

**Before the Hearings Panel appointed by
the Christchurch City Council**

Under the Resource Management Act
1991 (**Act**)

And

In the Matter of an application under section 88 of
the Act for land use consent to
establish and operate a new
supermarket and associated small
scale retail including signage,
servicing, access, carparking and
landscaping

**Statement of Evidence of
Natalie Dianne Hampson
for Woolworths New Zealand Limited**

Dated: 18 July 2025

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INTRODUCTION

Qualifications and Experience

1. My full name is Natalie Diane Hampson. I am the Director of Savvy Consulting Limited. I hold a Master of Science degree in Geography from the University of Auckland (first class honours). I am an associate member of the New Zealand Planning Institute and a member (and regional committee member) of the Resource Management Law Association.
2. I have worked in the field of economics for over 20 years for commercial and public sector clients with a particular focus on economic assessment within the framework of the RMA. Since 2001, I have specialised in studies relating to land use analysis, assessment of demand and markets, the form and function of urban economies and growth, policy analysis, and evaluation of economic outcomes and effects, including costs and benefits.
3. I have considerable experience in the field of retail economics, including modelling and assessing commercial centres, their role in urban economies, shopping behaviour (spending patterns and trip behaviour), understanding demand and supply, and assessing the distributional effects of retail development.
4. I have provided evidence on a range of plan changes, submissions and resource consent applications relating to commercial centres in the Greater Christchurch area. This includes Plan Change 5, Halswell North, and Belfast North in Christchurch City and the proposed Large Format Retail Zone and Lincoln Town Centre in Selwyn District. I have recently assessed the distributional effects of a proposed new centre in Waimakariri District. I have a sound knowledge of the Greater Christchurch centre hierarchy.
5. Much of my work in the last two years, other than related to commercial centres, has also been within Greater Christchurch. This includes assessments of multiple industrial and residential rezoning proposals (including Fast Track applications), as well as a range of other economic assessment on behalf of Christchurch International Airport Limited, Ngāi Tahu and other private sector developers. Overall, I have a sound knowledge of the Greater Christchurch spatial economy and its growth pressures.

Background and Involvement

6. I prepared, jointly with Market Economics Limited, the *“Proposed St Albans Local Centre Development – Economic Effects Assessment”* report dated October 2024 that was submitted with the Woolworths New Zealand Limited (**Applicant**) resource

consent application (**Proposal**). I had a phone meeting with Property Economics on the 24th of January following the release of Christchurch City Council's (**Council**) request for further information (**RFI**). The purpose was to further understand their initial position on the consent application and their consequent advice to the Council Officer (Mr Blair). This was followed up with a memo, dated 26 February 2025, that responded in writing to economic matters raised in the RFI, with some further technical material requested by Property Economics appended to the memo.

7. I visited 476-494 Madras Street, St Albans (**Site**), the surrounding residential area and the Edgware Centre on 10 June 2025. I spent the morning and early afternoon in Edgware Centre, observing the way that the local community and other shoppers engaged with centre businesses and how the centre supported economic and social wellbeing. I discuss those observations later in my evidence in response to submissions.
8. Mr Blair makes reference to the Woolworths submission on Plan Change 14 in relation to the Site. I was not involved in that submission.

Code of Conduct for Expert Witnesses

9. Although this is not an Environment Court hearing I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. This evidence is within my area of expertise, except where I state that I am relying on material produced by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

SCOPE OF EVIDENCE

10. The topics covered in my evidence are as follows:
 - (a) current retail environment;
 - (b) the Proposal;
 - (c) effects assessment;
 - (d) response to submissions; and
 - (e) response to Section 42A Report.
11. I have read the Section 42A Report prepared by Mr Blair and the accompanying economic report and addendum by Property Economics.
12. I have read all other evidence prepared for the Applicant.

13. I have also read those submissions lodged on the Proposal relating to economic or social effects.

EXECUTIVE SUMMARY

14. The District Plan has anticipated a supermarket-based neighbourhood centre in St Albans to serve the convenience needs of the surrounding community for a long period of time. No such centre has been delivered by the market. In the meantime, the number of households living in the surrounding area has grown significantly through housing redevelopment and intensification. This has generated strong demand for supermarket and other convenience retail floorspace.
15. The only supply of supermarket floorspace in the local area is the small FreshChoice in the Edgeware local centre. This 950sqm GFA store functions mainly as a grocery store, meeting the needs of the local community for daily "*top-up*" grocery shopping but not their weekly supermarket shopping needs. This has resulted in demand for weekly supermarket shopping being directed out of the area to other more distant full-service supermarkets. This leakage is not supporting an efficient urban form or function.
16. Given the layout of the existing Edgeware local centre, redevelopment to include a full-service supermarket that would better meet current and projected community and catchment needs is not practicable. In the absence of a full-service supermarket in the area, the inefficient shopping travel patterns will continue (and adversely impact an increasing number of households).
17. The Proposal delivers a full-service supermarket and a small group of sleeved convenience stores in the location of the St Albans Neighbourhood Centre Zone. The Proposed expands into the adjoining brownfield residential land. This expansion assists in providing a commercially feasible development site (in terms of shape and size) while responding to the scale of local demand (current and projected growth).
18. The resulting total floorspace of the proposed centre is only moderately larger than the anticipated floor area of the anticipated St Albans neighbourhood centre. It equates to a large neighbourhood centre (or conversely a small local centre), noting that there is considerable overlap of centre sizes already across the centre hierarchy. However, the role and function of a centre is also determined by the number and range of stores it provides. In this regard, the small number of proposed stores means only limited functional amenity will be provided by the centre. This functional amenity is commensurate with the role of a neighbourhood centre and the Proposal does not approach the number and range of stores typically provided in local centres, including in the larger Edgeware Centre.

19. Property Economics and I agree that the Proposal will be effective in meeting the supermarket needs of the surrounding community and that the Site is an appropriate location for a full-service supermarket given the absence of other development opportunities. We also agree, as confirmed by Mr Blair, that the Proposal will have no impact on the role or function of any other centre, including Edgware. Nor does the Proposal have any adverse economic effect on the revitalisation of the City Centre.
20. The Proposal delivers significant positive economic effects. In addition to the short-term construction impacts it will create a focal point for the surrounding residential community, create a large number of long term jobs and improve access to convenience retail while still complementing the larger and more diverse Edgware centre. The supermarket component of the Proposal will ensure a more efficient urban form by reducing supermarket shopping travel to a range of more distant full-service supermarkets. Overall, I consider that the Proposal contributes significantly to economic and social wellbeing and has no material adverse economic effects. From an economic perspective, I therefore support the granting of consent.

CATCHMENT AND RETAIL ENVIRONMENT

The Role of Supermarkets

21. Supermarkets are a convenience retailer that generate the highest frequency of shopping visits by households of any retail store type. They play an important role in New Zealand's retail environment and the economic and social fabric of communities. They:
 - (a) are key generators of employment;
 - (b) provide a solid anchor for commercial activities and investment within centres;
 - (c) provide a convenient and accessible place for people to purchase a wide variety of goods, from fresh produce to household items, under one roof;
 - (d) often offer additional services such as pharmacies, banking, and postal services, making them integral to daily life;
 - (e) can serve as essential community hubs;
 - (f) often engage in community support activities, such as sponsoring local events, donating to food banks, and supporting charitable causes, which strengthens community ties and fosters a sense of social responsibility; and

- (g) continue to evolve and adapt to meet consumer needs, changing shopping preferences, and commercial pressures.
22. Unlike other large format retail stores that can be consolidated in a single or limited number of locations within a city,¹ supermarkets exist in a dispersed network of stores, with most supermarket brands serving localised trade catchments.² As urban areas expand, so too does the supermarket network expand to help maintain accessibility and minimise shopping travel distances. This form of network growth (incremental expansion of the supermarket network commensurate with urban sprawl) has been a key focus of the supermarket industry for many decades and will continue to be important in the future. However, as urban environments intensify, so too does this sustain more supermarket floorspace and new stores within existing urban areas.
23. This creates challenges as supermarkets (particularly full-service or full-sized supermarkets) require large sites which are difficult to obtain in established and intensifying urban areas (and within planning rules and fixed centre networks). Expanding existing stores in established centres is equally challenging. Even if adjoining lots can be purchased and redeveloped, this may result in the loss of existing businesses that were contributing to the functional and social amenity of the centre (or loss of houses). I foresee the insertion of more supermarkets in otherwise mature urban markets that are undergoing redevelopment and intensification pressure – particularly in New Zealand's largest cities – as the key focus of the supermarket industry today and in the decades to come. This is something that planning frameworks will need to consider carefully as they are periodically reviewed.
24. The St Albans centre provides a rare opportunity to improve access to a full-service supermarket in an established and intensifying city-centre fringe location. This is because it is a vacant commercial zone that currently has some expansion potential into the adjoining vacant residential zone. The ability to re-shape and modestly expand the size of the St Albans commercial centre (which I consider necessary and economically efficient) is not an opportunity that is going to last. It is likewise not an opportunity that can be replicated elsewhere in St Albans/Edgeware given the complete lack of other vacant or easily redeveloped 1.4ha landholdings.

Indicative Trade Catchment

25. To inform my assessment of economic effects of the proposed Woolworths supermarket, I first defined an indicative primary and secondary trade catchment.

¹ Predominantly large format retail zones and within the largest centres in the centre hierarchy.

² Pak'n Save tend to have fewer stores that serve larger catchments.

The primary catchment is an area where the majority of the proposed centre's annual sales are estimated to originate from, while the secondary trade catchment is an area from which the centre may attract occasional spend, but would otherwise have a low market share due to the presence of more competing supermarkets. My evidence focusses on the indicative primary catchment.

26. I defined these indicative catchments using 2018 Statistical Area 2 boundaries (**SA2s**). While these are relatively coarse, SA2s are used by Statistics NZ to capture areas with a similar character and aim to be socially homogenous and capture a "*community of interest*". SA2s (2018) is also the resolution of the Retail Demand Modelling I have used³ to estimate current and projected household, business and tourist spend on food, grocery and liquor retail. Figure 1 illustrates my indicative primary trade catchment, showing the Site and surrounding centre network. My primary trade catchment, which comprises just 3 SA2s, captures what I consider to be the surrounding residential community – extending⁴ 800m (or less) east and west from the Site and around 1,000m north and south – all of which I consider walking distance or a very short drive.
27. For ease of comparison, I have included Property Economics' primary (core) trade catchment from their May 2025 assessment of the Proposal in Figure 1, as well as their estimated neighbourhood centre catchment included in their addendum. The difference between my primary catchment extent and the Property Economics primary catchment for the Proposal is just the northward extent. I note that Property Economics have defined their primary catchment using the finer Statistical Area 1 boundaries (2023).
28. For the northern area of difference, there is an SA2 that fits within the western side of that polygon.⁵ I have excluded that SA2 from the primary catchment as I considered that many residents in that area would likely to be pulled towards the supermarket in Merivale (which is in a centre with significant functional amenity). As such, I included that SA2 in my secondary trade catchment to reflect that a lower proportion of supermarket spend across the whole SA2 might be expected to choose the proposed Woolworths. There is not an SA2 that fits wholly within the eastern side of the northern area of difference. The overlapping SA2 (2018 boundaries)⁶ extends much further north, approaching the Homebase Centre. I considered that many residents in that SA2 would be more likely to travel east to the Shirley/Palms town centre or north to Homebase. As such, I included that SA2 in my secondary trade catchment – again on the assumption that a lower portion of residents might choose to shop at the proposed Woolworths.

