

1. EXECUTIVE SUMMARY

- 1.1 My full name is Matthew Cecil Heale. I am a Principal Planner and Nelson Planning Team Lead at The Property Group, based in Nelson. I have been engaged by Kāinga Ora – Homes and Communities (**Kāinga Ora**) to provide evidence in support of its primary and further submissions to Greater Wellington Regional Council's (**GWRC**) Proposed Plan Change 1 to the Regional Policy Statement (**PC1**).
- 1.2 My evidence will address the following matters:
- (a) **Regional Centres Hierarchy** – I recommend changes to improve national and regional consistency by incorporating and classifying appropriate centres in the proposed regional centres hierarchy; and
 - (b) **Intensification levels and Locations** – I recommend applying *high density development* to Town Centre Zones in larger *urban areas*, providing for intensification along the Johnsonville rail line to better integrate land use and transport planning, and improving the *walkable catchment* definition and consequential policy changes;
- 1.3 I have recommended changes to relevant policies and definitions as set out in **Appendix 1** and where appropriate I have prepared a Section 32AA assessment in **Appendix 2** of my evidence.
- 1.4 In my opinion, the underlying principles that have informed the proposed changes set out in the Kāinga Ora submissions and discussed in my evidence will better align the Regional Policy Statement (**RPS**) with the National Policy Statement Urban Development (**NPS-UD**), the National Planning Standards (**Standards**) and Resource Management Act 1991 (**RMA**) regional functions and RPS requirements. These changes will also improve regional integration and consistency.

2. INTRODUCTION

- 2.1 My full name is Matthew Cecil Heale. I am Principal Planner and Nelson Planning Team Lead at the Property Group Limited, based in Nelson.
- 2.2 I have a Bachelor of Planning from the University of Auckland and have 30 years' experience in working with resource management and planning matters under the RMA. I am a chair accredited commissioner and a Freshwater Commissioner.
- 2.3 I have worked for local government (Waitakere City Council, Auckland Regional Council, and Nelson City Council) and in private consultancy. My experience includes the preparation and processing of applications for resource consent and the preparation of, and submissions to, District, Regional and Unitary Plans across Aotearoa. I have led the review of the Waitakere District Plan, the Nelson Resource Management Plan, and the Gore District Plan.
- 2.4 I have been involved in the development of regional and district growth management strategies and spatial plans in Auckland and Nelson/Tasman, and associated development of centres hierarchies. I helped develop the first centres hierarchy for the Auckland region, across seven Council jurisdictions, as part of the Local Government (Auckland) Amendment Act 2004 (**LG(A)AA**) process. Since then, I have assisted with developing centres hierarchies for Nelson/Tasman and Gore District to implement the National Planning Standards. I have also prepared evidence for, and appeared in, numerous resource management plan hearings, Environment Court mediations, and Environment Court hearings.
- 2.5 I am familiar with the Wellington region through my work preparing early drafts of the centres chapters (Metropolitan, Town, Local, and Neighbourhood) for Wellington City Council (mid 2020 to early 2021) and through my work for Kāinga Ora preparing submissions and further submissions on the Wellington City Proposed District Plan (**PDP**) and other plans in the Wellington region.

- 2.6 I am providing planning evidence on behalf of Kāinga Ora on PC1. I was not involved in the preparation of primary and further submissions by Kāinga Ora in relation to PC1 but have been involved in providing evidence for Kāinga Ora on the Wellington City Council PDP.
- 2.7 I am familiar with the corporate intent of Kāinga Ora in respect of the provision of housing and urban development within the Wellington region. I am also familiar with the national, regional and district planning documents relevant to PC1.

3. CODE OF CONDUCT

- 3.1 Although this is a Council hearing, I have read the Environment Court's Code of Conduct for Expert Witnesses and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

4. SCOPE OF EVIDENCE

- 4.1 Hearing Stream 4 addresses submission points relating to urban development.
- 4.2 In preparing this evidence I have read the following documents:
- a) The RPS and PC1 provisions;
 - b) The Kāinga Ora submissions in relation to PC1;
 - c) The Section 32 Evaluation report for PC1; and
 - d) Urban Development Section 42A report.
- 4.3 My evidence should be read together with the statement of evidence from Tim Heath (Economics) and the statement of evidence of Brendon Liggett on behalf of Kāinga Ora.

5. AREAS OF AGREEMENT WITH SECTION 42A REPORT

5.1 Having reviewed the section 42A report, I generally support the following recommendations by the reporting officer on various key submissions and further submissions by Kāinga Ora. Kāinga Ora sought:

- a) Changes¹ to Policy UD.3 for structural improvements, to achieve closer alignment with Council's strategic outcomes and the need to address development capacity issues. Changes recommended by the reporting officer address these issues;
- b) Changes² to Chapter 3.9: regional form, design and function introductory text to improve alignment with the NPS-UD including the deletion of Figure 3 of the Wellington Regional Growth Framework (**WRGF**). Changes recommended by the reporting officer improve alignment with the NPS-UD and provide additional context around the WRGF, that notably includes the Johnsonville Rail Line;
- c) Amendments to Objective 22³ to clarify the expectations in relation to natural and built environment outcomes. The reporting officer recommended changes achieve this additional clarity, particularly when supported by amendments to Policy 30 and 31 sought by Kāinga Ora;
- d) Retention of Policy 67⁴ and method UD.1 on the basis that design guidance was recognised as a non-regulatory tool. The recommended changes by the reporting officer retain this focus; and
- e) Changes to definitions including *City Centre Zone*, *Urban Areas*, *Medium Density Development* and *High Density*

¹ Submission points 158.001, 158.002, 158.044, and 158.029

² Submission point 158.012 and FS12.009

³ Submission point 158.037, FS12.017 and FS12.012

⁴ Submission point 158.031

*Development*⁵. The officer recommendations in relation to these definitions are supported on the basis that amendments sought by Kāinga Ora are made to Policy 30 and 31 to improve regional integration.

- f) Changes to Policy 32, Policy 55, Policy 58, and Policy UD.4 and UD.5⁶ to the extent that they support the key areas of improvement outlined below. The officer recommendations support these key areas of improvement and improve regional integration.

5.2 The remainder of my evidence addresses key matters of particular interest to Kāinga Ora that remain of concern.

6. AREAS FOR IMPROVEMENT SOUGHT:

6.1 Kāinga Ora remains of the view that amendments are necessary to PC1, in the following provisions:

- a) Policy 30;
- b) Policy 31;
- c) Policy 57; and
- d) Definition of walkable catchment and consequential changes to Policy CC.2A

6.2 The remainder of my evidence addresses these key matters of particular interest to Kāinga Ora that remain of concern.

Regional Centres Hierarchy – Policy 30

6.3 The Kāinga Ora submission⁷ sought amendments to Policy 30 to achieve a regionally consistent approach in the hierarchy of centres and better alignment with National Planning Standards. This principally included noting that high density residential living was a key

⁵ Submission Points 158.040, 158.042, FS12.015 and FS12.016.

⁶ Submission Points 158.47, 158.028, and 158.029.

⁷ Submission point 158.026

outcome and a comprehensive list of Metropolitan and Town centres should be included in Policy 30 to better align with Policy 31. The additions to the list of centres includes:

Regionally Significant Centres/Metropolitan Centres

- (a) Kilbirnie
- (b) Johnsonville
- (c) Petone

Locally Significant Centres/Town Centres

- (d) Miramar
- (e) Newtown
- (f) Tawa
- (g) Naenae
- (h) Waterloo
- (i) Mana
- (j) Otaki (Township)
- (k) Otaki (Main Road)
- (l) Paraparaumu Beach
- (m) Raumati Town

- 6.4 While the inclusion of Johnsonville and Kilbirnie are recommended to be added to the regionally significant centres by the reporting officer, Raumati Town has been added to locally significant centres and it has been clarified that Otaki Main Road and Otaki Township are both locally significant centres, other changes have not been recommended for the following reasons⁸:

⁸ S42A Report - Urban Development - Paragraphs 740-756

- (a) The National Planning Standards (**Standards**) for the RPS do not require centre typologies and using standards wording would essentially be zoning;
- (b) While Draft PC1 included more detailed centre types this was not supported by Territorial Authorities and would be overly directive. Instead, the approach was to align with centres zoning in the city and district plans;
- (c) While most Councils have given effect to the Standards (except Hutt City Council and Wairarapa), using centre zoning terminology would lead to misalignment with district plans in the future;
- (d) 'Regionally significant centres' incorporate City Centre and Metropolitan Centre Zones while 'locally significant centres' include Town Centre Zones given their sub-regional focus and/or scale of activity;
- (e) It is appropriate to include a list of locally significant centres in accordance with RMA section 30 functions as this is not a significant change from the operative RPS and RMA section 30(ba) requires sufficient development capacity which these will help fulfil.

6.5 It was also noted that wording seeking reference to high density living and well-functioning urban environments was more appropriately addressed in Policy 31 which is where density outcomes are detailed⁹

6.6 I also note that the PC1 Section 32¹⁰ Evaluation considered three broad options relating to Urban Development and favoured option 1 as outlined below:

- (i) Option 1 - PC1 including Policy 30 and 31,
- (ii) Option 2 - A minimal approach focussed on Policy 31, and

⁹ Ibid – paragraphs 759 to 765

¹⁰ SECTION 32 GREATER WELLINGTON PROPOSED RPS CHANGE 1 2022 – Page 200

- (iii) Option 3 - A spatial approach mapping centres to align with the WRGF.

