

RMA FORM 5

Submission on publicly notified Proposed

Porirua District Plan

Clause 6 of the First Schedule, Resource Management Act 1991



To: Porirua City Council

1. Submitter details:

Company/Organisation <i>if applicable</i>	Woolworths New Zealand Limited	
Contact Person <i>if different</i>	Holly Jenkins / Rachel Ritchie The Property Group Limited	
Email Address for Service	rritchie@propertygroup.co.nz	
Address for Service <i>if different</i>	<i>Postal Address</i> The Property Group Limited PO Box 2874 Wellington 6140	<i>Courier Address</i> The Property Group Limited Level 11, Cornerstone House 36 Customhouse Quay Wellington 6011
Phone	<i>Work</i> 027 339 1666	

2. This is a **submission** on the **Proposed District Plan** for Porirua.

3. I could I could not
gain an advantage in trade competition through this submission.
(Please tick relevant box)

If **you could** gain an advantage in trade competition through this submission, please complete point four below:

4. I am I am not
directly affected by an effect of the subject matter of the submission that:
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.
(Please tick relevant box if applicable)

Note:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

5. I wish I do not wish
 To be heard in support of my submission *(Please tick relevant box)*

6. I will I will not
 Consider presenting a joint case with other submitters, who make a similar submission, at a hearing. *(Please tick relevant box)*

Submission point 1

The specific provision of the proposal that my submission relates to:
Part 1: Introduction and General Provisions – Introduction
Do you: Support? Oppose? Amend?
None
What decision are you seeking from Council? What action would you like: Retain? Amend? Add? Delete?
None
Reasons:
<p>Thank you for the opportunity to submit on this plan. Woolworths New Zealand Limited (Woolworths NZ) supports the general direction of the Proposed District Plan to provide for sustainable growth in Porirua City, provided the objectives, policies and rules are also developed to enable existing operations to continue and encourage growth in appropriate locations.</p> <p>Woolworths NZ currently operates 183 Countdown stores and 3 e-stores nationwide and employs over 21,400 people. Woolworths NZ is also the franchisor for the Fresh Choice and Super Value brands, with a further 70 stores nationwide.</p> <p>There are two Countdown stores in Porirua City: Countdown Porirua: Corner of Parumoana Street and Lyttleton Avenue, Porirua Countdown Aotea: 3 Whitford Brown Avenue, Papakowhai</p> <p>Woolworths NZ is proud to work with communities and councils to create and deliver successful supermarkets that support and foster community wellbeing.</p>

Submission point 2

<p>The specific provision of the proposal that my submission relates to:</p> <p>Part 1: Introduction and General Provisions – Interpretation – Definitions: <i>Supermarket</i></p> <p><i>means a retail shop selling a wide range of foodstuffs and non-food grocery items for consumption and use off-site, where foodstuffs comprise more than 90 percent of the total retail floor space. Foodstuffs include:</i></p> <ol style="list-style-type: none"> <i>a. fresh produce, meat, fish and dairy; and</i> <i>b. chilled, frozen, packaged, canned and bottled foodstuffs and beverages.</i> <p><i>Non-food grocery items include:</i></p> <ol style="list-style-type: none"> <i>a. cooking, cleaning and washing products;</i> <i>b. kitchenwares; and</i> <i>c. toiletries.</i>
<p>Do you: Support? Oppose? Amend?</p> <p>Oppose in Part - Amend</p>
<p>What decision are you seeking from Council? What action would you like: Retain? Amend? Add? Delete?</p> <p>Amendments sought.</p> <p>Woolworths NZ request that the definition be amended:</p> <ul style="list-style-type: none"> • To specify that total retail floor space only applies to that area of a store displaying foodstuffs and non-food grocery items. • To include pharmacy related activities. • To require foodstuffs to comprise more than 80 percent of the total retail floor space (not 90 percent as is currently proposed in the wording).
<p>Reasons:</p> <p>Woolworths NZ support the inclusion of a specific definition providing for supermarkets but consider that this definition is unnecessarily strict and does not provide for the changing nature and range of services provided by supermarkets. The proposed definition of a supermarket covers the majority of activities conducted by Countdown supermarkets. However, the definition should also specifically include 'pharmacy related activities' as a number of Countdown supermarkets have in-store pharmacies. Not including these activities would potentially mean that any supermarket that did include pharmacy activities would not meet the definition of supermarket. The inclusion of pharmacy related activities would have no material effect on the environment.</p> <p>In addition, the definition requires that foodstuffs comprise more than 90% of the total retail floor space. In comparison, the Auckland Unitary Plan allows supermarkets to include retail stores where foodstuffs comprise more than 80% of the total retail floor space. This allows for the range of activities that Countdown stores typically include, without comprising its primary role of selling foodstuffs.</p>

It is also unclear whether total retail floor space would include checkout and associated areas, as when these areas are combined with aisles displaying non-food grocery items, it would be difficult for a supermarket to be able to comply with the required 90% of total retail floor space threshold.

