

Response ID ANON-URZ4-5FGA-R

Submitted to Fast-track approval applications  
Submitted on 2024-05-03 13:11:09

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:  
General Distributors Limited (being a wholly owned subsidiary of Woolworths New Zealand Limited)

2 Contact person

Contact person name:  
Daniel Shao

3 What is your job title

Job title:  
Development Manager

4 What is your contact email address?

Email:  
s 9(2)(a)

5 What is your phone number?

Phone number:  
s 9(2)(a)

6 What is your postal address?

Postal address:  
  
80 Favona Road, Favona, Auckland 2024

7 Is your address for service different from your postal address?

Yes  
  
Organisation:  
Lane Neave  
  
Contact person:  
Joshua Leckie

Phone number:  
s 9(2)(a)  
  
Email address:  
joshua.leckie@laneneave.co.nz

Job title:  
Partner

Please enter your service address:  
  
PO Box 701, Queenstown 9348

Section 1: Project location

Site address or location

Add the address or describe the location:

472 – 494 Madras Street, St Albans, Christchurch the location and extent of General Distributors Limited's land holdings is shown in the attached plan.

File upload:

Appendix 1 Map\_ Site Location (Attached in Section 1).pdf was uploaded

Upload file here:

Appendix 3 - Architect Concept.pdf was uploaded

Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

Appendix 2\_ Records of Title (Combined).pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

General Distributors Limited (GDL)

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

GDL owns all 11 titles with a combined area of approx. 2.06ha. GDL will retain and utilise 1.664ha of the landholding for the proposed development. The surplus land owned by GDL but not included in this application will be developed by others and is not subject to this fast track application.

## Section 2: Project details

What is the project name?

Please write your answer here:

Woolworths St Albans Commercial Centre

What is the project summary?

Please write your answer here:

The proposal is for the development of a large brownfield site in an established part of Christchurch into a supermarket-anchored retail and commercial development, with a publicly accessible plaza/pocket park, and associated parking and landscaping. The wider area has experienced significant residential growth through infill and redevelopment in recent years and has strong demand for a supermarket, retail and housing of the nature proposed to serve the surrounding catchment.

What are the project details?

Please write your answer here:

The project proposes a development comprising of:

- approx. 3,900m<sup>2</sup> Woolworths New Zealand Limited (WWNZ) supermarket;
- approx. 1,400m<sup>2</sup> of additional retail and commercial space; and
- 13 new dwellings.

The proposed development site is one of the largest brownfield development opportunities north of central Christchurch. It is within walking distance to Christchurch CBD and makes up a significant portion of a large urban block in St Albans which has been vacant for over two decades. Over this time various development schemes have been proposed but none have materialised.

Over time land ownership of the project site became fragmented and developments have progressed in a piecemeal manner rendering the prescriptive Outline Development Plan for the site redundant (the Outline Development Plan forms part of the Christchurch District Plan and is discussed in more detail in the below section on Planning provisions).

Over the past 24 months GDL has negotiated with the previous landowners to acquire all titles of the land required to enable the development to proceed.

The project site represents the only opportunity to deliver a full format supermarket in this established part of Christchurch which has experienced significant residential growth through infill and redevelopment in recent years

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

The development comprises two stages.

Stage 1 (supermarket, retail/commercial development and the pocket park) will be developed immediately upon obtaining the necessary approvals and can be delivered within approximately 12 months from the commencement of works.

The development could be completed by late 2026. However, this is subject to consenting, noting that it is not unusual for supermarkets to take 2+ years to obtain consent. WWNZ's mix-used development in Halswell (South-West Christchurch) took over 3.5 years to receive consent.

As part of the Stage 1 works, GDL will also decontaminate and provide services to Stage 2 (residential) and will source a development partner to deliver this component.

What are the details of the regime under which approval is being sought?

Please write your answer here:

The key consenting requirements for this project are as follows:

- Land use consent required under the operative Christchurch District Plan.
- Land use consent required under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-SC). As a brownfield industrial site (ex-electricity lines depot) there is soil contamination that requires management and remediation. The applicant has undertaken a Detailed Site Investigation, with the level of contamination able to be managed through standard processes, noting that the end use for Stage 1 is commercial rather than residential in nature. The immediately adjacent land to the north which was also part of the old works depot currently has residential construction underway, demonstrating that NES-SC matters are capable of resolution through standard consenting processes.
- Regional Consents required under the operative Canterbury Regional Land and Water Plan. These consents are anticipated to be required for construction phase groundwater take and discharge should foundation construction intercept groundwater. Operational phase stormwater discharge consents will also be necessary. Stormwater is to be discharged to the Council's reticulated network, however the presence of contaminated soil on the site means that the application is unlikely to fall within the scope of the Council's global consent for stormwater discharge.
- The site is located close to the Christchurch City centre and therefore may have been subject to human occupation prior to 1900. As such an archaeological authority may be required under the Heritage New Zealand Pouhere Taonga Act 2014.
- For completeness, the site is not adjacent to any waterbodies, the Coastal Marine Area, and does not contain any sites identified as being of cultural, landscape, ecological, or heritage value in District or Regional Plans. As such the project is not subject to consenting or process relating to the Wildlife Act, Public Works Act, Conservation Act, Reserves Act, EEZCS Act, or Crown Minerals Act.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Christchurch City Council and Environment Canterbury.

