



30 October 2019

Eden Edwardson
Support Assistant – District Plan
Whangarei District Council
Private Bag 9023
WHANGAREI 0148

BY EMAIL

Dear Sir / Madam

RE: PC888 URBAN AND SERVICES PLAN CHANGE PACKAGE: SECTION 42A REPORT: HEARING OF SUBMISSIONS

On behalf of Woolworths New Zealand Limited (WNZL), having now read the officers section 42A reports, I advise that WNZL does not wish to appear at the hearing to speak to its submissions. However, on behalf of WNZL, we request that this letter be tabled at the hearing for consideration by the Hearings Panel.

We comment on the officer recommendations under a series of headings in the order they appear in the report sequence.

Part 3: PC 88F – Shopping Centre Zone

WNZL supports the officer recommendation for subclause 1 of SCZ-R11 and supports the recommendation that subclause 2, requiring that a supermarket occurs in an existing building, be deleted.

Part 4: PC 88E – Centres

i. Wording of LC-P10

WNZL supports the officer recommendation that reference to supermarkets in this policy be deleted.

ii. Wording of LC-R3(2) Setbacks

WNZL supports the officer recommendation to accept in part its submission point and exempt grocery stores from the setback requirements of this rule.

iii. Wording of LC-R6 Building Frontages

WNZL supports the officer recommendation to accept in part its submission point that the reference to continuous blank walls be deleted. WNZL remains concerned about the requirement that 65% of the building frontage at the ground floor level is clear glazing.

Most modern Countdown supermarkets are unable to meet such a requirement for food safety and display reasons.

iv. Wording of LC-R12 Car Parking

WNZL supports the officer recommendation to accept in part its submission point that grocery stores should be exempt from the requirement to locate car parking spaces behind a building.

v. Wording of LC-R15 Grocery Store

The officer recommendation to reject WNZL's request to change "grocery store" to supermarket is disappointing as almost without exception across New Zealand second generation District Plans include the word 'supermarket' and define this term. WNZL requests that the Hearings Panel carefully consider whether the word 'supermarket' should be used in the plan change. We note that Foodstuffs NZ have requested the same wording.

vi. Wording of LC-R27 Vehicle Crossing over a Footpath

The officer recommendation to reject WNZL's submission to change the activity status from discretionary to restricted discretionary is disappointing as at least one vehicle crossing is essential for any site being developed or re-developed.

Part 8: Zonings

Retention of LC zoning across supermarket sites

WNZL supports the officer recommendations (paragraphs 103 and 106) to retain the LC zoning and to extend such zoning across its Wallace Street properties now used as part of the supermarket carpark. This is a pragmatic recommendation.

Part 9: Transport

i. TRA-R11 and R12: Landscaping within Parking Areas & Tree Planting within Parking Areas

WNZL supports the officer recommendations changing the activity status for any non-compliance from full discretionary to restricted discretionary.

ii. TRA-R15 and R16: Integrated Traffic Assessments

WNZL supports the officer recommendation to accept its submission in part.

iii. Table TRA 1 – Bicycle Parking Rates

WNZL support the officer recommendation that adopts its submission to amend the bicycle parking rate to 1 per 15 employees. This is a pragmatic recommendation.

Part 10: Signs – S1 – R9

WNZL supports the officer recommendation to retain restricted discretionary activity status.

Should you have any queries regarding the foregoing or require further clarification please do not hesitate to contact me.

Yours faithfully
Zomac Planning Solutions Ltd

A handwritten signature in blue ink, appearing to be 'MJ Foster', written in a cursive style.

M J Foster
DIRECTOR