

To: Listed Projects Team - Ministry for the Environment

From: Jarette Wickham, Fern Beck and Nick Roberts – Barker & Associates Limited

Date: 27 August 2026

Re: Planning Memorandum for the Costco Christchurch Project Referral Application

1.0 Introduction

1.1 Costco Christchurch

Costco Wholesale New Zealand Limited (Costco) is one of the world's largest retailers, operating around 890 warehouses across the United States, Canada, Mexico, the United Kingdom, Japan, Korea, Taiwan, Spain, China, Australia, and New Zealand. Costco operates a 'wholesale club' model that differs materially from both conventional supermarkets and conventional large format retailers. Customers pay an annual membership fee and, in return, can access high-quality branded and private-label products, in bulk sizes, at low prices. Costco employs around 330,000 people worldwide and serves more than 63 million members. Costco is recognised internationally for providing value and convenience to its members, while also creating local employment opportunities and supporting local suppliers.

Costco and Miles Premises Limited as joint Applicants have engaged Barker & Associates (B&A) to provide planning and urban design services in relation to the establishment of the 'Costco Christchurch Project'.

Costco Wholesale New Zealand Limited and Miles Premises Limited are joint applicants for the Costco Christchurch Project, reflecting their respective roles in implementing the Costco Christchurch Project and holding the approvals required to enable it. Miles Premises will be responsible for the site preparation, enabling works, subdivision and complementary large format retail components of the Costco Christchurch Project, while Costco will be responsible for the construction and operation of the Costco warehouse and fuel facility.

The Costco Christchurch Project is located across four land parcels, 475 Memorial Avenue, 500 and 520 Avonhead Road, and 400 Russley Road, Avonhead, Christchurch.

The **Costco Christchurch Project** comprises the following:

- Establishment of a new Costco Wholesale warehouse retail store, with ancillary tyre centre, food court and retail area, with an approximate gross floor area (GFA) of 16,090m², together with associated signage,
- Establishment of a members' fuel facility, including an associated data hut, signage and vehicle manoeuvring areas to service both cars and trucks,
- Establishment of approximately 7,900m² of complementary large format retail activities, anticipated to comprise a discount department store, chemist and one or two other large format tenancies, together with associated signage and customer and staff parking,

- Amendments to the approved subdivision boundaries and establishment of new and modified road connections and vehicle access points to support the development, including the removal and replacement of street trees; and
- Enabling works, including site preparation, earthworks and the installation of supporting roading infrastructure and services including required upgrades.

The Costco Christchurch indicative concept plan is included as **Attachment 2**. The concept is well advanced and illustrates the proposed development layout, however, the final layout remains subject to refinement following further specialist input, investigations and detailed design.

The overall Costco Christchurch Project is not proposed to be staged as separate development phases, although construction and earthworks may be sequenced progressively for practical and environmental management purposes. Construction and earthworks may nevertheless be undertaken progressively to manage construction sequencing, exposed ground and erosion, sediment and dust effects.

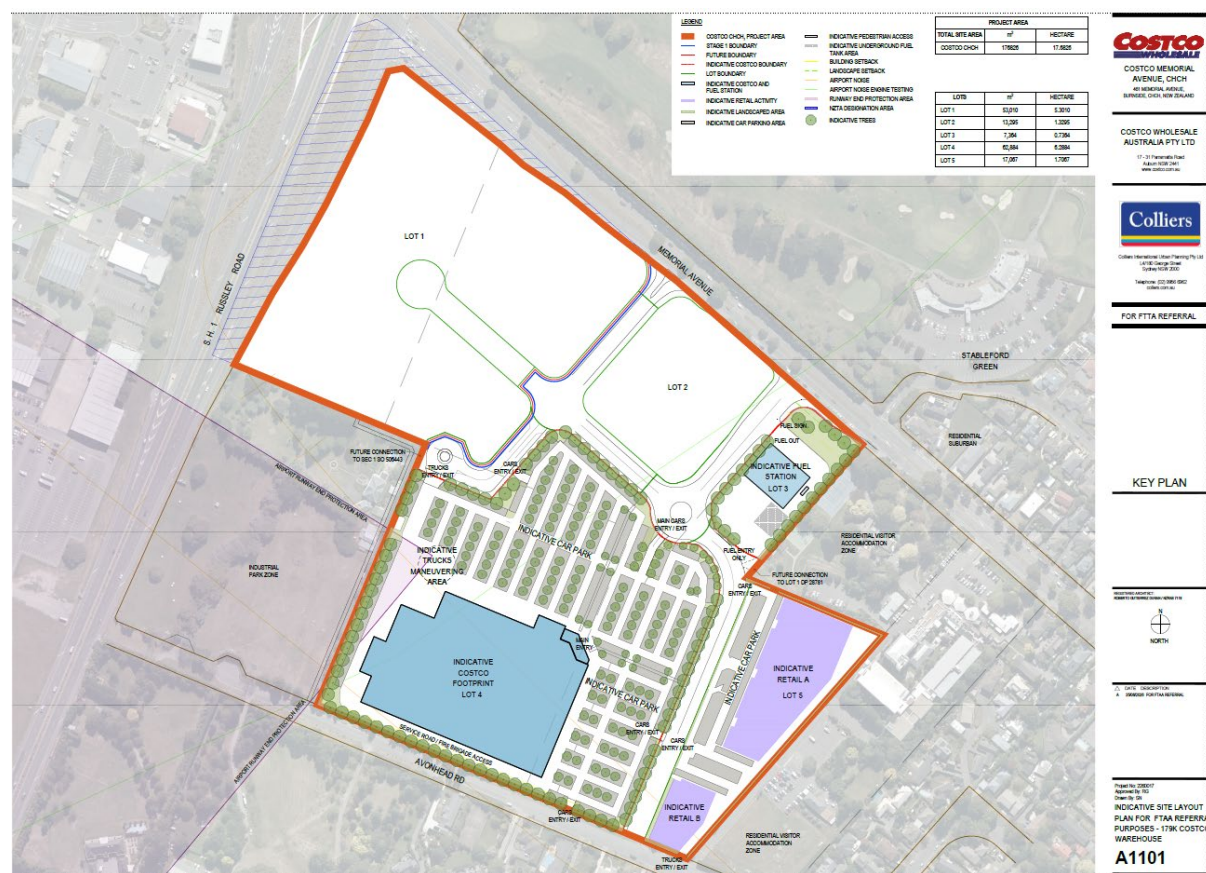


Figure 1: Costco Christchurch Project Referral Indicative Concept Plan

Overall, the Costco Christchurch Project is considered to satisfy the referral criteria under Section 22 of the FTAA because it will:

- Deliver significant regional economic benefits through approximately \$90 million of investment and substantial construction and ongoing employment;
- Promote competition in the grocery industry by establishing Costco's first South Island warehouse, consistent with the Government Policy Statement – Grocery Competition;
- Enable the productive development of a strategically located and currently underutilised urban site;

- Benefit from the more timely and integrated consenting pathway available under the FTAA; and
- Be developed without significant environmental constraints, with technical assessments confirming that potential effects can be appropriately managed through detailed design, mitigation and conditions at the substantive application stage.

1.1.1 Transport

The proposed transport and access arrangements are described in the Stantec Transport Assessment (**Attachment 5**). The proposal retains and develops the transport framework previously established through the Memorial Avenue Industrial Park rezoning and subdivision consent, with amendments to accommodate the proposed Costco Christchurch Project. The key transport elements proposed include:

- A primary signalised access from Memorial Avenue;
- A secondary left-in/left-out access from Memorial Avenue;
- An internal collector road network providing access to the Costco warehouse, members fuel facility, complementary large format retail and associated parking and servicing areas;
- Completion of the internal road connection through to Avonhead Road, providing an additional connection to the surrounding collector road network;
- Customer and staff parking and dedicated servicing and loading arrangements;
- Provision for walking and cycling connections through the development and connections towards the surrounding network and nearby public transport services; and
- A members fuel facility, servicing cars and trucks associated with Costco membership and not operating as a general public fuel facility.

The proposed access arrangements provide multiple connections to the surrounding transport network, including access to the strategic road network via Memorial Avenue and State Highway 1 and the local collector network via Avonhead Road. The detailed design of the internal roading, intersections, parking, servicing and active transport connections will be further developed as part of the substantive application.

1.1.2 Infrastructure and Servicing

A high-level Infrastructure Design Report has been prepared by Eliot Sinclair (**Attachment 6**). The proposed infrastructure and servicing arrangements are summarised below.

Water Supply

The development will be serviced by extensions to the existing Christchurch City Council (CCC) reticulated water supply network from Memorial Avenue and Avonhead Road. CCC have identified that there is no current water supply to the site and any water main extension would need to be provided by the developer. It has been identified that there is a point of supply is the existing DN300 uPVC mains near the Memorial Avenue/Roydvale Avenue and Avonhead Road/Hawthornden Road intersections. New DN300 water mains of approximately 600 m along Memorial Avenue and 380 m along Avonhead Road are proposed to connect the development and provide for potable water and firefighting requirements. This approach was supported by Council in the approved subdivision consent for this land and associated consent conditions.

Hydrant testing has confirmed that the existing CCC network has sufficient capacity and pressure to support the anticipated development and FW4 firefighting demands. Infrastructure within vested roads will vest with

CCC, while infrastructure within private roads will remain in private ownership. Detailed water supply modelling and design will be confirmed as part of the substantive application and detailed engineering design.

Wastewater

The development will be serviced by the existing CCC wastewater network. There is currently no wastewater infrastructure within Memorial Avenue; however, existing DN300 and DN375 uPVC gravity sewer mains are located within Avonhead Road and provide a suitable discharge point for the development.

Council, in its s11 memo, identified that the site is located within a Limited Sewer Discharge Zone, which restricts the average daily wastewater discharge from the site to 0.09 L/s/ha. This matter has subsequently been reviewed, and it is understood that the downstream sewer infrastructure upgrades identified in Rule 16.6.6.2.6 for the Memorial Avenue Industrial Park have now been completed. Accordingly, the wastewater discharge limitation no longer applies to the site.

The site is proposed to be predominantly serviced by a Local Pressure Sewer (LPS) network discharging to the existing DN375 gravity sewer within Avonhead Road. Depending on site levels and grades, portions of the development may be serviced by gravity, with the balance serviced by LPS. Wastewater infrastructure within private roads will remain in private ownership.

The final servicing arrangement and connection point will be confirmed as part of the substantive application and detailed engineering design.

Stormwater

Stormwater runoff from the proposed collector road and private roads will be captured and conveyed through a combination of kerb and channel, sumps and pipe reticulation, with treatment provided prior to discharge to ground via soakage pits. Stormwater from individual allotments will also generally be managed onsite, with roof runoff discharged directly to soakage and runoff from hardstand areas treated prior to discharge.

The stormwater system will be designed to manage runoff from rainfall events up to and including the 2% AEP event, with secondary overland flow paths provided through the road network where required. Runoff exceeding the design event will discharge toward Memorial Avenue and/or Avonhead Road.

Stormwater infiltration systems will be designed to limit the duration of surface ponding to minimise the potential to attract birds, given the site's proximity to Christchurch Airport. Appropriate treatment and pre-treatment will be provided for runoff from hardstand areas, including consideration of gross pollutants and potential spills. Roofing materials and associated runoff will be managed to avoid contaminants such as zinc and copper entering the stormwater system.

Detailed stormwater design, including treatment, conveyance, soakage and secondary flow arrangements, will be confirmed as part of the substantive application and detailed engineering design.

Power, Telecommunications and Street Lights

Power and telecommunications services will be provided to all lots in accordance with utility provider and industry standards. Initial consultation with service providers has confirmed that the development can be serviced by the existing networks, subject to capacity remaining available at the time of connection and confirmation of any required network upgrades. Final servicing arrangements will be confirmed as part of the substantive application and detailed design.

1.1.3 Earthworks

The development will require bulk earthworks, including cut and fill, to form roads, service corridors, stormwater infrastructure and finished development platforms across the site. Earthworks will generally involve site contouring and formation of an even development platform, with potential ground improvement undertaken where required to improve road subgrade conditions. Earthworks design and staging will have regard to geotechnical constraints, with appropriate erosion, sediment and dust management measures implemented throughout construction. A construction-phase stormwater discharge consent will be required for earthworks across the wider site, supported by appropriate erosion and sediment controls. An existing bore on the site will need to be located and recommissioned, or alternatively a new bore established, to enable groundwater to be used for dust suppression during earthworks. The proposal may also involve the temporary stockpiling of topsoil to facilitate staged earthworks, with surplus material removed from the site as required.

