

# Submission on the Hutt City Proposed District Plan



To: Hutt City Council (“Council”)  
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Submitter: Bunnings Limited (“Bunnings”)

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Date: 30 April 2025

## INTRODUCTION

1. This is a submission on the Hutt City Proposed District Plan (“PDP”) in accordance with clause 6(1) of the first schedule of the Resource Management Act (“RMA”) 1991.
2. This submission relates to specific provisions as listed in the attached document and those related provisions of the PDP. The reasons are provided in the attached document.
3. The submitter, Bunnings, could not gain an advantage in trade competition through this submission.
4. Bunnings wishes to be heard in support of this submission.
5. Bunnings would consider presenting a joint case with any other party seeking similar relief.

## BUNNINGS LANDHOLDINGS AND OPERATIONAL CONTEXT

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 31 warehouses, 10 smaller format stores and 9 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

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future District Plan provisions will be important to any future operation and development of Bunnings' in Hutt City.

8. Within Lower Hutt, Bunnings currently operate two stores at the following locations:

- Bunnings Warehouse Naenae – 235 Cambridge Terrace
- Bunnings Warehouse Petone – 48 Hutt Road

## SUBMISSION

9. Bunnings makes a number of PDP submission points as set in Attachment 1.

10. Bunnings current store locations in the Hutt City area are given in Attachment 2 with related submission points.

11. Bunnings seeks all such consequential relief required to give effect to the relief sought in Attachments 1 and 2.

12. For the Proposed Plan provisions not addressed in this submission, Bunnings either agrees with, or is indifferent to, the Proposed Plan provisions as written in their present form. Should the drafting subsequently change, Bunnings reserves its ability to file a further submission or provide further comment on those changes.

## Barker & Associates Limited



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

Note ~~strike through~~ text represents text proposed to be deleted and ***bold italic*** text represents text proposed to be inserted.

PDP Reference	Submission / Reasons	Support / Oppose	Relief Sought
<b>Part 1: Introduction and General Provisions</b>			
Definitions	<p>The PDP contains a specific definition for Trade Supply Retail:</p> <p><i>Means a business primarily engaged in sales or hire to businesses, although it may include sales to the general public that supplies: Automotive or marine parts and supplies, building materials, catering equipment, farming and agricultural supplies, garden and landscaping supplies, industrial and construction machinery, industrial clothing and safety equipment, or office furniture, equipment, and systems.</i></p> <p>Bunnings supports this term and definition and considers that it appropriately captures Bunnings activities. The inclusion of a standardised definition at the district-wide level to provide for a consistent approach is considered to be important.</p>	Support	Retain definition as notified.
<b>Part 2: District-Wide Matters – Energy, Infrastructure and Transport – Transport Rules</b>			
TR-R3  <b>Metropolitan Centre Zone</b>	<p>Rule TR-R3.1.a refers to the ‘High trip generating activity thresholds’ stated in Table 8. For trade supply retail in the Metropolitan Centre Zone, any extent of activity is considered a high trip generating activity threshold.</p> <p>Under Rule TR-R3.1.b, where the activities are located in the Metropolitan Centre Zone, activities are permitted only if no more than 10 on-site motor vehicle parking spaces are provided for the activity.</p> <p>Trade supply retail activities such as Bunnings generally seek to provide on-site customer car parking for more than 10 vehicles, while also encouraging other sustainable transport modes. Rule TR-R3.1 will mean that trip generation and carparking for trade supply retail in the Metropolitan Centre zones need resource consent as a Restricted Discretionary activity and require an Integrated Transport Assessment.</p> <p>Bunnings does not oppose this in its entirety but seeks to ensure that the matters of discretion are appropriate, include recognition of operational and functional needs thereby recognising that trade supply retail should be supported for the positive contribution they make to the viability and function of these centres.</p> <p>Bunnings oppose reference to a financial contribution within the matters of discretion for the reasons detailed in Part 2 below.</p>	Oppose In part	<p>Bunnings seeks to have the matters of discretion under TR-R3.2 amended as follows:</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. The extent that the development provides for active and public transport modes.</li> <li>2. Positive effects on facilitating the uptake of active and public transport modes where in relation to any matter specified in TR-P7: Positive effects.</li> <li>3. <b><i>The operational and functional needs of the activity to exceed the high trip generation threshold.</i></b></li> <li>4. Effects on the capacity, safety, efficiency, and multi-modal function of the transport network.</li> <li>5. Whether safe and effective access can be provided and maintained for emergency service vehicles to the site and within the transport network.</li> <li>6. The design of transport facilities and their integration with the transport network.</li> <li>7. <del>Whether any improvements to the transport network are proposed or required as a</del> <b><i>direct</i></b> result of the <b><i>proposed</i></b> activity, <del>and a financial contribution has been made in accordance with the provisions of the Financial Contributions chapter.</del></li> <li>8. The transport needs of activities on the site.</li> <li>9. Any cumulative adverse effects.</li> </ol>

