



## **MINUTES**

**SUBJECT: FRESH CHOICE HEARING**

**WHEN: Monday 03 October 2023**

**WHERE: Greytown Town Centre Building: 89 Main Street, Greytown**

### **ATTENDEES:**

**For Woolworths NZ:** Allison Arthur-Young (Russell McVeagh) Sylvia Barnett (Russell McVeagh) Daniel Shao, Pip Clifford, Kay Panther Knight (Forme Planning) Richards Peers (Peers Brown Miller) Leo Hill (Commute)

**SWDC Council Officers:** Honor Clark, Harriet Fraser, Ian Bowman, Becks Geddes (Coordinator/minutes)

Kendyll Hammond (SWDC) Tim Langley (SWDC) Anup Dahal (SWDC) Russell O'Leary (SWDC) Hermoine Kemp (Dentons) Roxanne Hilliard (Waka Kotahi) Bella Cleary (Wairarapa Times Age) Carolyn Wait, David Lloyd, Michelle Dawson, Ian McDonald, Gerald McGreevy, David Ross, Carmel Fergusson, Gina Jones, Lorraine Hall, Raewyn Crowley; Sija Spaak, Frank Minehan, Lorraine Hall, David Ross

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### **Hearing started 9am**

**Introduction:** Commissioner Lindsay Daysh opened the hearing with an induction of himself and those present. Commissioner Daysh and gave a rundown of the proceedings and expectations before handing to the applicant. Questions are only asked by Commissioner Daysh and answered by the witness.

**Alison Arthur-Young** opened for Woolworth NZ by giving a summary of legal submissions, brief outline of evidence and proposal and explained the current onsite access requiring trucks to reverse out of the customer carpark.

Assessment is detailed - proposal is consistent with relevant provisions of WCDP.

s104 – Does not require strict compliance – Decision maker must consider s104.

Alternatives - Lack of formal assessment by Waka Kotahi, Alternative designs included a shop front suggested.

Q) Why can't the alternatives be achieved?

A) In preparing and assessing proposal when re-applying many alternatives were considered in the end alternatives, they were not helpful as still does not give access to Main Street

Q) Why in submission reference to Man o War why is it applicable in this case?

A) Footnoted this case simply for legal principle

**Tree** – Is proposed to be retained. Mr Peers to speak to proposal for tree maintenance.

**Signage** – Mr Knott to speak on signage proposal - New Signage has been carefully considered look/size. Illumination linked to business hours.

**Traffic and Safety** – Confidant minimal adverse effects on safety/ efficiency of network. Current onsite reversing pose safety issues. Priority given to pedestrians.

Commissioner commented on Comprehensive and thoughtful application.

Q) What standards are breached? Discretionary Activity can consider all matters regardless of whether standards have been breached or not?

A) Yes

**Daniel Shao** - Corporate Statement - Read to his evidence.

Refer to Appendix 1

Q) Tree retention common theme of concern, why apply for Code of Compliance (CoC) to fell tree?

A) CoC confirms a 'right' under WCDP to fell tree. This Proposal is to retain tree.

Q) Two key matters loading/unloading or visibility – which is more important?

A) Both are important, and both can be achieved, would not rank one more than the other.

**Richard Peers** – Arboriculture - Read to his evidence.

Refer to Appendix 2

Q) Pruning required to get to 4.25m for trucks. How many lower limbs will need to be removed. It is a substantial amount? What shape would be and effect on tree shape would it be uniformed?

A) Understand of canopy only, Could provide a photoshop like what this would look like.

Q) Age of tree

A) Estimated to be 80 years old

Q) Are you happy the conditions will manage effects?

A) Yes, under strict consent conditions, cant think of a single fal

Q) CoC – Would there be merit for listing Tree

A) Using evaluation system, would like the grade for listing

Q) Water course, where is it. Hard to see?

A) Along the northern boundary, Drainage channel not natural

**Richard Knott** – Urban Design and Heritage - Read to his evidence via Teams

Refer to Appendix 3 -

Q) Main Street frontage – Existing house usual for that section of main street, proposal adds a new element? Difference between a house setback/low usage to something that will be vehicle dominated?

A) Large vehicles will be low. Other vehicles would normally use Hastwell Street. Effects of vehicles using this access no effect on Heritage values. Development to either side has only been developed in the last 10 years or so. Entrance to Motel more harsh physical evidence than proposed.

Q) Entrance to motel wider? Vehicles in and out of Motel would be sufficiently different from vehicles in proposal?

A) Similar to where people turn in from Hastwell Street to a driveway entrance

Q) 5.2(a) How does that relate to heritage values of Historic Heritage Precinct (HHP)

A) Having a supermarket all linked to economic benefit to overall maintenance of HHP.

Q) 5.2(1) Existing distract from the current or is it natural

A) Natural

Q) 6.4 Greytown Heritage Trust (GHT) don't other council have other groups/panels – no statutory requirements but seen as contributing to a good discussion eg, Iwi

A) Slightly different to an Urban design panel. Professional people stepping away from their expertise

Q) 6.7 Aims of HHP in design guide local contest is it a material criticism?

A) Objective material criticism, for decision making

Q) Is the design guide there not relevant here?

A) Design guide is about buildings therefore limited value to assessment of this application

Q) Why did the applicant put in a CoC to show tree could be felled?

A) Comments in S42a not appropriate Re; retention of tree must of concerns locals, but not appropriate for planner to say this also.

Q) Disagree with Mr Bowman 6.20

A) 6.2(e) Bit you can see is a more recent addition glimpse views of side elevations, buildings are generally small, built at different times.. Natural that can see more of the side of neighbouring building.

Q) Landscaping Strip, Is it just leftover land? Can you a reasonable plant in gap?

A) No, bit horse can achieve something with a bit of bulk/colour in 2m

Q) Can you get any landscaping with any height?

A) Clearly not a tree, but something with bulk and softens buildings not full height of elevation

Q) Disagree with GHT 7.3 – Is it desirable to maintain HH values?

A) Objectives & policies don't require enhancement, but think proposal is a positive

Q) Have you been here in Summer? When it is popular on weekends, difficult to get a car park. Does widening from 3m access to 8.3m access contribute to maintaining HH values?

Q) Footpath continuation done & landscaping scheme – Natural

**Leo Hill** – Traffic / Transportation – Read to his Evidence.

Refer to appendix 4

Change to 2.30( c) changed highly unlikely to unlikely

Q ) Discussion with Mr Church from Waka Kotahi – Some agreements but some not , are that far apart? Why his views are different?

A) Closer in growth rates / modelling – subjective difference 'more art than science' looked at other driveways to form opinion

Q) Travelling South, Hastwell street or right turn in – What's legibility of site – Wont see sign? How do you know this is an entrance to Supermarket?

A) Sign will be visible, operating up on driveway (low speed avg 20km/ph due to pedestrian crossing)

Q) Mr Chrich issue is right turn in? Not much distance 40m?

A) Always been on more directional signage

Q) No more visibility of site travelling south? See access but won't know it's a supermarket access?

A) Mr Hill concurred this was fair

Q) Truck movements decrease from application lodgement? One of the aims is to improve carpark safety? Any safety records of conflict between servicing and vehicles/ pedestrians?

A) None of this site aware but there are OSH issues

Q) Total vehicle movements small proportion?

A) .3% heavy vehicles



Q) Pedestrian safety, summertime peaks/weekend peaks increase in conflict points? Can these been well managed?

A) Yes, been here in the weekend regularly

Q) Pedestrian on footpath, potential for conflict?

A) Vehicles could still use Hastwell Street. Pedestrians have right of way no effect because of

- Low speed environment
- Review of other entrance way
- Low volumes of pedestrian / vehicle movement limits conflict

Q) 5.20 degree of saturations? 2.66 to 2.77 level of service?

A) Difference of giving way vs not giving way Delay but can relate to Level of service

Q) Is supermarket the highest traffic generator in the town?

A) Yes

Q) Are you confident that Mr Chrich is exit only is better?

A) Both options are safe?

Q) Existing activity all ok – No safety problems recorded? Can nothing be done to existing design to reduce conflict?

A) None recorded; haven't looked at changes that could be done.

Q) Why Concave Mirror?

A) Helps truckers

Q) Comparing other Wairarapa Supermarkets – Aren't they different?

A) Circumstances applicable, busy highway

Q) No new access between existing buildings?

A) No

Q) Min separation distances – "existing don't comply" is that just driveways or high generating?

A) Just general, but still satisfied

Q) Proximity from Hastwell Street? So close, why efficiency already OK from traffic point of view?

A) Yes

Q) 7.18 Decrease because of Covid?

A) Yes – Not back to pre-covid levels

Q) 7.19 times around schools times (3-4pm) isn't it a bus time?

A) Busy time, but not a busy as 5pm (close to dinner time)

**Kay Panther Knight – Planning** Read to her evidence.

Refer to Appendix 5

Q) CoC regarding the Cooper Beech tree, would/could this be removed if applicant is unsuccessful ?

A) Yes

Q) Permitted base line, is it really relevant or in the round?

A) Is relevant to consider 'in the ground' Maybe sign has permitted baseline, but others don't really apply.

Q) Activity status of access is in dispute with other planners, are you happy for me to consider the site on totally or 134 Main Street?

A) Happy for you to do that, landed differently even if, assessment is fulsome. Rebuttal that can address all matters doesn't with heritage and traffic.

Q) 123 Main Street- Activity ? Traffic generation why?

A) Planning consultancy, less traffic

Q) Supermarket "industrial" Utilitarian building in design isn't part of Main Street?

A) Industrial or Utilitarian are different, features / finishing ie Weatherboards – Urban design part of the design now. Size gives it utilitarian feel/look

Q) Been here in Weekends? Removal of on-street parking?

A) 2 Car parks is negligible – reply on Mr Hills evidence

Q) Fencing 2.4m high – decrease to 1.8m to continue line of excising fence?

A) Might need to talk to neighbouring property.

Q) Draft Conditions – Difference between Ms Clark and yours

A) 3-4 to advice notes 4-6 Landscape plan

Q) to Achieve a certain outcome input advisory capacity?

A) Heritage architect/ Landscape architect involved

Q) Any conditions on wider supermarket Carpark – minimal?

A) Could do

Conditions 6 & 8 Stone wall retained Construction – Clarity around noise

18-34 Mr Peers evidence – Tree methodology (33/34) replacement of tree> Not to do a failing

11 – Incorporated elsewhere rewording

Q) Why loading until 7pm? Isn't it in the mornings generally ?

A) Existing consent conditions loading dock noise standards in district plan. Loading is normally in the morning and completed by early afternoon

14 – More specific and reference guidelines

15 – time of lighting sign links to opening

16-17 Some moved to notes

27 or as s42A – Nothing unique / different from the suggested on s42A

- **Lunch**

### **Submitters**

#### **Gerard McGreevy on behalf of Peter Ratner and Caorl Walter #33**

Spoke to submission – refer to Appendix 6

Q) Platoon/Clusters of vehicles purely observation?

A) Yes – hard to get into SH2 now since increase in speed limit

Q) getting into and out of Supermarket an issue? Do friends find it difficult to find?

