Ministry for the Environment
Manatū Mō Te Taiao

MINISTRY OF HOUSING AND URBAN DEVELOPMENT

Understanding and implementing intensification provisions for the National Policy Statement on Urban Development

New Zealand Government

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1 Introduction

1.1 Purpose

This guidance has been developed to help local authorities understand and interpret the provisions for intensification and in the National Policy Statement on Urban Development 2020 (NPS-UD). The specific provisions of the NPS-UD are Objective 3, Policies 3 to 5 and clauses 3.31 to 3.34 of subpart 6. The guidance provides methods, tools and examples to help implement these provisions effectively.

Local authorities can use this guidance to prepare principles for zoning to help inform and support the required plan changes. This guidance can also be used to understand the individual components of the intensification provisions (eg, accessibility, walkability, demand) to determine the intensification outcomes on the ground. This document is not intended to be a step-by-step guide to preparing plan changes to give effect to the NPS-UD intensification provisions. Plan changes and outcomes depend on the local context and local authorities will need to give effect to the intensification provisions in their local context.

Note the examples used in this guide are relatively basic examples which are intended to provide an indication of how the application of the provisions may work.

1.2 Scope

All local authorities that contain all or part of an urban environment are required to implement the relevant intensification provisions. The NPS-UD defines urban environment as an area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

(a) is, or is intended to be, predominantly urban in character; and

(b) is or is intended to be, part of a housing and labour market of at least 10,000 people.

The NPS-UD groups urban environments into three tiers.[1] Each tier has different policy requirements and implementation timeframes. The requirements for tier 1 urban environments are more directive than the requirements for tier 2 and 3 urban environments.

This guidance includes:

- a description of the intent of the NPS-UD intensification provisions, including an explanation of the expected outcomes of the intensification provisions
- methods, tools and examples to help tier 1, 2 and 3 local authorities implement the provisions.

Tier 1 local authorities are required to ensure that in metropolitan centre zones, building heights and density of the urban form reflects demand for housing and business space. This guidance provides

[1] Refer to the interpretation section (Part 1, clause 1.4) of the NPS-UD, specifically for the definitions of “urban environment”, “tier 1 urban environment”, “tier 2 urban environment” and “tier 3 urban environment”. Also, refer to appendix 1 of the NPS-UD for classification of tier 1 and tier 2 urban environments. Tier 3 urban environments include all of those not listed in the appendix.

detail on how local authorities could reconcile demand with a possible urban form, but it does not provide detail on calculating demand. Guidance on calculating demand for both residential and business space is covered in the guidance on housing and business development capacity assessments. This will be made available on the Ministry for the Environment's **website**.

Local authorities will need to consider the intensification provisions for any private plan changes they receive or plan changes they initiate. Guidance on the responsive planning requirements of the NPS-UD can be found on the Ministry for the Environment's **website**. In addition to meeting the intensification requirements, local authorities will also need to ensure development outcomes described for zones in your district plans are consistent with the intensification provisions (clauses 3.36 and 3.37). The intent of monitoring the consistency of the development outcomes with the intensification outcomes required is to ensure district plans – specifically the plan provisions (eg, objectives, policies, rules and assessment criteria cumulatively) – do not unnecessarily undermine development outcomes.

This intensification guide should not be read in isolation. Applying the intensification requirements should also take into account the other objectives, policies and requirements of the NPS-UD. In particular, intensification outcomes need to contribute to well-functioning urban environments (as described in Policy 1), noting that intensification done well can make a major contribution to this.

1.3 Structure of the guide

This guide describes each of the components local authorities will need to consider when implementing the intensification provisions. It provides information on how to measure or determine accessibility, walkability and appropriate heights and densities. The guidance also provides examples of how to consider these matters together to apply the intensification provisions effectively in district plans and regional policy statements.

Also included in this guide is an explanation and examples for applying the qualifying matters, when it has been determined through evidence that exceptions to the intensification provisions are required.

The guide is divided into a number of sub-sections, each addressing a policy area or a component of analysis that forms a part of implementation. This is followed by a worked example of how local authorities should consider these aspects together to work out how best to use them in determining heights and densities and an appropriate zoning pattern. A high-level summary of the structure is described below.

The first sub-sections suggest methods to produce analysis or evidence, including:

- clarification of definitions relating to the city centre and metropolitan centre zones
- understanding how to measure demand in metropolitan centres
- methods and tools that can be used to measure accessibility, including understanding definitions of planned and existing public and active transport
- how to determine walkable catchments for metropolitan centre zones and for planned and existing rapid transit stops.

The later sub-sections outline how the evidence can be combined and used to determine locations suitable for intensification and what level of this might be appropriate, including:

- enabling development capacity in city centres

- determining heights and densities in metropolitan centres and in walkable catchments
- enabling heights and densities commensurate to the level of accessibility and relative demand
- applying qualifying matters, including understanding how 'other' matters may apply.

The last section of the guide provides a full worked example of how to collectively consider the above matters to apply the intensification provisions effectively in district plans and regional policy statements.

1.4 Timing of implementation

To better enable intensification in our urban environments, many local authorities will be required to implement new policies under the NPS-UD and make changes to their planning documents. The intensification requirements and timeframes for tier 1, 2 and 3 local authorities are summarised in table 1 below.

Table 1: Intensification requirements and timeframes for tier 1, 2 and 3 local authorities

<table>
<tr><th></th><th colspan="2">Tier 1</th><th>Tier 2</th><th>Tier 3</th></tr>
<tr><td>Implementation timeframes</td><td colspan="2">Plan changes to give effect to intensification provisions notified as soon as practicable and no later than two years after commencement of the NPS-UD</td><td></td><td>Plan changes to give effect to intensification provisions notified <u>as soon as practicable</u> after commencement of the NPS-UD</td></tr>
<tr><td rowspan="5">Implementation requirements</td><td colspan="4">Provide for and enable the benefits of urban intensification through regional policy statements and district plans (ie, insert objective/s supporting intensification outcomes, new zone policies, changes to rules and rezoning)</td></tr>
<tr><td>City Centre Zone – enable building heights and density to realise as much development capacity as possible</td><td colspan="3" rowspan="4">Enable building heights and density commensurate to the level of accessibility or relative demand</td></tr>
<tr><td>Metropolitan Centre Zone – enable building heights of at least six storeys</td></tr>
<tr><td>Walkable catchments – enable building heights of six storeys within walkable catchments of rapid transit stops, city centre zones and metropolitan centre zones</td></tr>
<tr><td>All other locations – enable building heights and density commensurate to the level of accessibility and relative demand</td></tr>
</table>

1.5 What happens before the intensification plan changes are notified

Local authorities might receive resource consents or private plan changes which seek greater heights and densities (on the basis of the NPS-UD direction) before intensification plan changes directed in the NPS-UD are notified or take effect. In these instances, local authorities and other decision-makers considering resource consents must, under **section 104(1)(b)** of the Resource Management Act (RMA), have regard to "any relevant provisions" in a national policy statement (NPS). This is even before territorial authorities have amended their district plans to give effect to the intensification requirements. Except where otherwise specified in an NPS, this applies from the date of commencement of the NPS. Note that "any relevant provisions" includes any part of the NPS-UD. This means the preliminary provisions in Part 1, the objectives and policies in Part 2 and the implementation provisions in Part 3. All are "provisions" of the NPS, which may or may not be relevant to a particular resource consent.

Local authorities will need to amend their plans to give effect to the intensification provisions in the NPS-UD (Objective 3, Policies 3 to 5 and subpart 6 of Part 3). Before these plan changes take effect, the intensification provisions will need to be relevant to any resource consent application being considered for a development in areas covered by those provisions.

Private plan change requests lodged before a council-initiated plan change to implement the NPS-UD must give effect to the NPS-UD. This is a stronger direction than the requirement to "have regard to" an NPS in RMA section 104 for resource consents. On this basis, local authorities will need to consider whether the request gives effect to the intensification provisions when making decisions.

2 Intent and rationale of intensification policies

The intensification provisions are intended to ensure that in urban areas, intensification in desirable and suitable locations is enabled in plans. This is to support well-functioning urban environments and improve housing affordability through competitive land markets.

Some of the outcomes that are expected to be realised through the implementation of the intensification provisions are shown in figure 1 below.

Figure 1: Expected outcomes of the intensification provisions

Enabling higher-density development in locations with good access and amenity means people can live close to where they work, learn, shop or connect with friends and family. Such options let residents avoid congestion and long commute times. Businesses can also access more potential workers, customers and other businesses.

The intensification provisions are particularly important where they apply in areas close to current or planned rapid transit and frequent public transport services, as well as places where people can access many opportunities within walking distance. The provisions recognise the benefits of integrating transport and land-use policy. They allow for transport investment that can induce land-use change by encouraging greater supply of development capacity, thereby lifting the number of people living in high-amenity areas. This can help improve the economic case for public and active transport investments, for example by increasing the likely number of people using public transport services. Intensification is also important to support the reduction of greenhouse gas emissions and therefore has a role in climate change mitigation.

3 Key changes from National Policy Statement on Urban Development Capacity

The intensification provisions were not in the National Policy Statement on Urban Development Capacity (NPS-UDC 2016) and are new to the NPS-UD.

Local authorities often struggle to provide sufficient opportunities for higher-density development for a range of reasons, such as opposition from existing land owners, bias towards the status quo and concerns regarding amenity.

Lack of access to well-integrated, higher-density housing has played a role in the current constrained supply of housing. In addition, historically rigid controls in the locations that are now subject to the intensification provisions have increased the price of housing in urban environments and reduced the supply of higher-density development. This is a particular issue in places that are well connected to active and public transport and close to urban centres where people can access jobs, services and amenities.

4 Definitions

Part 1, clause 1.4 of the NPS-UD provides interpretations of terms used in the policy statement. The terms that are particularly relevant to the intensification provisions are reproduced below:

- **active transport** means forms of transport that involve physical exercise, such as walking or cycling and includes transport that may use a mobility aid such as a wheelchair
- **community services** means the following:
  (a) community facilities[2]
  (b) educational facilities[3]
  (c) those commercial activities that serve the needs of the community
- **planned** in relation to forms or features of transport, means planned in a regional land transport plan prepared and approved under the Land Transport Management Act 2003
- **public transport** means any existing or planned service for the carriage of passengers (other than an aeroplane) that is available to the public generally by means of:
  (a) a vehicle designed or adapted to carry more than 12 persons (including the driver); or
  (b) a rail vehicle; or
  (c) a ferry
- **rapid transit service** means any existing or planned frequent, quick, reliable and high-capacity public transport service that operates on a permanent route (road or rail) that is largely separated from other traffic
- **rapid transit stop** means a place where people can enter or exit a rapid transit service, whether existing or planned.

Other definitions relevant to the intensification provision include:

- **city centre** is the city centre zone as described in Standard 8 (Zone Framework Standard) of the national planning standards (the standards); or a reference to the nearest equivalent zone, for local authorities that have not yet implemented the Zone Framework in the standards (see clause 1.4(4))
- **metropolitan centre** is the metropolitan centre zone as described in Standard 8 (Zone Framework Standard) of the standards; or a reference to the nearest equivalent zone, for local authorities that have not yet implemented the Zone Framework in the standards.

The key definitions and concepts are discussed in further detail in the following sections of the guide.

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2 Community facility is defined in the national planning standards.

3 Educational facility is defined in the national planning standards.

5 Analysis and evidence to support implementing the intensification provisions

To give effect to the intensification provisions, local authorities will need to understand, measure and determine:

- demand in metropolitan centre zones
- accessibility
- walkable catchments.

The sub-sections below provide further guidance on each of these components.

5.1 Relevant policies

Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:

(a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and

(b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and

(c) building heights of least 6 storeys within at least a walkable catchment of the following:

  (i) existing and planned rapid transit stops

  (ii) the edge of city centre zones

  (iii) the edge of metropolitan centre zones; and

(d) in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of:

  (i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or

  (ii) relative demand for housing and business use in that location.

Policy 5: Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:

(a) the level of accessibility by existing or planned active or public transport to a range of commercial and community services; or

(b) the relative demand for housing and business use in that location.

5.2 Definition of city centre and metropolitan centre zones

Where a local authority has not adopted the standards, then the nearest equivalent zone must be used. The standards define a 'city centre' to be "areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is the main centre for the district or region". The standards define a 'metropolitan centre' to be "areas used predominantly for a broad range of commercial, community, recreational and residential activities. The zone is a focal point for sub-regional urban catchments". Local authorities should rely on the zone descriptions and intent in the standards and compare and align this with their current zoning to work out what the nearest equivalent zone is.

5.3 Measuring demand in metropolitan centre zones

Local authorities are required to prepare a housing and business development capacity assessment (HBA) for all tier 1 and tier 2 urban environments. HBAs provide information on the demand and supply of housing and business land, and the impact of planning and infrastructure decisions on that demand and supply. HBAs will support local authorities to ensure well-evidenced decision-making.

A local authority can choose how it segments its demand (and supply) by location for its HBA. Tier 1 local authorities are required to use demand assessments to determine appropriate height limits and densities under the intensification provisions across their urban areas. For this reason, local authorities may want to carefully consider these locations. Any demand assessment by location should also take into consideration the requirement to consider demand specifically in and around metropolitan centres.

Suitable height and density is calculated as part of an HBA for a tier 1 urban environment. **Section 6.5.3** Determining relative demand for housing and business use of this guide outlines how demand and other factors could be used to determine appropriate heights and densities. More information on calculating demand will be made available on the Ministry for the Environment's **website**.

5.4 Measuring accessibility

Well-functioning urban environments provide communities with good access to social, economic and cultural opportunities (Objective 1 and Policy 1). There is a clear link between good accessibility and social, economic and cultural wellbeing, and the health and safety of all people.

> Accessibility refers to the 'level of service' as a whole and defines people's overall ability to reach desired services and activities (together called opportunities). Assessment typically examines the time, cost and amenity of accessing services and activities via different modes.

5.4.1 The purpose of planning for and providing good accessibility

Planning for and providing good accessibility makes it efficient and affordable for all people to safely access activities and social and economic opportunities such as work, education, healthcare and community services.

You can provide and improve good accessibility in many ways. For example, compact, mixed-use urban developments can enable many people to access opportunities within close proximity (eg, by walking or cycling). Rapid transit and frequent public transport services can enable people to access adjoining communities and opportunities in other parts of the city and avoid congestion at peak travel times as well as parking costs. Private vehicles can also allow people to travel long distances and access opportunities that are further away, although travel can often be affected by peak-hour congestion.

Planning for good accessibility enables prosperous communities by maximising access to opportunities while minimising travel costs and avoiding the social and economic cost of trips unable to be made.

A system view of accessibility considers the relative costs and ease of access, as well as gaps in access and service provision for important main services and destinations.

5.4.2 The accessibility requirements

Policy 1 of the NPS-UD requires that planning decisions contribute to well-functioning urban environments. Good accessibility (Policy 1(c)) is a feature of well-functioning urban environments and can be enhanced by increasing building heights and density (Policy 3 and 5). Policies 3(d)(i) and 5 require regional policy statements and district plans to enable building heights and density of urban form **commensurate with the level of accessibility** by existing and planned active or public transport to a range of commercial activities and community services.

- Local authorities need to link height/density limits with accessibility, by allowing for greater density in areas where people can easily access many jobs, services and amenities.
- Areas with the highest accessibility tend to also be places with the highest demand, where people can easily reach jobs and amenities by walking or cycling and/or using public transport.

Local authorities will need to assess the existing and planned level of accessibility to determine appropriate height and density limits in urban areas. Local authorities should be able to demonstrate how their spatial and district plans, resource consents and other RMA decisions contribute to the outcomes outlined in district plan policies. Local authorities should also be proactive in removing barriers to accessibility, for example through:

- designing new roads and connections to enable increased and safe use of active and public transport
- planning improvements to walking and cycling infrastructure, and public transport services
- encouraging mixed-use developments with a variety of housing, business and community services.

