

Hon Cameron Brewer

Minister of Commerce and Consumer Affairs
Minister for Small Business and Manufacturing
Associate Minister of Immigration



Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington
REQ-0039720

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on the referral applications for Costco Christchurch (FTAA-2608-1281).

I am providing these comments in my capacity as Minister of Commerce and Consumer Affairs. They focus on whether the application is likely to promote competition in the grocery industry under section 22(2)(a)(ixa) of the Act, based on the information provided by the applicants.

Costco Christchurch, FTAA-2608-1281

The application proposes Costco's first South Island wholesale warehouse on approximately 17.68 hectares in Avonhead, Christchurch, close to the Airport and State Highway 1. The proposed development would include a 16,090 square metre Costco warehouse, a members' fuel facility and approximately 7,900 square metres of complementary large-format retail.

Costco's proposed store is expected to promote grocery competition across the Canterbury region and South Island as a whole. Costco's entry aligns well with the Government Policy Statement on Grocery Competition. It should challenge the status quo by reducing the market concentration of the incumbent retailers, and by introducing a membership-based club format which is currently underrepresented in the South Island market. While the proposed development is a single, one-off warehouse, it is of sufficient scale to promote competition in the relevant markets, benefiting consumers in the long term.

The proposal appears likely to promote competition in the grocery industry under section 22(2)(a)(ixa) of the Act by introducing a large-scale wholesale-club format to the South Island and providing greater choice for consumers.

Yours sincerely

A blue ink signature of Hon Cameron Brewer, consisting of a stylized 'C' followed by a series of loops and a final 'n'.

Hon Cameron Brewer
Minister of Commerce and Consumer Affairs

Hon James Meager

Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport



23 SEP 2026

JMITC-68

Hon Tama Potaka
Acting Minister for Infrastructure

By email: infrastructure.portfolio@parliament.govt.nz

Tēnā koe Minister Potaka,

Invitation to comment on the Costco Christchurch project under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on the Costco Christchurch project under section 17 of the Fast-track Approvals Act 2024.

I have considered the application and its alignment with my portfolios as Acting Minister for Māori Crown Relations: Te Arawhiti and Acting Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report.

Nāku noa, nā

Hon James Meager

Acting Minister for Māori Crown Relations: Te Arawhiti
Acting Minister for Māori Development



6 October 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ- 0039720

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on the referral applications for Costco Christchurch (FTAA-2608-1281), s 9(2)(a) [REDACTED]

I am providing these comments in my capacity as Minister for Economic Growth. They focus on whether each application is likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act. For Costco Christchurch, I have also considered whether the application is likely to promote competition in the grocery industry under section 22(2)(a)(ixa). My comments are based on information provided by the applicants, and the quantitative estimates are drawn from their economic assessments.

Costco Christchurch, FTAA-2608-1281

The application proposes Costco's first South Island wholesale warehouse on approximately 17.68 hectares in Avonhead, Christchurch. The proposed development would include a 16,090 square metre Costco warehouse, a members' fuel facility, and approximately 7,900 square metres of complementary large-format retail.

According to the applicant's economic assessment, the project would involve approximately \$89.6 million in development expenditure. Construction is estimated to directly contribute \$21 million to Canterbury GDP and support 110 FTEs over the construction period. Once operational, the project is estimated to directly support 400 FTEs and contribute \$37.8 million to GDP annually.

Costco's proposed store is expected to promote grocery competition across the Canterbury region and South Island as a whole. Costco's entry aligns well with the Government Policy Statement on Grocery Competition. It will likely challenge the status quo by reducing the market concentration of the incumbent retailers, and by introducing a membership-based club format which is currently underrepresented in the South Island market. While the proposed development is a single, one-off warehouse, it is of sufficient scale to promote competition in the relevant markets, benefiting consumers in the long term.

On balance, the proposal appears likely to deliver significant economic and grocery competition benefits under sections 22(2)(a)(iv) and 22(2)(ixa) of the Act through construction investment, ongoing employment and economic activity, and increased grocery competition.

s 9(2)(a)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

s 9(2)(a)

[Redacted text block containing multiple lines of information]

Yours sincerely



Hon Nicola Willis
Minister for Economic Growth

YOUR COMMENT ON THE COSTCO CHRISTCHURCH PROJECT.

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Canterbury Regional Council		
First name	Victoria		
Last name	Kingsbury		
Postal address	200 Tuam Street, Christchurch Central, Christchurch		
Home phone / Mobile phone		Work phone	s 9(2)(a)
Email (a valid email address enables us to communicate efficiently with you)	fasttrack@ecan.govt.nz		

2.			
☐	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

Thank you for your comments

6 October 2026

Stephanie Frame
Manager – Fast-track Operations
Fast-track Applications
Environmental Protection Authority
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Kia ora Stephanie,

Thank you for your letter received 16 September 2026 regarding the Costco Christchurch Project from Costco Wholesale New Zealand Limited and Miles Premises Limited.

Please find attached the response from Canterbury Regional Council (CRC) to the specific questions raised in the above letter. Also included within the response are general comments on the proposal which may assist the Minister in making their determination under section 21 of the Fast Track Approvals Act 2024 (FTAA).

Overall, CRC do support the referral of this proposal because it does meet the following criteria in section 22 2 (ixa) as the proposal will promote competition in the grocery market and there are no reasons to decline the proposal under section 21.

CRC trusts that these comments will assist the Minister in determining whether to accept the referral application and proceed with referring the project. Should any further information be required, please do not hesitate to contact us.

Ngā mihi

A handwritten signature in black ink, appearing to read "Victoria Kingsbury", with a stylized flourish at the end.

Victoria Kingsbury
Principal Consents Planner

CANTERBURY REGIONAL COUNCIL COMMENTS UNDER S17 FTAA – COSTCO CHRISTCHURCH PROJECT

Specific questions from the EPA

Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please also confirm this in writing.

CRC does not hold a record of any competing applications (per the definition in the Fast-track Approval Act 2024 (FTAA)) in the same project area.

The applicant has proposed a groundwater take for dust suppression during the construction phase of the project as a permitted activity under Rule 5.113. The applicant considers that if the water take exceeds 5 Litres a second and 10m³ per day, then the proposed take would fall to a Restricted Discretionary Activity under Rule 5.128 or a Non-Complying Activity under Rule 5.129.

The applicant has also proposed to dewater groundwater as a permitted activity under Rule 5.119. As the site is listed as a contaminated site, the proposed dewatering is considered a restricted discretionary activity under Rule 5.120.

The site is within the Christchurch West-Melton Groundwater Allocation Zone and there is no numerical allocation limit for groundwater in this zone. Rather, as per the CLWRP Allocation Limit (9.6.2) for the zone:

In general, no additional water is to be allocated from the Christchurch West-Melton Groundwater Allocation Zone shown on the Planning Maps except for group or community water supply as set out in Rule 5.115 or for non-consumptive taking and use as set out in Rules 5.131 and 5.132.

However, as water is proposed to be taken under Rule 5.113 for dust suppression as a permitted activity, and under either Rule 5.119 or 5.120 for dewatering, none of which allocate groundwater, the application would not result in additional water being allocated from the Christchurch West-Melton Groundwater Allocation Zone.

As there is no numerical allocation limit, any application for a new groundwater water take resulting in allocation (except for those provided for under Rules 5.115, 5.131 and 5.132) would be a prohibited activity regardless of the current application. Similarly, if this application were granted allocation, that would not prevent future applications from being allocated groundwater under Rules 5.115, 5.131 or 5.132.

CRC advises that if the proposed groundwater take exceeds the limits set out in Rule 5.113 that the proposed take would be considered a prohibited activity under Rule 5.130 due to the allocation status of the groundwater zone.

In relation to projects seeking approval of a resource consent under section 42(4)(a) of the FTAA, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please also confirm this in writing.

CRC can confirm that no such applications exist.

Miles Premises Limited hold the following issued resource consents that are applicable to the general site:

1. RMA/2022/1968, RMA/2022/1411 -Consents sought from the District Council to establish the existing subdivision framework for the site, with amendments proposed to facilitate the Christchurch

Costco Project. The consents also enable the use of land for an automotive showroom, workshop and office by Miles Automotive. The applicant advises that these consents are currently on hold. The proposed development is located on Lots 1 and 2 and does not overlap with the Christchurch Costco Project site.

2. CRC224947 - Authorises the discharge of construction phase stormwater to land over the wider site. Consent was issued on 14 Nov 2022 and has not been exercised. The applicant has proposed that this consent could be amended or replaced to accommodate the updated development and associated works.

It is CRC's view that the amendments required would likely be out of scope for a change of conditions under s127 of the RMA and would therefore need to be replaced.

Whether the project would have significant regional or national benefits (refer to section 22 of the FTAA for the criteria for assessing referral applications). Additionally, and in this context, provide any high-level commentary regarding the project's alignment with the Council's relevant plans, policies, and/or strategies (including any proposed plans).

Canterbury Regional Policy Statement

The Canterbury Regional Policy Statement (CRPS) gives an overview of the significant resource management issues facing the region, including issues of resource management significance to Ngāi Tahu. The purpose of the CRPS is to set out objectives, policies and methods to resolve those resource management issues and to achieve the integrated management of the natural and physical resources of Canterbury.

The CRPS seeks to ensure development, including the associated use and provision of infrastructure and services, appropriately manages adverse effects on the environment in order to enable people and communities to provide for their social, economic and cultural well-being.

Development can either enable or adversely affect the ability of people and communities to provide for their social, economic and cultural well-being, and health and safety. Once development is established it is likely to exist for a number of generations. Changing the form and structure of established urban, rural-residential and rural areas can be difficult and expensive. Therefore, the CRPS seeks to achieve a robust form of development that is responsive in the long term to changing needs of people and communities

Land-use and infrastructure require coordination and integration in order to ensure potentially significant benefits to people and the community are achieved and that the adverse effects on the environment are appropriately avoided, remedied, or mitigated and/or controlled.

Overall, the proposal appears to be broadly consistent with the CRPS, subject to adverse effects on the environment being appropriately avoided, remedied, or mitigated and/or controlled. However, CRC anticipates that the applicant would provide a comprehensive assessment of adverse effects as well as suitable Management Plans addressing adverse effects within a substantive application (if referred).

If the substantive application can appropriately address adverse effects, the proposal would likely be consistent with the CRPS. However, a detailed assessment against the relevant objectives and policies of the CRPS should be provided as part of the substantive application. Until that assessment is provided, CRC cannot confirm whether the proposal is fully consistent with the CRPS, particularly in relation to urban development, infrastructure sequencing, natural hazards, and loss of productive land.

CRC notes that the CRPS generally reflects the RMA terminology of avoiding, remedying or mitigating adverse effects. The FTAA also provides for offsetting and compensation as potential measures to address adverse effects where appropriate.

See Appendix 1 for a high-level planning assessment provided by the CRC Planning team.

