

Form 5

Submission on notified proposal for policy statement or plan, change or variation.

Clause 6 of Schedule 1, Resource Management Act 1991

This is a submission on Private Plan Change 85 - Mangawhai East.

Private plan change number: PPC85 | Private plan change name: Mangawhai East

Submissions must be received by 5pm on Monday 18 August 2025.



The purpose of the plan change is to:

a. Rezone approximately 94 hectares of rural zoned land within the Mangawhai Harbour overlay to a mix of residential and commercial zoned land as follows:

- Large Lot Residential 6.3 ha
- Low Density Residential 45.5 ha
- Medium Density Residential 12.5 ha
- Neighbourhood Centre 2.7 ha
- Mixed Use 2.2 ha
- Rural Lifestyle 24.7 ha

Total Area = 94 ha

b. Create a Development Area containing a suite of planning provisions to control and manage subdivision, use and development within the Plan change area.

c. Apply a Coastal Hazard overlay over the land area identified to be potentially subject to coastal hazard where the effects of potential mitigation measures will need to be managed.

d. Include Ecological features maps to convey areas of ecological sensitivity for future protection.

e. Incorporate a Structure Plan into the Development Area to visually depict key features and outcomes required.

f. Make any necessary consequential amendments to the Kaipara District Plan Maps.

You can read the Private Plan Change application documentation on the [Kaipara District Council website](#).

- **PRIVACY ACT NOTE:** Please note that all information provided in your submission is considered public under the Local Government Official Information and Meetings Act 1987 and may be published to progress the process for the private plan change and may be made publicly available.

You can make a submission on more than one provision using this form.

Each textbox can take up to 4000 characters. If your submission has more than 4000 characters, there is an option at the bottom of this page to upload your submission as a document.

- Please provide your details *

1A

Your first and last names

Riverside Holiday Park 2007 Limited

Street number and name

41 Black Swamp Road

Town

Mangawhai

Contact phone

0275430233

Email address for correspondence (one email address only)

paul@riversideholidaypark.co.nz

- Please select your preferred method of contact *

1B

- ☒ Email
☐ Postal

- Do you have an agent who is acting on your behalf? *

1C

- ☒ Yes
☐ No

- If you would like a copy of your submission sent to your agent, enter their email address below.

1D Otherwise leave blank.

mark@planned.co.nz

- If you have any attachments that relate directly to your submission on PPC85, you can upload the file/s
1E here

Please attach the required Documents

- If you are a person who could gain an advantage in trade competition through making a submission on PPC85 you may only make a submission if you are directly affected by an effect of PPC85 that:

1. adversely affects the environment, and
2. does not relate to trade competition or the effects of trade competition.

- Trade competition and adverse effects - select one: *

2A

- ☐ I could gain an advantage in trade competition through this submission
- ☒ I could not gain an advantage in trade competition through this submission

- Would you like to present your submission in person at a hearing? *

2C

- ☒ Yes
- ☐ No

- If others make a similar submission, will you consider presenting a joint case with them at the hearing? *

2D

- ☒ Yes
- ☐ No

- Please submit on ONE provision at a time. Once you have completed your first submission point, you can then select an option to submit on another provision.

- **The specific provision of the proposal that your submission relates to:**

3A

(For example - Zoning)

Zoning

- Do you support or oppose the provision stated above?

3B

- ☐ Support
- ☒ Oppose

- What decision are you seeking from Council?

3C

- ☐ Retain
- ☒ Amend
- ☐ Add
- ☐ Delete

- Your reasons.

3D

The reasons for our submissions are detailed within the attached correspondence from Planned.

**Example -
supports
the growth
of
Mangawhai**

3E Do you want to make a submission on another provision? ☒ Add another submission point
☐ I'm finished

- **The specific provision of the proposal that your submission relates to:**

4A

(For example - Zoning)

Structure plan / development area provisions

- Do you support or oppose the provisions stated above?

4B

☐ Support
☒ Oppose

- What decision are you seeking from Council?

4C

☐ Retain
☒ Amend
☐ Add
☐ Delete

- Your reasons.

4D

The reasons for our submissions are detailed within the attached correspondence from Planned.

**Example -
supports
the growth
of
Mangawhai**

4E Do you want to make a submission on another provision? ☐ Add another submission point
☐ I'm finished

- Thank you for your submission, it has been forwarded to the District Planning Team who will contact you if any further information is required.

A copy of your responses will be emailed to you shortly so that you can save a copy for your files. Please check your spam, updates and promotion folders if it does not appear in your inbox.