³ Developed by Market Economics.

⁴ As the crow flies.

⁵ It is labelled St Albans North in the 2018 SA2s.

⁶ It is labelled Mairehau South in the 2018 SA2s.

29. I use the term “*indicative*” or “*estimated*” with regard to the extents of the trade catchments as the actual trade catchment of the proposed Woolworths (and total Proposed centre) or neighbourhood centre anticipated by the provisions for St Albans would not be known until it was up and trading (and would require primary data collection to confirm).

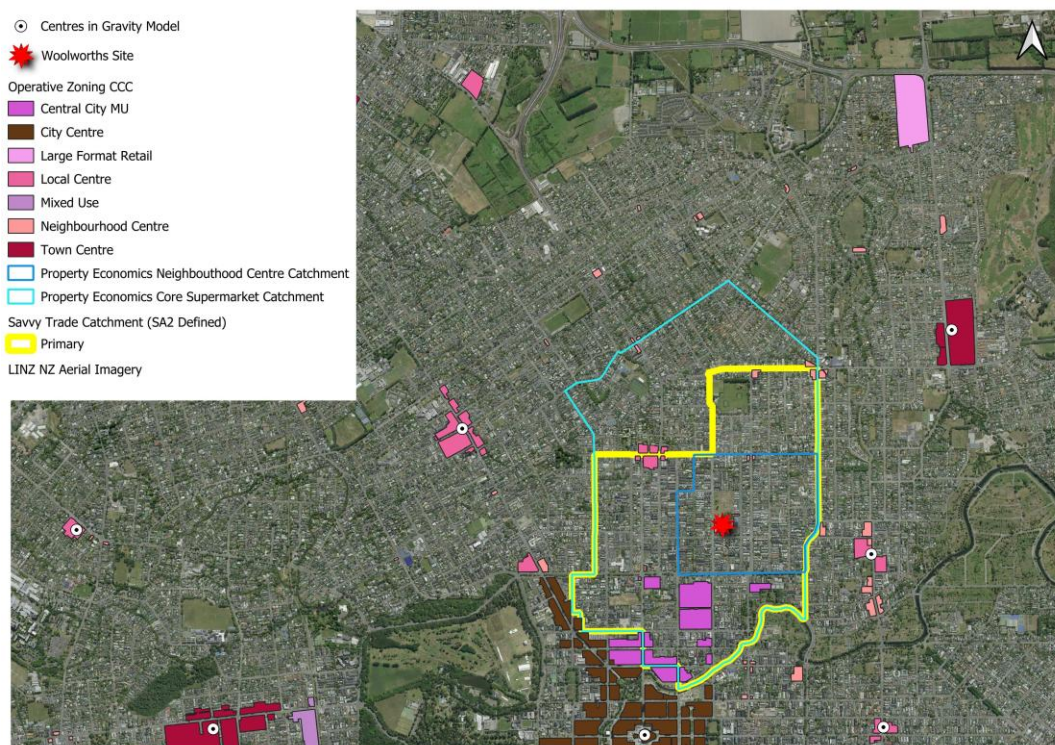


Figure 1 – Indicative Primary Trade Catchment and Centre Network

Demographics and Demand

30. The resident population of the indicative primary catchment was 11,220 in June 2023. It made up 3% of the total population in Christchurch City but grew by a significant 28% between 2014 and 2023 (total growth of 2,460 people or an average of 273 additional residents per annum over that period), meaning that the indicative primary catchment accounted for 6% of population growth in Christchurch since 2014 (and in fact 10% of city growth since 2018). This strong growth has been driven by redevelopment and intensification of this popular city-centre fringe location. There were 1,195 dwellings consented in the indicative primary catchment between February 2018 and February 2024 (an average of 200 dwellings per annum). 91% of that dwelling growth was for attached housing.
31. Statistics NZ considered (in their 2022 SA2 population projection updates) that the indicative primary catchment would continue to experience above average growth (demand) into the medium-long term. The 2023 resident household count in the primary catchment is estimated at 4,720. By converting the StatisticsNZ SA2

population projections (medium growth series) to households,⁷ the data shows that resident household growth in the primary catchment could increase by another 2,010 dwellings (from 4,720 to 6,730 or growth of 43%) over the two decades to 2043.

32. I have converted this household growth into household spend projections for the primary trade catchment, focussing on annual spending in the food, grocery and liquor retail store types.⁸ In 2023, resident household spend was estimated at \$46m, increasing to \$81m by 2043. This is total growth in food, grocery and liquor household spending in the primary catchment of \$35m or 77%. Any food, grocery and liquor retail spend generated by businesses, workers, and tourists in the primary catchment (and noting that there are a number of motels located a short walk from the Proposal site along Bealey Avenue) is minor relative to household demand, but net additional.
33. Given that food, grocery and liquor spending is highly localised (or at least should be in a centre network that is operating effectively and efficiency), with most spend directed to stores that are closest to people's residential address,⁹ there is potential for a large share of this spend to be sustained (as food, grocery and liquor floorspace) in the indicative primary trade catchment (or in centres close to its boundary).
34. Currently very little of this food, grocery and liquor demand is being met by businesses located within the indicative primary catchment and much of it is being spent outside of the indicative primary catchment in the secondary trade catchment area and beyond, including in the large supermarkets located south of the CBD. I discuss the supply of food, grocery and liquor retail in the indicative trade catchments below.

Current Supply

35. Combined, the primary and secondary¹⁰ trade catchments create a study area which identifies the most relevant zoned centres to be analysed. These can also be found in Figure 1 above. Understanding the existing centre network that surrounds the St Albans centre Site is key to understanding how food and grocery retail demand is (or is not) being met by supply, where the proposed development is likely to compete (which centres, and which stores in those centres), and how resilient those centres would be to that trade competition.

⁷ Using the StatisticsNZ 2021 released household projections for Christchurch City.

⁸ This is the ANZSICs for 'Supermarket and Grocery Stores' and those that fall within the 3-digit 'Specialist Food Retailing' category.

⁹ Accessibility to self-catering visitor accommodation is also convenience based.

¹⁰ Refer Figure 1.3 of the Economic Assessment report for the extent of the secondary catchment.

36. My detailed assessment of the surrounding centre network is set out in Section 3 of my economic report. For my evidence, I use the centre types (zones) in the post Plan Change 14 (**PC14**) District Plan (while my report used the pre-PC14 centre zones). I examined the current (2023) business and employment mix of 1 town centre (Shirley/Palms), 4 local centres (Edgeware, Merivale, Richmond/Stannmore and Bealey-Papanui), and 13 neighbourhood centres. The employment composition and relative scale of those centres is summarised in Figure 2 below.

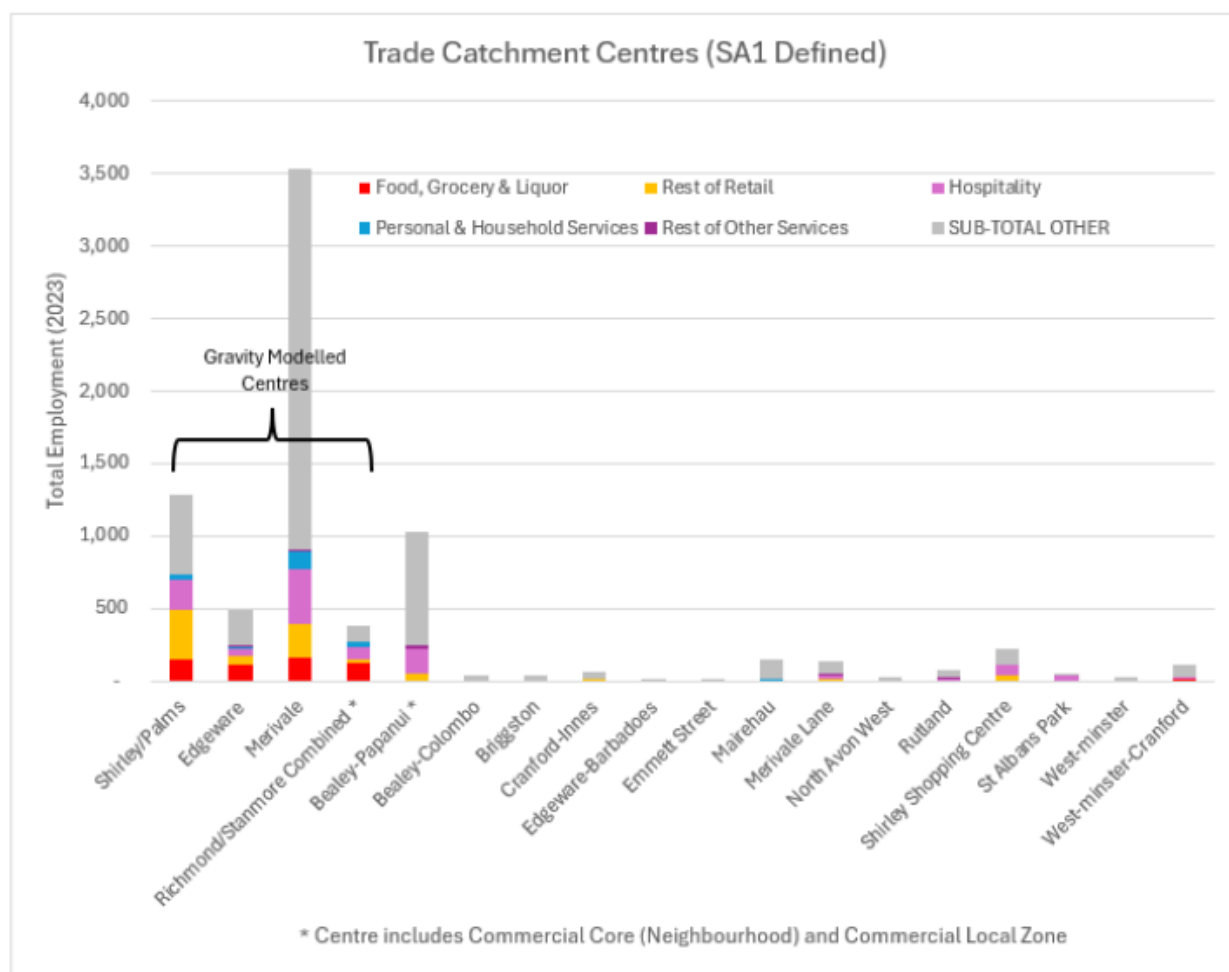


Figure 2 – Total Employment by Store/Business Type in Study Area Centres (2023)

37. Figure 2 shows that from an employment perspective, there is a reasonably clear distinction in the relative sizes of the local and neighbourhood centres, although there is variability within the centre types. The distinction between the Merivale (large) local centre and the Shirley/Palms town centre is less clear. In this case, Merivale has more food, grocery and liquor retail, hospitality and personal and household services employment than the higher-order town centre.
38. Of interest, while neighbourhood centres are intended to help meet the convenience needs of their immediate communities, and food and grocery is a key convenience retail need, only 4 of the 13 neighbourhood centres in the study area included one

or more food, grocery or liquor retail stores. The neighbourhood centres in the study area were far more likely to provide a hospitality role (particularly takeaways) followed by an “*other retail*” role.

