

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of a request to Kaipara District Council for Private Plan Change 81: Dargaville Racecourse by the Dargaville Racing Club Inc

**STATEMENT OF EVIDENCE OF VENESSA ANICH ON BEHALF OF THE APPLICANT**

**PLANNING**

**10 MARCH 2023**

**1. INTRODUCTION**

- 1.1 My full name is Venessa Frances Anich. I am a Senior Planner at Lands and Survey Ltd in Whangarei and Dargaville, a planning, survey and civil engineering consultancy.
- 1.2 I hold a Masters of Regional and Resource Management from the University of Otago, which I obtained in 1995, and a Bachelor of Arts in Geography and Anthropology (double major) from the University of Auckland, which I obtained in 1993.
- 1.3 I am an intermediate member of the New Zealand Planning Institute.
- 1.4 My professional experience spans more than 20 years, where I have worked as a planner in both local government and private consultancies. I was Planning and Policy Manager at Kaipara District Council during the review of the now Operative Kaipara District Plan. I led the Council Team on this review project from pre-notification through the public process to resolution of appeals and the District Plan becoming operative.
- 1.5 For the past four years I have worked at Lands and Survey, where I act for private clients seeking land use and subdivision consents across Whangarei, Kaipara and Far North Districts, and Auckland City. I project manage subdivision and land use projects from concept through to decisions and new certificates of titles issued. I provided planning

advice to clients through the Whangarei District Council's Urban and Services Plan Change process, including appearing at the Hearings and Environment Court mediation process.

1.6 This evidence is in respect of an application by Dargaville Racing Club Inc for Private Plan Change 81: Dargaville Racecourse (PPC81).

1.7 My evidence will:

(a) Summarise my involvement with the development of PPC81;

(b) Summarise the key recommendations of my report;

(c) Comment on issues raised by submitters relevant to my area of expertise;

(d) Comment on the Council Officer's report.

1.8 I have read and agree to abide by the Environment Court's Code of Conduct for Expert Witnesses as specified in the Environment Court's practice Note 2023. This evidence is within my area of expertise, except where I state that I rely upon the evidence of another expert witness as presented to this hearing or a report that formed part of PC81. I have not omitted to consider any material facts known to me that might alter or detract from any opinions expressed.

1.9 I have no conflict of interest to declare.

1.10 I record that as part of my role at Lands and Survey I am currently undertaking planning, communication and engagement work for Waka Kotahi on their Safety Improvement Programme on State Highway 1 between Wellsford to Whangarei. I do not consider that my work on the Safety Improvement Programme affects my ability to give expert evidence for the applicant on PPC81.

## **2. INVOLVEMENT WITH PPC81**

2.1 My involvement in PPC81 began in October 2020 when I was requested by the Applicant to support the research and investigation work for the scoping and preparation of the plan change, culminating in lodgement of the Plan Change documents in February 2022.

2.2 I have visited the site on numerous times since the end of 2020.

- 2.3 I prepared the report entitled Dargaville Racecourse Private Plan Change Request - Statutory Assessment Report (dated 17 February 2022). I collaborated with legal counsel Sarah Shaw on drafting of the TDA - Trifecta Development Area chapter which was submitted as Appendix 2B to PPC81. I also provided part of the response to the clause 23 Request for Information on item 4.1 Open Space and item 5.1 Planning (dated 20 April 2022).

### 3. THE SITE AND PLANNING CONTEXT

- 3.1 The Statutory Assessment Report provides a description of the site, its surroundings and current planning provisions in paragraphs 38-56. I provide a brief summary below:

- The site is largely flat with a raised area in the north-eastern corner. The site is mostly covered in grass with some exotic trees. The natural environment has been modified on this site to support the horse racing use. Other uses of the site include the Dargaville Pony Club in the south-western corner, and the eastern portion of the site is grazed by the neighbouring dairy farm. Mr Cocker's evidence provides a description of the site and surrounding environment.
- The surrounding land uses are predominantly pastoral grazing with some kumara cropping. There is a mix of dairy farming, cropping and rural residential properties.
- The urban edge of Dargaville is located approximately 1.6kms away from the site in a western direction along State Highway 14 (**SH14**). The site has frontage and access to both SH14 and Awakino Point North Road.
- The site is zoned Rural under the Operative Kaipara District Plan (**KDP**), with no Overlay, or site, feature or unit under Map Series Two. The surrounding area is also zoned Rural. The site is partially located within the Flood Susceptibility Area in accordance with Appendix C of the KDP Maps.
- The Kaipara District Spatial Plan (**Spatial Plan**) identifies approximately half of the site as Industrial. Other outcomes identified in the Spatial Plan along SH14 between the site and town include greening the highway, connecting collector road, walk and cycle

connections, and a gateway treatment. Refer Figures 5-9 in the Statutory Assessment Report.

- The Regional Policy Statement for Northland and Regional Plans do not identify any Outstanding Natural Landscapes or Features, Natural Character or Statutory Acknowledgment areas on the site. Nor is the site within the Coastal Environment. The site is located outside both the River and Coastal Flood Hazards. Refer Figures 11 and 12 in the Statutory Assessment Report.

#### **4. BACKGROUND TO THE PLAN CHANGE**

- 4.1 The background to PPC81 is described in paragraphs 32-37 in the Statutory Assessment Report. In summary, as part of a national review of Racing Clubs and courses, a decision was made by the New Zealand Thoroughbred Racing Association to stop racing activities at the Dargaville Racecourse in 2020. Subsequently, the Dargaville Racing Club Inc (**DRC**) applied and successfully received Provincial Growth Funding to prepare a plan change to support the future development of the site. The Plan Change application was a joint proposal between DRC, The Dargaville Community Development Board (**DCDB**) and Te Runanga o Ngati Whatua – collectively known as the Tripartite Group. While the pre-application process for the Plan Change began in late 2020, investigations into a retirement village proposal for Dargaville have been ongoing by the DCDB since 2016.
- 4.2 During 2021 investigations for the re-development of the site were undertaken with over 30 specialists engaged to research, analyse and plan. This included iwi and community consultation, meetings with Council and meetings with the surrounding neighbours. This led to the inception of PPC81.

#### **5. PRE-LODGE MENT MEETINGS WITH COUNCIL**

- 5.1 PPC81 was subject to comprehensive pre-application process with Council staff and Councillors during 2021. The Plan Change was presented to Kaipara District Councillors by the Tripartite Group in February 2021 and December 2021, as well as other information sharing meetings held between Tripartite Group members and either the Mayor, Councillors or senior staff.

5.2 Pre application meetings, email exchanges and phone calls were held with Council staff on numerous occasions throughout 2021. Further details are outlined in paragraphs 379 and 380 of the Statutory Assessment.

## **6. CONSULTATION AND ENGAGEMENT**

6.1 Consultation and engagement were undertaken prior to the lodgement of PPC81. Details are provided in paragraphs 378-391 of the Statutory Assessment, with a summary as follows:

- (a) Kaipara District Council – as above.
- (b) Waka Kotahi - An initial meeting on 22 March 2021, then follow up emails, phone calls and meetings were undertaken over 2021. A letter providing formal feedback was received from Waka Kotahi, dated 18 November 2021. A response from the applicant's transportation consultants Stantec was provided to Waka Kotahi, along with a copy of the Plan Change Statutory Report and the final Integrated Transportation Assessment.
- (c) Northland Transportation Alliance - An initial meeting was held on 22 March 2021, then follow up emails, phone calls and meetings were held over 2021.
- (d) Iwi - A Cultural Impact Assessment (**CIA**) was commissioned (Appendix 11A to the Plan Change request). The engagement process is detailed in paragraphs 12.101 – 12.104 of my evidence. A second CIA was commissioned after the Plan Change request was lodged with Council, undertaken by Te Roroa (Appendix 11B to the Plan Change request).
- (e) Dargaville Racing Club members - Two rounds of meetings were held with the members of the Racing Club in 2021. A summary of the consultation is included as Appendix Two of the Market Demand Analysis (Appendix 7 to the Plan Change request).
- (f) Adjacent property owners - Two rounds of meetings were held with the adjacent property owners in 2021, with a summary of the consultation included as Appendix Two of the Market Demand Analysis (Appendix 7 to the Plan Change request). Subsequent

to these two meetings, further meetings were held with different neighbours including with the Phillips family and with Mr and Mrs Stoddard.

- (g) Wider community - Two rounds of meetings were held with the community in 2021. Again, a summary is in Appendix Two of the Market Demand Analysis (Appendix 7 to the Plan Change request). These were open invite community meetings.

## **7. OVERVIEW OF THE PLAN CHANGE**

- 7.1 PPC81 seeks to change the current Rural zone to a Development Area with a mix of five different sub-Areas: Light Industrial, General Residential, Large Lot Residential, Neighbourhood Centre and Open Space. The proposed District Plan map 10A was submitted to Council as Appendix 2A, and the Trifecta Development Area Chapter including objectives, policies and provisions was submitted to Council as Appendix 2B.

### **Development Area Provisions**

- 7.2 Detail of the Trifecta Development Area five sub-Areas is provided in paragraphs 65-115 of the Statutory Assessment, and summarised as follows:

- (a) Light Industrial Area (**LIA**): this 9.53ha Area shares a boundary with SH14 but will only have access off Awakino Point North Road. LIA provides for industrial activities that do not generate objectionable odour, dust or noise, or give rise to significant adverse effects beyond the site. LIA activities include warehousing, storage, light manufacturing, production, logistics, transport, distribution and servicing activities. LIA also provides for trade retail activities that are compatible with industrial activities such as a garden centre, trade supplies, motor vehicle sales or hire premises. Supporting activities such as cafes and takeaway bars are also provided for. Types of commercial activities are restricted so that LIA complements, and does not compete with, Dargaville. Other non-industrial activities are discouraged so that LIA land is preserved for light industrial and trade type activities. Sensitive activities are restricted within LIA. The external and internal boundaries of the LIA will be managed to ensure reverse sensitivity and compatibility effects are

mitigated. This is done through a combination of setbacks, screen plantings, and a 50m buffer with GRA within which only low noise generating activities may establish.