5.4.3 How to assess or determine accessibility

Accessibility can be assessed at a strategic national and regional planning level. It can also be assessed at a sub-regional and detailed neighbourhood planning level, for example, the journey to work, school and local services. An accessibility assessment can contribute to understanding the effects of proposed subdivisions, open-space provision, road, footway and cycle-path connections,

and other development applications through plan changes, resource consent applications and applications for notices of requirement.

In assessing or determining good accessibility to inform ideal and/or suitable locations and attributes for intensification, there are three key factors you need to consider as set out below:

1. People and demands

Accessibility needs vary over time, life stage and the degree of individual / household mobility. When considering accessibility needs, it is essential to consider mobility requirements at an individual and household level. For instance, a family with young children will prioritise accessibility and mobility needs around managing time and cost constraints to meet competing family demands and commuting. A retired couple will prioritise access to healthcare and extended family, but will probably drive less and possibly be less able to walk longer distances. A young couple are more likely to prioritise a broader range of social activities with a wide group of friends. The accessibility needs of these and other demographic groups vary enormously, regardless of whether these groups can access a car on a regular basis. The definition of accessibility used in the NPS-UD is one that embraces all people with varying needs and abilities.

2. Land-use proximity

A major determinant of accessibility is how close people live to economic activities and community services. Higher density, mixed-use development increases the number of people that can live close to these services and activities, making local economic activity more viable and enabling multiple-purpose trips. The locations of economic activity and community services change over time, driven in part by changes in accessibility. Proximity should translate into convenience, meaning that different land uses within an area should be easily accessed by a range of transport modes that support multi-purpose trips.

3. Transport system connectivity

Good accessibility is achieved when multiple origins and destinations are connected by a choice of safe and convenient travel options, including walking, cycling and public transport networks. Urban form contributes to viable public transport networks and safe, convenient connections by active modes. Multi-modal connectivity is achieved through creating transit-oriented urban centres which are accessible by walking and cycling and that have an appropriate mix of housing, jobs and services. This increases mode choice and enables mode shift. Walking and cycling require improved roads and pathways, more closely spaced connections and direct connections to public transport.

To measure accessibility or assess changes due to land-use or transport interventions, you will require data on where people live, the location of destinations, and the cost, time and ease of travelling between these destinations for users of each mode and for each component of the journey.

When assessing accessibility, you will also need to consider walkability as a key component of accessibility when implementing Policies 3(d)(1) and 5. Refer to **section 5.5** Walkable catchments for further information.

Typical measures of accessibility can be based on:

- the time required to reach each service (ie, on a door-to-door basis including any time waiting for a connecting service)
- the number and quality of opportunities that can be reached (eg, a general hospital has a broader range of higher-value services than a doctor's surgery)
- indices of relative accessibility based on both of the above
- value (ie, cost to reach each service including time) compared to the value provided.

5.4.4 Process for estimating accessibility

Availability of the accessibility tool and the StoryMaps interim accessibility tool

Waka Kotahi NZ Transport Agency is developing a comprehensive tool to provide detailed indicators of accessibility by walking, cycling and public transport. When available, a link to the tool will be available on the Ministry for the Environment's **website**.

In the meantime, we suggest you use the Waka Kotahi StoryMap tool. Waka Kotahi provides accessibility data in the tool, which is designed to share centralised data relevant to understanding transport problems and the benefits of investment in land transport. The tool is available to Waka Kotahi's co-investors, partners and all local authorities.

To request access to the tool, email **investment.benefits@nzta.govt.nz**. Confirmation of registration will be provided directly to the requesting organisation.[4]

Viewing accessibility results

The Waka Kotahi StoryMap accessibility tool shows the number of jobs accessible to an urban population by public transport within 45 minutes and by cycling within 30 minutes. The definition of urban areas is based on Census mapping information, which is similar but not identical to administrative boundaries. Census-mapping information is more useful for analysis purposes in this case.

At this stage, the interim accessibility tool can only provide accessibility indices on existing transport networks. The tool does not yet have the functionality to allow analysis of planned active mode or public transport networks.

The process for viewing accessibility results is as follows:

1. Locate the urban area of interest by zooming and panning the map as required.
2. Using the legend and content boxes, identify 'public transport' or 'cycling' accessibility data. Only use one data set at a time.

[4] Further information about Waka Kotahi NZ Transport Agency's Benefits Framework and the associated measures with data in the tool are available **on the NZTA website**.

3. Centre the map on the screen at an appropriate zoom level and take a screenshot of the available accessibility 'heat maps'.
4. Switch between public transport and cycling content boxes to ensure accessibility data for both modes are captured through a screenshot.

Accessibility results are sourced from SA1 (Statistical Area 1) based data. You can interrogate accessibility to jobs data within an urban area by clicking on specific SA1 areas. This will show the number of jobs available to the centroid of that SA1 area by driving (30 minutes), public transport (45 minutes) and cycling (30 minutes).

Interpreting accessibility results

All accessibility indices are measured on the basis of weekday (Tuesday) morning peak analysis in March 2020 (pre-COVID-19 lockdown). In the assessment, you should consider the frequency and capacity of the services available. The analysis uses jobs as a proxy for a range of commercial and community services that are commonly co-located. The distribution of jobs relative to the assessed population will vary according to the specific characteristics of the urban area.

Public transport indices

Access to public transport services is from the centroid of the closest SA1 unit. All data are shown for 45-minute inclusive public transport journey times and include a maximum of 800-metres walking distance to and from public transport services within this journey time. This is a practical time and distance for evaluating accessibility for intensification purposes.

The threshold at which the StoryMap tool can most effectively inform the intensification requirements (Policies 3 and 5) is at, or greater than, the 75th percentile index of the 'jobs available' metrices. The 75th percentile represents the top quarter of accessible jobs in that urban area (ie, the proportion of jobs within the urban area that are accessible within 45 minutes by public transport). Figure 2 below shows the 75th percentile accessibility index for public transport access in Dunedin, while Figure 3 shows the total number of jobs accessible by public transport.

Figure 2: **75th percentile accessibility index for public transport access for SA1s in Dunedin, for March 2020**

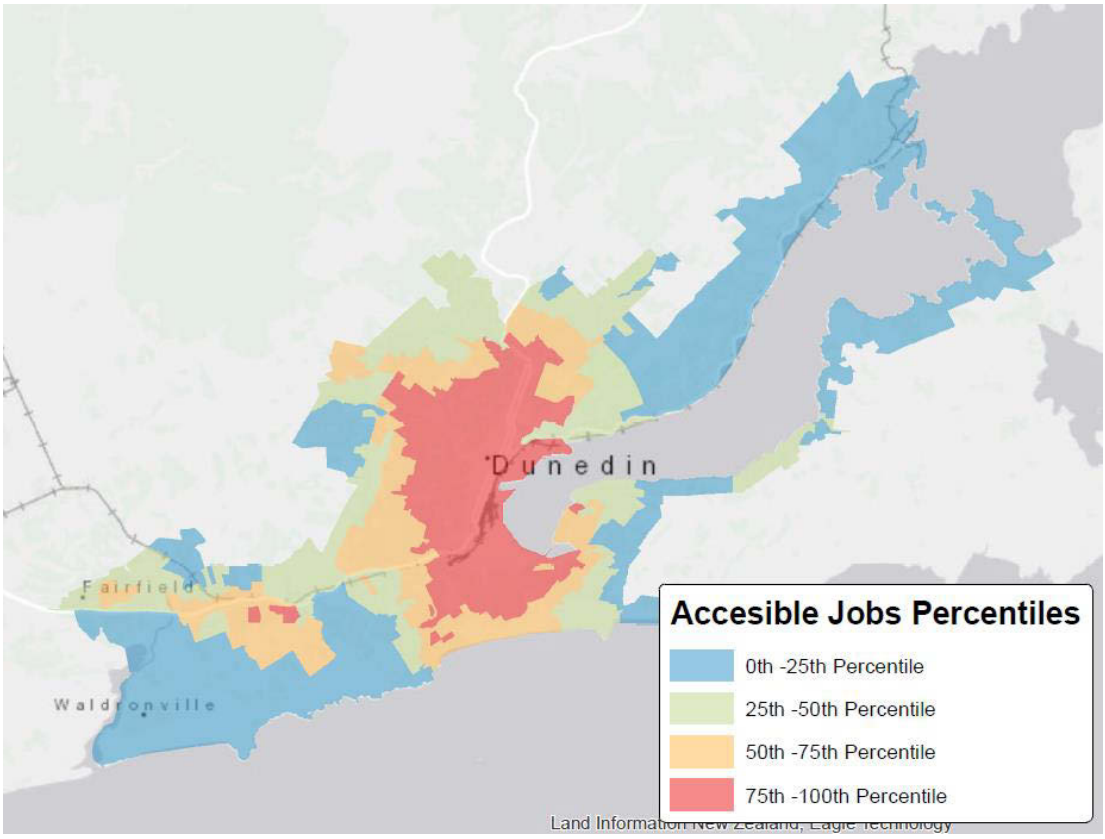
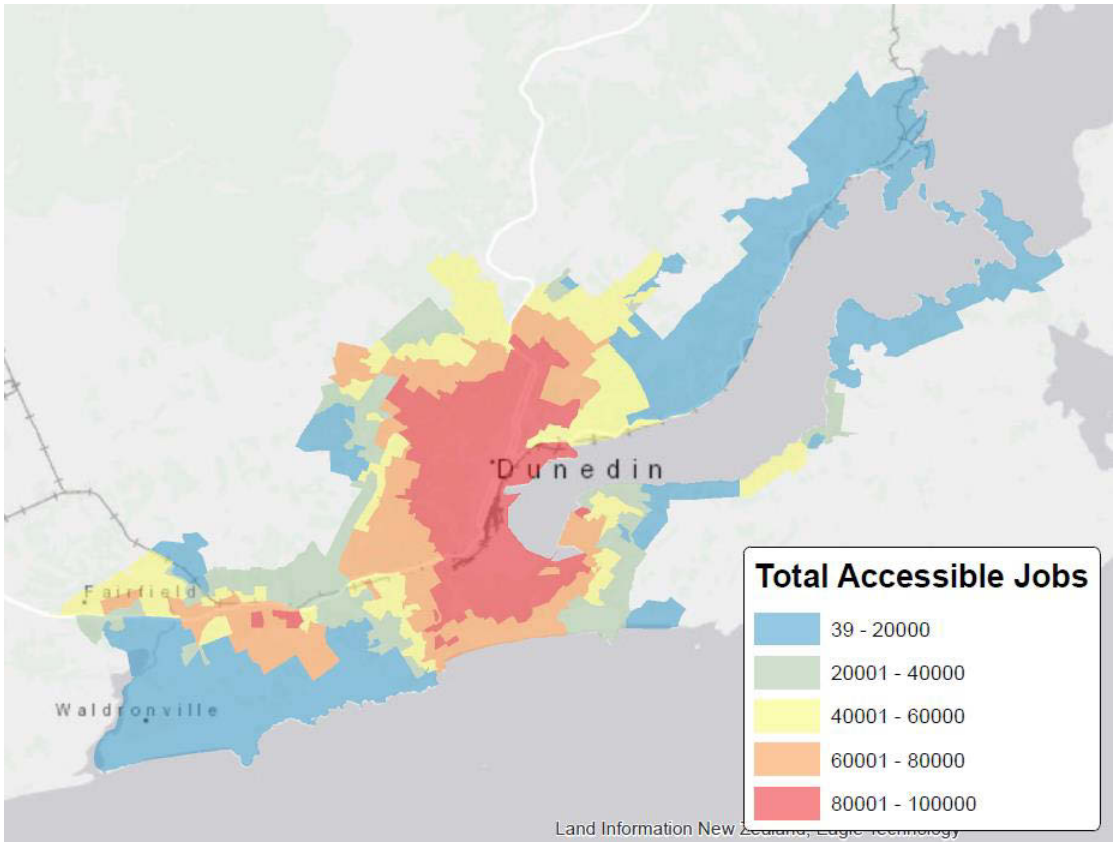


Figure 3: **Total number of jobs accessible by public transport access for SA1s in Dunedin, for March 2020**



Walking and cycling indices

You should view the walking and cycling indices as a starting point for analysis to determine the extent and scale of intensification.

We recommend you use the cycling indices to determine intensification in the absence of a detailed public transport network. Guidance on determining accessibility by walking is provided in **section 5.5** below on walkability.

The map-based cycle network includes cycle-specific infrastructure, such as off-road routes and paths, which are almost always available to pedestrians also.

A useful threshold for determining where the intensification requirements of Policies 3 and 5 are expected to apply would be at, or greater than, the 75th percentile index of the 'jobs available' metrices. The 75th percentile represents the top quarter of accessible jobs in that urban area.

Application to Policies 3 and 5

The information produced by using the accessibility tools outlined above identifies where most people can access most jobs easily by active modes and public transport. This analysis is the starting point for identifying where the relevant intensification provisions should apply.

5.5 Walkable catchments

A walkable catchment is the area that an average person could walk from a specific point to get to multiple destinations. A walkable catchment of 400 metres is typically associated with a five-minute average walk and 800 metres with a 10-minute average walk. These distances are also affected by factors such as land form (eg, hills take longer to walk up and can be an obstacle to walking), connectivity or severance (eg, the lack of ease and safety of crossing roads, highways and intersections), and the quality of footpaths. Walkable catchments can be determined either using a simple, radial pedshed analysis or a more detailed GIS (geographic information systems) network analysis.

Policy 3(c) of the NPS-UD requires tier 1 local authorities to amend their regional policy statements and district plans to enable building heights of at least six storeys within walkable catchments of existing and planned rapid transit stops and the edge of both city centre zones and metropolitan centre zones. This will require tier 1 local authorities to first determine the locations of these stops and zones, decide appropriate metrics or attributes for walkable catchments, and then use spatial analysis and other methods to determine the catchments.

Tier 2 and tier 3 local authorities do not have directive intensification requirements related to walkable catchments. However, understanding walkability and walkable catchments around public transport stops and networks and centres (city, metropolitan, local and neighbourhood) is a useful tool in thinking about what is accessible and locations that are likely to be appropriate for supporting intensification, as required under policy 5(a).

More reference material that may support you in understanding and determining walkable catchments can be found in **Resources**.

5.5.1 Important definitions for determining walkable catchments

Existing rapid transit stops

The NPS-UD defines a rapid transit stop as a place where people can enter or exit a rapid transit service. Rapid transit services are fast, frequent, reliable and high-capacity public transport services, which operate on a permanent route (road or rail) and that are generally separated from other traffic. Examples of existing rapid transit stops include train stations on the commuter rail services in Wellington and Auckland and bus stations on Auckland's Northern Busway.

For the purposes of determining walkable catchments for existing rapid transit stops, we suggest you use the pedestrian entrances and exits to the stops or stations. These better represent the location of the station as part of the pedestrian network than the station's centre point, which is often represented as a dot in the middle of the tracks and/or busway. Figure 4 below shows the pedestrian entrances to Kingsland Station in Auckland, compared to the station centre point.

Figure 4: Example of pedestrian entrances to a rapid transit stop compared to the station centre point (Kingsland Station, Auckland)

Planned rapid transit stops

The NPS-UD defines a planned rapid transit stop as one that is planned in a regional land transport plan (RLTP) under the Land Transport Management Act 2003.

Planned rapid transit stops identified in an RLTP are often only an intention to plan or build a station at some point in the future. Often the RLTP provides no specific information on the station's location. For example, the Auckland RLTP (2018) notes a number of new stations will be built for the Eastern Busway but does not show on a map where these will be. In other cases, an RLTP may only show on a map an approximate indication of where a proposed station may be.

