

**Letter from Doug Lloyd [doug.lloyd3@gmail.com](mailto:doug.lloyd3@gmail.com)  
sent Wed, Nov 4, 2020 at 10:09 AM by email**

Hello Everyone

The KDC has now released their response to the Mangawhai Central Plan change. It is basically accept, accept, accept, with a few modifications.

The Spatial Plan and the Long Term plan which focus on retaining Mangawhai's coastal township character have basically been ignored as the KDC's response to MC says that Mangawhai has to change. Also just simple things like "water tanks are not necessary on 350sq m sections as there is no room" with no mention of where and how the water is to be supplied.

Below this email please find a summary of the KDC's response with our comments (highlighted)

Also a copy of the existing resource consent is attached along with the proposed plan. The difference is scary.

So if the plan change is to be contested we are on our own. We have raised \$21,000 in funds and require another \$30,000 to be represented by the expert witnesses required to fight the plan change.

That is \$1000 from 20 people and \$500 from 20 people. However we understand many people are not in this league so we will appreciate anything you can donate. If we fail to meet the target and not attend the hearing we will refund the donations.

Without your help we will not be able to attend the hearing and the plan change will go ahead unchallenged.

Some people will receive this email twice and some who have already donated will also receive it. If this affects you please accept my apologies as things are happening very fast for us and we have not as yet updated and rationalized our database.

Bank A/c details ANZ Ponsonby 01 0204 0160241 00

Also please email us so that we can record your donation.

Thank You and Kind regards  
Doug Lloyd  
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Kaipara District Council's preliminary response to Viranda's application for Plan Change 78 is contained in a Planner's Report (prepared planning consultancy Barker & Associates of Whangarei). This is required by the Resource Management Act and was published on Friday 30<sup>th</sup> October. Its analysis of the original application and recommendations will now go before a planning hearing later this month, after which independent Planning Commissioners will make their recommendations to

the Council on whether to allow the plan Change, and what adjustments and conditions they might require.

The Planner's Report reviews the application documents, which are also subject to peer review, and considers the hundreds of submissions from the public on the Plan Change.

The report's recommendations are not good news for Mangawhai Matters members or for the many people who voiced opposition to many aspects of the proposed Plan Change. The majority of concerns have been rejected, although recommendations have been made for plugging gaps in the application regarding groundwater and ecological matters and how development in the Coastal Marine Area will be managed.

Below is a brief summary of the Planner's Report in the areas we believe are important to the community.

### 1. Amenity and Character.

The Report rejects a call for doing away with a large number of small lots of a minimum 350sq metres proposed by the Plan Change. It says "*changes are inevitable with urban development in a predominantly rural area at the start of a process of urbanization.*"

This is a major presumption. The resident population in the Heads and Village is currently around 3,600, with another 2,600 people classified as rural. From this level, the Report accepts the Plan Change as a starting step in the transformation of Mangawhai from two closely-linked village communities on the coast to an urban area of 10,000 or more people at which level it might justify higher density development.

### 2. Community Facilities

The Report rejects calls for more community facilities in the planned subdivision, saying "consideration of the establishment of community facilities will be more efficiently made at the time of subdivision and development, subject to the negotiation between the applicant and the Council".

Our view is that a commitment should be made to the needs of the community that is expected to emerge at Mangawhai Central through the objectives and policies of the Plan Change and its land use provisions, especially if it does attain the substantial increase in population planned.

### 3. Consultation

The Report rejects claims that the community had not been adequately consulted. It says: "Consultation on PC78 undertaken by Mangawhai Central prior to lodgement was in excess of that required under the RMA (Resource Management Act)".

Our view remains that the process failed to achieve the level of consultation that is required by a Plan Change that, if accepted by the Council, will have far-reaching

consequences for the entire community and wider environment, and not simply the Mangawhai Central site.

#### 4. Wastewater.

The Report accepts that there is sufficient capacity within the MCWS and that it can be upgraded to cater for additional demand in the future (should the need arise).

#### 5. Wastewater Disposal

The report recommends that this should be addressed “most effectively” at the time of subdivision. It states that the Council’s “development contribution policy” is not within the scope of the Plan Change and rejects calls for greater transparency.

Again, given the magnitude of change proposed, it is our view that long term arrangements for wastewater treatment and disposal should be detailed and the impact on the long Term Plan and funding arrangements made clear by the Council, even if that is outside the plan Change process.

#### 6. Potable Water

In rejecting calls for water tanks on all sections within the subdivision, the Report says that “to support a mandatory roof water collection may not be suitable or possible (to collect) from every roof.” This is hardly surprising if there is an expectation that the majority of sites sold will be less than 500sqm and as small as 350sqm.

As it is, the peer review of provisions for potable water acknowledges the uncertain nature of the aquifer and the likely limitations on its capacity to supply the level of development that PC78 would enable.

This appears to be a major shortcoming of the application and of the suggestion in the Report that it is something that can be resolved at the time of subdivision. Unless there is certainty over the capacity to sustainably supply water to the development or to allow only residential development capable of collecting rainwater, it is hard to see the development as proposed being realised.

One problem this raises is that we don’t know what compromise – or compromised – development might eventuate. There is consequently too much uncertainty over the development as a whole. This something we expect the Commissioners will have to consider closely.

#### 7. Residential lots and numbers

The Report accepts the applicant’s position that the 500-unit cap as approved for Estuary Estates on the site “unduly limits residential yields despite the land clearly having a much greater capacity for development.” It concludes that “reducing lot sizes to 350sq metres is a better outcome than enabling lower density sprawl elsewhere in the wider (Mangawhai) area.” This raises several questions.

Mangawhai comprises a relatively small settles which, as such, does not sprawl. It enjoys the amenity and diversity of a mixture of section sizes, reflecting both its history and its topography. It does not have the high density of a fully urban area of new commuter suburbs like Millwater and Hobsonville. There is no obvious reason why it should. As noted above, a large population increment may not be sustainable without a totally new source of potable water or a significant reduction in density.

#### 8. Infrastructure General

It is expected that the rates generated by an increased rating base at Mangawhai Central will be “in excess of the additional costs of increased demand for council services.” Consequently, the Planner’s Report rejects submissions concerned with the impact of PPC78 on council infrastructure. This begs the question of how far infrastructure investment required off the site to cater for the development and the additional population will be met by the Development Contributions negotiated between the council and Viranda.

There was one bright light for submitters who had major concerns about the impact of increased traffic resulting from the development.

The peer reviews recommend that because of potentially serious traffic issues, the development is limited to 850 lots and that the development of further lots be a “restricted discretionary activity.” This means the developer of future sections will need to prove the roading and infrastructure can cope. The same goes for water supply.

We were also pleased to see that the Planner’s Report accepts our recommendation (which aligns with the view of the Northland Transport Alliance) that there should be a western entry to the site from the Old Waipu Rd. The cost of this, and recommended changes to the Insley Rd/Moir St and Moir St/Molesworth Drive intersections, are among the off-site impacts that we hope to see covered by Development Contributions from the development.