

# Foodstuffs Submission on PDP



**Full Name:** Foodstuffs North Island Limited

**Address for Service:** Barker & Associates, Attention: David Badham, [davidb@barker.co.nz](mailto:davidb@barker.co.nz)

**Date:** 30 June 2025

**Re:** Submission on Proposed Kaipara District Plan (**PDP**) – Foodstuffs North Island Limited

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## **Submission Information:**

Foodstuffs North Island Limited could not gain an advantage in trade competition through this submission.

The specific provisions of the Plan Changes that Foodstuffs North Island Limited submission relates to are attached.

Foodstuffs North Island Limited seeks amendment to the specific provisions as listed in the attached document. The reasons are provided in the attached document.

The decisions that Foodstuffs North Island Limited wishes Kaipara District Council (**KDC**) to make to ensure the issues raised by Foodstuffs North Island Limited are dealt with are also contained in the attached document.

Foodstuffs North Island Limited wishes to be heard in support of this submission.

If others make a similar submission, Foodstuffs North Island Limited will consider presenting a joint case with them at a Hearing.

**Andrew Bell**

**Foodstuffs North Island Limited**

## 1.0 Introduction

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### 1.1 About Foodstuffs

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Foodstuffs North Island Limited (**Foodstuffs**) welcomes the opportunity to submit on the Kaipara District Council (**KDC**), Proposed District Plan (**PDP**), as released on 28 April 2025.

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 (**NW**), 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 – these are outlined in **Attachment 1**.

In Foodstuffs' experience, regional and district planning frameworks often do not properly recognise the need for business growth to occur, including alongside residential growth. Given Foodstuffs' significant past and planned further investment in New Zealand, the contents of any future District Plan provisions will be integral to continuing operation and development of Foodstuffs in the Kaipara District.

This submission covers matters addressed by the PDP which Foodstuffs has an interest in. Specific points of submission are detailed in **Attachment 2**, whilst general feedback is detailed in Section 2.0 below.

## 2.0 General Feedback

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Foodstuffs acknowledge and appreciate the work that KDC have put into developing the PDP. However, Foodstuffs has general concern that the Strategic Direction chapter contains objectives for each topic, and not policies. In Foodstuffs' view, the objectives need policies to demonstrate how they are going to be achieved in the Plan. It is also important at this strategic level of the PDP, that the policies provide clear direction for the consideration of resource consents where there is conflict between different areas of strategic direction.

The complete lack of policy direction and rule framework surrounding supermarket activities within the proposed zones is opposed. Foodstuffs is concerned that supermarkets are not enabled as a permitted activity anywhere in the Kaipara District. In addition, Foodstuffs considers that a number of the proposed provisions relating to urban design requirements and parking and access requirements impose unnecessarily restrictive controls on supermarket activities.

Foodstuffs is also concerned that a number of the proposed provisions fail to recognise the operational requirements of supermarkets, the benefits they provide to the wider community, and may unnecessarily restrict future plans to develop new or existing facilities over the ten-year lifespan of the District Plan.

Foodstuffs has identified a number of their sites of interest within **Attachment 1**. This also outlines the zones and overlays that apply to each site of interest to Foodstuffs.

Foodstuffs has made a number of specific submission points as outlined within **Attachment 2** to improve the PDP and to efficiently and effectively achieve the proposed objectives of the plan change package, and the purpose of the RMA.

## 3.0 Conclusion

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In conclusion, Foodstuffs seeks the following relief:

- (a) Foodstuffs' general feedback in Section 2.0 and specific feedback in **Attachment 2** is addressed and necessary changes incorporated into the PDP.
- (b) Any further necessary consequential amendments required to achieve (a) above.

Foodstuffs looks forward to working collaboratively with KDC to address the above relief and is happy to meet with KDC policy staff or consultants to work through these matters.

