

**NOTICE OF SUBMISSION TO THE PROPOSED WAIMAKARIRI DISTRICT PLAN
PURSUANT TO CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE
MANAGEMENT ACT 1991**

To: Waimakariri District Council
Private Bag 1005
Rangiora 7440

Via email: developmentplanning@wmk.govt.nz

Submitter:



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A. INTRODUCTION

Z Energy has business interests within the Waimakariri District.

Z Energy is a publicly listed company on the Australian and New Zealand stock exchanges with around 10,000 shareholders.

Z Energy's primary business includes a fuel retail network, pipelines, terminals and bulk storage terminal infrastructure situated around the country.

Z Energy supplies fuel to retail customers and large commercial customers like airlines, trucking companies, mines, shipping companies and vehicle fleet operators. It also provides bitumen to roading contractors.

Z Energy owns and manages:

- a 15.4 per cent stake in Refining NZ which runs New Zealand's only oil refinery;
- a 25 per cent stake in Loyalty New Zealand which run Fly Buys;
- approximately 200 service stations;
- about 140 truck stops; and
- pipelines, terminals and bulk storage terminal infrastructure around the country.

In June 2016, Z Energy also purchased the assets of Chevron New Zealand, which sees Z Energy as the wholesale fuel supplier to the network of Caltex-branded service stations. Most of the Caltex-branded retail network remains independently owned and operated, with the operators setting their own retail fuel prices.

Z Energy has three assets in the Waimakariri District relate, being:

- Z Rangiora Service Station;
- Z AS Rangiora Airfield
- Z Waikuku Service Station

Z Energy's individual service station and truckstop networks are important to the social and economic success of the district. It is important that the management of these networks are appropriately addressed in the Proposed Waimakariri District Plan (*PWDP*) in order to ensure fuel supply for the district and beyond. The *PWDP* addresses a wide range of topics. This submission is focused on those issues that Z Energy perceives may inappropriately restrict or limit its existing operations. Broader environmental management concerns and concerns relating to the management of terminal assets are addressed in a separate submission.

B. THE SPECIFIC PROVISIONS OF THE WAIMAKARIRI DISTRICT COUNCIL'S PROPOSED DISTRICT PLAN THAT THIS SUBMISSION OF Z ENERGY RELATES TO ARE SUMMARISED AS FOLLOWS:

This submission by Z Energy relates specifically to the *PWDP*.

This submission addresses a range of site-specific matters pertaining to the zoning provisions applicable to Z Energy's retail & commercial base within the Waimakariri District. It also addresses the proposed transport provisions.

The specific matters submitted on, the rationale for Z Energy's submission on each of the matters, and the relief sought, is described in the following Schedules A to D inclusive.

- C. Z ENERGY WISHES TO BE HEARD IN SUPPORT OF THIS SUBMISSION**
- D. IF OTHERS MAKE A SIMILAR SUBMISSION, Z ENERGY WOULD BE PREPARED TO CONSIDER PRESENTING A JOINT CASE AT ANY HEARING.**
- E. Z ENERGY COULD NOT GAIN AN ADVANTAGE IN TRADE COMPETITION THROUGH THIS SUBMISSION.**

Signed on and behalf of Z Energy Limited as authorised signatory

A handwritten signature in blue ink, appearing to read "Joy Morse", is positioned above the printed name.

Joy Morse

Dated this day of 26 November 2021

SCHEDULE A

Z RANGIORA

A1. PROPOSED ZONING AND ZONE PROVISIONS APPLYING TO Z ASSETS SUBJECT OF THIS SCHEDULE

- Zoning maps for Z Rangiora at 286 High Street, Rangiora (legally described as Lot 2 DP 69751), and associated zone provisions.

A2. THE SPECIFIC PARTS OF THE PWDP THAT ARE SUBJECT OF THIS SUBMISSION

- Zoning of the Site as Town Centre Zone
- Policy TCZ-P1 and TCZ-P2
- Rule TCZ-R1
- Rules TCZ-R19
- Built Form Standard TCZ-BFS1 to TCZ-BFS7 and TCZ-BFS9

A3. SUMMARY OF POSITION

- **SUPPORT** – the zoning of the Z Rangiora Service Station as Town Centre Zone, as shown on the PWDP Planning Maps.
- **OPPOSE** – the lack of recognition that existing service stations have functional and / or operational design requirements that preclude them from meeting the specific urban design standards of the Town Centre Zone, in TCZ-P2.
- **SUPPORT** – the provision for service stations in the Town Centre Zone as a permitted activity, in Rule TCZ-R19.
- **SUPPORT** – the provision of *new* service stations within 30m of Residential Zones as a restricted Discretionary Activity, in Rule TCZ-R19(1).
- **SUPPORT** – absence of the 'Principal Shopping Street' overlay affecting Z Rangiora, despite other sites within the locality being affected.
- **SUPPORT** – the provision for the construction, alteration or addition to buildings or other structures in the Town Centre Zone, in Rule TCZ-R1.
- **SUPPORT** – the provision for a maximum building height of 12m, in Rule TCZ-BFS1(2).
- **SUPPORT** – the provision for height in relation to boundary standards when adjoining Residential Zones, in Rule TCZ-BFS3.
- **SUPPORT** – the provision for internal boundary setback standards when adjoining Residential Zones, in Rule TCZ-BFS4.
- **OPPOSE** – the application of internal boundary landscaping standards where fencing is not provided as an alternative means for screening, in Rule TCZ-BFS5.
- **OPPOSE** – the application of road boundary landscaping standards without exemption for additions and alterations to existing service stations, in Rule TCZ-BFS6.
- **OPPOSE** – the application of building road boundary setback, glazing and veranda standards without an exemption for additions and alterations to existing service stations, in TCZ-BFS7.