A) Not an issue. Please to have a supermarket here, but not always principal shop/supermarket. Local convenience store of a reasonable size

#### **David Ross – Greytown School board of Trustees #9**

Spoke to submission – refer to Appendix 7

Q) Population roughly split by SH2?

A) Skewed towards the West due to future developments

Q) Does the school have data on number of children that walk to school, walk to school programmes?

A) Flat, compact town, kids are encouraged to get to school themselves. "Moving March" School Children also tend to Scooter to school as well.

- Principal Paula Weston spoke that at least 30 after school children through Stella Bull Park

Q) Pedestrian pathway would be of benefit to school children?

A) Could potentially use new pathway, but then have to cross carpark which is a concern.

#### **Michelle Dawson and Ian McDonald #2 0 Greyfriars Hotel**

Spoke to submission – refer to Appendix 8

Q) 4m High wall? High? What is layout of units? Non sleeping not on same side as Supermarket?

A) Units 1-5 face site on Sleeping side

Q) Sun, shading of 4m wall?

A) Already shaded – No effect

Q) Hours of supermarket? Servicing?

A) 7am servicing – Open to customers 7am – 9 pm Deliveries from 6am

Q) Can trucks go onto your site?

A) Small truck, once a week for recycling& Stay maybe 4 times a year

**Greytown Heritage Trust (GHT) #20 – Carmel Ferguson, Gina Jones & Peter Rowlands on behalf of Richie Hill**

Spoke to submission – refer to Appendix 9 & 10

Q) Where is Lancewood

A) Along Southern boundary, behind Alluminus

Q) Impact on Heritage?

A) Greytown as a whole, community hinge together

Q) Impact on other Heritage resources?

A) No issues with the house being removed, width of driveway like “front tooth” being taken out.

Q) No acoustic evidence? Normal hours of operation and servicing vehicles?

A) Impact on businesses – Motel and Alluminus

**Waka Kotahi #55**

**Hermione Kemp – Legal Council**

Ms Kemp summarised and read form part of evidence provided

- Conflicts – as many as 500 per day
- Safety issues adverse effects
- Support cycle/pedestrian connection/safe through to West Street
- Supports built on site shop front.

- Vehicle options provided – positions preferred that should be declined.
- Permitted base line is not useful

Q) Heritage Matter, How does this align, Not really traffic & transport planning?

A) Access & how it fits with Street Landscape. Holistic approach width of access and interrelationships with streetscape

Q) Traffic alternatives – Can understand? But not built to frontage; application is not for that>

A) Raised as possible alternatives, delving consent would enable consideration of alternatives as suggested.

**Roxanne Hillard – Wellington Transport Alliance Manager**

- Road classification makes it unsuitable.
- 8.2m driveway – tight evidence & Mapping of the tracking not clear
- Driveway is not an intersection, road not up to specification & maintenance.

Q) 1 x B train and 6 rigid axle trucks per day? Will that cause issues?

A) Shoulder etc not constructed as an intersection

Q) What about the haulage company, with greater movements

A) Has had to be strengthened

Q) For this level of truck movement? Eg Elsewhere ? Is this a real big problem?

A) e.g Harvey Normal site in Masterton – did testing slope of pavement will need re-design of accessway 6.40 in evidence

**Terry Church - Traffic Engineer** - Read to his evidence.

Refer to Appendix 11

Q) Conflicts – Mr Hills thinks you have “over-cooked it” why driveway when so close to existing Hastwell Street – Where do you agree with Mr Hill

A) Not Much, SIDRA is evaluation of intersections. Engineering judgement – any tool would say it would perform operationally, but doesn’t count for pedestrians. Doesn’t consider site, width of access etc.

Q) Reduction in heavy Vehicles

A) Concern is customer vehicles & After hour use. Heavy vehicles can be managed. Bigger concerns 50 vehicle per hour using access (500 per day)

Q) Record on site of H & S issues registered?

A) No knowledge for this site.

Q) New pedestrians crossing – Why shifting closer to intersection?

A) Not involved in design but moving away from pedestrian path to make pedestrians thinking before entering road.

Q) 9.41 Why figure 7?

A) To achieve that layout would need increase in height of carriageway choose that because of cycle lane, Would require removal of car parks both sides.

**Kathryn St Amand – Expert planning evidence** - Read to his evidence.

Refer to Appendix 12

Q) Applicant want on 2 fronts – onsite safety & visibility to Main Street

A) More exposure to street can be achieved by pedestrian link and sign without vehicle access. Could remove car parks along the southern boundary, pedestrian connections to West Street, pedestrian crossing across loading area.

- Access of considerable width – landscaping wont mitigate that. A landscape plan would be helpful.
- ONF – Social and economic well-being of region. Another matter to consider under s104 & ONF aligns well with D.P

Q) Consent fully discretionary? Is that where you sit?

A) Yes

**Hearing closes for day 1**

## **SUMMARY STATEMENT OF DANIEL SHAO (CORPORATE) ON BEHALF OF WOOLWORTHS NEW ZEALAND LIMITED**

### **1. INTRODUCTION**

- 1.1 My name is Yiqiang (Daniel) Shao. I am a Development Manager at Woolworths New Zealand.
- 1.2 My summary statement will provide a brief overview of Woolworths' interest in the Site; key location and design considerations for supermarkets; our reasons for pursuing this application; and our response to the key issues.

### **2. WOOLWORTHS' INTEREST IN THE SITE**

- 2.1 FreshChoice Greytown was built by a local developer and opened in June 2012. The supermarket provides an essential service and forms an integral part of Greytown and the surrounding communities.
- 2.2 We do not own the land the existing supermarket sits on. We lease the land and, in turn, sub-leases the premises to the local franchisee and operator of the supermarket.
- 2.3 We own the property at 134 Main Street (the Site). We purchased the Site back in May 2013, with the view to achieve greater flexibility in site layout, improve access for customers and service vehicles, and improve visibility of the supermarket from Main Street.

### **3. THE APPLICATION**

- 3.1 The existing supermarket sits one row back from Main Street and with no direct access, or indeed good visibility from the road.
- 3.2 The existing supermarket site is also constrained for space with the current loading arrangement presenting challenges in terms of loading operations and customer amenity.
- 3.3 To remedy these issues, the present application seeks to provide a new entry-only access for customers and service vehicles from Main Street, with associated signage. This will:

- (a) improve access and on-site manoeuvring for loading vehicles, and
- (b) improve awareness of the supermarket and allow customers to access it directly from Main Street.

3.4 The present application was first lodged in June 2022.

3.5 Following lodgement, we liaised with Council experts and consultants in respect of the various aspects of the proposal, notably heritage and traffic effects. In response to the technical advice and various discussions with Waka Kotahi and the Council, we made the decision to revise the application, we submitted it and requested full public notification.

#### **4. KEY CONSIDERATIONS FOR SUPERMARKET LOCATION AND DESIGN**

4.1 Supermarkets rely on convenient access and good visibility. They are typically located on arterial routes, and usually situated in or on the fringe of town centres.

4.2 In these settings, ensuring safe and efficient traffic and pedestrian movements, both on-site and off-site, for customers and service vehicles, is an essential part of any supermarket design.

4.3 Arriving at a particular design involves a very thoughtful balancing of a range of factors including the functional and operational requirements of the supermarket, safety and convenience for our customers, land ownership and development considerations, and planning constraints.

4.4 In the case of Greytown, the Site was not available when the existing FreshChoice was developed, which meant that direct access onto Main Street was not possible at the time. The existing supermarket layout was the best that could be achieved but is far from ideal in many respects – particularly because there is no direct access or visibility from the Main Street to the store. I note that, by contrast, the two nearest supermarkets - SuperValue Featherston and New World Carterton – both have direct access from State Highway 2.

4.5 The absence of the Site from the original scheme also resulted in the current sub-optimal on-site arrangement.

4.6 Creating a new access that connects the supermarket to the Main Street addresses these issues.



- 4.7 We consider the current proposal strikes an appropriate balance between ensuring the safe and functional operation of the supermarket, while respecting the Site's context and managing adverse effects on the environment.

## **5. RESPONSE TO KEY ISSUES**

- 5.1 Key themes in the submissions opposing the application include traffic and pedestrian safety, impact (of the crossing and the sign) on the character/heritage values of Main Street, and retention of the Copper Beech.
- 5.2 Almost half of the submissions in opposition comment on the loss of the Beech Tree. As set out in the AEE and evidence, the Application proposes to retain the tree, and this decision has strongly influenced the current design.
- 5.3 Matters relating to traffic effects and pedestrian safety, as well as heritage concerns, are addressed in the application documents and in the evidence of Mr Hills, Mr Knott and Ms Panther Knight.

## **6. CONSIDERATION OF ALTERNATIVES**

- 6.1 Both Council and Waka Kotahi in their evidence are critical that Woolworths has given no consideration to alternatives. That is clearly not the case, given the range of changes proposed to the current application before re-lodgement. We have heard the concern of the community and made considerable effort to achieve a balance with the re-lodgement of the Application.
- 6.2 We have held a series of meetings with both Council and Waka Kotahi throughout the application process. While efforts were made to try and narrow issues between the parties, it became apparent through our engagement that Waka Kotahi would not support any form of customer access from Main Road.
- 6.3 As noted, this customer access is a critical aspect of our Application. I am confident, based on the technical advice we have received, and as set out in the evidence of our experts, that the effects of our proposal on the State Highway, are appropriately avoided, remedied or mitigated.

## **7. CONCLUSION**

- 7.1 Woolworths takes extremely seriously the management of customer, supplier and public safety, and acknowledges and is very proud of our place in Greytown. We are grateful for our ability to service the local community. We provide an essential service to the Greytown community and are invested in continuing this service, in a safe and efficient manner.
- 7.2 Considerable effort and care has gone into the design of the proposal, and a number of amendments have been incorporated to address the actual and potential effects of the proposed access and signage. I consider the current proposal strikes an appropriate balance between enabling the safe and functional operation of the supermarket, while respecting the local Greytown context and managing any adverse effects on the environment.

**Daniel Shao**

2 October 2023

# PEERS BROWN MILLER LTD

Arboricultural & Environmental Consultants

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## GREYTOWN FRESH CHOICE HEARING – SUMMARY OF ARBORIST’S EVIDENCE

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- Peers Brown Miller Ltd was engaged to provide arboricultural advice and guidance relating to the potential effects of activities associated with the proposal on the Copper Beech tree at 134 Main St. Our brief was to review two arborist reports that had previously been commissioned by Woolworths, and to offer any further advice that would assist Woolworths in their efforts to minimise such effects on the tree.
- I carried out two inspections of the Beech tree and its growing environment and found that I was able to suggest amendments to the plans that had been produced at that stage. Those suggestions had the objective of improving certain aspects of the design such that the potential impacts on the tree’s root zone could be lessened. The plans were subsequently changed to accommodate my suggested improvements, and I summarise those improvements below.
- The proposed driveway was drawn further from the tree; being reduced in width from 9m to 8.3m. This reduces the coverage of open ground over the tree’s root zone that was originally proposed.
- Three carpark spaces that were originally proposed to be constructed under the western canopy of the tree have been deleted altogether.
- The existing masonry wall adjacent to the footpath is to be retained in place and it will not be extended around the corner westwards. This eliminates a degree of ground disturbance that was originally proposed.