1.1.4 Signage

The proposal will include 'Costco Wholesale' signage, signage associated with the members' fuel facility, and ancillary identification and directional signage. Signage may be externally illuminated with downward-facing lighting. Signage associated with the complementary large format retail activities may also include freestanding pylon signs identifying individual retailers and providing directional information. Some signage may be located within 20 m of Memorial Avenue. Further details regarding the location, dimensions, design and illumination of all signage will be confirmed at the substantive application stage.

1.2 Supporting Information

The referral application is supported by the following plans, technical assessments and other information:

Attachment	Document
Attachment 1	Planning Memorandum – Costco Christchurch Project Referral Application
Attachment 2	Costco Christchurch Indicative Concept Plan
Attachment 3	Subdivision Plans - Consented and Proposed
Attachment 4	Records of Title Combined
Attachment 5	Transport Assessment
Attachment 6	Infrastructure Design Report
Attachment 7	Soil Contamination - Technical Memo
Attachment 8	Economic Assessment
Attachment 9	Geotechnical Investigation and Report
Attachment 10	Urban Design Review
Attachment 11	Natural Hazards - Technical Memo
Attachment 12	Engagement and Consultation Record

2.0 Site Context

2.1 Site and Surrounds

The application site is located within Christchurch City Council (CCC) area and has a combined size of approximately 17.68ha. The site comprises four land parcels bounded by Memorial Avenue to the north, Avonhead Road to the south, with Russley Road (SH1) to the west (**Figure 2**).

The land at 540 Avonhead Road (Sec 1 SO 506443) and 455 Memorial Avenue (Lot 2 DP 74459) are owned by separate parties and do not form part of this referral application.



Figure 2: Site Location

The site is bounded on the northwest by the Memorial Avenue, Russley Road intersection including the Russley Road overbridge. The Russley Golf Club and Sir William Pickering Drive Business Park are across Memorial Avenue to the northeast.

The site is currently grassed vacant land with one rural lifestyle dwelling on 520 Avonhead Road. The dwellings at 400 Russley Road and 500 Avonhead Road have since been removed. Historically, the land has been used for rural lifestyle, agricultural and horticultural purposes.

The site is generally flat, with gently undulating ground levels. Overall, the site has a low gradient, reflecting the typical alluvial plains topography of the area.

Russley Road (SH1) borders the western boundary of the site. The surrounding environment comprises a mix of rural lifestyle, golf course, guest accommodation and light commercial activities associated with the Specific Purposes (Airport) Zone including the Christchurch City Airport.

To the southeast of the site are existing and established residential areas, including low-density residential neighbourhoods and Burnside Park. To the southwest are rural lifestyle properties within the Rural Urban Fringe Zone.

The site is in an area where connections to existing infrastructure networks are available (water and sewer), with favourable ground conditions to enable stormwater to be managed on-site through soakage.

The site is well connected to the surrounding road network and is served by established public transport services along Memorial Avenue.



Figure 3: Site from Memorial Avenue (top), Russley Road (middle) and Avonhead Road (bottom) - Google Maps Feb 25

2.2 Records of Title and Interests

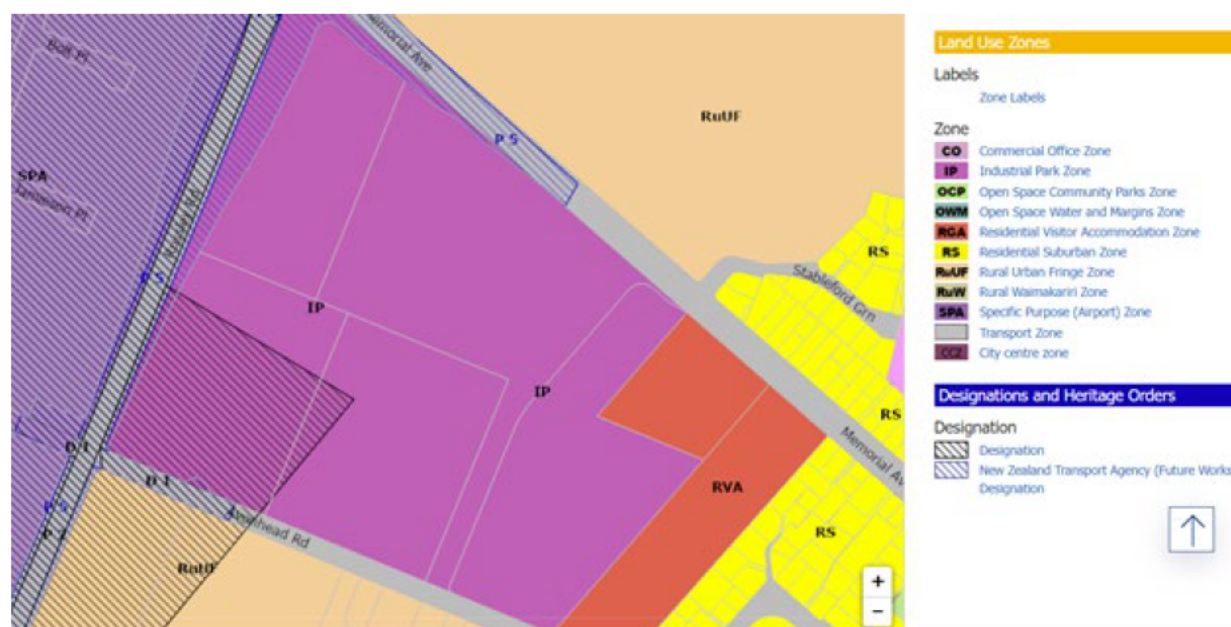
Table 1: Application site's legal descriptions

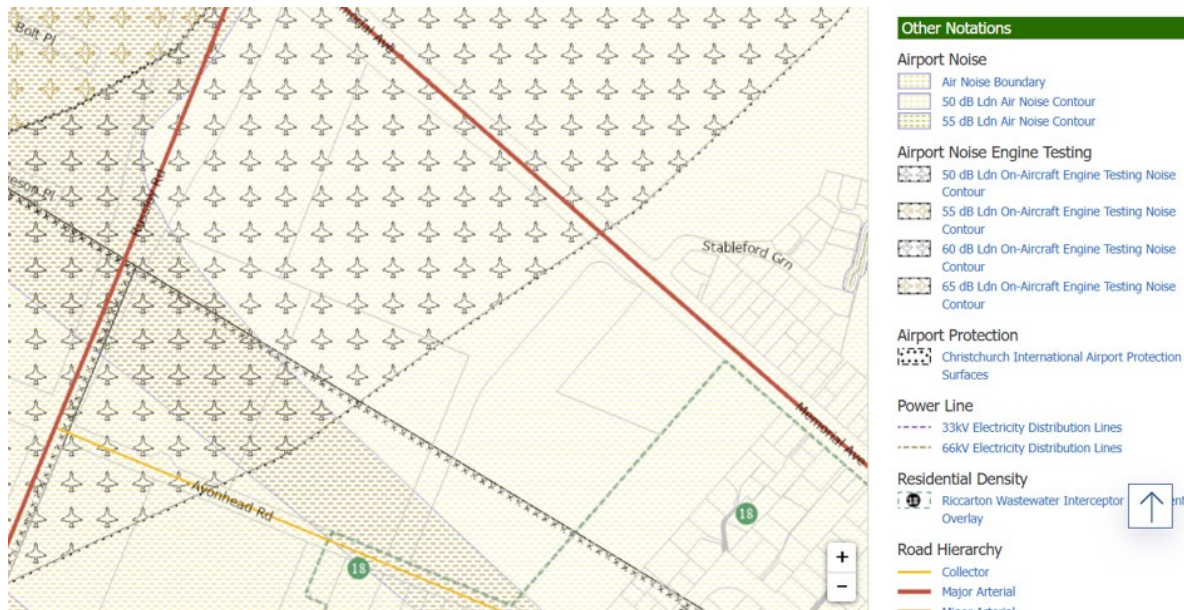
Address	Appellation	Record Title	of	Landowner Name	Area	Council
400 Russley Road, Burnside, Christchurch, Canterbury, 8042, NZL	Sec 8 SO 544350	1006889		Miles Premises Limited	2.9689 hectares more or less	Christchurch City Council
475 Memorial Avenue, Avonhead, Christchurch, Canterbury, 8042, NZL	Lot 2 Deposited Plan 553686	1006888		Miles Premises Limited	6.2931 hectares more or less	Christchurch City Council
520 Avonhead Road, Avonhead, Christchurch, Canterbury, 8042, NZL	Lot 5 Deposited Plan 28780	CB10K/321		Miles Premises Limited	4.0476 hectares more or less	Christchurch City Council
500 Avonhead Road, Avonhead, Christchurch, Canterbury, 8042, NZL	Lot 1 Deposited Plan 553686	962153		Miles Premises Limited	4.3745 hectares more or less	Christchurch City Council

The Records of Title for the site are subject to a number of interests. A summary of these and the title documents are included in (Attachment 4). There are no interests which will prevent the proposed works from being undertaken.

2.3 Christchurch District Plan

The site is zoned Industrial Park and is subject to the Industrial Park Zone (Memorial Avenue) Outline Development Plan.





Figures 4A and 4B: Christchurch District Plan Maps showing Industrial Park (Memorial Avenue) Zone, airport notations. Site outlined in red.

A portion of 520 Avonhead Road (Lot 5 DP 28780) is located within the Airport Runway End Protection Area. The site is also affected by Christchurch International Airport Air Noise Contours, Engine Testing Noise Contours as shown on Figure 4B and the Christchurch International Airport Bird Strike Management Area (located within 3km of the thresholds of runways as shown on Christchurch District Plan, Appendix 6.11.7).

The parcels recently dedicated as Road to the immediate north and west of the application site have a Waka Kotahi NZ Transport Agency (Future Works Designation) (Section 2 SO 544350, Section 3 SO 544350, and Section 3 SO 459308). This area was part of a recent road taking exercise by Waka Kotahi NZ Transport Agency and CCC.

In addition to the zoning under the Christchurch District Plan, the Site is also identified as a Greenfield Priority Area: Business in the Canterbury Regional Policy Statement (on Map A).

Memorial Ave Outline Development Plan (ODP)

Subdivision, use and development is required to be undertaken in accordance with the Industrial Park Zone (Memorial Avenue) ODP, contained in Appendix 16.8.15 of the District Plan and is reproduced in **Figure 5** below. The ODP identifies the key structuring elements for the development of the area, including the location and configuration of key transport connections. The proposal retains the principal Memorial Avenue access framework and provides the planned connections to adjoining land, together with a connection to Avonhead Road. A high-level assessment of the proposal against the ODP is provided in Section 6.3.2.