- **OPPOSE** – the application of outdoor storage area screening standards without an exemption for additions and alterations to existing service stations, in TCZ-BFS9.
- **OPPOSE** – the application of landscape requirements for carparking without exemption for additions and alterations to existing service stations, in TCZ-BFS9.

A4. REASON FOR SUBMISSION

- 1.1 The Z Rangiora Service Station is located on the corner of High Street and King Street, Rangiora. The below excerpt from the PWDP Planning Maps shows the proposed zoning and overlays for the site, as follows (site highlighted in black and white outline):

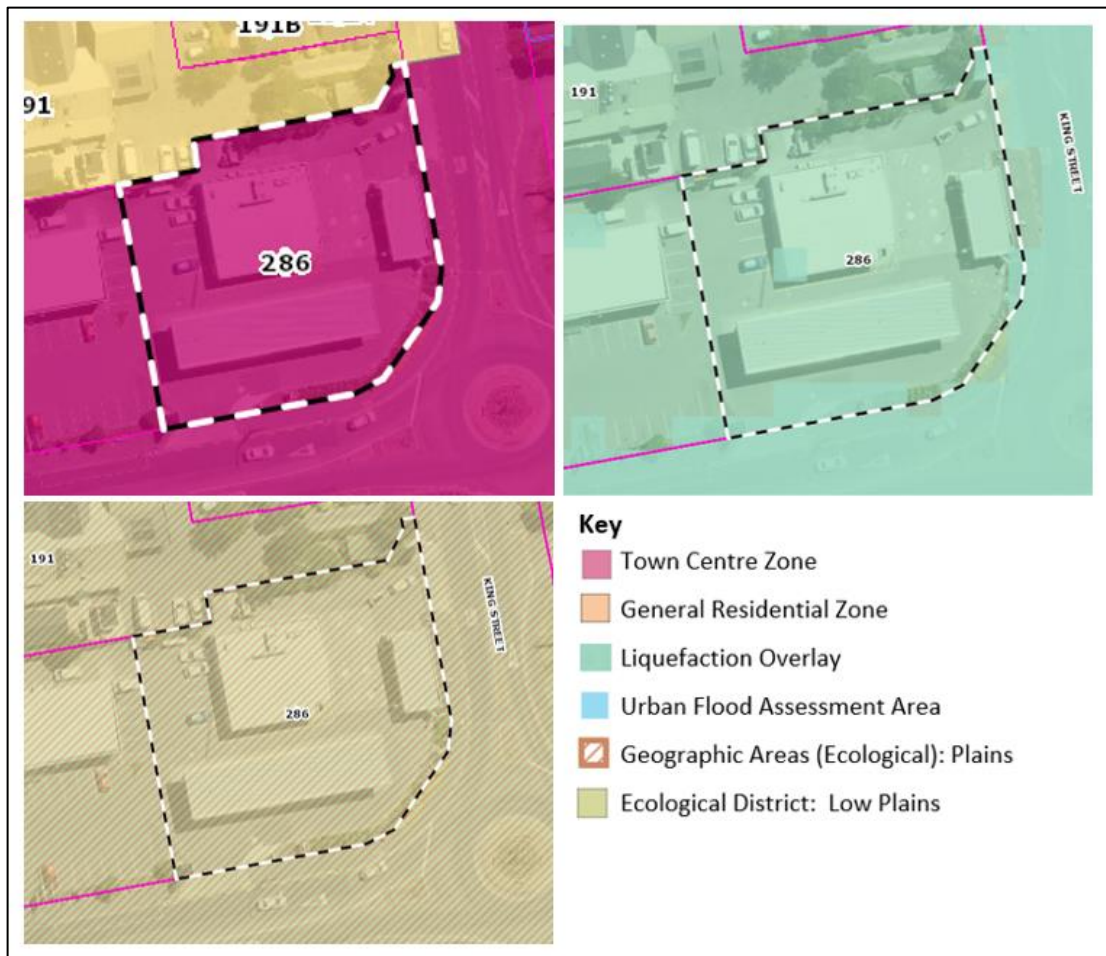


Figure 1: Z Rangiora Proposed District Plan Zoning and Overlays.

Town Centre Zone

Zoning and Overlay

- 1.2 The Town Centre Zone is appropriately applied to the Z Rangiora Service Station site and is supported.
- 1.3 The Z Rangiora Service Station site is excluded from the 'Principal Shopping Street'. This is supported given the location of the site near the periphery of the Town Centre Zone and its use as a service station.

- 1.4 The Town Commercial Zone is appropriately identified as the District's principal focal point providing for a wide range of retail, commercial, community, recreation and service activities within Rangiora, Kaiapoi, Oxford and Woodend. However, a new policy is necessary to recognise that some existing activities (such as existing service stations) have functional or operational design requirements that preclude them from meeting the specific urban design standards of the zone, but which are both established and entirely appropriate within the Town Commercial Zone.

Activity Rule CZ-R1

- 1.5 CZ-R1 appropriately provides for the construction or alteration or addition to any building or other structure, subject to those necessary exemptions from built form standards TCZ-BFS6, TCZ-BFS7, TCZ-BFS9 and TCZ-BFS11 set out herein. This generally enables existing service station activities to be maintained or upgraded from time to time.

