

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
AT WELLINGTON**

**I TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE  
O TE WHANGANUI-A-TARA**

**IN THE MATTER  
AND**

**of the Resource Management Act 1991**

**IN THE MATTER**

**of the hearing of submissions on Te Mahere  
ā-Rohei Tūtohua the Wellington City  
Proposed District Plan**

**HEARING TOPIC:**

Stream 1 - Strategic Direction

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**STATEMENT OF PRIMARY EVIDENCE OF NICHOLAS JAMES RAE  
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

**(URBAN DESIGN)**

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**Instructing solicitor:**

C E Kirman  
Special Counsel  
Kāinga Ora - Homes and Communities  
PO Box 14594  
Central Auckland 1051  
E: [claire.kirman@kaingaora.govt.nz](mailto:claire.kirman@kaingaora.govt.nz)

**Counsel Instructed:**

**BUDDLE FINDLAY**

Barristers and Solicitors  
Auckland

Solicitor Acting: **Jennifer Caldwell /  
Natalie Summerfield**

Email: [jennifer.caldwell@buddlefindlay.com](mailto:jennifer.caldwell@buddlefindlay.com)  
/ [natalie.summerfield@buddlefindlay.com](mailto:natalie.summerfield@buddlefindlay.com)  
Tel 64 9 363 0702 Fax 64 9 358 2055  
PO Box 1433 DX CP24024 Auckland 1010

## 1. EXECUTIVE SUMMARY

- 1.1 I generally support the Kāinga Ora submissions which seek to provide greater opportunity for residential density than recommended in the section 42A report for Hearing Stream 1.
- 1.2 I support the Kāinga Ora submission<sup>1</sup> that seeks to introduce a Town Centre zone within the centres hierarchy, and Miramar, Newtown and Tawa are identified as being appropriate as Town Centres, as they provide good development opportunities on flatter land where the population could readily be increased to support these centres with a Town Centre function.
- 1.3 I consider that the centres need to respond to the opportunity for residential growth around them in terms of the range of activities and services, and the scale of the centre zone.
- 1.4 I support the Kāinga Ora view that convenient walkable locations around all centres provide an opportunity for higher density residential outcomes.
- 1.5 The topography of Wellington City is generally more challenging than many other New Zealand urban environments, and I consider that where possible the maximum residential opportunity should be enabled at centres which are generally on the flatter land.
- 1.6 I support high density opportunities around stations or stops on Rapid Transit Services as I consider this approach meets the National Policy Statement on Urban Development (**NPS-UD**) requirements,<sup>2</sup> while consistent with good urban design principles of enabling easy use of public transport by as many people as possible.
- 1.7 This aligns with the recommendation in the section 42A report, and which confirms that the Johnsonville Rail Line is a Rapid Transit Service.
- 1.8 The National Policy Statement on Urban Development requires Wellington District Plan to provide for building heights of at least 6 storeys within at least a walkable catchment of: existing and planned

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<sup>1</sup> Submission 391.2.

<sup>2</sup> NPS-UD, Objective 3(b), Policy 1, Policy 3(c).

rapid transit stops; the edge of city centre zones; the edge of metropolitan centre zones.<sup>3</sup>

- 1.9 Redevelopment within the walkable catchments is intended to contribute to achieving well-functioning urban environments, which promote walking to services and facilities, and using public transport. In my opinion, these environments need to achieve the principles of walkability and the key principles of urban design, which in addition to distance, include the quality of the physical environment resulting in a walk that is useful, safe, comfortable, and interesting. Many of the areas within proposed walkable catchments do not exhibit these qualities, however I consider that the NPS-UD requires an opportunity for these to be improved.
- 1.10 I consider that basic distance parameters based on time should be used as a starting point for defining the walkable catchments, then adjusted as required to be larger or smaller depending on the context at each location.
- 1.11 There are different opinions on the walking speed for an average person (who ever that might be), with the Council research resulting in a slower speed than other publications, which in turn result in different sized walking catchments.
- 1.12 There is opportunity for higher forms / density of development for people who are prepared to walk further than average and this should be encouraged.
- 1.13 The walkable catchment around each Rapid Transit Service station should have a starting point of 800m or a 10 minute walk, which better achieves the NPS-UD than the application of a 5 minute catchment as recommended in the section 42A report. I understand the NPS-UD encourages larger areas of high density rather than to limit, unless there is good reason to do so. I consider the section 42A methodology is too focused on the existing qualities of places which in the section 42A author's opinion generally supports the reduction of a walkable catchment.

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<sup>3</sup> NPS-UD, Policy 3(c).

- 1.14 I consider 1200m is an appropriate starting distance to determine the walkable catchment around the city centre, but there are some areas where up to 1500m would also be suitable.
- 1.15 I consider that the Kāinga Ora maps should be refined, and I propose to provide revised maps at subsequent hearings.
- 1.16 The zone provisions can then be considered which may result in different built form standards for different locations.
- 1.17 I have reviewed the proposed changes to the text as recommended by the section 42A report and further changes recommended by Mr Heale set out in his Appendix 5, and to the extent they are urban design related, I support the changes as they reflect my findings and advice.
- 1.18 Regarding character areas, I consider proposed changes to UFD-O8 as included in Mr Heale's Appendix 5 are appropriate, as it is important to be clear that the character of the place is expected to change but to what degree. The change should occur recognising and responding to the values associated with the character.

## **2. INTRODUCTION**

- 2.1 My full name is Nicholas James Rae. I am an Urban Designer and Landscape Architect. I am the Director of Transurban Limited, consultants on urban development. I hold a Master of Urban Design from the University of Sydney and a Bachelor of Landscape Architecture (Honours) degree from Lincoln University. I have approximately 23 years' experience in this field in New Zealand, the United Kingdom, France, Portugal, Saudi Arabia, and Australia.
- 2.2 I regularly provide advice on urban design and landscape matters, followed by urban design and visual assessments for development proposals including a range of residential, retirement villages, subdivisions for large greenfield sites, commercial office and retail spaces, and industrial developments. I have also provided advice on a number of plan changes relating to urban development. I have experience with the detailed design, consenting and implementation of development projects.

- 2.3 I have been involved in a number of plan review and plan change processes, including:
- (a) Proposed New Plymouth District Plan – Assisted Kāinga Ora following submissions with analysis, advice and provided evidence to the hearings panels on the topics of viewshafts, residential, commercial and mixed use zones and zone application.
  - (b) Plan Changes 51 and 61 to the Auckland Unitary Plan (“AUP”) – reviewed the proposed private plan changes for Drury West and provided evidence to support submissions with regard consideration of Town Centre, Local Centre, Terrace House and Apartment, and Mixed housing Urban zones near a proposed new rail station in the Drury growth area.
  - (c) Central Hawke’s Bay District Plan - I have provided evidence to the Proposed District Plan relating to intensification provisions.
  - (d) Plan Change 26 in Tauranga City –assessment of the proposed intensification in the Te Papa peninsula in Tauranga city in regard to the existing viewshafts that seek to retain views to the Mauao (Mt Manganui).
  - (e) Plan Change 67 to the AUP – assisted with drafting changes to an existing precinct applying to approximately 200ha of land in Hingaia Auckland, and providing evidence to an independent hearing.
  - (f) Proposed Auckland Unitary Plan - I provided evidence to the Independent Hearings Panel hearings on the proposed AUP for private land holders.
  - (g) America’s Cup Resource consent – I provided advice and evidence on behalf of resident groups in the Viaduct Harbour in relation to the visual effects of the proposed America’s Cup development proposed. This included consideration of the effect on lower order views along streets and within the Viaduct harbour.

