

Summary of Submissions
Proposed District
Plan Change 52 -

Suburban Centre
Rule Amendments

Proposed District Plan Change 52 Suburban Centre Rule Amendments

Summary of Submissions

Submission Number	Name	Address for Service	Wishes to be heard
1	Takapu Island Developments Ltd	C/- Spencer Holmes Ltd Level 6, 8 Willis Street PO Box 588 Wellington Attn: Ian Leary	Yes

The submitter has recently lodged a private plan change request with Council that resulted in Proposed District Plan Change 47 (DPC47). As the submitter believes this plan change is inconsistent with Plan Change 52 (DPC52), they propose that any changes made to the suburban centre rules under DPC 47 will need to be reflected in the changes made under DPC52, depending on timings of decisions and any appeals on both changes. The submitter also cites a deficiency in the section 32 analysis, stating that there is no recognition of current retailing areas and suburban centre activity occurring adjacent to the main centres in the plan change.

Further, the submission generally relates to all of the proposed amendments under DPC52. Specific support or opposition to the proposed provisions of the plan change are outlined below under the decision requested. Where specific text or provisions of DPC52 are not discussed, submitter is either neutral or supports the proposed provisions of the plan change.

Decision Requested:

That the plan change be adopted pursuant to the general comments made above and amendments proposed below:

- amend the definition of retail activity to remove the word "services;"
- add a bullet point to the definition of retail activity to read, "warehouses (whether associated with retail activity or not), timber yards, and garden supplies;"
- revise the provisions under rules 7.1.1, 7.1.2, 7.3.1 & 7.3.2 to reflect the corresponding provisions laid out by DPC47 – this is to ensure consistency between the two plan changes.

2	ING Property Trust No.1 Ltd	C/-Spencer Holmes Ltd Level 6, 8 Willis Street PO Box 588 Wellington	Yes
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General

Submitter rejects attempts to restrict and control current or future retail activity, particularly on sites along the Hutt Road where retail has been a long-standing activity.

Decision Requested:

That the Council reject those rules controlling retailing at 180-208 Hutt Road.

3.10

Amend and add to the definition – Retail Activities (for the purpose of suburban centres)

Decision Requested:

Change the definition of Retail Activities as follows:

- remove the word “services;”
- add a bullet point to read, “warehouses (whether associated with retail activity or not), timber yards, and garden supplies;”

7.1.1

Submitter opposes the addition to the Rule 7.1.1, controlling retail activities over 500m² gfa.

Decision Requested:

That the following words be deleted from Rule 7.1.1:

..provided that it complies with the following conditions:

...

7.1.1.10 Gross floor area of retail activities outside identified Suburban Centre areas

7.1.1.10.1 The maximum gross floor areas that any retail activity may occupy is 500m². This condition does not apply to retail activities located within the Suburban Centre areas identified below:

A limitation on the scale of retail activities has been imposed to provide for the assessment of larger activities proposed for sites outside the main retail centres. The Council is concerned to maintain a compact urban form, sustainable transport systems, the viability of existing centres, and their continuation as the hub of community activity.

7.1.2

Submitter does not generally oppose provisions of DPC 52 which require the consideration of design and external appearance on new buildings or additions and alterations over 500m² - but is concerned that the wording of 7.1.2.7.1 implies that the whole of an existing building which exceeds 500m² in area, could be required to be potentially redesigned if small external modifications were made to the building.

Decision Requested:

That 7.1.2.7.1 be amended to read:

The gross floor area of any *new* building must not exceed 500 m² *or where an existing building already exceeds 500m² any additions and alterations which alter the footprint of the building by more than 100m²*. This condition does not apply to any addition or alteration that is not from a visible public space.

7.3.1

ING (NZ) does not support the imposition of restrictions on retailing on their Hutt Road premises. Furthermore, the matters required to be addressed under the standards and terms are such that any assessment will be totally subjective in its interpretation.

Decision Requested:

That the following be deleted from the Rule 7.3.1:

7.3.1.7 Gross floor area of retail activities

...