Activity Rule TCZ-R19 – Service Stations

- 1.6 TCZ-R19 appropriately provides for service stations as a permitted activity in the Town Centre Zone and is supported. However, part (1) of this provision identifies service stations within 30m of a Residential Zone as a Restricted Discretionary Activity – the majority of the Rangiora Site is within 30m of a Residential Zone.
- 1.7 TCZ-R19(1) does not recognise investment associated with the existing Z Rangiora service station, the benefits it provides to community, and the need for it to be maintained and upgraded from time to time. Likewise, the provision does not acknowledge that the Z Rangiora service station is compatible with the adjoining residential environment, where appropriate mitigation measures are already adopted. Specifically, a combination of existing landscape planting and fencing at the Z Rangiora / Residential Zone interface means an appropriate level of amenity is already achieved. The costs of obtaining resource consent for the additions and alterations to an existing service station within 30m of the Residential Zone interface (where all other relevant standards are met) will likely outweigh the benefit (if any) and to require consent in such circumstances is unnecessary and inefficient.

Town Centre Zone Built Standards

Built Form Standards TCZ-BFS1 – maximum building height

- 1.8 Built form standard TCZ-BFS1(2)(a)(i) requires a maximum building height of 12m (noting that the 18m building height area referred in TCZ-BFS1(2)(a)(ii) does not appear to affect the Site). This provision enables the continuation of service station activities on the Z Rangiora Site while ensuring an appropriate level of character and amenity is maintained in the Town Centre Zone.

Built Form Standards TCZ-BFS3 and TCZ-BFS4 - height in relation to boundary and internal building setback

- 1.9 Built form standards TCZ-BFS3 requires a height in relation to boundary control ranging from 35 to 55° measured at 2.5m above ground level. Z Rangiora adjoins

residentially zoned land and is subject to these provisions. Z Energy supports this standard, accepting that it ensures that the desired amenity outcomes can be appropriately met.

- 1.10 Built form standards TCZ-BFS4 requires a 3m internal boundary building setback, where a site adjoins residentially zoned land. Z Rangiora adjoins residentially zoned land and is subject to these provisions. The intention of these standards, to manage effects at the interface of more sensitive zones, is supported by Z Energy.

Built Form Standard TCZ-BFS5 - internal boundary landscaping

- 1.11 Built form standard TCZ-BFS5 requires a 2m wide landscaping strip, where a site adjoins residentially zoned land. Z Rangiora adjoins residentially zoned land. The intention of these standards, to manage effects at the interface of more sensitive zones, is supported by Z Energy. However, these provisions need to recognise that alternative measures, being a combination of existing landscaping and/or fencing is appropriate on existing service station sites to achieve appropriate amenity outcomes.

Built Form Standard TCZ-BFS6 - landscaping requirements on a road boundary

- 1.12 Built form standard TCZ-BFS6 requires that sites in the Town Centre Zone adjoining a road boundary, and where a site is not built to the road boundary, be landscaped the full length of the road boundary (excluding vehicle crossings, outdoor seating or dining areas) to a minimum depth of 2m. The landscape strip must a minimum of one tree for every 10m of road frontage or part thereof, with the trees being minimum of 1.5m in height at time of planting.
- 1.13 Z Energy opposes the imposition of this standard to existing service stations sites, including Z Rangiora. Z Energy accepts that landscaping along the road boundary can enhance the attractiveness of a site and mitigate the effects of the development of the site. For existing service station sites, however, incorporating trees into front boundary landscaping is problematic. As vehicle oriented activities, visibility is critical to a successful operation and substantial trees can create issues of traffic safety. Therefore, alterations or additions to existing service stations should be excluded from the requirements of this standard.

Built Form Standard TCZ-BFS7 - road setback, glazing, verandas and pedestrian access

- 1.14 Built form standard TCZ-BFS7 requires that all buildings in the Rangiora Town Centre Zone located on a site adjoining a road boundary (excluding those with frontage to a Principal Shopping Street) be built to the road boundary and meet various veranda, glazing, and pedestrian access requirements which a service station would not practicably be able to comply with. For example, pedestrian access to a service station store is most appropriately provided from the forecourt, not a road boundary. Likewise, the forecourt and canopy typically maintain abundant levels of open space on site meaning that service station buildings, which are generally setback from the road boundary to provide for vehicle access and circulation, do not require large areas of glazing. For these reasons, alterations or additions to existing service stations should be excluded from the requirements of this standard.

Built Form Standard TCZ-BFS9 - outdoor storage areas

- 1.15 Z Energy opposes Built Form Standard TCZ-BFS9 which requires that any outdoor storage or car parking areas be screened by 1.8m high solid fencing or dense hedge landscaping from any adjoining site within a number of zones, including the Residential Zone, or the road boundary. This provision is problematic insofar as it relates the normal function and operation of existing service stations.
- 1.16 It is considered that landscaping of carparking at existing service stations should be excluded from this standard, as most often the parking for service stations is provided under the forecourt canopy, to appropriately recognise the functional requirements of parking provision at service stations. It is noted that service stations should remain subject to internal boundary landscaping and / or fencing requirements, ensuring an appropriate level of amenity is maintained.
- 1.17 'Outdoor Storage Area' is not defined in the PWDP meaning it is not clear how TCZ-BFS9 will be applied. Nevertheless, the functional and operational requirements of existing service stations need to be recognised, insofar as various facilities are stored outdoors and need to be readily accessible to customers and staff. Therefore, alterations or additions to existing service stations should be excluded from the requirements of this standard.