- (h) Plan Change to rezone the western side of the airport at Frankton (Queenstown) – This involved providing advice and evidence on behalf of a submitter on the importance and management of views to the Remarkables mountain range.
- (i) Kingseat – Proposed concept plan to support submissions on the then Franklin District Plan Rural Plan Changes, which was followed closely being involved in the AUP processes. This considered a wider area of land than originally proposed at a scale that would better provide for and support the local community with retail and school provisions. It suggested different commercial centre locations and roading networks along with some light industrial and residential zones. The concept was not taken up at that time.
- (j) Clarks Beach – Proposed masterplan, Precinct plan and zone provisions and evidence to support a Special Housing area proposed for 50ha of land in the then Future Urban Zone to the eastern end of the existing development at Clarks Beach. This included proposed new road alignments, comprehensive open space networks also providing for a new 'stream' and coastal outfall and coastal rehabilitation, a neighbourhood centre and a mix of residential opportunities. Approximately half of this is consented and of that 4/5ths of the subdivision has been constructed.
- (k) Silverdale South – Proposed an alternative development pattern and land use (a mixed use and residential outcome proposed) for the area known as PC123 to the Rodney District Plan which was approved, and then included into the AUP as a General Business zone and Mixed Housing Urban zone. This is land to the south and east of the Silverdale Busway station and park n ride facility. Significant development work is underway with many houses built along with commercial development constructed and consented. The Botanic Retirement village is now part of this development, providing for around 500 units south of the park n ride. I assisted with the design and consenting of that development.

- (l) Kumeu Town Centre – Masterplan, Precinct plan and provisions to support an application for a private plan change in Kumeu. This has resulted in a Town Centre zone and Mixed Housing Urban zone to the north east of the State Highway 16 and railway. Much of this is under construction, including buildings I have been involved with from a design perspective.
- (m) Takanini Town Centre (east) – Masterplan, Precinct provisions and evidence to support opposition to a Council Plan Change proposing the land at 30 Walters Road to be residential. This has resulted in a Town Centre zoning through both the original plan change and the AUP process consistent with the structure plan. The structure plan included a train station (new Takanini station) abutting the land, however no station has resulted even following the developer offering to build the platforms. The land has been developed and is largely retail with some medical, offices and real estate agents. The development won a Property Council award in 2015.
- (n) Rototuna North Centre – I was involved with the design of this centre for the landowner along with provision for residential and interfaces with the proposed Waikato expressway. I have not been involved with the more recent zoning and consenting and implementation of the centre.
- (o) Whilst not involved from a plan change perspective, I have assisted with the development of retail at Te Atatu Town Centre.
- (p) Rotorua Central – I provided advice to the master planning work for redevelopment of Rotorua Central which is a large block of land to the south of the Rotorua town centre.

2.4 I am also involved with providing advice and design direction for three recent retirement villages, apartment building proposals, terrace housing proposals, affordable housing solutions, significant landscape solutions including significant lengths of coastal, wetland and stream rehabilitation as part of urban development integrating access and providing high amenity open space.

- 2.5 I am a member of the Urban Design Forum, Resource Management Law Association and the New Zealand Institute of Landscape Architects.

### **Involvement with Kāinga Ora Submission**

- 2.6 I have visited the Wellington District over a two day period on 11 and 12 August 2022 where I visited locations on the public road network and reserves. This included significant time walking the central area of Wellington, Newtown, Mt Victoria, Mt Cook, and Kelburn to experience the existing urban fabric from a pedestrian perspective and to investigate recent developments.
- 2.7 I have been retained by Kāinga Ora – Homes and Communities (**Kāinga Ora**) to provide urban design advice and supporting evidence relating to the plan changes notified by the five district Councils in Wellington dealing with the application of the Medium Density Residential Standards (**MDRS**) and the National Policy Statement on Urban Development (**NPS-UD**). This is to ensure a consistent approach is applied where possible to the Wellington Region, understanding the relationships between the different districts.
- 2.8 I was instructed in July 2022 and undertook site investigations in August to assist with the preparation of the submissions particularly on the matters of walkable catchments, role and scale of centres, zone opportunities provision testing. I was assisted by Fabio Namiki of my office in our work. I had no involvement with the preparations of further submissions.
- 2.9 I also undertook a site visit with Mr Mike Cullen on 16 January 2023 where we focused on the centres in the Wellington region to assist with the consideration on the role and form of these.

### **Evidence of other experts**

- 2.10 I rely on the evidence of Mr Liggett, who sets out why Kāinga Ora is involved in this plan review process, and importantly, from my perspective, that the focus is not on individual land holdings owned by Kāinga Ora, but rather a focus on urban development outcomes more generally in Wellington City, as well as providing consistent planning policy across the Wellington Region and Aotearoa country that enables



well-functioning urban environments and the opportunity for growth and intensification of our cities with ease and confidence.

2.11 Where appropriate and relevant, my evidence will reference and rely on the evidence of Mr Matt Heale and Mr Michael Cullen.

**2.12** I have reviewed and reference the section 42A Report, and the statement of evidence of Ms Orla Hammond (walking speed and catchments) and the section 32 report Part 2: Character Precincts and the Mt Victoria North Townscape Precinct.

### **Code of Conduct**

2.13 Although this is a Council hearing, I have read the Environment Court's Code of Conduct for Expert Witnesses within Practice Note 2023, 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.

### **Scope of Evidence**

2.14 My evidence will address and is organised by the following matters:

- (a) Strategic Direction;
- (b) Role of Centres;
- (c) Role of Rail;
- (d) Walkable Catchment methodology;
- (e) Catchment definition;
- (f) Walking speeds verses distance;
- (g) Walkable catchments around centres;
- (h) Walkable catchments around Rapid Transit Stops;
- (i) Zones adjacent to centres and RTS;
- (j) Character Areas; and
- (k) Proposed wording changes sought.

### **3. STRATEGIC DIRECTION**

- 3.1 I rely on the statement of evidence for Mr Heale regarding the overall strategic direction. My considerations have included the objectives and policies and recommendations within the section 42A report and further provided by Mr Heale as these set the framework for responses and decisions throughout the plan. I consider the six parts to CC-O3 (Compact, Resilient, Vibrant and Prosperous, Inclusive and Connected, Greener, and Partnership with mana whenua) particularly relevant to urban design.

### **4. ROLE OF CENTRES**

- 4.1 I support the Kāinga Ora submission<sup>4</sup> that seeks to introduce a Town Centre zone within the centres hierarchy. I consider this would provide another opportunity for residential intensification within some centres, while providing more opportunities for employment and services to support the opportunity for a growing residential component around these centres, many of which are associated with an RTS.
- 4.2 My assessment resulted in questioning the scale and function of some of the centres such as Miramar, Newtown and Tawa respond to the policy direction of a compact well-functioning urban environment. I consider that the centres need to respond to the opportunity for residential growth around them in terms of the range of activities and services, and the scale of the centre zone. Mr Cullen addresses this from an economic perspective.
- 4.3 The greater range of services in a Town Centre also supports a wider walkable catchment where people are prepared to walk further. The centres identified above provide good development opportunities on flatter land.

### **5. ROLE OF RAIL**

- 5.1 The section 42A report helpfully summarises the classification of the Johnsonville Rail Line and the author concludes that it should be classified as a Rapid Transit Service with stops along the line<sup>5</sup> (I refer to

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<sup>4</sup> Submission 391.2.

<sup>5</sup> Section 42A report Para 201.

the stations on the rapid transit service as “RTS”). I have no evidence or experience to dispute this, and my considerations and recommendations are on the basis that this classification is confirmed. I understand that there is no dispute that the Kapiti Coast Rail Line or other rail lines within the Wellington City Council boundary are a Rapid Transit Service.

- 5.2 The section 42A report recommends that, on the basis the Johnsonville Line is a Rapid Transit Service, the High Density Residential zone (**HDZ**) should be applied around the stations on this line, representing a change from the notified maps where the Medium Density zone (**MDZ**) was proposed around a number of these stops.
- 5.3 This recommendation is in line with the submission by Kāinga Ora (and others), except for the extent of land to which the HDZ applies.
- 5.4 I support high density opportunities around RTS as I consider this approach meets the NPS-UD requirements<sup>6</sup>, while consistent with good urban design principles of enabling easy use of public transport by as many people as possible.

## **6. WALKABLE CATCHMENT METHODOLOGY**

- 6.1 The NSP-UD requires the Wellington District Plan to provide for building heights of at least 6 storeys within at least a walkable catchment of: existing and planned rapid transit stops; the edge of city centre zones; the edge of metropolitan centre zones.<sup>7</sup>
- 6.2 Walkable catchments can also be used to define areas around town centres, local centres and neighbourhood centres, although the NPS-UD does not require this as a method to be used, rather greater flexibility is provided to determine building heights and densities in these areas.
- 6.3 The walkable catchment is not prescribed in the NPS-UD, and there are various methods that have been used around the country to establish a walkable catchment.
- 6.4 The general theory of walkability, discussed in “*Walkable City*” by Jeff Speck, “*explains how, to be favored, a walk has to satisfy four<sup>8</sup> main*

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<sup>6</sup> NPS-UD, Objective 3(b), Policy 1, Policy 3(c).