In respect of 7.3.1.7A Council's discretion is restricted to the matters that must be addressed in the report required under the standards and terms under this rule

...

An application for resource consent for a retail activity that occupies a gross floor area exceeding 500m², must supply a report that addresses:

- the extent to which the retail activity avoids any adverse effect on the overall vitality and viability of existing retail centres
- the extent to which the activity promotes the efficient use of resources and compact urban form
- the extent to which the activity affects existing public investment and minimises the need for additional public investment in infrastructure and public spaces
- how the activity promotes accessibility, enables sustainable transport choices (including public transport), and minimises trip generation through the co-location of similar activities.

7.3.2

The submitter requests amendments to Rule 7.3.2 to maintain consistency with the submission to Rule 7.1.2

Decision Requested:

That in the first paragraph of the standards and terms, the following words be included after the words " floor area of 500m²:

..or where an existing building already exceeds 500m² any additions and alterations which alter the footprint of the building by more than 100m².

Section 32 Report

Submitter feels the report is deficient in failing to recognise that there are significant suburban centres areas outside of town centres.

Decision Requested:

That the Section 32 Report discuss or consider this issue.

3	Bunnings Limited	C/- Barker & Associates Ltd PO Box 37806 Parnell Auckland	Yes
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3.10

Submitter opposes the proposed definition for retail activities in Suburban Centres.

Decision Requested:

Add a third bullet point under the proposed definition for Retail Activity to ensure that Building Improvement Centres are excluded from the definition provided for Retail Activity as follows:

Building improvement centres meaning premises used for the storage, display, and sale of goods and materials used in the construction, repair, alteration, and renovation of buildings and includes builders supply and plumbing centres and home and building display centres.

7.1.2.7

The intent behind this rule is supported in that the rule encourages or directs good quality urban design outcomes for new buildings and developments. However, the proposed rule and its supporting assessment criteria do not recognise that within certain areas of a city, for example an area compromised of heavy industrial-type activities, new buildings do not require the same level of urban design input.

Decision Requested:

That rule 7.1.2.7 be amended as underlined below:

7.1.2.7 *Gross floor area (design controls for retail activities)*

7.1.2.7.1 *The gross floor area of any retail building must not exceed 500m². This condition does not apply to any addition or alteration that is not visible from a public space.*

A limitation has been imposed on the gross floor area of buildings to provide for the design assessment of larger developments. The Council seeks to promote retail buildings and retail building modifications with design qualities...

7.3.2.5A

Submitter seeks amendment to this rule to maintain consistency with the submission for rule 7.1.2.7

Decision Requested:

In 7.3.2.5A, after the words "design controls," add the words "for retail activities," and that in the first line of standards and terms, after the words "consent for any," include the words "retail activity."

4	Kiwi Income Property Trust	C/- Barker & Associates Ltd Level 2, 128 Parnell Road Auckland	Yes
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General

Submitter does not oppose Plan Change 52 provided it is refined in accordance with the specific provisions provided.

Decision Requested:

In the event of the changes sought in the specific submissions not being adopted, it is requested that the plan change be withdrawn.

6.2.1

Proposed Plan Change 52 does not propose any new objectives and policies, nor does it propose to amend any of the listed objectives and policies contained in section 6.2 Suburban Centre Objectives. Although there is some support within Objective 6.2.1 for proposed rule 7.1.1.10.1 which seeks to manage retail activity outside of existing defined centres, the objective and policy framework fails to clearly express those matters relevant under the Resource Management Act 1991 associated with the redistribution of retail activity. In this respect, the proposed plan change would benefit from the insertion of a new objective and policy specifically addressing the potential loss of vitality, amenity, or viability as a consequence of the redistribution of retail activities to out-of-centre locations.

Decision Requested:

That a new objective 6.2.1A and a new policy 6.2.1.1A be included as follows:

6.2.1A

To ensure that activities establishing within Suburban Centre areas do not compromise the function of existing centres in the region through loss of vitality, amenity, or viability as a consequence of the redistribution of retail activities.

