# BEFORE INDEPENDENT HEARING COMMISSIONERS APPOINTED BY THE WAIMAKARIRI DISTRICT COUNCIL

IN THE MATTER OF	The Resource Management Act 1991 (' <b>the</b> <b>Act</b> ')
AND	
IN THE MATTER OF	Hearing of Submissions and Further Submissions on the Proposed Waimakariri District Plan (' <b>the Proposed Plan</b> ')
AND	
IN THE MATTER OF	Submissions and Further Submissions on the Proposed Waimakariri District Plan by <b>McAlpines Limited</b>

## EVIDENCE OF CLARE DALE ON BEHALF OF MCALPINES LIMITED REGARDING STREAM 12 REZONING OF LAND

Dated: 5 March 2024

Presented for filing by: Shona Walter PO Box 18, Christchurch T 021 311 784 shona.walter@saunders.co.nz

## INTRODUCTION

- 1 My full name is Clare Elizabeth Dale. I am a senior planner practising with Novo Group Limited in Christchurch. Novo Group is a resource management planning and traffic engineering consulting company that provides resource management related advice to local authorities and private clients.
- 2 I hold the qualifications of a Bachelor of Resource Studies (Policy and Planning Stream) from Lincoln University, attained in 2002. I am an associate member of the New Zealand Planning Institute.
- 3 I have over 20 years of experience as a resource management planner, predominantly working at Christchurch City Council in a range of planning roles (consenting, policy and heritage), and as a consultant since 2021. This includes experience processing a significant number of commercial and industrial consents.
- 4 I have also prepared evidence for, and appeared in, resource management consent and plan hearings, Environment Court mediations, and Environment Court hearings.
- 5 I have been engaged by the Submitter as an independent planning expert in relation to their submission on the PDP and in particular the Stream 12 Rezoning hearings.
- 6 I have read the Environment Court's Code of Conduct and agree to comply with it. My qualifications as an expert are set out above. The matters addressed in my evidence are within my area of expertise, however where I make statements on issues that are not in my area of expertise, I will state whose evidence I have relied upon. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in my evidence.

#### **SCOPE OF EVIDENCE**

7 I have been engaged by McAlpines Limited (the Submitter) to provide evidence in support of its primary submission (submitter #226) on the Waimakariri District Council's (WDC) Proposed District Plan (PDP) in relation to Stream 12 Rezoning requests. My evidence covers submissions on the PDP in relation to rezoning approximately 1ha of land at 1 Southbrook Road, Rangiora shown in **Figure 1** below as 'Block B' from GIZ to LFRZ (**the Proposal**).

- 8 My evidence is structured as follows:
  - (a) Context and site;
  - (b) Statutory Framework;
  - (c) Assessment of Effects;
  - (d) Statutory Analysis; and
  - (e) Matters raised by submitters/further submitters.



Figure 1: Block B extent of LFRZ rezoning request shown in red (source: evidence of Gary Wake)

## **DOCUMENTS CONSIDERED**

- 9 In preparing my evidence I have reviewed the submission filed on behalf of McAlpines Limited dated 26 November 2021 (the McAlpines Submission) and the evidence of Mr Gary Wake, Safety, Risk and Property Manager at McAlpines Limited prepared for this hearing stream (Mr Wake's evidence).
- 10 I have also considered:
  - (a) The National Policy Statement Urban Development (**NPS-UD**);
  - (b) The Greater Christchurch Spatial Plan (**GCSP**)
  - (c) The Canterbury Regional Policy Statement (**CRPS**);
  - (d) The Proposed Plan; and

Evidence of Clare Dale for McAlpines dated 5 March 2024 (Planning)

(e) The WDC Hearing Stream 12 Memo to rezoning submitters (via hearing panel) dated 12 December 2023.