- I recommended that the proposed pedestrian pathway that is to be formed to pass past the southern side of the tree should be constructed as either a wooden boardwalk or an on-grade permeable surfacing system. The detail of this path has not been designed yet, but I understand the conditions of consent provide for supervision by an Arborist of the design and construction of the pathway passing behind the tree. Any ground disturbance associated with the construction method chosen must be approved by the works arborist as well.
- I have assessed that the required pruning of the tree's canopy in order to provide vehicle clearance can be undertaken with precision such that the overall form of the tree will not be significantly altered. The pruning would be undertaken by a qualified arborist.
- I have proposed that the quality of the open ground root zone of the tree should be enhanced with the addition of a supplementary soil/compost mix overtopped with aged tree mulch.
- I have devised a comprehensive suite of tree protection measures and appropriate works methodologies that have been offered as recommended conditions of consent, and thereby expected to be implemented. These are all outlined in detail in my evidence (7.1-7.18).
- I noted that many submitters had expressed concern about the effects of the proposal on the Beech tree. I acknowledge and understand such concern. However, I am confident that the improvements that have been made to aspects of the design of the new driveway and the commitment shown towards the care of the tree during the works, will provide assurance that the tree will be looked after to the greatest degree possible and that it will continue to thrive following the works.

## Appendix 3

### **Richard Knott – RC application by Woolworths New Zealand Ltd for a new vehicle access and signage at 134 Main Street, Greytown (Hearing 2<sup>nd</sup> October 2023)**

#### **Summary**

The site fronts Main Street within the commercial area. It is subject to a Historic Heritage Precinct overlay. I have been engaged by Woolworths to consider, assess and advise them on the heritage and urban design elements of the proposed scheme. With the proposal before you now (which includes the retention of the Beech Tree), I consider the proposal will not have a significant effect on heritage values.

The northwest side of Main Street has a range of narrow one to two storey commercial buildings directly fronting the street.

The site at 134 Main Street contrasts with this character as the existing building on the Site has a residential appearance and is set far back from the street frontage.

The existing building to be demolished makes little contribution to the Main Street environment and does not contribute to the continuity of building frontages.

Accordingly, its demolition will have little impact on the historic heritage values of the area.

Whilst the Beech Tree is not scheduled, it makes an important contribution to the enclosure and continuity of Main Street. The access has been designed to allow the Tree to be retained, which I support.

The width of the proposed access is not out of step with other examples seen within the HHP, and has been designed to allow the continued, safe, free flow of pedestrians across the site frontage.

Landscape planting along either side of the access and driveway will visually narrow the apparent width of the proposed access, maintain the existing planted character of the front yard area and with the retained Beech Tree will break views into the site.

The proposed externally illuminated sign has been designed to reflect the heritage character of the area. The colours on its face are similar to those already seen on signage at the supermarket.

The sign will be less dominant than a number of existing brightly coloured signs in Main Street, and as it is located at right angles to Main Street it will not stand out unduly in the street.

The new loading dock canopy is set far back into the site, and its design is in keeping with the supermarket building.

Additional glimpses of the supermarket building through the access will not have an appreciable impact on the heritage values of either the street scene or overall heritage values of the area, given the existence of other not dissimilar views.

In relation to heritage/urban design matters raised by witnesses for Waka Kotahi:

- Ms Hilliard and Ms St Amand (Waka Kotahi's planner and corporate witness) are concerned about the internal site pathway. The pedestrian pathway is straight and therefore has good sightlines from end to end. Planting alongside it will be selected to ensure that sightlines towards the pathway are available from the new vehicular driveway. Appropriate lighting can be provided (recognising the need to ensure that this does not cause lighting effects to neighbours and dark skies).
- Mr Church, Waka Kotahi's traffic expert, has queried why the internal site pedestrian pathway to the store does not link to West Street. It is only one of a number of routes that pedestrians can use linking from Main Street to West Street, including the very nearby Hastwell Street. The car park is a slow speed environment, without the existing truck turning movements which currently cause what I would imagine to be greater safety concerns. Pedestrians using the new cut through would be no more vulnerable within the car park, than shoppers would be. For these reasons I do not consider that it is necessary to extend a formal footpath through to West Street.

Overall, in my opinion the proposed scheme has been appropriately designed to mitigate the potential adverse effect of the demolition of the existing building, new access and alterations to the building and to ensure that the overall impression is that Main Street has a broadly continuous frontage of buildings and large trees as existing.

The proposed scheme will also support the existing FreshChoice supermarket, which makes an important contribution to the social, economic, and cultural wellbeing of the local community.

The scheme is not contrary to the aims and outcomes for the HHP set out in the ODP.

As such the proposal appropriately balances Woolworths' health and safety obligations (which need to be considered under the purpose of the RMA) against the need to protect the historic heritage values of Greytown from inappropriate development and will not have a significant impact on the heritage values of any of the nearby scheduled heritage buildings.

## Appendix 4

### SUMMARY

- From a transportation perspective, the proposal is simply for a vehicle crossing and driveway that is:
  - entry only
  - in a low speed urban 40km/hr zone.
- The driveway will service an existing supermarket. It will not materially increase traffic, noting there may be a small increase in pass-by traffic.
- The proposal will mean on site traffic safety conflicts will be able to be avoided – this is a significant improvement over the existing operation (trucks reversing within the carpark)
- The driveway will cater for approximately 1 large truck and 4-6 smaller service vehicles per day
- The traffic turning into the proposed driveway already turns off Main Street at the nearby Hastwell Street / SH2 intersection
- This intersection has no current reported safety issues even with the site's traffic and other turning traffic (2-3 times the turning volume as the driveway will cater for)
- The driveway will be designed to be a low speed one with priority given to pedestrians. The design of vehicle crossing with clear priority given to pedestrians by having a continuous / level footpath across the crossing is becoming very common and standard practice throughout New Zealand.
- This design is well used in Greytown, and appears to be based on a Wellington Standard and that the detailed design of a crossing considering splays, pavement strength etc is very common to be addressed at condition stage (detailed design / engineering approval).

- The modelling I have undertaken (with priority given to pedestrians) shows low levels of delay and queuing on SH2. The modelling has shown the expected queue turning right into the site will only reach one to two vehicles even with the additional sensitivity of 30% growth and 75% of all entry supermarket traffic has been used. Again, I stress that this traffic is already turning right at Hastwell Street and will thus simply be moved to this driveway.
- None of the supermarket driveways in the region show any issues with pedestrian / cyclist crashes (over 10 years). This is despite all of them serving the same use (supermarket) and a number being located on the same road (SH2), similar speed zones (40km/hr or less), and within urban locations within shopping areas.
- The upgrade to the pedestrian crossing proposed by Waka Kotahi will shift it approximately 15m further away from the proposed vehicle crossing (to be around 40m away) and will only increase safety in the area by further slowing vehicles and giving priority to pedestrians and cyclists. The modelling I have undertaken (including sensitivity testing) shows any queuing will not be near the pedestrian crossing and thus will not undermine safety benefits of this upgrade.
- Overall, I consider the driveway will operate safely and efficiently as proposed. It will also ensure on site traffic safety benefits of the reconfigured loading dock are achieved.



## Appendix 5

### **SUMMARY STATEMENT OF KAY PANTHER KNIGHT (PLANNING) ON BEHALF OF WOOLWORTHS NEW ZEALAND LIMITED**

1. Woolworths proposes to construct and operate a new access for customer and service vehicles, alongside signage and landscaping at 134 Main Street, in Greytown, associated with the existing FreshChoice supermarket. Woolworths seeks consent to demolish the dwelling currently located at the Site, construct a vehicle crossing and reconfigured loading dock, including a new canopy to the existing supermarket building. The proposal retains the existing Copper Beech tree and stone wall at the frontage of the Site.
2. Overall, the Application is a Discretionary activity under the Combined District Plan. My rebuttal evidence included a consolidated list of consent matters that I consider are relevant in relation to the Proposal. This is having considered both the Council's Hearing Report and Waka Kotahi's planning evidence.
3. Alongside advice from Woolworths' experts, I have assessed the Proposal in respect of all potential and actual effects on the environment as is appropriate for a discretionary activity and having regard to the Historic Heritage Precinct and State Highway designation that affect the Proposal.
4. In respect of transport effects, Mr Hills has set out how the proposed crossing re-distributes existing traffic on the network, with a potential small increase arising from by-pass traffic. Mr Hills has also assessed the Proposal in respect of network efficiency and safety, and in respect of safety for pedestrian and cyclists. I rely on Mr Hills' advice that the crossing is acceptable in respect of transport, including safety and efficiency.
5. In respect of historic heritage effects, Mr Knott has assessed all components of the Proposal in the context of the Historic Heritage Precinct and relative to nearby scheduled buildings. Mr Knott has identified that the features on the Site that contribute to appreciation of historic heritage and the character of the Main Street are the Copper Beech tree and the landscaped setback. In addition to the low stone wall, these features are all retained by the Proposal. Mr Knott also concludes that the proposed crossing, sign and loading dock reconfiguration are all appropriately designed, sited and oriented so as to

mitigate adverse effects on the historic heritage values of the Precinct and surrounds to an acceptable degree. Mr Knott considers that the proposed landscape plan conditions are sufficient to ensure appropriate mitigation of potential effects on historic heritage and urban design and I adopt that approach.

6. Concerns have been raised regarding the potential impact of the Proposal on the Copper Beech tree. I rely on Mr Peers' expert arboricultural evidence that the tree can be retained with appropriate and relatively standard tree protection conditions and construction methodology. Mr Peers' recommendations for construction of both the driveway and pedestrian accessway have all been accepted by Woolworths and incorporated into the proposed conditions.
7. I consider matters relating to stormwater, servicing and infrastructure, and those listed in the Council's Hearing Report are either not relevant to the Proposal or can be appropriately mitigated, as proposed through conditions. This is particularly the case in respect of the management of stormwater and in considering the water race on the Site.
8. Overall, I conclude that the Proposal results in less than minor adverse effects in all respects, including in consideration of character and amenity, historic heritage and transport, safety and efficiency.
9. I consider that the Proposal results in positive effects, as listed in my primary evidence (7.82), which can be summarised as
  - (a) improved public health and safety on-site with the reconfigured loading arrangement so as to avoid the need for service vehicles to reverse manoeuvre within the customer car park;
  - (b) retention of the Copper Beech tree;
  - (c) provision of an attractive landscaped frontage to Main Street; and
  - (d) efficient and convenient access to the supermarket.
10. I have undertaken a detailed assessment of the relevant objectives, policies, rules and assessment criteria of all relevant planning documents. I conclude that the Proposal is consistent with these provisions. Of primary relevance are those objectives and policies at Section 6 Commercial zone and Section

10 Historic Heritage, in the District Plan. I have assessed all relevant provisions within these sections in both the Application and in Appendix C to my primary evidence. I continue to consider that the Proposal is appropriate having regard to the planning framework, in reliance on advice from Mr Hills, Mr Knott and Mr Peers.

