

**Before the Independent Hearings Panel  
At Wellington City Council**

**Under** Schedule 1 of the Resource Management Act 1991

**In the matter of** Hearing submissions and further submissions on the  
Proposed Wellington City District Plan

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**Statement of supplementary planning evidence of Andrew Wharton on  
behalf of Wellington City Council**

**Date: 14 February 2023**

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**INTRODUCTION:**

1 My full name is Andrew Wharton. I am employed as a Principal Advisor in the District Planning Team at the Council.

2 I have read the respective evidence of:

**Wellington's Character Charitable Trust [233, FS82]**

- a. Mr Donald Wignall
- b. Mr Tim Helm
- c. Wellington's Character Charitable Trust statement of supplementary evidence

**Stride Investment Management Ltd [470, FS107] and Investore Property Ltd [405, FS108]**

- d. Mr Joe Jeffries
- e. Mr Mark Georgeson

**Kāinga Ora Homes and Communities [391, FS89]**

- f. Mr Nick Rae
- g. Mr Matthew Heale
- h. Mr Michael Cullen
- i. Mr Brendon Liggett

**Waka Kotahi NZ Transport Agency [370, FS103]**

- j. Mr Alastair Cribbens
- k. Mr Akhylesh Keshaboina

3 I have prepared this statement of evidence in response to the evidence submitted by the people listed above to support submissions and further submissions on the Proposed Wellington City District Plan (the Plan).

- 4 Specifically, this statement of evidence relates to the ‘rapid transit’ and ‘walkable catchment’ matters of Hearing Stream 1 – Section 42A Report – Part One, plan wide matters and Strategic Direction. The remaining matters for Stream 1 are addressed by Mr Adam McCutcheon in his Statement of Supplementary Planning Evidence.
- 5 My statement provides information and my professional opinion on specific aspects of the submitters’ evidence where I consider this may be useful for the Panel. I also mention whether the evidence has changed my professional opinions expressed in the Section 42A report for Stream 1.
- 6 At the end of this Statement, I recategorise and comment on a submission point [391.311], note a clerical error [199.4], and include a collective further submission point [FS68.60].

#### **QUALIFICATIONS, EXPERIENCE AND CODE OF CONDUCT**

- 7 Section 1.3.3 of the Stream 1 S42A Report sets out my qualifications and experience.
- 8 I confirm that I am continuing to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023, as applicable to this Independent Panel hearing.
- 9 The Environment Court’s Practice Note 2023 section 9.3(d) and (e) directs me to state if my opinion is not firm or concluded because of insufficient research or data or for any other reason, and to provide an assessment of the level of confidence, and the likelihood of any outcomes specified. I apply this below to the Johnsonville Line rapid transit topic.
- 10 The question of whether the Johnsonville Line is rapid transit is complex and not firm, because of the high-level NPS-UD definition, lack

of direction and specificity in superior documents that apply to the Plan, and the physical characteristics of the Line. This was not helped by the Wellington City Council deciding that the Johnsonville Line was rapid transit (with 10 minute walkable catchments) in its Spatial Plan, then deciding that it wasn't in the Proposed District Plan. The assessment of the Johnsonville Line as 'rapid transit' is less clear-cut than for the Kapiti and Hutt Lines. The experts listed in para 2 above with considerable experience have variously disagreed and agreed with my assessment.

- 11 Because of this, in the Stream 1 S42A report I offered the Panel two alternative recommendations to consider: HS1-Rec6 if the Panel classifies Johnsonville Rail Line as rapid transit, and HS1-Rec7 if the Panel classifies Johnsonville Rail Line as not rapid transit.

