



# ON SLOW RESIDENTS' COMMUNITY ASSOCIATION

## Submission of the Onslow Residents' Community Association for the Proposed District Plan consultation under the RMA 2022

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 Proposed District Plan as part of Wellington City Council's 2022 consultation under the RMA. This is based upon the views of one public meeting, several previous public meetings on the draft District Plan and Spatial Plan, and comes from our Committee.

We would like to be heard in support of our submission in person.

If others make a similar submission, we will consider presenting a joint case with them at a hearing.

We could not gain an advantage in trade competition through this submission

***We support two specific plan components to reduce carbon emissions and improve wellbeing, but we oppose other key components of the Proposed District Plan that degrade these outcomes.***

- 1. We support using NPS-UD Policy 3(d) along the Johnsonville railway line***
- 2. We support no Significant Natural Areas (SNAs) on private residential land***
- 3. We oppose the designation of Khandallah as a Local Centre with 22m and 14m development***
- 4. We oppose mixed-use 22m, single shop front development in the Khandallah centre***
- 5. We want 3-waters infrastructure designated as a qualifying matter***
- 6. We want the Medium Density Residential Zone (MRZ) front and side setbacks reinstated.***

### Proposed District Plan components that must remain

We want to keep two key components on the Proposed District Plan to reduce carbon emissions and safeguard wellbeing, while providing capacity for demand.

[We support using NPS-UD Policy 3 \(d\) along the Johnsonville Railway Line](#)

We oppose any attempt to reinstate NPS-UD Policy 3 (c) (i) along the Johnsonville Line.

In previous planning documents, including the Wellington City Spatial Plan and draft District Plan, the Council attempted to assert the Johnsonville Railway Line as a Rapid Transit System (RTS) for development purposes as defined in the National Policy Statement for Urban Development (NPS-

UD). This was done without defining explicit criteria and relied on definitions used for other purposes that exclude the required characteristics of the NPS-UD.

At the Council meeting accepting the Proposed District Plan, Council explicitly rejected the RTS designation for the Johnsonville Line and required the plan to meet NPS-UD Policy 3 (d). We support this amendment being retained the published plan.

We submit two evidences for keeping this component of the Proposed District Plan:

1. The paper submitted to Council on the draft District Plan, "*Review of the designation of the Johnsonville Railway Line as a Rapid Transit System*", by Lawrence Collingbourne, Tony Randle and Julie Ward, which shows that the Johnsonville Line is not Rapid Transit and if relied upon for being so, would fail to provide sufficient capacity, cause a significant increase in carbon emissions and congestion, and degrade wellbeing along its catchment.
2. The Greater Wellington Regional Council, "WELLINGTON RAIL PROGRAMME BUSINESS CASE", July 2022, which defines rail Growth Corridors at ten trains per hour, with the Key Improvements required to build these. This entirely excludes the Johnsonville Line, and defines criteria for RTS in the Wellington Region that the Johnsonville Line cannot meet.

### We support no Significant Natural Areas (SNAs) on private land

We oppose reinstating SNAs on private residential land. Previous planning documents, including the Wellington City Spatial Plan and draft District Plan, identified the need to protect Significant Natural Areas on private residential property. Rather than protect them, the threat of these provisions caused much destruction as land owners sought to remove the restrictions of these provisions from their property.

At the Council meeting accepting the Proposed District Plan, Council explicitly deferred Significant Natural Areas on residential property and they are not in the Proposed District Plan. This requirement only protects a very small amount of the SNAs in our district, while causing significant loss in property value to the well-intended people who have encouraged natural flora to thrive on their property. To do otherwise will cause even more of this biodiversity to be lost as land owners remove it while it is still legal to do so.

### Proposed District Plan components that we oppose

We oppose several components of the Proposed District Plan and propose amendments in these areas under four headings. We want to safeguard our local amenity and character, while enabling greater densification sufficient to meet future growth and also minimising carbon emissions.

#### We oppose the designation of Khandallah as a Local Centre

We oppose the level of medium density 14m development proposed for Khandallah and the 22m zoning for the centre itself as neither are "commensurate with the level of commercial activity and community services" required by NPS-US Policy 3 (d).

Khandallah is a small neighbourhood village that only supports its local community. The adjacent centres of Ngaio-Crofton Downs and Johnsonville have all the services Khandallah has, and also contain larger facilities, so do not require such support. The current supermarket and retail shops, plus services including medical, education, recreation, etc. are all small and are at capacity right now. The road the retail centre is on is a constrained one-lane road. They therefore will not support the increased demand coming from the significant medium density development proposed by 14m zones.

Further, we want an error in the District Plan corrected that designates one café, one garage and one restaurant at Station Road as a Local Centre. This appears to extend the MRZ beyond reasonable limits. Also, there is no footpath that makes the southern end of Simla Crescent accessible in its entirety within a reasonable walking catchment of the Khandallah centre.

