

BEFORE THE INDEPENDENT HEARINGS PANEL

UNDER the Resource Management Act
1991 and the Canterbury
Earthquake (Christchurch
Replacement District Plan)
Order 2014

AND

IN THE MATTER of the Proposed Christchurch
Replacement District Plan –
Residential Chapter

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

**(Submitter 705 and Further
Submitter 1324)**

**BRIEF OF EVIDENCE OF
DANIEL IAN THORNE**

20 MARCH 2015

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1. INTRODUCTION

- 1.1 My name is Daniel Ian Thorne.
- 1.2 I am currently employed as a Senior Planner with Aurecon, an international engineering, surveying and planning consultancy. I hold a Bachelor's Degree in Environmental Management and a Post Graduate Diploma in Resource Studies (Distinction) from Lincoln University. I am an Associate Member of the New Zealand Planning Institute, and have over eight years' experience in the resource management field.
- 1.3 I have prepared consent applications and plan change requests for a variety of activities across the South Island and regularly give expert planning evidence in respect of the same. The majority of my experience has been in the fields of urban development and telecommunications. I have more recently been involved with the rezoning of land for residential and business activities in Greater Christchurch, as well as the preparation of consent applications for large scale residential, commercial and industrial developments.
- 1.4 I have provided resource management advice and services to Foodstuffs South Island Limited and Foodstuffs (South Island) Properties Limited ('Foodstuffs') since 2008, with project experience involving the consenting and rezoning of land for the development of several supermarkets, food warehouses, associated car parking and a distribution centre.
- 1.5 In preparing this evidence I have reviewed:
- The Proposed Christchurch Replacement District Plan as notified (**pCRDP**);
 - The submission (705) and further submission (1324) of Foodstuffs;
 - The evidence prepared and circulated by Council's planning expert Mr Blair, particularly in respect to his comments regarding the site specific submission matters.
- 1.6 In preparing my evidence I have read and agree to comply with Code of Conduct for Expert Witnesses (Environment Court Practice Note 2014). This evidence is within my area of expertise except where I

state that I am relying on facts or information provided by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

2. SCOPE OF EVIDENCE

2.1 Foodstuffs' interest in the Residential Proposal of the pCRDP is generally confined to ensuring that the zoning introduced by the pCRDP appropriately recognises and continues to provide for Foodstuffs' existing operations and ownership arrangements (i.e. through a commercial zoning, and not a residential zoning).

2.2 My evidence addresses the following matters:

- (a) a summary of Foodstuffs' site specific submission matters relevant to the Residential Proposal of the pCRDP;
- (b) consideration of the evidence Mr Blair for the Christchurch City Council (the **Council**);
- (c) conclusion based on my assessment of the submissions and the evidence of Mr Blair.

3. EXECUTIVE SUMMARY

3.1 The pCRDP has identified residential zoning for several sites that are currently owned and operated by Foodstuffs, and used for supermarket operations and associated car parking. The instances in which this has occurred is restricted to specific parcels of land at the following sites; Stanmore New World, St Martins New World, Redcliffs New World, Ilam New World, and Wainoni PAK'nSAVE. Foodstuffs lodged submissions on the parts of those sites zoned residential, seeking they be rezoned for commercial purposes.

3.2 I consider that the rezoning of these sites to a commercial zoning will better reflect the existing land use and ownership arrangements of each site. These sites are not being used for residential activities, and are unlikely to be used for residential activities in the foreseeable future. Further, the rezoning of the sites in question will ensure a

legible and consistent zoning which supports the status of each site as a neighbourhood centre.

- 3.3 I agree with Mr Blair in respect of his comments relating to the supermarket sites at Stanmore, St Martins, Redcliffs and Ilam in which he identifies that he has no concerns from a residential perspective if these sites were to be zoned for commercial purposes. While Mr Blair has not made comment on the Wainoni PAK'nSAVE site I consider that given the previous and consented land use on this site (access purposes), the most appropriate zoning is the same as that for the wider Wainoni PAK'nSAVE site, being Commercial Core.
- 3.4 These matters will be addressed in evidence at the hearing of submissions on the Commercial Proposal of the pCRDP.

