



Order Paper For The Meeting Of The

PLAN CHANGE HEARING

Independent Commissioners D Whitney (Chair), D Mead and S Stevens

**10.30am on Tuesday 5th June and Wednesday 6th June 2018
at Edgewater Resort, Sargood Drive, Wanaka**

NORTHLAKE INVESTMENTS LTD

Council Reference PC53

Submitter's Pre-Circulated Expert Evidence

QUEENSTOWN LAKES DISTRICT COUNCIL
RESOURCE CONSENT HEARING

Carey Vivian (Planner for Submitters # 6 &7)	1
Michael Copeland (Economist for Submitters # 6 & 7)	19

SUBMITTER'S # 6 & 7 PLANNING EVIDENCE

QUEENSTOWN-LAKES DISTRICT COUNCIL
PLAN CHANGE 53 HEARING

IN THE MATTER

of a hearing on submissions on Plan Change 53 to the
Operative Queenstown-Lakes District Plan pursuant
to clause 8B of the First Schedule to the Resource
Management Act 1991

Willowridge Developments Limited

Submitter (#6)

Central Land Holdings Limited

Submitter (#7)

EVIDENCE OF CAREY VIVIAN

(PLANNER)

24 May 2018

Executive Summary

1. The proposed amendments to Zone Standard (viii) Retail will not give effect to Policies 1.7 and 2.6. It is therefore inappropriate to amend the Zone Standard (viii) Retail without amendment to Policies 1.7 and 2.6.
2. There is no jurisdiction to amend Policies 1.7 and 2.6, so the proposed change to Zone Standard (viii) Retail should not proceed as proposed.
3. Inconsistent objective/policies and rules/standards is poor planning practice and leads to inappropriate outcomes (especially where a breach of standard becomes a non-complying activity, such that the activity's consistency with the objectives and policies is of real importance in any assessment).
4. An amendment to Zone Standard (viii) Retail to enable a grocery store that does not exceed 300m² (GFA) is consistent with Policies 1.7 and 2.6 and therefore appropriate.

1. Introduction

- 1.1 My name is Carey Vivian. I hold the qualification of Bachelor of Resource and Environmental Planning (Hons) from Massey University. I have been a full member of the New Zealand Planning Institute since 2000. I am a director of Vivian and Espie Limited, a resource management, urban design and landscape planning consultancy based in Queenstown. I have been practicing as a resource management planner for twenty-three years, having held previous positions with Davie Lovell-Smith in Christchurch; and the Queenstown Lakes District Council (QLDC or the Council), Civic Corporation Limited, Clark Fortune McDonald and Associates and Woodlot Properties Limited in Queenstown.
- 1.2 I have read the Code of Conduct for Expert Witnesses contained within the Environment Court Practice Note 2014 and agree to comply with it. This evidence is within my area of expertise, except where I state that I am relying on information I have been given by another person. I confirm that I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed herein.

2. Submissions

- 2.1 This evidence is a joint brief on behalf of Willowridge Developments Limited (WDL) and Central Land Holdings Limited (CLHL).
- 2.2 WDL have submitted in opposition to the proposed increasing the retail floor area from 1,000m² to 2,500m²

and have also opposed the proposal to enable a single retail activity of 1,250m². WDL are the owner of the Three Parks Zone (TPZ) in Wanaka.

- 2.3 WDL submission states that the application understates the available retail floorspace at Three Parks because, subject to a town center health check, Three Parks can develop in excess of 30,000m² of retail floor space, with a 'deferred' zone available to meet future growth if required.
- 2.4 I confirm that Rule 12.26.7.2 Ref 6 permits retail activities to 10,000m² GFA¹ in the Commercial Core Sub-Zone of the Three Parks Zone.² Retail activities in excess of 10,000m² GFA is a Non-Complying Activity³ unless it is approved as part of an Outline Development Plan or Comprehensive Development Plan⁴ as a Restricted Discretionary Activity. I also note that following development of the Commercial Core Sub-Zone, the Deferred Commercial Core Subzone provisions apply which provide for an area which can be rezoned for commercial development in the future once the existing Commercial Core Subzone within the Three Parks Zone has been largely developed and there is a clear need for more land to be released. In the interim, this area is able to be farmed or used as open space and outdoor recreation.⁵
- 2.5 WDL's submission also notes that since the PC53 application was prepared, an application has been lodged by Foodstuffs South Island Limited for a 4,353m² supermarket within the Commercial Core Subzone. WDL notes the activity is permitted, but the building requires resource consent. That is also my understanding of how the Three Parks Zone works.
- 2.6 CLHL have submitted in opposition to the same retail floor space increases. CLHL owns land at Anderson Heights and has submitted that PC53 does not take due consideration of the potential for retail activity at Anderson Heights and the effect this will have on the retail demand for Northlake. CLHL's submission states that the Anderson Heights land has been rezoned Business Mixed Use Zone (BMUZ) under the Proposed District Plan (PDP)⁶ which enables retail activity as a permitted activity (despite buildings requiring discretionary activity consent).
- 2.7 I confirm under the Rule 16.4.1⁷ of the BMUZ (decisions version of the PDP) any activity which is not listed in Table 16.4 and complies with all the relevant standards is a permitted activity. Commercial Activities are not listed in Table 16.4, therefore are a permitted activity pursuant to Rule 16.4.1 provided all relevant standards are met. No standards restrict commercial activities. My interpretation is supported by provision

¹ Page 12-246 of the ODP.

² Page 12-244 of the ODP.

³ Standard 9, Page 12-251 of the ODP.

⁴ Rule 7 and 9, Page 12-246 and 12-247.

⁵ Page 12-266 of the ODP.

⁶ PDP Planning Map 20 and 21.

⁷ Page 16-6 of the PDP (decisions version).

16.1 Purpose of the BMUZ which states:

The intention of this zone is to provide for complementary commercial, business, retail and residential uses that supplement the activities and services provided by town centres. Higher density living opportunities close to employment and recreational activities are also enabled. ...⁸

- 2.8 The BMUZ at Anderson Heights is 8.2 hectares in area and Standard 16.5.4⁹ permits a building coverage of 75% within the BMUZ. This equates to a building coverage of 61,500m² GFA in the Anderson Heights BMUZ. All of this permitted 61,500m² GFA could be used for retail or commercial activities as a permitted activity under the BMUZ provisions. While I acknowledge that this area is already highly developed, it is not unusual for businesses to move from one area to another creating opportunity for other retail activities to establish in their place.¹⁰ The relocation of some large retail activities from Anderson Heights BMUZ to Three Parks Zone could create opportunity at Anderson Heights BMUZ for alternative large format retail activities such as a supermarket.
- 2.9 CLHL submission considers that the BMUZ at Anderson Heights will create sufficient retail land to service Northlake area and therefore there is no need for additional retail floorspace at Northlake. CLHL submits that PC53 fails to take this availability of land into consideration when considering retail floorspace requirements of Wanaka.
- 2.10 In preparing this evidence I am mindful of section 74(3) and the provisions in the First Schedule to the RMA to the effect that trade competition, or the effects of trade competition cannot be taken into account. Mr Matheson has addressed this issue in his legal submissions and I rely on his legal opinion in respect of this matter. Mr Copeland has also provided his opinion as to the potential impacts of the additional retail provision at NSZ and I also rely on that for the purposes of this evidence (refer to paragraph 3.29 below).

3. Discussion

- 3.1 I understand the Northlake Special Zone (NSZ) was inserted into the Operative District Plan (ODP) by way of Plan Change 45 (PC45). PC45 sought to rezone 219.26 hectares of land at Wanaka from Rural General Zone and Rural Residential Zone to the NSZ. The PC45 section 32 evaluation, prepared by John Edmonds and Associates (JEA), noted that the plan change provided for primarily residential development "*plus a neighborhood commercial component*". The limited nature of retail activities within the zone was promoted and approved through a series of provisions designed to restrict the nature and scale of retail activities within

⁸ Page 16-2 of the PDP (decisions version).

⁹ Page 16-9 of the PDP (decisions version).

¹⁰ As is evidenced by the relocation of The Warehouse from Remarkables Park Shopping Centre to Five Mile Shopping Centre in Queenstown.

the zone. This includes the following provisions:

12.33.1 Issues

...

ii Community

*Development in Northlake shall occur in a manner that provides for the integration of activities important for the social wellbeing of the community. There is potential to establish a small precinct with community and commercial activities that meet some daily needs and act as a focal point for the Northlake community.*¹¹

12.33.2 Objectives and Policies

Objective 1 – Residential Development

A range of medium to low density and larger lot residential development in close proximity to the wider Wanaka amenities

...

1.7 *To provide for small scale neighbourhood retail and commercial activities to serve the needs of the local community.*¹²

Objective 2 – Urban Design

Development demonstrates best practice in urban design and results in a range of high quality residential environments.

...

2.6 *To enable visitor accommodation, commercial, retail and community activities and retirement villages within Activity Area D1 including limited areas of small scale neighbourhood retail to service some daily needs of the local community, while maintaining compatibility with residential amenity and avoiding retail development of a scale that would undermine the Wanaka Town Centre and the commercial core of the Three Parks Special Zone.*¹³

12.34.2.5 Non-Complying Activities

ix. *Visitor Accommodation, Commercial, Retail and Community Activities and Retirement Villages within Activity Areas A, B1 to B5 and C1 to C4.*¹⁴

Zone Standard viii. Retail

(a) *No retail activity shall have a gross floor area exceeding 200m².*

(b) *The total amount of retail floor area within the Zone shall not exceed 1000m².*¹⁵

3.2 Part 5.3 of JEA's evaluation on PC45 found that Policy 1.7 "*recognises that the size of the zone may warrant some limited neighborhood commercial amenities for local residents (such as a corner dairy).*"¹⁶

3.3 A decision on PC45 was released in June 2014. The Hearings Commission were satisfied, following consideration of the evidence presented at the hearing, that it is appropriate to make provision for a *neighbourhood retail area* in the context of Activity Area D1. The decision stated:

"It is envisaged that such retail area will primarily serve the land subject to PC 45 albeit that this amenity may also be utilised by those that live in the immediate vicinity. The Commission accepts Mr Long's evidence to the effect that providing for a neighbourhood retail area at Northlake will not have an adverse effect on the Wanaka Town Centre, the commercial precinct at the Three Parks Special Zone, the retail activity conducted at Anderson Heights and the small retail centre at Albert Town.

