



## Submission 12

### Form 5

Submission on notified proposal for policy statement or plan, change or variation

*Clause 6 of Schedule 1, Resource Management Act 1991*

#### Submitter details: *(please note that any fields with an asterisk (\*) are required fields and must be completed)*

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Please tick your preferred method of contact ( <i>please select only one</i> ):*		Correspondence to:*	
<input checked="" type="checkbox"/> Email <input type="checkbox"/> Postal		<input type="checkbox"/> Submitter <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Both	



## Submission on application:

### This is a submission on a private plan change

Please complete this form if you wish to make a submission to a current plan change that is open for submissions

Plan change number: **PPPC81**

Plan change name: **Dargaville Racecourse**

The purpose of this Private Plan Change is to provide for a viable and sustainable mix of land uses on the former Racecourse site that complements and supports the growth of Dargaville.

The key features of the proposal are:

- A variety of residential sites and housing typologies including a retirement village, larger lot residential, retirement style living, and papakāinga style living where shared facilities or amenities are provided for,
- An overarching philosophy of Hauora or community wellbeing, to ensure there is a strong heart to this neighbourhood, a well-functioning urban environment that provides accessible and vibrant community shared spaces, facilities, and services,
- A Neighbourhood Centre Area catering for the community's day-to-day needs within an easily walkable distance,
- A Light Industrial Area to provide for business activity growth, while compatibility is managed,
- Public Open Space Areas providing for informal recreation and Hauora community well-being enabling shared community food gardens and orchards,
- Walking and cycling, both within the Development Area and linking the site to Dargaville town,
- Encouraging sustainability and resilience through supporting onsite harvest and storage of rainwater, and supporting individual onsite solar power generation,
- Reticulated water and wastewater services, and
- Blue-green network to address the dual purpose of stormwater management and walking/cycling linkages.

The Private Plan Change consists of Objectives, Policies Rules, and Standards while the changes to the existing Rural zoned land are shown on the Zoning Map as a Development Area and consists of five different Areas as follows, along with their approximate sizes:

- General Residential Area (GRA) 23.67ha
- Large Lot Residential Area (LLRA) 3.44ha,
- Light Industrial Area (LIA) 9.53ha,
- Neighbourhood Centre Area (NCA) 0.28ha, and
- Open Space Area (OSA) 5.75ha.

Trade competition and adverse effects: (select one of the following options)\*

☐ I could ☒ I could not

Gain an advantage in trade competition through this submission.

If you ticked "I could" above, please answer this question by selecting one option below:

☐ I am ☐ I am not

directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

#### Note:

If you are a person who could gain an advantage in trade competition through making a submission on PPC81 you may only make a submission if you are directly affected by an effect of PPC81 that adversely affects the environment; and does not relate to trade competition of the effects of trade completion: Clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Would you like to present your submission in person at a hearing?

☒ Yes ☐ No

If others make a similar submission will you consider presenting a joint case with them at the hearing?

☒ Yes ☐ No



**Please complete a line for every submission point, adding as many additional lines as you need.**  
**NOTE:** This form is intended for brief submission only, if you wish to provide us with more in-depth content, please do this on a separate page and attach it to this form when returning it to us.

The specific provisions of the proposal that my submission relates to (e.g. provision number, map)	Do you: • Support?  • Oppose?	What decision are you seeking from Council?  Select which action you would like: • Retain • Amend • Add • Delete	Reasons
<i>Example: Zoning</i>	<i>Example Support</i>	<i>Example Retain zoning for proposal</i>	<i>Example Supports the growth of Dargaville</i>

Please return this submission form and any attachments **no later than 5pm on Monday 26 September 2022** to:

Kaipara District Council, Private Bag 1001, Dargaville 0340, or

Email: [planchanges@kaipara.govt.nz](mailto:planchanges@kaipara.govt.nz) or

Hand-deliver this Submission to Kaipara District Council, 32 Hokianga Road, Dargaville

Signed: 

Signed: .....

Date: 26/9/22

Date: .....

(A signature is not required if you make your submission by electronic means)

**PRIVACY ACT NOTE:** Please note that all information provided in your submission is considered public under the Local Government Official Information and Meetings Act 1987 and may be published to progress the process for the private plan change and may be made publicly available.

# Awakino Point Rate Payers Inc Submission to Private Plan Change 81 – Dargaville Racecourse

Kaipara District Council  
Private Bag 1001  
Dargaville 0340

## Submitter Details

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## 1. Introduction

This is a submission by Awakino Point Rate Payers Inc (APRP) on Private Plan Change 81 to the Kaipara District Plan.

