
Submission Summary - Proposed Wairau/Awatere Resource Management Plan - V42-Review of the Central Business Zone - By Name

Richard Walter - Participant #: 1

Submission Point: V42 - Whole Variation

Submission: The submitter opposes Variation 42 stating there should be growth outside of the CBD. The proposed retail park at Springlands is a good example of growth in Blenheim and there will still be an active CBD. This will also ease car parking in the CBD and provide for the nationwide chains to enter the Blenheim commercial trading market.

"Objectives and Policies" and "Measures" to ensure the Blenheim town centre remains the focus etc are not detailed or mentioned in any way.

Relief sought: 1. There should be growth outside of the CBD.

2. If changes are to be made, the actual 'measures' should be transparent to the public and included in the proposed Variation.

S Stanley - Participant #: 2

Submission Point: V42 - Whole Variation

Submission: The submitter supports any rezoning proposal to protect Blenheim's CBD and opposes proposals mooted for St Andrews and the western entrance to Springlands.

Relief sought: No specific relief was sought by the submitter. However, the Council has inferred the submitter's support to be seeking a retention of Variation 42 as notified.

William H Cox - Participant #: 3

Submission Point: V42 - Whole Variation

Submission: The submitter states it is essential to maintain the viability of established shops etc in the CBD.

Relief sought: No specific relief was sought by the submitter. However, the Council has inferred the submitter's comments regarding maintaining the viability of the established shops etc to be seeking a retention of Variation 42 as notified.

Robyn Caughey - Participant #: 4

Submission Point: V42 - Whole Variation

Submission: Town planning trends re: gift and hardware, hair salons, eateries, florists, whiteware etc being grouped in one area/street allows both the customer and retailer best possible access one to the other. Industrial/commercial retailers could best be removed outside the CBZ area.

Questions need to be asked around where people want to shop.

Relief sought: No specific relief was sought by the submitter on the Variation. The submitter said their preference as a 65 year old was to "let the olds look after the CBZ with elite apartments on top floors and good parking area covered and street overbridge".

Russell Hopkins - Participant #: 5

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42.

Relief sought: No specific relief was sought by the submitter. However, the Council has inferred the submitter's support to be seeking a retention of Variation 42 as notified.

C Rayner - Participant #: 6

Submission Point: V42 - Whole Variation

Submission: The submitter opposes Variation 42 completely. There have been many changes to the Blenheim business centre over the years at the ratepayers cost, leave it and move out of town.

Relief sought: No specific relief was sought by the submitter. However, the Council has inferred the submitter's opposition to be seeking none of the changes proposed by Variation 42.

John Curd - Participant #: 7

Submission Point: V42 - Whole Variation

Submission: The submitter opposes Variation 42 because the CBD has a monopoly of the shopping in Blenheim. A more liberal approach to shops should be allowed to move the town forward. The proposed new shopping centre at Springlands for Pak n Save and hopefully a food court like in other centres would be very beneficial to Blenheim.

Relief sought: To allow shopping malls to be built near the town as soon as possible.

Joanne Brady - Participant #: 8

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42 believing it to be important to concentrate the business and social activity of the town in the CBD. This means the town becomes more lively, vibrant and attractive and promotes foot traffic rather than the car to mall mentality.

Relief sought: It is important the Variation is supported with the provision of adequate convenient and inexpensive parking.

Jennian Homes (Simon Collett) (Simon Collett) - Participant #: 9

Submission Point: V42 - Whole Variation

Submission: The focus of a good vibrancy within a small town is always best by building on the current CBZ, not spreading things out.

Relief sought: No specific relief was sought by the submitter. However, the Council has inferred the submitter's submission to be seeking a retention of Variation 42 as notified.

Paul Way - Participant #: 10

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42 and the ongoing principle of full progress. Change is considered necessary by the submitter to meet the future.

Relief sought: No specific relief was sought by the submitter. However, the Council has inferred the submitter's support to be seeking a retention of Variation 42 as notified.

Nigel & Leticia Henderson - Participant #: 11

Submission Point: V42 - Whole Variation

Submission: The submitter's support Variation 42.

Relief sought: No specific relief was sought by the submitters. However, the Council has inferred the submitters' support to be seeking a retention of Variation 42 as notified.

Bruno Dalliessi - Participant #: 12

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42 as it will ensure a controlled and vibrant town business zone.

Relief sought: No specific relief was sought by the submitter. However, the Council has inferred the submitter's support to be seeking a retention of Variation 42 as notified.

Marlborough Traders Limited (Ted Laws) (Ted Laws) - Participant #: 13

Submission Point: V42 - Whole Variation

Submission: The submitter opposes Variation 42 for the following reasons:

- Council's own assessments show that a lot more land is needed than is available in the CBZ.
- A lack of space in the CBZ has made rents rise to the point where only shops owning their own site or chain stores being able to show good returns.
- It is impossible for small locally owned businesses to expand because a lot of the CBZ is owned by a few people and a lot of these are from out of the district.
- Large format retail (Briscoe's, Warehouse etc) building in the CBZ decrease the 'tourist look' we are trying to promote.

Relief sought: Adopt Options 4 and 3 with the aim of defining and infilling the CBZ and locating all large format boxes in a new zone, not in the CBZ.