¹¹ Page 12-358 of the ODP.

¹² Pages 12-358 and 359 of the ODP.

¹³ Page 12-359 of the ODP.

¹⁴ Page 12-365 of the ODP.

¹⁵ Page 12-373 of the ODP.

¹⁶ Page 32 of the Section 32 evaluation for PC45.

The Commission also notes in this context that the precise location of the neighbourhood retail area cannot be determined at this time. Accordingly it would not be appropriate to apply the Corner Shopping Centre Zone that is provided for in the DP.

The rules of PC 45 will restrict the scale of the neighbourhood retail area to no greater than 1000m²; and no retail activity shall have a gross floor area exceeding 200m². The Commission is satisfied that the relevant Zone Standard should explicitly state that any such retail activity shall occur only within Activity Area D1; and that Visitor Accommodation, Commercial, Retail and Community Activities and Retirement Villages should be a noncomplying activity in Activity Areas A, B1-B5 and C1-C5 given the potential effects of such activities on residential amenity values.”¹⁷

3.4 PC53 seeks to increase the retail floor space of the NSZ by 150%. The reason for this increase is given in the PC53 Section 32 is to *“enable a small supermarket to be established within the NSZ that can provide local residents with a local grocery shopping alternative.”*¹⁸

3.5 Despite increasing the retail floorspace by 150%, PC53 does not seek to change Objectives 1 or 2 or policies 1.7 or 2.6 (as quoted above) in any way.

3.6 The JEA section 32 evaluation states with respect to Objective 1:

- (i) That the provision of a small supermarket and additional retail floor space remains consistent with the relevant policy (i.e. Policy 1.7);
- (ii) The 1,250m² supermarket and the remainder of the 1,250m² of other retail floorspace (at no more than 200m² tenancies) remains as “small scale” to serve the local community needs.
- (iii) The objective and policy can remain unchanged and still be relevant and consistent.¹⁹

3.7 With respect to Objective 2, the JE&A section 32 evaluation states:

Enabling additional retail floor space will ensure that residents within the Northlake community can improve access and convenience for daily shopping needs; avoiding unnecessary vehicle trips.”²⁰

3.8 The JE&A section 32 evaluation concludes that Objective 1 (and associated policies) and Objective 2 can remain without change – and is the most appropriate way of achieving the purpose of the Act.

3.9 In paragraph 9.43, Mr Barr states that Policy 1.7 needs to be amended because the scale of the activity at Northlake would mean it serves more than the local community. I agree with Mr Barr but note that there is no jurisdiction to change Policy 1.7 under PC53. I discuss this jurisdictional issue elsewhere in my evidence.

¹⁷ Page 59 of the Council decision on PC45.

¹⁸ Page 6 of the Section 32 evaluation for PC53.

¹⁹ Page 25 of the Section 32 Evaluation for PC53.

²⁰ Page 26 of the Section 32 Evaluation for PC53.

- 3.10 In paragraph 9.46 Mr Barr recommends that if PC53 is to be accepted then Policy 2.6 be amended to reflect the scale of activities that would occur in the D1, and that parameters are placed on the development in the D1 to ensure the activities are limited in type and scale.
- 3.11 Appendix 1a to Mr Barr's report contains a set of revised objectives and policies. Mr Barr recommends the deletion of Objective 1 and Policy 1.7 and Objective 2 and Policy 2.6 and the insertion of a new Objective 7 and policies as follows:

Objective 7 – Non-Residential Activities

A range of activities that meet the day to day needs of the community at a limited scale that supplements the function of the Wanaka Town Centre and Three Parks Commercial Core.

Policies

- 7.1 Provide for a diverse range of activities within Activity Area D1 to meet the needs of the community, enable local employment opportunities and assist with enabling economic viability.
- 7.2 Avoid visitor accommodation, commercial, retail and community activities and retirement villages within Activity Areas other than within Activity Area D1.
- 7.3 Except as provided for in Policy 7.4, avoid individual retail and commercial activities exceeding 200m² gross floor area that would adversely affect the:
- a. retention and establishment of a mix of activities within Activity Area D1;
 - b. role and function of the Wanaka Town Centre and the Three Parks commercial zones that provide for large scale retailing; and
 - c. safe and efficient operation of the transport network.
- 7.4 Provide for a single supermarket/food retail activity with a gross floor area limited to 1,250m² to ensure that the commercial function of Wanaka Town Centre and Three Parks is not adversely affected.²¹

- 3.12 The JEA Section 32 Evaluation found there was no need to amend Objective 1 or 2 (and associated policies) as they are the most appropriate way of achieving the purpose of the Act. For that reason, PC53 did not propose any changes to the operative provisions. As a result, the community did not have an opportunity to submit on any changes to Objective 1 and 2, as any submissions would have likely been considered as not being on PC53. Clause 10 on the First Schedule of the RMA is very clear that the local authority must only give a decision on the provisions and matters raised in submissions. To do otherwise, as recommended by Mr Barr, is beyond jurisdiction. Mr Matheson's legal submissions have also addressed the issue of jurisdiction.
- 3.13 While I agree that Mr Barr's suggested changes are an improvement of the existing situation, PC53 is not, in my opinion, the legal means to achieve those changes. PC53 must be assessed against Objectives 1 and 2 as contained in the ODP, not Objective 7 recommended by Mr Barr.
- 3.14 Accordingly, in my opinion, the Commission should give little (if any) weight to Mr Barr's recommendation in considering whether or not Zone Standard (viii) Retail should be amended as sought by PC53. Instead the Commission should focus on those aspects of Mr Barr's report which correctly address the operative

²¹ Page 47 and 48 of the S42A report on PC53.

Objective 1 and 2 policies. I have highlighted these aspects below:

- (a) In paragraph 9.41 Mr Barr states that Policy 1.7 restricts its ambit to providing for '*small scale neighbourhood retail activities to serve the needs of the local community within Activity Area D1*'. As illustrated in the RCG report, the retail activity sought by the plan change seeks to draw from a much wider catchment than the local community of Northlake itself.²²
- (b) In paragraph 9.45 Mr Barr states Policy 2.6 is directly relevant to the effects of the plan change on other local centres. As such he refers to and relies on Ms Hampson's assessment that a single retail activity of 1,250m² would not undermine the Wanaka Town Centre and Commercial Core of Three Parks, provided the activity is restricted to food retail. Mr Barr states that "*without derogating from this assessment I do not consider the additional retail activities that would be enabled by the plan change implement Policy 2.6, particularly where it states 'including limited areas of small scale neighbourhood retail to service some daily needs of the local community'*".²³

3.15 I conclude from these paragraphs that Mr Barr accepts that the 150% increase sought for retail activities does not achieve Policy 1.7 and 2.6 of the ODP (noting PC53 is not restricted to food retail).

3.16 Zone Standard (viii) Retail Activities of the ODP, as approved by PC45, states:

viii. Retail

- (a) *No retail activity shall occur within the Northlake Special Zone except in Activity Area D1.*
- (b) *No retail activity shall have a gross floor area exceeding 200m².*
- (c) *The total amount of retail floor area within the Northlake Special Zone shall not exceed 1000m².*²⁴

3.17 Non-compliance with this standard is a non-complying activity pursuant to Rule 12.34.2.5 (ix) which states:

*Any activity which is not listed as a Prohibited Activity and which does not comply with one or more of the relevant Zone standards, shall be a Non-Complying Activity.*²⁵

3.18 The combination of Zone Standard (viii) and Rule 12.34.2.5 (ix) places tight control on the scale and amount of retail activity within the NSZ. As stated in the PC43 decision, the reason for this was to ensure the neighbourhood retail area at Northlake will not have an adverse effect on the Wanaka Town Centre, the commercial precinct at the Three Parks Special Zone, the retail activity conducted at Anderson Heights and the small retail centre at Albert Town.²⁶ As a non-complying activity the objectives and policies framework plays an important role in assessing whether any such non-complying consent application is successful.

²² Page 35 of the S42A report on PC53.

²³ Page 36 of the S42A report on PC53.

²⁴ Page 12-373 of the ODP.

²⁵ Page 12-365 of the ODP.

²⁶ Page 59 of the Council decision on PC45.

Accordingly, it is critical to have consistent objectives/policies and rules/standards in district plans. PC53 does not, in my opinion, achieve such consistency.

- 3.19 I note that the JEA section 32 evaluation finds that the 150% increase in retail GFA is consistent with Policies 1.7 and 2.6 and does not seek to amend those policies in any way. Yet when discussing the option of applying for a non-complying resource consent application (as opposed to a Plan Change) the section 32 evaluation states:

Option 1: Status Quo – Maintain current zoning and rely on resource consent processes	
Benefits	<ul style="list-style-type: none"> Allows a full proposal/ application to be assessed.
Costs	<ul style="list-style-type: none"> Inconsistent with the current rule framework. Any application would be publicly notified. Current rules impose a non-complying consent status to exceed the retail footprint. Section 104D threshold for approving a non-complying activity is a high risk. Resource consent process under the current zoning is uncertain and time consuming, and the outcome is uncertain. Potential lost opportunity to provide local community with an improved range of necessary retail and community services. If consent is refused, then potential for increased use of roading network/ travel times and associated network impacts and costs by local residents to access other supermarkets.
Efficiency & Effectiveness	<ul style="list-style-type: none"> The RC process is an inefficient and ineffective process for assessing the suitability of an increased retail floor area in the NSZ.
Risk of acting (or not acting)	<ul style="list-style-type: none"> High risk of consent applications being refused given current rule framework of the District Plan (refer to costs section above).