Canterbury Land and Water Regional Plan

The CLWRP sets out objectives and policies that identify the importance of high-quality freshwater for social, cultural and economic wellbeing, and that recognise the connectivity between land-use and the various sources of freshwater. The CLWRP also recognises that land-use and development will occur but can have adverse effects on the quality of freshwater, if not appropriately managed. Consequently, the CLWRP seeks that land-use and development occur in a manner that avoids, remedies or mitigates adverse effects on the biophysical and cultural values, including Ngāi Tahu values, of freshwater in Canterbury.

CRC anticipate that the applicant would provide within the application a fulsome assessment of adverse effects as well as comprehensive Management Plans addressing adverse effects of groundwater take, earthworks, disturbance of contaminated land, and stormwater during the construction and operational phase, in accordance with best practice.

The Applicant has stated that operational stormwater from vested roads is to be discharged under the Christchurch City Council's global consent and that wastewater from the proposed development would be connected to reticulated Council infrastructure. CRC anticipate that a suitable civil engineering details would be included within the application. If a substantive application contains the appropriate assessment, including the relevant specialist assessments and Management Plans, the proposal would likely be consistent with the CLWRP.

The applicant has identified consents that may be required but has not identified what consents they actually require or would seek consent for, if referred. There is insufficient information in the application for CRC to determine the relevant rule considerations at this stage. CRC notes that a detailed application and rule assessment will need to be provided before CRC can provide an equally detailed assessment.

GENERAL COMMENTS FROM CRC TO ASSIST WITH CONSIDERATION AGAINST S21 AND S22 FTAA

Criteria under Section 21	CRC Comment
3) The Minister must decline a referral application if— (a) the application may not be accepted under subsection (1) ¹ ; or	N/A
(b) the Minister is satisfied that the project involves an ineligible activity; or	The application states that the project does not involve any ineligible activities. CRC agree and are not aware of the activity involving any ineligible activities as defined in Section 5 of the Act.
(c) the Minister considers that they do not have adequate information to inform the decision under this section.	While further information would be required to support a substantive decision, CRC considers that sufficient information has been provided to inform the Minister's decision on referral.
(4) The Minister may decline a referral application for any other reason, whether or not the project meets the criteria in section 22 .	This is a matter for the Minister to determine.
(5) Reasons to decline a referral application under subsection (4) include, without limitation, the following: (a) the project would be inconsistent with any of the following: (i) a Treaty settlement; (ii) the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 ; (iii) the Marine and Coastal Area (Takutai Moana) Act 2011 ; (iv) a Mana Whakahono ā Rohe; (v) a joint management agreement:	CRC considers other parties invited to comment on the referral application are the appropriate parties to advise the Minister on these matters.
(b) it would be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts:	The consents sought from the CRC appear to be of low complexity and in all likelihood would be able to be progressed under the RMA. However, CRC understands that other elements of the proposal not related to CRC are likely the reason for pursuing the FTAA pathway. As such, CRC is not currently aware at this point of time of any reasons why the matters to be authorised by the proposed approvals would be more appropriate to deal with under another Act.
(c) the project may have significant adverse effects on the environment:	The application states that stormwater, earthworks and other environmental effects can be appropriately managed through detailed design, site controls and mitigation.

¹S21(1) refers to staged and alternative projects [Fast-track Approvals Act 2024 | New Zealand Legislation](#)

	The referral application contains insufficient detail to determine if the project would have significant effects on the environment. However, based on the information available at present, it is unlikely that the project may have significant adverse effects on the environment. This view is preliminary and would need to be confirmed through the substantive application process, including through a full assessment of effects and technical review.
(d) the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) has a poor compliance history under a specified Act that relates to any of the proposed approvals:	CRC is not aware of any recent significant compliance issues in relation to the Applicants
(e) the project area includes land that the Minister for Treaty of Waitangi Negotiations considers necessary for Treaty settlement purposes:	To CRC's knowledge, this criterion does not apply to the project area
(f) the project includes an activity that is a prohibited activity under the Resource Management Act 1991 ² :	The Applicant is not seeking approval for a prohibited activity under the RMA. CRC notes that this may change depending on the applicants' proposed methodology for abstracting water for dust suppression, in which case the applicant should consider how section 30 may apply.
(g) a substantive application for the project would have 1 or more competing applications:	CRC does not hold a record of any competing applications (per the definition in the FTAA) in the same project area.
(h) in relation to any proposed approval of the kind described in section 42(4)(a) (resource consent), there are 1 or more existing resource consents of the kind referred to in section 30(3)(a) .	CRC notes that there have been resource consents granted to enable construction phase works and subdivision of the site. The applicant has noted in the referral application that these may be varied or replaced either by this process or under the RMA to reflect the current proposal. Notwithstanding the above, CRC considers there are no existing consents of the kind specified in section 30(3)(b) of the FTAA.

CRITERIA FOR ASSESSING REFERRAL APPLICATION – SECTION 22(1-2)

Criteria under Section 22	CRC Comment
(1) The criteria for accepting a referral application are that— (a) the project is an infrastructure or development project that would have significant regional or national benefits; and	The application states that the project will deliver significant economic and community benefits at the regional level. CRC do not disagree with this assessment and therefore have not had this assessment peer reviewed by an independent auditor.

²S21(7) states that a prohibited activity does not necessarily prevent referral [Fast-track Approvals Act 2024 | New Zealand Legislation](#)

(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	This application requires approvals from multiple authorities and agencies, and the FTAA is therefore likely to facilitate more timely and cost-effective processing. The proposal is unlikely to materially affect the efficient operation of the fast-track approvals process.
(1A) For the purposes of subsection (1)(a), the Minister must consider a relevant Government policy statement.	CRC considers that the Government Policy on Grocery Competition is relevant to the application.
(2) For the purposes of subsection (1)(a), the Minister may consider— (a) whether the project— (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:	The project has not been identified as a priority project.
(ii) will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure:	The project does not meet this criterion as it does not comply with the specific definitions for regionally or nationally significant infrastructure provided in the Canterbury Regional Policy Statement and the National Policy Statement on Urban Development.
(iii) 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):	CRC considers the proposal is consistent with Policy 1 (c) in providing grocery and health services to the local community.
(iv) will deliver significant economic benefits:	The applicant has provided an economic assessment in Attachment 8 of the application. In summary, the applicant considers the proposal will bring the following benefits at each stage: Construction phase - Approximately 350 FTE-years of employment. - Approximately \$31 million in wages and salaries. - Approximately \$63 million in regional GDP. - Assumes 90% of the benefits accrue to the Canterbury region. Operational phase

	a. Approximately 250 direct FTEs employed at the Costco warehouse. b. A further 150 FTEs estimated across the balance of the retail component. c. No allowance made for employment associated with the largely automated fuel facility. d. Including supply-chain effects, the site is estimated to support approximately: 486 FTEs in total employment. \$32 million in wages and salaries per annum. \$57 million in GDP per annum. CRC has not received technical advice on the assessment but does not dispute the findings of the assessment.
(v) will support primary industries, including aquaculture:	This section is not applicable to this proposal.
(vi) will support development of natural resources, including minerals and petroleum:	This section is not applicable to this proposal.
(vii) will support climate change mitigation, including the reduction or removal of greenhouse gas emissions:	At Sections 3 and 3.1 of the planning memorandum, the applicant states the proposal will have opportunities to support climate change mitigation through energy-efficient design, lower-emission technologies and transport initiatives. CRC does not necessarily dispute these statements but considers that they do not relate to the primary purpose of the proposal and, accordingly, that this criterion has limited relevance to the proposal.
(viii) will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards:	This section is not applicable to this proposal.
(ix) will address significant environmental issues:	This section is not applicable to this proposal.
(ixa) will promote competition in the grocery industry:	The applicant considers that the proposal fully aligns with objectives of the GPS for grocery competition and will: • reduce market concentration, • enable scalable competition, • support regional or multi-site expansion, and • provide footholds for new competitors. CRC considers the proposal is consistent with the objectives of the GPS.
(x) is consistent with local or regional planning documents, including spatial strategies:	CRC considers that proposal will likely give effect to overarching intent of the CRPS. See Appendix 1 for a further assessment.
(b) any other matters the Minister considers relevant.	This is a matter for the Minister to determine.

Appendix 1 – Planning Advice from CRC Planning Team.

Canterbury Regional Policy Statement 2013

The proposed site is located within a Greenfield Priority Area for Business in Map A of the Canterbury Regional Policy Statement (CRPS), thus this proposal will give effect to the overarching intent of the CRPS by developing land identified for urban business purposes.

The consultant's assessment against the CRPS³ is considered appropriate and I agree that the proposal gives effect to the identified objectives and policies of the CRPS. Although the consultant's assessment does not address all the relevant objectives and policies of the CRPS, considering the provided assessment and the proposal as a whole, it is anticipated the proposal will likely be generally consistent with the CRPS. Nonetheless, a full assessment against the relevant provisions of the CRPS should be provided. It is acknowledged that policy 6.3.5 is relevant to this proposal as it is located within the airport noise contour, however given that the proposed building is not classified as a noise sensitive activity, this provision is not applicable.

The proposal will provide for efficient use of existing transport infrastructure by being located near Memorial Avenue, State Highway 1 and public transport stops, which in turn promotes the efficient use of energy by planning for efficient transportation, including freight as directed by Objective 16.2.1. It is also noted that the proposal is located and designed in a way which maintains an urban form that shortens trip distances due to surrounding residential and commercial spaces which will form part of the customer base, as well as offering transport options for employees.

National Policy Statement for Urban Development 2020

The National Policy Statement for Urban Development (NPS-UD) seeks to provide for well-functioning urban environments that enable all people and communities to provide for their social, economic and cultural well-being, and for their health and safety, now and into the future.

This proposal will achieve the purpose of the NPS-UD by enabling the construction of a Costco which will contribute to a well-functioning urban environment through the provision of a business activity in an area that is well connected to surrounding residential and commercial sites and a range of transport options. Further to this, the development provides for an in-sequence development opportunity by having available infrastructure ready for connection to the site, alongside transport options.

Considering the consultants assessment⁴ alongside the summary above, the intent of the NPS-UD is anticipated to be met via this proposal.

³ Planning Memorandum (file reference C26C/194891-4), Section 6.4.1 - Canterbury Regional Policy Statement.

⁴ Planning Memorandum (file reference C26C/194891-4), Section 6.1.4 - National Policy Statement on Urban Development 2020.

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Costco Christchurch - FTAA-2608-1281
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Christchurch City Council		
*First name	Paul		
*Last name	Lowe		
Postal address	PO Box 73013, Christchurch 8154		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

7 October 2026

Stephanie Frame
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**FAST-TRACK APPROVALS ACT 2024 – CHRISTCHURCH CITY COUNCIL COMMENTS ON REFERRAL
APPLICATION OF COSTCO CHRISTCHURCH**

Application Number:	FTAA-2608-1281
Christchurch City Council Reference:	RMA/2026/3231
Project Name:	Costco Christchurch
Applicant:	Costco Wholesale New Zealand Limited and Miles Premises Limited
Address:	475 Memorial Avenue, 500 and 520 Avonhead Road and 400 Russley Road

1. The Christchurch City Council has been invited to provide written comments to the Minister for Infrastructure (the Minister) on the Costco Christchurch application (FTAA-2608-1281) to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.
2. The purpose of this memorandum is to provide comments under section 17(3) of the FTAA and respond to specific matters which the Minister has asked the Council to comment on.

