

BEFORE THE HEARINGS PANEL

UNDER

the Resource Management Act
1991 (**RMA**)

IN THE MATTER OF

the Proposed Far North District
Plan (**PDP**)

**STATEMENT OF EVIDENCE OF DAVID BADHAM ON BEHALF OF FOODSTUFFS
NORTH ISLAND LTD**

PLANNING

7 July 2025

1. INTRODUCTION

1.1 This evidence has been prepared on behalf of Foodstuffs North Limited (**Foodstuffs**) as it relates to its submission and further submission on the PDP – Hearing Stream 14. My evidence focuses on responses to the recommendations in the Urban Zones Section 42A Hearing Report (**s42A**).

1.2 My full name is David Eric Badham. I am a Partner and Northland Manager of Barker and Associates (**B&A**), a planning and urban design consultancy with offices across New Zealand. I am based in the Whangārei office, but undertake planning work throughout the country, although primarily in Te Tai Tokerau / Northland.

Qualifications and experience

1.3 My qualifications, experience and involvement with Foodstuffs on the PDP are set out in Attachment 1 to my evidence filed on 13 May 2024 which addressed planning matters in relation to Hearing Stream 1 – Strategic Direction for Foodstuffs. I also:

(a) Filed statements on behalf of Foodstuffs on:

- (i) 22 July 2024 for Hearing Stream 4;
- (ii) 7 October 2024 for Hearing Streams 6 and 7;
- (iii) 12 May 2025 for Hearing Stream 12; and
- (iv) 9 June 2025 for Hearing Stream 13.

- (b) Filed evidence on 18 November 2024 which addressed planning matters in relation to Hearing Stream 9 – Rural and Horticulture on behalf of Foodstuffs.

Purpose and scope of evidence

- 1.4 This evidence addresses the submission (#S363) and subsequent further submission (#FS542) by Foodstuffs on the PDP.
- 1.5 My evidence will address the following topics:
 - (a) My involvement with the PDP on behalf of Foodstuffs and Submission Context (Section 2).
 - (b) Supported recommendations of the Hearing 14 Section s42A (Section 3).
 - (c) Zoning framework (Section 4).
 - (d) Definitions and nesting tables (Section 5).
 - (e) MUZ provisions (Section 6).
 - (f) Section 32AA assessment (Section 7).
 - (g) Concluding comments (Section 8).

Code of conduct

- 1.6 Although this is not an Environment Court proceeding, I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023, and agree to comply with it. My qualifications as an expert are set out in Attachment 1 to my Hearing Stream 1 evidence filed on 13 May 2024. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
- 1.7 I note that the Reporting Officer for the Urban Zone s42A is Sarah Trinder. Ms Trinder worked at B&A for approximately one and a half years from March 2023 – July 2024 before she returned to work for Council. I confirm that I have had no involvement in the Urban Zone topic, nor Ms Trinder's preparation of the Urban Zone s42A, which was

undertaken after she left B&A. I have no conflict of interests to declare as it relates to this evidence.

2. INVOLVEMENT WITH PDP ON BEHALF OF FOODSTUFFS AND SUBMISSION CONTEXT

2.1 My involvement with Foodstuffs and the context of Foodstuffs submission and its presence in the Far North District is outlined in Section 4 of my planning evidence statement for Hearing Stream 9 – Rural and Horticulture on behalf of Foodstuffs.

2.2 I also confirm that I have reviewed the expert urban design evidence of Ms Alicia Lawrie in preparing my statement. I have outlined where I rely on the evidence of Ms Lawrie.

3. SUPPORTED RECOMMENDATIONS OF THE S42A REPORT

3.1 The Reporting Officer for the Urban Zone chapters has recommended the acceptance of several Foodstuffs' submission points or have recommended amendments which are consistent with the relief sought by Foodstuffs. For the submission points outlined in **Attachment 1**, Foodstuffs has confirmed that it is satisfied with the recommendations. I do not address them further within my evidence.

3.2 The remainder of my evidence focuses on the areas in contention where I have a different opinion to that of the Reporting Officer.

4. ZONING FRAMEWORK

4.1 On behalf of Foodstuffs and other submitters¹, I presented planning evidence during Hearing 1 which was critical of the lack of direction regarding a centres hierarchy in the Strategic Direction Chapter, and in particular, the lack of zones that have been utilised in the PDP. This is particularly relevant to Foodstuffs, as most of its existing sites within the Far North District are located within the proposed MUZ.