- (b) **General Residential Area (GRA):** This is the largest Area within TDA at 23.67ha. The average lot size is 500m<sup>2</sup> with a minimum of 400m<sup>2</sup> as a controlled activity, or 300m<sup>2</sup> as a restricted discretionary activity. GRA provides for a range of housing typologies, from traditional stand-alone (detached) residential units to attached units, e.g flats, duplexes or town houses. GRA will be fully serviced with reticulated wastewater, water and stormwater. On-site collection and storage of water is also provided for. Multi-Unit Residential Developments (**MURD**) are provided for, which includes papakainga style living and retirement villages. MURD are when there is three or more residential units on a site, and can include shared facilities, amenities or services, which supports papakainga style living and retirement villages. Higher residential densities are supported through objectives and policies to be located in proximity to the NCA, due to convenient access to facilities, services and amenities. When more than two attached or detached residential units are proposed on a site, then urban design input will be required. Additional setbacks for buildings and screen planting is required if adjoining the Rural zone, the Light Industrial Area, or Awakino Point North Road to manage potential reverse sensitivity and compatibility effects. Some non-residential activities opportunities are provided for, such as small-scale home-based commercial services and visitor accommodation.
- (c) **Large Lot Residential Area (LLRA):** This Area is located on the elevated portion of the TDA site and occupies 3.44ha. LLRA provides for 4,000m<sup>2</sup> sites that rely on onsite servicing for the three waters. Minor residential units are provided, however subdivision between the principal and minor residential unit is not. Given the elevated location, there are strict controls on height, colour and reflectivity.
- (d) **Neighbourhood Centre Area (NCA):** NCA occupies 0.28ha on the TDA site. This is the local shops and community facilities serving

the day-to-day needs of the surrounding residents and workers. The shops will provide a limited range of everyday goods and services, while the community facilities can include shared community spaces (e.g. hall), health care facilities, or early childhood facilities (e.g. kohanga reo). Provisions have been included to ensure the range and scale of NCA activities is compatible with the neighbouring GRA, e.g. floor area limits.

- (e) Open Space Area (**OSA**): There are four types of OSA occupying a total of 5.75ha on the TDA. Hillside OSA is located on the elevated portion of the site. Hauora OSA will be connected with the NCA to complement and support the vibrancy of the NCA. Neighbourhood OSA is a 'pocket park' to be located within easy walking distance to the surrounding GRA. Blue Green OSA has the dual purpose for stormwater management and walking/cycling linkage.

- 7.3 Hauora Hub is centrally located within the GRA. As described in paragraphs 77-81 of the Statutory Assessment, the Hauora Hub denotes the spatial extent within which a mix of three land use Areas will establish, being the NCA, a connected Hauora OSA, with the remaining spatial area being taken up with the GRA. The final orientation and positioning of the NCA and OSA within the Hub's extent will be determined by a Comprehensive Development Plan (**CD Plan**), which must be undertaken before the GRA is developed.
- 7.4 Hauora Hub is an implementation tool, with the intent of giving a degree of flexibility for where the NCA and connected Hauora OSA are spatially located, while providing enough certainty that these two Areas will be centrally located and established within the spatial extent shown as the Hauora Hub.
- 7.5 'Hauora' is a Maori concept of holistic health and wellbeing. The Hauora Hub is intended to be the heart of this new neighbourhood. Local shops and community facilities and services will be located within the NCA. The GRA within the Hauora Hub will have convenient access to amenities as it is co-located with the commercial activities, community facilities and Hauora OSA. This supports Hauora – holistic community health and wellbeing. This is also seen as an opportunity for multi-generational living. Collectively creating wellbeing for this community – Hauora.

7.6 The Development Area's planning framework delivers the Tripartite Group's aspirations and follows best practice urban design and planning principles to deliver a high-quality well-functioning urban environment. The concept development process and the design philosophy for the Development Area are outlined in the Urban Design Assessment and the Concept Development Plan (Appendix 8 to the Plan Change request). The design process has been informed by engagement with the community, stakeholders, mana whenua, and by working closely with the Tripartite Group and technical experts, to achieve a feasible and practical concept design. The design philosophy has been guided by the concept of Hauora – community wellbeing, as an overarching philosophy for the Development Area.

## **8. RELATIONSHIP WITH OPERATIVE DISTRICT PLAN.**

8.1 This is explained in paragraphs 60-63 of the Statutory Assessment. PPC81 is a plan change request to the Operative Kaipara District Plan (**KDP**), however the KDP is currently under review. The KDP is now in its tenth year, and I consider it delivers dated and limited land use outcomes that do not align with the Tripartite Group's vision, best practice urban design, or planning principles. Hence PPC81 seeks a revised planning framework for the TDA than what is available in the KDP, in particular for the two Residential Areas and the NCA.

8.2 The TDA has been drafted to be 'future-proofed' so that it can relatively seamlessly fit into the Proposed District Plan. For example, it is a stand-alone chapter that is consistent with the National Planning Standards. However, some of the KDP rules have been utilised in the TDA Chapter, e.g. excavation and fill rule. I envisage that the same rule in the Proposed District Plan will be able to be used in the TDA.

## **9. Part 2 – Purpose and Principles**

9.1 Pursuant to s74(1)(b) of the RMA, I provide an assessment of PC81 against Part 2 of the RMA - ss5, 6, 7 and 8. The Statutory Assessment for the Plan Change request addressed Part 2 in paragraphs 136-140.

9.2 I note that the s42A Report identified issues with Part 2 due to incomplete information regarding the National Policy Statement: Highly Productive

Land, and the National Policy Statement: Freshwater Management. These matters will be revisited in my Addendum on 22 March 2023.

- 9.3 In my opinion, PC81 is consistent with the purpose of the RMA. PC81 seeks to address the matters in s5 as follows:
- (a) It seeks to enable the wellbeing (social and economic) of the current and future population growth of Dargaville through the appropriate re-zoning of land.
  - (b) The Development Area provisions are appropriate and viable to support future development.
  - (c) It seeks to ensure that the land resource is developed in a manner that achieves a well-functioning urban environment providing for residential and business growth.
  - (d) It seeks to safeguard the life supporting capacity of water by ensuring that provisions relating to the safe and efficient establishment and operation of three waters infrastructure apply at the time of subdivision and development.
  - (e) Adverse effects of urban activities on the environment will be avoided, remedied or mitigated through the PC81 provisions.
- 9.4 PC81 recognises and provides for the relevant Section 6 matters of national importance through the following methods:
- (a) There are no identified areas of high or outstanding natural character, coastal environment, outstanding natural features or landscapes, identified historic heritage or areas of significant indigenous vegetation or significant habitats that require protection on the subject site. This makes the land ideal for urban development.
  - (b) The Applicant has recognised and provided for the relationship of mana whenua. As part of the pre-lodgement of the application, the Applicant engaged with mana whenua and at their request, agreed to commission and resource the preparation of a Cultural Impact Assessment.

(c) The risk from natural hazards (primarily flooding) is not present on the site, as identified by the Northland Regional Council flood hazard mapping.

9.5 PC81 has particular regard to the relevant Section 7 matters through the following methods:

(a) Pre-lodgement consultation has been undertaken with mana whenua, as mentioned above.

(b) PC81 will enable an efficient use of natural and physical resources as it seeks to better utilise the site for a mix of urban land uses. The provisions ensure a greater range of housing typology, lifestyle choices and affordability options, while ensuring that the supply of business zoned land is appropriate to meet the needs of the community and can be developed in a manner which creates an efficient use of the land.

(c) The amenity values and quality of the area have been recognised and will be maintained through the implementation of the proposed setbacks and screen plantings, and through the emphasis on high quality urban design.

(d) Natural ecosystems will be protected and enhanced alongside future development through the Blue Green Open Space Area.

9.6 With respect to Section 8 and taking into account the principles of the Treaty of Waitangi, mana whenua has been consulted through the process of the developing PC81, as outlined above and in paragraph 12.101-12.104 of my evidence below.

## **10. SECTION 32 EVALUATION**

10.1 The section 32 evaluation is covered in paragraphs 329-377 of the Statutory Assessment. That evaluation considered the extent to which the objectives of the Plan Change are the most appropriate way to achieve the purpose of the Act (s32(1)(a)), concluding that overall, the TDA objectives are an effective means of achieving the sustainable management purpose of the RMA, and more effective than the current planning framework or an alternative.

10.2 The s32 evaluation examined whether the provisions (policies and methods, etc) of the Plan Change are the most appropriate way to achieve its objectives by: identifying other reasonably practicable options for achieving the objectives; assessing the efficiency and effectiveness of the objectives; and summarising the reasons for deciding on the provisions (s32(1)(b)). The provisions of the Plan Change were categorised into four themes to aid this evaluation, with each theme divided up into different possible options, as follows:

(a) Land Use Options: with options evaluated - Status quo, Rezone in accordance with the Dargaville Spatial Plan, and proposed Plan Change.

(b) Appropriate provisions to achieve a well-functioning urban environment: with options evaluated – Operative District Plan provisions, and Plan Change provisions.

(c) Managing reverse sensitivity and compatibility with neighbouring Rural zone, between LIA and GRA, and between NCA and GRA: with options evaluated – use Operative District Plan provisions, and Plan Change provisions.

10.3 My s32 evaluation concluded that the Plan Change objectives were the most appropriate way to achieve the purpose of the Act, and the provisions were the most appropriate way to achieve the objectives.

## **11. ASSESSMENT OF ENVIRONMENTAL EFFECTS**

11.1 The assessment of actual or potential effects on the environment (**AEE**) are covered in paragraphs 146-240 of the Statutory Assessment. The AEE was comprehensive, including built environment, economics, social impacts, landscape quality, character and visual amenity, noise, reverse sensitivity and compatibility, natural hazards, cultural, archaeology and heritage, productive potential, soil contamination, infrastructure servicing, stormwater management, transport, ecology and biodiversity, and finally earthworks.

11.2 Based on reporting and analysis undertaken by a wide range of technical experts, the actual and potential effects of the Plan Change were considered with the conclusion that the overall effects of the proposal will be less than minor and acceptable. With the employment of the mitigation

measures, I consider that no persons on adjacent sites will be adversely affected by the future development of the site. The Plan Change will result in positive effects on the environment in terms of social and economic well-being of the wider community. Any potential for adverse effects can be appropriately avoided, remedied or mitigated by the proposed policies and rules of the TDA, in addition to those of the Kaipara District Plan, to the point where such effects will be less than minor.

## **12. SUBMISSIONS**

12.1 I respond to submissions relevant to my expertise below.

### **Reverse Sensitivity and Compatibility**

12.2 The potential for reverse sensitivity effects between residential land use on the site and existing adjacent rural productive activities has been raised by a number of submitters.

12.3 I acknowledge that Waka Kotahi are in general support of the location of the Light Industrial Area adjacent to SH14, as this inherently avoids reverse sensitivity effects on noise sensitive receivers (submission point 5.4).

12.4 I note that the primary productive use of some of the surrounding area comprises mainly of either kumara growing activities or dairy farming. There is an operational dairy farm and milking shed located along the eastern boundary of the site and across Awakino Point North Road (indicated with blue dot on map below). The existing land use surrounding the TDA is described in detail in the Statutory Assessment for the Plan Change request (refer paras 195-197) and shown in **Figure 1** below.



