

**Before the Independent Hearings Panel
For Wellington City Council**

Under the Resource Management Act 1991

In the matter an application for resource consent for an extension to the existing car parking area of the Khandallah New World supermarket at 26 Ganges Road, 3 Dekka Street, 31-33 Nicholson Road, Khandallah

**Statement of Evidence of Caitlin Eve Cook on behalf of Foodstuffs
North Island Limited – Landscape**

Date: 15 April 2024



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INTRODUCTION

- 1 My full name is Caitlin Eve Cook. I am an Associate and Senior Landscape Architect at Designgroup Stapleton Elliott (**DGSE**).
- 2 I am providing landscape evidence on behalf of the Applicant, Foodstuffs North Island Limited (**FSNI**).

QUALIFICATIONS AND EXPERIENCE

- 3 I hold a Masters Degree in Landscape Architecture from Victoria University, which I obtained in 2019. I also hold a New Zealand Certificate in Horticulture (General) (Level 3) from Open Polytechnic, which I obtained in 2021. I am currently a graduate member of Tuia Pita Ora New Zealand Institute of Landscape Architects (**NZILA**).
- 4 I have practiced as a landscape architect for four years, and as an industry professional for five years. I have specialised in public space, community, education, social housing, residential and commercial landscape design during these four years at DGSE.
- 5 My experience includes a range of public space and commercial projects of scales and complexity, including the following:
 - (a) Pettigrew Green Arena – Landscape and planting design for arena and carpark expansion.
 - (b) Island Bay Village Upgrades – Landscape and planting design for streetscape upgrades (currently under construction).
 - (c) Lyall Bay Junction – Landscape and planting design for industrial unit complex and carpark.
 - (d) The Quarter – Landscape and planting design for industrial unit complex and carpark.

- (e) Waimairi School – Landscape and planting design for school and carpark improvements.

CODE OF CONDUCT

- 6 I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence before the panel. My qualifications as an expert are set out above. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

SCOPE OF EVIDENCE

- 7 I am engaged by FSNI on the resource consent application for 26 Ganges Road, 3 Dekka Street and 31-33 Nicholson Road, Khandallah (expansion of the Khandallah New World Carpark) **(the Proposal)** to provide landscape design and documentation for the proposed carpark extension and additional signage. I have been a part of the landscape design team and have worked alongside the wider consultant team, to put together the documentation to obtain resource consent for the proposal.
- 8 My statement of evidence addresses the following matters:
 - 8.1 Existing landscaping;
 - 8.2 The Proposal;
 - 8.3 Mitigation of tree loss;
 - 8.4 Response to the submitters;

8.4.1 Character and amenity,

8.4.2 Tree removal

8.4.3 Biodiversity,

8.4.4 Visibility;

8.5 Response to Council's section 42A report (**s.42A report**);
and

8.6 Conclusions.

9 In preparing my evidence I have considered the following:

9.1 I have considered the subject site context with its function predominantly being a carpark and the need to provide a robust and low maintenance landscape solution.

9.2 I have reviewed the matters raised by the public submissions and have made considerations to the proposed landscaping in which I discuss below.

9.3 I have reviewed and coordinated:

9.3.1 the landscape and planting design with the resource consent documentation of Marshall Day Acoustics for the Acoustic Fencing Design,¹

¹ Marshall Day "Acoustic Report" (29 August 2022) Wellington City Council Public Notification: 26 Ganges Road, 3 Dekka Street and 31-33 Nicholson Road, Khandallah (Khandallah New World Carpark) Application Documents – Appendix 6 Acoustic Report, page 7.

9.3.2 The most recent updated landscaping design attached to my evidence as **Appendix A**; and

9.3.3 Alongside Egis (previously Calibre) the Rooding/Carpark and Stormwater Design, including the updated copy attached to the evidence of Ms Sumin Wang.²

INVOLVEMENT WITH THE APPLICATION

10 DGSE have been engaged by FSNI in relation to the Proposal since November 2021. I became involved with the project from September 2022, where I assisted the DGSE team to prepare the landscape planting design and advice for the resource consent application and this work has been completed. DGSE have been separately engaged to provide this evidence on behalf of FSNI for the purposes of this hearing.

11 I have visited the site to observe the existing landscape, streetscape, and character, with the most recent visit being 12th March 2024.

CURRENT LANDSCAPING

12 The existing site can be described as having two characters that follow the current district plan zoning. The northern portion of the site containing the existing Khandallah New World (26 Ganges Road) is typical as to what could be expected in the Centre Zone, having a large commercial building and carparking facilities with amenity and screening planting. The southern portion of the site contains various dwellings to be demolished with subsequent parking/access, service areas and amenity planting.

