

S050484c19

22nd September 2006

Wellington City Council
District Plan Policy
P.O Box 2199
WELLINGTON

ATTN: Brett McKay

Dear Brett

Re: Request for Plan Change - Takapu Island, Tawa – Further Information

We are writing in response to your letter dated the 7th August 2006 where you have requested further information with respect to the plan change submitted to Council in July this year. There are two matters on which you have requested further information.

The first of these relates primarily to Council officers concerns that the site could potentially become a retail centre under the suburban centre rules. Council officers appear to have a concern that this could potentially have effects the viability of established retail areas within the city. In particular you have asked for information on the impact on the surrounding area of big box retail activity and how those effects might be mitigated.

The other concern outlined in your letter, is that Council wish to ensure that the site is not developed in an ad hoc or piecemeal fashion. We intend on responding to each of these matters in turn.

Retail Activity

The proposal to rezone to suburban centre is intended to allow a range of commercial, or industrial or residential uses on the site as of right. The land, as outlined in the information submitted in the request for plan change, is not primarily suited to “outer” residential development. The densities of development “permitted” under the Outer Residential zone are the lowest in the Wellington City area. A suggestion has been made that a retirement village is an option for development on the site. This was discussed with the owners who have indicated that this type of development suffers from the same inherent issues as any residential use.

It was understood from the consultation with officers leading up to the lodging of the request for a plan change, that Council were looking for a mixed use for the site that was likely to include some residential. In meetings with Council officers subsequent to the lodging of the request for a plan change, it was indicated that a residential use of the site was not an imperative. It was indicated that future proposals with no residential component, would still be acceptable in terms of Council’s wider strategic outcomes including the Northern Growth Management Framework (NGMF).

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The request for further information specifically raised Council officer concerns over retail use on the site. The use of the site for retail activity (in particular big box retail) was not an imperative outcome of the rezoning proposal. While flexibility in the potential future uses of the land is an advantage in terms of commercial value, the owners of the site are prepared to modify the plan change proposal to address the effects raised in relation to future retail and in particular, big box retail activity.

Adjacent Land District Plan Change

District Plan Change (DPC) 45 relates to land in the vicinity of the subject site, including Stebbings Valley and Lincolnshire Farm. DPC 45 was only recently notified by Wellington City Council. DPC involved the replacement of the existing Suburban Centre Area (Appendix 7) rules that are currently operative and within the Lincolnshire Farm Area.

DPC 45 has introduced the concept of an “Urban Development Area” (UDA). This concept works in conjunction with a specific structure plan for the area. The UDA is effectively an ‘all zone, all uses’ area. Land use and building development is to be controlled by the proposed structure plan. It does introduce a restriction on retail uses via standards and terms within relevant rules. The relevant rule in this case, is 28.3.4. The standards and terms of that rule states:

“In employment areas, any retail activities must be ancillary to the primary activity on the site or not exceed 500m² of GFA.”

Council’s Relevant Retail Planning Documents – Fragmentation

You have stated in your letter that the Council’s Retail Strategy, Urban Development Strategy (UDS) and Wellington Regional Strategy (WRS) supports the consolidation of significant new retail in suburban areas and areas adjacent to established suburban centres.

You have also stated that Council officers are concerned that large format, or big box retail areas could be established on this site which is outside an established commercial centre.

The Retail Strategy Document discusses the retail areas in Downtown Wellington, Downtown Wellington Fringe and Suburban areas. Fragmentation of retail centres is specifically discussed in section 5.2.2 (Downtown Fringe) and states:

“Most significantly, there is a risk that large format retailers will locate wherever sites can be secured, even though they prefer to locate close to an existing shopping base. Large format retailers are already investigation possible locations in out-of-centre sites away from existing retail centres. The main implication of this is the increased fragmentation of the retail network and the associated problems of accessibility and the impact of increased traffic generation.”

The issues specifically raised are fragmentation of retail activity, access and increased traffic generation. The Takapu Island site is not within the Downtown Fringe. It is also geographically separated from Wellington City downtown areas. It is closer to the Porirua “shopping destination” areas. The Council in its Retail Strategy document recognises that the advantages of facilitation of big box retail in the CBD fringe is “less drive time to other regional centres.”

This site (if it were to become a retail site) would potentially not compete with Wellington CBD fringe areas. It is located (in terms of travelling times) more or less equidistantly between Porirua and Johnsonville centres. One of the advantages of locating retail/employment in this area is the reduced travelling times between the other more distant centres in Johnsonville and in particular Porirua. Such a reduction in travelling times for the soon to be developed Lincolnshire farm

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growth areas, must be a more positive and sustainable use of land resources than requiring such centres to be located a large distance from the existing Tawa and the proposed Lincolnshire Farm communities.

