

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

JCA Presentation for Stream 9

Introduction

Good morning Mr. Chairman and Commissioners,

I would like to start by **again introducing** Mary Therese and myself, Warren Taylor, from the Johnsonville Community Association (JCA).

The following is the Presentation of the Johnsonville Community Association Incorporated (JCA) for Stream 9 to the Hearing Panel on the Proposed District Plan for 2024-2034.

A Problematic Transport Hierarchy for Johnsonville

On page 26 of the Section 42A Report on Transport, the Council outlined its Transport Hierarchy for planning the development of the city. At the top of that hierarchy is walking, then cycling together with micro mobility (scooters, etc), and then public transport.

The heroic assumption within this Transport Hierarchy is that Johnsonville residents will either walk, or cycle, or take a scooter from Johnsonville to Wellington city and similarly return to Johnsonville on a daily or regular basis.

Walking from the Nada Bakery on Johnsonville Road to the Mojo Coffee House at the intersection of Willis Street and Lambton Quay is 9.0km and will take over 2 hours¹ Given this fact, walking between Johnsonville and the city and returning is simply delusional urban planning. This delusion completely ignores the fact that residents value their time. Pointedly, there is no evidence whatsoever that Johnsonville residents are walking to the city and back. None. Not today nor will there be 100 years from now.

In other words, walking is an alternative for short journeys within a suburb, but is not a viable alternative for Johnsonville residents working in or needing to visit Wellington, or indeed the Hutt Valley or Porirua which are other common destinations.

Cycling has increased from Johnsonville to the city and return but it is still a trickle compared to car and public transport usage. The cycleway, located on the each side of Ngauranga Gorge, is **not** an attractive place for Johnsonville residents to cycle. Most cyclists like to cycle on roads that are not steep, busy and next to high speed traffic. Ngauranga Gorge is part of State Highway 1, has a maximum speed limit of 80kph, and the cycleway has 3 separate roads that turn of SH1 and across the cycleway. This is a potentially dangerous cycleway because of these factors with plans to make it safer now on hold. It is fairly clear that the vast majority of Johnsonville residents are not attracted to taking up cycling on the cycleway because of the Ngauranga Gorge factor.

In terms of scooters, I have yet to see anyone using a scooter on the Ngauranga Gorge cycleway.

¹ Estimate according to Google Maps

In summary then, the number of residents either walking, cycling or scooting from Johnsonville to city and returning is between non-existent to very low and high quality public transport is the only viable alternative to car travel. This makes it imperative that Johnsonville's public transport system is top notch in order to contributing towards reducing the city's CO2 emissions.

We would also note that the suitability of walking, cycling and scooters for getting around Johnsonville is dubious in some cases given the hilly nature of the suburb and the wet and windy environment.

Equally important is the assumed priority of walking, cycling and scooters for travel by persons with significant disabilities is not mentioned let alone highlighted. Pedestrian paths and accessways suitable to support travel by the many reliant on wheelchairs, walking sticks and mobility scooters is essential for an accessible urban environment. The provision of accessible car parking and accessible public transport is another key element needed in the District Plan.

Johnsonville's population is planned to be heavily densified and increased by 60% from 10,000 to 16,000 residents over the next 30 years. The clear intent from the NPS-UD is that railway lines that may be able to support the commuting needs of densified communities, such as Johnsonville, should have railway lines assessed as to whether they meet rapid transit service criteria set out in the NPS-UD.

But the Council, supported by Minister Chris Bishop, have incorrectly classified the Johnsonville Rail Line as a rapid transit service.

The JCA views the Minister and Council's decision as a political decision and we support the Commissioners considered decision that the Johnsonville Line is **not** a Rapid Transit Service as outlined in the Commissioners Report to the WCC Environment and Infrastructure Committee of 14th March 2024:

3.3.4 Overall Finding- Rapid Transit or Not?

227. As above, our finding is that the Johnsonville Rail Line does not meet all of the criteria in the NPSUD, and that there are good arguments that it fails a number of the criteria.