² Calibre "Infrastructure Report" (29 April 2022) Wellington City Council Public Notification: 26 Ganges Road, 3 Dekka Street and 31-33 Nicholson Toad, Khandallah (Khandallah New World Carpark) Application Documents – Appendix 4 Engineering Report and Plans.

- 13 Existing planting within the site can be described as a wide range of both native and exotic species, with established trees and vegetation along Dekka Street, Ganges Street and Nicholson Road. A site plan of existing vegetation can be found in the Landscaping Plans, at sheet L002, and a palette of the identified species within the site and its context can be found on sheet L601.³

PROPOSAL LANDSCAPING

- 14 The Proposal is to extend the existing carpark for Khandallah New World and install associated signage. The scope provided to DGSE as part of the landscape design was to provide planting design for the proposed layout to mitigate and soften the proposed fencing and hardscape, which was designed by the wider consultant design team.
- 15 As the project progressed, DGSE's scope extended to also providing advice and resource consent design drawings for the design of the pedestrian access path and stairs from Nicholson Road, in coordination with Egis (previously Calibre). Advice was also given to assist the placement of the fencing design in coordination with Marshall Day Acoustics, as well as general landscape advice and resource consent design drawings in coordination with other external consultants. An indicative lighting design has also recently been prepared to provide a general idea and guidance on possible site lighting locations for wayfinding and crime prevention through environmental design (**CPTED**).

³ Designgroup Stapleton Elliot "Landscaping Plans" (11 October 2023) Wellington City Council Public Notification: 26 Ganges Road, 3 Dekka Street and 31-33 Nicholson Road, Khandallah (Khandallah New World Carpark) Application Documents, Appendix 3, pages 2 and 14.

- 16 Appendix 3 of the application documents contains the proposed landscaping plans prepared by DGSE as part of the Resource Consent application.
- 17 The planting proposed as part of the resource application is a mix of native and exotic species. The varying foliage colours mitigate and soften the proposed fencing and hardscape environment of the carpark area. The planting design and palette provided as part of the initial resource consent application was influenced to a residential style, to assist the Proposal in mitigating impacts on the overall character and streetscape. Low planting and specimen trees with minimum 2m clear trunks, have been proposed to retain sightlines within the carpark and the site vehicle entries, to assist in pedestrian visibility.
- 18 The fencing proposed as part of the resource consent application provides privacy, visual, and acoustic mitigation of the carpark activity to the surrounding residents. The acoustic fencing is traditional wooden paling fencing with no spacings between the boards which is proposed to be stained black. Input was provided from the landscape architecture team into the locations of the proposed fencing, to locate positions that were able to be effectively screened by vegetation. Fencing design was undertaken by the acoustic engineer and I note that other expert evidence will address the fencing design from an acoustic perspective.

Mitigation of tree loss

- 19 The existing vegetation on site that is established or of notable recognition has been identified and proposed to be retained where possible. Protecting existing vegetation will assist in retaining the existing character as it makes up part of the existing streetscape.

- 20 The proposed planting design has been placed throughout the carpark where possible to mitigate the impact of the new hardscape.
- 20.1 The borders of the site that are adjoining residential properties all contain planting design that is of a higher density and height to provide privacy and visual mitigation to adjoining neighbours.
- 20.2 Smaller planter beds are placed at the ends of the parking bays to provide visual relief to the proposed carpark layout. These contain smaller low-level species, with the various textures and colours assisting in softening the appearance of the proposed carpark hardscape, with hardy trees included where possible to provide canopy shade and visual relief.
- 20.3 Larger pockets of planting are located at the new street entries to the carpark from Dekka Street and Nicholson Road to break up the new hardscape and soften the visual impact on the character of the streetscape.
- 21 The planting design palette is predominantly native; however, a selection of exotic species has been included. This was deemed necessary to suit the site conditions and were selected due to their already existing presence in the area.
- 21.1 An example of this is the Virginia Creeper (*Parthenocissus quinquefolia*), which is used to soften and screen the proposed retaining wall along adjoining boundaries of the carpark. As this is a south facing area, it requires hardy species as it will be predominantly shaded. The Virginia Creeper is found growing in similar conditions and therefore deemed a suitably placed species that is aligned with the surrounding environment.