- 3.20 This assessment implies that the section 104D threshold for approving a non-complying activity is a high risk, and in the last line of the Option1 table reproduced above expressly notes that there is a *“High risk of consent applications being refused given the current rule framework of the District Plan”* (emphasis added). The Commission will be aware that section 104D(1)(b) states that the consent authority may grant resource consent for a non-complying activity if it is satisfied that the application is for an activity that will not be contrary to the relevant objectives and policies of the District Plan(s). The Section 32 Evaluation finds that the proposal to increase retail GFA by 150% is consistent with Policies 1.7 and 2.6 and those policies do not require amendment as a result of enabling a 150% increase in retail GFA. If that is correct, the costs or risks detailed above with respect to the resource consent application are, in my opinion, unfounded. If the relevant plan change is appropriate under the operative objectives and policies then it would be difficult to reach a conclusion under section 104D(1)(b) that a non-complying resource consent application is contrary to the relevant objectives and policies of the District Plan(s). If that is correct, then the resource consent process is not high-risk, inefficient and ineffective as the JEA Section 32 Evaluation suggests. Logically it would pass section 104(1)(b). Instead, in my opinion, it highlights the inconsistency between at increase in 150% retail (GFA) (whether by resource consent application or plan change) and operative Policies 1.7 and 2.6.

- 3.21 The ODP contains two definitions which are relevant to the implementation of Zone Standard (viii) Retail Activities:

RETAIL SALES/RETAIL/ RETAILING

Means the direct sale or hire to the public from any site, and/or the display or offering for sale or hire to the public on any site of goods, merchandise or equipment, but excludes recreational activities.²⁷

GROSS FLOOR AREA

Means the sum of the gross area of the several floors of all buildings on a site, measured from the exterior faces of the exterior walls, or from the centre lines of walls separating two buildings.²⁸

- 3.22 Mr Barr notes at Paragraph 1.2 of his report that a key objective of the plan change is to increase the size of Activity Area D1 to provide opportunities for a supermarket and retirement housing. With respect, in my opinion, PC53 is wider than that. It essentially seeks a 150% increase in retail activities from the site with no limitation on the type or number of retail activities (only the 200m² GFA maximum). While much as been said about a 1,250m² supermarket, the effect of the proposed standard could enable could be something very different (for example 31 x 80m² shops, or a service station or a fast food franchise).

- 3.23 At paragraph 9.31²⁹ Mr Barr states that the expansion to AA D1 calls into question the role and function of commercial and retail zoning within Wanaka, and the potential emergence of Northlake as a more substantial commercial and retail node. Mr Barr states that having considered the ODP and PDP District Wide Objectives and policies, that he considers NSZ should sit along side Local Shopping Centre Zones in the Wanaka area and it is important that the role of D1 is supplementary, and subordinate in terms of overall retail and commercial activity to the Town Centre Zone and the Three Parks Commercial Core. I agree with that assessment, but I disagree with his opinion that from a retail perspective D1 can be extended as sought conditional on the following parameters:

- a. *A single activity of 1,250m² GFA is enabled and this is limited to supermarket/ food retail only;*
- b. *That the overall increase of retail activity to 2,500m² GFA is only enabled if the single 1,250m² GFA supermarket/food retail activity is utilised;*
- c. *Commercial activity (as defined in the ODP definitions and distinct from the ODP definition of Retail Activity) is limited to 1,000m²; and*
- d. *The 200m² cap is retained for all other individual retail and commercial activities.³⁰*

- 3.24 Accordingly, at paragraph 9.35 and 10.46, Mr Barr recommends the following amendments to the PC53 zone standard (viii):

ii. Retail and Commercial Activities

- (a) *No retail activity or commercial activity shall occur within the Northlake Special Zone except in*

²⁷ Page D-11 of the ODP.

²⁸ Page D-5 of the ODP.

²⁹ Page 32 of the Section 42A report on PC53.

³⁰ Page 33 of the Section 42A report on PC53.

Activity Area D1.

Activity Area D1

- (b) No ~~individual~~ retail activity or commercial activity shall have a gross floor area exceeding 200m², except:
 - i. One activity may have a maximum gross floor area of 1,250m² limited to a supermarket/food retail activity.
- (c) The total amount of retail gross floor area ~~within the Northlake Special Zone (excluding a supermarket/food retail activity established pursuant to (b) (i))~~ shall not exceed ~~1000m²~~ 1,250m².
- (d) The total amount of commercial activity gross floor area (excluding retail activities) shall not exceed 1,000m².³¹

3.25 Commercial Activities are defined in the ODP as:

Means the use of land and buildings for the display, offering, provision, sale or hire of goods, equipment or services, and includes shops, postal services, markets, showrooms, restaurants, takeaway food bars, professional, commercial and administrative offices, service stations, motor vehicle sales, the sale of liquor and associated parking areas. Excludes recreational, community and service activities, home occupations, visitor accommodation, registered holiday homes and registered homestays.³²

3.26 Commercial Activities are wider than Retail Activities. They include non-retail activities such as professional and administrative offices. Such activities are not provided for in Zone Standard (viii) of the ODP or as sought to be amended by PC53. However, that does not mean the NSZ is permissive with respect to non-retail commercial activities as Rule 12.34.2.3(ii) requires a restricted discretionary activity consent for commercial activities (which by definition includes retail activities) within the AA D1. Rule 12.34.2.3 retains such status unless that activity provided they comply with all relevant site and zone standards. Mr Barr's recommended zone standard therefore additional to Rule 12.34.2.3(ii).

3.27 I do consider the inclusion of the words *and Commercial Activities* has some merit with respect to Standard (viii), however I do question the jurisdiction to do so through PC53. While the wording of Standard (viii) is clearly subject to PC53, no submission requested such changes. This may be something more appropriate dealt with at the time that the NSZ is inserted into the PDP.

3.28 Mr Copeland has prepared specialist evidence assessing whether there is a need for additional retail space and provision for a 1,250m² supermarket at Northlake and what might be the economic impacts of existing centres of providing for additional retail space and a 1,250m² supermarket with the NSZ. In preparing his evidence Mr Copeland reviewed the reports of RCG Limited, Market Economics Limited and the evidence of Mr Polkinghorne.

3.29 At paragraph 5.6 Mr Copeland concurs with the conclusions reached in the Market Economics report with the exception, in his opinion, that allowing 1,250 m² to be developed in the NSZ will potentially have

³¹ Page 33 and 48 of the Section 42A report on PC53.

³² Page D-3 of the ODP.

significant economic impacts on the existing centers. The five reasons for Mr Copeland's exception are detailed in his paragraph 5.6. I rely on Mr Copeland's expert opinion in this regard.

- 3.30 At paragraph 5.7 Mr Copeland concludes that the establishment of a supermarket at Northlake is unlikely to have a significant economic effect on the Wanaka CBD, ie beyond trade competition effects. Mr Copeland states that reason for this is the town centre in addition to its existing supermarket has a broad range of other retail and commercial activities and the diversion of some supermarket sales will not result in a significant reduction in economic activity within the centre. I rely on Mr Copeland's expert opinion in this regard.
- 3.31 Mr Copeland continues, at paragraph 5.7, that the potential economic effects for the Three Parks and Anderson Heights centers would be significant and go simply beyond trade competition effects. I rely on Mr Copeland's expert opinion in this regard.
- 3.32 Mr Copeland concludes at paragraph 7.3 and 7.4 of his evidence:
- (a) That allowing a supermarket or other LFR activity at Northlake would be inconsistent with meeting just the convenience shopping needs of local residents but would draw customers from a wider catchment; and
 - (b) PC53 has the potential to have significant economic effects on Three Parks and Anderson Heights retail centers.
- 3.33 I rely on Mr Copeland's conclusion in forming my opinion that the proposed changes to Standard (viii) Retail are not supported by the ODP objectives and policies for the LSZ which seek to retain small scale neighbourhood retail and commercial activities to service the daily needs of the local community without undermining the commercial core of the Three Parks Zone.

Proposed District Plan

- 3.34 At paragraphs 13.2 to 13.4³³ Mr Barr considers the McCaulay submission which opposes PC53 on the basis that the change should be included as part of the PDP review. Mr Barr states that this matter is not a recommendation the hearings panel presiding over PC53 can make because whether or not the NSZ is included as part of the PDP is a separate matter that would require decision making powers this hearings panel have not been delegated. My understanding of the legal position is that the Commission can decline PC53 (or parts of PC53) in response to a submission requesting such.

³³ Page 56 of the s42A report.

