

IN THE MATTER

of the Resource Management
Act 1991 ("**the Act**")

AND

IN THE MATTER

of a submission pursuant to
Clause 6 of Schedule 1, of the
Act in respect of the **Proposed**
Kaipara District Plan

SUBMISSION ON THE PROPOSED KAIPARA DISTRICT PLAN

To: District Plan Team
Kaipara District Council
Private Bag 1001
DARGAVILLE 0340

Email: districtplanreview@kaipara.govt.nz

1. Details of persons making the submission

EP & M Wright
Ref: 18523
C/- Reyburn and Bryant
Attention: Brett Hood
PO Box 191
WHANGAREI
brett@reyburnandbryant.co.nz

2. General statement

- 2.1 The submitter cannot gain an advantage in trade competition through this submission. They are directly affected by the proposed plan change. The effects are not related to trade competition.

3. Background and context

- 3.1 EP and M Wright own 25.8500ha of land east of Kaiwaka that is accessed from Kaiwaka-Mangawhai Road. It is legally described as Lot 3 DP 173678 (NA106C/445).
- 3.2 The property is accessed via an existing metalled vehicle crossing located adjacent to the western boundary of the site (see **Photograph 1** below).



Photograph 1: Existing vehicle crossing adjacent to western boundary

- 3.3 The land is currently zoned Rural in the Operative Kaipara District Plan.
- 3.4 The Proposed Kaipara District Plan (PKDP) proposes a split zoning for the property of General Residential Zone (GRZ) and General Rural Zone (GRUZ). There is also River Flood Hazard Zones 1, 2 and 3 adjacent to the river (Mountain Creek) running through the north-western part of the site.
- 3.5 The proposed new zones and overlay areas are shown in **Figure 1** and **Figure 2** below.

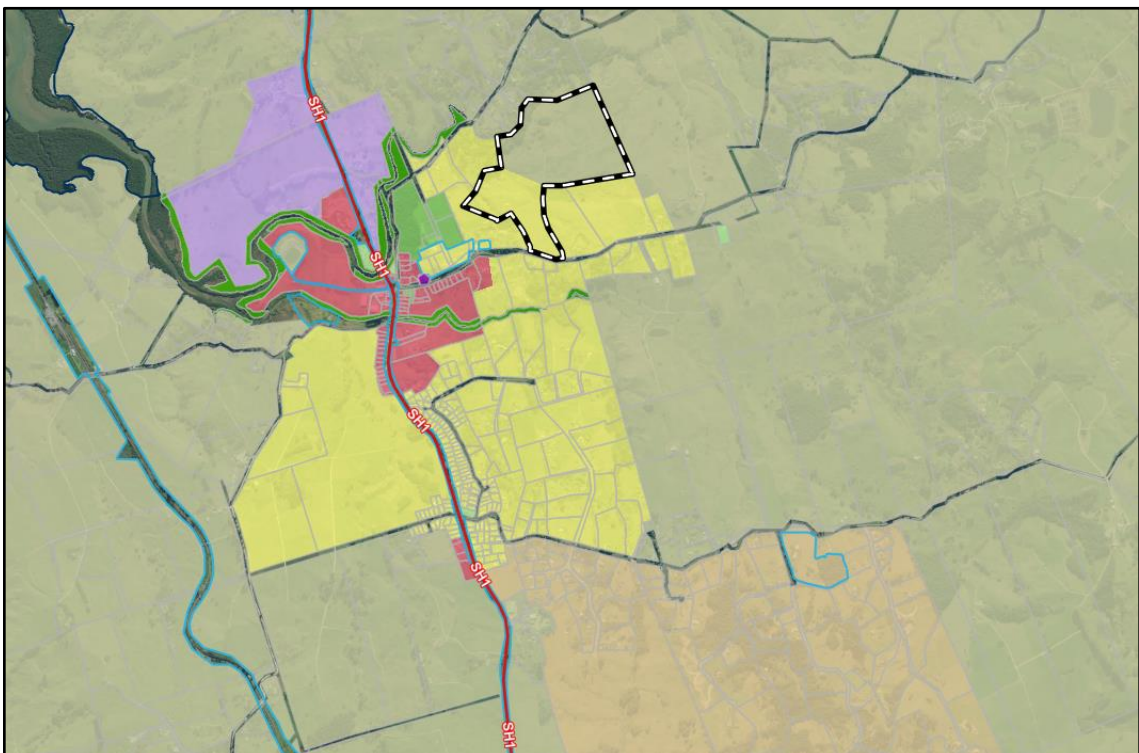


Figure 1: Proposed District Plan zones (yellow + GRZ, light green + GRUZ)