Executive Summary

3. Having regard to the referral application, my overall position at this stage in the process is neutral.
4. In terms of servicing of the proposed development and any necessary roading provision or upgrades, having regard to the specialist input received there will be works required of the applicant to provide sufficient water and wastewater supply. Further detail is required to ensure that the infrastructure and servicing proposed is adequate to service the development and, where relevant, acceptable to vest in Council.
5. The infrastructure upgrades required to service the development are not identified in the Council's Long Term Plan. Accordingly, these upgrades will need to be undertaken at the cost of the applicant, or an amendment made to the Development Contributions Policy to enable Council to recover costs to undertake the upgrades.
6. As set out further in this response, the District Plan seeks to direct commercial and retail activities to the city centre and other centres as per the centres hierarchy. The application site is not within an identified centre and may be inconsistent with on the outcomes sought for centres under the District

Plan, including intensification within centres and a compact and sustainable urban form, noting 7900m² of retail activity is proposed in addition to the Costco Wholesale warehouse retail store itself.

7. In relation to urban design, the supporting urban design assessment is noted, and there are no significant concerns in relation to urban design matters. With regards to Transport, a detailed Integrated Transport Assessment is requested with any substantive application.
8. Whilst the above matters will require further consideration in any substantive application, there are not any known significant impediments to the proposal in terms of District Plan or Council infrastructure at the time of writing.

Proposal

9. The proposal is summarised at Section 1.1 of the Planning Memorandum provided by the applicant (as copied below). It is noted that the proposal includes materially more floor area than was indicated when comments were provided under s11, including 7900m² of retail activities and a tyre centre, food court and retail area of indeterminate sizes.
 - *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.*

10. The site is located at 475 Memorial Avenue, 500 and 520 Avonhead Road and 400 Russley Road. It is at the western edge of Christchurch and is currently vacant. It closely adjoins the Christchurch International Airport, an area of residential activity, a golf course and a motel. It fronts two major arterial roads (Russley Road and Memorial Avenue). The site is zoned as Industrial Park. The relevant overlays which apply to the site are set out in paragraph 6 of the s11 response.
11. The consenting history is set out in the Planning Memorandum provided by the applicant, which I agree sets out the relevant consenting history for the site

Prior Council engagement

12. The Council provided a memorandum (dated 25 August 2026) to the applicant, providing comments under FTAA section 11(1)(c). This memorandum is included as Appendix 1 to this letter and should be read in conjunction with this response.

Scope of comments

13. Noting the timeframe for comments and high-level nature of comments sought, the information provided in this memorandum is of a general nature and not exhaustive.
14. Sections 17(3)(a) and 17(3)(b) provide the scope for Council to provide comments on a referral application. The Council has been asked in your letter of 16 September 2026 to respond to the matters below.
 - a) *Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.*
 - b) *Any issues with referral in terms of facilitating the project, including in relation to the potential need to vary or cancel any existing conditions specified in consent notices*
 - c) *Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act)*
 - d) *Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of Act).*
15. Whilst some specialist comments from technical experts have been sought on the supporting information with the referral application, due to resourcing and timeframe constraints, not all supporting documents have been peer reviewed.

Specific matters

16. As above, the Council has been asked to comment on four specific matters. Those are addressed below.

Competing applications

17. With respect to s17(3)(a), no competing applications have been received for the application site. The applicant sets out the consent history at Section 3.3.3 of the supporting Planning Memorandum and whilst the site is subject to existing resource consents, these consents are not considered to be competing consents for the purposes of s17(3)(a).

Facilitation and consent notices

18. The Records of Title for the application site include consent notices relating to service connections, road upgrades and foundation design. Sections 3.3.1, 4.2 and 4.3 of the applicant's Planning Memorandum set out that these consent notices may require amendment, notably with respect to road upgrades. Records of Title also include a gazettal notice setting height limits and declaring State Highway 1 as a Limited Access Road.
19. Any variations or cancellations of the existing consent notices may be supportable subject to provision of sufficient information, appropriate alternative road upgrades where necessary, and the relevant design detail. This level of detail has not been provided with the referral application and therefore confirmation on whether the variation or cancellation of these consent conditions would be appropriate cannot be confirmed at this stage.

20. Having regards to the facilitation of the development, advice has been provided to the applicant under s11 with respect to servicing and roads, in general to the effect that the proposal would be acceptable in this regard subject to additional or upgraded services, roads, and detailed design. As above, the proposal includes a materially larger Costco warehouse and an additional 7900m² of other retail activities (for a total gross floor area almost triple what was initially proposed). The referral application includes information not previously available to Council specialists, including in relation to three waters, transport, and urban design. For these reasons, I have sought updated advice from the relevant specialists, but note the comments provided under s11 remain relevant considerations.

Water supply and wastewater

21. Ms Michele McDonald, Team Leader Asset Planning Water and Wastewater, has provided the following comments in addition to the comments provided through the s11 response:

- 21.1. In relation to information provided on firefighting supply, hydrant testing during an off-peak period cannot confirm that adequate capacity exists to service both 2/3rd of the peak demand as well as the required fire demand as required in the FENZ SNZ PAS 4509:2008. June 2026 is a low demand period, and it is not stated whether the Council process has been followed that requires the closest pump station to be placed out of service to emulate a peak demand scenario. Furthermore, the location of the hydrant testing has not been provided and should therefore not be considered as a fact. Council determines available capacity by considering both peak demand and capacity to service the future demand, not just what is now achievable. Fire hydrant testing needs to be completed in accordance with the WS5 - Flow Test Application Form which requires the closest pump station to be switched off (Burnside) to emulate peak demand conditions. That said, we believe that the water supply zone can support the required demand but will require the upgrade of the DN100 water main in Memorial Ave and the DN150 water main in Avonhead Road.
- 21.2. As advised, upgrades to the Memorial Avenue and Avonhead Road water mains will be required to support an FW4 fire flow under peak demand conditions. This was consented in terms of RMA/2022/1411. The detail in the engineering report confirm that water mains will be upgraded in Avonhead Road and Memorial Avenue but the executive summary does not.
- 21.3. Upgrades to existing Council infrastructure will have to be conditioned as was done under RMA/2022/1411 (which was consent for subdivision and land-use of the application site). Wastewater odour treatment conditions were also included in RMA/2022/1411. It would be appropriate to add a consent notice to secure the sewer discharge limit.

Stormwater

22. Mr Brian Norton, Senior Stormwater Planning Engineer at Council, has provided the following comments on review of the application:

- 22.1. I agree with the fundamental methodology outlined in the Infrastructure Report for the mitigation of stormwater quality and quantity effects: treatment of the first flush of runoff via approved proprietary device (Stormwater360 Filterra or equivalent), followed by disposal of stormwater up to the critical 2% AEP rainfall event into land via rapid soakage.
- 22.2. Council's Avon flood model shows that the site is unlikely to be substantively impacted by predicted flooding. The site contains several local depressions (historic Waimakariri flood channels) where shallow ponding of runoff is predicted to coalesce. These low-lying areas

will be filled in during construction, replaced by a network of overland flow paths along internal roads, ultimately discharging to Memorial Avenue or Avonhead Road. Safe building heights will be set based on the modelling of these internal flow paths at time of subdivision consenting and engineering review.

- 22.3. In lieu of the minimum above-ground storage requirement that Council typically requires for soakage systems, I recommend that a duplicate redundant “capped off” set of rapid soakage systems be installed as a backup rapid soakage system to be used in the event of primary soakage system failure. This alternative to above-ground storage will be accepted on the basis of the site’s proximity to CIAL, and the consequential birdstrike issues that arise with the practice of above ground ponding of stormwater.
- 22.4. It’s not clear which stormwater mitigation assets will vest to CCC, versus which assets will be privately owned and maintained. Council is obliged (Integrated Water Strategy, Goal 4, bullet point 2) to seek collective, integrated management of stormwater wherever practicable in order to maximise efficiency, cost effectiveness and ease of maintenance. In addition to the reasonings outlined in the Surface Water Strategy, there are increased risks to the environment with reliance on the maintenance of stormwater mitigation systems by private site operators where such activities are not their core business. Furthermore, the separate consenting of such devices (private discharges of non-residential sites into land are often excluded from the Council’s Comprehensive Stormwater Discharge Consent (CSNDC, CRC252424) leads to unnecessarily complex consenting arrangements. As an example, take a spill of diesel fuel during a rainstorm on the intersection of a public road (served by CCC vested stormwater systems) and a private road (served by privately owned stormwater systems servicing multiple retail properties). Who is responsible for managing the spill? Who is responsible for operating a shut off valve to prevent the contaminants from entering the rapid soakage system? If the spill does enter the system, who is ultimately liable for the contamination of groundwater? Having different portions of a site being serviced by a mix of public and private stormwater systems operating under different discharge consents adds complexity and risk to emergency management and enforcement. I strongly recommend that all treatment and disposal systems (with the exception of rapid soakage systems for building roofs) be located collectively and vested to the Council as public assets.
- 22.5. Discharging potentially contaminated stormwater into land can adversely affect water quality of nearby water supply bores. Council’s CSNDC has conditions (Condition 32) on the setbacks of soakage systems from water supply bores, and requires a specific investigation where setbacks are not met. I acknowledge that that applicant’s water quality experts have provided such an investigation (Hydrogeological Investigation and Infiltration Testing, page 47 of Attachment 6 – Infrastructure Design Report, Eliot Sinclair) and will recommend that this be supplied to Environment Canterbury for review and acceptance.
- 22.6. I will recommend consent notices on all building lots to restrict roof materials to low-zinc and low-copper generating materials, as roof water will be discharged into land without treatment. Furthermore, I will recommend consent notices for retail fuel sites to comply with MfE Environmental guidelines for water discharges from petroleum industry sites in New Zealand and for any sites engaging in HAIL activities to have a Stormwater Quality Management Plan prepared by a suitably qualified and experienced person.