228. As against that, a number of parties pressed on us the need to facilitate intensification in the western suburbs served by the Johnsonville Rail Line. Mr Marko Garlick for Generation Zero suggested to us that the requirement for a rapid transit service merely fulfils the role of a proxy to identify areas suitable for intensification.

229. By contrast, Mr Wharton, correctly in our view, told us that it was not appropriate to assess whether the Johnsonville Rail Line was a rapid transit service by reference to the appropriateness of intensification along the corridor 117.

...
232. In summary, we find that the Johnsonville Rail Line is not a rapid transit service for the purposes of the NPSUD Policy 3(c).

3.3.5 Consequences of Our Finding

233. If the Johnsonville Rail Line is not a rapid transit service, as we have found, that removes the requirement in NPSUD Policy 3(c) to define a walkable catchment around the stations on the line between the Wellington Railway Station and the Johnsonville Railway Station.

The Commission knows that this assessment is not correct because of the very strong counterfactual evidence given to it by a range of independent transport experts including Waka Katohi.

Exacerbating this situation is the fact that there are no plans from the Council, nor Waka Katohi or GWRC either in the next 10 years, let alone 30 years, to upgrade the Johnsonville Rail Line.

In his report for Stream 1, Dr. Tim Helm warned the Council that if densification proceeded without a significant upgrade to the Johnsonville Rail Line to address residents commuting needs there would be significant increase in congestion on the Northern Motorway coming into Wellington. This would obviously also increase CO2 emissions for the city.

This leaves Johnsonville with a massive problem. It doesn't have a rapid transit service to meet the commuting needs of its residents as densification is implemented in Johnsonville.

For Johnsonville to meet the over-arching requirement from the NPS-UD that densified communities must be well-functioning urban environments, this commuting need issue must be addressed. Otherwise the Wellington City Council will have failed to fulfil its fiduciary duty of care to Johnsonville residents. The commuting best interests of Johnsonville residents, both current and future, have simply not been genuinely considered by the Council nor Minister Chris Bishop.

It is supremely ironic that the Wellington Council wants to highly densify Johnsonville and that the Transport Chapter doesn't even have a single chapter about Rapid Transit Bus and Train Services to address the commuting needs of Johnsonville Metropolitan Centre residents.

Accordingly, the JCA requests the support of the Commission that a rapid transit bus service be developed for Johnsonville Metropolitan Centre residents, both current and future, travelling to and from Wellington.

Recommendations

1. The limitation of active mode travel for long distance and steep terrain travel needs to be specifically recognised in the Transport section Introduction.
2. The critical importance of high-quality public transport long distance and steep terrain travel as well as travel by the disabled needs to be specifically recognised in the Transport section Introduction.
3. The JCA requests the Commission support the JCA's recommendation to the WCC that:
 - a. The Transport Chapter in the Council's District Plan include a new section titled Rapid Transit Bus Services for Wellington City's Metropolitan Centres, and
 - b. The Rapid Transit Bus Services section requires the provision of rapid bus transit services for Wellington's metropolitan centres that meets the criteria for rapid transit services as set out in the NPS-UD, and
 - c. Assessment as to whether the rapid bus transit services for Wellington's metropolitan centres meets the NPS-UD criteria for rapid transit services should be made by transport experts who are independent of the Council, and
 - d. The findings of those independent transport experts are to be made publicly available to Metropolitan Centre residents.
4. The JCA requests the Commission to consider whether to ask Waka Katohi to reconsider its plans for the Johnsonville Rail Line in respect of the following:
 - a. Double tracking the entire length of the Johnsonville Rail Line, and
 - b. Increasing the frequency of peak and off-peak services, and

- c. Thereby turning the Johnsonville Rail Line into a true, real rapid transit service.

Related Transport Issues:

Walking Definition Issue

The JCA strongly disagrees with the Council officer's position, in paragraph 119, that the definition of walking needs to be changed from that of *physical exercise* to that of *physical effort*. Our objection to this proposal is based on comments made to Commission by a Council officer that a hilly walkable catchment was *doable* and *does take some effort* – the Commission's Report 1A refers. The Council officer's comment in paragraph 119 that "*Physical exercise*" implies a specific focus on structured fitness activities is just nonsense. Many residents walk regularly which has got nothing whatsoever to do with structured physical fitness activity.

