

**SUBMISSION ON THE TIMARU DISTRICT COUNCIL'S PROPOSED DISTRICT PLAN PURSUANT
TO CLAUSE 6 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991**

To: Timaru District Council
PO Box 522
Timaru 7940

Via email: pdp@timdc.govt.nz

Submitter: Z Energy Limited (*Z Energy*)
PO Box 2091
Wellington 6140

Address for Service: 4Sight Consulting Limited
201 Victoria Street West
Auckland Central
Auckland 1010

Attention: Sarah Westoby
Phone: 021 022 23527
Email: sarahw@4sight.co.nz

A. INTRODUCTION

1. Timaru District Council (*TDC* or *Council*) notified its Proposed District Plan (*PDP*) on 22nd September 2022. The Council invited the public to provide input on the Draft District Plan (*the draft plan*) in 2020 prior to notification. Z Energy provided comments on the draft plan to the Council in December 2020.
2. Z Energy has business interests within the district.
3. Z Energy's primary business includes a fuel retail network, pipelines, terminals and bulk storage terminal infrastructure situated around the country.
4. Z Energy supplies fuel to retail customers and large commercial customers like airlines, trucking companies, mines, shipping companies and vehicle fleet operators.
5. Z Energy owns and manages:
 - a 15.4 per cent stake in Refining NZ which runs New Zealand's only oil refinery. Refining NZ was renamed Channel Infrastructure from April 2022, and now operates as an import terminal from Marsden Point under long-term contracts with its three customers, BP Oil New Zealand, Mobil Oil New Zealand Limited, and Z Energy;
 - 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.
6. In June 2016, Z also purchased the assets of Chevron New Zealand, which sees Z 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. Since May 2022, Z Energy Limited is a subsidiary of Australian company, Ampol Limited.
7. Part of Z Energy's retail fuel network includes Z branded service station sites in the Timaru District (*the district*), and Z branded Truck Stops (TS).
8. Z Energy's wider networks, and including its individual service stations, 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 PDP in order to ensure fuel supply for the district and beyond. This submission is focused on those issues that Z Energy perceives may inappropriately restrict or limit its existing operations. Broader environmental management concerns are addressed in a separate submission.
9. In this case, Z Energy's Z branded service station and TS assets are located in the following zones:
 - Z Caroline Bay Service Station (Large Format Retail Zone)
 - Z Temuka Service Station (Town Centre Zone)
 - Z Geraldine Service Station (Town Centre Zone)
 - Z Washdyke TS (General Industrial Zone).

There is also a Caltex Service Station in the Large Format Retail Zone on Stafford Street which of interest.

This is reflected in the majority of the scope of the submission, which extends to provisions proposed through the PDP that are relevant to these sites.

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

The specific provisions submitted on, the rationale for Z Energy's submission on each of these matters, and the relief sought is contained in **Schedule A** below. Specific changes sought to the provisions are highlighted **yellow** with deletions in ~~striketrough~~ and additions in underline. Z Energy will also support alternative relief that achieves the same outcome(s).

In addition to the specific outcomes and relief sought, the following general relief is sought:

- a) Achieve the following:
 - i. The purpose and principles of the Resource Management Act 1991 (*RMA*) and consistency with the relevant provisions in Sections 6 - 8 *RMA*;
 - ii. Give effect to the Canterbury Regional Policy Statement;
 - iii. Assist the Council to carry out its functions under Section 31 *RMA*;
 - iv. Meet the requirements of the statutory tests in section 32 *RMA*; and
 - v. Avoid, remedy or mitigate any relevant and identified environmental effects.
- b) Make any alternative or consequential relief as required to give effect to this submission, including, to the degree there is scope, any consequential relief required in any other sections of the PDP that are not specifically subject of this submission but where consequential changes are required to ensure a consistent approach is taken throughout the documents; and
- c) Any other relief required to give effect to the issues raised in this submission.

C. Z ENERGY REQUESTS TO BE HEARD IN SUPPORT OF THIS SUBMISSION.

D. IF OTHERS MAKE SIMILAR SUBMISSIONS Z ENERGY MAY BE PREPARED TO CONSIDER PRESENTING A JOINT CASE WITH THEM AT ANY HEARING.

