



**FS99**

THE **PLANNING**  
COLLECTIVE

**Further Submission on Proposed Kaipara District Plan**  
Clause 7 of Schedule 1, Resource Management Act 1991 (Form 6)

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**To:** Kaipara District Council (via email: [districtplanreview@kaipara.govt.nz](mailto:districtplanreview@kaipara.govt.nz))

**1. SUBMITTER DETAILS**

**Name of Further Submitter:** Thelma and Louise Mangawhai Limited, owners of Lot 3 DP 615623, Thelma Road South (legally described as Lot 3 DP 615623).

This is a further submission on the Proposed Kaipara District Plan (“PKDP”). Original Submitter number: 348.

**2. ELIGIBILITY TO MAKE A FURTHER SUBMISSION**

Thelma and Louise Mangawhai Limited have an interest in the Proposed Plan greater than the interest that the general public has as they are owners of land and users of resources directly affected by plan provisions.

**3. HEARING OF SUBMISSION**

Thelma and Louise Mangawhai Limited wish to be heard in support of its submission and will consider presenting a joint case at a hearing with others if they make a similar submission.

Yours sincerely

Burnette O'Connor  
The Planning Collective Limited  
(*person authorised to sign on behalf of submitter*)

Date: 15<sup>th</sup> December 2025

**Address for Service:**  
Thelma and Louise Mangawhai Limited

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**Preferred Method of contact:** Email

FURTHER SUBMISSION

	Name of original submitter	Original submitter number	Original Submission Point number	Support or Oppose	Reasons for supporting or opposing	I seek that the whole (or part) of the submission be allowed (or disallowed)
<b>CE-P6.7</b>						
<b>FS99.1</b>	Te Uri o Hau	84	84.5	Support in part	Support aspects of the submissions that seek CE-P6.7 be deleted. The Submitters' support the need to ask the question as to the appropriateness of the provision.	Allow in part
<b>FS99.2</b>	Dominic Leigh	85	85.5			
<b>FS99.3</b>	KMA IQ Trustee Limited	223	223.13	Support	Support deletion of CE-P6.7. The Coastal Environment Overlay extends over large areas of land which has a right to be developed in accordance with its zoning this criteria is overreaching and therefore should be deleted.	Allow the submission
<b>CE-S2</b>						
<b>FS99.4</b>	KMA IQ Trustee Limited	223	223.14	Support	Support the amendment of CE-S2 to allow for the use of natural exterior materials to be used in development.	Allow the submissions
<b>FS99.5</b>	Daytona Trust	263	263.41			
<b>FS99.6</b>	Tappenden Holdings Limited	289	289.41			

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<b>FS99.7</b>	Bream Tail Residents Association Incorporated	300	300.53			
<b>CE-S3</b>						
<b>FS99.8</b>	KMA IQ Trustee Limited	223	223.15	Support	Support the deletion of CE-S3 Gross floor area as the standard of 300m <sup>2</sup> for all buildings on a site is too restrictive for landowners.	Allow the submissions.
<b>FS99.9</b>	Daytona Trust	263	263.42			
<b>FS99.10</b>	Tappenden Holdings Limited	289	289.42			
<b>FS99.11</b>	Bream Tail Residents Association Incorporated	300	300.54			
<b>FS99.12</b>	WS & R Smellie and McConaughy	349	349.9			