Transport

23. Mr Liqi Chen, Transport Network Planner at Council, has reviewed the proposal, including the supporting Transport Assessment. Noting this is a high-level strategic assessment and Mr Chen considers that a comprehensive ITA should be provided with any substantive application to provide a

more detailed understanding of transport effects. Mr Chen has provided the following comments on the referral application:

- 23.1. Stantec's Traffic Assessment has identified several of the primary matters requiring further assessment, including detailed traffic generation, weekday and weekend demand, traffic assignment and network modelling, access and intersection performance, parking, servicing, active-mode connections, public transport, road safety, and construction traffic. The proposal retains the principal access framework anticipated in the existing ODP, including a signalised full-movement access from Memorial Avenue, a secondary left-in/left-out access and an internal road connection to Avonhead Road.
- 23.2. However, I consider that there is inadequate information to demonstrate the suitability of the existing framework for the proposed Costco warehouse, fuel facility, and large-format retail. In particular, the relying on an assumption of PM peak-hour generation previously assessed for the wider industrial park, as a comparable baseline is not sufficient to establish equivalent transport effects. The current Fast Track proposal clearly indicates a highly retail-concentrated development, that is likely to have a materially different trip profile, distribution, demand, access usage, and queuing effects from the previous assessed mixed industrial and commercial site.
- 23.3. Therefore, I would expect any substantive application to be supported by a comprehensive ITA in accordance with the relevant District Plan requirements. The ITA should assess the current proposal, together with the other development enabled and anticipated across the wider area, rather than relying only on the previously assessed peak-hour volume. In general, I recommend following matters to be clearly addressed in the full ITA:
 - 23.3.1. Clearly define the proposed development, associated staging, and future year scenarios. The future year assessment should include the complete Costco development, Lots 1 and 2 as consented, remaining development enabled, relevant airport growth, neighbouring consented developments, and any other foreseeable developments within wider area.
 - 23.3.2. Provide an evidence-based assessment of trip generation for the Costco warehouse, fuel facility and large-format retail. This should cover the both weekday and weekend periods and account for linked, pass-by and diverted trips, staff travel, servicing and heavy vehicles.
 - 23.3.3. Demonstrate the expected distribution and assignment of development traffic across Memorial Avenue, SH1, Avonhead Road and the surrounding network. The assessment should integrate the proposal together with relevant cumulative development and identify any material effects on the strategic and local road networks. The modelling scope, assessment periods, future scenarios, and key assumptions should be agreed with CCC and NZTA.
 - 23.3.4. Assess the operation of the proposed signalised access, secondary left-in/left-out access, and interaction with the SH1/Memorial Avenue interchange, and the neighbouring Commodore Hotel access. Further, the proposals should make provision for internal connection to Commodore Hotel as envisaged in the current Outline Development Plan for the site. In particular, signal coordination, turning lane capacity, queue storage, spillback, lane changing and the potential for queues to affect the interchange, hotel access or site accesses.

- 23.3.5. Assess the volume and type of development traffic expected to use the Avonhead Road and demonstrate that traffic distributed through Avonhead Road into surrounding residential network can be accommodated appropriately. It should also identify any access management or traffic-calming measures required and demonstrate how heavy service vehicles will be directed away from Avonhead Road.
- 23.3.6. Demonstrate that the access arrangements, internal road network, parking, fuel-facility queues, loading and servicing can operate effectively and safely and identify compliance with relevant CCC infrastructure and construction standards.
- 23.3.7. Assess walking, cycling and public transport accessibility, including connections through the site to surrounding roads and nearby bus stops. The ITA should also include an appropriate assessment of road-safety effects and identify any necessary safety audits or mitigation measures. The application should adopt the cycle provision along the site frontage to Memorial Ave to reflect this key element as anticipated under the existing ODP.
- 23.3.8. Clearly identify any transport infrastructure, controls or other mitigation required to support the development, demonstrate that the transport framework can support the proposed development and that any effects on SH1, Memorial Avenue, Avonhead Road and the surrounding network can be appropriately managed.

Infrastructure upgrades and Funding

- 24. Highlighting the advice outlined above, infrastructure upgrades will be required to service the development, which are likely to be acceptable subject to the provision of an appropriate level of information for a substantive decision and detailed design. Noting the greater floor area now proposed, additional upgrades may now be required to suitably service the development.
- 25. The applicant will need to demonstrate how the upgrades to infrastructure can be achieved such that the development can be appropriately serviced. Infrastructure required to provide capacity to service this development that is not in the current Long-Term Plan will need to be undertaken by the applicant or funded via amendments to the Development Contributions Policy, as no Council funding for upgrades required to facilitate the development is available.

Urban design

- 26. Mr David Hattam, Council Senior Urban Designer, has provided the following comments on the referral application:
 - 26.1. Other than the petrol station, the proposal is to be located at the rear of the site, away from Memorial Avenue. It appears that the petrol station will be providing a wide landscape strip which will be in line with the expectation in the district plan. It is likely this would be an appropriate transition to the fuel station, even if the requirements regarding buildings and parking spaces are not met. The previous comments on signage I made are still relevant.
 - 26.2. The rear interface will also be important. It appears that this will comprise a substantial planted interface, including trees, and if so it is likely to be appropriate given the underlying zoning.
 - 26.3. The establishment of the collector road is a benefit to the wider area and a positive aspect of the proposal, in general accordance with the existing subdivision and Outline Development Plan. It should be suitably formed and include trees and footpaths,

- 26.4. Memorial Avenue has a centre median with trees, which contribute to its appearance as a gateway to the city. The impact of turning lanes on this may be significant although the landscaped frontage would be some mitigation for this.
- 26.5. In relation to the urban design report Mr Hattam provides the following comments:
- 26.5.1. Under 2.1, it is not obvious the development is part of a commercial cluster involving the airport. In particular it seems quite difficult to walk between the two places, or at least the experience is unpleasant, through the underpass and exposed multi-legged crossings. It would be good to have some detail on how the urban designer has reached this conclusion, because it is not self-evident from an urban perspective.
- 26.5.2. Under 2.2, I agree with the statements that have been made. The detail of the interface with Avonhead Road will be important, as is recognised in the report. There would be benefits of some activation onto Avonhead Road from the Large Format Retail, if this occurs. The detailed design will be important here.
- 26.5.3. Under 2.3, surface carparking, it would be useful to have more consideration of how parking affects how pedestrians and cyclists will use the space. For instance people may prefer to walk past shop-fronts than a road through a car park. The best outcome would result from pedestrian design occurring at an early stage to consider these matters. Consolidating surface parking is not usually considered a good urban design approach, because it can create quite a hostile and exposed environment although there may be separate practical reasons why the developer would choose to lay out the site in this way. Trees can be mitigation for this to some extent, but it is very rare for these to be allowed to grow to the scale required so I would disagree that this can be considered a positive effect as the author seems to imply. Some reasoning would be useful here.
- 26.5.4. Under 3.0 it would be useful for the author to identify what the clear urban design merit is that he has noted. I would agree that the site is “well located to serve a regional catchment, is readily accessible from Christchurch’s strategic transport network and the proposed activities and broad scale of development are compatible with the Site’s airport-influenced industrial context”, but these are all high-level strategic planning matters. It would perhaps be more accurate to say that the proposal does not raise any substantial urban design concerns given the zoning. Nonetheless, this suggests that the proposal can progress from this stage, even if clearer reasoning is needed at the detailed design stage.

Reserves

27. I note that the s11 response identified the potential reserve locations in the Outline Development Plan which applies to the site as potentially appropriate for smaller “Pocket Parks” which may be utilised by workers or visitors. However, Mr Peter Barnes, Council Senior Parks and Policy Planner, on review of the referral application, has stated that the Parks Unit do not seek designated open space or pocket park areas within the development area.

Ineligible activities

28. Ineligible activities are defined in s5 of the Act. While many of the listed ineligible activities do not relate to District Council functions, the proposal does not appear to include an ineligible activity as

per Schedule 5. In particular, the application site is not known to be Māori land, Māori customary land, Māori reservation or a reserve under the Reserves Act 1977, nor is it within the EEZ or ORS, and the proposal is not for aquaculture.

Reasons to decline

29. You have asked whether Council considers any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of Act). These matters are addressed in further detail, in addition to the relevant matters under s22.

s21(5)(a)

30. The project is not inconsistent with any of the matters in this clause in my opinion

S21(5)(b)

31. I acknowledge the applicant's advice with respect to whether the proposal would be more appropriately dealt with under other Acts, including with respect to notification. I consider there is insufficient information to consider whether notification would be required but note that notification would not be precluded by the District Plan.

s21(5)(c)

32. The referral application does not include enough information or detail to determine whether effects would be significant, noting that that is a relatively high bar and that the substantive application and decision may be able to manage effects such that they are not significant.

s21(5)(d) - (f)

33. There is no evident history apparent of any compliance issues or relevant Treaty settlement, and the activity is not a prohibited activity.

s22

34. The referral application discusses the assessment criteria in s22 as follows.
- Section 3.0 sets out in response to the criteria in s22(1)(a) that the proposal will deliver significant regional benefits, in particular via construction and operation of Costco and increased competition in the grocery market.
 - Section 3.1 addresses s22(2)(a)(i), (a)(iv), (a)(vii), (a)(ixa) and (a)(x) of the Act.
 - Section 3.2 addresses s22(1)(b). It opines that the fast-track process will be timely and more cost efficient than standard consenting processes under the Resource Management Act.
35. Noting that no peer review of the economic assessment supporting the referral application has been completed, I do not offer any comment on this matter in relation to any significant regional or national benefits of the proposal as per s22(1)(a) and s22(2)(a)(iv).
36. In regard to s22(a)(x), the applicant's assessment (at Section 6.4.2 of the Planning Memorandum) considers that the proposal is consistent with Objective 3.3.8 because the site is within the existing urban area of Christchurch and is consistent with Policy 16.2.1.4 on the basis that the economic advice from Insight Economics finds that the proposal is unlikely to generate significant retail distribution effects or undermine the role and function of the established centres network. The Council's response to the notice of referral (Attachment 1) addresses District Plan matters generally

in paragraphs 11-17. That response also discusses the Planning Bill (as it was then) briefly, in paragraph 18.

37. The Council has not sought a peer review of the Insight Economics assessment as part of this response and therefore cannot comment on the findings of the assessment in relation to retail distribution effects in detail. However, whilst the consideration of effects on retail distribution would be relevant under the current District Plan framework, under s104(1A)(c) of the Planning Act 2026, effects on retail distribution must be disregarded when considering the effects of a district land use activity. As such, it is acknowledged that any effect on retail distribution from the proposal would be disregarded under this framework, noting that at the time of response, the transitional provisions have not yet come into effect.
38. Whilst retail distribution effects may be disregarded, as was noted in the s11 response provided, the proposed effect on locating commercial activities within industrial zoned land in relation to the availability of industrial land supply would need to be considered. Whilst it is noted that the Insight Economics report states that feasibility investigations have failed to identify a viable industrial scheme for the site, as noted, this report has not been peer reviewed.
39. While the proposed Costco and associated parking requires a very large area that is likely not available within the City Centre or a Key Activity Centre (due to the availability of the required land area) and may not align with the smaller scale outcomes sought in the Town Centre or Local Centres, the additional retail component proposed through this application could potentially be accommodated in the existing centres hierarchy and therefore is more likely to have effects on centres than wholesaling activities in relation to supporting the viability of centres for intensification and supporting a consolidated and sustainable urban form. As no tenants have been confirmed, there is not currently any known nexus between the additional retail activities and the proposed Costco.
40. In relation to 22(2)(a)(vii), I note that while good access to arterial roads and the airport will contribute to reduction of greenhouse emissions, staff and customers may have longer trips given the location of the site on the western edge of the city.

General comments

41. It is expected that any substantive application will include assessments to address effects including, but not limited to:
 - Noise (from the activity and, in particular heavy vehicles servicing the activity);
 - Earthworks;
 - Geotechnical matters;
 - Natural hazards;
 - Natural heritage;
 - Indigenous biodiversity and ecosystems; and
 - Effects on strategic infrastructure.

42. Council does not hold any information to suggest that assessments containing more information than is typical for a combined subdivision and land use resource consent application would be required to enable comments at substantive stage, if the application is referred.

