



OIAD-76

9(2)(a)

Dear 9(2)(a)

Thank you for your email of 04 July 2021 requesting the following under the Official Information Act 1982 (the Act):

*I request:*

*Any advice, papers, or email correspondence prepared by officials on the topic of whether or not bus routes fall under the definition of rapid transit service in s1.4 of the NPS-UD.*

*Note that I write this in the context of former Minister Twyford confirming that s1.4 Interpretation of 'Rapid transit service' is intended to include high frequency bus services on major arterials alongside grade separated rapid transit like rail and the Northern Busway (reference here: <https://twitter.com/PhilTwyford/status/1410493165220495363?s=19>).*

*Please note that I'm essentially looking for anything that confirms or denies Minister Twyford's clarification so if there are documents where only part of the document fits within this narrow scope, please feel free to redact/withhold anything unrelated to this request to reduce your workload and avoid having to apply s9 tests to unrelated content.*

The Ministry for the Environment (the Ministry) has identified publicly available documents which contain policy, definitions and guidance for how rapid transit service should be interpreted. These are as below:

- The National Policy Statement on Urban Development (NPS-UD) which is available here <https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020/>.
  - The NPS-UD refers to rapid transit service in policy 3 which directs councils to intensify in particular areas and includes a definition of rapid transit service in section 1.4.
- Guidance on implementing the intensification requirements of the NPS UD: this is available here. <https://environment.govt.nz/assets/Publications/Files/Understanding-and-implementing-intensification-provisions-for-NPS-UD.pdf>
  - Section 5.51 of the intensification guidance discusses the interpretation of rapid transit service.

The Ministry has identified eight documents that further discuss the development of the policy that relates to intensification around rapid transit service which are in scope of your request, as detailed in the document schedule below.

Some information within these documents has been withheld as being out scope and under section 9(2)(a) of the Act, to protect the privacy of natural persons.

In terms of section 9(1) of the Act, I am satisfied that, in the circumstances, the withholding of this information is not outweighed by other considerations that render it desirable to make the information available in the public interest.

You have the right to seek an investigation and review by the Office of the Ombudsman of my decision to withhold information relating to this request, in accordance with section 28(3) of the Act. The relevant details can be found on their website at: [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz).

Please note that due to the public interest in our work the Ministry for the Environment publishes responses to requests for official information on our [OIA responses page](#) shortly after the response has been sent. If you have any queries about this, please feel free to contact our Ministerial Services team: [ministerials@mfe.govt.nz](mailto:ministerials@mfe.govt.nz).

Yours sincerely



Lesley Baddon  
**Director - Urban and Infrastructure Policy**

### Document schedule

Document no.	Document date	Content	Decisions	OIA sections applied
1	12 December 2019	Email: Feedback on NPS-UD directive intensification policy – post TAP	Release in part	9(2)(a) Out of scope
2	12 December 2019	Email: First cut a directive intensification policy	Release in part	Out of scope
3	30 January 2020	Email: NPS on Urban Development – Initial MoT feedback	Release in part	9(2)(a)
4	31 March 2020	Email – NPS-UD Definitions	Release in part	9(2)(a)
5	2 April 2020	Email: FW: NPS-UD Definitions	Release in part	9(2)(a)
6	4 May 2020	Email: RE: NPS-UD Rapid Transit Definition	Release in part	9(2)(a)
7	4 May 2020	Email: FW: NPS-UD Rapid Transit Definition	Release in part	9(2)(a)

8	N/A	Appendix H: Household and Employment Densities Required in High Density Centres and Intensive Corridors to Support the Public Transport System	Release in full	
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Released under the provision of  
the Official Information Act 1982

**Aroma Kim**

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**From:** s 9(2)(a) s 9(2)(a)  
**Sent:** Thursday, 12 December 2019 4:05 pm  
**To:** Stephanie Gard'ner  
**Cc:** Gareth Fairweather  
**Subject:** RE: Feedback on NPS-UD directive Intensification policy - post TAP

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**From:** s 9(2)(a) <s 9(2)(a)>  
**Sent:** Thursday, 12 December 2019 3:06 PM  
**To:** Stephanie Gard'ner <Stephanie.Gard'ner@mfe.govt.nz>  
**Cc:** s 9(2)(a) <s 9(2)(a)>  
**Subject:** RE: Feedback on NPS-UD directive Intensification policy - post TAP

Hi Stephanie

Thanks for sending this through. A couple of thoughts you can choose to consider or not... Also please excuse what may be simple questions or questions around policy behind this.

- I like the mix of descriptive / prescriptive if we can get the words right – seems a logical conclusion.
- Out of Scope

[Large redacted area covering the main body of the email]

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**From:** Peter Bevan  
**Sent:** Thursday, 12 December 2019 3:22 PM  
**To:** Stephanie Gard'ner <Stephanie.Gard'ner@mfe.govt.nz>  
**Cc:** Catherine Dyhrberg <Catherine.Dyhrberg@mfe.govt.nz>  
**Subject:** RE: First cut a directive intensification policy

Hi both,

Apologies in advance for stream of consciousness.