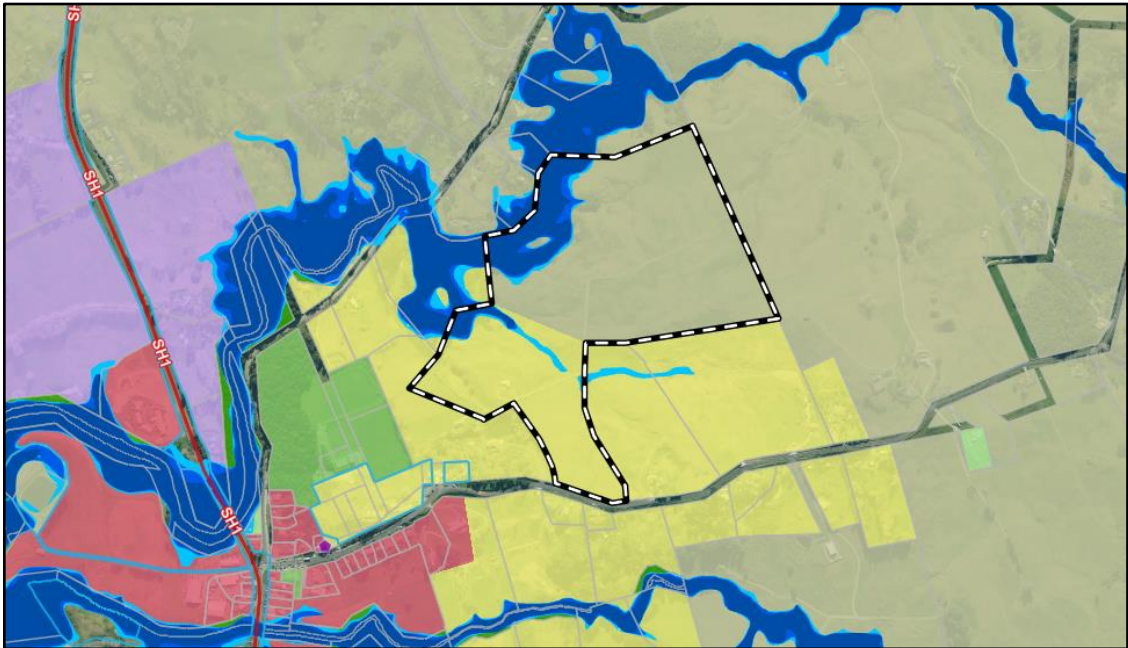


Figure 2: Proposed District Plan Flood Hazards Areas (shown in blue)

The front part of the property to be rezoned GRZ is approximately 8.1ha, leaving approximately 17.75ha to remain GRUZ.

4. The specific provisions of the Kaipara District Plan that this submission relates to are:

- 4.1 The proposed zoning of the subject property and related plan provisions that will have relevance to the use of the land.

5. The submitter seeks the following relief:

- (1) To rezone the northern part of the property Rural Lifestyle Zone (RLZ) rather than GRUZ or alternative relief with similar effect; and
- (2) To retain the proposed GRZ on the southern part of the site.

6. The reasons for the relief sought are as follows:

Section 32 of the RMA

- 6.1 The proposed GRUZ for the northern part of the property is not the most appropriate zone for the land to achieve the purpose of the RMA in the context of Section 32 of the RMA (see Section 32 assessment in **Attachment 1**).

Consistency with Rural Lifestyle Zone provisions

Purpose

- 6.5 The proposed rezoning of the northern part of the subject land to RLZ is consistent with the stated purpose of the RLZ in the PKDP. Specifically, the RLZ is designed to provide for people seeking a rural lifestyle while concentrating development in appropriate locations near urban centres with good access to transport networks and services. To this end, the land in the northern part of the site adjoins the proposed GRZ, with direct access from Kaiwaka-Mangawhai Road and proximity to State Highway 1, making it highly accessible and aligned with the locational intent of the RLZ.
- 6.6 The site is not part of a highly productive rural area (the soils are Class 4 under the NZLRI). It is also surrounded by rural lifestyle development on both Kaiwaka-Mangawhai Road and Gibbons Road (see **Figure 3** below).

