

To: Hearing Commissioners – Hutt City Council  
From: Ashleigh Wharam – Barker & Associates Limited  
Date: 08/06/2026  
Re: Hearing Stream 2

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In response to questions raised during the Hearing on 27 May 2026, I was asked to provide clarification or further response on the following matters:

- Consider the anticipated activity status for a wholesale activity in the General Industrial Zone.
- Further detail relating to Paragraph 9.8 of my evidence relating to active frontages and existing development.

## Wholesale Activities

During the hearing, there was some discussion regarding the activity status that would apply to wholesale activities, using Gilmours by way of example, in the General Industrial Zone if these were not specifically provided for by the District Plan. I agreed to review the plan and confirm my view on the activity status.

In preparing my evidence, I considered that an application for a Gilmours store could be sought under GIZ-R10 'Grocery stores and supermarkets' and/or GIZ/R15 'Trade supply retail activities', for lack of a more specific definition. This would be a restricted discretionary activity (assuming the 200m<sup>2</sup> GFA limit would not be achieved). During the hearing it was suggested that such an activity might instead fall under GIZ-R16 'Commercial activities not otherwise provided for', being a non-complying activity; or GIZ-R17 Other activities not otherwise provided for, being a discretionary activity.

In my view, the differing interpretations advanced during the hearing illustrate the uncertainty identified in paragraphs 10.16 – 10.18 of my evidence. The activity status of a wholesale operation such as Gilmours should not depend on fine-grained judgements as to whether it is best characterised as a supermarket, trade supply retail, commercial activity, or another activity altogether. This is particularly relevant given the disparity between the potential activity status.

This discussion reinforces the need to expressly define and provide for wholesale activities as a permitted activity within the GIZ, as stated in paragraph 10.18 of my evidence.

For ease of reference, I include the definition requested in Foodstuffs North Islands submission below:

Wholesale activities:

*means a business engaged in the storage and distribution of goods to businesses (including retail activities) and institutional customers.*

## Active Frontages – Buildings and Structures

In my evidence, I stated that I consider that the provisions do not adequately recognise the constraints of existing development, nor distinguish between minor changes and comprehensive redevelopment (at Paragraph 9.2). Further, although refinements partially address the issues raised in Foodstuffs submission,

these do not fully address the broader issue that the standards are framed around redevelopment outcomes and are difficult to achieve in the context of existing development (refer Paragraph 9.5).

At Paragraph 9.8, I indicate that there are two appropriate pathways that could better ensure that the provisions function appropriately:

- a) Amend Rule MCZ-R4/CCZ-R4 (and equivalent rules) so that additions and alterations to existing buildings are not required to comply with the full suite of Active Street Frontage standards; or
- b) Amend the relevant standards to clearly limit their application to new buildings and substantive redevelopment of a site, rather than applying equally to minor or incremental changes.

During the Hearing, it was requested that I provide ideal or suggested wording to achieve the above.

Rule CCZ-R4 (and equivalent rules)

A change to Rule CCZ-R4 would require that additions and alterations to existing buildings be exempt from compliance with the full suite of Active Street Frontage standards. In considering how such an amendment might be implemented, I have reviewed both the notified provisions and the amendments recommended by the s42A Reporting Officer.

Having done so, I consider that the issue is more appropriately addressed through amendments to the Active Street Frontage standards themselves (CCZ-S4, CCZ-S5, CCZ-S6, CCZ-S7, and equivalent), as per ‘b’ above. This would provide a more direct and efficient means of ensuring that the standards apply to new buildings and substantive redevelopment, without inadvertently capturing minor additions and alterations to existing development.