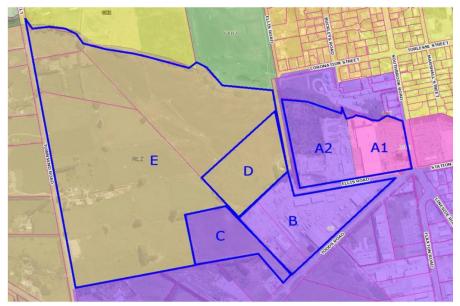
## SUMMARY

- The submitter seeks to rezone approximately 1ha of land at 1 SouthbrookRoad, Rangiora shown in Figure 1 as Block B from GIZ to LFRZ.
- Since the submission was lodged back in November 2021 the scope and extent of the rezoning request have been further refined by the Submitter. What was a substantial rezoning request across several parts of the Submitter's land holding in Southbrook Rangiora, is now scaled back to moving the boundary of the Large Format Retail Zone (LFRZ) 50 metres or approximately 1 hectare to the west. This is to ensure that the whole of the existing Mitre 10 Mega operation is contained within a single zone (submission point # 226.5) and not split between the LFRZ and General Industrial Zone (GIZ).
- 13 My evidence concludes, that it is appropriate that the PDP rezone the land block referred to as 'Block B' in the evidence of Mr Gary Wake and shown in Figure 1 as LFRZ. The activities carried out on this block are integral to the operations of the existing Mitre 10 Mega Store and having a consistent zoning for the activity makes for simpler administration of any future consenting exercise. Given the small scale of the requested zone boundary movement, that 'Trade Supplier' activities are permitted in both the LFRZ and GIZ and that the proposal is not in relation to a greenfield site, I consider that an outline development plan is not necessary for the rezoning.
- I consider the benefits of the rezoning proposal outweigh any costs. Further, I consider that the proposal gives effect to the relevant sections of the Canterbury Regional Policy Statement (**CRPS**), is supported by the relevant PDP objectives and policies, and is the most appropriate way of achieving the purpose of the Act.

#### **CONTEXT AND SITE**

#### **The McAlpines Submission**

- 15 The McAlpines submission made in 2021 was on the PDP in its entirety but specifically in relation to Stream 12 Rezonings sought to:
  - (a) Support the rezoning of the Submitter's 'Block A1' to LFRZ (refer to Figure 2 below);
  - (b) Rezone the Submitter's land referred to as 'Block A2' from GIZ to LFRZ (refer to Figure 2 below); and
  - (c) Rezone the Submitter's land referred to as 'Block D' from Rural Lifestyle Zone (RLZ) to GIZ (refer to Figure 2 below).



**Figure 2:** *Full extent of the submission rezoning request (source: Adderly Head submission)* 

## **The Proposal**

Since the submission was lodged back in November 2021 the scope and extent of the rezoning request have been further refined by the Submitter. What was a substantial rezoning request across several blocks of the Submitter's land holding in Southbrook Rangiora, is now scaled back to moving the boundary of the LFRZ 50 metres or approximately 1 hectare to the west (as illustrated in **Figure 1**), referred to as Block B. The purpose of the request is to ensure that the whole of the existing Mitre 10 Mega Store operation is contained within a single zone and not split between the LFRZ and GIZ. 17 The Submitter requests that the Hearings Panel amend the PDP maps so that Block B is zoned LFRZ. An amended planning map is attached as **Appendix 1** to this evidence. No other changes to the PDP are considered necessary to give effect to the requested relief.