The concern here is that the real reason for this change in definition is to get residents used to strenuous physical effort to walk up more hilly walkable catchments in the city. It is like the Council officer has simply not learned anything about what is a sensible walkable catchment from the Stream 1 hearings.

In short, the definition of walking should remain as a form of transport that involves physical exercise rather than physical effort. Accordingly, walking should have its own definition and not be subsumed within the Active Transport definition.

The JCA wants to make the following recommendations in relation to the Council officer Recommendation in HS9-TR-Rec4 in paragraph 122 of the Section 42A Report.

Recommendations

5. The JCA requests the Commission support the JCA's recommendation to the WCC that:
 - a. Walking should not be included in the definition of Active Transport, and
 - b. The definition of walking is: Walking is a form of transport that involves physical exercise.

Walkable Catchment Issue

As a secondary Walking Issue, JCA objects to the definition of "*walkable catchment*" in Appendix E as "*A walkable catchment consists of a maximum 20 minute average walk, or as otherwise defined in district plans*".

Hearing Stream 1 determined that a walkable catchment was 15 minutes in the central city and 10 minutes from train stations. Changing this to 20 minutes by default is therefore a considerable overreach on the part of Council officers, especially at this late state in the hearings. This is particularly an issue now that the Johnsonville Rail Line has now been classified, incorrectly, as a rapid transit service.

Recommendation

6. The JCA requests the Commission support the JCA's recommendation to the WCC that:
 - a. The definition of Walkable Catchment in Appendix E is changed to "A walkable catchment consists of a maximum **10** minute average walk, or as otherwise defined in district plans."

Cycling Issue

The JCA strongly disagrees with the Council officer's position, in paragraph 131 and 132 of the Section 42A Report, that the definition of cycling needs to be changed from requiring *muscular energy* to that of *physical effort*. Our objection to this proposal is based on the fact that riding a bike does take muscular energy and that not every resident can do this e.g. the elderly, the unfit, the disabled, very young children, riders wanting to carry shopping, etc. If you are relatively young, mobile and very fit you are more likely to have both the muscular energy and the willingness to put the physical effort in to cycle. Many other resident categories for various reasons don't have the muscular energy nor the desire to put the physical effort in to cycle. Keeping *muscular energy* in the definition reinforces to planners that not all resident categories have the necessary muscular energy to cycle. Accordingly, the JCA recommends as follows:

The JCA wants to make the following amendment recommendation in relation to the Council officer Recommendation in HS9-TR-Rec5 in paragraph 132 of the Section 42A Report.

Recommendation

7. The JCA requests the Commission support the JCA's recommendation to the WCC that:
 - a. The definition of cycle is amended as follows: means a transportation device that has at least two wheels and that is designed primarily to be propelled by the **muscular energy** of the rider to rotate pedals. It includes electric cycles.

Transport Network Issue

In the JCA's Presentation on the Wrap Up for the ISSP Work Stream, we indicated that we want the current bus hub relocated alongside the Johnsonville train station. The initial purpose here is to have a stand-alone covered, fully sheltered public transport bus and rail hub which will improve commuting experience for residents considerably. Eventually, the JCA wants that hub to be fully integrated with the Mall when that is finally redeveloped by Stride.

The definition of Transport Network in paragraph 155 needs to include fully sheltered public transport bus and rail hub facilities in its definition.

Accordingly, the JCA wants to make the following amendment recommendation in relation to the Council officer Recommendation in HS9-TR-Rec6 in paragraph 155 of the Section 42A Report.

Recommendation

8. The JCA requests the Commission support the JCA's recommendation to the WCC that:

The definition of transport network is amended as follows: means all public rail, public roads, sea freight and passenger ferries, public pedestrian, cycle and micromobility facilities, public transport **and hubs** and associated infrastructure. It includes:

 - a. Train stations;
 - b. Bus stops and shelters;
 - c. Park and Ride areas;
 - d. Rapid transit stops and shelters;
 - e. **Fully sheltered public transport bus and rail hubs: and**
 - f. Ferry terminals.

