

**BEFORE THE AUCKLAND UNITARY PLAN INDEPENDENT HEARINGS PANEL**

**IN THE MATTER** of the Resource Management Act 1991  
and the Local Government (Auckland  
Transitional Provisions) Act 2010

**AND**

**IN THE MATTER** of **TOPIC 081d** Rezoning and Precincts  
(Geographic West)

**AND**

**IN THE MATTER** of the submissions and further  
submissions set out in the Parties and  
Issues Report

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**STATEMENT OF REBUTTAL EVIDENCE OF MARTIN JOHN PEAKE  
ON BEHALF OF AUCKLAND COUNCIL**

**AVONDALE 1 AND 2 PRECINCTS**

**(TRANSPORT)**

**25 FEBRUARY 2016**

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## 1. SUMMARY

- 1.1 My name is Martin John Peake, I have been engaged by Auckland Transport to assist Auckland Council (**Council**) to assess the traffic and transportation matters on the proposed provisions of the Proposed Auckland Unitary Plan (**PAUP**) for the Avondale 1 and 2 Precincts. My qualifications, experience, and commitment to comply with the Code of Conduct for Expert Witnesses are set out in my evidence report in relation to these precincts, dated 26 January 2016.
- 1.2 I have assessed transport evidence provided by Mr Philip Brown on behalf of the Avondale Jockey Club (**AJC**) (submitter 6218) on the Avondale 1 precinct.
- 1.3 I do not support the submitter's proposal to delete the precinct land use rule 3.2: (Infrastructure). However, in response to the AJC's concerns, I do support the amendment to this rule proposed in the rebuttal evidence of Mr Nicholas Pollard.
- 1.4 I do not support the submitter's request for removal of the indicative roads shown on Precinct Plan 1 for Avondale 1 as the road provides connectivity (including public transport) for the precinct to the town centre and to the wider transport network.

## 2. INFRASTRUCTURE RULE 3.2

- 2.1 Mr Brown at paragraph 7.4 of his evidence requests the deletion of rule 3.2 as he is concerned that this rule would prevent the staged development of the precincts.
- 2.2 I acknowledge Mr Brown's concerns and agree that the rules should not prevent the possible staging of development. The timing of various parts of the development within the precinct will affect the likely supporting infrastructure (such as site accesses and / or internal roads). The Integrated Transport Assessment for the precincts would confirm the exact infrastructure requirements and triggers for when this infrastructure is required.
- 2.3 I have discussed the rule with Mr Pollard and agree with Mr Pollard's amendments to the rule in his rebuttal evidence which acknowledges that staging of the development could occur. Although the evidence of Mr Brown relates only to Avondale 1 precinct, I support amending the equivalent rule 3.2 of the Avondale 2 precinct, to provide for staged development.

2.4 I do not consider that deleting the infrastructure rule in its entirety is appropriate as I consider it necessary to ensure that the infrastructure identified on the precinct plans is implemented as part of the development and at the appropriate time.

### **3. INDICATIVE ROADS**

3.1 Mr Brown requests the deletion of the indicative roads on the precinct plan for Avondale 1 for the following (summarised) reasons:

- (a) Indicative road on the wedged shaped piece of land between Elm Street and Racecourse parade would prevent the practical development of that land separately to the remainder of the precinct (para 9.1);
- (b) The indicative road would prevent or significantly compromise the future construction of a future underpass under the race course to the inner fields (para 9.6); and
- (c) The indicative roads (Elm Street to Racecourse Parade and Elm Street to Ash Street) affect development potential and provide a wider community benefit and should be provided as part of a designation process and should be progressed by Council (paras 9.5 and 10.1).

3.2 My primary evidence in Paragraphs 9.1 to 9.8 provides a detailed rationale for the provision of the indicative roads. In summary, I consider that the indicative roads are:

- (a) Consistent with Subdivision Policy 21 to provide a connected network that supports communities and connections between sites and amenities;
- (b) Consistent with the RPS strategic direction to maximise street network connectivity and promote integrated transport systems and accessibility;
- (c) Consistent with the precinct objectives and policies by providing links between and through the site to Avondale Town Centre and public transport (Rapid and Frequent Service Networks); and
- (d) Consistent with precinct objectives to connect Sub-precinct A with Avondale Town Centre.

3.3 The removal of indicative roads will compromise access to the Town Centre and to public transport on Great North Road (Frequent Service Network) and Avondale Train Station (Rapid Service Network). The Ash Street frontage development (Sub-

precinct A) would effectively become a stand-alone development with no direct connection to the town centre.

- 3.4 Whilst I acknowledge that the increase in walking distance without the connection may only be 100m from Sub-precinct A, the alternative route is less direct and less convenient.
- 3.5 Site observations show that there is currently a pedestrian desire line through the race course land between the end of Racecourse Parade (from the town centre) and to Ash Street as indicated in Figure 1. Observations during the morning peak on Monday 22 February 2016 (0800-0900) recorded 29 pedestrians and four cyclists. Whilst pedestrians may currently be walking through the privately owned grounds of the racecourse, they appear to be tolerated by the AJC. This shows that there is already a requirement for a connection between Ash Street and the town centre; such demand is only likely to increase with the development of the precinct.



**Figure 1 - Observed Pedestrian Desire Line**

- 3.6 Mr Brown states that the road through the wedge shaped piece of land would “very significantly compromise or render impossible the potential to provide underpass vehicle access in the future to the track infield” (para 9.6). At this stage there is no obvious plan to provide an underpass. However, the rules only require road to be provided in general accordance with the precinct plan. I consider that this provides sufficient flexibility for the design to allow for the creation of the underpass.
- 3.7 Mr Brown suggests that the indicative roads would be best provided through a designation process (para 9.5) as the “road is primarily required for a wider public benefit” rather than through the precinct plan.

- 3.8 In my opinion the need for the road is primarily due to the proposed development of the site. Its function would be to provide access to the various sub-precincts and ensure that the sub-precincts are connected to the town centre and to public transport; a specific benefit for the precinct.
- 3.9 I acknowledge that there is currently a pedestrian desire line through the race course site, and the indicative road would enhance connectivity for the wider community to Avondale Town Centre and public transport. However, these roads are primarily for the future benefit of the occupant of the site and are unlikely to meet the threshold for a designation as set out in the evidence presented by Mr Brown as part of Topic 028<sup>1</sup> (Indicative Roads and Overlays).
- 3.10 The indicative road through the precinct between Racecourse Parade and Ash Street can be split into two parts; north of Elm Street and south of Elm Street. Whilst the two sections could be constructed at separate times, they are both required to provide connectivity to Avondale Town Centre and to public transport. In my view if the southern indicative road is not constructed, this would significantly compromise the connectivity provided by the northern section.

#### **4. CONCLUSIONS**

- 4.1 Following my review of the submitter's evidence for the Avondale 1 and 2 Precincts I have reached the following conclusions:
- (a) The infrastructure rule should be retained with the amendments as proposed by Mr Pollard in his rebuttal evidence to ensure development and infrastructure can be provided in stages; and
  - (b) The indicative roads shown on the precinct plan for Avondale 1 should be retained as they are required for the connectivity of the Precinct to Avondale Town Centre and to public transport and are for the primary benefit of the future occupants of the land.

**Martin Peake**

25 February 2016

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<sup>1</sup> Unitary Plan Topic 028 Indicative Roads and Open Space Overlay (Planning), 20 February 2015, Mr P Brown, para 6.5.