

12 November 2020

### **Submission on Porirua City Proposed District Plan**

Porirua City District Council  
Proposed District Plan | Environment and City Planning  
PO Box 50-218  
Porirua

#### **Name of Submitter:** Bunnings Limited (“Bunnings”)

1. Bunnings makes this submission on the Porirua City Proposed District Plan (“PDP”) in accordance with Clause 6 of the First Schedule of the Resource Management Act (“RMA”) 1991 as follows.
2. Bunnings could not gain advantage in trade competition through this submission.
3. Bunnings is directly affected by effects of the subject matters of the submission that –
  - a. Adversely affects the environment; and
  - b. Do not relate to trade competition or the effects of trade competition.
4. Bunnings wish to be heard in support of their submission.
5. If any other submitters make a similar submission, Bunnings will consider presenting a joint case with them at the hearing.

#### **Overview of Bunnings**

6. Bunnings is one of the leading retailers of home improvement and outdoor living products in Australasia and services both consumer and commercial customers. Bunnings operates a number of warehouses, smaller format stores, and trade centres throughout New Zealand, along with a distribution centre and a head office. Bunnings operates 27 warehouses, 19 smaller format stores and 8 trade centres throughout New Zealand, along with a distribution centre and a head office. These sites are carefully designed to be fit for purpose and planned to a very high standard.
7. In Bunnings’ experience, regional and district planning frameworks often do not properly recognise the need for business growth to occur, especially alongside residential growth. Given Bunnings’ significant past and planned further investment in New Zealand, the content of these and any future District Plan provisions will be important to the continuing operation and development of Bunnings’ in Porirua.

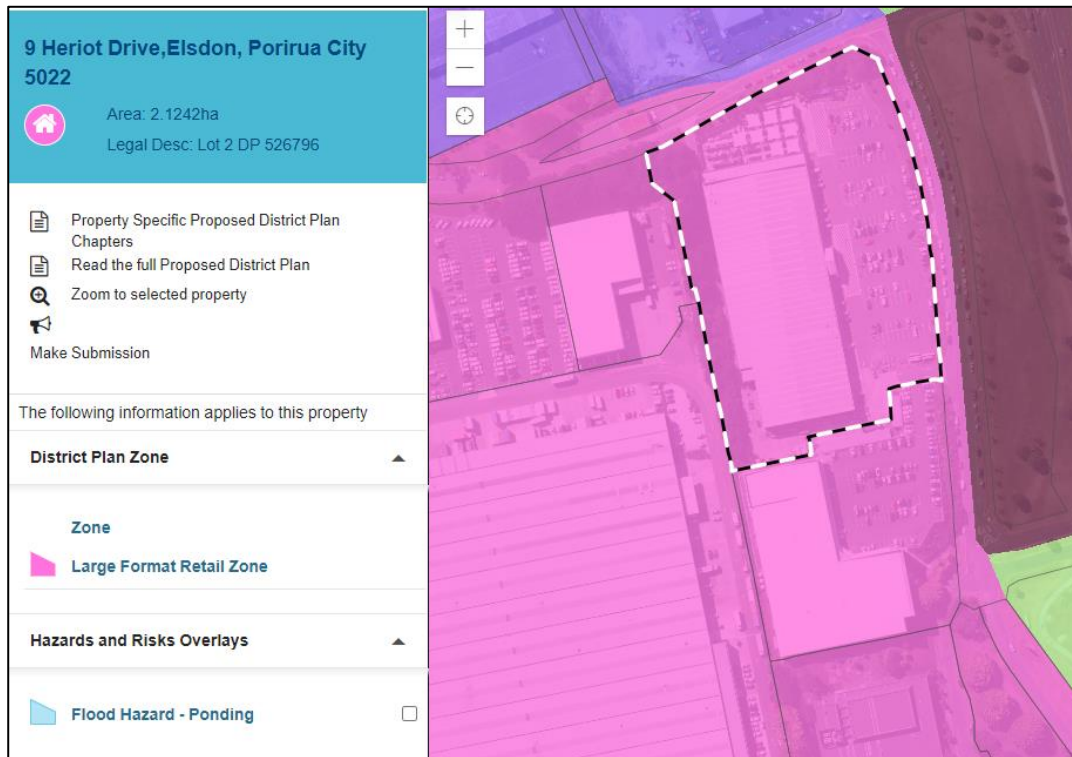


Urban & Environmental

8. The existing Bunnings Warehouse store in Porirua is located at 9 Heriot Drive, Elsdon and will be subject to the provision of the PDP. Bunnings is therefore directly affected by the PDP and has an interest on the outcome greater than the general public.