Owen Jeffreys

Planner

A handwritten signature in blue ink, appearing to be 'PL', is positioned above the name Paul Lowe.

Paul Lowe

Delegated Officer / Manager Resource Consents

Attachment 1 - CCC Section 11 response

25 August 2026

Costco Wholesale Australia Pty Ltd

c/- Fern Beck

Barker and Associates

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By email: S 9(2)(a)

Fast-track Approvals Act 2024 – Notification of Intent to Lodge Referral Application

Costco Wholesale Australia Pty Ltd – 475 Memorial Avenue, 500 and 520 Avonhead Road and 400 Russley Road

1. The Christchurch City Council ('CCC') received a notification from Costco Wholesale Australia Pty Ltd ('Costco') on 29 July 2026 advising of their intention to lodge a referral application under section 13 of the Fast-track Approvals Act 2024 ('FTAA'). The notification from Costco is reproduced in full below.
2. The purpose of this memorandum is to respond to this notification under FTAA section 11(1)(c) and identify matters that the applicant may want to consider prior to lodging a referral application.

Kia ora,

We are writing on behalf of Costco Wholesale Australia Pty Ltd regarding the properties located at 475 Memorial Avenue, 500 and 520 Avonhead Road, and 400 Russley Road in Avonhead, Christchurch shown in the locality diagram below (the site).



Costco Wholesale Australia Pty is in the process of preparing a referral application under the Fast-Track Approvals Act 2024 (FTAA) for the Project.

Project overview

At a high level the scope of the activity includes:

- Establishment of a new Costco Wholesale warehouse retail store and associated customer and staff parking;
- Establishment of a fuel station;
- Establishment of approximately 8,00m² to 10,000m² of retail activity, with associated customer and staff parking;
- Amendments to the approved subdivision boundaries and the construction of vehicle access points (with associated removal of street trees) to support the development; and
- Enabling works, including site preparation, earthworks, and the installation of supporting infrastructure and services.

Approvals

A referral application must specify all approvals proposed under the FTAA. The approvals anticipated for this Project may include but are not necessarily limited to:

- Schedule 5 approvals under the Resource Management Act 1991 ("RMA");
- Schedule 7 approvals under the Wildlife Act 1953 (if applicable); and
- Schedule 8 approvals under the Heritage New Zealand Pouhere Taonga Act 2014 (if applicable).

The FTAA (as amended) requires the following prior to lodging a referral application with the Environmental Protection Authority (EPA):

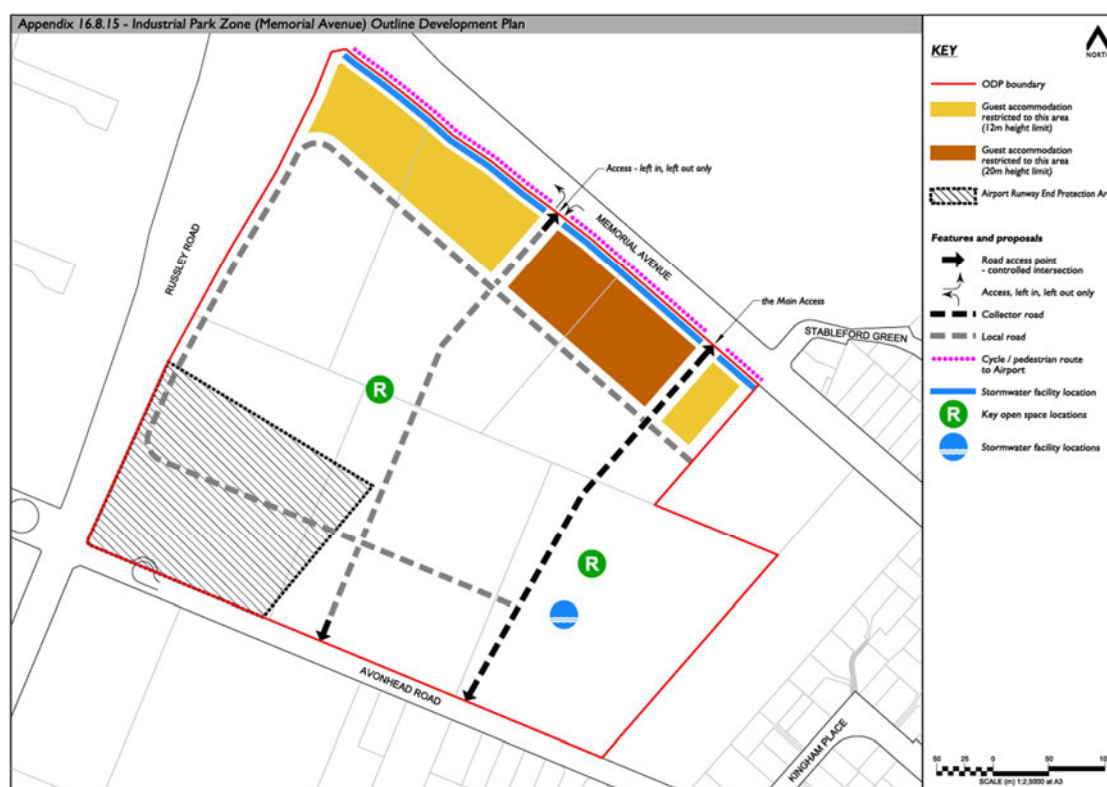
- Consultation requirements under section 11(1)(a), where relevant; and
- Written notice to relevant local authorities, iwi authorities, hapū, Treaty settlement entities, and administering agencies.

In accordance with section 11 of the FTAA, Costco Wholesale Australia Pty Ltd gives notice of its intention to lodge a referral application for the Project.

3. The advice to follow is based on the understanding of the notification that the complex would consist of one Costco retail warehouse of an unknown floor area, one fuel station, and other retail activities with a floor area of between 8000m² (noting the referral says 800m²) and 10000m².
4. To summarise, the Council officer's position at the current time is neutral, noting the limited information provided by Costco, but that there are distributional effects that should be carefully considered (as per Policy 16.2.1.4 in particular) and road network and servicing upgrades required.

Site and area context

5. The site is located at 475 Memorial Avenue, 500 and 520 Avonhead Road, and 400 Russley Road, as shown above. The site is identified in Councils GIS system as being Lots 1 and 2 DP 553686, Lot 5 DP 28780, and Sec 8 SP 544350.
6. The site is zoned Industrial Park and is subject to a number of map overlays in the District Plan:
 - Designation D1: Christchurch International Airport Limited; Christchurch International Airport;
 - Designation P5: New Zealand Transport Agency: State Highway 1 (Proposed Russley Road Widening: Harewood Road to Avonhead Park);
 - 50 dB Ldn Air Noise Contour;
 - 55 dB Ldn Air Noise Contour; and
 - Christchurch International Airport Protection Surfaces.
7. The site is also subject to the Outline Development Plan at Appendix 16.8.15 of the District Plan. It seeks to provide guest accommodation activities to Memorial Avenue, an internal road network, open space and stormwater management. The black hatching denotes the eastern edge of Designation D1. The Written Approval of the Requiring Authority would be required for any works not provided for by that designation.



8. The site fronts two Major Arterial Roads (Memorial Avenue and Russley Road) and a Collector Road (Avonhead Road). The District Plan does not identify any natural hazard on the site, noting paragraph 8.2 below.
9. The relevant Records of Title include the following interests:
 - Titles for 475 Memorial Avenue and 500 Avonhead Road include consent notice 11898381.3 limiting activities to Avonhead Road until road upgrades have occurred, and requiring specific foundation design; and
 - Titles for 475 Memorial Avenue, and 500 and 520 Avonhead Road include a gazettal limiting the height of structures and vegetation.

10. The site is also:

- A listed HAIL site (E1 - Asbestos products manufacture or disposal, A10 - Persistent pesticide bulk storage or use. G5 - Waste disposal to land, G3 - Landfill sites).
- Shown in the Council's Flood and Floor Level Viewer as being partially subject to inundation. Assessment would be required under the National Policy Statement on Natural Hazards and s106A of the Resource Management Act 1991 (or any successor thereto).

District Plan

11. Chapter 16 of the District Plan zoning includes objectives and policies relating to industrial zones, including elements specific to the Industrial Park zoning and to the 'western gateway', both of which are applicable to the application site. Objectives and policies seek, in summary, to maintain the supply of industrial land and to maintain the function of the zone, notably at Policy 16.2.1.4. As above, the applicable Outline Development Plan includes a guest accommodation element in this location adjoining, as it does, the Christchurch International Airport. A high level of amenity is sought to Memorial Avenue.

12. Chapter 3 (Strategic Directions) of the District Plan includes 18 high level objectives, including Objective 3.3.8 seeks a well-integrated pattern of development, including with respect to maintaining functionality of the City Centre, Key Activity Centres, Town Centres and Local Centres. The proposal is to locate a Costco retail warehouse and 10000m² of additional retail outside of those centres.

13. The application site is not within any of these centres and the Council would (currently) expect any application, fast track or otherwise, to include an assessment of the distributional effects of the proposal on these centres from a suitably qualified and experienced economist.

14. Any application would also need to carefully consider the proposal in terms of Policy 16.2.1.4 (below) for the same reasons, noting that this policy is an 'avoid' policy.

16.2.1.4 Policy - Activities in industrial zones

- Maintain and support the function of industrial zones while, subject to Clauses (b) and (c), providing for limited non-industrial activities that:
 - are **ancillary** in scale (subject to Clause (d)) and on the same **site** as a permitted or consented activity;
 - are not appropriate in more sensitive environments due to their potential noise, odour or other environmental effects;
 - incorporate characteristics that are compatible with the industrial zone and do not cause an undue constraint on other permitted activities within the zone;
 - comprise **yard based supplier** or **trade suppliers** in the Industrial General Zone;
 - provide **emergency service facilities** and/or **community corrections facilities**;
 - support the needs of workers and businesses in the zone including **food and beverage outlets**, **commercial services**, **gymnasiums**, and the care of children;
 - meet the convenience needs of residents, workers and businesses in the Industrial General Zone (Waterloo Park) in a **Neighbourhood Centre**;
 - are rural activities associated with the irrigation of food processing wastewater in the identified area of the Industrial Heavy Zone (South West Hornby) (**Appendix 16.8.8**) that is integral to the ongoing operation of an established industrial activity;
 - are **recreation facilities** in the industrial General Zone that:
 - provide for active indoor **recreation activities** that due to scale are not appropriately located in the **Central City** or a **commercial centre**; and
 - are located near a commercial centre to support that centre; and
 - do not give rise to reverse sensitivity effects on industrial activities, and do not undermine the ability of industrial activities to continue to operate or establish in the zone.
- Avoid any activity in industrial zones with the potential to hinder or constrain the establishment or ongoing operation or development of industrial activities and **strategic infrastructure**, or with the potential to be exposed to unacceptable risk. This includes but is not limited to avoiding:
 - sensitive activities** located within the 50 dB **L_{dn}** Air Noise Contour, the Lyttelton Port Influences Overlay Area, the Woolston Risk Management Area and in proximity to the **National Grid**;
 - non-sensitive discretionary or non-complying activities specified by Rule 16.4.1.4 D1, Rule 16.5.1.4, and Rule 16.5.1.5 NC1 in the Woolston Risk Management Area unless the proposed activity in its location meets risk acceptability criteria appropriate to the applicable land use.
- Avoid the use of industrial zones for non-industrial activities that could adversely affect the strategic role of the **Central City**, **Town Centres** and **Local Centres** as focal points for **commercial activities**, **community activities**, **residential activities**, and other activities.
- Provide for **ancillary** activities, recognising their role in supporting industry, while being incidental in scale and function to a principal activity on the same **site**, and not inconsistent with Clauses b. and c..

