

## Submission Form (Form 5)

# Submission on Proposed Kaipara District Plan

Form 5: Submissions on a Publicly Notified Proposed District Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991

### Return your signed submission by Monday 30 June 2025 via:

**Email:** [districtplanreview@kaipara.govt.nz](mailto:districtplanreview@kaipara.govt.nz) (subject line: Proposed District Plan Submission)

**Post:** District Planning Team, Kaipara District Council, Private Bag 1001, Dargaville, 0340

**In person:** Kaipara District Council, 32 Hokianga Road, Dargaville; or  
Kaipara District Council, 6 Molesworth Drive, Mangawhai

If you would prefer to complete your submission online, from 28 April 2025 please visit:

[www.kaipara.govt.nz/kaipara-district-plan-review/proposed-district-plan](http://www.kaipara.govt.nz/kaipara-district-plan-review/proposed-district-plan)

All sections of this form need to be completed for your submission to be accepted. Your submission will be checked for completeness, and you may be contacted to fill in any missing information.

**Full name:**

**Phone:**

**Organisation:**

*(\*the organisation that this submission is made on behalf of)*

**Email:**

**Postal address:**

**Postcode:**

**Address for service: name, email and postal address** *(if different from above):*

### Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

### Please tick the sentence that applies to you:

I could not gain an advantage in trade competition through this submission; or

I **could** gain an advantage in trade competition through this submission.

***If you have ticked this box please select one of the following:***

I am directly affected by an effect of the subject matter of the submission

I **am not** directly affected by an effect of the subject matter of the submission

**Signature:**

**Date:**

*(Signature of person making submission or person authorised to sign on behalf of person making the submission.)*

**Please note:** all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

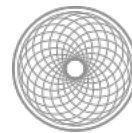
I **do not** wish to be heard in support of my submission; or

I do wish to be heard in support of my submission; and if so,

I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

<b>(1)</b> The specific provisions of the Proposed Plan that my submission relates to are:		<b>(2)</b> My submission is that: <i>(include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)</i>		<b>(3)</b> I seek the following decisions from Kaipara District Council. <i>(Please give precise details for each provision. The more specific you can be the easier it will be for the Council to understand your concerns.)</i>
Chapter/Appendix/ Schedule/Maps	objective/policy/rule/ standard/overlay	Oppose/support (in part or full)	Reasons	

Add further pages as required – please initial any additional pages



ETUD

To: District Planning Team, KDC

From: Jason Evans - ET Urban Design Ltd

Date: 24.6.25

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**Subject: District Plan Submission for Kingsnorth Corporate Trustee Limited, 6-8 Wood St, Mangawhai**

**1. Specific Provision(s) of the Proposed Plan:**

- Zoning Maps – Commercial Zone at 6-8 Wood Street, Mangawhai
- Chapter 11 – Commercial Zone Provisions
- Chapter 18 – Transport and Parking Standards
- Chapter 21 – Built Form and Amenity Provisions
- Chapter 23 – Infrastructure and Servicing
- Chapter 24 – Definitions (noting absence of definition for ‘visual dominance’)
- Appendix / Overlays – Pedestrian Frontage Overlay (clarification required)

**2. Submission:**

**We support** the application of the Commercial Zone to 6-8 Wood Street, Mangawhai in principle. The zoning reflects the site’s role within the Mangawhai town centre and supports the strategic aim of consolidating commercial and mixed-use activity in this location.

However, several key provisions within the Proposed District Plan risk undermining the intent and capacity of the Commercial Zone, particularly in a high-growth context such as Mangawhai. This submission seeks targeted amendments that better align with contemporary urban design principles, regional best practice (e.g. Auckland Unitary Plan), and the practical realities of developing functional, high-quality mixed-use buildings.

## Key Submission Points

### a. **Building Height – Support Increase to 16m + Roof Form Allowance**

- The proposed 12m height limit is too restrictive to enable well-proportioned mixed-use buildings that include ground floor commercial activity.