A5. RELIEF SOUGHT

1. **Retain** the zoning of the Z Rangiora as Town Centre Zone.
2. **Adopt** a new policy which recognises that some existing activities (such as service stations) have functional or operational design requirements that preclude them from meeting the urban design objectives of the Town Centre Zone, but which are both established and entirely appropriate within the Zone. This could be achieved by adding a policy along the following lines (additions underlined):

Where existing activities do not contribute to the traditional main street design outcomes sought in other policies, to ensure the design of development makes a positive contribution to the streetscape and character of its surroundings, while having regard to the functional and operational requirements of activities.

3. **Retain** Rule TCZ-R1 to classify the construction or alteration of or addition to any building or other structure as a permitted activity, as follows:

TCZ-R1 Construction or alteration of or addition to any building or other structure	
Activity status: PER	Activity status when compliance not achieved with TCZ-R1(1)(a): as set out in the relevant built form standards
Where:	Activity status when compliance not achieved with TCZ-R1(1)(b) and TCZ-R1(1)(c): RDIS
1. the activity complies with:	Matters of discretion are restricted to:
a. all built form standards (as applicable);	CMUZ-MD3 - Urban design
b. any building or addition is less than 450m ² GFA; and	
c. any new building or addition does not have frontage to a Principal Shopping Street.	

4. **Retain** Rule TCZ-R19, providing for service stations as a permitted activity as follows:

<p>TCZ-R19 Service station</p> <p>Activity status: PER</p> <p>Where:</p> <p>1. the <u>service station</u> shall not be located within 30m of any <u>Residential Zones</u>.</p>	<p>Activity status when compliance not achieved: RDIS</p> <p>Matters of discretion are restricted to:</p> <p><u>CMUZ-MD2 - Drive through</u> restaurants and service stations</p>
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5. **Adopt** a new rule which provides for alterations and additions to existing service stations, including within 30m of a Residential Zone, where built form standards TCZ-BFS1 to TCZ-BFS5 (only) are met (subject to all relevant amendments set out in this submission). Built form standards TCZ-BFS6, TCZ-BFS7, TCZ-BFS9 and should be excluded to achieve 1.12 to 1.17 of this submission. This new rule could be drafted as follows (additions underlined):

TCZ – RXX Alterations and Additions to Buildings, Structures and Carparking on Existing Service Station Sites

Activity Status: PER

Where:

1. Built Form Standards TCZ-BFS1, TCZ-BFS2, TCZ-BFS3, TCZ-BFS4, TCZ-BFS5 and BFS11 are met.

Activity status when compliance not achieved: RDIS

Matters of discretion are restricted to:

CMUZ-MD2 - Drive through restaurants and service stations

Notification

An application for a restricted discretionary activity under this rule is precluded from being publicly notified, but may be limited notified.

Alternatively, alterations and additions at existing service stations could be specifically excluded from each of the relevant standards, being TCZ-BFS6, TCZ-BFS7 and TCZ-BFS9.

6. **Retain** the exclusion of the Z Rangiora site from the 'Principal Shopping Street' overlay.
7. **Retain** built form standard TCZ-BFS1 identifying the maximum building height as 12m insofar as it relates to Z Rangiora, as follows:

TCZ-BFS1 Height

1. The minimum height of any building fronting a Principal Shopping Street shall be 5m above ground level.
2. The maximum height of any building, shall be:
 - a. for Rangiora and Kaipoi:
 - i. 12m above ground level, except as specified under (ii) below;
 - ii. 18m above ground level in identified areas shown on the planning map where:
 - a. at least one floor is designed and used for residential activity as part of a mixed-use commercial and residential development; and
 - b. the maximum road wall height of any building shall be 12m;
 - b. for all other areas, 12m above ground level.
3. All heights shall be calculated as per the height calculation.

Activity status when compliance not achieved: DIS

8. **Retain** built form standard TCZ-BFS3 specifying height in relation to boundary requirements, as follows:

TCZ-BFS3 Height in relation to boundary when adjoining Residential Zones, Rural Zones or Open Space and Recreation Zones

1. Where an internal boundary adjoins any Residential Zones, Rural Zones or Open Space and Recreation Zones, the height in relation to boundary for the adjoining zone shall apply, and where specified structures shall not project beyond a building envelope defined by recession planes measured 2.5m from ground level above any site boundary in accordance with the diagrams in Appendix APP3.

Activity status when compliance not achieved: RDIS

Matters of discretion are restricted to:

CMUZ-MD4 - Height in relation to boundary

Notification

An application for a restricted discretionary activity under this rule is precluded from being publicly notified, but may be limited notified.

9. **Retain** built form standard TCZ-BFS4 specifying height in relation to boundary requirements, as follows:

TCZ-BFS4 Internal boundary setback

1. The minimum building setback from internal boundaries of sites that adjoin any Residential Zones, Rural Zones, or Open Space and Recreation Zones shall be 3m.

Activity status when compliance not achieved: RDIS

Matters of discretion are restricted to:

CMUZ-MD5 - Internal boundary setbacks

Notification

An application for a restricted discretionary activity under this rule is precluded from being publicly notified, but may be limited notified.

10. **Amend** built form standard TCZ-BFS5, specifying internal boundary landscaping requirements, to allow for a combination of landscaping and / or fencing to achieve appropriate amenity outcomes. This could be achieved as follows (deletions in strikethrough, additions underlined):

Any internal boundary that adjoins any residential or open space and recreation zones must either:

2. Be fully fenced with a solid fence or wall of a minimum of 1.8m in height; or
3. ~~Landscaping shall be provided along the full length of all internal boundaries with any residential or open space and recreation zones. This landscape strip shall be a minimum of 2m wide.~~ Be fully planted and / or landscaped to a minimum of 2m wide and include a minimum of one tree for every 10m of shared boundary or part thereof, with the trees to be a minimum of 1.5m in height at time of planting; or
4. Be fully screened with a combination of (1) and/ or (2).

