

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER

**of the Proposed Plan Change 5 ("PC5") to the
Hamilton City Operative District Plan**

**SUMMARY STATEMENT OF RICHARD KNOTT ON BEHALF OF
WOOLWORTHS NEW ZEALAND LIMITED**

URBAN DESIGN

28 SEPTEMBER 2022

1. INTRODUCTION

Introduction

- 1.1 My name is Richard John Knott. My qualifications and experience is as set out in my evidence in chief dated 16th September 2022. I again confirm that I agree to comply with the Environment Court Code of Conduct for Expert Witnesses 2014.
- 1.2 This Summary confirms the key points as set out in my evidence in chief and also responds to matters raised by Mr Munro in his rebuttal evidence.

2. SUMMARY

- 2.1 An appropriately located supermarket can act as an 'anchor' store' that attracts shoppers to a local centre. Current good practice for the design of malls and retail centres is to locate 'anchor' stores on the edge of the development directly adjacent to the car parking, to attract shoppers into the centre and to provide 'streets' of finer grained retail development which links these.
- 2.2 It is important to ensure that a supermarket is situated in a location that is easily accessible by car and heavy vehicles but also in a location where shoppers can easily connect to the wider local centre.
- 2.3 In my experience the operational and functional requirements for a new supermarket, such as the design and internal layout of the supermarket itself, safe servicing arrangements, easily accessible customer car parking and good visibility of the supermarket building, are best achieved when a supermarket is located on the periphery of a Centre.
- 2.4 In relation to the Local Centre in the Peacocke Structure Plan area, providing the anchor supermarket and associated car parking on the western edge of the centre will attract shoppers to the area and will also discourage traffic extending any further into the Local Centre than is necessary. This will ensure the centre is a safe area for pedestrians and cyclists and in turn will increase the attractiveness and desirability of the centre as a place to shop and invest. Such a location also satisfies functional and operational requirements.
- 2.5 A supermarket at the eastern edge of the proposed Local Centre would not meet these functional requirements, as it would not be highly visible from Peacockes Road, would be screened by future development located between

it and Peacockes Road, would require shoppers and heavy vehicles to travel through the local centre to reach the associated car parking and would not be an ideal outcome adjacent to the open space; potentially providing little activation to the space.

- 2.6 A supermarket shown in the location illustrated on the Local Centre Concept Plan would deliver equally poor design outcomes, including likely solid fences and poor passive surveillance along the Peacockes Road frontage resulting from the location of the service area adjacent to this. This would be out of step with the intention to front Peacockes Road with residential development to the north and south of the Local Centre (as granted as part of the Weston Lea consent).
- 2.7 Levels across the Woolworths site are relatively flat. However, land to the east of Peacockes Road, proposed to be zoned Local Centre in PC5, dips and rises such that views along the "Main Street" would be above the open space to the east of the Local Centre rather than of it. The river is around 30m below the level of Peacockes Road and would not be viewed along the Main Street.
- 2.8 From my experience, and from my discussions with Mr Sofo, I consider that the Woolworths site can be developed in a way which meets the requirements of the "1.4.10 Peacocke Local Centre Design Guide".
- 2.9 I consider that the anticipated low speed street environment and proposed signalised intersection will provide high quality, safe connections between the significant areas of residential land to the west of Peacockes Road and the Woolworths land with the remainder of the local centre to the east of Peacockes Road.
- 2.10 Providing retail use on the Woolworths site presents an opportunity to develop an integrated centre, where the school is read as being an integral part of the local centre, fronting the retail development on the Woolworths site. This provides greater reason to encourage the school to provide an active frontage to the street, in the same way that new schools such as Ormiston Senior College, Auckland, front the street.
- 2.11 From an urban design perspective, I consider that street fronting development on the Woolworths site will offer potential activation of the street to the northern site frontage and to the area around the intersection of the two minor arterial roads. This will contribute to the character of the Local Centre not take away from it. Street fronting will also contribute to the quality of the provided

connectivity through the local area and help to deliver a more legible Local Centre, without taking away from the 'main street'.

3. RESPONSE TO REBUTTAL EVIDENCE OF MR MUNRO

- 3.1 Mr Munro¹ suggests that a supermarket within the Council PC5 area is superior proposition to a supermarket on the Woolworths site as it will give a shopper more convenient access to the main street. This is based upon his proposition² that '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...'
- 3.2 I do not agree with this view. It is my understanding that the intention is that future residents of Peacockes 'shop local'. A typical shopper visiting the local centre will be familiar with the centre and will know before they arrive whether it is their intention to visit only the supermarket or whether they also intend to visit other shops as part of the same trip. It is not a case of 'enticing' them to do this but ensuring that there are appropriate linkages which enable this should they so wish.
- 3.3 A shopper wishing to move from the Woolworth site to the PC5 main street will be in no different position to a shopper arriving on foot from the large residential catchment to the west of Peacockes Road. If it is as inconvenient to cross Peacockes Road as suggested by Mr Munro³ the Council will have failed to achieve its own aspiration of providing easy pedestrian access to the Local Centre. In any event the additional 2 to 3 minutes pedestrian travel time suggested by Mr Munro (and also referenced by Mr Bredemeijer⁴) to access the full length of the of the main street would likely represent a negligible increase in 'shopping time' for most shoppers and I do not believe that it would discourage them from accessing other shops from the Woolworths site. On this basis I do not believe that Peacockes Road would need the significant redesign suggested by Mr Munro to allow pedestrians to more readily move back and forth.
- 3.4 I am puzzled by Mr Munro's suggestion⁵ that new centres are located where they can provide the greatest exposure and access to most people using all travel modes. He provides examples of centres which have not occurred at

