

Hearing on Thursday, 2 May 2024 at Tory Room, Urban Hub, Level 4, 318 Lambton Quay

26 Ganges Road, 3 Dekka Street, 31 and 33 Nicholson Road, Khandallah Applicant:
Foodstuffs Properties (Wellington) Ltd c/o Barker & Associates Ltd Wellington City
Council Service Request Number: 517439

Tom O'Brien (9:45 - 10am)

Thank you for the opportunity to speak today. I've frequented the Khandallah New World for the last 10 years and lived in close proximity over that time. For last 7 years I've lived on the other side of Nicholson Road, near the proposed entry. My house sits in an elevated position above Nicholson Road, and looks north across towards the New World. At the moment, this aspect provides a residential amenity with a view across residential properties, within which the houses are surrounded by established vegetation. The proposal will result in this amenity being lost for the sake of a car park. At night, amenity will become adversely affected through a floodlit car park interrupting our visual amenity, as opposed to the ambience provided by residential house lights.

I ask that you refuse consent for this proposal.

S42A (p156): "...refuse consent for the proposal ..."

District Plan and Council regulations

Details around how the proposal does not fit with Council's regulations are in the appendix of these notes.

It is the matters detailed in MRZ-P14 which succinctly summarised why I am opposed to the proposal. 102 car parking spaces do not support the need of the local community. The large paved area needed for the car park is not of an intensity, scale and design consistent with the amenity values for this residential zone. The Visual Impact Simulations in Statement of Evidence from Cameron Wallace show the Nicholson Road frontage will no longer look residential: particularly VP1 (From bottom of stairs from 32 Nicholson Road) and VP2 (From bottom of driveway of 32 Nicholson Road).

The large paved area does not contribute positively to the urban environment and the resultant vehicle movements directly contrast the intent for attractive and safe streets. The whole point of the proposal is to facilitate private motor vehicle travel, and based on my observations the extent that the demand for parking spaces exceeds the supply is very limited and resolves itself.

Evidence of need for increased carpark capacity

The application is for the number of carparks to go from 38 to 100 car parks, a 163% increase. I would have thought there would be indicators showing a huge increase in parking demand, but there is no hard evidence in the proposal.

S42A (p56): "... the applicant has provided no data or evidence in terms of supporting capacity for additional car park spaces ..."

On Wednesday 24 April at around 5:30pm (with the supermarket shut the next day for ANZAC day morning) I was in the Khandallah New World Carpark, and while it was busy, there were 3-4 carparks always available.

Statement of Evidence - Traffic - Michael Nixon

(p20): Carried out observations of parking demand for one day (half-hearted study).

(p21): Chart shows at no time was the carpark at capacity, and neither were surrounding streets

A detailed traffic study was done for New World Island Bay data, but no such study has not been done for Khandallah.

(p58) “The O’Brien submission queried why the traffic report used New World Island Bay data. The reason for that was to be deliberately conservative ...”

(p28) from the one date study, per hour volumes dropped from 381 to 287, or by 25%.

(p29) “... the GFA of the supermarket is not changing, the number of traffic movements generated by the supermarket will not increase”.

S42A (p56) “... the provision of additional parking could have the impact of facilitating additional vehicle movements, resulting in a net increase of vehicle movements in the immediate area ...”

Common sense tells you that making more car parks available will lead to an increase in traffic movements.

A professional traffic report has not been done for Khandallah New World because it would show the carpark is never, or very rarely, at capacity. In my opinion, there was more carpark congestion pre-Covid (5-7 years ago), but since then the carpark has been seldom full in my experience. Maybe because more online shopping that is delivered or click-and-collect. The dynamics of car parking have changed.

Examining Foodstuffs logic:

- (1) the GFA is not increasing, so there won't be an increase in traffic.
- (2) putting in extra parks will not increase traffic numbers.

Then, given Foodstuffs can't show that the carpark is ever at capacity, why do we need a bigger carpark ?

Statement of Evidence - Corporate - David Boerson

Would like to focus on benefits section here.

6.2 Benefits:

(34) More carparks for customers.

More carparks for customers is a benefit, but the question is whether it offsets the costs of having these carparks.

(36) Customers can use the carpark to go to other shops in the village.

The suggestion that customers use the carpark to shop elsewhere in the village is inconsistent with existing signs at Khandallah New World carpark warning of a 90minute limit (New World only car parking). This is not a community carpark. That is not a benefit.

(37) Pedestrian pathway across carpark from Nicholson Road (some stairs)

The fact the carpark enables people to walk through it is not a reason for building a carpark. That is not a benefit.

Foodstuffs admits the car parking issue is only a peak hours issue.

(20) “The number of carparks on site is frequently unable to accommodate carpark peak demand. ... The store currently overtrades by our usual retail metrics in terms of sale per carpark...”

So the benefits accruing from building the carpark is for a much shorter period, while the costs are imposed on the community 24/7.

And Foodstuffs pull back the curtain here, the cost/benefit for Foodstuffs is there, they will make their money back from building the carpark. But is the cost/benefit attractive for society ?

(23) “We conduct regular customer surveys, and car parking (or insufficient car parking) is one matter that is regularly raised ...”