## Attachment 1: Foodstuffs Sites of Interest in the Kaipara District

Address	Operative District Plan (ODP)	Proposed District Plan (PDP)
83 Molesworth Drive, Mangawhai	<b>Zone:</b> Estuary Estates <b>Overlays:</b> Harbour Overlay	<b>Zone:</b> Special Purpose (Estuary Estates – Mangawhai Central) <b>Overlays:</b> Coastal Environment <b>Controls:</b> Mangawhai/Hakaru Managed Growth Area
15 Freyberg Road, Ruawai	<b>Zone:</b> Business Commercial <b>Overlays:</b> N/A	<b>Zone:</b> Commercial <b>Overlays:</b> State Highway or Rail Corridor Noise Control Boundary, Coastal Flood Hazard Zone 2 (100 years), River Flood Hazard Zone 2 (1 in 50 year flood), River Flood Hazard Zone 3 (1 in 100 year flood)
163 Hurndall Street East, West, Maungaturoto	<b>Zone:</b> Business Commercial <b>Overlays:</b> N/A	<b>Zone:</b> Commercial <b>Overlays:</b> State Highway or Rail Corridor Noise Control Boundary, River Flood Hazard Zone 3 (1 in 100 year flood)
3 Wood Street, Mangawhai Heads, Mangawhai	<b>Zone:</b> Business Commercial <b>Overlays:</b> Harbour Overlay	<b>Zone:</b> Commercial <b>Overlays:</b> N/A <b>Controls:</b> Mangawhai / Hakaru Managed Growth Area
1 Kaiwaka-Mangawhai Road, Kaiwaka	<b>Zone:</b> Business Commercial & Residential <b>Overlays:</b> N/A	<b>Zone:</b> Commercial <b>Overlays:</b> N/A

# Foodstuffs Submission on PDP

## Attachment 2: Foodstuffs Specific Submission Points on the PDP

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
ENTIRE PLAN				
1	Entire Plan	Seek Amendment	<p>In terms of the notified zones and provisions, Foodstuffs highlight that the PDP provides a single Commercial Zone (COMZ). Foodstuffs are unable to understand why Council has chosen to only use one commercial zone being the COMZ. The National Planning Standards provide a range of commercial zones, which could be utilised:</p> <ul style="list-style-type: none"> <li>• Neighbourhood Centre Zone</li> <li>• Local Centre Zone</li> <li>• Town Centre Zone</li> <li>• Large Format Retail Zone</li> </ul> <p>Foodstuffs consider that the s32 evaluation has failed to undertake a complete analysis of the efficiency and effectiveness of the zone proposed, and does not consider the most appropriate zoning options commercial land across the Kaipara District, but particularly in key urban areas of Dargaville, Mangawhai, Kaiwaka and Maungaturoto.</p>	Establish a centre hierarchy to set a clear policy direction for the larger urban areas (e.g., Dargaville, Mangawhai, Kaiwaka and Maungaturoto) within the District, and amend provisions and zoning as necessary to implement the hierarchy that achieves a sustainable and well-functioning urban form.

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			As such, Foodstuffs considers that the PDP does not include any form of direction by way of mapping or provisions to set a clear hierarchy of centres. There is no identification of small, medium or large centres. Foodstuffs consider this lack of strategic direction and centres hierarchy to be a significant flaw in the PDP that will hinder the ability to achieve a sustainable and well-functioning urban form in accordance with the relevant requirements of the National Policy Statement for Urban Development.	
PART 1 – INTRODUCTION AND GENERAL PROVISIONS – INTERPRETATION - DEFINITIONS				
2	Definitions	Support	Foodstuffs support the use of nesting tables	Retain nesting tables as notified, notwithstanding change requested below.
3	Definitions – new for “Supermarket”	Seek amendment	<p>As currently drafted, a supermarket would be considered a ‘commercial activity’ (defined term), and further classified as a ‘supermarket’ within the parking and trip generation standards. Supermarket is not a defined term within the PDP.</p> <p>In addition, the term supermarket is used inconsistently throughout the proposed provisions, which could lead to confusion and inconsistent application.</p>	<p>Amend the definitions chapter to insert the following definition of supermarket (or to similar effect):</p> <p><b><u>Supermarket means a self-service retail activity selling mainly food, beverages and small household goods.</u></b></p> <p>And ensure that this definitions is appropriately captured in the nesting tables (e.g., Commercial Activities Group)</p>
STRATEGIC DIRECTION				