T Wise - Participant #: 14

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42.

Relief sought: 1. No specific relief was sought by the submitter. However, the Council has inferred the submitter's support to be seeking a retention of Variation 42 as notified; and

2. Create free all day parking for employees and additional parking for customers.

Alan Perano - Participant #: 15

Submission Point: V42 - Whole Variation

Submission: Do absolutely nothing until State Highway 1 is moved east. Starting north of Spring Creek and coming out south of Riverlands. Then it and its surroundings can be correctly planned.

Relief sought: Don't make any changes until State highway 1 is moved east.

Pukematai Farm Limited (A A White) (A A White) - Participant #: 16

Submission Point: V42 - Whole Variation

Submission: Having a multi storied car parking building in the CBD would have many positive advantages.

Relief sought: The Council should seriously consider purchasing the area of land in Wynen Street from the Workings Men's Club so the area can be turned into a multi storied car park for present and future requirements.

Steve Bezar - Participant #: 17

Submission Point: O11.3.1.4.2 - Urban Environments: New objective and explanation

Submission: The submitter supports retaining and consolidating business activities in the CBZ but states the activities must not be at the expense of adjacent residents who have a right to peaceful occupancy of their properties.

The submitter also supports the creation of a large format retail area/zone because the CBZ cannot entertain such an area, nor should it because there is no parking available for large trucks or shoppers.

Relief sought: 1. Ensure that all considerations are given to adjacent residential zones so that no intrusive or negative effects are created and caused by the CBZ to the residential zone.

2. Where appropriate include buffer zones to reduce/eliminate negative effects on adjacent residents.

Kinross Industries Limited (Victoria Chisnal) (Victoria Chisnal) - Participant #: 18

Submission Point: V42 - Whole Variation

Submission: In general the submitter supports the thrust of Variation 42 but believes the splitting of properties within the Central Business Area into "primary shopping area" and "central business zone" is neither necessary or effective. The split is considered to have the effect of restricting small shops to one area and large format retail premises into another. This is considered by the submitter to have the result of driving large format retailers out of the area through unavailability of suitable properties, thereby having the effect of causing the opposite outcome to that intended by the Variation.

The submitter believes that the boundaries between these two areas are arbitrary and highlights the Council's Kinross Street car park as an example. The submitter considers that if the car parking areas for the "primary shopping area" are to be provided by the council, then why has the Council's Kinross Street car park not been designated as car park so that parks can be provided for on an ongoing basis.

Relief sought: Remove the provisions for "Primary Shopping Area" as distinct from "Central Business Zone",

thereby allowing for a mix of a large format store containing subleases, concessionaires, licensed areas i.e., small shop in combination with large format store thereby creating a vitality to the city centre.

Marlborough Stadium Trust (Paul Tredinnick) (Paul Tredinnick) - Participant #: 19

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42 in principle stating that it will contribute to a more active and vibrant central business district overall. However, the submitter considers that the area occupied by the Aquatic and stadium operations, including the car parking, should also be included within the 'orange' zone. This is because the current zoning will restrict future development options for stadium services, particularly around parking requirements. The submission states that Stadium 2000 represents a hub of recreational, social, commercial and cultural activity in Blenheim and that it is important the benefits from the use of this site are able to be maximised.

Relief sought: The areas currently occupied by the existing Aquatics and stadium operations including all car parking areas, are included in the 'orange' zoning indicated on the notification.

Celeste & Foster Rudd - Participant #: 20

Submission Point: Maps - Zoning 4, Sheets 5 and 18

Submission: The submitter supports the suggested zone changes in Maps 1 to 9.

Relief sought: Give effect to Variation 42.

Submission Point: O11.3.1.4 - Urban Environments: New objectives and policies and Retail Hierarchy explanation

Submission: The submitter has concerns around the loss of fertile land for primary production, especially for food.

Relief sought: Add at the end of the explanatory text about the 'Retail Hierarchy' the following: "... with regard to the paramount consideration that highly fertile soils will be retained for primary production, particularly foodstuffs for New Zealand population, or export income".

Submission Point: O11.3.1.4.1.3 - Urban Environments: New policy

Submission: The submitter has concerns around the loss of fertile land for primary production, especially for food.

Relief sought: Add "taking care not to waste or destroy highly fertile soils".

Submission Point: O12.2.1.3 - Rural Environments: Issue - Residential, commercial and industrial development

Submission: The wording leaves little doubt that Rural 3 land remains vulnerable. Once destroyed fertile land cannot be reinstated.

Relief sought: Protection of highly fertile soils for primary production, particularly for foodstuffs.

Submission Point: R4.3.1.1 - Rural Zone: Assessment criteria for Commercial Activities

Submission: The submitter notes that it is gratifying to see the bullet point referring to "the effect of the commercial activity on the long term availability of soils for primary productive use".

Relief sought: No specific relief was sought by the submitter but the bullet point referred to in the submission is an existing provision not proposed to be amended by Variation 42.

Submission Point: V42 - Whole Variation

Submission: The submitter generally supports the changes proposed for Volume 1 by Variation 42,

especially those that promote the integrity of the CBZ subject to comments made on specific provisions. The submitter states that the effective collective use of Variations, 42, 49 and 50 should be of value to all of Marlborough and also avoid the unnecessary destruction of prime land by the establishment of one or more business parks in Rural Zones.

