity (office, residential, retail, civic);
 - collector support transit systems including streetcar, light rail, and buses, etc;
 - designed to include the easy use of bicycles and scooters as daily support transport;
 - large ride-in bicycle parking areas within stations;
 - bikeshare rental system and bikeway network integrated into stations;
 - reduced and managed parking inside 10-minute walk circle around town centre / train station;

- specialised retail at stations serving commuters and locals including cafes, grocery, dry cleaners. (Characteristics sourced from <http://www.tod.org/>)

34. Following are an aerial photo of Box Hill Station from the Proposed District Plan and one taken by me on 11 February 2023. Box Hill is fairly typical of the stations on JVL. None of the features of TOD are there. I challenge anybody to work out how all, or indeed any, of the features of transport-oriented development outlined in paragraph 27 can possibly be incorporated into this space. To me the station has all the characteristics of a bus stop but the “train/bus” that stops there can fit a few more people than a double decker.





35. Neighbourhood centres and some isolated shops are already established in Khandallah, Ngaio and Crofton Downs. If you were to draw a circle in a five hundred metre radius of the supermarkets at Crofton Downs, Khandallah and Johnsonville, and another circle within five hundred metre radius of the train stations on the Johnsonville Line, only Crofton Downs, Box Hill and Johnsonville stations would fit within both circles and in the case of Crofton Downs and Box Hill many people would have to retrace their steps after a trip to the supermarket in order to reach their homes.

36. For those stations that are not within 500 metres of a supermarket the distances are:

- Khandallah 800 metres
- Simla Crescent 900 metres
- Ngaio Station 1100 metres

- Raroa 1200 metres
- Awarua Street 1600 metres

If your home is 500 metres from the station but in the opposite direction from services then you are in for a very long walk.

37. As an example, consider the position of a person living at 53 Amapur Drive, a random address I have chosen to illustrate the problem. On the following pages are a map, and a time and distance estimate sourced from Google maps. As I understand the concept of TOD our commuter should ideally be able to get off the train and access groceries at the station and then proceed to walk home. Our hypothetical commuter lives within ten minutes of a JVL station but would have a 32-minute walk if they needed to divert to the supermarket on their way home. They could travel to Box Hill, walk to the supermarket, walk back to Box Hill and wait for a train (which will only arrive every fifteen minutes) and take the train 500 metres back to Simla Crescent Station and then walk home up the hill but that feels theoretical rather than practical to me. My example illustrates that the theory of TOD can't be met in practice and the chance of a services relocating from their present locations to the stations on JVL to realise the benefits of TOD seems to me quite improbable.



Simla Crescent Station (bus stop), Khand



New World Khandallah, 26 Ganges Road,



51-53 Amapur Drive, Khandallah, Wellingt



Add destination

Options



Send directions to your phone

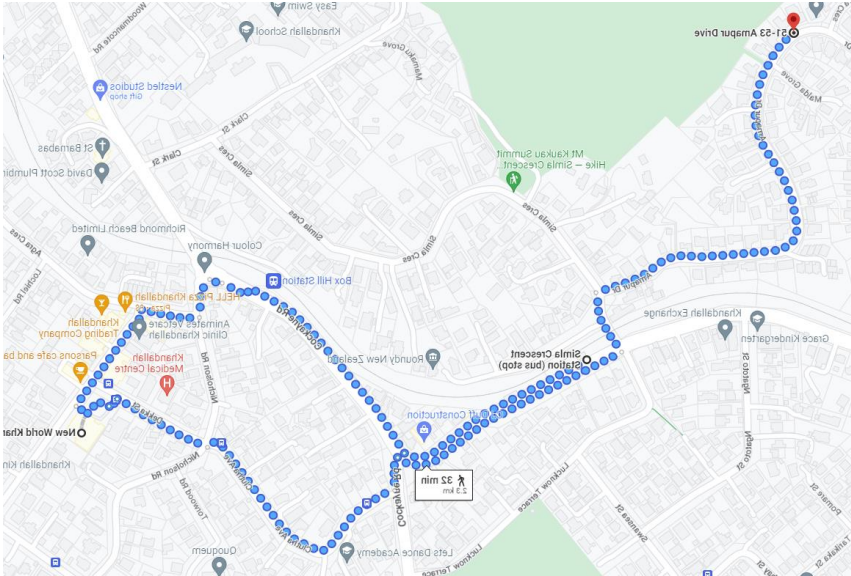


via Khandallah Rd and Cockayne Rd 32 min
2.3 km

Details

↑ 74 m · ↓ 29 m





Similar situations arise in accessing schools, childcare facilities, kindergartens and parks which need to be accessed by young children who will be slower walkers. In my view the building heights and densities should be determined commensurate with the level of commercial activity and community services within the centres along the JVL rather than on the incorrect assumption that JVL is a rapid transit service

AMENITY AND ADDRESSING THE DREADED “N” WORD: NIMBY

38. Throughout the process of getting the plan to the stage it is now, the term “NIMBY” signifying “Not In My Back Yard” has been bandied about. It has been suggested to me that I want to trap my suburb in amber and block any development or change.
39. The oldest houses in my street are over 100 years old while the newest are under construction with sections having been subdivided, in some cases several times, into smaller and smaller lots over time. This has enabled more people to live in and enjoy the amenity of the neighbourhood. Additional detached houses and duplexes having been built in almost every decade since 1910. While there aren’t any babies right now we do have a cross section of ages and households – families with primary, secondary and tertiary aged children, young professionals, empty nesters and single elderly.
40. To suggest an attempt is being made to set the area in amber is not borne out by these facts. On a personal note, I have had to occasion to ask neighbours to agree to works in excess of District Plan requirements and two of my neighbours have likewise had to seek my consent, in all cases amicable consent without question or dispute has been given and received. My

neighbours and I have welcomed the gradual development in our street, which has overall revitalised and improved the community and allowed more people to live here and enjoy the amenity of the neighbourhood while sustaining the amenity for existing residents.

