



Timaru District Council  
2 King George Place  
Timaru 7910  
Phone: 03 687 7200

## Further submission in support of, or in opposition to, submission on the Proposed Timaru District Plan

Clause 8 of Schedule 1, Resource Management Act 1991

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Further submissions close on **Friday 4 August 2023 at 5pm**

To: **Timaru District Council**

This is a further submission in support of, or in opposition to, a submission on the **Proposed Timaru District Plan**.

**Full name of person making further submission:**

[Z Energy Limited](#)

**Organisation name and contact** (if representing a group or organisation):

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**Only certain persons can make a further submission. Please select the option that applies.**

**I am:**

- a person representing a relevant aspect of the public interest;
- a person who has an interest in the proposal that is greater than the interest the general public has;
- the local authority for the relevant area.

Please explain why you come within the category selected above:

[Z Energy's interest in the PDP is greater than that of the general public, being an original submitter on the PDP with respect to their retail fuel outlets and bulk storage facilities in the District.](#)

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## Hearing options

I wish to be heard in support of my further submission?  Yes  No

If others make a similar further submission, I will consider presenting a joint case with them at a hearing.

Yes  No

Signature:  Date: [03/08/2023](#)

*(of person making submission or person authorised to make decision on behalf)*

**PLEASE NOTE** - A signature is not required if you submit this form electronically. By entering your name in the box above you are giving your authority for this application to proceed.

**Electronic address for service of person making further submission:** [thomas.trevilla@4sight.co.nz](mailto:thomas.trevilla@4sight.co.nz)

**Telephone:** 020 400 06702

**Postal address (or alternative method of service under section 352 of the Act):**

[201 Victoria Street West, Auckland Central, Auckland 1010](#)

**Contact person:** *[name and designation, if applicable]:* [Thomas Trevilla](#)

**You have served a copy of the further submission on the original submitter (this is required under the Resource Management Act 1991 Schedule 1, s8A(2) to be completed within 5 working days after it is served on the Timaru District Council)**

Yes    No

**Further submissions close on Friday 4 August 2023 at 5pm.**

**FURTHER SUBMISSION ON THE PROPOSED TIMARU DISTRICT PLAN PURSUANT TO  
CLAUSE 8 OF THE FIRST SCHEDULE OF THE RESOURCE MANAGEMENT ACT 1991**

**To:** Timaru District Council  
PO Box 522  
Timaru 7940

Attention: District Plan Team

Email: [pdp@timdc.govt.nz](mailto:pdp@timdc.govt.nz)

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

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

Attention: Thomas Trevilla

Phone: 020 400 06702  
Email: [thomas.trevilla@4sight.co.nz](mailto:thomas.trevilla@4sight.co.nz)

**Date:** 3 August 2023

## INTRODUCTION

1. Z Energy Limited (*Z Energy*) is a submitter (submission number 116) on the Proposed Timaru District Plan (*the PDP*).
2. Z Energy's further submission in support of / in opposition to original submissions on the PDP is set out in the appended Schedule A.

## ADMINISTRATIVE MATTERS

3. Z Energy's interest in the PDP is greater than that of the general public, being an original submitter on the PDP with respect to its retail fuel outlets and bulk storage facilities across the Timaru District (*the District*).
4. Z Energy could not gain an advantage in trade competition through this further submission.
5. Z Energy wishes to be heard in support of this further submission.
6. If others make similar submissions, Z Energy may be prepared to consider presenting a joint case with them at any hearing.