#### **SCOPE OF EVIDENCE**

##### **Submitter evidence from Donald Wignall and Tim Helm on behalf of Wellington's Character Charitable Trust [233]**

- 12 **Broader strategic direction:** While considering the detailed technical assessments of the Johnsonville Line against the NPS-UD rapid transit definition recommended by Mr Wignall and Mr Helm, I recommend that the Panel also consider the Greater Wellington Regional Council (which runs the Wellington commuter rail network) support of the Johnsonville Rail Line as a rapid transit service (Appendix E and submission 351). Also its identification in regional planning documents (refer Stream 1 S42A Report paras 149-152):
- Wellington Regional Land Transport Plan 2021
  - Wellington Regional Public Transport Plan 2021
  - Wellington Regional Growth Framework 2021

- 13 **Only NPS-UD definition:** Mr Wignall states (para 20) that no document other than the NPS-UD provides a definition of a rapid transit stop or service for the purposes of the NPS-UD. Mr Helm also states (para 32) “There exists no agreed standard or document capable of determining whether a service is a rapid transit service.”
- 14 This is correct in part but does not account for the Regional Land Transport Plan (RLTP) connection. In para 150 of the Stream 1 S42A Report, I give the opinion: “Because the NPS-UD states that the RLTP is used to identify planned services and stops, which are inherently less certain, in my opinion the RLTP identification of existing rapid transit services should also be given considerable weight when classifying rapid transit for district plan purposes. This identification also helps regional alignment across Wellington’s district plans.”
- 15 **One Network Framework:** Mr Wignall references (para 25) the One Network Framework (ONF) Classification Guidance November 2022<sup>1</sup>, noting that the guidance says that the Johnsonville Line is PT4, not PT1. I was not aware of this new guidance when writing my parts of the Stream 1 Section 42A report.
- 16 The specific Nov 2022 guidance states: “Hutt, Kapiti, Western, Eastern and Southern railway lines in Wellington and Auckland are PT1, Dedicated, because they generally provide a frequent service (averaging around 4 trains per hour across the day) on a dedicated rail corridor and have been classified as such in the NPS-UD. Johnsonville Line & Onehunga Branch Line are PT4, Secondary, because they have less than four services per hour on the corridor.”

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<sup>1</sup> <https://www.nzta.govt.nz/assets/Roads-and-Rail/onf/docs/ONF-classification-guidance-november-2022.pdf>

- 17 This guidance rationale is not correct in my view. Firstly, the NPS-UD does not classify specific transport services as rapid transit. Mr Helm’s evidence (para 31) also makes this point. Wellington City Council has consistently asked for the Minister for the Environment to list existing rapid transit services, but so far the NPS-UD definition remains vague.
- 18 Secondly, the Johnsonville Line does have four services per hour (peak services), and other services not much less frequent than the Hutt and Kapiti Lines, as summarised below. Hutt and Kapiti express trains bypass many stations, so tend to reduce peak services to around four per hour for most stations. I note that the Wellington RLTP 2021 discusses increasing service frequency and capacity for the Hutt and Kapiti Rail Lines, but not for the Johnsonville Line. However, this does not affect the comparison with the existing agreed rapid transit services.

Rail Line	Peak	Off-peak weekdays	Weekends
Hutt and Kapiti (Tawa stations) Lines	3-6 per hour (express services affect this)	3 per hour to ~7 pm, 2 per hour to ~9:45 pm, 1 per hour late night	2 per hour 8/9 am - 8/9 pm 1 per hour other times
Johnsonville Line	4 per hour	2 per hour, 1 per hour after 9:30 pm	2 per hour 8 am – 7:30 pm, 1 per hour other times

- 19 Mr Wignall states (para 26) “The section 42A officers report relies on an early draft discussion document version of the One Network Framework as stating that ‘all metro rail corridors’ are PT1 Dedicated. That discussion document has since been replaced, and the current version does not say that all metro rail corridors are PT1 Dedicated.”
- 20 In my defence, Waka Kotahi emailed me on June 2021 the document ONF Movement and Place Network Classification – Detailed Design March 2021, with all three agency logos on it (Road Efficiency Group, LGNZ, Waka Kotahi), and was labelled as “final”. Regardless, I appreciate the Panel is informed that the ONF is now updated in November 2022 along with the ONF guidance discussed above. Mr

Wignall is correct that the current version does not say that all metro corridors are PT1. The updated PT1 table row to replace Figure 4 in the Stream 1 S42A Report is attached to the end of my Statement, for the Panel's reference.