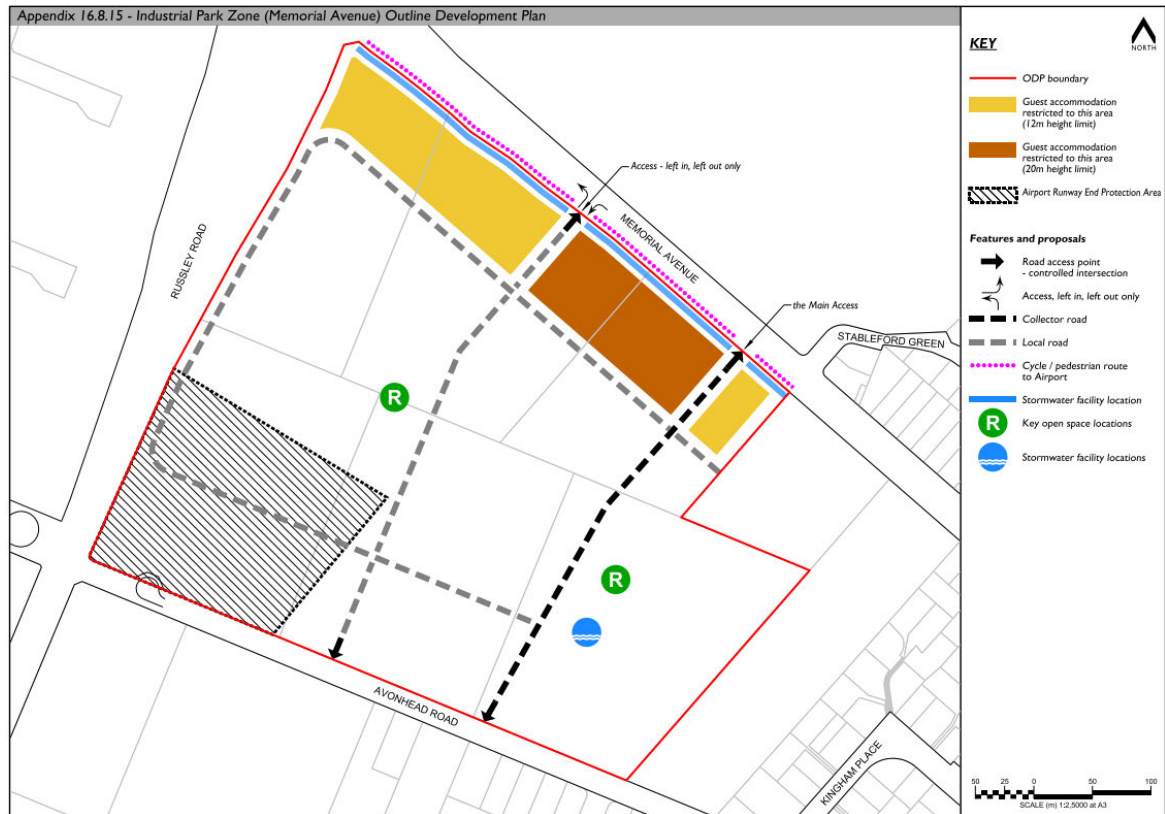


Figure 5: Christchurch City Council Appendix I6.8.15 Industrial Park Zone (Memorial Avenue) Outline Development Plan

Roading overlays

Russley Road and Memorial Avenue are identified as Major Arterial Roads with Avonhead Road classified as a Collector Road within the CDP's roading hierarchy.

Natural Hazard, Cultural and Heritage overlays

There are no natural hazard, cultural or heritage overlays applying to the site under the District Plan.

The site is partially subject to the 10- 50- and 200- year flood extent as illustrated on the CCC Flood and Floor Level Viewer.

3.0 Regional Significance of the Project

The FTAA has established a framework that differs from the Resource Management Act 1991. The matters outlined in Sections 22(1)(a) and 22(2)(a) of the FTAA direct the considerations available to the Minister when assessing a project's eligibility for referral.

Costco Christchurch Project will deliver significant regional benefits relevant to the considerations in Section 22 of the FTAA. The key regional benefits of the Project include:

- Significant economic investment and employment, arising from the construction and ongoing operation of the Costco Christchurch Project;
- Increased grocery competition and consumer choice through the establishment of Costco's first South Island warehouse and an alternative retail and wholesale offering;
- Opportunities for local businesses and suppliers, including wholesale purchasing and potential supply opportunities for Canterbury and South Island producers;
- Productive use of underutilised urban land in a strategically located and well-connected area close to State Highway 1 and Christchurch International Airport;
- Timely delivery of significant regional investment, enabling the associated economic, employment and consumer benefits to be realised sooner; and
- Opportunities to support climate change mitigation through energy-efficient design, lower-emission technologies and transport initiatives.

These matters are assessed in further detail against the relevant Section 22 criteria in Section 3.1 below.

3.1 Criteria for assessing referral application

We respond to the relevant Section 22(2)(a) considerations for the Costco Christchurch Project below.

Section 22(2)(a)(i) – has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list:

While the Costco Christchurch Project is not explicitly listed as a priority in a central government, local government, or sector plan or strategy, it fits well with the strategic intent to attract business and investment to the Christchurch Region. It also aligns fully with the Government Policy Statement - Grocery Competition (GPS) objectives. In this regard, the project aligns with the FTAA purpose of accelerating projects that deliver significant regional benefits, as set out below.

Section 22(2)(a)(iv) – will deliver significant economic benefits

The economic report by Insight Economics Limited (**Attachment 8**) quantifies the economic impacts of the development. Total project investment is estimated at approximately \$90 million, with construction expected to support approximately 350 FTE-years of employment, \$31 million in wages and salaries, and \$63 million in GDP within Canterbury.

Once operational, the project is estimated to directly employ approximately 400 FTEs across the Costco warehouse and complementary large format retail, and support approximately 486 FTEs, \$32 million in wages and salaries and \$56.6 million in GDP per annum once supply-chain effects are included.

The economic report also identifies significant wider economic benefits associated with the proposal, including increased grocery competition and consumer welfare, opportunities for local suppliers and small businesses, productive use of currently underutilised land, and the acceleration of significant investment and associated economic activity.

Overall, based on the economic report, the proposal will:

- Generate significant construction investment, employment, wages and regional GDP;
- Sustain substantial permanent employment and economic activity once operational;
- Improve grocery competition and consumer choice by establishing Costco's first South Island warehouse and introducing an underrepresented wholesale club format to the regional market;
- Provide additional wholesale purchasing opportunities for small businesses and opportunities for Canterbury and South Island suppliers;
- Put currently underutilised land to productive economic use with negligible economic opportunity cost; and
- Enable the economic and consumer benefits associated with Costco's investment to be realised sooner through the fast-track process.

The economic assessment concludes that the project would deliver significant regional and national economic benefits and performs strongly against the relevant FTAA referral criteria. For these reasons, the proposal satisfies Section 22(2)(a)(iv) by delivering significant economic benefits.

Section 22(2)(a)(vii) – will support climate change mitigation, including the reduction or removal of greenhouse gas emissions:

The proposal will support climate change mitigation through the efficient development of a strategically located site within the existing Christchurch urban environment, adjacent to the State Highway network and accessible by a range of transport modes. Existing bus services operate along Memorial Avenue, including Routes 3, 29 and 125, with bus stops located close to the site. The surrounding transport network also provides opportunities for pedestrian and cycle access to the site. While private vehicle access will remain important for Costco's destination-based and bulk-buy model, public transport, walking and cycling provide alternative means of access for staff and customers, particularly to the complementary large format retail activities.

At a building and infrastructure level, and as set out at section 5.10 of this memorandum there will be opportunities through detailed design to incorporate energy-efficient design, renewable energy solutions, water efficiency and other lower-emissions technologies as the design is further developed. Efficient servicing and stormwater solutions will also contribute to the overall environmental performance of the development.

Landscaping provides opportunities to support biodiversity and stormwater management. There will also be opportunities through detailed design and construction to reduce embodied carbon, construction waste and construction-related emissions, and to support lower-emission transport options.

Overall, the proposal provides opportunities to incorporate measures across building design, infrastructure, landscaping, transport and construction that support climate change mitigation and reduce greenhouse gas emissions.

Section 22(2)(a)(ixa) – will promote competition in the grocery industry:

Section 22(2)(a)(ixa) of the FTAA expressly identifies whether a project will promote competition in the grocery industry as a matter relevant to determining whether it will have significant regional or national benefits. In addition, under Section 22(1A), the Minister must consider any relevant Government Policy Statement when making that assessment.

In December 2025, the Government amended the FTAA to establish a more direct consenting pathway for new grocery developments and to clarify that grocery projects capable of improving competition at a national or regional level may access the fast-track approvals process. In conjunction with these amendments, the Government issued the GPS – Grocery Competition, which sets out the Government’s objectives and priorities for improving competition in New Zealand’s grocery sector.

Groceries represent a significant proportion of household expenditure in New Zealand. New Zealand consumers spent approximately \$27.4 billion on groceries in the year ended June 2025, compared with \$26.8 billion in the previous year and \$25.2 billion in the year before that¹. Food is the second-largest category of household expenditure after housing. New Zealand also has the fifth-highest grocery expenditure per capita in the OECD, while domestic food prices are approximately three per cent higher than the OECD average².

The New Zealand grocery sector remains highly concentrated, with the major grocery retailers collectively accounting for more than 80 per cent of the market. The Government has identified increased competition as an important means of placing downward pressure on prices, improving product quality and range, encouraging innovation, and providing consumers with greater choice.

The GPS - Grocery Competition indicates that fast-track support should focus on projects that reduce market concentration, enable scalable competition, support regional or multi-site expansion, and provide footholds for new competitors. The Costco Christchurch Project is consistent with each of these outcomes as follows:

Reduce market concentration. Proposals from new entrants or existing players not materially connected to dominant grocery chains.

Costco is an independent grocery and general merchandise retailer and is not materially connected with New Zealand’s major supermarket groups. Costco’s expansion would introduce an additional large scale independent competitor and increase competitive pressure in a grocery market that remains highly concentrated.

Costco opened its first New Zealand warehouse at Westgate, West Auckland in September 2022 and quickly experienced strong demand, with approximately 150,000 New Zealand members joining within its first year of operation. Following the success of the Westgate warehouse, Costco is progressing plans for a second warehouse at Drury in South Auckland.

The proposed Christchurch warehouse would be Costco’s first location in the South Island and therefore extend the competitive effects of Costco’s retail model into a new regional market. The Christchurch urban area is currently served predominantly by the established supermarket groups, together with a smaller number of independent, specialist, and alternative-format retailers. The introduction of a large-scale Costco

¹ Statistics New Zealand ‘Retail trade survey: June 2025 quarter’.

² New Zealand Commerce Commission Annual Grocery Report 2024.

warehouse would provide consumers and businesses with access to an additional grocery retailer operating at a scale to increase competitive pressures.

The proposed Christchurch location is well suited to Costco's operating model. Its accessibility and proximity to State Highway 1 would enable the warehouse to serve a large regional catchment and accommodate the destination-based nature of Costco shopping trips. A freestanding Costco warehouse typically serves a catchment of around 700,000 people or more, with approximately 80 per cent of sales drawn from within roughly a 30-minute drive. This broad catchment means that the project's competitive effects would be spread across a wide range of retailers and locations rather than concentrated on a single centre or store.

Enable scalable competition. Projects that support businesses capable of competing at a regional or national level, including:

- Limited assortment stores, supercentres, wholesale clubs, or other formats currently underrepresented in New Zealand.
- Infrastructure such as warehousing, logistics, and online retail support.

Costco operates a membership-based wholesale club format that is underrepresented in New Zealand compared with conventional supermarkets. A typical warehouse carries only around 4,500 product lines at any one time, compared with 30,000 or more at a full-line supermarket, with many products sold in bulk pack sizes two to six times larger than comparable supermarket items. Its membership revenue supplements merchandise margins, allowing Costco to sustain comparatively low margins and a structurally low-price offer.

Costco is recognised internationally for delivering value and convenience to its members. Its shopping pattern is also materially different from conventional supermarkets: Australian evidence indicates that members visit around eight times per year on average and spend more than s 9(2)(b)(iii) per transaction. Costco therefore generally operates as an additional, occasional destination-style shopping trip rather than a substitute for the weekly supermarket shop.

It would also provide small businesses, hospitality operators, community organisations, and other commercial customers with an additional wholesale purchasing option. Around 30 per cent of Costco's sales are made to business members, including independent restaurants and takeaway outlets, small supermarkets and convenience stores, childcare and education providers, hotels and motels, caterers, personal services businesses and small construction firms. Many of these customers would otherwise obtain supplies from dedicated wholesalers, meaning the warehouse would provide an additional wholesale channel and could reduce input costs for small businesses.

The project would also support competition beyond the customer-facing warehouse through its distribution, freight, storage, inventory management and supplier functions. Costco warehouses increasingly operate as fulfilment points for online sales and perform a quasi wholesale and distribution role in addition to in-store retail. This operational character aligns closely with the warehousing, logistics and online retail support infrastructure contemplated by the GPS - Grocery Competition.

As a Costco fuel facility forms part of the proposal, Australian research also indicates a 'Costco Effect', whereby competing fuel stations within approximately five kilometres respond by reducing prices.

Support multi-site or regional expansion. Proposals involving multiple builds across regions or within a single region that contribute to broader competitive effects.

