

**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

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

**URBAN DESIGN**

**16 SEPTEMBER 2022**

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## 1. INTRODUCTION

### Background and experience

- 1.1 My name is Richard John Knott. I hold a Master of Arts in Urban Design from the University of the West of England, UK (1995). I also hold a Bachelor of Arts in Town and Country Planning (1988) and a Bachelor of Planning (1989) from the University of Manchester, UK, and a Post-Graduate Diploma in Building Conservation Bournemouth University, UK (2002).
- 1.2 I have been elected as a full member of the following professional institutes:
- (a) Member New Zealand Planning Institute
  - (b) Chartered Town Planner (Member of the Royal Town Planning Institute, UK)
  - (c) Member Institute of Historic Building Conservation (UK)
  - (d) Member Institute of Highway Engineers (UK)
- 1.3 I am a Making Good Decisions Certificate Holder (since 2010 and last renewed in 2021 with Chairing Endorsement) and have sat as Independent Planning Commissioner (panel member and/or Chair) for Hamilton City Council, Whangarei District Council, Taupo District Council, Tauranga City Council, South Wairarapa District Council and Auckland Council on over 40 hearings. I often sit on Hearings Panels where specialist urban design, special character or heritage expertise is required.
- 1.4 I have more than 33 years' experience working in the areas of urban design, heritage and planning.
- 1.5 I am familiar with the Peacocke area having been a member of the Independent Hearings Panel which considered and determined the application by Weston Lea Limited for land use and subdivision consents on the land to the east of the Woolworths site (including part of the local centre area, which was as part of that consent shown as superblocs). This decision did not include the Woolworths New Zealand Limited ("**Woolworths**") land.
- 1.6 I am also very familiar with Hamilton in general having recently prepared the Hamilton City Historic Heritage Area Assessment for Hamilton City Council (part of Plan Change 9). From 2014 to 2017 I designed the new town centre,

and comprehensive development plan for Rototuna Town Centre for Hamilton City Council and Kirkdale Developments.

1.7 My work outside of Hamilton has included designing and leading a wide range of projects, including masterplans/development frameworks for existing urban sites and greenfield areas through to providing advice for individual owners on their proposals to make alterations to their individual heritage home. These projects include:

- (a) Urban designer for a number of residential, commercial and supermarket/local centre developments across New Zealand including Palmerston North, Hastings, Te Atatū, Wainuiomata, Kapiti, Lincoln, Hāwera and Mosgiel for Woolworths and/or individual landowners
- (b) Lead Masterplanner for the Taumarunui | Manunui Spatial Plan – Ruapehu District Council (with Ree Anderson Consulting)
- (c) Lead Masterplanner for Featherston Masterplan Plan – South Wairarapa District Council (with Ree Anderson Consulting)
- (d) Designing and authoring a Framework for Action, a masterplan for the Papakura Metropolitan Centre – Papakura Local Board
- (e) Designing and authoring a masterplan for Ōpōtiki Town Centre – Ōpōtiki District Council
- (f) Designing and authoring a masterplan for Ōpōtiki Harbour and Wharf – Ōpōtiki District Council (with The Goodfellow Group)
- (g) Designed and authoring a strategy for regeneration and development in Manurewa town centre – Manurewa Local Board
- (h) Designed and authored The Lakes Masterplan in Foxton Beach – Horowhenua District Council (not yet published)
- (i) Urban designer for a number of greenfield and brownfield residential developments and mixed use developments in Auckland

#### **Code of conduct**

1.8 I confirm that I have read the Code of Conduct for Expert Witnesses 2014 contained in the Environment Court Practice Note and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware

of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

## **2. DESCRIPTION OF THE SITE AND EXISTING ENVIRONMENT**

2.1 Whilst already zoned for development and with consents in place for some urban development in the local area, the Peacockes area and its local surroundings are all currently rural, with open pasture and a range of farm buildings and lifestyle residential development along Peacockes Road. Peacockes Road remains a rural road, with a narrow carriageway, no kerbs or channels. The road is on the whole contained by planted frontages.

2.2 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 to a point around 80m east of Peacockes Road, where it is higher than Peacockes Road. Based on contour data this appears to be only around 0.5 to 1m above the level of Peacockes Road, however this rise is noticeable and would limit views along the proposed "Main Street" towards the open space beyond. The open space area is within a steep gully. Views along the "Main Street" would therefore be above the open space rather than of it. The river is around 30m below the level of Peacockes Road and would not be viewed along the Main Street.

