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**STATEMENT OF EVIDENCE OF EVAN JAMES COOK**  
**ON BEHALF OF**  
**AWAKINO POINT RATE PAYERS INC**  
**PRIVATE PLAN CHANGE 81 – DARGAVILLE RACECOURSE**  
**25 May 2023**

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1. **INTRODUCTION**

1.1 This statement has been prepared on behalf of the Awakino Point Rate Payers Inc (APRP) who were submitters to Private Plan Change 81(PPC81) to the Kaipara District Plan (KDP).

1.2 APRP presented evidence in support of their submission to the panel on 28 March 2023. The hearing was then adjourned to allow the applicant to provide further information.

1.3 The applicant has prepared two reports:

*- Recreation Assessment – Plan Change 81 Dargaville Racecourse; Independent Expert Assessment 8 May 2023; Peter Burley & David Allan; and*

*- Economic Assessment Against the National Policy Statement on Highly Productive Land; Fraser Colegrave, Danielle Chaumeil & Nicholas Keith, May 2023.*

1.4 I have reviewed these reports and offer the following comments to the Hearing Panel for consideration.

2. **NATIONAL POLICY STATEMENT ON HIGHLY PRODUCTIVE LAND (NPS-HPL)**

2.1 The NPS-HPL provides guidance to councils on how to map and zone highly productive land, and manage subdivision use and development on highly productive soils.

2.2 Section 3.6(4) outlines situations where territorial authorities that are not Tier 1 or 2 may allow urban rezoning of highly productive land.

2.3 It was agreed at the hearing that KDC is not a Tier 1 or 2 territorial authority. It was also agreed that the 23% if the PPC81 site contains highly productive land.

2.4 To allow the rezoning of the highly productive land on the racecourse site the following conditions must be met:

*(4) Territorial authorities that are not Tier 1 or 2 may allow urban rezoning of highly productive land only if:*

*(a) the urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district; and*

*(b) there are no other reasonably practicable and feasible options for providing the*

*required development capacity; and*

*(c) the environmental, social, cultural and economic benefits of rezoning outweigh the environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.*

2.5 If these conditions are met section 3.6(5) applies

*(5) Territorial authorities must take measures to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment.*

2.6 The applicant's economic assessment considers that the tests of s3.6(4) apply and concludes that:

- *The proposal is required to provide short-medium term capacity under the NPSUD; and*
- *There are no other reasonably practicable and feasible ways to provide the required development capacity elsewhere in Dargaville in a timely manner; and*
- *The economic costs and benefits of PC81 far outweigh those of any foregone rural production undertaken on the site.*

2.7 The APRP disagrees with these conclusions and offers the following comments.

### **3. NEED FOR RESIDENTIAL CAPACITY – NPS HPL 3.6(4)(A)**

3.1 The Applicants Economic Assessment against the NPS-HPL estimates the need for another 360 dwellings over the next 10 years, equating to an average of 36 per year.

3.2 KDC building consent statistics show 22 new dwellings were consented in Dargaville in 2021, and 15 in 2022.

3.3 On 1 March 2023 the Infometrics Report on Kaipara District Council Population Projections was presented to Council. This was accompanied by Council Report "Kaipara, Place, People and Key Trends, Kaipara District Environmental Scan 2023".

3.4 The Infometrics Report confirmed that whilst growth is projected to be strongest in the Mangawhai over the medium and long term, with moderate growth across the rest of the

district, it is projected that there will be only slow growth in Dargaville with the population expected to increase from 5,214 in 2022 to 6,420 in 2054<sup>1</sup>.