**Submission**

9. Bunnings current store location in the Porirua City area is given below:



Site	PDP Zone	PDP Special Features	Submission
Bunnings Warehouse Porirua (9 Heriot Dr)	Large Format Retail Zone	None applicable	Support and retain as notified

10. Bunnings makes the following submission points as set in **Attachment 1** overleaf.

**Address for Service:**

Barker & Associates Ltd  
 Attn: Matt Norwell / Mary Wong  
 PO Box 1986  
 Shortland Street  
 Auckland 1140

Contact Number: 029 850 2780 / 021 0310291  
 Email: [mattn@barker.co.nz](mailto:mattn@barker.co.nz) / [maryw@barker.co.nz](mailto:maryw@barker.co.nz)



**Copied to:**

Bunnings Limited

c/- Dean Williams – Development Approvals Manager

[dwilliams@bunnings.co.nz](mailto:dwilliams@bunnings.co.nz)

**Attachment 1:** The specific submission points on the Porirua City Proposed District Plan that this submission relates to are as follows.

Note ~~strikethrough~~ text represents text proposed to be deleted and **bold** text represents text proposed to be inserted.

PDP Reference	Submission / Reasons	Support/Oppose	Relief Sought
<b>Part 1: Introduction and General Provisions</b>			
Definitions Nesting Table	Bunnings supports the “Definitions Nesting Tables” approach in Part 1 of the PDP because it is a logical method for organising different land use activities in a broader term.	Support	Retain definitions nesting table as notified.
‘Trade supplier’ nesting table	Bunnings supports the provision of ‘trade supplier’ as a specifically nested term in the definitions nesting table.	Support	Retain ‘trade supplier’ nesting table as notified.
‘Retail activities’ nesting table	The operational nature of Bunnings activities is such that they are considered to be ‘retail activities’ under this broad term. However, Bunnings considers that this level of specificity, and for the avoidance of doubt, should include ‘trade suppliers’ as a type of retail activity listed in this nested term.	Support in part	Amend the nested term of ‘retail activities’ to specifically include ‘trade supplier’ as given below.  “Retail activities” <ul style="list-style-type: none"> <li>• Clothing and footwear</li> <li>• Homeware</li> <li>• Jewellery</li> <li>• Antiques, used goods and charity shops</li> <li>• Recreational goods and sports stores</li> <li>• Electrical goods</li> <li>• Dairies</li> <li>• Bakeries</li> <li>• <b>Trade supplier</b>”</li> </ul>
‘Trade supplier’ definition	Bunnings supports the provision of a ‘trade supplier’ definition under the PDP.	Support	Retain definition for “trade supplier” as notified.
<b>Part 3: Area Specific Matters</b>			
<b>NCZ – Neighbourhood Centre Zone</b>			
NCZ-R19 Trade Supplier	Non-complying activity	Support	Retain rule NCZ-R19 Trade Supplier as a non-complying
NCZ-S7 Screening and landscaping of service areas, outdoor storage areas and parking areas	Bunnings supports the approach in principle to provide screening or landscaping around service, outdoor storage and parking areas to ensure that an appropriate level of inter-site amenity with adjacent sites is achieved. However, as a rule, is considered that greater specificity can be introduced in terms of the requirement to be achieved and clearly demonstrate compliance or not.	Support in part	Amend NCZ -S7 Screening and landscaping of service areas, outdoor storage areas and parking areas as follows:  1. Any on-site service areas, including rubbish collection areas, and areas for the outdoor storage of goods or materials must, without preventing the provision of an entry point to the site, be <del>fully</del> <b>adequately</b> screened by a <b>1.8m</b> fence or <b>2m</b> landscaping <b>buffer</b> where they are visible from any: <ul style="list-style-type: none"> <li>a. Public road;</li> <li>b. Other public space; and</li> </ul>