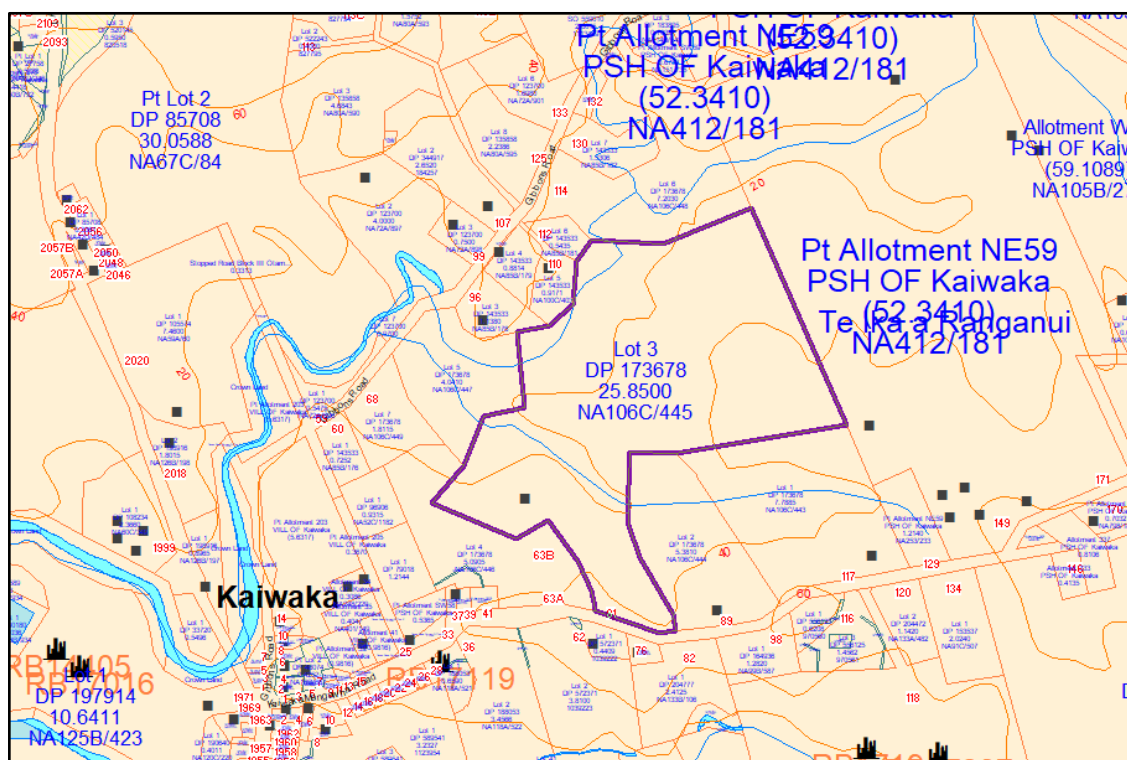


Figure 3: Rural lifestyle development surrounding the site

- 6.7 Rezoning the site RLZ would reduce the pressure for ad hoc subdivision in other areas of the GRUZ, especially those with greater agricultural value, and further away from urban amenities. This aligns with the strategic intent of the PKDP to consolidate lifestyle development in suitable and already compromised areas rather than enabling continued fragmentation of the rural land resource.
- 6.7 In terms of land use character, the subject site is well suited to the intended built environment of the RLZ. It can accommodate low-density residential development with large lots (typically 4,000m² or more), while maintaining open space (including esplanade reserves) and supporting limited small-scale rural activities. Applying the RLZ to the land would ensure that the area continues to reflect the rural lifestyle values anticipated for the RLZ, and would enable a similar development density to that already present along the northern, southern and western boundaries on the site.
- 6.8 Overall, the rezoning of this site to RLZ will assist in meeting the District's strategic growth and land use objectives, avoiding reverse sensitivity conflicts, and focusing lifestyle development in appropriate locations with existing service and transport links.

