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## Submission on Napier City Proposed District Plan

### Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To:** Napier City Council - Planning Unit

**Date received:** 14/12/2023

**Submission Reference Number #:**205

This is a submission on the following proposed plan (the **proposal**): Napier City Proposed District Plan

**Submitter:**

Bunnings Limited ("Bunnings")

**Address for service:**

Hus Narsai  
Bunnings Limited  
PO Box 14436 Panmure Auckland 1741  
New Zealand

**Email:** hnarsai@bunnings.co.nz

**Attachments:**

Bunnings - Napier PDP Submission Final 12Dec23.pdf

**I wish to be heard:** Yes

**I am willing to present a joint case:** Yes

Could you gain an advantage in trade competition in making this submission?

- **No**

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- **Yes**

### Submission points

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**Point 205.1**

**Section:** Definitions

**Sub-section:** Definitions

**Provision:** General

**Sentiment:** Amend

**Submission:**

Bunnings opposes the lack of specific recognition for “trade suppliers” throughout the PDP because there is no definition provided for this activity and it is broadly provided for under the “retail activity” only.

Bunnings considers it critical that the definitions section of the PDP is well informed and appropriately provides for the establishment of future activities. Given future expansion opportunities throughout the wider city in the near future, the inclusion of a standardised definition at the district-wide level to provide for a consistent approach is considered to be important. To that extent, Bunnings proposes the activity of “trade suppliers” to be specifically defined under the PDP.

**Relief sought**

Include definition of trade suppliers within the definitions chapter with wording such as:

“Trade suppliers

Means a business engaging in sales to business and institutional customers (but may also include sales to the general public) whose products wholly consist of one or more of the following categories:

- Automotive or marine supplies;
- Building supplies;
- Catering equipment;
- Farming and agricultural supplies;
- Garden and outdoor equipment;
- Industrial supplies;
- Landscape supplies;
- Outdoor recreation equipment;
- Pet supplies; and
- Maintenance and cleaning supplies.”

**Point 205.2**

**Section:** TPT - Transport

**Sub-section:** TPT - Transport - Standards Table

**Provision:**

**TPT-S7: Vehicle trip generation**

1. Activities in residential zones must not exceed the following vehicle movement thresholds:

**Matters of discretion are:**

Type of vehicle	Maximum number of vehicle movements
Light	200 per day
Heavy	10 per day

1. Safety and efficiency of the integrated transport network;
2. Economic

2. Activities in all other zones must not exceed the following vehicle movement thresholds:

wellbeing, and  
3. Public health and community wellbeing.

Type of vehicle	Maximum number of vehicle movements
Light	400 per day
Heavy	50 per day

**Sentiment:** Oppose

**Submission:**

Bunnings opposes the limit of 400 vehicles per day for all activities except residential activities. This threshold is low for trade supplier activities, and it is recommended that this is increased to recognise the operational demands of these activities.

**Relief sought**

Bunnings propose that the standard is amended to increase the ITA and trip generation threshold to 700 vehicles (peak) per hour for trade supplier activities.

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### Point 205.3

**Section:** LIZ - Light Industrial Zone

**Sub-section:** LIZ - Light Industrial Zone - Rules Table

**Provision:** General

**Sentiment:** Oppose

**Submission:**

Bunnings acknowledges the need to control the location, nature and scale of activities that interface with residential zones. However, it is considered that explicit provision should be made for trade suppliers within the zone as restricted discretionary activity.

**Relief sought**

Bunnings seeks for specific provision for trade suppliers in the Light Industry Zone with the following activity statuses:  
Trade suppliers – Restricted Discretionary

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### Point 205.4

**Section:** LIZ - Light Industrial Zone

**Sub-section:** LIZ - Light Industrial Zone - Standards Table

**Provision:**

LIZ-S4: Stormwater run-off

**Purpose:** to manage 1. Sites must not drain stormwater directly into **Matters of discretion are:**

*risk to human health and effects on water quality, ecology, and the council's reticulated network; to ensure development layout, operation and design do not contaminate water; to minimise potential flood risks; and to minimise effects on the capacity of the stormwater network.*

Te Whanga (the Ahuriri estuary) or any waterbody or open drain.

2. Interceptor traps must be used to remove sediment, floating debris, and oil products from all stormwater collected from the site, including general yards and storage areas, prior to its discharge to the Napier City Council reticulated stormwater system.
3. Impervious area must not exceed 80% of the net site area.