#### **Site Description**

- Block B is located at 1 Southbrook Road, Rangiora and is legally described as
  PT Rural SEC 370. The Submitter owns the land marked A1 and A2 on Figure
  2 above which contains approximately 8.1 ha. The land is zoned Business 2
  under the Operative District Plan (ODP) and is held across three land titles.
- 19 Block B is bordered by South Brook Stream to the north, Southbrook Road to the east, Ellis Road to the South and the Submitter owns Rural land to the west. The wider area at Southbrook is characterised by a mix of industrial and commercial land uses for example Pak'nSave, Plumbing World, Kennards Hire, grain and stockfeed storage, McDonalds and self-storage units.
- 20 The Submitter's sawmilling activities have occupied the site at Southbrook since 1960. On 8 December 2006, the WDC issued a resource consent to remove the old Mitre 10 store and replace it with the new Mitre 10 Mega Store and garden centre (RC065628). The 2006 resource consent decision is attached at Appendix D to Mr Wake's evidence.
- 21 On 4 March 2019, the Waimakariri District Council issued a resource consent (RC185275) for extension of the Mitre 10 Mega Store. The 2019 resource consent is attached at Appendix E to Mr Wake's evidence. This consent included the Trade Yard exit driveway and Inwards Goods entrance/exit driveway immediately to the west of the Mitre 10 Mega Store building.
- 22 Over time and particularly in relation to the Covid 19 pandemic and growth in the Waimakariri District, 'Block B' has also become incorporated into the Mitre 10 Mega Store activities, being outdoor and indoor (in existing sheds) storage of additional stock (not public retail space). Mr Wake's evidence (at paragraph 20) describes in detail the use of 'Block B' and why it is critical to the Mitre 10 Mega Store operations. His evidence in Appendix G also includes photographs of the use of 'Block B'. It is acknowledged that the land within 'Block B' is not contained within the resource consents issued by WDC for the Mitre 10 Mega Store.

23 Under the PDP the Submitter's land is split-zoned. The eastern part is zoned LFRZ and contains the Mitre 10 Mega Store and associated car parking area (Block A1). The western part of the land is zoned GIZ and contains buildings related to the Submitter's Engineering operations, undeveloped bare land, and the area with various activities that support the Mitre 10 Mega Store operations (Block A2) as described in Mr Wake's evidence. It is noted that the proposed zone boundary between LFRZ and GIZ reflects the resource consents granted for the Mitre 10 Mega Store, rather than the current physical use of the land.

## STATUTORY FRAMEWORK

- 24 The Resource Management Act 1991 (RMA) is the legislative framework that defines the requirements for submissions to District Plan reviews. Section 32 sets out the procedure to evaluate the appropriateness of the requested zone change including proposed provisions, including objectives, policies, rules and other methods. An evaluation of the proposal under section 32AA is attached as **Appendix 2**.
- 25 The evidence for this rezoning request from GIZ to LRFZ has been prepared in accordance with the relevant requirements of the RMA, including:
  - (a) The reason of the request (noted above).
  - (b) An Assessment of Environmental Effects (AEE).
  - (c) The requirement to have regard to the NPS-UD.
  - (d) The requirement to have regard to the CRPS.
  - (e) Having regard to any management plans or strategies prepared under other Acts.
  - (f) The requirement to take into account any relevant planning document recognised by Te Runanga or Ngai Tahu lodged with the Council.
  - (g) The requirement to have regard to the PDP.