6.2.1.1A

To avoid the consequential loss of vitality and amenity on existing centres in the region due to a redistribution of retail activities. Activities shall not result in significant adverse consequential effects on the social, economic, and cultural well-being of the community served by that centre.

3.10, 7.1.1.10, & 7.3.1.7A

The proposed standards and terms set out in proposed rule 7.1.1.10 without amendments as set out in the relief below may result in unanticipated adverse effect, contrary to the intent of Plan Change 52. This provision for retailing within historic industrial areas is significant, effectively allowing buildings and sites to be entirely developed for retail activity, potentially resulting in a large conglomeration of retailing within the industrial areas. This requires amendments to rule 7.1.1.10 to avoid the potential for buildings and sited to be entirely occupied for retail activity (with the exception of trade related retailing) and to ensure that any retailing activity will not conflict with the industrial purpose of such areas.

Decision Requested:

- That the definition of Retail Activity be amended by the addition of a further bullet point to exclude "Trade Suppliers."
- That a definition of "Trade Suppliers" be included as follows:

Trade Supplier – means a business engaged in sales to businesses and institutional customers and may also include a proportion of its sales to the general public, and wholly consists of suppliers of goods in one or more of the following categories:

- Automotive and marine suppliers
- Building Suppliers
- Catering equipment suppliers
- Farming and agricultural suppliers
- Garden and patio suppliers

- That rule 7.1.1.10.1 be amended as follows:
 Except as limited by rule 7.3.1.7B, retail activities located within the Suburban Centres areas shall comply with the following:
 - The total area of indoor and outdoor space used for the display and retailing of goods manufactured or repaired on-site shall be a maximum of 25% of the total gross floor area used to manufacture or repair such goods.
 - The total area of indoor and outdoor space used for other retailing activities shall be a maximum of 350m² per site or 25% of the total gross floor area, whichever is lesser.
 This rule does not apply to retail activities located within the suburban centre area identified below.
- That rule 7.3.1.7A be amended to read:
 Gross floor area of retail activities provided;
 - A single tenancy or group of tenancies on a site do not exceed 2000m² of gross floor area.
- That a new rule 7.3.1.7A be included as follows:
 Notwithstanding compliance with rule 7.1.1.10.1.2 or rule 7.3.1.7A the cumulative gross floor area of any:
 - Proposed retail activity; plus
 - Any other existing or approved retail activity of which some part of the site is located within 200 metres of any part of the proposed development site
 shall be limited to a maximum of 3000m².
 This rule does not apply to retail activities located within Suburban Centre area identified above.
- Include clarification that any activity failing to comply with rule 7.3.1.7A or rule 7.3.17B is non-complying.

5	Prime Property Group	C/- Dave Armour 8 John Street Titahi Bay	Yes
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Submitter opposes the plan change in its entirety. They believe that the subjective nature of urban design issues means that there is often considerable debate regarding appropriate design, and considerable potential for delays in processing resource consent applications. In terms of bulk and scale of buildings, and potential effects upon adjoining properties, a threshold of 500m² for new buildings is considered to be too low. Applying the multi unit design guide to future residential developments within Suburban Centres is not considered appropriate given the nature of such centres.

Decision Requested:

That proposed Plan Change 52 not be approved – or, that the plan change be amended as follows:

- that the change to permitted activity standard 7.1.1.10.1 is amended so that maximum gross floor area that any retail activity may occupy be increased to 1000m²;
- that proposed change to Suburban Centre Permitted Activity Standard 7.1.2.7.1 is amended so that the gross floor areas of any building must not exceed/be increased to 1000 m²;
- that the proposed change to rule 7.3.1.7A be amended in relation to the matters to be addressed in a report being restricted to:
 - The extent to which the retail activity avoids any adverse effect on the overall vitality and viability of existing retail centres; and
- that the proposed change to 7.3.2.5A be restricted to:
 - The extent to which the building is designed to respond appropriately to its context.

