

From: [Daniel Sadlier](#)
To: [Policy Shared](#)
Subject: External Sender: Private Plan Change 35 to the Waipa District Plan: submission by Foodstuffs North Island Limited
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To whom it may concern,

We act for Foodstuffs North Island Limited (“**FSNI**”).

Attached for lodgement is a copy of FSNI’s submission in relation to the above plan change.

Please acknowledge receipt of this submission by return email.

Nga mihi / kind regards,
Daniel

Daniel Sadlier | PARTNER



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**SUBMISSION ON PROPOSED PRIVATE PLAN CHANGE 35 TO THE WAIPA DISTRICT PLAN: TE
AWAMUTU RETAIL CENTRE**

Clause 6 of Schedule 1 of the Resource Management Act 1991

To: Waipa District Council
districtplan@waipadc.govt.nz

FOODSTUFFS NORTH ISLAND LIMITED at the address for service set out below ("**FSNI**") makes the following submission in relation to Proposed Private Plan Change 35 ("**the Plan Change**" or "**PC35**") to the Waipa District Plan ("**District Plan**").

1. The Plan Change seeks to amend the provisions of the district plan for the Te Awamutu Large Format Retail Centre at 670 Cambridge Road, Te Awamutu. It also proposes to rezone the nearby land at 638 Cambridge Road from Medium Density Residential Zone to Commercial Zone and to include this land as part of the centre.
2. FSNI will be directly affected by the Plan Change as the owner, and through its member the operator, of Pak'n Save Te Awamutu, which is located within the Te Awamutu Large Format Retail Centre at 670 Cambridge Road ("**Pak'n Save**").
3. FSNI could not gain an advantage in trade competition through this submission.
4. Provided the issues raised in the submission are addressed, FSNI does not oppose PC35 for the reasons set out below. The Submitter has a particular interest in:
 - (a) Consultation
 - (b) Integration with future development in Area A
 - (c) Site Plan
 - (d) Landscaping
 - (e) Vehicle crossings
 - (f) Future traffic upgrades
 - (g) Carparking
 - (h) Zoning

5. The reasons for the submission are as follows:

- (a) Unless the relief sought below in this submission is granted, the Plan Change will:
 - (i) Not promote the sustainable management of natural and physical resources;
 - (ii) Not amount to and promote the efficient use and development of resources;
 - (iii) Be inconsistent with the purpose and principles in Part 2 of the Resource Management Act 1991 (“**RMA**”); and
 - (iv) Not be appropriate in terms of section 32 of the RMA.
- (b) Provided the relief sought below in this submission is granted, the Plan Change will be in accordance with the purpose and principles of the RMA and will be appropriate in terms of section 32 of the RMA.

6. In particular, but without derogating from the generality of the above:

- (a) The AEE supporting the Plan Change states that FSNI “*expressed general support for the Plan Change, including the proposed backfilling of the existing Mitre 10 site*”. It is not clear who the applicant spoke to in this regard. FSNI as owner of the site was advised that the applicant intended to apply for a private plan change and noted a number of matters. FSNI neither reviewed nor provided feedback on this Plan Change prior to notification. FSNI records that it has concerns with the Plan Change as set out below.
- (b) The Plan Change assumes that Area A is “built out” and will not substantively change into the future. However, that may not be the case. The manner in which consumers purchase and collect groceries has changed since the Pak’n Save was initially established. While many people continue to shop in the traditional manner by driving to supermarkets, browsing store aisles and purchasing their goods through check-outs before returning home, a growing number of people prefer the convenience of shopping on-line and having their groceries delivered or otherwise to “click and collect” their groceries in purpose built “e-commerce” facilities co-located with the relevant supermarket. FSNI is considering establishing such a facility at the Pak’n Save, which would require the construction/extension of built form and separate traffic circulation (among other things). The natural location for such a facility would be adjacent to the right of way / Access 1, on the western façade of the Pak-n Save building. FSNI is concerned that the Plan Change as proposed could undermine the ability to establish,

or suitably integrate, such a facility with the surrounding Large Format Retail Centre, particularly as it is proposed to be expanded to include 538 Cambridge Road.

(c) Of particular concern:

(i) *Landscaping* – The Plan Change proposes:

- Substitution of a new site plan, titled “Te Awamutu Large Format Retail Centre Plan” prepared by Woodhams Meikle Zhan Architects and dated 19 September 2025 (“**Site Plan**”). The Site Plan, among other things, identifies landscape buffer areas, including along the western edge of Area A.
- A new landscaping standard 6.4.2.22(c) in the Commercial Zone chapter which relates to the landscaping strip shown on the Site Plan. The requirement to provide this landscaping strip is a new consent requirement that may limit the ability of FSNI to establish new vehicle crossings in future.