General Industrial Zone	For the General Industrial Zone the high trip generating activity threshold for trade supply retail is 1000m <sup>2</sup> GFA. This threshold is low for most trade retail activities, and it is recommended that this is increased to recognise the operational demands of these activities.	Oppose in part	Bunnings seeks to have no high trip generating activity threshold for trade supply retail in this zone.
<b>Part 2: District-Wide Matters – General District Wide Matters - Earthworks</b>			
Standards EW-S1.2 Metropolitan Centre Zone Industrial Zones	Bunnings opposes the proposed maximum of 500m <sup>2</sup> of earthworks for Commercial and Industrial zones. This limit does not reflect the generally larger scale of sites and required earthworks to enable commercial and industrial activities.	Oppose in part	Bunnings seeks to enable a larger volume of earthworks as a permitted activity within commercial and industrial zones, up to 3,000m <sup>2</sup> per site, per 12-month period.  Bunnings seeks that EW-S1.2 is amended as follows:  1. The area of earthworks must not exceed <del>500m<sup>2</sup></del> <b>3000m<sup>2</sup></b> per site in any 12-month period.
<b>Part 2: District-Wide Matters – General District Wide Matters – Financial Contributions</b>			
Financial Contributions FC	Bunnings consider that the Financial Contributions chapter does not provide sufficient guidance as to how/when Financial Contributions would be required by Council. This leaves the discretion to Council and has the potential to disincentivise development.	Oppose	Reconsider Financial Contributions chapter to reduce discretion and provide clearer guidance for council and developers.
<b>Part 3: Area Specific Matters – Commercial and Mixed Use Zones - Policies</b>			
Potentially Incompatible Activities Metropolitan Centre Zone – MCZ-P3	Bunnings is opposed to all ground level car parking (on sites subject to Active Street Frontage Overlay) being considered as a potentially incompatible activity in the Metropolitan Centre Zone. The policy seeks to protect adverse effects on amenity and vitality therefore if the car parking is not visible then this policy should not apply.  Trade supply retail activities generally seek to provide on-site customer car parking. This policy will act as a deterrent to development in these commercial zones.	Oppose in part	Bunnings seeks that MCZ-P3 is amended as follows:  <del>Carparking at ground level</del> <b>visible at the street edge or public space</b> on sites subject to the Active Street Frontage Overlay;
<b>Part 3: Area-Specific Matters - Commercial and Mixed Use Zones - Rules</b>			

<p>Carparking activities</p> <p>Metropolitan Centre Zone – MCZ-R18</p>	<p>Bunnings opposes the rules pertaining to carparking activities which does not make it clear whether the reconfiguration of an existing carpark requires resource consent.</p> <p>Reconfiguration of an existing carpark within the same area of the site, including where that reconfiguration results in a change to the type and/or number of parking or loading spaces provided should not need consent.</p> <p>Further, accessible parking should be provided for as a permitted activity.</p>	<p>Oppose in part</p>	<p>Bunnings seeks that MCZ-R18 is amended as follows:</p> <ol style="list-style-type: none"> <li>1. Activity status: Permitted</li> </ol> <p>Where:</p> <ol style="list-style-type: none"> <li>a. Compliance is achieved with: <ol style="list-style-type: none"> <li>i. CCZ-S6: Active frontages – Existing vehicle crossings,</li> <li>ii. CCZ-S8: Location and design of carparking,</li> </ol> </li> <li>b. The carparking is not accessed with a vehicle crossing over an Active Street Frontage Overlay B, and</li> <li>c. The carparking is not accessed with a vehicle crossing over an Active Street Frontage Overlay A; or</li> <li>d. <i>Reconfiguration of an existing carpark area; or</i></li> <li>e. <i>The parking spaces are for accessible parking or electric vehicle charging.</i></li> </ol>
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### Part 3: Area-Specific Matters - Standards