15. For completeness, Objective 3.3.8 is reflective of Objectives 6.2.1, 6.2.2 and 6.2.5 of the Canterbury Regional Policy Statement, in particular, with other objective and policies in Chapters 5 and 6 being relevant also, including with respect to servicing, strategic infrastructure and transportation. In addition, the Greater Christchurch Spatial Plan seeks to focus employment and service functions to a network of urban and town centres across Greater Christchurch.

3.3.8 Objective - Urban growth, form and design

- a. A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that:
- i. Is attractive to residents, business and visitors; and
 - ii. Has its areas of special character and [amenity value](#) identified and their specifically recognised values appropriately managed; and
 - iii. Provides for [urban activities](#) only:
 - A. within the existing urban areas unless they are otherwise expressly provided for in the CRPS; and
 - B. on [greenfield](#) land on the periphery of Christchurch's urban area identified in accordance with the Greenfield Priority Areas in the [Canterbury Regional Policy Statement Chapter 6, Map A](#); and
 - iv. Increases the housing development opportunities in the urban area to meet the intensification targets specified in the [Canterbury Regional Policy Statement, Chapter 6, Objective 6.2.2 \(1\)](#); particularly:
 - A. in and around the [Central City](#), [Key Activity Centres](#) (as identified in the [Canterbury Regional Policy Statement](#)), [Town Centres](#), and [Local centres](#), and nodes of [core public transport routes](#); and
 - B. in those parts of Residential Greenfield Priority Areas identified in [Canterbury Regional Policy Statement Chapter 6, Map A](#); and
 - C. in suitable [brownfield](#) areas; and
 - v. Maintains and enhances the [Central City](#), [Key Activity Centres](#), [Town centres](#), and [Local centres](#) as community focal points; and
 - vi. Identifies opportunities for, and supports, the redevelopment of [brownfield](#) sites for residential, business or [mixed use](#) activities; and
 - vii. Promotes the re-use and re-development of [buildings](#) and land; and
 - viii. Has good [accessibility](#) for all people between housing, jobs, community services, natural spaces, and open spaces including by way of public and active transport; and
 - ix. Promotes the safe, efficient and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure; and
 - x. Co-ordinates the nature, timing and sequencing of new development with the funding, implementation and operation of necessary transport and other infrastructure.
16. Chapter 3 also includes Objective 3.3.13 relating to protection of strategic infrastructure and Objective 3.3.15 relating to incompatible activities. They are relevant in this instance due to the proximity to the Christchurch International Airport and the state highway network. The Council would expect any application, fast track or otherwise, to include advice from suitably qualified and experienced persons with respect to both.
17. In addition, the Council had initiated Plan Change 20 which, generally speaking, proposes changes to the Plan to provide greater amenity for residential zoned land that adjoins industrial land, and also to re-zone some sites (though none in proximity to the application site). Plan Change 20 is currently subject to national Plan Stop rules, which pause some plan changes while New Zealand transitions to a new resource management system. The Council has sought Ministerial approval to continue.

Planning Bill and standard resource consent processes

18. The Planning Bill proposes to amend s104(1A) of the Resource Management Act to prevent Councils from considering any of the below. Section 104(1A) remains in draft form as of the date of this letter but the most recent form is set out below. Clauses (a), (c) and (f) are relevant to this advice, noting reference above to objectives and policies that manage distributional effects in particular. While these preclusions cover retail distribution, my view is that any application would need still to address effects on centres and on industrial land supply.

- (1A) A consent authority must not have regard to any of the following when considering effects on the environment for any purpose under a district plan. When considering the effects of a district land use activity, a consent authority must disregard any adverse effects arising from the following matters:
- (a) the internal layout of a building or the external layout of any building on a site if the effects of the external layout remain within the boundaries of the site;
 - (a) any of the following:
 - (i) the presence, absence, nature, or extent of windows in relation to street, balconies, or outdoor living space;
 - (ii) the internal fit-out;
 - (iii) the minimum unit size;
 - (iv) the outlook space;
 - (v) landscaped areas for the construction of a building (except in relation to permeability);
 - (b) negative effects of development on trade competition, including on competing providers of input goods and services;
 - (c) effects on retail distribution;
 - (d) in relation to a project,—
 - (i) any lack of demand for the project; or
 - (ii) the fact that the project is not financially viable;
 - (e) the type of residents to be housed in a new development;
 - (f) views from private property.
- (1B) When forming an opinion for the purposes of subsection (1)(a) considering an application for a district land use consent, the consent authority may disregard a national environmental standard, a plan or proposed plan, a national policy statement, or a regional policy statement to the extent that it regulates or purports to regulate a matter described in subsection (1A).
- (1C) A person who exercises a power or performs a function under this Act must not, except as provided in Schedule 1 of the

Infrastructure and servicing constraints

Water supply

19. Advice from Council's Three Waters team with respect to water supply to the site is in that the site is not currently serviced by a suitable water supply system to accommodate either peak demand or firefighting demand. Appropriately sized water mains will need to be established and must ring-feed through site. The water main extension requirements would be extensive and will have to link into Memorial Avenue at Roydvale Avenue and into Avonhead Road at Hawthornden Road. The Council will not be providing these connections nor upgrades of existing water mains and it is noted that existing Development Contributions do not provide for these upgrades.

Wastewater

20. Advice from Council's Three Waters team with respect to wastewater connection is that capacity has been provided in the sewer main in Avonhead Road to service this site, albeit the site is within an area where average discharge from the site is limited to 0.09 L/s/ha. The Council will not be providing these connections nor upgrades of existing water mains and it is noted that existing Development Contributions do not provide for these upgrades.

Stormwater

21. Advice from Council's Three Waters team with respect to stormwater is summarised below. There do not appear to be any significant barriers to the proposal, notwithstanding the lack of available detail currently. The Three Waters team will seek:

- Integrated stormwater management within a reserve (or reserves) to vest to Council, meeting the Council's 'six values' approach. They prefer fewer individual facilities, but note that the site is shaped to have at least two separate surface water sub-catchments.
- Treatment of the 'first flush' of stormwater from hardstand and roading via soil adsorption basin.
- Detention storage and rapid infiltration for storms up to the critical 2% AEP "50-year" event.
- The proximity of this site to the airport will mean infiltration systems will need to manage the duration of ponding within basins so as to avoid becoming attractive to birds.
- Roof water discharge into land on individual sites via sealed stormwater systems separated from all other runoff
- Capture, conveyance and disposal of all stormwater up to the critical 2% AEP event using a combination of pipe systems and overland flow paths
- Any contamination within stormwater mitigation areas must be appropriately remediated and/or mitigated and quality management plans for any activity engaging in HAIL activities.
- Preclusion of high zinc or copper generating roof materials, unless the roof runoff is treated.
- Pre-treatment of hardstand run-off on-site utilising a gross pollutant trap to prevent heavy contaminants or spills from fouling the soil adsorption basin.
- Preclusion of individual sites treating and disposing of first flush stormwater via private stormwater systems (due to maintenance concerns and the resultant higher risk of groundwater contamination).
- That the retail fuel station also comply with the MfE Environmental guidelines for water discharges from petroleum industry sites in New Zealand.

Transport

22. With regard to the existing transport environment and potential effects of a residential development of this scale, the Council's Transport team has advised, in summary:

- The proposal is expected to generate a significant volume of traffic throughout the day in excess of what can be expected from the current industrial park zoning. An Integrated Transport Assessment (ITA) must be provided with any fast track application and should include comprehensive transport modelling to demonstrate forecast trip generation, trip distribution, and the effects on the wider transport network, particularly the adjacent State Highway 1 network and nearby local road intersections.
- The ITA should assess the cumulative transport effects in consideration with neighbouring, existing, and anticipated planned developments in the area including the constrained intersections of Sawyers Arms/SH1 and Yaldhurst Road/SH1.
- Two vehicle accesses as included in the current Outline Development Plan can be accepted from Memorial Avenue. The primary access is likely to require upgrading to a signalised full intersection, while any secondary access is likely to need to be restricted to left-in/left-out movements.
- The performance of the proposed signalised intersection should be assessed in the interaction with the nearby SH1 interchange and the adjacent Commodore Hotel access, including upstream and downstream operational effects.
- The internal road connections should be designed to provide access for all modes and designed to minimise 'rat-running' between Avonhead Road and Memorial Avenue and adopt current planned forms onto Memorial Avenue.

- The site frontage road, internal roads, and vehicle access arrangements should be designed and constructed in accordance with the relevant CCC Infrastructure Design Standard and Construction Standard Specification requirements, and subject to Council's Engineering Approval.
- The proposed layout should incorporate an operational and servicing strategy that avoids heavy vehicles using Avonhead Road.
- The future development should provide logical connections to adjoining developable land to support future development opportunities where appropriate.

Design and integration

23. With regard to design and integration with existing urban areas, the Council's Urban Design team notes:

The collector road connection through the area is important for the wider connectivity of the area as well as the site itself (linking Memorial Avenue to the area south of Avondale Road). It is not clear if this connection is to be provided. Some legal pedestrian access through the site should certainly be included.

Objectives and Policies in the District Plan recognise the importance of the high amenity of Memorial Avenue and the "Western Gateway" to the city and require development to have a high visual and aesthetic quality. This recognises the use of the road as a main point of entry to the city for visitors, and the high standard of amenity that has been provided within the corridor through much of its length (Objective 16.2.4 and policy 16.2.4.1).

These policies are reflected in the Area specific requirements, including that there should be a 10m wide landscaping strip with 1 tree planted every 10m of frontage (Rule 16.6.6.2.5). For Russley Road, the plan anticipates a continuous screen of shrubs and trees.

The plan also anticipates that car parking will be at the side or rear of sites and where it is at the side should not comprise more than 40% of the site frontage. Furthermore, a 20m building setback is anticipated (rule 16.6.6.2.2). Specific signage rules apply, limiting signage in this setback to two double-sided signs with an area of no more than 10m². Assessment matters relating to a breach in the setback relate to variation in form, bulk and location; architectural treatment; the prominence of landscaping and display areas, use of colour and materials, amongst other things.

Collectively, these measures describe an expectation for a high-quality built form and landscaped frontage. No details have been provided in the application so it is not possible to say if it would achieve these aims.

I have considered other Costco sites (in Melbourne and Auckland). I would comment that the Auckland site does provide a substantial landscaped frontage, that the building has been articulated and that freestanding signage is minimal (and on-building signage is in proportion). The petrol station is similarly treated. An approach like this would likely be appropriate in Christchurch.