4.2 Based on the expert planning evidence of Matthew Lindenberg, the Reporting Officer has recommended the introduction of a new 'Town Centre Zone (TCZ)' stating that:²

"93. As stated above in Key Issue 1 NPS- UD, Council has revised its position on the application of the NPS-UD. We are now treating Kerikeri – Waipapa as an urban

¹ Such as Willowridge Developments and McDonald's.

² Paragraphs 93-97 of the S42A Report – Urban Zones.

environment and the Far North District as a Tier 3 local authority. This shift has influenced out analysis of the submission points seeking to introduce new zones for Kerikeri.

94. Council has engaged Mr Linenburg (Planning), Mr McIlrath (Economics), and Ms Rennie (Urban design) to provide technical expertise to assist in my assessment of the merits of introducing a MDRZ and a TCZ for Kerikeri.

95. The approach notified in the PDP, firstly did not recognise Kerikeri / Waipapa as an urban environment, as stated by Mr Lindenberg, this meant the approach did not enable Kerikeri – Waipapa to evolve over time, or allow for a diverse range of housing and business options as per NPS-UD Policy 1. The notified approach is also now not aligned with the Kerikeri/Waipapa Spatial plan.

96. The MDRZ and TCZ are necessary to enable intensification and commercial activity in locations identified as having high housing demand, proximity to employment and commercial centres. The inclusion of these zones provides a mechanism to give effect to the NPS-UD by enabling a greater diversity of housing types and price points near town centres, supports a clear urban hierarchy and provides a planning framework that anticipates and accommodate future growth pressures.

97. I agree with the conclusions in Mr Lindenberg's evidence that the inclusion of both a new MDRZ and TCZ within the PDP, is the most appropriate way for Council to give effect to the relevant policy direction of the NPS-UD. This approach is within the scope of submissions on the PDP."

- 4.3 I support the conclusion regarding the Tier 3 status for Kerikeri / Waipapa, and the subsequent inclusion of a TCZ. While this is an improvement on the "one stop shop" approach of having a single commercial zone via the MUZ, this still does not go far enough in my opinion. I anticipated that the Council would also provide a more detailed response to the application of further zones as outlined in my Hearing 1 evidence, in particular a local centre zone or neighbourhood centre zone.³
- 4.4 In the meantime, I appreciate that the Reporting Officer has indicated that the spatial extent of the new TCZ and actual provisions will be deferred to Hearing 15D so that evidence can be presented. In my opinion, this presents complications for Foodstuffs, and other submitters in the process and evidence for Hearing 14 because:

³ See Section 7, paragraphs 7.1 – 7.8 of my Hearing 1 planning evidence statement for Foodstuffs dated 13 May 2024.

- (a) The spatial extent of the TCZ is presently unknown – the indication is that this will apply to Kerikeri, but no further comment is made by the Reporting Officer or other experts regarding why a TCZ should not apply to Kaikohe or Kaitaia for instance. Even if it is to apply to only Kerikeri, this is frustrating for Foodstuffs as they have to proceed on the basis that their existing stores (e.g., New World Kerikeri) are in the MUZ as notified, until confirmation is provided that they are either within or outside of the proposed TCZ; and
- (b) The nature of the provisions that will apply to the TCZ are presently unknown. As such, Foodstuffs and other submitters do not know how their existing operations and interests will be impacted by the application of the TCZ.

4.5 Foodstuffs did not 'opt in' to the voluntary rezoning process for the Hearing 15D stream. This was primarily because Foodstuffs was awaiting Council's response to the matters raised in the Panel's Minute no. 7, but also Council's response to its submission points on the MUZ Chapter. Now that it is clear that Council will defer the spatial extent of the TCZ and provisions until Hearing 15D stream, Foodstuffs will reserve its right to circulate evidence and attend that hearing as necessary, once Council's recommendations are released.

5. DEFINITIONS AND NESTING TABLES

5.1 Foodstuffs sought the specific inclusion of a definition for "supermarkets" which has been accepted, and I support as outlined in **Attachment 1**.

5.2 Foodstuffs submission also sought the following relief:⁴

"Foodstuffs seek that FNDC review all definitions, and amend overlaps or create definitions for terms which are not currently defined and incorporate nesting tables."

