Plan Change 12 – Enabling Housing: Re-assessment of Policy 3(d) of the National Policy Statement of Urban Development 2020 (NPS-UD) for Hamilton City

2024 Centres Evaluation Report

June 2024

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Executive Summary

Policy 3(d) of the National Policy Statement of Urban Development (NPS-UD) directs Hamilton City Council to enable residential intensification within and adjacent to commercial centre zones. In 2022, Hamilton City Council publicly released its proposed response to Policy 3(d), as well as responses to other directions within the NPS-UD, via Plan Change 12. The proposal for residential intensification around commercial centres within Plan Change 12 was based on a Section 32 Centres Assessment Report which provided a list of relevant centres and land use zoning recommendations.

Since public notification of Plan Change 12, public submissions have been received on the proposal. In addition, new flood modelling for the city has taken place and additional information on infrastructure capacity and servicing is better known. In particular, it is now widely appreciated that the city has serious three waters capacity issues across the network. As a result of information now information available, this report provides a further evaluation of centres suitable for intensification as intended by Policy 3(d) of the NPS-UD.

An additional strategic lens is used to assess the most suitable centres for residential intensification. This report assesses the Hamilton Urban Growth Strategy, the Hamilton Waikato Metro Spatial Plan, and other information available on flooding and infrastructure. This assessment suggests that a staged approach to intensification around key commercial centres is most appropriate with an initial focus around the most strategic centres in terms of size and location. Further, commercial centres and their surrounds that are most affected by flood hazards are recommended not to be intensified around as initially proposed. These centres include Nawton and parts of Dinsdale.

A staged approach to intensification that focuses on fewer centres at a time is considered more complementary for future infrastructure investment, such as three waters. The benefits of residential intensification are more likely to be realised when density occurs in areas where investment in infrastructure and other services that support intensification are commensurate with those densities. If too many centres are zoned for greater residential densities, it becomes increasingly difficult for infrastructure investment to be commensurate with growth, and the benefits of intensification are less likely to be fully realised.

The following staged approach to intensification around commercial centres is proposed:

Stage one

- Chartwell
- Five Crossroads
- Hamilton East (partially included within Central City catchment)
- Frankton (partially included within Central City catchment)
- Clyde Street Shops and the University

Stage two

- Glenview
- Thomas Road

1. Introduction

1.1 Purpose of report

This report provides a further evaluation of the Section 32 Centres Assessment Report prepared in August 2022 which assessed the application of Policy 3(d) of the National Policy Statement of Urban Development 2020 (NPS-UD) for Hamilton City.

The recommendations of this Centres Report form an evidence base for the latest zonning proposals in Plan Change 12 (PC12) – Hamilton City Council's response to the NPS-UD.

Policy 3(d) directs Hamilton City Council to enable residential intensification within and adjacent to commercial centre zones. The 2022 Section 32 Centres Assessment Report (2022 Centres Report) provided a set of land use zoning recommendations that responded to the NPS-UD Policy 3(d) direction. Since the 2022 Centres Report was published, submissions were received on PC12 and the evidence base that supports PC12 in relation to infrastructure and market feasibility has grown. In addition, Hamilton City Council was granted an extension to PC12 to update flood mapping information for the City. These changes and updated information available make it appropriate to review the 2022 Centres Report and provide a revised assessment and set of recommendations for PC12.

This Centres Report refinement includes an additional strategic assessment of the suitable centres recommended in the 2022 Centres Report and identifies which centres most align with the City's growth strategies and investment planning intentions. A final list of centres and zoning recommendations are provided.

1.2 Policy Context and Background

1.2.1 NPS-UD, Policy 3(d)

Policy 3(d) of the NPS-UD directs councils to intensify areas adjacent to suburban centres where there are already community services and commercial activities. These areas are likely to be serviced by current public transport routes or planned public transport routes. Policy 3 is set out below and Policy 3(d) is underlined.

> ***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 at 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) *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.*

The 2022 Centres Report sought to apply the above policy directive to the Hamilton context. The 2022 Report undertook a detailed assessment of the policy in relation to:

1) Which centre zones in the Hamilton Operative District Plan (ODP) Policy 3(d) applied to, and
2) Which centres were suitable for residential intensification, and
3) A final recommendation of centres suitable for residential intensification and the spatial extent of that intensification.

The direction to implement the NPS-UD remains the same, however, further up-to-date information is now available to Council staff that should inform zoning decisions. Most relevant to the assessment of Policy 3(d) is additional information available on flood hazard modelling and an improved understanding of infrastructure capacity and investment for the city.