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4	Strategic Direction	Seek amendment	The Strategic Direction chapters do not contain policies (other than Urban Form and Development chapter) which give effect to the proposed objectives. Foodstuffs consider that there is no clear policy direction to give effect to the proposed objectives which could lead to an ineffective plan.	<p>That the Strategic Direction Chapter:</p> <ul style="list-style-type: none"> <li>• Be reconsidered to provide clear direction for commercial growth and development throughout the Kaipara District.</li> <li>• Insert appropriate policies into the Strategic Direction chapters to give effect to Strategic Direction objectives.</li> <li>• That KDP establish a centre hierarchy to set a clear policy direction for the larger urban areas within the District, and amend zoning as necessary to implement the hierarchy.</li> <li>• That proposed Strategic Direction objectives and policies be evaluated in accordance with section 32AA to confirm that these are the <u>most appropriate</u> objectives.</li> </ul>
5	Strategic Direction – Vision for Kaipara – Objective SDVK-O1 and O2	Support	Foodstuffs support these objectives which seek to provide for wellbeing and economic growth and development.	Retain SD-VK-O1 and SD-VK-O2 as notified.
6	Strategic Direction – Vision for Kaipara – Objective SD-VK-O8	Support	Foodstuffs support this objective and the provision of affordable infrastructure.	Retain SD-VK-O8 as notified.
7	Strategic Direction – Urban Form and Development – Objective SD-UFD-O2	Support	Four of Foodstuffs' existing stores (with the exception of Mangawhai Central) are located (within the Kaipara District are located within the Commercial Zone or a Special Purpose Zone. Foodstuffs therefore support that	Retain Objective SD-UFD-O2 as notified.

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			economic and business development opportunities are enabled within Commercial and Industrial Zones, and in other zones where the activity is compatible.	
8	Strategic Direction – Urban Form and Development – Policy SD-UFD-P1	Support	Foodstuffs support the business land capacity is provided within or adjacent to existing urban areas as it gives effect to the National Policy Statement on Urban Development 2020 (NPS-UD).	Retain Policy SD-UFD-P1 as notified.
9	Strategic Direction – Urban Form and Development – Policy SD-UFD-P4	Support, seek amendment	Foodstuffs support this policy in that it provides for mixed use development comprising predominantly commercial and community activities in a consolidated network of attractive commercial centres, however considers that changes will be needed in response to submission point #1 above	Retain Policy SD-UFD-P4 as notified.
10	Strategic Direction – Urban Form and Development – SD-UFD-P7	Oppose	Foodstuffs consider the Mangawhai/Hakaru Managed Growth Area is inappropriate because: <ul style="list-style-type: none"> <li>It represents an arbitrary spatial limitation on new subdivision and development within the area of the Kaipara District subject to the greatest population growth and demand.</li> <li>Provision of infrastructure and services can be provided to meet the</li> </ul>	Delete: <ul style="list-style-type: none"> <li>SD-UFD-P7;</li> <li>The Mangawhai/Hakaru Managed Growth Area spatial extent; and</li> <li>Any associated provisions within the PDP related to the Mangawhai/Hakaru Managed Growth Area.</li> </ul>



