

**Before a Hearings Commissioner appointed by
the Kāpiti Coast District Council**

Under the Resource Management Act
1991

And

In the Matter of an application under section 88 of
the Act by Kapiti Retail Holdings
Limited for the construction and
operation of a Countdown
supermarket at 160 Kapiti Road,
Paraparaumu (RM210151)

**Statement of Evidence of
Richard John Knott
for Kapiti Retail Holdings Limited**

Dated: 8 March 2022

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INTRODUCTION

1. My name is Richard John Knott. I am an Urban Designer, Heritage Specialist and Town Planner and the Director of Richard Knott Limited.
2. I hold a Master of Arts in Urban Design, Post Graduate Diploma in Building Conservation, a post graduate Bachelor of Planning and a Bachelor of Art with Honours in Town and Country Planning.
3. I am a Chartered Town Planner (Member of the Royal Town Planning Institute), Member of the Institute of Historic Building Conservation and Member of the Institute of Highway Engineers. I have worked in these areas for over 32 years.
4. I am an Independent Planning Commissioner and have sat on hearing panels and/or chaired hearings for a number of Councils, including Hamilton City Council, Whangarei District Council, Tauranga City Council, Taupo District Council, South Wairarapa District Council and Auckland Council.
5. I have held various senior urban design and heritage positions in New Zealand and the United Kingdom including Group Manager Urban Design at Manukau City Council, which was at the time New Zealand's third largest and fastest growing city. Prior to establishing my own practice in 2014, I was an Associate Director at AECOM NZ Ltd and ran their Design and Planning business for New Zealand.

Background and Involvement

6. I prepared the Urban Design Assessment, dated 8th July 2021, that was submitted as Appendix 3 to the Assessment of Environmental Effects (**AEE**) for the construction and operation of a new Countdown supermarket and two new trade retail tenancies in Paraparaumu (**Proposal**).
7. I have visited the site on a number of occasions, most recently on the 6th February 2022, and am familiar with the site and surrounding environment.

Code of Conduct

8. While this is not an Environment Court hearing, I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. This evidence is within my area of expertise,

except where I state that I am relying on material produced by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in my evidence.

SCOPE OF EVIDENCE

9. My evidence will cover the following topics:
 - (a) The Existing Site and Local Area;
 - (b) The Proposed Development;
 - (c) District Plan Assessment;
 - (d) Response to submissions and Section 42A Report; and
 - (e) Proposed conditions of consent.

EXECUTIVE SUMMARY

10. In my opinion the site at 160 Kāpiti Road (**Site**) has significant merit as a site for a supermarket. It is within an area that already contains a large number of developments that attract retail customers, and that it would be common to see within main street or shopping centre locations (or on the edge of these locations).
11. I have established that the proposed development responds positively to the expectations of Policies GIZ-P1 and GIZ-P2(d), to the 'Key Treatments' in the Council's Streetscape Strategy and Guidelines (Guidelines) which are relevant to private land and to the expectations of the Council's Crime Prevention Through Environmental Design Guidelines.
12. Overall, I consider that the proposed development has been designed to appropriately balance the opportunities offered by the Site with the requirements for supermarket design. It represents an appropriate urban design and landscape response to the context and will be integrated into its surroundings.
13. From an urban design perspective, the potential adverse effects will be no more than minor.

THE EXISTING SITE AND LOCAL AREA

14. The Site fronts the northern side of Kāpiti Road, immediately opposite the Kāpiti Landing business park. Kāpiti Road consists of one lane in each direction, separated by a flush median.
15. The Site is zoned for industrial use and there is currently a vacant large footprint trade retail building on the Site. The existing building is located approximately central to the Site, with yard areas to the north, south and east, along with a large car park area between the building and Kāpiti Road. This arrangement, with the car parking to the front of the Site is typical of development along the northern side of Kāpiti Road, with the majority of developments in the area being set back from the Site frontage with car parking in the intervening space and often large yard areas to the side and rear of buildings.
16. Whilst sites to the east and west are all zoned for industrial use, they include a wide range of uses which would attract retail customers, and which would be common to see within main street or shopping centre locations (or on the edge of these locations) including:
 - (a) Retail food outlets (including a small supermarket, butcher, deli)
 - (b) Carpet/flooring sales
 - (c) Bed sales
 - (d) Gym, day spa/health and beauty
 - (e) Tiles, blinds, curtains, paint
 - (f) Vehicle sales (with parts and servicing).
17. To the south of Kāpiti Road, the Kāpiti Landing business park provides a New World supermarket, Mitre 10 Mega and a range of smaller retail units and food and beverage units.
18. In my opinion the Site has significant merit as a site for a supermarket:
 - (a) The Site fronts an arterial road and can be accessed from an existing roundabout, meaning that it will be simple and efficient for shoppers arriving by car to access the Site.
 - (b) There is an existing bus route passing the Site.