Fire Fighting Accessibility Issue

In Stream 4, the JCA provided considerable comment on the fire-fighting support issues recommended by FENZ. These issues included fire-fighting vehicle access, driveway widths, types of fire hydrants, and the need for high water pressure to fight fires in tall buildings and the need for those tall buildings to have high water pressure for their building's water sprinklers. We included in JCA's evidence an article from Stuff that outlined extremely well the adverse experiences FENZ was having fighting fires in densified urban environments in Auckland.

The JCA also particularly noted the Stream 4 evidence of Council expert witness Mr. Nick Locke who noted, in paragraphs 17 to 19 of his report, that where tall buildings and mixed with smaller buildings fire acceleration is increased significantly. Johnsonville's high density zone will mirror this building configuration as it changes from a low density urban environment to a high density urban environment. The JCA also noted that Johnsonville is a windy place. The biggest wind gust ever recorded in New Zealand was 202kph at nearby Mt. Kaukau in June 2013.

The JCA fully supports FENZ's recommendations to the Council. The JCA is very concerned about the qualifying comment (highlighted in bold) in paragraph 348 below:

*I agree with Ms Wood's support for a new standard for driveways serving buildings more than 70 m from a legal road to have unhindered fire appliance access in accordance with NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. **If developments cannot meet this because site or topographical constraints make compliance unreasonable, site-specific mitigations can be considered under TR-P3.** I recommend not including reference to "site access" in this new standard because this overlaps with the TR-S7 design requirements for on-site vehicle parking, circulation and manoeuvring discussed below.*

The Council officer's report is silent on what are these site-specific mitigations for these developments. And items 5 and 6 in TR-P3 are in direct conflict with each other as follows:

5. *Safe and effective access for firefighting purposes is provided with reference to NZS 4404:2010 and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008; and*
6. *There are site and topographical constraints that make compliance unreasonable.*

In short, this is a mess. And this is a fundamental issue. This needs to be sorted out so that public safety is the top priority, rather than developer's profit maximisation or maximum densification on a development site. The Council needs to clearly face up to what is its priority here. Surely, public safety must come first.

The JCA wants to make the following recommendations in relation to the Council officer comments in paragraph 348 of the Section 42A Report.

Recommendations

9. The JCA requests the Commission support the JCA's recommendation to the WCC that:
 - a. TR-P3 specify the mitigation steps if item 5 in TR-P3 cannot be complied with, and
 - b. TR-P3 require an assessment as to whether those mitigation steps adequately address public safety compliance requirements for a site, and
 - c. TR-P3 requires item 5 in TR-P3 to be fully complied with where public safety compliance requirements for a site cannot be met.

Private Vehicle Parking Issues

In Stream 4, the JCA provided considerable comment on the lack of adequate car parking facilities in Johnsonville so much so that, even now, cars are parked each work day on the feeder streets surrounding the Johnsonville Triangle and the centre of Johnsonville. The JCA made it very clear in Stream 4 that car parking buildings is needed in Johnsonville to address this problem even now. With densification in Johnsonville, this problem will only worsen.

Central Johnsonville is a transport hub for both buses and trains for residents from surrounding suburbs as well as Johnsonville itself. And given the hilly and windy nature of Johnsonville many local residents, as well as those from other suburbs, use and will continue to use private transport to reach the transport hubs.

Provision of suitable Park & Ride facilities in Johnsonville is therefore essential.

Johnsonville is also a Metropolitan Centre providing a range of facilities for local residents as well as those from surrounding suburbs, which also requires the provision of suitable parking facilities.

In paragraph 369, the Council officer has stated the following:

Under the NPS-UD, market demand and developer preference chooses how many car parks are provided on-site, to service car users with full and limited mobility. In places where few or no car parks are provided on-site, the NPS-UD Policy 11(b) strongly encourages comprehensive parking management plans.

The Council has **not** provided any comprehensive parking management plans for Johnsonville. The Council is relying instead upon their Transport Hierarchy which does not work successfully for Johnsonville for the reasons outlined at the start of this Presentation.