Objectives and policies

- 6.9 Rezoning the land RLZ aligns with the RLZ objectives and policies as follows:

RLZ-O1 – Land Use Activities

The subject land is well suited to the RLZ as it enables low-density residential development consistent with the lifestyle character anticipated in RLZ areas. The location close to Kaiwaka and accessibility from Kaiwaka–Mangawhai Road supports the development of lifestyle blocks similar to those surrounding the subject land. The land is also capable of accommodating small-scale primary production activities, such as orchards or hobby farms, which would complement and be compatible with the lifestyle character of the zone.

RLZ-O2 – Rural Lifestyle Character and Amenity Values

Rezoning the land RLZ would maintain and enhance the rural lifestyle character of the locality. The topography of the site and landscape features are conducive to integrating new dwellings while maintaining rural amenity values. The proposed RLZ

will ensure the balance between development and open rural outlook is retained, providing an appropriate and graduated buffer between the proposed GRZ and GRUZ.

RLZ-O3 – Primary Production Activities in the General Rural Zone

The proposed RLZ area is physically and spatially separated from more productive land used for intensive primary production. As such, rezoning will not compromise the efficiency or viability of primary production activities in the surrounding GRUZ. Rather, the RLZ acts as a buffer between higher-density residential areas and productive farmland, thereby helping to avoid incompatible land use conflict.

RLZ-P1 – Rural Lifestyle Character and Amenity Values

The proposal meets this policy by facilitating low-density residential development consistent with the anticipated character of the RLZ. The development will retain large lot sizes (typically around 4,000m²), allow for small-scale production or home-based activities, and provide opportunities to incorporate natural features and vegetation. The development will not include urban-scale infrastructure, thereby avoiding a transition to urban character.

RLZ-P2 – Enable Home Businesses and Visitor Accommodation

The RLZ rezoning would allow for flexibility in land use while still aligning with rural lifestyle values. The site would be able to accommodate ancillary activities such as visitor accommodation or home businesses, especially given its proximity to Kaiwaka township and key transport routes. These uses are consistent with the character anticipated under this policy.

RLZ-P3 – Avoid Incompatible Development

The proposed RLZ avoids higher-density residential development, rural industry, and large-scale commercial activities that are not appropriate in a rural lifestyle setting. The anticipated use of the land for lifestyle living, potentially supported by small-scale production or home-based enterprises, is well within the scope of what is intended for this zone.

RLZ-P4 – Reverse Sensitivity Effects on the Adjacent General Rural Zone

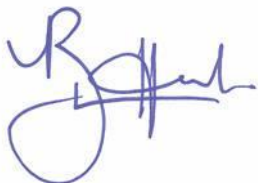
As previously identified, the proposed RLZ acts as a buffer between higher-density residential areas and productive farmland, thereby helping to avoid incompatible land use conflict.

- 6.10 Overall, the subject land is highly suitable for rezoning to the RLZ. It aligns with the spatial planning framework developed for Kaiwaka, supports the intended character and function of the RLZ, and does not compromise the use of adjacent GRUZ land for primary production. The proposed RLZ provides a more appropriate and strategically located opportunity for lifestyle development than other more remote or productive rural land and supports the district's broader goals for managed rural growth and lifestyle opportunities.

7.0 Conclusion and relief sought:

- 7.1 Considering the analysis required under Section 32 of the RMA, and the outcomes sought for the RLZ, the RLZ is a more suitable zone for the northern part of the site than the proposed GRUZ. Accordingly, the submitter seeks to rezone the land Rural Lifestyle Zone (RLZ) and to retain the GRZ for the front (southern) part of the site, or alternative relief with similar effect.

8.0 The submitter wishes to be heard in support of their submission at a hearing.



Brett Hood

Planning Consultant

Dated this 27th day of June 2025.

Section 32 Evaluation – Proposed Rezoning to Rural Lifestyle Zone (RLZ)

Background and Context

EP and M Wright own 25.8500ha of land east of Kaiwaka that is accessed from Kaiwaka-Mangawhai Road. It is legally described as Lot 3 DP 173678 (NA106C/445).

The Proposed District Plan proposes a split zoning for the property of General Residential Zone (GRZ) and General Rural Zone (GRUZ). There are also River Flood Hazard Zones 1, 2 and 3 adjacent to the river (Mountain Creek) running through the north-western part of the site.

The front part of the property to be rezoned GRZ is approximately 8.1ha, leaving approximately 17.75ha to remain GRUZ.