11. I do not consider it necessary to have responded individually to the listed assessment criteria in Section 22 of the District Plan. Further, I consider that those matters are already comprehensively addressed in the application, my planning evidence and that of Woolworths' other experts.
12. I consider that the Proposal is acceptable pursuant to section 104 of the RMA, taking into account positive effects and all other matters addressed in my briefs of evidence.
13. In my opinion, the Application should be granted resource consent on the conditions proposed in Appendix A to my primary evidence.

**Kay Panther Knight**

2 October 2023

**Additional Submissions on behalf of  
Peter Ratner and Carol Walters  
2 October 2023**

Fresh Choice is a small local Supermarket mostly meeting local need. The constraints of its site were known when it was established and like many sites in Greytown it is limited by its environment. An endeavour to turn it into a regional service may have the double effect of dampening its local usefulness while at the same time being unable to fulfil its greater ambitions.

In many respects this is a smorgasbord application. It was initially justified on the grounds of traffic safety and has now grown into an application for the fullest commercial utility at the expense of the Greytown environment.

In this respect the evidence of Mr Shao on behalf of Woolworths is worthy of comment. Despite this original application a being presented on the sole basis of health and safety concerns, Mr Shao, speaking on behalf of Woolworths, makes it clear that in fact customer access from Main Street was always a key reason. See:

Para 1.3: "Somewhat unusually for a supermarket within a "main street" town, the existing supermarket sits one row back from Main Street, State Highway 2 and **there is no direct access to the store from the main road, or indeed good visibility for customers from the road to the Site.**"

Para 1.4 (b): The present application seeks to, "improve awareness of the supermarket and allow customers to access it directly from Main Street."

Para 1.5: "Supermarkets rely on convenient access and parking, and a high level of visibility and are typically located on arterial routes for ease of access."

Para 5.4: "In the case of Greytown, the Site was not available when the existing Fresh Choice was developed, which meant that direct access onto Main Street was not possible at the time. The existing supermarket layout was the best that could be achieved **but is far from ideal in many respects – particularly because there is no direct access or visibility from the Main Street to the store.** I note that, by contrast, the two nearest supermarkets - SuperValue Featherston and New World Carterton – both have direct access from State Highway 2." PER NOTE < And NEITHER is in a historic district."

Para 7.3: "Good signage on Main Street is important. Considerable care has gone into the design of the proposed sign **to achieve its purpose of providing easy wayfinding for supermarket customers,** while responding to the look and feel of the Main Street. We believe the proposed signage is modest in scale, appropriate in its design and will integrate well with the surrounding built form."

This is further confirmed by Ms Knight's Evidence also concedes. At paragraph ^2: "Woolworths' motivation for the Proposal is two-fold. Firstly, the changes are required to address the current health and safety failings of the existing operation and supermarket layout that require service vehicles to traverse in front of the store, reverse manoeuvre in the customer car park into the service yard, and then exit through the car park again to leave the Site. **Secondly, visibility and direct access from a key arterial route, in this case a State Highway, are desirable for supermarket customer legibility and exposure to passing traffic** and the Proposal will ensure these factors are provided."

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Mr. Knott's evidence continues to proceed on the basis that the purpose of this is to address health and safety concerns. This is directly contradicted by the evidence of Mr Shao and Ms Knight (as well as common sense)

I think there is a key point to be taken from Mr Peer's (the Arborists) evidence.

He States:

"6.2 Paragraph 75 summarises various concerns raised by submitters opposing the application. The issue of the Certificate of Compliance being granted by Council has led some submitters to be sceptical of Woolworths' commitment towards the retention of the Beech Tree.

6.3 However, this commitment has always been my understanding and that this is the basis of my engagement to provide arboricultural advice and recommendations to ensure that the tree is successfully accommodated in the design of the proposal."

I note that he considers the tree capable of meeting the requirements for preservation.

Since the original Application stressed that the main reason for Proposal was to address a health and safety issue - for example, see page 3 of Mr Knott's original Urban Design and Heritage assessment." It turns out submitters were right to be sceptical of anything Woolworths says about the tree or anything else since their original application was, and was deliberately designed to be, misleading.

Also, in my reading all of their traffic information in the original application dealt with trucks turning in - in fact they said their assumption was most people would continue to use the existing access. They had not dealt with the cars turning into the driveway. They also made much of the fact that SH 2 will not be blocked because access will be limited for trucks BUT, in the Evidence of their traffic expert, Mr Hills, (paragraph 4.3(a): "Customers and light delivery vehicles (vans and light trucks) will turn both left in and right into the development, with large delivery vehicles only left turning into the site."

If you look at Mr Knight's original report, at page 4 he says: "It is noted that proposed works to the existing supermarket do not increase the retail floor area, and therefore no additional traffic is expected to be generated by the proposal." He repeats this statement on page 7, "As detailed previously, the proposed works to the existing supermarket do not increase the retail floor area, and therefore no additional traffic is expected to be generated by the proposal." Since Woolworth now admits that a key element of the proposal is to gain visibility from Main Street, it is clear that a key element and purpose of the proposal is to generate additional traffic. This makes his entire original submission suspect. If I read his original report correctly he does assume some turning vehicles but I cannot understand how he reaches his conclusions.

As far as I could see none of the experts dealt with the issue of traffic impacts on other streets. Partly this may have been because of the timing and positioning of their observations. At peak parts of the day and during school holidays and the like Greytown has many visitors. This causes some drivers to turn off at Humphries Street, proceed along West Street (quite often at speed) and exit back on to the Highway at Kuratawhiti Street and North Street. While the volumes may not be huge, they are constant and this poses risks to exiting onto West Street from Hastwell Street and the existing supermarket carpark and also causes problems at the intersections of Kuratawhiti and North



Street onto the main highway. A further delay caused by traffic turning into the Supermarket from Main Street will exacerbate this trend causing ripple effects in Greytown.

The chaos o busy days at the McMaster Street pedestrian Crossing and at Hastwell Street with people seeking to turn right (southbound) is pretty chaotic.

Mr Ratner and Ms Walters support the conclusions of the experts from Waka Kotahi and the Council Planner.

## Appendix 7

Kia ora koutou. I'm David Ross, and I hold the position of Presiding Member on the Greytown School Board of Trustees. I speak here today in that capacity.

Greytown School is a full primary state school comprising years 1 – 8. In contrast to the other main Wairarapa towns, we are the only primary school in town. Our roll is currently 361, and is projected to increase to approximately 400 by the end of 2024. Kuranui College, the state secondary school for South Wairarapa, is also projecting strong roll growth in coming years.

Our school is situated on East Street, almost parallel to the proposed development. Stella Bulll Park, across the road and slightly north of 134 Main Street, is a common thoroughfare for children and other pedestrians moving between Main Street and East Street, as shown on a diagram in our submission.

The Board of Trustees has a duty to ensure the safety our tamariki, and we consider that this duty applies not just within the confines of the school grounds. As far as we are able, we have a role in advocating for our childrens' safety as they commute to and from school, and indeed as they go about their lives within our community. We therefore feel that it is important for us to be here today to provide a voice for our students.

In making our submission we have been careful to focus solely on the safety aspects of the consent application, and I will continue to do so today.

I need to point out that there are no traffic experts on the Board of Trustees and we haven't taken expert advice. Our thoughts and opinions are those of amateurs, albeit amateurs who live in the community and have first-hand experience of traffic behaviour and patterns at the site in question. I hope that we are able to demonstrate that our concerns have validity, even if they have not been reached via an industry approved academic process.

In our submission we raised a number of points concerning the traffic assessment prepared by Mr Hills of Commute Transport Consultants on behalf of the applicant. Our overall impression was that Mr Hills' report understated the likely effects of the proposal on the roading and pedestrian network. Having read the reports and evidence both of Ms Fraser for Council and Mr Church for Waka Kotahi, I feel that our view has been soundly vindicated. They have made the case for this understatement more clearly than we possibly could have, and in a much more academically rigorous way.

That being said I'd like to highlight one point which I think demonstrates where Mr Hills' approach, while perhaps meeting industry standards, fails to reflect real world circumstances. Section 6.1 of his assessment states

(QUOTE)

*"The proposed works to the existing supermarket do not increase the retail floor area, and therefore no additional traffic is expected to be generated by the proposal."*

(END QUOTE)



This assertion is repeated in Mr Hills' evidence.

Mr Shao, at paragraph 1.4 in his evidence for the applicant, states the intended purpose of the new entranceway and associated signage.

(QUOTE)

*"...It will*

*(a) improve access and on-site manoeuvring for loading vehicles, and*

*(b) improve awareness of the supermarket and allow customers to access it directly from Main Street."*

(END QUOTE)

I'll come back to point (a) and the relative weighting of each stated purpose, but for now I'm going to go out on a bit of a limb and guess that by "improving awareness of the supermarket", Mr Shao is saying that they plan to increase custom to their store, and they intend to attract new customers via this new signage and entranceway. The cost of the proposed development, including this process, land acquisition etc I assume will be well into the millions of dollars, and it is logical that the applicant will be expecting a substantial return on their investment over time. However Mr Hills seems sure that no such return will be forthcoming, and therefore takes no account of that additional traffic in his calculations. We consider that the assessments of Ms Fraser and Mr Church give a more realistic assessment of the proposal's effects on the roading network

Again, our concern is with the safety implications for our tamariki using the pedestrian crossing south of Hastwell Street, and the footpath across the proposed entranceway. I'd like to show a photograph that was included on page 3 of our submission. This photo is taken at the entrance point of the crossing, from a height of about 130cm – the average height of an 8 year old child. You'll note that the Ford Ranger ute (NZ's favourite vehicle) completely obscures the view of the northbound lane from the child's point of view. The reverse would also be true – a driver in the northbound lane would be unable to see a child waiting, or already on the eastern side of the crossing. Now notice the blue ute in the northbound lane. They would be at almost the exact point a southbound vehicle would be waiting to turn right into the site. It's not hard to visualise the effect that even a two vehicle queue would have on visibility at the crossing, let alone the larger queues that will be likely during the peak time of 3:00 – 3:30pm. I'm aware that Waka Kotahi plan to relocate the crossing slightly to the north and make other improvements, however in their expert opinion the crossing will still be adversely affected by the proposal.

I want to look again at the applicant's stated reasons for the development. The first of these is to improve access and on-site maneuvering for loading vehicles, and it is mentioned a number of times that the current access creates a health and safety risk onsite. Mr Hills references this a number of times in his assessment.

After posting our submission we were invited to a discussion with Daniel Shao, the applicant's development manager. I'd like to thank him again for his time, and his willingness to hear our concerns first hand.

During our conversation I asked Mr Shao if, in the 11 years that Fresh Choice had been operating, there had been any accidents with loading vehicles onsite. He said that there had not. I then asked if there had been any near misses recorded. He stated that to his knowledge there had not. This certainly rings true, as I'm sure the applicant would have detailed any such incidents or near misses in their application, given the weight those incidents or near misses would have leant to their case. I would submit that whatever risks exist with the current arrangement, they have been successfully and professionally managed for the last 11 years, and do not endanger users of the supermarket.

I understand from online records that the property at 134 Main Street was purchased in 2013. This speaks to the fact that the Applicant has long intended this development, and their motivation is not some recent update to best practice in their Health and Safety policies.

