



FTAA-2608-1281: Application received for referral of the project under the Fast-track Approvals Act 2024 – Stage 1 decisions

Project Name: Costco Christchurch

Date submitted	11 September 2026	Tracking	26-BRF-02636
Security level	In-Confidence	Priority	Urgent

To	Action sought	Response by
Hon Chris Bishop Minister for Infrastructure	Decisions on recommendations in Table A	18 September 2026

Actions for Minister's Office staff	Return the signed briefing to: FTAreferrals@mfe.govt.nz Send email to Ministers to invite written comments
Number of appendices: 3	Appendices: 1. Statutory framework summary 2. Application documents for Costco Christchurch project 3. List of the Māori groups referred to in section 18(2)

Ministry contacts

Name	Position	Telephone	1 st contact
Oliver Sangster	Principal Author		
Stephanie Frame	Manager	s 9(2)(a)	✓
Ilana Miller	General Manager	s 9(2)(a)	



Project area



Figure 1: Costco Christchurch project proposed site plan and location. Specific building locations within the site are indicative only.

Key messages

1. This briefing seeks your initial decisions on an application from Costco Wholesale New Zealand Limited and Miles Premises Limited (the applicants) to refer the Costco Christchurch project (the project) under the Fast-track Approvals Act 2024 (the Act) to the fast-track approvals process.
2. At this stage you can either decline an application for the reasons set out section 21, or provide the application to, and invite comments from, the parties identified in section 17. If you do not decline the application, you will receive a further briefing following receipt of comments, to inform your final decision on whether to refer the project.



3. The project is to Develop Costco's first South Island wholesale warehouse, on a 17.68-hectare site in Avonhead, Christchurch in the Canterbury Region. The project comprises the following:
 - a. 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
 - b. Establishment of a members' fuel facility, including an associated data hut, signage and vehicle manoeuvring areas to service both cars and trucks
 - c. Establishment of approximately 7,900m² of complementary large format retail activities, together with associated signage and parking
 - d. 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
 - e. Enabling works, including site preparation, earthworks and the installation of supporting roading infrastructure and services including required upgrades.
4. The site is subject to an existing subdivision consent, which is held by the Miles Premises Limited, that would require modification to accommodate the project's proposed revised layout.
5. The project will require resource consents, and change or cancellation of existing resource consent conditions, under the Resource Management Act 1991. The project also seeks approval under the Wildlife Act 1953, which (if referred) would be confirmed ahead of a substantive application being lodged.
6. The overall project site intersects with designations held by Christchurch International Airport Limited (runway protection and noise contours) and is adjacent to State Highway 1. The site also includes specific building height restrictions under a Gazette notice from 1953, in respect to airport operations. The project design appears to be accounting for these aspects.
7. We have undertaken initial analysis of the referral application, and this is presented along with our considerations and recommendations in Table A.
8. We have decided the application is complete and complies with section 14 of the Act, as the application complies with section 13 requirements, may be capable of satisfying the criteria in section 22 and does not appear to involve an ineligible activity. The applicable fee and levy have been paid.
9. We recommend you progress consideration of the referral application to the next stage of analysis (Stage 2) and invite written comments from the parties prescribed in section 17(1) of the Act being:
 - a. Canterbury Regional Council and Christchurch City Council as the relevant local authorities
 - b. the Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development
 - c. the Minister of Conservation and the Minister of Commerce and Consumer Affairs as the other relevant portfolio Ministers
 - d. Department of Conservation as the relevant administering agency
 - e. the parties in Appendix 3 as the other identified Māori groups.



10. We recommend that you also invite written comments from the following as additional persons under section 17(5) of the Act:
- a. The Minister for Economic Growth
 - b. The Minister for Regional Development
 - c. The Grocery Commissioner,
 - d. The Chief Executive of NZ Transport Agency Waka Kotahi
 - e. The Chief Executive of Christchurch International Airport Limited.