PC12 was put on hold to accommodate updated flood hazard mapping which has now been completed and publicly released. Further, the three waters infrastructure constraints that affects large parts of the City have become better known. As appreciated when PC12 was initially notified, upgrading the entire city's infrastructure network to match the level of enablement proposed in PC12 is not possible. The Infrastructure Capacity Overlay notified within PC12 was proposed to manage the expected increase in connections to and pressure on the three-waters network. Since 2022, Council's understanding of the network and investment plans has continued to improve and as such, there is a growing interest to further target investment in the network where it is most needed first. Given the desire to target infrastructure investment where it is both most needed and will have the greatest returns on investment, there is a possibility that the number centres initially notified for intensification under Policy 3(d) challenges the overall desire for targeted investment.

With additional flood hazard information now available and an increasing need to take a more targeted approach towards residential intensification from an infrastructure investment perspective, a further refinement of the centres for intensification recommended in the 2022 Centres Report is needed.

2. 2022 Assessment

Figure 1 below indicates the steps taken in the 2022 Centres Report to identify which centres were suitable for intensification under Policy 3(d) as well as the zoning extent recommendations for each identified centre.

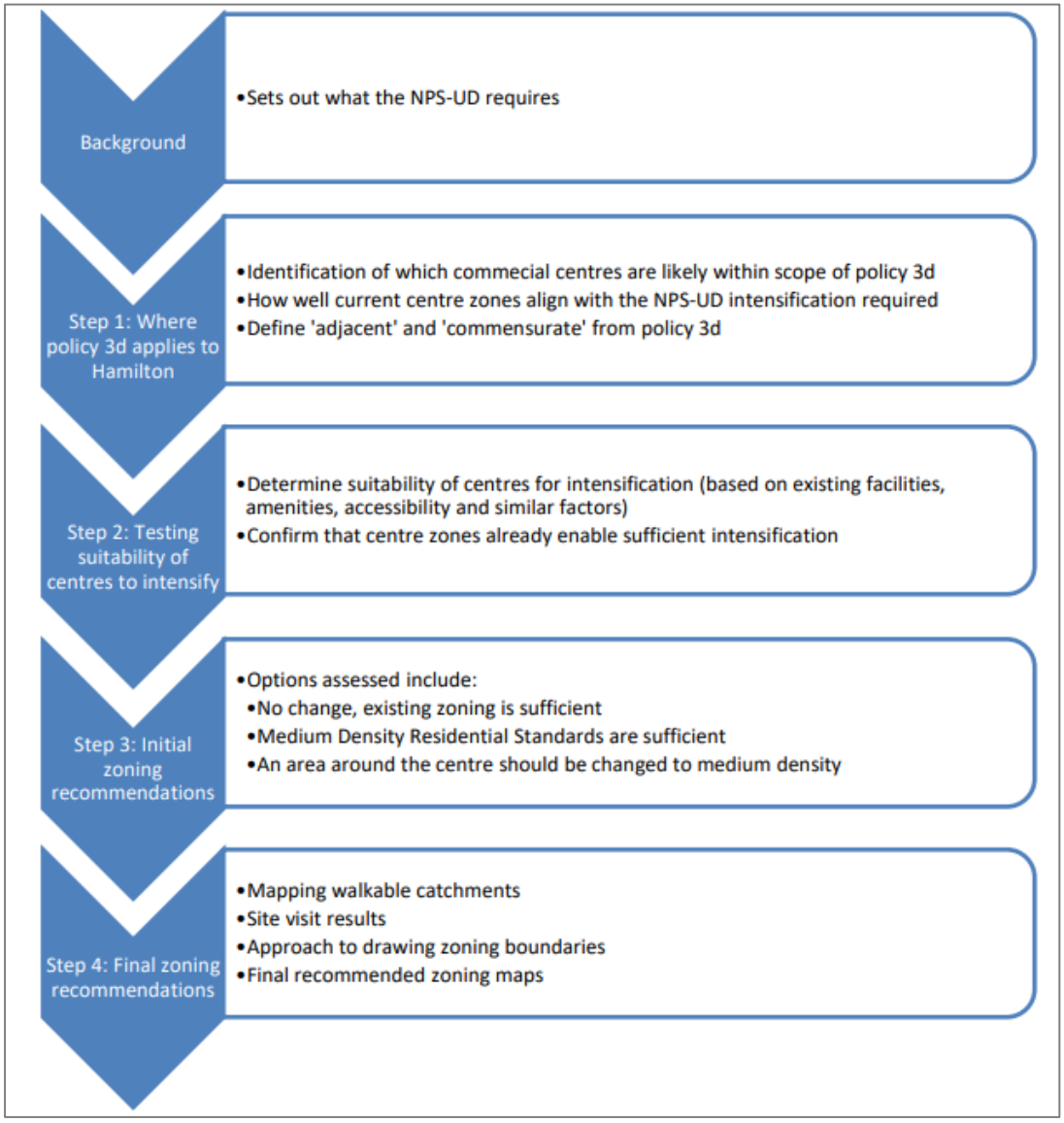

Figure 1: *2022 Centres Report assessment steps*

Overall, this report accepts the methods and findings of the 2022 Centres Report according to its scope.