Signed on behalf of Z Energy Limited



Thomas Trevilla  
Planning and Policy Consultant  
**4Sight Consulting Limited**

3 August 2023

**SCHEDULE A: FURTHER SUBMISSION OF Z ENERGY LIMITED ON THE PROPOSED TIMARU DISTRICT PLAN**

Original submission					Further submission of Z Energy Limited		
Submitter	Submission number	Provision	Position	Summary of relief sought (for amendments, deletions are in <b>bold red strikethrough</b> while additions are in <b>bold red underline</b> )	Position	Reasons	Relief sought
Waka Kotahi NZ Transport Agency	143.173	GIZ-P1 Industrial activities	Amend	<p>Amend GIZ-P1 as follows:</p> <p>GIZ-P1 Industrial activities</p> <p>Enable a range of industrial activities and associated activities where:</p> <ol style="list-style-type: none"> <li>ancillary activities are conducted on the same site as the primary industrial activity; and</li> <li>does not include residential activities; and</li> <li><b><u>do not adversely affect the safe and efficient operation of the transport network; and</u></b></li> <li><del>3. 4.</del> they are compatible and complementary to the purpose, character and qualities of the General Industrial Zone.</li> </ol>	Oppose	Z Energy considers that the relief sought by the submitter for the Industrial Zone policy analysis will unnecessarily duplicate the function of the Transportation chapter's objectives (e.g., TRAN-O3), policies (e.g., TRAN-P7), rules and standards.	Disallow
Waka Kotahi NZ Transport Agency	143.174	GIZ-P2 Off-site industrial ancillary activities	Amend	<p>Amend GIZ-P2 as follows:</p> <p>GIZ-P2 Off-site industrial ancillary activities</p> <p>Only allow industrial ancillary activities on a different site of the primary industrial activity where:</p> <ol style="list-style-type: none"> <li>they are conducted on an adjoining or adjacent site as the primary industrial activity; and</li> <li>they do not undermine the purpose, viability and function of any of the Commercial and Mixed Use Zones; and</li> <li><b><u>they do not adversely affect the safe and efficient operation of the transport network; and</u></b></li> <li><del>3. 4.</del> they are compatible and complementary to the purpose, character and qualities of the General Industrial Zone.</li> </ol>	Oppose	Z Energy considers that the relief sought by the submitter for the Industrial Zone policy analysis will unnecessarily duplicate the function of the Transportation chapter's objectives (e.g., TRAN-O3), policies (e.g., TRAN-P7), rules and standards.	Disallow
Kāinga Ora	229.134	MUZ-S4 Goods storage	Amend	<p>Amend MUZ-S4 as follows:</p> <p>MUZ-S4 <del>Outdoor goods, refuse or recycling</del> storage</p> <p>Any outdoor storage areas, except for the display of goods for retail sale; <del>1.</del> <b><u>1.</u></b> 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; and</p> <p><b><u>2. must not be facing any site in a Residential Zone or containing an existing residential unit.</u></b></p> <p>Matters of discretion restricted to:</p> <ol style="list-style-type: none"> <li>visual effects; and</li> <li>landscaping and screening; <b><u>and</u></b></li> <li><b><u>residential amenity effects; and</u></b></li> <li><b><u>mitigation measures; and</u></b></li> </ol>	Oppose in part	<p>Z Energy opposes the insertion of clause (2) for the following reasons:</p> <ul style="list-style-type: none"> <li>It is unclear what "facing any site" means in the context of an outdoor storage area and a residential site.</li> <li>Its application to any site with an existing residential unit is too broad and could compromise the establishment of, or unnecessarily require resource consent for, permitted non-residential activities which the Zone principally provides for.</li> </ul> <p>Z Energy also opposes the insertion of matter of discretion (3). The inclusion of residential amenity effects is not appropriate as the scope of such effects is unclear (particularly as visual effects are what the standard already manages) and, as stated above, the Zone principally provides for non-residential activities.</p>	Disallow in part

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				<b><u>5. any alternative measures considered.</u></b>			
Kāinga Ora	229.168	GIZ-P1 Industrial activities	Amend	<p>Amend GIZ-P1 as follows:</p> <p>GIZ-P1 Industrial activities</p> <p>Enable a range of industrial activities and associated activities where:</p> <ol style="list-style-type: none"> <li>ancillary activities are conducted on the same site as the primary industrial activity; and</li> <li><b><u>the activity</u></b> does not include residential activities; and</li> <li>they are compatible and complementary to the purpose, character and qualities of the General Industrial Zone-; <b><u>and</u></b></li> <li><b><u>Offensive trades and hazardous facilities are not permitted to establish on a site, adjacent to another site with an open space and recreation, or residential zoning.</u></b></li> </ol>	Oppose in part	Z Energy opposes the insertion of clause (4) as it is not clearly effects based and would be inconsistent with the provisions of the Hazardous Substances chapter including the general permitted activity status afforded to Hazardous Facilities by HS-R1. It is also important to note that Hazardous Facilities, and hazardous substances, are comprehensively managed by a combination of district and regional plans, non-RMA statutes and regulations, industry best practice and site management plans. Some Hazardous Facilities can therefore be appropriately located near open space, recreational or residential zones.	Disallow in part - disallow clause (4)