

**BEFORE THE WAIKATO DISTRICT COUNCIL**

**UNDER** the Resource Management Act 1991

**AND**

**IN THE MATTER OF** an application to the Waikato District Council for resource consent to establish and operate a service station at 68 Great South Road, Pokeno.

---

**STATEMENT OF BELINDA ANNE MILNE  
ON BEHALF OF GULL NEW ZEALAND LIMITED**

**APPLICANT**

**19 APRIL 2021**

---

## **Introduction**

1. My name is Belinda Anne Milne. I am the Project Manager – Retail Development for Gull New Zealand Limited (Gull). I have worked for Gull for over 9 years and in my current role for 6 years. My role involves managing all aspects of the construction of new sites and redevelopment of existing sites, from land acquisition through to operation.

## **Scope of statement**

2. My statement will cover:
  - (a) Overview of Gull and comparative sites
  - (b) Operation of an unmanned service station
  - (c) Gull Effect
  - (d) Gull Discount Days
  - (e) Employment at Unmanned Service Stations

## **Overview of Gull and comparative sites**

3. There are currently 104 Gull branded sites from Kaitaia in the far North all the way down to Gore in the deep South. Gull's network includes 69 unmanned sites which operate 24 hours, 7 days per week. In over 10 years of operation, I am not aware of any significant council or public complaints (or enforcement action) relating to the traffic, noise, lighting or fugitive emissions from our unmanned sites.

## **Overview of an unmanned service station**

4. Gull was one of the first fuel companies to introduce 'unmanned sites' fully automated site in New Zealand over 10 years ago. Several competitors have since followed this operating model (e.g., Waitomo, NPD and Allied Petroleum) and today unmanned sites make up an increasing proportion of the total number refuelling sites in New Zealand.

5. An unmanned site is operated by customers using an Eftpos/Credit Card via an outdoor payment terminal (OPT) to first authorise the fuel transaction. Customers can nominate any required amount, or simply fill up to a maximum of \$200 per transaction, or circa. 75-100 litres of petrol or 150-200 litres of diesel. The customer selects the pump location and authorises the transaction. Once approved, they return to the selected pump and select the grade of fuel (i.e., Regular 91, Premium or Diesel) by lifting the labelled fuel grade nozzle handle from the pump to commence delivery. Once they hang up the nozzle the transaction is completed. If they wish they can return to any of the outdoor payment terminals to receive a transaction receipt.

#### *Emergencies*

6. Hazard boards are clearly displayed by all pumps to provide clear guidance for safe refuelling and include instructions for what to do in the unlikely event of an emergency i.e., dial 111. There is also an Emergency Procedures Board with further instructions including an Emergency Stop Button that can be activated by customers which stops all fuel delivery to all pumps and tanks immediately. Gull is electronically notified that the site is not operating and can investigate immediately via up to 16 CCTV cameras. There is also an 0800-number displayed on the dispensers and emergency procedures board for the customers to call should they encounter any issues with operating the dispensers, or for reporting any problems. This 0800 number is staffed 24/7 by an answering service (which defaults to an emergency being the first option available). The operator will then directly contact Gull staff and contractors (or emergency services) via email or phone depending on the severity of the problem.
7. Next to the Emergency Procedures Board is a fully equipped Spill Kit and dry powder fire extinguisher. The spill kit also contains a comprehensive Environmental Management Plan and Emergency Spill Response Plan. These plans are all approved by councils and are also currently being reviewed and

approved by Fire and Emergency New Zealand (FENZ) at all Gull unmanned sites.

#### *Site servicing*

8. Gull employs inducted and trained contractors to undertake daily site cleaning and inspections. They visit the site each day to check everything is in good working order and log service requests if there is something needing attention. They clean each dispenser/pump, OPT, empty the rubbish bins, replace receipt rolls and check the spill kit and fire extinguisher haven't been used and/or still located on site. The spill kit and fire extinguisher are both available 24/7 and are easily accessible and visible from the forecourt along with an Emergency Procedures board and Emergency STOP button. Contractors also manually monitors two observation wells to ensure the double skinned fibreglass underground storage tanks (UST's) are not leaking and carry out water dip tests on the tanks to ensure no water is getting into the fuel tanks. They visually check the drainage on site is working and not blocked.

#### *Protection measures*

9. The pump/dispenser's hoses are fitted with breakaway nozzles, the dispensers have shear valves underneath which automatically shut off should the nozzle be snapped off or the dispenser be pulled over or hit stopping any flow of fuel from continuing.
10. Underground storage tanks (UST's) are double skin fibreglass tanks. These are monitored by electronic tank gauging which sends readings from each tank every 15minutes, this is reconciled daily and with a more thorough reconciliation happening at end of each month and any product loss/gains outside strict tolerance levels are investigated further. Each site has an electronic monitoring and operating system set up that sends off alert emails to numerous people within Gull and select external contractors notifying them of unusual occurrences i.e., sudden stock losses, site not operating etc. Each tank has a Safe Fill Level and is also fitted with an shut off valve which doesn't

allow a fuel tanker to fill the tank to a level higher than what the Safe Fill level is set at. The site must be independently certified under HASNO regulations.