## ASSESSMENT OF ENVIRONMENTAL EFFECTS

26 The effects of the Proposal are considered as follows.

- 27 As referred to in Mr Wake's evidence, 'Block B' contains various activities that support day-to-day operations of the Mitre 10 Mega Store. Having the full extent of the Mitre 10 Mega Store operations contained within one zone rather than two is more efficient in terms of plan administration and could reduce future consent costs, as any future redevelopment or alteration to the Mitre 10 Mega Store could be assessed under one zone, as opposed to two.
- 28 The Mitre 10 Mega Store activity and the outdoor storage area associated with it, are considered a "Trade Supplier<sup>1</sup>" activity under the PDP. I note there are no submissions seeking to make changes to trade suppliers being permitted in the LFRZ or GIZ or to change the definition of 'trade supplier'. 'Trade Suppliers' are provided for as a permitted activity in both the LFRZ (LFZZ-R3) and the GIZ (GIZ-R3). Whether Block B is zoned GIZ or LFRZ makes little difference in terms of the effects generated, as the Mitre 10 Mega Store activity is permitted or anticipated in both. The strip of land in question is not suitable for another large format retail activity to establish as it is not large enough, further it would not be suitable for other activities permitted in the LFRZ (e.g. food and beverage) as it located behind the Mitre 10 Mega Store access and yard with low amenity and is not visible from other parts of the retail area.
- 29 The Proposal would adopt, without amendment, the PDP provisions for LFRZ. The PDP built form standards for the LFRZ and GIZ zones are very similar and would result in the same visual and amenity related effects. A summary of built form standards to show these similarities is included in **Appendix 3**. The change in zoning is not anticipated to result in visual or amenity effects.
- 30 I also note that as this is only a repositioning of the zone boundary, no new direct interfaces between zones that don't already adjoin each other under the

- automotive and marine supplies;
- building supplies;
- farming and agricultural supplies;
- garden and landscaping supplies;
- office furniture, equipment and systems supplies;
- hire services (except hire or loan of books, videos, DVDs and other similar home entertainment items);
- industrial clothing and safety equipment supplies; and
- catering equipment supplies.

<sup>&</sup>lt;sup>1</sup> **Trade Supplier:** means a business engaged in sales to businesses, and may also include sales to the general public, and consists only of one or more of the following categories:

plan are proposed. Direct interfaces between GIZ and LFRZ are proposed in the PDP and therefore the LFRZ rule package contains suitable provisions to address that interface and ensure the on-going maintenance of amenity. Reverse sensitivity between the zones was also not considered to be a concern in the S32 analysis prepared by the Council.

- 31 In addition, General District Wide provisions are relevant to the extent that they control effects such as earthworks, light, glare, noise and signs. These provisions would appropriately apply to 'Block B' as a result of its rezoning to LRFZ. Either way the Transport Chapter provisions apply and any expansion of the Mitre 10 Mega Store will be assessed as a High Trip Generator. As such any increased traffic volumes can be assessed as part of any future consent process.
- 32 The rezoning of 'Block B' is directly connected to an existing LFRZ and would thus enable consolidation of the zone within this area of Rangiora. In this situation, given the extent of land being sought to be rezoned is only a portion of the block, and is going from industrial use to commercial use (not a greenfield development) an Outline Development Plan is not considered necessary.
- 33 The Proposal would not result in any noticeable reduction in industrial land supply / capacity as the Trade Supplier activity occupying the land is permitted within the GIZ and the LFRZ. Further the GCSP notes in the medium term (1 – 10 years) there is a surplus of 1ha of Industrial Land and in the long term (out to 30 years) there is a surplus of 23ha. The Proposal also assists towards ensuring sufficient short to medium term feasible development capacity of the Submitter's activity in the LFRZ in Rangiora.
- 34 Lastly, there are no environmental or infrastructural constraints that would preclude rezoning 'Block B' as it is already zoned for urban/industrial use.

## **STATUTORY ANALYSIS**

35 This evidence now turns to policy considerations where the following evaluation assesses the Proposal against the relevant objectives and policies of the NPS-UD, CRPS and PDP.

#### The National Policy Statement on Urban Development

- I have turned my mind as to whether the NPS-UD is a relevant consideration in relation to the Proposal. In a general sense the Proposal is consistent with the parts of Objective 1 and Policy 1 that "seek well-functioning urban environments that enable all people and communities to provide for their social and economic well-being, and for their health and safety, now and into the future<sup>2</sup>" and "have or enable a variety of sites that a suitable for different business sectors in terms of location and size<sup>3</sup>". 'Block B' is located within an urban environment and its rezoning will enable the submitter to continue to provide for their economic wellbeing and to continue to serve the community. The Proposal enables the submitters activity to be located within a single zone rather than being split between two, making planning for the future relatively simple.
- 37 However, beyond generally looking at Objective 1 and Policy 1, given the scale of the Proposal, that it is a change within the existing urban boundary (not a greenfield) and relates to a difference between which business zoning is most appropriate, I consider that no detailed analysis of other NPS-UD provisions is required.

