

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 (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

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

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) 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>		(3) 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

Proposed Kaipara District Plan – Submission from Bupa Care Services Limited (Bupa)

Provision	Oppose/Support	Reason	Change sought
EESPZ – Estuary Estates (Mangawhai Central) special purpose zone			
Subzone and Structure Plan maps			
Appendix 3 – Estuary Estates Sub-zone Plan	Neutral	Clarification for readability of the zone provisions and associated plans.	In the Legend, label Subzone 8 as: Subzone 8 – Natural Environment
Appendix 2 – Structure Plan	Oppose	<p>The current location of the cycle and walking trail on the structure plan does not provide for a retirement village in subzone 3B. The trail would bisect private land and result in access and safety issues within a retirement village.</p> <p>Enable an alternative location for the trail along the northeast boundary in that area, between the wetland area and the boundary.</p>	Amend the location of the cycle and walking trail through subzone 3B area in the south-west of the Structure Plan area (adjoining Old Waipu Road) to provide for an alternative route.
Objectives			
EESPZ-O5	Support	Provision for a range of residential living opportunities in the Residential sub-zone is supported.	No change to Objective EESPZ-O5.
Policies			

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Residential sub-zone	Oppose	The Residential sub-zone includes a policy specifically for integrated residential development, but the policies do not specifically provide for retirement villages. A policy on retirement villages is requested to recognise the importance of such development to provide housing and care facilities for an ageing population.	Add a new policy under the Residential sub-zone subheading to read: “Provide for retirement villages outside the Coastal Buffer Overlay to enable housing and care facilities to suit the needs of an aging population.”
Rules			
EESPZ-R2 – residential units	Oppose	The Operative District Plan states that that the residential unit density rule (16.5.12) does not apply to a retirement village. The Proposed District Plan is not as clear. There are separate rules for ‘residential units’ and ‘retirement villages’ and dwelling density is not a specific matter of discretion for retirement village applications. However, a definitive statement that density limits do not apply to retirement villages is required to clarify the intent of the Plan.	Add text to either EESPZ-R2 or ESSPZ-R7 to clearly state that the residential unit density in R2 does not apply to retirement villages (retirement facilities).
EESPZ-R7 – Retirement facility	Support	Restricted discretionary activity status is appropriate for a retirement facility. The effects of this activity are well known and	No change to restricted discretionary activity status for a retirement facility outside the Coastal Buffer Overlay.

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		can be assessed and managed through an RDA application.	
EESPZ-TRAN-R1	Support	<p>The rule provides for situations where roading is not located in accordance with the Structure Plan and the matters of discretion relate to access from a site to formed roads.</p> <p>The rule and matters of discretion allow for retirement villages where internal roading layout will provide for access within the site, and connection to the public road network.</p>	No change to restricted discretionary activity status for non-compliance with (1)(a).
Standards			
EESPZ-S1 – Height	Oppose	<p>Community facilities buildings in retirement villages are commonly 12m in height.</p> <p>Provision for greater height for such buildings provides certainty for retirement village developers.</p>	<p>Amend (1)(b) to increase the height standard community facilities buildings in retirement village developments in Sub-zone 3A-3D to 12m.</p> <p>Alternatively, provide for the increased height in Sub-zone 3A and 3B only.</p>
EESPZ-S2 - Building setbacks	Oppose	The yard setbacks and landscape strips in EESPZ-S2(2) (a) to (c) are excessive for residential sites and retirement village developments in Sub-zone 3A-3D.	<p>Delete EESPZ-S2(2) (a) to (c).</p> <p>Alternatively clarify that EESPZ-S2(2) (a) to (c) only applies to Subzones 1 and 7.</p>

