

Before the Independent Hearing Panel
Appointed by the Christchurch District Council

Under the Resource Management Act 1991

In the matter of Plan Change 14 (Housing and Business Choice) to the
Christchurch District Plan

Foodstuffs South Island Limited and Foodstuffs (South
Island) Properties Limited

Submitter 705

Statement of Evidence of Rebecca Jayne Parish

20 September 2023

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Introduction

- 1 My name is Rebecca Jayne Parish.
- 2 I am the Head of Property Strategy for Foodstuffs (South Island) Properties Limited (**Foodstuffs**). Foodstuffs has submitted on Plan Change 14 (Housing and Business Choice, **PC14**) to the Christchurch District Plan (**CDP**). I confirm that I am authorised to give evidence on behalf of Foodstuffs.
- 3 I have approximately 24 years' experience as a resource management, project management, project consenting and property development strategy specialist. I have been employed by Foodstuffs for 20 years. I have a Post-Graduate Diploma in Resource Studies, Bachelor of Resource Studies, Diploma in Business Management and a Diploma in Human Resource Management. I am a Chartered Secretary and a Fellow of Governance New Zealand. I am also a Justice of the Peace for New Zealand.
- 4 I have extensive experience in the property investment, development and supermarket industry, particularly in the South Island. My role at Foodstuffs includes being responsible for all aspects of planning, consenting and land development matters for Foodstuffs South Island.

Background

- 5 Supermarkets provide an essential community service for 362 days per year. They have remained open and able to meet the needs of New Zealanders throughout the COVID-19 alert levels. Customers at times shop twice daily, daily, or several times a week. It is important to our business that our stores are accessible, welcoming and inviting, and are the right size for the residential catchment. We have found that our supermarkets are not just a grocery store but also are something of a community hub and a meeting point for local people, particularly the elderly. Supermarkets also provide positive economic contributions to communities, by providing employment opportunities for locals.
- 6 Foodstuffs supports housing intensification - neighbours are our customers. However, sufficient development capacity must also be provided for business. PC14 will enable more people to live in and around existing supermarkets and the size of those supermarkets will need to be reconsidered based on changes to the residential catchments.
- 7 The size of the supermarket is dependent on various factors including type of store, catchment size, shape of site, and relationship between

retail trading areas and back of house operations. If the store is too small, it is likely to either not be popular because it is not large enough to cater for a variety of brands; or it will overtrade for the size of the store.

- 8 The consequences of overtrading are that there are hold-ups and logistical issues with staffing, restocking and storage. In addition, overtrading can result in inconvenience for customers. In the longer term, this is not good for Foodstuffs' brand image and ultimately results in a drop-off of customer service. Overtrading will eventually get to a point where customers become frustrated by the negative effects attributed to overtrading, which ultimately compromises customer needs. Customers will then look for alternatives.
- 9 Supermarkets located in commercial centres are designed to fit functionally within these (often) scarce high value land resource. Efficient and effective use of that commercial space is necessary. Increasingly supermarkets are situated within suburban neighbourhoods and surrounded by residential dwellings. Foodstuffs puts a huge amount of effort into integrating supermarkets into the residential environment and ensuring appropriate amenity effects.

Site specific matters

- 10 Existing supermarkets around Christchurch have developed over time and have been subject to resource consented changes. The result is that there are some anomalies which would benefit from rezoning through the PC14 process. Foodstuffs seeks to tidy up site specific changes to zoning, planning maps and centres with respect to its operations to better reflect the current, or soon to be, use. These sites were mapped in Foodstuffs' submission and supported by the Officer's Report (on their merits, subject to legal scope)¹:
 - (a) New World Stanmore - 304 Stanmore Road to Local Centre Zone;
 - (b) New World Addington – 92 Lincoln Road to Local Centre Zone;
 - (c) Pak'nSave Wainoni – the established accessways on Breezes Road to also be zoned to Local Centre Zone;

¹ Officer's Report at 8.6.

(d) Foodstuffs Head Office - 159 Main North Road² (Head Office) from High Density Residential Zone to Industrial General Zone as decided in Plan Change 5 (but omitted by PC14).

11 Foodstuffs also recognises the need to provide for growth well ahead of time, particularly given the long lead times associated with planning for, designing, constructing and commencing operations of a proposed expansion. Foodstuffs also seeks a small extension to two zones (i.e. one adjoining Foodstuffs owned residential property for each of the PAK'nSAVE Papanui and New World Ilam stores).

PAK'nSAVE Papanui

12 Foodstuffs seeks to rezone the PAK'nSAVE Papanui³ to a Local Centre Zone to reflect its consented use. The PAK'nSAVE is currently under construction and will be completed by February 2024. The rezoning reflects resource consents granted for the supermarket, addressed in the evidence of Mr Allan.