#### **Canterbury Regional Policy Statement**

38 The most relevant CRPS provision to the Proposal is Policy 6.3.6 (Business land) which seeks:

"To ensure that provision, recovery and rebuilding of business land in Greater Christchurch maximises business retention, attracts investment, and provides for healthy working environments, business activities are to be provided for in a manner which:

1. Promotes the utilisation and redevelopment of existing business land, and provides sufficient additional greenfield priority area land for business land through to 2028 as provided for in Map A;

2. Recognises demand arising from the relocation of business activities as a result of earthquake damaged land and buildings;

*3. Reinforces the role of the Central City, as the city's primary commercial centre, and that of the Key Activity Centres;* 

*4. Recognises that new commercial activities are primarily to be directed to the Central City, Key Activity Centres and neighbourhood centres where these activities reflect and support the function and role of those centres; or in* 

<sup>&</sup>lt;sup>2</sup> Objective 1: NPS-UD

<sup>&</sup>lt;sup>3</sup> Policy 1(b) NPS-UD.

circumstances where locating out of centre, will not give rise to significant adverse distributional or urban form effects; 5. Recognises that new greenfield priority areas for business in Christchurch City are primarily for industrial activities, and that commercial use in these areas is restricted; 6. Recognises that existing business zones provide for a range of business activities depending on: i. the desired amenity of the business areas and their surrounds; and ii. the potential for significant distributional or urban form effects on other centres from new commercial activity. 7. Utilises existing infrastructure availability, capacity and quality; 8. Ensures reverse sensitivity effects and conflicts between incompatible activities are identified and avoided or mitigated against; 9. Ensures close proximity to labour supply, major transport hubs and passenger transport networks; 10. Encourages self-sufficiency of employment and business activities within communities across Greater Christchurch; 11. Promotes, where appropriate, development of mixed-use opportunities, within Key Activity Centres provided reverse sensitivity issues can be appropriately managed; and 12. Incorporates good urban design principles appropriate to the context of the development.

- 39 The Proposal is consistent with the above, in that it allows for the redevelopment of existing business land, uses existing infrastructure, does not have a distributional effect on other commercial centres, is located close to the Rangiora labour market, is not incompatible with existing adjoining land uses, and will meet the amenity expectations of the LFRZ.
- 40 I have not considered policy 6.3.3 *Development in accordance with outline development plans* as being overly relevant, given the small scale of the proposed zone boundary adjustment between existing business zones in the PDP, that the land was already zoned for Business in the ODP as well, that the proposal does not relate to greenfield land and is already serviced by infrastructure.

## **Proposed District Plan**

- 41 The Proposal is consistent with the relevant PDP objectives and policies including UDF-P7, LFRZ-O1 and LFRZ-P1.
- 42 While UDF-P7 appears to apply to larger extensions of commercial and mixed use zone, I consider that the Proposal meets it in so far that it provides for the expansion of an existing activity that assists with Rangiora's self-sufficiency (residents don't need to travel to Christchurch for a large trade supply store),

will not undermine the Town and Local Centre Zones in Rangiora and does not impact on the capacity of industrial zoned land in a meaningful way. Finally, for the reasons noted above I do not consider an outline development plan is required.