6.7 The overall evaluation concluded:

“Overall, Option 1 is the most effective and efficient approach to achieve the objectives. The option balances enabling urban development to provide for sufficient development capacity, create opportunities for high quality living environments that are well connected with efficient end use of energy, and maintaining the quality of the natural environment in line with other RPS direction. This is achieved through a regulatory approach that provides clear direction to territorial authorities, decision makers and the community for how urban development is undertaken to provide for the characteristics and qualities of well-functioning urban environments. While the approach goes further than the “minimum approach” (Option 2) in relation to changes to give effect to the NPS-UD, the benefits of this additional direction outweigh the lower overall costs. Conversely, the approach acknowledges the timing of this RPS change within the likely timing of the FDS that will provide future regional direction for achieving the qualities and characteristics of well-functioning urban environments once it has been developed. It therefore does not seek to conflict with it and does not adopt any spatial elements of the WRGF.”¹¹

6.8 The reporting officers Section 32AA Evaluation¹² supports the recommended amendments to Policy 30 including for the following reasons:

- (a) The list of regional and local centres are retained to direct lower order documents but the amendments apply a consistent approach to identifying centres which improves clarity;
- (b) The centres identified are subject to intensification and the amendments do not change this outcome; and

¹¹ SECTION 32 GREATER WELLINGTON PROPOSED RPS CHANGE 1 2022 – Page 213

¹² S42A Report - Urban Development - Paragraphs 768

- (c) The amendments do not result in increased costs but there will be benefits to ensuring these centres are included.

6.9 The reporting officers Section 32AA Evaluation¹³ supports the recommended amendments to Policy 30 including for the following reasons:

- (a) The list of regional and local centres are retained to direct lower order documents but the amendments apply a consistent approach to identifying centres which improves clarity;
- (b) The centres identified are subject to intensification and the amendments do not change this outcome; and
- (c) The amendments do not result in increased costs but there will be benefits to ensuring these centres are included.

6.10 I disagree with the Section 42A, Section 32, and Section 32 AA recommendations outlined above for the following reasons:

- (a) While the Standards do not require the use of centres typology in the RPS, Standards centres terminology has been utilised in Policy 31 and Standards definitions have been included in the RPS. This has already been undertaken by GWRC in PC1. The purpose of Policy 30 and 31 is to guide district plan development in a regionally consistent way (which is the key purpose of a RPS) so a consistent centres typology should be adopted in the RPS.
- (b) As noted in Kāinga Ora submissions, the Wellington Region Intensification Planning Instrument (IPI) process has been run backwards as Independent Hearings Panel (IHP) recommendations have already been released in some territorial authorities and IPI hearings have largely been completed for district plans ahead of the RPS which makes it difficult for district plans to give effect or have regard to the RPS in accordance with RMA requirements. This has resulted

¹³ S42A Report - Urban Development - Paragraphs 768

in missed opportunities to achieve regional integration and associated cost savings¹⁴.

- (c) The purpose of an RPS is to “achieve integrated management of natural and physical resources across the region”¹⁵ and district plans shall have regard to the proposed RPS¹⁶. The process described by the reporting officer and used to inform Policy 30 suggests that the RPS has had regard to notified district plans, which have now changed via recommendations and decisions to no longer reflect Policy 30. The RPS should be leading and directing district plans on how to give effect to the NPS-UD in a regionally consistent way rather than the other way around.
- (d) RMA Regional Council functions direct the Council to include provisions in plans that achieve integrated management and ensure there is sufficient housing and business development capacity to meet the expected demands of the region¹⁷. This suggests that the Regional Council should lead this process however the reporting officer suggests the Regional Council has largely followed the city/district Councils. Fortunately, the submissions across the city/district plans and the RPS by Kāinga Ora and others allow scope for the Regional Council to rectify this by providing clear direction via Policy 30 (and Policies 31 and 57). The GWRC should be proactive in setting the directives of Policy 30, the centres hierarchy, for the region, rather than be ‘reactive’ and leaving the hierarchy to City/District Council and their plan change processes, which is what we are seeing now.
- (e) There are significant benefits in the RPS providing strong direction on Centres and Urban Intensification. Regardless of

¹⁴ For example, developing a regionally consistent centres typology early on would have allowed local Councils to use the same technical work through the hearing process and limit debate between Councils in the hearing process which was the case in LG(A)AA hearings in Auckland

¹⁵ RMA section 59

¹⁶ RMA s74(2)(a)

¹⁷ RMA s30(1)(a) and (ba)

the current plan changes and plan reviews in play, GWRC should be taking a lead role, as the Regional Council, to identify the centres hierarchy for the region. In particular, there are limited appeal rights to IPI plan changes and the regional centres hierarchy can be determined once, so that future plan changes will have to give effect to the Centres hierarchy rather than relitigate it. This will be of particular relevance to Councils such as Hutt City and Wairarapa who are due to implement the Standards by November 2024¹⁸ along with future district plan changes or decisions yet to be released to improve regional consistency. Amendments sought from Kāinga Ora to Policy 30 will help these councils to get regional consistency and alignment with the RPS.

- (f) It is worth noting that the Wellington Territorial Authorities' positions have changed as a result of the evidence presented at district plan hearings, decisions and section 42A recommendations. This work should inform and be informed by RPS decisions. Mr Heath's evidence includes Table 1 showing the recommended Centres hierarchy sought from Kāinga Ora along with the height and catchments now proposed by the local Councils via section 42A recommendations and decisions in current IPI plan changes and plan reviews underway.
- (g) There is currently a disconnect between Policy 30 and 31 given the different terminology used. RPS language of "regionally significant" and "locally significant" versus Standards terminology of Metropolitan and Town Centre or their equivalent. This should be addressed as part of PC1 so that these policies work as an integrated package, are consistent and easier to understand and implement.
- (h) Higher order Centres (City, Metropolitan, and Town) ensure the success of the regional economic unit and should therefore

¹⁸ National Planning Standards 2019 – Implementation Standard 4(a)

be managed at a regional level, particularly to address any cross boundary effects and achieve an appropriate regional spatial allocation of centre types.

- (i) Policy 30 covers all centre types but the chapeau only references regionally and locally significant centres.
- (j) Technical work provided in City and District Council hearings and evidence provided by Mr Heath clearly indicates that there are a broader range of centres that should be included in Policy 30. Previous evidence is summarised in **Appendix 3**. In particular, additional Town Centres (or their equivalent) should be added and Petone should be a Metropolitan Centre because they more closely align with those Centre Standards descriptions given their Journey to Work catchments, and their economic and regional spatial function warrants change.

6.11 For the reasons outlined above, changes should be made to Policy 30 as follows:

Policy 30: Maintaining and enhancing the viability and vibrancy of ~~regionally and locally significant~~ centres – district plans

District plans shall include policies, rules and/or methods that enable and manage a range of land use activities that maintain and enhance the viability and vibrancy of:

1. ~~the regionally significant central business district of~~ Wellington City Centre;
2. ~~other regionally significant~~ the metropolitan centres across the Wellington region:
 - i. Upper Hutt;
 - ii. Lower Hutt;
 - iii. Porirua;

iv. Paraparaumu;

v. Masterton;

vi. Johnsonville; ~~and~~

vii. Kilbirnie; and

viii. Petone

3. the ~~locally significant~~ Town centres across the Wellington region of Suburban centres in:

Larger Urban Area

i. Petone;

i. Miramar;

ii. Tawa;

iii. Newtown;

iv. Naenae;

v. Waterloo;

vi. Mana;

vii. Paraparaumu Beach;

viii. Waikanae;

ix. Raumati Town;

Smaller Urban Area

x. Ōtaki Main Road;

xi. Ōtaki Township;

xii. Featherston;

xiii. Greytown

xiv. Carterton; and

xv. Martinborough.

4. ~~Other~~ local and neighbourhood centres that provide for the ~~daily and weekly~~ needs of their residential catchments.

Explanation

Policy 30 identifies the hierarchy of regionally and locally significant centres within the Wellington Region. The centres identified are of significance to the region's form for economic development, transport movement, civic or community investment. These centres are identified as City Centre, Metropolitan Centre, Town Centre, and Local and Neighbourhood centres.

By identifying these centres and in enabling their planned purpose and role in the urban environment and wider region, Policy 30 is intended to help achieve a regional form that deliver other outcomes identified in the RPS. This includes, reducing greenhouse gas emissions, ensuring an equitable access to commercial and community services, economic development, and land use-transport integration.

District plans are required to identify these centres and include provisions that enable them to achieve their planned purpose and role. Maintaining and enhancing the viability and vibrancy of these centres is important in order to encourage investment and development that supports an increased range and diversity of activities. It is also important for their prosperity and resilience in the face of social and economic change.

The Wellington City Centre is identified as the regional main central business district ~~is the major and only city~~ centre in the Wellington region; the other key centres across the region are also regionally significant and provide significant for business, retailing and community

services. This policy does not limit territorial authorities from identifying additional centres of local significance within the district plan.

- 6.12 These changes are supported by a section 32AA evaluation of Policy 30 and Policy 31 attached at **Appendix 2**.

Intensification Levels and Locations

- 6.13 The Kāinga Ora submission¹⁹ sought a regionally consistent approach in the hierarchy of centres, alignment with the Standards, and better direction of where *high density development* could occur. This approach would add value to what is in the NPS-UD rather than duplicate it. Via changes introduced in Hearing Stream 3, changes to the new definition of *walkable catchment* are also sought.²⁰ Changes to chapter 3.9 Regional form, design and function introductory text were also sought in the submission of Kainga Ora²¹ to delete reference to Figure 3 (that references the Wellington Regional Growth Framework map) and alternative consequential relief to achieve this.

Policy 31

- 6.14 The reporting officer has recommended some changes to Policy 31 to reflect all centres and differentiate between City Centre and Metropolitan Centre outcomes to better reflect NPS-UD policies 3 and 5 and that a reference to other centre types is appropriate to reflect NPS-UD Policy 3²². The reporting officer also rejects including building heights of at least six storeys (*High Density Development*) within and adjacent to Town Centre Zones, particularly as this would have implications for smaller Town Centres such as Featherston where this level of intensification is not anticipated²³. Furthermore, the Kāinga Ora submission point seeking clarity on levels of intensification is also rejected given the potential conflict with local Council plan changes.