4. FOODSTUFFS – SUMMARY OF ZONE CHANGES SOUGHT

- 4.1 Foodstuffs' through its submission is seeking to ensure that the zoning introduced by the pCRDP appropriately recognises and continues to provide for their existing supermarket operations and ownership arrangements.
- 4.2 The pCRDP as notified identified residential zoning over the existing supermarket operations in several locations, and my evidence therefore focuses on those sites impacted, which are as follows:
- (a) Stanmore New World (9, 11 and 13 Warwick Street);
 - (b) St Martins New World (21, 23 Beckford Road and 22 Wades Avenue);
 - (c) Redcliffs New World (196 and 198 Main Road);
 - (d) Ilam New World (47C Peer Street); and
 - (e) Wainoni PAK'nSAVE (186 Breezes Road).

- 4.3 With respect to the abovementioned sites I note the following:

Stanmore New World

- 4.4 The Stanmore New World site occupies a square block of land at the corner of Stanmore Road and Warwick Street. The pCRDP identified a portion of the site as Residential Medium Density (9, 11 and 13

Warwick Street), while the remainder of the site was zoned Commercial Core.

- 4.5 The properties located at 9, 11 and 13 Warwick Street are presently occupied by car parking and access associated with the supermarket operations on site. These properties therefore represent an integral component of the consented supermarket activities at the Stanmore New World site, and cannot be separated from the same. I therefore consider the properties at 9, 11 and 13 Warwick Street should be zoned Commercial Core.

St Martins New World

- 4.6 In 2012 Foodstuffs successfully rezoned the properties at 22 Wades Avenue and 21A-23 Beckford Road to a Business 2P Zoning (Plan Change 59), with this zoning providing for car parking in association with the rebuilt St Martins New World located at the corner of Wilsons Road, Wades Avenue and Beckford Road. The pCRDP has identified the properties at 22 Wades Avenue and 21A-23 Beckford Road as Residential Suburban, while the rest of the St Martins New World site is zoned as Commercial Core.
- 4.7 As provided for by Plan Change 59 and the subsequent resource consent (RMA92019514, granted 4 April 2012), car parking and extensive landscaping has been established over 22 Wades Avenue and 21A-23 Beckford Road, with this car parking operating as an integral part of the existing supermarket operations at the St Martins New World site. Recognising that this car park activity cannot be separated from the supermarket operations on site, I consider that the properties at 22 Wades Avenue and 21A-23 Beckford Road should be zoned Commercial Core consistent with the zoning of the wider St Martins New World site.

Redcliffs New World

- 4.8 Foodstuffs are currently in the process of rebuilding the earthquake damaged Redcliffs New World (RMA92021137, granted 6 March 2012), and have recently purchased the adjacent properties adjoining the southeast boundary of the site (196 and 198 Main Road).
- 4.9 The pCRDP identified the zoning of 196 and 198 Main Road as Residential Suburban, while the remainder of the Foodstuffs Redcliffs

property has been zoned Commercial Core. The properties located at 196 and 198 Main Road were 'red-stickered', demolished, and are now utilised by the construction team rebuilding the supermarket. These properties are not used for residential activities, and will not be used for residential activities in the foreseeable future. Rather, they provide an opportunity to support the future operations of the Redcliffs New World and subsequently serve to enhance the neighbourhood centre status of the site. To this end, I consider that given their location and ownership, the properties at 196 and 198 Main Road should be zoned Commercial Core consistent with the zoning of the remainder of the Redcliffs property.

Ilam New World

- 4.10 The pCRDP identified a portion of the Ilam New World site as Residential Suburban (47C Peer Street), while the remainder of the site was zoned Commercial Local under the pCRDP. The site at 47C Peer Street previously operated as a parking area serving the former Feltex operation on the wider site, and now continues to provide parking albeit in association with the consented supermarket operations on the site.
- 4.11 The car parking at 47C Peer Street is an essential component of the supermarket operations on site, and forms part of the resource consent (RMA92014949, granted 2 June 2010) which authorised the supermarket development on the site. I consider that as this car parking cannot be separated from the consented supermarket activity, the site at 47C Peer Street should be zoned Commercial consistent with the zoning of the wider Ilam New World site.