- (c) It is located close to the Kāpiti Landing business park, and the services within Kāpiti Landing, with pedestrian access between the Site and Kāpiti Landing available at the roundabout to the front of the Site.
 - (d) The Site does not immediately adjoin any residential activity or require travel through any residential zones to access it.
 - (e) The Site is within an area that, as noted above, contains a large number of developments that attract retail customers, and that it would be common to see within main street or shopping centre locations (or on the edge of these locations).
19. Overall, it is my view that locating the supermarket in the proposed location makes good use of a currently redundant site which is well located to serve the proposed supermarket catchment, is accessible by all modes of transport, is not out of step with the uses already in the area and is located very close to Kāpiti Landing business park and the Paraparaumu Town Centre.

THE PROPOSED DEVELOPMENT

20. Kapiti Retail Holdings Limited (**Applicant**) seeks consent for a new supermarket and two trade retail buildings. In response to the opportunities offered by the Site and the functional requirements for supermarket design, the Proposal:
- (a) Places the supermarket and trade retail buildings closer to the back of the Site in order to accommodate easy to view and easy to use car parking between the proposed building and the Kāpiti Road Site frontage. As noted above this arrangement is typical in the local area.
 - (b) Will deliver a well-designed modern building facade towards Kāpiti Road, of a scale which will provide a presence to the street and present an overall appearance which is of significantly greater interest and of much improved design relative to the existing building, to the benefit of the streetscape in general.

- (c) Provides large areas of glazing facing the car park, in both the supermarket, online area and trade retail buildings, ensuring good passive surveillance of the car park and towards Kāpiti Road.
- (d) Includes an area dedicated to fulfilling online orders with a frontage to the car park and towards Kāpiti Road. The provision of this space will bring greater activity to the front of the supermarket building and provide additional passive surveillance of the car park and towards Kāpiti Road.
- (e) The service yards for the supermarket and trade retail space are all provided away from public view and away from sensitive uses (such as residential which is far removed to the north-east). Separating these areas from publicly accessible areas will assist the operators to meet their health and safety obligations.
- (f) Provides high quality landscaping along the Site frontage and boundaries, as well as new street trees (replacing those to be removed), which together break/layer views of the buildings from Kāpiti Road, to be benefit of the streetscape in general.
- (g) Provides a strong pedestrian link from Kāpiti Road to the supermarket entrance with a new covered walkway through the car park. This will link to the existing pedestrian and cycle routes along Kāpiti Road and will link to Kāpiti Landing via a new pedestrian refuge in the central median of Kāpiti Road.
- (h) A dedicated customer drop off alongside the covered walkway to allow customers using taxis, ride share services, minibuses from retirement villages etc to be dropped off in a sheltered location close to the supermarket entrance without the vehicle dropping them off posing a hazard to other customers. The convenience of this drop off area is likely to encourage shoppers to consider alternative modes of transport which could reduce traffic.
- (i) Ten parking spaces are provided for EVs; this is likely to encourage the use of electric vehicles.
- (j) Canopies along the supermarket frontage and over the entrances to the trade retail buildings will further identify the entrances to these

buildings and increase the sense that the buildings provide passive surveillance of the car park and towards Kāpiti Road.