I've found the definition of "rapid transit" in the GPS on Land Transport (page 59, link here: <https://www.transport.govt.nz/assets/Uploads/Our-Work/Documents/c6b0fea45a/Government-Policy-Statement-on-land-transport-2018.pdf>). The GPS also defines "public transport", but has no equivalent definition of "frequent public transport".

<b>Public transport</b>	Passenger transport infrastructure and services contracted by local and central government. Interregional passenger transport by means of a rail vehicle.
<b>Rapid transit</b>	Public transport capable of moving a large number of people, for example light rail and dedicated bus routes. Common characteristics of rapid transit include frequent services, fast loading and unloading capability, and largely dedicated or exclusive right-of-way routes.

As per our discussion on Monday, for 'scaled' approach for directive intensification, we need definitions of :

- **Frequent public transport** (being something greater than regular public transport); and
- **Rapid [public] transit** (being even more frequent / higher capacity than frequent public transport).

Unfortunately, I don't think we can use the GPS's definition of "rapid transit" definition verbatim in the NPS-UD, particularly because it refers to "frequent services" (which seems to overlap with frequent public transport).

So... I think we might need to craft our own definitions.

In terms of defining "rapid [public] transit", I think we could build a definitions off the reference in the GPS to "capable of moving a large number of people" and "largely dedicated or exclusive right-of-way routes". So, for example, it would capture Auckland's Northern Busway (which mostly has its own lane), but not the frequent buses through Wellington. We'd also need to think carefully about how this would apply to bus routes that have a dedicated bus lane in peak hours, but where private vehicles are allowed to use or park in the lanes outside of peak hours (e.g. the bus lanes on Dominion Road). If we're not bound by the GPS, I also prefer your wording of "rapid **public** transit", as opposed to simply "rapid transit".

I'm struggling to think of a robust definition of "frequent public transport", to distinguish it from regular (infrequent) public transport. It would be easy to *draft* a definition based on a set frequency of service (e.g. trips at least every [10] mins between the hours of XX and XX (morning peak), and YY and YY (evening peak). But I'm not sure what those numbers would be. Do you have any thoughts?

As I see it, options are as follows:

1. Used scaled approach:
  - a. Define "frequent public transport" and "rapid public transport" in a prescriptive way (e.g. fixed number of services per hour, rapid transit involves largely dedicated or exclusive right-of-way)
  - b. Use the terms "frequent public transport" and "rapid public transport", but don't define them in a prescriptive way. Rather, allow councils to interpret the words at face value.
  - c. Something in between (a) and (c) – Definition that gives guidance, but leaves some flex for councils)

- Are we not using 'frequent' as a measure anymore in relation to PT? Can use NZTA definition: [https://www.transport.govt.nz/assets/Import/Uploads/Our-Work/Documents/Final-GPS-2018-measures\\_10-Sept-2019.pdf](https://www.transport.govt.nz/assets/Import/Uploads/Our-Work/Documents/Final-GPS-2018-measures_10-Sept-2019.pdf) We thought that because frequency can change more readily than 'rapid' transit it could result in uncertainty about zoning decisions. Frequency would also rule out some of the MUCs that don't have very good public transit networks yet (but could have). Keen to talk more on this though.
- Just checking that these rules would apply to all development, whether green/brown/grey? Correct – would apply anywhere that met the criteria.

Keep up the good work!

s 9(2)(a)

Ministry of Transport | Te Manatū Waka

M s 9(2)(a) | E s 9 | [www.transport.govt.nz](http://www.transport.govt.nz)

Ground Floor, 3 Queens Wharf, Wellington 6011.

*Enabling New Zealanders to flourish*

Out of Scope

9(2)  
(a)

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## Aroma Kim

---

**From:** Stephanie Gard'ner  
**Sent:** Friday, 13 December 2019 11:55 am  
**To:** Peter Bevan  
**Cc:** Catherine Dyhrberg; Matt Lindenberg (Matt.Lindenberg@beca.com); Jym Clark  
**Subject:** RE: First cut a directive intensification policy

Out of Scope

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[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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[Redacted]

### MUCs only

**Policy D1 [Directive intensification 1 – city centres]:** Except as provided for in Policy D4, district plans shall not set height limits in city centre zones.

Gone bold here – not sure if this will fly. I will have a chat with Geoff about this – need to work through the implications. Ok for now.

