

Submission on The Rise Private Plan Change 83, Notified by Kaipara District Council

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## **1. Introduction**

PPC83 seeks to rezone 56.9 hectares of land at Cove Road and Mangawhai Heads Road from Rural to Residential. This is consistent with the general provision in the current Spatial Plan. The land is elevated, of moderate to easy topography, and provides for a transition between the residential edge of Mangawhai Heads, the rural provisions of Bream Tail Farm, and the natural character of the Brynderwyn range.

While application of an urban zoning to the land is supported in principle, PC83 is opposed on the grounds that as drafted it will result in a form of urbanisation inappropriate to the sensitive, transitional landscape within which it sits, is inconsistent with the character of Mangawhai as a coastal settlement, and will result in a piecemeal development that precludes integrated planning for infrastructure. MMI cannot therefore support it unless provisions are drafted in response to the following matters.

## **2. Synopsis**

PC83 should provide for:

1. Landscape and urban design provisions that reflect the transitional character of the site;
2. Lot sizes large enough to accommodate water tanks, off street parking for multiple vehicles, boats, caravans, and space for on-site manoeuvring to avoid vehicles to avoid backing out over cycle- and walk-ways;
3. A comprehensive local road plan to avoid leaving plans for roads to individual resource and subdivision consents in a contained area with multiple owners;
4. Road reservations of sufficient width to meet the distinctive needs of a coastal township;
5. Integrated storm water plans to cover the entire PC83 area;
6. Committing funding to the necessary expansion of wastewater management, treatment, and disposal infrastructure by setting development impact fees prior to subdivision.

Items 1 and 2, above, call for the revision of the proposed amendments to Chapter 13. Items 3 and 4 call for a binding precinct or structure plan covering infrastructure for the entire PC83 area. Item 6 requires rules within PC83 to committing development impact fees through the Long Term Plan.

MMI seeks revision of the Integrated Transport Assessment to provide for vehicle movements associated with a development well removed from recreational and commercial amenities, and for the summer demands it will make on internal and external movements. The latter must recognise the cumulative impact of increasing traffic on the Mangawhai network and rural feeder roads.

The following paragraphs elaborate on our reservations and the changes we are seeking.

## **3. Character**

### **Diversity and Biodiversity**

The land is situated between a growing coastal settlement and an important scenic landscape. In resource management terms, this calls for a sensitive approach to the transition from urban to rural to natural environment. Despite its largely modified nature, a covenanted site in the north and

streams, wetlands, and pockets of bush elsewhere offer the chance to lift biodiversity within PC83 and enhance the resilience of an increasingly urbanised area.

Protecting and extending the bush buffer and wildlife corridor on the northern boundary through sensitive planting of ridgelines and riparian areas, especially to the east and north of Pigeonwood Place will also offer opportunities for walkways and public reserves, as well as the wetlands, and ponds necessary for natural stormwater management.

### **Residential Provisions**

Despite location at the edge of Mangawhai, the proposed Amendments to Chapter 13 of the Operative District plan promote more intensive urbanisation than the existing residential provisions provide for. This is not in keeping with the character of the balance of Mangawhai. It also contrasts strongly with the integrated lifestyle settlement on the western side of Cove Road (The Sanctuary) which presents a coherent landscape that is consistent with the wider rural and bush setting despite, like PC83, fragmented ownership.

The proposed amendments to the residential provisions of Chapter 13 in PC83 provide for smaller residential sites than prevail in the balance of Mangawhai, more limited setbacks, and greater (impermeable) site coverage. Apart from the impact on character, these will raise practical difficulties in terms of capacity to accommodate summer holiday numbers and associated vehicles, watercraft, and the like.

There are also items subject to discretionary provision in which the discretionary criteria are both limited and ill-defined (e.g., 13.10.14 Retirement Facility), or likely to provide for variable outcomes as individual subdivisions proceed. The risk is that they allow a level of intensive urban development inappropriate in an area of transition between low to medium density coastal settlement, low density rural and lifestyle uses, and wilderness (bush) land cover.

Given reliance on individual subdivisions to respond to loosely defined provisions, it is unlikely that coherence of design and consistency of outcomes will be achieved in the PC83 landscape without a more integrated approach and without relating policies and rules to desired outcomes.

This applies also to infrastructure provision.

## **4. Infrastructure**

### ***Integrated Planning***

PC83 covers some 30 titles and multiple owners. Under these circumstances, leaving infrastructure and public space provisions to be determined through individual subdivision applications over an indeterminate period will undermine the capacity of the Council to undertake the necessary integrated planning. A piecemeal approach to infrastructure will lead to diverse, potentially inconsistent, low-cost provisions, poor urban outcomes, and adverse cumulative effects.

