

**BEFORE THE HEARING PANEL**

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of Proposed Plan Change 5 to the Operative Hamilton  
City District Plan

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**REBUTTAL STATEMENT OF EVIDENCE OF IAN COLIN MUNRO  
(URBAN DESIGN – LOCAL CENTRE)**

**Dated 22 September 2022**

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**LACHLAN MULDOWNEY**  
BARRISTER

**P** +64 7 834 4336 **M** +64 21 471 490

**Office** Panama Square, 14 Garden Place, Hamilton

**Postal** PO Box 9169, Waikato Mail Centre, Hamilton 3240

**[www.lachlanmuldowney.co.nz](http://www.lachlanmuldowney.co.nz)**

## **INTRODUCTION**

1. My full name is Ian Colin Munro.
2. My qualifications and experience are as set out in my statement of evidence dated 2 September 2022 (**primary evidence**).
3. I reconfirm that I have read and am familiar with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014 and I agree to comply with it.

## **PURPOSE AND SCOPE OF EVIDENCE**

4. The purpose of this rebuttal statement of evidence, provided on behalf of Hamilton City Council (**HCC**) as the proponent of Plan Change 5 (**PC5**), is to briefly respond to the urban design evidence of Mr. Richard Knott on behalf of Woolworths NZ Ltd (**Woolworths**). As part of that I confirm that my response also addresses the architectural evidence of Mr. John Sofo and planning evidence of Mr. Philip Brown (but only where they have addressed my primary evidence).

## **EXECUTIVE SUMMARY**

5. In my opinion Mr. Knott's analysis seems incomplete. But I have particular disagreement with him in terms of the Peacockes Road condition, centre fragmentation, and suitability of the Rototuna North centre as any kind of relevant exemplar to support his position.
6. I remain of the opinions and recommendations set out in my primary evidence.

7. In the event that the Panel is persuaded to agree with Woolworths, I recommend it consider restricting the activities that can occur on its site to a supermarket only.

#### **PEACOCKES ROAD**

8. Mr. Knott, Mr. Sofo and Mr. Brown disagree with me that there would be any pedestrian connectivity concern with extending the centre westwards across Peacockes Road.
9. There is no question that a signal-controlled pedestrian crossing facility will be provided at the intersection of Peacockes Road and Whatukooruru Drive. This will allow safe access for pedestrians between the PC5 Local Centre Zone and the Woolworths site. The urban design evidence of Mr. Wayne Bredemeijer includes what I understand is the latest thinking on that.
10. The urban design concern is not whether pedestrians can access the centre. It is how pedestrians might then act when they are *within* the centre as shoppers that (one hopes) visit multiple businesses as conveniently as possible. These are very different considerations and should not be conflated.
11. Supermarkets are generally regarded as useful magnets within centres because of the very high volume of visitors they attract. The design objective is to configure the centre so that as many people as possible planning a trip to a supermarket can be exposed to or enticed to other activities that they might not have otherwise visited (and which benefit from being 'street based' and otherwise focused to where supermarket visitors can both see them and access them very conveniently).
12. Generally, and largely because of the volume of goods purchased in a typical shop, upwards of 90% of supermarket shoppers typically arrive by vehicle. This places great significance on the location of the car park

relative to the other businesses available and a main street in the hope that a shopper might undertake a convenient 'round trip' culminating in the supermarket shop and trip home (the supermarket is usually last, so shoppers can transport frozen goods home quickly).