**Figure 1:** Racecourse site and surrounding environment. Blue dot indicated approx. location of dairy milking shed.

- 12.5 The submission points 10.2 (CJ Farms Ltd), 12.4 and 12.5 (Awakino Point Ratepayers Inc) identify potential issues such as roaming dogs and possibly attacks on stock, children from the TDA playing on the farm, and complaints from future residents about the smells, dust and noise coming from the farm.
- 12.6 The Statutory Assessment identified three main mitigation approaches to address the effects of reverse sensitivity and compatibility (para 197). First through landscape and visual mitigation measures, second through noise generation controls, and third, through setback controls for buildings.
- 12.7 The noise generation controls were applied to internal interfaces between NCA and GRA, and between LIA and GRA (refer TDA-NOISE-S3 Neighbourhood Centre Area, and TDA-LIA-R4(1) Activities within 50m of the General Residential Area Boundary and TDA-LIA-R(5) Activities 50m or greater from the General Residential Area Boundary). As internal

reverse sensitivity within the TDA was not raised by submitters, I will not discuss these controls any further.

12.8 Mr Ibbotson's evidence addresses the issue of rural noise and reverse sensitivity, noting that his measurements do not suggest that existing farming activity is causing significant noise emission on Awakino Point North Road.

12.9 There is a suite of measures proposed in the TDA Chapter to address the potential for reverse sensitivity and compatibility effects with external receivers. These are described in detail in the Statutory Assessment (refer paras 198-211 and Table 2). Mr Cocker's evidence addresses the setbacks, screen planting and fencing measures from a landscape and visual perspective.

12.10 The TDA Chapter addresses reverse sensitivity and compatibility through the following methods:

(a) *Objective TDA.1.1(7) Activities are compatible.*

(b) *Policy TDA.1.2(11) Manage potential reverse sensitivity and compatibility effects internally and externally to the Development Area by ensuring that:*

- *Screening is established and maintained*
- *Buildings and structures are appropriately located and scaled*
- *Acoustic controls are targeted at the source rather than the receiver*
- *Activities are spatial located relative to their effects and sensitivities*

(c) Setback controls; and

(d) Screen planting and fencing requirements.

12.11 Based on Table 2 from the Statutory Assessment for the Plan Change request, **Table 1** below provides a summary of the setbacks, screen planting and fencing proposed to address potential reverse sensitivity and compatibility effects.

**Table 1:** Mitigation measures to address potential reverse sensitivity and incompatibility effects with external boundaries to the site.

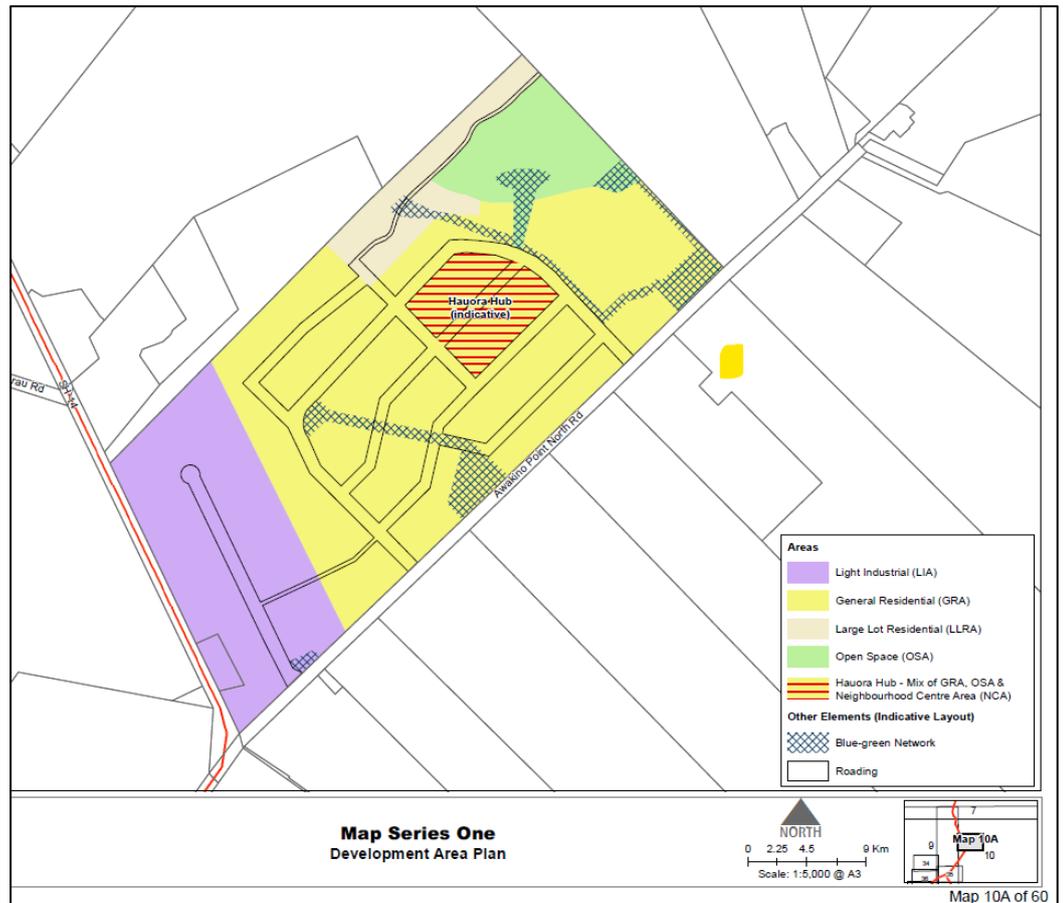
<b>Development Area</b>	<b>Adjoining</b>	<b>Setback</b>	<b>Planting &amp; Fencing</b>
General Residential	Rural Zone	20m (TDA-GRA-S2(1)(g))	Screen planting and fencing (TDA-LU-S2(1))
	Awakino Point North Road	10m (TDA-GRA-S2(1)(a)) Combined with 20m legal road width	Screen planting and fencing (TDA-LU-S2(1))
Light Industrial	Rural Zone	10m (TDA-LIA-S2(1)(d))	Screen planting and fencing (TDA-LU-S2(1))
	State Highway 14	10m (TDA-LIA-S2(1)(a)) Combined with 20m legal road width	Screen planting and fencing (TDA-LU-S2(1))
	Awakino Point North Road	10m (TDA-LIA-S2(1)(b)) Combined with 20m legal road width	Screen planting and fencing (TDA-LU-S2(1))
Large Lot Residential	Rural Zone	10m (TDA-LLRA-S2(1)(c))	No other measures because lower density in Large Lot Residential Area is relatively compatible with the adjoining Rural zone.

12.12 In my opinion these measures collectively adequately address the potential for reverse sensitivity and compatibility effects associated with the interface between existing rural productive activities and proposed residential activities.

12.13 Awakino Point Rate Payers (submission point 12.6) raise the issues that incompatible activities will restrict farming and therefore have economic effects on farming operations. As noted above, measures are in place to

appropriately manage compatibility and reverse sensitivity and therefore I disagree that reverse sensitivity effects will occur.

- 12.14 Regarding the neighbouring dairy farm (CJ Farms Ltd), I note that the Development Area Plan indicates that there will be a Blue Green OSA on the south-eastern boundary of the TDA site, across Awakino Point North Road from the milking shed, feedpad, etc. The Blue Green OSA is also located along the north-eastern boundary with the dairy farm race and paddocks. Further along the north-eastern boundary with the dairy farm there is the Hillside OSA. On the north-western boundary with the dairy farm paddocks is the Large Lot Residential Area. Please refer **Figure 2** below, with yellow dot marking approximate location of milking shed. The Blue Green and Hillside Open Space Areas will provide additional separation and screening between GRA and the dairy farm. The density of LLRA is in my opinion consistent with existing lifestyle properties that currently border with the dairy farm, e.g. Lot 1 DP 59285 at 1,800m<sup>2</sup>, Lot 1 DP 365819 at 9,400m<sup>2</sup>, Lot 1 DP 158696 at 4,100m<sup>2</sup>, Lot 1 DP 377245 at 1ha, and Lots 1 and 2 DP 388838 at 2.2ha and 1.7ha respectively.



**Figure 2:** Yellow dot indicating approximate location of milking shed, and Blue Green Open Space Area on the south-east and north-east boundaries of the Trifecta Development Area with the dairy farm.

- 12.15 Regardless of the TDA and the Plan Change request, this site and the wider area has been identified for change in the Dargaville Spatial Plan (and the Exposure Draft Kaipara District Plan). The existing land uses on and surrounding the site are 'ear marked' for change by Council. For this rural neighbourhood, the status quo is likely to change.
- 12.16 The Awakino Point Rate Payers Inc (submission point 12.5) has compared the setbacks proposed in the TDA to the Operative District Plan separation distance rule in the Rural zone - Rule 12.10.9. I discuss this in detail in the s32 evaluation section of the Statutory Assessment (refer para 362).
- 12.17 Rule 12.10.9 sets as a Permitted Activity threshold, a 300m separation distance between noise sensitive activities (e.g. dwellings) and noise generating activities such as a dairying shed or feed storage area. I consider that 'blanket' approach is warranted as a zone wide Permitted

Activity standard across the Kaipara District, with resource consents providing the opportunity to assess separation distances less than this on a case-by-case basis.

- 12.18 I note that while the current rule specifically applies the setback to dairy milking shed, this is not the only appropriate approach. For example, the Operative Whangarei District Plan Rural Lifestyle Zone rule RLZ-R11 Sensitive Activity applies a 250m setback to intensive livestock farming, which would not cover a dairy milking shed.
- 12.19 The particular situation and surrounding environment to the TDA site was carefully considered when the setbacks, screen plantings and fencing were proposed in the TDA provisions. I note that GRA subdivision rules SUB-S3 Controlled Activity and SUB-S4 Restricted Discretionary Activity are subject to SUB-S13 Matters of Control and Discretion, with point 4 expressly addressing incompatible land uses and reverse sensitivity.
- 12.20 I consider that these measures are appropriate to address potential reverse sensitivity effects for the interface between the TDA site and the surrounding environment.

#### **Change in Amenity, Character and Land Uses**

- 12.21 The change to the amenity and character of the area has been raised by submitters (for example submission point 3.1), in particular effects on wellbeing, hauora, and removal of the peace and quiet because of the increased traffic, parties, dogs barking, fireworks, etc.
- 12.22 I acknowledge that there will be a change to the amenity and character of the surrounding area when the land use on the site changes from rural to urban.
- 12.23 I consider that amenity and character effects are mitigated by measures proposed in PC81 including setbacks for buildings, screen plantings and fencing around the external boundary of the site. How these measures are enacted within the TDA Chapter are itemised above regarding reverse sensitivity (para 12.11-12.12 and **Table 1** above). These measures have the dual purpose of mitigating amenity and character effects, as well as reverse sensitivity effects.