Relief sought: Amend Variation 42 as suggested elsewhere in the submission and then give effect to the Variation.

Celeste Rudd - Participant #: 21

Submission Point: V42 - Whole Variation

Submission: The submitter believes Variation 42 is necessary to keep the vibrancy and vitality of the Central Business Zone. There is an issue of concern though and this relates to street side parking meters, which are stated to be a turn-off for shoppers. The submitter states that if a level shopping field is to be established (and this doesn't exist at present) serious consideration should be given to removing parking meters.

Relief sought: 1. Give effect to Variation 42.
2. Serious consideration should be given to removing street side parking meters.

The McKeage No1 Family Trust (Ian McKeage) (Ian McKeage) - Participant #: 22

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42.

Relief sought: No specific relief was sought by the submitter. However, the Council has inferred the submitter's support to be seeking a retention of Variation 42 as notified.

Progressive Enterprises Limited (James Gardner-Hopkins/Kristen Gunnell) (James Gardner-Hopkins/Kristen Gunnell) - Participant #: 23

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42 to the extent it is consistent with a centres-based strategy, achieves sustainable management and is supported by an appropriate section 32 assessment.

The submitter's reasons (to the extent it is consistent with the above), are that the Variation is appropriate and consistent with the purpose, principles and provisions of the RMA and the Proposed Wairau/Awatere Resource Management Plan, in terms of section of section 32 requirements regarding effectiveness and efficiency. The submitter also states that the Variation will enable the efficient use and development of resources within Blenheim and Marlborough, and will enable social economic and cultural well being and will meet the reasonably foreseeable needs of future generations.

Relief sought: 1. That the Variation be adopted subject to any amendments necessary to best achieve:
a) a centres based strategy that enables a level of development commensurate with the needs of the community and the demand for growth in the district;
b) sustainable management; and
c) an appropriate section 32 assessment.
2. Such further or consequential amendments necessary to give effect to this submission.

N & O Croad (S Wilkes) - Participant #: 24

Submission Point: Maps - Zoning 4, Sheets 5 and 18

Submission: The submitter supports Variation 42 subject to the rectification of some existing zoning anomalies. The Variation is considered to go some way toward providing for the growth and future expansion of the Blenheim Central Business District.

The zoning anomalies are adjacent to the existing CBD and are currently zoned residential but are actually commercial sites. The two sites referred to are on Redwood Street and haven't been used for residential purposes for a number of years and are unlikely to return to a residential use. The submitter considers the zoning should reflect the anticipated site usage.

- Relief sought:**
1. Lot 1 DP 11930 and Lot 8 DP 1179 be included in the proposed plan change and that the zoning of these two lots be Central Business Zone to be consistent with the adjacent zoning to the north.
 2. Should the Central Business to the north also change (as the result of this proposed variation) to Central Business Zone/Primary Shopping Area, then the two lots in 1. above should also be changed accordingly.
 3. Any consequential amendments to the Plan's objectives and policies that are required in order to give effect to the submission should also be made.

Sue Hutchinson - Participant #: 25

Submission Point: V42 - Whole Variation

Submission: The submitter conditionally gives approval to rezone land outside the existing urban area subject to conditions regarding historic or special buildings, large and/or historic trees and building design.

- Relief sought:** Rezone land outside the existing urban area subject to the following conditions:
- All historic or special buildings of interest are protected and saved.
 - All large and/or historic trees are protected.
 - Any new buildings erected are of attractive design using quality finishes and surrounded with trees and/or landscaping.

Axis Productions Limited (Sue & Nigel Hutchinson) (Sue & Nigel Hutchinson) - Participant #: 26

Submission Point: V42 - Whole Variation

Submission: The submitter gives approval to rezone land outside the existing urban area subject to conditions regarding historic or special buildings, large and/or historic trees and building design.

- Relief sought:** Rezone land outside the existing urban area on the condition that:
- All historic, notable and special buildings of interest are protected and saved within the new zone.
 - All large, notable and/or historic trees are protected.
 - All new buildings are made of attractive and quality finishes using the very best designs and all buildings to be surrounded by trees and/or landscaping - maintained gardening by occupiers or buildings to a high standard.

C M & J Keown - Participant #: 27

Submission Point: V42 - Whole Variation

Submission: The submitters' support Variation 42 but has raised a concern with vehicle access.

- Relief sought:**
1. No specific relief was sought by the submitters. However, the Council has inferred the submitters' support to be seeking a retention of Variation 42 as notified; and
 2. That total vehicle access be maintained/retained to both the Central Business Zone and to the newly described Primary Shopping Area.

NZ AA Marlborough District (Kelston Swete) (Kelston Swete) - Participant #: 28

Submission Point: V42 - Whole Variation

Submission: Recent and proposed development could compromise the longer term integrity of the CBD and result in further fragmentation of mercantile outlets in Blenheim. This could lead to excessive and/or unplanned pressure on the roading hierarchy.

- Relief sought:**
1. Proposed Variation 42 must be addressed by the Marlborough Roads study on the Wairau Plains and Blenheim, and preferably aligned with the findings and recommendations of the study.
 2. There needs to be a strong policy direction for development which utilises current and planned infrastructure.
 3. Any development which accelerates planned upgrading of facilities, or requires new/upgraded infrastructure, must be met by the developer.