	Name of original submitter	Original submitter number	Original Submission Point number	Support or Oppose	Reasons for supporting or opposing	I seek that the whole (or part) of the submission be allowed (or disallowed)
	Family Trusts					
<b>CE-R1</b>						
<b>FS99.13</b>	KMA IQ Trustee Limited	223	223.17	Support	Support the amendment of CE-R1 so that additions and alterations simply have to comply with maximum height standards, rather than not increasing the height of the existing building.	Allow the submission
<b>FS99.14</b>	Leighway Holdings Limited	251	251.2			
<b>FS99.15</b>	Daytona Trust	263	263.36	Support	Support the deletion of the reference relating to Gross floor area within CE-R1 as the standard of 300m <sup>2</sup> for all buildings on a site is too restrictive for landowners.	We seek that these submission points be allowed in whole.
<b>FS99.16</b>	Tappenden Holdings Limited	289	289.36			
<b>FS99.17</b>	Bream Tail Residents Association Incorporated	300	300.48			
<b>FS99.18</b>	Foodstuffs North Island	247	247.30	Oppose in part	Oppose the retainment of CE-R1 as notified. However, support any necessary consequential amendments as the addition and alteration should simply have to	The submissions should be

	Name of original submitter	Original submitter number	Original Submission Point number	Support or Oppose	Reasons for supporting or opposing	I seek that the whole (or part) of the submission be allowed (or disallowed)
<b>FS99.19</b>	Limited				comply with the maximum height standards rather than not increasing the height of the existing building.	disallowed in part.
	Federated Farmers of New Zealand (Inc) - Northland Province	136	136.112			
<b>NH-P3</b>						
<b>FS99.20</b>	KMA IQ Trustee Limited	223	223.6	Support	Support the submission as a number of sites in the KDC area are covered by a High Risk Area and it not able to be avoided when developing the site for its intended residential purpose.	Seek that the submission is allowed in full.
<b>FS99.21</b>	S Cullen	231	231.25	Support	Support the deletion of NH-P3 as suggested and the proposed wording defined in the submission.	Seek the submission to be allowed.
<b>FS99.22</b>	C & R Williamson	245	245.10			
<b>FS99.23</b>	Journeys End Limited	248	248.21			
<b>FS99.24</b>	Horticulture New Zealand	140	140.27	Oppose	Oppose the retainment of the NH-P3 as notified; as the submitters site is largely subject to the coastal flood area hazard area and is not able to be avoided when developing the site for its intended residential purpose.	Seek that the submission is allowed in part in so far that NH-P3 is retained, however the amendments
<b>FS99.25</b>	Clarus	309	309.120			
<b>FS99.26</b>	New Zealand	330	330.66			

	Name of original submitter	Original submitter number	Original Submission Point number	Support or Oppose	Reasons for supporting or opposing	I seek that the whole (or part) of the submission be allowed (or disallowed)
	Transport Agency					should reflect the submitters proposed amendments.
<b>NH-P6</b>						
<b>FS99.27</b>	KMA IQ Trustee Limited	223	223.7	Support	Support proposed amendments to policy NH-P6 as they account for sites where they are largely covered by the High Risk River Flood Hazard Area, where the hazard cannot be avoided when developing the land for its intended residential purpose.	Allow the submission
<b>FS99.28</b>	Ravensdown Limited	229	229.15	Oppose	Oppose the retainment of NH-P6 as notified, as it does not account for sites where it is largely covered by the High Risk River Flood Hazard Area. The hazard area is not able to be avoided when developing the site for its zoned / intended residential purpose. The policy needs to reflect this.	Disallow the submission
<b>FS99.29</b>	New Zealand Transport Agency	330	330.67			
<b>FS99.30</b>	Foodstuffs North Island Limited	247	247.23	Oppose in part	Oppose retaining NH-P6 as notified, as it does not account for sites that are largely covered by the High Risk River Flood Hazard Area, where the hazard cannot be avoided when developing the land for its intended residential purpose. Support any necessary consequential amendments to reflect this.	Disallow in part
<b>FS99.31</b>	Clarus	309	309.123			
<b>NH-R3.1.b</b>						