13. The PC5 proposition is significantly superior than the Woolworths site in urban design terms because it allows more supermarket visitors to be exposed to the main street and its businesses and gives them much more convenient access to the entirety of the main street (akin to a 'triangle' movement). A Woolworths supermarket on the west of Peacockes Road, depending on how that supermarket was configured, could allow visitors to come and go without in any way being exposed to the main street, and meaning those persons would only come to the main street in a stretched, linear movement pattern, if they had an explicit planned reason to do so. This is, in my opinion, a significantly inferior proposition to the PC5 Local Centre.
14. A shopper parked west of Peacockes Road would need to first walk to the intersection, then wait for a pedestrian signal (on a 120s cycle, an average wait of 60s would be likely), then cross 4 x vehicular travel lanes, 2 x cycle lanes, and the various separation buffers and islands based on what I understand is the current intent for that road as and presented by Mr. Bredemeijer. The shopper would also be positioned at one end of the main street, and need to walk its full length to the opposite end to visit any business there. This trip would be doubled in net length on the return, and would add, in my opinion, at least 2 to 3 minutes of pedestrian travel time to enable no greater opportunity to engage in exchange than the PC5 centre as proposed. This is, in my opinion, is a significantly inferior proposition to the PC5 Local Centre.
15. In the Planning, Retail Economics and Urban Design Joint Witness Statement dated 25 August 2022 (**JWS**) and in my primary evidence, I recorded my view that the design and width of Peacockes Road would need

to be significantly changed to overcome (at least part of) the deficiencies I have identified. What I had in mind was not the provision of a crossing facility; that was always 'on the table'. For Peacockes Road to not be a fundamental severance or divider between what would become two centre lobes, Peacockes Road would need to take on characteristics similar to that proposed for the PC5 main street, i.e., two lanes maximum of vehicular traffic and the narrowest possible vehicular carriageway, provision for on-street parking, and the integration of cycle traffic into slow-speed vehicle lanes rather than via separated lanes. This would be sufficient to overcome the greatest of my concerns as to the inferiority of the proposed Woolworths site and allow pedestrians to much more readily and conveniently move back and forth without experiencing an obvious and disincentivising delay. But I understand it is not achievable based on identified transportation needs.

#### **CENTRE FRAGMENTATION**

16. Mr. Knott, Mr. Sofo and Mr. Brown disagree with me that there would be any centre fragmentation effects of any concern likely because pedestrians would be able to walk between the two sides of Peacockes Road. I regard this as overly simplistic analysis; by that logic, everything with a footpath between it could be described as well-integrated.
17. I remain of the opinion that the centre would inevitably fragment on the basis of my concerns with Peacockes Road as a severance – especially in the possible scenario of only one supermarket occurring in the short to medium terms, and that supermarket locating on the Woolworths site. But that is not the entirety of my concern. People planning to go to the supermarket would have little reason or incentive to cross to the main street area (unless they had a necessary planned trip), and vice versa. I regard this as reasonably fitting the meaning of the word fragmented and it contrasts with the PC5 intent of making as many things as conveniently connected together as possible. The emphasis placed by Mr. Sofo and Mr.

Knott on promoting visually interesting streets with commercial uses related to the supermarket that provided passive surveillance to the street would be a poor substitute to simply enabling the most superior possible centre outcome from the outset.

18. Although Mr. Brown has gone as far as to indicate that limiting development opportunity on the Woolworths site to a supermarket only might be acceptable, I understand that this outcome is not the relief that has been and still remains sought. Mr. Sofos and Mr. Knott's evidence in many instances refer to the desirability, in their respective opinions, of providing additional commercial and retail activities along with a supermarket.
19. It could be that with a general Local Centre Zone any range of commercial and retail uses (and possibly no supermarket) eventuates. Regrettably none of Woolworths' experts have assessed the situation that I understand their client has actually sought and for this reason I consider their conclusions to reflect an at-best partial analysis.
20. In my opinion the establishment of fine-grained / speciality retail on the western side of Peacockes Road would considerably undermine the intended main street and social focal point planned for the eastern side of the road and eventual link with the river. It would give supermarket visitors on the western side even less incentive or reason to try to cross Peacockes Road and its substantial additional net travel time (to the PC5 proposal) than if just a supermarket alone established on the western side.
21. Related to this topic, Mr. Brown has attempted to link centre location to geographic centrality, noting that extending the zone westwards would make it more accessible to Peacocke as a whole. This is not correct as Peacocke is much larger than a walkable catchment and in totality more people will look to access the centre by vehicle or bus than on foot. Mr. Brown's view is not consistent with contemporary centre planning

principles and on which all new centres I have been involved in over the past 15-years have occurred.