- 21 I note that Mr Georgeson's evidence for Stride Investment Management Ltd [470] and Investore Property Ltd [405] considers (paras 6.6, 6.7) that the Johnsonville Line meets the criteria of rapid transit under the National Land Transport Programme and Class PT1 under the ONF November 2022 update.
- 22 **Quick:** Mr Wignall discusses (para 36) the relative speeds of the Johnsonville and other rail lines. "Quick" is about journey times, not necessarily the speed of the vehicle<sup>2</sup>. However I agree (in para 183 of the S42A report) with his conclusion that the train journeys from the 'outer' stations: Khandallah, Raroa and Johnsonville Stations, to Wellington Station, are not "quick" journeys.
- 23 Mr Helm states (para 65) that walk-and-wait time from the true trip origin is an important part of the equation, likely adding an average 10 minutes to each JVL line trip, but not to driving. I disagree that this is a relevant aspect to the rapid transit classification. Walk-and-wait times are arbitrary, and apply to all public transport services. As shown in Figure 12 of Stream 1 s42A Report, for nearly all journeys, taking public transport is slower than driving. If 10 minutes were added to the calculation, this would remove most train services that are already accepted rapid transit services.
- 24 **High capacity:** Mr Wignall gives (para 38) the maximum seated capacity for the Johnsonville Line in peak hour as 1,176 people per hour. In my

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<sup>2</sup> Also discussed in Ministry for the Environment NPS-UD drafting: page 17 of <https://environment.govt.nz/assets/publications/OIAD-78-Signed-response.pdf>

opinion, a better capacity assessment for trains is the seated + standing capacity, as the Matangi train carriages are designed to accommodate many people standing as well as sitting. This can be seen in many peak Kapiti and Hutt train services. Appendix C to Stream 1 S42A report references the current seated + standing capacity at 1,968 people per hour. Mr Helm's evidence (para 84) also uses this metric. I acknowledge that this is lower than the 6-car trains common on the Hutt/Kapiti lines.

25 To enable 6-car trains, one of the train platforms would need extending, with other operational and infrastructure improvements.<sup>3</sup> As noted by Mr Wignall, such works to increase capacity are not planned in the RLTP or Wellington Rail Programme Business Case. In my opinion based on conversations with Metlink staff, upgrades are not needed to improve capacity because the patronage on the Line is still relatively low compared to other rail lines. Refer to S42A Report Appendix C for information on when patronage would increase to the point where upgrades would be needed.

26 **Frequency:** Mr Helm considers (paras 44-53) that a "turn up and go" frequency of 10 minutes or better is needed to be considered frequent. He also notes Auckland Transport uses a frequency of 15 minutes from 7 am – 7pm 7 days a week for its rapid transit assessment.

27 I agree that 10 minutes minimum is an ideal 'turn up and go' public transit service. I disagree that this is needed to be classified as a rapid transit service generally. The Hutt and Kapiti Lines are generally accepted as existing rapid transit services, but they have frequencies of every 20 minutes off-peak (recently improved in July 2018 from one every 30 minutes off-peak), and less frequent on weekends. During peak hours, because of express trains, the Kapiti Line stations within

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<sup>3</sup> Refer to The Wellington Character Charitable Trust's Statement of Supplementary Evidence – 9 November 2020 email from Pareesha Mehta Wilson.



Wellington City<sup>4</sup> have a service frequency of one every 20 minutes – less frequent than the Johnsonville Line’s peak frequency at 15 minutes. While the Wellington Rail Programme Business Case plans to increase the Hutt and Kapiti Line frequencies, this doesn’t affect the current comparison. The Auckland Southern Line also has 20 minute services from 9:17 am to 3:17 pm weekdays, and is currently viewed as rapid transit.

28 **Direct competition:** Mr Wignall references (para 38(d)) that the Greater Wellington Regional Council operates buses from Johnsonville to Wellington “in direct competition” with the Johnsonville Line, because of the Line’s “severe limitations”. Greater Wellington’s submission<sup>5</sup> and letter appended to the S42A report<sup>6</sup> do not take that perspective. “[The Johnsonville Line] is a key component of the regional transport network and is integrated into this network.” “The region’s rapid transit network is defined as the four heavy rail lines ... along with the high frequency bus routes forms the core of Metlink’s public transport network.” “The line continues to be improved and better integrated into the broader network and plays a key role in mode shift for journeys from the north of Wellington to and from the central city as well as other key destinations.”