<p>Active Frontages – Building and structures</p> <p>Metropolitan Centre Zone - MCZ-S4</p> <p>Metropolitan Centre Zone - MCZ-S5</p>	<p>Bunnings recognises the intent of the active street frontage controls but considers that they do not appropriately recognise existing development.</p> <p>It is considered that these controls should apply to new buildings and new development only and the requirements should be adjusted such that they do not apply in the case of small change/addition to a building/site but rather only in a substantial redevelopment of a site.</p> <p>In Bunnings experience, centres and commercial areas have a mixture of street typologies. Most have at least one main shopping street and while it is appropriate that these streets have high levels of activation, there are secondary frontages or streets are less important retail streets and have lower levels of pedestrian activity.</p>	<p>Oppose in part</p>	<p>Bunnings seeks that MCZ-S4 is amended as follows:</p> <p>On any site subject to an Active Street Frontage Overlay, <i>any new buildings shall provide the following:</i></p> <ol style="list-style-type: none"> <li>1. There must be a building or abutting group of buildings built to the front boundary, to the full width of the Active Street Frontage Overlay, and to a minimum height of four metres above ground level. Alternatively, the buildings or parts of buildings may be set back from the front boundary by up to 2m where: <ol style="list-style-type: none"> <li>a. The intervening space is paved pedestrian space continuous with the footpath and open to the public, or</li> <li>b. The intervening space is a seating or dining area, or</li> <li>c. The intervening space is an entrance porch, or</li> <li>d. The intervening space is visitor cycle or micromobility parking, or</li> <li>e. The intervening space is used for entrance stairs or pedestrian ramps.</li> </ol> </li> <li>2. The requirement in LCZ-S4.1 does not apply at all on sections of the front boundary: <ol style="list-style-type: none"> <li>a. Where compliance would encroach within the dripline of a notable tree, or</li> <li>b. Where necessary to comply with LCZ-S3: Setbacks – Adjoining zones, or</li> <li>c. On the Active Street Frontage Overlay C, to the degree necessary to provide for a vehicle crossing, manoeuvring area, and visibility splays (but not parking spaces or loading spaces): <ol style="list-style-type: none"> <li>i. Where no other frontage not in an Active Street Frontage Overlay is available,</li> <li>ii. With a traffic lane width of no more than 6m,</li> </ol> </li> </ol> </li> </ol>
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<p>Location and design of carparking</p> <p>Metropolitan Centre Zone – MCZ-S8</p>	<p>Bunnings opposes the standards pertaining to carparking activities and the location of parking which requires the provision of on-site car parking to be located within, underneath, on top of, 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, such as trade supply retail, which have integral back-of-house and loading requirements as part of their store formats that are usually located at the rear of buildings with the main entrance then located at the front of the building. This restricts the opportunity to provide parking at the rear of the building to comply with these standards while creating functional site layouts.</p> <p>Bunnings considers that if the car parking is not visible then this should be a permitted activity.</p>	<p>Oppose in part</p>	<p>Bunnings seeks that MCZ-S8 is amended as follows:</p> <p>On any site subject to an Active Street Frontage Overlay A or B:</p> <ol style="list-style-type: none"> <li>Carparking must only be located: <ol style="list-style-type: none"> <li>within or underneath a building, or</li> <li>on top of a building at least 3m above ground level, or</li> <li>shielded from the Active Street Frontage Overlay A or B by a building, <i>or</i></li> <li><i>otherwise not visible at the street edge or public space.</i></li> </ol> </li> <li>Carparking may not be served by a <b>new</b> vehicle crossing across an Active Street Frontage Overlay A or B.</li> </ol> <p>On any site subject to an Active Street Frontage Overlay C:</p> <ol style="list-style-type: none"> <li>Carparking must only be located within or underneath a building, on top of a building at least 3 metres above ground level, beside a building accounting for no more than 50% of the width of the site, or behind a building, <i>or otherwise not visible at the street edge or public space.</i></li> </ol> <p>On any site:</p> <ol style="list-style-type: none"> <li>Parking areas must be screened from any adjoining site in a Residential Zone or Marae Zone with a building or a close-boarded fence of at least 1.8m in height,</li> <li>Parking areas must be designed so they can only be accessed from a formed vehicle crossing,</li> <li>Parking areas must be sealed to prevent dust (this may be permeable),</li> <li>Parking areas at ground level other than manoeuvring space must be separated from any boundary by landscaped buffer of at least 0.5m (with a kerb or wheel stop) or 1.5m (otherwise), and</li> <li>There must be at least 1m<sup>2</sup> of landscaping for every 20m<sup>2</sup> of outdoor carparking or vehicle manoeuvring area at ground level. The landscaping referred to in MCZ-S8.7 may be included.</li> </ol>
<p><b>Part 3: Area-Specific Matters – Industrial Zones - Rules</b></p>			
<p>Trade supply retail activities</p> <p>General Industrial Zone – GIZ-R15</p>	<p>Under GIZ-R15.1 a trade supply retail activity where the indoor part of the activity has a gross floor area of more than 200m<sup>2</sup> is a restricted discretionary activity.</p> <p>Bunnings supports the provision for trade supply retail activity within the General Industrial Zone. However, it is considered that the controls (a – c) should be removed as a Permitted activity consent status is appropriate in the Industrial zone.</p>	<p>Oppose in part</p>	<p>Bunnings seeks that GIZ-R15 is amended as follows:</p> <p><del>1.</del> <b>Activity status:</b> Permitted</p> <p><del>Where:</del></p> <ol style="list-style-type: none"> <li><del>The activity is ancillary to an industrial activity, or</del></li> <li><del>The indoor part of the activity has a gross floor area of no more than 200m<sup>2</sup>, or</del></li> <li><del>The indoor part of the activity takes place in an existing building.</del></li> </ol>