E. Z ENERGY COULD NOT GAIN AN ADVANTAGE IN TRADE COMPETITION THROUGH THIS SUBMISSION.

F. Z ENERGY IS DIRECTLY AFFECTED BY AN EFFECT OF THE SUBJECT MATTER OF THE SUBMISSION THAT –

- I. **ADVERSELY AFFECTS THE ENVIRONMENT; AND**
- II. **DOES NOT RELATE TO TRADE COMPETITION OR THE EFFECTS OF TRADE COMPETITION.**

Signed for and on behalf of Z Energy Limited



Sarah Westoby
Principal Planner

Date this 14 December 2022

Schedule A

Table 1: Z Energy Submission to the Timaru PDP

Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
Part 1 – Introduction and General Provisions				
INTERPRETATION – Definitions				
1	Hazardous Facility <i>a facility or activity that involves the use, storage or disposal of any hazardous substance.</i> (with a number of listed exceptions)	Support	With a number of listed exceptions, hazardous facilities, include a facility or activity that involves the use, storage or disposal of any hazardous substance. Z Energy’s retail service station and truck stop sites would be considered Hazard Facilities. This definition is supported noting that it is used in relation to specific activities and specific environments throughout the PDP, rather than blanket hazardous substance controls.	Retain the definition as notified
2	Major Hazard Facility <i>means a facility or activity that has been designated by Worksafe as a lower tier major hazard facility or an upper tier major hazard facility under the Health and Safety at Work (Major Hazard Facilities) Regulations 2016</i>	Support	Z Energy supports the definition of Major Hazard Facility in the PDP which recognises that land use planning can be important for these facilities, which may generate off site risk	Retain the definition as notified
Part 2 – District Wide Matters				
ENERGY, INFRASTRUCTURE AND TRANSPORT - TRAN – Transport				
3	Objective TRAN-O1	Support	Objective TRAN-O1 is supported as it broadly promotes resilience to the effects of climate change and a	Retain Objective TRAN-O1 as notified.


Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
			reduction in greenhouse gas emissions through clauses 1 and 2.	
4	New Policy	Support with amendments	<p>The suite of proposed Transport policies does not clearly relate to the Chapter’s clear intent (through proposed permitted Rule TRAN-R9) to encourage or enable EV charging facilities in all zones.</p> <p>Z Energy anticipates the use of electric vehicles (EVs) will be important to help achieve the Council’s greenhouse gas reduction and climate change goals (Refer Objective SD-O3).</p> <p>A new policy that encourages the provision of charging stations for electric vehicles is required.</p>	<p>Include a new Policy as follows:</p> <p><u>Encourage existing and new land uses to support an integrated and sustainable transport network by:</u></p> <p>a) <u>Enabling charging stations for electric vehicles.</u></p>
5	TRAN-R9 – Installation of new or replacement charging facilities for electric vehicles	Support with amendment	<p>Z supports permitting new or replacement charging facilities for electric vehicles in all zones.</p> <p>It is unclear whether this rule overrides other rules in the zone chapters. For example, the Road Setback standards in the residential zones. It is not necessary to require such infrastructure to comply with underlying zone standards such as yard setbacks etc. An amendment is sought accordingly.</p>	<p>Retain Rule TRAN-R9 as notified with an amendment as follows.</p> <p><u>Note: any activity under TRAN-R9 does not have to comply with underlying zone rules/standards.</u></p>

Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
6	TRAN-S1 - Landscaping where five or more at grade car parking spaces are provided for non-residential activities on a site	Oppose in Part	<p>Standard TRAN-S1 requires landscaping, of a very particular standard, where <i>'five or more at grade car parking spaces are provided for non-residential activities on a site'</i>, in all zones.</p> <p>Landscaping is required to be installed with a minimum dimension of 1.5m and immediately adjacent to car parking, plus a number of additional detailed requirements. Z Energy considers that many of these design requirements will not be appropriate or achievable in many circumstances, including, for example, where changes to an existing established service station are proposed or where there may be five or more car parking spaces on a site, but they're not laid out in a row on the site. The latter is often the case at existing service stations where parking is commonly dispersed around site boundaries, and where a number may be adjacent to the shop building if there is one.</p> <p>Integrating landscaping with the stormwater management system is also not appropriate in many cases, in particular at service stations. Low-impact design is difficult to achieve at service station sites. Good industry practice involves stormwater systems designed in accordance with the MfE guidelines for water discharges.</p> <p>Z seeks clarification that this standard does not apply to:</p>	<p>Amend Standard TRAN-S1 by adding an exclusion after clause 6 as follows:</p> <p><u>Note 1: This standard does not apply to Car Parks for EV Charging Stations.</u></p>

Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
			<ul style="list-style-type: none"> • refuelling lanes at existing or proposed service stations, • where there may be more than five non residential car parking spaces but those spaces are dispersed throughout a site. <p>Z seeks exclusions to the standard relevant to EV activities.</p> <p>It is also unclear whether Transport Standard TRAN-S1 (discussed in the row below) is relevant to an activity under Rule TRAN-R9. There are likely to be situations where five or more car parking spaces are proposed/existing with new EV charging facilities to be installed. The location of the EV charging structures needs to be located at the ‘front end’ of the car parking space(s) so that vehicles can plug in. This functional design requirement means that land at the front of car parking spaces cannot be landscaped in accordance with TRAN-S1.</p>	
7	TRAN-S20 – High Trip Generating Activities	Support in Part	<p>As it reads, if the thresholds in TRAN-S20 are met or exceeded, an RDA resource consent is required that needs an Integrated Transport Assessment (ITA) to support the application.</p> <p>Under Table 21 in the Standard, a basic ITA is required for service stations with 2 (or more) filling points and a full ITA is required for a service station with 6 filling points or greater.</p>	<p>Amend Table 21 in Standard TRAN-S20 as follows:</p> <p>New <i>Service Stations - ...</i></p>

Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
			<p>Z Energy supports the standard in part however seeks clarification that the thresholds (and therefore the standard) need only be considered/applicable where new or expanded existing activities are proposed. I.e.: that the standard only relates to new service stations, or to existing activities that are expanded by the thresholds in the table.</p> <p>Z seeks to ensure that the standard is not triggered by, for example, the installation of 1 x additional fuel dispenser, existing site upgrades or redevelopment of the same character and intensity.</p>	
SASM – SITES AND AREAS OF SIGNIFICANCE TO MĀORI				
8	SASM-O1-O3 SASM-P1-P8 SASM-R1 (PER-1) SASM4 in Schedule 6A	Support in part	<p>Chapter SASM relates to the mapped sites and areas of significance to Māori. These areas are very broad. Z Energy recognises that the RMA does not mandate consultation and that consultation should not replace the Council’s own RMA obligations (e.g.: in respect of Section 8 RMA). In that context, Z Energy generally supports the encouragement for consultation with Kāti Huirapa where it is appropriate and necessary and considers that amendments are required to ensure that consultation is meaningful and effective.</p> <p>The policy and rules framework should be appropriately tied into the <i>values</i> of the site or area that has been recognised. It should, for example, be very clear what values are to be maintained, enhanced</p>	<p>Amend the description for SASM4 in Schedule 6A to provide more clarity regarding the specific values of the area, including definitions for all values.</p> <p>Amend the policy and rule framework so that it is appropriately tied into the values of the site or area that has been recognised.</p> <p>Clarify the circumstances under which Rule SASM-R1 (PER-1)</p>

Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
			<p>or protected, so that a reasonable and informed decision can be made as to not only the extent to which consultation is considered necessary, but also to what extent the outcome of any consultation is necessary and appropriate.</p> <p>There is a disconnect between how SASM4 in Schedule 6A is described, in terms of its value to Māori and the general encouragement in SASM-P2 for consultation as being the most appropriate way to obtain understanding of the potential impact of any activity on the site or area (our emphasis).</p> <p>Similarly, SASM-P4 seeks to maintain existing access, and to encourage landowners and applicants to explore opportunities and methods to enhance access to the sites and (general) areas of significance. The appropriateness of seeking to enhance access on private land over private per se is questioned.</p> <p>Furthermore the link between the rules and the effects of an activity need to be established. In PER-1, for example, is the 750m² limit calculated on a staged basis or across the site. Does it apply over a 12-month period or the life of the plan?</p> <p>Clarification and amendments are sought accordingly.</p>	<p>earthworks applies (e.g.: per project, 12-months, staging?).</p>
Part 3 – Area Specific Matters				
Mixed Use Zone (MUZ)				



Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
9	Z Caroline Bay Service Station 62 Theodosia St, Timaru 	Support	Z Energy supports the MUZ zoning of this site.	Retain the zoning of the site at 62 Theodosia Street.
10	Mapping SHF-8	Oppose	Z Caroline Bay was previously identified and scheduled in the Draft Plan as an SHF (identifier SHF-8). Z requested that Z Caroline Bay was removed from the schedule in their response to the Draft Plan. The SHF schedule has been removed altogether from the PDP which is supported. The PDP text document(s) makes no reference to SHF's nor SHF-8, however there is still a notation on the PDP maps (see image above). It has been confirmed with TDCs policy team via a phone conversation that this is an error and therefore it is requested that the notation is removed.	Remove SHF-8 notation from PDP Maps
11	Objective MUZ-O1	Support	Z Energy supports Objective MUZ-01 which provides for a wide range of activities, <i>including commercial activities, community facilities, educational facilities, residential activities, and existing industrial activities, in a manner that reinforces the Timaru City Centre as the district's key commercial and civic centre.</i>	Retain Objective LFRZ-O1 as notified.

Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
			Service stations are an activity that require somewhat of a larger yard area and have specific functional needs meaning it can be difficult to locate them in some of the other commercial centres (for example: centres that adopt a ‘high street retail’ type approach).	
12	Policy MUZ-P2	Support	<p>Z Energy generally supports the provisions in Chapter LFRZ including the provision for allowing Commercial activities.</p> <p><i>P2 seeks to provide for commercial activities (excluding retail activities), educational facilities and community facilities that will help ensure that the Timaru City Centre remains the district’s key focal point for social, cultural and economic activities.</i></p> <p>Service stations are such activities and have specific functional needs meaning it can be difficult to locate them in some of the other commercial centres (for example: centres that adopt a ‘high street retail’ type approach).</p>	Retain Policy LFRZ-P2 as notified.
13	Rule MUZ-P1	Support	Rule MUZ-P1 permits Commercial Activities ¹ (excluding retail activities) subject to one standard that relates to outdoor storage (S4 – see below).	Retain Rule MUZ-P1 as notified.


¹ means any activity trading in goods, equipment or services. It includes any ancillary activity to the commercial activity (for example administrative or head offices).

Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
			<p>Retail Activities² specifically excludes service stations in the definition which is supported.</p> <p>Z Energy, therefore, supports Rule MUZ-P1 as it permits service stations as they would fall to be a Commercial Activity by definition.</p>	
14	Standard MUZ-S4	Support with amendment	<p>MUZ-S4 (goods storage) requires the following:</p> <p><i>Any outdoor storage areas, except for the display of goods for retail sale, must be fully screened by a fence of not less than 2m in height so that it is not visible from adjoining sites and roads.</i></p> <p>A 2m high fence would not be able to screen outdoor storage that is located at ground level from persons occupying a first floor or above on adjoining sites and in such circumstances, activities run the risk of not meeting the standard without clarification. On this basis, an amendment is sought.</p>	<p>Amend Standard MUZ-S4 as follows:</p> <p><i>Any outdoor storage areas, except for the display of goods for retail sale, must be fully screened by a fence of not less than 2m in height so that it is not visible from the ground level of adjoining sites and roads.</i></p>
Town Centre Zone (TCZ)				
15	Z Temuka Service Station 46 King Street, Temuka	Support	<p>Z Energy supports the zoning of this site.</p> <p>The Historic Character Area notation over Z Temuka has been removed from the Draft zoning maps which is supported. Z Energy's feedback to the Draft Plan commented that the overlay appeared erroneous.</p>	<p>Retain the zoning of the site at 46 King Street, Temuka, including not identifying the site as an 'historic character area'. Z Energy otherwise oppose this matter if it is sought to be readded to the PDP.</p>


² means any activity that involves the display or offer for sale or hire to the public of goods, merchandise or equipment and any ancillary work rooms. It includes general retail, large format retail, and trade and yard based retail, but excludes service stations.

Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
			<p>The zoning is considered appropriate in a wider sense but there is an inherent tension between service stations and zonings that are pedestrian and streetscape orientated. Service stations are by nature vehicle orientated and whilst these developments can be attractive, they have functional requirements which mean that they do not conform to traditional “streetscape” standards (e.g.: provision of verandahs and building to the front boundary). The comments below to objectives and policies of this chapter address this matter.</p>	
16	<p>Z Geraldine Service Station Cnr Waihi Terrace & Pine St, Geraldine</p> 	Support	<p>Z Energy supports the zoning of this site in general.</p> <p>The zoning is considered appropriate in a wider sense but there is an inherent tension between service stations and zonings that are pedestrian and streetscape orientated. Service stations are by nature vehicle orientated and whilst these developments can be attractive, they have functional requirements which mean that they do not conform to traditional “streetscape” standards (e.g.: provision of verandahs and building to the front boundary). The comments below to objectives and policies of this chapter address this matter.</p>	Retain the zoning of the Z Geraldine Service Station site.
17	Objective TCZ-01	Support	Objective TCZ-01 provides for a diverse range of commercial activities that support the township and surrounding rural areas. This is supported.	Retain Objective TCZ-01 as notified.

Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
18	Policy TCZ-P4	Oppose in Part	<p>Z Energy does not support the focus in the policies on maintaining “streetscape character and pedestrian amenity”, notably by requiring verandahs to be provided along street frontages.</p> <p>Policy TCZ-P4 only provides for an exception where their provision or design would detract from heritage values of scheduled heritage items, historic heritage areas or historic character areas. This fails to recognise that there are some areas where development on the main street frontages in Temuka and Geraldine, does not currently meet these “streetscape” type criteria and where, for existing activities at least, such provision would be unreasonable. Service station have a functional requirement to be designed in the manner they are and it is unreasonable for such existing service stations to provide a verandah with a development proposal at the site.</p>	<p>Amend Policy TCZ-P4 as follows</p> <p><i>Maintain streetscape character and pedestrian amenity in the principal shopping areas by requiring in:</i></p> <p><i>1. Temuka and Geraldine, the provision of a verandah along main street frontages except where the activity involves an existing service station, and ensuring that the design of any verandah maintains or enhances the character of the street; and...</i></p>
19	Rule TCZ-R1	Support	<p>Rule TCZ-R1 provides for commercial activities as permitted activities but specifically excludes service stations (by activity specific Performance Standard PER-1).</p> <p>The activity status for activities not complying with PER-1 (ie: for activities that are service stations) is specifically stated to be discretionary. Z Energy supports the discretionary activity status for service stations, being an activity that does not meet PER-1 of TCZ-R1.</p>	<p>Retain Rule TCZ-R1 as notified</p>

Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
20	Rule TCZ-R6	Support	Compliance with the general performance standards would be required if the activity involves buildings and structures (Rule TCZ-R6). Non-compliance with those performance standards triggers restricted discretionary consent, and that is also supported.	Retain Rule TCZ-R6 as notified.
21	Standard TCZ-S5	Support	Z Energy supports Standard TCZ-S5 because the standard does not apply if the building is set back from the road boundary a distance equal to or greater than the width of a verandah that could comply with 2(a) of the standard.	Retain TCZ-S5 as notified.
General Industrial Zone (GIZ)				
22	Z Washdyke TS 55 Sheffield St, Washdyke 	Support	Z Energy supports the zoning of this site.	Retain the zoning of the site at 55 Sheffield Street.
23	Rule GIZ-R1 PER-1 PER-3	Support in part Oppose Support	Service Stations are a permitted activity in the General Industrial Zone (GIZ) under Rule GIZ-R1 which is supported in principle.	Retain Rule GIZ-R1 that permits service stations. Delete PER-1

Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
			<p>Any buildings or structures must be located more than 50m from any residential zone under PER-1. The standard is not effects based and is not supported.</p> <p>PER-3 is supported in that it makes it clear that activities under GIZ-R1 must comply with all relevant standards in the chapter to maintain the PA status.</p> <p>Service Stations are a restricted discretionary activity where there is non-compliance with the general development standards which is supported.</p>	Retain PER-3 as notified.
24	Standard GIZ-S4 (building colour and reflectivity)	Oppose in Part	<p>Standard GIZ-S4 (building colour and reflectivity) restricts the colour palate of buildings where there is visibility from and within the General Residential Zone to green, grey or tertiary (brown). While the buildings at a Z Energy branded service station sites are often finished in a mineral brown, brand colours are used in the buildings features and also along the canopy edge. The intent of the Matters Of Discretion is not clear: for example, how does a restriction to green, grey or tertiary brown (irrespective of shade) achieve a level of visual amenity that cannot be achieved with any other colour?</p>	<p>Amend the general performance standard relating to building colour and reflectivity (GIZ-S4) to remove the restriction on colour as follows:</p> <p>1. The façade(s) of any building that is visible from and within 50 metres of the General residential zone must be painted or finished in a green, grey or tertiary (brown) colour and have a reflectivity value not exceeding 25%;</p>
25	Standard GIZ-S5 (outdoor storage)	Support	<p>GIZ-S5 (outdoor storage) requires screening of outdoor storage areas and applies to ground level views only. This is supported.</p>	Retain GIZ-S5 as notified.
	Large Format Retail Zone (LFRZ)			

Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
26	<p>Caltex Stafford St 32 Stafford St, Timaru</p> 	Support	Z Energy supports the LFRZ zoning of this site.	Retain the zoning of 32 Stafford St, Timaru
27	Objective LFRZ-O1	Support	Z Energy supports Objective LFRZ-O1. Service stations are an activity that require somewhat of a larger yard area and have specific functional needs meaning it can be difficult to locate them in some of the other commercial centres (for example: centres that adopt a 'high street retail' type approach). Service stations do not have an adverse impact on the retail hierarchy and operate in a supportive manner to large-scale retail activities, in accordance with the intent of Objective O1.	Retain Objective LFRZ-O1 as notified.
28	Objective LFRZ-O2(3)	Support in part	LFRZ-O2(3) is supported in part however is considered too restrictive given the broader allowances identified in Objective O1 including trade suppliers and ancillary activities. It is important to recognise that the zone	Amend Objective LFRZ-O2(3) as follows: <i>The Large Format Retail Zone:</i> ...

Sub Point	Section / sub-section / provision	Position (Support/Support in Part/Neutral/Oppose in Part/Oppose)	Submission	Relief sought
			contains / provides for buildings that require larger yard areas.	<i>3. contains buildings that have large gross floor areas <u>and/or require larger yard areas.</u></i>
29	Policy LFRZ-P6	Support	Z Energy generally supports the provisions in Chapter LFRZ including the provision for allowing other activities that still ensure the primary use of the zone is for large scale retail activities (including Policy LFRZ-P6). Service stations are such activities as they require larger yard areas, have specific functional needs meaning it can be difficult to locate them in some of the other commercial centres (for example: centres that adopt a 'high street retail' type approach). Service stations do not have an adverse impact on the retail hierarchy.	Retain Policy LFRZ-P6 as notified.

Michelle Reeves

From: Mollie Keaney <Mollie.Keaney@4sight.co.nz>
Sent: Wednesday, 14 December 2022 11:55 am
To: PDP
Subject: Z Energy Submission to the Timaru PDP
Attachments: Z Energy Submission to the Timaru PDP.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Acknowledged not profiled on CRM9, Attempted to profile 15/12/2022

Kia ora,

On behalf of Z Energy please find attached a submission to the Timaru PDP.

Please acknowledge receipt of this submission.

Ngā mihi,
Mollie Keaney