

**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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**SUPPLEMENTARY STATEMENT OF EVIDENCE OF GREGORY MICHAEL  
AKEHURST**

**Dated 11 October 2022**

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## INTRODUCTION

1. My full name is Gregory Michael Akehurst.
2. I prepared a statement of evidence dated 2 September 2022 (**primary statement**) and a rebuttal statement of evidence dated 21 September 2022 (**rebuttal statement**) on behalf of Hamilton City Council (**HCC**) in relation to economic matters that arise under Proposed Plan Change 5 (**PC5**).
3. My qualifications and experience are outlined in my primary statement of evidence. I provide this supplementary statement of evidence (**supplementary statement**) on behalf of HCC as proponent of PC5.
4. I reaffirm my commitment to adhering to the Code of Conduct for Expert Witnesses contained in the Environment Court's Practice Note dated 1 December 2014.
5. My brief supplementary evidence responds to the summary statement of evidence presented in the hearing by Mr Tim Heath on 29 September 2022, on behalf of Woolworths New Zealand Ltd (**Woolworths**).

### Centre Size errors

6. In my rebuttal statement, I identified an error in Mr Heath's use of 40% retail demand retention that he says comes from the 2020 M.E Report and is potentially focused on the local centre. It is clear in that report that the level of retail retention is around 21%. Mr Heath's inclusion of non-retail components in his estimate of retail capture invalidates his estimate. He then compounds this error by increasing his capture rate to 50% (in line with the CBD or large sub-regional centres) with no evidential basis for doing so.

7. In my view little weight can be given to Mr Heath's estimates because of these errors.

**Areas of Agreement: Local Centre Zoned Land Requirement**

8. However, these errors do not impact on the outcome, which is that he agrees that 20,000m<sup>2</sup> GFA cap on commercial activity is appropriate for the suburban centre, or local centre in this location. He also agrees that the estimates of total supermarket demand will eventually sustain two supermarkets.
9. Additional zoned local centre land is not needed to accommodate 20,000m<sup>2</sup> GFA or two supermarkets, as the current centre at 7.8ha is more than sufficient to accommodate both the projected centre size as well as a larger centre based on an increased centre role and higher dwelling yield.
10. Mr Heath agrees that additional land is not required for the local centre. His position is that the centre needs to reorient itself around Peacockes Road, to include the Woolworth's site on the western side.

**Areas of Disagreement: Supermarket Location**

11. Mr Heath considers that the Woolworths site provides a favourable location for a supermarket based on the efficiency of the site for the supermarket operator and the Euclidian distance of the supermarket to the proposed centre mainstreet area. He considers that Peacockes Road is the centres "critical asset" (para 4). This appears to be at odds with the Urban Designer's position that Peacockes Road potentially severs the location in to two parts.

12. His position is that none of the Woolworths experts believe Peacockes Road is a barrier and that with a supermarket to the west, the centre remains permeable and accessible.
13. His position that the centre is better off with Woolworths on the western side is based on his view that the supermarket will achieve a higher level of sales. He provides no analysis to support this, but he states that with a higher turnover supermarket, there are more customers and therefore more shoppers to the centre overall.
14. In his evidence he makes no evaluation of supermarket turnover potential on either side of Peacockes Road, he simply makes the statement.
15. In my view, there are no constraints about the location of a supermarket on the area zoned Local Centre in the notified version of PC5 on the eastern side of Peacockes Road (**PC5 Local Centre land**). Therefore, there is nothing stopping an outcome where the supermarket has street frontage on Peacockes Road, on the return journey side, with left turn access to traffic. This ease of access along with integration with other shops and services and an easy exit will see a supermarket performing just as well on the PC5 Local Centre land as on the Woolworths site.
16. I understand that it may cost Woolworths less to develop on land they own, so they will be more profitable, but they will not necessarily turnover more on their site.
17. It is not clear from Mr Heath's evidence how a higher turnover at Woolworths on the western side of the road leads to higher levels of activity on Main Street in the east. Especially given his statement in paragraph 18 of his statement of evidence that shoppers want to get into the supermarket, do their shopping and leave. They do not want to "meander about" as this is inconvenient.
18. He cannot hold both these positions at the same time.

19. Finally, locating a supermarket on the western side and one on the east doubles the amount of carparking required. This reduces land use efficiency and makes the centre as a whole less vibrant, walkable and permeable.
20. As the urban designers have stated, splitting the centre across Peacockes Road leads to reduced activity in the centre overall. From an economic perspective this leads to lower levels of vibrancy, vitality and efficiency.

### **CONCLUSION**

21. It is difficult to formally analyse Mr Heath's position, as there is no empirical or modelled analysis to support his position and the claims he makes.
22. However, nothing I have read in Mr Heath's supplementary statement has caused me to alter my opinion that the Woolworths site to the west of Peacockes Road should not be included as part of the Local Centre Zone as it represents an inefficient use of resources and has the potential to lead to significant adverse effects on Hamilton's centre hierarchy and the city centre in particular.

**Gregory Michael Akehurst**

**11 October 2022**