Redwood Development Limited (Paul Ham) (Paul Ham) - Participant #: 29

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42 with some qualification regarding traffic flow and the Redwoodtown Neighbourhood Business Zone.

- Relief sought:**
1. No specific relief was sought by the submitter. However, the Council has inferred the submitter's support to be seeking a retention of Variation 42 as notified; and
 2. Consideration should be given to upgrading Henry Street, Hodson Street and Francis Street, along with an upgrade of the roundabout at the intersection of Scott, Seymour and Francis Streets to improve traffic flow; and
 3. Consideration should be given to expanding the Redwoodtown Neighbourhood Business Zone to cater for residential growth in the area.

Marlborough Civic Theatre Trust (Andrew Scott) (Andrew Scott) - Participant #: 30

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42 as it considers expansion of the Central Business Zone will lead to developments that will enhance and add to the vitality of Blenheim's town centre, and add strength to the social and cultural wellbeing for Blenheim and Marlborough.

- Relief sought:** No specific relief was sought by the submitter. However, the Council has inferred the submitter's support to be seeking a retention of Variation 42 as notified.

Jean Wilson - Participant #: 31

Submission Point: Maps - Zoning 4, Sheets 5 and 18

Submission: Variation 42 is supported by the submitter but she seeks that her property at 13 Kinross Street is also included within it. The submitter considers that by having this property as retail space new opportunities will be created in the Central Business Zone. More land would be available in the redevelopment of the town centre and would link up with retail areas to the east and west of Lot 4.

The submitter also considers that the car park frontage on Scott Street should be turned in to a shopping area with small boutique shops. Access to the car park could be over the submitters right of way or over Fourteenth Lane.

- Relief sought:**
1. No specific relief was sought by the submitter. However, the Council has inferred the submitter's support to be seeking a retention of Variation 42 as notified; and
 2. Inclusion of Lot 4 DP 2590 - Right of Way over Part Lots 1 and 2, namely 13 Kinross Street, Blenheim in the Variation and that this lot be considered as retail space.
 3. That the car park frontage on Scott Street be turned into shopping area.

Foodstuffs (South Island) Limited (Rebecca Parish) (Rebecca Parish) - Participant #: 32

Submission Point: V42 - Whole Variation

Submission: Foodstuffs opposes the overall philosophy of Variation 42 stating that neither the Proposed Plan, nor Variation 42, make any proper provision for large format retailing. This will result in the submitters view in significant leakage to other districts.

Foodstuffs state that Variation 42 doesn't solve the issue of where large format retailers can locate within the CBD. The large size of operators such as a Bunnings or a Pak'nSave would require approximately a 2 hectare land holding. Forcing large format retailers into purchasing large holdings of brown field sites in the CBD will lead to a dominance both visually and from a traffic perspective in the town centre. Foodstuffs consider this won't promote the vibrancy and vitality sought for the CBD area by the Council.

Foodstuffs also consider that:

- The variation's provisions are very prescriptive and that larger retailers will find it hard to secure sites.
- The hierarchy of zoning ignores the demand for large scale retail development over 1500m².
- A typical town centre is smaller in retail scale, has more café/restaurants and walking precincts and is not suitable for large format retailing. The Council should be focussing on the mix of uses to ensure continued viability and vibrancy of the town centre.
- Rezoning of Council owned land in order to publicly drive retail investment stating that it is contrary to the RMA and is ultra vires, unfair and unreasonable.
- It is potentially ultra vires for the Variation to recognise that where there is no space or appropriate sites within the CBZ, consideration will be given to greenfields sites because there is no assessment criteria for what is considered an appropriate site or where no space is provided.

Foodstuff supports Option 4 of those considered by the Council for retail rezoning in the Blenheim township and cites the Outer Limits development as providing the best option for large format retailing without detracting from the vibrancy and vitality of the CBD.

- Relief sought:**
1. That Council reject Variation 42 in its entirety, and instead investigate a new variation which indicates the ability to provide for a Retail Park to the Marlborough community, such as the Outer Limits development, suitable and specific to large format retailing, which shall include a Blenheim Pak'nSave.
 2. That the Council recognises the mix of different uses in a town centre, which includes small scale retailing, service activities, food and entertainment. Residential activities should also be encouraged in the town centre to create 24 hour vibrancy. Large format retailing should be encouraged to locate on the Outer Limits site.

Submission Point: O11.3.1.3 - Urban Environments: New issue

Submission: The issue favours the commercial dominance of the Central Business Zone (even calling it a CBZ as opposed to a town centre suggests it is all about business) but neglects to recognise the attendant issue of urban quality that can be seriously affected by the type and scale of development that occurs there.

Relief sought: Add a new issue as follows:
"Managing the risk to the quality of the Central Business Zone urban environment as a social and cultural place from inappropriate scale and type of larger format commercial activities.
- The need to maintain public accessibility to the Central Business Zone through a parking strategy aimed at appropriately located facilities that enhance the pedestrian foot traffic on shopping streets.
- The need to manage the shopping street environment to prevent the dominance of large format retail activities and lack of active edges to streets.
- The need to address the degree to which large format activity can be comfortably provided for within the Central Business Zone without affecting the viability of a specialised retail centre.