- 12.24 Mr Cocker's evidence addresses the setbacks, screen planting and fencing measures, and effects on rural character and amenity from a landscape and visual perspective.
- 12.25 In my opinion change in amenity and character experienced by the surrounding neighbourhood because of the change in land use on the TDA, must be seen in context. The amenity and character of the surrounding area was different to what it is now when the site was operating as a horse racing venue, particularly on race days.
- 12.26 Further change is on the horizon for this area. As mentioned in the reverse sensitivity section of my evidence, this site and the wider area have been identified for change in the Dargaville Spatial Plan (and the Exposure Draft Kaipara District Plan). The existing land uses on the site and surrounding the site are 'ear marked' for change by Council. Regardless of the Plan Change request, the amenity and character of this area is likely to change.
- 12.27 I note that a positive effect of the Plan Change will be experienced by current neighbours who use Awakino Point North Road as access, in that it will be sealed to accommodate increased traffic from the TDA and the intersection with SH14 upgrade. Refer to the land use transport standard for the entire Development Area – TDA-LU-S4(2)(a) and (e) for GRA and (1)(a) and (d) for LIA.
- 12.28 APRP raise concerns about the loss of the Silver Pine Pony Club, which leases a corner of the Racecourse site (submission point 12.11). APRP ask if the Pony Club use can be accommodated within the TDA. I do not consider that an equine use within the TDA is compatible with the proposed urban land uses. If they were to be located within TDA, then a reasonably large area of the site would have to be set aside to accommodate them plus setbacks distances from the industrial and residential areas. This is not a tenable outcome for the economic viability of TDA. The Pony Club use of the site could also be ended by other uses of the site within its current Rural zoning, or by future users under the Industrial zoning as indicated in the Spatial Plan.
- 12.29 Not being able to continue to be based at the Racing Club site does not necessarily mean that the Pony Club will be 'lost'. Rather, the Pony Club can move to another site, for example the local A&P Show grounds.

**Location of the Trifecta Development Area and Consistency with Higher Order Planning Documents**

- 12.30 A number of submitters have raised concerns about establishing the proposed residential activities in the proposed location, being out-of-town, stating that growth in this location is not consistent with the Northland Regional Policy Statement, Kaipara District Plan or the Dargaville Spatial Plan.
- 12.31 The site is located 2kms (approximately) from the existing edge of Dargaville urban area (Tuna Street) on SH14, an additional 1.8kms (approximately) to the supermarket, and an additional 200m (approximately) to the main shopping area of Dargaville.
- 12.32 There are two outcomes that will result in the TDA being part of Dargaville, rather than separated from it as is currently the case. First, it is proposed that a shared path is established along SH14 to Tuna Street to link up with the existing footpath. The shared path will provide an active transportation option for residents and visitors to the site, thereby ensuring the connectivity of the site and its future residents is provided for, in addition to the existing linkage provided by SH14. This is discussed in detail in para 366-376 in the Statutory Assessment and in the urban design evidence by Ms Dale.
- 12.33 Second, the Dargaville Spatial Plan (and the Exposure Draft District Plan) identifies that Dargaville will grow in an easterly direction towards and including the TDA, shown as New Industrial in the Spatial Plan (Neighbourhood 7). The Spatial Plan also identifies Walk and Cycle Connections along this portion of SH14, in addition to a Gateway to town being located near the site, and a Greening of the Highway. I acknowledge that the Spatial Plan only identifies part of the site for New Industrial. This is addressed in detail in para 53 and 292-297 in the Statutory Assessment.
- 12.34 Based on the shared path linking the site with Dargaville, and the easterly direction of growth the Spatial Plan proposes for Dargaville, I consider that the TDA will not be isolated from Dargaville.
- 12.35 The remainder of the land uses proposed in TDA besides LIA are not included in the Spatial Plan, being the residential land uses GRA and LLRA, and supporting land uses NCA and OSA. I do not consider that

the TDA will undermine the Dargaville Spatial Plan because it has included more urban land uses than just industrial. I consider that the TDA will complement the Spatial Plan because it has been designed to provide a well-functioning urban environment that provides for the day-to-day needs of the residents and workers, that provides for connectivity both within the TDA and to Dargaville, that is fully serviced with reticulated water and wastewater, that manages stormwater to ensure hydraulic neutrality is achieved, and that ensures potential reverse sensitivity and compatibility within the TDA and with the neighbouring rural land uses is managed. This is addressed in detail in para 366 to 376 and Table 9 of the Statutory Assessment.

- 12.36 I do not agree with the APRP submission that PC81 will encourage ad hoc development that is contrary to the provisions of Chapter 3 Land Use and Development Strategy of the Operative Kaipara District Plan. The issue of ad hoc development is also addressed within the Northland Regional Policy Statement. This is discussed in para 308 and 273 of the Statutory Assessment. As noted above, in my opinion the TDA is consistent with the Dargaville Spatial Plan, acknowledging that it includes additional urban land uses that have been designed to ensure a well-functioning urban development. Therefore, I do not consider the TDA will result in ad hoc development.
- 12.37 A detailed assessment against the objectives of Chapter 3 of the District Plan was provided as a response to item 5.1 of the clause 23 of Schedule 1 Request for Information (**RFI**) from Council (dated 16 March 2022). Based on this RFI assessment and the assessment provided in the Statutory Assessment (paragraphs identified in the RFI response), I consider that PC81 is not contrary to Chapter 3 of the Operative Kaipara District Plan.
- 12.38 Regarding submission points that PC81 is not consistent with the Regional Policy Statement, in that it will sterilise productive and industrial land and will not maximise the benefits and efficient use of existing infrastructure, this is addressed in para 267 - 270 in the Statutory Assessment.
- 12.39 The TDA provisions and layout have ensured that the potential for sterilisation through reverse sensitivity effects is addressed both internally between LIA and GRA, and between NCA and GRA, and also externally

with the surrounding rural land users (as discussed above). I consider that these measures will ensure there is no sterilisation of productive land through reverse sensitivity.

- 12.40 The Statutory Assessment (para 263-264) also considered RPS objective 3.6 where sterilisation is linked to reverse sensitivity but only for regionally significant minerals and regionally significant infrastructure. Therefore, in my opinion this objective is not applicable to the Plan Change site.
- 12.41 Submitters have contended that the TDA will in effect sterilise the area for proposed Heavy Industrial re-zoning before it has been zoned by the upcoming District Plan review. The Dargaville Spatial Plan identifies Industrial (light and heavy) land use in the Awakino Point area including part of the site. I note that LIA is positioned generally within the area identified in the Spatial Plan for Industry. (The Exposure Draft Kaipara District Plan identifies Heavy Industrial land use in the Awakino Point area including the entire site. I note that LIA is positioned the closest to the remainder of the area identified in the Exposure Draft Kaipara District Plan for Heavy Industry).
- 12.42 The National Planning Standards provide for Light Industrial and Heavy Industrial but also General Industrial zones. I consider light and heavy industries to be reasonably compatible land uses, should Heavy Industrial zoning in the Awakino Point area be brought forward into the Proposed District Plan. In addition, there will be SH14 providing a degree of separation (approximately 20m legal width) between LIA and Industrial zoning to the west.
- 12.43 Regarding maximising the benefits and efficient use of existing infrastructure, the site is currently serviced by reticulated water, however wastewater reticulation is required to be extended to service the site. Mr de Wet's civil engineering evidence addresses this matter. Upgrades are also required to the local road and the intersection with SH14. Mr McKenzie's transportation engineering evidence addresses this matter. I do not consider that the extension of the wastewater service or the upgrade of the roading network will be an inefficient use of existing infrastructure, as the Spatial Plan identifies Dargaville to grow in this direction therefore these infrastructure extensions and upgrades will be required in any case for the future industrial zoning.

12.44 Submission points have raised concern that the costs and benefit analysis failed to address the costs involved with developing land for heavy industry for other uses, and the lack of capacity for industrial land this will create. I have addressed above that the Dargaville Spatial Plan identifies only part of the site for Industry. There are sufficient areas identified for industrial use in the Dargaville Spatial Plan, with the area that LIA covers being approximately within the same area on the site as is identified in the Spatial Plan. Therefore, PC81 will not result in the loss of industrial land. PC81 is being considered before the Proposed District Plan is finalised and notified and the Council therefore can take the LIA into account when finalising mapping for the Proposed District Plan to ensure there is sufficient capacity for industrial growth into the future for Dargaville.

12.45 To conclude, I consider that the location of TDA is appropriate, and this location is consistent with the higher order planning documents due to:

- the existing transportation linkage provided by State Highway 14;
- the shared path proposed which will provide an active transportation option between TDA and town;
- the TDA has been designed to be a well-functioning urban environment;
- potential effects from reverse sensitivity both internally and externally with the surrounding environment has been mitigated;
- the growth of Dargaville towards (and including) the site identified in the Spatial Plan; and
- the upgrade and extension of infrastructure required to service the TDA is also required for the growth identified in the Spatial Plan.

#### **Complement not Compete with Dargaville**

12.46 A concern is raised by some submitters that there is a lack of amenities within the TDA for the number of people proposed to be housed there, for example, the lack of green space and a lack of sports facilities. That because of the lack of public transport to access the existing sports fields in Dargaville, this will limit sporting activities by the TDA residents, and because of the lack of green spaces, this will limit active lifestyles by the TDA residents. From an urban design perspective this matter is

addressed by Ms Dale in her evidence. From a planning perspective, I respond as follows.

12.47 An overarching design theme for the Plan Change has been to ensure that the TDA complements Dargaville, not competes with it. This has guided the design decisions on the size and type of services and facilities available at the Neighbourhood Centre Area, and the size and type of reserves in the Open Space Areas.

12.48 The 'complement' approach is articulated in the following TDA policies:

*TDA.1.2.7 Provide for commercial activities of a scale that supports the day to day needs of residents and workers, and complement, not compete with, Dargaville.*

*TDA.1.2.5 Provide for community facilities and services that support the Hauora (wellbeing) of the neighbourhood.*

*TDA.1.2.8 Enable the use of open spaces that responds to the needs of the local neighbourhood, workers and visitors, and achieve high quality stormwater management*

12.49 This overarching design principle when applied to the provision of parks and open spaces resulted in design decisions for the TDA to have four different Open Space Areas (OSA): Hillside OSA; Hauora OSA, Neighbourhood OSA; and Blue Green OSA. The Hauora OSA will be co-located with the Neighbourhood Centre Area centrally on the site, providing good linkages between them, and within easy walking distance for the future residents. Refer to Policy TDA.1.2(6) – *Co-locate the Neighbourhood Centre Area and Hauora Open Space Area at the heart of the neighbourhood.*

12.50 These four OSA are focused on catering for the local neighbourhood needs, and not competing with parks, reserve or sports facilities already provided for in Dargaville. For example, sports playing fields have not been provided within the Plan Change site as these are provided within Sportsville (Memorial Park and Rugby Park). Refer para 99-106 of the Statutory Assessment.