			<p>c. Directly adjoining site zoned General Residential, Medium Density Residential, Open Space or Sport and Active Recreation.</p> <p>2. Any on-site parking areas must be <b>fully adequately</b> screened by a <b>1.8m</b> fence or <b>2m</b> landscaping <b>buffer</b> from any directly adjoining site zoned General Residential, Medium Density Residential, Open Space or Sport and Active Recreation.</p>
<b>LCZ – Local Centre Zone</b>			
LCZ-R19 Trade Supplier	<p>Bunnings opposes the non-complying activity status for trade suppliers in the Local Centre Zone (LCZ). Trade suppliers are considered to be a form of retail activities notwithstanding that it is a separately nested term in the definitions section of the PDP. The zone description for the LCZ states the following, note <u>underlined</u> emphasis added:</p> <p><i>“Local Centres are medium-scale commercial centres that are located conveniently to service the needs of the surrounding residential catchment. They provide for <u>a range of retail, commercial and community activities</u>, and offer services, employment and living opportunities. These can include supermarkets and medical centres.”</i></p>	Oppose	Delete rule LCZ-R19 Trade suppliers as a non-complying activity. Insert new rules providing for trade suppliers as a discretionary activity in the LCZ.
LCZ-S7 Screening and landscaping of service areas, outdoor storage areas and parking areas	<p>Bunnings supports the approach in principle to provide screening or landscaping around service, outdoor storage and parking areas to ensure that an appropriate level of inter-site amenity with adjacent sites is achieved.</p> <p>However, as a rule, is considered that greater specificity can be introduced in terms of the requirement to be achieved and clearly demonstrate compliance or not.</p>	Support in part	<p>Amend LCZ-S7 Screening and landscaping of service areas, outdoor storage areas and parking areas to be read as follows:</p> <p>1. Any on-site service area, including rubbish collection areas, and area for the outdoor storage of goods or materials must, without preventing the provision of an entry point to the site, be <b>fully adequately</b> screened by a <b>1.8m</b> fence or <b>2m</b> landscaping <b>buffer</b> where they are visible from any:</p> <ul style="list-style-type: none"> <li>a. Public road;</li> <li>b. Other public space; and</li> <li>c. Directly adjoining site zoned General Residential, Medium Density Residential, Open Space or Sport and Active Recreation.</li> </ul> <p>2. Any on-site parking area must:</p> <ul style="list-style-type: none"> <li>a. Be <b>fully adequately</b> screened by a <b>1.8m</b> fence or <b>2m</b> landscaping from any directly adjoining site zoned General Residential, Medium Density Residential, Open Space or Sport and Active Recreation.</li> <li>b. Where located along a street edge, provide a landscaping strip that extends at least 1.5m from the boundary with the road and comprise a mix of trees, shrubs and ground cover</li> </ul>

			<p>plants, without preventing the provision of an entry point to the site.</p> <p>Except that:</p> <ul style="list-style-type: none"> <li>The landscaping requirement for on-site parking areas along a street edge does not apply to individual parking spaces for residential development, if provided.</li> </ul>
<b>LFRZ – Large Format Retail Zone</b>			
LFRZ-R7 Trade supplier	Bunnings supports the permitted activity status for trade suppliers in the LFRZ.	Support	Retain rule LFRZ-R7 Trade suppliers as notified.
LFRZ-R9 Retail activity	Bunnings supports the permitted activity status for retail activities in the LFRZ.	Support	Retain rule LFRZ-R9 Retail activity as notified.
LFRZ-S6 Screening and landscaping of parking areas	Bunnings supports the approach in principle to provide screening or landscaping around parking areas to ensure that an appropriate level of inter-site amenity with adjacent sites is achieved. However, as a rule, is considered that greater specificity can be introduced in terms of the requirement to be achieved and clearly demonstrate compliance or not.	Support in part	<p>Amend rule LFRZ-S6 Screening and landscaping of parking areas to be read as follows:</p> <ol style="list-style-type: none"> <li>Any on-site parking area must be <b>fully adequately</b> screened by a <b>1.8m</b> fence or <b>2m</b> landscaping from any directly adjoining site zoned General Residential Zone, Medium Density Residential Zone, Open Space Zone or Sport and Active Recreation Zone.</li> <li><del>At least 5% of any ground level parking area not contained within a building must be landscaped.</del></li> <li>Where a ground level parking area adjoins the street edge, a landscaping strip must be provided along the street edge, that extends at least 1.5m from the boundary with a road and comprise a mix of trees, shrubs and ground cover plants, without preventing the provision of an entry point.</li> </ol>
LFRZ-S7 Service areas and outdoor storage	Bunnings supports the approach in principle to provide screening or landscaping around service, areas and outdoor storage to ensure that an appropriate level of inter-site amenity with adjacent sites is achieved. However, as a rule, is considered that greater specificity can be introduced in terms of the requirement to be achieved and clearly demonstrate compliance or not.	Support in part	<p>Amend rule LFRZ-S7 Service areas and outdoor storage to be read as follows:</p> <ol style="list-style-type: none"> <li>Any on-site service area, including rubbish collection areas, and outdoor storage of goods or materials must, without preventing the provision of an entry point to the site, be <b>fully adequately</b> screened by a <b>1.8m</b> fence or <b>2m</b> landscaping where it is visible from any: <ul style="list-style-type: none"> <li>Public road;</li> <li>Other public space; and</li> <li>Directly adjoining site zoned General Residential, Medium Density Residential, Open Space or Sport and Active Recreation.</li> </ul> </li> </ol>
<b>MUZ – Mixed Use Zone</b>			

