

Response to Insight Economics Assessment | PPC81

From Colin and Joanne Rowse

We would like to make comment on the following parts of the document.

Proposed Moonlight Heights Development (PPC82)

Page 5 states “the PC82 site is held by multiple/fragmented owners, none of whom appear to be developers.”

The proposed Moonlight Heights Development (PPC82) on Awakino Road has two owners, one of whom is a local resident, and have been all their lives, the other is a developer.

Furthermore, there is a current residential development happening in Dargaville on Ranfurly Street Extension/4th Avenue area. This 2.5ha area has the potential for approx. 24 or more sections where two houses are being built.



Image | Ranfurly Street Extension / 4th Avenue area

Costs & Benefits

Page 28, Table 11.

The results are tabulated below and reflect total annual spending by 279 new general residential households and 156 new retirement units.

Table 11: Projected Future Spending Originating Onsite

Expenditure Group	Annual Spend per General Residential Household	Annual Spend per RV Unit	Total Annual Spend (\$ millions)
Food	\$10,700	\$7,130	\$4.1
Alcoholic beverages, tobacco, and illicit drugs	\$1,520	\$1,020	\$0.6
Clothing and footwear	\$1,520	\$1,010	\$0.6
Housing and household utilities	\$14,890	\$9,930	\$5.7
Household contents and services	\$2,690	\$1,800	\$1.0
Health	\$2,070	\$1,380	\$0.8
Transport	\$10,430	\$6,950	\$4.0
Communication	\$1,760	\$1,170	\$0.7
Recreation and culture	\$6,710	\$4,480	\$2.6
Education	\$770	\$520	\$0.3
Miscellaneous goods and services	\$5,360	\$3,570	\$2.1
Other expenditure	\$5,520	\$3,680	\$2.1
Total Household Expenditure	\$63,940	\$42,640	\$24.5

Illicit Drugs

We are struggling to understand how 'illicit Drugs' such as cannabis and methamphetamine can be included as an 'Economic Benefit' to this development, to Dargaville or greater Northland? It is well documented how illegal drugs cost the country millions of dollars each year in social harm.

Tobacco

Aotearoa New Zealand is currently making changes to the Smokefree Environments and Regulated Products (Smoked Tobacco) Amendment Act, which came into force on 1 January 2023.

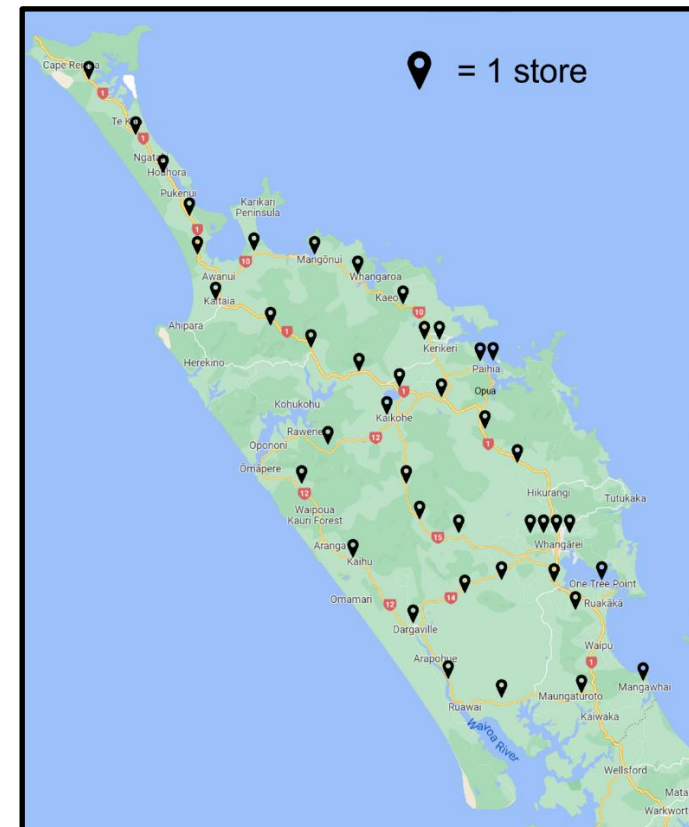
Currently there are around 6,000 retailers of smoked tobacco products in New Zealand. The recent changes to the Act mean that no more than 600 approved retail premises will be permitted to sell smoked tobacco products across the country by 1 July 2024.¹

Dargaville's currently has 13 tobacco retailers within a 1km radius of the town centre, along with two licensed Specialist Vape Retailers located within 150m of each other. The proposed regulations will mean that Dargaville will only have one approved smoked tobacco.

¹ <https://www.health.govt.nz/publication/proposals-smoked-tobacco-regulatory-regime>

Northland Region²

Urban Area	Number of stores
Whangārei	4
Kerikeri	2
Paihia/Kawakawa/Moerewa	2
Kaitiāia	1
Dargaville	1
Kaikohe	1
One Tree Point	1
Ruakākā	1
Mangawhai Heads	1
Rural	28
Total	42



(Image source: Google maps)

² https://www.health.govt.nz/system/files/documents/publications/supplementary_maps_-_indicative_allocation_of_stores_across_new_zealand.pdf

Soil types

Page 29 of the Economic Assessment claims only 23% of the racecourse area is highly productive land.

As stated at the hearings we find the map used in figure 11 to be inaccurate. Most obviously one must ask how the hill area of heavy clay can be classed as LUC Class 3, yet the flat centre of Alluvial soils in racecourse classed only as LUC-class 4?

To show this inaccuracy we dug a 1m deep trench on our property of Alluvial Kaipara Clay (Class 2). The map used in Figure 11 of the Economic Assessment shows this area to be Class 4.



Image | 1m deep trench showing Alluvial Kaipara clay.



Image | Map showing location of the trench and area of Pipeclay Pan

Another inaccuracy in the map used in Figure 11 is its lack of detail to differentiate the area of Pipeclay Pan from the rest of the Racecourse that exists in the Public Carpark, under the Stables and in front of the 'Tote' area.

Flooding

Flood maps used during the hearings by the applicant are also inaccurate, as they do not show the flooding that occurs in the 'Pony club' area of Racecourse after heavy rain events.



Image | Surface flooding in Silver Pine Pony Club after 35mm of rain on 15th September 2022

Given these inaccuracies, how can the application proceed without further investigation?

Observation

At the hearings held on the 27th and 28th of March. There were 14 members of APRP attending in opposition to the application over the day and a half they were conducted. Yet we could not help but noticed there was only one person from the Racing Club attending in support. No one from the Dargaville Community Development Board and no one from Te Runanga O Ngati Whatua (the developer) who make up the 'tripartite group, or anyone else in support of the development were in attendance. If there is such an immediate demand for this development to proceed as claimed by the applicant, where were all it's supporters?