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<b>FS99.32</b>	KMA IQ Trustee Limited	223	223.9	Support	Support proposed amendments to NH-R3.1.b as there is no effects-based reason to limit accessory buildings in all other zones to 10m <sup>2</sup> .	Allow the submission
<b>NH-R4</b>						
<b>FS99.33</b>	KMA IQ Trustee Limited	223	223.10	Support	Support deletion of NH-R4.1.b and the amendment of NH-R4.3 to provide for a discretionary activity, rather than a non-complying activity, where NH-R4.1.c is not met. Given the submitter's site is largely covered by the High Risk River Flood Hazard Area, where the hazard cannot be avoided when developing the land for its intended residential purpose, a non-complying activity status would be unreasonable.	Allow the submission
<b>NH-R7.1.a.ii</b>						
<b>FS99.34</b>	KMA IQ Trustee Limited	223	223.11	Support	Support proposed amendments to NH-R7.1.a.ii as there is no effects-based reason to limit accessory buildings in all other zones to 10m <sup>2</sup> .	Allow the submission
<b>NH-R8</b>						
<b>FS99.35</b>	KMA IQ Trustee Limited	223	223.12	Support	We support the submission in full because it better reflects the activity status requirements.	Allow the submission.
<b>FS99.36</b>	Horticulture	140	140.37	Support	Oppose retaining NH-R8 as notified as it should be amended to reflect the	Disallow the submission in part

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	New Zealand			in part	deletion of NH-R8.1.a and NH-R8.1.c and amend NH-R8.3	as it does not incorporate the submitters changes suggested
<b>FS99.37</b>	Adam Booth	67	67.3		Support any consequential or alternative amendments required to address the concerns raised by the submitter.	
<b>FS99.38</b>	Silver Fern Farms	287	287. 105			
<b>FS99.39</b>	Fuel Companies (BP, Mobil & Z Energy)	311	311.45			
<b>Mangawhai/Hakaru Managed Growth Area</b>						
<b>FS99.40</b>	Evolve Planning and Landscape Architecture	50	50.2	Support	<p>We support the deletion of the Mangawhai/Hakaru Managed Growth Area and associated provisions (such as SUB-P12) for the following reasons:</p> <ul style="list-style-type: none"> <li>The policy structure is flawed. Limiting growth in the Mangawhai / Hakaru Managed Growth Area, whilst enabling ad hoc growth elsewhere in the rural areas does not achieve outcomes consistent with sounds resource management practice and will not achieve the purpose or principles of the RMA. This policy direction will potentially generate the type of adverse effects that have resulted in the cadastral and development pattern in the mapped 'Managed Growth Area'.</li> <li>The Plan should provide clear but positive direction for growth including mapping of areas for growth now and in the future. The Managed Growth Area does not appear to have been ground-truthed; applies to a significant area, including applying to the existing urban areas of Mangawhai and Mangawhai Heads.</li> </ul>	Allow the submissions
<b>FS99.41</b>	Blair Hilditch	86	86.1	Support		
<b>FS99.42</b>	S Cullen	231	231.7	Support		
<b>FS99.43</b>	Foodstuffs North Island Limited	247	247.15	Support		
<b>FS99.44</b>	Te Whai Bay Wines	290	290.1	Support		
<b>FS99.45</b>	Bruce Nelder of B&C Family Trust and	362	362.2	Support		

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	Nelder Farms Ltd				<ul style="list-style-type: none"> <li>Restricting growth in the Managed Growth Area and requiring any subdivision resource consent to be assessed as a Discretionary activity is providing insufficient guidance and is imposing significant costs and limitations on landowners within the mapped area for at least the next 10-years (life of the District Plan).</li> <li>A more directive and managed approach is required, for example by identifying defined areas for rural living opportunities to be provided, thus minimising reverse sensitivity effects and effects on productive rural land and associated horticultural and farming activities.</li> <li>The PKDP needs to clearly state the short, medium and long-term vision for the growth of Mangawhai and set clear strategic objectives and policies to achieve the required and desired outcome that reflects the legal requirements to provide for growth whilst also reflecting the type and nature of growth the community wants. The 'Managed Growth' area does not achieve this outcome.</li> </ul>	
<b>FS99.46</b>	P Ryan	256	256.6	Support		
<b>FS99.47</b>	Tovolea Farm Ltd	291	291.1	Support		
<b>FS99.48</b>	Moir Point Park Developments	280	280.4	Support		
<b>FS99.49</b>	Murphy Property Development Limited	282	282.8	Support		
<b>FS99.50</b>	Horizon Surveying & Land Development	315	315.5	Support		
<b>FS99.51</b>	J Warden	319	319.2	Support		
<b>FS99.52</b>	David Medland-Slater	7	7.1	Support		
<b>FS99.53</b>	Adam Booth	67	67.5	Support		
<b>FS99.54</b>	Moir Point Park	280	280.3	Support		