- 3.35 Mr Barr states that a reason for not including the NSZ in the PDP is that the NSZ was made operative only relatively recently in 2016, and while the original PC45 was subject to appeals to the Environment Court, the Council advanced the PDP and notified it for submissions. For these reasons it was not considered sound resource management practice to include the NSZ in the PDP. With respect, I consider that justification is weak because the Council are progressing the PDP review in stages. Stage 2 has been recently notified and the Council's website indicates Stages 3 and 4 will follow. At some point in the near future the NSZ will need to be brought into the PDP so that it can become fully operative and for the ODP to be withdrawn.
- 3.36 Mr Barr considers the relevant objectives and policies of the PDP in paragraphs 5.32 to 5.36³⁴ of his section 42A report. At paragraph 5.34³⁵ Mr Barr states that both the ODP and PDP 's suite of district wide objectives and policies make it clear that any retail and commercial activities locating outside the Town Centre, and in Wanaka, the Three Parks Zone, do not undermine the function and viability of these zones. Mr Barr gives particular emphasis to Policy 3.3.10 of the PDP which specifically seeks to avoid commercial rezoning that would undermine the key local service and employment function role that the centres outside of the Wanaka Town Centre and Three Parks Commercial Core provide. With respect to this issue I rely on Mr Copeland's evidence that PC53 has the potential to have significant economic effects on the Three Parks Commercial Core.³⁶
- 3.37 At paragraph 5.35³⁷ Mr Barr states that in his consideration the AA D1 falls under the influence of Policy 3.3.9 in that while the NSZ is not a Township Zone Commercial precinct or a Local Shopping Centre Zone (LSCZ), the policy is more broadly framed at local shopping centres, which is applicable to the NSZ, given the location of the Wanaka Urban Growth Boundary. Mr Barr finds that Policy 3.3.9 supports these commercial areas, provided the development within them is appropriately sized for that purpose. Mr Barr states that this is central to the PC53 request. I agree with Mr Barr. However, I note that Rule 15.5.10³⁸ in the LSCZ of the PDP requires a non-complying resource consent for any individual retail activity that exceeds 300m² GFA.³⁹ It is my opinion, and I think Mr Barr's report agrees, that any retail activity in the NSZ should be of a similar maximum size. PC53 seeks an individual retail activity in the AA D1 which will be four times the size of the maximum permitted retail GFA in the LSCZ. This, in my opinion, highlights how out of character such a large retail activity would be in the local shopping context and how inconsistent (to the extent it would be contrary under a section 104D(1)(b) assessment) such a proposal is to operative Policies 1.7 and 2.6. To assist the Commission, I note a comparable supermarket size to what PC53 seeks to achieve is the new Fresh Choice Supermarket at Cromwell. This supermarket has a GFA of 1,420m², so slightly

³⁴ Pages 17 to 20 of the S42A report.

³⁵ Page 19 of the S42A report.

³⁶ Paragraph 7.4 of Mr Copeland's evidence.

³⁷ Page 19 of the S42A report.

³⁸ Page 15-10 of the PDP.

³⁹ I note that Rule 15.5.10 did not attract any submissions and therefore was approved unchanged through the review process. I assume it therefore cannot be appealed.

larger than that sought by PC53, but not much larger. A supermarket of this size, in any of the LSCZs in the PDP, would in my opinion, be out of character with the community it intends to serve (with the possible exception of Frankton corner given it is on a major arterial hub).

Mr Edmonds' Evidence

3.38 I have read the evidence of Mr Edmonds dated 17 May 2018 and comment as follows.

3.39 At paragraphs 12.19 and 12.20 Mr Edmonds discusses Mr Barr's assessment of the proposal against Policy 1.7. In paragraph 12.20 Mr Edmonds states that he disagrees that policy 1.7 *"necessarily restricts the catchment to the Northlake community"*. Mr Edmonds continues:

*"Certainly, there has always been the intention that retail activities that locate within the zone should provide the local community within Northlake the associated benefits of proximity and convenience. I do not interpret the policy to have any limitation on the catchment that it serves."*⁴⁰

3.40 I refer the Commissioners to my paragraph 3.2 which refers to the section 32 evaluation on Policy 1.7 for PC45 as warranting *"some limited neighborhood commercial amenities for local residents (such as a corner dairy)"*. Reference to *"local residents"* implies, in my view, that the intent of Policy 1.7 was to focus on the needs of the local Northlake community, not the wider Wanaka catchment. This is further reinforced by Resource Management Issue (ii) Community⁴¹ which states *"There is potential to establish a small precinct with community and commercial activities that meet some daily needs and act as a focal point for the Northlake community."*⁴² In my view, Mr Edmonds' Paragraph 53 is a significant departure to the section 32 evaluation (PC43) which sought some limited neighbourhood commercial activities for local residents.

3.41 In Part XIII of his evidence Mr Edmonds reviews Mr Barr's recommended policy changes and makes a number of comments. I have limited my rebuttal to Policies 1.7 and 2.6, Mr Barr's recommended Objective 7, and Standard 12.34.4.2(viii).

3.42 With respect to Policy 1.7 Mr Edmonds considers this should be retained in its current format. I agree with Mr Edmonds and add that there is also a scope (or jurisdiction) issue in making any amendment to Policy 1.7 for reasons expressed elsewhere in my evidence.

3.43 With respect to Policy 2.6 Mr Edmonds recommends retaining this policy as it provides a range of non-residential activities that underpin the vision for the village centre located in the D1 area. Mr Edmonds further

⁴⁰ Page 15 of Mr Edmonds evidence.

⁴¹ Page 12-358 of the ODP.

⁴² Page 12-358 of the ODP.

recommends rejecting Mr Barr's alternative wording in favor of a new Policy 2.8 that he recommends. I agree with Mr Edmonds and add that there is also a scope issue in making any amendment to Policy 2.6 for reasons expressed elsewhere in my evidence.

3.44 With respect to Mr Barr's Objective 7 and associated policies Mr Edmonds considers that these are all beyond the scope of the plan change. I agree with Mr Edmonds.

3.45 With respect to Standard 12.34.4.2(viii) Mr Edmonds recommends the rejection of Mr Barr's recommended changes and instead amend to include reference to "supermarket/food retailing". Mr Edmonds' recommended wording is as follows:

viii. Retail

(a) No retail activity shall occur within the Northlake Special Zone except in Activity Area D1.

(b) No retail activity shall have a gross floor area exceeding 200m², except for one activity with a maximum gross floor area of 1,250m² limited to a supermarket/ food retail activity

*(c) The total amount of retail gross floor area within the Northlake Special Zone shall not exceed 1,250m², excluding a supermarket/ food retail activity established under (b).*⁴³

3.46 For the reasons expressed in my evidence, I do not support Mr Edmonds' recommended changes to (b). I additionally note that I find the wording of Mr Edmonds proposed standard to be confusing and uncertain. For example, it is unclear what the reference "except for one activity" in (b) means. I presume it means a single supermarket or a single food retail activity, however Mr Edmonds' proposed wording does not make this clear. For example, it could mean a 650m² supermarket and a 600m² food outlet contained within a single building and lodged as "one activity". The wording is uncertain in my view.

Conclusion

3.47 The ODP provisions of the NSZ state:

12.33.1 Issues

...

ii Community

*Development in Northlake shall occur in a manner that provides for the integration of activities important for the social wellbeing of the community. There is potential to establish a small precinct with community and commercial activities that meet some daily needs and act as a focal point for the Northlake community.*⁴⁴

12.33.2 Objectives and Policies

Objective 1 – Residential Development

A range of medium to low density and larger lot residential development in close proximity to the wider Wanaka amenities

...

1.7 To provide for small scale neighbourhood retail and commercial activities to serve the needs of the

⁴³ Page 19 of Mr Edmonds evidence.

⁴⁴ Page 12-358 of the ODP.

*local community.*⁴⁵

Objective 2 – Urban Design

Development demonstrates best practice in urban design and results in a range of high quality residential environments.

...

2.6 *To enable visitor accommodation, commercial, retail and community activities and retirement villages within Activity Area D1 including limited areas of small scale neighbourhood retail to service some daily needs of the local community, while maintaining compatibility with residential amenity and avoiding retail development of a scale that would undermine the Wanaka Town Centre and the commercial core of the Three Parks Special Zone.*⁴⁶

3.48 PC53 does not seek to amend these operative provisions. In my opinion, there is no jurisdiction for Mr Barr to recommend changes to these policies or recommend the inclusion of a new Objective 7 (and associated policies).

3.49 PC53 seeks to increase the permitted retail floor within the AA D1 by 150% in order to *enable a small supermarket to be established within the NSZ that can provide local residents with a local grocery shopping alternative*. In my opinion, a supermarket with a retail GFA of 1250m² is not a small supermarket. It is of similar size to the new Fresh Choice supermarket in Cromwell which, in my opinion, is a medium sized supermarket.

3.50 I agree with Mr Barr that the scale of the retail activities at NSZ is similar to what is envisaged within the LSCZ. The LSCZ restricts individual retail activities to a maximum retail floor space of 300m² (GFA). I consider, that it is appropriate to amend Standard 12.34.4.2(viii) to enable the development of a Grocery Store (i.e. a small-scale supermarket) to the same size as that what would be permitted in the LSCZ. In my opinion such would be appropriate in the context of the operative objectives and policies. My recommended wording is as follows:

viii. Retail

(a) No Retail Activity shall occur within the Northlake Special Zone except in Activity Area D1.

(b) No Retail Activity shall have a Gross Floor Area exceeding 200m², with the exception of one Grocery Store which does not exceed a maximum Gross Floor Area of 300m².

(c) The total amount of retail Gross Floor Area within the Northlake Special Zone shall not exceed 1,000m² 1,300m².

3.51 I note a Grocery Store with a retail GFA of 300m² is similar in size to the Four Square at Arrowtown, the Raeward Fresh Queenstown (aka the Mediterranean Food Mart at Gorge Road) and the Four Square at Queenstown.

3.52 To aid the interpretation of this rule, I would suggest as a consequential amendment the insertion of a definition for Grocery Store specific to the NSZ as follows:

⁴⁵ Pages 12-358 and 359 of the ODP.

⁴⁶ Page 12-359 of the ODP.

Grocery Store in the Northlake Special Zone means the small-scale retail sale of meat, fresh produce, dairy, baked goods, canned and packaged goods, as well as ancillary retail sales of various non-food items such as kitchenware, household cleaners, pharmacy products and pet supplies to service some of the daily needs of the local community.