**Policy D2 [Directive intensification 2 – directing high density]:** Except as provided for in Policy D4, territorial authorities must ensure that the combined effect of objectives, policies, rules and spatial layers in district plans enable:

- (1) ~~higher density~~ urban form of at least ~~four~~ six storeys:
  - (a) in metropolitan centre, town centres, and [local centre zones]; and
  - (b) within at least a walkable catchment of:
    - (i) rapid public transit stops (existing or [under construction/funded]); and
    - (ii) the edge of city centre or metropolitan centre zones; and
- (2) if not covered by (1), ~~high density~~ urban form of at least three storeys:
  - (a) within at least a walkable catchment of:
    - (i) [public transport nodes] (existing or [under construction/funded]); and



(ii) the edge of town centre and local centre zones.

Notes:

- Still working through definitions of rapid public transit and public transport nodes. I like your wording re public transport networks and nodes Steph, but haven't progressed any further, so have just used [public transport nodes] as a placeholder for now.
- Suggesting "high density urban form" rather than "high density activities", to tie-in with Panel feedback from CK. I don't *think* we need to define "high density urban form", given the reference to three or four storeys. I think that if we can avoid using (and therefore defining) 'high density' that would be useful. Eg, could we refer to *higher* density urban form? Or even take out all together and just talk about an urban form of at least X storeys?
- Suggesting "at least four storeys" for the highest level density, rather than "generally four to six storeys", to avoid arguments that six storeys is the highest height that the NPS-UD anticipates. I've thought some more on the 4 -6 stuff and want to run with 6 at the moment.
- Made a distinction between height *in* centre zones and *within a walkable catchment of the edge of* centres zones – need to think through if all are in the right place. Think this is right.

Out of Scope

Out of Scope

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Out of Scope

[Redacted content]

**From:** Stephanie Gard'ner <[Stephanie.Gard'ner@mfe.govt.nz](mailto:Stephanie.Gard'ner@mfe.govt.nz)>  
**Sent:** Thursday, 12 December 2019 3:41 PM  
**To:** Peter Bevan <[Peter.Bevan@mfe.govt.nz](mailto:Peter.Bevan@mfe.govt.nz)>  
**Cc:** Catherine Dyhrberg <[Catherine.Dyhrberg@mfe.govt.nz](mailto:Catherine.Dyhrberg@mfe.govt.nz)>  
**Subject:** RE: First cut a directive intensification policy

Hi Pete,

Thanks for sending through. I agree with your thoughts on rapid transit. I think it would be better to not use frequent public transport at all – the frequency can change quite quickly and could create uncertainty for plan changes. I think the lesser option would possibly be around ‘public transport networks or nodes, particularly where serviced on a frequent basis’ or something similar. Keen for your thoughts on that though too (as it makes it harder to understand where this would apply).

Steph

**From:** Peter Bevan <[Peter.Bevan@mfe.govt.nz](mailto:Peter.Bevan@mfe.govt.nz)>  
**Sent:** Thursday, 12 December 2019 3:23 PM  
**To:** Stephanie Gard'ner <[Stephanie.Gard'ner@mfe.govt.nz](mailto:Stephanie.Gard'ner@mfe.govt.nz)>  
**Subject:** RE: First cut a directive intensification policy

PS. I see this sort of thing as very much a ‘policy’ issue. It’s certainly not something that I would be discussing with Catherine Yates at our drafting meeting on Monday...



**Aroma Kim**

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**From:** s 9(2)(a) <s 9(2)(a)>  
**Sent:** Thursday, 30 January 2020 10:39 am  
**To:** Stephanie Gard'ner; s 9(2)(a) s 9(2)(a);  
s 9(2)(a)  
**Cc:** Kaitlyn Stringer  
**Subject:** RE: NPS-UD workshop  
**Attachments:** NPS on Urban Development - Initial MoT feedback.docx  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Kia ora Stephanie

It was good to meet you and the NZTA team in Auckland on Tuesday. As discussed, I've attached some initial feedback from MoT on the draft NPS, which I had put together before our meeting.

Based on Tuesday's discussion, we're also preparing some further high-level feedback with NZTA on some key areas that need to be resolved in the NPS (including the wording of Policy 3.5, and the need to focus on intensification instead of just building heights).

We'll aim to provide that feedback to you and David Shamy before we receive the draft briefing to Ministers next week.

Cheers,

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Te Manatū Waka – Ministry of Transport  
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**Aroma Kim**

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Nick Potter

s 9(2)(a)

Te Manatū Waka – Ministry of Transport

Es 9(2)(a)

TS 9(2)(a)

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**Aroma Kim**

**From:** Peter Bevan  
**Sent:** Thursday, 2 April 2020 11:23 am  
**To:** Jym Clark  
**Subject:** FW: NPS-UD Definitions  
**Attachments:** NZTA Feedback on NPS-UD summary 30 March 2020.docx

**From:** s 9(2)(a)  
**Sent:** Thursday, 2 April 2020 11:06 AM  
**To:** Peter Bevan <Peter.Bevan@mfe.govt.nz>  
**Subject:** FW: NPS-UD Definitions