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			<p>requirements of urban areas without applying an arbitrary spatial limitation.</p> <ul style="list-style-type: none"> <li>This will unnecessarily restrict growth and improvement of economic and social wellbeing and will not achieve the RMA, national direction, regional direction or the strategic direction of the PDP.</li> </ul>	
<b>ENERGY, INFRASTRUCTURE AND TRANSPORT - TRANSPORT</b>				
11	Transport – Rule TRAN-R3	Support	Foodstuffs support the permitted activity status for land use and development in all zones, subject to meeting permitted standards.	Retain Rule TRAN-R3 as notified.
12	Transport – Rule TRAN-R4	Support	Foodstuffs support the permitted activity status for new or upgrades to existing vehicle accesses subject to meeting permitted activity status, and non-compliance with any of these resulting in a restricted discretionary activity status.	Retain Rule TRAN-R4 as notified.
13	Transport – Standard TRAN-S1	Oppose	Foodstuffs oppose the permitted threshold of 200 daily one-way movements per site for the Commercial, Light Industrial, and Heavy Industrial Zone as this is too restrictive for these types of activities. Foodstuffs also support the restricted discretionary activity status for non-compliance with this standard.	Increase the permitted threshold in TRAN-S1 for daily traffic movements for Commercial, Light Industrial and Heavy industrial zones / activities to 400 daily one-way movements, or another more suitable limit that adequately provides for the operational or functional needs of these activities, while maintaining a safe and efficient transport network.

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14	Transport – Standard TRAN-S4	Seek amendment	<p>While Foodstuffs support on-site carparking design standards, it is noted that the PDP has retained minimum carparking requirements. For supermarkets and shops the threshold is 1 car park per 25m<sup>2</sup>.</p> <p>Foodstuffs note that the NPS-UD requires Tier 1, 2 and 3 territorial authorities to remove provisions which require a minimum number of car parks. While KDC have elected to state they are not a Tier 3 urban environment, it is clear from previous decisions on plan changes from Independent Commissioners and the Environment Court, that Mangawhai is captured by this. Therefore, it is considered that these minimum standards should be removed from the PDP to ensure consistency with the NPS-UD.</p>	<p>Amend TRAN-S4 to remove reference to minimum carparking requirements as follows:</p> <p><b><i>“1. On-site carparking must comply with the following standards:</i></b></p> <p><del><b><i>a. All activities must provide the minimum car parks on-site as set out in TRAN Table 2;</i></b></del></p> <p><b><i>...”</i></b></p>
15	Transport – TRAN Table 1	Seek amendment	Foodstuffs seek for this table to be amended to remove reference to ‘Car Parking Spaces Required’ in the second column as this creates confusion and does not actually provide a permitted trip generation threshold.	Amend TRAN Table 1 to remove reference to ‘Car Parking Spaces Required’ in the second column.
16	Transport – TRAN Table 2	Seek amendment	The PDP has retained minimum carparking requirements. For supermarkets and shops, the threshold is 1 car park per 25m <sup>2</sup> .	Delete minimum TRAN-Table 2.

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			As outlined above, Foodstuffs note that the NPS-UD requires Tier 1, 2 and 3 territorial authorities to remove provisions which require a minimum number of car parks. Therefore, it is considered that these minimum standards should be removed from the PDP to ensure consistency with the NPS-UD.	
<b>HAZARDS AND RISKS – NATURAL HAZARDS</b>				
17	Natural Hazards – Policy NH-P6	Support	Foodstuffs support the requirement for new commercial buildings in River Flood Hazard Areas to have a minimum freeboard of at least 300mm above the 1 in 100-year flood event or be alternatively designed and constructed.	Retain Policy NH-P6 as notified.
18	Natural Hazards – Rule NH-R2	Support	The PDP seeks to manage the risk from natural hazards to people, property and infrastructure. Foodstuffs are supportive of the permitted activity rule for additions and alterations to existing buildings and a restricted discretionary activity status where there is non-compliance with this rule.	Retain NH-R2 as notified.
19	Natural Hazards – Rule NH-R3 and NH-R4	Seek amendment	Foodstuffs recognise that the PDP seeks to manage the risk from natural hazards to people, property and infrastructure. While Foodstuffs appreciate the importance of managing risk from natural hazards, it considers that new buildings should be recognised and provided for as a permitted	Delete rules NH-R3 and NH-R4 and replace with rules that provide a permitted activity pathway, with a restricted discretionary activity status where compliance cannot be achieved in NH-R4.