Submission point 3

The specific provision of the proposal that my submission relates to:
<p>Part 2: District-Wide Matters – Hazards and Risks – NH – Natural Hazards</p> <p><i>NH-R8 Any Hazard Sensitive Activity and Potentially Hazard Sensitive Activity and associated buildings within the High Hazard Areas in a Natural Hazard Overlay.</i></p> <p><i>Activity status: Non-complying</i></p>
Do you: Support? Oppose? Amend?
Oppose - amend
What decision are you seeking from Council?
What action would you like: Retain? Amend? Add? Delete?
<p>Amendments sought.</p> <p>Remove the requirement for Potentially Hazard Sensitive Activities to obtain resource consent as a Non-Complying Activity. Request this be amended to require resource consent as a Restricted Discretionary Activity.</p>
Reasons:
<p>Woolworths NZ notes that its Countdown Porirua store is located entirely within the Ohariu Fault Rupture Zone under the Proposed District Plan. The Ohariu Fault Rupture Zone extends from Porirua Harbour in the north, before splitting into two arms, with the eastern arm running through the Porirua CBD from north-east to south-west and is considered a High Hazard Area. Under the Proposed District Plan, Hazard Sensitive Activities and Potentially Hazard Sensitive Activities in a High Hazard Area require resource consent as a Non-Complying Activity under Rule NH-R8. Potentially Hazard Sensitive Activities include all commercial, large format and retail activities.</p> <p>Woolworths NZ understand and support Hazard Sensitive Activities, such as residential uses, having a higher activity status, noting that this is consistent with approaches taken in other parts of the country. However, Woolworths NZ do not agree that Potentially Hazard Sensitive Activities should require resource consent as a Non-Complying Activity. This means that these activities are not anticipated by the Proposed District Plan, which is at odds with the underlying City Centre Zone which specifically seeks to provide for a diverse range of activities, including those categorised as Potentially Hazard Sensitive Activities. Rule NH-R8 also does not clearly establish whether the rule applies to the extension of existing Potentially</p>

Hazard Sensitive Activities (where existing use rights do not apply), or whether the rule only applies to new Potentially Hazard Sensitive Activities in a High Hazard Area.

Given that such a large area of the City Centre Zone is within the Ohariu Fault Rupture Zone, Woolworths NZ considers that there is a significant issue with the interrelationship between the Natural Hazard chapter and the City Centre Zone chapter of the Proposed District Plan.

Submission point 4

The specific provision of the proposal that my submission relates to:
<p>Part 2: District Wide Matters – Energy, Infrastructure and Transport – TR - Transport</p> <p><i>TR-R5 Trip generation</i></p> <p><i>All zones</i></p> <p><i>1. Activity status: Permitted</i></p> <p><i>Where:</i></p> <p style="padding-left: 20px;"><i>a. Compliance is achieved with TR-S10 Trip generation thresholds.</i></p> <p><i>All zones</i></p> <p><i>3. Activity status: Restricted discretionary</i></p> <p><i>Where:</i></p> <p style="padding-left: 20px;"><i>a. Compliance is not achieved with TR-S10 Trip generation thresholds.</i></p> <p><i>Matters of discretion are restricted to:</i></p> <p style="padding-left: 20px;"><i>1. The matters in TR-P1.</i></p> <p><i>Section 88 information requirements for applications:</i></p> <p><i>Applications under this rule must provide, in addition to the standard information requirements:</i></p> <p style="padding-left: 20px;"><i>a. An Integrated Transport Assessment by a suitably qualified transport engineer or transport planner. The Waka Kotahi NZ Transport Agency guidelines “Research Report 422: Integrated Transport Assessment Guidelines, November 2010” should be used to inform any Integrated Transport Assessment.</i></p>
Do you: Support? Oppose? Amend?
Oppose - amend
What decision are you seeking from Council? What action would you like: Retain? Amend? Add? Delete?
Amendments sought.