The Christchurch proposal represents a significant regional expansion of Costco's New Zealand operations. Christchurch is New Zealand's second-largest city and the principal urban and economic centre of the South Island. Following Westgate and the planned Drury warehouse, Christchurch would establish Costco's first South Island location and extend its presence into a substantial new regional market. Its strategic transport accessibility would allow it to serve customers across Christchurch and Canterbury, as well as customers travelling from elsewhere in the South Island.

An additional warehouse can support increased brand recognition, a larger membership base, improved supplier relationships, more efficient logistics and stronger purchasing capability. South Island consumers and businesses currently do not have practical access to a physical Costco warehouse. A Christchurch location would therefore provide direct access to Costco's retail and wholesale model for a substantial new customer base while supporting broader efficiencies across Costco's New Zealand network.

Provide footholds for new competitors. One-off developments that help smaller or newer businesses grow and compete more effectively.

While Costco is a large international retailer, it is a relatively new entrant to the New Zealand grocery sector. It currently has a single operating warehouse at Westgate, with a second North Island warehouse planned at Drury.

Costco has not yet achieved the geographic coverage or store network of the dominant grocery retailers. A Christchurch warehouse would establish Costco's first physical foothold in the South Island and provide a platform from which to develop its South Island membership, supplier relationships, distribution capability and customer base.

A South Island foothold is important because the distance between Auckland and the main South Island population centres creates practical limitations for consumers and businesses seeking to access Costco's existing warehouse. Establishment in Christchurch would overcome that geographic constraint and extend meaningful competition from Costco's distinctive wholesale club model to the South Island for the first time.

The project may also create opportunities for Canterbury and South Island suppliers. Costco sources from local producers in markets in which it operates, and its international warehouse network can provide suppliers with opportunities beyond an individual store. Australian producers, for example, supply products including meat and dairy through Costco into Asian markets. Comparable opportunities for New Zealand suppliers would depend on commercial arrangements but could develop as the Christchurch warehouse establishes its supply chains.

The complementary large format retail component does not itself form the basis of the grocery-competition case. Rather, its significance in this context is that it supports the establishment of an integrated destination around the principal Costco grocery operation, broadening the range of household shopping needs capable of being met at the site and contributing to customer draw, repeat visitation, destination functionality and commercial resilience. The coordinated development also enables efficient shared use of access, parking, servicing and supporting infrastructure. In this way, the complementary large scale retail supports the successful establishment and enduring competitiveness of Costco's first South Island warehouse and reinforces, rather than displaces, the project's principal grocery-competition rationale.

Overall, the proposed Christchurch Costco will promote competition in the grocery industry by introducing an additional large-scale independent competitor to the South Island, extending Costco's geographic reach

and providing a platform for increased competition across both the retail and wholesale grocery sectors. The proposal therefore aligns closely with the outcomes identified in the GPS – Grocery Competition and satisfies Section 22(2)(a)(ixa).

Section 22(2)(a)(x) – is consistent with local or regional planning documents, including spatial strategies:

In addition to supporting the Government’s grocery competition objectives, Costco Christchurch Project is consistent with the relevant local and regional planning documents, as set out in Section 6.4 below.

3.2 Benefit of the Fast-Track Approvals Act (2024) for the Costco Christchurch Project

As outlined in FTAA Section 22(1)(b)(i) and (ii), part of the determination for accepting a referral application includes outlining whether the FTAA (2024) process would facilitate a more efficient and timely delivery of the project.

(b) referring the project to the fast-track approvals process—

i. would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and

ii. is unlikely to materially affect the efficient operation of the fast-track approvals process.

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

- Under the FTAA, expert panels will consider required approvals as a single, integrated application package, as opposed to the standard process where multiple applications would be required across different authorities;
- Under the FTAA, public and limited notification is precluded, expert panels are only permitted to invite comments from specified persons who have a short timeframe to provide comment. Given the scale and nature of this development, and the range of approvals required, progressing the project through conventional RMA processes would involve multiple consent applications, potential notification, extended statutory processes and appeal rights, resulting in materially greater consenting time, cost and uncertainty;
- Under the FTAA, timeframes are shorter and stricter than that of the normal process resulting in significantly less time for obtaining resource consent and efficiencies for the project; and
- There is resourcing in place to process the application efficiently and certainty around timeframes for the applicant to ensure the project remains ‘shovel ready’.

As outlined in Section 4. below, the Costco Christchurch Project requires a range of resource consents (land use, subdivision, discharge) from CCC and the Canterbury Regional Council (CRC) and potential approvals under the Wildlife Act 1953. The ability to apply for a comprehensive range of consenting requirements within one application, to be considered by one panel, offers significant efficiencies in planning and specialist inputs.

Referral of the project to the fast-track approvals process is unlikely to materially affect the efficient operation of the FTAA process. The Costco Christchurch Project can be lodged as a complete, well-scoped

application with the necessary technical inputs to support efficient expert panel consideration. Its scale and benefits are commensurate with the intended use of the FTAA pathway.

3.3 Relevant Background

3.3.1 Christchurch City Council Consents

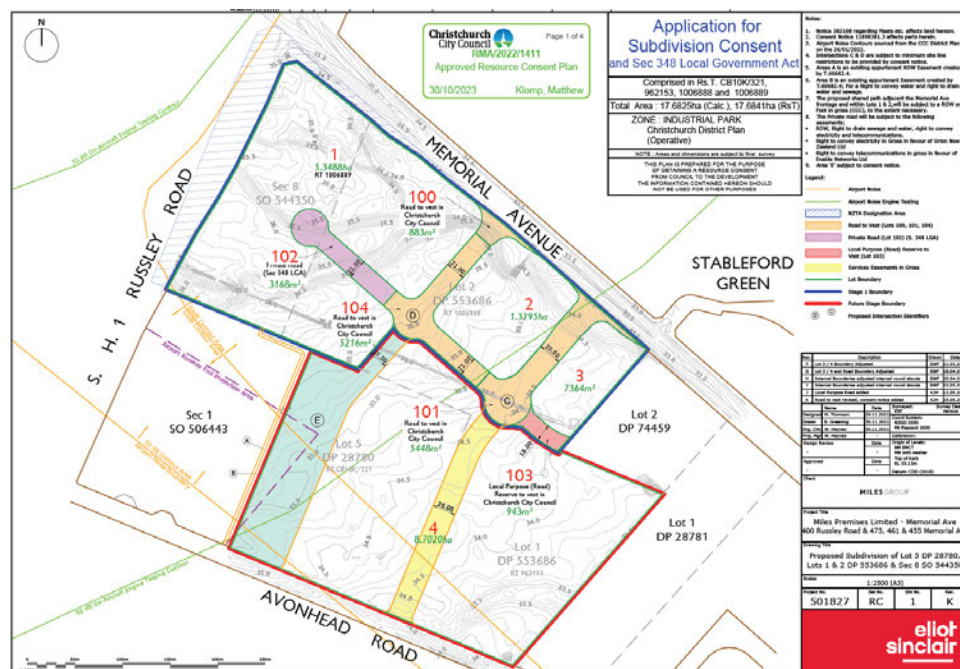
The following resource consents and applications with CCC are relevant to the subject site. These consents are in the name of the landowner, and joint applicant, Miles Premises Limited. If changes to the below consents are enabled under s127 of the RMA, Miles Premises being the consent holder would hold these updated consents. Or new applications could be sought as per Section 4.2 below.

RMA/2022/1411- Application for land-use consent, subdivision consent, and cancellation of consent notices.

Christchurch City Council granted subdivision and land use consent RMA/2022/1411 in October 2023 for the subdivision and development of the four existing titles. The consent provides for the creation of development lots, public and private roads, associated servicing and access arrangements, earthworks and the removal and replacement of street trees along Memorial Avenue. An amendment under Section 133A of the RMA was subsequently issued in November 2023 to correct minor wording and reference errors.

The approved subdivision establishes the underlying subdivision and infrastructure framework for the site. This includes service easements and a 2.5 m wide shared path easement along the Memorial Avenue frontage, together with requirements secured through amendment to Consent Notice 11898381.3 relating to matters including the urbanisation of Avonhead Road, road formation and access, geotechnical and foundation design, and wastewater and stormwater servicing.

The consent also authorises approximately 120,100m³ of earthworks across the first stage of the development (Lots 1–3), with Lot 4 generally excluded other than for the stockpiling of surplus topsoil. The approved subdivision is shown in **Figure 6** below.



The Costco Christchurch Project requires amendments to aspects of the approved subdivision and associated approvals, including the lot and roading layout, easements, earthworks and provisions of Consent Notice 11898381.3. The approvals required to facilitate these changes, including whether they are addressed through variation of the existing consent or a new consent, are described in Section 4 below.

RMA/2022/1968- Application for land-use consent to establish an automotive sales franchise

RMA/2022/1968 is a land use consent application for automotive sales franchises and associated showroom, office and workshop facilities on part of the wider site. The application was lodged in June 2022 and remains on hold. The proposed automotive sales activity relates to a separate part of the wider development (proposed Lots 1 and 2) and does not geographically overlap with the proposed Costco Christchurch Project. The proposed layout is shown in **Figure 7** below.



Figure 7: RMA/2022/1968 Proposed automotive sales franchise land use activity – on hold.

3.3.2 Canterbury Regional Council (CRC) Consents

CRC224947 - Construction phase stormwater discharge to land

CRC224947 (granted in November 2022) authorises construction phase stormwater discharges associated with the previously approved subdivision works. The extent to which that consent can be relied upon, varied, transferred or replaced for the Costco Christchurch Project will be confirmed by Eliot Sinclair and CRC before substantive lodgement. The consent currently authorises construction-phase stormwater discharges associated with the earthworks and infrastructure approved under RMA/2022/1411.

Operational stormwater discharges from roads that will ultimately vest in Christchurch City Council are anticipated to be covered by the Council's Global Stormwater Discharge Consent (CRC190445). This will be confirmed as part of the substantive application and in consultation with CRC.

3.3.3 Competing applications or existing resource consents for the same activity

Section 17 of the FTAA enables the Minister to invite comments from a local authority where an existing application would be a competing application if a substantive application for the project were lodged. The existing consents and applications relating to the site are not considered to be competing applications for the purposes of the FTAA.

RMA/2022/1968 relates to separate automotive sales activities that do not geographically overlap with the proposed Costco Christchurch Project. Those activities can be independently serviced and do not rely on the same development area or infrastructure in a manner that would make the applications competing. .

RMA/2022/1411 establishes the existing subdivision framework for the site and is proposed to be amended to facilitate Costco Christchurch Project.

CRC224947 relates to construction-phase stormwater discharges associated with that approved subdivision and may similarly be amended or replaced as part of the substantive application.

4.0 Approvals and Reasons for Consent

4.1 Christchurch District Plan

At this stage, we understand that resource consent will be required under the Christchurch District Plan rules listed below. This list is not exhaustive and is based upon the information available to date. Further consent triggers may be identified as the proposal develops.

Chapter 6 General Rules and Procedures

- Chapter 6.1 Noise – resource consent may be required for exceeding construction noise standards under Chapter 6.1.
- Chapter 6.3 Outdoor lighting may exceed the permitted activity standard. If so, resource consent would be required under Chapter 6.3.

Chapter 6 Signs

- Any sign that does not meet one or more of the permitted activity specific standards would require consent for a **Restricted Discretionary Activity** under Rule 6.8.4.1.3 RD1-RD4.
- Any sign within the 20m setback from Memorial Avenue under Rule 6.8.4.1.1 P16 that does not meet one or more of the activity specific standards would also need consent for a **Restricted Discretionary Activity** under Rule 6.8.4.1.3 RD4.

Chapter 7 Transport

- Any activity that does not meet any one or more of the standards in Rule 7.4.2.3 'Standards - Transport (All zones outside the Specific Purpose (Lytelton Port) Zone)' would require resource consent as a **Restricted Discretionary Activity** under Rule 7.4.2.3 RD1.
- Any activity that requires resource consent in accordance with Rule 7.4.3.10 High Trip Generators requires resource consent as a **Restricted Discretionary Activity** under Rule 7.4.2.3 RD1.

Chapter 8 Subdivision, Development Earthworks

Subdivision

- The proposal is likely to include a boundary adjustment which changes each lot area by more than 10% and is classified as a **Restricted Discretionary Activity** under Rule 8.5.1.3 RD1.
- The proposal may involve subdivision in the Industrial Park Zone (Memorial Avenue) that does not meet one or more to the relevant standards which is a **Restricted Discretionary Activity** under Rule 8.5.1.3(RD2).
- The proposal will involve a subdivision to create allotments for access, utilities, roads and reserves and is classified as a **Controlled Activity** at Rule 8.5.1.2 C4.