The planning for some transport projects may be set out in other documents before these projects are added to an RLTP. Because of this, it may make sense for local authorities to use other transport planning documents to support their understanding of planned rapid transit stops and other proposed public transport and active mode infrastructure. This could include infrastructure proposed in:

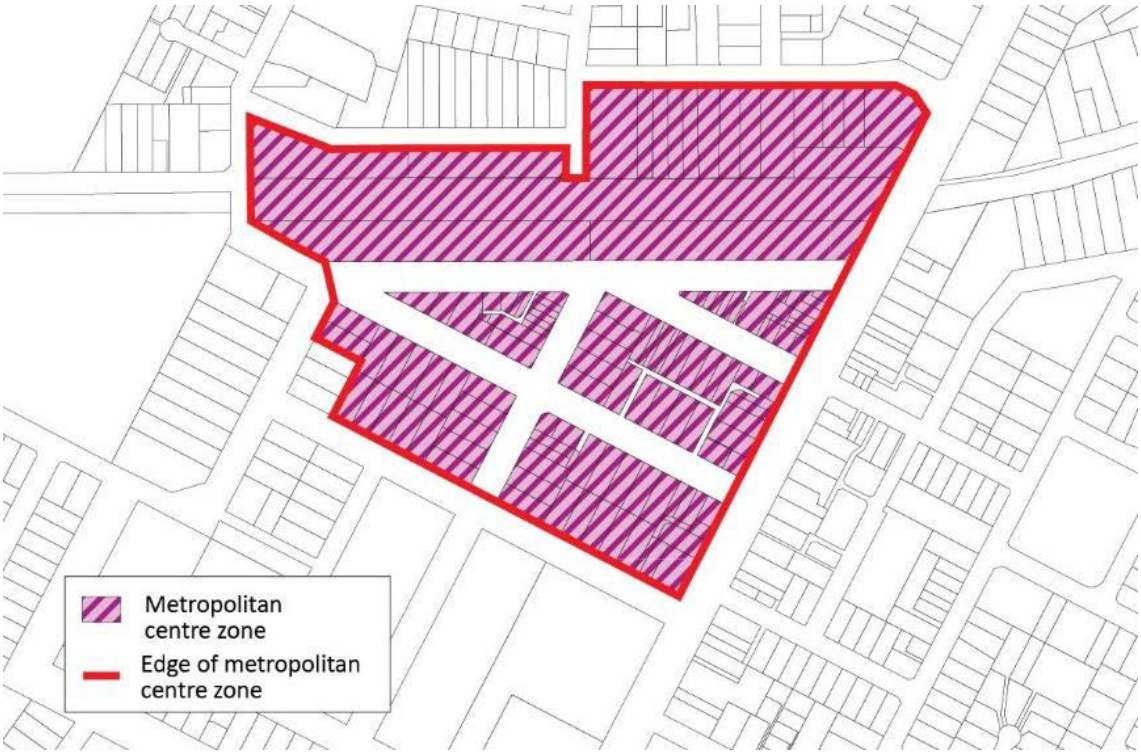
- regional spatial plans
- master planning and structure planning documents
- future development strategies
- infrastructure plans
- national infrastructure funding documents (such as the New Zealand Upgrade Programme)
- central-local government infrastructure agreements (such as the Auckland Transport Alignment Project).

It is difficult to determine a walkable catchment for a rapid transit stop before the exact location of a stop has been determined. Determining the walkable catchment requires you to assess the optimal corridor and/or location for a stop, including the potential for uplift, structure planning, transport network planning and detailed design work. Therefore, it is essential you ensure transport planning for public transport and active modes is done in an integrated and iterative way alongside land-use planning. This will be especially pertinent when considering the requirements of the NPS-UD intensification provisions, in both greenfield areas and existing urban areas.

Edge of city centre and metropolitan centre zones

Intensification will also need to be enabled within walkable catchments on the edge of city centre and metropolitan centre zones. For this, the 'edge' of the zone could be defined as the outside edge of the parcels, or groups of parcels, zoned as either city centre zone or metropolitan centre zone, including any streets or open space that may be within that area. An example is shown in Figure 5.

Figure 5: Example of edge of metropolitan centre zone



5.5.2 Size of walkable catchments

The walkability of a neighbourhood is determined by a range of factors. The general rule used by many organisations, including by the Ministry for Environment's **Urban Design Toolkit (Third edition)**, is that a walkable catchment is often around 800 metres.

The 800-metre distance was determined by assuming most people would be happy to walk 10 minutes to access services and amenities, and that they walk at a walking speed averaging 1.3 metres per second across the journey (Munro, 2009). The vast majority of people walk at speeds between 0.8 metres per second and 1.8 metres per second (2.9 kilometres per hour and 6.5 kilometres per hour) (New Zealand Transport Agency, 2009). Australian state government policies and the Ministry for the Environment's toolkit for urban design consider pedsheds (another term for walkable catchment) to be within a five- to 10-minute walk of an activity, node or urban amenity (Allen, 2018).

While the 800-metre catchment may be a good starting point, the draw of certain amenities will influence how far people are willing to walk to access them, and is likely to influence the size of a walkable catchment. While walkable catchments of 400 to 800 metres will be suitable for most tier 1 urban environments, it may be appropriate for larger tier 1 urban environments to consider greater distances in some situations. For example, where rapid transit is of high frequency, there is potential for higher densities and other factors such as high amenity along adjacent main routes and corridors.

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).

5.5.3 Different locations will have different-sized walkable catchments

Not all places are equal and different locations with different characteristics may often have different-sized walkable catchments. We should expect walkable catchments of rapid transit stops and a city centre to be larger than those of metropolitan centre zones, particularly in larger tier 1 urban environments. This is because city centres are likely to be larger, have more services and amenities, and be better connected than a metropolitan centre. Also, the convenience of using rapid transit and the connections that rapid transit services often offer, mean people are prepared to travel further to use them than other modes of public or active transport.

The centre's size can also affect the size of the catchment. For example, a smaller metropolitan centre with fewer services and amenities than a larger centre, will also be likely to have a smaller walkable catchment. Additionally, a city or a metropolitan centre with a rapid transit stop located within or close by, is also likely to have a larger walkable catchment than a centre without a rapid transit stop.

Although it is up to each local authority to determine the size of walkable catchments appropriate for local circumstances, we offer the following recommendations consistent with long-standing academic and international best practice:

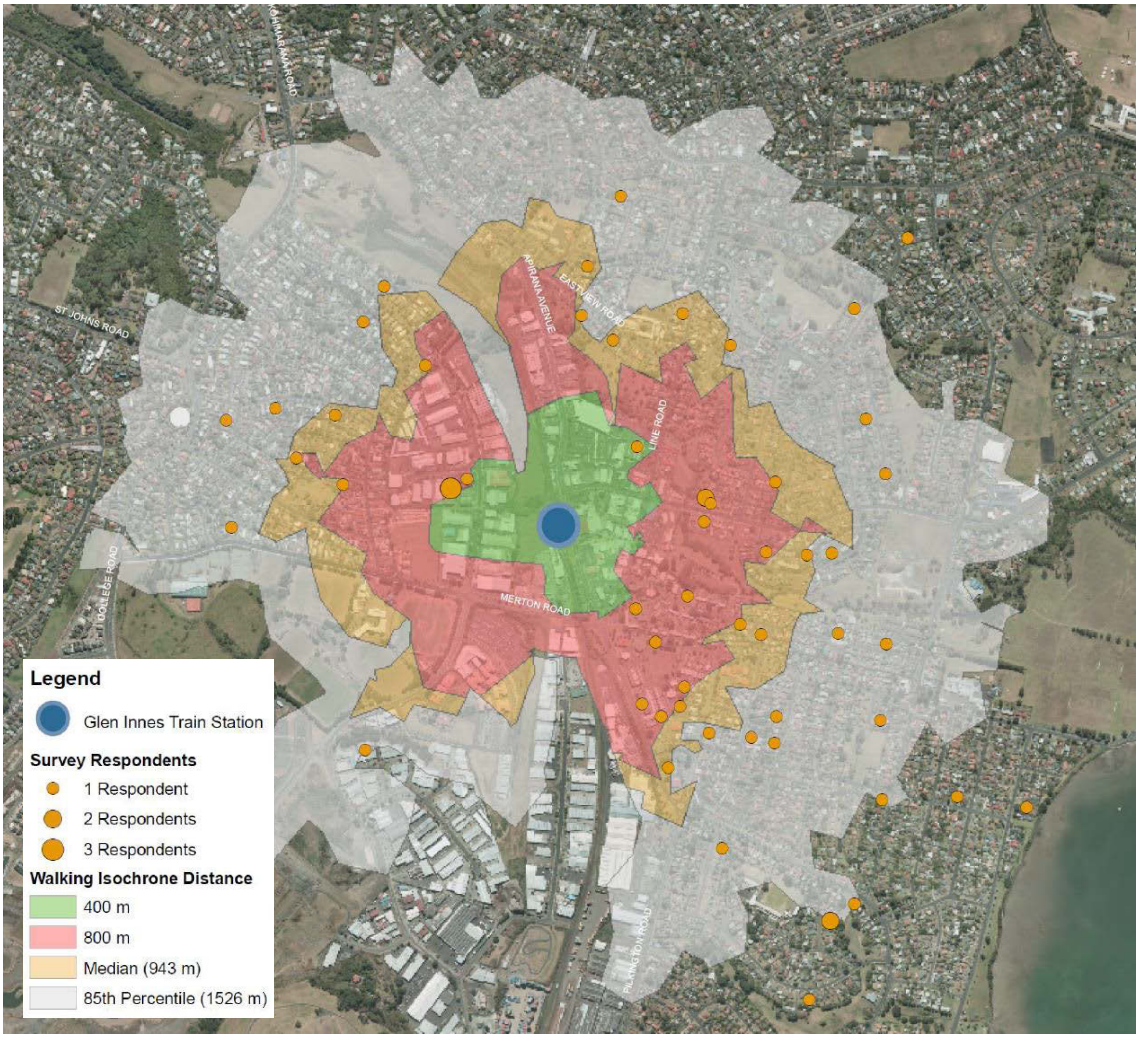
1. A distance of 800 metres from each main entrance to a transit stop is considered a minimum walkable catchment in all urban areas.
2. For larger tier 2 and all tier 1 local authorities, we suggest this threshold is extended further to account for local factors that include:
    - Street layout – are the streets laid out in a grid, or well connected through footpaths and open space that permit easier connectivity?
    - Severance – are major pieces of infrastructure or natural landscape interrupting or channelling convenient pedestrian movement?
    - Topography – how hilly or steep an area is will affect how easy or difficult it is for people to walk within a period of time.
    - Connectivity – are there footpaths on both sides of the roads? Is there access via pathways that run through reserves and open space? Are there pedestrian crossings?
    - Urban amenity – what other activities, such as local retail, pharmacy or green space, exist in streets within the extended catchment that would encourage local walking activity and multi-purpose trips?
    - Street lighting – are streets well lit, including through local footpath connections, to ensure that vulnerable groups feel secure?
    - Passive security – are footpaths and pedestrian routes overlooked by buildings with active frontages or otherwise designed to meet the security needs of vulnerable groups (noting that increased density can improve passive security)?
    - Mobility needs – is the street layout and accessible design suitable for those with mobility needs, specifically those using wheelchairs or with pushchairs, those using walking aids and other groups who may not be physically able to walk as far or as fast?
    - Other considerations – matters such as traffic light-controlled intersections, especially those that require pedestrians to wait for multiple lights to travel across a road, means a pedestrian's travel distance in a fixed period of time will be shorter.

5.5.4 Calculating walkable catchments

The most suitable way for tier 1 local authorities to calculate walkable catchments is to use spatial data and GIS. Tier 1 local authorities should have ready access to GIS software, digital road and pedestrian networks, which will enable a network analysis to determine walkable catchments. If you do not own and maintain your own digital road network that includes pedestrian access information, you can purchase these from a number of commercial providers.

You can calculate basic network catchments in GIS software, often known as isochrones, although these catchments may not always accurately represent true walkable catchments. An example is shown in Figure 6. Often, digital street and pedestrian networks do not take into account well-known walking paths and/or routes, such as those found in public parks, or other shortcuts. We recommend you check these software-generated catchments using other information, such as aerial photography and local knowledge, to ensure their accuracy.

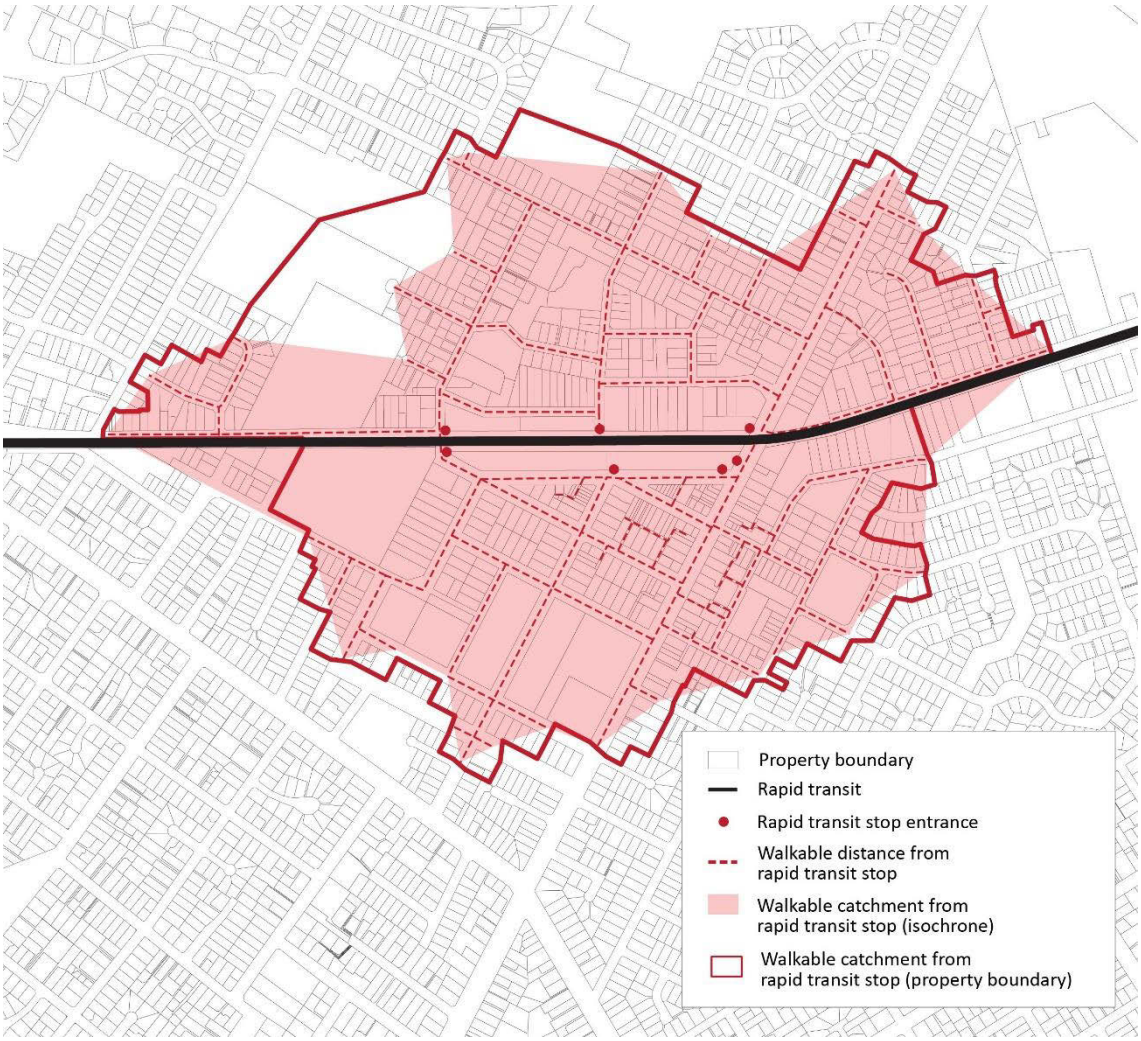
Figure 6: Example of ArcGIS generated walkable catchment isochrone for Glen Innes rail station in Auckland (Chung, 2012)



You may also want to consider using GIS-generated catchments as a guide to creating more formalised walking catchments based on property boundaries. This is because GIS-generated catchments will often cut across property boundaries, especially where properties are large. One benefit of having property-based catchments is they may help later when considering how to zone properties. Figure 7 below shows an example of the difference between a GIS-generated catchment

(isochrone) and a sense-checked, property-based catchment. This sort of assessment may also show where you could establish future walking connections.