Wainoni PAK'nSAVE

- 4.12 Foodstuffs are currently in the process of replacing the Wainoni PAK'nSAVE (RMA92020670, granted 20 December 2012), and have obtained resource consent to provide pedestrian and vehicle access to the site from 186 Breezes Road (RMA92024173, granted 20 February 2014). The pCRDP has identified the access leg portion of 186 Breezes Road as Residential Suburban, while the wider Wainoni PAK'nSAVE operations on the site are zoned Commercial Core.

- 4.13 The site at 186 Breezes Road was previously utilised as access to the Rabco Industries site (which occupied the rear site until purchased by Foodstuffs), and will continue to operate as an access leg albeit this will be serving the replacement Wainoni PAK'nSAVE. I consider that the accessway to Breezes Road represents a critical element of the consented supermarket operations on the site, and therefore should be zoned the same as that for the rest of the Wainoni PAK'nSAVE site (i.e. Commercial Core).

5. COUNCIL EVIDENCE

- 5.1 Mr Blair has considered and expressed his opinion on the rezoning of the above sites with the exception of the Wainoni PAK'nSAVE site. I note his conclusions with respect to each of the sites considered are as follows:

- (a) *I have no concern from a residential perspective if these properties were to be zoned for commercial purposes (Stanmore New World – Paragraph 15.23)*
- (b) *I have no concern from a residential perspective if these properties were to be zoned for commercial purposes (St Martins New World – Paragraph 15.24)*
- (c) *I have no concern from a residential perspective if these properties were to be zoned commercial purposes (Redcliffs New World – Paragraph 15.22)*
- (d) *It is currently vacant but was part of the car-parking for the New World. On that basis, the adjoining residential [sic] can reasonably expect similar activities to occur when the supermarket is rebuilt. In my view a change in zone could be supported from a residential perspective (Ilam New World – Paragraph 15.40).*

- 5.2 I concur with Mr Blair in that the rezoning of the abovementioned sites does not give rise to any concerns from a residential perspective. Further, I consider that the rezoning of these sites simply serves to better reflect the existing and consented commercial operations. I also accept and agree with Mr Blair that these matters need to be

addressed at the hearing of submissions on the Commercial Proposal of the pCRDP.

- 5.3 With respect to Mr Blair's comments in respect of Ilam New World, I wish to clarify that the site at 47C Peer Street is not vacant as suggested by Mr Blair, but rather the car parking on the site has already been established, as has the supermarket. With this in mind, I also wish to clarify the calculations in Table 1 of Mr Blair's evidence which appear to incorrectly inflate the areas of land which Foodstuffs have sought to be rezoned. In particular, it appears that Mr Blair has taken into account the entire area of Redcliffs New World, St Martins New World and Ilam New World, and not just the specific area of land that is sought to be rezoned within these centres. The correct areas of land which Foodstuffs have sought to be rezoned in these locations are approximately 1,200m² at Redcliffs (not 0.4ha), 2,950m² at St Martins (not 1.56ha), and 1,700m² at Ilam (not 4.27ha).
- 5.4 While Mr Blair has not provided comment on the Wainoni PAK'nSAVE site within his evidence, I have informally discussed this matter with Mr Blair who advised that he was unlikely to have any concerns, however would review this site further. Recognising that the access from the Wainoni PAK'nSAVE to Breezes Road was recently considered at length and subsequently authorised by way of resource consent, I consider that the rezoning of the access leg to Commercial Core would not give rise to any concerns from a residential perspective.

6. CONCLUSION

- 6.1 The pCRDP has identified residential zoning for several sites that are currently owned and operated by Foodstuffs for supermarket operations and associated car parking.
- 6.2 I consider that the rezoning of these sites to a commercial zoning will better reflect the existing, consented and future anticipated land use, and ownership arrangements of each site. These sites are not being used for residential activities, and are unlikely to be used for residential activities in the foreseeable future. Further, the rezoning of the sites in question will ensure a legible and consistent zoning which supports the status of each site as a neighbourhood centre.

6.3 These matters will be addressed in evidence at the hearing of submissions on the Commercial proposal of the pCRDP.



Daniel Ian Thorne

19 March 2015