6	Wellington International Airport Ltd	C/- Morrison Kent 105 The Terrace PO Box 10-035 Wellington	Yes
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<p>The submitter supports the Proposed Plan Change – in particular, that the proposed amendments will:</p> <ul style="list-style-type: none"> • provide greater control over the quality of development & urban design in suburban centres; • reduce the potential of adverse effects of new buildings on the surrounding environment; • foster a cohesive retail network; • support compact urban form and viability of existing retail centres; • promote sustainable management of natural and physical resources; • enhance the amenity values of suburban centres; • promote development of safe and healthy city; and • maintain & enhance the physical character & streetscape of suburban centres <p>Decision Requested:</p> <p>That the Council amend the Suburban Centre Rules as proposed in Proposed District Plan Change 52.</p>			
7	Ettamogah Properties Ltd	C/-Connell Wagner Ltd 102 Custom House Quay PO Box 1591 Wellington	Yes
<p>Submitter opposes the plan change as it adds additional costs and burdens to development within the suburban centres. Specifically, the submitter opposes the 500m² size requirements, the retail assessment requirement, design assessment requirement, and the definition of 'retail activities' as proposed in the plan change.</p> <p>Decision Requested:</p> <p>That the Council:</p> <ul style="list-style-type: none"> • revise the definition of retail activities so that it does not include activities that are not retail in nature, such as storage facilities and industrial land uses; • revise the standards and terms to better define the urban design matters, reflect effects that re within the control of the applicant and not contradict the Act's intent of no consideration of trade competition in resource consent decision making. Furthermore, the standards and terms should be written in a manner that reduces their subjectiveness; and • revise the threshold of 500m² so that it does not burden activities that require large areas but are not retail in nature, such as storage facilities and industry. 			
8	Wundarra Properties Ltd	C/-Connell Wagner Ltd 102 Custom House Quay PO Box 1591 Wellington	Yes
<p>Submitter opposes the plan change as it adds additional costs and burdens to development within the suburban centres. Specifically, the submitter opposes the 500m² size requirements, the retail assessment requirement, design assessment requirement, and the definition of 'retail activities' as proposed in the plan change.</p> <p>Decision Requested:</p> <p>That the Council:</p> <ul style="list-style-type: none"> • revise the definition of retail activities so that it does not include activities that are not retail in nature, such as storage facilities and industrial land uses; • revise the standards and terms to better define the urban design matters, reflect effects that re within the control of the applicant and not contradict the Act's intent of no consideration of trade competition in resource consent decision making. Furthermore, the standards and terms should be written in a manner that reduces their subjectiveness; and • revise the threshold of 500m² so that it does not burden activities that require large areas but are not retail in nature, such as storage facilities and industry. 			
9	Orpheus Properties Ltd	C/-Connell Wagner Ltd	Yes

