

## Submission

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42, Ganges Road, Khandallah, Wellington 6035.

Our objections to the proposed extension to the Khandallah New World carpark are based on the following. They are presented here at increasing scales, from the local to the global.

### *The local scale – lack of evidence*

In the original submission document “*Assessment of Environmental Effects and Statutory Analysis 11 October 2023 Prepared for: Foodstuffs North Island Ltd*” by B&A Urban and Environmental, no evidence was presented as to the need for a carpark.

The subsequent document *Statement of Evidence of David Thomas Boersen on behalf of Foodstuffs North Island Limited – Foodstuffs Overview* dated: 15 April 2024, states (5.3:20) “This number of car parks on site is frequently unable to accommodate carpark peak demand.” Again, no evidence is presented to justify this statement in the form of a traffic survey or similar.

“Frequently unable” is an inadequate justification. Living at 42 Ganges Road, very close to the site, we walk past it frequently at all times of day. Very seldom have we ever seen the car park full on the many times we have walked past it. The last time we saw it full was just before Christmas 2023.

We often see people walking, cycling or using public transport to do their shopping but this has been dismissed in both the original submission (9.2) and the subsequent document (5.4:21) as something that rarely happens, again without evidence.

Aside from the complete lack of evidence for the need for an expanded carpark, there are obvious errors in the original submission document “*Assessment of Environmental Effects and Statutory Analysis 11 October 2023 Prepared for: Foodstuffs North Island Ltd*” by B&A Urban and Environmental. Section 5.4.4 of this submission states “Only one truck delivery with associated loading/unloading is carried out in any 15-minute period between 10pm and 7am the following day”

This statement means the intention is that deliveries, with the associated noise of trucks reversing, will be carried out all night at 15-minute intervals. This will be grossly disruptive for nearby residents. The alternative is that the statement is completely inaccurate.

The same document goes on to state “Staff arriving to the site prior to 7am via a vehicle are to park at least 10m from any property zoned residential and used for residential purposes”. The supermarket staff park in nearby streets, including in Ganges Road outside our house. Our bedroom window at no. 42 Ganges Road is 7.2m from the outer edge of the footpath. Any car parked in Ganges Road outside our bedroom is closer than 7.5 metres to our “property zoned residential and used for residential purposes”.

The submission presents no convincing evidence for the need for an expanded carpark and cannot be trusted as to its accuracy.

### *The city scale – housing versus parking*

In a time of housing shortage in Wellington this proposal to replace housing by car parking is a grotesque misuse of a valuable resource—land. Under the current district plan at least six extra houses, in addition to the three existing houses, could be added to the three plots proposed for the

new car park and consent could be sought for more. Those living in the new houses could walk to the supermarket and would also be very close to public transport.

*The global scale – the need to take a long-term view*

All of society needs to respond to the need to reduce carbon emissions to avoid severe climate change. This is particularly true for the built environment because buildings and their associated structures, such as car parking, have typical lifetimes in excess of fifty years.

To reduce carbon emissions, planning policies and outcomes should be looking to reduce private car use and increase public transport use. The International Transport Forum of the OECD in its document *Reversing Car Dependency* (ITF (2021), *Reversing Car Dependency: Summary and Conclusions*, ITF Roundtable Reports, No. 181, OECD Publishing, Paris) states (p6) “The guiding principle...is to enable citizens to carry out their daily activities without a car and not having to rely on cars to satisfy their transport needs.”

Demolishing housing to build a car park is building a piece of infrastructure for the next fifty years that is locking us into an unsustainable future by encouraging car use.

The applicant’s *Statement of Evidence* (states 5.3:30) “The store currently overtrades by our usual retail metrics in terms of sales per carpark”. This should be seen as a success rather than as a failure. Rather than building a carpark in Khandallah, New World needs to encourage its other supermarkets to reach the “retail metrics” that are achieved here.