29 While some commuters prefer the faster bus service from Johnsonville Station to Wellington Central instead of using the Johnsonville Line, I note that the Johnsonville Rail Station also provides convenient access

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<sup>4</sup> These stations are: Takapu Road, Redwood, Tawa and Linden Stations, and part of the walking catchment of Kenepuru Station which sits just outside Wellington City’s boundaries.

<sup>5</sup> <https://wellington.govt.nz/-/media/Your-council/plans-policies-and-bylaws/district-plan/Proposed-district-plan/Files/original-submissions/350-399/Submission-351-Greater-Wellington-Regional-Council.pdf>

<sup>6</sup> <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/01/hearing-stream-1-appendix-e-greater-wellington-regional-council-letter-johnsonville-rail-line.pdf>

for people living in the City's western suburbs to access the Johnsonville Metropolitan Centre's shops and community services. It is part of the integrated western suburbs public transport service illustrated in Stream 1 s42A report Figure 10.

- 30 **Capacity for future demand:** Mr Helm provides (paras 87-110) an assessment of Johnsonville Line's capacity for future growth, concluding that the Line's service capacity is expected to be exceeded in 5-10 years, and over-run in 20 years. My assessment of this question is in Appendix C, which concluded that the Line's capacity may need to be increased in the 2035-2050 period, depending on population growth.
- 31 Future capacity could be increased 50% by changing from a 4 car to 6 car train in peak times (s42A para 175). The train platform extension and other planning and infrastructure changes needed for this are not planned for. This is not surprising, as it's more common to get a seat on the Johnsonville Line at peak times (see S42A report Appendix C) than for Hutt and Kapiti Lines peak services, implying that capacity upgrades are prioritised for other Lines.
- 32 **Housing supply and affordability:** Mr Helm advises (paras 122 and 148) that further upzoning in the Johnsonville Line catchment will not affect housing affordability. Mr Cullen's evidence for Kāinga Ora (para 8.12) appears to contradict this, saying that enabling more housing leads an increase in affordability due to more land supply than demand and the competition for market share between housing developers. Mr Osborne from Property Economics will be presenting to the Panel, and should give his expert opinion on this question also.

### **Conclusions and recommendations on the Johnsonville Line Rapid Transit topic**

- 33 My conclusion (para 201) in the Stream 1 S42A report remains unchanged. In my opinion, viewed as a whole, in light of regional

transport planning, its function in the broader public transport network, and its potential for enabling well-functioning urban environments, the Johnsonville Line is a rapid transit service under the NPS-UD. Mr Wignall and Mr Helm’s evidence adds more data and nuance to this complex decision.

**Submitter evidence from Joe Jeffries and Mark Georgeson on behalf of Stride Investment Management Ltd [470] and Investore Property Ltd [405]**

34        **10 or 15 minute walkable catchment:** Mr Jeffries (section 7) and Mr Georgeson (para 5.6) support a High Density Residential Zone within at least a ten minute walkable catchment from the Johnsonville Metropolitan Centre Zone. They also consider that a 15 minute walkable catchment would be appropriate here. On this point, I refer to para 366 in the Stream 1 S42A report: that after walking to the MCZ, people still have to walk further to reach one or more destinations, and for Johnsonville, buses, cycling and driving become more popular and viable at longer distances.

35        The evidence from Messrs Jeffries and Georgeson does not change my conclusions and recommendations in the Stream 1 S42A Report.