- (k) Does not introduce additional, vehicular access from Kāpiti Road but rather redesigns and improves the access allowing the retention of the existing planted berms along Kāpiti Road, supplemented by new planting within the street and along the Site frontage.
 - (l) Includes a landscape concept plan which will be ensured through the proposed conditions of consent. This plan provides a layering of landscaping from the berm at the Site frontage through the car park area towards the supermarket and trade retail buildings. Larger areas of planting are proposed around the vehicular accesses to the Site, to 'green' the frontage of the Site and break views of the buildings, whilst also allowing the proposed buildings to maintain a visual presence when viewed from Kāpiti Road.
21. Overall, I consider that the proposed development has been designed to appropriately balance the opportunities offered by the Site and the requirements for supermarket design, whilst also taking account of the expectations the Council's Streetscape Strategy and Guidelines, the Crime Prevention Through Environmental Design Guidelines and District Plan Policy GIZ-P1 – Land Use and Built Form in the General Industrial Zone. In my view, the proposal represents an appropriate urban design and landscape response to the context and which will ensure that the development will be integrated into its surroundings.

DISTRICT PLAN ASSESSMENT

22. A full assessment against **Policy GIZ-P1 - Land Use and Built Form in the General Industrial Zone**¹ is provided in my Urban Design Assessment, 8th July 2021.
23. In summary, the proposed development responds positively to the expectations of Policy GIZ-P1 in that:
- (a) The customer entrances to the supermarket, online collection area and entrances to the trade retail buildings all face Kāpiti Road.

¹ Previously Policy 6.16

- (b) Appropriately sized service areas and car parking are provided to meet the requirements of the supermarket and trade retail units.
 - (c) The service area to the trade retail units is located to the rear of the units and will therefore not be visible from a public location.
 - (d) Views of the supermarket service area from Kāpiti Road are screened by the online building/area, which steps out from the line of the main building and by landscaping.
 - (e) Access to the Site is provided direct from Kāpiti Road.
 - (f) There is limited signage, consisting of a single pylon sign on the Site frontage, signage above the entrance to the supermarket building, online collection building and above the glazed checkout area, and space for a single sign above the entrance to each trade retail building.
 - (g) The layout of the Proposal has been designed with reference to both the Crime Prevention Through Environmental Design Guidelines and Streetscape Strategy and Guidelines to ensure that the amenity of the area is maintained.
24. I have also considered **Policy GIZ P2 Non-industrial Activities in the General Industrial Zone**, and specifically 2(d) which indicates that retail activities that *'would be incompatible with the character and standards of amenity of the General Industrial Zone'* will be managed.
25. This is a location adjacent to a busy collector road, which is characterised by buildings set back from the street frontage with car parking to their front. This is also the form exhibited by the existing development on the Site. As described above, the proposed development adopts a similar form, with the supermarket and trade retail buildings set back from the street frontage. This arrangement reflects the character and standards of amenity in the surrounding General Industrial Zone and would be fully compatible with the surroundings.
26. The proposed design and layout of the Site, and the provided concept landscape scheme, respond to those 'Key Treatments' in the Council's

Streetscape Strategy and Guidelines (**Guidelines**) which are relevant to private land:

- (a) In its present state, the Site as existing is devoid of planting, apart from grass along the Site frontage (linking to the berm area), limited trees and low planting at the Site entrances. There are clear views of the existing building from Kāpiti Road directly across the existing area of car parking. Whilst this arrangement is similar to that seen on sites to the immediate north along Kāpiti Road, it does not break views existing areas of car parking or in any way 'filter' views of existing buildings. These matters are improved on by the design and layout of the Site, and the provided concept landscape scheme.
- (b) The Guidelines set out the importance of street trees to the creation of the anticipated character of the area. The proposed landscaping scheme responds to this by proposing additional planting and trees within the road reserve to 'fill in' existing gaps outside of the Site frontage. This additional planting is in line with the 'Possible Condition' illustrated for Commercial Collector Roads within the Guidelines. The spacing of the new street trees has been designed with reference to the location of street planting and the spacing of street trees seen on the area of Kāpiti Road to the north of the Site.
- (c) Within the Site layers of planting are provided to provide clear delineation of the Site frontage, to reduce views of parked cars and to disrupt direct views of the proposed buildings. The planted gardens located at each end of the perpendicular lines of car parking, along with the proposed covered pedestrian link, will ensure that the car park area is broken into discrete zones, rather than appear as a single large area and will further soften views of the buildings from Kāpiti Road. Planting along the side boundaries of the Site will provide separation of the Site from neighbouring sites on either side.
- (d) Selected plant species have taken account of the Guidelines, and hard surfaces propose the use of attractive, durable finishes which can be easily maintained to ensure a continuing high-quality appearance.