41. Section 7 of the Resource Management Act requires (among other things) that

“all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to the maintenance and enhancement of amenity values.” The section has not been amended or repealed so despite Objective 4 of the NPS UD stating amenity values might develop and change over time there is still a requirement so far as possible to maintain and protect amenity values rather than reduce and diminish them.

42. The report the Council commissioned on amenity (<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/plans-and-policies/a-to-z/spatial-plan/planning-for-residential-amenity-report-july-2021.pdf>) specifically excludes the “character of existing areas” in its assessment, modelling only sun and natural light to indoor and outdoor living space, privacy between habitable spaces and scale, and dominance, as if it that is the sum total of amenity. I would contend that things like reduction of existing solar orientation, the degree of privacy lost, outlook, terrain, proximity to services, green spaces and schools, opportunities for community recreation as well as the quality of public transport, all contribute to amenity and affect a person’s attachment and commitment to their environment and how much they are is prepared to pay for a property in a particular environment.

43. The Johnsonville Line runs along a valley floor and the slopes to the south of the line have a sunny aspect to the northwest. Successive residents have appreciated that they live in an environment comprising north facing slopes. Over time considerably and thoughtfully placed structures have been placed to afford maximum sunshine hours, privacy and a pleasant outlook for most residents. Gardens and tree plantings have created a streetscape which is can be enjoyed by anybody, not just the owners of the gardens. Most houses have garages resulting in available street parking for contractors and visitors. The section 42A report states that prices suggest the suburbs around JVL are highly desirable to live in (para 166, p. 46). I would suggest the desirability can be attributed to current level of overall amenity of which the availability of reasonable public transport is but one element.

44. Since development began residents have acted in the collective interest to ensure new residents could best use the topography to enable a sunny aspect for new homes without unduly curtailing the sunlight access and privacy of existing homes. This pattern of development can continue under the MDRS providing new housing choices for future generations while maintaining and enhancing amenity for everyone present and future. Paragraph 92 of the section 42A report “The NPS-UD makes clear that growth must occur and that change in amenity values will happen (Objective 4). It further states that this change may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types and are not of themselves and adverse effect (policy 6). The built form standards of the plan seek to ensure a balance of amenity and growth for both existing and future residents in accordance with the NPS-UD.”
45. The approach of placing six storey buildings at the bottom of a valley will in particular gift the amenity of sunlight and privacy to a privileged few in a tall apartment building at the expense of the many. Large trees and gardens will inevitably be lost in the process. In my view developing incrementally as has been done throughout the history of the suburbs along JVL, can offer plenty of opportunity for enhanced amenity through increased and varied housing densities and types while maintaining to the greatest extent possible the amenity of existing residents.
46. Mr Wharton at paragraph 45 of the Section 42A report <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/01/hearing-stream-1-section-42a-report-part-1-plan-wide-matters-and-strategic-direction.pdf> p.163

states:

“Based on this assessment, in my opinion: whether the Johnsonville Line is classified as rapid transit or not, will not affect housing affordability or competitive land and development markets in the City, at least based on the current construction costs and prices for high density housing.”

47. I would have thought that if there is to be significant diminution of amenity for existing residents then such diminution should be in the service of achieving the objectives of the NPS-UD and Mr Wharton’s statement concludes Policy 2 of improving affordability by supporting competitive land and development markets in Wellington City will not be

positively impacted whether or not JVL is a rapid transit service. Those threatened by impaired amenity deserve the benefit of the doubt. In addition, Mr Helm's evidence <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>

at para 90 p. 16 agrees with Mr Wharton "Zoned capacity for population growth is mostly due to the new Medium Density Residential Standards (MDRS). Further NPS-UD upzoning based on a rapid transit service classification would have only a small impact on development capacity."

48. If the MDRS effectively enables the bulk of the growth in the suburbs along JVL then I submit objectives 1, 3, 4, and 5 of the NPS-UD are met by applying upzoning to the MDRS level and that zoning for High Density unreasonably reduces amenity without making any additional contribution to meeting the objectives of the NPS-UD. Even MDRS upzoning increases an already significant probability that the upzoning will run counter to objective 8. The section 42A report highlights at para. 170 that infrastructure upgrades for the urban areas around the other Johnsonville Line stations, other than Johnsonville, are not scheduled to occur until 2031-2040. "In the interim, the Proposed Plan's Three Waters Infrastructure chapter (has to ensure) that development only occurs within the limits of available three waters capacity, which is summarised in the table (on page 48)."

49. The table shows that water supply is adequate at best; waste water pipes are in poor condition for all of Khandallah, Ngaio and Crofton Downs in addition to being under capacity for Khandallah. The situation regarding stormwater appears to indicate the need for duplication existing stormwater provision in Khandallah and Crofton Downs and that flood prevention works needed in Ngaio. This indicates achievement of Objective 6 of the NPS-UD requires less rather than more development at least until 2040 in order for development to be integrated with infrastructure and funding decisions.

CONCLUSION

50. In keeping with the Strong Towns philosophy which I referred to in paragraph 11 above I would advance the premise 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.”

51. Johnsonville itself has been classified as a metropolitan centre but it is my submission the remaining suburbs along JVL fall into Policy 3(d) of the NPS-UD. The building heights and densities of urban form within and adjacent to the neighbourhood and local centre zones along JVL should be commensurate with the level of commercial activity and community services within the centres. I will leave the detail of appropriate centre classifications and appropriate heights to be addressed in the Centres stream.