Standard CCZ-S4 (and equivalent)

Suggested amendments below:

CCZ-S4	Active frontages – Buildings and structures
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On any site subject to an Active Street Frontage Overlay, or in the Riverbank Precinct and with a riverbank frontage:

1. **For any new building or redevelopment of the site, there** ~~There~~ must be a building or abutting group of buildings built to the front boundary, to the full width of the Active Street Frontage Overlay, and to any riverbank frontages, to a minimum height of 4m above:
  - a. Ground level at the boundary, for an Active Street Frontage Overlay, or
  - b. The height of the stopbank, for a riverbank frontage.
2. Alternatively, the **new** buildings or parts of buildings may be set back from the front boundary or riverbank frontage by up to 2m where:
  - a. The intervening space is paved pedestrian space continuous with the footpath and open to the public, or
  - b. The intervening space is a seating or dining area, or
  - c. The intervening space is an entrance porch, or

- d. The intervening space is visitor cycle or micromobility parking, or
    - e. The intervening space is used for entrance stairs or pedestrian ramps.
3. The requirement in 1. above does not apply at all on sections of the front boundary or riverbank frontage:
  - a. Where compliance would encroach within the dripline of a notable tree, or
  - b. Where necessary to comply with CCZ-S3: Setbacks – adjoining zones, or
  - c. On the Active Street Frontage Overlay C, to the degree necessary to provide for a vehicle crossing, manoeuvring area, and visibility splays (but not parking spaces or loading spaces):
    - i. Where no other frontage not in an Active Street Frontage Overlay is available,
    - ii. With a traffic lane width of no more than 6m, and that complies with:
    - iii. TR-S5: Vehicle crossings – Number, location and width,
    - iv. TR-S6: Vehicle crossings – Separation distances and design,
    - v. TR-S7: Driveways,
    - vi. TR-S8: Design requirements for motor vehicle parking, circulation, and manoeuvring,
    - vii. TR-S9: Loading and unloading - Non-residential, and
    - viii. TR-S10: Loading and unloading – Residential, and
  - d. Within the Riverbank Precinct only, for a width of up to 6m where a public access is provided between a road boundary and the riverbank frontage.
4. **The Any new** buildings must not have a featureless façade on the front boundary or riverbank frontage of more than 3 metres in width at any part of the building between 0.5m and 2.5m in height above footpath level.
5. On an Active Street Frontage Overlay A or B frontage, or on a riverbank frontage, the buildings must provide a minimum of 60% of continuous display windows or transparent glazing along the width of the ground floor at between 0.5m and 2m in height above footpath level.
6. On an Active Street Frontage Overlay C frontage, the buildings must provide a minimum of 30% of continuous display windows or transparent glazing along the width of the ground floor at between 0.5m and 2m in height above footpath level.
7. **The Any new** building must have the principal public entrance on:
  - a. An Active Street Frontage Overlay A frontage, if any,
  - b. Otherwise, an Active Street Frontage Overlay B frontage, if any,
  - c. Otherwise, an Active Street Frontage Overlay C frontage.
8. However, where a building in the Riverbank Precinct abuts a riverbank frontage it:
  - a. May instead have the principal public entrance on the riverbank frontage, and
  - b. Must have a public entrance, whether principal or not, on both the front boundary and

the riverbank frontage.

9. Roller shutter doors, security grilles, screens or similar structures fitted to the facade of any building on the front boundary must be at least 50% visually transparent.

CCZ-S5

Active frontages – Required verandahs

1. Where any building is constructed, ~~added to, or altered on~~ a site with a frontage in the Active Street Frontage Overlay A or B, it must provide a verandah or canopy in legal road along the length of the Active Street Frontage Overlay that:
  - a. Extends for the full width of the site frontage covered by the Active Street Frontage Overlay, or
  - b. Extends outwards from the front of the building to the front boundary and then into the road for at least 3 metres, or to the far side of the kerbing less 500mm, whichever is the lesser, and
  - c. Provides continuous shelter with any adjoining verandah or pedestrian shelter.
2. But no verandah or canopy shall be required:
  - a. From any site containing a listed heritage item, except where there was a verandah or canopy on 6 February 2025, or
  - b. On any portion of a frontage where the required verandah or canopy, as seen in plan, would encroach on the dripline of a notable tree or street tree, or
  - c. On any portion of a frontage with an existing vehicle crossing.