Action sought

11. Please indicate your decisions on the recommendations in Table A.

Signature

Stephanie Frame
Manager – Fast-track Operations

Table A: Stage 1 analysis

Project details	Project Name		Applicants		Project Area	
	Costco Christchurch (the project)		Costco Wholesale New Zealand Limited Miles Premises Limited		Four land parcels in Avonhead, Christchurch, with a combined area of approximately 17.68 ha: - 475 Memorial Avenue Lot 2 DP 553686 - 500 Avonhead Road (Lot 1 DP 553686) - 520 Avonhead Road (Lot 5 DP 28780) - 400 Russley Road (Sec 8 SO 544350) The site is bounded by Memorial Avenue to the north, Avonhead Road to the south, and Russley Road (State Highway 1) to the west.	
Project description	The project is to Develop Costco’s first South Island wholesale warehouse, on a 17.68 hectare site in Avonhead, Christchurch in the Canterbury Region. The project comprises the following: a. 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 b. Establishment of a members’ fuel facility, including an associated data hut, signage and vehicle manoeuvring areas to service both cars and trucks c. Establishment of approximately 7,900m² of complementary large format retail activities, together with associated signage and parking d. 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 e. Enabling works, including site preparation, earthworks and the installation of supporting roading infrastructure and services including required upgrades. The applicant is seeking the following approvals through the fast-track approvals process: a. resource consents, and change or cancellation of existing resource consent conditions, under the Resource Management Act 1991 b. approval under the Wildlife Act 1953.					
Notification and/or consultation undertaken	As required by section 11, the applicant has:					
	Notified in writing, the relevant local authorities	Notified in writing, the relevant iwi authorities, hapū and Treaty settlement entities	Consulted, the relevant MACA groups	Consulted, ngā hapū o Ngāti Porou	Notified in writing, the relevant administering agencies	Notified in writing, the holder of land to be exchanged
	Canterbury Regional Council Christchurch City Council	Mahaanui Kurataiao Limited Whitiora Centre Limited Te Ngāi Tūāhuriri Rūnanga Te Runanga o Ngai Tahu	N/A	N/A	Department of Conservation	N/A
Section 22 assessment criteria						
The project is an infrastructure or development project that would have significant regional or national benefits [section 22(1)(a)]	<i>The Minister <u>must</u> consider a relevant Government policy statement (GPS) [s22(1A)]</i> You must consider the Government Policy Statement for Grocery Competition’s (GPS-GC’s) objectives and characteristics when determining whether this project, as a grocery project, meets the threshold for regional or national significance. Based on the applicant’s assessment, this project is likely to align with points 1, 2 and 4 of the GPS-GC (as summarised below). This could be informed further by comments, for example from the Minister of Commerce and Consumer Affairs, Minister of Economic Growth and Grocery Commissioner, should you proceed to the next stage. 1. Reduce market concentration: Costco is not a new participant in New Zealand overall, but this project would be its first store in the South Island. The applicant is therefore a new entrant to the South Island market and not connected to dominant grocery chains operating in this area. 2. Enable scalable competition: the scale of this grocery retail project means this is likely to be capable of competing with existing chains at a regional level. Costco’s expansion into the South Island would likely assist with its scaling to compete more effectively at the national level. 3. Support multi-site or regional expansion: as a single site, this project does not involve multiple builds across regions or within a region. 4. Provide footholds for new competitors: as a one-off development, this particular project would help Costco grow and compete more effectively in the South Island. You <u>may</u> consider any of the following matters, or any other matters the Minister considers relevant: <i>Will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020) [s22(2)(a)(iii)]</i> The applicant considers the project 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. The applicant considers the project will be also support other objectives and policies of the NPS-UD. <i>Will deliver sianificant economic benefits [s22(2)(a)(iv)]</i>					