Woolworths NZ request that the standard be amended to include a non-notification clause for public and limited notification. It is also requested that the matters of discretion under this rule be amended to remove the need for consideration of *“the effect of the proposed activity on the character and amenity values of the surrounding area”* (Policy TR-P1(5)).

Reasons:

Woolworths NZ note that a supermarket would require resource consent under Rule TR-R5 as a commercial activity where the gross floor area exceeds 1,000m². As this rule should be limited to traffic related matters only, being the effect of the proposal on the operation of the transport network, which will be canvassed in the Integrated Transport Assessment to be provided with any resource consent application, it is considered appropriate for this rule to have a non-notification clause applying to both public and limited notification.

It is also noted that the matters of discretion under Rule TR-P1 includes the need to consider *“the effect of the proposed activity on the character and amenity values of the surrounding area”* (Policy TR-P1(5)). This is not considered relevant to the consideration of high traffic generator activities, whereby the purpose is to control transport related effects on the roading network. Amenity related effects will be considered as part of the rule framework for the underlying zone.

Submission point 5

The specific provision of the proposal that my submission relates to:

Part 3: Area Specific Matters – Commercial and Mixed Use Zones – CCZ - City Centre Zone

CCZ-R19 Ground level parking

Activity status: Restricted discretionary

Do you: Support? Oppose? Amend?

Oppose - amend

What decision are you seeking from Council?

What action would you like: Retain? Amend? Add? Delete?

Amendments sought.

Woolworths NZ request that the activity status for ground level parking not visible from the road or a public space be amended to be a Permitted Activity.

If Council do not agree to ground level parking not visible from the road or a public space being provided for as a Permitted Activity, Woolworths NZ request that the matters of discretion are amended to remove the requirement for consistency with the City Centre Zone Design Guide, and instead be replaced with the

<p>following wording: <i>Regard should be had to the City Centre Zone Design Guide contained in APP4-City Centre Zone Design Guide.</i></p>
<p>Reasons:</p> <p>Woolworths NZ note the policies in the City Centre Zone seek to minimise the adverse effects of carparking on the amenity and quality of the streetscape and public open spaces. However, this rule appears to apply to any ground level carparking, irrespective of where it is located (e.g.: within a building) or whether it is visible from a public space. Woolworths NZ request that a permitted activity be provided to permit the creation of ground level carparking, or changes to existing ground level carparking, that is not visible from the road or a public space.</p> <p>It is noted that ground level carparking which complies with CCZ-S5, currently requires resource consent as a Restricted Discretionary Activity, with discretion restricted to the following matters in CCZ-P7: <i>Only allow for ground level car parking where:</i></p> <ol style="list-style-type: none"> <i>1. It is not located along a primary frontage identified on the planning maps;</i> <i>2. Any adverse effects on the amenity and quality of the streetscape and public open spaces can be minimised; and</i> <i>3. It is consistent with the City Centre Zone Design Guide contained in APP4-City Centre Zone Design Guide.</i> <p>Woolworths NZ notes that the City Centre Zone Design Guide covers a wide range of matters, many of which are unrelated to streetscape matters. Requiring consistency with the Design Guide provides the Council with unnecessarily wide matters which may be considered for a proposal that may involve the provision of carparking which is not visible from a public space due to location or screening.</p>

Submission point 6

<p>The specific provision of the proposal that my submission relates to:</p>
<p>Part 3: Area Specific Matters – Commercial and Mixed Use Zones – CCZ - City Centre Zone</p> <p><i>CCZ-R2 Erection, construction and development of additions to existing buildings and structures</i> <i>Activity status: Restricted discretionary</i></p>
<p>Do you: Support? Oppose? Amend?</p>
<p>Oppose - Amend</p>
<p>What decision are you seeking from Council? What action would you like: Retain? Amend? Add? Delete?</p>
<p>Amendments sought.</p> <p>Woolworths NZ Ltd request that where the matters of discretion under Rule CCZ-R2, are amended to:</p>

- Remove reference to policy CCZ-P7, as this only applies to carparking and all ground level carparking is captured by Rule CCZ-R19
- Remove the need under CCZ-P5 and CCZ-P6 for consistency with the Design Guide, and replace with the following wording:
Regard should be had to the City Centre Zone Design Guide contained in APP4-City Centre Zone Design Guide.