I'm going to go out on another limb here, and guess that the applicant's primary motivation for the proposed development is therefore one of increased Main Street awareness – that is, increased custom and increased profit.

The pre frontal cortex is the part of our brain responsible for planning, prioritizing and, crucially, making good decisions. It is also one of the last parts of the brain to mature, typically doing so in our mid to late 20s. For anyone who has spent time around kids this is pretty self evident. We do our best to help them, we drum into our children lessons like "don't put that in your mouth", "don't play with fire", "you can't have cake for dinner" or "look both ways, and look again". But they do dumb stuff anyway, because they're kids and their brains aren't fully formed. We know this, so we lock our medicines and matches away. We decide what's for dinner. And we make sure they can be seen at pedestrian crossings. Because sometimes they'll get it wrong, and it's up to us to plan for those times, by making good decisions on their behalf.

Lastly, I would like to quote from the evidence of Mr Terry Church. In his conclusion he states

(QUOTE)

*"I do not support the proposed access at 134 Main Street. The proposed access does not comply with safe engineering requirements and will lead to significant safety and operational concerns to all users of Main Street."*

(END QUOTE)

The applicant wishes to increase the profit of an already successful business, and resolve a safety concern on their private property (as far as one exists), by creating significant and ongoing risks to the general public on a public road, that will disproportionately affect our tamariki.

We have always considered Fresh Choice to be an important part of our community. They're supportive of so many good initiatives for our kids. They're generous with their donations to charitable causes, and in their support of our sports teams. However what Woolworths proposes goes completely against what it means to be a good corporate citizen. I ask them to think carefully about their position in the community, the thousands of collective hours that we the community have spent addressing this and previous proposals, and what effect continuing with this process will have on our collective goodwill. I ask them to genuinely consider not just the evidence that they have commissioned, but all the evidence presented during this process. I ask them to join us in making good decisions for our kids.

On the basis of safety concerns, the Greytown School Board of Trustees respectfully requests that the application be declined.

## Summary of points

1. Current proposal is regarding truck and customer vehicle access, not street facing extension of storefront.
  - a. Easy pedestrian and cycle access to the supermarket storefront already exist closely via Hastwell St.
2. Truck turning and Road Degradation
  - a. Road width designed as town established in 1878, no ability to widen SH2
  - b. Currently Countdown truck turns wide from the middle of Hastwell St into Main Street turning left across the centre line.
  - c. Distracted drivers, cars and trucks, we often hear the screeching of brakes
  - d. High potential for accidents
  - e. The road degradation from weight of an average of 10 b-train trucks per day on local roads around 44 to 50 tonnes – ratepayers cost.
  - f. In-depth information provided by Mr David Lloyd
3. Pedestrian Safety
  - a. Visitors to Greytown, including Greyfriars Motel guests.
  - b. Families
  - c. Wheelchair, mobility scooter and pram users
  - d. Unaccompanied Children
4. Noise
  - a. Greyfriars Motel guests sleeping or relaxing and Alluminance customers relaxing for treatments – both are compatible with other local businesses
  - b. Loading dock changed from 7am – 3pm to 6am – 3pm
  - c. Proposal includes increase from 1 to 10 b-train trucks per day
  - d. Refrigerated trucks mechanical unit stands on average at 3.86m tall
  - e. 4m acoustic fence to minimize noise, not 2.4m as proposed
5. Stormwater
  - a. Regular downstream flooding of Church and East Streets of half of street and corner footpath
  - b. Cahoots flooded inside, Greytown Pharmacy sandbagged doorway, Greyfriars Motel carpark flooded for 3 hours

## Summary

We would like to see the Woolworths NZ Limited resource consent rejected but should it proceed, the suggested resource consent conditions incorporated.

Woolworths can do all the work in the world and dress it up in legal speak around safety and access but truck drivers are human and they make mistakes despite how "safe" something might appear to be. You only need ask the person on a mobility scooter who was hit by a truck on crossing in Greytown when the driver was looking at his phone.

Comparing the motel entrance to the proposal is redundant as the vehicles entering and leaving the motel aren't 20m long truck & trailer units, they're cars and the odd van.

## Appendix 9

### SPEAKING NOTES FOR 134 MAIN ST HEARING

Kia ora koutou, Hello, I am Carmel Fergusson. I am Chair of the Greytown Heritage Trust and I have been involved in several capacities with the Trust since 2013.

Yes, we are a group of committed volunteers, many of us with specialist skills and professional backgrounds that key into the work of the Trust. The trustees are passionately committed to the aims of the Trust. These aims are set out in our foundation Constitution of 1993 – two of these aims are particularly pertinent to this hearing, that of:

- encouraging and facilitating the preservation of Greytown's contextual, cultural and environmental heritage within the 'Town Centre Precinct', and
- encouraging and facilitating the preservation of historic and notable trees, in and around Greytown.

The Trust notes the Applicant and their experts evident lack of understanding of Greytown. Greytown is a small South Wairarapa town of a very particular identity and style that complements and contrasts with neighbouring Carterton, Featherston and Masterton. It is apparent that the applicant and their experts do not understand the context of the site identified for development within the Historic Heritage Precinct in Greytown and the importance of the many neighbouring small businesses which occupy the modest timber buildings on Main Street. These highly individual businesses and the consciously managed environment, bring and create wealth in Greytown and for the region.

The unique and independent businesses draw people here. The supermarket, while a valued service and provider, is not in itself, a drawcard for visitors. The position of the supermarket, away from Main Street but with convenient access from West Street, ensures a distinct and protected environment for routine grocery and provision shopping, serviced by a purpose-sited car park and a neighbouring public car park. West Street was widened in the 1960s for exactly such a purpose, as an alternative route to Main Street.

West Street is increasingly used by locals to ease access through and about the town, accommodating the new 40km speed restrictions and the Main Street congestion. The oversize supermarket signage in place is already clearly visible from Main Street, and there is additional street signage.

This town is a special place, it's a product of its past, with a conscious engagement with its future. The Applicant shows a worrying lack of understanding of the wider influences and impacts of environmental stress, climate change, challenged biodiversity and species depredation. The town consciously promotes and nurtures an environment for which cycling and walking. Greytown is a key component in the Wairarapa Five Towns Cycle Trail which is gaining considerable traction as the route expands to meet its ambition of linking South Wairarapa towns.

The preservation of the tree canopy is an imperative in mitigating against flooding and in the moderation of temperatures. The importance of street trees in every urban environment is



internationally acknowledged and will continue to grow as a focus for planners. Greytown is privileged to have some of that arboreal wealth already in place. Its trees need to be cherished, nurtured and protected.

The Trusts submission has been led by Gina Jones who has been the trusts architect advisor since Max Edridge handed over the reins in 2007. Gina holds a Master of Fine Arts from RMIT University in Melbourne, a Bachelor of Architecture with 1<sup>st</sup> class honours and a Bachelor of Building Science both from Victoria University in Wellington. She is a Fellow of both the NZ Institute of Architects and the NZ Institute of Building both since 2001. She is a Chartered Building Professional and Past President of both the NZ Institute of Building and National Association of Women in Construction which she also founded. She is currently chair of the NZ Registered Architects Board. Gina has also undertaken training in the Conservation of Traditional Buildings and Cultural Heritage Management at the University of Canberra Donald Horne Institute for Cultural Heritage. Gina has been a Greytown resident since 2001. Gina will speak on some additional points we have regarding the Expert Evidence. Normally Gina would have presented as an expert witness, but she is suffering from prolonged concussion after a mountain bike accident, so we have modified our approach.

Richie Hill is a former trustee of the GHT and arboreal expert of national and international experience. Richie will speak further on the two trees of significance on site: the Copper Beech and the Horoeka or "Lancewood" which are both high value assets to the Historic Heritage Precinct of Greytown.

We note that while there has been a certificate of compliance issued by the SWDC for the permitted activity of the removal of the copper beech Woolworths have relied on retention of the Cooper Beech as the main mitigation of the very many adverse effects of the proposal on the Historic Heritage Precinct and the streetscape. The Trust remain unconvinced that the mitigation measures proposed will ensure the trees survival. The fate of the Horoeka appears to be 'removal for a footpath' which could easily be avoided.

Since submissions have closed, we have been gathering history on the Copper Beech, we have been told that the tree on Main Street is likely to be a seedling from a tree planted in 1912 by Maata Mahupuku Mansion and her husband, at 46 Kuratawhiti Street Greytown ('Elmwood') following the birth of one of their children.

The owner of Elmwood for the last 18 years, tells that apart from the historic Copper Beech tree, there was also a row of nine Copper Beech along the western boundary of his property at 46 Kuratawhiti Street. This plot is one of the original sections formed for the Small Farms Association. Three of these trees still remain and there is an echoing row of seven large old Copper Beech on the eastern boundary.

For the previous fifty years, the house and its wonderful garden were the residence of Betty and Jack Thompson. They were both active and prominent members of the Greytown Beautification society and responsible, along with other members, for planting many trees in Greytown. Betty

Thompson was a gardener of standing and their garden, at Elmwood, 46 Kuratawhiti St, has been celebrated in magazines and books.

The current owner was visited by two Thompson sons, and the late Jan Eagle; Jan was Betty's niece and Stella Bull's daughter (the one whom the park local children use to get to school after using the crossing near 134 Main Street was named after). They shared the story that the trees at 46 Kuratawhiti St were seedlings from the original Copper Beech tree that Maata Mahupuku Mansion planted.

Betty and Jack, it was said, in their work with Greytown Beautification society and with their gardening friends, planted other seedlings from this tree in numerous locations in and around Greytown, including in the Main Street. This explains and why there are older copper beech in the town. Its highly plausible, given its size and age, that the Copper Beech tree at 134 Main Street is one of these seedlings from the tree planted by Maata Mahupuka Mansion.

As an aside, Maata Mahupuku, also known as Maata Grace, was a schoolgirl friend of Katherine Beauchamp, later known as the famous author Katherine Mansfield. They later reunited in London after Maata had been to a French finishing school.

The essential notion is that Greytown is reasonably unique in small town NZ in having identified, protected and curated its architectural history. It feels arrogant to scar this integrity for the sake of a truck accessway.

**INVITE GINA TO SPEAK**

**INVITE RICHIE TO SPEAK**

### **Summary**

We disagree with the Applicants Experts conclusions – the safety issue they are addressing are purely potential and perceived issues which have previously been managed successfully with no reported incidents or near misses for over a decade. The proposal creates far more safety issues for the community than it resolves. The existing experience shows that there is actually no way of ensuring trucks use the route prescribed, the queuing is already greater than the one vehicle modelled, the loss of carparking is detrimental to the existing Main St small businesses.

The GHT disagrees with the Applicants expert conclusion. The GHT oppose this application and we also oppose the Waka Kotahi proposed alternatives of a truck exit only from the site. Firstly because of the damage, even with the revised option, it is likely to do to the Copper Beech and the Horoeoka, the unchangeable negative effects this would bring to the town's heritage values, but primarily because of the safety issues which accompany this proposal. This would be the ONLY driveway in the Greytown Historic Heritage Precinct (including the Greytown Residential Extension) which would be catering for vehicles the size of B-Trains AND the predicted number of trucks per day – this is totally incompatible with the aims of the District Plan and the Historic Heritage Precinct and with the quintessence of Greytown.