SUBMITTER'S # 6 & 7 ECONOMIC EVIDENCE

Before the Hearing Panel

In the matter of Proposed Plan Change 53: Northlake Special Zone

And

In the matter of Submissions by Central Land Holdings Limited and
Willowridge Developments Limited.

**Statement of Evidence of Michael Campbell Copeland (Economics)
for Central Land Holdings Limited and Willowridge Developments
Limited**

Dated 25 May 2018

I, **Michael Campbell Copeland** of Wellington, Economist, state:

1. INTRODUCTION

Qualifications and experience

- 1.1 My name is Michael Campbell Copeland and I am a consulting economist. I hold a Bachelor of Science degree in mathematics and a Master of Commerce degree in economics.
- 1.2 I am the joint managing director of Brown, Copeland and Company Limited, a firm of consulting economists which has undertaken a wide range of studies for public and private sector clients in New Zealand and overseas. During the period July 1990 to July 1994, I was a member of the Commerce Commission and between 2002 and 2008 I was a lay member of the High Court under the Commerce Act. Prior to establishing Brown, Copeland and Company Limited in 1982, I spent six years at the New Zealand Institute of Economic Research and three years at the Confederation of British Industry. A summary of my curriculum vitae is **attached as Appendix 1**.
- 1.3 With respect to the Resource Management Act 1991 (RMA), I have prepared evidence for clients covering a number of projects and policies. A selection of these is listed at the end of my curriculum vitae in **Appendix 1**.

Background and Purpose of My Evidence

- 1.4 I have been asked to provide evidence on behalf of Central Land Holdings Limited and Willowridge Developments Limited on the economic effects of proposed Private Plan Change 53 (PPC53), requested by Northlake Investment Limited (the applicant). PPC53 seeks to amend the existing rule limiting individual retail outlet's floor areas to 200 m² per activity with a maximum of 1,000 m² in total. The applicant is seeking to allow a total of 2,500 m² of retail space and a single retail activity of up to 1,250 m² gross floor area to facilitate a supermarket, while retaining the 200 m² maximum for other commercial and retail activities within the Northlake Special Zone.
- 1.5 Specifically my evidence addresses:

- (a) Whether there is a need for additional retail space and provision for a 1,250 m² supermarket at Northlake; and
- (b) What might be the economic impacts on existing centres of providing for additional retail space and a 1,250 m² supermarket within the Northlake Special Zone.

1.6 In preparing my evidence I have reviewed:

- (a) The applicant's retail economic effects assessment, which accompanied the application for PPC53 – "Northlake Special Zone Assessment of Retail Economic Effects", RCG Ltd, October, 2017;
- (b) The Council's review of the applicant's retail economic effects assessment and attached as Appendix 2 to the Council Officers section 42A report – "Proposed Private Plan Change 53 – Northlake. Review of Retail Economic Effects Assessment", Market Economics Limited, 26 April, 2018; and
- (c) The evidence of Mr John Polkinghorne for the applicant, dated 17 May, 2018.

Code of Conduct

1.7 I have read and am familiar with the Code of Conduct for Expert Witnesses in the Environment Court's Practice Note December 2014. I have complied with the Code in preparing this evidence. I confirm that my evidence is within my area of expertise, except where I state that I am relying on the evidence or opinion of another person, and that I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

Structure of My Evidence

1.8 Following an executive summary, the remainder of my evidence covers:

- (a) Relevant economic concepts under the RMA;
- (b) Economic benefits from a centres-based approach to managing retail and commercial development within Wanaka;

- (c) The findings of the RCG and Market Economics reports and the implications for the economic effects of allowing a supermarket to be located at Northlake;
- (d) Mr Polkinghorne's evidence; and
- (e) My conclusions.

2. EXECUTIVE SUMMARY

- 2.1 Community social and economic well-being and the efficient use of resources are relevant considerations under the RMA. Although the RMA specifically excludes consideration of trade competition effects on individual competitors, where trade competition effects impact on the overall vitality, vibrancy and amenity values of district or town centres such effects are relevant considerations under the RMA as being beyond trade competition.
- 2.2 Economists and planners generally subscribe to the view that there are a range of economic and social benefits from the consolidation of retail and other commercial development within a limited number of centres within a district or city, rather than having such activity dispersed throughout the district or city. These benefits include agglomeration benefits, community amenity benefits, reduced Council infrastructure costs and lower transport costs.
- 2.3 Existing and planned retail centres within the Wanaka Ward area include the Wanaka CBD, Three Parks, Anderson Heights, Albert Town and Cardrona Valley Road. Northlake under current zoning rules is intended to meet the convenience shopping needs of local residents and not draw from a wider catchment.
- 2.4 With the imminent development of the Three Parks supermarket, the Wanaka ward will be adequately supplied with supermarket floorspace in the medium and possibly longer term. In addition existing planning provisions permit additional supermarket floorspace to be provided at Three Parks, Anderson Heights and elsewhere within existing retail and commercial centres within Wanaka.
- 2.5 There is no requirement for a supermarket or other LFR activities at Northlake. The Operative District Plan's 1,000 m² overall cap and

maximum 200 m² per shop is more than sufficient to meet the convenience retail needs of the Northlake Special Zone's residents.

- 2.6 A supermarket at Northlake, even at the scale proposed, would potentially have significant economic detriments in terms of reduced vitality, vibrancy and amenity values for the Three Parks and Anderson Heights retail and commercial centres in that:
- (a) A supermarket is a key tenant in any shopping centre and even a small supermarket at Northlake will have the effect of diverting regular weekly or fortnightly shopping away from existing centres;
 - (b) Supermarkets are “anchor tenants” in any retail centre and attract other retail and commercial outlets. The extent of other retail development at Northlake will be greater if a supermarket is allowed to be located there. This will compound the economic impact on other centres;
 - (c) Supermarkets vary in size but generally are much larger than 1,250 m² gross floor area (GFA). For example, the existing New World supermarket in Wanaka's CBD is 2,100 m² and the new Three Parks supermarket is expected to be 4,353 m² GFA. If a 1,250 m² supermarket is located at Northlake I would expect, at some time in the future consent, to be sought for its expansion to enable it to better compete with larger supermarkets;
 - (d) The establishment of a supermarket at Northlake is likely to deter or at least delay the establishment of a second supermarket at Three Parks. A second supermarket at Three Parks would not only add considerably to the critical mass of the centre and the consequent agglomeration and other economic benefits but would also increase the level of competition in Wanaka's food retail market; and
 - (e) The Business Mixed Use Zoning in the Proposed District Plan will enable retail activity as a permitted activity at Anderson Heights. The establishment of retail and commercial activities in this locality will be more sympathetic to surrounding residential development than industrial development. This is less likely to occur if a new supermarket is allowed at Northlake.

- 2.7 PPC53, enabling a 1,250 m² supermarket and a total of 2,500 m² of retail space within the Northlake Special Zone, will reduce community social and economic well-being and the efficient use of resources, both now and in the future.

3. ECONOMICS AND THE RMA

Community Economic Well-being

- 3.1 Economic considerations are intertwined with the concept of the sustainable management of natural and physical resources, which is embodied in the RMA. In particular, section 5(2) of Part 2 refers to enabling “*people and communities to provide for their social, economic and cultural well-being*” as part of the meaning of “*sustainable management*”, the promotion of which is the purpose of the RMA.
- 3.2 As well as indicating the relevance of economic effects in considerations under the RMA, section 5 also refers to “*people and communities*” (emphasis added), which highlights that, in assessing the impacts of a plan change, it is the impacts on the community and not just the Council or particular individuals or organisations, that must be taken into account. This is underpinned by the definition of “*environment*” which also extends to include people and communities. Assessing the economic and retail effects of PPC53 requires a district-wide perspective to be adopted.

Economic Efficiency

- 3.3 Section 7(b) of the RMA, also in Part 2, directs that, in achieving the purpose of the Act, all persons “*shall have particular regard to ... the efficient use and development of natural and physical resources*” which includes the concept of economic efficiency.¹ Economic efficiency can be defined as:

*“The effectiveness of resource allocation in the economy as a whole such that outputs of goods and services fully reflect consumer preferences for these goods and services as well as individual goods and services being produced at minimum cost through appropriate mixes of factor inputs”.*²

¹See, for example, in *Marlborough Ridge Ltd v Marlborough District Council* [1998] NZRMA 73 at [86], the Court noted that all aspects of efficiency are “*economic*” by definition because economics is about the use of resources generally.

²Pass, Christopher and Lowes, Bryan, 1993, *Collins Dictionary of Economics* (2nd edition), Harper Collins, page 148.

- 3.4 More generally, economic efficiency can be considered in terms of:
- (a) Maximising the value of outputs divided by the cost of inputs;
 - (b) Maximising the value of outputs for a given cost of inputs;
 - (c) Minimising the cost of inputs for a given value of outputs; and
 - (d) Minimising waste.
- 3.5 There are resource use efficiency considerations in concentrating retail and other commercial activity within a limited number of centres within a district or city. These are discussed later in my evidence.

Viewpoint for Economic Assessment

- 3.6 An essential first step in carrying out an evaluation of the positive and negative economic effects of a proposed plan change is to define the appropriate viewpoint that is to be adopted. This helps to define which economic effects are relevant to the analysis. Typically a district (city) or wider regional viewpoint is adopted and sometimes a nationwide viewpoint might be considered appropriate.
- 3.7 In the case of PPC53, the actual and potential economic effects will mostly be on the community, consisting of residents and businesses of the Wanaka Ward of the Queenstown Lakes District and therefore a Wanaka Ward viewpoint is appropriate.