If you have any queries at all please email the District Planning Team: planchanges@kaipara.govt.nz or phone 0800 727 059

• [PublicVoice](#)

Submission on Private Plan Change 85 to the Operative Kaipara District Plan 2013

To: Kaipara District Council

Name of submitter: Riverside Holiday Park 2007 Limited (**RHPL**)

This is a submission on a change proposed to the Operative Kaipara District Plan 2013.

Submission Summary

While RHPL has not reviewed the evaluation as to whether or not there is the need for expansion and the creation of a new urban area to complement the existing Mangawhai Township as proposed by Private Plan Change 85 (**PPC85**), they are not opposed to it in principle.

However, PPC85 needs to reflect the unique nature of Riverside Holiday Park, the contribution it makes to the Mangawhai community, and the needs of its 109 shareholders, including the significant capital investment made in respect of on-site amenities and infrastructure.

RHPL, while not opposing the change in zoning generally, do oppose the proposed 'Low Density Residential' zoning of 41 Black Swamp Road. They also oppose the 'Coastal fringe enhancement and public walkway' and question the location of the 'Indicative road' layout detailed within the Appendix 4 Structure Plan. The need to provide traffic control measures and to improve pedestrian connections over the Insley Street Bridge and into Mangawhai Township is also considered necessary.

Background

RHPL has operated Riverside Holiday Park from 41 Black Swamp Road since 1976 and is now operated in accordance with the Camping-Grounds Regulations 1985. Since

commencement of its operation, Riverside Holiday Park has steadily grown and now has 109 shareholders, with shareholders having an interest in the existing holiday cabins located on site. In addition, there are powered and non-powered campsites that are available for paying guests throughout the year along with extensive communal facilities, including a kitchen / lounge / recreation room and shower and ablution blocks.

During the summer, additional campsites are made available on the esplanade reserve that fronts the adjoining inlet, with written agreement having been obtained from Kaipara District Council to allow for this. Of note is that the esplanade reserve is fully maintained by RHPL, including the mowing of grass and the removal of mangroves. A seawall has also been installed along the esplanade reserve (for which resource consent was obtained), which was fully funded by RHPL. Significant capital investment also occurred with respect to the wastewater system that serves Riverside Holiday Park.

Over the past 12 months (365 days), 8,268 adults, 803 children, 140 infants and 1,157 animals (pets) have visited Riverside Holiday Park, which is reflective of the importance it plays in Mangawhai tourism and to the Kaipara District as a whole. The pet friendly nature is a notable characteristic, with other similar facilities not allowing animals.

Reasons for the Submission

As noted in the submission summary, RHPL is not opposed to the overall premise of PPC85, notwithstanding that they have not assessed the merits as to its necessity. However, the importance of the Riverside Holiday Park to the local community and the capital investment of its shareholders must be protected.

In this respect, the following outcomes are sought:

Zoning

RHPL seek that their existing Rural zoning is retained and that the 'Low Density Residential' zone set out within the Appendix 2 'Proposed Zoning Map' is not adopted with respect to 41 Black Swamp Road (Riverside Holiday Park). It is noted that a Rural Lifestyle Zone is proposed for the site to the north at Lot 8 DP 565865 and it is considered that retention of the existing Rural zone will be compatible with that proposition.

The reason for this retention is the associated rating value that is assigned to rural zones, being notably lower than for an equivalent urban zone. Noting that RHPL has no intention of discontinuing Riverside Holiday Park in favour of low-density residential development, nor

does it have any intention of selling the site to a land developer for the same purpose, the proposed residential zoning serves no purpose and is not considered appropriate.

RHPL has operated Riverside Holiday Park in accordance with its rural zoning and has always obtained the necessary resource consents to facilitate change and on-going development. This zoning has not hampered the ability to obtain these consents or facilitate its on-going operation and must be retained. Doing so would not hinder the ability of the remainder of the proposed zoning from being realised, although it would be necessary to impose a no-complaints covenant via zone standards on those immediately adjoining sites, including the proposed 'Rural Lifestyle Zone', to protect the on-going operation of Riverside Holiday Park.

Structure Plan

RHPL are concerned with the details contained within the 'Structure Plan' within Appendix 4, and the following in particular:

- The proposed 'Coastal fringe enhancement and public walkway'. As proposed, this will extend along the coastline between Black Swamp Road and Raymond Bull Road. While it is appreciated that this may appear like a 'good idea' and could be seen to enhance coastal accessibility, it is considered that the practicality and costs have not been duly considered, nor have the actual levels of public benefit.