If other retail is to be included, then the plan guidance remains relevant. There should be an activated frontage to Memorial Avenue, behind a generous landscape strip (including trees) and parking should be a minority of any of this. Servicing and the backs of buildings should not be oriented to Memorial Avenue.

Finally, given the importance of the site as a gateway, the petrol station should not be located on the Russley Road corner.

Reserves and open space

24. With regard to the provision of parks and open space in new residential subdivisions generally, the Council's Parks Team advises:

... for the two "R" locations on the ODP it would be appropriate to locate smaller "Pocket Parks". Pocket Parks are typically for employees and visitors to a commercial/industrial area for passive recreation (say, 1000-1500m²). Because of limited size, pocket parks cannot offer much greenery or recreation opportunities that a neighbourhood park/ destination park typically offer. If pocket parks are well sited, they are highly utilised by workers/visitors who seek a quiet outdoors space close to their workplace. Locations adjacent to stormwater management area can assist with providing a "setting".

Funding of infrastructure upgrades

25. Any infrastructure required to provide capacity to service this development that is not in the current Long-Term Plan or Development Contributions Policy could not be funded by CCC or its successor.
26. The applicant will need to demonstrate how the upgrades to infrastructure can be achieved such that the development can be appropriately serviced. If unresolved and unfunded, CCC is able to refuse a request for infrastructure connections (under the Water Supply and Wastewater Bylaw 2022 and Stormwater and Land Drainage Bylaw 2022) until adequate capacity exists.

General comments

27. It is expected that any application would address noise effects (from the activity and, in particular heavy vehicles servicing the activity, earthworks, geotech, natural hazards, natural heritage, indigenous biodiversity and ecosystems; and effects on strategic infrastructure.
28. It is also expected that any application would clearly describe the significant national or regional benefits that might accrue from developing the site for retail activity as opposed to a site zoned for retail activities, within an existing centre, and where all servicing and infrastructure is available or funded. The fast track decision on the Delmore proposal considers what might be viewed as 'significant' benefits and Costco might refer to that for guidance.
29. There are also a range of National Policy Statements and National Environmental Standards that Costco should address in any fast track application.
30. The Outline Development Plan seeks that the road network and servicing connect to and through the site to adjoining land, including to the adjoining hotel complex to the east. Any application should consider how to achieve that connectivity in an appropriate manner.

Conclusion

31. It is recommended that the proponent consider and respond to the matters identified above in any fast track application. The Council's position at the current time is neutral, noting the limited information provided by Costco. As set out above, there are distributional effects that should be carefully considered and road network and servicing upgrades required. If those matters are able to be appropriately addressed, the Council is likely to be able to support the concept.

Andrew Long
Senior Planner

Authorised by:



Paul Lowe
Manager Resource Consents
25/08/2026

Attn: Stephanie Frame
Manager – Fast-track Operations

Submitted via Fast-track portal

7 October 2026

Dear Stephanie

FTAA-2608-1281 – Costco Christchurch Project Referral Application

This letter is in response to your request on 16 September 2026 for Christchurch International Airport Limited (**CIAL**) to provide feedback on the referral application by Costco Wholesale New Zealand Ltd and Miles Premises Ltd for the Costco Christchurch project (**Costco Project**).

1. Overview and Interests

Christchurch International Airport (**the Airport**) is the largest airport in the South Island and is regionally and nationally significant infrastructure. The Airport supports 24-hour international and domestic operations and is the South Island's primary air freight hub.

The wider Airport campus extends across approximately 1,300 hectares and accommodates a broad range of aviation, freight, commercial and supporting activities. It is located approximately 250m west of the Costco Project site, thereby making CIAL a substantial landholder and operator within the wider area with a significant interest in the development of the site.

Given its proximity to the Airport, the development of the Costco Project site must respond appropriately to the Airport and its operations. This requirement is reflected in a number of existing planning and property mechanisms applying to the site, including the Airport Runway End Protection Area (REPA) designation (with CIAL as the requiring authority), various noise contours, Bird Strike Risk Management Area provisions and existing title restrictions relating to the height of buildings and structures.

CIAL notes that there has been no engagement with the applicants in relation to the Costco Project to date. Given the proximity of the site to the Airport, CIAL considers that substantive engagement during preparation of the substantive application is critical.

For the engagement exercise to be substantive, it needs to occur sufficiently early to inform whether the Costco Project, or particular elements of it, are appropriate in this location at all, as well as its detailed design and the technical assessments lodged with any substantive application. Early engagement is necessary to identify any fundamental aviation safeguarding or operational constraints before the proposal and its design become fixed.

The existing planning, designation and property controls applying to the site provide important safeguards, but compliance with those controls will not necessarily address the full range of effects the detailed design, operation and construction of a development in this location may have on aviation safety and the safe and efficient operation of the Airport.

This is particularly important in the fast-track context. The statutory process following lodgement of a substantive application is highly compressed and is not well suited to fundamental questions about the acceptability of a proposal, or material elements of it, being identified and worked through for the first time after lodgement. CIAL therefore considers that relevant airport safeguarding issues should be identified with CIAL at an early stage, so they can inform whether and in what form the proposal should proceed, as well as its design, assessment and mitigation.

CIAL's specific interests in the Costco Project relate to:

- Aviation safety and airport safeguarding; and
- Access and transportation

These matters are addressed in more detail below.

2. Aviation Safety and Airport Safeguarding

The planning, designation and property controls applying to the site provide important safeguards, but they do not themselves establish that a development will be acceptable from an aviation safety or airport operational perspective. Those controls address particular matters and, in some cases, particular thresholds. They do not replace an assessment of the potential effects of the particular development proposed, having regard to its location, scale, design, operation and construction and the way those matters may interact with Airport operations.

That distinction is particularly important for a site in such close proximity to the Airport and where use of the Fast Track process is proposed. Compliance with individual District Plan standards, designation requirements or title restrictions does not ensure safety. Early engagement with CIAL is therefore essential to identify whether the proposal gives rise to any aviation safeguarding or operational constraints which might affect whether the Project, or particular elements of it, are appropriate in this location at all and, if they are, what design, operational or mitigation measures are required. A coherent safeguarding assessment needs to occur *before* the substantive application is lodged, to ensure there is adequate evidence and time to consider that evidence, within the compressed fast-track process.

In addition to the critical need for a holistic safeguarding assessment as explained above, CIAL considers that the following matters should also be addressed through early pre-lodgement engagement with CIAL, both to identify any constraints on whether or in what form the Project can appropriately proceed in this location, and to ensure any substantive application contains a comprehensive assessment of the resulting proposal:

- **Airport Protection Surface and height restrictions** - Part of the site is within the Christchurch International Airport Protection Surface in the Christchurch District Plan which seeks to protect take-off and landing paths from physical obstructions. Existing title restrictions also impose limitations on the height of buildings and structures across parts of the site with a purpose of making Christchurch Airport safe for aviation purposes.

The detailed design will need to demonstrate how the requirements of the district plan and the title restrictions are met to ultimately protect the landing and departure paths from any obstructions that could impose on aviation safety.

- **Runway End Protection Area (REPA)** - Part of the site is subject to CIAL's REPA designation (D1 in the Christchurch District Plan). CIAL acknowledges that the indicative layout does not propose buildings or structures within the affected area. The REPA also restricts a range of activities, including the storage or release of hazardous substances, activities involving mass assembly, direct light beams or reflective glare, and activities that may attract birds.

As requiring authority for the designation, CIAL's prior written consent is required under section 176(1)(b) of the Resource Management Act for activities on the designated land that would prevent or hinder the purpose of the designation. The use and treatment of the REPA, including any reliance on that land to support the wider development, should therefore be addressed with CIAL if the proposal is developed.

- **Lighting and reflective materials** - External lighting, illuminated signage and reflective building materials can create glare, distraction or other visual effects that can affect pilot visibility during approach and landing. The application acknowledges that these details are yet to be finalised and CIAL seeks to ensure that the detailed design of these elements does not result in aviation safety risks.
- **Bird strike risk** - The site is within the Christchurch International Airport Bird Strike Management Area in the Christchurch District Plan. It is noted that the proposed stormwater

approach is based on collection through kerb and channel, sumps and a piped network, with treatment followed by discharge to ground through soakage. The detailed stormwater and landscape design should ensure that ponding, planting or other features do not create or increase bird-attracting habitat. The Planning Memorandum similarly recognises that this will require further consideration at substantive application stage.

- **Construction activities** - Construction methodology is not yet detailed. Given the proximity of the site to the Airport, CIAL would like to understand whether cranes or other tall construction equipment will be required, including for the erection of structural steel or concrete panels. Any temporary penetration of relevant aviation height surfaces will need to be identified and managed in consultation with CIAL.

3. Access and Transportation

The Costco Project is located close to one of the primary access and exit points to the Airport campus. Christchurch Airport is a lifeline utility¹ and maintaining safe, efficient and reliable access to and from the Airport is therefore particularly important. The Costco Project should not compromise this access or result in unreasonable delays for passengers, staff and other Airport users.

CIAL engaged Flow Transportation Specialists to undertake a high-level review of the referral-stage Transport Assessment. Based on that review, the following matters are of particular concern to CIAL and should be fully addressed before any substantive application for the Costco Project is lodged:

- **Traffic generation** – The traffic generation associated with the Costco Project is not yet clearly established, with the assessment relying on traffic generation previously assessed for the consented subdivision. Flow considers there is insufficient information to assume that the overall scale of traffic generation will be similar, given Costco's wider catchment and combination of bulk retail and supermarket activities. This is particularly important during the PM peak, and the substantive assessment should therefore consider Costco-specific traffic generation and its effects on Airport access.
- **Weekend traffic** – CIAL notes that weekend traffic effects are not yet understood. The previous assessment for the consented subdivision did not assess Saturday or Sunday traffic, which Flow considers a significant gap. Experience from Costco's Auckland operation indicates that its greatest congestion initially occurred on Saturday afternoons, while Sunday is also an important period for Airport traffic. Both Saturday and Sunday should therefore be considered in assessing the effects of the Project on Airport access.
- **Costco petrol station** – The proposed petrol station is located close to Memorial Avenue. Experience from Costco's Auckland operation indicates that queues for the petrol station can extend beyond the Costco site and onto the surrounding road network. The substantive assessment should demonstrate that petrol station queues can be accommodated within the internal road network without affecting Memorial Avenue.

4. Conclusion and Next Steps

Overall, CIAL does not oppose the Costco Project being referred to the fast-track approvals process. CIAL acknowledges the potential for commercial projects to have positive flow-on effects and recognise a thoughtfully planned and considered non-sensitive commercial use is generally well suited to this location.

However, the matters identified above will require further consideration as the proposal is developed to ensure that its detailed design, operation and construction do not adversely affect aviation safety or Airport operations, including access to and from the Airport.

CIAL therefore requests that the Applicants engage with CIAL during preparation of any substantive application so that these matters can be worked through and appropriately addressed as the detailed design is developed.