12.51 Community consultation on the provision of parks and reserves was also undertaken during the research and investigation phase. This community

input also helped to inform the design approach for the appropriate delivery of parks and reserves within TDA.

- 12.52 Outdoor sports type facilities could be established on the Neighbourhood OSA and Hauora OSA, for example basketball or netball half court or fitness circuit. The TDA provisions for Open Space Areas provide for this outcome, refer TDA-OSA-R8 Outdoor Playground Equipment. I note that outdoor playground equipment is precluded from the Hillside OSA (refer TDA-OSA-R8(1)(a)). This is because it is considered that playgrounds on a slope are not appropriate, and the landscape and visual assessment identified a wide viewing audience on this elevated area of the site.
- 12.53 Consistent with the 'complement not compete' design approach, establishing an indoor sports facility would be a Non-Complying activity, refer to TDA-OSA-R14 Community Facilities. The definition of 'Community Facility' includes 'Recreational Facilities', refer to the Development Area Definitions Nesting Table.
- 12.54 To conclude, I am of the opinion that TDA achieves the right balance by providing services and amenities for the local residents and workers while not competing with Dargaville.

#### **National Policy Statement on Urban Development**

- 12.55 Waka Kotahi note that Policy 1 of the National Policy Statement on Urban Development 2020 (**NPS UD**) emphasises the need to coordinate land use planning with infrastructure provisions, noting that planning decision contribute to a well-functioning urban environment that as a minimum have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport.
- 12.56 PC81 has been designed to be consistent with NPS UD, providing integration of housing and local amenities with open spaces, and active transport access both within the site and access to town for jobs and wider services. Ms Dale's evidence addresses this further.
- 12.57 Examples of how this integration of housing and local amenities with open spaces and active transport is achieved in the TDA are as follows:

- (a) Policy TDA.1.2(2) *Use Hauora (community wellbeing) outcomes and Urban Design principles to achieve a well-functioning and liveable urban environment.*
- (b) Policy TDA.1.2(6) *Co-locate the Neighbourhood Centre Area and Hauora Open Space Area at the heart of the neighbourhood.*
- (c) Policy TDA.1.2(9) *Encourage compact residential density outcomes in proximity to the facilities and services in the Neighbourhood Centre Area.*
- (d) Land Use (entire site) Standard TDA-LU-S3 Hauora Hub: requires a Comprehensive Development Plan before any activity is established in GRA or Hauora Hub, ensuring there is integration and connectivity in the spatial layout between the Neighbourhood Centre Area and the Hauora Open Space Area.
- (e) Land Use (entire site) Standard TDA-LU-S4 Transport: requires an Access Plan is developed that ensures a slow street or pedestrian connection is provided between LIA and GRA, thus providing for linkage between work and home.
- (f) Land Use (entire site) Standard TDA-LU-S4 Transport also requires a pedestrian and cycle link between the site and Dargaville, thus providing for an active transportation option.

12.58 Another example of how the TDA integrates housing and local amenities with open spaces and active transport is the over-arching philosophy of Hauora (community wellbeing) for the whole TDA. Hauora outcomes have been incorporated into the TDA design and provisions through mechanisms such as:

- (a) walkability within the TDA and shared path linkage to Dargaville;
- (b) community services in the NCA (refer TDA-NCA-R10);
- (c) community gardens in the OSA (refer TDA-OSA-R9);
- (d) co-location of housing and NCA (refer Policy TDA.1.2(9), standard TDA-GRA-S10 and Information Requirement GRA-REQ1);

- (e) housing typology flexibility including papakainga style living and retirement village with shared facilities, amenities or services (refer TDA-GRA-R16 and R17); and
- (f) intergenerational living enabled e.g. minor residential unit in LLRA (refer TDA-LLRA-R4).

### **Loss of Productive Land**

- 12.59 The issue of the loss of productive land was raised by a number of submitters. A site assessment of highly productive land is being undertaken and I will provide supplementary evidence addressing the applicability of the National Policy Statement for Highly Productive Land 2022 to PPC81 once that site assessment is complete.

### **Emissions Reduction Plan**

- 12.60 The Hearing Commissioners have requested comment on the applicability of the Emissions Reduction Plan 2022 to PC81. This matter is addressed in the opening legal submissions for the Applicant.
- 12.61 I note that the Plan Change delivers provisions to ensure safe and efficient walking and cycling networks are established within the development site and that they connect to the proposed pedestrian and cycle link to Dargaville. I also note that there is cross over in outcomes between the Emissions Reduction Plan and the NPS Urban Development, which is addressed in the section above. For example, walkability and Hauora (community wellbeing) outcomes.
- 12.62 I also note that amendments to the provisions can achieve the outcomes of delivery of secure and easy to access cycle parking within both the residential and light industrial development areas, and delivery of electric vehicle charging spaces and infrastructure to support and encourage the use of electric vehicle use.

### **Trifecta Development Area Chapter**

- 12.63 My following evidence addresses submission points that have sought changes to the TDA Chapter. For a brief overview of the influences to the provisions, please refer to para 12.6 of my evidence. It is also explained in detail in the Statutory Assessment (para 179).

**(a) Transportation**

- 12.64 Submission points relating to transportation are covered comprehensively in Mr McKenzie's evidence. I will address submission point 12.9 from the Awakino Point Rate Payers regarding the clarity on the timing for the upgrade of the State Highway-Local Road intersection, and timing for when the shared path will be established between the site and Dargaville.
- 12.65 The Land Use and Subdivision provisions that apply to the entire Development Area address this matter. The intersection upgrade is to be completed prior to the establishment of any activity (except farming) in the Light Industrial Area (LIA), refer TDA-LU-S4(1)(a) and TDA-SUB-S10(3). The intersection upgrade and a pedestrian and cycle link is to be completed prior to the occupation of any residential unit in the General Residential Area (GRA), refer TDA-LU-S4(2)(a) and (b), and TDA-SUB-S10(4).

**(b) Signage**

- 12.66 Waka Kotahi considers that the signage rules in the Trifecta Development Area should refer to the Kaipara District Plan Rule 14.10.24 Signage (including signs on and adjacent to roads) rather than provide an additional rule for this area only.
- 12.67 Waka Kotahi submit that standards associated with signage should be consistent with the Kaipara District Plan and guidance provided in the NZTA Traffic Control Devices Manual. That if standards as notified are retained, a matter of discretion requiring Waka Kotahi approval should be added.
- 12.68 Waka Kotahi request amendments to TDA-SIGN-S1 to ensure Waka Kotahi approval is sought for any sign visible from the SH. This includes where a sign is proposed to be located in a road reserve adjoining the SH network or is visible from the SH network the approval of the Waka Kotahi is also required. That an additional Matter of Discretion is added - Whether the sign is visible from the SH and, if so, Waka Kotahi approval has been obtained.
- 12.69 Waka Kotahi seeks district plan provisions to ensure that all third-party signs are appropriately designed and located to provide for the safe operation of the land transport system. Waka Kotahi requests an

amendment to TDA-SIGN-S4 to require that approval is sought from Waka Kotahi for any sign visible from the SH.

12.70 Waka Kotahi request that the activity status for an illuminated sign that is visible beyond the site boundary is more stringent. Waka Kotahi requests a change from Discretionary to Non-Complying status for TDA-SIGN-S9 Illuminated Sign (1).

12.71 Waka Kotahi request that the activity status for an illuminated sign that is visible beyond the site boundary for sites within the Light Industrial Area is more stringent. Illuminated signs are not supported when visible from the SH corridor in high-speed environments. Waka Kotahi requests a change from Discretionary to Non-Complying status for TDA-SIGN-S9 Illuminated Sign (2).

12.72 The TDA signs provisions have been drafted so that they are National Planning Standards compliant. The Kaipara District Plan is currently under review. However, I accept that the TDA signs provision could be removed, and reference made to the Operative District Plan provisions for signs. I consider this an efficient approach that will aid the integration of the TDA into the District Plan.

12.73 I suggest the following District Plan signs rules apply to the different Development Areas:

- Rural zone Rule 12.10.24 applies to Large Lot Residential Area and Open Space Area
- Residential zone Rule 13.10.24 applies to General Residential Area
- Business zone Rule 14.10.24 applies to Neighbourhood Centre Area and Light Industrial Area

**(c) Precinct Plan**

12.74 Waka Kotahi have submitted that a Precinct Plan should be appended to the Development Area chapter that includes the location of the pedestrian and cycle link and a cross section of the pedestrian and cycle link design, and that this appendix should be linked to the provisions of the chapter to make implementation of the transport infrastructure clearer.

12.75 I do not consider a Precinct Plan is necessary to aid the implementation of the TDA provisions. A Precinct Plan will unnecessarily restrict the implementation of the Development Area. The TDA provisions deliver the right balance between certainty and flexibility in my opinion. This higher level of implementation detail will be determined through the subsequent subdivision and land use resource consent applications and conditions of consent. Mr McKenzie has provided a Concept Plan for the shared path, establishing that an alignment along the state highway corridor is feasible. The level of detail a Precinct Plan will contain is not warranted for this Plan Change in my opinion.

**(d) Lighting**

12.76 Waka Kotahi have submitted that light spill from the Light Industrial Area onto SH14 corridor needs to be considered and appropriately mitigated.

12.77 The TDA Lighting provisions were modelled off the recently operative Whangarei District Plan Urban and Services Plan Changes which are National Planning Standards compliant. The TDA Lighting section addresses light spill by TDA-LIGHT-S1 Artificial Lighting, sub-clause (1) and (4)(a):

*(1) The artificial lighting is shielded or a suitable luminaire optic deployed, so that light emitted by the luminaire is projected below a horizontal plane running through the lowest point on the fixture.*

*(4) The added illuminance onto any other site or a road reserve, measured at the boundary, does not exceed the following limits:*

*a. Artificial lighting measured at the receiving allotment boundary with a road reserve – 15 Lux.*

12.78 I do not agree with this submission point as light spill is already addressed in the provisions. TDA-LIGHT-S1(1) addresses light spill "so that light emitted by the luminaire is projected below a horizontal plane running through the lowest point on the fixture", and "The added illuminance onto any other site or a road reserve, measured at the boundary, does not exceed the following limits: ...". This provision will ensure that lights face down and therefore light spill onto SH14 is restricted ensuring traffic safety is maintained.

12.79 Waka Kotahi requests that as lighting may be located alongside the SH14 corridor, that TRA-LIGHT-S5-Subdivision be amended to include Waka Kotahi as a roading authority. I agree with this submission point and proposed addition to this standard, as it will result in an efficient and effective outcome.

**(e) Add Additional Requirements Under Separate Legislation and Add a Policy**

12.80 Waka Kotahi seeks that notes are added to the front end of the Trifecta Development Area Chapter to reinforce any additional requirements under separate legislation from the Resource Management Act 1991, specifically Government Roding Powers Act 1989.