Effects beyond Trade Competition Effects

- 3.8 The RMA specifically excludes consideration being given to trade competition or the effects of trade competition. However, it is my understanding that where trade competition effects in aggregate are of such significance that they threaten the overall vitality, vibrancy and amenity values of district or town centres then such effects are relevant considerations under the RMA as being effects that extend beyond trade competition effects.
- 3.9 My evidence below addresses these types of effects.

4. THE ECONOMIC BENEFITS OF A CENTRES-BASED APPROACH TO MANAGING RETAIL DEVELOPMENT IN WANAKA

- 4.1 Economists and planners alike, generally subscribe to the view that there are a range of economic and social benefits from the consolidation of retail and other commercial development within a limited number of centres within a district or city, rather than having such activity dispersed throughout the district or city. From an economic perspective I consider the main benefits are:

Agglomeration Benefits

- 4.2 The concentration of commercial activities within a single or small number of centres within urban areas leads to greater levels of business productivity (or efficiency) and economists refer to the benefits from this concentration of commercial activities as “agglomeration economies”.
- 4.3 For example, a study for the New Zealand Transport Agency (NZTA) quantified the positive relationship between higher densities and business productivity for different industries in different regions within New Zealand. A report on the study stated:³

“Links between density of activity and economic performance have been well established and explored by studies internationally. Although the exact sources or causes of these agglomeration effects have proved harder to pin down, it is generally accepted that when firms locate close to each other a number of tangible benefits emerge. Benefits can include more opportunities for labour market pooling, opportunities to share knowledge and technologies, and ease of process specialisation within an industry.”

- 4.4 The NZTA study focused on the potential productivity improvements of agglomeration economies resulting from improved transport links and therefore had a broad regional or district perspective rather than just that of a town or city centre. However, the broad principle is the same and I am aware of other studies focussing on agglomeration economies from increased density in retail and commercial centres. For example, in a report peer reviewing an analysis of the economic impacts of Wellington City's Harbour Quays development, SGS Economics & Planning stated:⁴

³See *Agglomeration Elasticities in New Zealand*, NZTA research report 376; reported in NZTA Research, December 2009.

⁴See Harbour Quays Port Development Economic Assessment; Prepared for the Wellington City Council by Property Economics; February 2006; and Harbour Quays Port

“We strongly support the general propositions in the PE (Property Economics) report that there is a nexus between density and productivity. In this context, we see density as a proxy for a range of factors essential to high levels of livability, such as vibrant street life, a local residential ‘culture’ and a rich, walkable array of entertainment, retail, educational and employment opportunities. We also strongly agree with the implied proposition that the ‘density’ of the existing CBD core helps underpin the broader competitiveness of the City of Wellington.”

Amenity Benefits

- 4.5 Local authorities throughout New Zealand seek to maintain and enhance the level of economic activity within or adjacent to existing commercial centres in their districts or cities because of the amenity benefits (defined to include greater convenience, vitality, vibrancy and “sense of place”) from having clearly identifiable commercial hubs with certain levels of critical mass. Concentration of commercial activity within confined areas is more attractive to residents (as both employees and customers) and to visitors than to have such activities widely dispersed at numerous different locations within a district or city. Customers find it more convenient (e.g. for “comparison shopping”) and less costly (e.g. lower transport costs) to visit a single shopping centre as compared to having to travel to several different retail centres.
- 4.6 This relates not only to the absence of business closures and vacancies within existing business centres, and which might lead to urban blight and the gradual decay of existing centres but also a perception that “more is better” – for example, both businesses and customers benefit from having similar businesses located close to one another for more convenient comparison shopping and it provides greater opportunity for multi-purpose visits.
- 4.7 I am aware of out of centre development in other districts and cities which have negatively impacted on the vibrancy, vitality and amenity values of town and city centres – for example, Hamilton, Hastings, Invercargill, Greymouth and Christchurch even pre the 2010 and 2011 earthquakes. Christchurch was known as the “donut” city because retail development

outside its central business district (CBD) had undermined the central city's primary role in the hierarchy of centres. Over time, the dispersion of retail and commercial activities beyond town and city centres also discourages CBD redevelopment. Enabling greater out of centre retail and related commercial development outside of the existing centres may discourage their redevelopment and expansion.

- 4.8 I also note that there has been considerable emphasis in placing limits on out of centre retail and other commercial development in the Christchurch Replacement District Plan, for which the re-establishment of the Christchurch City CBD is a high priority.⁵

Lower Cost Provision of Public Infrastructure (Public Realm)

- 4.9 The provision of public infrastructure such as roads, footpaths, lighting, landscaping, security surveillance, street furniture and parks and other public spaces benefits from economies of scale – that is the capital and/or ongoing operating and maintenance costs for the provision of these services is likely to be lower from the location of new retail, office and other commercial developments within or adjacent to the existing retail and commercial core than if new retail and commercial developments are dispersed. It is inefficient for councils to be required to provide public facilities across multiple, dispersed and poorly patronised centres.
- 4.10 While it may be possible to set development levies and specific user charges to ensure any additional infrastructure costs and services are internalised within the cost structure of dispersed retail and commercial development, where this is not possible, or not cost effective, there is again a justification for concentration or co-location of such activities, to encourage the minimisation of such costs and to avoid any unnecessary duplication of public facilities and services.

Lower Transport Costs

- 4.11 Having retail, office and other commercial development concentrated within or adjacent to existing retail and commercial centres results in transport costs savings, which include savings in vehicle operating costs, travel time costs, congestion, road accident costs and the costs

⁵See: The Independent Hearing Panel's Decision 1 Strategic Directions and Strategic Outcomes (and Related Definitions) (26 February 2016) on the Christchurch Replacement District Plan (in particular paragraphs 218 and 219, page 56).

associated with trip time unreliability. Encouragement of retail and related commercial development within existing centres also enables the provision of more efficient public transport services.

Summary

- 4.12 Whilst it is difficult to quantify such benefits in monetary or other numerical terms, I consider there is broad agreement among economists and planners that there are significant economic benefits from encouraging retail and related commercial development within existing town centres and discouraging this type of development outside of these existing centres.

Wanaka's Existing Town Centres

- 4.13 With respect to the hierarchy of retail and commercial centres in Wanaka, the RCGreport⁶ identifies the principal existing and potential retail and commercial centres as:
- (a) The **Wanaka CBD** with an existing supermarket and a range of other retail and commercial activity. The RCG report contains a 2007 estimate of 15,707 m² of retail space in the CBD;
 - (b) **Three Parks**, which has been identified as a major retail area for future development, especially large format retail (LFR) activities. Supermarkets are a permitted activity within Three Parks and an application for building consent has been lodged for the development of a new large supermarket at Three Parks. Retail development of 10,000 m² is permitted under Stage 1, with provision for a further 20,000 m² subject to conditions relating to a "Wanaka town centre health check" being met;
 - (c) **Anderson Heights**, which has a number of existing retail activities and scope for new retail and commercial development, particularly under the rules of the Proposed District Plan. The RCG report estimates 2,459 m² of existing retail space at Anderson Heights but I am informed by Central Land Holdings that there is potential for some land to be redeveloped for retail purposes;

⁶ See Section 5, pages 28 and 29 of the RCG report.

- (d) **Albert Town**, which, although it has limited existing retail development, it does have land zoned for significant additional retail development. The RCG report says that there is currently 1,200 m² of existing retail development with 1.2 hectares available for future development; and
- (e) **Cardrona Valley Road** where the Proposed District Plan identifies a 1ha neighbourhood centre, which would enable the development of a supermarket and other retail activities. Currently there is only 1 restaurant and bar that would constitute retail development but varying additional amounts between 3,000 m² and up to 2.7 hectares is being sought by various parties under the provisions of the Proposed District Plan.⁷

4.14 Northlake with its current maximum retail development ceiling of 1,000 m² and a cap for individual activities of 200 m² is intended to meet the convenience needs⁸ of local residents rather than being a “destination centre” for Wanaka residents generally. Allowing a supermarket to be developed at Northlake would constitute out of centre LFR development. Also because of the “anchor role” of supermarkets, I would expect it to generate a greater level of retail development to occur at Northlake than would otherwise occur, even with the 200 m² cap on other individual retail activities remaining in place.

5. THE RCG AND MARKET ECONOMICS REPORTS

5.1 The RCG and Market Economics reports consider in detail projections for retail demand and supply for the Wanaka Ward. In analysing supermarket floorspace demand and supply, the RCG report did not fully account for

⁷ See pages 28-29, RCG report.

⁸That is, those that might be met from for example a 4 Square grocery store rather than a supermarket. The Market Economics report says at page 14: *“In the past, M.E. have applied a model (developed for this purpose) that estimates that neighbourhood centres (defined as smaller in scale than local shopping centres; serve smaller catchments; and have less drive-by role) capture on average 4% of food and liquor retail demand and local centres capture on average 19%. This model was based on an analysis of the Auckland centre network, so there are limitations in applying it elsewhere. However if the Northlake Village captured on average 19% of all available total food retail spend in the ‘northern Wanaka’ catchment, this would support considerably less retail floorspace than the proposed 1,250 sqm GFA supermarket, and notably would be well within the current retail cap.”*Therefore Market Economics view is that even a relatively small 1,250 m² supermarket at Northlake would go well beyond the convenience needs of its local catchment and would need to draw customers from beyond its ‘northern Wanaka’ catchment.

the proposed Three Parks supermarket and the Market Economics report (at page 9) states:

“Overall M.E. concludes that with the planned Three Parks supermarket (likely to be completed in the short-term), the Wanaka Ward will be adequately supplied with LFR food retail space into the medium-term and potentially into the long-term based on a floorspace productivity modelling approach and current growth projections.