#### 1. **We request Council:**

- a) A height of 16m, with a further 2m permitted for roof forms or architectural features, would better enable 4-storey development — a typical height limit for walkable, human-scaled town centres. This is consistent with the Auckland Unitary Plan’s Local Centre Zone (H12.6.4) and reflects realistic floor-to-floor height needs (e.g. 4.5m for GFL commercial + 3 x 3.8m upper levels).
- Allowing this modest increase supports higher residential yields, more flexible site layout, and architectural variety while maintaining an appropriate scale for a small town centre.

### b. **Height in Relation to Boundary (HIRB) – Amend Interface Controls**

- The current HIRB recession plane applied where 6-8 Wood Street adjoins residential zoning at 5,7 and 9 Findlay Street is more appropriate to suburban contexts than town centre environments.
- In Mangawhai’s case, this control undermines development potential and creates unnecessary built form constraints.
- We request the replacement of this HIRB with design-based interface controls, such as upper storey setbacks or privacy screening, which are more suitable for urban edge conditions.

### c. **Visual Intrusion and Dominance – Require Clearer Definition and Contextual Guidance**

- The term “visual intrusion and dominance” is listed as a matter of discretion across multiple development standards, including building height, HIRB, and setbacks. However, it is not defined in the plan’s definitions chapter, nor is any interpretive guidance provided.

#### 1. **We request Council:**

- a. Include a clear, urban design-informed definition of visual intrusion and dominance, aligned with accepted planning practice.

- b. Provide contextual guidance or design criteria specific to Mangawhai's Commercial Zone, to support built form that is responsive but not unnecessarily constrained by subjective interpretation.
- This is particularly important if HIRB is to be replaced by more performance-based provisions, as we recommend.
- d. **Parking Requirements – Reduce and Modernise Residential Parking Standards**
  - 1. Requiring two car parks per residential unit in a Commercial Zone, regardless of unit size or location, is inconsistent with planning best practice and suppresses both development feasibility and housing yield.
  - 2. We support a revised, more flexible approach — such as:
    - a. A reduced minimum standard (e.g. 1 space/unit), or
    - b. A managed parking model (e.g. shared spaces, or unbundled parking where parking is leased separately from housing).
  - 3. This aligns with national direction (e.g. NPS-UD) and urban planning principles increasingly used in other small centres.
- h. **Commercial & Retail/Hospitality Parking Requirements – Shift to Public Realm-Based Provision**

The Proposed Plan Requires (Trans Table 2 / Appendix 25C):

- Offices/Commercial: 1 car park per 40 m<sup>2</sup> GFA
- Shops/Supermarkets: 1 per 25 m<sup>2</sup> GFA
- Cafes, Restaurants, Bars: 1 per 10 m<sup>2</sup> GFA (plus 1 per 15 m<sup>2</sup> outdoor dining or one per 4 patrons)

These rates apply cumulatively in mixed-use buildings (e.g. a site with 100 m<sup>2</sup> retail + 80 m<sup>2</sup> office + 60 m<sup>2</sup> café would require 7–8 car parks onsite).

Applying this approach for Wood Street or other commercial centres would be counterproductive to broader development outcomes of the proposed plan and severely undermine the viability of development. Specifically:

- Requiring high ratios of on-site parking undermines continuous active frontages, forcing interruptions for accessways, parking lots, or vehicle forecourts.

- It breaks the street edge, reduces visual coherence, and dilutes the pedestrian experience — especially detrimental in compact, walkable centres like Wood Street.
- It raises the cost of development and tenancy, which ultimately passes on to residents, customers, and small business operators.
- Excessive parking controls promotes car dependency and undermines climate change mitigation goals.
- Parking space requirements consume valuable developable land, particularly on smaller or irregularly shaped sites like those on Wood Street.
- Reduces overall development yield, suppresses mixed-use viability, and makes it harder to deliver compact, higher-value development that supports town centre regeneration.

**We recommend Council:**

1. Remove minimum on-site parking requirements for all commercial, retail, and hospitality uses in the Mangawhai Commercial Zone.
2. Allow developer discretion: on-site parking may be provided if it suits the project, or it can be omitted or minimized in favour of:
  - a. Council-managed public parking
  - b. Shared or precinct-level arrangements
3. Support the shift with policy wording that encourages public/shared parking provision led by Council, especially when adjacent streets or off-site lots can accommodate demand.
4. Reference and align with Auckland Unitary Plan (Chapter E27) structure, which imposes no minimum parking standards in Local Centres, to demonstrate national and urban best practice.

