

Before the Independent Commissioner  
Appointed by the Selwyn District Council

Under the Resource Management Act 1991

In the matter of Clause 21 of the First Schedule of the Resource Management Act 1991 (Plan Change 71) being a request by Four Stars Development Limited and Gould Developments Limited to rezone approximately 53 hectares of land in East Rolleston from Rural Inner Plains Zone to Living Z and Living Z Zone Deferred

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**Statement of Evidence of Rebecca Jayne Parish for Foodstuffs (South Island) Properties Limited**

31 January 2022

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**Submitter's solicitor:**

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## Introduction

- 1 My name is Rebecca Jayne Parish. I am the Property Development Manager for Foodstuffs (South Island) Limited. I have approximately 26 years' experience as a resource management, project management, and project consenting specialist. I have been employed by Foodstuffs for 20 years. I confirm that I am authorised to give evidence on behalf of Foodstuffs (South Island) Properties Limited (**Foodstuffs**) a Submitter on PC71.
- 2 I have extensive experience in the property investment, development and supermarket industry, particularly in the South Island. My role at Foodstuffs includes being responsible for all aspects of planning, consenting and land development matters.

## Rolleston PAK'nSAVE

- 3 Foodstuffs owns and is intending to develop the site at 157 Levi Road, Rolleston for a PAK'nSAVE. Resource consents were lodged late last year along with comprehensive technical assessments which supported the proposal as appropriate within the site specific context.
- 4 Foodstuffs has requested public notification, and will actively seek to secure a decision within the minimal timeframes possible under the Resource Management Act 1991. A decision on the Application could reasonably be expected May/June this year. If consent is granted, construction of the PAK'nSAVE supermarket would commence following receipt of Building Consent (estimated to be October 2022), with completion within 12 months. The PAK'nSAVE supermarket could feasibly be operating before any residential activity associated with PC71 (if approved) was established.
- 5 Construction will create employment for 100 people and generate \$10 Million in household incomes, and once operational the PAK'nSAVE will employ 260 people permanently.
- 6 Supermarkets are essential infrastructure and provide daily support for communities. They are open extended hours weekly for 362 days per year. Events such as the Canterbury earthquakes and more recently COVID-19 have shown the vital role supermarkets play in our communities and it is important that they remain open and able to operate efficiently. As we have seen with COVID-19, food distribution is an essential part of maintaining some normalcy in the face of a crisis. Foodstuffs has identified that there is a need for, and the community would benefit from, a PAK'nSAVE offering in Rolleston both now and in the future. Foodstuffs has been analysing the grocery market in Selwyn catchment since it first built New

World Rolleston<sup>1</sup> based on a variety of factors including customer spend, household income, transportation changes, supermarket catchment size, and future growth and development patterns (including in overlapping catchments and adjacent areas such as Hornby and Ashburton). Foodstuffs has also been investigating suitable sites for a PAK'nSAVE food warehouse for 12 years in Selwyn. There are no suitable sites large enough in the town centre, or any other commercial areas zoned in either the operative and proposed Selwyn District Plans in Rolleston. Foodstuffs had sought and was granted a resource consent for a PAK'nSAVE food warehouse on its New World Rolleston site, but this is now planned to be more appropriately relocated to 157 Levi Road, Rolleston.

- 7 Specific criteria must be met for a site or location to be considered suitable for a supermarket operation. Supermarkets require sites that are central to their catchment population. They are often located near an existing centre, or within or adjacent to residential areas. They are located on routes that are suitable for large delivery vehicles and routes that can sustain high levels of traffic, generally those which are used for travel to and from work. Supermarkets need to be designed to be operationally efficient and address health and safety considerations, such as ensuring servicing and loading areas are sufficiently separate from customers.
- 8 In a residential location, there are many positive benefits of the supermarket being close to its customer base – providing accessibility, convenience and choice, walkable and reducing car dependency or travel time. However, careful design and sufficient setbacks need to occur between activities to ensure appropriate integration of the supermarket with surrounding residential areas do not create unacceptable amenity effects on neighbours (such as from a noise and visual perspective) as this can ultimately constrain and hinder the efficient and effective operation of a supermarket (i.e. through complaints and restrictions). This interrelationship applies regardless of whether residential activity or commercial activity is located first. In this situation, it is essential it is planned for in PC71.
- 9 Foodstuffs' experience is the inter-relationship between residential activity and supermarkets can be successful. The Site has been designed to ensure this is possible within the site specific and operational constraints, particularly considering orientation of the building, setbacks, buffers and screening. We would expect the Applicant to take the same approach to PC71. Otherwise there will likely be negative consequences for Foodstuffs, the future residents and the wider community.