2.1. Applicable Centres

For the purposes of identifying which commercial centres in the City were applicable to Policy 3(d), the 2022 Centres Report concluded that only sub-regional centre zones and suburban centre zones within the ODP met the intensification direction under Policy 3(d). The list of applicable centres found in the 2022 Centres Report includes:

1) The Base
2) Chartwell
3) Rototuna Town Centre

4) Thomas Road Shops
5) Five Crossroads
6) Clyde Street Shops
7) Hamilton East Village
8) Hillcrest
9) Glenview
10) Frankton
11) Dinsdale
12) Nawton
13) Rotokauri

2.2. 2022 Assessment criteria and findings

The 2022 Centres Report recognised that of the thirteen centres listed above, some of these might not be appropriate for residential intensification due to location-specific factors such as access to residential-related amenities. To further refine the centres list down to those that are most suitable for intensification, the 2022 Centres Report used the following criteria:

- Presence of a supermarket
- Presence of a healthcare provider
- Presence of a community facility such as a library
- Presence of adjacent residential zoning
- Degree of amenity provided by nearby parks, schools, and availability of public transport
- Any other relevant site-specific factors

All thirteen centres were assessed against the abovementioned criteria and a final list of ten centres suitable for intensification was established. Accompanying the list of appropriate centres was a recommended walkable catchment in which Medium Density Residential housing would be zoned for around each centre. These recommendations are provided in **Table 1** below.

Table 1: *2022 Centres Report findings*

Centre	Recommendation
Chartwell	Rezone 400m walkable catchment to medium density
Rototuna Town Centre	The ODP provisions are enabling of the urban form that the NPS-UD requires, so no change to the zone provisions is required.
Thomas Road Shops	Rezone 400m walkable catchment to medium density
Five Crossroads	Rezone 400m walkable catchment to medium density
Clyde Street Shops	Rezone 400m walkable catchment to medium density
Hamilton East Village	Rezone 400m walkable catchment to medium density
Glenview	Rezone 400m walkable catchment to medium density

Frankton	Medium-density residential within the currently zoned industrial land bound by the railway line and extending to Norton Road on the northern side of the centre and Upper Kent Street in the south.
Dinsdale	Rezone 400m walkable catchment to medium density
Nawton	Medium-density residential within a 200m walkable catchment

In the conclusion of the 2022 Centres Report, the limitations of its analysis are raised. The report notes that the following factors were not considered when assessing each centre's appropriateness for intensification:

- the application of qualifying matters
- infrastructure constraints
- any other NPS-UD policies
- the viability of intensification

3. Post Notification Evaluation

Since the 2022 Centres Report was published, updated flood hazard modelling has been completed and information on the city's infrastructure is better known. Considering these changes, and the limitations noted for the 2022 Centres Report, a further assessment of centres suitable for intensification follows.

3.1. Flooding

Since the notification of PC12, new flood modelling of the City has been completed and an update to the flood hazard provisions in the District Plan is being developed through Plan Change 14. With updated flood modelling now available, this presents an opportunity to revisit zoning proposals around some centres where flood risk is more pronounced than others.

Notwithstanding the opportunity to reduce the risk and extent of flood impacts via potential down-zoning, it is important to recognise that there are many engineering and building design solutions available to help mitigate the extent of flood risk. Further, flood hazard provisions apply to all zones and their intent is to ensure development on those sites affected by flooding is done appropriately, whether that be through engineering and design solutions, or a reduced level of activity on that site. The city's flood hazard provisions are currently being updated via PC14 and are due for public notification in the second half of 2024. Overall, depending on the level of risk, the presence of flood hazards on a site or neighbourhood area should not immediately preclude higher density zoning and intensification from occurring in those areas.

The extent of flooding in the notified centres has been assessed and is summarised in **Table 2** below. Of the centres recommended for intensification in 2022, three centres have relatively large areas of flood hazard affecting sites notified as Medium Density Residential Zone (MDRZ) including Nawton, the University, and Dinsdale.

Table 2: *100-year flood hazard for each centre notified for MDRZ, PC12*

Centres	Percentage (%) of residential parcels affected by 100-year flood hazard that cover 11% or more site area
Chartwell	12
Dinsdale	**28**
Five Crossroads	17
Glenview	12
University	**31**
Nawton	**47**
Thomas Road	7

As seen in **Figure 2** below, Nawton is affected by flood hazard directly around the neighbourhood centre where MDRZ has been proposed. Noted in **Table 2** above, 47% of sites are affected by the 100-year Flood Hazard overlay within the 200m walkable catchment where MDRZ was proposed. Most noticeable is the contiguous area of flood hazard directly north of the neighbourhood centre along Clancy Place and Grandview Road.