**Note:** Stormwater may only be discharged to a council-reticulated network in compliance with the Napier City Council Stormwater Bylaw.

1. Purpose of the standard;
2. The area of impervious surfaces and methods to control of stormwater run-off;
3. The effects on water quality and quantity;
4. Risk to public health and safety and the environment, and
5. Effects on water quality and the effect on the ecology and aquatic life of the Ahuriri estuary.

All onsite stormwater discharges are regulated by the Hawke's Bay Regional Resource Management Plan and may require resource consent approval. Contact the Hawke's Bay Regional Council for advice.

**Sentiment:** Oppose

**Submission:**

Bunnings acknowledges the need to manage infrastructure demands resulting from development within the Light Industry Zone. However, the proposed restrictions on impervious areas limit the potential scale of development. There are other mechanisms to control stormwater run-off such as the provision of detention and retention for example.

**Relief sought**

Remove the proposed restrictions on impervious area to provide for greater flexibility in the site layout that would better suit functional requirements of Bunnings.

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**Point 205.5**

**Section:** GIZ - General Industrial Zone

**Sub-section:** GIZ - General Industrial Zone - Rules

**Provision:** General

**Sentiment:** Amend

**Submission:**

Bunnings supports the provision for trade supply retail activity within the General Industrial zone. However, it is considered that the retail and display floor space GFA limit of 200m<sup>2</sup> should be removed.

**Relief sought**

Bunnings seeks for specific provision for trade suppliers in the General Industrial Zone with the following activity statuses:  
Trade suppliers – Permitted

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## Point 205.6

**Section:** GIZ - General Industrial Zone

**Sub-section:** GIZ - General Industrial Zone - Standards Table

### Provision:

#### GIZ-S6: Stormwater run-off

**Purpose:** *to manage risk to human health and effects on water quality, ecology, and the council's reticulated network; to ensure development layout, operation, and design do not contaminate water; to minimise potential flood risks; and to minimise effects on the capacity of the stormwater network.*

1. All sites must be drained in a manner to ensure that stormwater generated on the site is unable to directly enter the Ahuriri estuary or any waterbody or open drain.
2. Interceptor traps must be used to remove sediment, floating debris and oil products from all stormwater collected from the site including general yards and storage areas, prior to its discharge to the Napier City Council reticulated stormwater system or private discharges to any waterbody or watercourse.
3. All roof surfaces on a building, structure, or storage area are to be constructed from inert materials or painted with non-metal-based paint and maintained in good order.
4. Impervious area must not exceed 80% of the net site.

#### Matters of discretion are:

1. The purpose of the standard, and
2. Effects on water quality and the ecology and aquatic life of the Ahuriri estuary.

#### Notes:

Stormwater may only be discharged to a council-reticulated network in compliance with the Napier City Council Stormwater Bylaw.

All onsite stormwater discharges are regulated by the Hawke's Bay Regional Resource Management Plan and may require resource consent approval. Contact the Hawke's Bay Regional Council for advice.

**Sentiment:** Oppose

#### Submission:

Bunnings acknowledges the need to manage infrastructure demands resulting from development within the General Industrial Zone. However, the proposed restrictions on impervious areas limit the potential scale of development. There are other mechanisms to control stormwater run-off such as the provision of detention and retention for example.

#### Relief sought

Remove the proposed restrictions on impervious area to provide for greater flexibility in the site layout that would better suit functional requirements of Bunnings.

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## Point 205.7

**Section:** LFRZ - Large Format Retail Zone

**Sub-section:** LFRZ - Large Format Retail Zone - Rules Table

**Provision:** General

**Sentiment:** Amend

**Submission:**

Bunnings supports the provision for retail activities within the Large Format Retail zone. However, it is considered that explicit provision should be made for trade suppliers within the zone.

**Relief sought**

Bunnings seeks for specific provision for trade suppliers in the Large Format Retail Zone with the following activity statuses:  
Trade suppliers with a GFA over 1,000m<sup>2</sup> – Permitted

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## Point 205.8

**Section:** LFRZ - Large Format Retail Zone

**Sub-section:** LFRZ - Large Format Retail Zone - Rules Table

**Provision:**

LFRZ-R3: Car parking areas

**LFRZ-R3A**

**LFRZ-R3B**

**Activity Status:** Permitted

**Activity Status where activity conditions are not met:** Discretionary

**Where:**

1. The car parking area is ancillary to a permitted activity,
2. A 2 metre-wide landscaping strip comprised of indigenous plants is provided along the full frontage of each road frontage (except for the vehicle crossing), and
3. One indigenous specimen tree is provided for every ten car parks.