		102 Custom House Quay PO Box 1591 Wellington	
<p>Submitter opposes the plan change as it adds additional costs and burdens to development within the suburban centres. Specifically, the submitter opposes the 500m² size requirements, the retail assessment requirement, design assessment requirement, and the definition of 'retail activities' as proposed in the plan change.</p> <p>Decision Requested:</p> <p>That the Council:</p> <ul style="list-style-type: none"> • revise the definition of retail activities so that it does not include activities that are not retail in nature, such as storage facilities and industrial land uses; • revise the standards and terms to better define the urban design matters, reflect effects that re within the control of the applicant and not contradict the Act's intent of no consideration of trade competition in resource consent decision making. Furthermore, the standards and terms should be written in a manner that reduces their subjectiveness; and • revise the threshold of 500m² so that it does not burden activities that require large areas but are not retail in nature, such as storage facilities and industry. 			
10	Pymurra Properties Ltd	C/-Connell Wagner Ltd 102 Custom House Quay PO Box 1591 Wellington	Yes
<p>Submitter opposes the plan change as it adds additional costs and burdens to development within the suburban centres. Specifically, the submitter opposes the 500m² size requirements, the retail assessment requirement, design assessment requirement, and the definition of 'retail activities' as proposed in the plan change.</p> <p>Decision Requested:</p> <p>That the Council:</p> <ul style="list-style-type: none"> • revise the definition of retail activities so that it does not include activities that are not retail in nature, such as storage facilities and industrial land uses; • revise the standards and terms to better define the urban design matters, reflect effects that re within the control of the applicant and not contradict the Act's intent of no consideration of trade competition in resource consent decision making. Furthermore, the standards and terms should be written in a manner that reduces their subjectiveness; and • revise the threshold of 500m² so that it does not burden activities that require large areas but are not retail in nature, such as storage facilities and industry. 			
11	Magnetic Properties Ltd	C/-Connell Wagner Ltd 102 Custom House Quay PO Box 1591 Wellington	Yes
<p>Submitter opposes the plan change as it adds additional costs and burdens to development within the suburban centres. Specifically, the submitter opposes the 500m² size requirements, the retail assessment requirement, design assessment requirement, and the definition of 'retail activities' as proposed in the plan change.</p> <p>Decision Requested:</p> <p>That the Council:</p> <ul style="list-style-type: none"> • revise the definition of retail activities so that it does not include activities that are not retail in nature, such as storage facilities and industrial land uses; • revise the standards and terms to better define the urban design matters, reflect effects that re within the control of the applicant and not contradict the Act's intent of no consideration of trade competition in resource consent decision making. Furthermore, the standards and terms should be written in a manner that reduces their 			

<p>subjectiveness; and</p> <ul style="list-style-type: none"> • revise the threshold of 500m² so that it does not burden activities that require large areas but are not retail in nature, such as storage facilities and industry. 			
12	Hutt Road Trust No. 2	C/-Connell Wagner Ltd 102 Custom House Quay PO Box 1591 Wellington	Yes
<p>Submitter opposes the plan change as it adds additional costs and burdens to development within the suburban centres. Specifically, the submitter opposes the 500m² size requirements, the retail assessment requirement, design assessment requirement, and the definition of 'retail activities' as proposed in the plan change.</p> <p>Decision Requested:</p> <p>That the Council:</p> <ul style="list-style-type: none"> • revise the definition of retail activities so that it does not include activities that are not retail in nature, such as storage facilities and industrial land uses; • revise the standards and terms to better define the urban design matters, reflect effects that re within the control of the applicant and not contradict the Act's intent of no consideration of trade competition in resource consent decision making. Furthermore, the standards and terms should be written in a manner that reduces their subjectiveness; and • revise the threshold of 500m² so that it does not burden activities that require large areas but are not retail in nature, such as storage facilities and industry. 			
13	Hutt Road Trust	C/-Connell Wagner Ltd 102 Custom House Quay PO Box 1591 Wellington	Yes
<p>Submitter opposes the plan change as it adds additional costs and burdens to development within the suburban centres. Specifically, the submitter opposes the 500m² size requirements, the retail assessment requirement, design assessment requirement, and the definition of 'retail activities' as proposed in the plan change.</p> <p>Decision Requested:</p> <p>That the Council:</p> <ul style="list-style-type: none"> • revise the definition of retail activities so that it does not include activities that are not retail in nature, such as storage facilities and industrial land uses; • revise the standards and terms to better define the urban design matters, reflect effects that re within the control of the applicant and not contradict the Act's intent of no consideration of trade competition in resource consent decision making. Furthermore, the standards and terms should be written in a manner that reduces their subjectiveness; and • revise the threshold of 500m² so that it does not burden activities that require large areas but are not retail in nature, such as storage facilities and industry. 			
14	Armstrong Jones Management Ltd	C/- Prime Retail Management Ltd PO Box 4132 Auckland 1020	Yes
<p>Submitter suggests amendments to a number of provisions as cited in the decision requested. In the event that relief in general accordance with the provisions specified below is not granted, then the submitter would oppose the plan change.</p> <p>Decision Requested:</p> <ul style="list-style-type: none"> • That the planning maps defining the existing Suburban Centre areas at rule 7.1.1.10.1 of proposed Plan Change 52 be modified to include the Dress Smart site or an additional map be inserted to depict the Dress Smart site. • That proposed rule 7.2.7.1 be amended by inserting the following: 			