MUZ-R3 Retail activity	Bunnings supports the permitted activity status for retail activities in the Mixed Use Zone.	Support	Retain rule MUZ-R3 as notified.
MUZ-R16 Trade supplier	<p>Bunnings supports the restricted discretionary activity status trade suppliers in the Mixed Use Zone. However, Bunnings considers does not support limited the GFA of trade suppliers to 1,500m<sup>2</sup> in order to secure this permitted activity status.</p> <p>The store format of trade suppliers is such that they carry building products that are typically large in size and therefore larger building footprints are typically required to accommodate and store all the products. Bunnings store formats are usually larger than 1,500m<sup>2</sup> and would therefore require discretionary activity consent as a consequence which is considered to be an unnecessarily onerous activity status for the Mixed Use Zone.</p>	Support in part	<p>Retain rule MUZ-R16 as notified</p> <p>Delete ruleS MUZ-R16-1 and MUZ-R16.2 as notified</p>
MUZ-S6 Screening and landscaping of service areas, outdoor storage areas and parking areas	<p>Bunnings supports the approach in principle to provide screening or landscaping around service, outdoor storage and parking areas to ensure that an appropriate level of inter-site amenity with adjacent sites is achieved.</p> <p>However, as a rule, is considered that greater specificity can be introduced in terms of the requirement to be achieved and clearly demonstrate compliance or not.</p>	Support in part	<p>Amend rule MUZ-S6 Screening and landscaping of service areas, outdoor storage areas and parking areas to be read as follows:</p> <ol style="list-style-type: none"> <li>1. Any on-site service area, including rubbish collection areas, and area for the outdoor storage of goods or materials must, without preventing the provision of an entry point to the site, be <b>fully adequately</b> screened by a <b>1.8m</b> fence or <b>2m</b> landscaping where they are visible from any: <ol style="list-style-type: none"> <li>a. Public road;</li> <li>b. Other public space; and</li> <li>c. Directly adjoining site zoned General Residential Zone, Medium Density Residential Zone, Open Space Zone or Sport and Active Recreation Zone.</li> </ol> </li> <li>2. Any on-site parking area must: <ol style="list-style-type: none"> <li>a. Be <b>fully adequately</b> screened by a <b>1.8m</b> fence or <b>2m</b> landscaping from any directly adjoining site zoned General Residential, Medium Density Residential, Open Space or Sport and Active Recreation.</li> <li>b. If located along a street edge, provide a landscaping strip along the frontage, that extends at least 1.5m from the boundary with the road and comprise a mix of trees, shrubs and ground cover plants without preventing the provision of an entry point to the site.</li> </ol> </li> </ol> <p>Except that:</p> <ul style="list-style-type: none"> <li>• The landscaping requirement for on-site parking areas along a street edge does not apply to individual parking spaces for residential development, if provided.</li> </ul>

<b>CCZ – City Centre Zone</b>			
CCZ-R5 Retail activity	Bunnings support the permitted activity status for retail activities in the City Centre Zone.	Support	Retain rule CCZ-R5 Retail activity as notified.
CCZ-R15 New buildings and structures	Bunnings support the restricted discretionary activity status for new buildings and structures in the City Centre Zone, and the rule to preclude public notification of an application under this rule.	Support	Retain rule CCZ-R15 New buildings and structures as notified.
CCZ-R20 Trade Supplier	Bunnings supports the discretionary activity status for trade suppliers in the City Centre Zone.	Support	Retain rule CCZ-R20 Trade Supplier as notified.
CCZ-R19 Ground level parking and CCZ-S5 Location of Parking	<p>Bunnings opposes the rules pertaining to ground level parking and the location of parking which requires the provision of on-site car parking to be located within or at the rear of the building which it serves.</p> <p>These rules do not recognise the specific operational and functional requirement of activities which usually restricts the opportunity to provide parking at the rear of the building to comply with these standards while creating functional site layouts.</p>	Oppose	Delete rule CCZ-R19 Ground level parking and standard CCZ-S5 Location of Parking.
<b>GIZ – General Industrial Zone</b>			
GIZ-R13 Trade Supplier	Bunnings supports the permitted activity status for trade suppliers in the General Industrial Zone.	Support	Retain GIZ-R13 Trade Supplier as notified.
GIZ-S5 Screening and landscaping of service areas, outdoor storage areas and parking areas	<p>Bunnings supports the approach in principle to provide screening or landscaping around service, outdoor storage and parking areas to ensure that an appropriate level of inter-site amenity with adjacent sites is achieved.</p> <p>However, as a rule, is considered that greater specificity can be introduced in terms of the requirement to be achieved and clearly demonstrate compliance or not.</p>	Support in part	<p>Amend standard GIZ-S5 Screening and landscaping of service areas, outdoor storage areas and parking areas to be read as follows:</p> <p>1. Any on-site service area, including rubbish collection areas, and area for the outdoor storage of goods or materials must, without preventing the provision of an entry point to the site, be <b>fully adequately</b> screened by a <b>1.8m</b> fence or <b>2m</b> landscaping where they are visible from any:</p> <ul style="list-style-type: none"> <li>a. Public road;</li> <li>b. Site in the Residential Zone; or</li> <li>c. Site in the Open Space and Recreation Zone.</li> </ul>