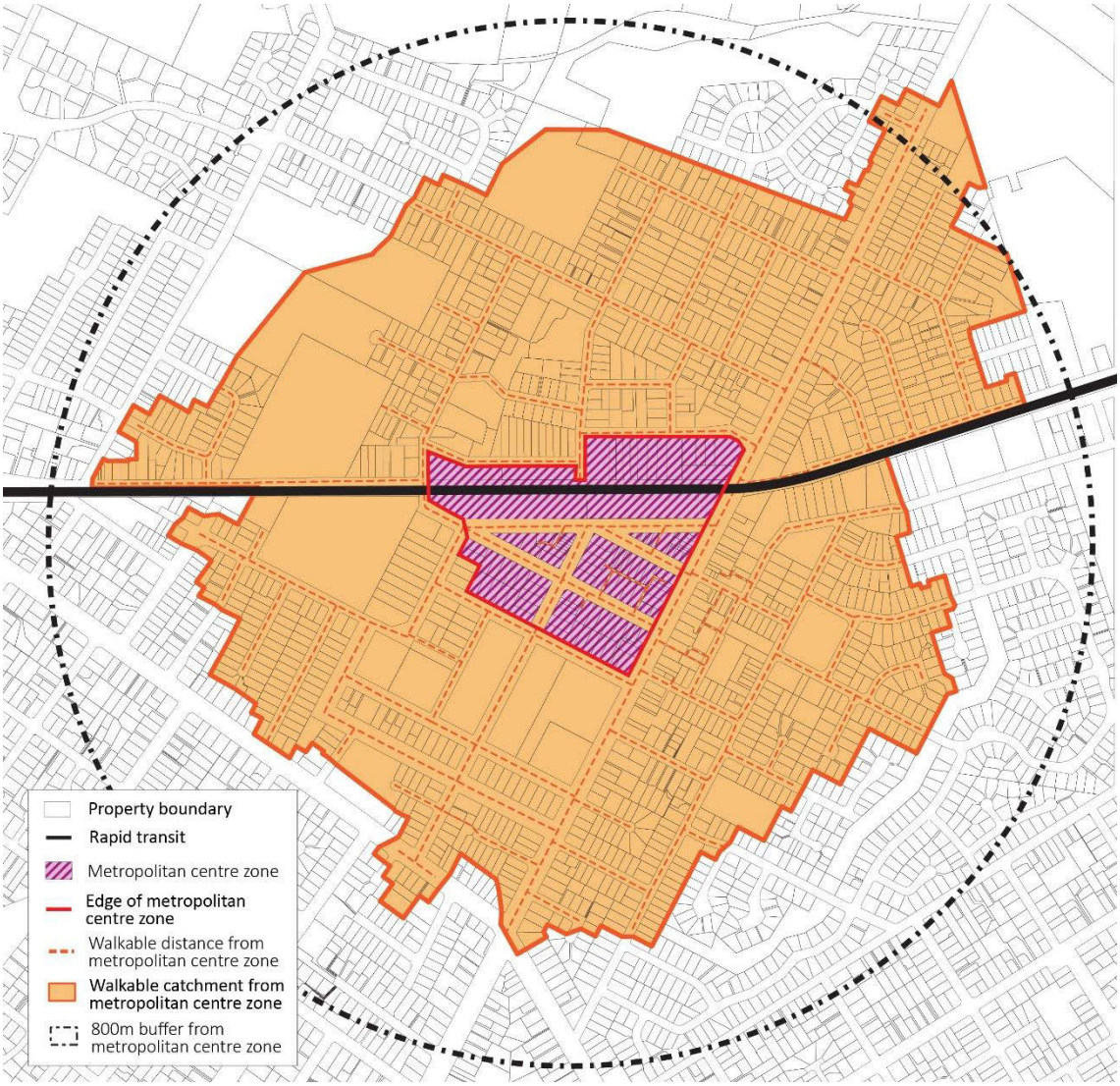
Figure 7: Example of GIS-generated catchment (isochrone) and property-based catchment for rapid transit stop



In the past, when complex digital road networks, including pedestrian access and the GIS network modelling tools to analyse them, were limited in availability and functionality, often radial circles from the centre point of an urban centre were used as a proxy for a walkable catchment. This technique is known as *pedshed* analysis. A link to a method for producing a pedshed by Active Healthy Communities can be found in **Resources**.

It is common practice to use an 800-metre diameter circle to represent a 10-minute walk for most people in a community. While these circles may have proved to be a useful proxy in the past, they often misrepresented the actual size of a centre's walkable catchment – for example, including land that did not effectively form part of the catchment or areas not accessible via the pedestrian network (Munro, 2009). Figure 8 below shows the difference in size between a property-based, 800-metre walkable catchment and an 800-metre radius circle from a centre point.

Figure 8: Example of difference between an 800-m walkable catchment from the edge of a metropolitan centre zone and an 800-m radius circle from the centre of metropolitan centre zone



While the use of a pedshed circle to illustrate catchments can be used to conceptualise locations, it is not appropriate for tier 1 local authorities to use as a proxy when considering walkable catchments. However, this approach may be suitable for tier 2 and tier 3 local authorities with smaller urban environments to understand areas that may be suitable for intensification under Policy 5(a).

Local authorities have discretion when determining what radius best matches the likely pedshed based on the local context. This may mean, in some areas, a smaller radius of 400–600 metres, for example, is appropriate for tier 2 and 3 local authorities. Pedshed analysis of city and town centres could provide a suitable indicator of locations with high levels of accessibility, especially in terms of active transport modes to a range of commercial activities and community services. Where possible, we recommend local authorities use a GIS network analysis approach.

6 Determining heights and densities to support implementing the intensification provisions

Policies 3 and 5 of the NPS-UD direct the levels and type of intensification that local authorities must enable in urban environments. The following sub-sections step through the different intensification requirements across tier 1, 2 and 3 urban environments and in particular:

- the anticipated outcomes
- principles to consider
- high-level suggestions for how to approach the work required to give effect to these policies.

District plans include a package of controls relating to built form that manage a range of effects. These controls are still relevant when giving effect to the intensification provisions.

The intensification provisions are not intended to direct local authorities to have no controls. Plans will still have development controls, however local authorities need to pay careful attention to controls that affect height and density. If the controls in a plan undermine or restrict the ability to enable intensification as directed and prevent intensification outcomes from being achieved, then those controls need to be reviewed. This does not necessarily mean removing those controls from plans, but carefully reviewing and testing each control to ensure it is balanced to enable intensification.

None of the intensification requirements are intended to override or undermine good quality urban design or quality urban environments.

You should read and consider the other provisions in the NPS-UD together with the intensification requirements. Also, local authorities should continue to ensure the intensification outcomes will support well-functioning urban environments and sensible zoning patterns. 'Sensible zoning patterns' refers to zoning that takes into account how the package of zones work together. Refer to **section 6.4** Walkable catchments (Policy 3(c)) for further detail on this concept.

The heights and densities that should be enabled by local authorities in Policies 3 and 5 will look different across urban environments. The policies require local authorities to consider the local context, while applying the principles and policy intent as outlined in **section 5** and **section 6** of this guidance. A guiding principle is that more height and density should be enabled where evidence indicates it would be appropriate. This may include areas:

- with higher residential and business demand – for example, those with good views and/or outlooks, close to open space or with good access to jobs and other amenities
- within walkable catchments of centres or rapid transit stops
- with good accessibility that support access to planned and existing forms of public transport.

When considering where to enable intensification, note that locations with both high demand and accessibility are the most suitable. However, you do not need both good accessibility and relative

demand to enable greater heights and densities. Intensification must be enabled even if you only have high demand and low accessibility or vice versa.

6.1 Relevant policies

Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:

(a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and

(b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and

(c) building heights of least 6 storeys within at least a walkable catchment of the following:

  (i) existing and planned rapid transit stops

  (ii) the edge of city centre zones

  (iii) the edge of metropolitan centre zones; and

(d) in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of:

  (i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or

  (ii) relative demand for housing and business use in that location

  .

Policy 5: Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:

(a) the level of accessibility by existing or planned active or public transport to a range of commercial and community services; or

(b) the relative demand for housing and business use in that location.

6.2 Enabling as much development capacity as possible in city centre zones (Policy 3(a))

In city centre zones, tier 1 local authorities are required to enable building heights and density of urban form to support as much development capacity as possible. This is to maximise the benefits of intensification. In practice, 'as much as possible' means removing unnecessary and unreasonable barriers to accommodate the maximum amount of development capacity that can be realised. Removing these barriers will help to enable greater up-zoning in city centres where intensification will have the greatest benefits.

Practically, 'as much as possible' will likely look different in various urban environments. City centres are a step up in the zoning hierarchy from metropolitan centres, so enabling as much development capacity as possible is expected to mean greater than six storeys (because six storeys is the minimum

for metropolitan centres). Tier 1 local authorities should be considering the level of demand and accessibility in determining what heights and densities can be enabled. In practice, this may mean:

- no maximum building heights or maximum gross floor area (GFA) standards in city centre zones or large parts of city centre zones
- development standards that may limit building height and density, where there is evidence that doing so will contribute to a well-functioning urban environment and achieving the objectives of the NPS-UD as a whole.

In giving effect to this policy requirement, local authorities need to step through the following:

- Consider what 'as much as possible' is going to mean in the city centre, taking into account local circumstances and factors – specifically, the level of demand and accessibility should be key considerations.
- Consider if any of the qualifying matters (eg, matters of national importance, open space, heritage orders or other matters) apply to the city centre. Also, look at to what extent heights and densities may need to be modified to accommodate the qualifying matter. (The qualifying matters set out the matters local authorities need to consider in enabling 'as much as possible'.)
- Review the current city centre controls and determine if they are enabling enough to support the outcomes intended in the NPS-UD and by Policy 3(a). This means checking the controls are enabling as much development capacity as possible to maximise the benefits of intensification. If not, the controls will need to be amended accordingly.
- In maximising the benefits of intensification, consider whether enough intensification has been enabled to support outcomes such as transport choice, accessibility and climate emissions reduction. If you are not maximising the benefits of intensification due to other factors (eg, character), ensure the effects of doing so have been taken into account using adequate evidence in a section 32 report.
- As directed by Policy 6, consider what 'as much as possible' will mean for the urban environment in terms of urban form, amenity changes and the benefits of urban development. Local authorities will need to ensure the specific outcome of enabling as much development capacity as possible is consistent with the wider NPS-UD policy direction.
- Consider if the outcome and/or decision on what 'as much as possible' means for the city centre environment will ensure that a well-functioning urban environment is achieved.

In some urban environments, there may be circumstances or factors, which are linked to the qualifying matters in the NPS-UD (subpart 6, clause 3.33), that will mean these will need maximum height limits or GFAs in city centre zones. Any such decisions will need to be supported by robust evidence and analysis. Where heights and density within city centres are scaled below maximum levels due to other circumstances or factors, the trade-offs of this approach should be clearly articulated in a section 32 report.

Local authorities will need to ensure they enable as much development capacity as possible and that the outcomes will deliver a well-functioning urban environment, which enables all people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, now and into the future.

Subpart 7 of the NPS-UD requires local authorities to ensure objectives, policies and rules in district plans are consistent with the outcomes required by the intensification provisions. To ensure as much development capacity as possible is enabled in city centre zones, local authorities will need to:

- clearly articulate the development outcomes intended in the city centre zone objectives
- review and, if necessary, update the rule framework to ensure development controls relating specifically to heights and densities will not undermine intensification and that the cumulative effects of district plan provisions are consistent with the outcomes required.

6.3 Metropolitan centre zones (Policy 3(b))

The requirement for tier 1 local authorities to enable at least six storeys in metropolitan centres is intended to ensure there are sufficient opportunities to enable more people to live in, and more businesses and community services to be located in, areas with high demand and good access and well-serviced by existing or planned public transport. In most cases, metropolitan centre zones will exhibit most, if not all, of these attributes.

Tier 1 local authorities are required, at a minimum, to enable at least six storeys within metropolitan centre zones. The six storeys is a minimum and not a target, with Policy 3 requiring building heights and density of urban form to reflect demand for housing and business use. There may be cases where higher heights and densities than the six-storey minimum as directed might be appropriate, for example:

- where there is a high level of demand – this could include areas with good outlooks or views, or areas adjoining or near open space, which provide higher levels of amenity
- areas with more jobs or access to job opportunities
- areas where multiple modes of transport are accessible – both public and active.

In these types of scenarios, amongst others, it would be considered appropriate to enable more intensification than the minimum requirement. This would mean, for example, that if there was demand for residential and commercial space in a metropolitan centre that required more than six storeys, then that would be what should be enabled.

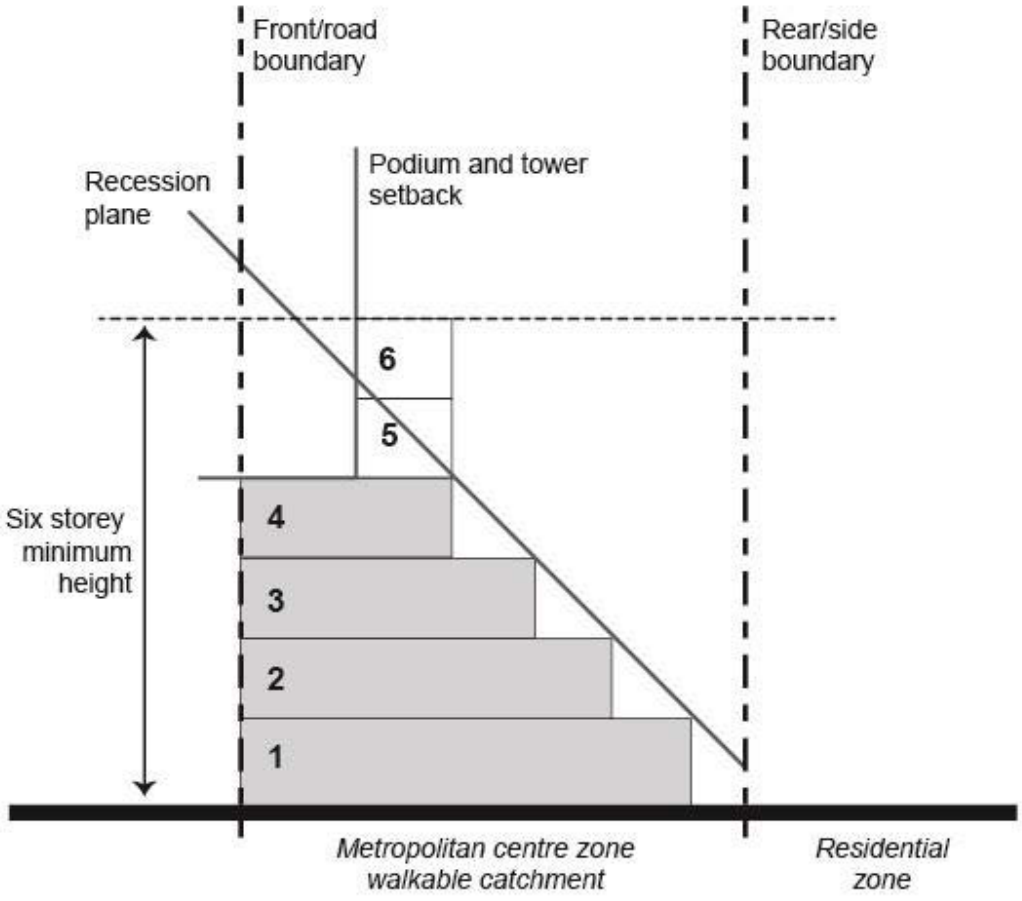
For the avoidance of doubt, the six-storey minimum is the minimum district plans must enable and not a minimum development rule. For example, local authorities are not required to set objectives, policies and rules to prevent the construction of buildings less than six storeys. While plans must enable six or more storeys, a developer or land owner can still choose to construct a four-storey building. Instead, district plans just need to be enabling, with the controls supporting the minimum height (six storeys or more) and as much yield of developable space across a site as appropriate, without compromising well-functioning urban environments. This will include:

- reviewing and, if necessary, updating provisions to enable these outcomes to be achieved, including understanding how the package of controls affects the delivery of both the minimum storey requirements and the total developable space yields. This will require understanding how the provisions relate to (but are not limited to) gross floor area, yard and podium setbacks and recession planes
- enabling maximum yield across a site – this doesn't mean density controls cannot be used but rather they shouldn't undermine or restrict these outcomes

- enabling different building typologies that support a greater yield across a site (eg, height and density).