39. This means that residents looking to do food, grocery and liquor convenience shopping in the study area are mostly limited to the larger local centres or town centre. Even then, the Bealey-Papanui local centre has just 7 people employed in food, grocery and liquor (minimal supply compared with between 117-162 employed in those store types in the other three local centres in the study area and 146 in the town centre). This highlights that even a local centre may not always meet the day to day grocery needs of its catchment community.¹¹
40. Enabling a particular economic role for centres through the District Plan does not mean that the market necessarily delivers that role effectively in all cases (or that centres adapt to the changing needs of their community in a timely manner). A prime example of this is the Belfast/Northwood town centre. This town centre was expected to serve northern Christchurch, but the zone sat vacant for a prolonged period of time and was then occupied by a retirement village. The town centre zone is now reduced (following PC14) to just over 1ha and contains only a New World supermarket. This is very different from the role and function of a town centre set out in Table 15.1 of the District Plan.
41. Some inefficiencies inevitably result in the centre network and hierarchy and some centres (where there is greater opportunity) will invariably pick up that latent demand. Flexibility (including a consent pathway) is needed in planning frameworks to account for this and help maintain accessibility to retail and service activity which is the core purpose of a centres-based planning framework.
42. The existing supermarkets in the indicative primary and secondary catchments I have modelled include a full-sized Woolworths supermarket in the Shirley/Palms town centre, smaller FreshChoice supermarkets in the Edgware and Merivale local centres and a full-service New World supermarket in the Richmond/Stanmore local centre.
43. The FreshChoice Edgware is the only supermarket that falls within the indicative primary catchment of the proposed development and is only small at around 950sqm. As discussed further below, it delivers more of a top-up grocery shopping role. This means that relative to the current and projected food, grocery and liquor store demand in the primary catchment that could expect to be met by a

¹¹ According to the data, the Bealey-Papanui local centre has a liquor store and butcher or fish shop, but no grocery stores or stores that sell fresh produce.

supermarket (as opposed to small specialist stores), the primary catchment is substantially under-served by supermarket floorspace.

44. While I have not included it in my centre analysis, the Home Base large format retail centre on the fringe of my indicative secondary catchment contains an Asian grocery store and a full-service supermarket has been consented. Similarly, there are a mix of supermarkets within the city-centre to the south of St Albans that are more distant for residents to visit (although may be closer to places of employment). With many of these located around Moorhouse Avenue being full-size, full-service supermarkets, some residents in the indicative primary catchment are highly likely to be driving to these stores to do their main-order (weekly) supermarket shop, despite the extra travel distance.
45. Overall, the supermarket offering in my defined study area has not kept pace with demand, particularly for those suburbs on the northern fringe of the city-centre such as St Albans. The centre network in the primary and secondary trade catchment has delivered just two full-service supermarkets (a Woolworths and a New World in the secondary trade catchment area (and a third consented right at the northern fringe)). I consider that this is creating inefficient supermarket shopping travel (with local spend leaking to more distant full-service stores). With further growth projected in the indicative primary trade catchment, these inefficiencies will continue to increase.
46. As discussed above, the St Albans neighbourhood centre is the last of the zoned centres in the primary or secondary trade catchments (other than Home Base discussed above) that is undeveloped and located on a vacant site. It therefore represents the only real opportunity to try and address some of the current and future leakage of full-service supermarket demand in the primary trade catchment to better support the economic wellbeing of the existing and future community.

Suitability of the Operative St Albans Centre Zone and Provisions

47. This section considers the anticipated retail environment for St Albans according to the District Plan. With above average recent growth rates in the indicative primary catchment and a total potential food, grocery and liquor market valued at around \$46m in 2023, I consider it highly relevant that the St Albans centre – a zoned opportunity – has not been developed to date. As discussed in my economic report,¹² I consider that the bespoke provisions of this centre combined with the unusual shape of the commercial zoned land (what's left after housing development in the corner) are key reasons for its long term vacancy (along with other challenges including the soil contamination, high water table and need for on-site stormwater attenuation).

¹² Section 2.1.

48. The operative St Albans Neighbourhood Centre Zone (**NCZ**) area:
- (a) Is an irregular shape that has been fitted around established land uses that existed at the time, and other developments that were planned on the block by past owners.
 - (b) Is further reduced on the Madras Street frontage by the development of four attached dwellings. Given that these dwellings are around 20 years old and of a size and form that matches current market demand in the area, it is considered unlikely that they would represent commercially feasible re-development capacity (i.e. if demolished so that the land could instead be used for neighbourhood centre development).¹³
 - (c) Has some narrow areas (joining onto Purchas Street and Packe Street) that are specified as accessways in the Outline Development Plan (**ODP**) for St Albans NCZ, thus further reducing the useable land area for commercial floorspace.
49. As such, I consider that the shape of the St Albans NCZ creates several constraints for development of a commercially viable neighbourhood centre. The key constraints are a narrow main frontage onto Madras Street combined with the main useable area and axis of the zone extending into the centre of the block. This may mean limited opportunity for some future business tenants of the Site to achieve good (or any) visibility for passing traffic, particularly those in Area A of the St Albans ODP. Visibility or profile is a key criterion for feasible retail development, and particularly for convenience retail.
50. I consider that the current zone shape strongly limits the suitability of the land for its intended purpose and note that “*suitability*” of business land is a key requirement for zoning in District Plans under the National Policy Statement on Urban Development 2020 (**NPS-UD**) (Policy 1(b)).
51. The St Albans NCZ has bespoke planning provisions in conjunction with the ODP that guides the location and scale of activity within the zone. As with the zone shape, the provisions gave effect to a specific proposed development in the past.
52. The bespoke provisions allow up to 3,500sqm GLFA of total floor space as a permitted activity, or exceedance of this a non-notified restricted discretionary activity (**RDA**). Setting aside the shape and useability of the zone, in terms of land area, St Albans is also one of the largest neighbourhood centres in Christchurch.¹⁴

¹³ I do however acknowledge that they are in single ownership, owned by Dragon Win Investments Limited who still retain ownership of vacant (L-shaped) NCZ land adjacent to the Site. This ownership may alter the probability of demolition to increase the useable size of NCZ in this corner of the block.

¹⁴ As shown in Appendix A of my economic report.

This permitted floorspace scale would put St Albans just beyond the upper limit GFA guide of neighbourhood centres (3,000sqm GFA) according to (my interpretation of)¹⁵ Table 15.1 of the Plan if all that floorspace was able to be realised.

53. While seemingly more enabling of total floorspace, the bespoke provisions are less enabling of an anchor retailer, limiting the largest store to 800sqm GLFA as a permitted activity rather than 1,000sqm GFA in other NCZs. Any exceedance is however still a RDA. A somewhat larger centre with a somewhat smaller anchor does not support a viable/feasible development outcome in today's market in my view.
54. An 800sqm supermarket anchor would be even smaller than the Edgeware FreshChoice (by around 150sqm). It would not satisfy demand for main-order supermarket shopping and would be limited to serving a top-up grocery role like Edgeware. This will do nothing to mitigate leakage of primary catchment full-service supermarket demand – with current and future residents likely to continue travelling to more distant full-service supermarkets to meet their weekly shopping needs. This does not represent an efficient urban form or a well-functioning urban environment.
55. The bespoke rules for the St Albans NCZ also provide for other (non-anchor) individual retail tenancies up to 450sqm GLFA,¹⁶ rather than 350sqm GFA in the general NCZ provisions (and this is also a non-notified RDA consent to exceed). This too is at odds with the intended outcome of convenience/neighbourhood centres under the Plan. Enabling larger tenancies (matching the threshold of large format retail)¹⁷ potentially reduces the number and mix of retail/commercial service stores that can develop, which would limit the functional (and social) amenity able to be delivered by the centre. It also potentially increases the risk of distributional effects on higher-order centres where larger retailers are more likely to be located.
56. In summary, St Albans was never anticipated to be an average or typical neighbourhood centre and would, if developed in accordance with the permitted rules and standards, not look or feel like any of the other 13 neighbourhood centres in my study area. However, the constraints created by the out-dated ODP – relative to the current and future demand opportunity - mean that there is a high risk that the land would not be developed as a neighbourhood centre under permitted or RDA rules and standards.
57. From an economic perspective, I consider that the commercial limitations of the operative provisions and zone shape make the Site unlikely to be commercially

¹⁵ I discuss the interpretation of Table 15.1 later in response to Mr Blair's S42A report.

¹⁶ The Property Economics Report incorrectly states 400sqm GLFA on page 8 of that report.

¹⁷ 450m2 is the minimum size for LFR in the Large Format Retail Zone which covers tower Junction and Homebase. 15.8.1.1(P2)(a).

viable and likely explain why the Site has remained vacant for so long. The ODP is outdated and does not effectively meet the needs of the community in this catchment, nor does it deliver the needs of a commercially viable centre development in today's retail environment. There is misalignment between what development outcome the planning provisions anticipate for the St Albans centre (without triggering a consent) and the market context in that location.

58. I note that the District Plan framework recognises the need for flexibility regarding the size and layout of this centre by providing a RDA consenting pathway, combined with an enabling policy framework for establishing commercial activities as part of the regeneration of residentially zoned brownfield land.

THE PROPOSAL

Scale

59. The size of the proposed development Site is only moderately larger than the size of the St Albans NCZ (i.e. is 34% larger than the gross NCZ area) but is of a different shape/configuration to facilitate a commercially feasible development outcome.
60. To achieve this, some brownfield land in the adjoining RMDZ in the block has been utilised in the design. This creates a regular shaped site with a wider road frontage, allowing carparking in the front of the building (which is preferable for supermarkets where practicable) and improved profile (visibility) for all potential businesses located on the Site. When examining commercial centres zoned across Christchurch City, maximising road frontage is a characteristic common across nearly all centres and is something the operative St Albans NCZ was disadvantaged by (with its longest axis heading in towards the centre of the block and with Area A unlikely to be visible for any passing vehicles once Area B was developed).
61. In terms of the proposed total GFA of the development – 4,700sqm GFA of total supermarket and ground-floor tenancies and approximately 530sqm GFA of first floor non-retail commercial space giving a total GFA of around 5,230sqm – this exceeds the permitted GLFA of the ODP by 1,730sqm¹⁸ and alternatively, exceeds my understanding of the policy guidelines for the size of neighbourhood centres generally¹⁹ by around 2,230sqm GFA. However, the size of standalone supermarket based centres that are neighbourhood centres is not quantified in the District Plan, and so that comparison with the Proposal is not possible.