- Subdivision in any area subject to an outline development plan, the Memorial Avenue Outline Development Plan is classified as a **Controlled Activity** under Rule 8.5.1.2 C5.

Earthworks

- The proposed earthworks will exceed the permitted volume and depth and therefore resource consent will be required under Rule 8.9.2.3 RD1 as a **Restricted Discretionary Activity**.

Chapter 9.4 Significant and Other Trees

- As part of the underlying subdivision consent approval was provided under Rule 9.4.4.1.3 RD4 as a **Restricted Discretionary Activity** to remove and replace 18 trees within the Memorial Avenue road corridor.

Chapter 16 Industrial Park Zone

- If any activity does not meet one or more of the built form standards, then resource consent for a **Restricted Discretionary Activity** is required under Rule 16.6.1.3 RD1
- Any activity not provided for as a permitted, controlled, restricted discretionary, non-complying or prohibited activity in the Industrial Park Zone is a **Discretionary Activity** under Rule 16.6.1.4(D1).

Chapter 16 Industrial Park Zone (Memorial Avenue)

- A service station is a **Permitted Activity** (subject to meeting applicable activity and performance standards) as per Rule 16.6.6.1. (Area Specific Permitted Activities) which cross reference to Industrial Park Zone Rule 16.6.1.1 P9 (Service Stations) Any building located between 20m and 50m of Memorial Avenue is a **Controlled Activity** under Rule 16.6.6.1.2 C1.
- If a permitted activity does not meet one or more of the built form standards, then resource consent for a **Restricted Discretionary Activity** is required under Rule 16.6.6.1.3 RD1.
- A supermarket and associated buildings are a **Discretionary Activity** in Rule 16.6.1.4 D1 (applying throughout the Industrial Park Zone (Memorial Avenue) through 16.6.6) on the basis it is not provided for as a permitted, controlled, restricted discretionary, non-complying or prohibited activity.
- Retail activity and associated buildings are a **Discretionary Activity** in Rule 16.6.1.4 D1 (applying throughout the Industrial Park Zone (Memorial Avenue) through 16.6.6) on the basis it is not provided for as a permitted, controlled, restricted discretionary, non-complying or prohibited activity.

4.2 Section 127 to Approved Subdivision Consent RMA/2022/1411

- Approval under Section 127 of the Resource Management Act 1991 (RMA) is required to vary the approved subdivision consent RMA/2022/1411 to facilitate the Costco Christchurch Project. An application under s127 is a **Discretionary Activity**.
- It is proposed to amend the subdivision plan from what is approved in **Figure 8** to that proposed in **Figure 9 (Attachment 3)** to facilitate the Costco Christchurch Project by:
 - Amending the roading layout to provide for a new formed road connection between Roundabout C and Avonhead Road (Lot 5). Lot 103 would vest with Council as a point strip (0.2m wide) adjoining neighbouring Lot 2 DP 74459 (455 Memorial Avenue). This would result in an amended Lot 4 and a new Lot 5, providing separate development areas for the Costco and additional Large

Format Retail Activities respectively. The revised layout enables the removal of the yellow service easement in Lot 4 as these would be accommodated within the new road (Lot 105).

- Providing a new formed road connection (Lot 106) off Roundabout D. Lot 108 would vest with Council as a point strip (0.2m wide) adjoining neighbouring Sec 1 SO 506443 (540 Avonhead Road) and consequential amendments to the area of Lot 1.
- Amending the consent notice to remove the 'no build' requirement in green Area E. This was intended to ensure a road connection to 540 Avonhead Road (Sec 1 SO 506443). This connection will be provided as new road Lot 106.
- Making other minor amendments such as amendment to the staging and lot boundaries, areas and associated consent conditions as necessary to give effect to the revised subdivision and development layout with more detail to be provided with the substantive application.

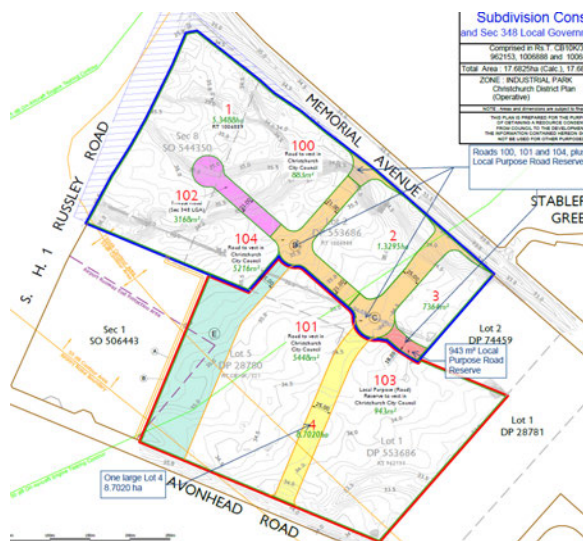


Figure 8: RMA/2022/1411 Approved Subdivision Layout

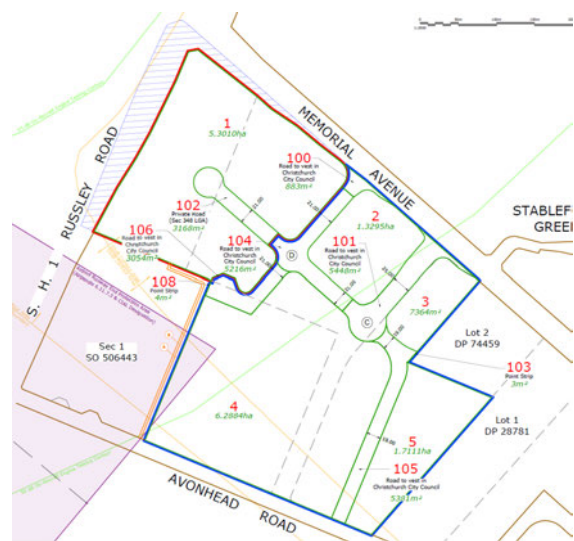


Figure 9: Amended Subdivision Layout

Regional Discharge Consent

A construction-phase stormwater discharge consent (CRC224947) was granted on 10 November 2022 as per Section 3.3.2. The consent has a five-year duration and expires on 10 November 2027.

Consenting Pathway for changes to RMA/2022/1411 and CRC224947

It is proposed that the above changes to RMA/2022/1411 and CRC224947 be sought as part of the substantive fast track application through:

- A s127 variation to the existing subdivision consent.
- If a s127 variation cannot be pursued through the fast-track process, a new consent will instead be sought.
- Either a s127 change to discharge consent CRC224947 or a new discharge consent having regard to the proposed earthwork area, expiry of the existing consent and the anticipated construction programme.

The referral decision could, if considered appropriate, include a condition or direction confirming the consenting pathway to be addressed through the substantive application. The approvals and reasons for consent identified in Section 4 address both potential consenting pathways.

4.3 s221(3) Change to a consent notice

Approval under Section 221(3) of the RMA may be required to vary or cancel a consent notice. An application under s221(3) is a **Discretionary Activity**.

Consent Notice 11898381.3 includes requirements relating to the upgrading and urbanisation of Avonhead Road and the provision of a shared path at Memorial Avenue, along with specific foundation design requirements. The consent notice was amended as part of RMA/2022/1411; however, further amendments may be required to reflect the Costco Christchurch Project and subdivision changes in Section 4.2 above.

4.4 Canterbury Land and Water Regional Plan

Dewatering during construction

- If required for deeper excavations, groundwater dewatering during construction would be a **Permitted Activity** under Rule 5.119 where the relevant conditions can be met. Where dewatering occurs from, into or onto contaminated or potentially contaminated land, or otherwise fails to meet the conditions of Rule 5.119, resource consent would be required as a **Restricted Discretionary Activity** under Rule 5.120.
- If excavation associated with the creation of a stockpile is required resource consent would be required under Rule 5.176 as a **Restricted Discretionary Activity**.

Construction Phase Stormwater Discharge

- Rule 5.94A relates to the discharge of construction-phase stormwater to land in circumstances where contaminants may enter groundwater. Although earthworks will be managed progressively, the overall construction area may exceed the permitted activity threshold. Accordingly, the proposal may require consent under Rule 5.94B as a **Restricted Discretionary Activity**. The precise consent requirement will be confirmed through the substantive application following further development of the earthworks methodology and consultation with CRC.

Operational Phase Stormwater Discharge

- Operational stormwater discharges from roads proposed to be vested in CCC are anticipated to be authorised under CCC's Global Stormwater Discharge Consent. The position for private roads and individual development lots will be confirmed with CCC and CRC as part of the substantive application. If any operational stormwater discharge cannot be authorised under an applicable global consent, the necessary discharge permit will be sought through the substantive fast-track application as per Rule 5.97 which is a **Non-Complying Activity**.

Section 5 – Bores

- If a new or existing bore is needed to obtain water for dust suppression then the installation, maintenance and use of a bore (other than a hydrological/geotechnical investigation or monitoring bore) is a **Permitted Activity**, provided all conditions are met. If a new bore doesn't meet the conditions in 5.103, then Rule 5.105 makes its installation, maintenance and use a **Discretionary Activity**.

Small and Community Water Takes

- If the groundwater take for dust suppression during construction does not meet the permitted activity standards of Rule 5.113 then resource consent will be sought as a **Restricted Discretionary Activity** under Rule 5.114A. Alternatively, if the water take exceeds 5L/s or 10m³ then resource consent will be sought either as a **Restricted Discretionary Activity** under Rule 5.128 or a **Non-Complying Activity** under Rule 5.129.

Stormwater not discharged from a Reticulated Stormwater System

Hazardous Industries and Activities and Hazardous Substances

- Vehicle refuelling, servicing and repair, including service stations and retail or commercial refuelling facilities, are identified as Hazardous Industries and Activities in Schedule 3.F.7.
- Oil and Fuel would be classified as a hazardous substances as per Schedule 4 Part A.
- Rule 5.181 provides for the use of land for storage and use of hazardous substances as a **Permitted Activity** if standards are met and a **Discretionary Activity** (Rule 5.182) if the use of hazardous substances listed in Part A of Schedule 4 does not meet the standards.

4.5 Canterbury Air Regional Plan (CARP)

- Rule 7.32 relates to the discharge of dust to air beyond the boundary of the property of origin from the construction of buildings, land development activities, unsealed surfaces or unconsolidated land, as a permitted activity provided the relevant conditions are met. The proposal is likely to be able to comply with all the conditions and be classified as a **Permitted Activity** under this rule.
- Rule 7.35 the discharge of contaminants into air from the handling of bulk solid materials from any stockpile of earthwork material. The proposal is likely to be able to comply with all the conditions and be classified as a **Permitted Activity** under this rule.
- Rule 7.36 The discharge of contaminants into air from the outdoor storage of bulk solid materials from any stockpile of topsoil on the site as part of the earthworks. The proposal is likely to be able to comply with all the conditions and be classified as a **Permitted Activity** under this rule.
- Rule 7.53 relates to the discharge of contaminants into air, including vapour ventilation and displacement, from the storage or transfer of petroleum products. This rule relates to the fuel facility and is a **Permitted Activity** where standards are met and a **Discretionary Activity** if conditions are not met.

4.6 National Environmental Standards – Consent Requirements

4.6.1 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS) establishes nationally consistent controls for activities on land where soil may be contaminated. A Technical Memo regarding Soil Contamination and Preliminary Site Investigation and Detailed Site Investigation (DSI) are in **Attachment 7** which show the site is subject to:

- A number of past HAIL activities across the site, including market gardening, backfilled excavations, stockpiles and a burn pad;
- Discrete areas of contamination, with contaminant concentrations generally within the applicable NES-CS criteria for commercial land use;
- Further sampling requirements associated with areas previously occupied by residential structures;
- A requirement for a Remedial Action Plan (RAP) for identified areas, including the burn pad at 520 Avonhead Road, gravel pit and the existing dwelling area; and
- A requirement for site validation investigations and reporting to confirm that contaminant concentrations within targeted areas meet the applicable standards for commercial land use.