¹⁹ Submission point 158.027

²⁰ Submission Point 158.013

²¹ Submission Point 158.012

²² S42A Report – Hearing Stream 4 – Paragraph 399

²³ Ibid – Paragraph 400

- 6.15 I have recommended changes to Policy 31 that improve the integration with Policy 30 as follows:

Policy 31: Enabling intensification to contribute to well-functioning urban areas – district plans

District plans shall include policies, rules and/or methods that enable intensification within urban areas where it contributes to a compact, well-designed, climate-resilient, accessible and environmentally responsive regional form with well-functioning urban areas (as articulated in Policy UD.5) by:

(a) For any tier 1 territorial authority, identifying a range of building heights and urban form densities to:

(i) realise as much development capacity as possible in the city centre zones; and

(ii) enable *high density development* within: Metropolitan Centre zones and Town Centre Zones in Larger urban areas; and ~~any other locations~~, within a walkable catchment of:

1. existing and planned rapid transit; or

2. edge of city centre zones, ~~and~~ metropolitan centre zones and Town Centres in Larger urban areas; or

3. areas with a range of commercial activities and community services; and

(iii) enable medium density development; and

(iv) otherwise reflect the purpose of, and level of commercial activities and community services within, town, local and neighbourhood centres; and

For any other territorial authority not identified as a tier 1 territorial authority, identifying areas for greater building height and urban form densities:

- (i) within, and adjacent to Town Centre zones where appropriate; and
- (ii) where there is good access to existing or planned active and public transport and a range of commercial activities and community services; and/or
- (iii) to meet relative demand for housing and business use in that location.

6.16 This approach includes distinguishing between Town Centre Zones in “larger” *urban areas* and “smaller” *urban areas* to more closely align with the National Planning Standards description below:

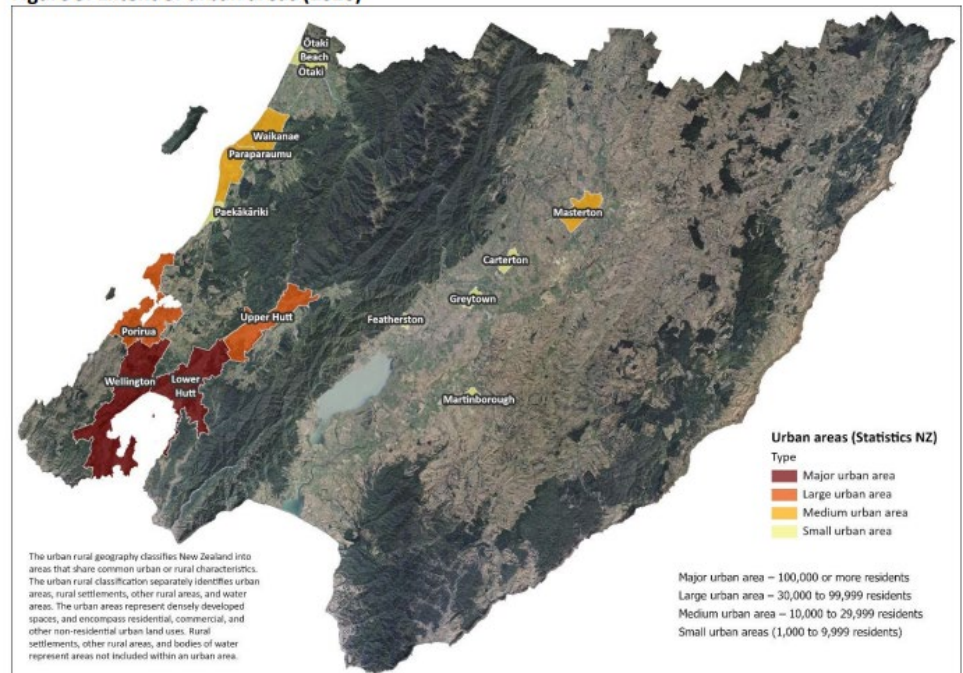
“Town Centre Zone - Areas used predominantly for:

- in smaller urban areas, a range of commercial, community, recreational and residential activities.*
- in larger urban areas, a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs.”*

6.17 The differentiation between “larger” and “smaller” Town Centres has relied on the PC1 section 32 evaluation report map²⁴ depicting small and other *urban areas* shown below:

²⁴ RPS PC1 S32 Assessment Page 46

Figure 5: Extent of urban areas (2020)



- 6.18 This then allows a distinction between “larger” urban Town Centres (or their equivalent) where Councils are seeking six storey development and “smaller” urban Town Centres where this is not the case²⁵. This nuanced approach also more clearly articulates which regional outcomes are sought across the regional centres hierarchy rather than largely duplicating what is captured in the NPS-UD. This is considered more efficient and effective than relying on each district plan to implement the NPS-UD directly as outlined in the attached section 32AA assessment (**Appendix 2**).
- 6.19 City and District Councils have already outlined in their IPI plan changes that height limits of six storeys or above within (and within a walkable catchment of between five and ten minutes) Town Centres (or their equivalent) is critical to achieving NPS-UD objectives and policies. This approach would not only achieve NPS-UD policies relating to height and density requirements (Policy 3 and 5) but also achieving development capacity (Policy 2) and housing bottom line (Policy 7) requirements. Achieving well-functioning urban environments by providing a variety of homes and businesses in the right locations to

²⁵ see proposed changes to Policy 30 for a list of small and larger *urban area* Town Centres

achieve reductions in greenhouse gas emissions and become more resilient to the future effects of climate change (Policy 1) is also an outcome of providing six storey development within and adjacent to Town Centres.

Policy 57

- 6.20 Given the absence of a region wide Future Development Strategy it is appropriate to include reference to the WRGF throughout the RPS. However, this has been inconsistently referenced across the RPS and should include reference to the west-east corridors as outlined in Chapter 3.9 Regional form, design and function Introductory comments as follows:

“Supporting the role of regional spatial planning

....The Wellington Regional Growth Framework identifies the three key growth corridors within the Wellington Region being the western, eastern and Let’s Get Wellington Moving growth corridors. **Two additional potential west-east corridors are identified.** The corridors are shown in Figure 3 below.” (See **Appendix 4** attached for Figure 3).

- 6.21 At the very least, relevant policies should include reference to the Rapid Transit Network which includes the Johnsonville Rail Line. This will more closely align with achieving NPS-UD Policy 3 (c) that requires building heights of at least six storeys within at least a walkable catchment of existing and planned rapid transit stops. Detailed evidence was provided on this point in WCC PDP hearings²⁶ confirming that the Johnsonville Rail line is part of the Rapid Transit Network. This was supported by the WCC Section 42A report and by experts from the Regional Council.

- 6.22 Consequently, Policy 57 should be amended as follows:

Policy 57 – Integrating land use and transportation – consideration

²⁶ Matt Heale Statement of Planning Evidence to Wellington PDP 7 February 2023 Paragraph 4.8 to 4.13 <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/01/submitter-evidence/submitter-evidence--matt-heale-for-kainga-ora--submitter-id-391--fs89.pdf> 8

When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for subdivision, use or development, seek to achieve integration between land use and transport planning within the Wellington Region in a way which:

(a) supports a safe, reliable, equitable, inclusive and efficient transport network; and

(b) supports connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity; and

(c) minimises private vehicle travel and trip length while supporting mode shift to public transport or active modes and support the move towards low and zero-carbon modes; and

(d) provides for well-connected, safe and accessible multi modal transport networks while recognising that the timing and sequencing of land use and public transport may result in a period where the provision of public transport may not be efficient or practical; and

(e) supports and enables the growth corridors [and the Rapid Transit Network](#) in the Wellington Region [as illustrated in Figure 3](#), including:

i. Western Growth Corridor – Tawa to Levin;

ii. Eastern Growth Corridor – Hutt to Masterton;

iii. Let's Get Wellington Moving Growth Corridor;

[iv. The Johnsonville Rail Line](#); and

(f) minimises the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors.

Explanation

Progress towards the Wellington Regional Land Transport Plan key outcomes cannot be achieved by that Strategy alone. Subdivision, use and development decisions also need to consider impacts on the

Strategy's outcomes. Policy 57 lists matters that need to be considered for all proposals that affect land transport outcomes. It seeks to align with the Wellington Regional Land Transport Plan and support decarbonising the transport system in the Wellington Region.

Walkable Catchments Definition and Consequential Policy Changes

6.23 Planning evidence presented by Victoria Woodbridge on behalf of Kāinga Ora in Hearing Stream 3²⁷ supported the inclusion of the definition of *walkable catchment* but considered the definition could be refined to include clearer direction. The evidence noted that the reference to walking from a specific point to get to multiple destinations is vague and does not provide appropriate direction given the intent of NPS-UD Policy 3(c) which seeks to provide a spatial extent for intensification around existing and planned rapid transit stops and centre zones.

6.24 I concur with Ms Woodbridge's evidence and have recommended changes to the definition to improve clarity and align with, but not duplicate, spatial extents and definitions used across the Wellington region²⁸ and associated evidence²⁹. The proposed definition is as follows:

A walkable catchment is an area ~~generally that an average person could walk from a specific point to get to multiple destinations. A walkable catchment~~ consisting of a minimum of five minute and a maximum 20-minute average walk, ~~or as otherwise identified by territorial authorities in district plans.~~

6.25 While the definition does not indicate where the walkable catchment is measured from or to, I believe this is already addressed in Policy 31 which stipulates that the walkable catchment is around:

²⁷ Statement of Evidence of Victoria Woodbridge – Hearing Stream 3 – Climate Change (planning) 14 August 2023 - Paragraphs 6.2 to 6.7

²⁸ See for example WCC HS1 s42A Report where walkable catchments range from 5 to 15 minutes and other councils spatial extents.

