

**BEFORE THE INDEPENDENT HEARING PANEL
APPOINTED BY HAMILTON CITY COUNCIL**

IN THE MATTER of the Resource Management Act 1991 (**Act**)

AND

IN THE MATTER of hearing submissions on Plan Change 5 to the Hamilton
City District Plan

BETWEEN **THE ADARE COMPANY LIMITED**
Submitter #53

AND **HAMILTON CITY COUNCIL**
Local authority

**REPLY EVIDENCE OF WAYNE BREDEMEIJER
FOR THE ADARE COMPANY LIMITED**

URBAN DESIGN

22 SEPTEMBER 2022

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SUMMARY OF EVIDENCE

1. My name is Wayne Bredemeijer. I prepared a statement of evidence in chief (**EIC**) on urban design on behalf of The Adare Company Limited (**Adare**) dated 16 September 2022.
2. I have the qualifications and experience set out in my EIC. I repeat the confirmation given in my EIC that I have read the Code of Conduct for expert witnesses and that my evidence has been prepared in compliance with that Code.
3. I respond to matters raised in the expert evidence of Mr Richard Knott and Mr John Sofo for Woolworths New Zealand Limited (**Woolworths**).
4. The scope of this reply relates to the location of the Local Centre Zone (**LCZ**) and specifically the possibility of a supermarket located on the south-western quadrant of the proposed Peacockes Road-Whatukooruru Drive intersection.
5. Both Mr Knott and Mr Sofo criticise the Conceptual Design Options for the Peacocke Local Centre prepared by Urbanismplus and attached as Appendix G to my EIC. It is important to realise that these concepts are just that – conceptual design options. Many of the criticisms can and would be resolved as part of future detailed design stages.
6. It is also important to consider that Mr Knott and Mr Sofo do not criticise my EIC on a key point, namely that the LCZ is amply large enough to accommodate the projected non-residential uses (even in a conservative and space-inefficient manner), while leaving approximately 1.0 to 1.3ha of LCZ land vacant.
7. I disagree with Mr Knott and Mr Sofo that the LCZ should be extended to the west in order to include the Woolworths site in this zone and effectively enable a supermarket to be developed on this site. To the contrary, I think that if the Woolworths site were to be included in the LCZ this would result in a weaker design outcome for the centre as a whole.

RESPONSE TO RICHARD KNOTT

Adare's site and concepts

8. Mr Knott compares the landform of the LCZ with that of the Woolworths site, asserting that the former is undulating, while the latter is relatively flat.¹ By doing this he casts doubt on the concept of the mainstreet leading to an open space with a relationship with the river corridor. Yet Mr Knott does not go so far as saying that the mainstreet and the entire LCZ should be moved. Rather, in the balance of his evidence he accepts the proposed LCZ, including its mainstreet. Apart from doubts about the mainstreet, Mr Knott does not question or discredit the suitability of the current LCZ land for a supermarket. The essence of his point is that the Woolworths site is flatter than land on the eastern side of the road. I do not consider that this justifies extending the LCZ as sought by Woolworths.
9. The current LCZ land is suitable for development and in my opinion its topography does not prevent a meaningful visual and physical connection with an open space at the eastern end of the mainstreet and the river beyond. The mainstreet will lead to (and as one moves along it will gradually expose) an open space that is part of the existing landform of the Southern Gully meeting the Waikato River corridor. From that open space an extensive network of passive recreational open spaces can be experienced and accessed. I consider that the location of the mainstreet connecting between a busy traffic node and a unique landscape feature is well chosen and will contribute to a Local Centre with a true sense of place. Based on a study of the contours during the Amberfield master planning process, I am confident that a supermarket and other centre uses can be accommodated on the LCZ site, with earthwork modifications (as is required almost anywhere else in Peacocke).
10. Mr Knott criticises the concepts attached to my EIC for the poor edge to Peacockes Road that these create, by locating the service area on this western side.² I accept that most supermarkets have blank edges on three sides, including the service area. A key design objective is to determine

¹ Statement of Evidence of Richard Knott on behalf of Woolworths New Zealand Limited (Urban Design), 16 September 2022, at [2.2] and [6.2(c)].

² Statement of Evidence of Richard Knott on behalf of Woolworths New Zealand Limited (Urban Design), 16 September 2022, at [3.13].

which side to prioritise for activation and sleeving, and which to architecturally embellish and / or screen with landscaping. In the case of the concepts, the activation of the mainstreet is prioritised, followed by the north-south street which accommodates the supermarket frontage and carpark surrounded by some retail.