**MFE CYBER SECURITY WARNING**

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Hi – will discuss this at 11.30.

s 9(2)(a)

**B&A**

B&A  
Urban & Environmental

s 9(2)(a)

**From:** s 9(2)(a) <s 9(2)(a)>  
**Sent:** Tuesday, 31 March 2020 9:31 AM  
**To:** s 9(2)(a) <BriarB@barker.co.nz>  
**Cc:** s 9(2)(a)  
**Subject:** NPS-UD Definitions

Kia ora s 9(2)(a) and s 9(2)(a)

As requested, here are some proposed definitions for the NPS-UD (I've also cleared these with NZTA):

- **Rapid transit:** a quick, frequent, reliable and high-capacity public transport service that operates on a dedicated route (road or rail) that is largely separated from other traffic. Examples include rail, light rail, and bus rapid transit systems. {Note: the examples at the end are optional but would remove any doubt that light rail is considered rapid transit}
- **Rapid transit stop:** a place where people can board and alight a rapid transit vehicle. {Alternatively, 'enter' or 'exit' can use used in place of board and alight}.
- **Planned active transport route:**  
This will need some discussion. Active transport includes walking and cycling - so a planned active

transport route would include simply a footpath (which doesn't really signify much). Does the NPS-UD need to use the term planned active transport route? If we need some definitions, the NPS-UD should really encourage planning for shared paths and cycle paths. Otherwise someone could just put a footpath in and call it an active transport route. I've suggested using this wording from the [Accessible Streets](#) draft, with some minor tweaks given these proposed changes haven't been implemented yet:

- **shared paths:** designed to be used by pedestrians, people using mobility devices, cyclists, and people using transport devices (e.g. scooters and skateboards)
- **cycle paths:** a part of the road that is physically separated from motor traffic and intended for use by cyclists and other permitted users.

Hopefully that's useful.

I've also attached a summary of NZTA's key feedback on the previous draft NPS-UD. We managed to clear some of their key concerns during a meeting between MoT and NZTA last week. We've also come up with some suggested refinements to a few parts of the NPS-UD, which we believe would clarify the intent of the NPS-UD. These would be straightforward to include. These comments are for discussion with a meeting including all of us and NZTA later this week - but we can also touch on this today if you'd like to discuss anything in advance of that meeting.

Looking forward to chatting later today,

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E s 9(2)(a) | T s 9(2)(a)

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**MINISTRY OF TRANSPORT**

**Wellington (Head Office)** | Ground Floor, 3 Queens Wharf | PO Box 3175 | Wellington 6011 | NEW ZEALAND | Tel: +64 4 439 9000 |

**Auckland** | NZ Government Auckland Policy Office | 45 Queen Street | PO Box 106238 | Auckland City | Auckland 1143 | NEW ZEALAND | Tel: +64 4 439 9000 |

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**Aroma Kim**

**From:** s 9(2)(a)  
**Sent:** Monday, 4 May 2020 2:47 pm  
**To:** Peter Bevan; Catherine Yates; s 9(2)(a) s 9(2)(a)  
 s 9(2)(a)  
**Cc:** Jym Clark  
**Subject:** RE: NPS-UD Rapid Transit Definition

Hi all

The examples from the GPS definition ("*Examples include rail, light rail, and bus rapid transit systems*") are useful, and I recommend these are retained.

The issue with the definition below is understanding when a bus service becomes 'rapid' – does just a bus route with some shoulder lanes qualify? The example of a *bus rapid transit system(s)* helps to clarify this is something offering a higher level of service - such as a separated busway, prioritisation measures, stations, higher capacity vehicles etc.

s 9(2)(a)

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Places and Partnerships  
Place-based Policy and Programmes

Ministry of Housing and Urban Development  
s 9(2)(a) | [www.hud.govt.nz](http://www.hud.govt.nz)




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**From:** Peter Bevan <Peter.Bevan@mfe.govt.nz>  
**Sent:** Monday, 4 May 2020 2:29 pm  
**To:** Catherine Yates <Catherine.Yates@mfe.govt.nz>; s 9(2)(a)  
 s 9(2)(a) >; s 9(2)(a)  
**Cc:** Jym Clark <Jym.Clark@mfe.govt.nz>  
**Subject:** FW: NPS-UD Rapid Transit Definition

Hi all,

Copying Catherine Yates, our drafter, into this chain. Catherine – do you have any concerns with this minor change to the definition of "rapid transit service"? Edits shown in red from the current version, v11.2.

**rapid transit service** means a ~~fast~~ **quick**, frequent, reliable and high-capacity public transport service that operates on a permanent route (road or rail) that is largely separated from other traffic

Context: The team are working to align the definition of "rapid transit service" between the NPS-UD and next GPS on Land Transport. Nick Potter from MOT considers that our wording would work in the GPS too, with a minor

change, for the reason given below. From my perspective the words "quick" and "fast" are synonyms, so I don't see any issue with the change – and is certainly worth it to get alignment between the two docs.