**Correspondence between  
Council and submitter which  
forms part of this submission**

**Louise White**

---

**From:** Mary Wong <Mary.Wong@barker.co.nz>  
**Sent:** Thursday, 14 January 2021 1:34 PM  
**To:** Rory Smeaton; Matt Norwell  
**Cc:** dpreview  
**Subject:** [EXTERNAL] RE: Proposed Porirua District Plan - Clarification of relief sought by Bunnings for MUZ-R16

**Categories:** Actions complete

Hi Rory

Thanks for your email and apologies for the confusion.

In respect of the below submission point by Bunnings, the relief sought is to retain the restricted discretionary activity status for trade suppliers under rule MUZ-R16 and to delete the qualifying thresholds under MUZ-R16-1 and MUZ-R16-2 for the reasons as given in the primary submission.

Bunnings supports the restricted discretionary activity status for trade suppliers in the Mixed Use zoned but does not support the requirement to comply with the standards under MUZ-R16-1 to achieve this activity status.

Kind regards,

**Mary Wong**  
Associate



B&A  
Urban & Environmental  
M +6421 0310291 T + 649 375 0900

---

**From:** Rory Smeaton <Rory.Smeaton@porirucity.govt.nz>  
**Sent:** Wednesday, 23 December 2020 3:36 PM  
**To:** Matt Norwell <Mattn@barker.co.nz>; Mary Wong <Mary.Wong@barker.co.nz>  
**Cc:** dpreview <dpreview@porirucity.govt.nz>  
**Subject:** Proposed Porirua District Plan - Clarification of relief sought by Bunnings for MUZ-R16

Tēnā kōrua Matt and Mary,

Thank you for the submission from Bunnings on the Proposed Porirua District Plan. I am just entering the Bunnings submission into our database and would like some clarification on the submission on rule MUZ-R16, as reproduced below.

The relief sought states that Bunnings would like MUZ-R16 to be retained as notified, but also for MUZ-R16-1 and MUZ-R16-2 to be deleted (noting that these two clauses form the entire rule). As such, would you please be able to clarify the relief sought by Bunnings in respect of this rule?

Tēnā kōrua Matt and Mary,

Thank you for the submission from Bunnings on the Proposed Porirua District Plan. I am just entering the Bunnings submission into our database and would like some clarification on the submission on rule MUZ-R16, as reproduced below.

The relief sought states that Bunnings would like MUZ-R16 to be retained as notified, but also for MUZ-R16-1 and MUZ-R16-2 to be deleted (noting that these two clauses form the entire rule). As such, would you please be able to clarify the relief sought by Bunnings in respect of this rule?

<p>MUZ-R16 Trade supplier</p>	<p>Bunnings supports the restricted discretionary activity status trade suppliers in the Mixed Use Zone. However, Bunnings considers does not support limited the GFA of trade suppliers to 1,500m<sup>2</sup> in order to secure this permitted activity status.</p> <p>The store format of trade suppliers is such that they carry building products that are typically large in size and therefore larger building footprints are typically required to accommodate and store all the products. Bunnings store formats are usually larger than 1,500m<sup>2</sup> and would therefore require discretionary activity consent as a consequence which is considered to be an unnecessarily onerous activity status for the Mixed Use Zone.</p>	<p>Support in part</p>	<p>Retain rule MUZ-R16 as notified</p> <p>Delete rules MUZ-R16-1 and MUZ-R16.2 as notified</p>
-------------------------------	---	------------------------	--

Thanks in advance.

Ngā mihi,

Rory

**Rory Smeaton** MNZPI  
 Senior Policy Planner  
 Kaihanga Mahere Kaupapahere Matua

Mob: 021 195 2071  
 Phn: 04 237 1504



[porirua.govt.nz](http://porirua.govt.nz)

**Disclaimer**