



ON SLOW RESIDENTS' COMMUNITY ASSOCIATION

Submission of the Onslow Residents' Community Association for the draft District Plan consultation 2021

The Onslow Residents Community Association represents the areas of Khandallah, Broadmeadows and Kaiwharawhara. Our purpose is to act as a conduit between the community and local authorities, represent the views and interests of our three communities, promote, develop and improve the public services and facilities for our community and foster a sense of community. We are a voice for our community.

Overview

The Onslow Residents Community Association is pleased to make a submission on the draft District Plan as part of Wellington City Council's 2021 consultation. This is based upon the views of two public meetings and a drop-in and comes from our Committee.

We support the need to urgently address the creation of affordable housing near the City that reduces carbon emissions and improves wellbeing, but key criteria used in the draft District Plan require tuning to achieve this.

The use of 6-10 storey densification in Khandallah will not produce affordable houses and reduced carbon emissions, as the Johnsonville Railway does not have the frequency and capacity of an RTS to take the transport burden, so development needs to be right-sized to what will.

The Council's choice to put SNAs on private land infringes property rights in a way that will actually lose biodiversity, while lack of investment in local reserves and infrastructure drives degradation of the natural environment.

Weak planning controls, including the city outcomes framework, the planning protections in the draft District Plan, together with the current practices of the Council consenting team, will lead to significant loss of amenity for both new and existing residents, which will degrade wellbeing in a potential intergenerational disaster lasting decades.

Large uncertainties in the forecasts on which the plan is based (including unassessed risks), the disruption caused by the Government's Medium Density Residential Standards (MDRS) (not unassessed), and the variability of plans for essential infrastructure (also misaligned with the draft District Plan), make the scale of the draft District Plan both unaffordable and unachievable.

We believe that if the Council focuses on meeting immediate needs by following people's choices, we can build what we need in the next ten years, using it as a platform to assess the next stage of development, which rather than being guessed, should be reserved for future plan amendments.

We also wish to make an oral submission.

We will now expand these points before making recommendations as to how the desired affordable housing and reduced carbon emissions can be achieved.

District Plan Criteria

We believe that several key criteria in the draft District Plan have been misjudged and should be amended.

Wrong Densification Type chosen along the Johnsonville Line corridor

Much of Khandallah, Ngaio and Crofton Downs has been designated for Type 4b, 6-10 storey residential densification *only* because the Johnsonville Railway Line has been *presumed* to be a Rapid Transit System with no assessment by any central or local government agency. This is driving zoning to use *unaffordable* construction methods with *higher carbon emissions*, yet it achieves *no more growth* than lower-height sustainable alternatives. Auckland has not made this mistake with the Onehunga Line. We urge the Council to use *sustainable construction with amenity* to promote *climate-friendly solutions with better wellbeing, which people will choose to live in*.

1. No assessment of the Johnsonville Railway Line against the NPS-UD definition and purposes for Rapid Transit has been undertaken in the One Network Framework, the Regional Land Transport Plan or the draft District Plan. There is no evidence supporting this designation. Furthermore the Onehunga Line in Auckland is not an RTS. In our assessment, neither is the Johnsonville Line, and it is a poor choice for 6-10 storey development:
 - a. *Is not fast*: The train from Johnsonville at 7:00am takes 23 minutes, but the bus takes 15 minutes, however unlike the train the bus leaves from closer to home and travels closer to work, so 80% more people take the bus (Timetable 13/12/21 and Commuter Waka 2018 data).
 - b. *Is not frequent*: The Johnsonville Line commuting frequency into Wellington is every 15 minutes, while the Kapiti and Hutt Valley Lines run at less than every 10 minutes, as does the No 1 bus from Johnsonville (Timetables 13/12/21).
 - c. *Does not have the capacity*: We calculate the peak hour train demand will *exceed train capacity* at least one day a week under the most conservative assumptions, and because of this *about 40% of new resident commuters will use cars, vans or trucks, driving up carbon emissions* (Corrected WCC Councillors' report).
2. *There is no plan to fix the timetable* or the train capacity, further this is *not feasible*. The positioning of its stops prevent a 10-minute operation (no timetable leeway). The track modifications to increase passing capability are not planned, nor assessed, and won't happen given the much larger growth opportunities along the already overloaded Kapiti and Hutt Valley Lines, and the funds required for mass transit south and east of the city.