<sup>7</sup> NPS-UD, Policy 3(c).

<sup>8</sup> NPS-UD.

*conditions: it must be useful, safe, comfortable, and interesting*<sup>9</sup>. It is not just about time or distance.

- 6.5 When considering a walkable catchment in the New Zealand context, there are places that display these four key attributes, but many that do not.
- 6.6 The potential opportunity for better urban environments to emerge over time can address these issues, and I consider that planning to achieve a walkable city takes priority over whether zoning should respond to only areas that are currently walkable. The District Plan is forward planning and should respond to the NPS-UD to provide for the future outcome.
- 6.7 Given the opportunity for significant change in the urban fabric of our cities as provided for by the NPS-UD, I consider there will be opportunities for public infrastructure enhancements along with the right building response to the street through private investment to support walkability. Improvements of these elements are likely to be needed to support the potential growth within both the HRZ and MRZ.
- 6.8 Walkability to stations is only part of the story, and I consider walkability to centres is more important to assist with the ability for residents to live and work, and shop or use other facilities within their local area, thereby reducing the need to travel.
- 6.9 The opportunity for commercial and social activities to occur in a centre should also be reviewed in parallel with the opportunity for increased residential outcomes within and surrounding the centre, and this should include the size of the centre.
- 6.10 When determining the size of the walkable catchment from a centre, the size and function of a centre needs confirmation in order to respond to the NPS-UD. In this regard, I have worked with Mr Cullen and Mr Heale along with other planners who are considering these matters on a wider regional basis through work on the other District Plans in the Wellington Region. I rely on Mr Cullen's evidence who supports introducing a Town Centre zone in the centre hierarchy,<sup>10</sup> supports growth of the centres.<sup>11</sup>

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<sup>9</sup> J. Speck, *Walkable City*, New York, North Point Press, 2012, page 11.

<sup>10</sup> EIC Mr Cullen, paragraph 1.4(c).

<sup>11</sup> EIC Mr Cullen para 5.2.

- 6.11 The walkable catchment for higher density is then determined from the edge of that proposed centre zone as required. I also agree with Mr Cullen's evidence that the performance of the centre is important, rather than just its classification, and that should include its future potential.<sup>12</sup> Linden is an example where the centre has limited offering with poor amenity, and in its current state does not support high density around it. However, a higher population through increased density, could support redevelopment of this centre, increasing the quality of the environment generally.
- 6.12 There are a number of methodologies being used to determine walkable catchments. However, regardless of the method, the outcome is considered a 'line in the sand' as a planning tool that determines the boundary of where different residential densities should be enabled via a zone. Using zones is a method that uses a spatial relationship and in this case a distance from another zone. While I understand the Council's desire to use time to define the catchments, it ultimately provides a distance. The matter of walking speed is the main issue that results in the catchment areas being different between the Council and the Kāinga Ora submission for the same walking time. I consider the catchment should support a larger area, consistent with Policy 3 of the NPS-UD.
- 6.13 The extent to which the catchment is 'walkable' will depend on existing and future development of both public and private space. Defining the catchment is not an exact science, and I consider it provides the opportunity for a walkable outcome to be achieved.
- 6.14 The reporting officer has provided an assessment of relevant submissions from paragraphs 207 to 388. This summary considers a range of factors including:
- (a) an amenity heat map;
  - (b) public and active transport;
  - (c) urban amenity, mobility, safety; and
  - (d) other factors that make a larger or smaller walkable catchment more appropriate.

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<sup>12</sup> EIC Mr Cullen para 6.3.

6.15 Whilst I agree that these matters are important, these should also be considered in the light of the future potential, not just the existing condition.

6.16 The reporting officer draws on Ministry for the Environment (**MfE**) guidance and states that:

“In this report, based on the guidance above, my starting point is a ten minute walkable catchment around all rapid transit stops, city centre and metropolitan centres. The walkable catchment may be reduced to five minutes where there are limited or no local shops and services nearby, public transport services are limited, transit-oriented development potential is limited by topography, reserves or other constraints, or pedestrian routes have poor connectivity or quality.

Conversely, the walkable catchment may be increased from 10 minutes where there are lots of local shops and services, frequent public transport options, transit-oriented development potential is high (high land value, many developable sections, etc), and the area has good pedestrian and micro-mobility services to allow safe, convenient and efficient access to the rapid transit stop or centre”.<sup>13</sup>

6.17 I generally support the reporting officer based on my experience and review of the MfE guidance and findings from research by Auckland Transport, however I consider that not all of the attributes listed above need to exist to determine an increased or decreased catchment, rather the opportunity should exist.

6.18 I consider the above section 42A methodology is too focused on the existing qualities of places which in the section 42A author’s opinion generally supports the reduction of a walkable catchment.

6.19 I support the expansion where the opportunity presents as this is in accordance with the minimum expectations set out in the NPS-UD. This provides a greater scope or opportunity for density to be realised in the best locations.

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<sup>13</sup> See paragraphs 269 ad 270 of the section 42A report.

## **7. CATCHMENT DEFINITION**

- 7.1 I support the proposed changes to the definition as recommended by Mr Heale.<sup>14</sup> We discussed the issue of time versus distance and agreed that the zone location will be based on this definition refined as necessary and therefore time is appropriate within the definition.

## **8. WALKING SPEEDS VERSUS DISTANCE**

- 8.1 A walkable catchment is generally considered to be the distance people will walk to different places in a particular time. People walk for different reasons and the speed at which they walk varies depending on the activity and the ability of the individual and the environment through which they walk. This creates the first issue with defining a catchment (being a physical distance) based on a 5 minute or 10 minute walk for example, which are typically used to define the extent of time a person is prepared to walk to a place depending on the services or facilities or transport options offered.
- 8.2 The total journey time is a key aspect of whether a person will take a train and how far they might walk to the station for example. The frequency and efficiency of the train is a key factor in this. This is evident in the research stated in the section 42A report,<sup>15</sup> outlining that more people will use the bus to Wellington Central from Johnsonville than the train because the bus is currently faster.
- 8.3 I have reviewed the evidence of Orla Hammond who sets out the method that her team used to provide Council with a range of average walking speeds. Ms Hammond determined a range of speeds people walk and defined them with an average for low speed at 0.93m/s, moderate speed at 1.1m/s and fast speed at 1.35m/s on flat ground.<sup>16</sup> The Council has then used these speeds within their walking network model to determine the catchment.<sup>17</sup>

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<sup>14</sup> EIC Mr Heale appendix 5.

<sup>15</sup> See para. 183 of the section 42A report.

<sup>16</sup> EIC Ms Hammond, paragraph 7.

<sup>17</sup> Wellington City Council, Spatial Plan for Wellington City, Generating walking catchments.

- 8.4 Ms Hammond acknowledges that walking speed is highly subjective, and through her work found that a speed of 5km/hr is too fast for low and moderate speed walkers.<sup>18</sup>
- 8.5 The above average speeds are slower than Waka Kotahi guidance which states that a fit health adult will generally travel about 5 to 6 km in an hour, and they suggest a simple rule of thumb for unimpeded walking is 10 minutes per km (or 1.66m/s).<sup>19</sup> In their on-line guidance for “Physical space and walking speed”,<sup>20</sup> Waka Kotahi state for transport modelling, walking catchments to be between 4.8-5.0km/h (ie 1.3m/s to 1.4m/s).
- 8.6 First-hand experience in the Wellington CBD confirmed this, acknowledging the sample data is very small. A colleague and myself identified two separate people walking north west towards the Wellington Central Railway Station<sup>21</sup> through the central Wellington area who were walking faster than others. We followed them and walked at their speed. Through the use of Samsung Health Application on our phone, it stated that our average speed was 5.8km/hr (1.61m/s) over a period of 11:29 minutes and a distance of 1.11km. This includes the need to cross streets, and navigate between other pedestrians.
- 8.7 The well-known rule of thumb to represent a 10min walk is 800m, which translates to a speed of 1.33m/s, or 4.7km/hr. This reduction in distance can be considered to take into account delays on the journey such as traffic lights and density of pedestrians, but also slower walking speeds.
- 8.8 I appreciate that the MfE guidance states that a walkable catchment is “*the area that an average person could walk from a specific point to get to multiple destinations*”,<sup>22</sup> however it doesn’t define what an average person is. I have assumed it means the average speed or distance, and the two could be different.