The proposed change of use and associated soil disturbance will require consent under the NES-CS. Depending on the timing and extent of remediation and validation, the activity is anticipated to be either a **Controlled Activity** or **Restricted Discretionary Activity**.

Any necessary remediation, validation and consenting requirements can be addressed as part of the substantive application. On this basis, the potential risks to human health can be appropriately managed and mitigated.

4.6.2 National Environmental Standard for Freshwater

The Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F) regulate activities that may affect freshwater environments, including activities in or near natural inland wetlands, rivers and other freshwater features.

The application site is not known to contain any water bodies, however further investigations will be undertaken to confirm the presence or absence of any natural inland wetlands, waterways or other freshwater features within or adjoining the application site. The findings of those investigations will confirm whether any activities trigger consent requirements under the NES-F. Any necessary approvals will be identified and addressed as part of the substantive application.

4.7 Other Approvals

4.7.1 Wildlife Act 1953

The project may require approval under the Wildlife Act 1953 as DOC notes that there may be protected skinks that use the site. Specific site surveys will be required to determine the presence/absence of protected species. An assessment and engagement with the DOC will confirm whether an authority is required and the appropriate management, salvage, relocation or consent conditions to be addressed through the substantive application.

5.0 Description of Effects and Significance of those Effects

Section 13(4)(h) of the FTAA requires a description of anticipated and known adverse effects on the environment, and the significance of those effects.

The key anticipated and known adverse effects of the Costco Christchurch Project are described below, together with an indication of their significance. The assessment should be read alongside the supporting technical memoranda accompanying this application. Based on the investigations undertaken to date, no significant adverse environmental effects have been identified, and potential adverse effects are expected to be capable of being appropriately avoided, remedied or mitigated through detailed design, management measures and conditions at the substantive application stage.

5.1 Transportation Effects

Stantec has prepared a Transportation Assessment (**Attachment 5**) addressing the integration of the Project with the surrounding transport network.

Vehicle Access Assessment

The site is strategically well connected to the surrounding transport network, with direct connections to Memorial Avenue and SH1 and additional connectivity to the collector road network via Avonhead Road.

The principal transport framework has already been established through the Memorial Avenue Industrial Park Outline Development Plan and subsequent subdivision consent RMA/2022/1411. The Costco Christchurch Project substantially retains this framework, including the primary signalised Memorial Avenue access, secondary left-in/left-out Memorial Avenue access and internal collector road, while completing the planned connection to Avonhead Road.

The multiple access points also provide opportunities to distribute development traffic across the surrounding strategic and collector road networks.

Walking, Cycling and Public Transport

Existing bus services operate along Memorial Avenue, including Routes 3, 29 and 125, with bus stops located close to the site. The existing public transport network therefore provides an alternative means of accessing the development, with opportunities to improve pedestrian connections between the site and these services as the design is further developed.

Traffic Generation and Wider Network Effects

The site's transport framework has previously been assessed against a substantial full-site development scenario generating approximately 1,500 vehicle movements during the PM peak hour and 960 vehicle movements during the AM peak hour. Preliminary assessment indicates that PM peak-hour traffic generation associated with the current Costco Christchurch Project is likely to be broadly comparable with the scale of development previously assessed for the site.

Detailed assessment of traffic generation and distribution, intersection performance, parking and servicing, active-mode connectivity and any necessary transport mitigation will be undertaken at the substantive application stage.

Overall, Stantec concludes that no strategic transportation constraint has been identified that would preclude referral of the proposed Costco Christchurch Project. Further detailed analysis of transport matters will be undertaken through the substantive fast-track application.

5.2 Earthworks and Construction Effects

Contaminated Land

As outlined in the Soil Contamination Technical Memo (**Attachment 7**) localised areas of historical contamination associated with previous HAIL activities have been identified across the site. The investigations conclude that the site is suitable for the proposed commercial development, with identified contamination able to be appropriately managed through standard contaminated land management practices. The NES-CS applies to the project, and appropriate measures will be implemented during construction for the management, handling and disposal of any affected soils.

Earthworks, Stormwater and Dust

Earthworks will be required to establish the building platforms, access, parking, servicing and associated infrastructure (**Attachment 6**). These works have the potential to generate temporary erosion, sediment, stormwater and dust effects during construction.

These effects will be managed through standard construction practices and appropriate erosion, sediment and dust controls in accordance with relevant CRC and CCC requirements. Consideration will also be given to managing the extent of exposed ground, reducing the potential for dust generation, managing the volume and location of any stockpiles. Activities that may result in temporary ponding or site conditions that could attract birds and increase the bird-strike risk to aircraft operating in proximity to Christchurch International Airport will be managed. Detailed earthworks and construction management measures will be confirmed through the substantive application and detailed design.

Construction Noise, Vibration and Traffic

Construction activities will generate temporary noise, vibration and vehicle movements associated with site preparation, infrastructure installation and building construction. These effects will be managed through standard construction management measures and applicable construction standards.

Construction access and heavy vehicle movements will also be appropriately managed to maintain the safe and efficient operation of the surrounding road network.

Summary

Overall, construction effects will be temporary and typical of a development of this nature. They are not expected to be significant and can be appropriately managed through standard construction and site management measures.

5.3 Infrastructure and Servicing Effects

The proposed infrastructure and servicing arrangements are outlined in Section 1.1.2 and the Infrastructure Design Report (**Attachment 6**).

Water supply and wastewater

The site can be serviced through connections to the existing Christchurch City Council networks. Hydrant testing has confirmed sufficient water supply capacity and pressure to accommodate the anticipated development and firefighting demands, while a suitable connection to the existing wastewater network is available. Accordingly, no significant water supply or wastewater servicing constraints or adverse effects have been identified.

Stormwater

Potential effects principally relate to runoff and water quality. Stormwater will be managed through treatment and on-site soakage, with road and hardstand runoff treated prior to discharge and provision made for secondary flows. Detailed treatment, soakage and conveyance arrangements will be confirmed through detailed design.

Power and telecommunications

Initial consultation with service providers confirms that the development can be serviced through existing networks, subject to capacity remaining available at the time of connection and any necessary network upgrades. No significant servicing constraints have been identified.

Overall, no significant adverse infrastructure or servicing effects have been identified. Final servicing arrangements will be confirmed through the substantive application and detailed engineering design.

5.4 Geotechnical and Natural Hazard Effects

Geotechnical investigations have been undertaken by Eliot Sinclair & Partners Ltd (2021) in **Attachment 9**, together with a Natural Hazards memo in **Attachment 11**.

The investigations identify generally flat land underlain by alluvial soils, with some variable shallow ground conditions and areas of historic uncontrolled fill. These conditions do not preclude development and can be appropriately addressed through earthworks, ground improvement where required, and site-specific foundation investigation and design.

The site has a low susceptibility to erosion, falling debris and slippage. Finished floor levels and stormwater management will be incorporated into the detailed design to manage any residual risk.

Overall, the investigations conclude that there are no geotechnical or natural hazard constraints that would preclude the proposed development. Potential effects and risks can be appropriately managed through standard engineering design, construction and mitigation measures, and the Costco Christchurch Project is not anticipated to materially exacerbate natural hazard risk.

5.5 Retail Distribution Effects and Effects on existing centres

The Christchurch District Plan manages commercial activity through a centres-based approach, which gives primacy to the City Centre and seeks to support the role, function, viability and vitality of the established hierarchy of Town, Local, Neighbourhood and Large Format Centres.

The Economic Assessment (**Attachment 8**) concludes that the proposal is unlikely to give rise to significant retail distribution effects. Costco operates a distinctive membership-based bulk-buy model and serves a broad regional catchment, meaning its competitive effects will be widely dispersed rather than concentrated on any centre. Its destination style format complements rather than substitutes regular shopping patterns.

The additional large format retail forms part of the integrated Costco destination and will broaden the range of household shopping purposes capable of being met at the site, supporting customer draw, repeat visitation, destination functionality and commercial resilience. The Economic Assessment concludes that its effects are expected to be dispersed across the wider Christchurch retail market and, at the scale proposed, are unlikely to result in significant retail distribution effects or undermine the role or function of the established centres network. Further details including tenant-specific assessments will be provided at the substantive application stage.

5.6 Noise Effects

Operational noise effects are expected to be typical of large format retail activities and generally compatible with the surrounding environment. This includes servicing and delivery activities, including some early morning deliveries, which may occur within the site with appropriate separation from surrounding activities. Construction noise will be appropriately managed through standard construction management measures.

The proposal does not introduce noise-sensitive activities and is therefore not expected to give rise to reverse-sensitivity effects on Christchurch International Airport.

5.7 Cultural Effects

Ngāi Tahu are the tāngata whenua of Canterbury. The Mahaanui Iwi Management Plan 2013 provides guidance for land and resource management within the takiwā of the six Papatipu Rūnanga, including the recognition and protection of mana whenua values, use of indigenous species in landscaping, low impact urban design, and protection of wāhi tapu, wāhi taonga and waipuna.

The proposal provides opportunities to respond to these matters through indigenous planting and landscape design. Stormwater and erosion and sediment controls will also assist in managing potential effects on the surrounding environment. No wāhi tapu, wāhi taonga, waipuna or other sites of identified cultural significance have been identified within the vicinity of the works.

Further consideration of cultural values and effects is outlined in Sections 8 and 9. Further engagement is proposed through the detailed design and substantive application stages to better understand any cultural effects and inform landscaping, cultural design opportunities and other measures that recognise mana whenua values.

Te Ngāi Tūāhuriri Rūnanga has mandated Whitiara Centre Limited to act on its behalf in relation to environmental policy, strategic and resource management matters. Accordingly, ongoing engagement on the Project will be undertaken with Whitiara as the appropriate conduit for Ngāi Tūāhuriri.

5.8 Landscape, Visual, Character and Amenity Effects

A high-level urban design assessment has been prepared by Barker & Associates (**Attachment 10**). The assessment considers the structure and direction of the concept design, recognising that detailed architectural and landscape design will be developed further at the substantive application stage.

The site occupies a visually prominent location adjoining Memorial Avenue, which forms a key gateway and point of arrival between Christchurch International Airport and the City Centre. The surrounding environment comprises a diverse mix of industrial activities associated with the wider Airport Precinct, open space, visitor accommodation and residential activities.

The Industrial Park Zone anticipates large buildings and activities that are compatible with the nearby Airport, together with areas of open space and landscaping, particularly along Memorial Avenue in recognition of its gateway function. The proposed Costco warehouse and complementary large format retail activities are considered generally compatible with the larger buildings and infrastructure characteristic of the wider Airport area. The Costco Christchurch project proposes landscaping along Avonhead Road for a generous, landscaped edge to screen the Costco building and associated back-of-house service areas from adjoining rural-lifestyle properties. The proposed large format retail buildings also provide opportunities for frontage and activation onto Avonhead Road and are appropriately located in relation to the adjoining visitor accommodation activities.

While the proposal includes a substantial area of surface car parking, this is anticipated within the Industrial Park Zone and is appropriate having regard to the regional catchment served by the development. The Indicative Concept Plan (**Attachment 2**) consolidates parking centrally within the site, where it can ultimately be framed by development, and provides sufficient space for clear pedestrian routes and landscaping to break down its horizontal scale and contribute to site amenity.

Overall, the urban design assessment concludes that the proposal has clear urban design merit. The proposed activities and broad scale of development are compatible with the site's airport-influenced industrial context, and the Indicative Concept Plan establishes an appropriate basis for managing the site's principal interfaces, surface parking and future development. Further design development will be undertaken at the substantive application stage, particularly in relation to building architecture, landscape design, access from Memorial Avenue and pedestrian movement. Subject to these matters being appropriately resolved, the proposal is considered capable of achieving an appropriate urban design outcome.

5.9 Ecological Effects

The site is largely in pasture and contains no identified indigenous vegetation. Native lizards may be present within the site which may require a Wildlife Act Authority or could be managed by conditions of consent. This will be discussed further with DOC as more information is obtained. Any outcomes would then ensure, and if needed, appropriate species management, salvage and relocation measures are undertaken.

The proposal provides opportunities to enhance ecological values through landscape planting, with species selection to consider cultural and biodiversity values.

On this basis, ecological matters are not considered to represent a constraint to referral and can be appropriately addressed through conditions and approvals.