A comprehensive car parking management plan is massively needed both now and into the future for Johnsonville. This car parking management plan could form a key part of an updated Town Centre Plan for Johnsonville.

Recommendations

10. The JCA requests the Commission support the JCA's recommendation to the WCC that:
 - a. The Transport Chapter in the Council's District Plan include a new section titled Car Parking Facilities for Wellington City's Metropolitan Centres, and
 - b. The Car Parking Facilities for Wellington City's Metropolitan Centres section requires the provision of car parking facilities for Wellington's metropolitan centres in line with the requirement in the NPS-UD Policy 11(d) that requires Council's to have comprehensive car parking management plans that includes the provision of car parking facilities.

Infrastructure Issues for Johnsonville

In its Presentation to the Commission for the Wrap Up Stream for the ISSP, the JCA gave its own wrap-up on pages 5 and 6 of our Presentation. That wrap up listed a long list of transport and infrastructure projects that needed to be completed to ensure Johnsonville was ready for densification. We particularly made the point that all infrastructure shortfalls needed to be identified and fully rectified before densification was implemented. Not only is this best practice it is also consistent with the over-arching requirement from the NPS-UD that the densification of communities results in well-functioning urban environments. It is through this lens that the JCA has reviewed the Infrastructure reports for Stream 9.

Updated Town Centre Plan Issue

Johnsonville's Town Centre Plan was last updated in 2008. Given urban planning developments since 2008 and the densification intended for Johnsonville, the Town Centre Plan is considerably overdue for updating to reflect how Johnsonville as a metropolitan centre will be planned. Currently, there is a complete void in this area which cannot possibly represent best practice.

There should be a comprehensive town centre plan prepared with the involvement of all relevant stakeholders as to what Johnsonville will provide as a metropolitan centre. And, obviously, this would include important requirements like private vehicle parking facilities, high water pressure for tall buildings, green space, etc.

It is also noted that with the current delays in redevelopment of the Mall, Johnsonville is losing many businesses and without a plan to revitalise the town centre, in the very near future Johnsonville will no longer merit being designated as a metropolitan centre.

Recommendations

11. The JCA requests the Commission support the JCA's recommendation to the WCC that:
 - a. The Infrastructure Chapter in the Council's District Plan include a new section titled Updating Town Centre Plans for Metropolitan Centres, and
 - b. Town Centre Plans for Metropolitan Centres must be updated either every 5 years or prior to high urban densification being implemented, and
 - c. Town Centre Plans for Metropolitan Centres must include provision for all public transport and infrastructure including additional infrastructure (also known as social infrastructure) so that the Town Centre Plans are fully integrated to meet the needs of residents.
 - d. The end purpose of these Town Centre Plans is to ensure they help the creation of well-functioning urban environments as intended in the NPS-UD.

Additional Infrastructure Issue

In paragraph 105 of the Section 42A Report – Infrastructure for Stream 9 it states the following:

The NPS-UD introduced the term 'additional infrastructure' into the lexicon of RMA language. The definition of 'additional infrastructure' in the NPS-UD is wide, much wider than the definition of infrastructure in Section 2 of the RMA. As highlighted by Ministry of Education [400.17, 400.18], it includes social infrastructure such as schools and healthcare facilities. It also includes public open space, community infrastructure as defined in section 197 of the Local Government Act 2002, land transport (as defined in the Land Transport Management Act 2003) that is not controlled by local authorities, telecommunication networks and gas and electricity distribution networks. As such it has some, but not total, cross over with the definition of infrastructure in Section 2 of the RMA.

Paragraph 106 confirms that the PDP has only a restricted definition of infrastructure consistent with section 2 of the Resource Management Act but is not consistent with the NPS-UD which introduced the term "additional infrastructure".

So why was "additional infrastructure" added by the NPS-UD to the infrastructure requirements for densified communities? Given that additional infrastructure includes schools, healthcare facilities, public open spaces and community infrastructure it is clear that the NPS-UD intends that social infrastructure for densified communities is to be provided.