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<sup>18</sup> EIC Ms. Hammond, Para 5.

<sup>19</sup> Pedestrian planning and design guide, NZTA, 2009, Chapter 3 page 5.

<sup>20</sup> [https://www.nzta.govt.nz/walking-cycling-and-public-transport/walking/walking-standards-and-guidelines/pedestrian-network-guidance/planning/pedestrian-planning-principles/pedestrian-characteristics/physical-space/#\\_ftnref1](https://www.nzta.govt.nz/walking-cycling-and-public-transport/walking/walking-standards-and-guidelines/pedestrian-network-guidance/planning/pedestrian-planning-principles/pedestrian-characteristics/physical-space/#_ftnref1).

<sup>21</sup> There is no confirmation that those people walked to the railway station.

<sup>22</sup> Ministry for the Environment, 2020, *Understanding and Implementing Intensification Provisions for the National Policy Statement on Urban Development*, section 5.5.



- 8.9 I consider that there is opportunity for higher forms / density of development for people who are prepared to walk further than average and this should be encouraged.
- 8.10 Considering the variety of speeds people walk for different reasons and for the purposes of establishing a walkable catchment for defining zone boundaries, I consider that a speed of 1.33m/s (800m in 10min walk for example) should be used as it is a simple method. I recommend this in the interest of providing greater opportunities for a greater population to reside in a walkable distance from a train station or centre, and as set out below, there is evidence that people will walk greater distances to a train station. I note that Auckland Council has proposed an 800m distance for defining the walkable catchment around RTS.<sup>23</sup>
- 8.11 In addition to walking, micro-mobility options such as e-scooters, play a role now in how people move. These are generally quicker than walking and potential provide a wider catchment for people who may wish to use the train. These modes might also be used in areas where above average people may walk.

## **9. WALKABLE CATCHMENTS AROUND CENTRES**

- 9.1 The section 42A<sup>24</sup> recommends a 15 minute catchment from the City Centre zone, a 10 minute catchment from the Metropolitan Centre zone and no catchment around Town, Local or Neighbourhood Centre zones.
- 9.2 I agree that the NPS-UD does not specifically require walkable catchments to be identified around Town, Local or Neighbourhood Centres as it does for City and Metropolitan Centres. However, the reality of Policy3(d) of the NPS-UD is that consideration of form and density adjacent to these centres is required, and this should include the ability to walk to them.
- 9.3 I support the Kāinga Ora view that convenient walkable locations around all centres provide an opportunity for higher density residential outcomes.
- 9.4 The concept of using a walkable catchment around all centres is a good way of defining the distance from a centre where a different outcome

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<sup>23</sup> PC78 Information Sheet 1 Walkable Catchments.

<sup>24</sup> See para. 389 of the section 42A report.

would be suitable. The Kāinga Ora submission does not seek a walkable catchment around the Neighbourhood Centre zone as there is no desire to provide any increased density or height over the MDZ, and the neighbourhood centres should ideally be located such that they are all already walkable from their catchment where intensification is already enabled. There are some Neighbourhood centres caught by a wider catchment where density is sort to increase such as at Luxford Street in Berhampore, or Broadway in Miramar. In terms of the urban form, these neighbourhood centres should respond to the height opportunity of the residential zone around them.

9.5 The following table provides a helpful summary of the Kāinga Ora submissions on heights and catchment extent around centres.

	Centre Height	Catchment and Height
City Centre	Unlimited	0-400m - 43m (12 storeys) 400-800m – 36m (10 storeys) 800-1500m – HDRZ 22m (6 storeys)
Metro Centre	55m	0-400m – 36m (10 storeys) 400-800 HDRZ 22m (6 storeys)
Town Centre	36m	0-400m – 36m Newtown 29m Miramar and Tawa 400-800 HDRZ 22m or 11-18 MDRZ
Local Centre	22m	0-400m – 18m 11-18 MDRZ

Neighbourhood Centre	Height control 1 – 12m  Height control 2 – 22m	11-18 MDRZ
Rapid Transit Stops		0-800m – 22m (6 storeys)

Note that the submission maps show Aro Valley as Local Centre but with a 36m height. This is because it is within the walkable catchment of the city centre zone.

- 9.6 The strategy proposed is to provide the greatest heights within centres which respond to the function of each, with lower heights surrounding these. This is to provide the greatest opportunity for density within the centre and a good opportunity for residential close to the centre where residents can benefit from the proximity, but enjoy a more residential context. This strategy also provides a transition in height as one transitions through the zones.
- 9.7 The topography of Wellington City is generally more challenging than many other New Zealand urban environments, and I consider that where possible the maximum residential opportunity should be enabled at centres which are generally on the flatter land. It is more important that people have access to the facilities within centres to support the concept of live work and play in place, rather than the ability to walk to a RTS. The two provide quite different functions, but complementary, and it is expected that people will continue to travel for work or to access other services that are not in the immediate centre making the travel options important.
- 9.8 In terms of the City Centre, I consider this to be the most walkable area of Wellington. It is a great example of a compact well-functioning urban environment, except I consider it should have more people residing within it to contribute to vibrancy at night.
- 9.9 The ability for more people to live within and around the City Centre will potentially contribute to the vibrancy, safety and function of the city.

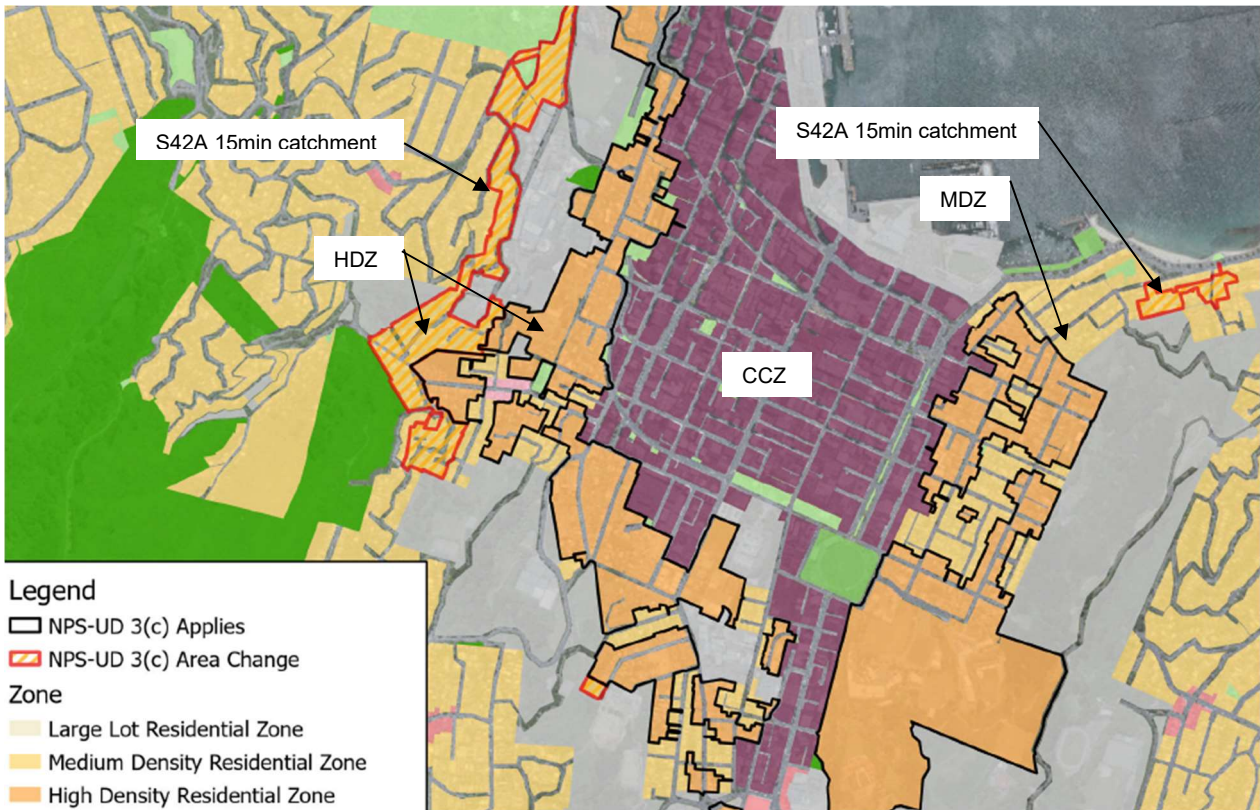
- 9.10 With reference to Mr Heale's evidence (Appendix 2), he includes examples of 'Walking journey to work data' for Wellington which states that people are currently walking at least 1500m to the City Centre and 800m to Town centres. These are reasonably large mesh blocks which do not provide the exact distances these people walk, however this confirms people currently walk at least these distances in Wellington, noting these might not be considered the average person.
- 9.11 The Kāinga Ora submission<sup>25</sup> seeks a walkable catchment of 1500m from the edge of the City Centre zone consistent with their policy direction for city centres in New Zealand. This is to enable higher density opportunities than the MDZ within a reasonable walking catchment. I generally support this approach, however as discussed below, this starting point is too great in the Wellington central area. 1500m equates to approximately 19 - 20 minutes.
- 9.12 The Kāinga Ora submission<sup>26</sup> for HDZ adjacent to Wellington City Centre includes three gradations of height within the catchment to enable more density close to the centre, then transitioning out to the lower.<sup>27</sup> Regardless of the outcome of the height issue, the catchment proposed would be required to provide at least 6 storey buildings due to Policy 3(c) of the NPS-UD.
- 9.13 The section 42A report recommends a 15 minute catchment, which at the same speed would be approximately 1200m. However, the section 42A report includes a spatial area which is less than 1200m due to the slower speeds used. This revised section 42A position is an increase from the notified plan of 10 minutes. An example of the section 42A 15 minute catchment is illustrated in **Figure 1** (expanded to include the red areas).