5.10 Greenhouse Gas Emissions Effects

The proposal will provide for a large format retail activities within an established urban and industrial environment, making efficient use of existing infrastructure and services. Provision will be made for future electric vehicle charging infrastructure, together with bicycle parking, end-of-trip facilities and improved pedestrian and cyclist access to support lower-emission transport options.

The development provides a range of opportunities to look at incorporating energy-efficiency measures, such as optimised building thermal performance, efficient lighting and HVAC systems with energy recovery, and an energy-efficient CO₂ refrigeration system. Provision may also be made for future installation of rooftop photovoltaic panels, with a target capacity of approximately 1MW. Appropriate metering and monitoring systems will assist with ongoing management of energy and utility consumption. Further details will be confirmed as part of the substantive application.

During construction, greenhouse gas emissions will be managed through efficient construction practices and material selection, including measures to reduce embodied carbon and a target of diverting at least 60% of construction and demolition waste from landfill, with an aspirational target of 80%.

Native landscaping and other measures to reduce the urban heat island effect will also be incorporated into the development. Overall, the proposed sustainability initiatives will assist in reducing greenhouse gas emissions associated with the construction and ongoing operation of the development.

5.11 Positive Effects

The proposal will result in a range of positive effects, including:

- Economic and employment benefits from the construction and ongoing operation of the Project.
- Increased grocery competition and consumer choice through Costco's first South Island warehouse.
- Benefits for local businesses and suppliers, including additional wholesale and supply opportunities.
- Efficient use of underutilised urban land within an established business area with good access to the strategic transport network.
- Amenity and infrastructure improvements through coordinated development, landscaping, servicing and transport connections.
- Environmental benefits and opportunities through stormwater management, planting and energy-efficient and lower-emission technologies.

Overall, the Project will contribute positively to the social and economic wellbeing of Christchurch, Canterbury and the wider South Island.

5.12 Mitigation

This memorandum, and the supporting memoranda from the technical experts, identify a range of measures to address potential adverse effects and ensure that those adverse effects are avoided, remedied or mitigated. This includes the application of standard and well-established mitigation measures and more bespoke approaches to manage the particular effects of this proposal. These can be addressed through design, conditions of consent, and monitoring.

6.0 Statutory Planning Framework

This section is provided in accordance with Clause 2(1)(a)(i) – (iii) of Schedule 5 of the FTAA. This requires that applications include an assessment of the activity against:

- (a) any relevant national policy statements; and
- (b) any relevant national environmental standards; and
- (c) If relevant, the New Zealand Coastal Policy Statement.

6.1 National Policy Statements

6.1.1 National Policy Statement for Natural Hazards 2025

The NPS-NH applies to flooding, landslip, coastal erosion, coastal inundation, active faults, liquefaction and tsunami natural hazards. The NPS-NH seeks to manage natural hazard risk associated with subdivision, use and development to people and property using a risk-based and proportionate approach, with the level of risk assessed in accordance with the NPS-NH.

A Natural Hazards Risk Assessment was prepared by Eliot Sinclair in April 2022 in support of the subdivision consent (RMA/2022/1411). While this assessment predated the NPS-NH it concluded that, while the site is subject to natural hazards typical of the wider Christchurch area, there are no unusual hazards or specific site conditions that would preclude development, and the site is suitable for development.

A subsequent technical memorandum has considered the relevance of the 2022 assessment to the current Costco Christchurch Project and confirms that there has been no material change to the physical hazard environment of the site. The previous assessment therefore remains relevant to the current proposal. The technical memorandum is provided in **Attachment 11**.

Natural hazard risks can be appropriately managed through the normal course of detailed subdivision and engineering design, consenting and construction, together with site-specific investigation and structural design under the Building Code where required.

Based on the assessments undertaken, it is considered that the natural hazard risks associated with the project can be appropriately managed and that the project is consistent with the NPS-NH.

6.1.2 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 (NPS-FM) provides direction for the management of freshwater, including prioritising the health and wellbeing of water bodies and freshwater ecosystems.

The project does not directly affect any identified surface water bodies. Stormwater generated by the development will be appropriately managed through treatment and on-site soakage, with runoff from roads and hardstand areas treated prior to discharge. Detailed stormwater design will be undertaken as part of the substantive application to ensure potential effects on freshwater are appropriately managed.

Accordingly, the project is considered consistent with the relevant direction of the NPS-FM.

6.1.3 National Policy Statement for Indigenous Biodiversity 2023

The National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB) seeks to protect, maintain and restore indigenous biodiversity.

The project is consistent with the relevant objectives and policies of the NPS-IB for the following reasons:

- The site is largely devoid of woody vegetation, contains no significant indigenous vegetation and is predominantly grassed with no identified protected trees. The proposal will continue to be designed to result in ecological gains through the provision of comprehensive landscaping.
- The applicant seeks to undertake engage with mana whenua in relation to the management and enhancement of indigenous biodiversity values, with engagement continuing as the project develops (Policy 2).
- The landscaping provides an opportunity to incorporate appropriate native species and enhance indigenous biodiversity values (Policies 13 and 14).

Based on the assessment above, it is considered that the project is consistent with the NPS-IB.

6.1.4 National Policy Statement on Urban Development 2020

The NPS-UD came into force on 20 August 2020 and replaced the National Policy Statement on Urban Development Capacity 2016. The NPS-UD focuses on achieving well-functioning urban environments, enabling urban development and intensification, supporting competitive land markets and improving housing affordability. The proposal is consistent with the NPS-UD for the following reasons:

- The proposal will contribute to a well-functioning urban environment by providing for significant commercial activity and employment opportunities within the existing Christchurch urban area, supporting the social and economic wellbeing of the wider community (Objective 1 and Policy 1).
- The proposal will make efficient use of urban land and existing and planned infrastructure. The site forms part of an established and developing urban and industrial environment and can be appropriately serviced by transport, three waters and other infrastructure.
- The proposal is supported by transport and connectivity improvements, including new road connections and improvements to the surrounding transport network. These improvements will assist in integrating the development with the wider urban environment and providing accessibility by a range of transport modes (Objective 6 and Policy 1).
- The proposal represents significant investment within an existing urban area and will enable development of land that is suitably located and able to be serviced. This is consistent with the NPS-UD's direction to provide sufficient development capacity and enable urban environments to develop and change over time in response to the diverse and changing needs of people, communities and future generations (Objectives 2 and 4 and Policy 2).
- The proposal will incorporate landscaping, stormwater management and transport measures through detailed design, including measures to support accessibility and transport choice. These measures provide opportunities to contribute to a high-quality and resilient urban environment (Objective 8 and Policy 1(e)).

Overall, the proposal will enable substantial commercial investment and employment within the existing Christchurch urban environment, make efficient use of urban land and infrastructure, and provide associated transport and servicing improvements.

Based on the assessment above, it is considered that the project is consistent with the NPS-UD.

6.1.5 National Policy Statement for Highly Productive Land

The National Policy Statement for Highly Productive Land 2022 (NPS-HPL) seeks to protect highly productive land for land-based primary production.

The site is already zoned for industrial purposes and is located within an established urban environment. The proposal therefore does not involve the rezoning of rural land for urban development or the expansion of the urban area into productive rural land. On this basis, the NPS-HPL is not considered to constrain the proposed development.

Based on the assessment above, it is considered that the project is consistent with the NPS-HPL.

6.1.6 National Policy Statement for Infrastructure 2025

The National Policy Statement for Infrastructure 2025 (NPS-I) provides direction for the planning, development and operation of infrastructure. While the project is not itself an infrastructure project, it requires connections and extensions to existing three waters, transport and utility networks.

As outlined in the Infrastructure Design Report (**Attachment 6**), the development can be appropriately serviced through existing networks and proposed extensions, with any necessary upgrades and final servicing arrangements to be confirmed through detailed design.

The project is therefore considered consistent with the relevant direction of the NPS-I.

6.1.7 National Policy Statement on Electricity Transmission

The application site does not contain land that is directly impacted by the NPS on Electricity Transmission.

6.1.8 National Policy Statement on Renewable Electricity Generation

The application does not relate to renewable electricity generation.

6.1.9 National Policy Statement on Greenhouse Gas Emissions from Industrial Process Heat

The application does not involve industrial process heat.

6.2 National Environmental Standards

6.2.1 National Environmental Standards for Air Quality

The Resource Management (National Environmental Standards for Air Quality) Regulations 2004 ('NES-AQ') establish national standards for managing air quality.

Potential air quality effects could result from dust generated during the construction phase. During pre-application engagement, CRC identified dust suppression as a matter requiring consideration, including confirmation of an appropriate water source given that the reticulated water supply does not currently extend to the site boundary. The potential use of existing on-site bores for dust suppression will be investigated further.

Appropriate dust suppression and management measures will be developed and incorporated into the relevant construction and erosion and sediment control plans. Any associated consent requirements and measures necessary to manage air quality effects will be confirmed as part of the substantive application.

6.2.2 National Environmental Standards for Freshwater 2020

Resource consents may be required under the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 ('NES-F') where works affect natural inland wetlands, waterways or fish passage. At this stage, no significant freshwater values have been identified within the application site; however, further investigations will be undertaken to confirm the presence or absence of any natural inland wetlands or waterways. The proposal involves substantial earthworks and associated stormwater management, and the findings of further investigations will confirm whether any activities trigger consent requirements under the NES-F. DOC has similarly recommended that specific surveys for wetlands and waterways be undertaken. Any necessary resource consents and associated effects will be identified and assessed as part of the substantive application.

6.2.3 National Environmental Standards for Sources of Human Drinking Water

The National Environmental Standard for Sources of Human Drinking Water ('NES-DW') seeks to protect sources of human drinking water from contamination and requires regional councils to consider potential effects on drinking water sources when assessing relevant resource consent applications.

The application site is located wholly within an urban area serviced by a public reticulated water supply, and the Infrastructure Design Report confirms that the development can be supplied from the CCC water network. Notwithstanding this, the applicability of the NESDW to any identified drinking water resource, including the nearby potable-water well, will be confirmed through the substantive technical assessment.

The proposed development will involve substantial earthworks and associated land disturbance. Consideration will therefore be given to the applicability of the NES-DW, including any potential effects associated with earthworks, dewatering (if required), stormwater discharges and the proposed fuel facility.

Based on the investigations undertaken to date, no effects on community drinking water supplies have been identified. The applicability of the NES-DW will be confirmed through the technical assessments prepared for the substantive application.

6.3 New Zealand Coastal Policy Statement

The New Zealand Coastal Policy Statement ('NZCPS') sets out objectives and policies for achieving the purpose of the RMA in relation to the coastal environment of New Zealand. The application site is not located in or near to the coastal environment. Accordingly, the NZCPS is not considered relevant.

6.4 Regional and District Planning Framework

6.4.1 Canterbury Regional Policy Statement

The Canterbury Regional Policy Statement (CRPS) is the overarching regional planning policy document for Canterbury. It identifies the region's significant resource management issues and provides strategic direction on matters such as urban growth, business development, infrastructure, transport, natural hazards, freshwater, biodiversity and tangata whenua values. It sits above the regional and district plans, which must give effect to its direction. Chapter 6 deals specifically with the Greater Christchurch area, and Chapter 5 includes policies for the Entire Region and Wider Region excluding Greater Christchurch. It is considered that the proposal aligns with the high-level strategic direction of the CRPS in the following ways:

- Urban form and business development: The proposal is consistent with Objective 5.2.1 which seeks consolidated, well designed and sustainable growth in and around existing urban areas and enables business activities in appropriate locations while maintaining the safe, effective use of regional infrastructure. The project develops land already identified for urban business purposes, makes use of existing and planned infrastructure and is located immediately adjacent to Christchurch's strategic transport network. It is within the existing urban area on land identified as a Greenfield Priority Area – Business and enables significant business investment and employment in an established business location (Objectives 6.2.1 and 6.2.6; Policy 6.3.1).
- Integrated transport and infrastructure: The site is well connected to Memorial Avenue, SH1 and Avonhead Road, builds on an established transport framework and can integrate with existing and planned infrastructure (Objectives 6.2.1 and 6.2.4; Policy 6.3.1).
- Urban design and environmental effects: The proposal provides for landscaping, setbacks and screening along Memorial Avenue, while stormwater, earthworks and other environmental effects can be appropriately managed through detailed design and mitigation (Objectives 6.2.1 and 6.2.3).
- Retail and centres: The CRPS seeks to maintain the role and function of the established centres network (Objectives 6.2.5 and 6.2.6). The Economic Assessment (**Attachment 8**) concludes that the Costco warehouse and complementary large format retail activities are unlikely to generate significant retail distribution effects or undermine the role and function of established centres.