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	Developments					
<b>FS99.55</b>	Astute Consulting	110	110.1	Support		
<b>FS99.56</b>	Cabra Mangawhai Ltd & Pro Land Matters Ltd	216	216.51	Support		
<b>FS99.57</b>	Richard Ruiterman	77	77.5	Support		
<b>FS99.58</b>	S Cullen	231	231.21	Support		
<b>FS99.59</b>	C & R Williamson	245	245.8	Support		
<b>FS99.60</b>	Foodstuffs North Island Limited	247	247.14	Support		
<b>FS99.61</b>	P Ryan	256	256.14	Support		
<b>FS99.62</b>	Mangawhai Hills Limited	277	277.8	Support		
<b>FS99.63</b>	Moir Point Park Limited	280	280.3	Support		
<b>FS99.64</b>	Fire and Emergency New Zealand	308	308.11	Support		

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<b>FS99.65</b>	Richard Ruiterman	77	77.11	Support		
<b>FS99.66</b>	Astute Consulting	110	110.1	Support		
<b>FS99.67</b>	P Ryan	256	256.21	Support		
<b>FS99.68</b>	Mangawhai Matters Inc	177	177.9	Oppose	<p>We oppose the retention of the Mangawhai/Hakaru Managed Growth Area and associated provisions (such as SUB-P12) for the following reasons:</p> <ul style="list-style-type: none"> <li>The policy structure is flawed. Limiting growth in the Mangawhai / Hakaru Managed Growth Area, whilst enabling ad hoc growth elsewhere in the rural areas does not achieve outcomes consistent with sound resource management practice and will not achieve the purpose or principles of the RMA. This policy direction will potentially generate the type of adverse effects that have resulted in the cadastral and development pattern in the mapped 'Managed Growth Area'.</li> <li>The Plan should provide clear but positive direction for growth including mapping of areas for growth now and in the future. The Managed Growth Area does not appear to have been ground-truthed; applies to a significant area, including applying to the existing urban areas of Mangawhai and Mangawhai Heads.</li> <li>Restricting growth in the Managed Growth Area and requiring any subdivision resource consent to be assessed as a Discretionary activity is providing insufficient guidance and is imposing significant costs and limitations on landowners within the mapped area for at least the next</li> </ul>	Disallow the submissions.
<b>FS99.69</b>	Strategic Property Limited as Development Manager of Mangawhai Central	288	288.2	Oppose		
<b>FS99.70</b>	Northland Regional Council	332	332.47	Oppose		
		332	332.47	Oppose		
<b>FS99.71</b>	J & C Hawley	272	272.18	Oppose		

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				<p>10-years (life of the District Plan).</p> <ul style="list-style-type: none"> <li>• A more directive and managed approach is required, for example by identifying defined areas for rural living opportunities to be provided, thus minimising reverse sensitivity effects and effects on productive rural land and associated horticultural and farming activities.</li> <li>• The PKDP needs to clearly state the short, medium and long-term vision for the growth of Mangawhai and set clear strategic objectives and policies to achieve the required and desired outcome that reflects the legal requirements to provide for growth whilst also reflecting the type and nature of growth the community wants. The 'Managed Growth' area does not achieve this outcome.</li> </ul>	