This rather myopic focus on the railway designation loses focus on achieving the Council's goals:

3. The premium land value in Khandallah, the lack of effective transport options, and the additional space required to provide for cars, will continue to keep dwellings in our suburb among *the least affordable in the city*. Only 40% of people who choose our suburbs work in the inner city (Commuter Waka 2018) or walk, *others must choose other forms of transport*. Our roads are already too congested for large buses. Residential street parking is all but used up and has no power for EVs. Few new dwellings will sell without private transport parking, but those that do will *drive up carbon emissions* as *carbon-fuelled cars are needed longer*.
4. Talking with developers, the build cost over 3-4 storeys, and short of 12, makes dwellings *less affordable*, even more so in the terrain of our suburb. *Low carbon construction methods cannot be used*. Unsurprisingly, going to 6-10 storeys means *no more dwellings are forecast to be built* in Khandallah than at 3-4 stories. (The forecast number of Khandallah dwellings for 6-10 storeys in the proposed Spatial Plan is the same as the forecast for 3-4 storeys in the 2019 HBA at higher land and build values).
5. Finally, nobody will choose Khandallah for the vibrancy of towers and noise. These can be purchased nearer the city at similar prices. *As few people will choose such dwellings, few will be built*, and those will be *blots on the landscape* that benefit few and harm many.

Significant Natural Areas (SNAs) on private land reduce biodiversity

ORCA's suburbs have only a small amount of private bush compared to our *extensive natural reserves*. The Council's choice to designate this as SNAs is a poor one. A better choice would be to incentivise the choices already made by residents. The private areas have been preserved *voluntarily at the homeowners own initiative* and they will continue *with encouragement to do so*. They mostly consist of common native species, *none of which are at risk*.

Given that the MDRS will make it easy to assess how much residential value will be lost by the SNA protections, Council should be concerned that with more than 1,600 properties, *a class action lawsuit to recover the lost value would be highly likely (maybe up to \$0.5b)*.

As rate payers, *we do not want to see private land biodiversity terminated out of fear*, nor do we want *rates wasted on legal action* when they could be used to *improve biodiversity*.

The increased densification released by the draft District Plan will further exacerbate the *storm and waste water damage* to our local streams from *severe sewage pollution in high rain events*.

Poor Planning Controls reduce wellbeing

There are lavish claims for the health and well-being of the new design guides, but we don't see them delivering them as they do not apply to permitted builds. For example, "access to daylight and sunlight" *is a straight out untruth*, because there is no provision for sunlight at all in the draft District Plan, and *daylight is but one hour in the morning and one hour in the afternoon!* Nobody in our suburb currently has such poor quality access to such a vital amenity! We want design guide G2.5, *at least 4 hours of midwinter sun in at least one main living room*, to apply to permitted builds.

Rather, the framework is a *gateway to even more massive builds* as it allows 8-10 storey builds or more, something that was *never consulted upon in the Spatial Plan*. The outcome will be *destruction of character and amenity* and *overloaded services*, which amount to a large loss of quality of life and wellbeing.

Based on current experience, *we reject the City Outcomes Framework* as it is a license to empower individual Council officers to override resident's health and wellbeing with personal discretions of their on *without independent review*. (These and affordable housing should be provided for directly.) The framework is akin to giving the Police power to be arresting officer, judge and jury.