**e. Pedestrian Frontage Overlay – Clarification and Potential Application**

1. The Proposed Plan references active frontage rules, but the Pedestrian Frontage Overlay is not mapped for Wood Street, creating uncertainty.
2. We request that Council clarify whether this overlay is intended for Wood Street. If omitted in error, it should be applied strategically to key active edges to support a vibrant and walkable public realm.

**f. 5 Metre Yard Setback – Modify to Enable Contextual Town Centre Edge Development**

The blanket 5 metre side and rear yard setback applied to Commercial-zoned sites adjoining Residential zones is too blunt in a compact, intensifying town centre like Mangawhai.

We propose a more context-responsive control that:

1. Permits a zero setback for the first 15 metres of site depth measured from the primary street frontage, enabling continuous built edge and viable commercial/mixed-use floorplates.
2. Beyond this 15-metre depth, requires either:
  - a. A 2 metre setback, or
  - b. A design response including upper-level step-backs, privacy screening, or landscaping, particularly at the rear boundary where residential interfaces occur.
3. Alternatively, allow this as a controlled activity standard, enabling performance-based assessment of amenity effects.

This approach retains necessary protections for neighbouring residential amenity but removes a rigid control that could inhibit high-quality, context-appropriate development on smaller town centre sites.

**g. Zoning Continuity – Consider Extension to 2 Wood Street and 244 Molesworth Drive**

1. We recommend that Council rezone 2 Wood Street and 244 Molesworth Drive to Commercial, to create a logical and legible zoning block. This would enhance development coordination across the block and reflect the direction of town centre consolidation.

**h. Infrastructure and Servicing – Request Greater Certainty and Flexibility**

1. We acknowledge the need for development to be appropriately serviced, but seek amendments to ensure that infrastructure limitations do not inadvertently block well-aligned, town centre development.
2. Specifically, we request:
  - a. Greater clarity around planned network upgrades or indicative capacity thresholds in Mangawhai.

- b. Provision for staged or interim development (e.g. reduced yield or on-site solutions) as a permitted or controlled activity rather than defaulting to restricted discretionary.
  - c. Clearer policy support for public-private coordination to facilitate infrastructure improvements tied to town centre intensification.
- 3. These measures would reduce risk and improve certainty for landowners while ensuring environmental standards are upheld.

### **3. Decision Sought from Council:**

- 1. Retain the Commercial Zoning at 4 Wood Street, Mangawhai.
- 2. Amend the maximum permitted height for Commercial Zone sites in Mangawhai Town Centre to 16m, with an additional 2m allowed for roof form or architectural articulation.
- 3. Replace the height-in-relation-to-boundary control with more context-appropriate urban interface standards.
- 4. Include a clear definition and contextual interpretation for “visual intrusion and dominance” to guide consistent consent decision-making.
- 5. Reduce or remove the requirement for two car parks per residential unit in the Commercial Zone; support unbundled or shared parking models.
- 6. Remove all mandatory on-site parking requirements for commercial, retail, and hospitality activities within the Mangawhai town centre Commercial Zone (covering offices, shops, cafés, restaurants, and bars).
- 7. Enable developer discretion to provide parking on-site or rely on public/shared parking infrastructure, supported by Council-led planning.
- 8. Align parking policy with the Auckland Unitary Plan (Chapter E27) for Local Centres, reinforcing a compact, walkable town centre model that prioritizes land use efficiency and active public realm outcomes.
- 9. Clarify and, where appropriate, apply the Pedestrian Frontage Overlay to Wood Street.
- 10. Rezone 2 Wood Street/244 Molesworth Drive to Commercial to support town centre continuity.
- 11. Provide greater policy clarity and consenting flexibility regarding infrastructure capacity and servicing constraints.
- 12. Replace the blanket 5 metre side and rear yard setback rule with a more flexible provision that:
- 13. Permits zero setback for the first 15 metres of site depth from the street frontage; and



14. Applies a 2 metre setback or design-based interface treatment beyond that depth, particularly where adjoining Residential zones.