Submission Point: O11.3.1.4 - Urban Environments: New objectives and policies and Retail Hierarchy explanation

Submission:

Relief sought: Add a new objective and policies as follows, in conjunction with the submission seeking a new issue:

Objective

"Enhancement of the urban quality of the town centre in a way which balances retail aspirations with its social and cultural function as the heart of the district."

Policies

"Require an urban design strategy that addresses urban quality including urban form, growth, mixed uses, transport, accessibility, scale of uses, open space, climatic conditions.

Require that the town centre is one of the places that commercial activity is appropriate and neighbourhood centres are important as localised neighbourhood hearts, and that larger commercial/light industrial locations can provide a balance to the demand for larger format activities in the district."

Submission Point: O11.3.1.4.2 - Urban Environments: New objective and explanation

Submission:

Relief sought: Amend the objective as follows:
"Infill and redevelopment of the Central Business Zone to enable growth and change over time and in accordance with the strategy to maintain a high quality of town centre urban environment."

Submission Point: O11.3.1.4.2.1 - Urban Environments: New policy

Submission:

Relief sought: 1. Amend Policy 2.1 as follows:
"Encourage infill and redevelopment in the Central Business Zone where it satisfies the urban design strategy for the town centre to create a vibrant commercial sustainable and attractive town centre."

2. Add a new policy as follows:

"Encourage the spatial servicing of the district's commercial needs to reflect the catchments serviced by smaller neighbourhood centres and the demand for larger format activities that may not be appropriate in the Central Business Zone due to their effects on town centre

quality."

Submission Point: V42 - Whole Variation

Submission: J & RK de Castro Limited supports the Council's stated objective of maintaining the vibrancy of the Blenheim centre but is concerned that the policies, rules and methods in Variation 42 are not the most appropriate way to achieve the objectives and that the costs and benefits of the proposed approach and alternatives have not been adequately considered in terms of section 32 of the RMA.

The submitter states that Blenheim needs to provide for true large format retail and that while some of this can be accommodated in or near the town centre, forcing all of it into the same area as small retailers could have an impact on town character and amenity.

Other issues highlighted by the submitter of concern are as follows:

- The retail hierarchy proposed is considered to be flawed as not all retail activity should be focussed in the CBZ. An urban area needs to have a spatial distribution of retail activities with some in the town centre and others in satellite centres.
- Differences in floor space value and efficiency between small format retail and large format retail have not been taken into account.
- Car park numbers are decreased in and around the town centre by the Variation but allowing increases in retailing will generate traffic in that area.
- It is unclear how traffic associated with further retail development will be managed.
- The Variation doesn't set out the Council's strategy for the town centre.
- The Council's involvement as owner of some land areas for development and whether it is fair and reasonable for the Council to be involved in this.
- Adding the Primary Shopping Area concept is confusing when there is already a CBZ. The difference between the two areas is unclear either in terms of location or in terms of objectives, policies and rules. Additionally rezoning some existing car parks to Primary Shopping Area appears to be in direct conflict with existing Policy 11.3.1.2.2.7 listing named car parks to be retained or enhanced.

Relief sought: 1. That Variation 42 be either put on hold or withdrawn until a thorough town centre and retail services study has been completed, including a full analysis of costs, benefits and alternatives under section 32 of the RMA. The study should consider the provision for retail space in Blenheim on a holistic level, rather than looking at the town centre in isolation. The study should have as one of its outcomes a strategy for growth and change to address the nature of the conditions that make the town centre sustainable (economically, environmentally and socially) into the future.

OR

2. Alternatively if that relief is not granted, the submitter seeks amendments to the policies, rules and methods outlined elsewhere in the submission and any further or amended relief necessary to address the points raised in the submission.

Outer Limits Limited (Hugh Briggs) (Hugh Briggs) - Participant #: 34

Submission Point: Maps - Zoning 4, Sheets 5 and 18

Submission:

Relief sought: 1. Amend Maps to the reduced residential areas as shown in Appendix B of the submission.
2. Add new area on the Maps being the proposed new Business (Large Format Retail) Zone on those properties as shown on the plan attached to Appendix B of the submission.

Submission Point: O11.3 - Urban Environments: Business Area

Submission: Rezoning for large format retail needs to take place immediately to meet an urgent demand that has been clearly demonstrated. A zone is more appropriate than allowing these activities to establish by way of ad hoc resource consent applications.

Relief sought: Delete the words "... but these should always remain in a secondary position to the primary function of the Blenheim town centre" and replace them with the following:

"Provision for well planned large format retail developments will be made in appropriate "out of centre" locations.

A new Business (LFR) Zone to accommodate the demand for a range of size and scale of large format retail (LFR) activities, and for other associated activities suitable in such locations, will be applied to appropriately located land at Westwood near Springlands."

Submission Point: O11.3.1.3 - Urban Environments: New issue

Submission: It is important to promote the 'primacy' of the CBD as the retail centre but only for the most appropriate forms of retail development. LFR is not suitable in or close to the CBD because of different site needs and characteristics.

Relief sought: 1. Retain the first and second bullet points as they are.