²⁹ See Appendix 3 for a list of and links to all relevant evidence presented on behalf of Kāinga Ora for Wellington Region IPI processes

- (a) Existing and planned rapid transit; or
- (b) Edge of city centre zones and metropolitan centre zones, or
- (c) Areas with a range of commercial activities and community services; or
- (d) Subject to my evidence being accepted, within and adjacent to Town Centre Zones in larger *Urban Areas*.

6.26 I have relied on time rather than distance as this allows each Council to consider such matters as topography and future proofs the definition in the event that connectivity is improved through future development such as subdivision and the construction of pedestrian bridges and walkways that are likely given the level of intensification anticipated through IPI plan changes.

6.27 The definition also regionalises the NPS-UD, particularly when read in conjunction with Policy 30 and 31 once these are amended to include additional centres, particularly Town Centres.

6.28 The definition stipulates a minimum of five minutes because this sets reasonable limits in order to achieve minimal benefits around centres and the Rapid Transit Network, is consistent with what has been applied across the region in relation to Centres and the Rapid Transit Network in larger *Urban Areas* or their equivalent, and this is what is typically used as a minimum by Tier 1 Councils around Aotearoa.

6.29 However, it is also necessary to consider how amendments to the definition of walkable catchment impact on other policies which include this term. Policies CC.1 and CC.2 include reference to walkable catchment as follows:

- Policy CC.1 relates to optimising transport demand by placing requirements on the design and construction of new and altered transport infrastructure to contribute to a reduction in greenhouse gas emissions. The policy sets out that this reduction is achieved by a hierarchy of outcomes including

locating development within a walkable catchment of public transport routes.

- Policy CC.2 (and Policy CC.2A as proposed through the Council’s supplementary evidence) relate to requirements for travel choice assessments for certain development. The travel choice assessment must demonstrate how public and active transport modes will be maximised and private vehicle usage minimised as well as proposing measures within the development to achieve these outcomes. Both policies include minimum thresholds for when a travel choice assessment is required, and district and city councils must adopt these as the basis for forming their own thresholds. The regional threshold is set at:
 - 100 residential units located within a walkable catchment
 - Commercial development of 2,500m² gross floor area
 - Greenfield subdivision over 100 residential units.

6.30 As policy CC.1 includes reference to where the walkable catchment applies i.e. “within a walkable catchment of public transport routes” I consider the proposed amendment to the definition appropriate for this policy.

6.31 In terms of policy CC.2, my recommended amendment to the definition has greater relevance and requires a consequential change as the requirement to provide a travel choice assessment will hinge on whether a development is located within a walkable catchment or not.

6.32 In my opinion there are a number of options which could be adopted to ensure that policy CC.2A clearly articulates the threshold based on my proposed definition of walkable catchments (red text Council’s supplementary evidence and blue text recommended amendments):

- a) Amend the policy to cross reference to policy 31 which references where the walkable catchment applies:

100 residential units located within a walkable catchment referred to in policy 31(a)(ii).

- b) Remove the reference to walkable catchment and greenfield subdivision and simply include a requirement for any development over 100 residential units.
- c) Amend the policy to specify where the walkable catchment applies (this would be the same as policy 31(a)(ii) but just articulated rather than referring to that policy):

100 residential units located within a walkable catchment of existing and planned rapid transit, or edge of the City Centre, Metropolitan, and larger Town Centre zones or areas with a range of commercial activities and community services.

6.33 The explanation for Policy CC.2A indicates that the travel choice thresholds “*reflect the differences in connectivity and accessibility between rural and urban areas.*” However, as drafted it is unclear whether the intention is for the threshold to apply to all urban areas (which may include areas outside of a walkable catchment) or just areas within a walkable catchment i.e. close to existing or planned rapid transit or at the edge of a centre zone.

6.34 If the aim of the policy is to set a threshold of 100 residential units for any urban area, then the threshold limits should be simplified as follows (red text Council’s supplementary evidence and blue text recommended amendments):

Activity and Threshold per application
<u>Any development for</u> 100 residential units located within a walkable catchment
Commercial development of a 2,500m ² gross floor area
<u>Greenfield subdivision over</u> 100 residential units

6.35 If the aim of the policy is to set a threshold solely in relation to development within a walkable catchment, then I would recommend proposed option (c) above.

7. SUMMARY OF PROPOSED WORDING CHANGES SOUGHT

7.1 Copies of the proposed additional changes are included in **Appendix 1** of my evidence. I confirm that the version of relief in my evidence represents the full “updated” set of relief requested by Kāinga Ora in relation to this hearing topic.

8. CONCLUSION

8.1 In conclusion, I am of the opinion that the amendments sought by Kāinga Ora (as outlined in my evidence) are appropriate and will assist in improving the consistency, usability and interpretation of provisions with the PC1 and the wider RPS. This will include how provisions are interpreted by both plan users and Councils within the Wellington region and nationally.

8.2 In accordance with section 32AA of the RMA, I consider that the amendments to the provisions are the most appropriate means of achieving the RMA as outlined in **Appendix 2**.

8.3 Overall, I consider that the amended provisions will be efficient and effective in achieving the purpose of the RMA (including proposed changes to objectives), relevant objectives of the RPS and other relevant statutory documents.

Matthew Cecil Heale

15 September 2023

Appendix 1 – Proposed Text Changes

Black Text – Original wording from PC1 and Officer’s recommended amendments, as set out in the Section 42A report.

Red Text – Additional amendments proposed by Kāinga Ora

Policy 30: Maintaining and enhancing the viability and vibrancy of ~~regionally and locally significant~~ centres – district plans

District plans shall include policies, rules and/or methods that enable and manage a range of land use activities that maintain and enhance the viability and vibrancy of:

1. the ~~regionally significant central business district of~~ Wellington City Centre;

2. ~~other regionally significant~~ the Metropolitan centres across the Wellington region:

i. Upper Hutt;

ii. Lower Hutt;

iii. Porirua;

iv. Paraparaumu;

v. Masterton;

vi. Johnsonville; ~~and~~

vii. Kilbirnie; and

viii. Petone

3. the ~~locally significant~~ Town centres across the Wellington region of Suburban centres in:

Larger Urban Area

i. Petone;

i. Miramar;

ii. Tawa;

iii. Newtown;

iv. Naenae;

v. Waterloo;

vi. Mana;

vii. Paraparaumu Beach;

viii. Waikanae;

ix. Raumati Town;

Smaller Urban Area

x. Ōtaki Main Road;

xi. Ōtaki Township;

xii. Featherston;

xiii. Greytown

xiv. Carterton; and

xv. Martinborough.

4. **Other** local and neighbourhood centres that provide for the **daily and weekly** needs of their residential catchments.

Explanation

Policy 30 identifies the hierarchy of regionally and locally significant centres within the Wellington Region. The centres identified are of significance to the region's form for economic development, transport

movement, civic or community investment. These centres are identified as City Centre, Metropolitan Centre, Town Centre, and Local and Neighbourhood centres.

By identifying these centres and in enabling their planned purpose and role in the urban environment and wider region, Policy 30 is intended to help achieve a regional form that deliver other outcomes identified in the RPS. This includes, reducing greenhouse gas emissions, ensuring an equitable access to commercial and community services, economic development, and land use-transport integration.

District plans are required to identify these centres and include provisions that enable them to achieve their planned purpose and role. Maintaining and enhancing the viability and vibrancy of these centres is important in order to encourage investment and development that supports an increased range and diversity of activities. It is also important for their prosperity and resilience in the face of social and economic change.

The Wellington City Centre is identified as the regional main central business district ~~is the major and only city~~ centre in the Wellington region; the other key centres across the region are also regionally significant and provide significant for business, retailing and community services. This policy does not limit territorial authorities from identifying additional centres of local significance within the district plan.

Policy 31: Enabling intensification to contribute to well-functioning urban areas – district plans

District plans shall include policies, rules and/or methods that enable intensification within urban areas where it contributes to a compact, well-designed, climate-resilient, accessible and environmentally responsive regional form with well-functioning urban areas (as articulated in Policy UD.5) by:

(a) For any tier 1 territorial authority, identifying a range of building heights and urban form densities to:

(i) realise as much development capacity as possible in the city centre zones; and

(ii) enable *high density development* within: Metropolitan Centre zones and Town Centre Zones in Larger urban areas; and ~~any other locations~~, within a walkable catchment of:

1. existing and planned rapid transit; or
2. edge of City Centre zones, ~~and~~ Metropolitan Centre zones and Town Centres in Larger urban areas; or
3. areas with a range of commercial activities and community services; and

(iii) enable medium density development; and

(iv) otherwise reflect the purpose of, and level of commercial activities and community services within, town, local and neighbourhood centres; and

For any other territorial authority not identified as a tier 1 territorial authority, identifying areas for greater building height and urban form densities:

(i) within, and adjacent to Town Centre zones where appropriate; and

(ii) where there is good access to existing ~~and~~ or planned active and public transport and a range of commercial activities and community services; and/or

(iii) to meet relative demand for housing and business use in that location.

Policy 57 – Integrating land use and transportation – consideration

When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, for

subdivision, use or development, seek to achieve integration between land use and transport planning within the Wellington Region in a way which:

(a) supports a safe, reliable, equitable, inclusive and efficient transport network; and

(b) supports connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity; and

(c) minimises private vehicle travel and trip length while supporting mode shift to public transport or active modes and support the move towards low and zero-carbon modes; and

(d) provides for well-connected, safe and accessible multi modal transport networks while recognising that the timing and sequencing of land use and public transport may result in a period where the provision of public transport may not be efficient or practical; and

(e) supports and enables the growth corridors [and the Rapid Transit Network](#) in the Wellington Region [as illustrated in Figure 3](#), including:

i. Western Growth Corridor – Tawa to Levin;

ii. Eastern Growth Corridor – Hutt to Masterton;

iii. Let's Get Wellington Moving Growth Corridor;

[iv. The Johnsonville Rail Line](#); and

(f) minimises the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors.