6.4.2 Christchurch District Plan

Strategic Direction (Chapter 3)

Objective 3.3.8 provides strategic direction for urban growth, form and development and reflects Objectives 6.2.1, 6.2.2 and 6.2.5 of the Canterbury Regional Policy Statement (refer Section 6.4.1 above). The proposal is consistent with this direction by providing for significant commercial and employment activity within the existing urban area, on land identified and zoned for urban development, with access to existing and planned infrastructure.

Objective 3.3.13 seeks an integrated, safe and efficient transport system. The proposal utilises the established transport framework for the site, including connections to Memorial Avenue and Avonhead Road, and will be supported by detailed transport assessment and infrastructure upgrades at the substantive application stage.

Objective 3.3.15 seeks to manage development in relation to natural hazards. The site is not subject to identified natural hazard overlays under the District Plan, and relevant geotechnical, stormwater and flood matters will continue to inform the detailed design at the substantive application stage.

Aircraft Protection (Chapter 6.7)

A portion of the site at 520 Avonhead Road is located within the Christchurch International Airport Protection Surface. Policy 6.7.2.1.1 seeks to avoid physical obstructions within take-off, approach, landing or departure paths and Runway End Protection Areas. The proposal has responded to this constraint by not providing any buildings or structures within the affected portion of the site.

Policies relating to subdivision, development and earthworks, including Policy 8.2.3.4(vi) and Policy 8.7.4.3(f), require development to manage the risk of bird strike associated with stormwater and ponding, so as not to increase the potential for bird strike to aircraft operating in proximity to the airport. This matter

will be considered through the substantive application to ensure that earthworks and stormwater management do not create areas that are attractive to birds.

Signs (Chapter 6.8)

Some signage may be required within the Memorial Avenue setback. More detail will be provided in the substantive application. Any proposed signage will be assessed against the relevant objectives and policies, including Policy 6.8.2.1.3 and Matter of Discretion 6.8.5.4 Signage adjacent to Memorial Avenue, to ensure that adverse effects on the character and amenity values of the area are appropriately managed.

Transport (Chapter 7)

The proposal is generally consistent with the transport objectives and policies in Chapter 7 of the Christchurch District Plan. In particular, the proposal integrates with an established and previously assessed transport framework, provides access to both the strategic and collector road networks, and is accessible by private vehicles, public transport, walking and cycling. The proposed connection to Avonhead Road will further integrate the site with the surrounding network and provide opportunities to distribute traffic across multiple access points.

The proposal is a high trip generating activity and further assessment of traffic generation and distribution, intersection performance, parking, servicing, active mode connections and road safety will be undertaken as part of the substantive application. However, preliminary assessment indicates that the scale of traffic generation associated with the current proposal is of a similar general order to the substantial full site development scenario previously assessed for the site. The proposal land use mix is different and detailed traffic generation, distribution and network modelling will therefore be undertaken as part of the substantive application. Subdivision, Development and Earthworks (Chapter 8)

The proposal provides an integrated subdivision layout with a coherent movement network and coordinated infrastructure servicing. Stormwater, water, wastewater and other services can be appropriately provided, as confirmed by the Infrastructure Design Report (**Attachment 6**). Earthworks will facilitate development of the site and will be staged and managed through appropriate erosion, sediment and dust controls to manage construction effects.

Designations (Chapter 10)

Designation D1 relates to land designated for Christchurch International Airport Limited for the purposes of Runway End Protection Area (REPA) Area B, to provide for the safe and efficient functioning of Christchurch International Airport. Within the designation, restrictions apply to new buildings and utilities and specified activities, including mass assembly, the release or storage of hazardous substances, the production of direct light beams or reflective glare, radio or electrical interference, and activities that may attract birds. As noted above, the proposal has responded to this constraint by not locating any buildings, structures or specified activities within the affected portion of the site.

Industrial Park Zone (Chapter 16)

Policy 16.2.1.3 identifies the different function of the Industrial Park Zone from the general and heavy industrial zones. The proposal is well suited to the Industrial Park Zone, providing a comprehensively planned, high-amenity development with activities that have substantial land, parking and servicing requirements and generate low levels of noise and odour. Policy 16.2.1.4(b) seeks to avoid sensitive activities in the 50 dB Ldn air noise contour area. This is met in that no sensitive activities are proposed. Policy 16.2.1.4(c) seeks to avoid the use of industrial zones for non-industrial activities that could adversely affect

the role of the centre zones. The Economic Assessment (**Attachment 8**) concludes that the Costco warehouse and complementary large format retail are unlikely to generate significant retail distribution effects or undermine the role and function of the established centres network. Costco's destination-style format and broad regional catchment mean effects will be widely dispersed, while its bulk-buy, membership, wholesale and distribution characteristics differentiate it from conventional centre-based retail. The complementary large format retail will also serve a broad catchment. Policy 16.2.4.1 seeks to maintain the amenity values along Memorial Avenue as a visitor gateway. This requires buildings of high visual and aesthetic quality, limited signage, a large building setback and landscaping along Memorial Avenue. The proposal meets the setback, landscaping, building height and other relevant controls relating to Memorial Avenue.

Memorial Avenue Outline Development Plan (ODP)

Policy 8.2.2.9 seeks that an ODP must demonstrate transport connections are integrated effectively with networks and that connections support coordinated development between different landowners. Appendix 16.8.15 contains the Industrial Park Zone (Memorial Ave) Outline Development Plan. The proposal retains and gives effect to the principal transport structuring elements of the ODP, including the Memorial Avenue access arrangements and connections to adjoining land, while the amended subdivision provides an additional connection through to Avonhead Road. The Transport Assessment (**Attachment 5**) confirms that the proposal retains the established transport framework and does not result in any strategic transport constraints.

6.5 RMA Reforms – Planning Bill transitional provisions

The Planning Bill proposes a new transitional consenting framework that would amend Section 104 of the RMA during the transition to the new planning system. The amendments would require consent authorities, when considering the effects of an activity, to disregard certain effects that are identified as being outside the scope of the new Planning Act. Consistent with Section 14 of the Planning Bill, these include the internal layout of a building, the external layout of a building on a site, where the effects of that layout remain within the boundaries of the site; negative effects of development on trade competition, including effects on competing providers of input goods and services; and retail distribution effects.

These changes are significant for resource consent applications involving retail and commercial development, as retail distribution effects would no longer form part of the effects assessment under the RMA during the transition period. These provisions are likely to be in force by October/November this year.

7.0 Treaty Settlements

Section 7 of the FTAA requires that all persons performing and exercising functions, powers, and duties under the Act must act in a manner that is consistent with the obligations arising under existing treaty settlements, while Section 16 sets out the requirements for the Minister. The Treaty settlement of relevance to the project area is the Ngāi Tahu Claims Settlement Act 1998.

The Ngāi Tahu Claims Settlement Act 1998 gives effect to the settlement of Ngāi Tahu's historical Treaty of Waitangi claims and recognises the cultural relationship of Ngāi Tahu with its rohe and associated ancestral lands, waters, sites, wāhi tapu and taonga.

The project site at 475 Memorial Avenue, 500 and 520 Avonhead Road, and 400 Russley Road, Avonhead, Christchurch does not directly affect any areas identified as being subject to a statutory acknowledgement

or other specific cultural or commercial redress under the Ngāi Tahu Claims Settlement Act 1998 identified in Appendix 1 of the CRPS.

Notwithstanding this, the absence of specific settlement redress does not indicate an absence of cultural association.

Matters relevant to the project may include effects on indigenous vegetation, water quality, historic resources and taonga species. These matters will be considered further through the preparation of the substantive application and associated technical assessments.

Refer to Section 8 below for Section 11 notification details relating to iwi groups.

8.0 Engagement and Consultation, and record of response to Section 11(1)(b) notice

Engagement has been undertaken with administering agencies, iwi and key stakeholders as summarised below. A Section 11(1)(b) notice was provided to the relevant stakeholders on 29 July 2026. A summary of key discussions is below with further details provided in the Engagement and Consultation Record in **Attachment 12**.

Iwi and hapū

Iwi and mana whenua entities identified as having interests in the area were notified of the proposal on 29 July 2026 and invited to engage.

This included Mahaanui Kurataiao Limited, Whitiara Centre Limited, Te Ngāi Tūāhuriri Rūnanga, and Te Rūnanga o Ngāi Tahu. Whitiara Centre Limited acknowledged receipt, and Te Rūnanga o Ngāi Tahu advised that Te Ngāi Tūāhuriri Rūnanga is the mana whenua and primary entity for direct engagement.

Mahaanui Kurataiao responded to the s11 notification advising they will not be providing mana whenua advice on this application as it falls outside of the rohe of Te Taumutu Rūnanga. Canterbury

Whitiara Centre Limited have advised that they are appropriate conduit for FTAA consent inputs, within the Ngāi Tūāhuriri takiwā and further engagement will be undertaken. A summary of the consultation and engagement under s11 for the purposes of this referral application is in **Attachment 12**.

Regional Council (CRC)

CRC was notified of the proposal on 29 July 2026 and subsequently requested a pre-application meeting with the applicant team. The meeting focused on key regional consenting matters, including earthworks, stormwater, dust suppression, contaminated land and the proposed fuel facility. CRC encouraged early and ongoing engagement and the sharing of draft technical reports ahead of substantive lodgement. CRC provided a Section 11 response on 20 August 2026, noting that regional consents may be required for land use (including earthworks and land disturbance), water takes and dewatering, and discharges associated with construction and operational stormwater, sediment, contaminants and air emissions. CRC noted that further project-specific information is required to confirm the applicable consent requirements and whether relevant permitted activity standards can be met. CRC also provided template draft conditions as early guidance for the matters identified and welcomed the opportunity to review the updated rule assessment, technical reports, policy assessment and draft conditions prior to lodgement of the substantive application.

Christchurch City Council (CCC)

Christchurch City Council was notified of the proposal on 29 July 2026 and provided a response under s11 of the FTAA on 25 August 2026. CCC's current position is neutral, noting the limited information available at the referral stage, but indicated that it is likely to be able to support the concept if the identified matters can be appropriately addressed.

CCC identified key matters for further assessment as including retail distribution effects and consistency with the Industrial Park Zone and centres framework; transport and wider network effects; three waters servicing and infrastructure upgrades; stormwater management; urban design and the high-amenity Memorial Avenue gateway; and integration with the Outline Development Plan.

CCC also noted that the substantive application should address noise, earthworks, geotechnical and natural hazard matters, natural heritage and biodiversity, effects on strategic infrastructure, and clearly demonstrate the significant national or regional benefits of locating the Costco Christchurch Project on the site

Department of Conservation (DOC)

DOC was notified of the application on 29 July 2026, with further information provided following initial correspondence. A formal response was received on 17 August 2026. DOC did not identify any matters preventing the project from progressing at this stage but seeks further information on protected species, indigenous flora and freshwater features to inform any Wildlife Act or freshwater approvals required. DOC recommends ongoing pre-lodgement engagement, including review of ecological reports, management plans and draft conditions.

9.0 Conclusion

The Costco Christchurch Project represents a significant regional investment that will establish Costco's first South Island warehouse together with a members' fuel facility, approximately 7,900m² of complementary large format retail and associated transport, servicing and infrastructure.

The Project will deliver significant economic and employment benefits, increase grocery competition and consumer choice, provide opportunities for local businesses and suppliers, and enable the productive use of a strategically located and currently underutilised urban site. The complementary large format retail will support the functionality, customer draw and resilience of the integrated Costco destination and, in turn, the successful establishment and enduring competitiveness of Costco's first South Island warehouse.

The supporting technical assessments also confirm that transport, servicing, geotechnical, natural hazard and other environmental effects can be appropriately managed through detailed design, mitigation and conditions.

Use of the Fast-track process will support the timely delivery of the Costco Christchurch Project and enable its regional economic and consumer benefits to be realised sooner. For these reasons, the Costco Christchurch Project is considered suitable for referral and assessment through the fast-track consenting process.