- 43 The Proposal achieves an integrated LFRZ as it is an extension of an existing zone, does not compromise the function of the Town Centre Zone (**TCZ**) and manages amenity effects at the zone interface and effects on the Transport Network in accordance with the PDP framework. As such I consider that the Proposal is consistent with 'LFRZ-01 Large Format Retail Zone Integration'.
- LFRZ-P1 covers the function of the LFRZ and seeks to provide for large format activities that are difficult to provide for in other commercial centres due to their size and functional requirements. The policy also seeks to avoid small scale retailing and offices, community service, supermarkets and department stores in the LFRZ to ensure the function of the TCZ and other smaller centres are not compromised and to manage traffic network effects. The Proposal is consistent with the above, as it will enable the Mitre 10 Mega Store, which has particular requirements for large floor spaces and sites, to further expand under a single zoning. As the LFRZ provisions will be adopted without change under the Proposal, the other activities described that are not compatible with the zone and the centres hierarchy will be avoided. As noted at paragraph 31above, the High Trip Generator rule will address transport network effects. For the above reasons the proposal is consistent with LFRZ-P1.

## MATTERS RAISED BY SUBMITTERS/ FURTHER SUBMITTERS

45 I am not aware of any submissions or further submissions that oppose the above relief sought by the Submitter.

#### CONCLUSION

46 My evidence concludes that it is appropriate that the PDP rezone Block B. The activities carried out on 'Block B' are integral to the operations of the Mitre 10 Mega Store and having a consistent zoning for the activity makes for simpler administration of any future consenting exercise. Given the small scale of the requested zone boundary movement, that 'Trade Supplier' activities are permitted in both the LFRZ and GIZ and that the proposal is not in relation to a greenfield site I consider that an outline development plan is not necessary.

- 47 I consider the benefits of the Proposal outweigh any costs. Further, I consider the Proposal gives effect to the relevant sections of NPS-UD, CRPS, is supported by the relevant PDP objectives and policies, and is the most appropriate way of achieving the purpose of the Act.
- 48 On the basis of the views expressed above, I consider McAlpines Limited's submission to rezone 'Block B' to LFRZ should be accepted. Thank you for the opportunity to present my evidence.

Clare Dale 5 March 2024

## Appendix 1: Amended Zone Map



## **Appendix 2: Section 32AA Evaluation**

The following assessment under section 32AA is undertaken as part of the requested re-zoning of approximately 1ha of land at the site at 1 Southbrook Road from GIZ to LFRZ. The submission does not seek to propose any new objectives or policies into the District Plan and adopts the zone and general provisions/ rules unaltered.

Section 32AA(1)(b) states that a further evaluation required under this Act must be undertaken in accordance with Section 32(1) to (4). A Section 32 report requires the submitter (and the Council) to evaluate, at a level of detail corresponding to the scale and significance of the anticipated environmental, economic, social and cultural effects, including:

- The extent to which the objectives of the proposal are the most appropriate to achieve the purpose of the Act
- Whether the provisions (rules) are the most appropriate way for achieving the objectives (purpose), by including consideration of any other reasonably practicable options, the efficiency and effectiveness of the provisions in achieving the purpose, and reasons for deciding on the provisions.

Two options are assessed below. The retention of the proposed GIZ, or the provision of the requested LFRZ.

MATTER	BENEFIT	COST
ENVIRONMENTAL	None identified because both zones provide for the	None identified because both zones provide for the submitter's
	submitter's activity in a very similar manner.	activity in a very similar manner.
ECONOMIC	Maintains status quo of ODP industrial land	Potential for increased consenting costs with 2 zones applying to
	capacity.	the submitter's activity.
SOCIAL	No social benefits are identified.	No social costs are identified.
CULTURAL	No cultural benefits identified.	No cultural costs identified.

## **Option 1: Retain the GIZ (status quo)**

Option 1, which seeks to retain the status quo (i.e. retain the GIZ), has slightly greater costs than benefits. Overall, the costs outweigh the benefits and Option 1 is the least preferred option.