11. I consider that a supermarket on the eastern side of Peacockes Road, including as laid out in the Conceptual Design Options with its service area facing Peacockes Road, can be designed to be well integrated in the context of Peacockes Road and can announce itself to passers-by through signage and appropriate architectural detailing and patterning.
12. Mr Knott explains that a successful centre accommodates parking and one or more anchors on its edges.³ From this he concludes that supermarket carparking needs to be on the edge of the centre, not in the middle of the centre. Whilst I am aware that supermarkets like to reserve their carparks for 'their customers' only, one can assume that in practice customers would like to combine shopping at a supermarket with a walk to other shops. The location of the supermarket carpark is therefore important. I agree that it should not be located right in or on the mainstreet. The concepts attached to my EIC show carparks on either side of, but not located directly within, the mainstreet. This will allow for the mainstreet to be lined with uninterrupted active edges. From both the northern and southern carparks the mainstreet is accessible within a short walk, and without the need to cross a road. All other centre destinations can be equally easily accessed through a short walk. Additional parking can be provided along the network of streets within the centre and, if required, in the form of off-street carparks on the many sites that are shown as surplus in the concepts. However, I reiterate that the concepts are just concepts and there is sufficient space to optimise the location and arrangement of the carpark and servicing as part of detailed design.
13. Mr Knott considers that locating a supermarket on the eastern side of Peacockes Road will increase the number of vehicles driving through the

³ Statement of Evidence of Richard Knott on behalf of Woolworths New Zealand Limited (Urban Design), 16 September 2022, at [3.2].

mainstreet.⁴ In my view, in a successful centre, traffic will be dispersed through a network of streets in which efficient vehicle access will be balanced with safe and convenient pedestrian and cycling movement. In the Urbanismplus concepts this includes a connection labelled 'Bridge Street', the north-south route connecting through Amberfield, in addition to the mainstreet. Traffic through these streets will provide activation of, and passive surveillance over, the streetscape and bring customers to and past all shops and services (not only the supermarket). I do not favour a concept in which only the supermarket will be conveniently accessed by car, while other shops will be 'left out'. One of the essential aspects of a street-based centre, as proposed for Peacocke, is that traffic and pedestrians can circulate through a network of calmed streets, whereby traffic assists with passive surveillance and passing trade.

Woolworths' site and concept

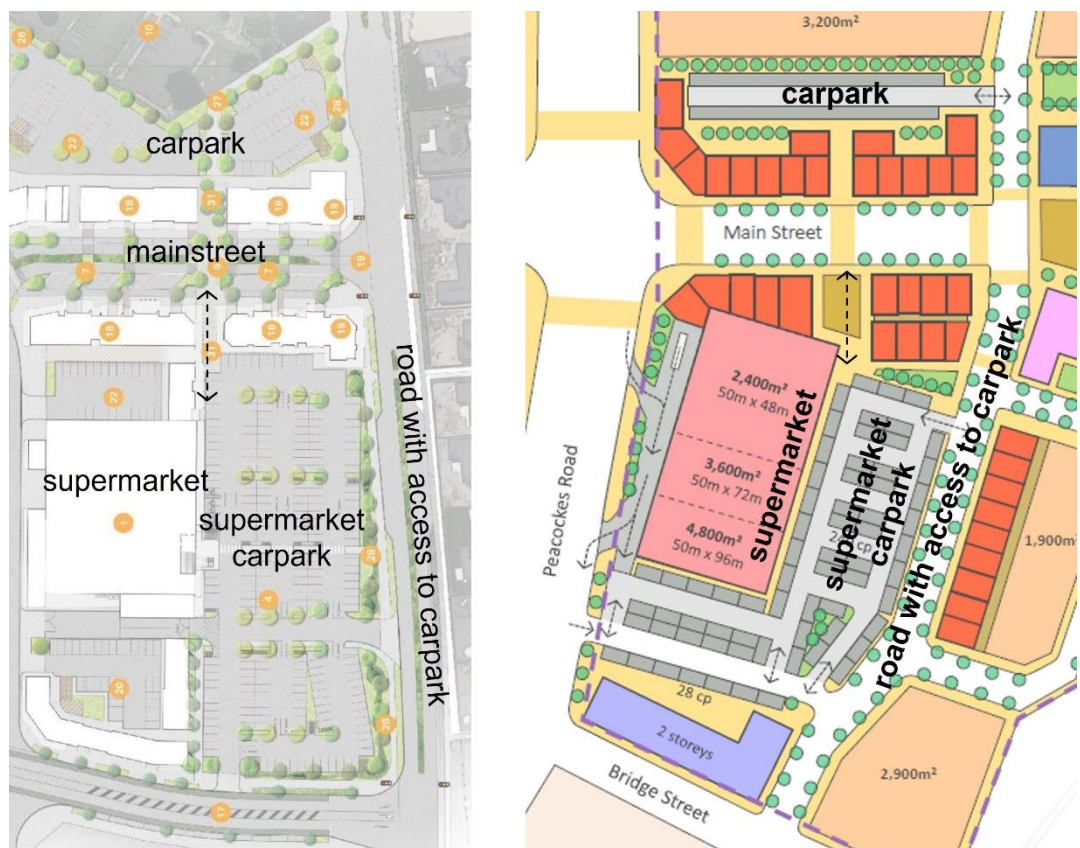
14. Mr Knott has not included a concept or diagram for the Local Centre option that he favours or describes in the scenario that the Woolworths site accommodates a supermarket. There is however a verbal description of the intended layout for a supermarket on the Woolworths site. From this description I conclude that it will present a blank wall to Peacockes Road, a service area to the street along the southern boundary (likely opposite or adjacent to residential neighbours), while 'sleeving' with other centre uses is required to activate Whatukooruru Drive to the north of the site. I cannot see how from an urban design perspective this is superior to the concepts attached to my EIC.