Figure 2: *HCC Flood viewer – Nawton Area*

Similarly, the University area has a large proportion of sites affected by flooding, as seen broadly in **Figure 3** below. It is noted that many of these sites are in the existing Residential Intensification Zone under the ODP, such as along York Street, and it is out of scope to down-zone or reduce enablement of housing under PC12.

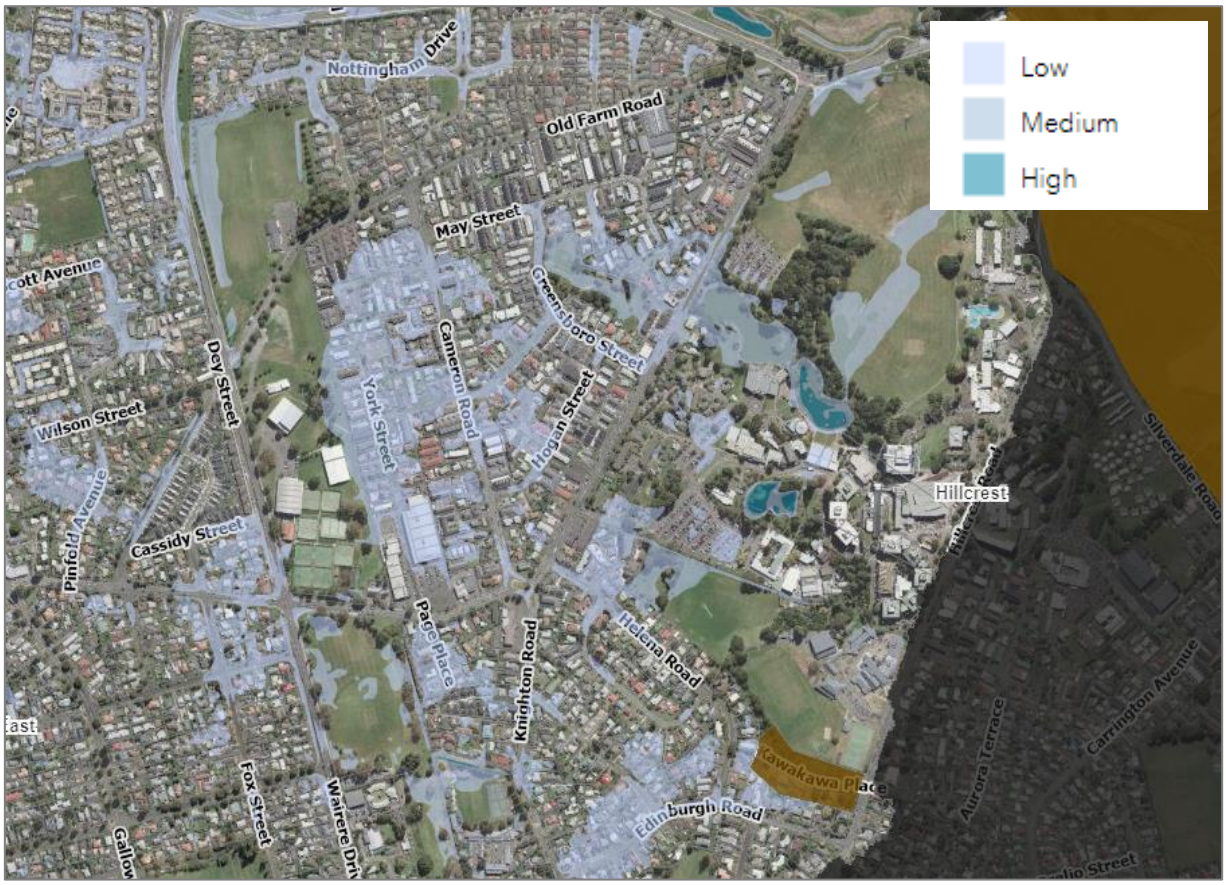

Figure 3: *HCC Flood viewer – University/ Clyde Street Shop Area*

Concerning Dinsdale, shown in **Figure 4** below, a significant area to the west of the shopping centre area and south of Whatawhata Road is affected by the 100-year Flood Hazard overlay. Like the University area, it is important to note that east of the Dinsdale shopping centre is currently zoned Residential Intensification in the ODP. Only the western side of Dinsdale was introduced as MDRZ as a part of PC12 and this is where flood hazard is most pronounced and contiguous.