	The applicant attached an economic report by Insight Economics Limited, which estimates the following economic benefits: 1. Construction: total project investment estimated 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 2. Operational: approximately 400 direct 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. <i>Will support climate change mitigation, including the reduction or removal of greenhouse gas emissions [s22(2)(a)(vii)]</i> The applicant notes the project 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. The applicant notes the site's location within the existing Christchurch urban environment, adjacent to State Highway 1 and accessible by different transport modes (e.g. existing bus line on Memorial Avenue), pedestrian and cycle access, while acknowledging private vehicle use will remain important for Costco's bulk buy model. The project presents opportunities to incorporate efficiency in design/construction. <i>Will promote competition in the grocery industry [s22(2)(a)(ixa)]</i> The application, including the report from Insight Economics Limited, suggests the project would "materially improve grocery competition and consumer welfare, by introducing an underrepresented wholesale club format to the South Island for the first time, as part of a credible multi-region expansion by a new entrant unconnected to the incumbent chains, with additional fuel price competition benefits, in direct alignment with the GPS on Grocery Competition". <i>Is consistent with local or regional planning documents, including spatial strategies [s22(2)(a)(x)]</i> The applicant considers the project generally aligns with the high level strategic direction of the Christchurch District Plan and Canterbury Regional Policy Statement. The site is subject to the Industrial Park Zone (Memorial Ave) Outline Development Plan, and the applicant suggests the project retains and gives effect to its principal transport structure elements. The project interfaces with particular designations held by New Zealand Transport Agency Waka Kotahi and Christchurch International Airport Limited, and inviting comment from those parties (in addition to the relevant local authorities) will help with further assessment on this point.		
Referring the project to the fast-track approvals process [section 22(1)(b)]	<i>Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes [s22(1)(b)(i)]</i> The applicant notes the ability to apply for a comprehensive range of consenting requirements within one application (including potentially Wildlife Act approval), to be considered by one panel, offers significant efficiencies in planning and specialist expertise. The applicant further notes the possibility that resource consent application(s) could be notified under the standard process, result in a longer and more costly process (taking into account appeal rights under the RMA), compared with FTAA. <i>Is unlikely to materially affect the efficient operation of the fast-track approvals process [s22(1)(b)(ii)]</i> The applicant states it has resourcing in place to process the application efficiently, and that the project can be lodged as a complete, well-scoped application with the necessary technical inputs to support efficient expert panel consideration.		
Minister invites comments	<i>You must copy the application to, and invite written comments from [s17(1)]:</i> a. Relevant local authorities: – Canterbury Regional Council – Christchurch City Council b. The Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development c. Other relevant portfolio Ministers: – The Minister of Conservation – The Minister of Commerce and Consumer Affairs d. Relevant administering agency: – Department of Conservation e. The Māori groups identified in Appendix 3	<i>You may copy the application to, and invite written comments from, any other person [s17(5)]:</i> We recommend you invite comments from the following additional persons, for the specified reasons: a. The Minister for Regional Development b. The Minister for Economic Growth c. The Grocery Commissioner (which is a statutory role under section 167 Grocery Industry Competition Act 2023), given the project's potential to promote grocery competition d. The Chief Executive of NZ Transport Agency Waka Kotahi, given the site's location in proximity to State Highway 1 and its associated designation e. The Chief Executive of Christchurch International Airport Limited, as part of the site includes the airport runway end protection area designation	<i>The Minister may request further information about a referral application from the applicant, the relevant local authorities, or the relevant administering agencies to be provided within the time frame specified in the request.</i> We have not identified any specific further information to be requested
Recommendations			Minister's decision
a. Note that section 25 of the Act permits you to decline the referral application without inviting comments from the parties under section 17.			Noted
b. Note that you have not yet provided the application to, nor sought any written comments on it from, the parties listed in section 17(1) but that you are required to do so if you do not decline the application under section 21 of the Act.			Noted