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

A subdivision consent has been lodged with Christchurch City Council on 12 April 2024. This application is currently being processed (RMA/2024/1031). The application is for a boundary adjustment to consolidate internal titles. It is to be processed as a restricted discretionary activity. It is not anticipated that this boundary adjustment be subject to the fast-track process under the Bill as it is expected to be granted prior to any fast-track application being made.

No other consents for the same / similar project have been sought. The site has been vacant for approximately 20 years. Parts of the wider works depot site have been on-sold over the years to different parties. Land to the north of the application site is under development by another party (Mike Greer Homes) for multi-unit townhouses.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

GDL owns the project site.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

Subject to obtaining the relevant planning approvals (assuming the project is fast-track approved by March 2025), GDL would target the following development timeline:

- Detailed design – June 2025.
- Procurement – August 2025.
- Funding – September 2025 (WWNZ will self-fund the development).
- Construction commencement – October 2025.
- Completion – September 2026.

### Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Christchurch City Council

Environment Canterbury

Te Rūnanga o Ngāi Tahu is the relevant iwi authority. Te Ngāi Tūāhuriri Rūnanga is the relevant Papatipu Rūnanga of Ngāi Tahu, in whose takiwa the Site is located).

No land acquisition is anticipated to be required under the Public Works Act.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Prior to acquiring the site, GDL has had pre-application discussions with Christchurch City Council. The initial concept was for a standalone supermarket (without any other retail/commercial uses or any residential component) and suggestions were made to incorporate complementary uses to provide a more complete offering and also to improve urban design outcomes. These are reflected in the current proposal.

The previous site owner also undertook informal pre-application consultation with the planning and infrastructure (3-waters) teams at the Christchurch City Council regarding developing the site as a commercial centre containing a supermarket, small format shops, a preschool, and a medical centre.

As GDL has only recently acquired the site, no consultation with other stakeholders has occurred to date.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

No land acquisition is required under the Public Works Act 1981.

### Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The project is located within Te Waipounamu as covered by the Deed of Settlement between the Crown and Te Rūnanga o Ngāi Tahu. The settlement dated 21 November 1997 records the matters required to give effect to the settlement of all of Ngāi Tahu's historical claims. The settlement is implemented in a legislative sense through the Ngāi Tahu Claims Settlement Act 1998.

There are no specific principles and provisions in the settlement, including statutory acknowledgements, that specifically apply to the geographical location of the project.

None of the land on which the project activities will occur is land that has been or is required to be returned under the Ngāi Tahu Claims Settlement Act 1998.

The site is not identified as containing any identified cultural values, wāhi tapu, or wāhi taonga sites in the Christchurch District Plan.

The site is not subject to any Statutory Acknowledgements.

The site is privately owned fee simple land and therefore is not surplus Crown land where Ngāi Tahu have first right of refusal to acquire via their Treaty settlement.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary:

No file uploaded

## Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

It is anticipated that a detailed assessment of effects will be prepared as part of the consent process.

The effects that are typically encountered by supermarket, retail and residential projects in established urban areas are well known. From an initial assessment of the potential effects of this project which has been informed by expert technical assessment, GDL is satisfied that there are no effects-based reasons that would make the proposal unacceptable. It is expected that the AEE would include a detailed assessment of the following matters:

To support land use consents from the Christchurch City Council:

- Retail distribution: These effects relate to new centres drawing customers away from other established centres with the result that these existing centres fail commercially. For the effect to be significant, it needs to extend beyond simple trade competition effects, and instead needs to result in the loss of amenity and functionality provided to the surrounding community when a commercial centre experiences significant decline.

It is not anticipated that there would be material retail distribution effects.

The wider St Albans area has a strategic CBD-fringe location and as such is a prime location for ongoing intensification. PC14 advanced by Council as its response to NPS-UD Policy 3 directions includes a significant zoning of much of the proposed supermarket's catchment to a High Density Residential Zone that permits apartment blocks up to 6 stories in height. Sustained growth in the catchment is therefore anticipated, which is combined with the proposed supermarket being over 1km from the nearest other full service supermarket (Richmond New World). There is considered to be ample economic demand within the catchment to support the new store without drawing custom away from other centres to the point that there would be material retail distribution effects.

- Transport: Supermarkets can result in an increase in traffic generation.