Activity status when compliance not achieved: RDIS

*Matters of discretion are restricted to:
CMUZ-MD6 - Internal boundary landscaping*

Notification

An application for a restricted discretionary activity under this rule is precluded from being publicly notified, but may be limited notified.

- 11. Adopt** any other such relief, including additions, deletions or consequential amendments as a result of the matters raised in these submissions, as necessary to give effect to this submission.

SCHEDULE B

Z AS RANGIORA AIRFIELD

B1. PROPOSED ZONING AND ZONE PROVISIONS APPLYING TO Z ASSET SUBJECT OF THIS SCHEDULE

- Zoning maps for Z assets (Z AS Rangiora) at Rangiora Airfield, located at 219 Merton Road, Fernside, and associated zone provisions

B2. THE SPECIFIC PARTS OF THE PWDP THAT ARE SUBJECT OF THIS SUBMISSION

- Zoning of the Site as Rural Lifestyle Zone
- Overlays relating to the site:
 - Rangiora Airfield Designation

B3. SUMMARY OF POSITION

- **NEUTRAL** – the zoning of the Rangiora Airfield as Rural Lifestyle Zone.
- **SUPPORT** – the rollover of the existing designation Rangiora Airfield Designation, without modification.

B4. REASON FOR SUBMISSION

- 1.1 The Z Rangiora Airfield contains Z AS Rangiora (petroleum storage and supply facility) which support the continuation of airfield related activity operating on Site under designation WDC-1. The below excerpt from the PWDP Planning Maps shows the proposed zoning and overlays for the Rangiora Airfield, as follows (site highlighted in black and white outline):

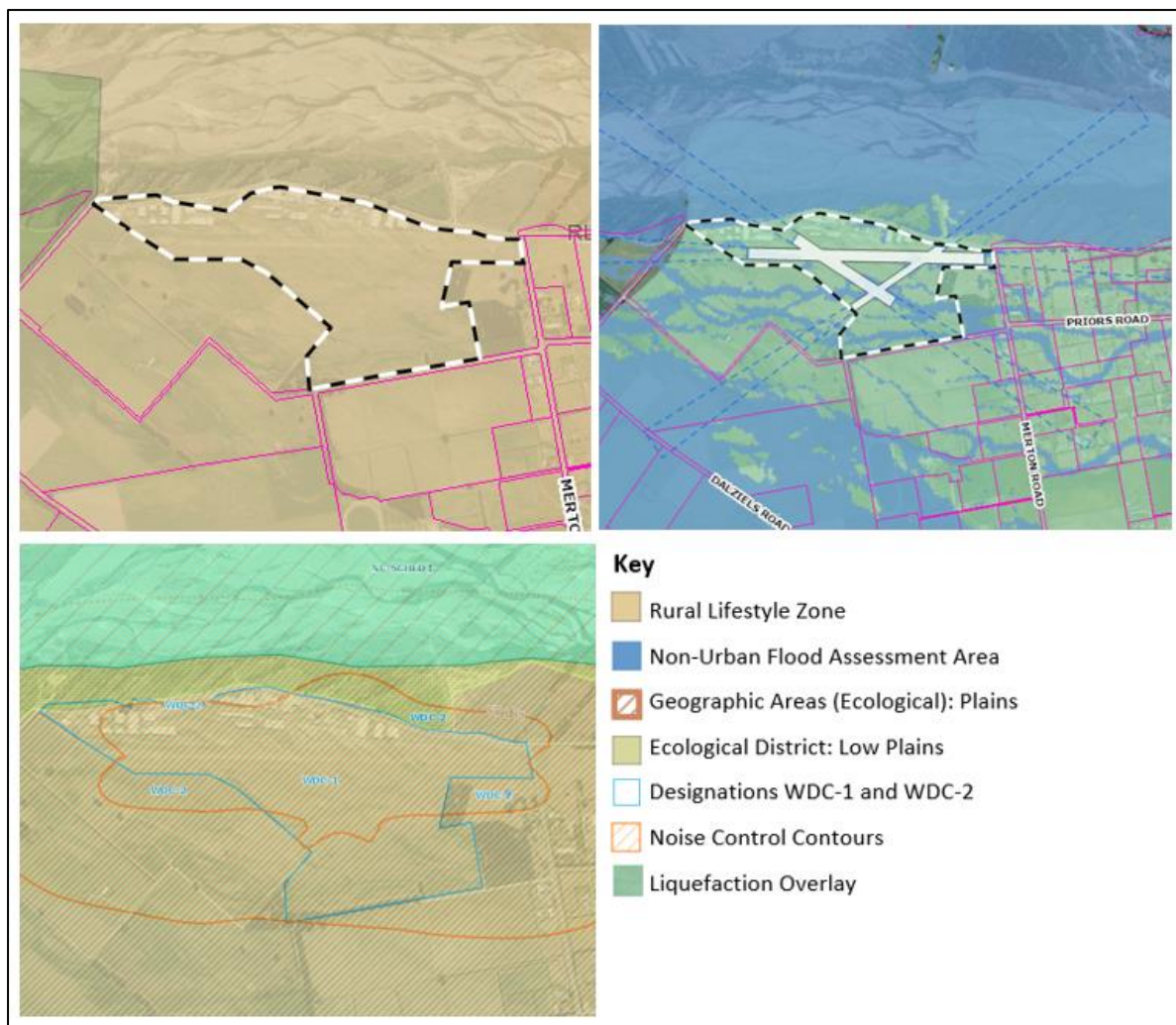


Figure 2: Rangiora Airfield Proposed District Plan Zoning and Overlays.