		We note, under the ODP, the Building Improvement Centre on this specific site is provided for as a permitted activity under 6A 2.1.1 k. iv. This has not been carried through to the PDP.		
jasPart 3: Area-Specific Matters – Industrial Zones - Standards				
General Industrial Zone	Construction of new buildings and structures and alterations and additions to existing buildings and structures – GIZ-R3	<p>Under Rule GIZ-R3, the construction of new buildings and structures and alterations and additions to existing buildings and structures is a permitted activity where:</p> <ol style="list-style-type: none"> <li>compliance is achieved with: Standards GIZ-S1 to GIZ-S5.</li> <li>The new buildings, the new structures, the alterations, or the additions, are for the purpose of an activity permitted by one or more of rules GIZ-R4 through GIZ-R17, or a heavy industrial activity.</li> </ol> <p>Standard GIZ-S5 relates to landscaping and screening adjacent to the Industrial Main Through Route Frontage Overlay. It is considered that these controls should apply to new buildings and new development only and the requirements should be adjusted such that they do not apply in the case of small change/addition to a building/site but rather only in a substantial redevelopment of a site.</p>	Oppose in part	<p>Bunnings seeks that GIZ-S5 is amended as follows:</p> <ol style="list-style-type: none"> <li><b>On any site subject to an Industrial Main Through Route Frontage Overlay, any new buildings shall provide the following:</b> Landscaping is required on the front 3 metres of any site fronting on to a street with the Industrial Main Through Route Frontage Overlay.</li> <li>Landscaping is required on a 3 metre buffer on any boundary with an adjoining site in the Residential Zone, Rural Zone, Mixed Use Zone, Marae Zone, or Open Space and Recreation Zone, unless the site is screened with a solid or close-boarded fully opaque fence on the boundary of at least 1.8m in height above ground level.</li> <li>Landscaping required by this standard must: <ol style="list-style-type: none"> <li>Extend across the full width, except for vehicle accesses connecting to a legal vehicle crossing, and pedestrian walkways,</li> <li>Include at least one tree per 15 metres of frontage or boundary (as relevant), and</li> <li>Those trees must have a minimum stem diameter of 40mm at the time of planting and be capable of reaching a height of at least 5 metres at maturity.</li> </ol> </li> </ol> <p><b>Matters of discretion if the standard is breached:</b></p> <ol style="list-style-type: none"> <li>Visual amenity from the road subject to the Industrial Main Through Route Frontage Overlay or the adjoining site, as relevant.</li> <li>Urban design outcomes 1, 2, and 6 in GIZ-P9: Urban design outcomes (by meeting standard or assessment), and the exclusions in GIZ-P11.</li> <li>Any positive effects that can only be achieved through non-compliance with the standard.</li> </ol>



Attachment 2: Bunnings current store locations in the Hutt City area and related submission points:

Site	PDP Zone	Support / Oppose	Relief Sought
Bunnings Warehouse Naenae 233 Cambridge Terrace	General Industrial Zone	<ul style="list-style-type: none"><li>• Support zoning</li><li>• Oppose trade supply retail as restricted discretionary activity</li></ul>	<ul style="list-style-type: none"><li>• Retain zoning as notified.</li><li>• Provide for trade supply retail as a permitted activity in the General Industrial Zone.</li></ul>
Bunnings Warehouse Petone 48 Hutt Road	Metropolitan Centre Zone	<ul style="list-style-type: none"><li>• Support zoning</li><li>• Support trade supply retail as a restricted discretionary activity</li></ul>	<ul style="list-style-type: none"><li>• Retain zoning as notified.</li></ul>