Figure 4: *HCC Flood viewer – Dinsdale Area*

The relatively elevated risk to flooding in Nawton, the University, and Dinsdale combine with the flood hazard provisions that apply to affected sites (currently under review through PC14) makes development more controlled in these areas compared to the rest of the city. It has been noted that large parts of the University area notified as MDRZ are already an intensification area that cannot be downzoned. However, up-zoning around Nawton and the western area of Dinsdale to allow for greater residential densities, as notified under PC12, can be changed. Down-zoning these areas from the proposed MDRZ to General Residential Zone would reduce the number of people exposed to an elevated risk of flood hazard. In addition, due to the nature of brown-field infill development, without a comprehensive response to stormwater management, higher density development could exacerbate this flood hazard risk. Given the scale of flood hazard around these centres, up-zoning around Nawton and the western area of Dinsdale to MDRZ is not recommended as it was under the notified version of PC12 rather, these areas should remain as General Residential Zone.

3.2. Three Waters

In accommodating Te Ture Whaimana as a Qualifying Matter, PC12 as notified introduced an Infrastructure Capacity Overlay (ICO) to assist in the management of residential densities across applicable areas of the City. The ICO as notified requires infrastructure impact assessments on the network where new development meet net site area thresholds for the zone. The ICO is intended to support staged and strategic investment in critically needed three-waters upgrades across the City that address both historical, current, and future network capacity issues. Without an ICO, there is a real risk of network failure and thus, detrimental effects of the Awa and the wider environment.

As per the three-waters evidence prepared by Ms Colliar and presented in Session 1 of the PC12 hearings, "The City's Three Waters infrastructure cannot accommodate the levels of urban intensification already enabled by the District Plan or that proposed by the MDRS and the NPS-UD without significant investment." Given the current wastewater and water capacity issues across the City, a further refinement of centres suitable for intensification is necessary so that infrastructure investment can be efficiently targeted and the returns on investment maximised further.

In the case of three waters infrastructure and in particular water and wastewater, the level of existing capacity should not solely determine the outcome of intensification suitability, especially if there are plans for upgrades to the network. Network upgrades for new housing growth will, among other factors, be determined by growth projections and zoning provisions under the District Plan. Determining which centres will have network investment and thus capacity for growth in the future is difficult to make until a final list of centres is known and prioritisation of investment can then occur - taking the lead from the city's zoning and the growth that is enabled from this.

3.3. Transport

To realise the desired outcomes of land-use planning (i.e., residential intensification) and transport planning and investment, alignment is required between the two. As such, where transport upgrades and new public transport planning are proposed, this should inform land-use planning and vice-versa - representing the symbiotic relationship between transport and land-use planning.

While the 2022 Centres Report assessed the level of transport services in each potential centre, that assessment only concerned then-present accessibility and not future transport planning intentions. Since the 2022 notification of PC12, the planning of public transport for the city has progressed and there is now an opportunity to strengthen the alignment between PC12 and these plans. Of relevance is the growing volume of planning being conducted for future frequent bus routes across the city, including Bus Rapid Transit, all of which reflect the direction set by the Hamilton-Waikato Metro Spatial Plan.

3.4. An approach for further evaluation

To strengthen the alignment between zoning decisions around centres and the infrastructure matters highlighted above, adding a strategic lens to the centres assessment is highly valuable. Assessing the centres recommended in the 2022 Centres Report against wider strategic planning for the city will help assign priority to centres that are most suitable for intensification, and thus where necessary infrastructure investment might then occur. In addition, adding a strategic lens will strengthen the alignment of land-use planning with broader transport planning, including public transport which has an interdependent relationship with land-use activities, and will better ensure a future well-functioning urban environment.

It is important to acknowledge that increased density options across the city would create greater flexibility for the market to supply housing options. However, allowing intensification across too broad of an area may dilute the ability to concentrate growth into the most desirable areas and may result in greater costs associated with infrastructure sequencing.

Current three-waters infrastructure capacity across the city is unable to accommodate greater levels of intensification, let alone existing growth, without further investment. Intensification that occurs in predictable parts of the city allows spatially targeted investment in critical infrastructure and

amenity that makes those areas capable of accommodating higher residential densities compared to a dispersed development scenario.

Staging areas of intensification to allow infrastructure investment to align with growth, therefore, is appropriate. Selecting the readiest and most strategically well-aligned centres for intensification in a staged manner balances the need to allow increased housing options around suitable centres immediately with the need to ensure adequate infrastructure serving across the city. Overall, achieving more integrated land-use planning with infrastructure will help culminate in the well-functioning urban environment aspired to by the NPS-UD.