Madras Street immediately adjacent to the site is a collector road that provides a good level of connectivity to the wider road network. Heavy goods vehicles (HGVs) supply that the store are proposed to only access the site form Madras Street, thereby avoiding the need to travel down adjacent local roads. The site is very well located for modal choice, with good levels of public transport and on-road cycle infrastructure in the vicinity. GDL anticipates that any adverse effects will be well managed through conditions of consent. These conditions of consent will be informed by an Integrated Transport Assessment (ITA) that will be prepared as part of the application. The ITA will assess in detail how the wider road network functions, crash records in the area that might indicate systemic issues with the current roading network, and the impacts additional traffic would have on the efficiency and safety of the adjacent network. The assessment would consider the location and design of the site entrances and any through-site routes, along with the likely

routing of heavy goods vehicles. The ITA would also assess the site's suitability for alternative modes of transport including proximity to public transport, proximity to cycleways and the provision of on-site facilities for both staff and customers who cycle, and the site's accessibility for pedestrians including pedestrian movement to and within the site. All of these matters would be addressed by proposed consent conditions.

- **Acoustic:** The traffic generated by supermarkets can generate noise as cars manoeuvre through the carpark. HGVs and associated loading activities can likewise generate vehicle noise in the 'back-of-house' area. Non-supermarket retail or hospitality tenancies such as cafes and bars can generate noise through amplified music and outdoor seating areas. Building services such as air conditioning plant can also generate noise. These acoustic effects are well suited to being managed by consent conditions that relate to matters such as operating hours, the design and location of roof plant, and the provision of acoustic fencing around the site boundaries.

- The proposed consent conditions would be informed by an acoustic report. This report would assess noise generated from the various potential sources, assess that noise at the boundary of the site where it might be experienced by residential neighbours, and assess whether such noise was delivering a level of amenity that is appropriate to a residential/commercial interface. Conditions of consent will then be proposed cognisant with the relevant NZS standards and the applicable noise rules in the Christchurch District Plan.

- **Urban Design:** WWNZ has a robust internal review process to ensure the design and layout of new stores meets the functional needs of supermarkets and integrates well with the adjacent neighbourhood. GDL anticipates that the Urban Design outcomes of the project will be positive.

- An urban design assessment was undertaken as part of the application for the supermarket project by the previous landowner and found that there were significant benefits for the local community being able to readily access their grocery needs, with the proposal contributing to an attractive, functional mixed-use community. GDL anticipates the outcome of the proposed project to have similar outcomes. This is especially the case when the proposed development is contrasted with the current state of the site as a derelict brownfield works depot that has stood vacant for some twenty years and currently has a negative visual and amenity effect on the neighbourhood. The inclusion of both the main supermarket and several small-format retail stores and cafes enables the site to function as a genuine community hub. Building massing and site layout is appropriate to a commercial centre set within a medium density residential context.

To support regional consents from the Canterbury Regional Council, with some overlap with land use consents regarding the management of earthworks and soil contamination:

- **Civil:** The design of supermarkets requires the integration of infrastructure services. These typically include 3-waters, along with electricity and telecommunications. The site has had an urban zoning for decades, and is located immediately adjacent to Council's reticulated networks. Construction-phase stormwater management is a standard matter that is encountered on all large development sites in Christchurch. There are proven solutions to erosion and sediment control, with these matters being routinely managed via conditions of consent.

- **Soil Contamination:** A Detailed Site Investigation (DSI) has been obtained to inform the current subdivision (boundary adjustment) application. The DSI shows that on-site contamination is able to be managed via a Site Management Plan that sees material either encapsulated under future foundations/ carpark hardstand, or removed from the site to an approved facility. It is anticipated that removal will be the preferred solution for the northern portion of the site that is to be developed for residential housing.

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## Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

The site is a long-established urban zone in the centre of Christchurch. It is not near the coastline and does not contain any waterways or wetlands. The only NPS/ NES that are considered to be relevant are as follows:

### National Policy Statement on Urban Development (NPS-UD)

The site falls squarely within the ambit of the NPS-UD, being a large brownfield site in a CBD fringe location. The NPS-UD provides high level national direction regarding the delivery of sufficient capacity to meet both residential and business needs over the short to long term. Such capacity is to be located in areas that result in a 'well-functioning urban environment'.

Council has undertaken a Housing and Business Capacity Assessment as required under the NPS-UD. This assessment has shown there to be a shortfall in commercially zoned and available land of over 100ha over the medium to long term. Policy 1, Policy 3 and 6 of the NPS-UD provide direction on the matters that contribute towards a well-functioning urban environment.

Under Policy 3(c) building heights must be at least 6 stories for areas within a walkable catchment of the edge of city centre zones. The site is approximately 1.3km from the edge of the CBD, which means that all the residential catchment between the site and the CBD is within a walkable catchment and therefore needs to enable residential development up to at least 6 stories in height. Council's PC14 to implement the NPS-UD proposes to rezone the residential areas between the site and the CBD to a High Density Residential Zone with appropriate heights. The surrounding area is therefore anticipated to experience a significant and uplift in density and the number of people living in the wider neighbourhood. The proposed site enables the day-to-day grocery needs of this significant anticipated uplift in a convenient manner, thereby supporting the strategic direction of enabling more people to life and work in close proximity to city centres.

