

SUBMISSIONS ON PROPOSED REGIONAL POLICY STATEMENT FOR WELLINGTON

To: Chief Executive Officer
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Name of Submitter: Foodstuffs (Wellington) Co operative Society Ltd
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1. The full details of the submission and the decisions sought from the council are contained in the attached paper.
2. Foodstuffs wishes to be heard in support of this submission.
3. Foodstuffs would be prepared to consider presenting its submission in a joint case with others making a similar submission at any hearing



Chris Hansen
Authorised Agent for Foodstuffs

5/6/09

Date

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1 Foodstuff's interest in the Wellington Region

Foodstuffs (Wellington) Co operative Society (Foodstuffs) has a strong representation within the grocery market, in the lower North Island. This grocery store franchise is well recognised for its brands which include New World, Pack n Save, Write Price and Four Square. Foodstuffs has grocery stores in all the main centres within the Wellington region; a number within the Wellington CBD, Petone, Hutt City, Upper Hutt, Masterton, Waikane, Parararaumu.

Within the Wellington region Foodstuffs has 70% of the market share of grocery outlets and 100% of the market share within the Wellington inner city (CBD). Foodstuffs have a diverse range of locations: within heritage buildings (the train station and brew tower Thordon) and now expanding into mix use development, such as at Basin Reserve. In addition to these Supermarket entities, Foodstuffs has liquor outlets, and a main distribution centre (located in Silverstream).

Foodstuffs take an interest in regional plans from two perspectives – plan provisions may affect the existing store operations and how plan provisions affect their development opportunities into the future. When considering plans Foodstuffs wishes to ensure planning provisions are enabling and are not unduly restrictive.

The following submissions are made on behalf of Foodstuffs (Wellington) Co operative Society Ltd (Foodstuffs) to Wellington Regional Council's Proposed Regional Policy Statement (proposed RPS) for the Wellington Region.

2 General Comments

Foodstuffs have assessed the proposed Pan in detail in relation to its interests outlined above. Overall the intent of the proposed Plan is generally supported in principle by Foodstuffs; however a number of specific provisions are opposed in part due to the direction provided by the RPS to manage urban form, particularly retail and commercial space.

Foodstuffs main interest in the proposed RPS is in the '*Regional Form, Design and Function*' section Specific submission points relating to this section are address below.

3 Specific Submissions on Proposed Regional Policy Statement (RPS)

3.1 Regional Significant Centres

Submission:

- Foodstuffs **oppose in part** Policy 29 and Method 1;

The main goal of regionally significant centres is to concentrate development to identified centres to encourage compact, mixed use development in key locations. These provisions are significant for Foodstuffs as Foodstuffs has a strong presence within the identified 'regionally significant centres'.

Centre development, intensification of sites, and potential mixed use opportunities can have positive implications for Foodstuffs. Supermarket retailers within the centres and within the core urban areas are likely to be supported through these provisions of the RPS. Policy 29 identifies the importance of maintaining and enhancing the viability and vibrancy of regionally significant centres, all of which have Foodstuffs stores located within them.

However, the process and methods by which the regionally significant centres policies are implemented could negatively affect Foodstuffs interests. For example, SKM understands that Foodstuffs has been involved in the Draft Suburban Centre Plan Change, recently proposed by the Wellington City Council. We understand Foodstuffs has concerns about this draft policy as it proposes an overly restrictive and prescriptive approach to intensification potentially not allowing for adequate future development/alteration to meet supermarkets requirements. Depending on how these provisions are drafted, the effect of the regionally significant centres policy may have the potential to create a prescriptive approach to intensification, which does not meet the objective of this section of the RPS.

Foodstuffs also has interests in centres that are not defined as regionally significant and is concerned about the lack of balance in this policy as to how development should occur in other suburban centres.

Method 41 and 42 indicates the requirement to develop visions for the 'regionally significant centres' and principles for retail activities. Foodstuffs requests involvement in the development of these visions and retail principles.

Foodstuffs seek the following decision from Council:

Foodstuffs **requests** another policy be included outlining how retail outside of regionally significant centres is appropriate in some cases, for example where a supermarket serves a local centre.

3.2 Compact urban form policies and methods

Submission:

- Foodstuffs **support in part** Policy 30
- Foodstuffs **support in part** the principles in regards to compact, sustainable urban development and design principles within the Policies 53.

Policy 30 encourages intensification of existing development, and promotes mixed use. The shift towards mixed use intensification of the urban environment can be considered consistent with the direction Foodstuffs Wellington is heading in terms retrofitting commercial buildings and carrying out new mixed use developments such as the Rugby Street development by the Basin Reserve. However, Foodstuffs will require flexibility in regards to the location and design of its stores, to ensure that development is not unduly restricted by the implementation of this RPS at the district and regional planning level.

Policy 53 seeks to apply urban design principles. Foodstuffs supports good urban design practices, but urban design principles should not be applied in a way that compromises the functionality of supermarket developments.

Supermarkets are vital for the sustainability of urban centres and it is important to ensure functionality of larger scale retail stores.

Foodstuffs seek the following decision from Council:

Foodstuffs **requests** that further guidance is provided in the explanatory text in Policy 53 that the urban design principles are implemented to ensure that functionality of developments is well provided for, with flexible design standards adopted at the Regional and District Plan level.

3.3 Regional Focus Areas

Submission:

- Foodstuffs **opposes in part** Policy 58.

These provisions are important for Foodstuffs as Foodstuffs has a strong presence within the identified 'Regional Focus Areas'.

Method 45 aims to develop planning frameworks for each Regional Focus Area to achieve Policy 58. Foodstuffs seeks further clarity regarding these focus areas, and requests input and participation in the formation of planning frameworks as an important stakeholder within these 'regional focus areas' where appropriate.

Method 4 assists in the implementation of Policy 58 through ensuring that 'Focus Areas' and the associated goals for these areas become a regulatory consideration in future resource consents, plan changes and any notice of requirements. However, the current goals in the WRS are not clear and require further clarification to ensure they can provide robust direction.

Foodstuffs seek the following decision from Council:

Foodstuffs **requests** that the goals of Policy 58 is deleted from the RPS unless the goals of the focus areas are revised to ensure they provide clear guidance on how these focus areas should be managed;

Foodstuffs **requests** involvement in the framework formulation for each of the Regional Focus Areas' as outlined in Method 45.

3.4 Protection of Industry-based locations

Submission:

- Foodstuffs **oppose** Policy 31 and associated Method 43.

Policy 31 and the corresponding Method 43 may restrict commercial activities from locating within industrially-based locations.

This has implications for Foodstuffs for two reasons. Firstly, this may create considerable development pressure on the identified centres and focus areas (described within Policies 29 & 58), which may increase the difficulty for Foodstuffs to locate new stores within significant centres or focus areas. Secondly, these provisions are also likely to increase the difficulty for Foodstuffs to locate stores outside of regionally significant centres on industrial zoned land, where in some cases this may be appropriate for a large supermarket.

Foodstuffs seek the following decision from Council:

Foodstuffs **requests** that Policy 31 and associated Method 43 are deleted from the proposed RPS.