Thanks  
Peter

**Peter Bevan – Senior Analyst, Urban and Infrastructure, Wellington**  
Ministry for the Environment – Manatū Mō Te Taiao  
23 Kate Sheppard Place, Thorndon, Wellington 6143  
Mobile: 022 015 3285 Email: [peter.bevan@mfe.govt.nz](mailto:peter.bevan@mfe.govt.nz)



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the most liveable place in the world*  
Aotearoa - he whenua mana kura mō te tangata



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Cc: Peter Bevan <[Peter.Bevan@mfe.govt.nz](mailto:Peter.Bevan@mfe.govt.nz)>  
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Hi all,

Please see response from s 9(2)(a) below about Rapid Transit definition.

Any thoughts before I go back to him?

s 9(2)(a)

**B&A**

B&A  
Urban & Environmental

s 9(2)(a)

From: s 9(2)(a) <s 9(2)(a)>  
Sent: Monday, 4 May 2020 12:56 PM  
To: s 9(2)(a)  
Subject: Re: NPS-UD Rapid Transit Definition



Hi Briar

Thanks for checking. I'm across the GPS2021 definitions too (nothing has been finalised) so we can easily align these.

This would be the preferred definition for both documents:

*A quick, frequent, reliable and high-capacity public transport service that operates on a permanent route (road or rail) that is largely separated from other traffic.*

I've just changed the word 'fast' to 'quick' as the important factor for commuters is journey times ('a quick trip'), not necessarily the speed of the vehicle (e.g. a train/bus might go relatively slowly through some parts of town but still be a lot quicker than cars as it's not delayed by traffic).

If you're OK with that definition I'll make sure the GPS team uses the same wording.

Cheers,

s  
9(2)

s 9(2)(a)

s 9(2)(a)

Te Manatū Waka – Ministry of Transport  
E s 9(2)(a) | T s 9(2)(a)

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**Aroma Kim**

**From:** s 9(2)(a)  
**Sent:** Monday, 4 May 2020 2:47 pm  
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Ministry for the Environment – Manatū Mō Te Taiao  
23 Kate Sheppard Place, Thorndon, Wellington 6143  
Mobile: 022 015 3285 Email: [peter.bevan@mfe.govt.nz](mailto:peter.bevan@mfe.govt.nz)



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the most liveable place in the world*  
Aotearoa - he whenua mana kura mō te tangata



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Sent: Monday, 4 May 2020 1:39 PM  
To: [Redacted]  
Cc: Peter Bevan <[Peter.Bevan@mfe.govt.nz](mailto:Peter.Bevan@mfe.govt.nz)>  
Subject: FW: NPS-UD Rapid Transit Definition

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s  
9(2)

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Te Manatū Waka – Ministry of Transport  
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## Appendix H

### Household and Employment Densities Required in High Density Centres and Intensive Corridors to Support the Public Transport System.

#### PROPOSED LEVEL OF PUBLIC TRANSPORT PROVISION

CENTRE TYPE	RAPID TRANSIT	QUALITY TRANSIT NETWORK	LOCAL CONNECTOR NETWORK
SUB REGIONAL CENTRE	<i>Residential Density (Gross)</i> 60 Dwellings Per Ha. <i>Employment Density (Gross)</i> 300 Employees Per Ha.	<i>Residential Density (Gross)</i> 40 Dwellings Per Ha. <i>Employment Density (Gross)</i> 200 Employees Per Ha.	NA  NA
INTENSIVE CORRIDOR	<i>Residential Density (Gross)</i> 40 Dwellings Per Ha. <i>Employment Density (Gross)</i> 200 Employees Per Ha.	<i>Residential Density (Gross)</i> 30 Dwellings Per Ha. <i>Employment Density (Gross)</i> 150 Employees Per Ha.	NA  NA
TOWN CENTRE	<i>Residential Density (Gross)</i> 40 Dwellings Per Ha. <i>Employment Density (Gross)</i> 200 Employees Per Ha	<i>Residential Density (Gross)</i> 30 Dwellings Per Ha. <i>Employment Density (Gross)</i> 150 Employees Per Ha	<i>Residential Density (Gross)</i> 20 Dwellings Per Ha. <i>Employment Density (Gross)</i> 50-100 Employees Per Ha