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<sup>1</sup> New World Rolleston was built 21 years ago.

- 10 PC71 proposes residential activity on rural land outside of the township boundaries in an area not marked for future urban growth in Rolleston. It is directly adjacent to the PAK'nSAVE site and having now become aware of the development, the PC71 proponent still completely ignores Foodstuffs and its future activity and the associated future effects PC71 will have on the development on the basis it is not yet lawfully established. At the same time, PC71 plans for a future proposed Council reserve which is outside of the urban boundary, on rural zoned land, and has no legal planning status.
- 11 PC71 seeks to locate residential activity (soon to be enabled medium density residential activity) right up to the common boundary by the supermarket loading dock. The PC71 proponent has not planned for or provided any protection measures or buffers, has not offered any mitigation measures, has not offered any setbacks, landscaping or amenity treatment. The Application has proposed (and continues to propose) impossible, unachievable and unsafe traffic and pedestrian connections into the supermarket site without speaking to Foodstuffs as landowner. The ODP linkages proposed to connect to the supermarket site would allow supermarket traffic to rat run through the PC71 network and these roads would preclude the proposed layout of the supermarket and create conflict with heavy vehicles servicing the supermarket along the eastern boundary of the supermarket site. These links will simply not happen in practice. The Applicant hasn't listened to Foodstuffs nor have they assessed the traffic implications of removing these links as requested by Foodstuffs. It is impractical and futile planning for something that will not occur. It is also unclear why the proposed extension of Broadlands Drive cannot go through the PC71 proponent's land if it is necessary for development of the PC71 area. Foodstuffs opposes this link over its land.
- 12 The proposed PAK'nSAVE site and PC71 are incompatible and create unacceptable adverse effects. Complaints from residents regarding noise and/or amenity effects could hinder or restrict the operation of an essential service. Mitigation must be advanced by both parties to ensure effects are managed appropriately. In its resource consent application, Foodstuffs has planned for a high-amenity residential environment and this will apply to the PC71 area. Specifically, it has proposed to limit night-time delivery activities to two movements per night, it has setback its building as far as operationally practicable from the common boundary with PC71 (18.2m), proposed acoustic fencing and a substantial planting/biodiversity strip along the common boundary.
- 13 Foodstuffs reasonably seeks that PC71 also incorporates necessary setbacks (in the form of a no build zone, walkway or open space), acoustic fencing, appropriate noise levels (as these will apply at the boundary of the PAK'nSAVE site), and removes futile proposed transport and pedestrian links into the PAK'nSAVE site. Such transport and pedestrian links or vehicle connections to residential activity

along this goods delivery access is not practical, secure or desirable and would have health and safety effects. In my experience, it is not unreasonable for a potential greenfield site to an existing urban area to provide measures such as these.

- 14 Foodstuffs also seeks specific recognition in PC71 that financial contribution is required in relation to growth in the surrounding urban environment towards all roading infrastructure and upgrades, including pedestrian/cycle links, pathways in the road corridor, and future transport links.
- 15 Amendments to PC71, ODP5 and associated provisions are reasonable and necessary for a well-functioning future urban environment which benefits the community. Until PC71 acknowledges the effects and operational requirements of Foodstuffs' proposed PAK'nSAVE, and specifically includes appropriate setbacks and mitigation for certainty and removes all links into its site, Foodstuffs as an affected neighbour cannot support PC71 and seeks that it is declined.

Dated this 31<sup>st</sup> day of January 2022

**Rebecca Parish**