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<sup>25</sup> Submission No. 391.16.

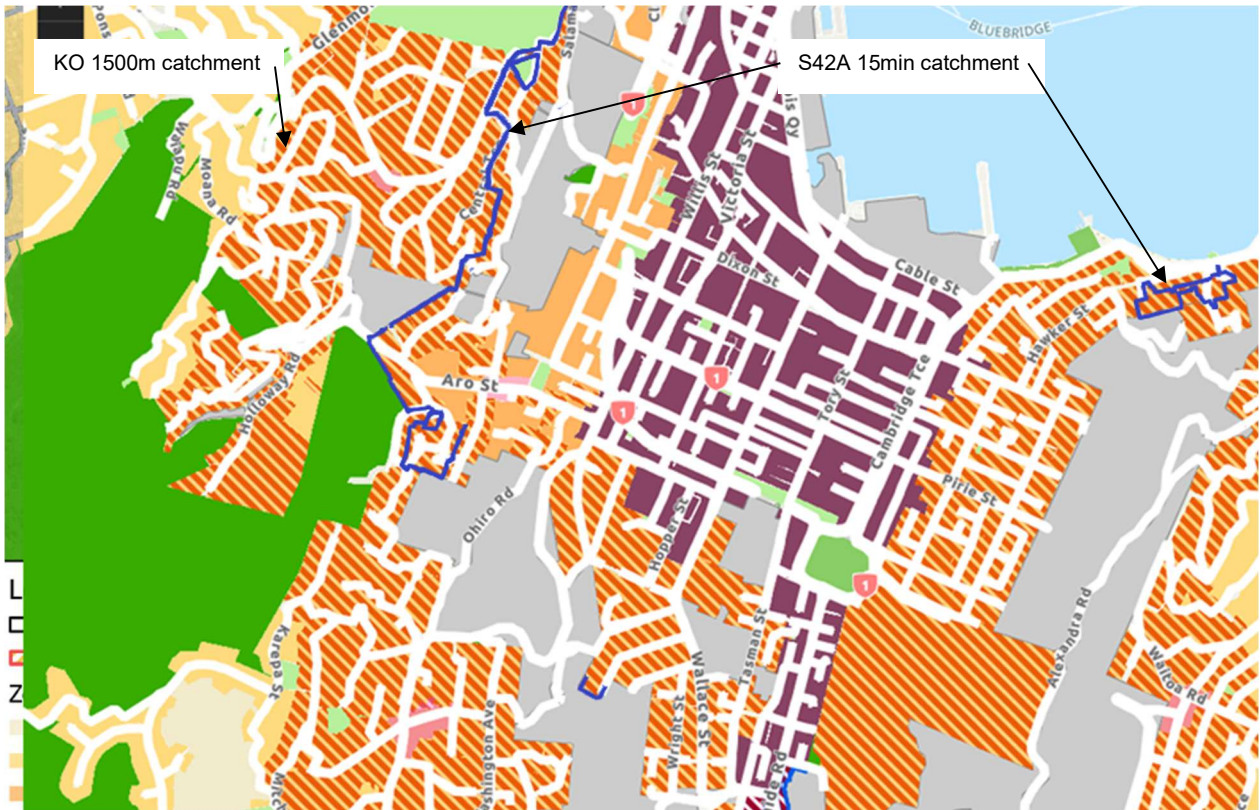
<sup>26</sup> Submission No. 391.42.

<sup>27</sup> This is illustrated on Maps 12 to 18 attached to the Kāinga Ora submission.



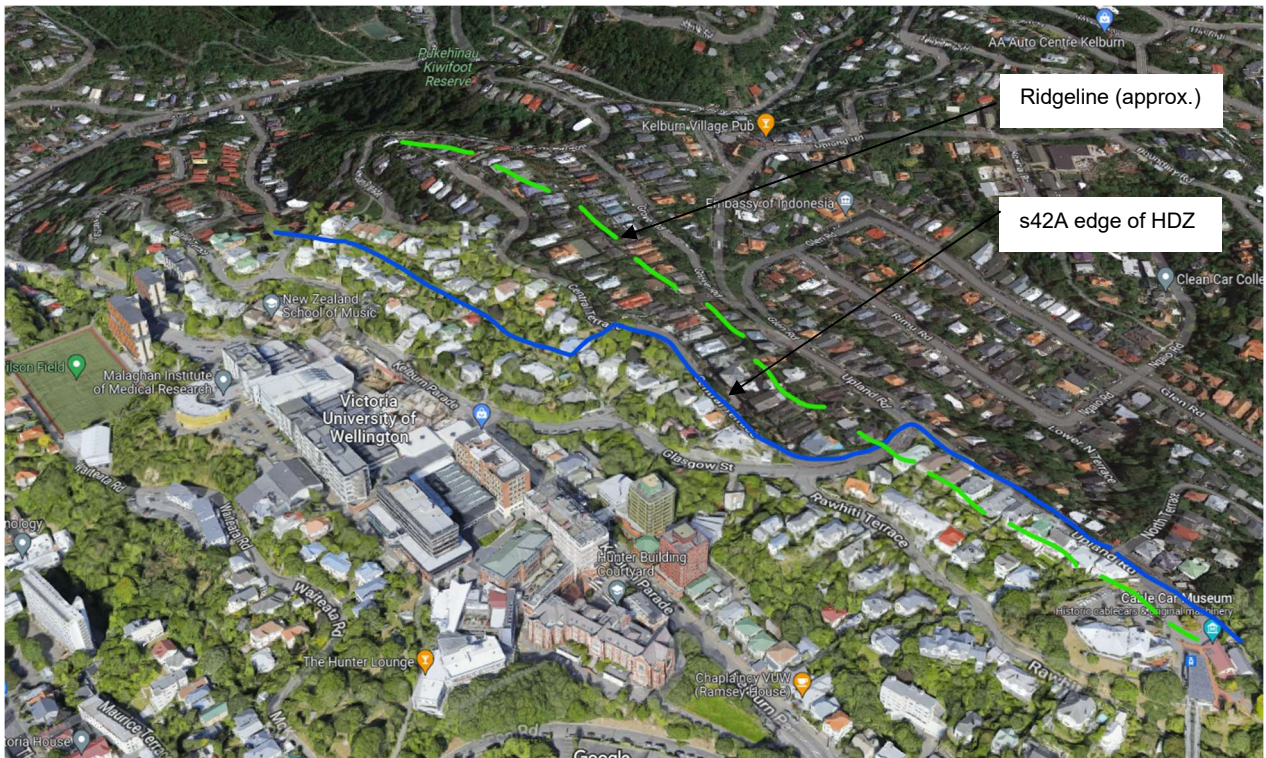
**Figure 1** – Section 42A recommended 15min catchment from City Centre zone (not to a scale, north up the page).