15. The description of the Woolworths concept includes a supermarket near the southern side of the Woolworths site, with its carpark located between the building and the street. The supermarket will thus be removed from the mainstreet, but to remedy this, there will be a 'clear pedestrian route' to it. This route will traverse a large supermarket carpark and must cross Peacockes Road (more on this below). Compared to the proximity of a supermarket to the mainstreet that PC5 can offer based on the entire LCZ

⁴ Statement of Evidence of Richard Knott on behalf of Woolworths New Zealand Limited (Urban Design), 16 September 2022, at [3.10].

being located east of Peacockes Road, I consider this a much inferior outcome for pedestrians.

16. Mr Knott includes an extract of the Rototuna CDP to demonstrate the strong pedestrian connections between the supermarket and the mainstreet.⁵ The Rototuna CDP is strikingly similar to the concepts attached to my EIC. I provide a comparison with Option 1 in the image below. In both layouts there is a short, convenient, direct pedestrian route (arrows in the images below) between the mainstreet and the supermarket carpark and entry.



Comparison between the Rototuna layout included in Mr Knott's EIC (left) and Option 1 of the Peacocke Local Centre Concept attached to my EIC (right). Note: Mr Knott's Rototuna plan is rotated by 90 degrees, and I have added annotations to both plans for clarity.

17. The description of the Woolworths option includes activation of the street on the northern site edge through other activities, like a medical centre.⁶ This demonstrates that Mr Knott is of the opinion that to

⁵ Statement of Evidence of Richard Knott on behalf of Woolworths New Zealand Limited (Urban Design), 16 September 2022, at Figure 2.

⁶ Statement of Evidence of Richard Knott on behalf of Woolworths New Zealand Limited (Urban Design), 16 September 2022, at [6.2(b)].

appropriately integrate a supermarket in the urban fabric on the western side of Peacockes Road, other uses are needed. The large carpark needs to be 'sleeved'. This sleeving takes away commercial GFA that should be used to populate the mainstreet and surrounding LCZ areas. In contrast, the concepts attached to my EIC show sleeving of the supermarket and carpark edges that are part of, and have a symbiotic relationship with, the mainstreet.

18. Mr Knott asserts that the supermarket should be opposite the proposed school on the north-western quadrant of the intersection.⁷ This will, in his view, encourage the school to front onto the road and more strongly integrate it in the centre. Firstly, this contradicts the description of the Woolworths concept that has the supermarket on the southern part of the Woolworths site, with a carpark near the road and some other uses to sleeve this carpark. Secondly, I cannot see why a supermarket carpark and some sleeving is a more compelling reason for a school to front onto a road than high-density residential would provide.

Peacockes Road

19. The Joint Witness Statement for Planning, Retail, Economics and Urban Design (Local Centre) recorded discussion about the nature of the upgrades to Peacockes Road and the proposed Whatukooruru Drive intersection.⁸ In my EIC I refer to this as one of the reasons for the location of the entire Local Centre on the eastern side of Peacockes Road. Mr Munro's evidence also includes this point.
20. Mr Knott does not agree with this. He refers to the Operative District Plan, which has the Local Centre indicatively spread over both sides and concludes that Peacockes Road is not regarded as a barrier by the Council.⁹ This is, however, now superseded by a better understanding of the role that Peacockes Road should fulfil in the context of the growth area

⁷ Statement of Evidence of Richard Knott on behalf of Woolworths New Zealand Limited (Urban Design), 16 September 2022, at [5.1].