5.3 I understand that the Council have determined to hear general definition submission points in Hearing 17 in November 2025. In my view, there is some merit in considering Foodstuffs and other submitters requests for nesting tables now. This is particularly relevant for Foodstuffs within the scope of Hearing 14, as Foodstuffs existing and future operations will be both classified as a "commercial activity", "large format retail" and a "supermarket" under the new proposed definition. In my opinion, confirming the

⁴ S363.004.

inclusion of clear nesting tables for key activity definitions such as “commercial activity”, “industrial activity”, “civic activity”, “community activity” and “residential activity” now will assist plan usability and interpretation. I mention this further in Section 6 below as it relates to the MUZ provisions.

6. MIXED USE ZONE

Policy Direction for Supermarkets in the Mixed Use Zone

6.1 Foodstuffs made a submission seeking the following relief:⁵

“That Council reconsider the approach to commercial zones and reconsider the most appropriate zoning for existing centres and villages which accurately reflects existing and planned levels of development specific to those areas. Provide sufficient section 32 evaluation to support the approach to zoning.

Alternatively, that MUZ is amended to include policy supporting and enabling supermarkets within MUZ.”

6.2 I have addressed the Council’s approach and Reporting Officer’s recommendations for the zoning framework in Section 4 above.

6.3 The Reporting Officer has otherwise rejected Foodstuff’s submission to include a new policy which supports and enables supermarkets within the MUZ, stating that⁶:

“Taking all the above into account, I have not recommended a permitted framework for supermarkets as it is not necessary to include a specific policy framework for all activity types.”

6.4 I disagree with Reporting Officer’s position for the following reasons:

- (a) First, the Reporting Officer’s statement appears confusing and contradictory as a permitted rule framework has been recommended for supermarkets within proposed Rule MUZ-RXX. While this new rule MUZ-RXX has a GFA requirement which I address further below, it expressly provides for supermarkets as a permitted activity within the MUZ.
- (b) Given the permitted rule framework for supermarkets, I consider that the PDP should also include enabling policy direction for supermarkets to which this rule

⁵ S363.021 and S363.037.

⁶ Paragraph 518 of the S42A Report – Urban Zones.

framework gives effect to. I consider this important as rules are essentially a specific method for implementing the policies, and the clear intent based on the recommendations of the Reporting Officer is that supermarkets are enabled in the MUZ.

- 6.5 Rather than seek a new policy, I simply recommend the following amendment to MUZ-P1 as outlined in **Attachment 2**:

“Enable a range of commercial **(including supermarkets)**, community, civic and residential activities in the Mixed Use zone where:

a. **it they** supports the function, role, sense of place and amenity of the zone, **while recognising** the existing environment; and

b. there is:

- i. existing infrastructure to support development and intensification, or
- ii. additional infrastructure capacity can be provided to service the development and intensification.”

- 6.6 Alternatively, if Foodstuffs relief regarding the inclusion of nesting tables as discussed in Section 5 above is accepted, then I consider that the addition of “(including supermarkets)” may no longer be necessary within this policy.

MUZ-RXX – Supermarkets (Permitted Activity rule) and MUZ-R14

- 6.7 Foodstuffs’ submission sought the following relief:⁷

“Amend MUZ-R1 to provide for an increase to GFA, to ensure that supermarkets (buildings) can be established as a permitted activity and a restricted discretionary activity status where compliance cannot be achieved with the GFA.

Amend MUZ-R1 to provide for additions and alterations to existing buildings with a GFA of more than 400m² where they do not change the existing footprint.

Delete the MUZ-R1 note.”

- 6.8 The Reporting Officer has recommended the following in response:

- (a) Amendments to MUZ-R1 to remove the Gross Floor Area (**GFA**) permitted trigger and direction of this to the activities listed within the MUZ.

⁷

S363.022.

- (b) Amendments to MUZ-R1 so that compliance is only necessary with the height and height in relation to boundary standards in the MUZ for any extensions or alterations to existing buildings which do not increase the building footprint.
- (c) A new permitted activity rule for supermarkets within the MUZ (MUZ-RXX) subject to compliance with a GFA threshold of 450m². Any non-compliance with this results in a restricted discretionary activity where a proposal is required to be assessed against the relevant matters of discretion which I discuss in more detail below.