12.81 The Operative District Plan has other applicable legislation listed in Chapter 1 Structure and Tools of the Plan (refer Figure 1-1). The TDA will be part of the Kaipara District Plan therefore, Chapter 1 will equally apply to it. Based on this, I do not consider it warranted to add a list of other legislation to the TDA chapter.

12.82 Waka Kotahi seek an additional policy to be included to support integrated planning and the provision of necessary transport infrastructure, specifically related to multi-modal connections to the Dargaville town centre and the intersection of Awakino Point North Road and SH14.

12.83 I support this submission point and consider an additional policy will deliver an effective outcome.

**(e) Definitions**

12.84 Waka Kotahi note that all definitions should be consistent with the Kaipara District Plan. The TDA Definitions are consistent with the National Planning Standards, while the Operative Kaipara District Plan definitions are not. I consider that it is a more effective and efficient approach for the TDA Definitions to be consistent with the Planning Standards, and that takes precedence over consistency with the District Plan. Therefore, I do not agree with this submission point.

**(f) Fire Fighting Water and Emergencies**

12.85 Fire and Emergency New Zealand (FENZ) submit that SNZ 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice

should be added as a reference to matters of discretion for subdivision and land use, and that onsite storage of water by residential dwellings in LLRA should be designed in accordance with their Code of Practice. For un-serviced sites, the Water Supply Code of Practice requires 45,000 litres of water stored onsite per dwelling dedicated for firefighting purposes.

- 12.86 I do not support a requirement for this volume of water to be stored per dwelling in the LLRA. For the LLRA, onsite storage of water dedicated for firefighting purposes is supported, however I consider that 45,000 litre of stored water is not an appropriate amount. As stated in the s42A Report (para 314-346), Plan Change 4 Fire Safety Rules has addressed this issue resulting in the Rural zone land use Rule 12.10.26 Fire Safety of the Operative Kaipara District Plan. This rule includes a note with the New Zealand Fire Service recommendation that buildings install a sprinkler system or that sufficient water supply is provided if a sprinkler system is not installed. Through successive resource consents, 'sufficient water supply' has been determined by Kaipara District Council Resource Consents Team in consultation with the local FENZ representatives to be 10,000 litres.
- 12.87 The Code is not referenced or noted in Rule 12.10.26. The text for this rule was determined through Plan Change 4 to the Operative Kaipara District Plan. Based on the approach agreed with FENZ through Plan Change 4, I support 10,000 litres of dedicated firefighting water supply to be a standard for residential dwellings in LLRA.
- 12.88 The remainder of TDA will be serviced by reticulated water and the associated fire hydrants, therefore I consider adding the Code as a matter of discretion for subdivision and land use is unnecessary.
- 12.89 I consider that this is the most efficient and effective approach because the right balance has been achieved between ensuring homes have sufficient water stored in case of a fire, while not having substantial areas on each property occupied by water tanks.
- 12.90 FENZ request the following changes to TDA provisions, which I support because they add clarity and certainty:

- i. an addition to Policy TDA.1.2.12 to reference emergency servicing needs.
- ii. an addition of a reference in TDA-SUB-S1(1) to TDA-SUB-R9 Transport and Three Waters.
- iii. an addition to TDA-SUB-S10 to require 'every allotment provides for emergency service response access'.
- iv. an addition to TDA-SUB-S13 Matters of Control and Discretion and TDA-LU-S4 Transport to allow for emergency service responses to the provision of infrastructure or access.

**(g) Education Facilities**

- 12.91 The Ministry of Education (the **Ministry**) seek that the TDA provisions are amended to enable educational facilities to be established to service the growth and urban expansion of Dargaville that will result from PC81. The Ministry seek a new provision for an Education Facility to establish as a Restricted Discretionary activity in the three Areas of Large Lot Residential, General Residential and Neighbourhood Centre.
- 12.92 The Definition section for the TDA provides for Educational Facility within the nesting table for Community Facility. In the Neighbourhood Centre Area, a Community Facility is provided for as a Permitted Activity (refer TDA-NCA-R10). In the General Residential Area and Large Lot Residential Area, a Community Facility is a non-complying activity (refer TDA-GRA-R19 and TDA-LLRA-R18).
- 12.93 I note that submission points 7.4 and 7.5 from the Ministry does not reach this conclusion that Educational Facility is nested within Community Facility within the Definitions section of TDA chapter, while submission point 7.9 seeks Educational Facility to be an independent activity within the Definitions section of TDA chapter. To that end, they seek amendments to TDA.1.1 Objective 3 and TDA.1.2 Policy 5 to include educational facility because they do not consider it is included within the definition of Community Facility. This is not the case, and my opinion is that amendments to the Definitions, Objective and Policy are not required.
- 12.94 For a school to establish as a permitted activity in the NCA, I consider that the limiting factor would be NCA-S11 Gross Floor Area of no more than

300m<sup>2</sup>. This gross floor area threshold was set with an early childhood centre in mind, rather than being enabling for a primary school to establish. The reason for this approach was because of the overarching design principle of complementing not competing with Dargaville. The Ministry was contacted at time of drafting the TDA provisions and confirmed that there is sufficient capacity in all three existing Primary Schools and High School to accommodate the urban growth enabled through TDA.

- 12.95 If the Ministry's submission were to be accepted by the Commissioners, in my opinion the provisions for GRA could be amended to provide for educational facilities if the additional traffic generated by this activity are addressed. That is, if the Ministry funds the infrastructure upgrades required as a result of the additional traffic generated by the school activity. The transportation implications of enabling a school to establish in TDA is considered by Mr McKenzie in his evidence.
- 12.96 I do not support an Educational Facility being provided for in the Large Lot Residential Area as this is a relatively small Area located in the northern corner of the TDA site. In comparison, the General Residential Area is relatively flat and an Educational Facility, if provided for here, would be centrally located within the TDA site, aiding the walkability and connectivity.
- 12.97 In addition, the Ministry have another process available to them under the RMA. Regardless of the zoning of a site, as a Requiring Authority the Ministry can use the Designation process to secure a site for educational purposes. I consider this a better RMA process for removing barriers for the delivery, security and ongoing operation of an Educational Facility.
- 12.98 The s42A Report recommends that the Ministry's submission points are accepted in part, with regard to a separate definition for education facilities and the need for specific enabling provisions. As I state above, I do not consider a separate definition is warranted, and in my opinion enabling provisions should only be included if the infrastructure upgrades required to address the effects of this activity are borne by the Ministry.

#### **Historical Land Transactions of the Racecourse Site**

- 12.99 Te Kuihi, Te Houhanga a Rongo Marae and the Parore whanau have raised the matter of the original sale of the site. I can confirm that a search

was undertaken for the historical land transactions of this site as part of the first Cultural Impact Assessment (**CIA**), Appendix 11A to the lodged Plan Change request.

12.100 The historical Title research that was undertaken by Te Runanga o Ngati Whatua is addressed at section 5.2.2 of the first Cultural Impact Assessment, with the CIA concluding at section 6.2 that issues of ownership should be pursued as a separate process by Hapū descendants under the Waitangi Tribunal Treaty Claim process.

#### **Iwi Consultation**

12.101 Te Kuihi, Te Houhanga a Rongo Marae and Te Whanau Parore have stated that they were inadequately consulted with at the beginning of the submission process.

12.102 As noted above, two Cultural Impact Assessments were completed regarding the Plan Change, these are Appendices 11A and 11B to the Plan Change request. My evidence provides information on the methodology used to engage with iwi for the first CIA (Appendix 11A), as that was initiated by Te Runanga o Ngati Whatua on behalf of the Tripartite Group. The second CIA (Appendix 11B) was in response to the request for information (clause 23 of Schedule 1) from Council and was undertaken by Te Roroa. I am not able to comment on their method of engaging and consulting.

12.103 A description of the methods of engagement and background to writing of the first CIA was provided in the response to item 6.1 of the Request for Information from Council. In summary, the engagement process for the CIA started by identifying Mana Whenua - Te Kuihi, Te Roroa, Te Uri o Hau and Te Parawhau. A Kaumata Roopu was established, being a representative group of Mana Whenua. Two initial hui were held with the Kaumata, followed by four hui with the Kaumata Roopu regarding the Racecourse proposal and cultural values. This process delivered the CIA, including recommended mitigation measures.

12.104 Post delivery of the CIA, the Tripartite Group considered the recommended mitigation measures, and responded, contained in Appendix 11 to the Plan Change request. The CIA mitigation measures were either incorporated into the Plan Change provisions or noted in the Plan Change because the delivery mechanism sits outside of the Plan

Change process, for example a subdivision consent matter or a site development matter. The intent is for discussion to be ongoing with Tangata Whenua through the Plan Change process and through the subdivision and development phases of this project.

### **Three Waters Infrastructure**

12.105 A submitter has raised the concern that the required infrastructure upgrades will result in increased rates. (refer to submission point 17.6). The standard approach with any subdivision or development of land is for the developer to pay for the upgrade of infrastructure directly associated with servicing the growth enabled by the resource consent. In broad terms, this is a User Pays approach.

12.106 The funding of infrastructure extensions or upgrades can be managed through a variety of user pays methods Council has, including development contributions, financial contributions and targeted rates. Asset upgrades can also be undertaken by the developer through a Development Agreement with Council. As described in the Development Contribution Policy 2020, developers are able to build items of public infrastructure, that Council would normally provide itself but is not yet ready to. To enable a development to go ahead, Council can enter into a Development Agreement with the developer about this public asset. The Policy notes that commitments can be made to offset development contributions or reimburse the developer directly once the infrastructure is built.

12.107 The rezoning of the site would enable development but would still require that any future development go through the scrutiny of a subdivision or land use resource consent process. Any outcome from this process would need to comply with the Council's Environmental Engineering Standards or provide a reasonable alternative to achieve the same outcome.

12.108 Recent condition and capacity assessments of Council's water and wastewater treatment plants and reticulation for Dargaville has identified some existing issues with these public assets. This is discussed in detail in Mr de Wet's evidence covering civil engineering matters.

12.109 Set in that context, the TDA developer can be expected to pay for upgrades of infrastructure directly associated with the growth enable by

the TDA, and not pay for upgrades required to service the existing users of these services, nor pay for upgrades required for growth enabled through other plan change requests or growth provided for through the Proposed District Plan.

### 13. COUNCIL OFFICER'S REPORT

13.1 I respond to aspects of the Council Officer's report below that are relevant to my planning expertise.

#### **s32(1)(b) Other Reasonably Practicable Options and Efficiency and Effectiveness**

13.2 The s42A report (para 79) considers that two additional options should have been evaluated in the s32(1)(b) assessment: the whole site industrial; and the whole site residential. I have provided this additional evaluation in **Appendix 1** to my evidence. I have added these two additional options to Table 6 from the Statutory Assessment, in order to give context for the two options.