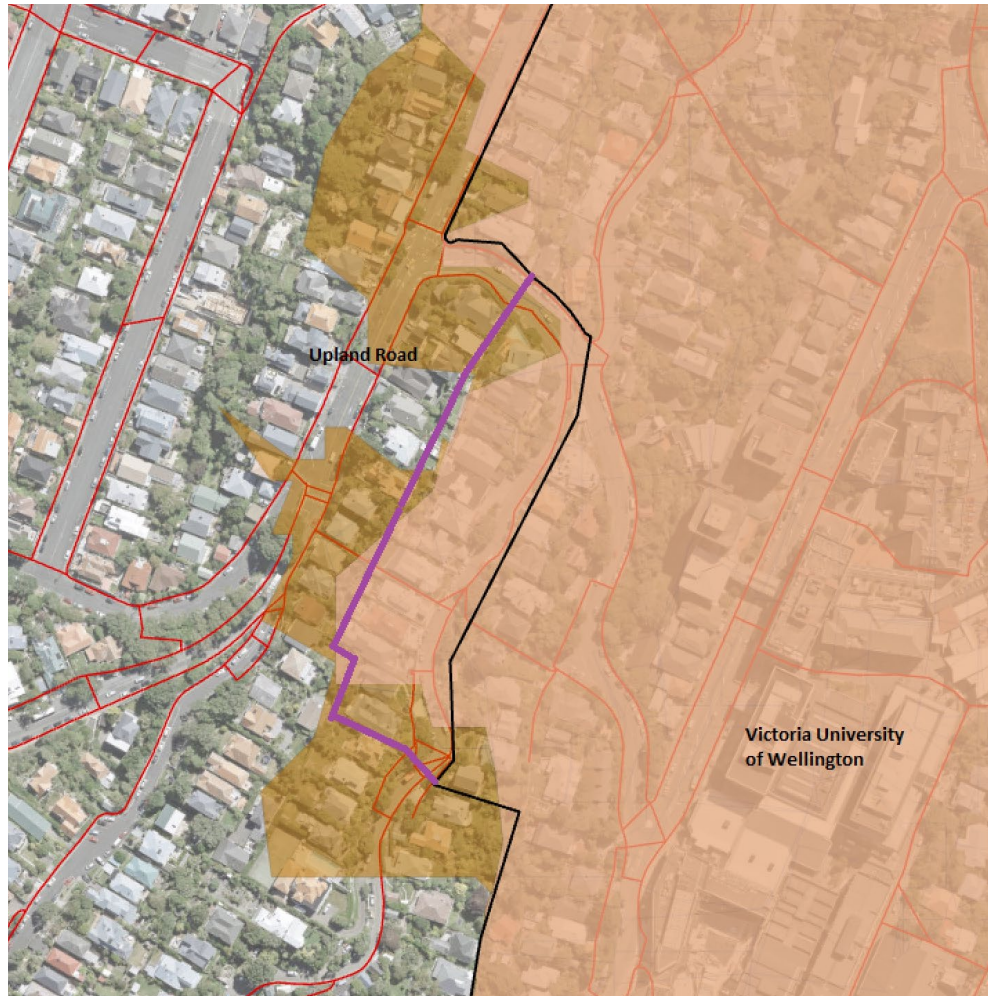
**Submitter evidence from Nick Rae, Matthew Heale, Michael Cullen and Brendon Liggett on behalf of Kāinga Ora Homes and Communities [391]**

36        **No walkable catchments for smaller centres:** Mr Rae notes (paras 9.1-9.2, 9.22) the S42A report recommends “no catchment around Town, Local or Neighbourhood Centre Zones”, and says that Policy 3(d) of the NPS-UD requires consideration of form and density adjacent to these centres, including the ability to walk to them. Mr Heale’s evidence (paras 4.23 – 4.30) expands on this.

37        In my view, the Plan already appropriately considers Policy 3(d) (see s42A report paras 379, 381). This is why some local and neighbourhood

centres have higher maximum heights and/or High Density Residential Zoning around them. This form and density variance did not take a 'walkable catchment' approach, but considered other matters such as amenity heat-mapping, commercially feasible housing typologies, neighbourhood character and opportunities, etc.

- 38     **HDRZ in Kelburn:** Mr Rae recommends (paras 9.15 – 9.19, 10.15) that the High Density Residential Zone in Kelburn should respond consistently to landform by including the land between Victoria University of Wellington and the western hill ridge behind the University, including the southern part of Upland Road and Grove Road.
- 39     I have reviewed the CCZ 15 minute walkable catchment modelling results and walkable routes, and agree in part with Mr Rae, that the properties 2–26 Central Terrace, Kelburn should be included in the High Density Residential Zone. These houses are within the 15 minute CCZ walkable catchment (median of 'towards' and 'away' times) as shown below, and continue the CCZ to the ridgeline above Victoria University.
- 40     I do not support further extending the HDRZ along all of Central Terrace, as this is outside the 15 minute walkable catchment in my S42A Report recommendation.