## **3. SUPERMARKET AS AN ANCHOR IN A LOCAL CENTRE**

3.1 An appropriately located supermarket can act as an 'anchor' store that attracts shoppers to a local centre. The extent to which these shoppers will visit other shops in the local centre as part of the same trip is discussed by Mr Heath in his evidence, who notes:

Supermarkets act as anchor tenants for centres to give weight and credibility to a centre as a commercial destination which other retailers can potentially benefit off (if they are good enough), and assist the centre performing its role and function in the hierarchy. This secures the 'place' of the centre in the minds of local shoppers and entrenches / reinforces shopping travel patterns of local residents.<sup>1</sup>

3.2 In view of the above, current good practice for the design of malls and retail centres is to locate 'anchor' stores, such as a department store or a supermarket on the edge of the development directly adjacent to the car

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<sup>1</sup> Paragraph 19 Statement of Evidence of Tim Heath, 16 September 2022.



will bring enhanced centre visibility/profile, improved centre accessibility, increased diversity of business location choice, improved integration with high density residential, better balance of economic function and more efficient operation of a convenience centre.<sup>2</sup>

3.8 The overall design of a supermarket site is subject to a number of operational and functional requirements that need to be considered to ensure the success of the supermarket, and in turn the maximum benefit to the Local Centre as a whole. Such operational and functional requirements include the design and internal layout of the supermarket itself, safe servicing arrangements, easily accessible customer car parking and good visibility of the supermarket building.

3.9 In my experience these operational and functional requirements are best achieved when a supermarket is located on the periphery of a Centre; a further benefit to locating the supermarket on the edge of the Local Centre.

3.10 In the case of the proposed local centre, the eastern edge is remote from Peacockes Road, and located adjacent to the steep gully/open space. Providing an anchor store at the eastern edge of the proposed local centre would not be ideal for the following reasons:

(a) The eastern edge is not highly visible from Peacockes Road and will be screened by future development located between it and Peacockes Road.

(b) Traffic (shoppers and heavy vehicles) would need to travel through the local centre to reach the associated car parking

(c) The provision of a large supermarket building is not an ideal outcome adjacent to the open space; potentially providing little activation to the space.

3.11 I have also considered the suitability of other sites within the Local Centre for a supermarket. To assist my consideration of this matter I have referred to the Peacocke Local Centre Concept August 2022 included in the Planning, Retail Economics and Urban Design (Local Centre) Joint Witness Statement and prepared by Urbanismplus.<sup>3</sup>

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<sup>2</sup> Paragraph 40, Evidence of Tim Heath, 16 September 2022.

<sup>3</sup> Plan Change 5 to the Hamilton City Council District Plan, Joint Witness Statement (JWS) in relation to: Planning, Retail Economics and Urban Design (Local Centre), 25 August 2022.

- 3.12 The Local Centre Concept Plan illustrates the potential poor design outcome which could result if care is not taken with selecting the location and site layout of a supermarket.
- 3.13 Whilst I recognise that the majority of Peacockes Road has not been recognised as a primary or secondary frontage, I consider that providing the service area of the supermarket along this frontage will result in a poor design outcome, likely requiring tall solid fences and dense landscape planting to the street. This will 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). The effect of this would be somewhat like the experience of driving past St Lukes Mall in Auckland, where it is possible to pass by without having an appreciation that the mall is even there and would provide very poor passive surveillance of the shared pedestrian/cycle path which I understand will be along Peacockes Road.<sup>4</sup> It would not contribute to achieving the enhanced centre visibility/profile that Mr Heath points out is an economic benefit which would be delivered by the Woolworths site if it was zoned as part of the Local Centre.<sup>5</sup>
- 3.14 These operational and functional supermarket requirements are considered in greater detail through the evidence of Mr Sofo, which includes application of these requirements to Woolworths' site.<sup>6</sup>
- 3.15 As set out above, the Rotorua Countdown supermarket was located on a site at the south of the centre, with both the supermarket building and car park clearly visible from the east-west Borman Road but with strong pedestrian connections to the new main street (developed along the north-south New North Road). This arrangement provides simple access and parking for supermarket shoppers without the need for them to use the new main street (which is a low speed environment) whilst also encouraging shoppers to visit the main street shops and cafes. From a recent visit to this area, there appears to be high tenancy rates in the main street shops, illustrating the synergy.