Reasons:

Woolworths NZ note under Rule CCZ-R2, development which complies with CCZ-S1 to CCZ-S6, requires resource consent as a Restricted Discretionary Activity, with discretion restricted to the matters listed in policies CCZ-P5, CCZ-P6 and CCZ-P7.

The matters listed under policies CCZ-P5, CCZ-P6 and CCZ-P7 cover a wide range of design related matters with the purpose of providing for high quality development and active street frontages. It is noted that CCZ-P7 addresses carparking, which is captured under a separate rule CCZ-R19, so it is unclear why discretion under CCZ-R2 also refers to CCZ-P7.

Woolworths NZ notes policies CCZ-P5, CCZ-P6 and CCZ-P7 all require development to be consistent with the City Centre Zone Design Guide. Requiring consistency with the Design Guide provides the Council with unnecessarily wide matters which may be considered for a proposal. As the Design Guide is only a guide – with provisions written as such – it is unclear how consistency will be established by Council officers at the time of a resource consent.

Submission point 7

The specific provision of the proposal that my submission relates to:

Part 3: Area Specific Matters – Commercial and Mixed Use Zones – CCZ - City Centre Zone

CCZ-R16 Large format retail activity

1. Activity status: Restricted discretionary

Matters of discretion are restricted to:

1. The matters in CCZ-P3

Do you: Support? Oppose? Amend?

Oppose - amend

What decision are you seeking from Council?

What action would you like: Retain? Amend? Add? Delete?

Amendments sought.

Woolworths NZ Ltd request that supermarkets be made a permitted activity in the City Centre Zone.

Woolworths NZ Ltd request that if Council do not agree to supermarkets being provided for as a Permitted Activity in the City Centre Zone, and thereby require resource consent as a Restricted Discretionary Activity, that the matters of discretion be amended to remove the requirement for consistency with the City Centre Zone Design Guide, and instead be replaced with the following wording:

Regard should be had to the City Centre Zone Design Guide contained in APP4-City Centre Zone Design Guide.

It is also requested that Rule CCZ-R16 be provided with a non-notification clause for both limited and public notification.

Reasons:

Woolworths NZ note that the Proposed District Plan only provides for supermarkets as a Permitted Activity in the Large Format Zone and Mixed Use Zone. Both of these zones cover only a small area of land in Porirua City. Supermarket activities are appropriately located within the City Centre Zone, which seeks to encourage a wide range of activities, as evidenced by many existing supermarkets in Porirua being located within the City Centre Zone. Any adverse effects from a supermarket can be appropriately controlled through rules and standards in the City Centre Zone applying to the buildings, carparking and associated activities that are provided by a supermarket.

Should Council not consider supermarkets to be a Permitted Activity in the City Centre Zone, it is considered appropriate for a non-notification clause to apply to Rule CCZ-R16 for supermarkets. There are multiple other activities within the City Centre Zone that are provided with a non-notification clause despite having potentially greater adverse effects than would be anticipated from a supermarket. The lack of certainty on notification would affect decisions by Woolworths NZ on the location of future stores in Porirua.

Woolworths NZ notes policies CCZ-P3, which is a matter of discretion under Rule CCZ-R16, requires development to be consistent with the City Centre Zone Design Guide. Requiring consistency with the Design Guide provides the Council with unnecessarily wide matters which may be considered for a proposal. As the Design Guide is only a guide – with provisions written as such – it is unclear how consistency will be established by Council officers at the time of a resource consent.

Submission point 8

The specific provision of the proposal that my submission relates to:

Part 3: Area Specific Matters – Commercial and Mixed Use Zones – CCZ – City Centre Zone

CCZ-S2 Active street frontages

1. *Along building lines identified on the planning maps all buildings must be built up to and oriented towards the identified building line and provide a veranda that:*

- a. Extends along the entire length of the building frontage;
- b. Provides continuous shelter with any adjoining veranda; and
- c. Has a minimum setback of 500mm from any kerb face.

2. For sites with primary street-facing façade controls identified in the planning maps:

- a. At least 55% of the ground floor building frontage must be display windows or transparent glazing; and
- b. The principal public entrance to the building must be located on the front boundary.

3. For sites with secondary street-facing façade controls identified in the planning maps at least 35% of the ground floor building frontage must be display windows or transparent glazing.

Do you: Support? Oppose? Amend?

Oppose - amend

What decision are you seeking from Council?

What action would you like: Retain? Amend? Add? Delete?