9.14 The Kāinga Ora submission proposes a wider catchment which is illustrated in **Figure 2**, where the difference in land area can be appreciated.



**Figure 2** – Kāinga Ora submission map with section 42A 15min catchment extent marked with a Blue line (not to a scale, north up the page).

9.15 In the context of Wellington City, I consider that the baseline should be a 1,200m catchment which is similar to the section 42A report, but generally larger in actual area due to the difference between distance and speed methodologies. The reason for this is that the areas within 1200m are walkable to the City Centre, and have many other amenities to support higher densities, such as Victoria University, open space and streets that currently support walkability. It is limited by the steeper topography and existing green belts which separate communities. Regardless of the distance, the application of the HDZ should respond consistently to landform. For example, the section 42A recommends a boundary which runs along part of a ridge at Upland Road, but then runs mid-block through an easterly orientated slope, even though continuation of the ridge is at the top of this slope. This is illustrated below in **Figure 3**. 1,200m would include more of the ridge area.



**Figure 3** – A 3D view of Google Earth from over the City Centre looking south west with the University in the foreground and the approximate location of the section 42A report extent of the HDZ relative to the existing ridgeline (not to a scale, north to the right of image)

- 9.16 This ridge provides views over the city and harbour which are attractive from an amenity perspective. Whilst not included within a separate catchment, the University is a facility that warrants higher density residential around it and that has occurred. This facility could justify a larger catchment.
- 9.17 From the starting point of 1200m, I consider the question then needs to be asked whether the catchment should be reduced or enlarged? The example above suggests to me that if it is considered appropriate to provide the HDZ along part of Upland Road (as per the section 42A recommendation), why would it not be appropriate to extend the HDZ along the ridge to at least the southern part of Upland Road and Grove Road? It might be a little more than 1200m, but would make sense from a landform perspective, and supported by the amenities nearby such as the university and the Upland Road Local Centre.
- 9.18 There are potentially locations where a 1500m catchment for HDZ would be suitable, and the opportunity provided may enable redevelopment to occur. Kelburn is one area where the MDZ is proposed in the notified plan which provides for an increase in density. If taken up, such

development would change the character of Kelburn. As this change is considered appropriate, I pose the questions: is higher density, or taller buildings also appropriate in this location?

- 9.19 I consider that the attributes of the Kelburn location support higher density. However, the extent of the zone may not extend as far as the Kāinga Ora submission, and could be refined based on landform and connectivity. This analysis is ongoing and exact recommendations to maps will be provided in other hearing streams. The key aspect from a strategic perspective, is that there is the ability to zone land HDZ in addition to the baseline catchment, particularly where the amenity values and facilities support it.
- 9.20 Areas that are less appropriate for further intensifications are locations when the main access routes are through large areas of open space that provide a distinctive separation from the city fabric. These areas have the potential for being less safe, particularly at night, and don't provide the urban environment expected along the route. This is not to say people will not walk these routes, but they are less attractive than other locations.
- 9.21 I have come to the conclusion that steep sites are not necessarily an issue for development of high density outcomes, but steep streets with poor pedestrian connectivity are. Considerations around the potential to enhance these need to be considered and if limited potential the area could be reduced.
- 9.22 The Local Centres and Town Centres are expected to provide a higher level of service than Neighbourhood centres and can support additional density within 400m and 800m respectively. There are many areas where the catchments from the different centres overlap and, in these circumstances, the higher density opportunity should apply, particularly supported by the additional smaller centre. I consider this is an appropriate way to maximise residential potential in areas that are generally flat where the feasibility for apartments is potentially better than on steeper slopes.



## 10. WALKABLE CATCHMENTS AROUND RAPID TRANSIT STOPS

- 10.1 The section 42A report recommends<sup>28</sup> the application of 5 minute and 10 minute walkable catchments around RTS, but does not state what the corresponding distances are for each.
- 10.2 If I understand the section 42A analysis correctly, the above recommendations are based on whether other amenities exist.<sup>29</sup> The application of the 5 minute and 10 minute catchment does not include the potential for these attributes to be improved in the future which might occur if development is enabled. The analysis does not appear to take into consideration how beneficial the station is to users. The analysis does not suggest any negative impacts of increasing the 5 minute catchment to 10 minutes however.
- 10.3 It is generally accepted that people are prepared to walk at least 800m to a train station with a frequent service.<sup>30</sup> The MfE has recommended that an 800m distance to a transit stop entrance should be regarded as a minimum, but acknowledging that each local authority shall determine catchments appropriate for local circumstances.<sup>31</sup>
- 10.4 There is also a general understanding that people will walk further to a train station than a bus stop with the expectation a train is more likely to take them further, more quickly than a bus.<sup>32</sup> Bus stops are usually spaced with a smaller expected walking catchment, and usually within a 5 minute walking catchment. Waka Kotahi guidance suggests this is usually between 250-800m.<sup>33</sup> The following table sets out the spacing for different areas and modes contained within this guidance:

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<sup>28</sup> See para. 389 of the section 42A report.

<sup>29</sup> See section 269 of the section 42A report.

<sup>30</sup> This is supported by the Walkable Catchments Analysis at Auckland Train and Northern Busway Stations – 2013 – Executive Summary.

<sup>31</sup> Ministry for the Environment, 2020, *Understanding and Implementing Intensification Provisions for the National Policy Statement on Urban Development*, section 5.5.3

<sup>32</sup> Noting the research in the s42A report that states a bus to Wellington from Johnsonville is quicker. This excludes buses used on RTS such as the Northern Busway in Auckland.

<sup>33</sup> <https://www.nzta.govt.nz/walking-cycling-and-public-transport/public-transport/public-transport-design-guidance/bus-stop/bus-stop-location-planning/location-fundamentals/bus-stop-spacing/>

Table: Bus stop spacing guidance

Location of bus stop	Recommended spacing between stops	Comment
Urban area (general)	400m	Most people in the bus service catchment area have about a 5-minute walk to or from the nearest bus stop.
Very densely populated area	250–400m	Higher density residential areas have higher demand for bus stops. Spacing may be less than 400m but should be no less than 250m.
Rapid transit route	800m	Spacing is usually about 800m, because in areas with higher quality bus services people are more likely to be willing to walk a bit further for a better level of service.
Lower density area	800m or more	In lower density areas such as rural areas, spacing can be increased up to 800m or more due to low passenger volumes and long distances between properties.

10.5 The MfE summarised research in 2018 by Auckland Transport as follows:<sup>34</sup>

“Research in Auckland of pedestrians’ trips to train stations (rapid transit stops) showed half of the people surveyed walked further than 800 metres to a train station. Using this information, Auckland Transport suggested a range of sizes for desirable walkable catchments for town and neighbourhood centres and amenities. These ranged from 400 metres (a five- to 10-minute walk), and 1000 metres or a 20-minute walk for town centres and rapid transit stops, to 1200 metres for intermediate or high schools (Auckland Transport, 2018).”

10.6 Based on the guidance and research, I agree with the reporting planner that the starting point for a walkable catchment around an RTS should be a 10 minute walk, however to actually define this area, I consider using an 800m distance is a simple method, particularly taking into account the greater areas of steeper path networks in Wellington. This aligns with RTS for buses as recommended by Waka Kotahi. The catchment can be expanded or reduced as necessary where areas are unsuitable for a range of reasons. This defines the ‘line in the sand’ for

<sup>34</sup> Ministry for the Environment, 2020, *Understanding and Implementing Intensification Provisions for the National Policy Statement on Urban Development*, section 5.5.2.

the purpose of identifying where increased density should be enabled as required by the NPS-UD.