4. Strategic alignment

To determine the staging of centres being intensified around, an assessment of strategic alignment is necessary. The centres proposed for MDRZ under the notified version of PC12 range in scale and commercial and amenity offerings. Not all the centres are equal, and some have a higher status of strategic importance, for example Chartwell is a sub-regional centre while Nawton is a sub-urban centre. Further, while there might be several centres that are suitable for intensification in and of themselves, there is a possibility that the total number and combination of centres identified is not appropriate. To determine the 'appropriateness' of centres being intensified around, in terms of the number of centres and their combination, the level of alignment with other strategic planning documents for the city and region is assessed, including the Hamilton Urban Growth Strategy, and the Hamilton-Waikato Metro Spatial Plan.

4.1 Hamilton Urban Growth Strategy

The Hamilton Urban Growth Strategy (HUGS) guides where, when, and how Hamilton should grow over the next 50 years. HUGS was last updated in 2023.

Overall, HUGS contains three primary outcomes:

1. Grow up and out from the central city.
2. Grow along transport corridors.
3. Support the development of quality greenfield neighbourhoods.

Outcomes One and Two are directly related to identifying appropriate centres for intensification. Growing 'up and out' from the central city directs intensification to occur centrally first. The walkable catchment and intensification enabled within the Central City's catchment under Policy 3(c) and as notified in PC12 is directly reflective of Outcome One.

Outcome One also seeks regeneration of existing urban communities. Moving outside of the central city walkable catchment, Outcomes One suggests that other urban centres for intensification should be prioritised from the city centre core outwards. Further, Outcome Two seeks intensification along key transport corridors and interchanges – both existing and planned. From a centre's perspective, suburban centres are often a hub of public transport routes, such as Chartwell.

Outcome Two also raises the question of corridor intensification along key existing and planned transport corridors. In addition to the Te Rapa corridor that was notified with high and medium density zoning, the corridor between the Central City, Five Crossroads and Chartwell is another route

where intensification would align with Outcome Two of HUGS and the Metro Spatial Plan. This is further discussed below.

4.2 Hamilton-Waikato Metro Spatial Plan

The Hamilton-Waikato Metro Spatial Plan (MSP) is a vision and framework for how Hamilton City and its neighbouring communities within the Waipā and Waikato districts will grow and develop over the next 100 plus years. The MSP seeks to align the type and location of land-uses with infrastructure, including transport planning. The MSP targets future population growth areas suitable for medium to high density housing and mixed-use areas. These areas of residential intensification are purposefully located alongside current and future envisioned transport infrastructure that can provide a high-quality transport network whether that be walking, cycling or by frequent and rapid public transport connections.

As shown in **Figure 5** below, MSP envisions a central city spine for transport connections moving north and south between Te Rapa and the Central City, the Hospital, and Peacocke. Eastbound connections are indicated from the Central City towards the University and Ruakura, as well as connections via Five Crossroads and north towards Chartwell.

Aligned with the general direction of public transport connections envisioned by the MSP, a key growth corridor for jobs and economic activity is identified in the MSP. This growth corridor runs from Horotui south down to Waikato Hospital, and from the Central City eastward to the University of Waikato and Ruakura.

To further support public transport outcomes along the above-mentioned corridors, key metropolitan centres for residential intensification are identified in MSP. The metropolitan centres include Te Rapa and Chartwell. Additional existing town centres identified in the MSP that could be appropriate for intensification are also listed and include; Frankton, Dinsdale, Rotokauri, Rototuna, Thomas Road, Hamilton East, and the University.