13.3 I note that the reporting planner interprets the coverage of the Industrial area in the Dargaville Spatial Plan to include the whole of the Racecourse site. **Figure 3** below from the Spatial Plan shows Neighbourhood 7 Awakino Point occupying the western half (approx.) of the site only.



**Figure 3:** Dargaville Spatial Plan – Neighbourhoods.

**National Policy Statement: Highly Productive Land (NPS HPL)**

- 13.4 As noted in my evidence above (para 12.59), a site assessment of highly productive land is being undertaken, with an Addendum to my planning evidence scheduled to be provided by Friday 22 March. The site assessment will determine the applicability of the NPS HPL to the site.

**National Policy Statement: Freshwater Management (NPS FM)**

- 13.5 An ecological assessment is currently being undertaken of the site to determine if either 'inland natural wetlands' or waterways are present on the site. An Addendum to my planning evidence to be provided on Friday 22 March 2023, will address the applicability of NPS FM, based on the findings of the ecological assessment.

**Trifecta Development Area Provisions**

- 13.6 As noted above in my evidence (para 12.63), and as outlined in the Statutory Assessment (para 179), the drafting of the TDA provisions was informed from a review of urban zones and provisions from other Plans when they were considered comparable or provided a good reference point, for example:

- Whangarei District Plan – neighbouring local authority whose urban provisions have recently been 'tested' through the full RMA plan change process (Urban and Services Plan Changes operative in part 2021), which included significant input to the provisions from entities such as Waka Kotahi and Kainga Ora. The urban provisions have been drafted under the National Planning Standards and, following appeals to the Environment Court, are now operative.
- Auckland Unitary Plan – neighbouring unitary authority with a selection of urban zones and provisions.
- Kaipara District Plan – used as a reference point, while being mindful that it is in its 9th year and currently under review.
- Porirua Proposed District Plan – providing another perspective on urban provisions, albeit not yet 'tested' through the RMA process. The provisions have been drafted under the National Planning Standards.

- Marsden City Private Plan Change to the Whangarei District Plan – a recent Plan Change modifying a new neighbourhood with a mix of land uses in a ‘Brownfield’ setting.
- Port Nikau Development Area in the Whangarei District Plan – a Development Area creating a new neighbourhood with a mix of land uses in a ‘Brownfield’ setting.
- Mangawhai Central Private Plan Change to the Kaipara District Plan - a recent Plan Change modifying a new neighbourhood with a mix of land uses in a ‘Greenfield’ setting.

**(a) Development Area**

- 13.7 Council’s reporting planner questions the appropriateness of choosing a Development Area ‘as the actual base zone will be a Special Purpose Zone’ (refer para 35-38 of the s42A Report).
- 13.8 All options under the National Planning Standards (**NPS**) were considered during the research phase for the plan change. The investigation into options under the NPS is articulated in para 253-256 in the Statutory Assessment. NPS options considered were Precinct, Special Purpose Zone, Settlement Zone, Mixed Use Zone, and Development Area.
- 13.9 Regarding Special Purpose Zone, it can only be applied (other than as provided for in Table 13 of NPS) if three thresholds are passed:
- (a) are significant to the district, region or country;*
  - (b) are impractical to be managed through another zone;*
  - (c) are impractical to be managed through a combination of spatial layers.*
- 13.10 The Statutory Assessment acknowledged that the Plan Change development could be a Special Purpose Zone combined with underlying Precincts for the different land uses, e.g. residential, light industrial. However, it does not pass the threshold tests. Regarding (a), while the Plan Change will be significant to the wider Dargaville area, it was not considered to be significant to the wider Kaipara District, Northland Region or New Zealand (refer to the Economic Impact Assessment (Appendix 6 to Plan Change request), Social Impact Assessment (Appendix 9 to Plan Change request), and Cultural Impact Assessment

(Appendix 11 to Plan Change request). By way of comparison, Marsden City Plan Change 150 to the Whangarei District Plan was not considered 'significant' to Whangarei District under this test. Regarding (c), I do consider it practical to manage the Plan Change through spatial layers - Development Areas.

- 13.11 A Development Area was considered appropriate because: this approach allows flexibility with the spatial layout and extent of different land uses, which suits how the Neighbourhood Centre and connected Hauora Open Space will be realised (Hauora Hub); it is a good approach for Greenfield sites, where there are no or minimal existing land uses, built development, roading, etc; and the Development Area has its own chapter, which helps future proof the Plan Change for transition into the Proposed Kaipara District Plan.
- 13.12 In para 38, the s42A Report notes that a 'Development Area' under the NPS provides for an area to be spatially identified and managed through a concept plan, structure plan, master plan, etc. Then when the development is complete, the development area spatial layer is generally removed from the plan, either through a trigger in the development area provisions or as part of a later plan change. The reporting officer notes that no such trigger is included in the TDA provisions. I note that the Planning Standards refer to the development area "generally" being removed from the Plan but do not require that it be removed. For PC81 the development area chapter is proposed to remain in the Plan and contains objectives, policies and rules that would apply to ongoing subdivision and land use activities.

***(b) Cascading Objectives, Policies, Rules and Standards***

- 13.13 The s42A report considers that PC81 does not follow a formative cascade with clear linkages between the objectives, policies and consequential rules (para 80 and 81). I do not agree with this general comment. I consider that there are clear linkages between the objectives and policies to the rules and standards. Where specific examples are given in the s42A Report, I have addressed in my evidence, for example Hauora Hub, Hauora in the objectives or providing for raw water constraints (see below). I welcome other specific examples from the reporting officer so that I have the opportunity to address.

**(c) Hauora Hub and Comprehensive Development Plan**

13.14 The s42A report questions the role the Comprehensive Development Plan (CDP) will play in implementing the Hauora Hub (refer para 46 and 47). The reporting officer considers the role of the CDP is to provide more specificity for what happens within the Hub. I agree and consider that specificity will be delivered by the CDP because it will determine the spatial extent and connectivity between the three Areas within the Hauora Hub. That is, the location and connectivity between the NCA and the Hauora OSA, and therefore the spatial extent of GRA which will occupy the remainder of the Hauora Hub. Further explanation is provided in paragraphs 77-81 in the Statutory Assessment for the Plan Change request.

13.15 The lack of separate Hauora (community wellbeing) objectives in relation to GRA or OSA is identified in paragraph 47 of the s42A Report. I do not consider it is necessary to have separate objectives for GRA and OSA that specify the word 'Hauora' or 'Community Wellbeing' to ensure the concept is delivered. The concept of Hauora is woven into the following objectives as they will deliver wellbeing to the community:

1. *Residential living for all ages and stages.*
3. *Community facilities and services available.*
4. *Commercial activities support the day to day needs of residents and workers.*
5. *Open spaces support residents, workers, visitors, and a healthy environment.*
6. *Hauora (community wellbeing) outcomes guide development.*

13.16 The workability of the Comprehensive Development Plan in the provisions is questioned in paragraph 55 of the s42A Report. A CDP is required to be undertaken by resource consent before the GRA is developed, with triggers for this outcome in the Land Use rule TDA-LU-R3 Any Activity and Land Use standard TDA-LU-S3 Hauora Hub. As explained above, the CDP will fix the spatial extent of NCA and the connecting Hauora OSA, with the remainder of the Hauora Hub area occupied with GRA. Once this

is determined, then the applicable rules in NCA, OSA or GRA will apply to what was the Hauora Hub.

**(d) Staging**

13.17 The reporting officer comments that staging is not provided for in the TDA provisions (para 39). I direct the reporting officer to the Subdivision Chapter that applies to the entire Development Area, rule TDA-SUB-R1 Subdivision into Super Lots and standard TDA-SUB-S1 Subdivision into Super Lots, in particular Note 1:

*Notes:*

1. *The purpose of Super Lots is to facilitate staging of development.*

**(e) Water Storage**

13.18 The s42A report questions how water storage is provided for in the provisions (para 161). LLRA will not be provided with reticulated three water infrastructure therefore onsite collection and storage of water is expected. This is consistent with all rural areas of Kaipara District. There is a clarification note to rule TDA-LLRA-R1 Minor Structures confirming that 'water tanks' not exceeding 35,000L are a Minor Structure and therefore do not need to comply with the rules and standards that apply to Major Structures, e.g. height in relation to boundary, setbacks, coverage.

13.19 In GRA there is not a standalone rule or standard providing for onsite water storage. Instead, the provisions have taken an enabling approach by clarifying that 'water tanks' are a Minor Structure in standard TDA-GRA-R1 Minor Structures. This is similar to LLRA. I agree that more 'encouragement' could be provided in the GRA provisions, which I will include, as appropriate, in the amended TDA provisions to be provided on 22 March 2023.

13.20 Regarding the reporting officer's concern (para 161 and 312) about the need to address in the provisions the potential constraints on raw water supply to Council's Water Treatment Plant, the raw water supply is covered in Mr de Wets evidence. Regarding the need for the TDA provisions to provide for this, GRA provisions provide for this assessment when the density is exceeded. Refer to TDA-GRA-S10 Residential Density matter of discretion 5 which requires consideration of the 'capacity

and availability of infrastructure'. The subdivision provisions also address this. Refer to TDA-SUB-S11 Three Waters matter of discretion 2, and TDA-SUB-S13 Matters of Control and Discretion matter 6. However, I will consider this further when I am preparing the amended provisions.

***(f) Reverse Sensitivity and Compatibility***

13.21 I agree with the assessment and conclusion reached by the reporting officer regarding reverse sensitivity and compatibility. I have discussed this in detail in my evidence above.

***(g) Transportation***

13.22 For matters relating to transportation, I rely on the evidence from Mr McKenzie.

***(h) Water and Wastewater Infrastructure***

13.23 For matters relating to water and wastewater infrastructure, I rely on the evidence from Mr de Wet.

***(i) Stormwater Management***

13.24 For matters relating to stormwater management, I rely on the evidence from Mr de Wet.

***(j) Amended Trifecta Development Area Provisions***

13.25 Minor omissions or typos and clarity issues have been identified within the TDA chapter by the Applicant's expert evidence. In addition, there are amendments in response to matters raised in the s42A Report. I propose for these to be addressed by providing amended provisions on 22 March 2023 when I provide an Addendum to my planning evidence regarding NPS Highly Productive Land and NPS Freshwater Management.

**14. Conclusion**

14.1 Overall, after carefully considering the relevant statutory documents, the submissions and further submissions received and assessment undertaken in the s42A report, I support Plan Change 81 to rezone the Dargaville Racecourse site to a Development Area.

- 14.2 I consider that the objectives of Plan Change 81 are the most appropriate way to achieve the purpose of the RMA, and that the provisions are the most appropriate way to achieve these objectives.
- 14.3 While this is an enabling Plan Change, the development requires land use or subdivision consents, at which time the Comprehensive Development Plan, Access Plan, Stormwater Management Plan, conditions of consent and detailed design will occur.