¹⁸ Depending on how a centre that complied with the permitted rules and standards of the ODP for St Albans was developed, the GFA of that centre could be the same or higher than the GLFA. That is, while 3,500sqm GLFA is permitted, the GFA may be higher again. As this is unknown, I have compared Proposal GFA with anticipate GLFA, but the surplus floorspace should be considered a maximum.

¹⁹ Table 15.1, Policy 15.2.2.1 – Role of Centres.

62. In terms of total centre floorspace size, I consider that the Proposal is still relatively closer (commensurate) to the policy guidance GFA for neighbourhood centres than it is to the mid or upper limit of local centres (being a range of 3,000-30,000sqm).²⁰

Centre Role and Function

63. The role and function of the proposed centre and its relativity in the centre hierarchy is a key focus of the S42A report prepared by Mr Blair. It is a relevant consideration in a range of objectives and policies that apply to the application. I discuss this issue below and include my response to the Property Economics report on this issue at the same time.
64. I consider that the role and function of centres is determined by the combination of the following characteristics and not one characteristic in isolation:
- (a) the overall size of the developed floorspace (GFA);
 - (b) the number and range of businesses present – as functional amenity increases commensurate with the number and mix/range of retail and service providers; and
 - (c) the scale of the activities (with the scale of the biggest store usually determinative of the extent of the primary trade catchment),

Overall Centre Size

65. As discussed above, the overall size of the Proposal in floorspace terms is only moderately above the overall size anticipated by the St Albans ODP. The relative size of the Proposal (in a GFA sense) can be assessed in the context of Christchurch centres today but can also be considered in the context of Christchurch's centres over the medium term. This is because local and higher-order centres have been supported by housing intensification through PC14. Furthermore, most local and higher-order centres in Christchurch (especially those that are older like Edgware) could be developed more intensively than they are today. That is, they have growth potential through redevelopment. The housing intensification enabled by PC14 makes the redevelopment and intensification of centres more commercially feasible over time. As such, I expect many local and higher-order centres in Christchurch to be larger in the future (i.e. have more GFA). The effect of this will be a greater spread in centre hierarchy sizes (between the smallest and the largest centre), more or a range of sizes within each layer of the hierarchy (as centres intensify at different times), and likely greater separation between the relative size of neighbourhood centres and local and higher-order centres.

²⁰ I also assume this to be a GFA size guide, discussed later in my evidence.

66. The Proposal effectively maximises the efficiency of the Site. The sleeved tenancies are already 2 storeys and I don't anticipate that the building footprint could be increased further without loss of carparking (which is unlikely to be practical). So, St Albans is unlikely to get any bigger than the Proposal in the medium or long term,²¹ but other local and higher-order centres can. Taking into account the greater growth opportunity of local and higher-order centres enabled by PC14 further supports my view that the overall size of the St Albans centre is, and will continue to be, more commensurate with the size of neighbourhood centres.

The Number of Businesses / Functional Amenity

67. In terms of the number and range of businesses in the St Albans centres, the Proposal delivers a small group of convenience shops, consistent with the role and function of a neighbourhood centre. While unconfirmed, given their size and location it is reasonable to expect that one of the sleeved tenancies may be a café and one (or more) may be a takeaway food store. Hospitality is a key function of neighbourhood centres in the study area and I would expect the same for St Albans.
68. One of the proposed shops is the full-service supermarket. Supermarkets are anticipated activities and anchors in neighbourhood centres (as they are in all levels of the centre hierarchy), although many of the NCZs are too small to feasibly accommodate even a small supermarket. Mr Blair, with reference to the gross size of the St Albans NCZ of around 1.1ha, states that St Albans was anticipated to be a supermarket based neighbourhood centre.²² Supermarkets greater than 800sqm in the St Albans centre have a consenting pathway.
69. As discussed earlier in my evidence, The full supermarket that is proposed responds, in the only large vacant site remaining in the primary catchment, to:
- (a) the strong existing and projected demand for food, grocery and liquor retail (currently estimated at \$45m increasing to \$81m over the next 20 years in the primary trade catchment, the majority of which is expected to be met by supermarket floorspace); and
 - (b) the insufficient supply of supermarket floorspace in the primary catchment's existing centre network to meet that demand (limited to around 950sqm in Edgware), and specifically the absence of a full-service supermarket to meet demand for main-order (weekly) supermarket shopping.

²¹ I acknowledge that there is some residual NCZ that is vacant and not owned by the Applicant (Lot 3). If the proposed development is approved, I consider that Lot 3 would have relatively higher demand for medium density housing than demand for additional commercial development (particularly given the unusual and narrow shape of that residual area and the overlay of the ODP development areas). However, should Lot 3 be developed for commercial, the potential number of additional floorspace and tenancies (over and above the Proposal) is likely to be only small, and does not alter my conclusions.

²² Section 42A report, paragraph 193.

70. Importantly, because the Proposal only delivers a small group of convenience tenancies, the proposed St Albans centre will have only limited functional amenity and will not have the diversity or number of stores/business types or community facilities enabled and observed in most local centres in Christchurch, including in Edgware or the other study area local centres I have assessed.²³
71. I describe the activities present in Edgware in more detail in relation to submissions later in my evidence (and Annexure A). Specifically, I set out the mix and number of non-residential activities located in the Edgware Centre (zoned extent and adjoining parcels) and within 200m of the zoned area (that also deliver amenity to the community). There are 30 contiguous businesses based on my estimates in Edgware (plus 1 vacant tenancy and reasonable redevelopment potential that could provide more small-scale business opportunities in the future). The Proposal will support only a fraction of the potential number of businesses (including community facilities) that exist in Edgware today or that could exist in the future with further intensification of the centre.
72. Residents who shop at the Proposed centre will, because of its limited number and choice of stores, still need to shop at Edgware and other higher-order centres to meet their household needs. This is the foundation of a centres hierarchy – where neighbourhood centres complement (rather than compete) with local centres, and local centres complement town centres etc, and household, business and tourist demand is spread across the different tiers of the centre hierarchy commensurate with the different levels of functional amenity that they provide. I do not consider that the Proposal will undermine or jeopardise that hierarchy, instead it will complement it.

The Scale of Businesses/Tenancies

73. The third characteristic of a centres' role and function is the scale of its tenancies (and the mix of scales). I agree with Property Economics that the supermarket component of the Proposal (but not the other elements – being the sleeved small-scale retail tenancies) is of a scale that goes beyond a typical neighbourhood centre anchor store (and as a consequence of that, it draws from a larger catchment than a typical supermarket based neighbourhood centre). However, the function and role of a centre is not determined solely by the size of its anchor business.
74. On page 24 of the Property Economics report, they state that the *“new full-service Woolworths supermarket at St Albans, nearly four times larger in floorspace, would likely elevate its role beyond that of Edgware and other Neighbourhood Centres in the catchment”*. Firstly, the St Albans NCZ and ODP planning provisions already

²³ Footnote 20 also applies here.

set St Albans apart from other neighbourhood centres in the catchment in terms of zoned land area, total GLFA permitted and the size of non-anchor retail tenancies.

75. For the latter, the St Albans ODP enables retail activities up to 450sqm GLFA – essentially a cluster of almost large format retail stores (in addition to the 800sqm supermarket). Non-supermarket retail stores of this size need to draw spend from a broader catchment area to be sustainable (and are more typically found in town centres). I do not consider that such a development outcome would have been sustained just by the nearby residential area. As such, there is a disjoint in the District Plan between the expectation for neighbourhood centres (generally) to serve only the surrounding residential community and what retail activity was enabled in the St Albans ODP. In that regard, the proposed Woolworths catchment is not necessarily that different from the trade catchment that may have arisen from the anticipated outcome of the St Albans centre.
76. I disagree with Property Economics (and Mr Blair) that the scale of the Woolworths store alone will elevate the role of the St Albans centre above Edgware. It would not even have a role *equal* to Edgware or a local centre in my view. This is because while the supermarket might draw from a catchment commensurate with a full-service supermarket in an inner city urban area, the other characteristics of the Proposed centre (small number of total tenancies and relatively small overall size) means that the “centre” will have only limited functional amenity and will be commensurate with the role and function of a neighbourhood centre when considered as a whole.
77. Simply drawing in more customers from a larger catchment does not make St Albans a local or high-order centre if there is only limited additional convenience shopping that can be done in conjunction with that supermarket shopping trip.
78. My interpretation of catchment size is that it is loosely implied in the District Plan. No two centres will have the same sized or shaped trade catchment. A neighbourhood centre in an area of Christchurch where the centre network is relatively sparse will have a larger trade catchment than one in an area where the centre network is dense. A neighbourhood centre that contains a specialist store like the aquarium shop in the small Bealey Ave-Columbo Street NCZ²⁴ could potentially be serving an extensive area of Christchurch. There are many more examples that can be used to show that catchments across the centre hierarchy are complex and diverse and cannot be relied on (in the absence of other considerations) to determine the role and function of any one centre.

²⁴ Located within the primary trade catchment of the Proposal.

Overall Conclusions on St Alban's Role in the Centre Hierarchy

79. Centres – even within the same tier of the centre hierarchy - exist on a spectrum, as do the extents of their primary trade catchments. They evolve over time and many centres will grow up and out, as enabled within their zoned areas and as provided for by the policy framework of the District Plan.
80. When considering all of the relevant economic characteristics that define the role and function of centres across the centre hierarchy, I consider that the combination of a full-service supermarket and the small number of sleeved tenancies in the Proposal remains commensurate with the role and function of a neighbourhood centre within the broader centres hierarchy. I disagree with Property Economics and Mr Blair that the Proposal will achieve the same status as Edgware or a local centre generally in terms of the economic and social amenity it delivers to the community. Their assessment is focussed only on the scale of the anchor tenant and its associated trade catchment and not the other factors that contribute to a centres relative role and function.