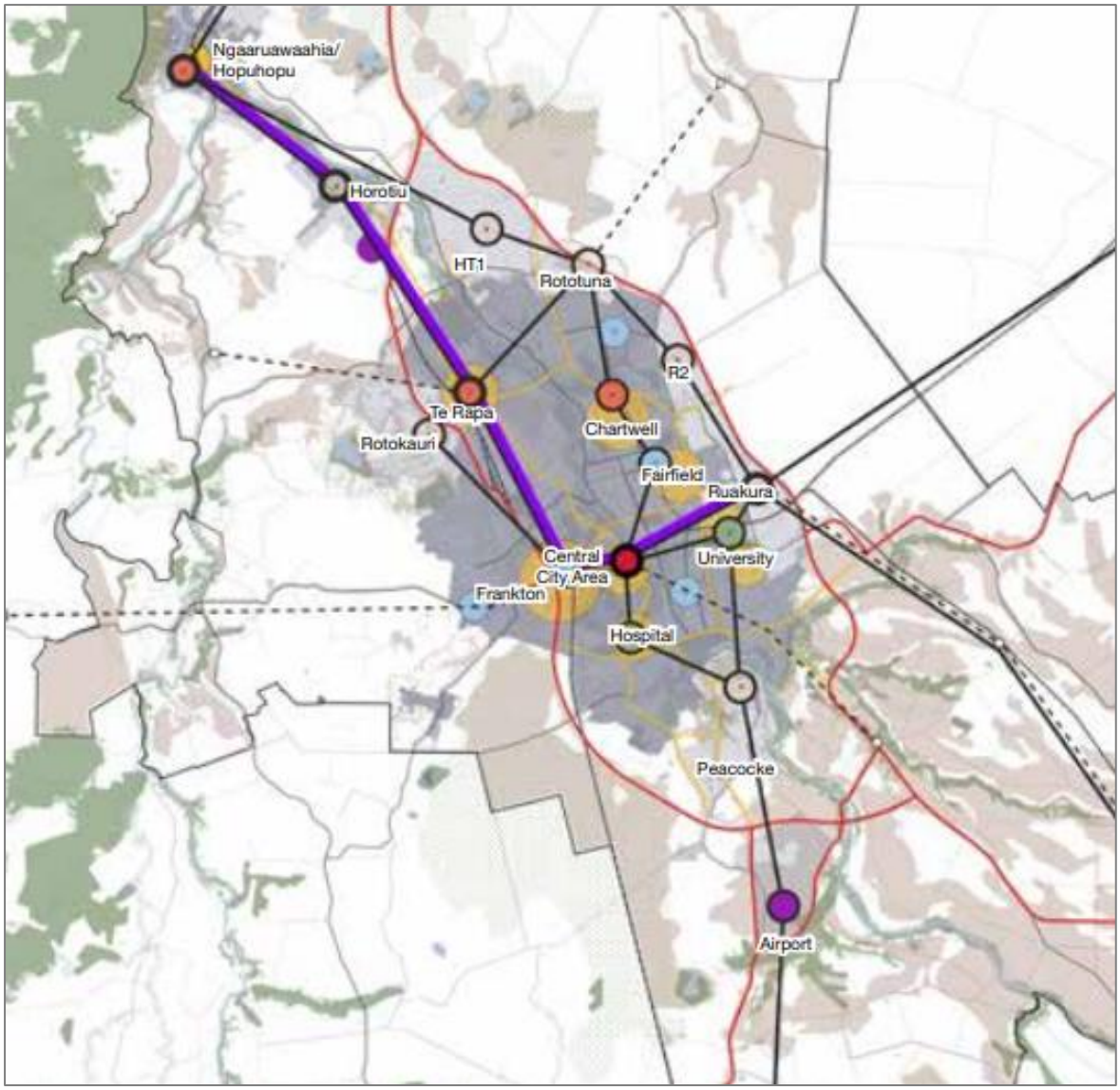

Figure 5: *MSP Map - Hamilton*

4.2.1. MSP and PC12

There are two core aspirations of MSP relevant to this report's assessment:

- An urban form shaped around a multi-modal rapid and frequent transport network and the objective of a radical mode shift to public transport and active transport modes, and
- Enabling a wide range of urban development opportunities to enhance competitive land markets through both expansion and intensification.

The outcomes sought in the NPS-UD align well with those in MSP. There is significant opportunity through PC12 to work towards the vision of the MSP including its integrated transport planning aspirations.

The 2022 Centres Report algins well with MSP where all centres listed and subsequently zoned for Medium Density Residential Zoning in PC12 are noted in MSP or are additional centres, such as Nawton. The most significant difference is that Te Rapa was not recommended as a centre for intensification in the 2022 Centres Report due to the absence of existing residential activities in the area around The Base. However, the corridor for growth along Te Rapa and out towards Ruakura that MSP identifies largely matches the Central City walkable catchment, Central City North area,

and the Hamilton East Village area that has been notified as medium and high-density residential zone in PC12.

While there is good alignment between the MSP and what was notified by PC12 in 2022, there is still opportunity for further alignment. The most significant opportunity for alignment lies along the corridors between the Central City, Five Crossroads, and Chartwell. Through MSP, and the work that is consequently flowing from it, this route has been recognised as appropriate for significant public transport enhancement including partial incorporation into a future planned Bus Rapid Transit Network and increased frequency of services. Allowing greater levels of residential intensification along this corridor, as has been done along Ulster Street and Te Rapa Straight in the notified version of PC12, would further support the realisation of the MSP vision.

5. Recommendations

Firstly, as discussed in Section 3.1 of this report, greater Dinsdale and Nawton are not recommended for further intensification compared to what is currently enabled under the ODP given the extent of flood hazard present in and around those neighbourhood centres. As such, where MDRZ was proposed in Nawton and Dinsdale under the notified version of PC12, these areas should instead remain GRZ.