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<sup>4</sup> As referred to in Amberfield Peacocke, Hamilton - Urban Design Report, Urbanismplus, May 2018.

<sup>5</sup> Paragraph 40(a), Evidence of Tim Heath, 16 September 2022.

<sup>6</sup> Evidence of John Sofo, 16 September 2022.



Figure 2: Extract from Rototuna CDP, showing Supermarket labelled (1), Main Street in the location of (7) and (9) and Borman Road running east-west at bottom of image.

3.16 The "1.4.10 Peacocke Local Centre Design Guide" provides advice for the design and location of a supermarket in the Centre:

Provide for supermarket(s) away from the main street where:

- The design of the building provides an active frontage to the street by locating a pedestrian entrance from an identified frontage, or the use of sleeving of large buildings by smaller retail activities to interface with the street (dependent on location of the supermarket).
- The architectural design of any supermarket responds to, and is in keeping with, the character and identity of the Peacocke Centre.
- Parking and loading is located away from identified primary and secondary frontages.

3.17 From my experience, and from my discussions with Mr Sofo, I consider that the Woolworths site can be developed in a way which meets these requirements, the functional and operational requirements of a supermarket and benefits the Local Centre as a whole.

3.18 Importantly, a supermarket development on the Woolworths site is capable of achieving all of the Design Guide requirements, in that:

- (a) A supermarket building could be accommodated on the site, away from the "main street".
- (b) A clear pedestrian route could be provided to the supermarket building from the main street.
- (c) The design of the supermarket could respond to the character and identity of the Peacocke Centre (albeit that the functional and

operational requirements of the supermarket will also need to influence the design of the development).

- (d) The parking and loading could be designed so that they are not dominant features on any identified primary and secondary frontages.

#### **4. ACCESSIBILITY AND CONNECTIVITY**

4.1 The Peacocks Local Centre Design Guide has the aim to:

Achieve a high level of walking and cycling connectivity allowing people to move to and through the Local Centre. Of particular importance is ensuring clear, safe and direct access from the surrounding residential areas and the green network and provision of safe crossing facilities that tie in with public transport stops and any school that may be located in the vicinity. It is important that the design considers how the centre can be accessed and used by people of all ages and abilities.

4.2 The site fronts both Peacockes Road and the proposed east-west road illustrated on Figure 2-3b: Peacocke Structure Plan – Peacocke Local Centre Concept. Both roads are identified as minor arterials.

4.3 It is significant to note that both roads are also identified as minor arterials in the ODP, with the Woolworths land being identified as being within the Centre, which in the ODP extends to both sides of Peacockes Road.

4.4 The fact that the Local Centre extends to both sides of the Peacockes Road in the ODP suggests that the Council does not consider that Peacockes Road would be a barrier to movement through the Local Centre.

4.5 In order to achieve the high quality connectivity aspired to by the Design Guide, there will be crossing facilities for pedestrians and cyclists at the intersection of the two minor arterial roads.<sup>7</sup> The objectives and policies for the Structure Plan area refer to the creation of a low speed environment and I note that the Hamilton City Council Speed Management Plan version 2 July 2022 identifies Peacockes Road as being suitable for a 40km/h speed limit,<sup>8</sup> recognising its role as a residential street (noting that the Weston Lea consent shows residential development fronting Peacockes Road to both the north and south of the Local Centre).

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<sup>7</sup> My understanding is that the intersection of the western arterial with Peacockes Road will be a signalised intersection and that Peacockes Road will provide footpaths and shared paths.

<sup>8</sup> Speed Management Map, Speed Management Plan Version 3 Hamilton City Council July 2022.

4.6 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.

## 5. INTEGRATION

5.1 The structure plan identifies a potential school in the north west quadrant of the intersection. As proposed in PC5, the Woolworths site would be developed for medium density residential development. I consider that the proposed PC5 zoning would result in the school not appearing or operating as an integrated part of the Local Centre. I consider that this is a missed opportunity, as the activity associated with the school could add to the vibrancy and vitality of the Local Centre.

5.2 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.