- 3.5 In contrast to this recent impartial information, the Applicant’s economic report has selected the high projection rates with an increase of “more than 400 people over the next 10 years”.
- 3.6 Infometrics predict that Dargaville will experience household growth of 0.6% from 2024-2034, and 0.4% from 2034-2054. This equates to a growth from 2,100 households in 2022, to 2,499 households in 2054, or an additional 399 households over 30 years<sup>2</sup> (13.3 per year).
- 3.7 The Applicants economic assessment suggests that 360 of the 399 dwellings (Infometrics figures), or 90% of the dwellings required by 2054 is required in the next 10 years. This suggests that the applicants projected household demand is erroneous and has been significantly overstated.
- 3.8 The growth projections in the Applicants economic report are also in conflict with the Applicant’s own Recreation Assessment, which predicts 20% growth of Dargaville from 5,000 to 6,000 residents<sup>3</sup>. The recreation assessment states that currently the average household population is 2.37 people per dwelling but expects this to drop to 2.14 by 2051. This would suggest that between 422 and 467 new dwellings would be required to accommodate the extra 1000 residents by 2050 (15-17 per year).
- 3.9 It is noted that the Applicant’s predicted demand for 360 dwellings include 128 social houses. While APRP recognise the need for social housing we consider It is problematic to include the

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<sup>1</sup> Table 4.3.2.1 Differing rates of population growth across Kaipara’s communities (Infometrics, 2023b), Kaipara District Environmental Scan 2023

<https://pub-kaipara.escribemeetings.com/FileStream.ashx?DocumentId=6896>

<sup>2</sup> Table 4.3.3.1: Household growth projections across Kaipara’s communities (Infometrics, 2023b), Kaipara District Environmental Scan 2023.

<https://pub-kaipara.escribemeetings.com/FileStream.ashx?DocumentId=6896>

<sup>3</sup> Global Leisure Group Limited - Plan Change 81 Dargaville Racecourse – Independent Expert Assessment, Page 4.

demand for social housing in the housing projections, given that demand for a free or heavily subsidised house is likely to be unlimited, and its development is therefore only constrained by supply side factors. In effect the applicant could inflate their housing demand to whatever numbers they like to justify their development based on the demand for social housing.

- 3.10 In summary APRP consider that the growth projections considerably overstate the demand for new dwellings in Dargaville over the next 10 years and that PPC81 is not required to provide sufficient development capacity in Dargaville over the longer term.

#### **4. RESIDENTIAL SUBDIVISION CAPACITY**

- 4.1 APRP considers that the economic report has overstated the demand for new housing in Dargaville and also understated the ability for this to be provided for through the existing KDP provisions, and future rezoning proposals in the Dargaville Spatial Plan (to be given effect in the near future by the Proposed District Plan).

- 4.2 The report assumes that only 50% of the vacant parcels (with capacity for 64 dwellings) will be developed over 10 years.

- 4.3 The report also assumes that only 80% of the parcels technically feasible for subdivision will also be financially viable, and that only 25% of them will be developed over the next 10 years.

- 4.4 It is unclear how these percentages were arrived at, particularly given that the applicant claims that there are increased prices and housing affordability issues in Dargaville which would encourage the development of vacant land.

- 4.5 It appears to APRP that the figures in the economic report may have been manipulated to ensure that it reaches the conclusions that suit the applicant's case for rezoning Highly Productive Land.

#### **5. OTHER DEVELOPMENT OPTIONS**

- 5.1 Table 8 of the economic report identifies a capacity shortfall of 312 dwellings. The report contends that there are no other reasonably practicable and feasible ways to provide the same capacity.

- 5.2 The applicant is only focusing on development capacity that is ready to develop over the short term within 10 years, however the NPS HPL recognises versatile soils are a finite resource and takes a long term view to protect highly productive land now for future generations.