As discussed in Section 3.4 of this report, a staged approach to intensification around centres is recommended. To stage the remaining centres for intensification under Policy 3(d), the centres recommended in the 2022 Centres Report have needed to be prioritised. Using the direction provided for in HUGS, MSP, and the NPS-UD, and balancing this with the latest flooding information and infrastrucutre needs, this report recommends the following staged approach to centres intensification.

Stage one – PC12

- Chartwell
- Five Crossroads
- Hamilton East (partly included within Central City catchment)
- Frankton (partly included within Central City catchment)
- Clyde Street Shops and the University

As highlighted in the 2022 Centres Report, the Rotokauri and Rototuna Town Centres are already enabled by the ODP and only minor alterations are required to integrate those areas into the PC12 framework.

Stage two – a future plan change

- Glenview
- Thomas Road

The above Stage One list of centres is considered most aligned with the direction of MSP and further public transport investment. While those centres recommended for Stage Two also share some alignment, they do not feature as prominently in the strategic direction for intensification. To compliment priority transport network enhancements, the Stage One recommended centres are indicated to be key centres that require intensification sooner rather than later compared to the Stage Two centres.

Further, Outcome Two of HUGS suggests intensification from the urban core outward. Both Glenview and Thomas Road are on the periphery of the city compared to other centres recommended. In addition, while the Glenview shopping centre (GFA of 4,271m^2) has a range of convenience retail, these are not of the same scale as those offered in Chartwell (GFA of 35,847m^2) or Five Crossroads (GFA of 11,574m^2).

By rationalising the centres recommended, there is an improved balance between enabling residential intensification in strategic areas of the city as directed by the NPS-UD and envisioned by the MSP, and the pressing infrastructure investments that are required to accommodate both existing and future growth across the city. By staging the centres, intensification is enabled in the most appropriate and suitable centres and allows infrastructure investment to be more targeted.

The final zoning recommendations for each centre are provided in **Table 3** below.

Table 3: *Updated centres and zoning recommendations for PC12*

Centre	Updated Recommendation
Chartwell	Rezone 400m walkable catchment to MDRZ
Rototuna Town Centre	The ODP provisions are enabling of an urban form that the NPS-UD requires, so no change to zoning is recommended from what was notified in PC12
Thomas Road Shops	Remove from Centres list and maintain GRZ
Five Crossroads	Rezone 400m walkable catchment to MDRZ
Clyde Street Shops	Rezone a reduced area of MDRZ around the neighbourhood centre
Hamilton East Village	Rezone 400m walkable catchment to MDRZ
Glenview	Remove from centres list and maintain GRZ
Frankton	No change to zoning is recommended from what was notified in PC12
Dinsdale	Limit MDRZ to the current ODP Residential Intensification Zone area
Nawton	Remove from centres list and maintain GRZ

It is noted that MSP considers Chartwell to be a metropolitan centre. Under the NPS-UD, Policy 3 expects metropolitan centres to be zoned to allow up to six storey residential developments within a walkable catchment. Under PC12, the only area included as High-Density Residential Zone that enables 6 storeys is around the Central City walkable catchment. Compared to the Central City, Chartwell lacks in offering diverse employment opportunities other than what is already there - namely retail and small medical services. MDRZ is, therefore, considered the most commensurate form of residential zoning for Chartwell. Regardless, the proposed MDRZ enables a relatively high-density form of development and where appropriate, does provide an anticipated pathway for higher levels of activity should the context and site-specific attributes mean that is appropriate.

6. Conclusion

The staged approach recommended by this report seeks to balance out the direction of the NPS-UD and general desire for housing enablement with the serious infrastructure constraints that exist across Kirikiriroa-Hamilton. An additional broader strategic lens has, therefore, been used to identify the centres recommended for intensification.

Overall, it is recommended that the zoning around the Stage One centres remain as notified except for along Clyde Street, as discussed above. It is considered that the 2022 Centres Report provides sufficient analysis of each centre and the commensurate level of residential activity appropriate around each centre, being MDRZ within a 400m walkable catchment. In addition, this report considers there to be benefit in residential up-zoning along key transport corridors between the Central City, Five Crossroads, and Chartwell. Determining the most appropraite zoning along those corridors, however, is not within the scope of this report.

Two centres are recommended not have any additional up-zoning around them, including Dinsdale and Nawton due to the flood hazards present. Maintaining the existing operative GRZ around the Dinsdale and Nawton centres will help prevent more people being exposed to flood hazard risks identified.

To allow higher residential densities across a broad area of the city will only reduce the ability of Council to match infrastructure investment spatially with growth. Concentration and predictability of residential intensification is the most desirable outcome from an infrastrucutre investment perspective. Further, the staging approach recommended allows other forms of investment (i.e., general residential amenities like street scape improvements) for enabled areas to also occur commensurately, helping better realise the many benefits of residential intensification beyond housing affordability.