Ngā mihi maioha



## GINA

**Main St Traffic.** The GHT have reviewed the Experts evidence, and we support the evidence provided by Mr. Church on behalf of Waka Kotahi, with regard to Traffic, with the exception of the Alternative options at 9.59 – 9.72. This would be the only premises where such large trucks turn from a driveway on Main Street within the Historic Precinct. This GHT opposes this alternative due to the pedestrian truck conflict, the issues surrounding the trees long term survival and the other issues which remain unresolved from our submission.

The GHT also supports the evidence provided by Ms. St Amand on behalf of Waka Kotahi, with regard to Planning, with the exception of the Second preference (mitigate) under 1.11 for the reasons noted earlier.

The commentary in Mr Hill's Traffic evidence is most concerning. It would be nice to think that all B-trains enter the site at illustrated in figure 5 of his evidence (existing route) – that is simply not true. This September 2023 photo of a B-train exiting from Hastwell Street was put up on a local Facebook page recently to illustrate the issues and is referred to in David Llyod's evidence. This is not an uncommon sight as locals will attest to. Clearly there is a major disconnect between what the Applicant thinks is happening and what actually happens and shows that the way trucks travel is clearly unable to be controlled. The situation the photo illustrates will be exacerbated with the proposed route at the intersection of West Street and Humphries where trucks exit onto the much narrower Humphries Street (which for non-locals) is the route to the Wairarapa Five Towns Cycle Trail and the only road to the railway station. This will also occur when trucks exit Humphries Street onto Main Street but crossing the turning bay, which could of course have cars approaching or on it. Given that Woolworths are clearly unable to control the route trucks take, it would be much more likely they will just travel down Main Street and turn right into the site – or exit as illustrated in the photo rather than as described by Mr Hill. There is also a disconnection between the Applicants other experts where they note that trucks 'often pass directly past the store's main entrance' which is clearly not required if the route Mr Hill discusses as existing is followed.

Regarding Mr Hill's comments at 3.11, we would like to point out that these are the 'reported' crashes. Because of the speeds through Greytown MOST crashes are not reported, all locals will be aware of the high number of crashes (particularly at the pedestrian crossings with distracted drivers) and the huge number near misses. Near misses and a lack of serious injury is just a matter of good fortune, and any of these are what needs to be mitigated against.

We also note that in Attachment A Commute drawing A2, the blue dotted line is the clearance envelope to the swept path of the truck – this is important when looking at vehicle tracking as it allows for the differences between the design truck and a real truck; variation in the paths steered by different drivers; some clearance to avoid the vehicle contacting any objects and components such as rear-view mirrors extending from a vehicle. The diagram shows the truck travelling along and turning off Main Street over the centre line using the clearance envelope, knocking out the stone wall and a pedestrian that they couldn't see waiting at the vehicle crossing along the way.

Little consideration has been given, where trucks and other vehicles using the driveway, and pedestrians combine on site. We see this as creating greater risks to pedestrians and other vehicles particularly with regard to blind spots. We are a community with a higher-than-average number of elderly residents who won't have either the peripheral vision or agility to avoid trucks – we have a growing preschool and school age population who will not have fully developed traffic awareness skills and will not be expecting to avoid trucks particularly at the footpath at Main Street. Even more so, when the driveway is wider than the width between parked cars of nearby Hastwell Street causing confusion as to who has priority.

Our population is growing – the population is considered to be around 2,800 at 2022 which was an 11% increase on the 2018 census, which was a 10% increase on the 2013 one. Assumptions on static or low growth are curious with the recent and current residential building work underway and the growth areas identified in the South Wairarapa District Councils long term plan. Traffic can be expected to grow accordingly – as will the number of cyclists and pedestrians.

**Stone Wall.** The mitigation proposed in retaining the stone wall is a nonsense. The wall is constructed of capped concrete posts and with concrete block plastered to give the appearance of stone between. The wall is in poor condition with portions missing, missing and chipped capping's, chipped pillars, a general lack of maintenance over a prolonged period. There is a gap in the wall at the north end for a pedestrian gate which would no longer have any context. The driveway is shown as 8.3m as it enters the property but is 9.8m as it crosses the footpath – that combined with a 2m wide proposed footpath, that is nearly 12m, 4x the size of the existing driveway and over half of the 20.48m frontage. Hacked about in this manner the wall will need some serious underpinning and will look ridiculous. In addition, we reiterate our concerns of the wall with regards to the visibility of the wall to drivers, particularly trucks due to its low height. Proposing to retain the wall is nothing short of madness. The wall would need to be rebuilt, which will require substantial foundations further endangering the copper beech.

**Driveway.** Comparing the existing driveway to that which is proposed is also a nonsense. The existing driveway is residential and lightweight in nature, compared to the at least 300mm excavation local roading contractors advise would be required for heavy vehicles and the 40% of supermarket traffic to use on a regular basis. This can be clearly seen by overlaying the Riley drawing on the last page of the Planning Evidence over an aerial photograph with both at the same scale where the topographical survey shows the tree at about 10m spread rather than the 17m spread noted in the All Seasons Tree Services arborist report and is evident from the aerial photograph. The red part circle (15m radius) is the Tree Protection Zone noted in the Peers Brown Millar report. Much of the critical root mass is beneath the proposed driveway which is ignored in the Arboriculture evidence. By not considering the design at this point it seems inevitable that the tree will not survive considering how much of the ground will be covered by pavement. **GIVE OUR DIAGRAM TO COMMISSIONER**

The comparison with the driveway between Greyfriars Motel and Realestate/Alluminium also shows a lack of understanding of Greytown. This was the site the Bottom Pub (our forebears didn't have a



lot of imagination with either street names or pubs – we had a Top, Middle and Bottom pub) and this development reflects that earlier site. Greyfriars is near the southern end of the Historic Heritage Precinct and has a different use to the entirely mixed-use retail-residential properties to the North. The Greytown west side retail area continues to the Greyfriars driveway.

**Sign** We note that the pylon sign continues to be shown over a short existing piped section of the water race. As an aside, the 1890's the water race should be considered a significant natural feature given how long it has been there. None of the material provided by the experts shows how this sign/water-race clash would be resolved and how this works with the size of the footing which will be required as noted in our submission. We reiterate the comments made in our submission about the sign – that

- The proposed new sign is **83%** larger than the 2sqm in area allowable for a site;
- The location of the sign is free standing rather than above or suspended within a buildings verandah;
- The sign as a freestanding sign is **over 7 times larger** than the 0.5sqm allowable (or nearly **13x larger** when the frame of the sign is included)
- The supermarket already has a freestanding sign far larger than the district plan standards.
- The supermarket already has an illuminated sign far greater 2m<sup>2</sup> allowable. That sign alone (excluding the base) is nearly **five** times the allowable size.

The GHT produced a well-regarded Style Guide in 2021 to provide advice on what is appropriate given the difficulty of navigating the District Plan. The proposal and the sign do not follow this guidance – or the design guidelines within the District Plan which our Style Guide was based on.

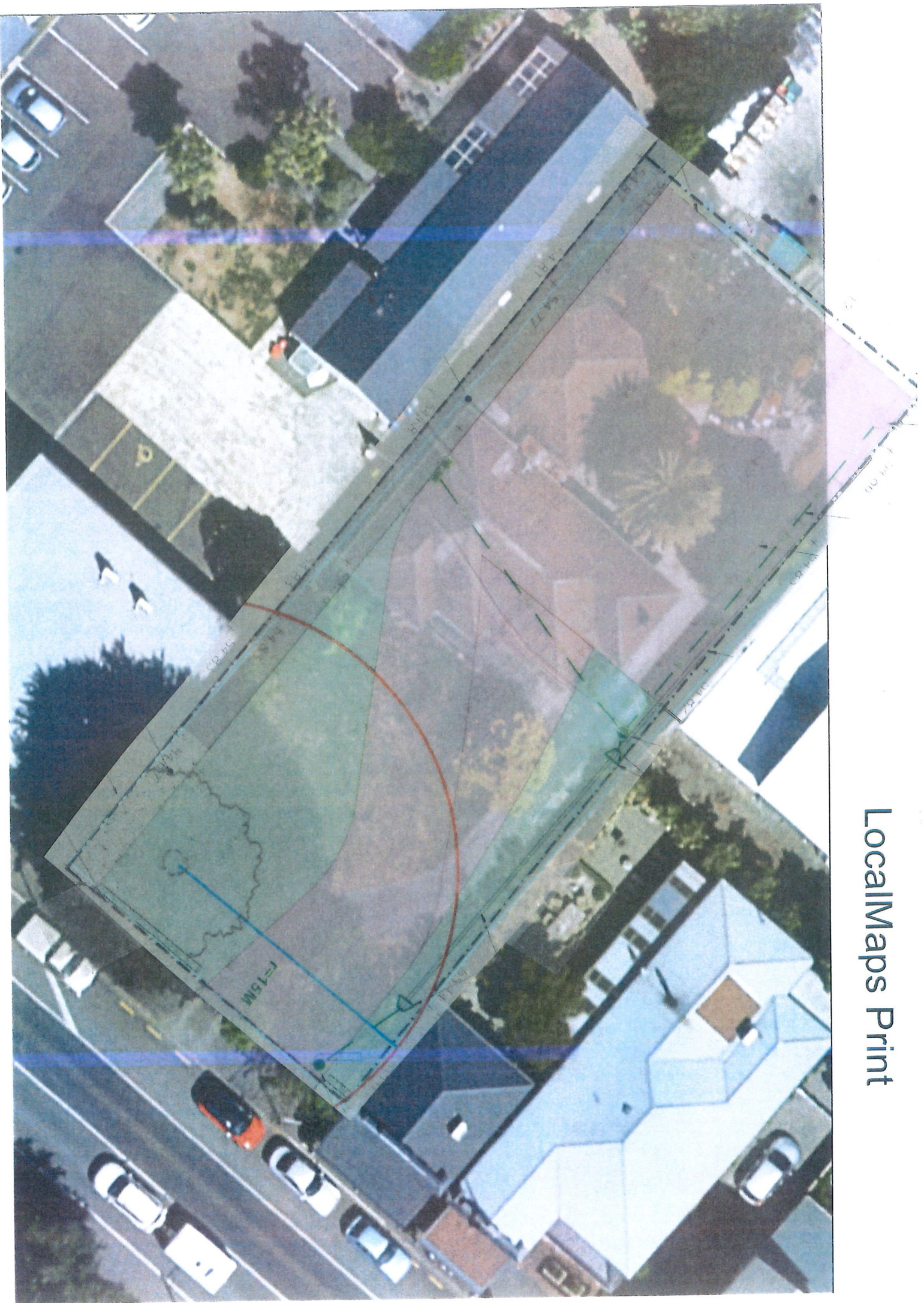
**Acoustic Treatment.** We note that there has been no acoustic evidence provided to support the proposed acoustic mitigations. This is surprising given that this is a very specialised field.