- 22 The landscape planting design also adds additional specimen trees as part of the amenity planting within the proposed carparking.
- 22.1 These proposed trees have been selected to work with the surrounding environment, in line with the existing vegetation in the area. As these trees mature, they will reach a height of up to 8m (*Sophora microphylla* for example).
- 22.2 These selected trees have also been chosen to include native species where possible.
- 22.3 The proposed new trees are to be standard specimens, with clear trunks, and a 'lollipop' form with a lifted canopy, particularly where sightlines are required for pedestrian visibility.
- 22.4 Along with providing shelter and food for local birdlife, a lifted tree canopy also allows for a greater area of shade coverage and therefore can assist in cooling the hardscape of the carpark area and mitigate possible heat island effects.

RESPONSE TO SUBMITTERS

- 23 I have reviewed the matters raised in the submissions received as part of the resource consent notification process. I set out my responses to the submitters' commentary in the following groups of landscape related issues: character and amenity, tree removal, biodiversity, and visibility. I will also discuss the adjustments made to the landscape documentation since the initial resource consent application, shown in **Appendix A**.

Character and amenity

- 24 Concern has been raised by submitters about the proposed expansion potentially compromising the streetscape and character of the Nicholson Road entrance.
- 25 I consider that that the proposed landscape planting design provides a satisfactory level of mitigation considering the context of the site, that softens the hardscape and open space from the adjoining streetscape. The contrasting colours and textures of the proposed planting, as well as the change in height and massing, reduces the amount of area visible from the public streetscape, is consistent with a more residential style of planting design, and reduces the impact on the overall character effects of the area.
- 26 It is my opinion that the retention of existing trees within the area where possible will also assist in preserving the existing streetscape, as they contribute to the amenity and visual character of the surrounding area. As taller specimen trees take some time to grow, retaining the established nature of these existing species preserves an element of pre-existing character.
- 27 The plant species proposed for the initial resource consent application were carefully selected following both site visits and desktop analysis. This process provided a comprehensive understanding of the neighbouring site context and ensured that the Proposal is sympathetic and complementary to the surrounding residential environment. The proposed landscape planting design has also been further refined since the resource consent application and is discussed below.
- 28 Due to the elevation of the site, the need for screening and visual mitigation is important. The proposed planting has been designed to soften this visual impact on adjoining residential boundaries. It is considered that whilst the visual impacts may be greater in the short term, they will reduce as the planting establishes and mitigates the Proposal's impact.

29 I have provided commentary on the impact of character and amenity as a landscape architect. I note that other expert evidence will address the concerns regarding character and amenity from an urban design perspective.

Tree removal

30 Submission #63 from Ray O'Hagan expresses concern around the removal of trees and the impact that has on climate change and urban heat island effect. I acknowledge that increasing impermeable surfaces can have wider environmental impacts. The design has incorporated strategic pockets of planting with low level planting and specimen trees within the carparking where possible to reduce these impacts.

31 As mentioned earlier in my evidence, the existing established trees within the site are intended to be retained where possible. If any require removal, additional trees have been proposed as part of the planting design and includes native species where appropriate.

Biodiversity

32 There is mention in some of the submissions regarding consideration of biodiversity within the area. As mentioned earlier in my evidence, the proposed plant palette has been selected considering the local existing environment, biodiversity, and the site conditions to ensure that the planting selected is suitable and complimentary for the area.

33 Due to the setting of a proposed carpark, planting is required to be hardy, and low maintenance. Where possible, native species have been selected as they generally require less care and are well adapted to local conditions. Through native planting, this can provide 'green corridors' between larger vegetated areas for birdlife, providing food and shelter, in addition to flowering species that provide food for bees.

Visibility

- 34 A concern expressed throughout some submissions was related to traffic safety. Whilst this is not directly related to the landscape scope, and will be addressed in other expert evidence, it is worth noting that the planting design considers pedestrian visibility. Planting within the vehicle entry and exit access to the carpark is limited to lower-level planting only and have been designed with mature plant heights reaching no more than 1m high within 1.5m of the driveway edge. As noted above in paragraph 23, proposed tree specimens will be standardised, with a 'lollipop' form and clear trunk to help maintain this visibility.

Adjustments since the application

- 35 Upon review of the matters raised by the public submissions, the landscaping plan was further refined and is shown in the plans attached to this statement of evidence as **Appendix A**. Generally, this was to respond to the issues outlined above, for example proposing increased biodiversity, increased canopy shade cover and emphasis on surrounding existing planting character.
- 36 The proposed planting palette has been refined to work harmoniously both together as a holistic palette, and with connection to the immediate surroundings.
- 37 The proposed landscape planting palette has also been clarified to ensure the balance of species will benefit native flora and fauna, whilst attempting to mitigate undesirable fauna and pests (predators). The selection of species is limited to either being jagged and permeable, reducing opportunity to hide, or are too small to house nests.
- 38 The planting now also include species that provide a food source that is only desirable to intended wildlife. An example of this is the proposed planting palette using trees like Kowhai (*Sophora microphylla*) and Titoki (*Alectryon excelsus*) which allow for food

and shelter for birdlife but do not provide a desirable environment for rodents.

