

**Before the Independent Hearings Panel
For Wellington City Council
SR471670**

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

**Supplementary Statement of Evidence of Evita Caroline Key on behalf
of Foodstuffs North Island Limited – Planning**

Date: 1 May 2024



Solicitor on the Record
Contact solicitor

Stephen Quinn stephen.quinn@dlapiper.com
Mhairi Mackenzie Everitt
mhairi.mackenzieeveritt@dlapiper.com

Level 4, 20 Customhouse Quay, Wellington 6011
PO Box 2791, Wellington 6140
Tel +64 4 472 6289

+64 4 474 3217
+64 4 474 3207

INTRODUCTION

- 1 My name is Evita Caroline Key. I am a planning consultant and Senior Associate at Barker & Associates Limited. I confirm the qualifications and experience that are set out in my primary statement of evidence in relation to this resource consent application.

- 2 I have prepared this supplementary piece of evidence to further assist in the response to a question raised at the hearing by the Panel's Chair, Mr Schofield, with respect to the proposal's accordance with Policies MRZ-P13 and HRZ-P12 that specifically relate to non-residential activities in the residential zone.

NON-RESIDENTIAL ACTIVITIES

- 3 Policies MRZ-P13 and HRZ-P12 both provide for non-residential activities and include seven items which I provide commentary on below:

Support the needs of local communities

- 4 The proposal will allow the local community to park and shop for groceries and other essentials conveniently within Khandallah Village. It will also ensure that the existing supermarket is maintained within the Centre zone, increasing foot traffic for other local businesses thereby supporting the viability and vitality of the Village.

Are of an intensity, scale and design that is consistent with the amenity values anticipated for the Zone

5 The design of the car parking has been broken up into a number of smaller components that are separated by retaining walls and landscaping, which is more typical of a residential environment rather than typical large, single level supermarket car park.¹ The fencing, landscaping design, and planting palette, with contrasting colours and textures, is consistent with a residential style of planting design.² These design and landscaping features assist in managing the intensity and scale of the proposal to ensure that it is appropriately integrated within the surrounding residential environment. This enables general consistency with the amenity values anticipated for the neighbourhood and zone.

Contribute positively to the urban environment and achieve attractive and safe streets

6 The proposal will contribute positively to the urban environment though the incorporation of specimen trees and landscaping around the perimeter and within the car park. The inclusion of a pedestrian walkway from Nicholson Road though to the supermarket will provide a clear and safe pedestrian access route. The traffic effects have been assessed by both Foodstuffs and the Council's experts as acceptable³ and, subject to appropriate conditions of consent, will not have any significant adverse safety impacts on the surrounding streets.

¹ Evidence of Mr Cameron Wallace, at [54]

² Evidence of Ms Caitlin Cook, at [25], [27] and [39]

³ Evidence of Mr Michael Nixon and Mr Haran Arampamoorthy

Reduce reliance on travel by private motor vehicle

- 7 It is important to acknowledge that supermarkets attract large volumes of customers, who make regular visits to purchase significant quantities of groceries and other household items. The need to transport large quantities of goods from the supermarket means that the private vehicles are typically the most practical and preferred means of travel for many. The use of public transport, walking and cycling is typically only feasible for smaller shops.

- 8 Notwithstanding, the proposal does include the following measures to aid in reducing reliance of the use of private motor vehicles:
 - 8.1 The proposal includes a pedestrian walkway from Nicholson Road through to the supermarket. Given the more direct access this will provide to those in the Nicholson Road area, this walkway is expected to encourage more people to walk to the supermarket, thereby reducing their reliance on private motor vehicles for smaller grocery shops.

 - 8.2 Upon further consideration, Foodstuffs has agreed to provide at least eight additional bicycle parking spaces on the site which will be covered. A suggested additional condition of consent will be provided to secure this.

- 9 Furthermore, the Village location ensures that multiple visits to shops and services in the area are supported and transport is optimised. There is an existing bus stop directly adjoining the supermarket and Khandallah train station is a 10 minute walk from the site.

- 10 It is also important to acknowledge the role that local government has in reducing reliance on private motor vehicle travel. These include improvements to the public transport frequency, provision of pedestrian paths on both sides of street, and provision of cycling infrastructure, all of which Foodstuffs has no control over.
- 11 Lastly, whilst not directly part of this proposal, Foodstuffs promotes customer uptake of on-line order/delivery which optimises the delivery of groceries to customers and reduces travel to the supermarket via private vehicle.

Maintain the safety and efficiency of the transport network

- 12 The proposal will not generate any additional traffic movements as the supermarket floor area is not being altered. Subject to the Nicholson Road access operating as left in/left out only, monitoring of the Dekka Street access, and preparation of a construction and traffic management plan to manage construction traffic, it is considered that the proposal can maintain the safety and efficiency of the surrounding road network.⁴

Will be adequately serviced by three waters infrastructure or can address any constraints on the site

- 13 Stormwater runoff from the proposal will be discharged at two locations being the kerb along Dekka Street or piped to a 4.2m³ underground detention tank at the Nicholson Road access. This

⁴ Evidence of Mr Michael Nixon

detention will ensure that there are no adverse downstream effects on the surrounding environment and neighbouring properties.⁵

Are integrated into residential developments where possible

14 This particular part of the policy is not applicable as the proposal does not include any residential component.

CONCLUSION

15 Based on the above, I am of the opinion that the proposal is not inconsistent with Policies MRZ-P13 and HRZ-P12 that relate specifically to non-residential activities.

Date 2 May 2024



Evita Caroline Key

⁵ Evidence of Ms Sumin Wang