**Sentiment:** Oppose

**Submission:**

LFRZ-R3 requires the provision of one indigenous specimen tree per 10 car parking spaces. This requirement is considered to be unnecessarily onerous given the requirement for a landscaping buffer to be provided.

**Relief sought**

Remove requirement for providing indigenous trees based on car parking spaces. This requirement does not recognise the functional and operational requirements of Bunnings with respect to the provision of car parking.

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## Point 205.9

**Section:** LFRZ - Large Format Retail Zone

**Sub-section:** LFRZ- Large Format Retail Zone - Standards Table

**Provision:**

**LFRZ-S4: Site intensity**

**Purpose:** *to manage traffic generation and infrastructure demand from development.*

1. The gross floor area for all buildings on a site must not exceed 40% of the net site area.

**Matters of discretion are:**

1. Safety and efficiency of the integrated transport network, and
2. Resilience and infrastructure.

**Sentiment:** Oppose

**Submission:**

Bunnings acknowledges the need to manage infrastructure demands resulting from development within the Large Format Retail Zone. However, the proposed restrictions on site coverage limit the potential scale of development and are not considered to align with the objectives and policies of the Large Format Retail Zone, particularly LFRZ – O3 and P2. Further, there are other mechanisms to control stormwater run-off such as the provision of detention and retention for example.

**Relief sought**

Remove the proposed restrictions on impervious area and site intensity to provide for greater flexibility in the site layout that would better suit the functional requirements of Bunnings.

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**Point 205.10**

**Section:** LFRZ - Large Format Retail Zone

**Sub-section:** LFRZ- Large Format Retail Zone - Standards Table

**Provision:**

**LFRZ-S5: Impervious area**

**Purpose:** *to minimise potential flood risks; and to minimise effects on the capacity of the stormwater network and quality of discharges.*

1. Impervious area must not exceed 90% of the net site area.

**Matters of discretion are:**

1. Resilience and infrastructure.

**Sentiment:** Oppose

**Submission:**

Bunnings acknowledges the need to manage infrastructure demands resulting from development within the Large Format Retail Zone. However, the proposed restrictions on site coverage limit the potential scale of development and are not considered to align with the objectives and policies of the Large Format Retail Zone, particularly LFRZ – O3 and P2. Further, there are other mechanisms to control stormwater run-off such as the provision of detention and retention for example.

**Relief sought**

Remove the proposed restrictions on impervious area and site intensity to provide for greater flexibility in the site layout that would better suit the functional requirements of Bunnings.

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**Point 205.11**

**Section:** MUZ - Mixed Use Zone

**Sub-section:** MUZ - Mixed Use Zone - Rules Table

**Provision:** General

**Sentiment:** Amend

**Submission:**

Bunnings supports the provision for retail activities within the Mixed Use zone. However, it is considered that explicit provision should be made for trade suppliers within the zone.

**Relief sought**

Bunnings seeks for specific provision for trade suppliers in the Large Format Retail Zone with the following activity statuses:

Trade suppliers – Restricted Discretionary

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**Point 205.12**

**Section:** MUZ - Mixed Use Zone

**Sub-section:** MUZ - Mixed Use Zone - Standards Table

**Provision:**

MUZ-S5: Building coverage

*Purpose: to maintain the character and minimise effects on the quality of the neighbours' living environment.*

1. Building coverage must not exceed 70% of the net site area.

**Matters of discretion are:**

1. Quality living environments;
2. Amenity values, and
3. Character of the area.

**Sentiment:** Oppose

**Submission:**

Bunnings acknowledges the need to manage infrastructure demands resulting from development within the Mixed Use Zone. However, the proposed restrictions on building coverage, impervious area and landscaped area limit the potential scale of development. There are other mechanisms to control stormwater run-off such as the provision of detention and retention for example.

**Relief sought**

Remove the proposed restrictions on building coverage, impervious area and landscaped area to provide for greater flexibility in the site layout that would better suit functional requirements of Bunnings.