The JCA's experience with the Council through the PDP hearings has shown to us that getting the social infrastructure and local public transport infrastructure in place so that Johnsonville is ready for densification is largely a complete irrelevancy to the Council. The JCA saw this firsthand during the JCA's Wrap Up Presentation for ISSP with the Council's mainly negative response to the long list of public transport, infrastructure and social infrastructure projects.

Adding "*additional infrastructure*", and therefore social infrastructure, to INF-01 would ensure infrastructure planning for communities that are to be densified is fully integrated urban planning. Fully integrated urban planning is best practice and is completely consistent with the intent of the NPS-UD regarding social infrastructure. This is more likely therefore to lead to the development of well-functioning urban environments in densified communities.

Recommendations

12. The JCA requests the Commission support the JCA's recommendation to the WCC that INF-01 includes the following additional objectives:
 - a. Infrastructure in INF-01 includes additional infrastructure as defined in the NPS-US, and
 - b. Including additional infrastructure in the definition of infrastructure is to ensure infrastructure provides fully integrated urban planning, and
 - c. Fully integrated urban planning is intended to provide well-functioning urban environments which is particularly relevant for densified urban environments.

Transport Network Infrastructure Issue

Evidence that Johnsonville is not alone in lacking a clear plan from the Council for upgrading its existing public transport network is provided in paragraphs 134 and 135 of the Section 42A Report where the Tawa Business Group have submitted similar comments. These comments simply reinforce the JCA's opening comments about the Council's problematic transport hierarchy for Johnsonville.

Coordinating Infrastructure with ... Development & Urban Growth Issue

There are three issues of concern to the JCA that need to be addressed to achieve well-functioning urban environments as Johnsonville is densified. These issues are:

- Infrastructure must include additional infrastructure (also known as social infrastructure) as defined in the NP-SUD), and
- All infrastructure shortfalls, including social infrastructure shortfalls, must be identified and publicly notified to affected communities as part of the development planning process for densifying a community, and
- All infrastructure shortfalls, including additional or social infrastructure shortfalls, must be fully rectified BEFORE residents are expected to live in densified buildings.

For example, the absence of adequate water pressure in tall buildings could compromise residents' amenity and safety as well as adversely affect fire-fighting capability and community resilience against fire outbreaks.

In paragraph 156 the Council officer has recommended that INF-P2 be amended as follows:

INF-P2: Coordinating infrastructure with land use, subdivision, development and urban growth

*Enable the efficient coordination, integration and alignment of infrastructure planning and delivery with land use, subdivision, development and urban growth so that **existing and future** land use and infrastructure is integrated, efficient and aligned.*

Whilst the above policy is good, the JCA notes that it does not address the above issues of concern to the JCA. The JCA considers the policy would be both clearer and strengthened if it included the above issues of concern.

Recommendations

13. The JCA requests the Commission support the JCA's recommendation to the WCC that INF-P2 includes the following additional policies:
 - a. Infrastructure includes additional infrastructure (also known as social infrastructure) as defined in the NP-SUD), and
 - b. All infrastructure shortfalls, including social infrastructure shortfalls, must be identified and publicly notified to affected communities as part of the development planning process for densifying a community, and
 - c. All infrastructure shortfalls, including additional or social infrastructure shortfalls, must be fully rectified BEFORE residents are expected to live in densified buildings.

Customer Connections Issue

The JCA supports the amendment proposed by the Council officer to INF-R2 to change the definition in the PDP which currently limits customer connections to telecommunications, electricity and gas networks. The Council officer's amendment is that the limit should be removed so that customer connections should apply to **all** infrastructure. The JCA notes that this amended definition would include customer connections to the Three Waters infrastructure.

Conclusion

The decisions about this PDP are the biggest change to the city of Wellington in at least the last 50 to 60 years if not longer than that. Decisions about the PDP will affect Johnsonville, in particular, as well as the wider city for the next 50 to 100 years. It is therefore fundamental that those decisions are sound and right. Prescient wisdom is the pre-eminent requirement to achieve this together with fully integrated planning to ensure that the end outcomes are well functioning urban environments.

Warren Taylor
on behalf of the Johnsonville Community Association