2. Deleted the third, fourth and fifth bullet points and replace them as follows:

"* Any retail development within the CBZ shall ensure it meets the urban design criteria established in the Town Centre Urban Design Plan with respect to building facades and that parking is provided without any conflict with pedestrian circulation within both the CBZ and the PSA.

* Any retail expansion in the Neighbourhood Business Zone to be limited to smaller scale, local service retail activity, with a restriction on any LFR developments to ensure maintenance of the sensitive surrounding amenity and local service function.

* The unmet demand for large format retail activity which is inappropriate to locate in the CBZ to be accommodated in appropriate locations by way of new zoning."

Submission Point: O11.3.1.4 - Urban Environments: New objectives and policies and Retail Hierarchy explanation

Submission: The proposed retail hierarchy is too prescriptive and unnecessarily protective of the Central Business Zone and the Primary Shopping Area. The mechanism chosen is not the appropriate one in RMA terms. It is not necessary and unlawful to direct and place limits on large format retail developments to avoid trade competition.

Relief sought: Delete the statement on Retail Hierarchy and replace it with the following:
"Council intends to recognise the evolving needs and patterns of commercial activity within Marlborough District, and in Blenheim in particular, by primarily focussing on maintaining the vibrancy and vitality of the Blenheim town centre, but also by enabling other new forms of retail developments, such as the large format retail outlets, to establish in appropriate locations.

In doing so, Council will make the CBD more attractive for new development and site redevelopment by a concerted and coordinated enhancement programme in the CBD. The initial part of this will be the immediate preparation of a Blenheim Town Centre Urban Design Plan which will address the issues of traffic circulation, public and private parking areas, service access, building design, street amenities.

Another area where new retail activity can be accommodated is the Neighbourhood Business Zone, which is designed primarily to serve the local convenience of the surrounding community. Any increase in scale of the NBZ shall ensure that the sensitive adjacent residential environments are protected, and that any proposed retail development shall not compromise the vitality of the CBD.

For more extensive retail developments, such as the large format retail outlets seeking sites in Blenheim, a new Business (LFR) Zone (BLFRZ) is to be established, located on the urban-rural fringe on currently Rural 3 zoned land. This shall only be developed where it can be demonstrated that there will not be significant adverse amenity or economic distributional effects on the CBZ or NBZ."

Submission Point: O11.3.1.4.1 - Urban Environments: New objective

Submission: The proposed retail hierarchy is too prescriptive and unnecessarily protective of the Central Business Zone and the Primary Shopping Area. The mechanism chosen is not the appropriate one in RMA terms. It is not necessary and unlawful to direct and place limits on large format retail developments to avoid trade competition.

Relief sought: Delete Objective 1 and replace it with the following:
"Establishment of appropriate mechanisms to ensure that commercial (retail) development can establish in appropriate locations and zones."

Submission Point: O11.3.1.4.1.1 - Urban Environments: New policy

Submission: The proposed retail hierarchy is too prescriptive and unnecessarily protective of the Central Business Zone and the Primary Shopping Area. The mechanism chosen is not the appropriate one in RMA terms. It is not necessary and unlawful to direct and place limits on large format retail developments to avoid trade competition.

Relief sought: Delete Policy 1.1 and replace it with the following:
"Encourage only appropriate forms of retail activity in the Primary Shopping Area and Central Business Zone, in accordance with the design guidelines provided for in the Town Centre Urban Design Plan."

Submission Point: O11.3.1.4.1.2 - Urban Environments: New policy

Submission: The proposed retail hierarchy is too prescriptive and unnecessarily protective of the Central Business Zone and the Primary Shopping Area. The mechanism chosen is not the appropriate one in RMA terms. It is not necessary and unlawful to direct and place limits on large format retail developments to avoid trade competition.

Relief sought: Delete Policy 1.2 and replace it with the following:
"Provide appropriate locations for LFR developments in new zones."

Submission Point: O11.3.1.4.1.3 - Urban Environments: New policy

Submission: The proposed retail hierarchy is too prescriptive and unnecessarily protective of the Central Business Zone and the Primary Shopping Area. The mechanism chosen is not the appropriate one in RMA terms. It is not necessary and unlawful to direct and place limits on large format retail developments to avoid trade competition.

Relief sought: Delete Policy 1.3 and replace it with the following:
"Limit the scale and form of new retail activity in the Neighbourhood Business Zone."

Submission Point: O11.3.1.4.3 - Urban Environments: New objective

Submission:

Relief sought: Retain Objective 3 as it is.

Submission Point: O11.3.1.4.3.1 - Urban Environments: New policy

Submission: The policy is too negatively focused without any indication of why or how.

Relief sought: Delete Policy 3.1 and replace it with the following:
"Develop a Town Centre Urban Design Plan to guide appropriate forms of development within the CBZ and PSA to ensure high standards of building design, strong pedestrian linkages, attractive streets, improved traffic circulation, good parking areas, accessible servicing."

Submission Point: O11.3.1.4.3.2 - Urban Environments: New policy

Submission: The policy is too prescriptive without any justification.

Relief sought: Delete Policy 3.2 and replace it with the following:
"Encourage suitable forms of retail, commercial, cultural and recreational activity into the CBZ and PSA."