¹ Rebuttal Evidence Mr Munro Paragraph 13

² Rebuttal Evidence Mr Munro Paragraph 11

³ Rebuttal Evidence Mr Munro Paragraph 14

⁴ Rebuttal Evidence of Mr Bredemeijer Paragraph 21

⁵ Rebuttal Evidence Mr Munro Paragraph 22

the geographic centre of their catchment. Related to this, Mr Bredemeijer⁶ notes that I do not suggest that the mainstreet and the entire local centre be moved or question the suitability of the current LCZ land for a supermarket. I believe that this misses the point; the fact is that placing the Local Centre off centre and adjacent to a large area of open space, within which no one will live, has not maximised its accessibility. This is particularly pertinent to pedestrians and cyclists who would likely most benefit from a more central location. I do not believe that the location close to the open space⁷ will necessarily assist with creating a sense of destination or place; in the case of the local centre I consider that this is more influenced by the overall design of the centre as a whole. The location of the proposed bus stops to the north of centre on Peacockes Road is equally convenient to the PC5 Local Centre area and the Woolworths Land.

- 3.5 In relation to Mr Munro's comment regarding my use of Rototuna Town Centre as an exemplar, I confirm that my reference is to Rototuna Town Centre (as covered by Chapter 13 – Rototuna Town Centre Zone of the ODP). In any event, I think Mr Munro has misunderstood my reason for including it as an example. I fully recognise that it is not fully analogous to the Woolworths land relative to the PC5 land, but nevertheless it illustrates how a supermarket on the Woolworths land could be developed with good pedestrian linkages to the proposed east-west road whilst also providing a car park which is visible from Peacockes Road (an arrangement which meets the functional and operational requirements of a supermarket whilst being visually more satisfactory than the layout illustrated on the Local Centre Concept Plan).

4. RESPONSE TO REBUTTAL EVIDENCE OF MR BREDEMEIJER

- 4.1 I note that Mr Bredemeijer suggests that including the Woolworths site in the local centre will result in a weaker design outcome for the centre as a whole.⁸ I do not consider that Mr Bredemeijer has clearly articulated why the 'design outcome' is weaker. In my view, the extended area will, as a whole, be capable of being designed in a manner which delivers a well functioning, efficient, attractive local centre which meets the aspirations of the Peacocke Local Centre Design Guide.
- 4.2 In relation to the similarity between Mr Bredemeijer's suggested supermarket layout and the Countdown at Rototuna Town Centre, the Countdown Rototuna

⁶ Rebuttal Evidence of Mr Bredemeijer Paragraph 8

⁷ Also referenced in Rebuttal of Evidence of Mr Bredemeijer Paragraph 9

⁸ Rebuttal Evidence of Mr Bredemeijer Paragraph 7

service yard is located to the side of the building, with only a small frontage to the street, where as Mr Bredemeijer's layout illustrates the service yard as a large, dominant feature along the Peacockes Road frontage of the site.⁹

- 4.3 Mr Bredemeijer¹⁰ comments on the likely outcome of the development of the Woolworths site and that this is likely to present a blank wall to Peacockes Road and a service area to the street along the southern boundary (likely opposite or adjacent to residential neighbours), and that he cannot see how from an urban design perspective this is superior to the concepts attached to his Evidence in Chief. There are a number of examples where the side elevations of Countdown supermarkets have been designed to provide an attractive frontage to streets; in Hamilton this includes Countdown Bridge Street and Countdown Claudelands. The appearance of these elevations is significantly more attractive than examples where a service yard provides a frontage to a street (such as New World Te Rapa).
- 4.4 Mr Bredemeijer suggest that the retail 'sleeving' along the northern boundary of the Woolworths will take away GFA that should be used to populate the main street and surrounding LCZ areas¹¹, I consider that whilst linked to urban design matters, Mr Heath is best placed to respond to the impact of this upon the take up on space on the main street.
- 4.5 I think that Mr Bredemeijer¹² has too literally interpreted my comments in relation to the supermarket being opposite the school; as described in my evidence I consider that active uses should front the street. It was not my intention to suggest that the supermarket itself front the street. In relation to such an arrangement encouraging the school itself to front the street, I consider that this arrangement will provide the impression that the school site is an integrated part of the town centre and will provide the Council the opportunity to push for the school building to be brought forward to the street. This would likely benefit the appearance and provide greater gravity to the local centre as a whole.
- 4.6 Whilst I accept Mr Bredemeijer's¹³ up to date knowledge of the likely access arrangements for dwellings fronting Peacockes Road, I assume that in line with urban design good practice these dwellings will still 'front' the street, and therefore stand by my view that providing the service area of a supermarket along this frontage will result in a poor design outcome, out of step with the

⁹ Evidence of Mr Bredemeijer Paragraph 16

¹⁰ Rebuttal Evidence of Mr Bredemeijer Paragraph 14

¹¹ Rebuttal Evidence of Mr Bredemeijer Paragraph 17

¹² Rebuttal Evidence of Mr Bredemeijer Paragraph 18

¹³ Rebuttal Evidence of Mr Bredemeijer Paragraph 22

intention to front Peacockes Road with residential development to the north and south of the Local Centre.

5. CONCLUSION

5.1 There have been no matters raised in the evidence of other witnesses which causes me to alter my view regarding the appropriateness of the Woolworths proposal. Overall, I consider that the effects of rezoning Woolworths' land to Local Centre will be positive from an urban design perspective.

5.2 Locating a supermarket on the western side of Peacockes road will allow for greater visibility and ease of access for customers. These are fundamental requirements that make a successful supermarket and therefore a successful anchor for the centre. It will also create strong linkages and integration between residential land and the eastern side of Peacockes Road. It will enable the success of the proposed the town centre.

Richard Knott

28 September 2022