15 minute walkable catchment modelling around 2–26 Central Terrace, Kelburn. The light orange shading beyond the peach shading indicates the 15 minute travel time *down the hill* to the CCZ, which is further than the 15 minute *uphill* journey away from the CCZ. Black is the S42A Report's recommended extent of HDRZ. I support evidence that the HDRZ could extend to both sides of Central Terrace as bounded by the purple line.

- 41      **HDRZ around Awarua St Station:** Mr Rae notes (paras 10.27, 10.28) that the HDRZ recommended in the Stream 1 S42A report around Awarua Street Rail Station (refer Figure 32 of that report) does not account for the slopes and knolls, so that portions of HDRZ on Fox Street and Rothsay Rd are only within 5 minutes of the Rail Station because of sets of stairs and paths through bush. While I agree that people with prams, wheelchairs or low mobility would need to use the longer winding footpaths around the hills to access Awarua Station and the Ngaio neighbourhood centre, the NPS-UD and

Ministry for the Environment guidance refers to walkability, not accessibility for everyone. This is consistent with the Johnsonville Walkable Catchment Testing approach<sup>7</sup>.

- 42 **Walkable catchment definition:** Mr Heale advises (paras 4.18, 4.33) that HS1-Rec12 in the s42A report is for a definition of “walking catchment” which is different from the NPS-UD term “walkable catchment”. Also, that a definition of walkable catchment is not the best method for where higher density should apply, because the Plan does not use the term and walkable catchments will change over time as connections improve.
- 43 I agree with Mr Heale on the ‘walking catchment’ term. This was a drafting error – the term ‘walkable catchment’ should be used, as in the NPS-UD. I am comfortable with the wording of this definition recommended in S42A HS1-Rec12, as it is not exclusively directive for rules or zoning patterns. It describes what a walkable catchment means in the Plan when implementing Policy 3(c)(i-iii) – but would not be the only factor considered if the Plan is changed.
- 44 In my opinion, the HS1-Rec12 definition is also preferable to Mr Heale’s proposed amendments to HRZ-P6 and MRZ-P6 which would more strongly codify the walkable catchments and make them more directive for discretionary/non-complying resource consents and for rezonings.
- 45 **Walkable catchment around Box Hill Station:** Mr Heale considers (para 4.21) that the walkable catchment should extend to 10 minutes for all stations on the Johnsonville Line. Likewise Mr Cullen says (para 7.12) that the S42A report recommends 5 minute walkable catchments for all

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<sup>7</sup> Refer to: <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/plans-and-policies/a-to-z/spatial-plan/johnsonville-walkable-catchment-testing.pdf?la=en&hash=5D1BEA239D2B1D5FCC7B4F7C0B9EC3CBF2C212D6>

Johnsonville Line stations outside of the Johnsonville Centre. I note that HS1-Rec12 already recommends the Johnsonville Centre and Box Hill Rail Station have a 10 minute walkable catchment, due to their accessibility, amenity heat-map, and being Metropolitan Centre/close to a Local Centre respectively.

46 **Centres catchments by rail stations:** Mr Cullen advises (paras 7.3 – 7.7) that an appropriate planning approach is to create a centres catchment as a separate but complementary density inspiration to a rail station. This formed part of my Stream 1 S42A analysis on walkable catchments (section 4.4), where I recommend that rail stations near local and metropolitan centres have walkable catchments of 10 minutes, and 15 minutes for Wellington Central Station within the CCZ.

#### **Changes to Stream 1 S42A Report recommendations**

47 The evidence from Mr Rae and Mr Heale discussed above changes the following parts of my recommendations in the Stream 1 S42A Report:

- a. HS1-Rec11: In Figure 37 of the Stream 1 S42A Report, extend the HDRZ (15 minute catchment) to include the properties 2–26 Central Terrace, Kelburn.
- b. HS1-Rec12: Replace the term “Walking catchment” with “Walkable catchment”.