	<ul style="list-style-type: none"> - <i>The gross floor area of any building must not exceed 500m². This condition does not apply to any addition or alteration that is not visible from a public place. Further, in terms of additions/extensions to existing buildings, this rule recognises that additions/extensions to existing buildings will only need to have regard to the intent of the specified Standards and terms rather than requiring a specific design statement to be submitted.</i> • That an additional bullet point be added to the "Standards and Terms" after the last bullet point that commences "the extent to which principles for crime prevention through..." which states as follows: <ul style="list-style-type: none"> - <i>"Any application seeking to undertake additions and extensions to an existing building shall only have regard to the intent of the above assessment criteria. While no specific design statement is required to demonstrate compliance with the assessment criteria, the proposal will need to be cognisant of the intent behind the assessment criteria and will be required to demonstrate how any additions/extensions dovetail with the existing building/development on site."</i> 		
15	Foodstuffs (Wellington) Co-operative Society Ltd	C/- Gillespie Young Watson PO Box 30940 Lower Hutt	Yes
<p>Submitter is in opposition to the changes proposed by Plan Change 52 as they will adversely impact on Foodstuff's ability to respond to changing market situations. Additionally, the Section 32 report fails to establish any reasonable basis for the additional controls (costs/benefits) proposed by the plan change.</p> <p>Decision Requested:</p> <p>That Council:</p> <ul style="list-style-type: none"> • Reject all of Plan Change 52 • If the plan change is not rejected, exclude supermarkets/food warehouses and liquor outlets from proposed Rule 7.1.1.10 and the requirement to prepare a retail impact assessment for those types of retail activities seeking to establish in Suburban Centre Area outside of those identified in Rule 7.1.1.10.1 • If Plan Change 52 is not rejected, change the status of proposed Rule 7.3.2.5A from a discretionary activity (restricted) to a controlled activity. 			
16	Capital & Coast District Health Board	Private Bag 7902 Wellington	Yes
<p>Submitter opposes the proposed plan change. C & CDHB owns property in Newtown Suburban Centre, and feels that the proposed changes will introduce additional compliance costs and uncertainty and adversely affect C&CDHB's ability to develop its property in the Newtown Suburban Centre Area for "health services" and related activities.</p> <p>Further, the Newtown Suburban Centre Area is already subject to design and external appearance controls as a controlled activity (operative Rule 7.2.1). The further design based control as a discretionary activity, as proposed, is unnecessary and unreasonable.</p> <p>Finally, the submitter states that the Section 32 fails to establish any reasonable basis for the additional restricted discretionary design control proposed by Plan Change 52.</p> <p>Decision Requested:</p> <p>That Council either:</p> <ul style="list-style-type: none"> • rejects all of District Plan Change 52; or • if not rejected, change the status of proposed Rule 7.3.2.5A from a discretionary activity to a controlled activity. 			
17	Dominion Foundation Property Fund Ltd	C/- Dominion Funds Ltd Level 9, 99-105 Customhouse Quay PO Box 2879 Wellington	Yes
<p>Submitter is in opposition to the proposed change as it will adversely impact on DFP Fund's ability to respond to changing market situations and the future role of the Churchill Drive Shopping Centre in the context of changing market situations. Additionally, the section 32 report fails to establish any reasonable basis for the additional controls proposed by Plan Change 52.</p> <p>Decision Requested:</p>			