It is relevant to point out that supermarkets are permitted in the Three Parks commercial core and there is no limit to the number of supermarkets that may develop in this centre. There is, therefore, capacity to enable a third supermarket in this centre in the long-term (i.e. in the deferred core zone). It is not uncommon for centres to sustain two supermarkets, particularly when that centre is centrally located (as is Three Parks).”

5.2 In the context of PPC53 I consider this conclusion taken from the Market Economics report to be particularly pertinent. Having regard to the proposed new supermarket at Three Parks and the potential for one or more additional supermarkets at Three Parks, there is no projected shortfall in supermarket floorspace supply that might justify an out of centre supermarket at Northlake. Also neither RCG nor Market Economics consider the potential for a supermarket to be built at Anderson Heights.

5.3 Whilst the RCG report is supportive of PPC53 and in particular the proposals to allow a 1,250 m² supermarket at Northlake and for the total amount of retail space at Northlake to increase from 1,000 m² to 2,500 m², the Market Economics is critical of the analysis underpinning the RCG report. The Market Economics report does not support PPC53 and its overall conclusions include⁹:

“The RCG report is strongly focussed on demand relative to current supply but does not adequately examine retail capacity.”

“The share of demand likely to be captured by the Northlake Village is not established and is likely to be only a small share of the total available spending power in the catchment. This is because households (and visitors) will continue to direct the majority of their shopping trips and spend to Wanaka’s main centres.”

⁹Section 6, pages 23 and 24 of Market Economics report.

“Based on M.E.’s estimates, the convenience spend likely to be captured from the Northern Wanaka catchment does not equate to the additional retail floorspace proposed and can be met with no change to the operative Northlake Special Zone retail provisions.”

“There is significant total capacity to cater for future growth in retail demand in the Wanaka Ward (into the long-term), spread among Northlake, Local Shopping Centre zones, the CBD, Three Parks and also the Business Mixed Use Zone. Once the Three Parks supermarket opens, the Wanaka Ward will be adequately supplied for LFR food retail demand into the medium-term future (and potentially beyond). The deferred core zone in Three Parks offers additional capacity for LFR in a central location if required.”¹⁰

“Three Parks and the Wanaka CBD are centrally located and are not a long distance to travel for supermarket shopping. Accessibility to supermarkets is not considered a significant issue for Northern Wanaka. They have a choice of the CBD or Three Parks.”

“M.E. does not believe that an LFR activity is required or appropriate in the Northlake Village. ... The presence of an LFR activity would elevate the scale of the overall centre (beyond just the requested retail increase) and draw custom from a wider catchment.”

“Convenience retail demand, including food retail demand in the Northlake Special Zone and wider Northern Wanaka catchment can, in M.E.’s opinion, be met by the operative retail capacity of 1,000 sqm and a limit of 200 sqm GFA per shop.”

- 5.4 The Market Economics report also disagrees with the RCG report’s claim that the proposed PPC53 provisions will have positive effects on Wanaka’s CBD. At page 18 the Market Economics report states:

“M.E. strongly disagrees with the RCG statement that expansion of the Northlake Village will act as a pressure valve for the Wanaka CBD. This statement (page 45) implies that Three Parks does not exist (nor for that matter the Town Centre transition overlay in the PDP and other retail

¹⁰ Note: The Market Economics report reaches this conclusion having regard to the requirements of the National Policy Statement on Urban Development Capacity for an appropriate “buffer” of supply over demand, especially in high growth districts such as the Queenstown Lakes District.

enabled business zones) and presents a scenario of retailing not being able to expand outside of the geographically constrained CBD.”

- 5.5 Whilst Market Economics’ primary position is that a supermarket is not appropriate or required in Northlake Village¹¹, it concludes that if the expansion of retail space is approved then the rule allowing the single retail activity of 1,250 m² GFA should be amended to specify food retail activity only.¹² This is because in Market Economics’ opinion the economic effects of allowing a 1,250 m² supermarket on existing centres would not be significant, but development of a non-food LFR activity at Northlake would have significant impacts on existing centres.
- 5.6 I concur with the conclusions reached in the Market Economics report, with the exception that I consider that allowing a 1,250 m² supermarket to be developed at Northlake will potentially have significant economic impacts on existing centres. My reasons for this are fivefold:
- (a) A supermarket is a key tenant in any shopping centre and even a small supermarket will have the effect of diverting regular weekly or fortnightly shopping away from existing centres. In this respect I would expect a supermarket to have a greater effect than non-food LFR having the same GFA;
 - (b) Supermarkets are “anchor tenants” in any retail centre and attract other retail and commercial outlets. I would expect the extent of other retail development at Northlake to be greater if a supermarket is allowed to be located there. This will compound the economic impact on other centres;
 - (c) Supermarkets vary in size but generally are much larger than 1,250 m² gross floor area (GFA). For example, the existing New World supermarket in Wanaka’s CBD is 2,100 m² and the new Three Parks supermarket is expected to be 4,353 m² GFA.¹³ If a 1,250 m² supermarket is located at Northlake I would expect, at some time in the future, consent to be sought for its expansion so that it is better able to compete with larger supermarkets – this has been the case in respect of a similarly sized New World “store”

¹¹ Page 20 of Market Economics report.

¹² Page 24 of Market Economics report.

¹³ Source: Page 8 of Market Economics report.

built on Kapiti Coast Airport land and outside the Paraparaumu town centre. The term “store” is used in the Kapiti Coast District Operative Plan because the intent of constraints on the size of food retail activity was to not allow a supermarket to be built. The result has been the establishment of a supermarket (as evidenced by Foodstuffs New World branding of the “store”) and a more recently proposed plan change seeking expansion of it into a larger supermarket;

- (d) The establishment of a supermarket at Northlake is likely to deter or at least delay the establishment of a second supermarket at Three Parks. A second supermarket at Three Parks would not only add considerably to the critical mass of the centre and the consequent agglomeration and other economic benefits but would also increase the level of competition in Wanaka’s food retail market; and
- (e) The Market Economics report does not specifically consider the possibility of a supermarket being located at Anderson Heights.¹⁴ The Business Mixed Use Zoning in the Proposed District Plan will enable retail activity as a permitted activity at Anderson Heights. The establishment of retail and commercial activities in this locality will be more sympathetic to surrounding residential development than industrial development. This is less likely to occur if a new supermarket is allowed at Northlake.

5.7 I believe the establishment of a supermarket at Northlake is unlikely to have a significant economic effect on the Wanaka CBD, beyond trade competition effects. This is because the town centre in addition to its existing supermarket has a broad range of other retail and commercial activities. The diversion of some supermarket sales will not result in a significant reduction in economic activity within the centre. However, for the reasons I have set out in the previous paragraph, I consider that potential economic effects for the Three Parks and Anderson Heights centres would be significant and go beyond simply trade competition effects.

6. MR POLKINGHORNE’S EVIDENCE

¹⁴ The Market Economics report does however state that capacity does exist for future growth in retail demand to be met from within the Business Mixed Use Zone.

- 6.1 Mr Polkinghorne in his evidence makes it clear that he considers the catchment area for the 1,250 m² supermarket and other retail activities that PPC53 would enable is the Northern Wanaka catchment. He states at paragraph 43 that this catchment contains 3,231 households and at paragraph 119 he states:

"I do not agree with the statement at paragraph 9.43 (of the Council Officers' section 42A report) that "the scale of retail activity at Northlake would mean that it serves more than the local community". In my view, the Northern Wanaka catchment defined in the RCG report, which covers most of the northern half of Wanaka but excludes the southern half and outlying areas of the Wanaka Ward can be considered "local".

- 6.2 This indicates that the proposed supermarket and additional other retail activities are intended to meet more than just the convenience shopping needs of Northlake.

- 6.3 Mr Polkinghorne also makes it clear that he sees the supermarket proposed for Northlake to be a significant competitor to supermarkets elsewhere within the Wanaka Ward. He states at paragraph 101:

"The inclusion of a supermarket/grocery tenancy within Northlake will promote healthy competition and allow for more consumer choice in Wanaka. I consider this to be a positive economic effect, which will enable Wanaka residents and visitors to better provide for their economic wellbeing."

- 6.4 Also Mr Polkinghorne identifies that the proposed supermarket will support a larger retail offering at Northlake than would otherwise occur (see paragraph 106 of Mr Polkinghorne's evidence).

- 6.5 Much of the remainder of Mr Polkinghorne's evidence addresses the expected future demand for supermarket floorspace. To my mind the key issue to be addressed is not so much the future demand for supermarket (and other retail) floorspace, but rather where that demand should be met (ie at Northlake, or at one of the existing, recognised centres). I agree with Mr Polkinghorne that having a supermarket at Northlake will be more convenient for some Northern Wanaka residents.¹⁵ However the purpose

¹⁵ At paragraph 13 (c) of his evidence Mr Polkinghorne refers to PPC53 enabling Northern Wanaka residents being able to satisfy some to their "everyday needs" locally. I do not consider supermarket shopping falls into the category of "everyday needs".

of having a hierarchy of centres with planning provisions to protect the vitality, vibrancy and amenity values of a limited number higher order centres is because it creates economic and other benefits which are considered greater than the convenience benefits of a having a larger number of dispersed retail and commercial centres.

6.6 Mr Polkinghorne's evidence reinforces my view that PPC53 will undermine higher order centres by:

- (a) Diverting supermarket and other retail trade from Three Parks and possibly Anderson Heights;
- (b) Deterring or delaying the establishment of a third large supermarket for Wanaka at Three Parks or Anderson Heights; and
- (c) Be the precursor to a future request for a larger supermarket to be built at Northlake.

7. CONCLUSIONS

7.1 Out of centre retail and other commercial development impose costs on the community beyond trade competition effects.