Explanation

Progress towards the Wellington Regional Land Transport Plan key outcomes cannot be achieved by that Strategy alone. Subdivision, use and development decisions also need to consider impacts on the Strategy's outcomes. Policy 57 lists matters that need to be considered for all proposals that affect land transport outcomes. It seeks to align

with the Wellington Regional Land Transport Plan and support decarbonising the transport system in the Wellington Region.

Policy CC.2A: Travel choice assessment local thresholds – district plans

By 30 June 2025, district plans shall include local thresholds for travel choice assessments as required by Policy CC.2. As a minimum, city and district councils must use the regional thresholds set out in Table 1 as the basis for developing their own local thresholds. The regional thresholds in Table 1 will cease to apply when Policy CC.2A is given effect through a district plan. To contribute to reducing greenhouse gas emissions city and district councils must develop their own travel choice thresholds that are locally specific.

Table 1: Regional Thresholds

Activity and Threshold per application
Any development for 100 residential units located within a walkable catchment
Commercial development of a 2,500m ² gross floor area
Greenfield subdivision over 100 residential units

Walkable Catchment Definition

A walkable catchment is an area ~~generally that an average person could walk from a specific point to get to multiple destinations. A walkable catchment~~ consisting of a minimum of five minute and a maximum 20-minute average walk, ~~or as otherwise identified by territorial authorities in district plans.~~

Appendix 2 – S32 AA Assessment

Option 1 - PC1 Amendments to Policy 30, 31, and 57

Option 2 - Kainga Ora Amendments to 30, 31, and 57

Option 3 – High Level principles that District Plan centres provisions need to meet (similar to NPS-UD policy 3)

	Option 1	Option 2	Option 3
Efficiency and Effectiveness	<p>Amendments are not directive enough and inconsistency in terminology (regional and local centres vs Metropolitan and Town Centres) between Policy 30 and 31 will lead to inefficiencies in Plan Changes and hearing decisions at district plan level.</p> <p>If Policy 31 does not refer to Town Centres or Locally Significant Centres there is a disconnect between the policies that will create uncertainty leading to a lack of effectiveness and efficiency at the implementation stage.</p> <p>Policies will effectively mimic NPS-UD which create inefficiencies due to a lack of regional context.</p>	<p>Amendments to Policy 30, 31, and 57 will create greater certainty and will be easier to implement leading to more effective and efficient implementation via decisions and future plan changes required to meet Planning Standards requirements or any private plan changes in the future.</p> <p>Amendments provide a regional interpretation of the NPS-UD which will also lead to implementation efficiencies and increased effectiveness due to added regional context.</p> <p>Differentiating between Larger and Smaller Urban Areas will create more certainty of outcome.</p> <p>Plan changes will need to give effect to the RPS once operative which means Centres typologies will not need to be relitigated resulting in efficiencies.</p>	<p>Principles would largely mirror the NPS-UD which will not be efficient or effective as individual Councils or Private Plan change applicants will need to interpret anticipated outcomes for a regional context.</p>
Costs/Benefits	<p>There will be additional costs of having to justify District Plan changes to centres as outcomes are not clearly articulated.</p> <p>District/City Councils and private plan changes will have additional flexibility around lower order centres.</p>	<p>There should be reduced costs as future Plan changes will not have to relitigate centres typologies or density outcomes for lower order Town Centres and the Johnsonville Rail line.</p> <p>Increased certainty for Plan users due to common phrasing between policies will reduce costs.</p> <p>Action via the IPI process will lead to less costs due to limited appeal rights.</p> <p>Still flexibility for lower order centres (Local and Neighbourhood).</p>	<p>Additional interpretation costs at implementation stage.</p> <p>Regional inconsistencies may undermine cross boundary centre performance (eg) if Tawa gets too big it may undermine Porirua or Johnsonville.</p> <p>Increased flexibility.</p>

Risk of acting/not acting	Risk of acting is duplication of effort at district/city level and uncertainty.	Action will create a clear link between RPS policies and create more certainty for implementation at District/City level. Action now via the IPI process will also benefit from limited appeal rights.	Action will create interpretation costs but increased flexibility at implementation stage.
Decision about more appropriate action	Option 2 is considered the most efficient and effective as the amended policies will provide useful regional context about intensification outcomes that will increased certainty and reduce future implementation and appeal costs. There will still be flexibility for lower order centres where regional consistency is less critical.		

Appendix 3 – Synopsis of previous District Plan evidence about changes to the Centres hierarchy

Key reasons for changes to the centres hierarchy across the Wellington Region:

1. There are key differences between Metropolitan (MCZs), Town (TCZs) and Local (LCZs) Centre Zones, as outlined in an assessment of the National Planning Standards and other district plans across New Zealand³⁰;
2. The NPS-UD requires different levels of intensification, through variations to building heights and densities within and adjacent to Centres depending on where they sit in the Centre hierarchy;
3. Standard 8 of the National Planning Standards distinguishes between Centre types by the catchments they serve. LCZs serve the needs of the residential catchment and TCZs serve the needs of immediate and neighbouring suburbs, while MCZs serve a sub-regional catchment (see Journey to Work maps below);
4. There is a need for regional consistency across the Wellington Region both in terms of the Regional Policy Statement and district plans;
5. Technical work such as the Wellington Outer Suburbs Assessment and Evaluation Report 2020, the Retail and Market Assessment for Wellington City Council Colliers International Sense Partners 2020, the Journey to Work analysis (refer maps below), and Mr Cullen's evidence from WCC Hearing Stream 1 (February 2023), indicate that the proposed TCZs have stronger levels of services and a wider catchment than LCZs.
6. Evidence by Mr Cullen has outlined that the proposed TCZ and the application to Tawa, Newtown and Miramar, have a much greater level of commercial and community services than other LCZs³¹;

³⁰ Statement of evidence of Matthew Heale (Planning), WCC Hearing Stream 1 – 7 February 2023, Paragraph 4.42 to 4.66 (refer below for a link to evidence)

³¹ Statement of evidence of Michael Cullen (Urban Economics), Hearing Stream 4 - 10 June 2023, Paragraph 5.12 (refer below for a link to evidence)

7. Mr Cullen's evidence for both Hearing Streams 1 and 4 of the Wellington City PDP and the Kāpiti Coast District Plan Change 2 hearing³² indicates that "more is better" in terms of achieving NPS-UD growth targets. As a result, the inclusion of a comprehensive list of TCZ's is justified in the Centres hierarchy.
8. WCC Council's technical evidence supports the inclusion of a TCZ in the Centres hierarchy;³³
9. Mr Rae's Urban Design evidence indicates that increased height limits (36m) can be accommodated without generating significant urban design impacts in the proposed WCC TCZs³⁴;
10. Overall Town Centres should be included in the Centres hierarchy in PC1 because this would create national and regional consistency, is supported by urban design and economic technical work, and there is a need to differentiate between density outcomes at a policy level.
11. The Centres Analysis Table presented in WCC Hearing Stream 4 below also shows centre characteristics that justifies a more comprehensive list of centres in Policy 30.

³² Statement of evidence of Michael Cullen (Urban Economics), 10 March 2023, Paragraphs 9.1 to 9.6 (refer below for a link to evidence).

³³ Sense Partners and Colliers Retail and Market Assessment Report 2020

³⁴ Statement of evidence of Nicholas Rae (Urban Design), Hearing Stream 4 – 12 June 2023, section 6 (refer below for a link to evidence)

LOCATION OF COMMERCIAL ZONE	ZONING		EMPLOYMENT CATEGORY & PEOPLE 2022 Business Demographics				JOURNEY TO WORK CATCHMENT (see Maps in Evidence – Source 2018 Census)	STRATEGIC COMMENTS Commercial/community facilities/recreation/residential activities	Size of Commercial Zone	
	PDP Classification	KO submission	Retail Trade	Food & Bev	Other	Total			PDP	With KO Expansion
Wellington CCZ (includes extension into Adelaide Road)	City Centre	City Centre	5315	5831	76051	87197	Regional Walking 14793 Total 72404	Primary commercial centre for the Wellington region. Full range of commercial, community, civic, recreation and residential activities. Includes range of national institutions and seat of government. Strong retail and associated pedestrian environment. Zone interfaces with Port and residential areas. Strong public transport network connections.	150ha	NA
Kilbirnie	Metropolitan Centre Zone	Metropolitan Centre Zone	540	200	1760	2500	Regional Walking 207 Total 1806	Full range of commercial, community, recreation, and residential activities. Includes: Supermarkets, Cafes, Bars, Restaurants, Retirement, Gyms, Swimming Pool, faith-based centres, Banks, Community Centre, Professional & Personal Services, Recreation Centre, sports fields, library, medical services. Range of education facilities. Regional FENZ training facility. Strong public transport network connections.	10.30ha	12.57ha
Johnsonville	Metropolitan Centre Zone	Metropolitan Centre Zone	480	570	1354	2304	Regional Walking 165 Total 1557	Full range of commercial, community, recreation, and residential activities. Includes: Supermarkets, Government Agencies, faith-based centres, Library, community centre, Swimming Pool, Recreation Centre, sports fields, Motels, Banks, Professional & Personal Services. Medical services. Range of education facilities. Light Industrial Services. Fire station. Strong public transport network connections (including Jville train station and line – RTS).	13.71ha	18.5ha
Tawa	Local Centre Zone	Town Centre Zone	420	55	1323	1798	Regional Walking 99 Total 984	Commercial <ul style="list-style-type: none"> • Services both local suburb and broader residential catchment • Has an active and vibrant pedestrian/retail environment. • Range of professional & personal services • Strong convenience based and retail offerings (particularly along the main road) • Supermarkets • Close to various business/light industrial working environments • Cafes, restaurants, and general hospitality activities Community <ul style="list-style-type: none"> • Community centre and library • Multiple Schools, Child Care, Learning Centres • Faith-based centres (many churches) • Health services Recreational <ul style="list-style-type: none"> • Sport Halls (AFC, Badminton, Aikido, Squash Club) • Numerous recreation grounds, playgrounds, and walking tracks 	4.29ha	5.3ha