⁸ Joint Witness Statement, Planning, Retail Economics and Urban Design (Local Centre), 25 August 2022, at page 2.

⁹ Statement of Evidence of Richard Knott on behalf of Woolworths New Zealand Limited (Urban Design), 16 September 2022, at [4.4].

and the form it should take, as evidenced by the design that is out for tender.

21. I agree with Mr Knott that there will indeed be pedestrian crossings between west and east of Peacockes Road.¹⁰ However, one needs to cross multiple lanes of traffic and cycle lanes in two directions. Pedestrians and cyclists can certainly safely move between west and east, but the road will create a distance and time delay when moving between the Woolworths site and the mainstreet and other parts of the LCZ. This would not change whether the speed limit on Peacockes Road would be 50, 40, or even 30km/h.
22. Mr Knott is correct in his observation that the Amberfield consent proposes to locate the frontage of dwellings along Peacockes Road.¹¹ The consent is however being amended so that vehicle access to these dwellings will be from the rear or side, to limit individual driveways along this road. These changes are being made following discussions between HCC and Adare and is a further demonstration of the nature of Peacockes Road as a minor arterial with an important role for buses, through-traffic and long-distance cycling.

RESPONSE TO JOHN SOFO

Adare's site and concepts

23. Mr Sofu asserts that the centre diagrams in the Amberfield master plan report show there is 'inadequate spatial provision for a full supermarket to be in the LCZ if the form of development indicated is to be followed'.¹² Since the completion of that master plan in 2018, these diagrams have been developed and adjusted based on further detail regarding the likely demand for retail and commercial floorspace (information that also was not available when the Operative District Plan was prepared). The concepts attached to my EIC show that the rationale (including connectivity and mainstreet amenity) behind the master plan diagrams can remain intact, while accommodating a larger supermarket or even two

¹⁰ Statement of Evidence of Richard Knott on behalf of Woolworths New Zealand Limited (Urban Design), 16 September 2022, at [4.5].

¹¹ Statement of Evidence of Richard Knott on behalf of Woolworths New Zealand Limited (Urban Design), 16 September 2022, at [3.13].

¹² Statement of Evidence of John Sofu on behalf of Woolworths New Zealand Limited (Architecture), 16 September 2022, at [2.5(g)].

retail anchors. These diagrams also show that there is more than enough land in the LCZ on the eastern side of Peacockes Road to accommodate the projected demand for non-residential floorspace.

24. The Urbanisplus concept attached to the JWS is criticised as naïve and impractical.¹³ Mr Sofo observes that there will not be enough parking. However, both the JWS concept and those attached to my EIC are based on an industry standard advised by Mr Bowker for one carpark per 20m² of supermarket GFA. I understand that it is also debatable whether a supermarket as large as 4,800m², and for which parking is provided in Option 1 with the largest carpark, is required. As stated, there is sufficient land for this to be increased if required, while parking for other centre uses could be provided along the street and in off-street locations on nearby surplus LCZ land.
25. Mr Sofo also criticises the JWS concept for the relationship between the supermarket and the mainstreet.¹⁴ However, in the JWS concept and also in the concepts attached to my EIC the northern side of the supermarket is sleeved with the specialty retail of the mainstreet to activate this street. A short walk will connect pedestrians between the shops in the mainstreet and the supermarket carpark and entrance. In my diagrams a strategically placed plaza (the brown shape) opens a strong visual connection between the mainstreet and the supermarket carpark. I would assert that from the mainstreet one could see the carparks in the concepts attached to my EIC even more clearly than in the Rototuna concept (with a Woolworths supermarket near a mainstreet) included in Mr Knott's evidence. In the Urbanisplus concepts only a portion of the carpark is visible, but that is intentional to ensure specialty retail buildings dominate the mainstreet and not a large carpark. The supermarket entry will be visible from the carpark, and with good design attention to the north-eastern corner, the supermarket could also 'announce itself' to the mainstreet.

¹³ Statement of Evidence of John Sofo on behalf of Woolworths New Zealand Limited (Architecture), 16 September 2022, at [5.2].

¹⁴ Statement of Evidence of John Sofo on behalf of Woolworths New Zealand Limited (Architecture), 16 September 2022, at [5.2(b)].