- 5.3 APRP submits that there are many other reasonably practical options that could provided for the growth of Dargaville over the next 30 years that would avoid the sterilisation of highly productive land, and also avoid increasing the risk of reverse sensitivity effects on adjoining areas of highly productive land in productive use.
- 5.4 Further APRP submits that the long term view is necessary to provide time to plan and fund the required infrastructure upgrades to enable development capacity to be realised.
- 5.5 The report makes some significant assumptions about the development potential of the Awakino River Neighbourhood but acknowledges that it is suitable for development and that it could hypothetically provide for 348 houses if all sections were the minimum size. The author considers that is more likely that there will be a range of sizes, and the likely true yield will be lower “and most likely less than 300”.
- 5.6 The applicant acknowledges that some development is able to be provided (albeit less than 300 houses) which conflicts with their statement that there are no other practicable and feasible options for providing the required development capacity.
- 5.7 APRP disagrees with the report that this area contains HPL “Just like the racecourse”. While there are some class 3 soils along the Awakino River these appear to be outside the PC82 development area. 23% of the Racecourse site is Highly Productive Land.
- 5.8 Also, it appears that the majority of the PC82 land is in the ownership of two landowners which could develop the land separately or together. The assumptions made in the economic report about fragmented ownership should therefore not be relied on.
- 5.9 The applicant appears to discount all other areas, including those areas that the Planners at KDC have spent considerable time and resource identifying through their Spatial and Draft District Plans as being suitable for urban rezoning. If this is true, then Dargaville will have a major problem as once the Racecourse is developed over the next 5 – 10 years the land supply would be exhausted.
- 5.10 APRP is also aware of another current development being undertaken by Far North Holdings on Ranfurly Street. This involves the greenfield development of approximately 2.5ha of residential land and could provided for over 30 dwellings.

5.11 APRP considers that there are several reasonably practicable and feasible options for providing the required development capacity around Dargaville, particularly looking at the medium to long term.

## **6. OTHER MATTERS**

6.1 In their submission and at the hearing APRP submitted that there were errors in the LUC maps and that the extent of highly versatile soils covered a greater extent of the Racecourse Site.

6.2 After the s42a report was released APRP understands that the applicant engaged a soil scientist to undertake a more detailed site assessment, which we understand took two days of fieldwork to complete. The applicant was granted an extension of time to produce and circulate this evidence<sup>4</sup>.

6.3 APRP has not seen the results of the soil sampling and is unaware if this has been provided to the panel. APRP was surprised when the applicants produced the previously circulated Landcare Research Maps<sup>5</sup> at the hearing and not any updated information based on the detailed site assessment they had commissioned.

6.4 Based on local farming knowledge of the area, and with a lack of any evidence to the contrary, APRP continues to believe that the extent of HPL on the PPC81 site has been understated in the LUC maps and that the Class 2 soils cover the majority of the flats on the racecourse land.

## **7. CONCLUSION**

7.1 The proposed plan change will rezone an area of highly productive land to provide for residential and business development in the Rural Zone.

7.2 The land is part of a larger contiguous area of highly productive land used primarily for growing kumara.

7.3 Overall APRP consider that PPC81 is contrary to the direction and provisions of the NPS-HPL and does not meet the tests in 3.4(4)(a) or (b).

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<sup>4</sup> Section 13.4 Statement of Evidence of Vanessa Anich on behalf of the Applicant 10 March 2023

<sup>5</sup> Section 3.1 Addendum Statement of Evidence of Vanessa Anich on behalf of the Applicant 22 March 2023

7.4 In my opinion:

- a) the PPC81 proposal is not required to provide sufficient development capacity to meet expected demand for housing or business land in the district; and
- b) there are other reasonably practicable and feasible options for providing the required development capacity.
- c) PP81 does not give effect to the National Policy Statement for Highly Productive Land
- d) PPC81 has not adequately considered the costs of the proposal with respect to costs on surrounding land use activities, a lack of capacity of heavy industrial land, or costs to taxpayer and ratepayers for infrastructure upgrades.

7.5 Having considered these factors, and taking into account any benefits provided by the development I stand by my earlier conclusions that the proposal is not the most appropriate way of achieving the purpose of the Act.

7.6 I therefore recommend that the application should be declined.



**Evan James Cook**

25 May 2023