#### Notes:

- For residential development the above densities are averages over the catchment area of the High Density Centre or Intensive Corridor.
- For employment densities the above averages relate to the zoned employment areas within the High Density Centre or Intensive Corridor. The employment figures relate to all employment, full-time and part-time.
- High Density Centres and Intensive Corridors should focus on rail or bus stops and/or a commercial / community centre.
- Depending on the nature of the centre increased densities should in general occur within an 800m radius catchment (or a 10 minute walk) of the Sub Regional Centre focus, and a 400 to 800 meter radius catchment (or a 5-10 minute walk) of the Town Centre focus. In general those Town Centres with a rapid transit service should have a larger catchment than those without.
- Residential and employment densities should be higher closer to the transit stop and/or commercial centre and graduate towards lower densities at the edge of the higher density centre or corridor. For example, within a Sub Regional Centre the density within 200 meters of the Sub Regional Centre focus could be twice the average (i.e. 120 dwellings per hectare), from 200 to 400 meters 1.5 times the average (i.e. 90 dwelling units per hectare) and from 400 – 800 meters 0.8 times the average (i.e. 48 dwellings per hectare).
- The densities listed are not mandatory for all centres and corridors. In some cases these densities will be difficult to achieve. However, in other cases these densities could be easily exceeded.

## NPS on Urban Development – MoT feedback 27 Jan

### Definitions needed (note we are currently confirming these with NZTA)

- **Active transport:** Forms of transport that involve physical exercise – for example walking and cycling.
- **Frequent public service:** A public transport service that operates every 15 minutes or less (or every 30 minutes or less for a ferry) from Monday to Friday during the morning peak (7am-9am).
- **Frequent public transport stop:** A place where people can enter or exit a vehicle providing a frequent public transport service.
- **Rapid transit:** A frequent, reliable, and high capacity form of urban public transport that can swiftly move large volumes of people. Rapid transit vehicles run on fixed routes, usually separated from other traffic to avoid being delayed by congestion. Examples include rail, light rail, and bus rapid transit systems.
- **Rapid public transit stops:** A place where people can enter or exit a rapid transit vehicle.

### Suggested changes

#### Out of Scope

[Redacted text block]

**Policy 1:** Planning decisions contribute to well-functioning and vibrant urban environments that:

(c) enable people to easily access jobs, education, services, public open spaces, and places for social interaction, by public transport and/or active transport; and

Out of Scope

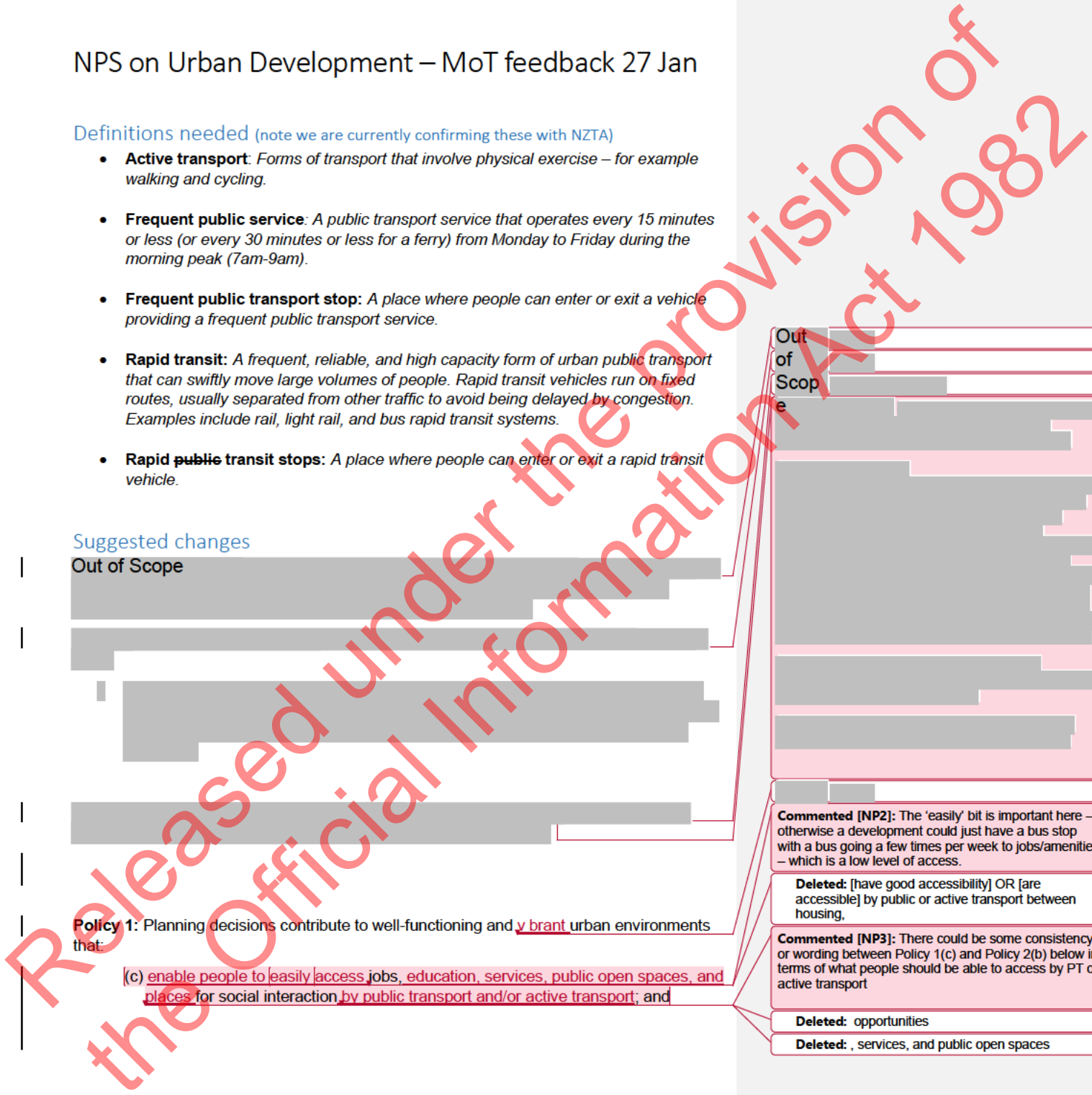
**Commented [NP2]:** The 'easily' bit is important here – otherwise a development could just have a bus stop with a bus going a few times per week to jobs/amenities – which is a low level of access.