27. Overall, the proposed landscaping assists with achieving the outcomes expected by the Guidelines and will ensure that views of the proposed buildings are softened by a foreground of planting improving on the current situation.

RESPONSE TO SUBMISSIONS AND SECTION 42A REPORT

28. I have not identified any submissions that raise urban design matters.
29. The s42A report addresses Urban Design matters at paragraphs 52 to 57; and includes excerpts from the Council's urban design peer review prepared by Jaime Devereux of Urban Edge Planning Limited at paragraph 56. It notes that the peer review found that my Urban Design Assessment could be largely agreed with. The peer review recognises that the proposed development will not be out of character with the existing environment.
30. The quote from the peer review included at paragraph 56 states:

'There has been a typical approach taken to the supermarket design (including building and siting) which prioritises the motor vehicle consumer. I do want to emphasise that the proposal does not represent good urban design and that the perception of supermarkets and how they are used will not change without innovative precedence. The proposal is entirely vehicle dominated and presents a large expanse of asphalt fronting the street. I know that creative design solutions can allow for successful supermarkets that integrate better, with an attractive and inviting frontage with a pedestrian focus; especially given this site is located within walking distance from residential areas.'

31. I accept that some locations provide the opportunities suggested by the peer reviewer. However, this is a location adjacent to a busy collector road, where the land is zoned for industrial use and the surrounding sites characterised by buildings set back from the street frontage with car parking to their front. The one building at Kāpiti Landing providing a frontage to Kāpiti Road is separated from the street by a significant landscaped buffer and is accessed from within the Kāpiti Landing site.
32. Given the local environment, I do not consider that this is a Site which lends itself to the form of development alluded to in the urban design peer review.

Such an approach is more appropriate to a central city location such as Countdown Newtown, Wellington which has been designed to address the urban street frontage, where neighbouring buildings are also developed to their site frontage.

33. As set out above, the proposed development, including the concept landscape scheme, responds positively to those 'Key Treatments' in the Council's Streetscape Strategy and Guidelines (Guidelines) which are relevant to private land and, as set out in my report, has been designed to align with the Council's Crime Prevention Through Environmental Design Guidelines.
34. Given the circumstances of the Site and location I do not agree that the proposal represents a missed opportunity in design terms. Rather, I consider that it represents an appropriate response to its surroundings.

PROPOSED CONDITIONS OF CONSENT

35. I note that in response to the Urban Design peer review, the reporting officer recommends condition 12 which requires the provision of a design site plan for approval that shows diversity in surface treatments/changing materials for the construction of the customer car parking area fronting Kāpiti Road, to enhance the visual appearance of the Site.
36. In my view, whilst I recognise that this can provide an improved appearance to the environment for shoppers using the car park area, I do not consider that this treatment would be appreciable from outside of the Site, given the proposed landscaping along the Site boundaries and within the Site, and the distances involved between car park and street.
37. Further, I consider the proposed layered landscaping, the overall carpark design and layout and the differentiation already proposed in terms of different parking designations (accessible, parent, EV, Pick-up, drop-off) already assist in breaking up any perceived expanse.
38. There will be no direct adverse effects from not providing this varied surface treatment and I consider that this condition is not required. I consider that the landscape concept included as part of the application will be effective, and I therefore support the amendments proposed by Kay Panther Knight to

condition 13, and believe that the updated condition 13 will achieve the anticipated outcomes of the landscape plan approved under condition 1.

CONCLUSION

39. Having considered the matters raised in the Urban Design Peer Review and more broadly in the section 42A report, I remain of the opinion that the proposed development has been designed to appropriately balance the opportunities offered by the Site and the requirements for supermarket design, whilst also taking account of the expectations the Council's Streetscape Strategy and Guidelines, the Crime Prevention Through Environmental Design Guidelines and Policy GIZ-P1 – Land Use and Built Form in the General Industrial Zone.
40. The Proposal represents an appropriate urban design and landscape response to the context and which will ensure that the development will be integrated into its surroundings.
41. I consider, that from an urban design perspective, the potential adverse effects will be no more than minor and the proposal has been designed to respond to and ensure consistency with to Policy GIZ-P1 of the District Plan.



Richard John Knott

8 March 2022