**Venessa Anich**

10 March 2023

**Appendix 1: ADDITIONAL s32(1)(b) EVALUATION OF OPTIONS, IN RESPONSE TO THE s42A REPORT**

Table 6 from the Plan Change Statutory Assessment Report (para 358) with two additional options analysed, as identified in the s42A Report (para 79).

- Option 4 Whole site industrial
- Option 5 Whole site residential

The text in Table 6 for Options 1, 2 and 3 are shown in italics.

Table 6: Summary of Options Analysis for Theme 1: Land Use Options

<b>Benefits</b>	<b>Costs</b>	<b>Efficiency and Effectiveness</b>
<b><i>Option 1: Status quo – retain the Rural Zone</i></b>		
<p><u><i>Economic</i></u></p> <p><i>No development costs as continued rural use will not require provision of infrastructure, upgrade to local road or SH14 intersection, etc.</i></p> <p><i>No Plan Change costs to applicant.</i></p> <p><i>Lease arrangements for dairy grazing and kumara cropping continues.</i></p>	<p><u><i>Economic</i></u></p> <p><i>Economic Assessment (<b>Appendix 6</b>) has demonstrated that the current land uses deliver a limited return for the Racing Club.</i></p> <p><i>Residential and business growth not provided for. Homes and businesses move away from Dargaville.</i></p> <p><i>Cost of removing aged Race Club buildings, facilities etc.</i></p>	<p><i>This option results in an inefficient use of the Racecourse site, as it has limited value as rural land due to the high water table in winter.</i></p> <p><i>This is not an effective option as it does not provide for growth on a site that is close to town and flood free.</i></p> <p><i>This is an effective option for ensuring potential reverse sensitivity effects are not triggered, as there will be no industrial, residential or commercial land uses established.</i></p>
<p><u><i>Social</i></u></p> <p><i>Dargaville Pony Club continues to have use of portion of the site.</i></p>	<p><u><i>Social</i></u></p> <p><i>Demand for residential land is not provided, resulting in affordability issues from increased house prices and people moving away from Dargaville.</i></p>	
<p><u><i>Environmental</i></u></p> <p><i>None identified.</i></p>	<p><u><i>Environmental</i></u></p> <p><i>Modified rural environment remains.</i></p>	
<p><u><i>Cultural</i></u></p> <p><i>None identified.</i></p>	<p><u><i>Cultural</i></u></p> <p><i>Goal of providing homes and jobs for people not achieved.</i></p>	

Benefits	Costs	Efficiency and Effectiveness
	<i>Modified rural environment remains.</i>	
<b>Option 2: Rezone in accordance with the Dargaville Spatial Plan – Industrial &amp; Rural</b>		
<p><u>Economic</u></p> <p><i>Provides for Industrial zoned land to support business growth in Dargaville.</i></p> <p><i>Neighbouring dairy farm can continue to lease Race Club land.</i></p>	<p><u>Economic</u></p> <p><i>Not a large enough area zoned Industrial to make it economically viable to service with reticulated water and wastewater, nor to seal the local road or upgrade the intersection with SH14. Onsite servicing will result in less Industrial sites, and therefore be of less benefit to support growth of Dargaville businesses. Waka Kotahi are likely to still require SH14 intersection to be upgraded regardless of smaller re-zoning area.</i></p> <p><i>Portion of site left as Rural delivers limited economic return for the Racing Club due to diminished area.</i></p>	<p><i>This option is ineffective and inefficient as it is not a financially viable yield of Industrial zoned land to warrant the expense of infrastructure servicing and upgrades.</i></p> <p><i>If onsite servicing is used, then this will result in lower density, which is an inefficient use of land.</i></p> <p><i>The lack of residential land is ineffective as there is no provision for residential growth, given the bow wave of under supply over the life of the ODP.</i></p>
<p><u>Social</u></p> <p><i>Industrial business growth will have flow on positive effects through additional employment and other supporting activities, e.g. shops, supermarket, school, etc.</i></p>	<p><u>Social</u></p> <p><i>Small Industrial zoned land yield means less businesses are able to establish and reduced social benefits that flow from business generation.</i></p> <p><i>Dargaville Pony Club has to move from the site.</i></p>	
<p><u>Environmental</u></p> <p><i>Area re-zoned Industrial will provide for improved stormwater management.</i></p>	<p><u>Environmental</u></p> <p><i>Modified rural environment remains, plus modified Industrial environment.</i></p>	

Benefits	Costs	Efficiency and Effectiveness
<p><u>Cultural</u></p> <p>Goal of having jobs for people is provided for by the businesses that set up in the Industrial area.</p>	<p><u>Cultural</u></p> <p>Goal of having homes for people is not achieved.</p> <p>Modified rural environment remains, plus modified Industrial environment.</p>	
<p><b>Option 3: Rezone to a Development Area with a mix of residential, light industrial, neighbourhood centre and open space (preferred option)</b></p>		
<p><u>Economic</u></p> <p>Economic benefits from residential and business land available to support Dargaville's growth (refer Economic Impact Assessment <b>Appendix 6</b>).</p>	<p><u>Economic</u></p> <p>The costs of implementing the Plan Change are substantial, as the RMA system front loads the majority of costs, before a return can be realised when the up-zoned land is subdivided, serviced and ready for sale.</p> <p>Neighbouring dairy farm loses lease land.</p>	<p>This option is considered effective and efficient as it is a financially viable yield of residential and Light Industrial zoned land to warrant the expense of infrastructure servicing and upgrades.</p> <p>The need for business and residential land will be addressed in the short term, giving the District Plan time to catch up with the bow wave of undersupply.</p>
<p><u>Social</u></p> <p>Additional jobs, homes and community facilities available, with a variety of housing typologies providing for all ages and stages of the community.</p> <p>Walkability of the new urban area with accessible services, facilities and amenities.</p>	<p><u>Social</u></p> <p>Dargaville Pony Club has to move from the site.</p>	<p>With appropriate controls and mitigation measures on the residential and business land, the neighbouring rural properties including the dairy farm can continue to enjoy their lifestyle properties or operate as an efficient rural business. Compatible with future rezoning of additional adjacent Industrial land in the PDP.</p>
<p><u>Environmental</u></p> <p>Blue Green network improves the stormwater and spring water on the site and downstream of the site.</p> <p>Open Space Areas provide for positive environmental and ecological outcomes, e.g. re-vegetated in a variety of flora,</p>	<p><u>Environmental</u></p> <p>The site will change to a modified urban environment with a large portion covered in impervious surfaces.</p>	

Benefits	Costs	Efficiency and Effectiveness
<i>and increasing the local biodiversity.</i>		
<p><u>Cultural</u></p> <p>Goal of having homes and jobs for people is achieved.</p>	<p><u>Cultural</u></p> <p>The site will change to a modified urban environment with a large portion covered in impervious surfaces.</p>	
<b>Option 4: Rezone the whole site Industrial</b>		
<p><u>Economic</u></p> <p>Provides for Industrial zoned land to support business growth in Dargaville.</p> <p>Large enough area zoned Industrial to make it economically viable to service with reticulated water and wastewater, and to seal the local road and upgrade the intersection with SH14.</p>	<p><u>Economic</u></p> <p>Elevated north-eastern portion of site not conducive for industrial use, therefore would not provide an economic return.</p> <p>Neighbouring dairy farm loses lease land.</p>	<p>This is not an effective option as it does not provide for residential growth on a site that is close to town and flood free.</p> <p>The lack of residential land is ineffective as there is no provision for residential growth, given the bow wave of under supply over the life of the ODP.</p>
<p><u>Social</u></p> <p>Industrial business growth will have flow on positive effects through additional employment and other supporting activities, e.g. shops, supermarket, school, etc.</p>	<p><u>Social</u></p> <p>There will not be additional residential land available to provide homes for the people of Dargaville.</p> <p>Dargaville Pony Club has to move from the site.</p>	<p>Partly consistent with Spatial Plan as whole site zoned industrial but Spatial Plan only identifies part of the site.</p>
<p><u>Environmental</u></p> <p>Re-zoned area will provide for improved stormwater management.</p>	<p><u>Environmental</u></p> <p>Potential impacts on springs and stormwater management network from the nature of some industrial businesses.</p> <p>The site will change to a modified urban environment with a large portion covered in impervious surfaces.</p>	

<b>Benefits</b>	<b>Costs</b>	<b>Efficiency and Effectiveness</b>
<p><u>Cultural</u></p> <p>Goal of having jobs for people is provided for by the businesses that set up in the Industrial area.</p>	<p><u>Cultural</u></p> <p>Goal of having homes for people is not achieved.</p> <p>Potential impacts on springs and stormwater management network from industrial businesses.</p> <p>The site will change to a modified urban environment with a large portion covered in impervious surfaces.</p>	
<b>Option 5: Rezone the whole site Residential</b>		
<p><u>Economic</u></p> <p>Provides for Residential zoned land to support growth in Dargaville.</p> <p>Large enough area zoned Industrial to make it economically viable to service with reticulated water and wastewater, and to seal the local road and upgrade the intersection with SH14.</p>	<p><u>Economic</u></p> <p>Neighbouring dairy farm loses lease land.</p>	<p>This is not an effective option as it does not provide for business growth on a site that is close to town and flood free.</p> <p>This option is inconsistent with the Spatial Plan as no land within the site is zoned industrial.</p>
<p><u>Social</u></p> <p>Additional residential land available will have flow on positive social effects by providing homes for the people of Dargaville.</p>	<p><u>Social</u></p> <p>Lack of other supporting land uses, like open spaces, local shops or community facilities, leads to less community cohesion.</p> <p>There will not be additional industrial land available to provide for business growth and jobs for the people of Dargaville.</p> <p>It is not pleasant to live close to a busy road – SH14.</p> <p>Potential reverse sensitivity effects with the surrounding rural land uses.</p>	

<b>Benefits</b>	<b>Costs</b>	<b>Efficiency and Effectiveness</b>
	Dargaville Pony Club has to move from the site.	
<p><u>Environmental</u></p> <p>Re-zoned area will provide for improved stormwater management.</p>	<p><u>Environmental</u></p> <p>The site will change to a modified urban environment with a large portion covered in impervious surfaces.</p>	
<p><u>Cultural</u></p> <p>Additional residential land available will have flow on positive social effects by providing homes for the people of Dargaville.</p> <p>Goal of having homes for people is provided for by the additional residential land.</p>	<p><u>Cultural</u></p> <p>Lack of other supporting land uses, like open spaces, local shops or community facilities, leads to less community cohesion.</p> <p>Goal of having jobs for people may not be achieved.</p> <p>The site will change to a modified urban environment with a large portion covered in impervious surfaces.</p>	