If the Project is referred, CIAL also requests that the referral decision:

¹ Defined by the Civil Defence Emergency Management Act 2002

- (a) requires a substantive application to include all information and technical assessment necessary to fully assess and address aviation safety and airport safeguarding, informed by appropriate pre-lodgement engagement with CIAL; and
- (b) specifies CIAL as a person from whom the Panel must invite comments on the substantive application.

The requirement in (a) would help ensure:

- (a) any fundamental constraints are identified before lodgement; and
- (b) the substantive application is fit to proceed through the compressed fast-track process, with the technically complex and potentially time-consuming aviation safety issues having been properly investigated and addressed in advance.

CIAL appreciates the opportunity to provide feedback on the referral application and looks forward to working constructively with the Applicants and the Fast-track team if the proposal progresses.



Karin Lepoutre
Principal Planner

Your written comments on a project under the Fast-track Approvals Act 2024

Project name	FTAA-2608-1281 Costco Christchurch
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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name	Director-General of Conservation Statutory delegations are in place for the Department of Conservation (DOC / the Department) to provide commentary on behalf of the D-G.		
*First name	David		
*Last name	Greaves		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz ;		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manager’s signoff


Linda Kirk

7 October 2026

Director-General of Conservation s17 comments

Project name	Costco Christchurch
Applicant name	Costco Warehouse New Zealand Limited and Miles Premises Limited
Application number	FTAA-2608-1281
Project summary details	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 will involve activities such as: • Establishment of a new Costco Wholesale warehouse retail store, with ancillary tyre centre, food court and retail area, with an approximate gross floor area 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, together with associated signage and 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 Applicant seeks the following approvals through the fast-track approvals process to authorise the project: • Resource consents and change or cancellation of existing resource consent conditions under the Resource Management Act 1991 ('RMA'); and • Wildlife Approval under the Wildlife Act 1953. It is noted that no freshwater fisheries approvals are being sought as part of this proposal.



1 Overview of comments

1.1 Applicant Engagement

- 1.1.1 As the project includes an approval under a specified Act for which the Director-General of Conservation is the administering agency, the Applicant was required to notify DOC and allow 20 working days to respond before lodging the referral application in accordance with section 11.
- 1.1.2 In relation to this application, DOC has had the following engagement with the Applicant:
- The Applicant requested pre-lodgement consultation/notification on 29 July 2026; and
 - Pre-lodgement feedback was provided to the Applicant on 17 August 2026.
- 1.1.3 DOC was notified of the application on 15 September 2026.

1.2 Approvals sought

- 1.2.1 The following approvals for which DOC is the administering agency have been sought in the referral application:
- Wildlife Act 1953
- 1.2.2 The referral application notes that Wildlife Act approvals may be required relating to the potential handling and relocation of lizards. The Applicant has identified that further investigation is required to fully define the extent of approvals required under the Wildlife Act 1953.

1.3 Matters for the Minister to specify (s27)

- 1.3.1 Section 4 of this memorandum identifies specific information that DOC consider necessary to be included in the substantive application.

1.4 Conclusion

- 1.4.1 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, DOC considers that it is likely that with the appropriate design and conditions, effects can be managed to appropriate levels.
- 1.4.2 DOC is not aware of any reason the project should not be referred.

2 Criteria for Minister's decision on referral application

2.1 Matters to be considered

- 2.1.1 Sections 21 and 22 of the Fast-track Approvals Act 2024 ('FTAA') set out matters to be considered by the Minister in determining whether a referral application should be accepted.
- 2.1.2 Comments below are targeted to provisions where DOC has specific interests or information relevant to the Minister's decision.

2.2 Criteria for declining a referral application

2.2.1 Section 21 sets out the criteria for the Minister for declining a referral application. DOC has considered these criteria and provides comments in the table below.

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	Based on the information available, DOC has considered the ineligibility criteria at sections 5(1)(h), (i), (j) and (k), and has not identified any aspect of the Project that would be ineligible based on those criteria.
21(3)(c)	Is there adequate information to inform a decision	With respect to the approvals identified in the referral application for which DOC is the administering agency, DOC considers the information adequate in terms of a referral decision.
21(4)	Are there any other reasons to decline the application?	Based on the information available, DOC has not identified any reason why the Project should be declined.
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	Based on the information available, DOC has not identified any inconsistency with any relevant settlement or other obligation. Relevant Treaty Settlement Acts are: • Ngāi Tahu Claims Settlement Act 1988
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	Based on the information available, DOC has not identified any reason why the Project should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Based on the information available, DOC considers it is likely that adverse effects of the Project can be addressed through appropriate conditions on any substantive approvals.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the applicant's compliance history.
21(5)(g)	Would a substantive application have any competing applications	Based on the information available, DOC has not identified any competing applications in respect of conservation approvals.

2.3 Criteria for accepting a referral application

2.3.1 Section 22 sets out the criteria for the Minister for accepting a referral application. DOC has considered these criteria and has provided comments in the table below.

Section	Criteria	Comments
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	Wildlife Act approvals would generally take approximately three-four months to process, which is not significantly longer than the FTAA process is expected to take. However, there may be benefits for the Applicant in terms of consideration being combined with RMA approvals (rather than being advanced by a separate process) and given the different decision-making framework under the FTAA.
22 1A	Is there a relevant Government Policy Statement?	No.
22(2)(a)(ix)	Will this project address significant environmental issues?	No.
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	Based on the information received, the application is unlikely to be inconsistent with the relevant statutory planning provisions. However, consideration needs to be given to: • Management of any Threatened and At-Risk species that may be found on the site to ensure their persistence.
22(b)	Any other matters the Minister may consider as relevant?	No.

3 Other considerations

3.1.1 Given the lack of specific detail in the referral application, DOC considers it would be highly beneficial for the Applicant to engage further with DOC as it relates to any conservation approvals (as well as conservation matters subject to RMA consideration) prior to making any substantive application. Benefits include ensuring information necessary to support decision-making with respect to conservation approvals is included; supporting the management of any actual and potential adverse effects on the environment; and early identification and resolution of any issues.

UNCLASSIFIED

4 Matters for the Minister to specify (s27)

4.1.1 None identified.

A handwritten signature in blue ink, appearing to read 'L. Kirk'.

Linda Kirk
Fast Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 7 October 2025

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Costco Christchurch – FTAA-2608-1281
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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Commerce Commission		
	I am submitting this comment on behalf of the Grocery Commissioner, Pierre van Heerden.		
*First name	Laura		
*Last name	Furneaux		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Please refer to the attached two-page letter from the Grocery Commissioner for comments on this application.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Laura Furneaux, Manager Grocery Competition

2 October 2026

5 October 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Dear Minister

Comments of the Grocery Commissioner on the Costco Christchurch application, *FTAA-2608-1281*

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on the referral application for Costco Christchurch.

I have been invited to provide comments under section 17(5) of the Act, in my capacity as Grocery Commissioner. My comments focus on whether the application, based on the information provided, is likely to promote grocery competition.

Grocery competition remains limited

The Commerce Commission's 2022 Market Study found that competition in New Zealand's grocery sector was weak due to high market concentration, significant barriers to entry and expansion and limited competitive pressure between major grocery retailers. While reforms introduced since then, including the Grocery Industry Competition Act 2023, have led to some improvements, competition remains limited. Strengthening grocery competition remains important to deliver lower prices, greater choice and more innovation for New Zealand consumers.

Expansion and entry are important

The Commission's Market Study identified the expansion of existing competitors of the major grocery retailers¹ and the entry of new competitors as among the most effective ways to improve grocery competition. This is because new or stronger competitors provide

¹ The major grocery retailers are Foodstuffs South Island (Pak'NSave, New World, Four Square and On the Spot), Foodstuffs North Island (Pak'NSave, New World and Four Square) and Woolworths New Zealand (Woolworths and FreshChoice/SuperValue).

consumers with greater choice while also increasing competitive pressure on the existing major grocery retailers.

Potential competitive impacts of a Costco store in Christchurch

The proposed Costco store in Christchurch would expand Costco's New Zealand presence and introduce a large-format grocery competitor to the South Island, where the grocery market remains highly concentrated (compared to Auckland). A new Costco store will increase consumer choice and strengthen competitive pressure on existing retailers. It could also provide opportunities for local grocery suppliers, including a new channel to potentially access Costco's international network.

Costco's membership-based, bulk-purchasing model differs from that of other retailers in the region and may attract consumers from a wide catchment who seek value-focused grocery offers. To the extent that consumers view Costco as a substitute (or a partial substitute) for their grocery shop, its entry could increase competition and contribute to a less concentrated market in the Canterbury region, over time.

Costco's Auckland store has demonstrated an ability to compete with the major grocery retailers and provide consumers with an alternative grocery retail option. For example, in the year following the opening of Costco in Auckland the market shares of the major grocery retailers fell by four percentage points. This suggests that a Christchurch store could also have a positive effect on competition in the Canterbury grocery market, where the major grocery retailers currently hold 85% of the retail grocery market.

Conclusion

A new Costco store in Christchurch would provide consumers with an additional grocery retail option and would provide opportunities for suppliers, and in my view is likely to deliver positive competition benefits in the Canterbury region.

Thank you for the opportunity to comment.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. van Heerden', with a stylized flourish at the end.

Pierre van Heerden
Grocery Commissioner

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	FTAA-2608-1281 - Costco Christchurch
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	NZ Transport Agency		
*First name	Nicola		
*Last name	Foran		
Postal address			
*Contact phone number		Alternative	
*Email	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application
NZ Transport Agency Waka Kotahi (NZTA) thanks the Minister for the opportunity to comment on the referral application for the Costco Christchurch Project. NZTA has reviewed the transport information provided with the referral application. The proposal would retain and develop the transport framework previously assessed for the subdivision of the site, including a primary signalised access from Memorial Avenue, a secondary left-in/left-out access from Memorial Avenue, the internal collector road network, and the connection through to Avonhead Road. No direct access to State Highway 1 is proposed. At this referral stage, NZTA has not identified any transport matter that would preclude the proposal from being referred to the fast-track approvals process. Our Asset Management and Safety Teams have reviewed the Transport Assessment and identified no particular issues with the referral-stage material, noting that although the previously considered subdivision was capable of appropriately managing effects on the state highway signals, this will need to be demonstrated again within the substantive application based on detailed modelling of the State Highway 1 / Memorial Ave interchange. If the project is referred, NZTA requests that the following matters be incorporated into the substantive application and its detailed transport assessment:

Insert Fast-track logo

- updated traffic generation, traffic assignment and network modelling, including weekday and weekend retail demand;
- assessment of traffic distribution between Memorial Avenue and Avonhead Road, and the performance of key intersections, including the State Highway 1 / Memorial Avenue interchange;
- identification of any mitigation required to maintain appropriate network performance and manage delays, including effects on access to Christchurch International Airport;
- assessment of site access, parking, internal circulation, servicing, loading, walking, cycling, public transport, road safety and construction traffic effects.

Subject to those matters being addressed through the substantive application and transport assessment, NZTA note no in-principle concerns with the Costco Christchurch Project being referred to the fast-track approvals process.

NZTA welcomes the opportunity to provide comments to the applicant as they prepare any substantive application, and if referred, would appreciate the opportunity to provide comments on that substantive application.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Nicola Foran

Date 7 November 2026