In addition to the urban form outcomes directed by Policy 3, Policy 1 also sets out matters that contribute towards delivering well-functioning urban environments. The proposal will result in a vacant brownfield site being redeveloped for additional housing (Policy 1(a)(i)) and will critically provide a site that is suitable for a supermarket and associated retail in a suburb that is targeted for high residential growth (Policy 1(b)). The proposal readily supports Policy 1(c) outcomes of delivery, a high level of accessibility between homes, employment, and services in a location that is well-supported by public transport, walking and cycling (Policy 1(d)). By enabling the community to access their grocery needs by non-car transport modes the application supports a reduction in greenhouse gas emissions (Policy 1(e)), and is located in an area that is not exposed to natural hazards that are exacerbated by climate change (Policy 1(f)).

Policy 6 identifies that the planned built form anticipated by the NPS-UD and subsequent local planning documents (such as PC14 promulgated by Christchurch City Council), will result in a change in amenity, which such change being potentially viewed as both positive and negative by different members of the community. Such change is integral to how cities grow and respond to the demand for both housing and business land generated by an increasing population. The site is strategically located to support such growth in a location where high density forms of housing are anticipated.

NES-CS

As a vacant brownfield works depot, the presence of contaminated soil on the site has been confirmed. The application has commissioned a DSI which has set out how that contaminated soil is to be managed in accordance with best practice. The NES-CS provides a clear regulatory pathway for the identification and remediation of contaminated sites, thereby enabling them to be safely reused and repurposed.

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## Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

The fast-track process provided for in the Bill will enable the project to be processed in a more efficient and timely manner than under normal consenting regimes for the following reasons:

- Significant social and economic benefits associated with supermarkets are often overshadowed by localised amenity effects (which can be effectively addressed through conditions), while impractical urban design expectations almost always create tension with the functional and operational requirements of supermarkets, resulting in inefficient, drawn out and costly consenting processes.
- Most supermarket applications require a public hearing and sometimes appeal to the Environment Court is needed, adding further costs and delays to the process. When projects of this nature are appealed to the Environment Court, they are typically resolved through the finalisation of consent conditions in relation to matters such as transport and acoustic effects. Conditions of this nature can be addressed as part of a single stage fast-track process. This makes the project an ideal candidate for the fast-track process contained in the Bill.
- Below are some examples of the time taken to process centre-based / mixed-use supermarkets based on GDL's experience over the past decade:
  - o Hobsonville (North-West Auckland) - 31 months
  - o Beachlands (East Auckland) - 36 months
  - o Pioneer Highway (Palmerston North) - 34 months
  - o Halswell (South-West Christchurch) - 44 months

The fast track process will likely provide a more focused and efficient approvals process, which would allow the development (and the associated benefits) to happen much sooner than the standard RMA process, based on real examples identified above.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

The proposed project is well suited to and appropriate for the fast-track process as the requirements of the project and its potential adverse effects are known, and can be appropriately addressed through consent conditions.

The applicant has extensive experience delivering similar projects and will approach the fast-track process with a high degree of professionalism. The application will be prepared by a highly competent and experienced team who are familiar with similar fast-track processes.

Importantly, the applicant is fully committed to the timely delivery of the consented scheme. This will ensure that the stated benefits of the project will be realised.

Has the project been identified as a priority project in a:

Not Answered

Please explain your answer here:

No, however, the project is well aligned with the objectives of the Canterbury Regional Policy statement as discussed below.

Further, it is consistent with the Greater Christchurch Spatial Plan as discussed below.

Will the project deliver regionally or nationally significant infrastructure?

Not Answered

Please explain your answer here:

The project is not an infrastructure project.

Will the project:

increase the supply of housing, address housing needs, contribute to a well-functioning urban environment

Please explain your answer here:

The project will directly increase the supply of housing and more important, provide an essential service that will support the recent and ongoing growth in the surrounding area, and act as a catalyst for future growth.

The proposed development will contribute to a well-functioning urban environment through both function and form. The nature of the proposal will contribute to the amenity, convenience, and wellbeing of the surrounding communities by providing essential services to an area that is currently under-served.

It also enhances amenity outcomes through introducing a modern, high quality, mixed-used development to a derelict brownfield site that has remained vacant for over two decades.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The economic benefits of the project will be substantial. GDL will invest circa \$50mil into the development and fit-out of the Stage 1 development alone (Stage 2 is yet to be costed).

During the design and development phase, the proposal will generate employment and service opportunities for professional services and trades.