Rural Lifestyle Zone

- 1.2 The Rural Lifestyle Zone and Designation WDC-01 are appropriately applied to the Rangiora Airfield and are supported as this will provide for the continuation of airfield related activities at the Site and is supported.

B5. RELIEF SOUGHT

1. **Retain** the zoning of the Z Airfield as Rural Lifestyle Zone.
2. **Retain** Designation WDC-1 as shown on the PWDP Planning Maps without modification.
3. Make any additions, deletions or consequential amendments necessary as a result of the matters raised in this submission.
4. Adopt any other such relief as to give effect to this submission.

SCHEDULE C

Z WAIKUKU SERVICE STATION

C1. PROPOSED ZONING AND ZONE PROVISIONS APPLYING TO Z ASSET SUBJECT OF THIS SCHEDULE

- Zoning maps for the Z Waikuku Service Station located at 1413 Main North Road, Waikuku, and associated zone provisions.

C2. THE SPECIFIC PARTS OF THE PWDP THAT ARE SUBJECT OF THIS SUBMISSION

- Zoning of the Site as Large Lot Residential Zone
- Overlays relating to the site:
 - Ngā Tūranga Tūpūna Area - SASM 013
 - Designation NZTA-1

C3. SUMMARY OF POSITION

- **SUPPORT** – the zoning of Z Waikuku Service Station as Large Lot Residential Zone.
- **OPPOSE** – the absence of policy which recognises that existing service station activities may require maintenance and / or upgrades from time to time.
- **OPPOSE** – the listing of service stations as a non-complying activity without exemption for alterations and additions at existing service stations, in Rule LLRZ-R29.
- **NEUTRAL** – Designation NZTA-1 insofar as it extends into the Site.
- **SUPPORT** – Ngā Tūranga Tūpūna Area - SASM 013 Overlay.
- **OPPOSE** – the absence of exclusion for earthworks within the SASM 013 Overlay where the land has been previously modified, in rule SASM-R4

C4. REASON FOR SUBMISSION

- 1.1 Z Waikuku Service Station is located at 1413 Main North Road, Waikuku. The below excerpt from the PWDP Planning Maps shows the proposed zoning and overlays for the site, as follows (site highlighted in black and white outline):

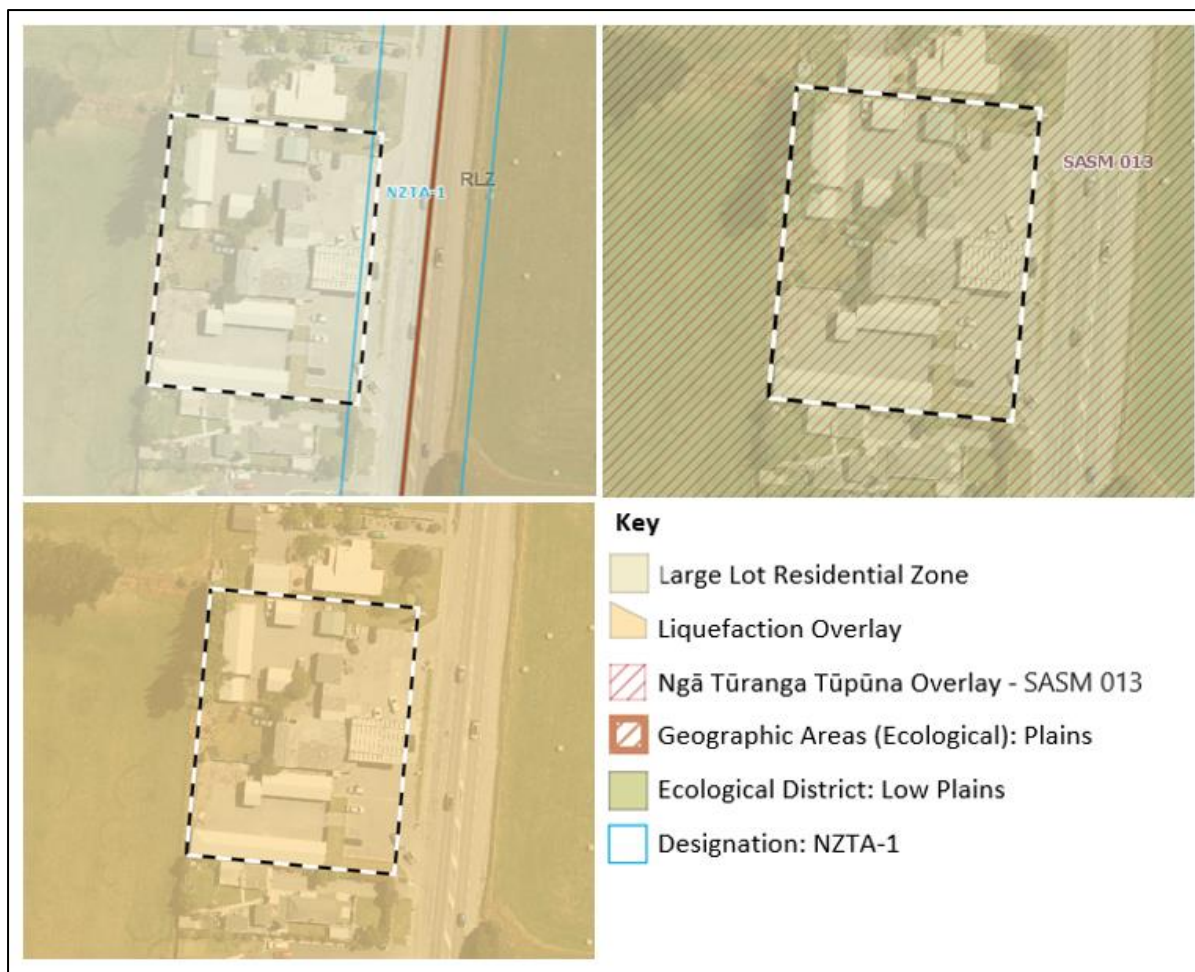


Figure 3 Z Waikuku Proposed District Plan Zoning and Overlays.