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EESPZ-S3 – Height in relation to boundary control	Support	The performance standards in EESPZ-S3 are practical.	No change to EESPZ-S3
EESPZ-S4 – Building coverage	Oppose	<p>Retirement villages are typically a higher density than a residential development. A higher standard of building coverage should be applied.</p> <p>This is appropriate as:</p> <ul style="list-style-type: none"> • Stormwater will need to be collected for water supply in the Estuary Estates area due to lack of municipal water supply; and • Retirement villages are developed taking a site wide approach and include extensive landscaping which addresses potential amenity effects. 	<p>Amend S4 to increase the building coverage standard for retirement village developments in Sub-zone 3B-3D to 50%.</p> <p>Alternatively, provide for the increased building coverage in Sub-zone 3B only.</p>
EESPZ-S5 – Impervious surfaces	Oppose	<p>Retirement villages typically have greater impervious surfaces due to paths and internal roading for access purposes. A higher standard of impervious standard should be applied for the reasons as stated above for Building Coverage.</p> <p>On-site stormwater management is anticipated for any future</p>	<p>Amend S5 to increase the impervious coverage standard for retirement village developments in Sub-zone 3B-3D to 70%.</p> <p>Alternatively, provide for the increased coverage in Sub-zone 3B only.</p>

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		retirement village development in the Estuary Estates area.	
EESPZ-S6 – Outdoor living areas	Oppose	<p>EESPZ-S6(2)(b) requires residential units within a Retirement Facility to have outdoor living area of a minimum size (40m²).</p> <p>Central Government has recently released consultation material on Going for Housing Growth that indicates standards for outdoor living areas would be removed from the matters over which councils can require compliance with.</p> <p>In addition, Bupa has extensive experience with retirement village developments. Outdoor living areas within the villages are provided in response to the needs of the residents. These are often provided in communal areas. The communal facilities, and the residents' relative frailty, mean that retirement village units do not require standard residential sized outdoor living spaces. Therefore a standard in the District Plan is not required.</p>	<p>Either: Delete EESPZ-S6. Or Delete 'Retirement Facilities' from EESPZ-S6(2)(b).</p>
EESPZ-S7 –Screening of storage and service areas	Oppose	The requirement for a solid wall or screen not less than 8m in height	Amend EESPZ-S7(1)(a) to refer to 1.8m in height.

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		to screen a storage or service area is extreme. It is assumed that this is a typographical error. It would be usual to screen to the height of a standard boundary fence – being 1.8m.	
EESPZ-S10 – Water Storage	Oppose	Reticulated water supply from a network supplier (i.e. Council) is not available within the Estuary Estates (Mangawhai Central) area. In relation (4), the requirements for an unreticulated retirement facility are not stated. Compliance with fire safety regulations is a minimum requirement. Provision for collective water storage for rainwater harvesting should also be included. A retirement village developer can then ensure compliance overall within the site.	Amend EESPZ-S10 to provide for unreticulated retirement villages and compliance with fire safety regulations and appropriate rainwater harvesting (including communal storage).
EESPZ-S12 – Cumulative total of residential units	Oppose	It is unclear if EESPZ-S12 would be applied in relation to EESPZ-MAT1-15 Cumulative Effects for a retirement village development. As per the submission points on EESPZ-R2 or EESPZ-R7, clarification around density standards for retirement villages is needed.	Clarify how EESPZ-S12 relates to the assessment of the effects of a retirement village.

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Matters of Discretion			
EESPZ-MAT1 - Matters of discretion for restricted discretionary activities			
EESPZ-MAT1 – 1-12 and 14	Support	The matters of discretion are relevant to assessment of a retirement village, except in relation to EESPZ-MAT1-15 (refer to separate submission point). The exclusion of EESPZ-MAT 13 Intensity and scale is particularly supported as a retirement village development is anticipated to have higher density.	No change to EESPZ-MAT1 – 1-12 and 14.
EESPZ-MAT1 – 15 Cumulative Effects	Oppose	The reference to Cumulative Effects in EESPZ-MAT1-15 is vague and not helpful to assessing a restricted discretionary activity. As currently written, EESPZ-MAT1-15 opens an assessment to all potential effects, which is not the intent of restricted discretionary activity status.	Delete EESPZ-MAT1-15 Cumulative Effects.