Once built, the supermarket alone will provide up to 100 full and part-time employment opportunities, and generate service and employment opportunities associated with the ongoing operations and maintenance of the premises (ongoing contracts from the service and maintenance of the supermarket).

Sales revenue from the supermarket will translate to tax revenue (GST), and any profits from the development or business operations will generate further tax revenue.

The development will also provide opportunities for smaller retail / businesses to co-locate with a supermarket anchor, supporting their business ventures which will in turn generate additional and complementary economic and employment opportunities.

By enhancing the amenity and convenience of this area, the proposed development will support further investments in this part of Christchurch through ongoing intensification and regeneration of the surrounding area.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

This is an urban brownfield development project.

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

This is an urban brownfield development project.

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:



The development will support reductions in vehicle distance travelled by providing an essential service within an established residential catchment that is currently underserved in terms of supermarket choice. The proposed co-location of other complementary retail and commercial services will further reduce the need to make multiple private vehicle trips. A sizeable and growing population also falls within walking (and cycling) distance to the proposed development.

Further, WWNZ is committed to:

- By 2025 sourcing 100% renewable electricity to power its businesses.
- By 2025 ensuring there is zero food waste going to land waste from its operation.
- By 2030, aim to reduce emissions from operations by 63% compared to a 2015 baseline.
- By 2030, aim to reduce scope 3 emissions by 19% compared to a 2015 baseline.
- Aim to reach net positive emissions for operations no later than 2050 and much earlier if possible.
- All new developments will achieve a 4 Green Star design and as-built rating, and by 2025 aim to achieve 5 Green Star rating.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

The land is contaminated due to its historic uses, groundwater levels and also challenging geotech conditions. GDL has carried out detailed due diligence investigations to inform decontamination, and ground improvement/foundation design, and on-site stormwater management such that future development of the site will be resilient from the effects of natural hazards.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

The project site represents the only realistic opportunity to deliver a full format supermarket in this established part of Christchurch which has experienced significant residential growth through infill and development in recent years and that is targeted for ongoing intensification as a key element in wider growth strategies that seek to accommodate the majority of population growth via intensification in the inner suburbs. It represents the redevelopment of a site that has sat in its current somewhat derelict condition for some twenty years and will unlock the much needed urban development capacity of the site close to Christchurch City noting that Christchurch City has a shortfall in commercially zoned and available land of over 100ha over the medium to long term.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

Canterbury Regional Policy Statement

The Canterbury Regional Policy Statement (CRPS) was revised following the Canterbury Earthquake sequence to ensure it provided an appropriate framework for the recovery, regeneration, and ongoing vitality of the regional's main urban centres. Two CRPS policies are of particular relevance for informing and understanding the associated Christchurch District Plan (Plan) policies regarding commercial centres.

Policy 6.3.6 seeks to ensure that the provision, recovery and rebuilding of business land in Greater Christchurch maximises business retention, attracts investment, and provides for healthy working environments. Of particular relevance to this application, such provision is to be provided for in a manner that promotes:

- (1) The utilisation and redevelopment of existing business land;...
- (3) Reinforces the role of the Central City, as the city's primary commercial centre, and that of the Key Activity Centres; and
- (4) Recognises that new commercial activities are primarily directed to the Central City, Key Activity Centres and neighbourhood centres where these activities reflect and support the function and role of those centres; or in circumstances where locating out of centre, will not give rise to significant adverse distributional or urban form effects;...

The proposal is considered to achieve these matters. It constitutes rebuilding on a site that is predominantly zoned for business, thereby attracting investment. It does not threaten the role of the City Centre or Key Activity Centres (KACs), and the applicant's preliminary economic assessment has concluded that the proposal will not come close to the CRPS threshold of 'significant adverse distributional effects'.

Policy 6.3.8 relates to the regeneration of brownfield land, and is therefore also of particular relevance given the brownfield nature of the application site. This policy seeks to encourage and provide for the recovery and regeneration of existing brownfield areas through new comprehensive residential, mixed-use or business developments, provided such activities will ensure the safe and efficient functioning of the transport network and will not have significant adverse distributional or urban form effects on the Central City, KACs and neighbourhood centres, or give rise to significant reverse sensitivity effects.

The proposal again readily achieves this policy direction. The site has sat in its current somewhat derelict condition for some twenty years, following the uplifting of an unwanted designation and the relocation of a works depot. The proposal seeks to utilise this brownfield site for a mixed-use development that will include commercial, community, and residential activities. As noted above, the proposal will not give rise to significantly adverse distributional

effects.

The proposal is therefore considered to sit comfortably within the CRPS framework, noting that this higher order framework is given effect to through the below Plan ) provisions.

For completeness, the Plan policy framework likewise incorporates the direction established through the Central Christchurch Recovery Plan, with the proposal not having any discernible adverse effects on the recovery of the city centre. There are no other Regeneration Plans of relevance to this site-specific proposal.