48 The Section 32AA Further Evaluation in the Stream 1 S42A report for HS1-Rec11 and HS1-Rec12 remain applicable to the two changes above.

49 The additional evidence from Messrs Rae, Heale, Cullen and Liggett does not change the rest of my conclusions and recommendations in the Stream 1 S42A Report.

**Submitter evidence from Alastair Cribbens and Akhylesh Keshaboina on behalf of Waka Kotahi NZ Transport Agency [370]**

50        **% walking to City Centre:** Mr Cribbens includes a table (para 6.44) that shows higher percentages of people walking from SA2 suburbs to the City Centre than in my Figure 42 in the Stream 1 S42A report. As both numbers are based on Statistics NZ datasets, I have not yet been able to discover where the difference arises. The destination areas may be different. Regardless, Mr Cribbens’ data adds support to my recommendation in S42A report para 360 and HS1-Rec11.

51        The evidence from Messrs Cribbens and Keshaboina does not change my conclusions and recommendations in the Stream 1 S42A Report.

**Recategorisation of submission point 391.311 and its further submissions**

52        The Kāinga Ora Homes and Communities submission point 391.311 is coded to be addressed with the Medium Density Residential Zone provisions.

53        391.311 Summary: *Considers that MRZ heights in walkable catchments of Local Centre Zones should be amended. Relief sought: Seeks that Medium Density Residential Zone heights be increased by up to 5 storeys within 5 min/400m walkable catchments of Local Centre Zones.*

54        This relief sought has already been discussed in Stream 1 S42A Report section 4.4.2.17, because Kāinga Ora’s point 391.40 included in that Report is effectively the same point. My recommendation for 391.311 is “Reject”, for the reasons in section 4.4.2.17.

55        Submission point 391.311 had six further submissions on it:



Submitter Name	Sub No / Point No	Sub-part / Chapter /Provision	Position	Summary of Submission	Decisions Requested
Claire Nolan, James Fraser, Margaret Franken, Bidy Bunzel, Michelle Wooland, Lee Muir	FS68.4	Residential Zones / Medium Density Residential Zone / General MRZ	Oppose	Submitter opposes Medium Density Residential Standards' heights to increase by 5 stories with 5 mins/ 400 meters of Local Centre Zone.  Considers that this is beyond the scope of National Policy Statement on Urban Development / Medium Density Residential Standards.	Disallow
Onslow Residents Community Association	FS80.13	Part 3 / Residential Zones / Medium Density Residential Zone / General MRZ	Oppose	Considers 5-storey intensification in and near Local Centre Zones is too extensive and inappropriate and goes beyond the requirements of the National Policy Statement on Urban Development and the Medium Density Residential Standards.	Disallow
Wellington's Character Charitable Trust	FS82.64	Part 3 / Residential Zones / Medium Density Residential Zone / General MRZ	Oppose	Considers that 5-storey intensification in and near Local Centre Zones is too extensive and inappropriate and goes beyond the requirements of the NPS-UD and MDRS.	Disallow
Greater Wellington Regional Council	FS84.30	Part 3 / Residential Zones / Medium Density Residential Zone / General MRZ	Oppose	Greater Wellington oppose enabling further intensified development unless there are the necessary controls to manage potential effects of water bodies and freshwater ecosystems to give effect to the NPS-FM and have regard to Proposed RPS Change 1. Greater Wellington also consider that any further intensification will not be feasible unless there is investment in associated infrastructure.	Disallow / Seeks that additional provisions are included to give effect to the NPS-FM and have regard to proposed RPS change 1
LIVE WELLington	FS96.17	Part 3 / Residential Zones / Medium Density Residential Zone / General MRZ	Oppose	Increasing medium density residential zone heights to 5 storeys within a 5 min catchment of local centre zones is opposed. This would make them high density and this is a radical change that has not been widely socialized. 5-storey intensification in and near Local Centre Zones is too extensive and inappropriate and goes beyond the requirements of the NPS-UD and MDRS	Disallow
Roland Sapsford	FS117.16	Part 3 / Residential Zones / Medium Density Residential Zone / General MRZ	Oppose	Increasing medium density residential zone heights to 5 storeys within a 5 min catchment of local centre zones is opposed. This would make them high density and this is a radical change that has not been widely socialized. 5-storey intensification in and near Local Centre Zones is too extensive and inappropriate and goes beyond the requirements of the NPS-UD and MDRS.	Disallow

56 I have read these further submissions. I partly agree with the main point raised by them that the original submission point goes beyond the NPS-UD. NPS-UD Policy 3(d) states "... district plans enable ... within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services." In my view, requiring 5 stories to be enabled around all local centre zones misses the nuance in Policy 3(d). Higher or lower building heights may be appropriate depending on the centre's level of activity and services.

