



Resource Management Act 1991
**Submission on a Publicly
Notified Plan Change To
The Whanganui District Plan**

In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003



PC49 - Sub 5
WHANGANUI
DISTRICT COUNCIL
Te Kaunihera a Rohe o Whanganui

TO: Whanganui District Council, PO Box 637, Whanganui

Name: (print in full) Foodsuffs Properties (Wellington) Ltd

This is a submission on Plan Change No. to the Whanganui District Plan. Closing Date:

1. (a) I ~~could~~/could not* gain an advantage in trade competition through this submission. (**please delete one*).

(b) I am/~~am not~~* directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition (**please delete one*).

2. The specific provisions of the proposed plan change that my submission relates to:

Please see attached.

Use additional pages if required

3. My submission is that (*Please state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made. Please give your reasons*):

See attached.

Use additional pages if required

4. I seek the following decision from the Council (*Give clear details stating what amendments you wish to see made to the Plan Change, and your reasons*):

See attached.

Use additional pages if required

5. I **do/do not*** wish to be heard in support of this submission (**please delete one*).

6. If others make a similar submission I **would/would not*** be prepared to consider presenting a joint case with them at any hearing (**please delete one*).

7. Address for service:

Barker and Associates Ltd

PO Box 1986

Shortland Street

Auckland 1140

Attn: Matt Nomell

Signature:

M. Nomell

(Person making submission or person authorised to sign)

on

Day time phone No: 029 850 2780

behalf of person making submission)

23 August 2016

Whanganui District Council
PO Box 637
Whanganui 4540

Via email: Leayne.Huirua@whanganui.govt.nz

Dear Sir / Madam

Re: Proposed Plan Change 49 - Appendix G Town Centre Building Design Guide Review

Introduction

Barker & Associates ('B&A') are authorised agents for Foodstuffs Properties (Wellington) Ltd ('Foodstuffs') who are in receipt of the letter from Whanganui District Council ('the Council') dated 23 July 2016 regarding Proposed Plan Change 49 ('PC 49') and the proposed introduction of Town Centre Building Design Guidelines for the Outer Commercial zone.

Background

Foodstuffs operate two existing supermarkets at 167 Glasgow Street ('Pak n Save') and 374 Victoria Avenue ('New World'). Both of these sites are zoned Outer Commercial under the Whanganui District Plan and are located within the 'Outer Commercial Design Guideline Overlay' in the Proposed PC 49 Whanganui District Planning Maps.

For this reason, Foodstuffs has a greater interest than the general public on the development, implementation and outcome of the PC 49 design guidelines. We also record that Foodstuffs provided written feedback to the Council on the Town Centre Building Design Guidelines (Outer Commercial) discussion documents when they were first publicly notified in February 2016 and referenced as proposed Plan Change 50.

This letter serves as a submission from Foodstuffs to the overall purpose and content of PC 49. In preparing this submission, the following information has been reviewed:

- Section 32 Report - Proposed Plan Change 49 (Town Centre & Outer Commercial Design Guidelines)
- Appendix 1 Maps Proposed Plan Change 49
- Appendix G2 Outer Commercial Guidelines
- Proposed Changes to Plan Text

Generally, Foodstuffs is supportive of the concept of design guidelines where they are appropriate to the context of a site to which they are applied and consistent with anticipated outcomes of the built

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form provided for in the underlying zoning. However, in this case, it is considered that there is no need for the design guideline overlay to apply to the two supermarket sites. We clarify as follows.

Design Guideline Overlay

As mentioned, both the New World and Pak N Save sites are located within the 'Outer Commercial Design Guideline Overlay'. The intent of the overlay is one of ensuring *"quality building design outcomes ... with buildings exhibiting active street frontages and visual interest in street facades."* (objective 5.2.1.2). We have reviewed these sites in the context of objective 5.1.2 and, in our view, these sites are inconsistent with the outcome sought to be achieved.

The area is one of a car dominated environment in which many sites have car parking areas addressing the road frontages (for example the Countdown and Pak N Save sites). Further, within the surrounding area there is no uniformity of buildings addressing Victoria Avenue. In other words, there is no distinctive streetscape treatment but rather a combination of car parking, building and planting. Further, the activities that have established in this length of Victoria Avenue tend to be based around vehicle use. For example, the three supermarket sites, the motor lodge and the liquor store.

For these reasons, the environment surrounding the New World and Pak N Saves sites is one of a car based environment which is not conducive to a creating a high quality environment. Conversely that area to the east of Ingestre Street exhibits a uniformity of design. In our view, those characteristics are worthy of the objective to achieve a high quality building design outcome.

Therefore, it is considered that the Outer Commercial Design Guideline Overlay should not apply to the area west of Dublin Street. Specifically the overlay should be removed from the planning maps such that it does not apply properties on Victoria Avenue, to the west of Dublin Street.

Objective 5.2.12 and Policy 5.3.20

For the same reasons outlined above, objective 5.2.12 should be amended as follows:

"To ensure quality building design outcomes in the Outer Commercial zone with new buildings on sites subject to the design guideline overlay exhibiting active street frontages and visual interest in street facades."

Similarly, policy 5.3.20 should be amended as follows:

To promote quality design outcomes in the Outer Commercial zone design guideline overlay by requiring adherence to the Outer Commercial Design Guidelines, in particular, new development is expected to:

- a) Acknowledge, and respond to, the context of the site and the surrounding environment.*
- b) Ensure the bulk, form and siting of new buildings maintains and enhances the quality of the environment.*



- c) *Provide a quality street frontage with visual interest and connection with the street.*
- d) *Ensure visual effects from car parking areas are avoided or mitigated.*

Urban Design Panel

The plan change includes objective (5.3.21) to establish an urban design panel. In our opinion, this is not a policy to achieve an objective. Rather, this is a method to help achieve an outcome.

We recommend that clause 5.3.21 is deleted as a policy. Should this clause progress in PC 49 as a method there needs to more direction around the scale and significance of a development before it is referred to an Urban Design Panel. It is also unclear if this is a mandatory or voluntary process.

Regardless, it is considered that the need for proposals to be considered by an urban design panel should only apply to sites that are located within an area that warrant a specific design outcome. For example, the Design Guideline Overlay (DGO) area. However, as set out above, it is considered that the use of the DGO is too expansive and should not apply to sites on Victoria Street where there is no likelihood of achieving the outcome sought given the nature of existing activities and site layouts.

For these reasons, the requirement for an urban design panel should be carefully addressed to only apply to sites that are subject to the DGO which, as set out above, should not apply to sites on Victoria Street, west of Dublin Street.

We suggest amending the wording as follows (acknowledging that this should not be a policy):

To establish an Urban Design Panel to assist with advice and critique of the design elements of development proposals and adherence to the Council's design guidelines. Triggers for referral to the panel include, ~~but are not limited to~~:

- a) *New buildings and alterations/additions to buildings (visible from public areas) within the town centre;*
- b) *New buildings in the Outer Commercial zone design guideline overlay area;*
- c) *New buildings (visible from public areas or a Residential zone) near the town centre, riverfront, reserve areas, and arterial routes including large format retail, supermarket or apartment buildings and subject to the design guideline overlay area*
;
- d) ~~*Any locally significant development that Council officers consider may benefit from independent urban design review.*~~

Please contact me should you require any clarification or further information.

Yours faithfully
Barker & Associates Ltd

A handwritten signature in black ink, appearing to read 'Matt Norwell', with a stylized, cursive script.

Matt Norwell
Director/Planning Consultant

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