**Landscaping.** The comments that the *“larger areas of planting will “maintain the existing planted character of the previous yard”* are simply not correct – how can a what is effectively a driveway the size of a road with the landscaping proposed maintain the character of the exiting front yard of a residence at 134 Main Street maintain the character.

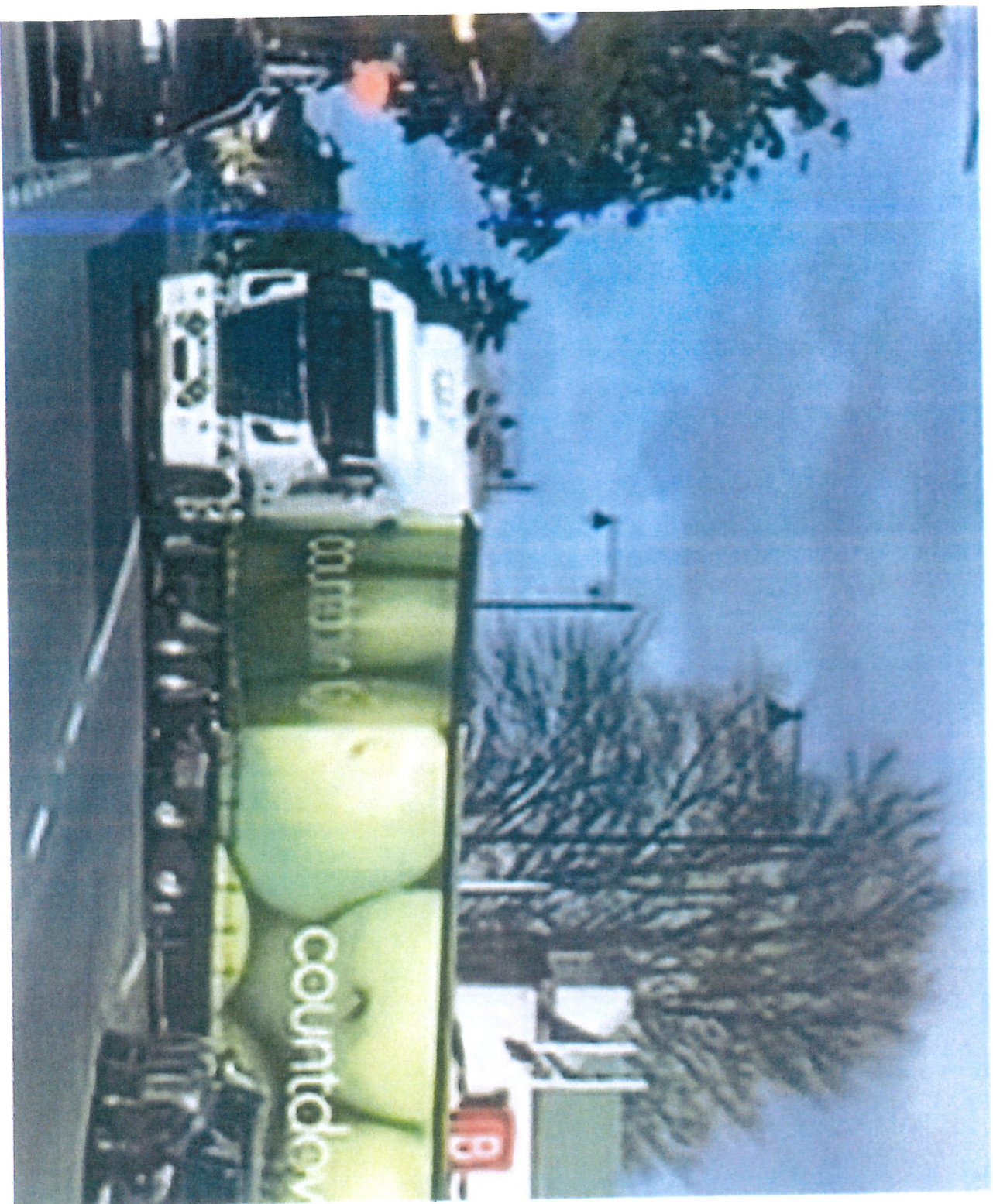
**Heritage values.** The heritage values of the site are part of the intrinsic values of Greytown which led to the creation of the Historic Precinct and the subsequent Residential extensions at either end – which were driven by locals when they saw some of the development which was happening (and was the first plan change to the current District Plan). The applicant has failed to address the wider context of the Historic Precinct and rather sees the site in isolation as perhaps an industrial area of Hamilton or Palmerston North





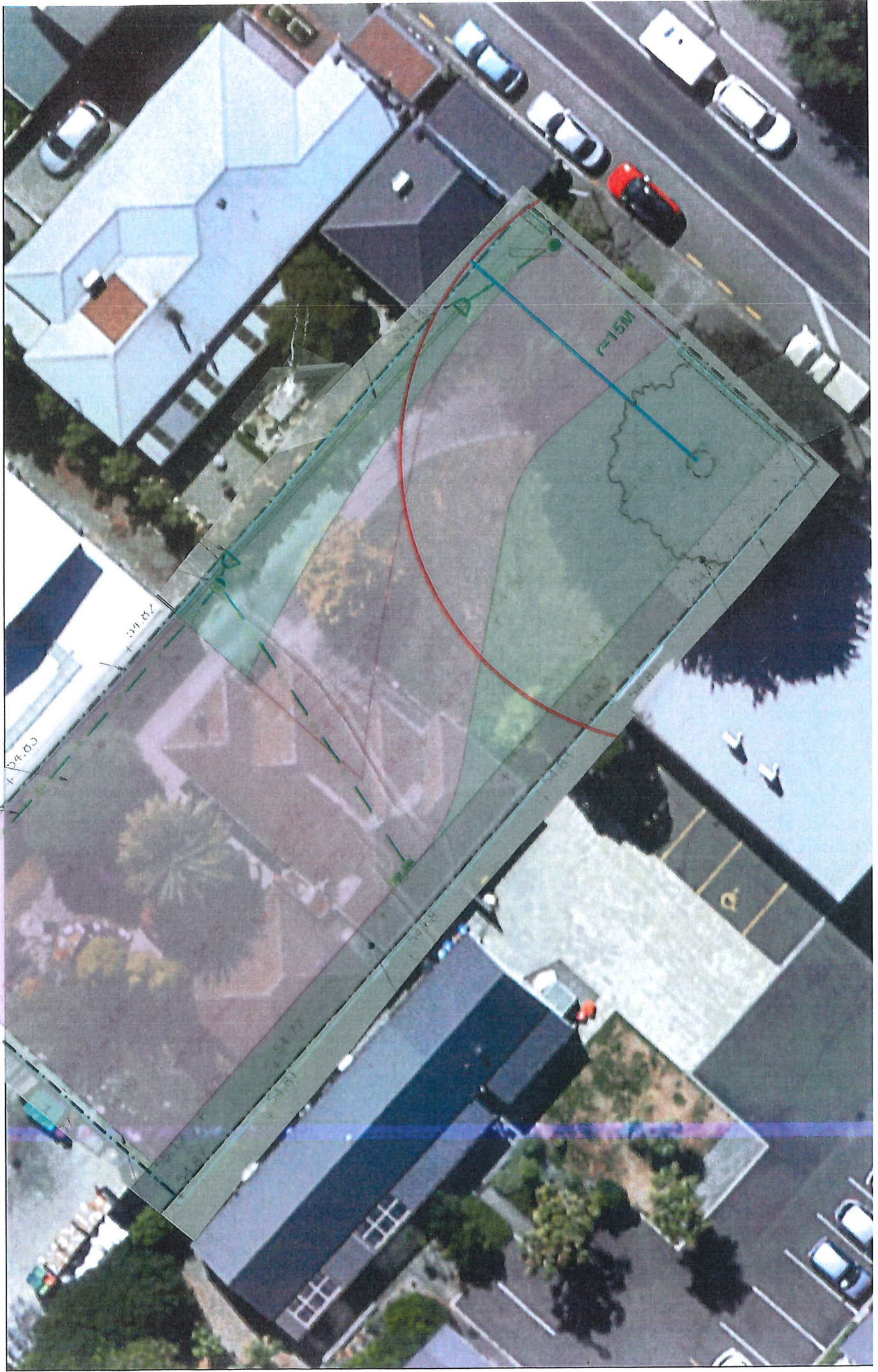






September 2023 photo







88  
Commenting on the complaint Mr Peers  
comments about the raising of  
the flags - this has been done  
on other local news, ~~which~~  
which led to them ~~being~~  
becoming too heavy & blowing  
over as we recently did in  
Market Road



## Appendix 10

### Bullet Points Richie Hill: Expert Witness to Hearing, Woolworths NZ / Fresh Choice development October 2023

- There are two trees of significance on site: Copper Beech (*Fagus sylvatica purpurea*) and Horoeka (*Pseudopanax crassifolius*) “lancewood”
- Both trees are high value assets on the town landscape
- The Copper Beech is aesthetically prominent, reflective of settler habitation and plantings
- The Horoeka of considerable maturity and worth in the Greytown townscape for being native in a context that often defaults to exotic plantings
- The environment in the Wairarapa is likely to mean that the Copper Beech is near the edge of climate tolerance for the species
- Any modification to rooting area is likely to have direct implications for tree health. As Beech does not reiterate, this is likely to be terminal. It’s crisis may not be immediately noted but the town may be left with a dead tree standing.
- Richard Peers, of Peers Brown Miller in Auckland, in his report for Woolworths NZ notes the presence of a watercourse which the developers intend to remove. This is highly pertinent because Beeches are drought sensitive – the water course has possibly been a player in the sustained health of the tree
- Horoeka slow growing so stature of this particular tree reflects an extensive history. It adds to the eco and biodiversity of the area
- Horoeka adds height and structure to townscape. The species is of cultural importance to Māori
- Trees reduce energy usage, remove air pollutants, sequester carbon, filter stormwater, and significantly cool environments.
- Maintaining and planting trees in urban environments is a recognised aide in the ongoing address to climate change
- Both these trees deserve overt management; the iterative loss of mature trees, clandestinely, one at a time, is a calamity for our ecology and our climate
- The current planning application needs a robust protection methodology or mitigation strategy
- Finally it is worth noting that two trees are spoken of here, the Copper Beech and the Horoeka. They are noteworthy landmarks on the western side of the Main Street where there are fewer mature trees. They fall to discussion here when, in the UK, there is considerable grief and fury about last month’s rogue felling of the single Sycamore tree at Hadrian’s Wall’s Sycamore Tree Gap. **Trees are totemic in communities.** Beyond history, ecology, biology, or climate, trees have a **resonant affective life** amongst the generations of people that encounter them. Or perhaps don’t, if we have lost them.

