

Submission on Proposed Kaipara District Plan
Clause 6 of Schedule 1, Resource Management Act 1991 (Form 5)

To: Kaipara District Council (via email: districtplanreview@kaipara.govt.nz)

1. SUBMITTER DETAILS

Name of Submitters: Safe Guard Self Storage Mangawhai Limited, Northbase Trade centre Limited and 14 Northbase Limited owners of 2-14 Northbase Drive (legally described as:

Northbase Trade centre Ltd

- Lot 2 DP 579625
- Lot 3 DP 579625
- Lot 4 DP 579625

Safeguard Self Storage Mangawhai Ltd

- Lot 101 DP 604898
- Lot 102 DP604898
- Lot 7 DP 579625

14 Northbase Limited

- Lot 8 DP 579625

This is a submission on the Proposed Kaipara District Plan ("PKDP").

Safe Guard Self Storage Mangawhai Limited, Northbase Trade centre Limited and 14 Northbase Limited could not gain an advantage in trade competition through this submission.

2. HEARING OF SUBMISSION

The Submitters' do wish to be heard in support of their submission and will consider presenting a joint case at a hearing with others if they make a similar submission.

Yours sincerely



Katherine Simpson

The Planning Collective Limited

(person authorised to sign on behalf of submitter)

Date: 30 June 2025

Address for Service:

Safe Guard Self Storage Mangawhai Limited;
Northbase Trade centre Limited; and
14 Northbase Limited
C/- The Planning Collective Limited
PO Box 591
Warkworth, 0941
Attn: Katherine Simpson
Email: katherine@thepc.co.nz
Phone: +64-21-422-713

SUBMISSION

The following submission relates to the Proposed Kaipara District Plan as a whole. As such, in terms of scope we reserve the right to provide further submissions or evidence on additional matters as necessary given the interrelationships with submission points.

Overview

Safe Guard Self Storage Mangawhai Limited, Northbase Trade centre Limited and 14 Northbase Limited are key landowners and operators in the Industrial part of Mangawhai Central – Estuary Estates. The extent of their landholdings are shown in the Figure below.



Figure 1: Extent of Landholdings (Source Grip.co.nz) [Accessed 30.06.2025]

Safe Guard Self Storage Mangawhai is bringing much needed self storage provision to the communities of Mangawhai and the wider local area, which has reduced the need for local residents to travel to access these services.

As a key stakeholder in the ‘Service Sub-Zone 7’ of Mangawhai Central, this submission relates to the planning maps and PKDP provisions that relate to the Submitter’s land and Estuary Estates and any other plan provisions that could impact on the land and the activities established or sought to be established. Specific submission points are set out in the Table below.

Points for submission

(1) The specific provisions of the Proposed Plan that my submission relates to are:		(2) My submission is that: (include whether you support or oppose the specific provisions or wish to have them amended and the reasons for your views)		(3) I seek the following decisions from Kaipara District Council. (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.)
Chapter / Appendix / Schedule / Maps	Objective / policy / rule / standard / overlay	Oppose / support (in part or full)	Reasons	
Part 1 – Introduction and general provisions	National Direction Instruments (General)	Oppose in part	<p>Consultation is currently taking place on the national direction for a number of National Policy Statements and National Environmental Standards.</p> <p>The PKDP must give effect to relevant National Policy Statements, National Environment Standards and the National Planning Standards as stated in s75 of the RMA.</p> <p>All associated objectives, policies, rules and standards need to be worded in way that achieves and gives effects to the relevant national policy documents.</p> <p>The provisions need to give effect to these national documents and be specific to</p>	The Submitters seek that the Plan be amended to properly reflect the NPS, NES and National Planning Standards in a way specific to Kaipara and that provides submitters fair opportunity to comment on the detail.

			Kaipara and the Strategic Direction.to its assessment as a result.	
Part 2 – District Wide Matters / Strategic Direction	VK – Vision for Kaipara (SD-VK-01 to SD-VK-08)	Oppose in full	<p>As currently presented, the objectives of the ‘vision for Kaipara’ are not specific to the local area or local communities.</p> <p>The provisions are generically worded and do reflect or respond to specific local issues or characteristics.</p> <p>The objectives and policies proposed do not flow through adequately to the zone provisions, and the wording of the objectives is too generic and insufficiently directive.</p> <p>Whilst we recognize that each individual objective and its topic is of value in its own right, when combined, the objectives as a whole do not represent Kaipara as a District or its communities that live here.</p> <p>We consider there to be some clear omissions within this vision including for greater specificity regarding each topic and the need for all objectives to be supported by policies stating how the objective is intended to be achieved.</p>	The entire section of Part 2 to be reviewed and re-written into a coherent strategic direction in a context more fitting and reflective of Kaipara District.
	HH – Historic Heritage (SD-HH-01)			
	NE – Natural Environment (SD-NE-01 to SD-NE-03)			
	NH – Natural Hazards and Resilience (SD-NH-01)			
	TW – Tangata Whenua (SD-TW-01)			
	UFD – Urban Form and Development (SD-UFD-01 to SD-UFD-05), (SD-UFD-P1 to SD-UFD-P7)			
	FC – Financial Contributions (FC-01 to FC-04), (FC-P2 to FC-P8), (FC-R1), (FC-S1 to FC-S6)			

			<p>When the strategic direction is read in its entirety, including its objectives relating to Historic Heritage, Natural Environment, Natural Hazard and Resilience, Tangata Whenua, Urban Form and Development and Financial Matters the overall format is confusing with some topics only stating objectives, and others additionally relaying both policies and rules.</p> <p>As defined within the National Planning Standards (last updated 2022), <i>Chapter 7, (2) states that '2. Rules must not be included under the Strategic direction heading'</i>. This is clearly not the case currently, with Financial Matters currently listing Objectives, Policies, Rules and Standards.</p> <p>The chapter needs to be rewritten to improve the legibility and strategic direction for Kaipara in a more bold and innovative way.</p>	
Part 3 – Area-specific matters / Zones / Special Purpose Zones / Estuary Estates (Mangawhai Central)	Entire Chapter	Oppose in part	As currently drafted, the Estuary Estates Special Purpose Zone largely reflects the current Estuary Estates detail in the Operative KDP. In this regard, it is considered that the extent of the Service 7 Sub-Zone should be broadened to better reflect the extent that storage and other	Specifically changes to the provisions that directly or indirectly affect the Service zone and subdivision or land use activities occurring or sought to occur in the zone.

			<p>uses similar service operations that could operate in that locality, which reaches far beyond the current definition of local service activities and yard-based retail. We therefore seek for greater flexibility in the sub-zone area which more accurately provides for market demand opportunities and uses in the coming plan period.</p> <p>It is noted that in the Council's response to the PKDP (as stated within the agenda for the Kaipara District Council Open Meeting on the 25 June 2025 at Attachment A (Council Submission to the Proposed District Plan)) that it is proposed to change the status of the Special Purpose Zone to a layer more aligned to the National Planning Standards. This approach is supported however we seek and reserve the right to be notified of this change and provide a submission as required.</p> <p>The submitters' are key landowners in the Service Sub-Zone and which to ensure that future zoning or plan provisions in this location are brought forward in a consistent and enforceable manner.</p>	
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