Amendments sought.

Woolworths NZ Ltd request that the standard be amended to enable landscaping to be provided along the building line where it is not feasible to construct a building up to the identified building line or provide a continuous verandah and/or glazing.

Reasons:

Woolworths NZ understand that the purpose of Standard CCZ-S2 is to encourage the provision of active street frontages in the City Centre Zone. However, for supermarkets, which have an operational need to provide carparking for its customers, this rule encourages carparking to be located at the rear of buildings on sites with building lines identified on planning maps. This is specifically discouraged through CPTED principles as it creates large open areas at the rear of buildings.

To avoid conflict with CPTED principles, Woolworths NZ request that the standard be amended to include a provision for supermarkets to provide landscaping along the identified building lines where it is not feasible to provide a verandah or continuous shelter.

Notwithstanding the above, a core part of the operation of a supermarket is the large scale storage of the goods that are sold on-site. It is entirely impractical for a supermarket building to have an active frontage on all sides of a sites where it has multiple frontages to streets subject to building lines, as is the case for the Countdown Porirua site.

Submission point 9**The specific provision of the proposal that my submission relates to:**

Part 3: Area Specific Matters – Commercial and Mixed Use Zones – LCZ – Local Centre Zone

LCZ-R1 Buildings and structures, including additions and alterations

1. *Activity status: Permitted*

Where:

- a. *The gross floor area of the new building does not exceed 450m²;*
- b. *Any addition to an existing building does not result in the total gross floor area of the building exceeding 450m²; and*
- c. *Compliance is achieved with*
 - i. *LCZ-S1;*
 - ii. *LCZ-S2;*
 - iii. *LCZ-S3;*
 - iv. *LCZ-S4;*
 - v. *LCZ-S5;*
 - vi. *LCZ-S6; and*
 - vii. *LCZ-S7.*

2. *Activity status: Restricted discretionary*

Where:

- a. *Compliance is not achieved with LCZ-R1-1.a or LCZ-R1-1.b.*

Matters of discretion are restricted to:

1. *The matters in LCZ-P5 and LCZ-P6.*

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.

3. *Activity status: Restricted discretionary*

Where:

- a. *Compliance is not achieved with LCZ-S1, LCZ-S2, LCZ-S3, LCZ-S4 LCZ-S5, LCZ-S6 or LCZ-S7.*

Matters of discretion are restricted to:

1. *The matters of discretion of any infringed standard.*

Notification:

- *An application under this rule where compliance is not achieved with LCZ-S2, LCZ-S3, LCZ-S4, LCZ-S5 or LCZ-S7 is precluded from being publicly notified in accordance with section 95A of the RMA.*
- *An application under this rule where compliance is not achieved with LCZ-S6 is precluded from being publicly or limited notified in accordance with sections 95A and 95B of the RMA.*

Do you: Support? Oppose? Amend?
Oppose - amend
What decision are you seeking from Council? What action would you like: Retain? Amend? Add? Delete?
Amendments sought. Woolworths NZ request that the provision be amended to remove the requirement that any new building, addition or alteration be less than 450m ² .
Reasons:
Woolworths NZ consider that the requirement for any new building, addition or alteration to be less than 450m ² is an unnecessary control as all effects relating to building design and location are adequately addressed through standards LCZ-S1 to LCZ-S7. These standards must be complied with for any new development and set the minimum bulk, location and design requirements for the Local Centre Zone. There is subsequently no need for a control on the gross floor area for new development.

Submission point 10

The specific provision of the proposal that my submission relates to:
Part 3: Area Specific Matters – Commercial and Mixed Use Zones – LCZ – Local Centre Zone <i>LCZ-R12 Supermarket</i> <i>2. Activity status: Restricted discretionary</i> <i>Where:</i> <i>a. Compliance is achieved with LCZ-S7 Screening and landscaping of service areas, outdoor storage areas and parking areas</i> <i>Matters of discretion are restricted to:</i> <i>1. The matters in LCZ-P3</i> <i>2. Activity status: Discretionary</i> <i>Where:</i> <i>a. Compliance is not achieved with LCZ-S7 Screening and landscaping of service areas, outdoor storage areas and parking areas</i>

