Draft National Policy Statement on Urban Development – Submission on behalf of Bunnings Limited

1. Introduction

Bunnings Limited (Bunnings) welcomes the opportunity to make a submission on the proposed National Policy Statement for Urban Development Discussion Document (NPS-UD) submitted for public consultation in August 2019.

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 building improvement stores or “do it yourself” centres that sell building related products to tradespeople such as builders, landscaping contractors and plumbers, as well as to the general public. Bunnings also typically include nurseries and timber trade outlets. For these reasons, Bunnings generally requires a large building footprint ranging from 5,000m2 to 10,000m2 in gross floor area.

Bunnings submits on one aspect of the proposed NPS-UD that affects its activities.

2. Removing minimum car parking requirements

2.1 Oppose

Bunnings opposes all proposed options that limit the ability for local authorities in major urban centres to regulate the number of car parks required for a development, or any proposal to introduce car parking maximums.

Bunnings also note that it is unclear from the wording of the car parking policy direction proposal outlined within Option 1 in Section 5 Removing minimum car parking requirements1 of the NPS-UD discussion document, whether MFE are looking to introduce car parking maximums.

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1 NPS-UD discussion document page 40
requirements in major urban centres. Bunnings oppose any introduction of carparking maximums and are concerned this will exacerbate the effects associated with the deletion of car park minimums discussed below.

2.2 Reasons

In Bunnings experience the majority of trips to retail are currently, and will continue to be, made by private vehicles. The typical shopping trip is not necessarily compatible with public transport timetables and often involves multiple destinations. Furthermore, shopping trips to a Bunnings store will typically involve the purchase of multiple items and bulky goods which are more conveniently transported by car. As a result, an adequate supply of car parking is essential for retail activities. Trips made to retail land use activities generally occur outside of peak times and therefore do not contribute to peak hour congestion.

Bunnings are concerned that the deletion of car parking minimums is being pursued on the basis that carparking minimums lead to an overly supply of carparking. Bunnings disagree that car parking minimums lead to an oversupply because the cost of providing parking is a natural restraint on the supply of parking associated with developments.

In Bunnings view the removal of carparking minimums will have three key impacts which are discussed below.

*Overspill into Residential Areas*

In Bunnings's view if options to delete minimum carparking requirements are pursued this will result in carparking overspill effects on surrounding streets. If there is no requirement for carparking on-site for individual developments in retail centres and in other areas identified for intensification, pressure will come on the surrounding neighbourhood from staff, customers and other visitors utilising carparking spaces on the streets in what are predominantly residential areas. Where retail developments do provide carparking for their customers in areas experiencing a lack of on street carparking these car parking areas will be used illegitimately at the retailers expense.

*Illegitimate use of Parking Areas*

Minimum car parking requirements are set at a rate that reflects the anticipated demand generated by the activity. This provides a degree of fairness with all activities treated equitably. Bunnings are concerned that the deletion of car parking minimums will lead to car parking only being provided by larger retail formats, which must provide sufficient parking spaces for their customers in order to ensure the viability of a store. Within Auckland’s traditional shopping centres, the larger format retailers often provide a pool of parking that is utilised by visitors to the centre in general. This can be acceptable when there is other parking available, such as in Council owned or privately operated parking areas or buildings that are shared, in turn, by all of the
centre’s visitors. However, when new development occurs with no recognition of the parking demand it generates, private parking areas will increasingly be utilised by visitors to other activities or facilities.

**Negative impact on the Viability of Centres and Activities**

The under supply of car parking in retail centres will affect the viability of the centre as customers patronise other centres, or other locations, where a greater supply of car parking is available. This will result in these centres becoming less capable of meeting Council’s expectations for intensification.

**2.3 Decision Sought**

Bunnings seeks the following amendments to the proposed NPS-UD:

a) Withdrawal of proposed policies in relation to carparking requirements; and
b) Withdrawal of any future more directive intervention to regulate carparking through a National Environmental Standard.

**3. Conclusion**

Bunnings thank the Ministry for the Environment for the opportunity to submit on the proposed NPS-UD. Bunnings generally support the proposed NPS-UD subject to addressing the concerns outlined in this submission and amending the policy statement accordingly.

Yours Faithfully

Barker & Associates Ltd

(Person authorised to sign on behalf of submitter)
4. **Address for Service**

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