(24) and then anecdotal evidence is listed (customers needing to circulate the carpark, park on the street, come back at another time or travel to another store).

Could we see the data from these surveys ? Could be very few people and could be years ago. My sense is the carpark was busier about 5years ago, pre-Covid.

Conclusion

This is a question around cost/benefit of removing housing and replacing it with a super market carpark. The cost/benefit equation stacks up for Foodstuffs, they allude to that in their submissions. The benefit to Foodstuffs from having more carparks at peak hours is significant enough for them to pay the costs of the carpark. It also positions them well to increase the size of the supermarket in the future.

But there is no hard data saying a larger carpark is needed. A one day study that shows the carpark never at capacity. Allusion to anecdotal evidence of carpark congestion, but no data to back it up. That's what makes this proposal arrogant. On that basis alone, you should refuse consent for this proposal, as the council recommends.

For the community, we will live with the larger carpark 24/7. And we will live with the costs imposed from traffic, the loss of housing, the loss of character, and the environmental impact of concreting.

Overall, the number of proposed car parking spaces is complete overkill, detracts from my residential amenity, results in an unsafe roading environment (particularly along Nicholson Road), is designed to attract private vehicles when local and central government policy is trying to achieve the opposite, and is completely contrary to the relevant objectives and policies of the Operative and Proposed District Plans.

I request that you refuse consent for this proposal.

Appendix

Ultimately, the proposal does not align with the Objectives and Policies of the Operative and Proposed Wellington District Plans.

- The Operative District Plan contains Policy 4.2.4.7 which states that non-residential activities in residential areas must maintain character and amenity standards, and any adverse effects are appropriately avoided, remedied or mitigated. The proposal does not even come close to satisfying this requirement. The proposal is also inconsistent with policies:4.2.3.1 (ensure that new developments in the Outer Residential Area acknowledge and respect the character of the area in which they are located);
- 4.2.3.6 (minimise hard surfaces by encouraging residential development that increases opportunities for permeable open space areas);
- 4.2.3.7 (encourage the retention of mature, visually prominent trees and bush in association with site redevelopment); • 4.2.5.1 (To promote a sustainable built environment in the Residential Area that: Utilises principles of low impact urban design; and Provides for the efficient end use of energy (and other natural and physical resources), especially in the design and use of new buildings and structures);
- 4.2.8.3 (encourage retention of existing vegetation, especially established trees and existing native vegetation);
- 4.2.8.4 (encourage retention and restoration of indigenous ecosystems and habitats);
- 4.2.12.1 (seek to improve access for all people, particularly people travelling by public transport, cycle or foot, and for people with mobility restrictions); and
- 4.2.12.4 (require appropriate parking, loading and site access for activities in Residential Areas).

As such, the proposal does not meet the following objectives of the Operative District Plan:

- 4.2.2 (To recognise and enhance those characteristics, features and areas of the Residential Area that contribute positively to the City's distinctive physical character and sense of place);
- 4.2.3 (Ensure that new development within Residential Areas is of a character and scale that is appropriate for the area and neighbourhood in which it is located);
- 4.2.4 (Ensure that all residential properties have access to reasonable levels of residential amenity);
- 4.2.7 (To facilitate a range of activities within Residential Areas provided that adverse effects are suitably avoided, remedied or mitigated, and amenity values are maintained or enhanced);
- 4.2.8 (To maintain and enhance natural features (including landscapes and ecosystems) that contribute to Wellington's natural environment); and
- 4.2.12 (To enable efficient, convenient, and safe access for people and goods within Residential Areas).

In terms of the Proposed District Plan, it is clear from the proposed zoning that Council want the land to be continued to be used for residential purposes, as a residential zoning of the sites has been retained. The proposal is inconsistent with the following relevant objectives and policies of the Proposed District Plan:

- TR-O1, TR-P1, TR-P3 relating to transport, and in particular transport safety matters and that the public health and safety, including the safety of pedestrians, cyclists and micro-mobility users travelling through any parking areas, is not compromised;

- MRZ-O1 seeking that the zone provides predominantly for residential activities;
- MRZ-O3 seeking that the zone provides healthy, safe and accessible living environments with attractive and safe streets;
- MRZ-P9 requiring development to provide a minimum level of permeable surface to assist with reducing the rate and amount of storm water run-off;
- MRZ-P10 encouraging the retention of existing vegetation, particularly native vegetation and visually prominent trees that may not otherwise be protected, and where vegetation is proposed to be removed, seek new landscaping of equal or better quality to help integrate new development into the surrounding environment and minimise hard surfacing;
- MRZ-P11 encouraging development to achieve attractive and safe streets and public open spaces, including by providing for passive surveillance;
- MRZ-P14, which states to only allow non-residential activities and buildings that:
 - o Support the needs of local communities;
 - o Are of an intensity, scale and design that is consistent with the amenity values anticipated for the Zone;
 - o Contribute positively to the urban environment and achieve attractive and safe streets;
 - o Reduce reliance on travel by private motor vehicle;
 - o Maintain the safety and efficiency of the transport network; and
 - o Are adequately serviced by three waters infrastructure or can address any constraints on the site.