7.2 There exists sufficient capacity in the medium and longer term to meet Wanaka's future food and other retail floorspace demand without the additional retail space enabled by PPC53.

7.3 Allowing a supermarket or other LFR activity at Northlake would be inconsistent with meeting just the convenience shopping needs of local residents but would draw customers from a wider catchment.

7.4 PPC53 has the potential to have significant economic effects on Three Parks and Anderson Heights retail centres.

7.5 PPC53 will reduce community social and economic well-being and the efficient use of resources both now and in the future.

Michael Campbell Copeland

Date: 25 May 2018

APPENDIX 1

CURRICULUM VITAE OF MICHAEL CAMPBELL COPELAND

DATE OF BIRTH	3 October 1950
NATIONALITY	New Zealand
EDUCATIONAL QUALIFICATIONS	Bachelor of Science (Mathematics) 1971 Master of Commerce (Economics) 1972

PRESENT POSITIONS

(Since 1982)	Economic Consultant, Brown, Copeland & Co Ltd
(Since 2017)	Trustee, Trade Aid (Kapiti)

PREVIOUS EXPERIENCE

1978-82	NZ Institute of Economic Research Contracts Manager/Senior Economist
1975-78	Confederation of British Industry Industrial Economist
1972-75	NZ Institute of Economic Research Research Economist
1990-94	Member, Commerce Commission
2001-06	West Coast Regional Council Trustee, West Coast Development Trust
2002-08	Lay Member of the High Court under the Commerce Act 1986
2003-11	Director, Wellington Rugby Union
2010-13	Director, Southern Pastures
2010-17	Director, Healthcare New Zealand Holdings Limited

GEOGRAPHICAL EXPERIENCE

- New Zealand
- Australia
- Asia (Cambodia, India, Indonesia, Kazakhstan, Malaysia, Nepal, Pakistan, People's Republic of China, Philippines, Tajikistan, Sri Lanka, Uzbekistan, Viet Nam)
- South Pacific (Cook Islands, Fiji, Kiribati, Tokelau, Tonga, Tuvalu, Vanuatu, Western Samoa)
- United Kingdom

AREAS OF PRIMARY EXPERTISE

- Agriculture and Resource Use Economics (including Resource Management Act)
- Commercial Law and Economics (including Commerce Act)
- Development Programme Management
- Energy Economics
- Industry Economics
- Transport Economics

RESOURCE MANAGEMENT ACT SPECIFIC PROJECTS

- Port storage facilities at Westport;
- The proposed Clifford Bay ferry terminal;
- The proposed pipeline and related facilities to utilise water from the Waikato River for metropolitan Auckland;
- A container terminal expansion by the Ports of Auckland;
- The proposed Variation No. 8 to the Wellington City District Plan covering height and other controls on development of the airspace above the Wellington railway yards;
- Proposed expansion of Paraparaumu town centre within the Kapiti Coast District;
- Wellington City Council's heritage preservation policy;
- Solid Energy's proposed West Coast Coal Terminal at Granity;
- Solid Energy's Mt William North coal mine at Stockton in the Buller District;
- The proposed Waimakariri Employment Park;
- The designation of land for a proposed motorway extension in the Hawke's Bay;
- The Hastings District Council's Ocean Outfall – two consent renewal applications;
- A proposed new shopping and entertainment centre in Upper Hutt;
- Rezoning of land in Upper Hutt from Business Industrial to Residential;
- New regional correctional facilities in Northland, South Auckland, Waikato and Otago;
- Proposed controls on wake generation by vessels travelling within the waterways of the Marlborough Sounds;
- The expansion of marina facilities within the Marlborough Sounds;
- Southern Capital's proposed new township at Pegasus Bay, north of Christchurch;
- Renewal of water resource consents for the Tongariro Power Development Scheme;
- Economic analysis inputs to a Section 32 report for the Waitaki Water Allocation Board;
- The imposition of land use restrictions within noise contours surrounding Christchurch International Airport;
- The expansion of the Whangaripo Quarry in Rodney District;
- The economic significance of Winstone's proposed quarry at Wainui, in the north of Auckland City;
- A proposed five star hotel development for Wanaka;
- Holcim's proposed new cement plant near Weston in the Waitaki District;
- TrustPower's proposed new wind farm at Mahinerangi in Central Otago;
- TrustPower's proposed new Arnold hydroelectric power scheme on the West Coast;

- McCallum Bros and Sea Tow Limited's appeal before the Environment Court regarding extraction of sand from the Mangawhai-Pakiri embayment north of Auckland;
- The development of the Symonds Hill pit at Winstones' Hunua Quarry;
- The rezoning of land for residential development at Peninsula Bay, Wanaka;
- The rezoning of land for more intensive residential development at PekaPeka on the Kapiti Coast;
- A gondola development for the Treble Cone skifield;
- A gondola development for the Snow Farm and Snow Park skiing and snowboarding facilities;
- The extraction of gravel from the bed of the Shotover River;
- The proposed Hilton hotel development on Wellington's Queen's Wharf;
- Land use restrictions in relation to the Runway Extension Protection Areas for Christchurch International Airport;
- A new residential and commercial development by Apple Fields at Belfast on the outskirts of Christchurch;
- A proposed business park development on land at Paraparaumu Airport;
- The proposed redevelopment of Wellington's Overseas Passenger Terminal;
- The proposed Central Plains irrigation scheme in Canterbury;
- The staging of residential and business development at Silverdale North in the Rodney District;
- The redevelopment of the Johnsonville Shopping Centre;
- A Plan Change enabling the relocation of existing development rights for a residential and commercial development on Mount Cardrona Station in the Queenstown Lakes District;
- A new Pak'n Save supermarket at Rangiora;
- New supermarkets at Kaiapoi, Whitby, Silverstream and Havelock North;
- The extension of the TeRereHau wind farm in the Tararua District;
- MainPower's proposed new wind farm at Mount Cass;
- Fonterra's proposed new milk processing plant at Darfield and its subsequent expansion;
- Fonterra Pahiatua milk powder plant expansion;
- Fonterra's proposed new coal mine in the Waikato District;
- Assessment of the economic significance of ANZCO's Canterbury operations to the Canterbury regional economy;
- Resource consent extensions for Oceana Gold (New Zealand) Limited's gold mining operations at Macraes Flat in north-east Otago, the Globe Mine at Reefton and a proposed underground gold mine at Blackwater on the West Coast;
- Designation of land for NZTA's Waterview motorway project in Auckland;
- Designation of land and resource consents for NZTA's Transmission Gully motorway project in Wellington;
- Designation of land and resource consents for NZTA's MacKays to Peka Peka Expressway;
- Designation of land and resource consents for NZTA's PekaPeka to Otaki Expressway;
- Resource consents for NZTA's Basin Reserve Bridge Project;
- Resource consents for NZTA's Puhoi to Warkworth motorway extension;
- Resource consents for the Ruataniwha Water Storage Scheme;
- Assessment of the economic effects of a Queenstown Airport Corporation's proposed Notice of Requirement for the designation of additional land for aerodrome purposes;
- Assessment of the retail effects of proposed Plan Change 19 to the Queenstown Lakes District's District Plan;

- Assessment of the regional and national economic significance of Lyttelton Port;
- The economic benefits of utilising a Recovery Plan under the Canterbury Earthquake Recovery Act for the rehabilitation and enhancement of facilities at Lyttelton Port;
- The economic effects of the Lyttelton Port Company's Capital Dredging Project;
- Meridian's proposed new Mokihinui hydro scheme;
- Assessment of the economic effects of alternative wreck recovery options for the MV Rena;
- Assessment of the economic benefits and costs of Transpower's corridor management approach to giving effect to the National Policy Statement on Electricity Transmission in District and City Plans;
- Assessment of economic effects of a proposed extension to Arrowtown's urban boundary;
- Assessment of the economic benefits of overhead deployment of ultrafast broadband infrastructure;
- Assessment of the economic benefits of the proposed Ruataniwha Water Storage Scheme;
- Preparation of evidence for Transpower in relation to the proposed Ruakura development on the outskirts of Hamilton City;
- Preparation of two reports reviewing the economic benefits of the Hobbiton movie set at Matamata;
- Assessment of the economic benefits of renewal of a water discharge consent for Silver Fern Farm's Belfast meat processing plant;
- Preparation of evidence for Transpower in relation to the Proposed Auckland Unitary Plan;
- Preparation of evidence for Christchurch International Airport Limited, Transpower, Ngāi Tahu Property Limited, the Lyttelton Port Company, Tailorspace Limited, Church Property Trustees, the Roman Catholic Bishop of the Diocese of Christchurch, Pacific Park Limited, Fulton Hogan and the Christchurch Aggregates Producers Group in relation to the Proposed Christchurch Replacement District Plan.
- Preparation of evidence for Darby Planning LP, Soho Ski Area Limited, Treble Cone Investments, Lake Hayes Ltd, Lake Hayes Cellar Ltd and Mount Christina Limited in relation to economic issues concerning the Rural and Rural Recreation and Rural Lifestyle Chapters of the Proposed Queenstown Lakes District Plan;
- Preparation of evidence for Coastlands Shoppingtown Limited in relation to the proposed Kapiti Coast District Plan;
- Preparation of evidence for Tinline Properties Limited in relation to a proposed plan change to enable the establishment of an out of centre supermarket;
- The assessment of the economic effects of a proposed Plan Change for safeguarding the future efficient operations of the Rangiora Airfield;
- The assessment of the economic effects of proposed changes to Queenstown Lakes District Plan covering the Jack's Point resort area;
- The assessment of the economic benefits of the development of a marquee golf course in Christchurch;
- Economic assessment of Waitemata Harbour Crossing Project alternatives.