

IN THE MATTER the Resource Management Act 1991

AND

IN THE MATTER of the Proposed Wellington City District Plan

HEARING REFERENCE Stream 1 - Strategic Direction

**STATEMENT OF EVIDENCE OF EVITA KEY ON BEHALF OF
FOODSTUFFS NORTH ISLAND LIMITED (FSNI)**

PLANNING

3 FEBRUARY 2023

1. INTRODUCTION

- 1.1 My full name is Evita Caroline Key. I am a planning consultant and senior associate at Barker & Associates Limited, an independent, specialist planning and urban design consultancy with offices throughout New Zealand. I hold a Bachelor of Science with Honours from the University of Canterbury and a Post Graduate Diploma in Resource Studies from Lincoln University.
- 1.2 I have over 20 years' experience covering a wide range of planning matters on behalf of local authorities and private entities in New Zealand, Australia, and the United Kingdom. During that time, I have been involved with many aspects of planning including preparation and lodgement of resource consent applications, submissions and presentation of evidence to local authorities in respect of resource consents, proposed plans, and plan changes.

2. CODE OF CONDUCT

- 2.1 I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2014. I have complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving evidence. 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 written evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

3. SCOPE OF EVIDENCE

- 3.1 My statement of evidence addresses the Definitions section within Part 1 of the Wellington City Proposed District Plan ("PDP").
- 3.2 I have reviewed the Council officer's s.42A report and respond to matters raised.

4. SUPERMARKET DEFINITION

- 4.1 I support the retention of the definition of supermarket, as notified.

5. RETAIL ACTIVITY DEFINITION

- 5.1 I support the retention of the definition of retail activity, as notified.

6. COMMERCIAL ACTIVITY DEFINITION

6.1 I support the retention of the definition of commercial activity, as notified.

7. LARGE FORMAT RETAIL DEFINITION

7.1 I support the retention of the definition of large format retail, as notified.

8. NESTING TABLES

8.1 I consider nesting tables to be a valuable tool that should be included within the PDP. Their main value is that a specific activity can be provided for within a broader activity where effects may be similar or individually where the activity status of a broader activity may not be appropriate for a particular zone. They are a helpful way of organising similar terms to enable linkages and interrelations between terms to be clear. Nesting tables are also helpful to simplify plan provisions by reducing the number of individual activities that need to be referred to in any given objective, policy, rule or definition.

8.2 I note that section 7.2 of the s.42A report supports the inclusion of nesting tables and recommends that they are developed and included in the PDP (refer HS1-Rec117). I support this recommendation for the inclusion of nesting tables.

9. CONCLUSION

9.1 I consider that it would be appropriate to retain the notified definitions for supermarket, retail activity, commercial activity and large format retail.

9.2 I consider that it would be appropriate to include nesting tables within the PDP and support the recommendation within section 7.2 of the s.42A report (refer HS1-Rec117).



Evita Key

3 February 2023