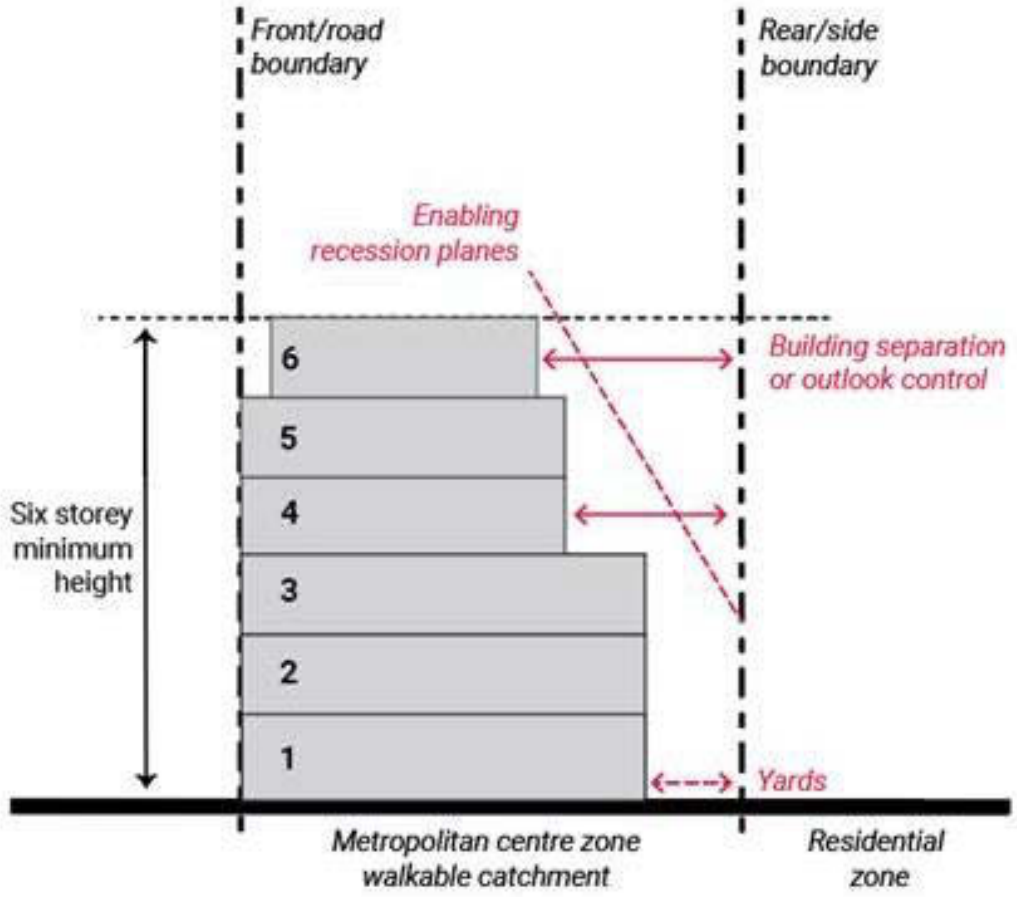
The below example (Figure 9) shows how a package of district plan rules could prevent or undermine six storeys from being realised on sites in the walkable catchment of a metropolitan centre zone. In this case, the application of rules (eg, setback from the front or road boundary and height in relation to boundary from the adjoining residential zone) in practice only allows four storeys to be realised and prevents the six minimum storeys being achieved.

Figure 9: Example of how a package of district plan controls could prevent the six-storey minimum being achieved in a metropolitan centre zone walkable catchment



Instead, local authorities should ensure the package of district plan rules allows six storeys to be realised on sites. Figure 10 below shows how district plan rules and controls can enable six storeys. In this case, recession planes may still be appropriate but need to enable flexibility at upper floors. In combination with other controls (eg, yards), increased recession plane angles and projection heights can support taller buildings. For example, these recession planes can still enable adequate daylight or sunlight to adjacent sites or zones, as well as encourage some building setback at upper levels to reduce perceived building height and visual dominance. Local authorities should also consider providing a gradual step down in zones and where to locate zone boundaries to avoid interface issues with adjoining zones.

Figure 10: Example of how a package of district plan controls could enable the six-storey minimum in a metropolitan centre zone walkable catchment



6.4 Walkable catchments (Policy 3(c))

The minimum height is also six storeys for areas within a walkable catchment of rapid transit stops, or the edge of city centre and metropolitan centre zones (refer **section 5.5** Walkable catchments). Again, six storeys is the minimum and not a target and, in many cases, local authorities should enable higher than six storeys, especially where there is evidence higher buildings would be appropriate, including when:

- the HBA for the urban environment shows there is high demand for residential and commercial space in a walkable catchment
- a walkable catchment of a city centre zone or metropolitan centre zone also falls within a walkable catchment of a rapid transit stop
- a walkable catchment enables access to planned and existing forms of public transport, especially frequent public transport services.

While enabling a minimum of six storeys is required within walkable catchments of city centre and metropolitan zones and rapid transit stops, it is likely there are cases where higher heights and greater density (ie, greater than six storeys) are appropriate within these walkable catchments that local authorities should consider. This will depend on local circumstances and evidence. An example might include:

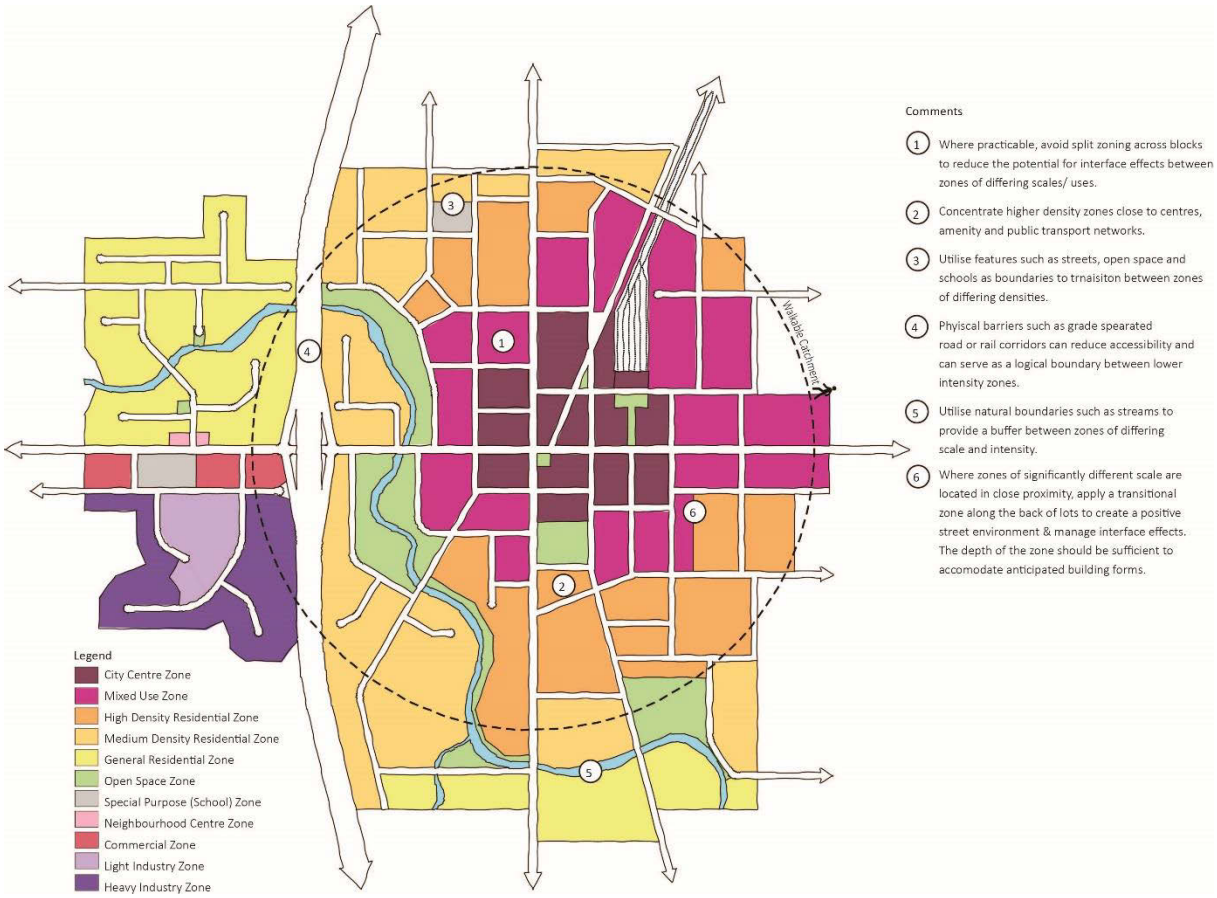
- Local authorities may wish to graduate or step down building heights, from the edge of their city centre or metropolitan centre zones that may have height limits considerably higher than six storeys, to the minimum six storeys that must be enabled inside, and to the edge of, walkable catchments.

As noted earlier, when enabling a minimum of six storeys within walkable catchments, local authorities should take care to ensure an appropriate zoning pattern is achieved. This is necessary to ensure there is consistency in the way areas are zoned and to ensure issues that can arise where different zones interface do not impact on delivering the other objectives of this NPS, such as well-functioning urban environments. Some key considerations for intensification in achieving sensible zoning patterns include:

- consistency in the way areas are zoned and how the different zones are applied
- interface of zones and avoiding putting zones side by side – this could include using steps down in zones to avoid the impacts on more sensitive zones
- integrating zones and trying to align or create more natural transitions between compatible zones.

In achieving a sensible zoning pattern as described above, local authorities will still need to ensure they enable at least the relevant height minimums. Figure 11 below provides one example of a sensible zoning pattern for intensification, achieving a gradual step down.

Figure 11: Sensible zoning patterns for intensification achieving a gradual step down



6.5 Enabling building heights and density commensurate with accessibility and demand (Policies 3d and 5)

Policy 3(d) for tier 1 local authorities and Policy 5 for tier 2 and 3 local authorities of the NPS-UD requires building heights and densities of urban form to be enabled commensurate with the:

- level of accessibility by existing or planned active and public transport to a range of commercial activities and community services, or
- relative demand for housing and business use in that location.

For tier 1 urban areas, this will be for all areas outside of city centre and metropolitan centre zones, as well as walkable catchments of existing and planned rapid transit stops and the edge of city centre and metropolitan centre zones.

Tier 2 and tier 3 urban areas will need to apply Policy 5 to their entire urban area.

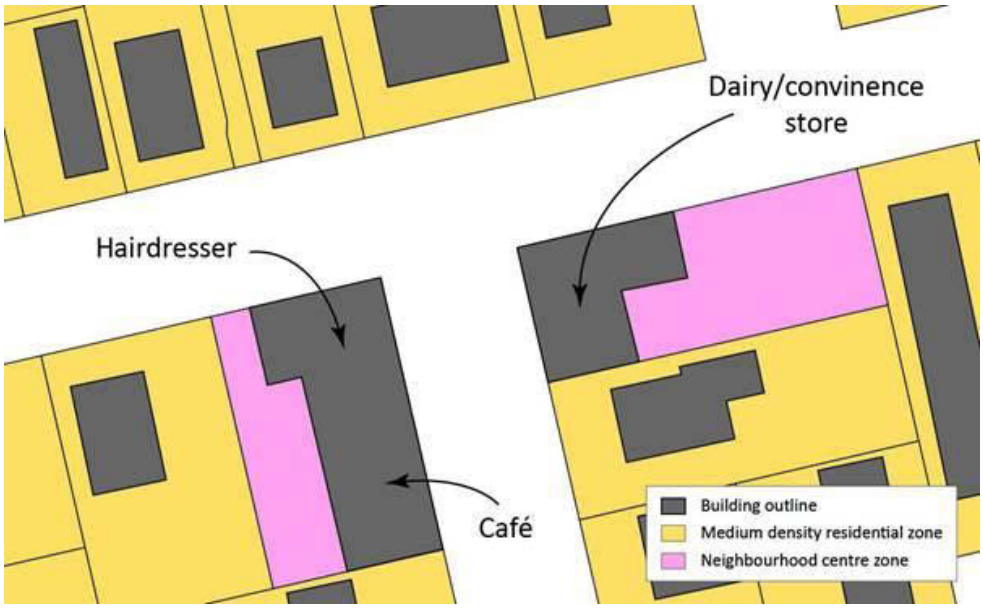
6.5.1 A 'range' of commercial activities and community services

Commercial activities include those that serve the needs of the community (eg, shops) and provide people with employment. Community services include health care, education (including universities and tertiary training institutes), cultural activities (eg, museums, galleries, churches) and land or venues for sport and recreation.

A 'range' of services should be thought of as a variety of commercial and community services that serve the needs of the catchment when implementing this policy. For example, a doctor and/or pharmacy, school and/or kindergarten and a café and shops would be considered as providing a range of services. The locations that provide a range of activities and services are likely to be places that are easily accessible to a wide range of people. These locations will often be commercial centres within urban areas, ranging in size from smaller local or town centres through to larger metropolitan centres or even city centres (in the case of tier 2 and tier 3 urban environments).

This also means a small set of neighbourhood shops, for example with amenities such as a dairy, hairdresser and butcher, would not likely be considered to be providing a range of services. An example of neighbourhood shops that would not be considered to provide a range of services is shown in Figure 12 below.

Figure 12: Example of neighbourhood shops that do not provide a 'range of services'



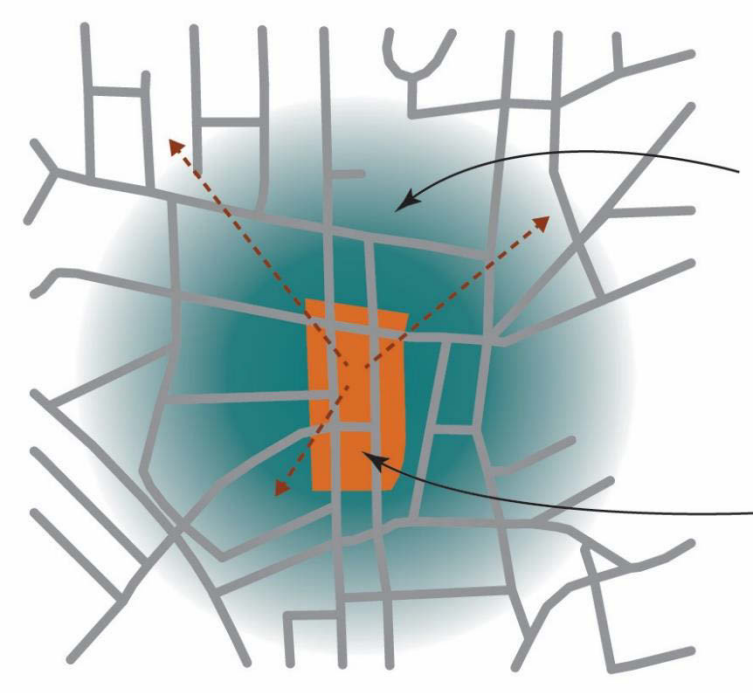
6.5.2 Determining the level of accessibility to a range of services

Guidance on accessibility is provided in **section 5.4** Measuring accessibility above. This section should be referred to when determining accessibility.

Areas closer to a range of services will have a higher level of accessibility than areas further away from services. This means the level of accessibility will range from higher to lower, depending on the distance from a range of services. Heights and densities enabled must be commensurate to the level of accessibility. This means areas with high accessibility (ie, those areas closest to a range of services) should have greater heights and densities enabled which (depending on the level of demand) may gradually decrease as you move away from the services and as accessibility reduces. If you have both high demand and high accessibility, you may find heights and densities do not gradually decrease like they could if you were intensifying based on high levels of accessibility only.