Large Lot Residential Zone

- 1.2 The Large Lot Residential Zone is appropriately applied to the Z Waikuku Service Station site and is supported.
- 1.3 There is an absence of provision which recognise the investment associated with the existing Z Waikuku Service Station, the benefits it provides to the community and the need for it to be maintained and upgraded from time to time.

NZTA 1 Designation Overlay:

- 1.3 Z Energy supports the rollover of the Designation NZTA 1, noting the purpose of NZTA 1 is to undertake construction, maintenance, operation, use and improvement of the State highway network and associated infrastructure.

Archaeological Site Extent and Site of Significance to Maori Overlays

- 1.4 SASM013 applies to the Z Waikuku Service Station and surrounds. SASM013 is identified as a *‘Cultural Landscape encompassing an area of high coastal settlement (in both contemporary and ancestral senses). It comprises significant clusters of recorded archaeology of Māori origin and silent files.*

- 1.5 Z Energy is neutral as to the SASM013 overlay, however Z Energy opposes Rule SASM-R4 insofar as it fails to adequately provide for the operation, maintenance and upgrade of existing facilities at established commercial premises which have already been extensively disturbed.
- 1.6 While Z Energy accepts that earthworks can generate adverse effects on the Cultural Landscape and potentially areas of significance to Māori currently unknown to Z Energy, the risk of this is very low where the earth has previously been disturbed / modified (e.g.: where existing buildings and underground tanks or lines have been installed). The costs of obtaining resource consent for earthworks associated with the operation, maintenance and upgrade in such circumstances outweighs the benefit (if any) and to require consent in such circumstances is unnecessary and inefficient. SASM-R4 should be amended to permit such activities.

C5. RELIEF SOUGHT

1. **Adopt** objective, policy and rule provisions that ensure that the Large Lot Residential Zone makes appropriate provision for additions and / or alterations and /or modifications to the existing Z Waikuku Service Station. The new policy provisions should provide for additions and or alterations to this existing service station, the new rule should make the resource consent requirement for alterations, additions or modifications to the existing service station no more stringent than discretionary. One way of achieving this intent would be to include the following new objective, policy and rule into the Large Lot Residential Zone (additions underlined):

LLRZ-OX - Existing Service Station Activities:

The investment associated with existing commercial activities, including service stations, the benefits they can provide to the community and the need for them to be maintained and upgraded from time to time is recognised.

LLRZ-PX Existing Service Station Activities:

To enable additions, alterations, or modifications to existing service stations, recognising the investment associated with the existing use, and the social and community function they serve in providing for the day to day needs of the community.

LLRZ-RX – Existing Service Station

Activity Status: Discretionary

Where:

1. The activity comprises additions, alterations or modifications to the existing service station at 1413 Main North Road, Waikuku.

Activity Status when compliance not achieved: Refer Rule LLRZ-R29.

2. **Amend** SASM-R4 to permit earthworks which provide for the maintenance or upgrade or operation of existing infrastructure and services. This could be achieved by making changes along the following lines (additions underlined):

Activity status: PER

Where:

1. the earthworks and land disturbance is limited to:

- a) planting of trees;*
- b) gardening;*
- c) building foundations, septic tank and swimming pool installations where the combined volume of earthworks is 350m³ or less;*
- d) freestanding sign foundations to a maximum depth of 200mm or to the depth already disturbed (whichever is the greater);*
- e) drain and track maintenance;*
- f) cultivation, stopbanks, roadworks and other activities within land previously disturbed by previous earthworks to the depth already disturbed;*
- g) cultivation to a maximum depth of 200mm;*
- h) a customer connection between a building, other structure, site, and infrastructure as per EI-R4; ~~and~~*
- i) the drilling of a well or bore; and*
- j) the maintenance or upgrade or operation of existing infrastructure, critical infrastructure and services.*

3. **Make** any additions, deletions or consequential amendments necessary as a result of the matters raised in this submission.
4. **Adopt** any other such relief as to give effect to this submission.

SCHEDULE D

Z Asset Affected: All Service Stations

D1. PROPOSED TRANSPORT PROVISIONS (DISTRICT WIDE)

Various provisions included in Part 2: District Wide Matters: Energy, Infrastructure and Transport, namely:

- Installation of new charging facilities for electric vehicles
- Carpark landscaping
- High traffic generators

D2. THE SPECIFIC PARTS OF THE PWDP THAT ARE SUBJECT OF THIS SUBMISSION

- Rule TRAN-R13
- Rule TRAN-R17
- TRAN-R20 and table TRAN-1

D3. SUMMARY OF POSITION

- **SUPPORT** – the provision for the installation of new charging facilities for electric vehicles as a permitted activity, in Rule TRAN-R17.
- **OPPOSE** – the application of carpark landscaping rules without exemption for additions and alterations at existing service stations, in Rule TRAN-R13.
- **OPPOSE** – the inclusion of provisions TRAN-1 and TRAN-R20 for high traffic generators, without an exclusion for service stations.