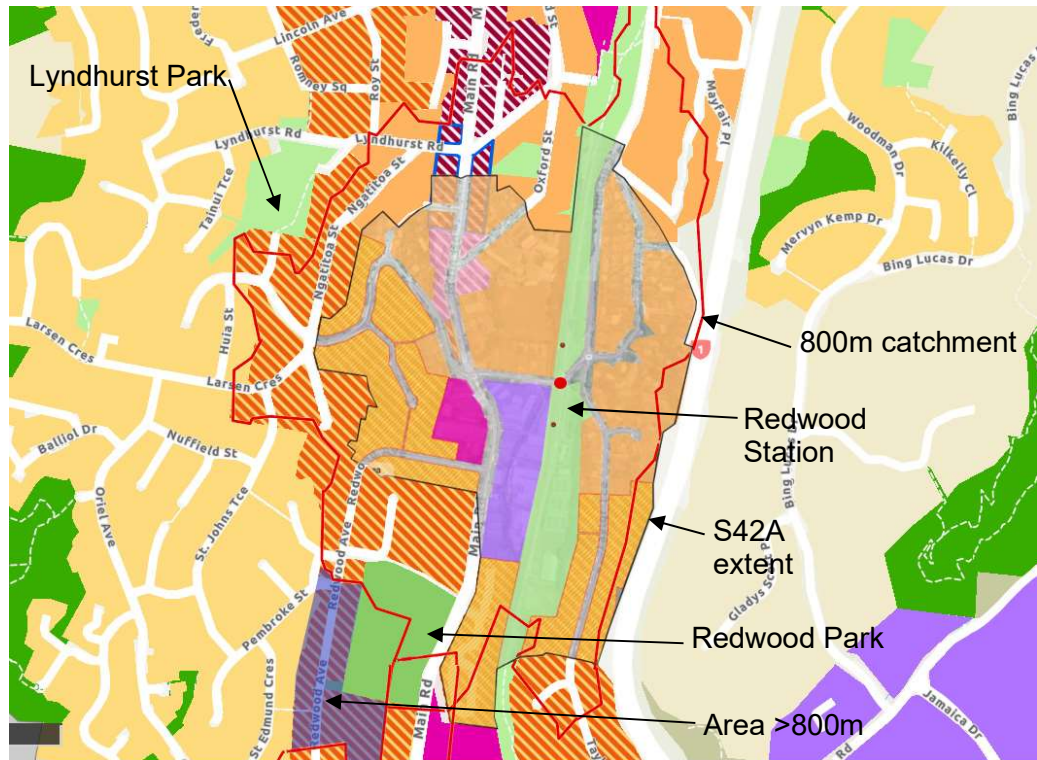
- 10.7 Working with The Property Group using GIS software, an 800m distance was applied from the stations, and the area within identified for high density residential zone or 6 storeys. The maps included in the Kāinga Ora submission illustrate this outcome, noting there is overlap with the catchments of the centres.
- 10.8 I have visited all of these locations with The Property Group and revisited many of them with Mr Cullen. I have not visited every individual location where the interface with another zone occurs, but I have identified areas where they could be of concern and looked in detail using a mix of the Council proposed district plan maps, and Google Street View to ground truth these catchment areas.
- 10.9 This has led to some refinement of the catchment particularly where the existing street network is very narrow with no existing separated pedestrian facilities, and where it would be very difficult to establish these to support higher density, acknowledging that the MDZ would continue to apply and provide for enhanced density, which should also be provided with access options. These areas are typically on the outskirts of the catchment on steep land up the side of the valleys. Consideration of the boundary of the HDZ has also taken into account the existing landform to avoid taller buildings on a landform that could appear isolated and not that responsive to the wider landform. This is despite the fact that the urban form could include a range of outcomes including only a few taller buildings as anticipated in the zone within a relatively low-rise form.
- 10.10 There are other areas that are further than 800m from a station and provide good opportunities for the catchment to be larger. These include areas that are an easier walk than some areas within the distance, or are associated with a centre or other facilities. Like with the review to reduce areas, these locations are identified as being appropriate as they assist with providing the opportunity for increasing housing opportunities in areas that are also in close proximity to, and walkable to, centres.
- 10.11 In many locations, the RTS are co-located with centres so the walkability story is multi-faceted.

- 10.12 This refinement work is ongoing and it is proposed to submit adjusted maps with evidence in the residential hearing stream.
- 10.13 I have not found in the section 42A report particular issues that might suggest that the local context should reduce or expand the catchment, except for the difference between a 5 minute and 10 minute catchment due to lack of existing amenities or connections.
- 10.14 Regardless of which time catchment is applied, there are locations where the ability to intensify is heavily constrained, particularly due to the physical nature of the street network where they are very narrow and do not have footpaths and there is no easy solution to providing them, or where the streets are very steep and provide a significant challenge to pedestrians on a daily basis.
- 10.15 The existing landscape, particularly the landform and open space areas also constrain intensification areas and provide logical boundaries to intensification. For example, while a part of the landscape might be within a walkable distance, the outer extents of might be on a more separated landform from the rest of the catchment and therefore not particularly connected to it. It might also look out of place as a small pocket in a wider lower density area without logical rationale. The Kelburn area is an example of this, where the south eastern areas are physically separated from the main Kelburn area. I intend on including visual material at the hearing or other hearing streams to illustrate this.
- 10.16 I find the section 42A analysis interesting, particularly the rationale for applying a 5 minute and 10 minute catchment to the various stations. It states that: *“More public transport users between Johnsonville and Wellington Station choose the bus over the train”* and the service *“is “quick” for people travelling between Wellington Station and Crofton Downs, Ngaio, Awarua Street, Simla Crescent and Box Hill stations”*.<sup>35</sup>
- 10.17 This does not support a larger catchment around the Johnsonville station for example, unless the train service becomes more attractive to users than using the bus or other modes, which could definitely be the case if the increased population creates a lower level of service on the bus network for example, or the frequency of the train is increased.

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<sup>35</sup> s42A Report, para 183.

- 10.18 On the other hand, the analysis perhaps suggests that more people living around the stations closer to Wellington would benefit more from the train service and therefore the catchment perhaps should be larger at these locations.
- 10.19 The larger catchment around Johnsonville would be supported by enhancements to this centre through the metropolitan zone opportunities and the desire to provide for an even greater population where the expectation for a significant range of amenities are to be provided. In this case, the train station is perhaps not so important to the catchment considerations.
- 10.20 I consider that a 5 minute catchment will direct higher density redevelopment to locations that are closer to the station and therefore provide for a greater range of people, particularly those who may only chose to use the train if it is within a short walk. This is a positive outcome as higher density should be encouraged close to the station.
- 10.21 This 5 minute catchment may also reduce the risk of sporadic development of 6 storey buildings in areas further from the station which could be considered out of place as they might be developed before others closer to the station. This risk exists for areas that have a 10 minute catchment, and I have not identified any reason why this should be enabled in one location and not another.
- 10.22 The section 42A report includes maps recommending where the high density zone should apply around stations within both the 5 minute and 10 minute catchments.
- 10.23 To understand the difference in land area (noting that some refinement is being undertaken), the following maps have been created from a screen capture of the Kāinga Ora Submission map, and the appropriate map in the section 42A report, scaled by eye to fit. An 800m catchment line obtained from The Property Group was added and scaled by eye. It is not 100% accurate, but to an accuracy that enables the differences to be understood.