26. The loading zones in the diagrams are criticised for being unworkable.¹⁵ Notwithstanding the fact that these are conceptual only and do not constitute detailed design, I am confident that the slip road arrangement along Peacockes Road could work from an urban design perspective. Servicing vehicles will enter from and exit onto Peacockes Road, without moving through the mainstreet. The concepts provide flexibility (possibly with small adjustments) for a drive-through service lane with vehicles additionally using Bridge Street and / or the north-south street.

Woolworths' concept

27. Mr Sofo also does not attach a diagram or design to demonstrate how a supermarket development on the Woolworths site would fit, function, and more importantly, how it would be integrated within the urban fabric. Instead, he describes it in words only.¹⁶ Below I provide commentary on what is known about the supermarket that Mr Sofo seems to have in mind:
- (a) *The building will be located in the south of the site with a large carpark in the front.* This will mean that the supermarket will be located away from Whatukooruru Drive, separated from it by a large carpark, and does little to activate this street.
 - (b) *There will be some smaller buildings between the carpark and the street for activation and a gateway building on the north-eastern corner of the site.* Smaller buildings would be required to activate Whatukooruru Drive. This would use up commercial floorspace required to populate the mainstreet and other key street frontages in the centre on the eastern side of Peacockes Road.
 - (c) *Carparking will be located by the front door.* This is similar in the concepts attached to my EIC.
 - (d) *Checkouts will be located by the entry.* This can similarly be accommodated in the concepts attached to my EIC in which the long side of the supermarket is located towards the carpark.

¹⁵ Statement of Evidence of John Sofo on behalf of Woolworths New Zealand Limited (Architecture), 16 September 2022, at [5.2(c)].

¹⁶ Statement of Evidence of John Sofo on behalf of Woolworths New Zealand Limited (Architecture), 16 September 2022, at [2.5] and [4.1].

- (e) *Loading on the southern edge, separated from other vehicles.* This loading area would be located along the future local road along the southern boundary of the Woolworths site and therefore face residential neighbours. I note that also in my concepts service vehicles can be kept separate from customers. Notwithstanding this, I also note that in the Rototuna layout (which accommodates a Woolworths supermarket) in Mr Knott's EIC, service vehicles exit the loading zone via the customer carpark and that thus a degree of mixing seems acceptable.
- (f) *Three service walls.* Mr Sofo would accept a blank wall facing Peacockes Road, but apparently not the loading zone in the concepts attached to my EIC.
28. Mr Sofo also refers to the pedestrian links between the supermarket and the rest of the centre.¹⁷ These would be needed to remedy the fact that the supermarket would be located at some distance from the rest of the centre and separated from the street by a large carpark. This is in contrast with the close proximity that a supermarket on the eastern side of Peacockes Road can provide.

Applying Mr Sofo's supermarket attributes to the LCZ land

29. Urbanismplus has taken key parts of Mr Sofo's description of how a Woolworths supermarket would be fitted on the Woolworths site, combined with the key characteristics of the Rototuna example in Mr Knott's EIC, and applied this to the LCZ land. The result of this is included in **Appendix A** to this statement. For comparison, the Rototuna example is shown next to this concept and at approximately the same scale. Similar to the concepts attached to my EIC, this diagram is only an indicative concept, with the aim of proving that the LCZ is large enough to appropriately accommodate the projected floorspace demand, including a supermarket, as well as the mainstreet, the north-south road, and open space adjacent to the river corridor.

¹⁷ Statement of Evidence of John Sofo on behalf of Woolworths New Zealand Limited (Architecture), 16 September 2022, at [4.3].

30. It also shows that Mr Knott's and Mr Sofo's criticism of the LCZ concepts in my EIC regarding the functionality of the supermarket and its service arrangement, as well as the location of the carpark and the visibility of the entrance, can all be rebutted. The following key aspects of the concept in Appendix A should be noted:
- (a) The supermarket, carpark and service area are similar in size and proportions to those elements in the Rototuna example. There is some surplus space in the block.
 - (b) Compared to the Rototuna example, the supermarket has a similar relationship to a key road, the mainstreet, its carpark, and its servicing.
 - (c) The supermarket carpark is located along (and accessible from) Peacockes Road, with the entrance facing this carpark. This will make the carpark and entrance visible from Peacockes Road.
 - (d) The supermarket carpark will be visible, and within a short walking distance, from the mainstreet.
 - (e) The service area will have a drive-through arrangement. It will be accessed from the north-south road (which is accessible from Bridge Street) and will exit onto Peacockes Road.
 - (f) The service area will be screened by a building.
 - (g) The supermarket edge facing the north-south road could be sleeved, similar to the edge facing Fergy Place in Rototuna, where allowance for future sleeving seems to have been made.