**Deleted:** [have good accessibility] OR [are accessible] by public or active transport between housing,

**Commented [NP3]:** There could be some consistency or wording between Policy 1(c) and Policy 2(b) below in terms of what people should be able to access by PT or active transport

**Deleted:** opportunities

**Deleted:** , services, and public open spaces



**Policy 2:** Regional policy statements enable, and district plans provide for, greater density developments in areas where the benefits of urban development are best realised, such as in areas where any one or more of the following apply:

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(a) there is a high demand for housing:

(b) employment opportunities, *urban amenities* and services are easily accessible by:

Commented [NP4]: This word is important

(i) *active transport*, or

(ii) existing or planned rapid transit or frequent public transport services.

Commented [NP5]: Rapid transit could be included in the definition of PT, but ideally what we're looking for is most intensification around rapid transit stops, and then frequent (non-rapid) PT stops.

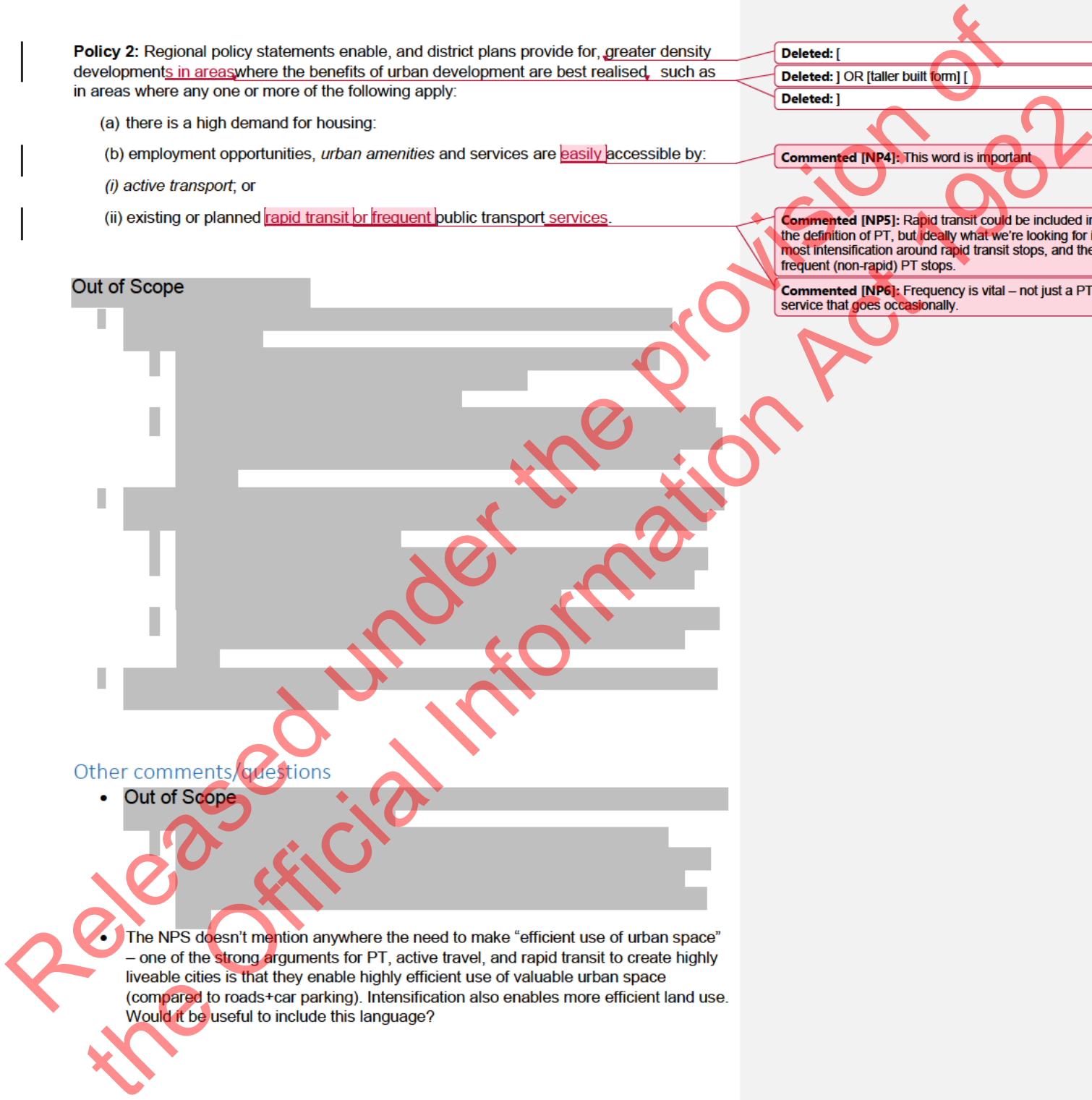
Commented [NP6]: Frequency is vital – not just a PT service that goes occasionally.