LOCATION OF COMMERCIAL ZONE	ZONING		EMPLOYMENT CATEGORY & PEOPLE 2022 Business Demographics				JOURNEY TO WORK CATCHMENT (see Maps in Evidence – Source 2018 Census)	STRATEGIC COMMENTS Commercial/community facilities/recreation/residential activities	Size of Commercial Zone	
	PDP Classification	KO submission	Retail Trade	Food & Bev	Other	Total			PDP	With KO Expansion
								<ul style="list-style-type: none"> In recognition of the interrelationship between enabling higher densities to maximise growth around centres and development within centres themselves, the residential area around Newtown has been up-zoned to HRZ. <p>Transport</p> <ul style="list-style-type: none"> Strong public transport network connections. 		
Miramar	Local Centre Zone	Town Centre Zone	175	55	1206	1437	Regional Walking 147 Total 1524	<p>Commercial</p> <ul style="list-style-type: none"> Strong convenience and retail services. Supermarket Personal & Professional Services Bars, Cafes, Restaurants and general hospitality services Main centre that services the nearby regionally strong business/light industrial working environment (including WETA and Camperdown Studios) <p>Community</p> <ul style="list-style-type: none"> Multiple Schools, Child Care, Learning Centres Faith-Based and cultural centres Library Health services <p>Recreational</p> <ul style="list-style-type: none"> Sports Halls/Clubs Gyms Recreation grounds, sports fields, playgrounds and walks <p>Residential</p> <ul style="list-style-type: none"> Centre surrounded by large residential catchment Examples of medium scale apartments within immediate proximity of centre In recognition of the interrelationship between enabling higher densities to maximise growth around centres and development within centres themselves, the residential area around Miramar has been up-zoned to HRZ. <p>Transport</p> <ul style="list-style-type: none"> Strong public transport network connections. Route 2 (Karori, Wellington, Hataitai, Miramar, Seatoun) On peak 9am to 9pm 5-10mins Off Peak 6am to 9am and 9pm to 12am (15-20 mins) 	2.33ha	5.58ha

LOCATION OF COMMERCIAL ZONE	ZONING		EMPLOYMENT CATEGORY & PEOPLE 2022 Business Demographics				JOURNEY TO WORK CATCHMENT (see Maps in Evidence – Source 2018 Census)	STRATEGIC COMMENTS Commercial/community facilities/recreation/residential activities	Size of Commercial Zone	
	PDP Classification	KO submission	Retail Trade	Food & Bev	Other	Total			PDP	With KO Expansion
Linden	Local Centre Zone	Local Centre Zone	6	65	50	121	Local/Neighbourhood Walking 0 Total 201	Commercial <ul style="list-style-type: none"> A few convenience-based shops and takeaway Community <ul style="list-style-type: none"> School and childcare, church and school hall Recreational <ul style="list-style-type: none"> Sports Hall and grounds Public Transport <ul style="list-style-type: none"> Train station on the Kāpiti commuter network 	1.38ha	1.38ha
Churton Park	Local Centre Zone	Local Centre Zone	120	140	196	456	Local Walking 24 Total 321	Commercial <ul style="list-style-type: none"> Community village that services local suburb. Includes Supermarket, cafes, restaurant/takeaway, personal services, Community <ul style="list-style-type: none"> Multiple Schools, Child Care Centres, Health services. Recreational <ul style="list-style-type: none"> Sports Halls/Clubs, Public Transport <ul style="list-style-type: none"> Bus network services the suburb. 	2.75ha	2.75ha
Newlands	Local Centre Zone	Local Centre Zone	120	45	57	222	Local Walking 36 Total 288	Commercial <ul style="list-style-type: none"> Community village that services local suburb. Includes supermarket, restaurant/takeaways, retail and convenience stores Community <ul style="list-style-type: none"> Multiple Schools, Child Care, Learning Centres, Community Centre, Faith-based centres, Community Hall, Health services, fire station. Recreational <ul style="list-style-type: none"> Sports Halls/Clubs, Playgrounds and recreation fields Public Transport <ul style="list-style-type: none"> Bus network services the suburb. 	1.70ha	1.70ha
Khandallah	Local Centre Zone	Local Centre Zone	140	210	320	670	Local Walking 75 Total 480	Commercial <ul style="list-style-type: none"> Community village that services the local suburb. Includes supermarket, cafes, restaurants/takeaways, retail and convenience stores, bank, Personal & Professional Services. Community <ul style="list-style-type: none"> Multiple Schools, Child Care, Learning Centres, Community Centre, Faith-based centres, Community Hall, Health services Recreational <ul style="list-style-type: none"> Sports Halls/Clubs, Playgrounds and recreation fields Public Transport <ul style="list-style-type: none"> Bus network services the suburb. Train Station(s) on Johnsonville Line 	1.46ha	1.46ha
Crofton Downs	Local Centre Zone	Local Centre Zone	170	18	282	470	Local Walking 9	Commercial <ul style="list-style-type: none"> Supermarket, Mitre10 Community	2.92ha	2.92ha

LOCATION OF COMMERCIAL ZONE	ZONING		EMPLOYMENT CATEGORY & PEOPLE 2022 Business Demographics				JOURNEY TO WORK CATCHMENT (see Maps in Evidence – Source 2018 Census)	STRATEGIC COMMENTS Commercial/community facilities/recreation/residential activities	Size of Commercial Zone	
	PDP Classification	KO submission	Retail Trade	Food & Bev	Other	Total			PDP	With KO Expansion
Island Bay	Local Centre Zone	Local Centre Zone	122	150	297	569	Local Walking 30 Total 546	Commercial <ul style="list-style-type: none"> Supermarket, Bars, Cafes, Restaurants, Cinema, Personal & Professional Services Community <ul style="list-style-type: none"> Health Services, Library, Child Care, School, Community Centre, Churches Recreational <ul style="list-style-type: none"> Shorland Park, Bowling club, close to beach, walkways Public Transport <ul style="list-style-type: none"> Bus network services main thoroughfare through the suburb. 	1.95ha	1.95ha
Hataitai	Local Centre Zone	Local Centre Zone	9	80	461	550	Local Walking 30 Total 318	Commercial <ul style="list-style-type: none"> Community village that services local suburb. Includes bars, cafes, restaurant, takeaways, retail and convenience stores, Personal Services, Community <ul style="list-style-type: none"> Churches, Child Care, School, Health Services Recreational <ul style="list-style-type: none"> Wellington Velodrome Netball courts Sports Halls/Clubs, Playgrounds and recreation fields Walkways Public Transport <ul style="list-style-type: none"> Bus network services the suburb. 	0.95ha	0.95ha

- Employment count and travel to work totals do vary, these are sourced from different Stats NZ sources, and were captured at different times – they do however aggregate the data to the same geographic regions.
- Employment count is sourced from the Statistical Business Register. The source for this is Stats NZ and was completed in February 2022: [New Zealand business demography statistics: At February 2022 | Stats NZ](#)
- Travel to work is a component of the NZ Census, sourced from Stats NZ and is a representation of the typical commute patterns. Not all respondents to the census complete this section, and as such doesn't provide 100% coverage of all commuters. Additionally, this is captured from the 2018 census so there is a temporal difference between this and the Statistical Business Register too. Source: [2018 Census – NZ.Stat tables | Stats NZ](#)

Relevant evidence presented on behalf of Kāinga Ora for Intensification Planning Instrument (IPI) hearings across the Wellington region:

Wellington City Council Proposed District Plan

Hearing Stream 1 – Strategic Direction

Statement of evidence of Matthew Heale (Planning), 7 February 2023:

<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/01/submitter-evidence/submitter-evidence--matt-heale-for-kainga-ora--submitter-id-391--fs89.pdf>

Statement of evidence of Michael Cullen (Urban Economics), 7 February 2023

<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/01/submitter-evidence/submitter-evidence--mike-cullen-for-kainga-ora--submitter-id-391--fs89.pdf>

Statement of evidence of Nicholas Rae (Urban Design), 7 February 2023:

<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/01/submitter-evidence/submitter-evidence--nick-rae-for-kinga-ora--submitter-id-391--fs89.pdf>

Hearing Stream 4 – Centres

Statement of evidence of Matthew Heale (Planning), 12 June 2023:

<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/04/submitter-evidence/kainga-ora---homes-and-communities/submitter-evidence--m-heale-for-kinga-ora-391--fs81.pdf>

Statement of evidence of Michael Cullen (Urban Economics), 10 June 2023:

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

[streams/04/submitter-evidence/kainga-ora---homes-and-communities/submitter-evidence--m-cullen-for-kinga-ora-391--fs81.pdf](https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/04/submitter-evidence/kainga-ora---homes-and-communities/submitter-evidence--m-cullen-for-kinga-ora-391--fs81.pdf)

Statement of evidence of Nicholas Rae (Urban Design), 12 June 2023:

<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/04/submitter-evidence/kainga-ora---homes-and-communities/submitter-evidence--n-rae-for-kinga-ora-391--fs81.pdf>