## **Option 2: Re-zone to LFRZ**

MATTER	BENEFIT	COST
ENVIRONMENTAL	None identified because both zones provide for the	None identified because both zones provide for the submitter's
	submitter's activity in a very similar manner.	activity in a very similar manner.
ECONOMIC	Could reduce future consenting costs if the activity	Loss of 1ha of industrial land capacity. Not considered significant
	is redeveloped/ expanded if the Mitre 10 Mega	though given both zones permit 'trade supplier' activities.

	activity is all within the 1 zone. Ease of plan	
	administration.	
SOCIAL	No social costs identified.	No social costs identified.
CULTURAL	No cultural benefits identified.	No cultural costs identified.

The proposal best meets the relevant objectives and policies of the Proposed District Plan. The benefits of the re-zoning slightly outweigh the costs. Therefore, option 2 is considered to be most appropriate.

## EFFICIENCY

Option 2, rezoning the site to LRFZ has been assessed as the most efficient use of the land as the Mitre 10 Mega having one zone rather than two reduces plan administration/ consent requirements and is the most appropriate option when the costs and benefits of both are compared. The benefits of Option 2 are considered to slightly outweigh the costs, meaning that is the most efficient option and most appropriate use of the land.

## **EFFECTIVENESS**

Option 2 has been assessed as the preferred option to give effect to the outcomes sought by the PDP. The proposal will provide for a well-functioning urban environment as it provides for a consolidated form and will have sufficient future infrastructure servicing and accessibility. As set out within the assessment of the proposed Waimakariri District Plan objectives and policies assessment in the evidence, the re-zoning to LFRZ is consistent with all relevant objectives and policies as relating to strategic directions and Commercial and Industrial zones. The site is bounded by existing commercial and industrial development and zones (and not on the edge of the urban are) which forms a clear barrier between the development site and the rural environment. The site can be serviced and is easily accessible, therefore assisting in supporting the creation of a well-functioning environment and contributing to people's wellbeing and sustainability.

## **RISK OF ACTING OR NOT ACTING**

Section 32(2)(c) of the RMA requires that the assessment the risks of acting or not acting if there is insufficient information about the subject matter of the provisions. This requirement also applies to the assessment of any changes under Section 32AA.

While the submission on the PDP has not been supported by detailed technical reports (eg: traffic, landscape, infrastructure) and evidence to confirm the suitability of the site for the proposed rezoning, this level of detail is not considered necessary in this instance given the small scale of the rezoning, that the land is already zoned for commercial/industrial zone and that the zone change is a only requested to recognise existing activities already present in the environment. This poses a small risk of acting. However, any risks will be addressed and appropriately detailed at the time of land use consent as it is proposed that the LFRZ and General rules apply to the site.

It is considered that there is no risk of not acting.

Built Form Standard	LFRZ	GIZ
Height	12m	15m
Height in relation to boundary	Recession planes apply to Residential, Open Space/ Recreation and Rural Zones.	Recession planes apply to Residential, Open Space/ Recreation and Rural Zones.
Internal boundary setback	10m from Residential, Open Space/ Recreation and Rural Zones.	10m from Residential, Open Space/ Recreation and Rural Zones.
Internal boundary landscape	2m strip adjoining Residential, Open Space/ Recreation and Rural Zones, including 1 evergreen tree for every 10m of frontage.	2m strip adjoining Residential, Open Space/ Recreation and Rural Zones, including 1 evergreen tree for every 10m of frontage.
Road boundary landscape	2m deep strip adjoining the road except vehicle crossing including 1 evergreen tree for every 10m of frontage.	2m deep strip adjoining the road except vehicle crossing.
Road boundary setback	3m (as site does not adjoin res/ rural/ open space or an arterial road on this frontage).	3m (as site does not adjoin res/ rural/ open space or an arterial road on this frontage).
Location of ancillary office and retail	N/A	Offices and retail to be located forward of other buildings/activities facing the street.
Outdoor Storage	N/A	Screening not required for Trade Suppliers.
Waste Management requirements for commercial activities	5m2 storage area for bins that is screened from the road or behind buildings.	N/A

# **Appendix 3:** Comparison of LFRZ and GIZ Built Form Standards