EFFECTS ASSESSMENT

81. I have assessed the economic effects of the Proposal including adverse economic effects (being the potential for retail distribution effects on the existing centre network) and positive economic effects.
82. I provide a description of retail distributional effects and the relevant tests under the RMA in Section 5.1 of my economic report. The Property Economics report provides a similar discussion. I will not repeat that detail here, other than to say that in order to assess the risk of distributional effects, it is first necessary to isolate the direct trade competition effects arising from the Proposal, and then consider the scale and duration of those direct effects to determine whether they would lead (as a flow-on effect) to a significant loss of a centres' overall functional and social amenity.
83. I have applied a quantitative modelling approach to assess those direct trade competition effects and then further tested the model's outputs against my experience. I have used a specific food, grocery and liquor gravity model which has been calibrated to a 2021 base year. The calibration process finds the "best fit" between:
 - (a) the estimated annual residential, business and tourist spend generated in each SA2 across Greater Christchurch on food, grocery and liquor retail that is centre-based; with

- (b) the supply (sales) of food, grocery and liquor retail in centres in Greater Christchurch.
84. The model is constrained by distance-decay curves that represent the relative attractiveness of each centre to “pull” in spend. As food, grocery and liquor retail spend is convenience based, most distance decay curves are relatively tight. This means that the model tries (iteratively) to first match demand in each SA2 with the closest supply. Where food, grocery and liquor sales in a centre exceeds local demand, it means it is drawing additional demand from a broader catchment (more distant SA2s). Where food, grocery and liquor sales in a centre is less than local demand, it means that a portion of demand is being met elsewhere (more distant centres). The gravity model finds a match for the over and under supply – taking into account the road network and still seeking to minimise travel across the total market.
85. Once the model is calibrated for 2021,²⁵ growth in food, grocery and liquor retail spend in each SA2 can be entered into the model. This is driven by household and other employment/tourist growth projections at the SA2 level and assumptions around growth in real spend per household etc.²⁶ Holding the allocation patterns of demand across centres constant, shows how the food, grocery and liquor supply in centres may be expected to perform over time if there are no other changes in supply (that is, it shows projected sales growth). This is the baseline scenario against which the impact of the Proposal can be measured.
86. The proposed supply in St Albans (i.e. the Woolworths supermarket) is then entered into the model at the assumed first year of trading. The gravity model acknowledges the additional sales and reallocates demand in that year to match it – making adjustments so that the new supply can pull in sales from nearby SA2 and help minimise the distance between SA2 demand and centre supply across the whole market (i.e. improve efficiency). These re-calibrated demand and sales patterns are then assumed to hold constant in subsequent years (again, assuming no further changes in supply).
87. By comparing centre food, grocery and liquor sales performance over time in the baseline (without St Albans Woolworths) scenario and with St Albans Woolworths scenario, the direct impact of the proposed supermarket can be quantified for each existing centre.
88. As explained in my economic report, the gravity model uses a common employment metric to represent food, grocery and liquor sales and demand. The key benefit of

²⁵ There is an interim step when any known changes in food, grocery and liquor supply that occurred after 2021 (e.g. the new Pak’n Save north of the Northlands Town Centre) are manually entered in the appropriate year. The model is recalibrated to match demand to the adjusted supply.

²⁶ This is the same demand modelling described earlier in my evidence for the indicative primary trade catchment.

using an employment metric is that it avoids the difficulties of sourcing or estimating commercially sensitive sales of individual stores across the Greater Christchurch centre network. Robust employment data is published by StatisticsNZ so is readily available at the store type and centre level. There is also a strong correlation between store sales in the food, grocery and liquor sector and store employment. For all intents and purposes, the use of the employment metric does not alter the way that the gravity model functions, and it can be considered as a proxy for sales and demand dollars.

89. Figure 3 provides a summary of the gravity modelling results. The model shows results as of 2023, and every 5 years through to 2043. The proposed St Albans Woolworths is entered in the model from 2028 (assumed first year of trading) and can be seen on the far right of the graph. It is important to note that in the Christchurch City-Centre, supply that occurs across extensive mixed use and commercial zones has been aggregated spatially into “*Central City*” and “*City Centre South*”. The latter captures the multiple full-service supermarkets (and any other food, grocery and liquor employment) clustered around Moorhouse Avenue. The rest of the locations are discretely defined commercial centres.
90. The results do not specifically distinguish supermarket supply from other food, grocery and liquor retail supply in each centre – it is the aggregate total. However, the higher the total food, grocery and liquor employment in a centre, the more attractive it is considered to be. Each of the centres shown in Figure 3 (which are the main impacted centres) do contain one or more supermarkets (i.e. have high food, grocery and liquor sales/employment).
91. The two key columns to compare first in Figure 3 are the black columns – food, grocery and liquor retail performance in 2028 without the St Albans Woolworths, and the neighbouring orange column – 2028 performance with the St Albans Woolworths. This is the year on year impact – essentially the opportunity cost on food, grocery and liquor retail performance that may have been expected if not for the proposed Woolworths. It shows that a number (although not all) of these centres experience a very minor decrease in performance relative to where they might have been in 2028.

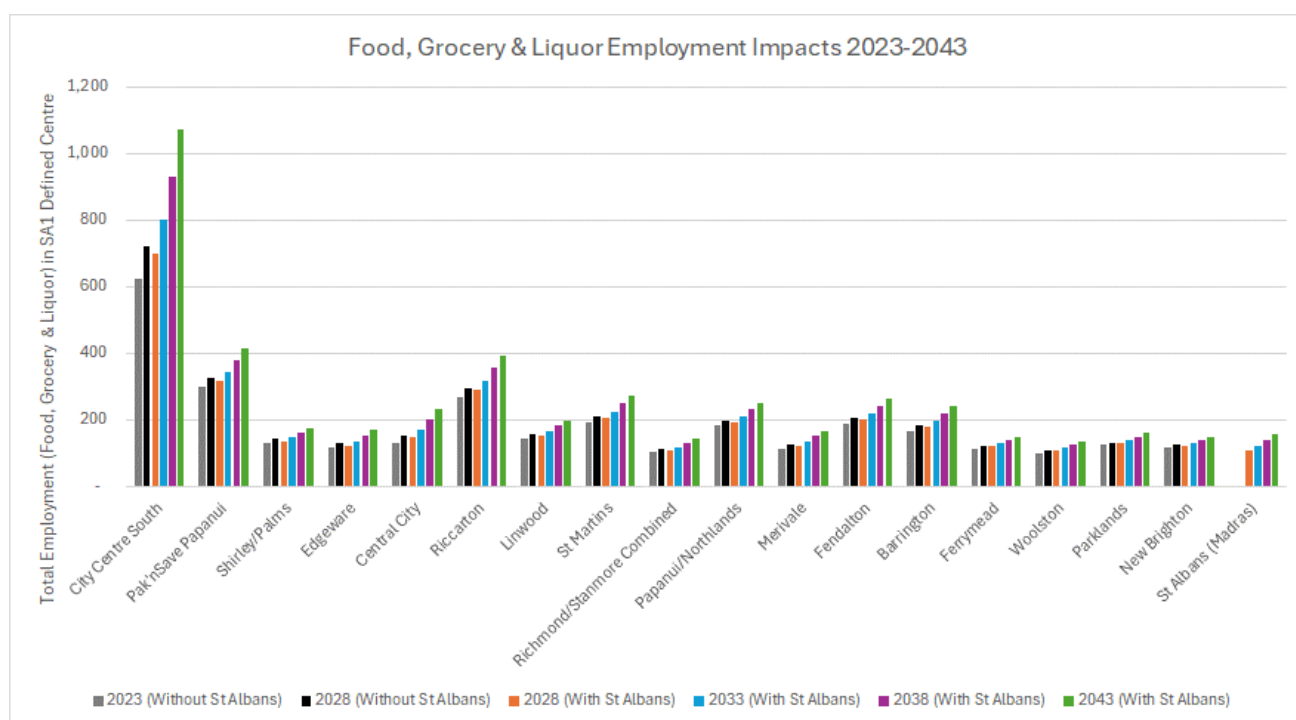


Figure 3 – Summary Results of the Food, Grocery and Liquor Retail Gravity Model (Main Impacted Centres Focus) 2023-2043

92. The next two columns to compare are the grey bars - 2023 performance without the St Albans Woolworths – and the orange bars - 2028 performance with the St Albans Woolworths. The gravity model shows that every centre, including nearby Edgware and Richmond/Stammore local centres, would have positive growth of food, grocery and liquor employment between 2023 and 2028, even with the addition of the Woolworths. So, while centres experiencing direct trade impacts may have slightly less employment than they might otherwise have had in 2028, they are still growing in supply. The reason for this is the growth of demand across these parts of Christchurch that is projected between 2023 and 2028.
93. The final columns to consider in Figure 3 are the blue, purple and green columns which represent projected performance in 2033-2043 with the St Albans Woolworths included in the market. These results show that all centres are projected to experience modest or strong food, grocery and liquor retail performance growth over the medium to long term, on account of projected household, business and tourist growth across Christchurch.
94. The gravity model confirms (within the limitations of the model) the supply-demand mis-match in the indicative primary catchment of the Proposal, as well as observed shopping patterns in Edgware local centre. That is, food, grocery and liquor retail demand in SA2s in and around St Albans (the northern fringe of the City-Centre) is

not being matched by food, grocery and liquor supply in those locations. Residents are travelling further to access full-service supermarkets in a range of other centre locations to carry out the majority of their spending (i.e. weekly shops). The corollary of this is that the direct trade impact of the proposed Woolworths store will be spread across a range of centres (diffuse), and those impacts on any one centre will be correspondingly minor.

95. Overall, the direct trade impact of the proposed Woolworths store on food, grocery and liquor performance in any centre in the study area ranges from 0% to no more than a 5% reduction in 2028 (for a without and with comparison in that year). These are very minor reductions. Those centres that would face relatively greater (but still minor) reductions are Shirley/Palms, Edgware and Richmond/Stammore (at a 5% reduction each in otherwise expected food, grocery and liquor performance from 2028 onwards) and the Central City and Merivale centres (at a 4% reduction each in otherwise expected food, grocery and liquor performance over the long-term).
96. Of key significance, relative to performance levels otherwise expected in 2028 in all centres (without the St Albans Woolworths), strong demand growth across the trade catchments of all centres means that the impact of the proposed Woolworths will be very short-lived, with all food, grocery and liquor retail performance in impacted centres exceeding the level they would have had in 2028 even before 2033, and continuing positive net growth into the future.
97. To put this into context, even in the Edgware centre where there would be an indicative reduction of 6 employment equivalents spread across the centre's food, grocery and liquor stores²⁷ in 2028 due to reduced spending in the centre, by 2033 not only would that reduction have been offset by projected growth in demand in its trade catchment (adjusted to accommodate the new St Albans centre), but it would sustain 5 more food, grocery and liquor employment equivalents than it would otherwise have had in 2028 according to the modelling. Employment (i.e. sales) in Edgware's food, grocery and liquor sector is projected (even with the St Albans Woolworths) to continue to increase between 2028 and 2043.
98. This projected employment (i.e. sales) growth in the centre may be manifest as busier, more productive food, grocery and liquor retail stores that can support additional staff, or new or expanded stores (potentially supporting redevelopment and intensification of commercial buildings where practical).
99. The gravity model results are a function of the undersupply of food, grocery and liquor supply in and around St Albans. Having run this same Greater Christchurch

²⁷ I.e., the direct trade impact may be shared across the FreshChoice, butchers, fruit and vegetable store, liquor store and sellers of bread/bakery goods.

model a number of times (adding supply in different locations), I know from experience that it is sensitive to the spatial patterns of supply and demand. Inserting the proposed Woolworths in St Albans is showing that it will re-capture spend leaking from those nearby SA2s that is being met by a range of more distant centres. If there had been ample food, grocery and liquor supply in and around St Albans (i.e. no leakage), then the model would have shown much higher impacts on that nearby supply. But this simply isn't the case in this instance.