### *Fuel Deliveries*

11. Fuel Deliveries occur approximately 2 to 3 times per week. Each fill point and dip point are labelled by tags and ID rings both on forecourt and inside the cavity. These are locked when not in use by tanker drivers or site service contractors. All new Gull sites are built with Primary Vapour Recovery. Gull was one of the first fuel companies in New Zealand to introduce this technology at its sites. This limits any release of fuel vapour from the tank to the vent pipes during fuel delivery to the tanks. The tanker connects to our vapour recovery point during each delivery which circulates any vapour displaced back to the tanker capturing the vapour from the fuel drop – eliminating the petrol fumes venting during a delivery. The UST's are piped to vent pipes which essentially allows the tanks to breath – these vent pipes must be set back 1.5m from any property boundary or can be situated on the side of a building with the appropriate consideration to ventilation of building and ignition sources via a defined hazard zones around the vent pipes. Fugitive emissions from the vent pipes and during refuelling of vehicles does not require an air discharge consent as the short term and localised effects are negligible.

### *Security*

12. All sites have 4k high definition CCTV cameras installed which monitor each dispenser and access to and from the site along with visibility to our ID Sign and any other key areas on our site. This can be accessed 24/7 remotely by several Gull head office staff and select contractors. The footage from the site is capable of being stored for up to 30 days and for 15 minutes via battery back up in the event of a power cut. Gull has had to employ a part time contractor to regularly provide footage to NZ Police (on request) in relation to criminal activity or investigations, while not specifically related to the site per se, but as part of wider investigations. Offensive and unruly behaviour at nights is not a

documented concern at our existing unmanned sites in urban areas due to good lighting and CCTV recording.

### **Gull Effect**

13. The “Gull Effect” is a term coined by the AA after observing how opposition sites lower their fuel prices to match when a Gull site opens in the town or neighbourhood. Having a Gull in town provides competition and lower fuel prices for the community and in some regions we have seen the price reduced by as much as 20 – 30c per litre.

### **Gull Discount Days**

14. Discount days typically run from 7am through to midday the following day – giving our customers a window of 29 hours to purchase fuel at a discounted rate. Gull hold on average one discount day per month. The operating model of 24/7 allows our customers the freedom of knowing they can purchase the discounted fuel at any time over that period, which results in minimal queuing which is able to be contained within our sites. Human nature is not to wait in queues when you have the option of going to a nearby competitor, e.g., the g.a.s. site which is 50m from proposed site, as competitors will often match our discount. Or customers will come back when the site is quieter to fill up. Many of our customers on discount day are just wanting the best deal on fuel purchases, the perceived hype of a “Gull Discount Day” is often just that, with many of our competitors dropping their fuel prices to match ours, often enticing customers with their own incentive programs, e.g. AA Smartfuel & Pumped.
15. The concerns raised of traffic queuing on discount days is often raised during the resource consent process. However, to date we have not had a consent application declined for this or any other reason, nor have we received any official complaints from councils or local roading authorities around queuing on discount days. Our own evidence via recorded CCTV camera observations

clearly demonstrates that it simply is not the problem that submitters/councils perceive it to be. Gull's Discount Days are no different than the common sales practices that many other fuel retailers and retail businesses employ e.g., Briscoes sales, Black Friday/Boxing Day sales. I am not aware of this sales/discounting being a factor taken into consideration when assessing consents for these other retail activities and Gull simply requests a consistent and level playing field in assessing traffic effects.

16. We acknowledge that customer numbers do increase on discount days but our CCTV cameras confirm that traffic tends to self-regulate by way of human nature, i.e. customers not wishing to queue and deferring their purchasing decision to a more convenient time. This is supported by the evidence of independent traffic specialists Ian Constable.

#### **Employment at Unmanned Service Stations**

17. Gull employs contractors to service our unmanned site network country wide. Each site has an Ambassador for who are employed for a time for the opening period, helping new customers familiarise themselves with using the unmanned payment terminals and dispensers. Up to 4 Ambassadors are employed (more for our larger sites) for a period of up to 8 weeks. Hours are from 7am to 6pm seven days a week.
18. At the end of the opening period one or two Ambassadors are retained and offered permanent positions to service the site daily. The service provided daily includes cleaning of the dispensers & OPT's, refilling of receipt paper, emptying of bins, and making sure the site is in good working order. They are also responsible for reporting any issues with the site that requires repair or maintenance. The contractor additionally provide a water blasting service and undertake a thorough forecourt clean at least two times a year across our network.

19. Waydgo, our current contract company, was founded 8 years ago to specifically service unmanned service stations, it started with 2 employees and has grown to employ 65 staff directly and contracts out work when required, they are always actively recruiting for positions to meet the demands of an unmanned service stations. Gull makes up 65% of their business. Many of there staff will be local residents of the specific area they service.
20. As the number of unmanned service stations grow and our network expands around the country so do our contractors businesses, employing more staff to service and carry out routine maintenance and repairs that are required to keep a service station running i.e., specialist petroleum contractors, electricians, signage, gardeners etc.
21. During construction a number of local sub-contractors are often employed for specific tasks, e.g. concrete forming, aggregate supply and drainage works. While Gull's unattended service stations do not create additional onsite staff (other than contractors) compared to traditional service stations, we prefer to focus on the overall economic benefit to the wider community by increasing competition and leaving more money in local residents' pockets. A study completed when Gull opened the Pukekohe site estimated an annual saving of over \$120/customer per annum when pricing was compared with existing service stations prices.

Belinda Anne Milne

19 April 2021