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			<p>activity with appropriate permitted standards, consistent with Rule NH-R8 which provides for new buildings in coastal erosion hazard areas or coastal flood hazard areas as a permitted activity. A permitted activity pathway could be provided, similar to what has been included in Plan Change 1, to the Whangārei District Plan.</p> <p>Foodstuffs consider that a discretionary activity status for non-compliance with NH-R4.1.a is onerous when the scope of potential effects are limited and well understood. A restricted discretionary activity status for non-compliance with the permitted standards is therefore sought.</p>	
20	Natural Hazards – Rule NH-R6	Support	The PDP seeks to manage the risk from natural hazards to people, property and infrastructure. Foodstuffs are supportive of the permitted activity rule for additions and alterations to existing buildings and a restricted discretionary activity status where there is non-compliance with this rule.	Retain Rule NH-R6 as notified.
21	Natural Hazards – Rule NH-R8	Support, seek amendment	Foodstuffs support the permitted activity rule for new buildings in all zones within a coastal erosion hazard area or coastal flood hazard area. However, Foodstuffs consider that a discretionary activity status for non-compliance with NH-R8.1.a or NH-R8.1.b is	<p>Amend Rule NH-R8 as follows:</p> <p>“ ...</p> <p>2. <b>Activity status when compliance not achieved with NH-R8.1.a or NH-R8.1.b: <u>Restricted</u> Discretionary</b>”</p>

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			onerous when the scope of potential effects are limited and well understood. As such, a restricted discretionary activity status is supported.	
22	NH-R11	Oppose	Proposed rule NH-R11 duplicates and is inconsistent with the Regional Plan – Rule C.8.3.1.	Delete rule RH-R11.
<b>COASTAL ENVIRONMENT</b>				
23	Coastal Environment – Rule CE-R1	Support	Foodstuffs support the permitted activity status for external additions and alterations of buildings within the coastal environment, subject to compliance with permitted standards. Foodstuffs also support the restricted discretionary activity status for non-compliance with the permitted standards.	Retain CE-R1 as notified.
24	Coastal Environment – Rule CE-R2	Support	Foodstuffs support the permitted activity status for new buildings in the coastal environment (excluding ONCA), subject to compliance with permitted standards. Foodstuffs also support the restricted discretionary activity status for non-compliance with the permitted standards.	Retain CE-R2 as notified.
25	Coastal Environment – Standards CE-S1 & CE-S2	Support	Foodstuffs support the permitted height and exterior colour and reflectivity thresholds for buildings in the coastal environment.	Retain CE-S1 & CE-S3 as notified.

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26	Coastal Environment – Standard CE-S3	Support	Foodstuffs support the permitted threshold of 300m <sup>2</sup> for buildings in the coastal environment outside HNCA and ONCA.	Retain CE-S3 as notified.
<b>SIGNS</b>				
27	Signs – Rule SIGN-R4	Seek amendment	<p>Foodstuffs consider that where signage is attached to a building or window and is directly related to the use of that building comprises branding, it should be exempt from the sign size (SIGN-S2) and number of signs (SIGN-S4) standards.</p> <p>Accordingly, Foodstuffs seeks the following amendments to SIGN-R4 and suggests that a separate rule be included to address signage on or attached to a structure, fence or wall.</p>	<p>Amend SIGN-R4 as follows (or to similar effect):</p> <p><b>“Signs on or attached to a building or structure, window, fence or wall</b></p> <p><b>1. Activity status:</b> Permitted</p> <p><b>Where:</b></p> <ol style="list-style-type: none"> <li>The sign does not protrude above the highest point of the building or structure;</li> <li>The sign relates to goods and services available on the site; and</li> <li>The sign complies with: <ol style="list-style-type: none"> <li>SIGN-S1 Traffic safety for signs;</li> <li><del>SIGN-S2 Sign Size; and</del></li> <li><del>SIGN-S4 Number of signs.</del></li> </ol> </li> </ol>
<b>AREA SPECIFIC MATTERS - ZONES</b>				
<b>Commercial Zone</b>				
28	Commercial Zone – Rule COMZ-R1	Support	COMZ-R1 provides for new buildings and structures and alterations or additions to any	Retain COMZ-R1 as notified.