57 My recommendation is to accept FS68.4, FS80.13, FS82.64, FS84.30, FS96.17 and FS117.16 for the reasons above and in section 4.4.2.17 of the Stream 1 S42A Report.

### **Clerical error**

58 Submission point 199.4 was considered in my analysis alongside point 199.3 (both essentially the same point), and both are reported in the Hearing Stream 1 Appendix B. However, I missed referencing 199.4 in the body of my S42A analysis as a clerical error. It should be added alongside 199.3 in para 127.

### **Collective further submission point FS68.60**

59 Claire Nolan, James Fraser, Margaret Franken, Bidy Bunzel, Michelle Wooland, Lee Muir [FS68] have a collective further submission point [FS68.60] not covered in the Stream 1 S42A Report, which is (in full):  
*“We oppose Sub 254 point 1- 17 by Generation Zero Opposing the entire submission. It Goes against any character extensions and preservation in Newtown and wants to reduce the walkable Catchment.”* As far it relates to rapid transit and walkable catchment topics, I retain my existing recommendations on the Generation Zero submission points, meaning I accept-in-part FS68.60.

**Date:** 14 February 2023

**Andrew Wharton**

## Updated One Network Framework Table 5 – Public Transport (Nov 2022) to replace Figure 4 in the Stream 1 S42A Report

### ONF DETAILED DESIGN TABLE 5 - PUBLIC TRANSPORT

Class	Public Transport Service Level descriptor	Strategic Significance (Role in Public Transport Network)	Indicative vehicle volume (Bi-directional)	Indicative People Movement (Bi-directional)	Description
PT1	Dedicated	Strategically significant corridors where <b>rapid transit</b> services are operated, providing a quick, frequent, reliable, and high-capacity service that operates on a permanent route (road, rail, or sea lane) that is dedicated to public transport or largely separated from other traffic.	≥ 4 services per hour	≥1000 per day	Dedicated or largely separated public transport corridors provide for the fast and efficient movement of people by rapid transit. They only service public transport (except rail lines that can also provide a goods movement function under the freight mode).
PT2	Spine	Strategically significant corridors where many frequent services operate and <b>many different PT services merge together to create very high frequencies and overall passenger movement</b> . Any deficiencies on these corridors affect multiple services and large parts of an urban area.	≥ 20 services per hour	1000 to 10000+ per day	Spine corridors are where many public transport services operate on the same corridor, usually within city centres or near major transport interchanges as PT services converge. Much of the street space can be dedicated to public transport infrastructure, including significant space that could be utilised for bus stops.
PT3	Primary	Strategic corridors where <b>frequent public transport services operate, providing regular</b> services across most of the day, seven days a week.	≥ 4 services per hour	≥ 500 per day	Primary public transport corridors occur on the parts of the network where frequent service can be expected. This could be for part of route where the collection of services operating results in a better than 15-minute headway frequency of that part of the route. These corridors are more likely to be on major arterial roads.
PT4	Secondary	Corridors where <b>PT services operate at most times of day</b> , but less frequently. The main focus of PT services using these corridors is to provide basic access and coverage.	< 4 services per hour	100 to 1000 per day	Secondary public transport corridors occur in the parts of the network providing local access and coverage, but at reduced schedules. Routes typically traverse local streets and minor arterial roads
PT5	Targeted	Corridors where services only operate at certain times of the day (e.g., peak only) or for specific trip purposes (e.g., school buses only).	N/A	Variable	These services provide a basic level of access to public transport, but on a much-reduced schedule, typically only once a day return, such as school bus services, and long-distance commuter services, or at peak times only.