Large Uncertainties mean we need to right-size the plan

We take issue with the latest Council report from Sense Partners forecasting future population growth. They have chosen *double the net migration rate*, and therefore doubled the growth forecast by Statistics New Zealand without justification or evidence (it is well above the mean of the past period). The big issue in their report, however, is the "considerable uncertainty" (emphasis theirs) around their projections and that they have *not measured fundamental risks*, most of which fall in the highly probably category of reducing their inflated forecast.

The introduction of the MDRS during the consultation period of the draft District Plan *defeats the consultation process*. No assessment has been possible of its impact on the plan nor of how many dwellings it will enable to be built. Councillors are being asked to make decisions about plan criteria that may *no longer be required*, or may even be *invalid* under the new legislation. We suggest that *the sooner officials revise the draft District Plan to include the MDRS and reset public consultation the better*.

We submit that these two factors underline the considerable uncertainty that Wellington City faces in the future. The spread of possibilities means that simple planning tools such as a District Plan and the Ten Year Plan cannot cope. We must upgrade our planning tools with the flexibility to change and adapt as the Covid pandemic, the housing crisis, the climate crisis, and the economic and immigration responses to these unfold.

We strongly urge the Council to *pare back the District Plan growth strategy to focus on immediate needs* and the next ten years and to *build within its budget* to address these crises with more *directed action*. We do not have the infrastructure to build everywhere in Wellington and *none is planned for ORCA's suburbs*. ***Our schools are full, our roads are overflowing and we have no police and fire services locally. There is no support for inner city density here and no money to do it.***

Build a Brighter Future

We urge the Council to *stop fighting the people's choices* as it will destroy this city. Change your direction and *work with the people's choices*, then we will find space for everyone and improve wellbeing for everyone, *especially the disadvantaged*.

This has been ably demonstrated in the corridor up to Newtown, by the Newtown residents, in the Aro Valley, areas with high use of public and active transport, and Wellington City Mission community solutions that can be extended. Spend the \$billions on unlocking metropolitan centres such as Karori and Johnsonville who have been crying out for water, transport and local centre improvement for decades – *MDRS will require it*. Build along the well-used public transport corridors can that have *expandable capacity* and *integrate the transport modes* to Get Wellington Moving. *Don't defy the tides of 21st century technologies becoming the people's choices*.

Working with people's choice in ORCA's local suburbs means *densification that exploits the hills of ORCA's suburbs* to create *greater diversity of sustainable dwellings*, that releases dwellings to retired people so *more families with kids can build a future here*. We want the *precision of the surgeon's scalpel* (to quote the Chief Planning Officer) and when the draft District Plan contains wellbeing protections, then *they are adhered to*, not removed at the whim of a planning officer. *This is more in keeping with the approach of the MDRS than the 6-10 storey blanket developments of the Spatial Plan*.

Whether people rent or buy, it is vital we preserve the huge character and amenity value of our city to improve their quality of life and wellbeing. Nobody should impose their choices on others, we must work with theirs. We have to stop believing in silver bullets and face the cold hard realities of our uncertain future with wisdom and flexibility, embracing everyone, not least those who are trapped in the vast array of decaying properties the Council itself owns.

Conclusion

Given the draft District Plan's dependence on unknowable future uncertainty, we urge the Council to integrate the MDRS directives as fast as possible, and then right-size the densification proposals to fit Ten-Year Plan deliverable infrastructure, so we achieve immediate and short-term term needs.

We suggest the mass release of as much land as possible outside the inner city is not required nor will result in the affordable, low-carbon, sustainable city the Council seeks, particularly in the light of the demands of the new MDRS. Instead we ask that the Council works with the choices residents and businesses are making, not put up a plan that is defeated by them. This builds a platform for future plan amendments when the current instability subsides. It is vital for our wellbeing, our environment and to avoid an intergenerational disaster.

Finally, thank you for the opportunity to make a submission. We will also be sharing this submission in ORCA's communications with its members. Please feel free to contact our association at onslowcommunityassociation@gmail.com or by phone on 021 750 633 regarding this submission.

Yours sincerely

Lawrence Collingbourne, President on behalf of

Onslow Residents' Community Association