The APRP is an incorporated society consisting of residents and ratepayers from Awakino Point and Te Wharau areas. Members of the APRP are directly affected by the adverse effects of the proposed plan change.

APRP could not gain an advantage in trade competition through this submission.

The APRP opposes PC81. The specific provisions of the proposal that the APRP relates to is:

The provision for residential development on the Dargaville Racecourse Land and its effects in relation to:

- Reverse sensitivity on existing farming operations and the loss of productive rural land.
- Traffic effects and safety at the intersection of SH14 and Awakino Point North Rd.
- The disposal of stormwater and the effects of stormwater on surrounding properties.

## 2. Reasons for the submission

### Consistency with higher level planning documents

APRP supports the growth and development of Dargaville, and in particular residential development, that is consolidated around existing settlements, and is consistent with the patterns of growth planned for in the Kaipara District Plan, the Northland Regional Policy Statement (RPS) and the Dargaville Spatial Plan. APRP considers that this pattern of growth will make the most efficient use of existing public infrastructure, with the lowest cost to existing ratepayers, and will reduce the loss of productive soils which are a significant driver of the Kaipara economy.

12.1

APRP considers that the proposal will encourage ad hoc development, that is contrary to provisions in Chapter 3 of the Operative Kaipara District Plan<sup>1</sup>. The proposed plan change also fails to give effect to the provisions of the RPS which seek inter alia, to manage the regional form of growth and development, to avoid sterilising productive and industrial land, and to maximise the benefits and efficient use of existing infrastructure<sup>2</sup>.

KDC have recently invested significant resources into consulting on and preparing the Dargaville Spatial Plan. This document underpins the preparation of the upcoming review of the District Plan. APRP considers that by providing for residential development in this area, rather than the area to the northwest and southern areas of Dargaville (as agreed on by the community) the proposal will not give effect to, and effectively undermines the Spatial Plan.

12.2

The proposal will effectively sterilise the area of proposed heavy industrial land before it has been zoned by the upcoming district plan review. The assessment of costs and benefits<sup>3</sup> fails 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.

12.3

APRP acknowledges that the draft district plan is still in its early stages of development, however it is considered that the proposal is contrary to the desired direction of urban form and development in the exposure draft of the District Plan, which KDC have recently been consulting on.

### Reverse Sensitivity Effects

APRP supports growth in the Dargaville area that avoids more intensive development in unsuitable areas, such as hazard zones or areas used for horticultural and agricultural production. APRP is particularly concerned about the loss of agricultural land and the potential for this proposal to increase reverse sensitivity effects by introducing incompatible activities like residential development into productive rural areas.

12.4

APRP considers that the provision of residential development and aged care facilities on the racecourse land will adversely affect existing farming operations by creating new reverse sensitivity effects. Rural production activities in the Awakino Point area involve various seasonal activities that may create conflicts with sensitive residential activities.

New residents in the area are likely to be sensitive to livestock noises, heavy vehicle movements, spraying of horticultural crops, aircraft noise, bird scaring devices, shooting, and activities creating dust.

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<sup>1</sup> Objectives 3.4.2, 3.4.3, 3.4.8

<sup>2</sup> Issue 2.4, Objectives 3.5, 3.6, 3.8, and 3.11

<sup>3</sup> Option 3, Table 6, Pg Statutory Assessment Report prepared by Lands and Survey Whangarei Ltd

To address this issue the applicant has proposed screen plantings and 'generous' setbacks between buildings in the General Residential Area of 20m from the Rural Zone, and 10m from Awakino Point North Rd. APRP considers that these setbacks are inadequate and will be ineffective in mitigating reverse sensitivity effects associated with the activities described above, eventually leading to restrictions on existing rural production activities on the surrounding land.

12.5

In comparison the Operative District Plan's rural zone provisions require a separation distance between noise sensitive activities and noise generating activities such as a dairying shed or feed storage area of 300m.

Introducing incompatible activities will restrict opportunities for rural activities, create ongoing costs to the rural economy, and will force food production activities further out of town to less suitable areas, requiring higher inputs, higher transport costs and increased emissions.

12.6

The economic analysis<sup>4</sup> supporting the plan change application considers the loss of income from grazing the racecourse land, however it fails to consider the costs and lost opportunities that will be created by reverse sensitivity impacts on the existing farming operations of surrounding landowners. The assessment of alternative options<sup>5</sup> for the site also fails to consider these costs.