FSNI considers that these aspects of the Plan Change effectively require the provision of landscape buffer to mitigate development of Area B. It is not for FSNI to mitigate the effects of the applicant’s proposed development. The Plan Change should be amended to delete this landscaping strip from the Site Plan.

(ii) *Vehicle crossings* – The Plan Change proposes three new vehicle crossings to access the 638 Cambridge Road site via the existing right of way running between 638 and 670 Cambridge Road. These are illustrated as “indicative vehicle access points” on the Site Plan. The location of these accesses, in particular the southern-most illustrated crossing, have the potential to affect the existing and future use of accesses from the right of way to 670 Cambridge Road, including servicing the existing Pak’n Save and traffic movements/construction of any future e-commerce facility to be established by FSNI. FSNI considers that the location of the proposed access points should be reconsidered in light of its concerns, and to ensure that construction and day to day operation of the existing and upgraded Pak’n Save is not unduly affected.

(iii) *Future traffic upgrades* – The Traffic Assessment supporting the Plan Change refers to potential upgrades at the Cambridge Road intersection to manage future traffic generation (a shared pedestrian path, pedestrian facility and traffic

signals). The Plan Change requires these upgrades prior to any activities commencing within Area B (standard 6.4.2.22(d)). The design and implementation of these upgrades could adversely affect both future construction works and day to day operation of the Pak'n Save, particularly servicing and deliveries to the site. The potential for these effects must be comprehensively assessed, and appropriately mitigated to ensure the safe and efficient ongoing operation of existing and future activities at the Pak'n Save.

- (iv) *Site plan* – It would be appropriate for the replacement site plan to capture any building extensions and new vehicle crossing established as part of any future development within Area A, which have been consented up to and including the date when the Plan Change becomes operative. FSNI seeks that flexibility is retained to allow this to occur.

- (d) *Use of carparking* – FSNI is concerned that:

- (i) The proposed development within Area B does not include sufficient carparking to provide for demand likely to be generated by that development;
- (ii) The existing “Mitre 10” box within Area A is likely to be split into smaller tenancies that will cumulatively generate a higher demand for carparking than currently exists; and
- (iii) In addition to the above, the significant expansion of the Large Format Retail Centre to include Area B will exacerbate existing issues where Pak'n Save carparking is used by customers of other tenants within the centre.

The Plan Change should be accompanied by a robust analysis that demonstrates that sufficient carparking is provided to ensure that the Pak'n Save site carparking is not required to meet the demand for carparking associated for other tenancies within the Large Format Retail Centre. If that analysis demonstrates a shortfall, or any adverse effects in terms of the use of the Pak'n Save carpark or the safe and efficient circulation of traffic within the centre or immediate network, then the Plan Change should be amended to reduce building Gross Floor Area limits to manage demand to an appropriate level.

- (e) *Zoning anomaly* – The Plan Change introduces new Area B, which it proposes is zoned Commercial Zone. However, it does not propose rezoning of the right of way / “Access 1” which at present is included (together with Area B) in the Medium Density Residential Zone. FSNi considers it appropriate that the whole of 638 and 670 Cambridge Road be consistently zoned Commercial Zone.

7. FSNi seeks the following relief with regard to PC 35:

- (a) That the Plan Change is amended to address the concerns expressed in this submission;
- (b) Without limiting the generality of the above, that the Plan Change is amended:
 - (i) To delete the landscape buffer area from the Site Plan, and delete the new landscaping rule 6.4.2.22(c);
 - (ii) To delete or amend the location of the indicative vehicle access points illustrated on the Site Plan and located on the eastern boundary of Area B;
 - (iii) To ensure the design and implementation of any future traffic upgrades will not adversely affect the ongoing and future operation of the Pak’n Save at 670 Cambridge Road is not compromised;
 - (iv) To ensure sufficient carparking is provided within Areas A and B to cater for the new, or changes to existing, activities in those areas, including if necessary by reducing allowable building GFA;
 - (v) That the Site Plan is updated to reflect newly proposed or consented activities in Area A, in the event such activities are proposed or consented during the Council’s consideration of the Plan Change; and
 - (vi) To rezone the right of way / Access 1 to Commercial Zone consistent with the zoning of Area A and the proposed zoning of Area B.
- (c) Such alternative or other relief or consequential amendments as are considered appropriate or necessary to address the concerns set out in this submission.

8. FSNI wishes to be heard in support of this submission. If other parties make a similar submission, FSNI would consider presenting a joint case with them at the hearing.

DATED this 14th day of November 2025



David Boersen – Senior Development Manager
Foodstuffs North Island

ADDRESS FOR SERVICE: Foodstuffs North Island Limited, 35 Landing Drive, Mangere, Tāmaki Makaurau Auckland, 2022. Attention: [REDACTED] Copy to Ellis Gould, Level 31 Vero Centre, 48 Shortland Street, Auckland Central. Attention: Daniel Sadlier [REDACTED]