100. Importantly, the results on performance impacts discussed above are only the direct trade competition effects of the proposed Woolworths on food, grocery and liquor supply in existing centres. In a resource consenting context it is only the degree to which those minor (or less than minor) and temporary reductions in performance potentially lead to wider reductions in total centre amenity, vibrancy and vitality that are relevant under the RMA. Based on the modelling results, I anticipate no such outcomes. The key reasons for my conclusions are:
 - (a) Direct trade impacts, while likely focussed on existing supermarkets, may be spread across other food, grocery & liquor businesses in each impacted centre, further minimising the impact on any one business.
 - (b) Any direct trade impacts are short-term/temporary because of projected residential demand growth within centre catchments. This ongoing growth mitigates any actual or perceived loss of vibrancy and vitality in centres.
 - (c) Reductions in performance (sales), particularly short-term and minor reductions shown, do not necessarily mean that businesses close. Businesses can respond to such impacts by reducing staff hours or perhaps reducing shop opening hours until demand returns to pre-impacted levels.
 - (d) The food, grocery and liquor retail sector is not the only sector that contributes to the overall amenity, vitality and vibrancy of impacted centres. Even in centres such as Edgware and Richmond/Stanmore where the food, grocery and liquor sector has a relatively more important role, a minor and temporary impact on that role would not be sufficient to materially affect the amenity, vibrancy and vitality of the centre as a whole.
101. While the Proposal is not anticipated to generate any distributional effects on the existing centre network (i.e. adverse economic effects), it is expected to deliver a range of positive economic and social effects.
102. The proposed development will realise a centre that has been anticipated (but not delivered) in that part of Christchurch for long time, providing a focal point for the local community and a substantial number of new jobs. This is a significant positive

effect for the surrounding residential neighbourhood. The improved amenity delivered by the centre may have a positive effect on nearby residential property values, which may in turn stimulate further housing redevelopment and intensification.

103. The Proposal will improve accessibility for current and future households to convenience retail and services (as well as choice) in that part of Christchurch and improve the overall efficiency of the Christchurch's urban form, including a reduction in vehicle kms travelled by primary catchment residents to meet their full-service supermarket shopping needs. The construction of the centre will also have a positive impact on the Christchurch construction industry, sustaining jobs and incomes over the construction period.

RESPONSE TO SUBMISSIONS

Edgware Centre – Site Visit

104. Potential for adverse socio-economic effects on the Edgware local centre was a focus for a number of submissions. Understanding (through desktop analysis) the current role and function of Edgware centre was a key focus of the Economic Report. Modelling the potential distributional effects on that centre was also a key focus (as discussed above).
105. I undertook a site visit to the Edgware centre on the 10th of June, spending several hours observing the centre, it's vibrancy and vitality, and the way that the community was using (i.e., deriving amenity from) the centre. My observations are focussed on a mid-morning through to early afternoon period and therefore are not representative of late afternoon (i.e. after school) or evening visitation (i.e. after work hours). Nor is it representative of weekend activity. However, the following provides a summary of my observations, and should be read in conjunction with Figure 4 below.



Figure 4 – Aerial Map of Edgware Local Centre and Environs

106. The centre comprises 27 businesses/tenancies within the zoned extent,²⁸ but a further 3 businesses operating on the boundary of the zone and therefore part of the centre (including a motel, kindergarten and community hall that is home to several clubs/associations)²⁹ and a further 12 business outside the zoned boundary but within 200m of the village centre and forming part of the Edgware centre wider environs. Those peripheral businesses include the new St Albans Community Centre, Dry Cleaners, car dealership, mechanics, dairy, takeaway, childcare centre, three visitor accommodation providers, a doctors, physio and chemist. In total, I consider that the centre has 30 contiguous business premises and the wider centre environs totals approximately 42 businesses, all within walking distance of each other.
107. There was just one vacancy where Harcourts had exited a tenancy in the Edgware Mall building. They now occupy a new two storey office building in the centre (Block A in Figure 4).
108. There was one new business “coming soon”. This was a café/restaurant located in Block F (Figure 4) opposite Harcourts and the BP service station. This shows that the centre is attracting new businesses and investment.

²⁸ Listed in Attachment A.

²⁹ The hall is home to the Scottish Society of NZ and is the base of the Christchurch Senior Citizens Association. Activities occurring at the hall include dance lessons, card game sessions, indoor bowls and monthly club meetings.

109. Each block within the centre provides a good amount of off-street parking. In conjunction with the street parking, I considered that the centre overall was an easy place to visit by car. I also observed many shoppers who had walked to the centre, and one shopper who was catching a bus after doing their shopping. There were multiple bus stops in or near to the centre.
110. The hospitality (café/restaurant/takeaway and bar) offering in the centre is strong, with two such businesses very strong performers on the day of my site visit. This was the food truck operated by the Peter Timbs butchery business which was particularly popular with tradies working in the surrounding area, and other 'workers' who appeared to have driven there specifically for lunch. The other was the café (Real) that is part of the Crisp fruit and vegetable/grocery store. This was full or nearly full for the duration of my visit.
111. I observed a local women's community group using the Real Cafe for their regular meeting. It highlighted the way that the centre delivered social amenity and facilitates community cohesion. I also observed one busker and two people begging in the centre. I observed multiple community members conversing with and donating money and grocery items to one of those people before she left the centre on foot.
112. Overall, the centre was busy, with a number of strong performing businesses. Peter Timbs operates a takeaway café, food truck and high quality butchery (in addition to an office) in the centre. The butchery appeared to be a real destination store and would be an asset in any centre. The same could be said for the Crisp and Real Café stores. While the immediate workforce of the centre is relatively small, the centre was attracting regular shoppers who appeared to be working nearby (either in construction or working from home businesses). The op-shop was also busy – serving a diverse mix of customers from students to young families and older residents. Those people that I met/talked to in the centre were very friendly and quick to recommend places to eat in the centre. For a relatively small centre, I found it to be vibrant and well supported by its catchment community,
113. I also paid particular attention to the FreshChoice store – observing shopper behaviour from a range of vantage points outside the store. I surveyed what customers³⁰ departing the store were carrying as an indication of whether they were doing “top-up” shopping (which is day-to-day shopping for a small number of items that may be carried out by hand, or in 1-2 bags), or doing “main-order” or “weekly” shopping (where shoppers typically exit with a trolley containing 3 or more bags that are typically loaded into a car).

³⁰ Excluding accompanying adults or children.

114. The FreshChoice is also home to the local Post Shop and Lotto Store and it was clear that one or both of those stores (and likely the Post Shop) was attracting a reasonable share (20%) of observed “shoppers” as these customers typically exited with nothing in their hands. In total, I recorded exiting shoppers between 10:30-11:30am, and again between 12:00-12:30pm, in 10 minute increments. This was a total customer count of 130 over those two periods, of which 80% (104) made purchases from the supermarket. Total customer flows for the building averaged 12 every 10 minutes between 10:30-11:30am, increasing to an average of 20 every 10 minutes between 12:00-12:30pm. Based just on the customer flows purchasing from the supermarket, these averaged 9 every 10 minutes between 10:30-11:30am, increasing to an average of 16 every 10 minutes between 12:00-12:30pm.
115. Figure 5 provides a summary of results, with the same data shown in a table in Annexure B. The data shows that 20% of visitors to the store left carrying nothing and were assumed to be visiting the post shop (or lotto store). A further 40% of customers exited the store with just a few hand-held items.³¹ Often this was a drink or bag of chips or similar. A further 36% purchased enough goods from the supermarket to fill one bag.³² Just 3% (4 out of 130 customers observed) exited carrying 2 bags of groceries.³³ 1 customer (just under 1%) exited with a trolley that contained 3 bags.³⁴
116. Overall, from my limited observations of the FreshChoice, I consider that the store (including the Post Shop) makes an important contribution to the functional (and social) amenity of the Edgware local centre. It had a steady flow of customers. While I did not observe the store during an after-school or after-work time period where main-order/weekly shopping might be expected to be more prevalent, my observations earlier in the day indicate that the supermarket’s role is largely limited to top-up grocery shopping. This observation is consistent with the size of the supermarket and with the findings of the desk-top analysis and gravity modelling which indicates that main-order (weekly) shopping demand is largely occurring elsewhere - in other centres that have full-service supermarkets.

³¹ Or 50% of customers that purchased from the supermarket.

³² Or 45% of customers that purchased from the supermarket.

³³ Or 4% of customers that purchased from the supermarket.

³⁴ Or 1% of customers that purchased from the supermarket.

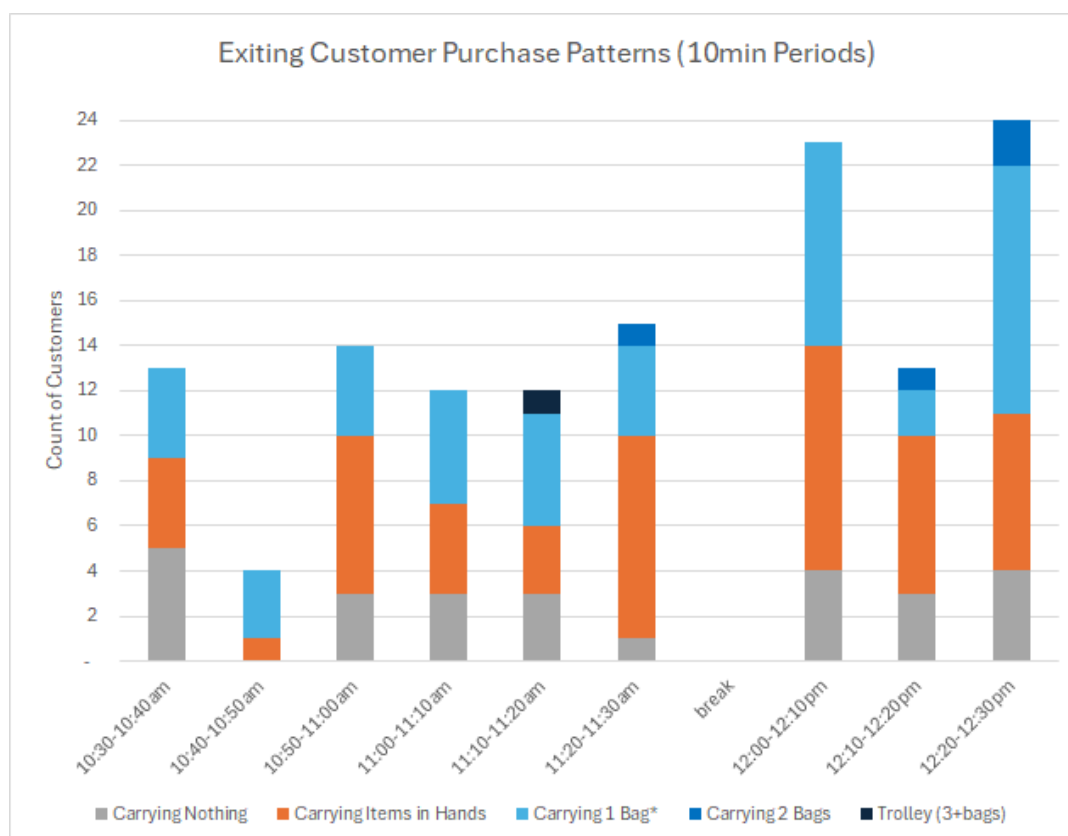


Figure 5 – Survey of Customers Exiting the FreshChoice Edgware (10th June)

Response to Submissions by Theme

117. The following sections of my evidence respond to key themes of submissions related to Edgware local centre.

Submissions Theme 1 – Proposal will have negative impact on FreshChoice

118. Several submissions³⁵ state concern that the Proposal will negatively impact or close down the FreshChoice supermarket in Edgware. Firstly, direct trade competition impacts on an individual store are not a relevant effect under the RMA which I understand will be addressed further by legal counsel for Woolworths. Notwithstanding that, for reasons stated in my Economic Report and evidence, I do not consider that the FreshChoice would be likely to cease operating as a result of the new Woolworths. Further, I consider that any direct trade impacts on that store would be minor and short term. The FreshChoice is functioning primarily as a large grocery store for top-up shopping. While the proposed Woolworths would also provide a top-up shopping role (likely limited to those closest to the new store (relative to the distance to the FreshChoice)), its core role is expected to be

³⁵ See for example submissions 25, 26

satisfying demand for main-order (weekly) supermarket shopping that is not being met by the FreshChoice.

