

24 April 2025

Far North District Council  
Attn: Hearings Administrator

By email: [alicia-kate.taihia@fndc.govt.nz](mailto:alicia-kate.taihia@fndc.govt.nz)

## **Hearing Statement of Woolworths New Zealand Limited (submission 458) on the Far North Proposed District Plan – Hearing Stream 11 Energy, Infrastructure, Transport & Designations**

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### **1. Submission Details**

Submitter: Woolworths New Zealand Limited  
Submitter Contact: Ross Burns  
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### **2. Purpose of this statement**

- 2.1 The purpose of this statement is to reconfirm the submission point made by Woolworths New Zealand Limited (“Woolworths”) regarding the Transport chapter of the Far North Proposed District Plan (“PDP”) in submission 458. Woolworths will not be presenting evidence at the hearing, but instead advise of their position in respect of the submission points relevant to Hearing Stream 11 through this tabled statement.

### **3. Background**

- 3.1 As noted in Woolworth’s submission, Woolworths generally supports the intent of the PDP, being a move towards an activity-based plan. However, Woolworths is concerned with a number of proposed rules and standards that will affect the continued operation of Woolworths stores within the District. The ability to provide and undertake development and redevelopment of existing stores has become particularly relevant in the last few years as operations and technologies have had to change to support customers and staff.

### **4. Section 42A Report**

- 4.1 The Section 42A Reporting Planner recommends rejecting the Woolworths’ submission point 458.005 made in submission 458 on the Transport Chapter of the PDP.

## 5. Submission Point 458.005

- 5.1 Submission point 458.005 sought that the trip generation threshold for supermarket activities proposed by the PDP, recorded in TRAN-Table 11 be increased from 200m<sup>2</sup> Gross Floor Area (GFA) to 1,500m<sup>2</sup> GFA. The submission point is that this threshold is unnecessarily low, noting that many other districts in the country have a trip generation threshold for supermarkets and commercial activities ranging between 1,000m<sup>2</sup> - 2,000m<sup>2</sup> GFA.
- 5.2 In rejecting Woolworths submission point 458.005, the s42A Reporting Planner states that he prefers to rely on the Abley Transport Technical Advice Report (supporting doc to s32 report), in which the 200m<sup>2</sup> threshold aligns with the trip generation rates calculated by NZTA.
- 5.3 In the s42A Report the Reporting Planner recommends that an amendment to TRAN-R5 be made to specify that the trip generation threshold only apply to: new activities; to the GFA of the extension; or to any proposed increase in the number of people compared to the existing activity. Woolworths supports this change as it directly impacts how the TRAN-Table 11 is implemented which will have a direct impact on additions or redevelopment to existing stores, or new stores.
- 5.4 Provided this approach is accepted by the Hearings Panel, Woolworths seeks the threshold applied to supermarkets under TRAN-Table 11 be increased to 750m<sup>2</sup>.
- 5.5 Woolworths respectfully asks the Hearing Panel to consider their submission as expanded on further below.

### *Reason for submission*

- 5.6 Woolworths recognises that by nature, a supermarket does have a heavy reliance on vehicle trips. Woolworths is supportive of and committed to ensuring that all movements to, from and within its stores is safe and efficient for all customers and staff.
- 5.7 Across the Far North District, Woolworths operate three existing stores, one at Kerikeri, Kaikohe and Paihia. These stores range from 1,200m<sup>2</sup> – 3,800m<sup>2</sup>, and are therefore all substantially over the threshold currently proposed by TRAN-Table 11. Elements of these stores will likely need replacement and/or expansion in the near future to ensure they can continue to service the communities in which they are located. Based on the threshold applied to supermarkets under TRAN-Table 11, even the most modest of additions to these stores will require an Integrated Transport Assessment to support the addition.
- 5.8 In the context of a supermarket, changes to floor areas does not automatically result in an increase in activity. The supermarket activity is already occurring, and the service it provides to the community already exists. There is no new need created which would bring more persons to the site. Most often the new or additional GFA supports a more efficient operation of the store. For example, an addition to an existing store which increases the service and storage area. A larger area can now store a greater amount of goods, which can be delivered in a single delivery

as opposed to multiple deliveries spaced throughout the week due to a limited storage area. This in turn reduces the number of delivery vehicles visiting the site.

- 5.9 Increasing the threshold to a greater floor area is considered more likely to reflect an occurrence where the intensity of the activity may actually increase, so a larger floor area is a more appropriate resource consent trigger. That is, a standard which results in the need for resource consent and an assessment by a suitably qualified transport engineer is appropriate when environmental effects increase to a point where the need for that assessment is created. An increase to the floor area of a supermarket by just 200m<sup>2</sup> will not increase traffic effects in a way that requires assessment by a transport engineer.
- 5.10 Further to the above, the nature of a supermarket activity typically requires a site which is located in proximity to where its customers and staff live or frequently visit, and where they are able to be easily serviced. For these reasons, supermarkets generally locate where they have good road network connections which serve a purpose of carrying larger volumes of vehicles and freight. In the Far North District, each of Woolworths existing stores have frontage to and take access from roads which are classified as Arterial, Primary Collector and Secondary Collector Roads (One Network Classification). In accordance with the PDP description of these road classifications, these roads have an expectation of carrying moderate to significant passenger transport movements, and link areas of population and economic sites. These roads are not low volume and therefore slight increases in vehicle movements are unlikely to be impactful on the network, or the safety of its users.
- 5.11 As raised in the original submission, other Council's around the country commonly apply a trip generation threshold to various activities, however by comparison the threshold for supermarkets in other District Plans is often greater than that proposed by the PDP. The Whangarei District Plan applies 750m<sup>2</sup> as the first threshold for a basic Integrated Transport Assessment (ITA), and a 1,500m<sup>2</sup> secondary threshold for a grocery store. The Kaipara District Plan is not reported to have a trip generation threshold for grocery stores. Under the Partially Operative Selwyn District Plan the threshold for a basic ITA is 200m<sup>2</sup> and a full ITA is 900m<sup>2</sup>. The Auckland Unitary Plan uses a threshold of 1,667m<sup>2</sup> for new development and notably does not apply this where the activity is located in the Business Zones, where a supermarket is anticipated to be located.

## **6. Conclusion**

- 6.1 Woolworths maintains the position that the trip generation threshold for supermarket activities proposed by the PDP, recorded in TRAN-Table 11 is unnecessarily low and overly conservative, should be increased.
- 6.2 Woolworths supports the recommendation made by the s42A Reporting Planner, to amend TRAN-R5 to specify that the trip generation threshold only apply to new activities, and to the GFA of the extension, or to the increase in the number of people compared to the existing activity.

Provided this recommendation is accepted by the Hearing Panel, Woolworths seeks the trip generation threshold for supermarket activities be increased to 750m<sup>2</sup>.

- 6.3 If this recommendation is not accepted, Woolworths maintains their original position as set out in submission point 458.005.
- 6.4 Woolworths does not wish to be heard in support of this statement however I will make myself available for questions from the Hearings Panel if requested.
- 6.5 Woolworths will not gain an advantage in trade competition through this statement.
- 6.6 Please contact me if you require any further clarification on the above statement.

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