Woolworths' site

31. Mr Sofo states that the Woolworths site connects better with the residential community and that it has the ability to draw people to the eastern side of Peacockes Road (where the finer-grained retail will be).¹⁸ I agree that the site is slightly more centrally located in Peacocke than the LCZ land. However, it is not obvious how this site would benefit the

¹⁸ Statement of Evidence of John Sofo on behalf of Woolworths New Zealand Limited (Architecture), 16 September 2022, at [6.2].

balance of the centre on the eastern side of Peacockes Road, given the distance and the road separating these two sides. It is important to realise that immediately to the north, south and west the LCZ land is surrounded by MRZ with the IHO overlay for high-density residential development.

32. Presented as a key attribute of the Woolworths site is that a school is proposed for the north-western quadrant of the intersection.¹⁹ Apparently, this means that the school will have a stronger association with the centre. I disagree with this as the school in that location would be located on the opposite side of a minor arterial (Whatukooruru Drive running east-west) just like it would be located opposite a minor arterial (Peacockes Road running north-south) from the centre if that centre were only located on LCZ land.
33. Mr Sofo sees a benefit in locating the supermarket on the western side, so that land on the eastern side of Peacockes Road can be reserved for fine-grained, small-scale commercial and retail developments which will enable the street frontage activation rules (as proposed in the Design Guide) to be achieved.²⁰ The concepts attached to my EIC and the concept in Appendix A demonstrate that multiple scenarios exist to accommodate all commercial demand fully within LCZ land, including one or two supermarkets, in ways that meet the frontage activation rules in the Design Guide. I believe there are multiple other compliant ways to arrange the uses wholly within LCZ land.
34. Mr Sofo asserts that on the Woolworths site parking and loading can be located away from identified primary and secondary frontages.²¹ He does however not demonstrate or clarify how street frontages would be activated, other than that other uses and a gateway corner building would need to be located between the carpark and the street. The point that the parking and the store entrance beyond the carpark would need to be visible as well casts doubt on Mr Sofo's assertion of street activation.

¹⁹ Statement of Evidence of John Sofo on behalf of Woolworths New Zealand Limited (Architecture), 16 September 2022, at [6.3].

²⁰ Statement of Evidence of John Sofo on behalf of Woolworths New Zealand Limited (Architecture), 16 September 2022, at [2.5(e)].

²¹ Statement of Evidence of John Sofo on behalf of Woolworths New Zealand Limited (Architecture), 16 September 2022, at [3.2(c)].

35. I also see a risk in the sleeving buildings wanting to be orientated towards the carpark and not (or only partly) face the road, given that this is a minor arterial and the carpark will be located behind these buildings.

Peacockes Road

36. Mr Sofo presents the position in Mr Munroe's evidence that Peacockes Road would separate the Woolworths site from the LCZ land as if Peacockes Road is regarded as an 'impenetrable boundary' or 'impenetrable road'.²² These are unhelpful words that misrepresent the above position, which is also mine. To clarify, in my view Peacockes Road will extend the physical distance between these sites through the additional time that it would take to wait for an opportunity to cross. It is easy to imagine that it would constitute a psychological barrier, due to the multiple lanes of traffic (including buses) and cycleways that one needs to cross. Mr Sofo seems to also suggest that locating centre uses on both sides of the road means that Peacockes Road would become less of a barrier.²³ I cannot see how a greater desire to cross the road would decrease its severance. The design of this road shows a typical minor arterial that accommodates bus routes, through-traffic, off-street cycling and turning lanes at the intersection. It seems logical that, were a supermarket located on the Woolworths site, customers would rather drive between the supermarket and the shops on the eastern side of Peacockes Road. In contrast, customers of a supermarket located to the east of Peacockes Road would have a short and easy walk to other shops.

CONCLUSION

37. My opinion in support of PC5 regarding the LCZ remains unchanged. In fact, I am galvanised in my support, having read Mr Knott's and Mr Sofo's arguments against it. I consider that if the Woolworths site were to be included in the LCZ, and a supermarket located on this site, this would result in a weaker design outcome for the centre as a whole.
38. Keeping the LCZ entirely to the east of the intersection will assist with the creation of the Local Centre in line with the objectives of the Council for

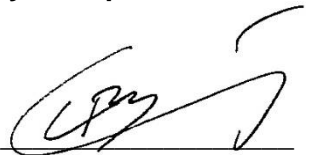
²² Statement of Evidence of John Sofo on behalf of Woolworths New Zealand Limited (Architecture), 16 September 2022, at [6.3].