119. The FreshChoice benefits from people working in or visiting the rest of Edgware Centre, who may need to purchase grocery items on that shopping centre visit (or while at work). It also potentially benefits from visitors to the Post Shop located inside the supermarket building. It was observed to have a regular stream of customers, albeit that the average purchase value of those customers was likely relatively low. Continued housing intensification within the FreshChoice trade catchment (even adjusted to account for the proposed Woolworths store) is expected to sustain future growth in the stores' performance. Overall, I do not consider that the Proposal presents a material threat to the ongoing viability of the FreshChoice in the Edgware local centre.

Submissions Theme 2 – Proposal will have negative impact on Edgware Centre and Business Viability

120. Many submissions³⁶ stated concerns that the Proposal will adversely impact or undermine businesses more generally in the Edgware local centre (not limited to the FreshChoice) that support the local community. Concerns included causation of vacant derelict spaces, job losses, creation of a ghost town, negative effects on smaller food and grocery retailers (like Peter Timbs and Crisp). Some considered the competition to be unfair.
121. It is noted that Submission 43 considers that Edgware is a thriving community shopping village. Based on my observations, I would agree that the centre as a whole is doing reasonably well for its size and current activity mix.³⁷ A centre that is well supported by its local catchment is likely to be relatively resilient to increased competition from a new and nearby centre, particularly one that is expected to provide only limited overlap of like-for-like retail and service stores and is smaller in total size (being 74% of the size of the zoned LCZ in Edgware or 63% if you include the zoned and contiguous commercial land parcels in Edgware that form part of the centre proper).
122. It is important to remember that the District Plan already anticipates (as a permitted activity) 3,500sqm GLFA of retail and service activity in the St Albans NCZ, including a small supermarket and potentially a number of 450sqm retail outlets, or conversely a larger number of small-scaled shop tenancies (i.e., many more than proposed with

³⁶ See for example submissions 1, 2, 8, 11, 13, 17, 19, 27, 28, 36, 41, 42, 43, 55, 56, 57, 62, 63, 64, 72, 73, 79, 92, 93, 95 and 101.

³⁷ There is still potential to increase the functional and social amenity of the Edgware local centre and maximise the efficiency of the zoned land resource – with some current occupiers of the zone not contributing to the functional amenity of a 'shopping centre'.

the Woolworths). The Plan also provided for more floorspace in the NCZ as a RDA. I consider that many of the concerns raised by submitters are effects that are already deemed acceptable by the District Plan or are not relevant concerns under the RMA.

123. My analysis, gravity modelling and site visit specifically considered the potential for distributional effects on the Edgeware local centre as a whole and I consider that the Proposal will not lead to any significant effects on Edgeware's viability or vitality. The Edgeware and St Albans communities are growing with continued residential redevelopment and infill. The Edgeware local centre will benefit from that growth and this will offset any minor impacts caused by the Proposal.
124. The Proposal is expected to re-capture main-order supermarket shopping trips that were being directed to other more distant centres. It is likely that some other retail and service spending was also leaking from the Primary catchment in conjunction with those supermarket trips. The Edgeware local centre may benefit from more household spend occurring in the Primary catchment given that the Proposal includes only a few retail and service tenancies in conjunction with the Supermarket and so will only have limited functional amenity (commensurate with a neighbourhood centre).
125. With regard to potential impacts on Peter Timbs butchery and Crisp fruit and vegetable store, these stores appear to be thriving in conjunction with the FreshChoice directly over the road. From appearances the butchery looks like it would have an excellent reputation and I expect it is drawing customers from a wide catchment. I consider them two of the strongest retailers in Edgeware and I do not consider that the Proposal will have a material impact on their customer bases.

Submissions Theme 3 – The Proposal Unnecessarily Duplicates Activity

126. Several submissions state concerns that the Proposal unnecessarily duplicates services already provided at Edgeware local centre.³⁸ They state that the existing supermarket is sufficient and that there are already enough shops in the area to meet community needs. The opposite is true in my view. The Primary catchment is missing a full-service supermarket and the Proposal directly responds to that gap in the market. The FreshChoice is not meeting the needs of all members of the community and this is resulting in more travel to meet supermarket needs. Submission 77 recommends that a quick access (small top-up) supermarket would be more beneficial for the community. I disagree for reasons set out in my evidence. This outcome – effectively the outcome sought by the ODP provisions for St Albans limiting a supermarket to 800sqm GLFA – would not meet community needs and would maintain current inefficiencies in urban form.

³⁸ See for example submissions 5, 6, 59, 61, 70 and 92.

127. The District Plan anticipated more shops in the St Albans community. What retail and service stores the Proposal will duplicate (other than a supermarket of a different size and role than the FreshChoice) is not yet known, but those tenancies will be small scale and limited in number. As such, any potential “overlap” will be minor (given that Edgeware centre has 30 contiguous business premises across a range of commercial and community activities).
128. It is also important to consider the needs of the future community, which will be larger than the community here today. The proposed supermarket is of a suitable size to meet current and future demand in the Primary trade catchment.

Submissions Theme 4 – The Proposal will Have Negative Social Impacts

129. Several submissions raise concerns that the Proposal will have negative effects on the Edgeware community, or that the development lacks community connection, or will erode community social networks and destroy social cohesion.³⁹ Contrary submissions⁴⁰ consider that the Proposal will improve the quality of the local community, will benefit young families, provide jobs and remove a site that has been an eyesore for the local community. The submissions claiming negative social effects are primarily basing this on the loss of businesses in the Edgeware centre that currently contribute to the community (functionally and socially). I have addressed the potential for the Proposal to have distributional effects on the Edgeware centre and have found that economic effects are unlikely to reach the threshold that will result in significant adverse effects on the commercial viability of businesses in Edgeware, or the centres overall vibrancy and vitality. As such, I do not agree that there is a risk of negative social impacts.
130. I consider that the Proposal increases the functional amenity delivered to the Primary catchment community overall – with no closures of existing stores anticipated, but new stores both sustainable and adding choice and a greater range for residents. Centres also provide places for social interaction and provide a focal point for a community, adding to a sense of place. The Proposal will not replace the needs for residents in the Primary catchment to shop and visit Edgeware local centre. Rather, it will reduce the time and distance that current and future residents need to travel to access a full-service supermarket.

³⁹ See for example submissions 1, 39, 40, 45, 57, 61, 67, 70, 97 and 101.

⁴⁰ See for example submissions 44, 49, 50 and 53.

Overall Evaluation of Submissions

131. Having read the submissions that focus on economic and social effects of the Proposal, I still maintain my conclusions that the Proposal will provide a range of positive economic and social effects for the Primary catchment community, and no adverse distributional economic and social impacts. The submissions speak highly of the amenity, and particularly social amenity, delivered by the Edgeware local centre. This matches the observations from my brief site visit.
132. I do not consider that the Proposal will threaten the role of the larger and more diverse Edgeware local centre. In terms of:
- (a) the number of business/tenancies provided for in the design;
 - (b) the scale and associated limited range of the non-supermarket tenancies; and
 - (c) the overall scale (GFA) of the total development
133. I consider that the Proposal is commensurate with the role of a neighbourhood centre. While the scale of the supermarket anchor is greater than anticipated by the Plan in the NCZ, and St Albans ODP specifically, it delivers a store commensurate with current and future demand in the primary catchment that is not practicable to deliver in the Edgeware local centre (or if hypothetically enough sites could be amalgamated, would be to the detriment of the number and mix of businesses in that centre which many submitters are passionate about maintaining).

RESPONSE TO SECTION 42A REPORT

Economic Assessment by Property Economics

134. I have read the Property Economics report prepared for the S42A officer. There is substantial alignment in our findings that the Proposal is economically sustainable and appropriate in the local market context and would not cause any significant adverse effects on the surrounding centre network. There are some differences in the data and approaches applied by Property Economics and in my economic report. To assist the Panel, these include:
- (a) Property Economics define a larger primary (core) trade catchment for the Proposal (a comparison is provided in Figure 1 of this evidence), with a corresponding higher resident population and household count.
 - (b) Property Economics used a projection of 14 years (and a 2024 baseline) compared with my 20 year projection (and a 2023 baseline). In both of our

assessments, growth can be expected to continue beyond these horizons (although slowing down gradually over time).

- (c) Property Economics used Council's population and household projections, while I used StatisticsNZ based projections.⁴¹ The Council projections show considerably less household growth in this city fringe location than StatisticsNZ projected (and relative to recent dwelling consent trends). Property Economics do state that they consider the projections may be too conservative in light of the recent intensification plan change (PC14).
 - (d) Property Economics have a higher average annual spend per household in their primary catchment on food, grocery and liquor retail than I have used.⁴² However, when combined with their lower household growth rate, we end up with a very similar amount of total demand growth to 2038 (albeit that their demand growth relates to a larger primary catchment, so is still more conservative than my primary catchment estimates).
 - (e) Property Economics provide a qualitative assessment of distributional effects while mine is informed by a quantitative (gravity) model. However, both of our assessments consider that direct trade impacts will be diffuse (across a number of supermarket-based centres) and not result in any distributional effects on existing centres, including Edgware.
135. We agree that the Site is appropriate for a supermarket development. We agree that other centres within the catchment lack capacity to accommodate a new full-service supermarket. We also agree that demand for supermarket activity in the primary catchment is only going to grow over time. We agree the Site represents the only practicable opportunity to reduce supermarket leakage in the catchment and that providing for a full-service supermarket would generate economic and urban form efficiencies and would not undermine the role, function, vibrancy or vitality of any existing centre, including Edgware.

Effects on the Planning Framework

136. Property Economics agree that the proposed Woolworths is necessary in the primary catchment and that the benefits outweigh the costs on balance but state that the store's primary trade catchment (as defined by them) exceeds the trade catchment extent anticipated by a neighbourhood centre and that this alone elevates

⁴¹ The report provides no further explanation of the Council's projections. For example, it is not known what these represent at the total district level, what projection series they are (i.e. low, medium or high), and where else Council has relied on these projections.

⁴² Property Economics and I use the same two ANZSICs to represent the food, grocery and liquor retail market.

its role “*beyond that of a typical neighbourhood centre*”. I have explained why I disagree with that finding earlier in my evidence and do not repeat that here.