Submission Point: O11.3.1.5 - Urban Environments: Methods of Implementation

Submission: For the Council to achieve its aims of enhancing the CBD there needs to be a more strategic look at the CBD, working closely with stakeholders.

Relief sought: Council Activities Method
1. Retain the first paragraph as it is.

2. Delete the remaining paragraphs and replace with them the following:
"Council will immediately prepare a Town Centre Urban Design Plan for the CBD and immediately surrounding areas to the CBZ and PSA, to be undertaken with the business organisations and landowners. This will guide the most appropriate form of development and redevelopment on all sites within the PSA and the CBZ."

It will also include a comprehensive parking strategy to ensure that all current sites are being appropriately used within the overall Town Centre Plan strategy, and that the traffic circulation patterns through and around the Town Centre is improved. This will include a full review of the potential of the parking sites for any more intensive development, and whether other sites could be more appropriately used for parking instead."

Submission Point: O12.2.1.3 - Rural Environments: Issue - Residential, commercial and industrial development

Submission: The wording should indicate that a new Business Zone will be allocated to the appropriate sites in a planned manner, as opposed to developments being accommodated by way of ad hoc resource consents.

Relief sought: Delete the proposed paragraph and replace it with the following:
"It has been established in the Business Areas section, in the Urban Environments chapter, that new forms of retail activity, such as the larger format retail (LFR) outlets, that cannot and indeed should not be accommodated in the Central Business Zone will be provided for in a new Business (LFR) Zone that will be allocated to sites within the urban-rural fringe on land currently zoned Rural 3."

Submission Point: V42 - Whole Variation

Submission: The submitter supports the principle of revitalisation of the Central Business District (CBD) but states it is not achieved by the 'hierarchy' approach proposed for large retail format (LFR) in Variation 42. Conflict arises between how LFR developments are provided for in core and fringe areas and the maintenance and enhancement of the visual and pedestrian amenity of the CBD. There are also unrealistic and uneconomic options in developing car parking areas for new retail buildings.

The submitter states there needs to be a CBD town centre strategy and urban design guidelines developed first to ensure that revitalisation of the CBD is achieved.

Overall the submitter states that inadequate provision has been made for LFR operations in appropriate locations and there is a need for a specific zone to accommodate them outside of the existing CBD or Neighbourhood Business Zones.

Relief sought: 1. Amend Variation 42 as set out in the remainder of the submission; and
2. Add a new Business (Large Format Retail) Zone as was proposed as part of the initial work undertaken with the Council in the development of Variation 41.
**The Zone provisions proposed by the submitter are attached as Appendix A to the submission and are not reproduced here.

Bryan K & Elaine W Lawless - Participant #: 35

Submission Point: V42 - Whole Variation

Submission: The submitters believe that the maintenance and development of the Central Business Zone of Blenheim is vital to the future to Marlborough as a viable district. Besides the areas proposed to be rezoned for retail development, the submitters consider that several areas could be redeveloped for modern retailing.

Relief sought: In any future substantial redevelopments of sites within the Central Business Zone, the Council should require either half below ground level parking be provided, or that overhead parking be provided in rebuilding.

Nigel Hutchinson - Participant #: 37

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42.

Relief sought: No specific relief was sought by the submitter. However, the Council has inferred the submitter's support to be seeking a retention of Variation 42 as notified.

L F & J M McKendry (Leo McKendry) - Participant #: 38

Submission Point: O11.3.1.2.2 - Urban Environments: Explanatory text under Objective 2

Submission: The use of the word 'compact' is too restrictive.

Relief sought: Delete the word 'compact' in the first line.

Submission Point: O11.3.1.3 - Urban Environments: New issue

Submission: The fourth bullet point needs to be clarified.

Relief sought: Amend the fourth bullet point as follows:
"The pressure for NEW sites outside ... function of the EXISTING Neighbourhood Business Zone."

Submission Point: O11.3.1.4.1.1 - Urban Environments: New policy

Submission: Including reference to the roading network in the policy adds natural boundaries to 'managing location of commercial activities'.

Relief sought: Add "and the roading network".

Submission Point: O11.3.1.5 - Urban Environments: Methods of Implementation

Submission:

Relief sought: Rules Method
Rules allowing for "retailing to be a permitted activity anywhere with the Wider Central Business Zone", be implemented.

Transport Method

The Regional Land Transport Strategy be amended to provide "for a ring or principle roading network around the Central Business District".

Submission Point: V42 - Whole Variation

Submission: The submitter compliments the Council on its initiatives to address the need to strengthen the central business area of Blenheim and believes it could be improved by adopting a more aggressive approach while at the same time recognising the natural boundaries of the existing roading structure within the zoned area.

The creation of the Primary Shopping Area in the Railway station site is opposed.

The inclusion of the Council's Main Administration Buildings, the Millennium Gallery, plus the Combined Club's Area in the Primary Shopping Zone are opposed because the activities on these sites have no relation to primary shopping.

Relief sought: 1. A new alternative ring road of Redwood Street, Francis Street, Seymour Street and Alfred Street should be created.

2. Council should also take this opportunity to prepare for long-term town expansion by dedicating setbacks for road widening along Francis Street from Scott Street to the Catholic Church and Hobson Street to enable the ring road to move from Seymour Street to Henry Street at sometime in the future.