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			<p>existing building or structure as a permitted activity, subject to compliance with permitted standards.</p> <p>Foodstuffs support this permitted activity status, as well as the restricted discretionary activity status for non-compliance with this rule.</p>	
29	Commercial Zone – Rule COMZ-R2	Support, seek amendment	Foodstuffs support that commercial activities are a permitted activity under this rule, but seek clarification that ‘supermarkets’ are considered to fall under the definition of commercial activities.	Retain COMZ-R2 as notified, noting request for amendment in earlier submission point regarding a definition of “supermarkets” and the nested definition of commercial activities.
30	Commercial Zone – Standard COMZ-S1	Oppose	<p>Foodstuffs do not consider that activities such as supermarkets (non-residential buildings) should be subject to urban design standards such as this one, particularly within a Commercially zoned site. Potential conflicts between maximising commercial opportunities and adhering to strict aesthetic guidelines may result, which are more appropriate for residential zones or residential activities.</p> <p>Further, the majority of supermarkets are over 1,500m<sup>2</sup>, meaning that maximum permitted GFA of 1,000m<sup>2</sup> does not provide sufficient GFA, and Foodstuffs would need to apply for unnecessary consents.</p>	Delete COMZ-S1 as notified or amend to exclude supermarkets from this requirement.

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31	Commercial Zone – Standard COMZ-S5	Seek amendment	Foodstuffs consider that it is inappropriate to have supermarkets subject to the pedestrian frontage requirements. Supermarkets have operational and functional needs for building designs which are not addressed by a blunt application of the pedestrian frontage rule in the Commercial Zone.	Delete COMZ-S5 as notified or amend to exclude supermarkets from this requirement.
Light Industrial Zone				
32	Light Industrial Zone – Objective LIZ-O2 Non-industrial Activities	Seek amendment	Given the limited zoning framework provided for in the PDP, Foodstuffs consider that greater provisions for commercial activities, such as supermarkets, should be provided for within the Light Industrial Zone. Such activities can be compatible with the adverse effects generated by light industrial activities.	Amend LIZ-O2 as follows:  “The Light industrial zone is not developed or used for non-industrial activities, unless they are associated with industrial activities <u>and commercial activities that are</u> and compatible with the potential adverse effects generated from light industrial activities.”
33	Light Industrial Zone – Policy LIZ-P1 Sufficient Land Supply	Seek amendment	Given the limited zoning framework provided for in the PDP, Foodstuffs consider that greater provisions for commercial activities, such as supermarkets, should be provided for within the Light Industrial Zone. Such activities can be compatible with the adverse effects generated by light industrial activities.	Amend LIZ-P1 as follows:  “Enable light industrial activities to establish and function efficiently, and maintain land available for light industrial activities in the zone by: <del>Avoiding</del> <u>Managing</u> non-industrial uses establishing in the zone <del>except</del> <u>by enabling industrial or commercial</u> activities that are ancillary to or support industrial activities and are compatible with the adverse effects of industrial activities;