Hutt City Council Plan Change 56

Statement of evidence of Karen Williams (Planning), dated 29 March 2023:

<https://hccpublicdocs.azurewebsites.net/api/download/7210cb015bf3423eb849e753bed7dbae/districtplann/122073bd2822281df4420844ac4457c211457>

Statement of evidence of Nicholas Rae (Urban Design), dated 29 March 2023:

<https://hccpublicdocs.azurewebsites.net/api/download/7210cb015bf3423eb849e753bed7dbae/districtplann/2cb9204128225ebfa4847af317cfd94bf935b>

Upper Hutt City Council IPI

Statement of evidence of Alice Blackwell (Planning), 14 April 2023:

<https://www.upperhuttcity.com/files/assets/public/v/1/districtplan/ipi/upper-hutt-ipi-kainga-ora-evidence-of-alice-blackwell.pdf>

Statement of evidence of Michael Cullen (Urban Economics), 14 April 2023:

<https://www.upperhuttcity.com/files/assets/public/v/1/districtplan/ipi/upper-hutt-ipi-kainga-ora-evidence-of-michael-cullen.pdf>

Porirua City Council Variation 1

Hearing Stream 7 – Variation 1: Plan Change 19: Residential; and Commercial Zones

Statement of evidence of Karen Williams (Planning), 24 February 2023:

https://storage.googleapis.com/pdp_portal/pdps/hearing_stream7/submitter_evidence/Statement%20of%20Evidence%20-%20Kainga%20Ora%20-%20Karen%20Williams.pdf

Statement of evidence of Michael Cullen (Urban Economics), 24 February 2023:

https://storage.googleapis.com/pdp_portal/pdps/hearing_stream7/submitter_evidence/Statement%20of%20Evidence%20-%20Kainga%20Ora%20-%20Michael%20Cullen.pdf

Statement of evidence of Nicholas Rae (Urban Design), 24 February 2023:

https://storage.googleapis.com/pdp_portal/pdps/hearing_stream7/submitter_evidence/Statement%20of%20Evidence%20-%20Kainga%20Ora%20-%20Nicholas%20Rae.pdf

Kāpiti Coast District Council Plan Change 2

Statement of evidence of Karen Williams (Planning), dated 10 March 2023:

<https://www.kapiticoast.govt.nz/media/tgkpxwp4/s122-and-s122-fs-1-kainga-ora-karen-williams-statement-of-evidence-10-03-2023.pdf>

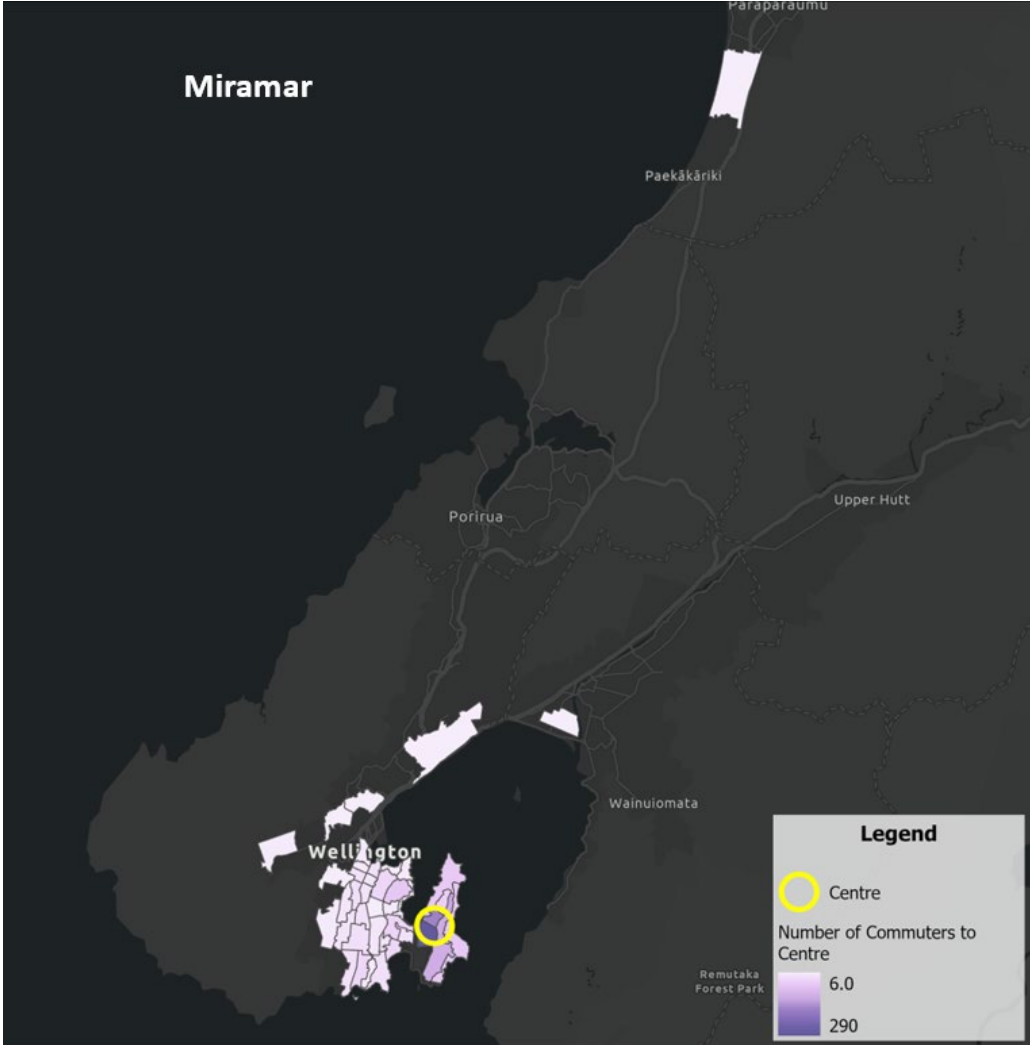
Statement of evidence of Michael Cullen (Urban Economics), dated 10 March 2023:

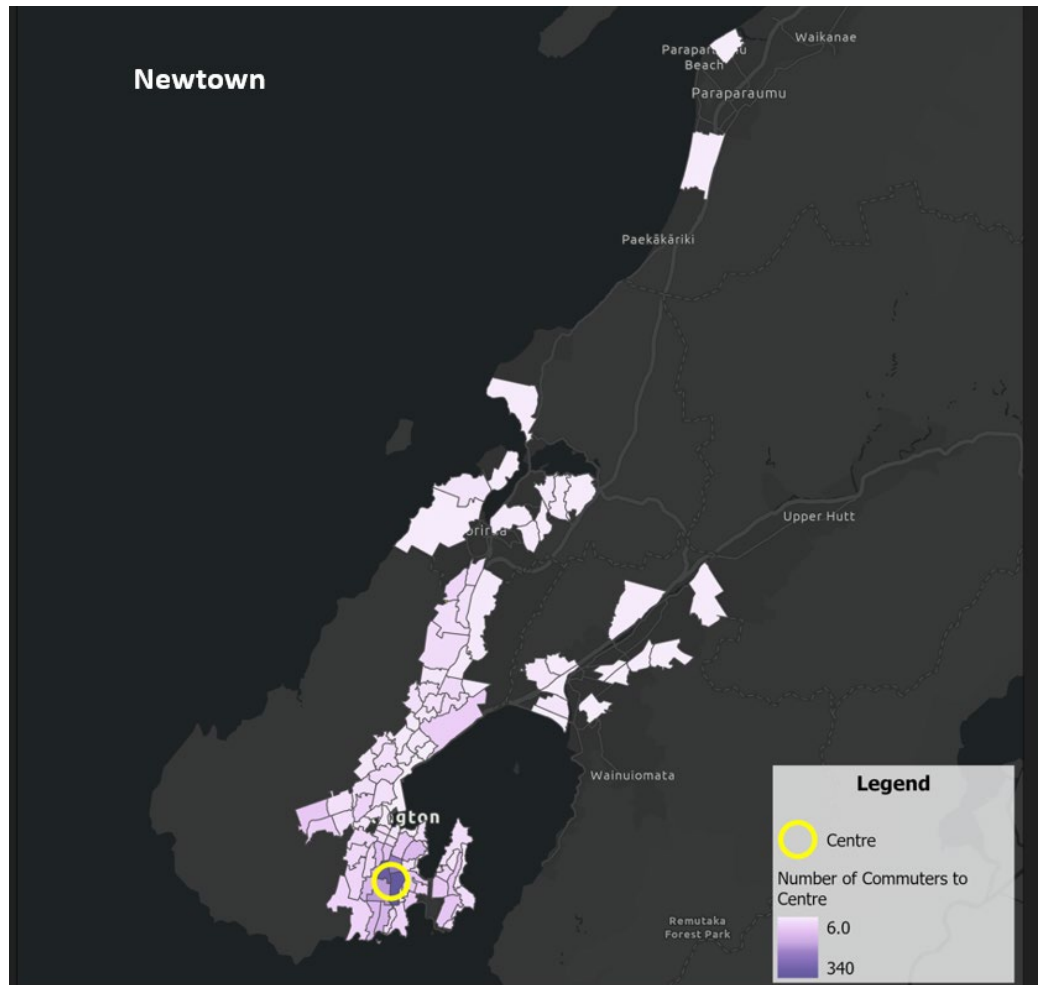
<https://www.kapiticoast.govt.nz/media/gxujewfb/s122-and-s122-fs-1-kainga-ora-michael-cullen-statement-of-evidence-10-03-2023.pdf>