6.9 I support the Reporting Officer's recommendation to provide a new permitted activity rule for supermarkets within the MUZ. Notwithstanding this, I do not support the inclusion of a GFA threshold of 450m² within the MUZ for the reasons outlined below.

6.10 Supermarkets are a key community asset providing essential goods and services which the community typically anticipate locating within town centres, urban centres or other commercial areas. As I have outlined in Section 4, Council has sought a very simplistic zoning framework which as notified only included the MUZ, and has been recently updated to recommend a TCZ within Kerikeri. Otherwise, other key urban centres within the Far North District (e.g., Kaikohe and Kaitaia) are simply retained as MUZ and contain existing supermarkets. Supermarkets typically require large floor areas to function effectively (greater than 450m²). Strict GFA limits have the potential to unnecessarily restrict the operational and functional needs of supermarkets and will result the need to obtain unnecessary resource consents.

6.11 I am unaware of the technical basis for why the Reporting Officer considers that a 450m² GFA for supermarkets is necessary. The main apparent justification is that "a full-scale supermarket that is larger than 450m² would be substantially inconsistent with the existing character in some MU zoned areas throughout the district."⁸ In my opinion, this statement ignores that a number of existing larger scale supermarkets already exist in these areas (for instance New World Kerikeri, New World Kaikohe and Woolworths Kerikeri). For other MUZ areas throughout the district, I suggest that this is symptomatic of the blunt application of a MUZ to existing urban centres, and as a result, the associated lack of a clear and appropriate centres hierarchy to differentiate between different urban centres.

⁸ See paragraph 509 of the Urban Zones s42A.

6.12 The other justification provided by the Reporting Officer is that “a restricted discretionary pathway could help effectively manage these adverse effects.”⁹ I make the following points in response to this:

(a) The Reporting Officer has not indicated what “adverse effects” need to be managed. In the absence of any specific reference, I assume these relate to the matters of discretion within recommended new rule MUZ-RXX which are as follows:

- a. The extent of any effect on the transport network;
- b. Any access is designed and located to provide efficient circulation on site and avoid potential adverse effects on adjoining sites, the safety of pedestrians and the safe and efficient functioning of the road network;
- c. Minimises building bulk, and signage while having regard to the functional requirements of the activity; and
- d. Landscaping is provided especially within surface car parking areas to enhance amenity values.

(b) In my opinion, these matters, and the effects they seek to address, are already addressed by other provisions within the PDP. For instance:

(i) Effects on the transport network (clause a) and access (clause b) are already addressed by the provisions within the Transportation Chapter. More specifically, there is permitted GFA threshold of for supermarket activities in the Transport Chapter.¹⁰ Any exceedance of this requires resource consent for a restricted discretionary activity and the commissioning of an integrated transport assessment under TRAN-R5. Access requirements are also addressed within the Transport Chapter with comprehensive provisions and consenting triggers included to address the matters raised in clause b.

(ii) Similarly building bulk and signage (clause c.) are already addressed. The MUZ includes a comprehensive set of standards (MUZ-S1 – MUZ-S7, and MUZ-S10) which address the applicable bulk and location requirements for the zone, with restricted discretionary activity resource

⁹ See paragraph 509 of the Urban Zones s42A.

¹⁰ Within my Hearing 11 evidence statement dated 14 April 2025, I opposed the notified trip generation threshold of 200m² within the Transportation Chapter and sought a trip generation threshold of 750m² which was recommended as appropriate in the supporting traffic evidence for Hearing 11 by Mr Leo Hills.

consent is required if they standards are not meet. Similarly, the Signs Chapter includes a comprehensive set of provisions to manage signage, including within the MUZ, with appropriate resource consenting triggers when compliance is not met.

(iii) Finally for landscaping (clause d.), requirements are specifically included in MUZ-S8 and MUZ-S9, with a restricted discretionary activity resource consent requirement when these standards are not met.

(c) With regard to the above, I see no additional benefit in essentially “double handling” traffic, access, bulk and location, signage and landscaping assessment / resource consent requirements in the PDP when these are already clearly and effectively addressed elsewhere. In my opinion, this leads to an inefficient and ineffective duplication of consenting requirements and associated costs, with no clear material benefit in terms of addressing apparent adverse effects.