#### Christchurch District Plan

The Plan provides strong, enabling direction that such development on brownfield sites in Residential Zones is to be enabled, provided, for, and incentivised. Such direction aligns with the direction to 'encourage and provide for' brownfield regeneration in the higher order CRPS. The proposal meets the criteria for such development in that infrastructure, transport, and amenity outcomes are suitably managed.

The Commercial provisions dovetail with those in the residential chapter. Commercial development is to be focussed on existing commercial zones, as is the case here where the bulk of the proposed commercial activity is located within a Commercial Local zone. Outward expansion of existing zoned centres is likewise anticipated, provided such expansion is of a scale that the centre remains in keeping with its role and function in the centres hierarchy.

The expansion beyond the zone boundary is modest and is comprised largely of supermarket loading, access, parking, and a café, noting that such activities are to be provided for in residential brownfield contexts, along with community facilities such as preschools and medical centres. The expansion of the existing centre enables a logical, safe, and practical site layout to be formed.

The proposal is considered to remain in keeping with the role of local centres, being to provide for the convenience needs of the surrounding community. It is not at a scale that threatens or is commensurate with the larger neighbourhood centres. An economic assessment has confirmed that the proposal will not adversely affect the role of other centres or the City Centre.

The Plan includes an Outline Development Plan (ODP) for the site which provides detail on the site layout and the size of individual retail elements. This ODP was developed as part of a proposal advanced some fifteen years ago prior to the earthquakes and when the entire block was under single ownership. The detailed layout is no longer considered to be fit for purpose and does not provide for a much-needed full service supermarket. The proposed design nonetheless retains elements of the ODP such as provision of a small pocket park and inclusion of several small formant retail tenancies. Non-compliance with the ODP has a restricted discretionary activity status.

The proposed development has been carefully designed to deliver an appropriate urban design outcome for a local centre, whilst concurrently delivering the functional outcomes required for supermarkets to operate safely. The supermarket is oriented toward the road with glazing and a clearly legible front entrance, reached by safe and direct pedestrian routes. Local shops are located on the store's frontage to provide activation and overlooking and to facilitate a welcoming local community hub.

Transport, stormwater, and acoustic matters are able to be addressed through a combination of design and standard consent conditions.

Overall the proposal is considered to be consistent with the policy outcomes sought by the Plan and will facilitate the timely redevelopment of a large derelict brownfield site in a strategic location.

#### Strategic Directions

The Objective and Policy framework in the Plan is a hierarchy. The Strategic Objectives in Section 3 establish the sustainable management matters to be addressed within individual sections of the Plan, of which Objectives 3.3.1 and 3.3.2 have relative primacy. That hierarchy is identified in the Interpretation at Section 3.3 of the CDP.

For the purposes of preparing, changing, interpreting and implementing this District Plan:

1. All other objectives within this Chapter are to be expressed and achieved in a manner consistent with Objectives 3.3.1 and 3.3.2; and
2. The objectives and policies in all other Chapters of the District Plan are to be expressed and achieved in a manner consistent with the objectives in this Chapter.

For the purpose of this Fast Track application, the focus has therefore been kept on the key Strategic Directions on the basis that the subsequent zone-specific Plan objectives and policies are methods for giving effect to the various objectives in the Strategic Directions chapter. Alignment with the Strategic Directions means that the project is also likely to be generally aligned with the more specific policies that follow. Brief assessment is provided on the key Commercial and Residential zone policies that relate to brownfield regeneration.

#### Objective 3.3.1 Objective – Enabling recovery and facilitating the future enhancement of the district

This Objective has primacy within the hierarchical structure of the Plan and sets out that in order to achieve the purpose of the Resource Management Act, that 'the expedited recovery and future enhancement of Christchurch as a dynamic, prosperous and internationally competitive city' was the overarching outcome that the Plan, in a manner that: meets community needs for housing, economic development, and social and cultural wellbeing; fosters investment certainty; and sustains important qualities and values of the natural environment.

#### Assessment

The proposal seeks to progress commercial development within a Commercial Local zone, on a site that has been vacant for some time. The proposal will establish a new local centre to meet the needs of the surrounding residential community, by providing retail and community facilities.

#### Objective 3.3.5 Objective – Business and economic prosperity

The critical importance of business and economic prosperity to Christchurch's recovery and to community wellbeing and resilience is recognised and a range of opportunities provided for business activities to establish and prosper.

#### Assessment

The proposal enables business activities including retail and community activities to establish on a site where commercial development is anticipated to occur. The proposal is intended to serve the local residential community, and is located largely within a Commercial Local zone where such development is provided for.

#### Objective 3.3.6 Objective – Natural Hazards

The relevant clause in this Objective is (a)(ii) which seeks to ensure that new subdivision and development is undertaken in a manner that ensures that the risks of natural hazards to people, property, and infrastructure are appropriately mitigated.