²³ Statement of Evidence of John Sofo on behalf of Woolworths New Zealand Limited (Architecture), 16 September 2022, at [6.2].

this centre, which I consider sound and in line with best practice urban design.

39. A supermarket and all its associated elements could be accommodated within the LCZ land in an efficient and functional way. This could happen in many forms and layouts, including those attached as Appendix G to my EIC, or the right-hand image in Appendix A to this statement of evidence. All of these show a supermarket that is well integrated with the rest of the centre. A direct and seamless relationship between the supermarket carpark, entrance and the mainstreet is created in all of these.

Dated this 22nd day of September 2022



Wayne Bredemeijer

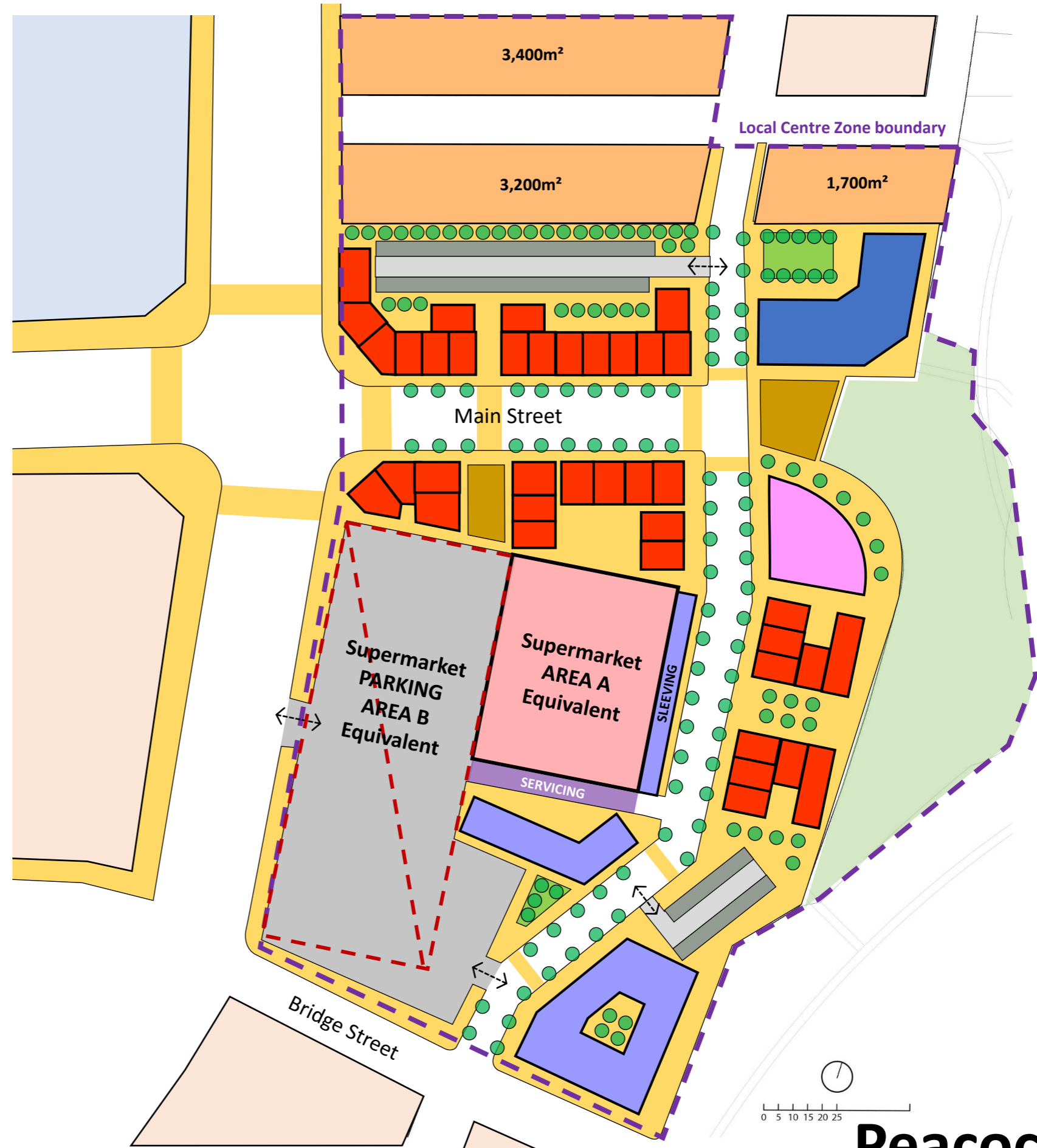
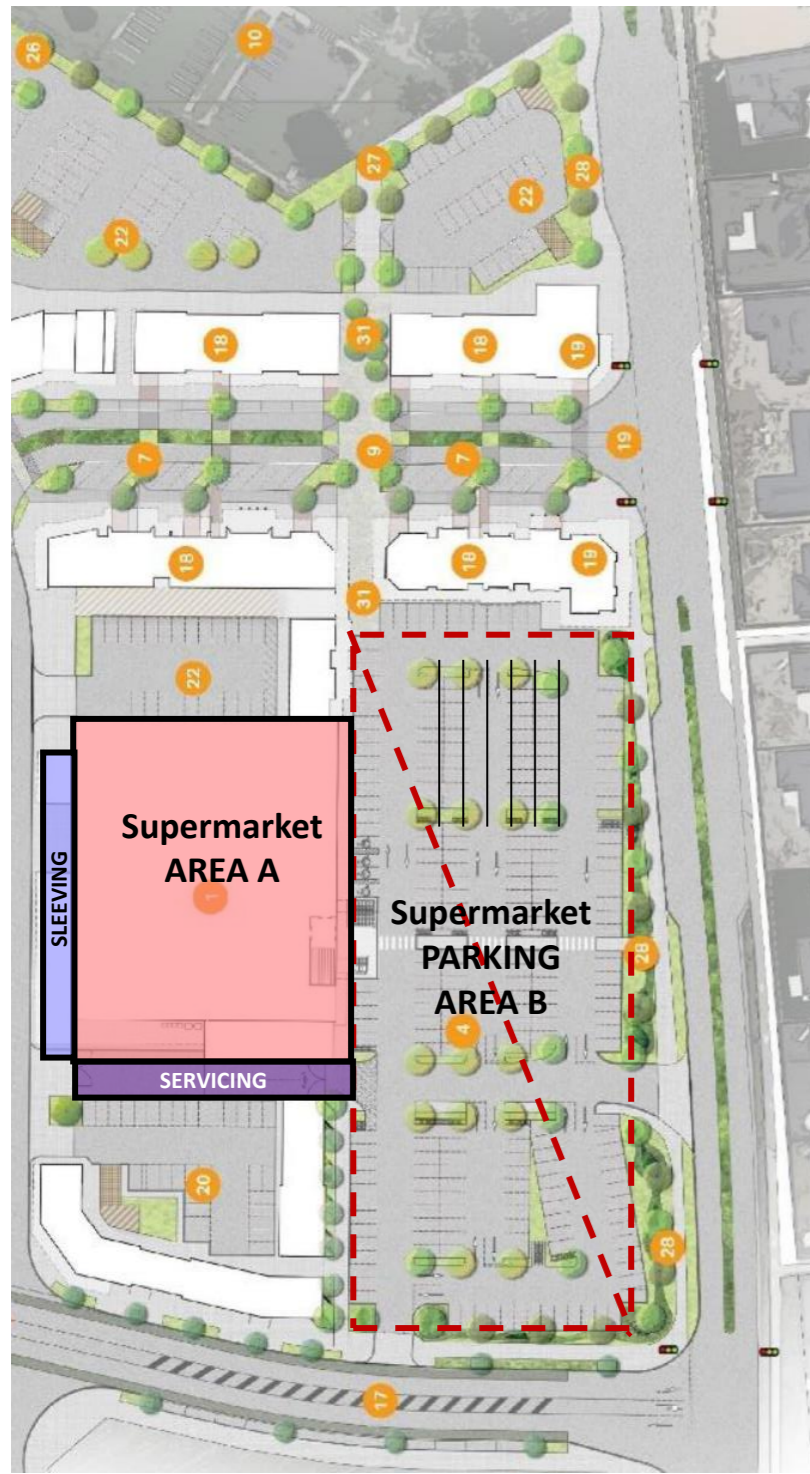
APPENDIX

A. Conceptual design option for the Peacocke Local Centre in comparison with Rototuna supermarket

Appendix A. Conceptual design option for the Peacocke Local Centre in comparison with Rototuna supermarket

Peacocke Local Centre Concept – Comparison with Rototuna Supermarket

Urbanismplus, September 2022



Rototuna Example

Peacocke