Both Riverside Holiday Park and Lot 8 DP 565865 are subject to a Coastal Inundation Overlay, as per the 'Proposed Coastal Inundation Overlay Map' within Appendix 2. The practicality of establishing a public walkway within such an overlay in terms of construction costs and on-going repair from damage are unlikely to have been fully considered.

The esplanade reserve adjacent to Lot 1 DP 74423, being the site to the south of Riverside Holiday Park, is protected by rock armouring and is close, at certain points, to the deep inlet channel, such that the practicality of completing the walkway within the reserve and connecting it to Black Swamp Road will likely be both impractical and cost prohibitive.

The above practicalities notwithstanding, the level of amenity that the walkway would offer is questionable at best. It would be a pathway with no purpose, connecting 'nowhere' with 'nowhere'. It would also prevent RHPL from utilising the esplanade reserve (noting that there is a formal agreement with Kaipara District Council to do so) during the busy summer months, with this area being popular with campers, resulting

in significant tourism benefits and contributing to the wellbeing of people and the local community. While RHPL accepts that the reserve is public land, the level of utility gained from its on-going use and function in association with Riverside Holiday Park is considered to notably outweigh any limited benefit that may result from a public pathway that would cost a significant amount of money, would likely be seldom used, and would be prone to damage.

- The proposed alignment of the indicative road is questioned in terms of whether it will provide the most efficient and appropriate mechanism for the movement of pedestrians, cycles and vehicles. There appears to be little to no consideration in respect of any necessary upgrades and improvements to Black Swamp Road, particularly in respect of pedestrian and cyclist connectivity. The comment in section 12.4.4 of the submitted Planning Report, dated July 2025, that the development will be designed to provide a safe and comprehensive walking and cycling network requires further explanation.
- The potential need for improvements and traffic control measures at the intersection of Black Swamp Road, Tomarata Road, and Insley Street, which could be in the form of a roundabout similar to the 'Gateway roundabout' detailed on the Structure Plan in Appendix 4. The comment in section 12.4.4 of the submitted Planning Report, dated July 2025, that the existing road network operates safely and efficiently, including at the intersection of Black Swamp Road and Tomarata Road, requires further explanation. This is particularly so noting that a number of the shareholders of RHPL have expressed concern with 'not feeling safe' when using this intersection. This feeling will only increase with the notable additional movements that will pass through this intersection if PPC85 is approved and no intersection improvements are implemented. The need for improvements should be incorporated into the relevant Rules and Standards within the Development Area Provisions in Appendix 3, which would require implementation once certain development thresholds (e.g., number of dwellings / gross floor area etc.) are reached.
- The proposed cycle way connection across the Insley Street Bridge needs to be further detailed. Pedestrians currently 'take their life in their hands' when crossing this bridge given that the carriageway abuts its sides with no refuge for pedestrians. RHPL consider that it is necessary for improvements to be made in terms of pedestrian and cycling connections over this bridge, which should also be linked to development thresholds within the Rules and Standards contained within the

Development Area Provisions in Appendix 3 (similar those recommended for the Black Swamp Road, Tomarata Road, and Insley Street intersection upgrades).

Outcomes Sought

RHPL has no objection to PPC85 being granted, but only subject to the proposed roading alignment being suitably justified and the following amendments being made:

- Retention of the rural zoning for 41 Black Swamp Road (Riverside Holiday Park).
- Provision for no-complaints covenants within the relevant zone standards that apply to the residential and rural lifestyle zones that adjoin 41 Black Swamp Road (Riverside Holiday Park).
- Deletion of the 'Coastal fringe enhancement and public walkway' from the Structure Plan in Appendix 4.
- The implementation of pedestrian and cyclist connectivity along Black Swamp Road.
- The need for implementation of traffic control measures (preferably a roundabout) at the intersection of Black Swamp Road, Tomarata Road, and Insley Street, which should be linked to development thresholds within the Rules and Standards within the Development Area Provisions in Appendix 3.
- The need for pedestrian and cycling improvements across the Insley Street Bridge, which should be linked to development thresholds within the Rules and Standards within the Development Area Provisions in Appendix 3.

RHPL wish to be heard in support of their submission.

If others make a similar submission, RHPL will consider presenting a joint case with them at a hearing.

For the record, RHPL could not gain an advantage in trade competition through this submission.

Contact Details

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