Do you: Support? Oppose? Amend?
Oppose - Amend
What decision are you seeking from Council? What action would you like: Retain? Amend? Add? Delete?
<p>Amendments sought.</p> <p>Woolworths NZ request that the activity status for supermarkets be amended to be a Permitted Activity. Alternatively, if Council pursues a Restricted Discretionary Activity status, Woolworths NZ request a non-notification clause for both public and limited notification be inserted for the rule.</p>
Reasons:
<p>Woolworths NZ note that the Proposed District Plan only provides for supermarkets as a Permitted Activity in the Large Format Zone and Mixed Use Zone. Both of these zones cover only a small area of land in Porirua City. Supermarket activities are appropriately located within Local Centre Zones, servicing the needs of the surrounding residential catchments, as evidenced by the majority of existing supermarkets in Porirua being located within the Local Centre Zone. Any adverse effects from a supermarket are appropriately controlled through rules and standards applying to the buildings, carparking and associated activities that are provided by a supermarket. In particular, it is noted that under Rule LCZ-R1, resource consent will be required for any new supermarket building, including additions and alterations, that exceed 450m², which is significantly less than the gross floor area of a typical supermarket.</p> <p>Should Council not consider that supermarkets to be a Permitted Activity in the Local Centre Zone, it is considered appropriate for a non-notification clause for both limited and public notification to apply to Rule LCZ-R12 for supermarkets. There are multiple other activities within the Local Centre Zone that are provided with a non-notification clause despite having potentially greater adverse effects than would be anticipated from a supermarket. The lack of certainty on notification would affect decisions by Woolworths NZ on the location of future stores in Porirua.</p>

Submission point 11

The specific provision of the proposal that my submission relates to:
<p>Part 3: Area Specific Matters – Commercial and Mixed Use Zones – LCZ – Local Centre Zone</p> <p><i>LCZ-S4 Active street frontages</i></p> <p><i>1. Along building lines identified on the planning maps all buildings must be built up to and oriented towards the identified building line and provide a veranda that:</i></p> <p style="margin-left: 40px;"><i>a. Extends along the entire length of the building frontage;</i></p> <p style="margin-left: 40px;"><i>b. Provides continuous shelter with any adjoining veranda; and</i></p>

- c. *Has a minimum setback of 500mm from any kerb face.*
- 2. *For sites with primary street-facing façade controls identified on the planning maps:*
 - a. *At least 55% of the ground floor building frontage must be display windows or transparent glazing; and*
 - b. *The principal public entrance to the building must be located on the front boundary.*
- 3. *For sites with secondary street-facing façade controls identified on the planning maps:*
 - a. *At least 35% of the ground floor building frontage for non-residential activities must be display windows or transparent glazing*

Do you: Support? Oppose? Amend?

Oppose - amend

What decision are you seeking from Council?

What action would you like: Retain? Amend? Add? Delete?

Amendments sought.

Woolworths NZ request that the standard be amended to enable landscaping to be provided along the building line where it is not feasible to build a building up to the identified building line.

Reasons:

Woolworths NZ understand that the purpose of Standard LCZ-S4 is to encourage the provision of active street frontages in the Local Centre Zone. However, for supermarkets, which have an operational need to provide carparking for its customers, this rule encourages carparking to be located at the rear of buildings on sites with building lines identified on planning maps. This is specifically discouraged through CPTED principles as it creates large open areas at the rear of buildings.

To avoid conflict with CPTED principles, Woolworths NZ request that the standard be amended to include a provision for supermarkets to provide landscaping along the identified building lines where it is not feasible to provide a verandah or continuous shelter.

Woolworths NZ’s Countdown Aotea store is the only site in the vicinity zoned Local Centre Zone – all adjoining sites are within the General Residential Zone. It is not clear why this site is recognised as having active street frontages, given it is a single site that is not signalled by the Proposed District Plan as developing into a larger Local Centre in the future. As such, requiring active street frontages along a single site is unnecessarily onerous and will create little benefit to the surrounding area.

Notwithstanding the above, a core part of the operation of a supermarket is the large scale storage of the goods that are sold on-site. It is entirely impractical to for a supermarket building to have an active frontage

on all sides of a site where it has multiple frontages to streets subject to building lines, as is the case of the Countdown Aotea site.

Please return this form no later than **5pm on Friday 20 November 2020** to:

- Proposed District Plan, Environment and City Planning, Porirua City Council, PO Box 50-218, PORIRUA CITY or
- email dpreview@pcc.govt.nz

Signature of submitter
(or person authorised
to sign
on behalf of submitter):



20th November 2020

Date: _____

*A signature is not required if you make
your submission by electronic means*