

12 May 2025

Hearings Panel
Proposed Far North District Plan
Far North District Council
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Tēnā koutou Commissioners,

Proposed Far North District Plan – Hearing 12 – Historic and Cultural Values

Foodstuffs North Island Limited (**Foodstuffs**) is made up of several independent co-operatives, with all employees and retail members supportive of the organisation's commitment to provide New Zealanders with the best possible service and quality products. The Foodstuffs North Island co-operative employs more than 1700 people who support the 102 New World, 43 PAK'n'Save and 167 Four Square owner-operated retail supermarkets throughout the North Island. Of these, Foodstuffs currently has 16 established supermarkets in the Far North District.

As I understand it, in Foodstuff's experience across New Zealand, regional and district planning frameworks often do not properly recognise the need for business growth to occur, including alongside residential growth. Given Foodstuffs' significant past and planned further investment in New Zealand, the contents of any future district plan provisions will be integral to the continuing operation and development of Foodstuffs in the Far North.

Foodstuffs support the Council Officer's following recommendations contained in "Section 42A Report – Heritage Area Overlay and Historic Heritage":

- To accept Foodstuffs submission point in relation to Rule HA-R1. The Council Officer recommended retaining the default restricted discretionary activity status. This satisfies the relief sought by Foodstuffs regarding their concerns around a default discretionary activity status being onerous when the scope of potential effects is limited and well understood.
- To accept in part Foodstuffs submission point in relation to Rule HA-R2. The Council Officer agrees with Foodstuffs that non-compliance with Rule HA-R2 should be a restricted discretionary activity, unless the additions and alterations are to a scheduled Heritage Resource (i.e. non-compliance with PER-1). Foodstuffs consider it unlikely that any existing buildings/structures they have interest in are a Scheduled Heritage Resource. As such, this satisfies the relief sought by Foodstuffs regarding their concerns around a default discretionary activity status being onerous when the scope of potential effects is limited and well understood.
- To accept Foodstuffs submission point in relation to Rule HA-R5. The Council Officer agrees with Foodstuffs that any infringement of Rule HA-R5 in any Heritage Area Overlay should be a restricted

discretionary activity. This satisfies the relief sought by Foodstuffs regarding their concerns around a default discretionary activity status being onerous when the scope of potential effects is limited and well understood.

Foodstuffs generally support the Council Officer's recommendation to accept Foodstuffs submission in relation to Rule HA-R8 and provide for new buildings or structures in the Kororāreka Russell Heritage Area Overlay (or any of the other Part A type overlays) as a restricted discretionary.

However, they disagree that a default discretionary activity status applies where the site to be developed has frontage to the coastal marine area (RDIS-1) or the building/structure does not comply with HA-S1 or HA-S1 (RDIS-2). Foodstuffs consider that a default to a full discretionary activity is unnecessary as full discretion is not required for consideration of a new building or structure located on a site with frontage to the coastal marine area. The existing matters of discretion under Rule HA-R4 provide suitable direction and discretion regarding the assessment of relevant matters (i.e. the location and relationship of the building or structure in relation to the coastal marine area).

I can confirm that Foodstuffs will not be filing evidence for Hearing 12 at this stage and does not wish to be heard at the hearing. However, I am available to answer any questions from the Hearing Panel either in writing or via videoconference if required.

Yours sincerely | Nāku noa, nā

Barker & Associates Limited



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