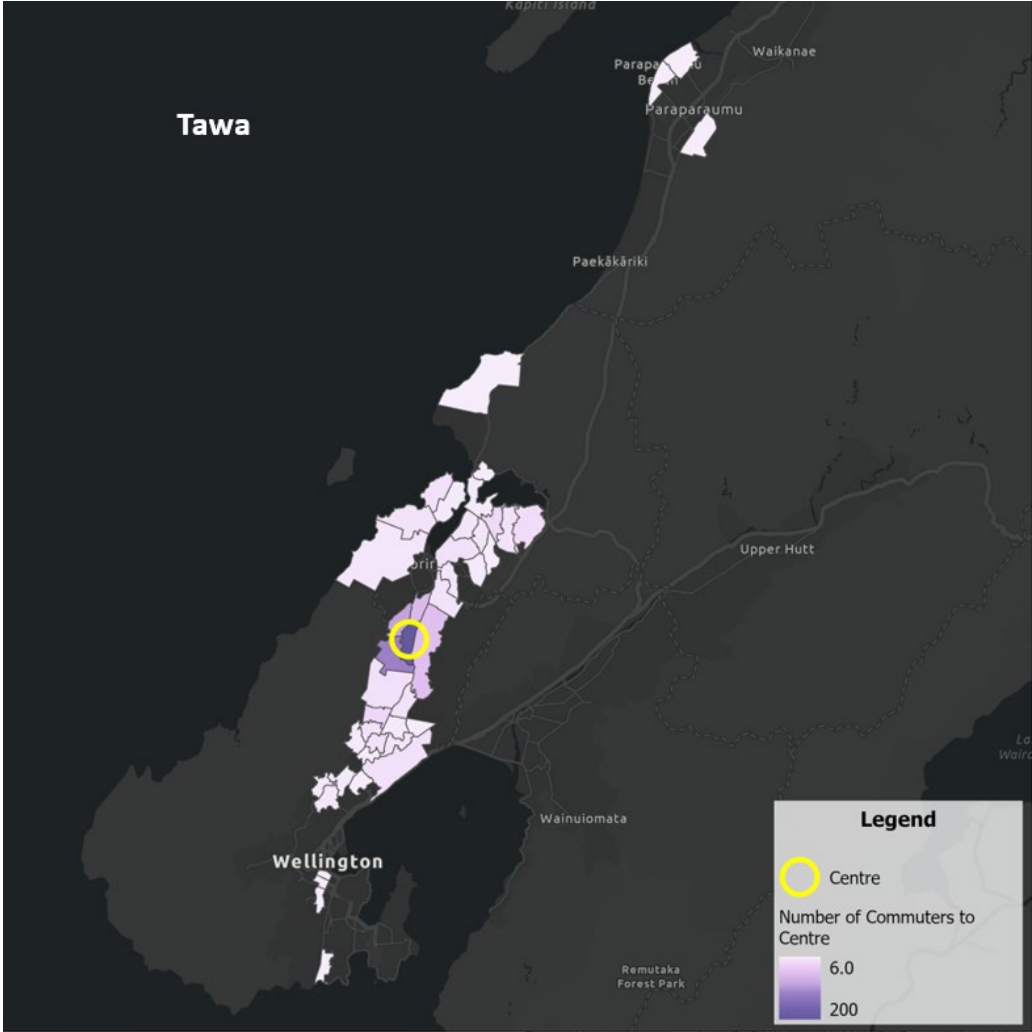
Statement of evidence of Nicholas Rae (Urban Design), dated 10 March 2023:

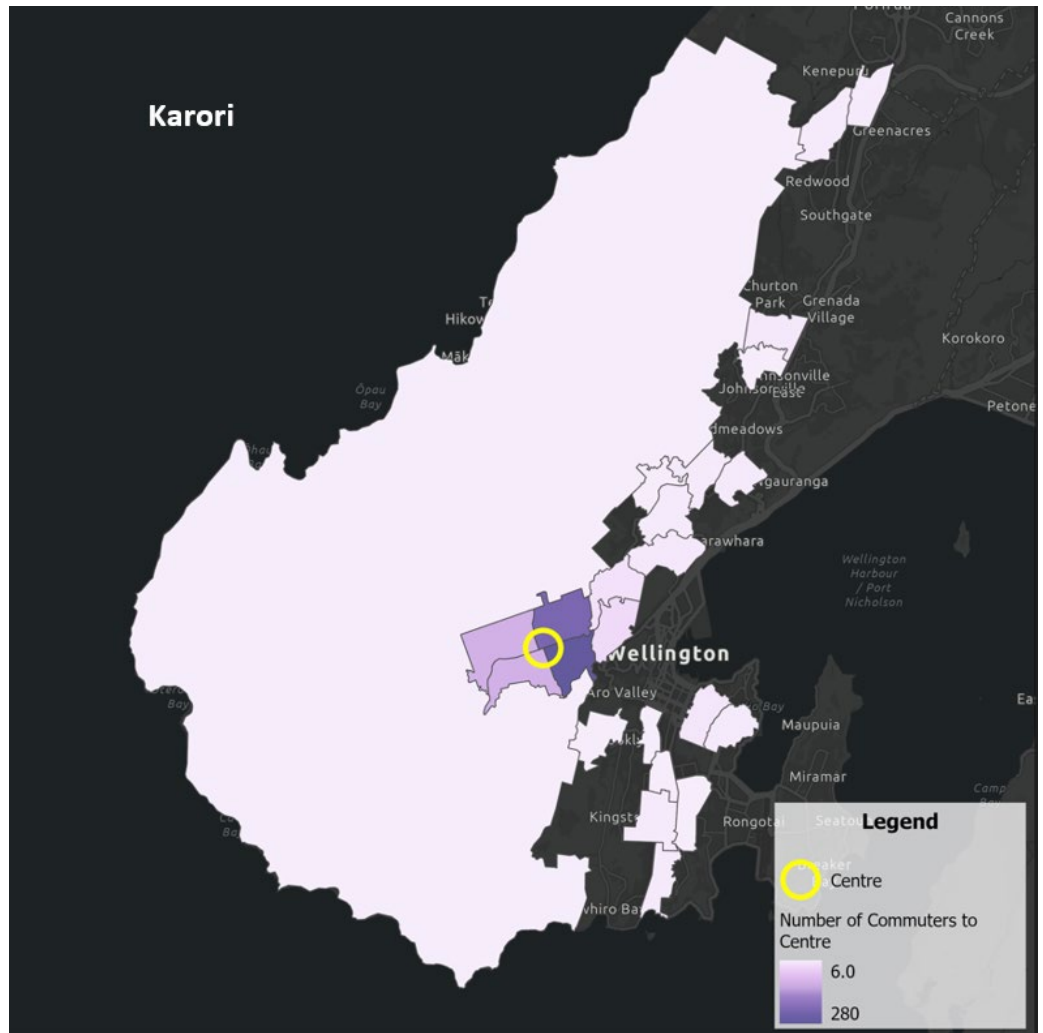
<https://www.kapiticoast.govt.nz/media/vfbjsvrd/s122-and-s122-fs-1-kainga-ora-nick-rae-statement-of-evidence-10-03-2023.pdf>

Journey to Work Maps

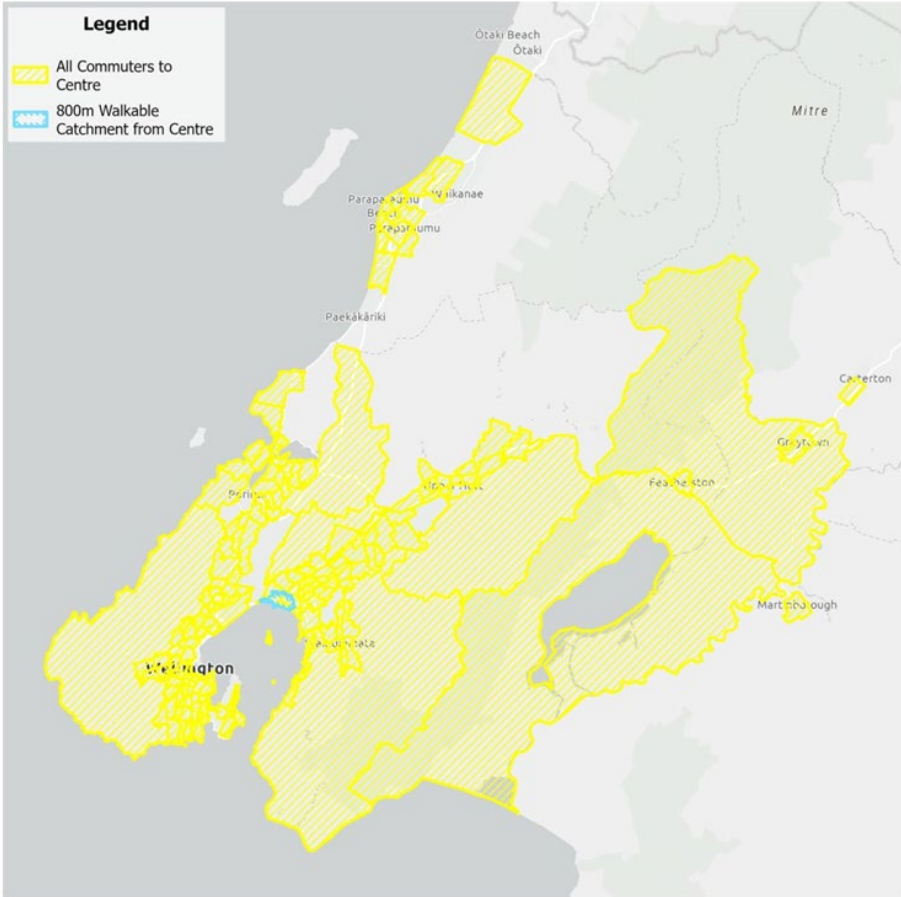








PETONE – JOURNEY TO WORK DATA – ALL COMMUTERS



Appendix 4 - Wellington Regional Growth Framework - Figure 3