#### Assessment

The proposal site is zoned for residential and commercial uses, with such development considered to be appropriate subject to any necessary mitigation. Portions of the site are located within a Flood Management Area (as are many areas in central and eastern Christchurch). The Plan manages this risk through specifying minimum floor levels that new developments are required to meet. The proposed buildings will be constructed to minimise damage from flooding, and the proposed earthworks will not exacerbate any potential flood risk.

#### Objective 3.3.7 Objective – Urban growth, form and design

This Objective seeks a well-integrated pattern of development that respects environmental context and manages development accordingly; improves accessibility and connectivity; maintains and enhances the commercial centres hierarchy; and supports the redevelopment of brownfield sites for residential, business and mixed-use activities.

#### Assessment

The proposal is to redevelop an existing vacant brownfield site for mixed-use commercial activities including a supermarket, retail tenancies and community activities. The site is zoned Commercial Local and is therefore anticipated to be developed for commercial activities. The development is intended to serve the local area and will not undermine the primacy of the higher order centres.

#### Objective 3.3.10 Commercial and industrial activities

This objective seeks the recovery and stimulation of commercial and industrial activities in a way that expedites recovery and long-term growth, including by enabling rebuilding of existing business areas.

#### Assessment

The proposal facilitates the development of an integrated local centre that provides convenience services and community facilities to St Albans residents through the rebuilding of a vacant site that is largely commercially zoned.

#### Commercial Zone

The suite of commercial objectives and policies seek to maintain a centres-based approach to commercial development within the city and to ensure that new development in commercial centres is of high quality and appropriate to its context.

Both Objective 15.2.2 and associated Policy 15.2.2.1 seek to focus commercial activity within a hierarchical network of centres to meet the needs of both the community and business. The objective seeks that development is consistent with the role of each centre and supports a compact urban form that integrates commercial activity with community and residential activities in locations accessible by a range of modes of transport. Table 15.1 describes the role of the various centres in the hierarchy. Local centres are to comprise of a small group of convenience shops and in some instances community facilities; are to be accessible by walking, cycling, and potentially a bus route; and can also include stand-alone supermarkets servicing the surrounding residential community. Their size is described as being up to 3,000m<sup>2</sup>. Neighbourhood centres in contrast are to function as a destination for weekly and daily shopping needs and may offer a broader range of activities including comparison shopping, entertainment, small scale offices, and be anchored by a supermarket and/or department store. The size of such centres ranges from 3,000m<sup>2</sup> up to 30,000m<sup>2</sup>.

Policy 15.2.2.4 provides the key guidance on how growth of centres is to be managed. Growth in commercial activity is to be focussed within existing commercial centres, and any outward expansion of a commercial centre must:

- (i) Ensure the expanded centre remains commensurate with the centre's role within a strategic network of centres, while not undermining the function of other centres;
- (ii) Be integrated with the provision of infrastructure, including the transport network;
- (iii) Be undertaken in such a manner that manages adverse effects at the interface with the adjoining zone; and
- (iv) Be consistent with (A) the scale of increasing residential development opportunities to meet intensification targets in and around centres; and (B) revitalising the Central City as the primary community focal point.

#### Assessment

The Plan's commercial framework has a clear focus on enabling commercial development to meet both the needs of business and the community. This proposal does exactly that through the provision of a new local centre on a site that is largely zoned for such use. The function of the proposed centre is considered to remain consistent with the role and function of a local centre, which is to provide for the convenience needs of the local community and may include the provision of community facilities. The supermarket is of a medium size such that its intended catchment is predominantly the local area which is currently underserved by full service supermarkets. It is important to emphasise that the inclusion of a stand-alone supermarket is fully anticipated as being within the ambit of a local centre as described in Table 15.1.

Whilst the total size of the proposed centre is over the 3,000m<sup>2</sup> guide in the policy, the key to the policy is the role of the centre, rather than a narrow focus on floorspace. The role and function of the proposed centre will remain commensurate with that of a local centre. The role is highlighted by comparison to the range of shops and services on offer at neighbourhood centres. The listed neighbourhood centres such as Merivale, Bishopdale, Church Corner, and Ferrymead for example are all significantly larger and provide a far greater range of services than that proposed here. Even the smaller neighbourhood centres such as Avonhead or St Martins are larger than that proposed.

The proposal is consistent with the growth direction contained in Policy 15.2.2.4. The proposal is focussed on an existing zoned local centre, and therefore constitutes the intensification of activity within this zone. The elements of the proposal that result in outward expansion (loading bay, access, parking and café) are all consistent with the criteria for such expansion, namely such expansion is not at a scale where the centre's role changes; is integrated with infrastructure; manages zone interface issues; facilitates residential development on the balance of the site and indeed the surrounding Residential Medium Density (RMD) zone by the provision of convenient facilities; and the economic assessment has confirmed that the proposed centre will not adversely affect the role and function of the City Centre.