c. Note that section 17(5) of the Act permits you to forward an application to, and invite written comments from, any other person.	Noted
d. Note that if comments have been sought and provided within the required time frame you are required to consider it, along with the referral application, before deciding to decline the application.	Noted
e. Note that section 20 of the Act permits you to request further information from the applicant or relevant local authorities or relevant administering agencies at any time before you decide whether to accept or decline an application.	Noted
f. Agree to progress the Costco Christchurch project to our Stage 2 analysis (invite written comments and request section 18 Treaty report).	Yes / No
g. Agree to provide the application to, and invite written comments from: i. Canterbury Regional Council and Christchurch City Council as the relevant local authorities under section 17(1)(a) ii. the Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development under section 17(1)(b) iii. the Minister of Conservation and the Minister of Commerce and Consumer Affairs as the other relevant portfolio Ministers under section 17(1)(b) iv. Department of Conservation as the relevant administering agency under section 17(1)(c) v. the parties in Appendix 3 as the identified Māori groups under section 17(1)(d) vi. any parties you are required to invite comments from under section 17(1)(d) and (e) who may be subsequently identified	Yes / No Yes / No Yes / No Yes / No Yes / No Yes / No
h. Agree to provide the application to and invite written comments from the following additional persons under section 17(5): i. Minister for Regional Development ii. Minister for Economic Growth iii. The Grocery Commissioner iv. The Chief Executive of NZ Transport Agency Waka Kotahi v. The Chief Executive of Christchurch International Airport Limited	Yes / No Yes / No Yes / No Yes / No Yes / No
i. Note that you have agreed to delegate to the Secretary for the Environment your responsibility to send all correspondence, other than to Ministers.	Noted
j. Agree to send the email to invite written comments from Ministers.	Yes / No

Signed:

Hon Chris Bishop
Minister for Infrastructure

Date:

Appendix 1: Statutory framework summary

1. You are the sole decision maker for referral applications. If you accept a referral application, then the whole or part of the project will be referred to the fast-track approvals process.
2. If a Treaty settlement, the Marine and Coastal Area (Takutai Moana) Act 2011, the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, a Mana Whakahono ā Rohe or a joint management agreement provides for consideration of any document or procedural requirements, you must, where relevant:
 - a. give the document the same or equivalent effect through this process as it would have under any specified Act; and
 - b. comply with any applicable procedural requirements.
3. You must decline a referral application if:
 - a. you are satisfied the project does not meet the referral criteria in s22
 - b. you are satisfied the project involves an ineligible activity (s5)
 - c. you consider you do not have adequate information to inform your decision.
4. You may decline an application for any other reason, including those set out in s21(5) and even if the application meets the s22 referral criteria.
5. You can decline an application before or after inviting comments under s17(1). However, if comments have been sought and provided within the required time frame, you must consider them, along with the referral application, before deciding to decline the application.
6. If you do not decline a referral application at this initial stage you must copy the application to, and invite written comments from:
 - a. the relevant local authorities
 - b. the Minister for the Environment, the Minister for Māori Crown Relations: Te Arawhiti, and the Minister for Māori Development
 - c. any other relevant portfolio Ministers
 - d. the relevant administering agencies
 - e. the Māori groups identified by the responsible agency
 - f. the owners of Māori land in the project area (if applicable)
 - g. you may provide the application to and invite comments from any other person.
7. You can request further information from an applicant, any relevant local authority or any relevant administering agency at any time before you decide to decline or accept a referral application (see section 20 of the Act).
8. However, if further information has been sought and provided within the required time frame you must consider it, along with the referral application, before deciding to decline the application.

Appendix 2: Application documents for Costco Christchurch project

Appendix 3: List of the Māori groups referred to in section 18(2)

Name of group	Type of group (section of Act)
Te Rūnanga o Ngāi Tahu	Iwi authority (s18(2)(a)), Treaty settlement entity (s18(2)(a) – Ngāi Tahu Claims Settlement Act 1998)
Te Ngāi Tūāhuriri Rūnanga	Iwi authority (s18(2)(a)), Treaty settlement entity (s18(2)(a) – Ngāi Tahu Claims Settlement Act 1998)
Whitiora Centre Limited	Other Māori group with relevant interests (s18(2)(k))