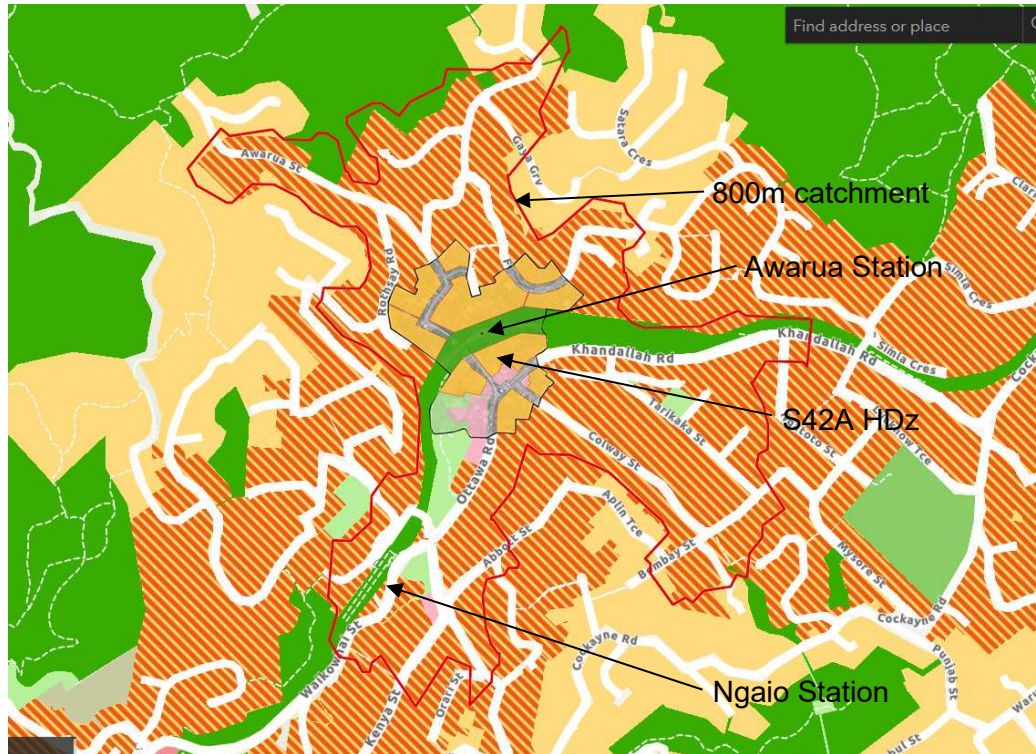


**Figure 4** (no scale) – High Density zone around Redwood Station (Tawa) (not to a scale, north up the page)

10.24 **Figure 4** illustrates the section 42A recommended area contained within the black line (noting this has expanded to include some of the Kāinga Ora submission area), the HDZ as submitted by Kāinga Ora is marked with an orange hatch, the 800m walking catchment from the station (red dot mid-point between two platforms) is represented by a red line. The catchments from other stations overlap, and part of the Takapu Station catchment to the south is illustrated at the bottom of the image. The blue overlay is an area between each station that is more than 800m from either.

10.25 **Figure 4** illustrates that the Kāinga Ora Submission area for HDZ is a little larger than the section 42A recommendation even though it is considered a 10 minute catchment rather than the section 42A 5 minute catchment and is constrained by the motorway to the east. It extends to Lyndhurst Park on a landform that is of similar elevation to that proposed for HDZ on the eastern side of the railway, and to Redwood Park including St Francis Xavier School. The blue area is only a short part of the street where the HDZ would not apply if strictly conforming to the 800m catchments. This could result in a strange outcome along the

street in urban form terms, and is also in an area which abuts Redwood Park which would support higher density around it.



**Figure 5** (no scale) – High Density zone around Awarua Station (Ngaio) – as above, the section 42A report recommendation is contained by the black line, Kainga Ora submission is the orange hatched area and the red line is 800m from the station (not to a scale, north up the page).

10.26 The Kāinga Ora proposed HDZ has a bigger proportion of additional area than the section 42A recommended area as illustrated in **Figure 5** compared with **Figure 4**. This may be due to the impact of slope in the Council’s walking model. The areas proposed by Kāinga Ora outside the 800m line (red) is likely to be included in catchments from other stations such as Ngaio.

10.27 The section 42A report catchment does not appear to have a principled approach in response to landscape such that the area for HDZ is proposed on lower slopes and knolls. It also includes areas that are perhaps less accessible to the station due to the need to use a walkway through the bush, rather than using the street network.

10.28 I have attempted to illustrate this in Figure 6 below. This highlights that HDZ is proposed on a high point that is defined due to the pedestrian connection through bush. I consider this area can be HDZ, but the street

network is a better all-inclusive location for higher density such as further along Awarua Street or to the bottom right of the image.



**Figure 6** – A Google Earth 3D at Awarua Station, with Ngaio centre in the foreground and view orientated north, marked up by hand where the orange line is roughly the boundary between the HDZ and the MDZ, the light blue line is the street network, and the green dashed lines are pedestrian connections (not to a scale, north up the page)

10.29 I consider that a 10 minute catchment (800m) at an RTS, rather than 5 minutes, is more consistent with the NPS-UD with the expectation that the elements to support walkability can be provided, particularly where there is a benefit for people residing adjacent to stations that are closer to Wellington that provide a good transit option and where existing and future commercial and social activities will provide for future residents. The actual location of the HDZ boundary maybe larger or smaller depending on landscape, accessibility, desirable urban form, relationship to other amenities such as open space.

## 11. ZONES ADJACENT TO CENTRES AND RTS

11.1 From a policy perspective, providing higher density around stations and centres is supported. The HDZ is more suited than the MDZ in providing for this outcome as it anticipates a higher density than the MDZ as notified. The desired form of development might be different across locations if necessary within the same zone, and also within a catchment, and can be managed by different provisions.



11.2 The requirement to enable 6 storey buildings within the walkable catchment of a RTS could be provided in a variety of forms particularly through various standards. For example, the Kāinga Ora submission on the Height in Relation to Boundary (“HIRB”) standards in the HDZ seeks to change this control from 8m+60° to 19m+60°. This is to enable and encourage buildings to address the street and enable more sites to achieve higher buildings to meet the objectives of the zone as the 8m+60° is the main restriction on achieving 6 storeys high, particularly with narrow sites. The resultant provisions for the HDZ (to be discussed at the residential hearings) could achieve a more urban outcome (as proposed by Kāinga Ora), which could be more appropriate in the larger more urban centres. The notified HIRB standard could result in a less urban form and while enabling taller development on larger sites, could perhaps better control building bulk relative to existing or proposed lower-level developments in places where a less intense built form may be desired for a particular reason.

11.3 I consider that a high-density zone should be applied to the walkable catchments from RTS, town centres and higher order centres. The provisions that control development in the high-density zone can then be considered.

## **12. CHARACTER AREAS**

12.1 The Kāinga Ora submission seeks deletion of Objective UFD-O8 (new development responsive to special character context).<sup>36</sup>

12.2 The reporting officer does not agree with these changes on the basis that Objective UFD-O8 provides high level direction for character precincts.

12.3 I rely on Mr Heale’s evidence as to how this issue is managed from a planning perspective where there a number of methods available. However, from an urban design perspective, I consider that the identified existing qualities of areas containing historic housing and commercial buildings have merit in the contribution to the interest and identity of the city, and these add to the range of housing typologies while enabling one to appreciate the historical past. I question whether the character should

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<sup>36</sup> Submission 391.91.

be “protected and maintained” as discussed in the Section 32 analysis<sup>37</sup> as the outcome will be influenced the context regardless of zoning.

- 12.4 I agree with the reporting planner to the extent the objective can enable the methods in the plan to ensure an appropriate outcome. The concern when the submissions were drafted was the relationship between this objective and a qualifying matter which proposed MDZ to the identified character areas such as in Mt Victoria, rather than the HDZ which should apply where these areas are within a walkable catchment to the City Centre or Town Centre particularly. A precinct or overlay could apply over either zone to manage development.
- 12.5 I found that some of the existing buildings in these identified areas already contain more than three dwellings, so the issue is not necessarily one of density, but more importantly built form.
- 12.6 The application of the MDZ to the character areas could be considered spot zoning and has an inconsistent pattern. The relationship of these character areas with potential development in the surrounding HDZ should be a consideration. The built form at the interface of the character areas is likely to influence the character areas in addition to development within the character areas.
- 12.7 I also found that there are buildings that are not identified, but are as good, if not better than some of those identified in terms of the contribution they provide to the character of the area, noting I am not providing evidence on the historical merits of such buildings
- 12.8 Other hearing streams will discuss the management techniques for these areas, but I consider the strategic direction should enable areas of special character to be recognised, and the key character aspects identified with provisions for new development to occur in and around identified character areas an appropriate way.
- 12.9 I have discussed this with Mr Heale and recommended that the objective should enable development in character areas, but responsive to the character aspects of the context.
- 12.10 This would enable clear guidance to be included in any precinct or overlay as to the outcome anticipated for the area. This could include

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<sup>37</sup> Section 32 report Part 2, Character Precincts and the Mt Victoria North Townscape Precinct, page 5.

key design considerations for when new development is proposed next to an existing character building regardless of the zoning.

**13. PROPOSED WORDING CHANGES SOUGHT**

- 13.1 I rely on the evidence of Mr Heale for any recommended changes to the words used within the Plan as set out in his Appendix 5.
- 13.2 I have reviewed these and to the extent they are urban design related, I support the changes as they reflect my findings and advice.

**Nicholas J Rae**

7 February 2023