<p>That Council either:</p> <ul style="list-style-type: none"> • rejects all of Plan Change 52; or • if the proposal is not rejected, include the Churchill Drive Shopping Centre as a centre (under Rule 7.1.1.10.1) where the 500m² condition specified in proposed Rule 7.1.1.10 does not apply; and • change the status of proposed Rule 7.3.2.5A from discretionary to controlled. 			
17A	Dominion Retail Property Fund Ltd	C/- Dominion Funds Ltd Level 9, 99-105 Customhouse Quay PO Box 2879 Wellington	Yes
<p>Submitter is in opposition to the proposed change as it will adversely impact on DRP Fund's ability to respond to changing market situations and the future role of the Johnsonville Shopping Centre in the context of changing market situations. Additionally, the section 32 report fails to establish any reasonable basis for the additional controls proposed by Plan Change 52.</p> <p>Decision Requested:</p> <p>That Council either:</p> <ul style="list-style-type: none"> • rejects all of Plan Change 52; or • change the status of proposed Rule 7.3.2.5A from discretionary to controlled. 			
18	Rongotai Investments	C/- Wareham Cameron Co Ltd 31 Waring Taylor Street PO Box 3531 Wellington	Yes
<p>Submitter is in opposition to the proposed change as it will adversely impact on Rongotai Investments' ability to respond to changing market situations and the future role of the Rongotai Suburban Shopping Centre in the context of changing market situations. Additionally, the section 32 report fails to establish any reasonable basis for the additional controls proposed by Plan Change 52.</p> <p>Decision Requested:</p> <p>That Council either:</p> <ul style="list-style-type: none"> • rejects all of Plan Change 52; or • if the proposal is not rejected, include the Rongotai Suburban Centre as a centre (under Rule 7.1.1.10.1) where the 500m² condition specified in proposed Rule 7.1.1.10 does not apply; and • change the status of proposed Rule 7.3.2.5A from discretionary to controlled. 			
19	Goldsborough Property Investments Limited	PO Box 9764 Wellington	Yes
<p>Submitter strongly opposes Proposed Plan Change 52 regarding design controls on buildings with gross floor area (gfa) exceeding 500m² and limitation of the gfa of retail activities to 500m² within suburban centre zones.</p> <p>The submitter believes that the Council should provide higher quality infrastructure to many existing suburban centres, rather than telling developers how to provide premises that meet their tenants' needs</p> <p>Decision Requested:</p> <p>That the Council disregard Proposed District Plan Change 52, and concentrate on providing high quality infrastructure to aid developers.</p>			
20	Garden Shed Holdings Ltd	PO Box 9764 Wellington	Yes
<p>Submitter strongly opposes Proposed Plan Change 52 regarding design controls on buildings with gross floor area (gfa) exceeding 500m² and limitation of the gfa of retail activities to 500m² within suburban centre zones.</p> <p>The submitter believes that the Council should provide higher quality infrastructure to many existing suburban centres, rather than telling developers how to provide premises that meet their tenants' needs</p>			

