

16 February 2026

Hearings Panel
Proposed Kaipara District Plan
Kaipara District Council
Private Bag 1001
Dargaville 0340
Via email: mwalters@kaipara.govt.nz

Tēnā koutou Commissioners,

Re: Proposed Kaipara District Plan – Hearing 8 – Signs

Introduction

Foodstuffs North Island Limited (**Foodstuffs**) is made up of several independent co-operatives, with all employees and retail members supportive of the organisation's commitment to provide New Zealanders with the best possible service and quality products. The Foodstuffs North Island co-operative employs more than 1700 people who support the 102 New World, 43 PAK'n'Save and 167 Four Square owner-operated retail supermarkets throughout the North Island. Of these, Foodstuffs currently has five established supermarkets in the Kaipara District.

Signs Chapter

In accordance with submission point S247.35, Foodstuffs continue to seek amendments to Rule SIGN-R4 so that signs located on, or attached to, buildings or windows are exempt from the 'sign size' and 'number of signs' standards (SIGN-S2 and SIGN-S4). Foodstuffs also seek the introduction of a separate rule to address signs located on structures, fences and walls.

The Reporting Officer acknowledges Foodstuffs perspective but considers it unclear how creating a separate rule for signage attached to structures, walls and fences will make a difference. They also note that Foodstuffs has not provided practical examples or evidence demonstrating where the notified rule framework may create issues.

In response to this, Foodstuffs wish to highlight the following practical examples to demonstrate how this rule is presently restrictive within a supermarket context:

- **New World, Mangawhai – 83 Molesworth Drive, Mangawhai – Special Purpose (Estuary Estates – Mangawhai Central Zone):** There don't appear to be sign size requirements for permanent signs in 'all zones' which indicates that permanent signs on this supermarket building's façade and windows would trigger resource consent as a Restricted Discretionary Activity. The maximum number of signs enabled for this site is two permanent signs. As can be observed in **Figure 1** below, this existing supermarket

already has numerous signs on its building façade meaning that Foodstuffs would need to apply for resource consent as a restricted discretionary activity for any additional signage proposed in the future;



Figure 1: New World, Mangawhai

- **Four Square, Ruawai – 15 Freyberg Road, Ruawai – Commercial Zone:** The maximum total sign area must not exceed 6m² where there is less than 24m road frontage width (approx. 15m in total). The maximum number of signs enabled for this site is two permanent signs (site only has one road frontage) and two temporary signs. As can be observed in **Figure 2** below, this existing supermarket already contains more than two permanent and/or temporary signs on its building façade / windows meaning that Foodstuffs would need to apply for resource consent as a restricted discretionary activity for any additional signage proposed in the future;



Figure 2: Four Square, Ruawai

- **Four Square, Mangawhai - 3 Wood Street, Mangawhai – Commercial Zone:** The maximum total sign area must not exceed 6m² where there is less than 24m road frontage width (approx. 23.6m in total). The maximum number of signs enabled for this site is two permanent signs (site only has one road frontage) and two temporary signs. As can be observed in **Figure 3** below, this existing supermarket already contains numerous signs on its building façade / windows meaning that Foodstuffs would need to apply for resource consent as a restricted discretionary activity for any additional signage proposed in the future; and



Figure 3: Four Square, Mangawhai

- **Four Square, Kaiwaka – 1 Kaiwaka Mangawhai Road, Kaiwaka – Commercial Zone:** The maximum total sign area must not exceed 12m² where there is more than 24m road frontage width (approx. 79.2m in total). The maximum number of signs enabled for this site is four permanent signs (site only has two road frontages) and two temporary signs. As can be observed in **Figures 4 & 5** below, this existing supermarket already contains numerous signs on its building façade / windows meaning that Foodstuffs would need to apply for resource consent as a restricted discretionary activity for any additional signage proposed in the future.



Figure 4: Four Square, Kaiwaka – Kaiwaka Mangawhai Road Elevation



Figure 5: Four Square, Kaiwaka - Gibbons Road Elevation

The practical examples above demonstrate that the notified Rule SIGN-R4, requiring all signs located on, or attached to, buildings or windows to comply with Standards SIGN-S2 and SIGN-S4, is unnecessarily restrictive for both existing and future supermarkets, and other stores. In practice, this rule would result in the requirement of resource consent applications for routine signage changes on existing supermarket buildings, even where the signage is modest in scale, flush-mounted, and consistent with established commercial character.

Foodstuffs consider that the requirement imposes an undue regulatory burden with little corresponding benefit. It is unclear what specific adverse effects the Council intends to manage through this approach,

particularly given that the majority of these supermarkets are located within the Commercial Zone where building-mounted and window-mounted signage is an inherent and anticipated component of the built environment. Shoppers and the wider public reasonably expect supermarkets to display operational, directional, and brand-related signage on their facades and windows, and it is not considered that such signage typically poses effects on amenity or character beyond what is already accepted in this zone.

For these reasons, Foodstuffs maintain that the notified rule framework is disproportionate to the scale and nature of effects generated by this type of signage and that it should be amended as follows to avoid unnecessary resource consent requirements:

“SIGN-R4

Signs on or attached to a building ~~or structure~~, window, ~~fence or wall~~

1. *Activity status: Permitted*

Where:

- a. The sign does not protrude above the highest point of the building or structure;*
- b. The sign relates to goods and services available on the site; and*
- c. The sign complies with:*
 - i. SIGN-S1 Traffic safety for signs;*
 - ii. ~~SIGN-S2 Sign Size; and~~*
 - iii. ~~SIGN-S4 Number of signs.”~~*

“SIGN-RX

Signs on or attached to a structure, fence or wall

1. *Activity status: Permitted*

Where:

- a. The sign does not protrude above the highest point of the building or structure;*
- b. The sign relates to goods and services available on the site; and*
- c. The sign complies with:*
 - i. SIGN-S1 Traffic Safety for signs;*
 - ii. SIGN-S2 Sign Size; and*
 - iii. SIGN-S4 Number of signs.”*

Summary

I can confirm that Foodstuffs will not be filing evidence for Hearing 8 at this stage and does not wish to be heard at the hearing. However, I am available to answer any questions from the Hearing Panel either in writing or via videoconference if required.

Yours sincerely | Nāku noa, nā

Barker & Associates Limited



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