Below, Figure 13 shows how accessibility to a range of services, represented by a town centre, decreases as you move further away from them. In such a case, district plan rules should reflect that heights and densities would need to be greater the closer or more accessible they are to services. This figure illustrates accessibility by active modes. The area that is considered accessible by public transport could be much larger (if frequent public transport services operate in this area).

Figure 13: Example of a 'range of services' interacting with accessibility only and how this influences heights and density



6.5.3 Determining relative demand for housing and business use

Determining relative demand for housing and business use to enable commensurate heights and density or urban form will be undertaken differently for tier 1, 2 and 3 local authorities.

In preparing the intensification plan changes, some principles or types of areas where demand is often high and intensification is likely to be appropriate could include:

- areas with high land prices relative to others
- locations close to open space and recreation opportunities
- areas within, or close to, centres
- areas with good transport opportunities – including frequent public transport, multi-mode transport opportunities (eg, public transport, walking and cycling) and freight
- areas close to key services including, schools, hospitals and supermarkets
- areas close to a range of business activities
- locations with good views, outlook and amenity, including areas with water views or green space outlooks.

Determining and understanding relative demand in tier 1, 2 and 3 urban areas could be achieved through a number of different methods. As a general starting point for all local authorities, land price is a good proxy to consider in understanding demand; areas with high land prices indicate the areas are more desirable to live in. When combined with capital values in an area, this will help highlight locations where it is desirable and/or feasible to deliver intensification.

Methods to understand and determine demand that local authorities may use include:

- using information produced as part of an HBA for tier 1 and 2 local authorities
- using population and growth projections and statistics for the areas or regions – this may be particularly helpful for tier 3 local authorities
- analysing recent resource consent data to highlight areas where there may be high demand, such as:
  - areas where a number of consents have been lodged for housing and business use
  - the number of consents seeking to infringe standards such as maximum building height, building coverage and height in relation to boundary gross floor area, or
  - other development controls that impact on the development potential of a site
- surveying consumer preferences under scenarios where higher-density housing is permitted using highly flexible zoning and building rules (ie, unconstrained demand for a greater range of housing types and prices). Additionally, local authorities could engage with the development sector to understand preference
- monitoring economic indicators such as land prices. As noted above, these can be used as a proxy to indicate demand; if comparable land prices are high, it would suggest there is higher relative demand.

One particular method an HBA can use to understand areas of high demand in an urban area is analysing the capital value-to-land value ratio of properties. This is detailed in **the Guide on Evidence and Monitoring,** which was produced to support the implementation of the National Policy Statement on Urban Development Capacity (2016).

A high land value-to-capital value ratio can indicate the land is in a location of high demand and the land use is under-capitalised. This is likely to mean it is feasible to redevelop for greater intensification. For example, when the relative price of a land parcel rises, it is a signal people want to live and work in that location. Land with low capitalisation is easier and more profitable for development because most of the value is in the land (as shown in the **cost-benefit analysis for the NPS-UD**). Under-capitalisation might also be in relation to a disparity between the current and possible land use, such as what is there now and what could be provided if greater density was enabled. This indicates these places could be suitable for intensification.

The matrix shown in table 2 below shows how local authorities could use this metric to understand and identify areas most suitable for intensification.

Table 2: Capitalisation and land value and suitability for redevelopment and intensification

	Low land value	High land value
High capitalisation	Low value land and high capitalisation, unlikely to be redeveloped Areas of low demand, likely not suitable for intensification	Valuable land and high capitalisation, limited likelihood of redevelopment Areas of some demand, may suitable for intensification
Low capitalisation	Low value land and low capitalisation, unlikely to be redeveloped Areas of some demand, may suitable for intensification	Valuable land and low capital value, likelihood of redevelopment Areas of most demand, most suitable for intensification

The Ministry of Housing and Urban Development (HUD) have done some work on understanding the costs of growth. This work includes developing a methodology for local authorities to understand and measure the wider costs and benefits of different forms of urban development in different locations. We also expect the methodology could be used as an input into HBAs and to assess appropriate areas for intensification. The methodology will be available by the end of 2020.

When determining demand, tier 3 local authorities could also look to their centre type zones (city centre, town centre, neighbourhood centre), where demand and access is likely to be greatest, as starting points for locations that are best suited for intensification.

While tier 3 local authorities are not required to undertake an HBA, they must undertake basis evaluations and analysis as directed in subpart 3, clause 3.9 of the NPS-UD – for example, analysing the price of and rents for dwellings can assist in understanding housing demand. They may also wish to apply and consider the principles of an HBA to determine demand including:

- current supply of housing and whether there is additional demand
- housing affordability across the district
- location of housing
- dwelling typologies – for example, is there a shortage or desire for a particular typology
- number of dwellings that can reasonably be expected to be realised.

Heights and densities enabled in urban areas must be commensurate to the level of demand. This means areas with high demand should enable greater heights and densities than areas with low or no demand.

6.5.4 What this means for intensification outcomes

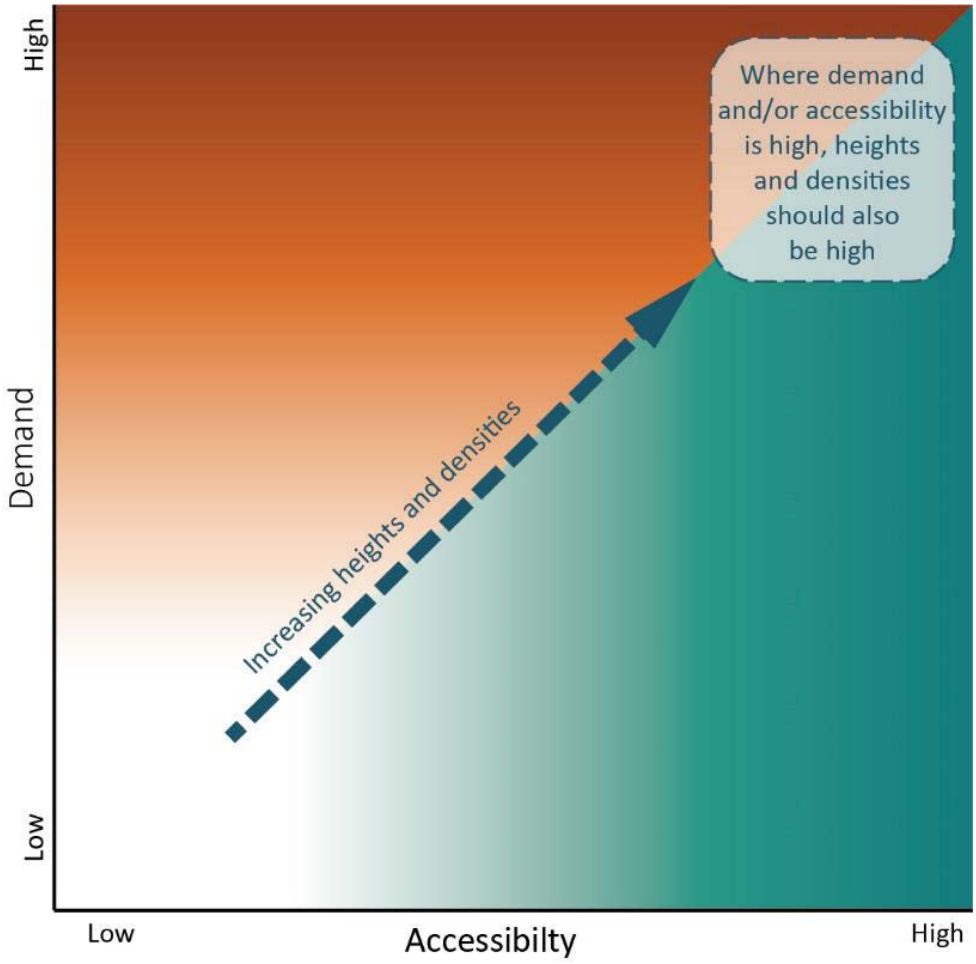
Enabling heights and density of urban form commensurate to accessibility and demand is going to look different across urban environments of varying size. It is important local authorities remember:

- you do not need both good accessibility and higher relative demand to enable greater heights and densities
- if you have high demand but no/low/moderate accessibility you still need to ensure greater heights and densities are enabled
- if you have high accessibility but no/low/moderate demand you still need to ensure heights and densities that reflect the level of accessibility are enabled
- if you have both high demand and high accessibility then you should be seeking to enable more height and density in those areas, as these are the most suitable to accommodate intensification.

In all the above situations, it is important intensification is enabled in a way consistent with meeting the definition of well-functioning urban environments (Policy 1).

Figure 14 below illustrates visually how you could think about enabling heights and densities when assessing a location against demand and accessibility. By plotting on the graph a location's demand and accessibility, you can understand the extent to which you should enable density and heights. The higher a location's accessibility or demand, the more enabling your density and heights will need to be.

Figure 14: Example framework for determining heights and densities for other areas in tier 1 urban environments



The building height and density of urban form that is enabled through development standards will result in different housing typologies and business uses.

Different housing typologies exist (see Figure 15 below) which result in a range of heights and densities. These include:

- detached single-level houses
- townhouses
- duplex and multiplex houses
- terrace housing
- apartments.

Figure 15: Spectrum of housing typologies

In general, terrace housing and apartments will have greater heights and densities than townhouses and detached single-level houses. Local authorities will need to think about the spectrum of typologies and outcomes that are appropriate to be enabled, based on the level of accessibility and demand. For example, if you have high accessibility and high demand it could be appropriate to enable apartments and more intensive business uses in an area.

6.5.5 Amending district plans

The level of accessibility and demand will be different across urban areas. Therefore, local authorities should consider options for implementing the intensification provisions through changes to regional policy statements and district plans. In giving effect to the intensification provisions, this could mean:

- rezoning areas to enable greater building height and density
- amending the development standards for an existing zone to enable commensurate heights and densities
  - there may be instances where most of an existing zone is suitable for intensification, with a small area that might not be suitable because it does not meet the accessibility or demand criteria. For consistent zoning outcomes, local authorities may decide to enable greater height and density throughout the zone
- using other planning tools such as:
  - precincts: in instances where there are various pockets across urban zones suited to intensification, but it is inappropriate to enable greater building heights and densities across the entire zone, local authorities could consider using a precinct to enable greater heights and densities within specific areas of an existing zone. Refer to Standard 12 (District Spatial Layers Standards) of the standards for further information on precincts
  - specific control: the standards provide for ‘specific controls’ to spatially identify where a site or area has provisions that are different from other spatial layers, or where district-wide provisions apply to that site or area. Particular areas of a zone may be suited to intensification, but it is inappropriate to enable greater building heights and densities across the whole zone. In these instances, local authorities could consider using a specific control to enable greater heights and densities within specific areas of an existing zone. Refer to

Standard 12 (District Spatial Layers Standards) of the standards for further information on specific controls.

6.6 Qualifying matters – application

The directive intensification outcomes in Policy 3 for tier 1 local authorities are designed to enable higher densities in locations where it is most suited. However, there may be some areas that are not suitable for higher levels of intensification, or any intensification because of a qualifying matter. Where a qualifying matter applies, this does not mean intensification should not be enabled, rather that local authorities should carry out a comprehensive analysis and must seek to enable the greatest heights and densities possible while managing the specific qualifying matter (clause 3.32 and 3.33).

6.6.1 Relevant policy

Policy 4: Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area.

Subpart 6, clause 3.32 Qualifying matters

(1) In this National Policy Statement, **qualifying matter** means any of the following:

- (a) a matter of national importance that decision-makers are required to recognise and provide for under section 6 of the Act
- (b) a matter required in order to give effect to any other National Policy Statement
- (c) any matter required for the purpose of ensuring the safe or efficient operation of nationally significant infrastructure
- (d) open space provided for public use, but only in relation to the land that is open space
- (e) an area subject to a designation or heritage order, but only in relation to the land that is subject to the designation or heritage order
- (f) a matter necessary to implement, or ensure consistency with, iwi participation legislation
- (g) the requirement to provide sufficient business land suitable for low density uses to meet expected demand under this National Policy Statement
- (h) any other matter that makes high-density development as directed by Policy 3 inappropriate in an area, but only if the requirements of clause 3.33(3) are met.

Subpart 6, clause 3.33 Requirements if qualifying matter applies

(1) This clause applies if a territorial authority is amending its district plan and intends to rely on Policy 4 to justify a modification to the direction in Policy 3 in relation to a specific area.

(2) The evaluation report prepared under section 32 of the Act in relation to the proposed amendment must

(a) demonstrate why the territorial authority considers that:

(i) the area is subject to a qualifying matter; and

(ii) the qualifying matter is incompatible with the level of development directed by Policy 3 for that area; and

(b) assess the impact that limiting development capacity, building height or density (as relevant) will have on the provision of development capacity; and

(c) assess the costs and broader impacts of imposing those limits.

(3) A matter is not a qualifying matter under clause 3.32(1)(h) in relation to an area unless the evaluation report also:

(a) identifies the specific characteristic that makes the level of development directed by Policy 3 inappropriate in the area, and justifies why that is inappropriate in light of the national significance of urban development and the objectives of this National Policy Statement; and

(b) includes a site-specific analysis that:

(i) identifies the site to which the matter relates; and

(ii) evaluates the specific characteristics on a site-specific basis to determine the spatial extent where intensification needs to be compatible with the specific matter; and

(iii) evaluates an appropriate range of options to achieve the greatest heights and densities directed by Policy 3, while managing the specific characteristics.

6.6.2 Qualifying matters

When giving effect to the Policy 3 (a, b, c and d) of the NPS-UD, tier 1 local authorities may modify, but only if necessary, the intensification requirements as directed if one of the qualifying matters in the NPS-UD apply. Qualifying matters mean any of the matters listed in subpart 6, clause 3.32. The matters are very specific, with the exception of 3.32(h) relating to 'other matters', which may also qualify for making higher-density development inappropriate. Where local authorities wish to use clause 3.32(h), a more robust evidence base is required to justify why intensification requires modification through a site-specific analysis, and also the requirements in clause 3.33(3) must be met. Some examples of what might be anticipated to be raised as an 'other matter' include:

- special character
- viewshafts
- less significant hazard risk, that is not covered by s6 of the RMA.

Where a qualifying matter is applicable for a tier 1 local authority, this does not mean intensification is excluded from an area, but instead that it is to be modified only to the extent necessary to accommodate the qualifying matter.

In addition, in the case of 'other' matters, it does not mean local authorities cannot have viewshafts or special character, for example. These can be retained where evidence supports their need. The qualifying matters simply provide the scope for local authorities to modify the level of intensification if it is required to protect the specific matter.

Local authorities will need to consider what qualifying matter is applicable carefully and then undertake a detailed assessment to determine the most appropriate level of intensification. This may look like:

- reduced building heights from the applicable minimum height required
- lower densities than the applicable minimum density required
- no intensification (although this is expected to be an exception).

This assessment will only be required if one of matters listed in clause 3.32(a–g) means that intensification will be limited.

6.6.3 Process to applying a qualifying matter

For any qualifying matter listed in subpart 6, clause 3.32 (a–g), for a tier 1 local authority to modify the intensification levels below those anticipated in Policy 3, an evaluation report must be prepared under section 32 of the RMA. This section 32 report must include and consider the following aspects in light of the requirements in subpart 6, clause 3.33:

- identify spatially, by location, where the qualifying matter applies, for example, a map showing the area to be assessed for a qualifying matter
- determine why an area is considered subject to a qualifying matter
- determine why the qualifying matter makes an area and/or site incompatible with the level of development directed by Policy 3 for that area
- assess the impact that limiting the development capacity, building height or density will have on providing development capacity overall
- assess the costs, benefits and broader impacts of imposing lower intensification levels in the area
- identify the appropriate alternative level of intensification for the area.