#### Residential objectives and policies

Objective 14.2.7 provides for new, comprehensively developed, mixed use commercial and residential development on brownfield sites. Related Policy 14.2.7.1 is to support and incentivise brownfield redevelopment where:

- i. natural hazards can be mitigated;
  - ii. adequate infrastructure services and capacity are available;
  - iii. reverse sensitivity effects on existing industrial areas are managed;
  - iv. the safety and efficiency of the current and future transport system is not significantly adversely affected;
  - v. there is good walking and cycling access to public transport routes, commercial and community services, and open space;
  - vi. if necessary, contaminated land is remediated in accordance with national and regional standards; and
  - vii. the redevelopment does not impact on the vitality and strategic role of commercial centres.
- a. Ensure the redevelopment is planned and designed to achieve:
- i. high quality urban design and on-site amenity; and
  - ii. development that is integrated and sympathetic with the amenity of the adjacent neighbourhoods and adjoining sites.

#### Assessment

The term 'brownfield' where it occurs in this objective and associated policy is defined as meaning "abandoned or underutilised commercial or industrial land, or land no longer required by a requiring authority for a designated purpose". As set out in the background section above, the balance of the site was used for industrial purposes as a works depot and has since been left in an abandoned state for several decades. As such it is considered to fall squarely within the definition of 'brownfield' as applied to the residential policy framework.

Objective 14.2.7 and policy 14.2.7.1 seek to both provide for, support, and incentivise, the comprehensive redevelopment of brownfield sites for commercial, residential, and mixed use activities. The language of these provisions is both directive and strongly enabling. It provides a distinctly different policy pathway than that which would otherwise apply under objective 14.2.6 relating to non-residential activities in general. It is important to emphasise that objective 14.2.6 includes a note that "this objective and subsequent policies do not apply to brownfield sites".

The proposal is to establish a comprehensively designed mixed use commercial development on the application site, which forms the southern half of a larger vacant brownfield site. The northern half of the block is currently being developed by other parties for medium density housing, with stage 2 of this proposal also including the provision of medium density housing along the site's northern edge. The proposal will not result in adverse effects on existing industrial areas, as the surrounding area is residential. The proposal will not have any significant effects on the transport system, and the vehicle accesses have been designed to operate in a safe efficient manner. The site provides for pedestrian and cycle access, and is located a short walk from a bus route along Barbados Street. Contaminated land within the site will be remedied, in accordance with NES-CS requirements. As set out above, the proposed redevelopment will not impact on the vitality or strategic role of other higher order commercial centres. The proposal will result in a high quality local centre, with a high level of on-site amenity, which is well integrated into the surrounding residential neighbourhood.

The proposal is therefore consistent with objective 14.2.7.1 and related policy 14.2.7.1 that seek to support and incentivise brownfield redevelopment.

#### Greater Christchurch Spatial Plan

The Greater Christchurch Spatial Plan 2024 (Spatial Plan) has recently been prepared by the member Councils and organisations. This Spatial Plan is a 'Future Development Strategy' prepared in accordance with NPS-UD requirements. As such it provides strategic direction for how the City and adjacent urban areas are to develop over the coming 30 years.

The Spatial Plan is based on an expectation that the current 500,000 population of Greater Christchurch will continue historic trends of growing by approximately 2% each year. This equates to an anticipated population gain of some 200,000 new residents over the next 25 years.

The Spatial Plan seeks to accommodate this significant quantum of growth primarily via intensification within existing urban areas. No new greenfield growth areas are shown beyond those identified in the 2007 Urban Development Strategy (which was itself a 30-year growth plan).

As a large brownfield site located in an inner suburb that is within walking distance of the City centre, the site is ideally placed to support the strategic growth management approach sought for the sub-region. Significant residential intensification is anticipated adjacent to the site, with the site providing a key commercial facility to support this growth in the residential catchment. Provision of both housing and employment/ services needs to go hand-in-hand for communities to be sustainable and for the growth management strategy articulated in the Spatial Plan to be realised.

#### Anything else?

Please write your answer here:

Does the project include an activity which would make it ineligible?

No

If yes, please explain:

#### Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

Parts of the site are identified as being located within a Flood Management Area of the Plan. This area covers much of eastern and central Christchurch. Surface flooding is generated in high rainfall events where the Council's reticulated network is unable to transfer stormwater in sufficient volume. The Plan seeks to manage flood risk primarily through specifying minimum internal floor levels. New buildings that meet these levels are permitted activities. The proposed new buildings will be designed to meet the specified floor level.

Like much of Christchurch, the site is identified in the Plan as being located within a Liquefaction Management Area. Foundation design solutions are available and proven to ensure the proposed buildings meet Building Code requirements.

## Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

None to be best of the applicant's knowledge, in its capacity as a developer.

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## Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Joshua Leckie

Important notes