#### Traffic Effects

the Proposed Development is expected to significantly increase congestion on State Highway 14 between the Racecourse land and Dargaville. The applicants traffic modelling suggests that the development will create a significant increase in traffic movements at the intersection of SH14 and Awakino Point North Rd. Mitigation measures recommended in the integrated transport assessment include upgrading the intersection, sealing Awakino Point North Rd, and creating a Pedestrian/Cyclist Link into Dargaville.

12.7

APRP has significant concerns with the assumption that a 4 km walking/cycling track into Dargaville will be utilised by new residents enough to mitigate any adverse effects on the transport network between the site and Dargaville, particularly when a significant proportion of the residents are likely to be elderly and will need to drive to town to access groceries, health and social services.

APRP is also concerned if the plan change is approved, the proposed provisions do not provide any certainty that traffic and transport effects will be mitigated through the physical works recommended by Stantec in their integrated transport assessment. It is noted that Waka Kotahi have only provided their agreement in principle to provide for the walking/cycling link into town from the site.

12.8

The subdivision provisions<sup>6</sup> require upgrades to intersections and the provision of pedestrian connections into Dargaville where subdivision is of any allotment in the proposed General Residential Area, however it is unclear how the requirement for these mitigation measures would be triggered were the applicant to apply for a land use consent to establish multiple residential units without subdividing. APRP considers that the proposed provisions that trigger infrastructure upgrades must be strengthened to ensure that the costs of infrastructure upgrades are borne by the developer, and not ratepayers and occur in a sequenced manner before any residential development takes place.

12.9

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<sup>4</sup> Economic Impact Analysis – prepared by the Urban Advisory

<sup>5</sup> Table 6 – Page 89 of Statutory Assessment Report prepared by Lands and Survey Whangarei Ltd

<sup>6</sup> TDA-SUB-S10 Transport

### Stormwater

APRP has significant concerns around the increase in impervious surfaces, and the ability to manage increased stormwater flows on site. There are already significant flooding concerns in the areas surrounding the site, particularly at high tide, and these may be exacerbated due to predicted sea level rise in the future. APRP considers that the proposed stormwater controls are inadequate and that any development on the site should ensure that post development stormwater flows from the property are managed so that they do not exceed predevelopment flows.

12.10

### Other matters

APRP are concerned with the potential loss of the Silver Pine Pony Club which leases part of the racecourse land. This is a valued sporting facility which will have to relocate and could potentially be lost if the Plan Change is approved. APRP considers that accommodations should be made for the pony club to continue operations on an area of the site, recognising the history of equestrian and racing activities that have taken place on the site over a long period of time.

12.11

## 3. Summary

In summary APRP is not opposed to development of the race course land however we consider that the Private Plan Change 81 proposal:

- Is ad hoc development in an area unsuited for residential development.
- Does not give effect to the Northland Regional Policy Statement.
- Is contrary to chapter 3 of the Operative Kaipara District Plan.
- Is contrary to the Dargaville Spatial Plan.
- Is contrary to the desired direction of the exposure draft of the Kaipara District Plan.
- Will create adverse effects on the environment with regard to reverse sensitivity, transport, infrastructure, and stormwater, that would directly affect members of the APRP.
- Has not adequately considered the costs of the proposal with respect to costs on surrounding land use activities, a lack of capacity of heavy industrial land, or costs to taxpayer and ratepayers for upgrades of the transport and stormwater networks.

Given the above, APRP considers that proposed plan change proposal does not facilitate the most appropriate use of the racecourse land and is not the most effective and efficient way to achieve the purpose of the Resource Management Act 1991.

## 4. Decisions for Council to Make

APRP seeks that the KDC make the following decisions when progressing the draft plan to a proposed plan change:

- Reject the plan change
- Retain the Rural Zone zoning at Awakino Point.
- Consider the costs to the economy associated with introducing sensitive activities into a productive rural environment.

12.12

If the Council is of a mind to approve the plan change APRP seeks that plan provisions are included that:

- Restrict the amount of residential development on the site and include effective provisions to avoid the creation of reverse sensitivity effects.
- Include appropriate provisions that require upgrades to transport and other infrastructure prior to the establishment of residential activities.
- Ensure that provisions are included to manage the impacts of stormwater runoff on surrounding properties.

APRP wishes to be heard in support of this submission if a hearing is held on this matter.

Yours Sincerely

Colin Rowse

President

Awakino Point Rate Payers Incorporated