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**Point 205.13**

**Section:** MUZ - Mixed Use Zone



**Sub-section:** MUZ - Mixed Use Zone - Standards Table

**Provision:**

**MUZ-S6: Impervious area**

**Purpose:** to minimise potential flood risks and to minimise effects on the capacity of the stormwater network and quality of discharges.

1. Impervious area must not exceed 80% of the net site area.

**Matters of discretion are:**

1. Purpose of the standard, and
2. Resilience and infrastructure.

**Sentiment:** Oppose

**Submission:**

Bunnings acknowledges the need to manage infrastructure demands resulting from development within the Mixed Use Zone. However, the proposed restrictions on building coverage, impervious area and landscaped area limit the potential scale of development. There are other mechanisms to control stormwater run-off such as the provision of detention and retention for example.

**Relief sought**

Remove the proposed restrictions on building coverage, impervious area and landscaped area to provide for greater flexibility in the site layout that would better suit functional requirements of Bunnings.

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**Point 205.14**

**Section:** MUZ - Mixed Use Zone

**Sub-section:** MUZ - Mixed Use Zone - Standards Table

**Provision:**

**MUZ-S7: Landscaped area**

**Purpose:** to maintain the character of the area and to maintain the quality of the living environment.

1. Landscaped area must be a minimum of 20% of the net site area.

**Matters of discretion are:**

1. Purpose of the standard;
2. Quality living environments;
3. Amenity values, and
4. Character of the area.

**Sentiment:** Oppose

**Submission:**

Bunnings acknowledges the need to manage infrastructure demands resulting from development within the Mixed Use Zone. However, the proposed restrictions on building coverage, impervious area and landscaped area limit the potential scale of development. There are other mechanisms to control stormwater run-off such as the provision of detention and retention for example.

**Relief sought**

Remove the proposed restrictions on building coverage, impervious area and landscaped area to provide for greater flexibility in the site layout that would better suit functional requirements of Bunnings.





12 December 2023

Napier City Council  
Attn: District Plan Review Team  
**Via email:** [districtplanreview@napier.govt.nz](mailto:districtplanreview@napier.govt.nz)

## Submission on Napier City Proposed District Plan

**Name of Submitter:** Bunnings Limited ("Bunnings")

1. Bunnings makes this submission on the Napier 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. Employing more than 5,600 New Zealanders, Bunnings operates 41 warehouses and smaller format stores and 9 trade centres throughout New Zealand, along with a commercial selection studio, a distribution centre and a support 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 any future operation and development of Bunnings' in Napier City.
8. There is currently no Bunnings Warehouse store in Napier City but Bunnings are actively looking for a site to develop for a future Bunnings Warehouse store. Bunnings is therefore directly affected by the PDP and has an interest on the outcome.

## Submission

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

## Address for Service

Bunnings Limited  
Attn: Hus Narsai  
PO Box 14436, Panmure, Auckland 1741  
[REDACTED]  
Email: [hnarsai@bunnings.co.nz](mailto:hnarsai@bunnings.co.nz)

Yours faithfully

Hus Narsai  
**Property Development Manager**



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

PDP Reference	Submission / Reasons	Support / Oppose	Relief Sought
<b>Part 1 – Introductions and General Provisions – Definitions</b>			
'Trade suppliers' definition	<p>Bunnings opposes the lack of specific recognition for “trade suppliers” throughout the PDP because there is no definition provided for this activity and it is broadly provided for under the “retail activity” only.</p> <p>Bunnings considers it critical that the definitions section of the PDP is well informed and appropriately provides for the establishment of future activities. Given future expansion opportunities throughout the wider city in the near future, the inclusion of a standardised definition at the district-wide level to provide for a consistent approach is considered to be important. To that extent, Bunnings proposes the activity of “trade suppliers” to be specifically defined under the PDP.</p>	Support in Part	<p>Include definition of trade suppliers within the definitions chapter with wording such as:</p> <p>“Trade suppliers</p> <p>Means a business engaging in sales to business and institutional customers (but may also include sales to the general public) whose products wholly consist of one or more of the following categories:</p> <ul style="list-style-type: none"> <li>• Automotive or marine supplies;</li> <li>• Building supplies;</li> <li>• Catering equipment;</li> <li>• Farming and agricultural supplies;</li> <li>• Garden and outdoor equipment;</li> <li>• Industrial supplies;</li> <li>• Landscape supplies;</li> <li>• Outdoor recreation equipment;</li> <li>• Pet supplies; and</li> <li>• Maintenance and cleaning supplies.”</li> </ul>
<b>Part 2 – District Wide Matters - Transport</b>			
Rules: Land Use activities	Bunnings opposes the limit of 400 vehicles per day for all activities	Oppose	Bunnings propose that the standard is amended to increase the ITA and