I note in your letter that Council are of the opinion that “destination” shopping on this site would be “*totally dependant on customers arriving by car.*” Certainly, the implication that this site is not well connected is simply untrue. The site has a number of advantages in terms of its transport links.

The proximity of the development to the Takapu Railway station would clearly enable shoppers/workers to travel to the site by rail.

It is also in close proximity to existing and proposed “park and ride” facilities which have been an important element of the future development of the site. While park and ride facilities involve car transport, the location of some retail facilities in this location, would potentially result in a reduction of vehicle movements. For example, commuters using the park and ride facilities may incorporate shopping activity prior to or after connecting with train transport to the CBD.

Provision has been made in the site access for bicycle and pedestrian links. The modifications to the road access on Takapu Road submitted with the plan change information are much more pedestrian and bicycle friendly than the existing roading environment.

Furthermore, there would be no impediment to the development of road public transportation options, such as buses, into and adjacent to the site. The slowing of motorway traffic via the new roundabout would facilitate a bus stop immediately adjacent the site, thereby enabling connection to the railway station. The site is located on one of the links to the future Lincolnshire farm development (Takapu Road). It is therefore almost a certainty that in future, bus links will be developed between Lincolnshire Farm and the Takapu railway station.

Takapu Island Plan Change

In Council’s request for further information, the concerns expressed relate specifically to “big box retail”. A definition of big box retail is provided. Typically, we understand that retail areas required for big box retail need floor areas of significantly larger areas than the 500m² trigger set out in DPC 45 provisions. Typically, large format retailing requires an area of well in excess of 2000m². It is understood that the floor area for a small supermarket such as the Willis Street New World is around 1500m².

No specific activities have at this stage been identified for the site. It is however intended that there be flexibility to respond to demands from a range of future users.

However, in response to Council’s request for further information, it is intended to “narrow” the extent of retail activity “permitted” on the site by the proposed new rules relating to the subject site.

A modification to the suburban centre appendix 8 rules is proposed. The modified rules are attached to the letter. Generally, it is proposed to have a limitation of total floor area for retail on each site within the Takapu Island development area.

The limitation of retail to relatively low gross floor levels, will ensure that the big box retail cannot be established on the site without the wider effects being considered under a resource consent application. The limitation on floor area will however allow mixed use activity, where some retail is associated with other activity on site, or is relatively small in total area.

A provision limiting retail on this site to 1000m² will ensure that there are no adverse effects as a result of the proposed plan change with respect to the creation of new retail areas or alternatively the creation of new “destination” retail zones in the Tawa area.

We note that the traffic report submitted with the application has already assessed the full range of activity (including retail) that could potentially be undertaken on this site. The limitation of retail by the restriction on total floor area would be consistent with the that report and the effects already taken into consideration.

The Development Concept

Since the lodgement of the plan change application, the development concept for the site has been refined. It is now proposed to carry out a subdivision of the site, under resource consent, more or less in parallel with the plan change process.

Council’s expressed concern that the land may be developed in an ad hoc or piecemeal manner has largely been addressed by this proposed subdivision. A detailed topographic plan has also been completed and the earthworks design plan has been refined from this accurate on site information.

It is intended to lodge the earthworks plan in the very near future for resource consent. The subdivision will follow on after the notification of the plan change. The subdivision, earthworks and landscape plans are all attached and is numbered S050484-20/A.

The attached plan is very similar to the earthworks plan in the original request, however it has been refined to the point where there is effectively a “cut to fill balance”. The amount of cut is expected to be of the order of 110,000m².

The subdivision of course, could easily accommodate residential development under the existing zoning, however it has been acknowledged that the subdivision has been designed specifically for mixed use purposes. If residential development be undertaken, it would be more appropriate for a specific residential layout to be designed. For that reason, the subdivision consent is being delayed until the plan change is notified and submissions from the general public received.

As outlined above, the final use on the site has yet to be determined, however it is likely that it will be commercial or industrial use. “Live and work” units are also being considered as a development option.

Conclusions

In support of the information response outlined above, we provide the following attachments:

- Amended Rules for the Suburban Centre Rules – Amendments to original request highlighted yellow.
- Amended S32 Analysis regarding changes to the rules relating to retail activity.
- A proposed earthworks plan for the site by **Spencer Holmes Ltd** numbered **S05-0484-20/A**

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- A proposed subdivision plan for the site by **Spencer Holmes Ltd** numbered **S05-0484-21/A**
- A proposed landscape concept plan for the subdivision and earthworks by **Isthmus Landscape Architects E0-01**.

The provision of these amendments will now we understand, allow Council to proceed with the public notification of the plan change proposal. The site owners would greatly appreciate Council's most expedient action.

Yours faithfully
Spencer Holmes Limited

Ian Leary
Associate - Planning

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CC: Takapu Island Developments Ltd