13 In addition, Foodstuffs purchased 9 Northcote Road which adjoins the consented supermarket, and existing Commercial Local zone to use for additional carparking. This property has had the active use for the last 18 months as a temporary carpark and office area for construction staff. The property has no residential attributes. The property adjoins the Commercial Local zone where the existing retail units of Mad Butchers and Fresh Harvest were demolished to make way for the PAK'nSAVE carparking. A short-term lease remains for the area occupied by Oil Changers (automotive workshop). The Oil Changers building is also to be demolished as part of the resource consents.

14 Foodstuffs will seek to construct formalised carparking on 9 Northcote Road as soon as building consent for civil works is obtained. Construction would take no longer than two months. Foodstuffs does not intend to reconstruct any retail units on the rezoned site, the residual areas are necessary for EV and car parking.

15 Foodstuffs would be comfortable to accept a restriction of use for a supermarket and associated activities. However the evidence of Mr Allan is that it is not considered necessary from a planning perspective.

² Legal description: Lot 2 DP 14400 (159 Main North Rd), part of Lot 1 DP 14400 and accessway on Lot 7 DP14400

³ 165 and 171 Main North Road and 3, 5, 7 and 9 Northcote Rd; Lot 5 DP3753, Lot 1 DP76152 and Part Lot 1 DP 21207.

New World Ilam

- 16 Foodstuffs has also identified a need for additional parking for New World Ilam. There is a part of the New World Ilam site that remains a residential zone which can provide for this carparking. After being approached by neighbours at 55 Peer Street to buy their property, Foodstuffs purchased this property and intends to incorporate it within the New World Ilam operation. 55 Peer Street has a vacant rear section and a small residential dwelling to the front. Foodstuffs would seek to remove the dwelling and construct the carpark. The proposal including all building consents for civil works would take no longer than 8 months for Council to grant a building consent and for works to be completed on site.
- 17 Foodstuffs has not applied for resource consent nor does it intent to use the area of New World Ilam site which includes the shared driveway at the south of New World Ilam (serving 47A, B, D and E Peer Street). We have considered the legal option of surrendering the right of way for vehicle access however this would result in a costly and difficult process requiring consent from multiple landowners. This driveway is fenced off from the supermarket activity and Foodstuffs now supports this section being retained as a residential zoning as proposed in PC14 (and not commercial as requested in its submission) as an appropriate solution to ensure that it is not incorporated into the supermarket activity in future.
- 18 As above, Foodstuffs would be comfortable to accept a restriction of use for a supermarket and associated activities. However, the evidence of Mr Allan is that it is not considered necessary from a planning perspective.

Stanmore Road tree

- 19 Foodstuffs opposes the continued inclusion of the Weeping Elm (*Ulmus glabra Horizontalis*) at its New World Stanmore (300 Stanmore Road) as a protected tree.
- 20 By way of background, the Council wrote to Foodstuffs in 2015 to advise that this tree was not proposed to be listed in the Schedule of Individual Trees (at that time) for the Proposed Christchurch District Plan which was being considered by an Independent Hearings Panel. Foodstuffs supported this position due to:
 - (a) The tree was found to be in a state of decline by a 2012 arboriculture report by Tree Tech, which was supported by the Council's own tree evaluation assessment (16 December 2014);

- (b) The Council report found the tree had apical dieback present and a thinning canopy, along with evidence of branch removal/reduction to the north and east of the canopy;
 - (c) Both of the specialist assessments were undertaken by appropriately qualified and experienced consultant arborists to determine tree health and structural integrity, assess the contribution to landscape and environmental/ecological values, record any exceptionally significant landscape, heritage and botanical values, and record the presence of nuisance (including safety nuisance).
- 21 Foodstuffs did not attend the mediation session for the Proposed Christchurch District Plan process at which a submitter present (Christchurch Civic Trust) reached agreement with the Council on amendments to the methodology for the selection of significant trees; an agreement that added approximately 800 trees to the scheduled tree list (including the tree at 300 Stanmore Road). The information supporting my comments can be found publicly available here: <http://chchplan.ihp.govt.nz/wp-content/uploads/2016/07/2-Foodstuffs.pdf>
- 22 Foodstuffs' position has not changed, and it remains strongly opposed to the inclusion of the tree on the grounds of potential risk to public safety and property. This is the appropriate opportunity to remove it.

Thank you for your time, if you wish to ask me any questions I am happy to answer them for you.

Rebecca Jayne Parish

20 September 2023