Infrastructure planning need to be integrated and coordinated over the entire area through preparation of a comprehensive precinct plan into which the skeletal precinct plan for Cove Road North Precinct can be integrated. The precinct plan should provide sufficient certainty that subdivision can proceed with infrastructure plans in place and long-term funding committed.

### **Transport Networks**

The principal roading, cycling, and walking networks within the PC83 need to be designed across the entire site and their connections with existing Mangawhai networks identified. As it stands, the Urban Design Plan illustrates some movement principles but does not provide the detail necessary to ensure that they are achieved. Key network components need to be located through PC83 to avoid leaving pockets of land stranded when “full” development is achieved.

### **Wastewater**

Similarly, PC83 needs to incorporate the wastewater collector network and include a policy that provides for subdivision to proceed only if the infrastructure plans for the entire PC83 area and capacity for the land subject to subdivision are in place.

Provision for funding new public wastewater infrastructure through development contributions should be made explicit and linked to the Long-Term Plan.

Given the assumption that wastewater will be processed through EcoCare, uncertainty over its expansion means that no development can proceed before capacity for the entire area is committed. With no certainty over when that might be and whether it will be affordable, PC83 needs to include that principle as a rule.

Alternatively, provision for on-site treatment to the appropriate standard for the entire area may be provided for as a discretionary activity, with the requirement for design and funding to be committed prior to proceeding with subdivision.

### **Roads**

Plans for key on-site roads should be finalised through PC83 prior to subdivision to ensure consistent standards and capacity appropriate to the entire site. The roading plan needs to recognise through the underlying policy and rules the peak pedestrian, cycle, car traffic, and parking requirements associated with a summer holiday destination through generous and well-designed corridors, and on- and off-lot parking provision. Again, this requires incorporation into a PC83 precinct plan.

We note the expectation for around 380 lots at full development, with traffic movements estimated at 8 to 9 per household in the summer period. This is based on the high end of “*previous investigations*” of traffic movement in Mangawhai, expected to be offset somewhat by improved pedestrian facilities. Given the distance from commercial and recreational amenities, we do not expect pedestrian and cycle access to commercial and recreational facilities to displace car transport to any significant extent.

Further, the integrated traffic assessment reported 14 movements/day for The Sanctuary (Robert Hastie Drive) households in November 2021 (i.e., not in the summer peak), although claimed that this figure was “*significantly distorted by construction traffic at the time*” (page 8). Retaining 9 movements for the analysis of traffic from The Rise implies that over 40% of Sanctuary traffic was construction related, an unreasonable assumption. It also assumes that similar levels of non-residential traffic will occur in The Rise despite provision for much more intensive development.

The traffic estimates are therefore considered to be light, particularly with reference to summer season.

It also appears that traffic analyses for off-site intersections and bridges were based on historic traffic levels and did not allow for the development of Mangawhai Central, among others, nor do they appear to be related to the summer peak period.

### ***Stormwater***

Two streams flow through the subject land, one of which receives runoff from upstream. Those streams and other lowland wetland areas need to be enhanced and properly maintained to function so they can handle stormwater flows during extreme and even typical rainfall events, while also functioning as attractive ecological backdrops to development.

The provision for small lot sizes will intensify run-off locally. The streams drain into the upper reaches of Mangawhai Harbour in the vicinity of Forest Stream, the Cove Rd bridge and Jack Boyd Rd, an area flooded in the February 2023 rainstorm (along with the entrance to the Sanctuary). Overdevelopment in this catchment will intensify flows lifting the risk of downstream flooding and increased upper harbour sedimentation and contamination.

Leaving stormwater infrastructure in the hands of individual landowners whose capacity to make the necessary provisions may be constrained, and to future subdividers is inappropriate. A management plan needs to be put in place through PC83 as a condition of proceeding with subdivision.

### ***Water Reticulation***

Water reticulation is omitted from this assessment because it is our view that the development can only practically go ahead in the foreseeable future based on on-site water harvesting and storage at the individual lot level. This is not recognised in the urban design assessment. If this is not provided for in PC83, a rule needs to be included that no subdivision can take place without arrangements for a reticulated supply in place.

#### **4. MMI submits that:**

- The plan change should not be adopted in its present form;
  - The minimum lot size should be increased to at least 600m<sup>2</sup>;
  - The Plan Change needs to be underpinned by a precinct plan, policies, and rules which:
    - Provide consistent and comprehensive design provisions to be applied to the entire site which recognise its transitional nature within an important non-urban landscape;
    - Ensure integrated provision of public space (including ecological reserves), wastewater collection and disposal, stormwater infrastructure, and on-site road, cycle, and pedestrian networks and their linkages to the rest of Mangawhai;
  - The Integrated Transport Plan needs revision;
  - Rules should be included to ensure that subdivision does not take place before the necessary infrastructure is confirmed and funding in place (through the Long Term Plan).
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