**Out of Scope**

[Redacted content]

**Other comments/questions**

- Out of Scope [Redacted content]
- The NPS doesn't mention anywhere the need to make "efficient use of urban space" – one of the strong arguments for PT, active travel, and rapid transit to create highly liveable cities is that they enable highly efficient use of valuable urban space (compared to roads+car parking). Intensification also enables more efficient land use. Would it be useful to include this language?



- Question – are we ‘future proofing’ the NPS for new/emerging forms of micro-mobility / little vehicles (e.g. e-bikes and e-scooters), which are rapidly growing?
- A broader question not specific to the NPS – What could happen with buildings/sites constructed under existing minimum parking requirements? Could some land/space currently used for parking be repurposed under proposed RMA changes, and what would this involve?

## Feedback on proposed scale options in ‘Checking policy implications from intensification policies’

### *Comments on the base case*

- This notes that the “walkable catchment” should be defined by the local authorities “or if not done then use 800m as a proxy.”
  - The current draft NPS does not identify this distance as a proxy – as noted above, it leaves it to the local authority to define.
  - Why was 800m suggested as a proxy?
  - The distance of the walkable catchment needs to differ for rapid transit and public transport stops – as people are generally more willing to walk a bit longer if there is a fast, reliable, and frequent RT service (compared to an occasional PT service).
  - The Transport Outcomes Framework (agree with NZTA) uses a standard of **500m from a bus stop** (~7 min walk) or PT ferry terminal, and **1km from a rapid transit stop** (~15 min walk) as the walkable catchment.
  - In the definitions, it needs to be clear that this is the actual walking route distance (i.e. not ‘as the crow flies’)
- Suggested height limits are 6 stories within a walkable catchment of RT stops, and 3 stories within a walkable catchment of “public transport nodes”.
  - Minimum building heights restrictions – if used as an instrument to encourage intensification – should only apply to **frequent** PT services – to encourage densification on key PT routes.
  - A **regular PT service** is one that operates at least every 30 minutes during the day.
  - A **frequent PT service** is one that operates every 15 minutes or less (or 30 minutes for ferry) during the morning peak Monday to Friday (7am-9am).
  - A key difference between PT and RT routes is that PT routes can often change – as bus routes can be changed relatively easily, whereas RT systems form the backbone of a transit system in part because they are fixed – giving greater certainty to households and developers that the service will remain, and ideally become more frequent, in the future.

### *Comments on Variable 1: Frequent PT stops*

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- This proposes 6 stories for both RT stops and 'frequent' PT stops
- Frequent public transport stop are defined as: "Three services per hour 7 am – 6 pm or every 15 minutes (or 30 minutes for ferry) during the morning peak Monday to Friday (7am-9am)".
  - A frequency of every 20 minutes (i.e. 3 per hour) is not very frequent.
  - At a minimum, the GPS definition of frequency should be used (every 15 minutes or less (or 30 minutes for ferry)).
  - Alternatively, change the current definition to "Three services per hour 9 am – 6 pm and every 15 minutes (or 30 minutes for ferry) during the morning peak Monday to Friday (7am-9am)".
- A 6 story limit for services that operate on a relatively low frequency of every 15 minutes is difficult to justify. It should be the same as the town and local centre levels (i.e. 3 stories), as it doesn't make sense to intensity along PT routes more than the town and local centres where we want people to be able to live and easily access amenities.

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**Comments on Variable 2: PT stops on main arterial routes**

- This proposes 6 stories for both RT stops and PT stops on arterial routes.
- It would be useful to understand the thinking behind this.
- Could it act as a disincentive to have PT services on arterial routes if it means enabling higher buildings?

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the Official Information Act 1982