5.3 I note that there is a difference of opinion between myself and Mr Munro for Hamilton City Council regarding the benefits of having street fronting development on the Woolworth site. Mr Munro indicates in the Urban Design technical report dated 26 August 2022 that:

If a material portion of that retail was repositioned westwards there is a potential for the main street to 'run out of steam' before arriving at that eastern destination. That would in my opinion represent a substantial diminishment in the quality of the PC5 local centre outcome. This should be avoided, and it leads me to the view that if the Woolworths submission was accepted, restrictions should be imposed preventing retail activities other than a supermarket from locating on the western side of Peacockes Road.<sup>9</sup>

5.4 I believe that Mr Heath is better placed to comment on the matter of retail viability than I am able. 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

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<sup>9</sup> Plan Change 5 Post-Submissions Technical Evaluation: Urban Design (Urban Centre) Submissions, Ian Munro, 26 August 2022, appended to Statement of Evidence of Ian Colin Munro, (Urban Design – Local Centres), 2 September 2022.

of the Local Centre. 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'.

5.5 I consider that providing some limited elements of activation to the northern frontage of the Woolworths site and at the intersection of the east-west minor arterial will assist with creating a more interesting environment for pedestrians. Uses which could achieve this could include facilities such a medical centre, which would not be expected to front the Main Street to the east of Peacockes Road.

5.6 Notwithstanding this, I do not consider that it is necessary to provide such buildings/uses along the full extent of the north site frontage or east site frontage of the Woolworths site, but rather just at the intersection of the two minor arterial roads and for a limited section of the north frontage extending from this. Providing such uses along the full length of the Woolworth site's north and east street frontages would reduce the visibility and exposure to passing traffic of the supermarket and its car park, limit the potential for the supermarket to contribute to 'anchor' the centre in the minds of local shoppers and entrench/reinforce the shopping travel patterns of local residents as discussed by Mr Heath.

## **6. SECTION 42A REPORT AND COUNCIL EVIDENCE**

6.1 I have reviewed the Council's section 42A Hearing Report dated 2 September 2022 as well as the Joint Witness Statement in relation to Planning, Retail Economics and Urban Design (Local Centre) dated 25 August 2022 with particular regard to the Statement of Evidence of Ian Munro and urban design Technical Report prepared by Mr Munro and the Statement of Evidence of Greg Akehurst.

6.2 In my opinion:

- (a) Mr Munro overstates that the arterial roads will be a barrier to cross and has the potential to create semi-isolated commercial "islands". Given the Design Guide seeks to achieve high-quality connectivity for cyclists and pedestrians by creating an accessible, walkable neighbourhood, there will be crossing facilities for pedestrians and cyclists at the intersection of the two minor arterial roads.<sup>10</sup> This

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<sup>10</sup> Appendix 1 – District Plan Administration Design Guide, page 164.

helps to overcome Mr Munro's concern of the arterial roads as a barrier.

- (b) Mr Munro overstates the potential for a local centre zoning on Woolworths' site to fragment the Local Centre. Woolworths is not looking to undermine the Local Centre, but rather to ensure an accessible supermarket is designed to anchor the Centre. I note, Mr Munro accepts that the Woolworths' site is a "desirable" place for a supermarket if it was considered to be a stand-alone commercial use in his technical report dated 26 August 2022. While I consider some activation of the corner of Woolworths site would be positive (eg a medical centre), this will not "fragment" the Local Centre or take away from the retail sites in the Local Centre.
- (c) Mr Munro is concerned with the expansion of the centre, and fears that the opportunity of a "location for a high-amenity vista" will be lost.<sup>11</sup> I disagree with this. The Adare local centre land is undulated with limited views from the main street of the proposed PC5 local centre towards the open space and river. The idea presented by Mr Munro of a walk through the main street with views down to the river is somewhat overstated.
- (d) Mr Akehurst indicates that 'that splintering the centre across Peacockes Road will result in a sub-optimal outcome as it becomes more difficult to carry out multipurpose trips at the centre without driving across the intersection, once supermarket shopping is completed, in order to access the fine grained retail to the east'.<sup>12</sup> As noted above 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. Shoppers will be easily and safely cross the intersection on foot to access the fine-grained retail to the east.

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<sup>11</sup> Plan Change 5 Post-Submissions Technical Evaluation: Urban Design (Urban Centre) Submissions, Ian Munro, 26 August 2022, appended to Statement of Evidence of Ian Colin Munro, (Urban Design – Local Centres), 2 September 2022.

<sup>12</sup> Paragraph 91, Statement of Evidence of Mr Akehurst, 2 September 2022.

**7. CONCLUSION**

7.1 Overall, I consider that the effects of rezoning Woolworths' land to Local Centre will be positive from an urban design perspective.

7.2 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.

**Richard Knott**

16 September 2022