3. All of the land within the extended ring road (via Henry Street) not already zoned Commercial or Retail, be zoned Commercial with Retail a permitted activity. Seymour Square and the block bounded by High, Seymour, Charles and Henry Street excluded.

4. The Scott Street car park and other Council owned property facing Kinross Street,

including the pools and stadium should be subject to a feasibility study to determine the need for them remaining in what is a desirable and valuable retail/commercial site.

5. A suggested alternative is to resite the pool and stadium on a 'green field' site such as the area of land next to the old dump entrance in Taylor Pass Road.

6. Queen Street to become a parking precinct with diagonal parking on both sides and one way traffic from George Street to High Street and that Arthur Street, between Seymour and Queen Streets, be closed to traffic and a small paved pedestrian open area created.

7. What happens if the Council's car parks are sold needs to be resolved before the final document is presented to the Council.

8. The Railway Station site shown to be a Primary Shopping Area should instead be designated as a Transport Zone with provision for restricted retail and commercial use pertinent to such a zone.

9. The Council's Main Administration Buildings, the Millennium Gallery, plus the Combined Club's area should be zoned commercial with retail a permitted activity.

R J Culbert - Participant #: 39

Submission Point: V42 - Whole Variation

Submission: The submitter opposes Variation 42.

Relief sought: Detailed parking and traffic studies need to be undertaken before the effects of Variation 42 can be properly considered.

Maxwell Kenneth Joseph & Patricia Marianne Currie - Participant #: 40

Submission Point: V42 - Whole Variation

Submission: The submitters' support Variation 42.

Relief sought: No specific relief was sought by the submitters. However, the Council has inferred the submitters' support to be seeking a retention of Variation 42 as notified.

M R Hamilton - Participant #: 41

Submission Point: V42 - Whole Variation

Submission:

Relief sought: 1. The Central Business Zone should be extended to allow multi storied and sized buildings and also to allow for bigger traffic access.

2. Allow for multi storied car parking as the Council is proposing for Wynen Street (although not enough car parks are being allowed for).

3. Businesses should have to provide adequate car parking for their clients and staff.

Blenheim Workingmens Club (Lee Davis) (Lee Davis) - Participant #: 42

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42 with particular emphasis to the Blenheim Working Men's Club property in Wynen Street and the land bounded by the Hutchinson Street, Alfred Street, Russell Terrace and the Taylor River.

Relief sought: No specific relief was sought by the submitter. However, the Council has inferred the submitter's support to be seeking a retention of Variation 42 as notified.

Option 5 Incorporated (Robin Sutherland) (Robin Sutherland) - Participant #: 43

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42 to the extent it is consistent with a centres-based strategy, achieves sustainable management and is supported by an appropriate section 32 assessment.

The submitter's reasons (to the extent it is consistent with the above), are that the Variation is appropriate and consistent with the purpose, principles and provisions of the RMA and the Proposed Wairau/Awatere Resource Management Plan, in terms of section of section 32 requirements regarding effectiveness and efficiency. The submitter also states that the Variation will enable the efficient use and development of resources within Blenheim and Marlborough, and will enable social economic and cultural well being and will meet the reasonably foreseeable needs of future generations.

Relief sought: 1. That the Variation be adopted subject to any amendments necessary to best achieve:
a) a centres based strategy that enables a level of development commensurate with the needs of the community and the demand for growth in the district;
b) sustainable management; and
c) an appropriate section 32 assessment.

2. Such further or consequential amendments necessary to give effect to this submission.

Rangitane O Wairau (Sandra Evers) (Sandra Evers) - Participant #: 44

Submission Point: V42 - Whole Variation

Submission: Variation 42 is supported by the submitter, with particular reference to the inclusion within the Central Business District, of the land adjacent to the Railway yards and Horton Streets.

Relief sought: No specific relief was sought by the submitter. However, the Council has inferred the submitter's support to be seeking a retention of Variation 42 as notified, particularly the area of land included in the Central Business District adjacent to the Railway yards and Horton Streets.

Strategic Property Group Limited (Steve Wilkes) (Steve Wilkes) - Participant #: 45

Submission Point: V42 - Whole Variation

Submission: The submitter supports Variation 42 subject to the rectification of some existing zoning anomalies. The Variation is considered to go some way toward providing for the growth and future expansion of the Blenheim Central Business District.

Lots 1 and 2 DP 7607 and Pt Sec SO2085 are currently Central Business Zone. The immediately adjacent lots to the east are zoned Conservation as these form part of the Taylor River Reserve, while those lots immediately to the west are Central Business Zone/Primary Shopping Area. The submitter considers it is anomalous for the identified lots to differ from those immediately to the west. Additionally Lot 1 DP 7607 is zoned with a flood hazard but the title is outside of the Taylor River floodplain.

The submitter considers the zoning should reflect the anticipated site usage.

- Relief sought:**
1. That Lots 1 and 2 DP 7607 and Pt Sec SO2085 be included in the proposed plan change and that the zoning of these three lots should be Central Business Zone/Primary Shopping Area to be consistent with the adjacent zoning to the west.
 2. That the flood hazard zoning be removed from Lot 1 DP 7607.
 3. Any consequential amendments to the Plan's objectives and policies that are required in order to give effect to this submission should also be made.