6.13 Notwithstanding the above, I also note that there is a confusing overlap in definitions and the application of rules as it relates to MUZ-RXX and MUZ-R14 which makes “large format retail”¹¹ a blanket discretionary activity. This would clearly contradict the permitted activity rule for supermarkets as recommended by the Reporting Officer whom has recommended that any supermarket is permitted, provided it is less than 450m² GFA, with a default to restricted discretionary if not. To address this confusing overlap, and with specific reference to the scope of Foodstuffs submission points, I recommend that MUZ-R14 be specifically amended to exclude supermarkets. However, I consider that a strong argument could be made that MUZ-R14 should be deleted entirely.

6.14 Noting the above, and in the absence of any compelling evidence to the contrary, I recommend that the GFA requirement in new Rule MUZ-RXX be deleted as outlined in **Attachment 2**. I also recommend that MUZ-R14 be consequentially amended to exclude supermarkets, similar to what has been done in MUZ-R2.

MUZ-S5 and MUZ-S6 – Pedestrian Frontages and Verandahs

¹¹ Proposed to be defined as “means any individual retail tenancy with a gross floor area greater than 450m².”

6.15 Foodstuffs sought an exemption for supermarkets from the pedestrian frontage and verandah requirements within the MUZ.¹²

6.16 The Reporting Officer has rejected this submission, stating:¹³

“As I have recommended a new restricted discretionary rule for supermarkets, I do not consider it necessary to have exemptions from the verandah and pedestrian frontage standards as supermarkets are restricted discretionary activities already and addressing the criteria relating to these standards is appropriate. Exemptions could result in significant ‘gaps’ in the pedestrian frontage and undermine the purpose of the verandah and pedestrian frontage standards.”

6.17 I have addressed the Reporting Officer's recommended restricted discretionary activity rule for supermarkets in the previous section. Notwithstanding this and in specific response to the Reporting Officer's recommendation on veranda and pedestrian frontage standards, Foodstuffs engaged Ms Lawrie to provide an urban design response.

6.18 Ms Lawrie's evidence agrees in principle with the pedestrian frontage and verandah standards but has reviewed them more specifically as they relate to Foodstuffs existing operations in the Far North, and identified particular concern with the pedestrian frontage overlay that applies to the New World Kaikohe. Based on her careful and detailed assessment, Ms Lawrie has recommended that this be deleted.

6.19 I rely on the expert evidence of Ms Lawrie as it relates to the appropriate spatial application of the pedestrian frontage overlay within Kaikohe. On this basis, I agree with Ms Lawrie's conclusions and recommend that the pedestrian frontage overlay be deleted from the area outlined in her evidence and replicated in **Attachment 2**.

6.20 Otherwise, based on the expert opinion of Ms Lawrie, I accept the general recommendation of the Reporting Officer to retain the pedestrian frontage and verandah provisions.

7. SECTION 32AA ASSESSMENT

7.1 Section 32AA of the RMA requires further evaluation where changes are made to a proposal since the original Section 32 evaluation. I have recommended amendments

¹² S363.023 & S363.024.

¹³ Paragraph 514 of the S42A Report – Urban Zones.

to the provisions of the MUZ Chapter, as set out in **Attachment 2** to my evidence. I consider that these amendments are the most appropriate way to achieve the relevant objectives of the PDP, for the following reasons:

- (a) **Amended policy for supermarkets:** My recommended amendment provides greater recognition and provision for supermarkets within the MUZ and ensures that the rule framework gives effect to the policy framework.
- (b) **MUZ-RXX and MUZ-R14 – Supermarkets:** these amendments ensures that supermarkets are enabled within the MUZ where they are logistically anticipated without resulting in unnecessary resource consents and associated costs. From a planning perspective, this improves the effectiveness and efficiency of this rule without removing the requirement to assess supermarkets against the other permitted rules and standards within the MUZ, traffic / access rules/standards within the Transport Chapter or Signs Chapter of the PDP.
- (c) **MUZ-S5 and MUZ-S6:** I rely on Ms Lawrie's expert evidence which recommends deleting the pedestrian frontage overlay from New World in Kaikohe. This change ensures that the existing supermarket in this location is not subject to compliance with these pedestrian frontage requirements, reducing the risk of unnecessary resource consents and associated costs. From a planning perspective, this improves the effectiveness and efficiency of these standards without undermining the purpose of the permitted thresholds.

7.2 Overall, I consider the social and economic benefits of the recommended amendments—including reduced compliance costs, improved clarity, and a more enabling framework for supermarket development—to outweigh any potential costs.