D4. REASON FOR SUBMISSION

New charging facilities for electric vehicles

- 1.1 Rule TRAN-R17 provides for the installation of new charging facilities for electric vehicles as a permitted activity which is considered appropriate and is supported.

High Traffic Generators

- 1.2 TRAN-P5 aims to manage the adverse effects of high traffic generating activities on the transport system. Policy TRAN-P5(1) specifically considers the extent that high traffic generating activities *‘generate additional vehicle movements beyond what the existing road design can safely or efficiently accommodate or what the classification of the road within the District Plan road hierarchy intends to accommodate.’*
- 1.3 High trip generator activities are not defined in the PWDP but are instead identified by average daily traffic generation thresholds set out in TRAN-1. Corresponding Rule TRAN-R20 stipulates that where the relevant traffic volume threshold for any specified zone is exceeded, consent is required for a Restricted Discretionary Activity. Where

Rule TRAN-R20 is triggered an ITA prepared by a independent suitably qualified and experienced transport engineer will be required.

- 1.4 With the purpose of Policy TRAN-P5(1) in mind, the absence of provision which recognises the unique traffic generation characteristics of service stations in Rule TRAN-1 TRAN-R20 should be revisited. Service stations are vehicle orientated activities but are not high traffic generating activities, in the ordinary sense. Service stations tend to attract mostly pass-by trips, in other words, trips that are already travelling on the network. Typically, and on average for service stations, it can be assumed that approximately 75% of trips are pass-by trips, with the remaining 25% being new trips (5%) or diverted trips (20%). For this reason, service stations do not typically generate additional vehicle movements beyond what the existing road design can safely or efficiently accommodate. Service stations should therefore be excluded from those provisions relating to 'high trip generator activities.

E5. RELIEF SOUGHT

1. **Retain** Rule TRAN-R17 specifying the installation of new charging facilities for electric vehicles as a permitted activity in all zones, as follows:

TRAN-R17 Installation of new charging facilities for electric vehicles		
All Zones	Activity status: PER Where: 1. the new charging facility is installed immediately adjacent to an existing, permitted or consented vehicle <u>parking space</u> located in a <u>road corridor</u> , vehicle depot, garage, <u>parking lot</u> , <u>parking area</u> or <u>parking building</u> .	Activity status when compliance not achieved: RDIS Matters of discretion are restricted to: <u>TRAN-MD19 (10) - Land transport infrastructure</u>

2. **Amend** Rule TRAN-R20 to recognise that service stations are not high traffic generating activities. This could be achieved as follows (deletions in strikethrough, additions underlined):

TRAN-R20 High traffic generators

Activity status: RDIS

Where:

1. *any activity generates an average daily traffic volume that exceeds the thresholds contained in Table TRAN-1 below; and*
2. *for the activities in (1) above:*
 - a) *either a Basic ITA or Full ITA shall be required;*
 - b) *the type of ITA to be provided shall be determined by the circumstances set out in Table TRAN-2 below; and*
 - c) *the ITA shall be prepared by an independent suitably qualified and experienced transport engineer.*

Except that TRAN-R20(1) and (2) shall not apply to service stations.

Matters of discretion are restricted to: TRAN-MD11 – High traffic generators.

3. Make any additions, deletions or consequential amendments necessary as a result of the matters raised in this submission.
4. Adopt any other such relief as to give effect to this submission.

From: [Joy Morse](#)
To: [Jessica Manhire](#)
Subject: FW: Proposed District Plan Submission - Z Energy Limited
Date: Tuesday, 14 December 2021 3:47:44 PM
Attachments: [image001.png](#)
[0.png](#)
[NOTICE OF SUBMISSION TO THE PROPOSED WAIMAKARIRI DISTRICT PLAN.f.pdf](#)



Good afternoon Jessica,

Thank you for your call. I can confirm that Schedule A, Part A2 of the attached document should read as follows:

A2. THE SPECIFIC PARTS OF THE PWDP THAT ARE SUBJECT OF THIS SUBMISSION

- Zoning of the Site as Town Centre Zone
- Policy ~~TCZ-P1~~ and TCZ-P2
- Rule TCZ-R1
- Rules TCZ-R19
- Built Form Standard TCZ-BFS1, TCZ-BFS3 to TCZ-BFS7 and TCZ-BFS9

To clarify, there is no relief sought in the document that is in specific relation to TCZ-P1 or TCZ-BFS2.

Please let me know if you should have any further questions.

Kind regards

Joy Morse

Senior Planning and Policy Consultant

Mobile: 027 746 4611

[4Sight.Consulting](#)

From: Joy Morse
Sent: Friday, 26 November 2021 4:47 PM
To: External link <developmentplanning@wmk.govt.nz>
Cc: Mark Laurenson <markl@4sight.co.nz>; Matt Brennan <Matt.Brennan@z.co.nz>
Subject: Proposed District Plan Submission - Z Energy Limited

Tēnā koe,

Please see attached a submission on behalf of Z Energy Limited in relation to the Proposed Waimakariri District Plan.

Ngā mihi,

Joy Morse

Senior Planning and Policy Consultant

Mobile: 027 746 4611

Company Name



Level 2, 214 Collingwood Street, Hamilton 3204
PO Box 1420 Waikato Mail Centre, Hamilton 3240
[4Sight.Consulting](#)

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