The submitter requests that the part of the land proposed to be zoned GRUZ be zoned RLZ instead.

Section 32 Evaluation

Are the objectives the most appropriate way to achieve the purpose of the RMA?¹

The RLZ better achieves the purpose of the RMA in this context by enabling people and communities to provide for their well-being through access to rural lifestyle opportunities in a location close to urban infrastructure. It also avoids ad hoc rural fragmentation by directing lifestyle development to an appropriate location, thereby

¹ Section 32(1)(a) RMA

supporting sustainable management of natural and physical resources. The RLZ also avoids encroachment onto high-value production land (the soils are classified as Class 4 on the NZLRI), and existing rural character is maintained by enabling similar development to that which adjoins the subject site.

Are the provisions the most appropriate way to achieve the objectives?²

Identification of other reasonably practicable options

- Option 1: Retain proposed GRUZ zoning.
- Option 2: Rezone land to RLZ.
- Option 3: Rezone to GRZ.

Assessment of efficiency and effectiveness

Environmental considerations

- The site is not subject to any ecological overlays or known sensitive environments.
- RLZ development at the 4,000m² lot size is consistent with existing rural character.
- GRUZ would limit subdivision potentially resulting in ongoing fragmentation / development pressure elsewhere.
- GRUZ land uses may result in reverse sensitivity effects for adjoining GRZ.

Economic considerations

- RLZ allows for development of approx. 25–30 lifestyle lots valued at \$300,000–\$400,000 each, totalling \$7.5M–\$12M in land value.
- Estimated \$750,000 development expenditure per lot, supporting \$22.5 million in construction and local business activity.
- Increased rating units under RLZ enhance the district's long-term rating base.

² Section 32(1)(b) RMA

- GRUZ retains lower-value marginal pasture with limited economic utility and lower opportunity for land value uplift.

A comparison economic assessment is provided in Table 1 below.

Table 1: Comparison economic assessment for subject land (RLZ vs GRUZ)

Factor	Rural Lifestyle Zone (RLZ)	General Rural Zone (GRUZ)
Subdivision Yield	Approx. 25–30 lots (at ~4,000 m ² per lot)	Typically 1 lot (1:20ha rule)
Lot Sale Value	\$300k–\$400k per lot → \$7.5M–\$12M total	\$15k–\$25k/ha → ~\$350k total
Development Expenditure (Local Stimulus)	\$750K per lot → \$22.5 million	Negligible (<\$100k)
Local Employment Stimulated	Approx. 80–100 FTEs (3 per dwelling)	<5 FTEs (minimal activity)
Rating Base Contribution	25–30 units @ ~\$2,800/year → \$70k–\$84k/year	1–2 units → ~\$5k/year
Council Development Contributions	\$20k per lot avg. → \$500k–\$600k total	\$0–\$20k
Population Growth Capacity	60–90 people (2.5–3.0 per household)	2–5 people
Infrastructure Impact	Low: on-site servicing, no public network load	Same as RLZ (onsite servicing)

Social considerations

- RLZ supports rural lifestyle living for families seeking larger lots with space for gardens, animals, or home businesses.
- RLZ fosters transitional low density living close to town centres, complementing the proposed GRZ in the front 8.1ha of the site.
- GRUZ limits housing supply diversity and constrains rural lifestyle demand to less suitable or remote areas.

Cultural considerations

- There are no identified sites of significance to tangata whenua on the site.
- Engagement protocols would be followed where any future development identifies archaeological features or values.

Benefits and costs (Section 32(2)(a) and (b))

- Benefits of RLZ include land value uplift, job creation, local investment, rating base growth, and lifestyle choice.
- Costs of RLZ include infrastructure contributions and onsite servicing but these are internalised by developers.
- GRUZ provides minimal economic benefit due to low productivity and limits to subdivision and development.

Risk of not acting (Section 32(2)(c))

There is low risk of insufficient information. The risks of not acting include continued pressure on productive land and uncoordinated lifestyle development.

Conclusion

The assessment under Section 32 of the RMA demonstrates that rezoning the rear 17.75ha of Lot 3 DP 173678 from GRUZ to RLZ is the most appropriate option. It delivers stronger economic, social, and planning outcomes with minimal environmental or

cultural risk. The RLZ promotes efficient use of marginal land and ensures that rural lifestyle living is directed to suitable locations.