We oppose the level of medium density 14m development proposed for Khandallah as it exceeds “the relative demand for housing and business use in that location”.

We want Khandallah designated as a Neighbourhood Centre and the 22m and 14m height zones removed and replaced with 12m and 11m respectively.

Please also see the next two sections on 3-waters readiness and loss of commercial services with respect to development capacity.

### [Change 3-waters to be a qualifying matter](#)

We submit that 3-waters infrastructure in Khandallah is a qualifying matter that makes the proposed development unsustainable.

The report on the readiness of the 3-waters infrastructure in our district for development (“Three Waters Assessment – Growth Catchments Mahi Table and Cost Estimates”, Wellington Water, March 2021) shows that it is either already low-pressure (water supply), under-capacity (waste water), or unknown (storm water), so does not support the development enabled by the Proposed District Plan.

We oppose the level of 14m development in Khandallah contained in the Proposed District Plan as being inappropriate to the water infrastructure capacity, while using MDRS provides “sufficient development capacity” as required by NPS-UD Policy 2 (the realisable capacity of dwellings in the Proposed District Plan significantly exceeds the expected population growth for the City).

This report and our experience identifies the following issues:

1. low drinking water pressure,
2. lack of earthquake resilience,
3. insufficient storm water capacity causing flooding, and
4. significant waste water pollution events contaminating properties and storm water.

The Long Term Plan shows that Wellington City has a substantial shortfall in approved funding to remedy these problems and build additional capacity to meet growth demand.

### [We oppose mixed use 22m, single shop front development in our local centre](#)

We oppose using 22m Local Zone rules for the Khandallah centre, for the following reasons:

1. Khandallah as a very small centre built around the single-lane Ganges Road, which is a NW-SE wind corridor. 22m development will create an unacceptable wind tunnel effect in this centre, and deprive businesses and residents of sunlight.
2. The scale of residential proposed on top of ground floor retail in Local Centres is an unproven strategy in the suburbs of Wellington that may result in the loss of commercial facilities. This is exacerbated by only requiring a nominal shop window, which can be left unlet without impacting the commercial viability of the development.
3. This is further compounded by the lack of delivery access or any open space around our small centre, which will create congestion and noise for the residents in the 22m development.
4. The resulting loss of the commercial centre facilities then becomes a Catch-22, as only a smaller population can be supported, which confirms that Khandallah must be a Neighbourhood Centre.

We want the Neighbourhood Zone height limits set at 12m for the Khandallah Centre.

### [Reinstate MDRS setbacks across all medium density development](#)

We oppose the removal of MRZ front and side yard setbacks at the Council meeting accepting the Proposed District Plan. Given the work that went into the new MDRS legislation, we oppose this as being interference in a reasonable standard that protects local amenity, without just cause,

especially as we have already pointed out that there is more than enough development capacity without this interference.

It is important to use that the District Plan distinguishes the outer suburbs amenity from the inner city and metropolitan areas in order to retain choices for the city residents, to do otherwise destroys existing character for no reasonable gain in development capacity.

We want the Proposed District Plan amended to ensure that the MRZ front and side yard setbacks are restored to all Medium Density Zones.

## Conclusion

We believe that the Council has mis-represented the needs and capacity of Khandallah to support Local Centre status, just as it wrongly assessed the capacity of the Johnsonville Line to be a Rapid Transit System. The consequences of these misjudgement defeat the purpose of the plan. The loss of commercial amenity and loss of character will be devastating to Khandallah. It will drive up carbon emissions and reduce wellbeing.

Keeping Khandallah as the Neighbourhood Centre it really is, both physically and in the services it provides, does two things. It balances population and amenity and it helps achieve NPS-UD Policy 2. It ensures that capacity is sized for the demand for housing and business land and keeps development commensurate with the level of commercial activity and community services.

The Medium Density Zone front and side yard setbacks must be reinstated in full and development heights kept to 11m throughout Khandallah to minimise damage to the significant existing character and amenity of Khandallah. The Khandallah Centre height should be constrained to 12m.

We note the already massive over-provision of development capacity in the Proposed District Plan even before the additional capacity enabled by Let's get Wellington Moving (LGWM) over the next 30 years is taken into consideration. We ask that the plan differentiates between the Outer Suburbs and the Inner City and Metropolitan Centres in Wellington to preserve amenity and character choices for its residents.

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 54 Waru Street, Khandallah, Wellington, by email at [onslowcommunityassn@gmail.com](mailto:onslowcommunityassn@gmail.com) or by phone on 021 750 633 regarding this submission.

Yours sincerely,

Lawrence Collingbourne, President on behalf of

Onslow Residents' Community Association