8. CONCLUDING COMMENTS

8.1 In conclusion, I consider that a number of the recommendations in the Section 42A Report require refinement to ensure the PDP achieves its intended outcomes without imposing unnecessary regulatory burden.

8.2 In particular, I highlight the following in summary:

- (a) I still retain concerns regarding the zoning framework within the PDP, and the lack of confirmed detail regarding the spatial extent of the TCZ and provisions that apply. On this basis, Foodstuffs have reserved the right attend Hearing 15D to present evidence relating to its interests as relevant;

- (b) Policy direction for supermarkets within the MUZ should be provided to ensure that the policy framework is enabling for supermarkets and reflective of the recommended permissive rule framework;
- (c) The permitted rule for supermarkets in the MUZ should be amended to exempt supermarkets from the permitted GFA threshold of 450m². This will reflect more realistic expectations of supermarket floor areas and avoid unnecessary consenting; and
- (d) The Pedestrian Frontage Overlay should be deleted from the New World in Kaikohe.

8.3 I have recommended amendments to the provisions as outlined in **Attachment 2**, and have undertaken a section 32AA Evaluation which I consider demonstrates that the amendments are more efficient and effective at achieving the relevant objectives for the MUZ Chapter.

David Eric Badham

Date: 7 July 2025

Attachment 1 – Areas of Agreement with the Reporting Officer / S42A

Definitions

These include the following submission points:

- (a) S363.005¹⁴ – support the Reporting Officer's recommended new definition for 'supermarket'.

Mixed Use Zone

These include the following submission points:

- (a) 363.022 – support the addition of a new permitted activity rule for supermarkets, and the subsequent amendments to MUZ-R2 to exclude supermarkets, the subsequent amendments to MUZ-R1, and deletion of the note in MUZ-R1 – notwithstanding my recommended consequential amendment to Rule MUZ-RXX outlined in Section 6 above.
- (b) S363.025 – support the exclusion of supermarkets from MUZ-R2.

Light Industrial Zone

These include the following submission points:

- (a) S363.029 – Support the amendments to Rule LIZ-R1.
- (b) S363.030 & S363.031 – support the new permitted activity rule (LIZ-RYY) for supermarkets in the Light Industrial Zone located within the Waipapa Control Area. Support the new discretionary activity rule (LIZ-RYY) for supermarkets in the Light Industrial Zone not located within the Waipapa Control Area.
- (c) S363.032 – support the decoupling of the engineering standards from the PDP.

¹⁴ I note that the Reporting Officer noted this as submission point s363.030 (see page 124 of the s42A), but the submission number is actually S363.005 within Foodstuffs submission.

**Attachment 2 – Recommended Amendments to Mixed Use Zone Chapter Provisions
and Mapping**

S42A recommended wording = additions underlined text deletions ~~strikethrough text~~

David Badham recommended wording = additions underlined text deletions ~~strikethrough text~~

MIXED USE ZONE PROVISIONS

MUZ-P1

Enable a range of commercial (including supermarkets), community, civic and residential activities in the Mixed Use zone where:

- a. ~~it~~ they supports the function, role, sense of place and amenity of the zone, while recognising the existing environment; and
- b. there is:
 - i. existing infrastructure to support development and intensification, or
 - ii. additional infrastructure capacity can be provided to service the development and intensification.

MUZ-RXX – Supermarkets

“Activity status: Permitted

PER-1

~~The new building or structure, relocated building or extension or alteration to an existing building or structure on the site, does not exceed GFA 450m².~~

Activity status where compliance not achieved: ~~Restricted Discretionary~~ Not applicable

Matters of discretion are restricted to:

- ~~a. The extent of any effect on the transport network;~~
- ~~b. Any access is designed and located to provide efficient circulation on site and avoid potential adverse effects on adjoining sites, the safety of pedestrians and the safe and efficient functioning of the road network;~~
- ~~c. Minimises building bulk, and signage while having regard to the functional requirements of the activity; and~~
- ~~d. Landscaping is provided especially within surface car parking areas to enhance amenity values.”~~

MUZ-R14 – Large format retail (excluding supermarkets)

PEDESTRIAN FRONTAGE OVERLAY MAPPING

Delete the pedestrian frontage overlay as it applies to the New World Kaikohe store in the location outlined in red below.