137. Property Economics do not anticipate any adverse economic effects associated with an elevated status other than effects on the “*integrity*” of the commercial centre hierarchy in the Plan and the “*coherence*” of the planning framework. They also raise potential for a precedent effect, presumably for other neighbourhood centre zones to apply for RDA supermarkets above 1,000sqm and/or expand outside of the zoned area. I discuss these findings briefly below.

Plan Integrity

138. While plan integrity is primarily a matter for planning experts and legal counsel to address, I address below some brief comments on my view on plan integrity risks as they relate to economic matters.
139. The centre hierarchy in Christchurch contains around 170-180 centres (excluding mixed use zones). Given the inherent flexibility that the District Plan provides for centre development across that hierarchy, it is difficult to see how moderately expanding a zoned neighbourhood centre and allowing for a larger than anticipated supermarket could materially undermine the integrity of that centre hierarchy, particularly when it is agreed that there are no adverse effects on the role or function of any other centre.
140. As explained above, I do not consider that the Proposal changes the role or function of the St Albans centre beyond a neighbourhood centre when all factors are considered. As such, I do not consider that there is any adverse effect on the integrity of the District Plan or the coherence of the planning framework and centre hierarchy as concluded by Property Economics.
141. Even if the Panel determined that there was a Plan integrity effect, I agree with Property Economics that avoiding this intangible effect should not be at the expense of the tangible net economic benefits of the Proposal to the community (which we both agree the Proposal delivers).

Precedent Effect

142. While Property Economics (and Mr Blair) raise the issue of the Proposal (if approved) setting an unexpected precedent for similar scale developments in other lower-tier centres, they provide no examples of where this might reasonably be realised.⁴³ As stated earlier in my evidence, vacant zoned centres in existing urban areas are rare. Vacant (brownfield) medium density residential land adjacent to

⁴³ Mr Blair’s S42A report briefly raises precedent effect in paragraph 216.

vacant zoned centres in existing urban areas is even more rare. Using GIS, I have reviewed all neighbourhood centres in Christchurch (excluding NCZ in greenfield priority areas that have not yet had material residential development) and found the following.⁴⁴

143. The results range from neighbourhood centres that only have vacant land within the NCZ remaining, to centres that only have vacant residential land adjoining the developed NCZ remaining, with just 3 neighbourhood centres (excluding St Albans) that have both vacant land within the NCZ and in the adjoining residential zone.
- (a) 2 wholly vacant NCZ in greenfield growth areas and 2 vacant NCZ in an existing urban area (Major Hornbrook Road⁴⁵ and southern corner of Barbadoes and Kilmore Streets) with no vacant lots adjoining the NCZ. Intensification on vacant land but no feasible expansion opportunity.
 - (b) 3 partially developed NCZ with 1-2 vacant NCZ zoned lots remaining in each (Lincoln Road, the northern side of the Barbadoes and Kilmore Street intersection and Bowhill Road). No vacant surrounding lots. Intensification on vacant land but no feasible expansion opportunity.
 - (c) 1 mostly vacant NCZ in a greenfield growth area where there is still some vacant suburban residential zone land adjoining the NCZ site (190 Awatea Road)⁴⁶ and 2 partially vacant NCZ in the existing urban area with one or more vacant residential zoned lots adjoining the NCZ (corner of Barbadoes and Armagh Streets and corner Bowhill Road and Marine Parade). Intensification on vacant land and limited feasible expansion opportunity.
 - (d) 1 developed NCZ with 1-2 vacant suburban residential zoned lots to the rare (345 Halswell Road) and another with 2 vacant medium density residential zoned lots to the side (175 Wainoni Road).⁴⁷ Some feasible expansion opportunity only.
144. In terms of those neighbourhood centres that could (if consented) expand onto adjoining residential lots (d above), the vacant residential areas for those centres range from 1,200-2,920sqm. Neither of these would be likely to support a supermarket greater than 1,000sqm (if able to be approved). In terms of those neighbourhood centres that could (if consented) utilise vacant land or redevelop the

⁴⁴ While I have not examined it, there may also be commercially feasible examples where residential dwellings adjoining a NCZ could potentially be purchased and demolished to create expansion opportunity – this is however challenging and costly to achieve.

⁴⁵ This site was the subject of a resource consent in 2024.

⁴⁶ Houses have already started developing on the periphery of this residential block (although without and sealed road or driveways which is odd). In reality, this land is expected to be committed to residential development.

⁴⁷ This NCZ is opposite a LCZ that contains a Pak'n Save.

NCZ and utilise the adjoining vacant residential areas (c above), those combined areas range between 1,410-13,790sqm. The upper limit relates to 190 Awatea Road where that vacant residential land next door is potentially already being developed for housing so seems unlikely. Excluding Awatea, the areas range from 1,410-3,705sqm. Neither of these would support a supermarket (if able to be approved) greater than 1,000sqm.

145. Overall, none of the neighbourhood centres listed above are of a scale or dimensions that would, even with adjoining vacant land expansion opportunity, provide a site suitable for a full-sized supermarket by my estimates (and assuming that a full-sized could be sustained in those locations without causing significant distributional effects). I therefore consider the risk of the Proposal creating a precedent effect to be negligible. Even so, should the Panel determine that there was a precedent effect, I agree with Property Economics that avoiding this effect should not be at the expense of the net economic benefits of the Proposal to the community

Mr Blair's S42A Report

146. At paragraph 100, Mr Blair concludes that as there will not be economic effects of any note that would lead to a decline of the Edgeware Centre, any adverse social effects will be at worst minor. We are therefore in agreement on the substantive economic and social effects of the Proposal – that they will be insignificant.
147. While I don't consider it a substantive matter, the following is relevant to how I have considered the overall size of the Proposal (as discussed earlier in my evidence). As such, I provide brief comment on the following.
148. At paragraph 192, Mr Blair provides interpretation of the description of neighbourhood centres in Table 15.1 Policy 15.2.2.1. He states that the reference to the size of neighbourhood centres (up to 3,000sqm) is a reference to the zone area and not the GFA anticipated in the centre, as is the case for the description of local centres in that same table. This was not how I had interpreted it, as I had assumed this was a GFA guide and not an absolute.
149. By my estimates around 60% of NCZs in Christchurch are less than 3,000sqm (0.3ha) in zoned area, but a substantial 40% (approximately) are much larger.⁴⁸ This suggests substantial misalignment with the policy guide if it is zone area based, or that around 40% of neighbourhood centres (around 50 in total) were intended as *"standalone supermarket based centres"* larger than 0.3ha. While the use of *"GFA"* is included in the description of local centres (i.e. 3,000-30,000m² GFA), *"GFA"* is also not added to the size of town centres in Table 15.1 (i.e. Greater than 30,000m²).

⁴⁸ Refer Appendix A of the Economic Report (although noting that a small number of centres may have been reclassified as a result of PC14).

By Mr Blair's logic, NCZs and TCZs are defined by their zone area, with TCZ being greater than 3.0ha, and only LCZ are defined by their GFA.

150. It seems to me that the size ranges of NCZ, LCZ and TCZ were intentionally sequential as follows:

- (a) NCZ – Up to 3,000m² (excluding standalone supermarket based centres);
- (b) LCZ – 3,000-30,000m²; and
- (c) TCZ – Greater than 30,000m².

151. With that in mind, it seems more logical to me that all three size references were intended as GFA guides. I stand to be corrected on this matter, but in any event, I have similarly assessed the size of the Proposal Site relative to the zoned NCZ and concluded that the net increase was only moderate.

CONCLUSION

152. I have provided a comprehensive assessment of the relevant economic effects of the Proposal, including a response to the economic effects stated by Property Economic and Mr Blair (where these differ from my expert opinion). Based on my assessment, I consider that the Proposal will still ensure that the St Albans Centre is commensurate with a neighbourhood centre in the centre hierarchy and will have no impact (distributional effect) on the role and function of any other centre in Christchurch.

153. I do not consider that the Proposal undermines the integrity of the District Plan's centres hierarchy or creates a precedent effect for the development and growth of other neighbourhood centres. The Proposal will create a focal point for the surrounding residential community, create employment and improve access to convenience retail while still complementing the larger and more diverse Edgware centre.

154. I consider the Site an appropriate location for a full-service supermarket sitting within the catchment it will serve. This component of the Proposal will ensure a more efficient urban form by meeting local demand for a full-service supermarket, reducing supermarket shopping travel to a range of more distant full-service supermarkets. Overall, I consider that the Proposal delivers significant positive economic effects and no material adverse economic effects. From an economic perspective, I therefore consider that it is appropriate for consent to be granted.



Natalie Dianne Hampson

18 July 2025

Annexure A

Edgware Centre Tenancy Description

The following is a description of tenancies within the Edgware Local Centre Zone and does not include business that form part of the centre or environs that sit outside of the zoned extent. The block references are shown in Figure 4.

Block A:

- Harcourts Office (Real Estate)

Block B:

- 3 x ethnic restaurants open for lunch, dinner and takeaway
- St Johns Second Hand Store
- Vacancy (ex Harcourts tenancy) (also noting the 'mall' is unutilised space)
- Big Bites (pizza takeaway)
- Butchers Kitchen (takeaway – run by Peter Timbs)
- Office (Peter Times head office)
- Food Truck (run by Peter Timbs)
- Peter Timbs Butchery
- Crisp fruit and vegetable store/specialty grocer
- Café and real fruit ice cream (part of Crisp store)
- Ma Baker (bakery and café)
- Bailies English Bar and Restaurant
- Wood Merchant and show home (health based building). Large site with warehousing and offices.

Block C:

- Liquor Store
- Vape Store
- Takeaways
- Pharmacy
- Second Hand Book Shop

Block D:

- Café and bakery
- FreshChoice, including lotto
- Post Shop (inside FreshChoice)

Block E:

- BP petrol station, with car wash and wild bean café

Block F:

- Restaurant/café (opening soon)
- Office (professional service)
- Residential property
- Homewares/furnishing shop (may be closed, converted reside

Annexure B

Edgware FreshChoice Survey Data

Time Period	Carrying Nothing	Carrying Items in Hands	Carrying 1 Bag*	Carrying 2 Bags	Trolley (3+bags)	Total Customers (excluding accompanying adults or children)
10:30-10:40am	5	4	4	-	-	13
10:40-10:50am	-	1	3	-	-	4
10:50-11:00am	3	7	4	-	-	14
11:00-11:10am	3	4	5	-	-	12
11:10-11:20am	3	3	5	-	1	12
11:20-11:30am	1	9	4	1	-	15
<i>break</i>						
12:00-12:10pm	4	10	9	-	-	23
12:10-12:20pm	3	7	2	1	-	13
12:20-12:30pm	4	7	11	2	-	24
Total Observed	26	52	47	4	1	130
Share of Observed	20%	40%	36%	3%	1%	100%

Observations of FreshChoice Edgware, 10th June 2025. * Some customers exited with full back packs or walking trundlers and were observed walking out of the centre. These customers were counted as 1 bag customers.