If a local authority believes there is an 'other' qualifying matter which is applicable under **subpart 6, clause 3.32(h)**, then a more detailed and robust assessment and higher evidential standard is required. In addition to the above matters, the following further evidence base must be prepared:

- identifying the specific characteristic or 'other matter' that makes the level of development directed by Policy 3 inappropriate
- justifying in the form of a detailed analysis and mapping to demonstrate why intensification is inappropriate (in light of the qualifying matter, the national significance of urban development and objectives of the NPS)
- conducting a site-specific analysis of the 'other matter' and where it needs to apply, such as the exact boundaries where intensification is inappropriate. Local authorities will need to undertake a site-by-site assessment, identifying the extent of the site or sites in the area subject to a qualifying matter. They will need to evaluate the specific characteristics on a site-specific basis to determine the spatial extent where intensification needs to be compatible with the specific matter
- evaluating an appropriate range of options of alternative heights and densities that could be applied to establish the best option to achieve the greatest heights and densities directed by Policy 3, while managing the specific characteristics.

Note that a blanket overlay approach to applying the qualifying matter is not appropriate. The qualifying matter should only apply to the specific, spatial extent required.

In practice, this means that:

- local authorities will need to justify their decisions on what 'as much development capacity as possible' means for determining heights and densities for a city centre zone with robust evidence in a section 32 report. They will also need to take into account any justifications under subpart 6, clause 3.33
- in metropolitan centres and other locations that require height limits of at least six storeys, local authorities will only need to provide justification where they believe a height limit needs to be less than six storeys, with site-specific analysis required if heights are being lowered due to an 'other matter'
- local authorities will need to justify any height limits or densities lower than what is standard in their plans for that zone, in other areas identified as suitable for intensification, either due to being in a location of high demand or having good access
- local authorities may review, reduce or remove spatial application of 'other' matters, such as viewshafts, following assessment to enable greater intensification.

If tier 1 local authorities wish to modify heights and densities of intensification because of a qualifying matter, it is important they provide a robust evidence base and section 32 analysis, which clearly articulates the trade-offs of having less intensification.

They should answer the following questions in their analysis:

- What is the qualifying matter?
- Why is the qualifying matter something that is being considered within the specific location?
- What would be the implications of enabling intensification as directed by Policy 3?
- What area does the qualifying matter cover or what is the spatial extent?
- Why does the qualifying matter require heights and densities to be reduced and by how much?
- Are there alternative approaches or mitigations that could be put in place to avoid the need to reduce intensification? If not, why?
- How does limiting or reducing intensification in the area impact development capacity?
- What alternative to building height and density is appropriate without compromising the qualifying matter? What are the options?
- What are the trade-offs of not intensifying as directed?

Local authorities need to be mindful that just because a qualifying matter may apply or have been identified over a specific area, this does not mean intensification is inappropriate or should not be enabled. The level of intensification that may be enabled within areas where a qualifying matter applies may vary due to site-specific factors. Several different outcomes may be reached following the robust analysis and evaluation required under subpart 6, clause 3.33. For example:

- no intensification may be appropriate
- intensification as directed may not be achievable across the area but some intensification can be enabled

- areas within the extent of the qualifying matter may require lower intensification requirements, whereas intensification as directed by Policy 3 may be achievable in other sites within the wider spatial extent due to site-specific factors (eg, topography).

6.6.4 Qualifying matter ('other matter') – worked example

Figure 16: Step 1 – Identify the other qualifying matter or specific characteristic

Identify what the 'other' qualifying matter is – what is the specific characteristic, for example, view shaft, special character overlay that makes intensification as directed inappropriate.

Identify the area that the specific qualifying matter/specific characteristic applies, for example, the spatial extent.

Justify and clearly demonstrate why the qualifying matter needs to be considered and why intensification in the specific area is inappropriate in light of the importance of urban development and the objectives of the NPS-UD.

Figure 17: Step 2 – Undertake a site-specific analysis of all sites with the area that the qualifying matter applies

Undertake a site-specific analysis of all sites within the area that the qualifying matter applies.

Identify what the implications of enabling intensification as directed by Policy 3 would be.

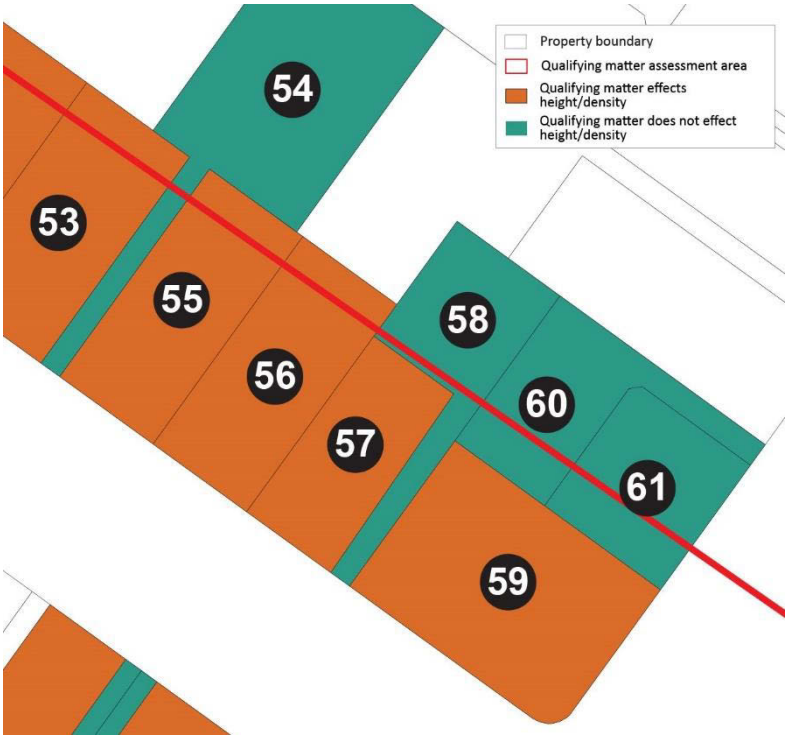
Evaluate how and why the qualifying matter applies to each individual site.

Consider and clearly articulate the trade-offs of not enabling intensification as intended.

Undertake a cost-benefit analysis of a lower level of intensification.

Determine whether there are other mitigations or alternative approaches that could be put in place to avoid the need to reduce intensification.

Figure 18: Step 3 – Determine whether there are site-specific factors that may affect the level of intensification that can be realised eg, topography



Determine whether there are site-specific factors that may affect the level of intensification that can be realised, for example, topography.

Evaluate a range of options for each site within the qualifying matter area to achieve the greatest heights and densities possible, while managing the specific qualifying matter – for example, determine the different heights and densities that could be enabled without compromising the qualifying matter.

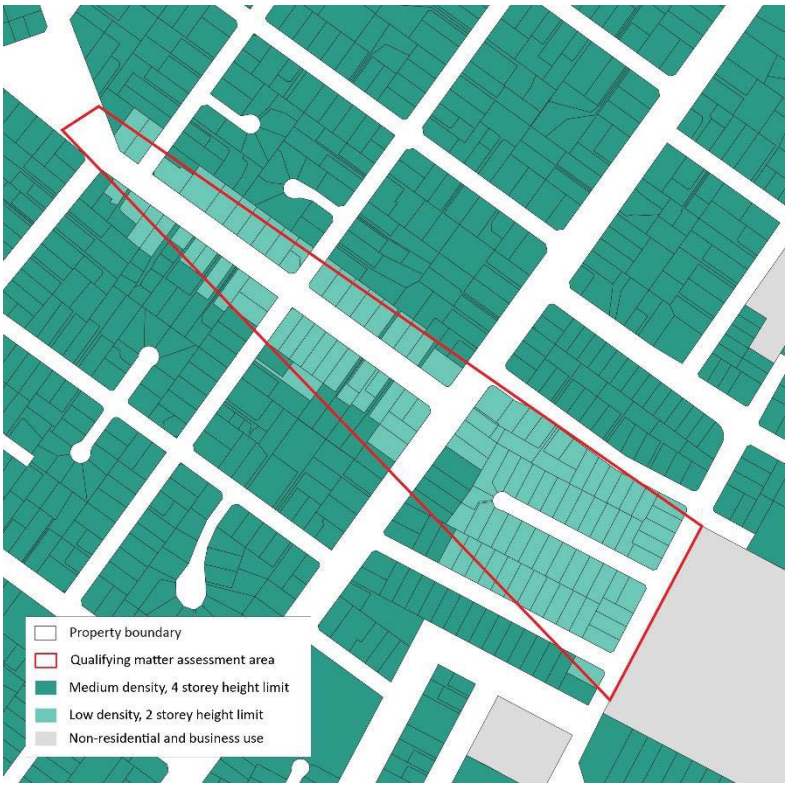
Figure 19: Step 4 – Determine and spatially identify where the qualifying matter applies

Following the site-specific assessments, determine and spatially identify:

- sites where the qualifying matter needs to apply and a lower level of intensification is required
- sites where the qualifying matter does not apply to the site and intensification as directed can be enabled.

The detailed assessment may result in local authorities wishing to remove or reduce the extent of the specific matter, for example, viewshaft or special character areas, to enable intensification as directed, if appropriate.

Figure 20: Step 5 – Enable intensification to the extent appropriate while managing the specific characteristic of the qualifying matter



Enable intensification to the extent appropriate while managing the specific characteristic of the qualifying matter.

This might mean that areas within the spatial extent covered by the qualifying matter have different levels of intensification enabled.

7 Full worked example of applying intensification provisions to determine heights or densities

This section of the guide takes you through an example to show how you need to consider the requirements of the intensification provisions. The example shows how you could apply the provisions to determine heights and densities in and around a metropolitan centre with a rapid transit stop and how this could translate to a zoning pattern.

There will be other factors beyond the ones shown in this example you may need to consider in zoning an area, including applying other provisions from the NPS-UD. This example presumes that open space and special zoning remain the same, while all other zones may be changed through applying the intensification provisions. This is reflected in the map figures.

Figure 21 below is a legend for the maps and aspects common to many of the figures in this section. Any additional features that you should note are shown in the legend for each individual map.

The example uses the standard zones set out in the national planning standards.

Figure 21: Legend/key for diagrams

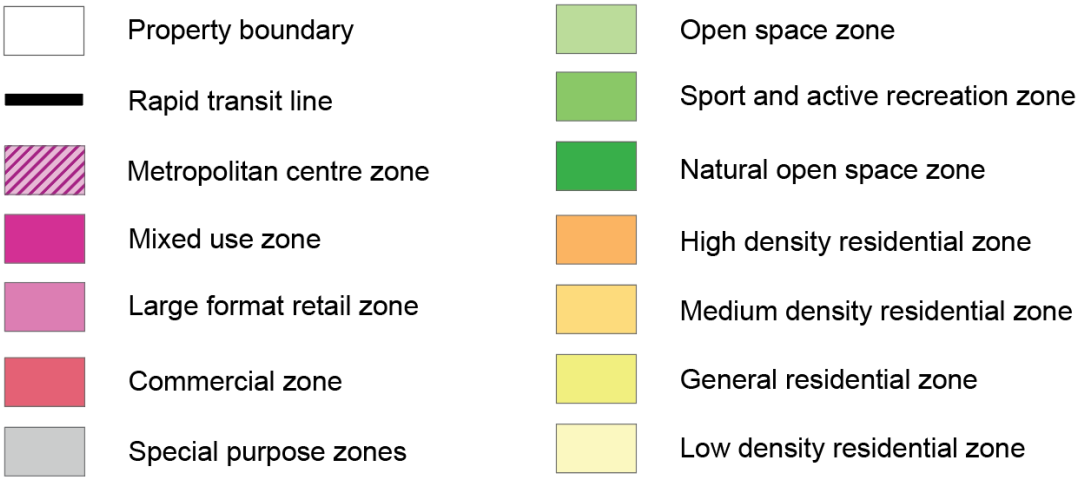
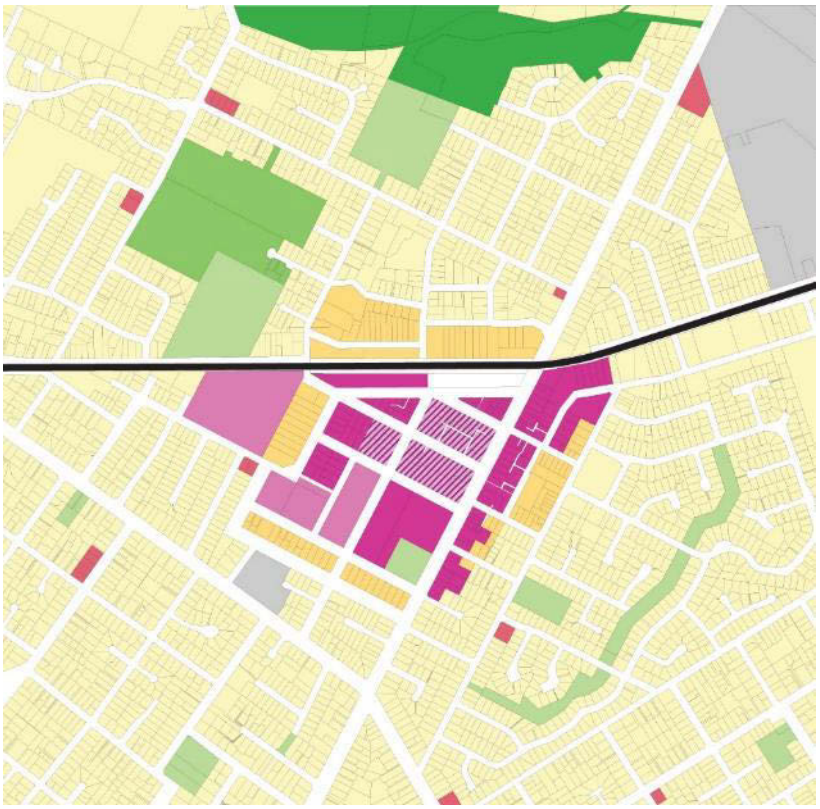


Figure 22: Current zoning pattern for a metropolitan centre that includes a rapid transit stop



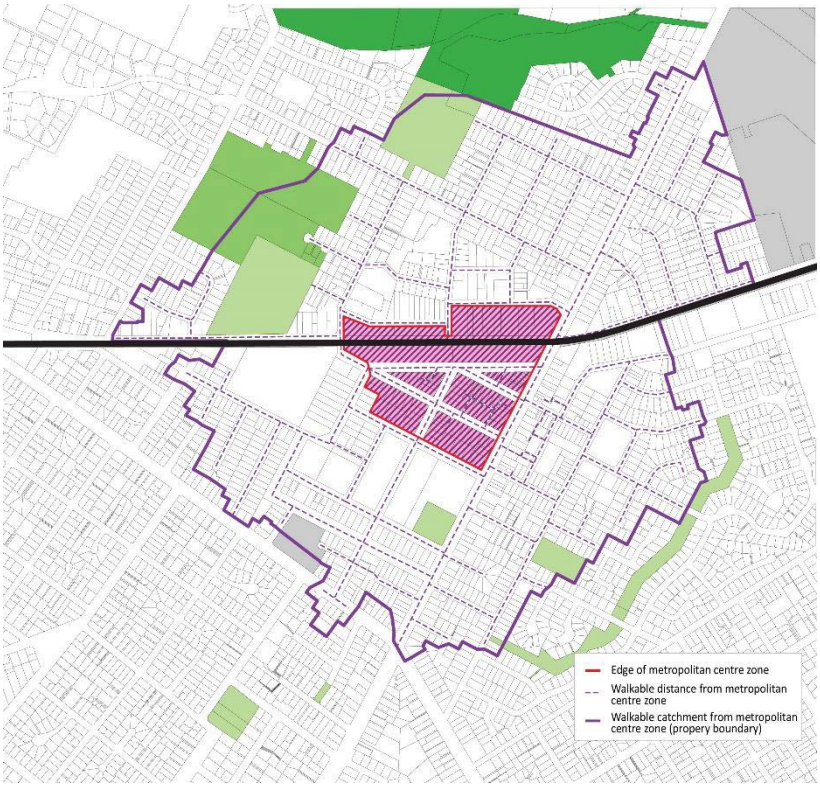
In this example, current metropolitan centre zoning is surrounded by mixed-use zoning and large format retail, which is further surrounded by areas of a high-density, residential zone. Most of the urban area in this example is currently zoned low-density, residential zone.

As part of applying the intensification provisions, the location of all of these zones would need to be reviewed.