Vehicle Trip Generation – TPT – S7	except residential activities. This threshold is low for trade supplier activities, and it is recommended that this is increased to recognise the operational demands of these activities.		trip generation threshold to 700 vehicles (peak) per hour for trade supplier activities.
<b>Part 3 – Area Specific Matters</b>			
Light Industry Zone Activities	Bunnings acknowledges the need to control the location, nature and scale of activities that interface with residential zones. However, it is considered that explicit provision should be made for trade suppliers within the zone as restricted discretionary activity.	Oppose	Bunnings seeks for specific provision for trade suppliers in the Light Industry Zone with the following activity statuses: Trade suppliers – Restricted Discretionary
Light Industry Zone Standards LIZ – S4	Bunnings acknowledges the need to manage infrastructure demands resulting from development within the Light Industry Zone. However, the proposed restrictions on impervious areas limit the potential scale of development. There are other mechanisms to control stormwater run-off such as the provision of detention and retention for example.	Oppose	Remove the proposed restrictions on impervious area to provide for greater flexibility in the site layout that would better suit functional requirements of Bunnings.
General Industrial Zone Activities	Bunnings supports the provision for trade supply retail activity within the General Industrial zone. However, it is considered that the retail and display floor space GFA limit of 200m <sup>2</sup> should be removed.	Support in Part	Bunnings seeks for specific provision for trade suppliers in the General Industrial Zone with the following activity statuses: Trade suppliers – Permitted
General Industrial Zone Standards GIZ – S6	Bunnings acknowledges the need to manage infrastructure demands resulting from development within the General Industrial Zone. However, the proposed restrictions on impervious areas limit the	Oppose	Remove the proposed restrictions on impervious area to provide for greater flexibility in the site layout that would better suit functional requirements of Bunnings.

	potential scale of development. There are other mechanisms to control stormwater run-off such as the provision of detention and retention for example.		
Large Format Zone Activities	Bunnings supports the provision for retail activities within the Large Format Retail zone. However, it is considered that explicit provision should be made for trade suppliers within the zone.	Support in Part	Bunnings seeks for specific provision for trade suppliers in the Large Format Retail Zone with the following activity statuses: Trade suppliers with a GFA over 1,000m <sup>2</sup> – Permitted
Large Format Retail Zone Activities LFRZ – S3	LFRZ-R3 requires the provision of one indigenous specimen tree per 10 car parking spaces. This requirement is considered to be unnecessarily onerous given the requirement for a landscaping buffer to be provided.	Oppose	Remove requirement for providing indigenous trees based on car parking spaces. This requirement does not recognise the functional and operational requirements of Bunnings with respect to the provision of car parking.
Large Format Zone Standards LFRZ – S4 and S5	Bunnings acknowledges the need to manage infrastructure demands resulting from development within the Large Format Retail Zone. However, the proposed restrictions on site coverage limit the potential scale of development and are not considered to align with the objectives and policies of the Large Format Retail Zone, particularly LFRZ – O3 and P2. Further, there are other mechanisms to control stormwater run-off such as the provision of detention and retention for example.	Oppose	Remove the proposed restrictions on impervious area and site intensity to provide for greater flexibility in the site layout that would better suit the functional requirements of Bunnings.
Mixed Use Zone Activities	Bunnings supports the provision for retail activities within the Mixed Use zone. However, it is considered that explicit provision should be made for trade suppliers within the zone.	Support in Part	Bunnings seeks for specific provision for trade suppliers in the Large Format Retail Zone with the following activity statuses:

			Trade suppliers – Restricted Discretionary
Mixed Use Zone Standards S5, S6 and S7	Bunnings acknowledges the need to manage infrastructure demands resulting from development within the Mixed Use Zone. However, the proposed restrictions on building coverage, impervious area and landscaped area limit the potential scale of development. There are other mechanisms to control stormwater run-off such as the provision of detention and retention for example.	Oppose	Remove the proposed restrictions on building coverage, impervious area and landscaped area to provide for greater flexibility in the site layout that would better suit functional requirements of Bunnings.