Decision Requested:			
That the Council disregard Proposed District Plan Change 52, and concentrate on providing high quality infrastructure to aid developers.			
21	Stafford Property Investments Ltd	PO Box 9764 Wellington	Yes
<p>Submitter strongly opposes Proposed Plan Change 52 regarding design controls on buildings with gross floor area (gfa) exceeding 500m² and limitation of the gfa of retail activities to 500m² within suburban centre zones.</p> <p>The submitter believes that the Council should provide higher quality infrastructure to many existing suburban centres, rather than telling developers how to provide premises that meet their tenants' needs</p> <p>Decision Requested:</p> <p>That the Council disregard Proposed District Plan Change 52, and concentrate on providing high quality infrastructure to aid developers.</p>			
22	Peninsula Investments Ltd	PO Box 9764 Wellington	Yes
<p>Submitter strongly opposes Proposed Plan Change 52 regarding design controls on buildings with gross floor area (gfa) exceeding 500m² and limitation of the gfa of retail activities to 500m² within suburban centre zones.</p> <p>The submitter believes that the Council should provide higher quality infrastructure to many existing suburban centres, rather than telling developers how to provide premises that meet their tenants' needs</p> <p>Decision Requested:</p> <p>That the Council disregard Proposed District Plan Change 52, and concentrate on providing high quality infrastructure to aid developers.</p>			
23	Westland Property Investments Ltd	PO Box 9764 Wellington	Yes
<p>Submitter strongly opposes Proposed Plan Change 52 regarding design controls on buildings with gross floor area (gfa) exceeding 500m² and limitation of the gfa of retail activities to 500m² within suburban centre zones.</p> <p>The submitter believes that the Council should provide higher quality infrastructure to many existing suburban centres, rather than telling developers how to provide premises that meet their tenants' needs</p> <p>Decision Requested:</p> <p>That the Council disregard Proposed District Plan Change 52, and concentrate on providing high quality infrastructure to aid developers.</p>			
24	Ngauranga Property Investments Ltd	PO Box 9764 Wellington	Yes
<p>Submitter strongly opposes Proposed Plan Change 52 regarding design controls on buildings with gross floor area (gfa) exceeding 500m² and limitation of the gfa of retail activities to 500m² within suburban centre zones.</p> <p>The submitter believes that the Council should provide higher quality infrastructure to many existing suburban centres, rather than telling developers how to provide premises that meet their tenants' needs</p> <p>Decision Requested:</p> <p>That the Council disregard Proposed District Plan Change 52, and concentrate on providing high quality infrastructure to aid developers.</p>			
25	Pelican Investments Ltd	PO Box 9764 Wellington	Yes
Submitter strongly opposes Proposed Plan Change 52 regarding design controls on buildings with gross floor area (gfa)			

<p>exceeding 500m² and limitation of the gfa of retail activities to 500m² within suburban centre zones.</p> <p>The submitter believes that the Council should provide higher quality infrastructure to many existing suburban centres, rather than telling developers how to provide premises that meet their tenants' needs</p> <p>Decision Requested:</p> <p>That the Council disregard Proposed District Plan Change 52, and concentrate on providing high quality infrastructure to aid developers.</p>			
26	The Warehouse Ltd	Planning Network Services Ltd 953 New North Road PO Box 77-037 Mt Albert Auckland	Yes
<p>Submitter opposes Proposed District Plan Change 52 because it:</p> <ul style="list-style-type: none"> • will not promote the sustainable management of resources and will not achieve the purpose of the Resource Management Act 1991; • is contrary to Part II and other provisions of the Act; • is not necessary to avoid, remedy, or mitigate adverse effects of large format retail activity; and • does not recognise the operational requirements of large format retail activity. <p>Decision Requested:</p> <p>That the proposed change be withdrawn</p>			
27	Progressive Enterprises Limited	C/- James Gardner-Hopkins Russell McVeagh 48 Shortland Street PO Box 8/DX CX10085 Auckland 1	Yes
<p>Submitter generally supports the plan change as it is consistent with a centres-based strategy that will enable a level of growth and mix of activities supporting appropriate urban form outcomes, the needs and expectations of the community, and the need for growth in the City. Progressive does make one request for amendment with respect to the design control rules suggested by the proposal.</p> <p>Decision Requested:</p> <p>That the Plan Change be adopted insofar as it is consistent with the comments above, and – that the urban design controls be amended to recognise the particular operational characteristics of large format retail activities such as supermarkets.</p>			
28	The Architectural Centre Inc	PO Box 24178 Wellington Attn: Christine McCarthy	No
<p>Submitter supports the plan change as it provides a mechanism that will both assist more intense developments and compact urban form, while demanding a higher understanding of design rules. The Centre feels that all applications with gfa greater than 500m² should require design statements. Further, the submitter believes that this requirement be extended to building applications with gfa in excess of 350m² - and that sites that are rebuilt after demolition comply with the proposed rules as well.</p> <p>To ensure the design assessments are successful in practice, the Architectural Centre suggests that Council impose a high level of scrutiny and peer reviewing to support the assessment process.</p> <p>Decision Requested:</p> <p>That the plan change be supported in accordance with the suggestions proposed above.</p>			