**Before the Independent Hearing Commissioner  
at Wairarapa**

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Under	the Resource Management Act 1991 (the <b>RMA</b> )
In the matter of	an application for resource consent by Woolworths New Zealand Ltd to undertake demolition of a building, undertake new building, alterations, and additions and to establish a sign exceeding the maximum size within the Greytown Historic Heritage Precinct; establish an additional vehicle crossing to State Highway 2 (Main Street) Greytown and to undertake associated landscaping and site works.
Between	<b>Woolworths New Zealand Limited</b> Applicant
And	<b>South Wairarapa District Council</b> Consent Authority

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**Summary Statement of Terry Phillip Church on behalf of  
Waka Kotahi New Zealand Transport Agency  
Traffic**

Dated 2 October 2023

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## **Terry Church Summary Statement – delivered at Hearing 2 October 2023**

### **Transport Engineer for Waka Kotahi NZ Transport Agency**

I would like to correct one paragraph of my evidence please, being paragraph 9.36. In the first sentence, I note that *“the RTS6 guideline strongly discourages high volume driveways on high volume rural arterial roads”*. Could I please correct that to read *“the RTS6 guideline states that high volume driveways on arterial roads should be banned or strongly discouraged”*.

I will take paragraphs 1.1 to 1.3 as read.

### **In paragraph 1.4 to 1.7 I speak to the function and volumes experienced fronting the proposed access.**

Main Street/SH2 is a Strategic Arterial as defined by the District Plan and a Regional Route as defined by Waka Kotahi's One Network Road Classification (**ONRC**). Regional roads carry 10,000 vehicles or more per day and have a high percentage of heavy vehicles, as is the case for Main Street fronting the proposed vehicle access.

Main Street experiences high seasonal demands during the period where the temperature is warmer and the days are longer. Between October 2022 and April 2023, 3 out of 5 weekdays experience volumes greater than 10,000vpd. I anticipate pedestrian volumes during this period are also higher.

**At paragraph 1.8 and 1.9 I run through the transportation matters with the proposal.** I consider the effects of the application on the transport environment to be more than minor, with the access introducing significant safety and operating effects to all users of the network, including pedestrians, cyclists, turning traffic and through traffic on SH2.

### **Some key effects that I would like to highlight with the Commissioners include:**

**Conflicts.** Mr Hills view is that the conflicts introduced by the new access are simply shifted from other parts of the network, as the demand of the supermarket is not expected to change. I disagree with this view.

- Mr Hills only focuses on vehicles when making this comparison and does not reflect that the driving environment about an intersection is very different to that of a poorly sited driveway.
- At the Hastwell Street intersection, as with any intersection without pedestrian facilities, vehicles have priority, with pedestrians giving way. This allows vehicles to clear the intersection, with pedestrians crossing when it is safe to do so. As such, pedestrian conflicts are minimised.
- The new access however places pedestrians, including vulnerable footpath users such as elderly and children in the firing line of vehicles. This conflict is new and is significant in that it relies on motorists observing the road rules to allow pedestrians to cross safely within an environment where the focus should be on people, not vehicles.

**Safety.** The proposed access introduces an unacceptable safety risk to all road users, especially vulnerable footpath users including children and elderly. An access in this location does not achieve the standard of the District Plan.

- **Appendix 5 of the District Plan** points to **NZS 4404:2004 Land Development and Subdivision Guideline**. Note that NZS4404:2004 has been updated to NZS 4404:2010.
- **NZS4404:2004** states that vehicle crossings **“shall be design in accordance with the NZTA Pedestrian planning and design guide”** Note that NZS4404:2010 text remains consistent.

- The **NZTA Planning and pedestrian design guide standards, at 14.11 Driveways** sets out the considerations of the design, stating that:
  - Driveways should be located where the expected pedestrian activity is low. Pedestrian users are high, particularly during weekends as surveyed by Mr Hills
  - Turning radii should be minimised to ensure slow vehicle speeds. The access is 8.3m wide to cater for trucks, and therefore presents a very large radius
  - The driveway width should be minimised to slow vehicles, again the width is 8.3m. While the applicant suggests this width presents as mitigation relative to an earlier application, I disagree, noting that the current driveway width reflects that of a residential driveway, being some 3m.
  - The give-way obligations of drivers and pedestrians should be clear. I do not consider an 8.3m high volume access that serves a supermarket to provide clear give-way obligations to drivers.
  - The pedestrian path is continuous in grade, crossfall, colour and texture across the driveway.

**Increases exposure and likelihood of vehicle crashes.** As highlighted in my evidence and my Safe System Assessment, the likelihood of crashes caused by vehicles swerving to avoid turning vehicles is **Highly Likely**. I do not consider it relevant to base the risk of swerving crashes at other driveways in Greytown as there are no high volume driveways in Greytown that would cater for more than 500 vehicles per day. Connections with the state highway catering for this demand are all intersections. As set out in my evidence (paragraph 9.57) nose to tail crashes have been reported at low volume accesses where exposure and likelihood is much lower than that predicted for the proposed access.

**Poor visibility and a poorly sited access.** The RTS 6 Guideline for Visibility at Driveways states several key matters which should be addressed when considering a driveway onto an arterial, or at least be mitigated in some way. Specifically, the guideline states

- Dominant function of arterial roads is to carry through traffic
- Drivers on these roads are therefore unlikely to expect many driveway manoeuvre type conflicts
- Right turn movements into a driveway will disrupt through traffic. They are also the most common movement in accidents at driveways
- High volume driveways on arterial roads should therefore be banned or strongly discouraged.

What the guideline is suggesting Sir, is that a high volume driveway should really be designed as an intersection, to ensure conflicts are minimised. The intersection of Hastwell Street serves this purpose in providing a safe access point to the supermarket.

**At paragraph 1.10** I suggest that on-site effects associated with **loading and servicing** can be appropriately managed on-site through a travel management plan and reconfiguration of the Site. My evidence sets out other supermarkets about the region having similar layouts and loading requirements. I note that the Freshchoice in Cromwell, constructed in 2018 provides a similar layout to the Greytown Freshchoice, suggesting the layout remains relevant.

A pedestrian connection to Main Street is supported provided the design is improved to provide a safer route (between West Street and Main Street) for those using the proposed connection.

**At paragraph 1.11** I discuss how I have considered alternatives both on-site and for the access. I am of the view that my suggested alternatives (on-site and a loading egress only) mitigate the health and safety suggested to occur on site while also managing the effects on the transport/state highway environment. I do not consider there is a need for a further access for the supermarket, with Hastwell Street providing a safe and efficient intersection that caters for customers driving to the

supermarket. I do not consider the applicant's 8.3m access as mitigation and am of the view that no mitigation has been proposed by the applicant to address the effects the access introduces.

## Appendix 12

### **Before the Independent Hearing Commissioner at Wairarapa**

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Under the Resource Management Act 1991 (the **RMA**)

In the matter of an application for resource consent by Woolworths New Zealand Ltd to undertake demolition of a building, undertake new building, alterations, and additions and to establish a sign exceeding the maximum size within the Greytown Historic Heritage Precinct; establish an additional vehicle crossing to State Highway 2 (Main Street) Greytown and to undertake associated landscaping and site works.

Between **Woolworths New Zealand Limited**  
Applicant

And **South Wairarapa District Council**  
Consent Authority

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**Response to rebuttal evidence – Kathryn St Amand on  
behalf of Waka Kotahi New Zealand Transport Agency**

Dated 2 October 2023

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## **Planning Matters**

Having read the legal submission and rebuttal evidence for the Applicant I make the following observations.

*Definition of site and application of access standards:*

I continue to hold my opinion on the application of site access standards across all the land parcels that the FreshChoice supermarket occupies as comprising one site. I disagree the site over which consent is sought is a different or separate site.

The definition in the District Plan is plain on this matter and my interpretation of that definition has not been challenged.

*Site Access Standards – Appendix 5 Requirements for Roads, Access, Parking and Loading*

I have taken further advice from Mr Church on these standards and considered further the matters requiring resource consent in Appendix C of my primary evidence. I consider these matters are still accurate with the addition that the proposed access also does not meet with the required standards of NZS 4404: 2004 Land Development and Subdivision Engineering. These standards guide and control access width and location.

*Signage*

Whilst I have made a planning assessment regarding the proposed signage and its effect on the streetscape environment; I note Waka Kotahi has opposed the sign on the grounds that the access should be refused in which case the sign would be out of context in the location proposed<sup>1</sup>

I consider a mitigation to that could be sign content and wayfinding assistance so potential customers know to turn as Hastwell Street to enter the supermarket by vehicle.

## **Permitted Baseline**

I maintain that there are no components of the proposal to which a permitted baseline of effects could apply, removal of the Copper Beech tree aside, which has a Certificate of Compliance but the tree is also required as a mitigation to the proposal.

## **Planning and legal framework**

I consider the objectives and policies of the WCDP provide a comprehensive framework for assessing this proposal and it would be appropriate to give this framework weight in determining the proposal.

Having probed the District Plan I find the planning framework it establishes gives weight to heritage and amenity matters including an 'avoid' policy under 6.3.17 Com Policy (c); and

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<sup>1</sup> Waka Kotahi submission para 11.(xxv)

because in all areas of the District Plan (commercial zone and district wide provisions including the assessment criteria under 22.1.16 for the access) there are references to ensure that amenity values and character and heritage are specifically considered.

Assessment criteria 22.1.16 (ix) requires consideration of:

*Whether the access, parking or loading would have an adverse effect on the special character or amenities of the site.*

The conclusion of Mr Church is that the traffic effects are more than minor. The conclusions of Mr Bowman is that the effects on heritage are more than minor. Both are significant resource management issues and, because of these assessments it would be appropriate for the Applicant when assessing the effects of the proposal to consider alternatives in accordance with the Fourth Schedule<sup>2</sup> of the Resource Management Act 1991 (RMA). The applicant has not offered any such assessment.

Considering the assessment and evidence of Mr Knott, I find there is some balancing of onsite health and safety fixes when considering the design and layout of the proposal within the HPP context. I prefer the evidence of Mr Bowman which takes a direct inquiry on the heritage issue. Mr Bowman describes the effect of the wide driveway as being 'vacant' space, I consider that vacant space cannot be mitigated by landscape planting either side of it and will give the proposed buildings prominence despite their setback.

As Heritage is a matter of national importance, and well established in the planning framework of the WCDP, because Mr Church can identify alternative ways to adequately provide for safe delivery vehicles access, and as customers already have two other access points to the supermarket, when considered altogether as well as being inconsistent with the district plan framework the proposal is inconsistent with Part 2 of the RMA and there are alternative ways to achieve the outcomes sought by the Applicant without the effects generated by this proposal.

Correction to evidence:

Paragraph 8.19, reference to there being no other thoroughfares between the blocks of Main Street to West Street; there is at least one existing beside 72 Main Street, however that is narrow (approx. 3m in width) and low key / not associated with high traffic volumes.

Response to issues raised at hearing:

- The ONF, which is another matter under s104(1)(c) that can be considered (listed in appendix A to my evidence in chief), although not part of district plan, the intent of the ONF aligns well with the transport section and commercial zone policies of the district plan.
- The landscape plan mitigation offered by the applicant is still unclear, particularly how it will be implemented considering CPTED, the open water course on site and any limitations that poses, and potential for height of planting considering onsite constraints.
- Planning assessment on heritage matters, see my evidence in chief at paragraph 8.15 and the interrelated nature of assessing all planning matters related to onsite development because of the proposed width of the proposed driveway access and street function.

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<sup>2</sup> RMA Fourth Schedule 6(1)(a)