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				Avoiding excessive fragmentation of the land by subdivision and development; and Avoiding establishment of sensitive activities that are likely to result in reverse sensitivity effects, except where there is an identified operational need."
34	Light Industrial Zone – Policy LIZ-P2	Seek amendment	Foodstuffs seek to amend this policy to also allow commercial activities which require larger sites and may not be compatible with the amenity values anticipated in the Commercial Zone.  Foodstuffs consider that the Light Industrial Zone is a suitable place to have a supermarket due to larger site sizes, more space for carparking, and less sensitive neighbours.	Delete LIZ-P2 and replace as follows:  <b><u>"1. To manage non-industrial activities by ensuring that they:</u></b> <ul style="list-style-type: none"> <li>a. <b><u>Are not likely to generate reverse sensitivity effects that constrain the establishment and operation of industrial activities.</u></b></li> <li>b. <b><u>Support, or are compatible with, the operation of industrial activities within the Zone.</u></b></li> <li>c. <b><u>Ensure that the potential establishment of future industrial activities is not compromised by the nature, scale and design of activities and buildings.</u></b></li> </ul>
35	LIZ-P7	Seek amendment	Policy LIZ-P7 seeks to limit subdivision and development where it is not connected to public reticulated infrastructure but omits the option for onsite servicing. Many industrial areas are not benefited by council infrastructure and can be suitably serviced on site.	Amend LIZ-P7 as follows:  "Limit subdivision and development where it is not connected to public reticulated

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				infrastructure # <u>or serviced by onsite facilities.</u> "
36	Light Industrial Zone – Rule LIZ-R1	Support	<p>LIZ-R1 provides for new buildings and structures and alterations or additions to any existing building or structure as a permitted activity, subject to compliance with permitted standards.</p> <p>Foodstuffs support this permitted activity status, as well as the restricted discretionary activity status for non-compliance with this rule.</p>	Retain Rule LIZ-R1 as notified.
37	LIZ-R4, LIZ-R5 and LIZ-R6	Seek amendment	<p>The PDP does not include a definition of 'retail activity' it is unclear what constitutes 'convenience food retail' or 'wholesalers'. The rules have different maximum GFA, this inconsistency is unclear when the potential effect of retail is relatively consistent. The rules also do not appear to give effect to the relevant policies, it is unclear as to why they have been proposed and how they relate to the objectives of the zone.</p>	Insert definitions of heavy industrial activity and retail activity. Amend the rules to apply consistent standards to retail activities and to give effect to the relevant policies.
38	Light Industrial Zone – Rule LIZ-R18	Oppose	<p>LIZ-R18 provides for retail activities that are not otherwise provided for as a non-complying activity.</p> <p>Foodstuffs consider this problematic, as the Light Industrial Zone is considered appropriate for development such as</p>	Delete LIZ-R18 OR provide a new permitted activity rule for supermarkets in the Light Industrial Zone.

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# Foodstuffs Submission on PDP

Sub #	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought
			supermarkets due to larger site sizes, more room for carparking and less sensitive neighbours.	
Special Purpose Zones – Estuary Estates (Mangawhai Central)				
39	Estuary Estates (Mangawhai Central) – Sub-Zones	Support	Foodstuffs are supportive of New World Mangawhai being located within the Business Sub-Zone.	Retain as notified.
40	Estuary Estates (Mangawhai Central) – Rule EESPZ-R1	Support	<p>Rule EESPZ-R1 provides for new buildings and structures and alterations or additions to any existing building or structure as a permitted activity, subject to compliance with permitted standards.</p> <p>Foodstuffs support this permitted activity status, as well as the restricted discretionary activity status for non-compliance with this rule.</p>	Retain Rule EESPZ-R1 as notified.
41	Estuary Estates (Mangawhai Central) – Rule EESPZ-R18	Support	Foodstuffs support that commercial activities are a permitted activity under this rule, but seek clarification that ‘supermarkets’ are considered to fall under the definition of commercial activities.	Retain Rule EESPZ-R18 as notified.