22. New centres are located where they can provide the greatest exposure and access (different and sometimes conflicting outcomes) to the most people, using all travel modes, and where the greatest amenity to create a sense of destination and place is possible (so people might want to stay longer and hence be likely to spend more). This is in all cases the highest amenity location at the confluence of movement routes on major bus routes and arterial (or collector) road networks. Examples of retail main streets and centre locations that have not occurred at (or near) the geographic centre of the catchment being served include Massey North; Hobsonville; Drury West town centre; Drury East metropolitan centre; Rotokauri North local centre; Beachlands local centre; and Mangawhai Central. In Peacocke, the optimal Local Centre location is the PC5 location – at the intersection of the high-order road network, close to the river, in a single contiguous area not bisected or fragmented by the major roads, and well-served by passenger transport services.

#### **ROTOTUNA AS AN EXEMPLAR**

23. I did not follow Mr. Knott's evidence here at all until I realised that his terminology of the 'Rototuna centre' did not relate to the actual Rototuna centre bisected by Thomas Road. He is referring to the Rototuna North centre, north of Borman Road. This distinction is relevant as the Rototuna centre is possibly one of the worst examples of an urban centre I have ever seen; avoiding an outcome as poor as that has been a motivating factor in the planning and work undertaken by HCC to date for PC5.
24. But once I had reoriented myself, I have found Mr. Knott's use of the Rototuna North centre as an example nonetheless most odd. I consider it reinforces the conclusions and concerns I have expressed, and not his own.

25. Mr. Knott has referenced a Concept Development Plan (**CDP**) for a development at Rototuna North (Figure 2, page 8 of Mr. Knott's urban design evidence). The layout he has described favourably can be directly compared with what is proposed for the PC5 centre, whereby the analogue for Peacockes Road is Borman Road. The analogue for the PC5 main street is North City Road. And both the supermarket and the main street are directly co-located with one another and where pedestrians do not need to cross a major urban arterial road corridor back and forth.
26. To make the proposition supported by Mr. Knott on the Woolworths site relevant to the Rototuna North CDP he has referenced, would require one to position the main street on one side of Borman Road and the supermarket on its opposite side.
27. The obvious difference between the Rototuna North CDP and the PC5 proposed centre concept is that the Rototuna North example has the supermarket car park facing the principal road (Borman Road), whereas the PC5 concept shows the rear of the supermarket at the principal road (Peacockes Road), and the car park within the centre. Which direction a supermarket might face is a different issue and in any event at the time of resource consent exactly how a PC5 supermarket and car park might actually come to be configured and proposed is no more certain at this time than how one on the Woolworths site might be (and would not be determinative of the land use zoning question).
28. In the alternative, if Mr. Knott is using Rototuna North as an example of what he considers could represent a (stand alone) retail development on the Woolworths Site, with Borman Road an analogue for Whatukooruru Drive and North City Road possibly an analogue for Peacockes Road, then I refer to my earlier comments regarding the need to redesign Peacockes Road substantially from its current state (in the CDP the North City Road plan has the qualities I described would be needed for Peacockes Road above in paragraph 15). Such an outcome would as I described amount to



two retail nodes in the centre, one along the planned main street and one along Peacockes Road. This can only be reasonably described as a fragmented outcome as I explained earlier.

29. In any event I cannot see how an example that contains a supermarket and retail main street close together and limited to one side of the relevant major urban arterial road compares relevantly to the proposition Mr. Knott is supporting of splitting a Local Centre Zone to sit on both sides of the relevant arterial road. In that respect I do not consider Mr. Knott's example can be used to represent the overall local centre outcome he is supportive of.

## **CONCLUSION**

30. For the reasons above I have not changed the opinions set out in my primary evidence. Expanding the Local Centre Zone westwards across Peacockes Road will result in a less efficient, less effective, and overall less appropriate urban design outcome.
31. In the event that the Panel is persuaded to agree with Woolworths, I recommend it consider restricting the activities that can occur on its site to a supermarket only.

**Ian Munro**

**22 September 2022**