39 Inclusion of species that have flowering periods also ensures a more residential style of garden design. New Zealand Iris (*Libertia ixioides*) and Rengarenga Lily (*Arthropodium cirratum*) provide seasonal change when they flower. The layered bands of planting design at the entrances reference the English perennial border style of planting often found in residential settings.

40 Exotic plant species are still part of the proposed planting design; however, these have been further refined to holistically complement the proposed plant palette, and the existing surrounding environment and conditions.

40.1 Creeping fig (*Ficus pumila*) has been proposed to screen the proposed retaining walls adjoining the boundary of the carpark, as it has hardy properties that will require little to no maintenance. This substitution has lush, green foliage that will complement the rest of the proposed palette.

40.2 The Chinese Elm (*Ulmus parviflora*) is currently bordering the existing carpark and has now been included as part of the proposed planting design to assist in integrating the proposed carpark extension as part of the current layout. It is also being used in the planter beds where there is not enough soil to support native tree species, as it is tolerant to root restriction and often used as a street tree for this reason. The Chinese Elm is considered to be tolerant to higher wind exposure and therefore is placed within the planting design to withstand these winds, whilst providing shade, shelter, and visual relief.

41 Minor alterations have been made to the carpark layout at the recommendation of the Urban Designer (Mr Wallace at Barker

Associates), which has impacted the landscape design. A carpark space has been removed closest to the Nicholson Road entrance on the eastern side and replaced with low level planting and specimen trees.⁴ Upon the recommendation within Mr Michael Nixon's evidence, a raised safety platform has also been introduced at the Nicholson Road entrance to signal to drivers moving from the street into the site that this car park is a slower speed area.⁵

RESPONSE TO SECTION 42A REPORT

42 I have reviewed the Section 42A Report prepared by Amy Camilleri. I have also reviewed the Urban Design Assessment prepared by Jaime Devereux, attached as Appendix 4 to the Section 42A report. As previously outlined earlier in my evidence, DGSE's scope was limited to providing planting design for the proposed carpark layout to mitigate and soften the proposed fencing and hardscape, and therefore I note the following in response:

42.1 As noted in paragraph 100 of the S42A Report, the proposal for the Dekka Street entrance 'allows for screening by using the existing and additional vegetation that is proposed'. I agree with both Ms Camilleri and Ms Deveraux's summaries that the planting is a contributing factor in the proposal having 'a less detrimental effect on the visual quality of the streetscape along Dekka Street'.

42.2 In paragraph 102, it is noted that 'the proposed landscaping will not be sufficient to screen the double width vehicle access and carpark behind'. Whilst I agree that the proposed carpark expansion cannot be screened entirely through the vegetation, adequate

⁴ Evidence of Cam Wallace, at [31].

⁵ Evidence of Michael Nixon, at [42].

screening through planting design has been accounted for within the scope provided, whilst still adhering to traffic/pedestrian visibility constraints. In section 6 in the Urban Design Assessment, Ms Devereux has suggested an arborist report should be provided prior to construction to ensure survival of existing vegetation to be retained. I consider this appropriate and agree with this suggestion.

42.3 In section 6.2 of Ms. Devereux's assessment, it is suggested that the proposed planting on the green wall will provide some visual softening, but it will take some time to establish and has suggested various other planting methods. Whilst I agree that there are other planting strategies to provide visual mitigation, the proposal was limited on space due to the jointly owned public walkway and retaining wall structure. I believe given the site constraints provided, that the use of climbing planting is the best strategy to mitigate visual impact of the retaining walls.

42.4 It is noted that Ms. Devereux states in section 7 of Appendix 4 that 'the landscaping is considered appropriate'. Whilst there have been some amendments made to the planting palette as noted above, amendments are minor and made to respond to the concerns raised by submitters. I therefore consider the planting design remains appropriate.

CONCLUSIONS

43 In conclusion, the proposed planting and general landscape proposal has been designed to improve the overall carpark design and surrounding environment. It is my view that whilst there will be a change in character, the proposed coordinated planting and landscape design assists in mitigating these impacts

to the extent reasonable, considering the character and context of the Proposal.

Date: 15 April 2024



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Caitlin Eve Cook