Figure 23: Determine the extent of the metropolitan centre zone

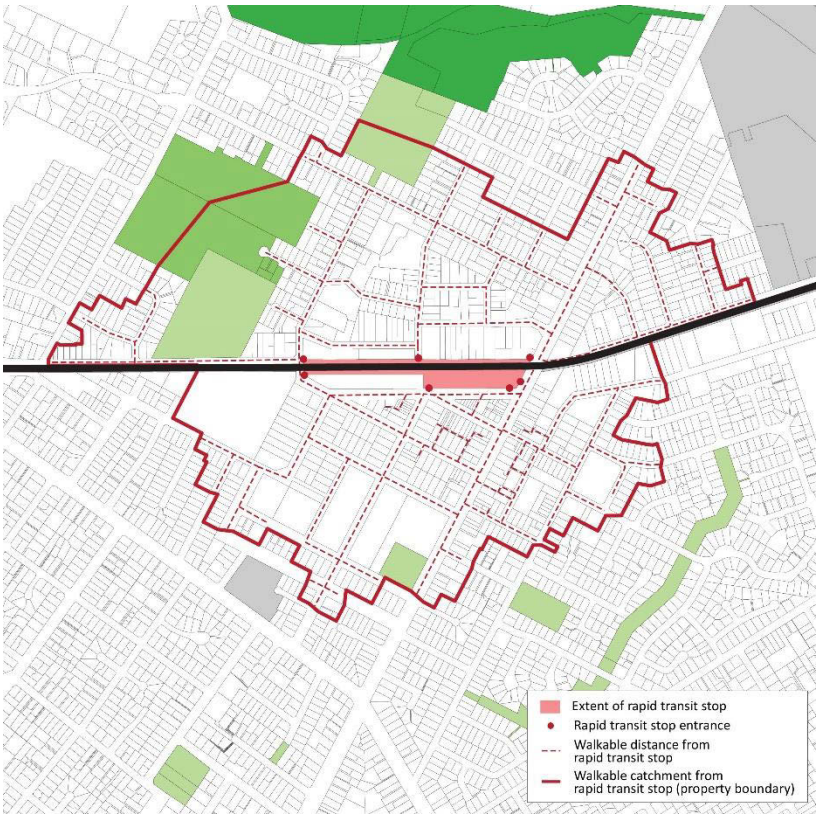
In this example, a review of the extent of the metropolitan centre zone was undertaken. It was decided it was appropriate to make the zone larger to accommodate demand.

Figure 24: Walkable catchment from edge of metropolitan centre zone



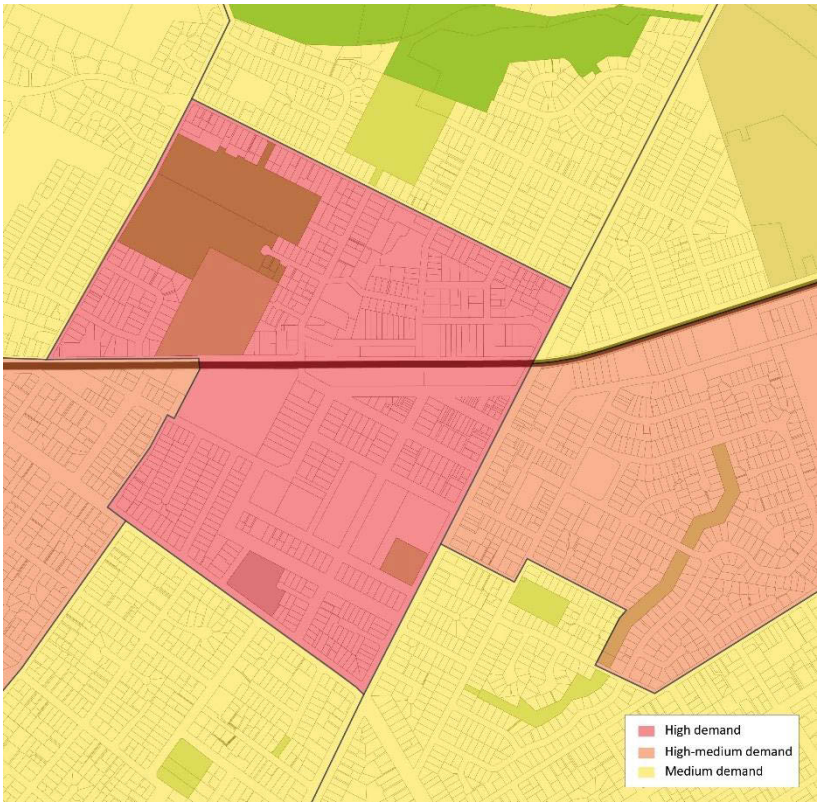
Using the extent of the metropolitan centre zone, the edge is determined. Then using GIS network analysis, the walkable catchment from the edge of the zone is determined.

Figure 25: Walkable catchment from rapid transit stop



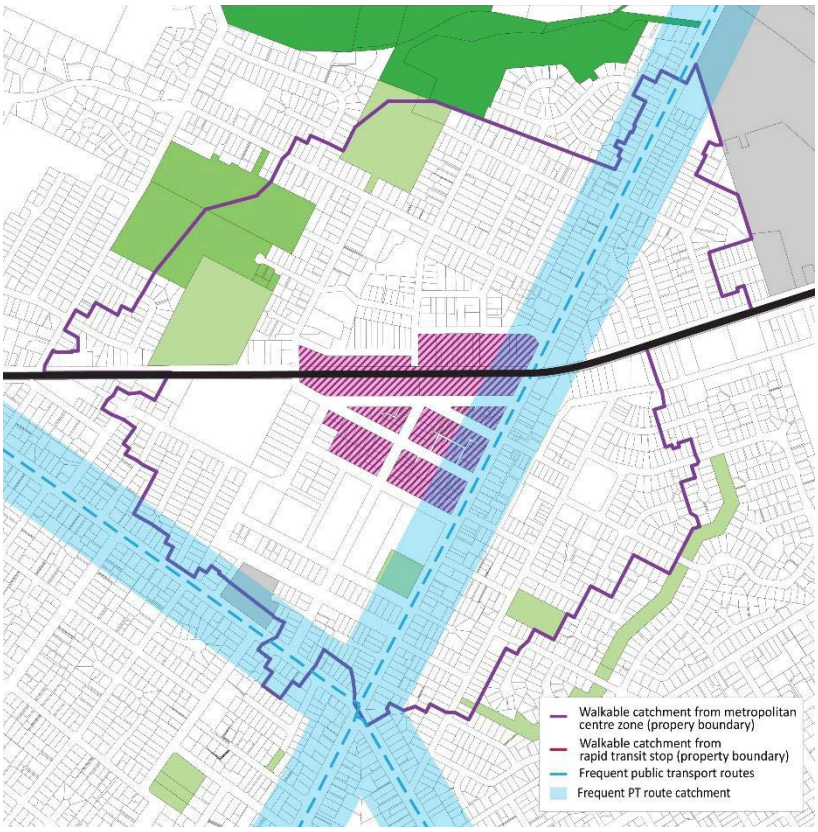
The entrances to the rapid transit stop are identified on this map. Using these as part of GIS network analysis, the walkable catchment from the rapid transit stop is determined.

Figure 26: Identifying areas of higher demand



Using information produced as part of an HBA or other evidence, identify the areas with greater demand relative to elsewhere in the urban environment.

Figure 27: Accessibility to commercial activities and community services



Information from accessibility assessments will be used to identify areas with high access to a "range of commercial activities and community services" by active or public transport. These areas are shown on the map as being the walkable catchments of the metropolitan centre (which contains a range of services).

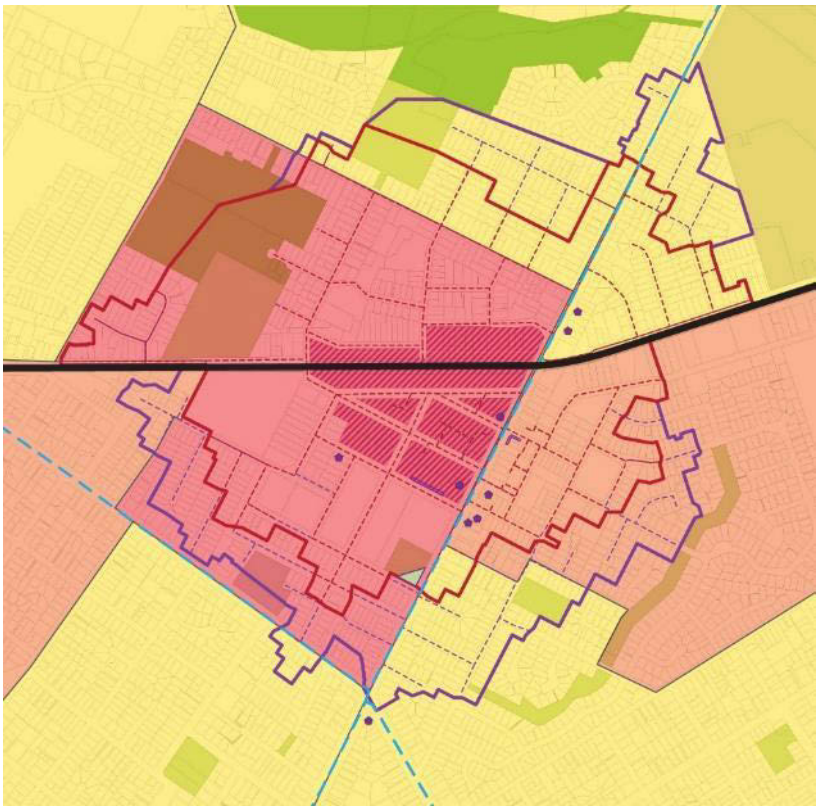
In addition to this, areas served by public transport, such as rapid transit and frequent bus routes, have also been deemed accessible.

Figure 28: Identifying any qualifying matters (heritage site and areas) that may apply

In this case, there are several heritage sites and areas that need to be noted when determining heights and densities. Each site will need to have a section 32 assessment of the relevant qualifying matter to determine what the appropriate level of intensification will be.

In this map example, the heritage items have been assessed as preventing any intensification. The provisions for heritage areas not located on open space-zoned land control building heritage features only. As intensification through increased heights is not limited by the presence of these heritage features (given that redevelopment can incorporate them), the assessment has determined this matter does not impact intensification.

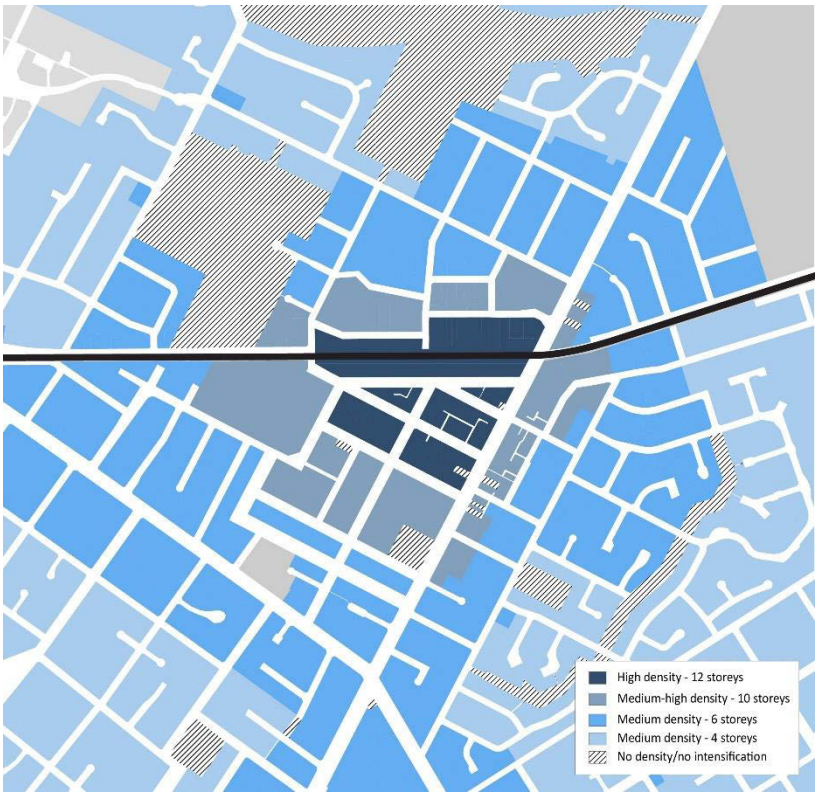
Figure 29: Map showing all factors that need to be considered to determine heights and densities for each location



While all factors that need to be considered do not need to be shown visually on a map like this, you need to demonstrate that you have considered each component.

In places where many factors requiring intensification overlap – such as high demand, high accessibility and walkable catchment of rapid transit stops – we would expect to see rules that are the most enabling and heights above the minimum required for each of the components.

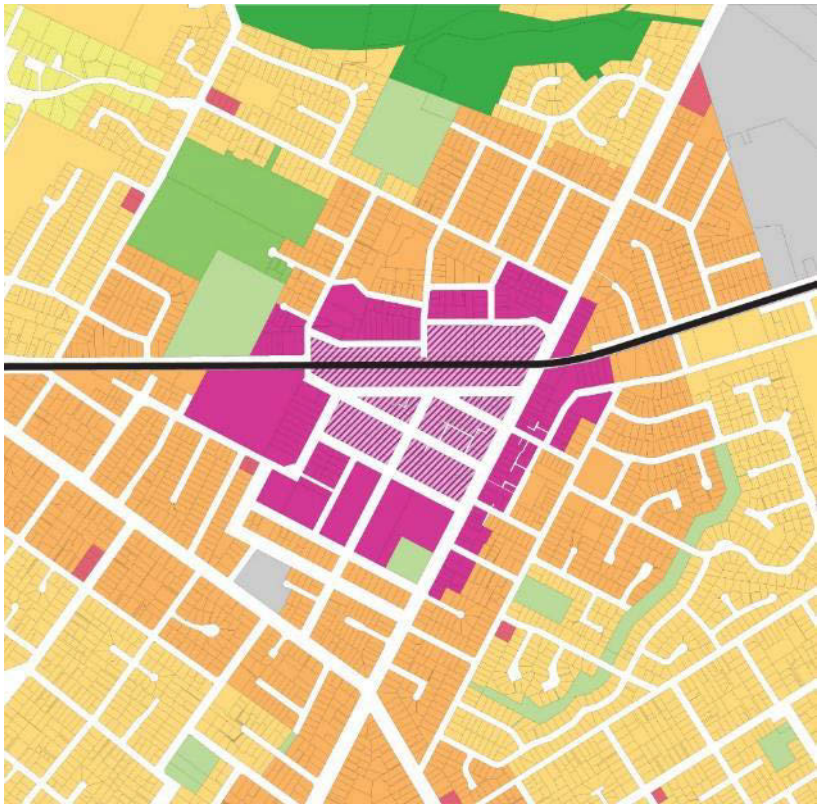
Figure 30: Map using the combined information to apply appropriate heights and densities to a location



Using the combined information to apply appropriate heights and densities to a location can be done either by calculating these first and then assigning zoning to fit, or by applying a range of appropriate zones.

In this example, you can see that qualifying matters have been applied to sites and, where relevant, no intensification is to be enabled.

Figure 31: Map showing new zoning pattern determined, reflecting the requirements of the intensification (and other) provisions



Note the application of a sensible zoning pattern, which takes into account neighbouring zones and other requirements, is to be expected and zoned outcomes will not always need to match catchments perfectly.

Note, in some cases, a change in zoning may not be necessary. The existing zoning may be suitable with a change in controls to enable intensification, or a precinct could be applied.

8 Resources

Pedestrian planning and design guide
Waka Kotahi NZTA, 2009
https://www.nzta.govt.nz/resources/pedestrian-planning-guide/

People, places, spaces urban design guide
Ministry for the Environment, 2002
https://www.mfe.govt.nz/publications/rma/people-places-spaces-mar02

Urban Design Toolkit (Third edition)
Ministry for the Environment, 2006
https://www.mfe.govt.nz/sites/default/files/urban-design-toolkit-third-edition.pdf

Roads and streets framework
Auckland Transport, 2018
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