

# Private Plan Change 83 – The Rise Limited

Clause 6 of Schedule 1, Resource Management Act 1991

## Submitter details

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

I would like to present my submission in person at the hearing.

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## **Introduction**

The section 32 report states:

*Technical assessments have demonstrated that the current rural zoning is not the most appropriate zoning of the site.*

*The evaluation of plan change concludes that these amendments are the most appropriate way to achieve the purpose of the RMA.*

These are standard arguments presented to justify a plan change. However, a far more important factor is the feasibility of developing a new urban area on the outskirts of the existing urban area.

The unconstrained growth of the Mangawhai urban area is not possible because it is limited to the east by the harbour and the sea. Development to the north, west and south is limited because of the lack of the necessary infrastructure. The Kaipara District Council does not currently have any plans or the financial capacity to provide the required infrastructure for any additional urban developments in those areas.

In addition, Mangawhai is a special case. It is an appealing place to live because of its natural features such as its harbour and estuary, its golf course, its fishing, its surfing and other

amenities, and its placement between Auckland and Whangarei. It is a popular location for holiday homes and retirement. Unfortunately, the enjoyment of those amenities is already threatened by the dramatic growth of Mangawhai over the last few years. It has reached a stage where any further growth in population is going to overwhelm the facilities and the amenities of the township, and prejudice the enjoyment of the those features which make our township “Magical Mangawhai”.

The Mangawhai Central residential development (PC78) has stalled because of the lack of infrastructure. When, and if, that issue is solved it is going increase the population substantially and put pressure on the township’s facilities and amenities.

The time has come when we have to accept that there can be no further urban development of Mangawhai at this stage.

We need to catch up with the infrastructure, especially in respect of the three waters, namely water, wastewater and stormwater. We desperately need a secondary school, and possibly a second primary school before any further development can take place.

Mangawhai is especially popular because of its outstanding attractions, such as the surf beach and the estuary. Unlike housing development these attractions, and the access to them, are limited and cannot grow. Already they are crowded and the enjoyment of them is already being limited because of the increase in the number of residents. It is not just the number of residents that is relevant. The number of visitors of those residents, and tourists, must also be taken into account. Even the recent arrival of New World and Bunnings will add considerably to the number of visitors.

In short, there is a limit to how many more people Mangawhai can sustain without destroying the special features and amenities that make it so appealing.

## **Demand for housing**

The section 32 report makes the following comments:

*The plan change will provide capacity for residential development, contributing to the capacity of Mangawhai to meet housing demand.*

*Policy 6: It is considered that this plan change will be consistent with the planned urban built form anticipated for Mangawhai giving effect to the Mangawhai Spatial Plan and the Mangawhai Structure Plan.*

*It is acknowledged that this plan change application seeks to bring forward residential zoning ahead of Council’s Draft District Plan, however the residential zoning is anticipated in the Mangawhai Spatial Plan. It is considered that this plan change application will add significant residential development capacity to Mangawhai. As such, Council should be responsive.*

*It is considered that the plan change is in accordance with both the Mangawhai Structure Plan and Mangawhai Spatial Plan direction for residential land use activities.*

*The plan change will be consistent with the planned urban built form anticipated for Mangawhai giving effect to the Mangawhai Structure Plan.*

The Mangawhai community would respond to those comments by asking if it is the role of Mangawhai to respond to a demand for housing when it does not have the infrastructure for more housing, and an increase in population will actually destroy the amenity values of the township.

The report also draws on support from the Mangawhai Spatial Plan.

### **Mangawhai Spatial Plan**

Many of the reports in support of PPC83 argue that the proposed development is consistent with the Mangawhai Spatial Plan in which the proposed development site is considered appropriate for further residential development.

*The plan change seeks to rezone an area of land identified as an urban residential growth area, as Residential Zone with the Cove Road North Precinct which will provide for a level density consistent with that anticipated by the MSP [Mangawhai Spatial Plan]. It is considered that the plan change is entirely consistent with the MSP and will achieve all of the outcomes sought.*

The Spatial Plan is a non-statutory document. It is a blueprint for how Mangawhai could grow over the coming years. The emphasis is on “could grow” if all the considerations relating to growth are met.

The Mangawhai Spatial Plan is highly aspirational and assumes that Mangawhai can continue to grow at its current rate of growth, and even more, by overcoming its acknowledged restraints. It anticipates that by 2043 Mangawhai could have a population of around 10,000.

Residents of Mangawhai respond to that vision in two ways. First, the amenities that make Mangawhai so special would be destroyed. Second, there will not be enough infrastructure to support that number of people.

These are discussed in turn.

### **Amenities**

The Foreword to the Spatial Plan by the previous Mayor, Jason Smith, states:

*Nothing stays the same forever. Kaipara is the fastest growing district in Northland, which is a trend we expect to continue for some time. This plan is a step towards directing growth in a planned and sustainable way over the next 30 years. It will lay the foundations for future strategies and actions, for refreshing our District Plan and for building infrastructure that will meet the demands of the growing community.*

He goes on:

*We know people are attracted to Mangawhai for many reasons; the incomparable beaches and clean harbour, the coastal walks, the easy lifestyle, the proximity to*

*Auckland, the tight community feel and much more. While these attractants will continue to evolve as we grow, we have sought to capture the essence of what Mangawhai is all about.*

He appears to suggest that meeting the demands of a growing community is compatible with the “easy lifestyle” that residents currently enjoy, and that those features of Mangawhai that attract people “will continue to evolve as we grow”. That is unlikely. The better approach is found on page 26 of the Spatial Plan:

*A managed approach to the population growth and residential development of Mangawhai is required. This would better provide for the needs of a changing community ..... and respond to the desire of the community to retain the unique coastal landscape character and amenity of Mangawhai.*

The comment in the last sentence - *respond to the desire of the community to retain the unique coastal landscape character and amenity of Mangawhai* – represents the views of the community, as mentioned in the Introduction.

This leads on to the other important point made by Mayor Smith:

*This plan will allow the Council to be master, not servant, of growth, allowing options for development, while also placing boundaries around what is sustainable and what is not. Growing like topsy is not a phrase to be applied to Mangawhai.*

That is the essence of the debate about future development. Is development and growth in itself the purpose of planning? Should any development be permitted simply because it meets the requirements of the Operative District Plan, or a change to that plan? Or should we be considering the feasibility and the desirability of having future development that destroys the character and overloads the amenities of our township? And should we allow developments to proceed on the basis of ad hoc services cobbled together in the absence of any actual infrastructure and without any cohesive infrastructure plan for a consistent and planned future development of Mangawhai?

Some would argue that calling a halt to further development is nimbyism - those who already live there try to block others moving in. In fact it is simply a matter of preserving the essential qualities of a location. All locations that have high appeal have limits to how much they can increase their population without destroying those qualities that make them appealing.

Mayor Smith suggests that the Council should be the master of growth, and not the servant of developers. Unfortunately Mayor Smith’s unconditional support for Mangawhai Central - which his Council allowed to proceed without a water supply, without wastewater infrastructure, and without an adequate power supply - suggests that it was a case of development at any cost at the behest of the developer.

Having learned our lesson the hard way, the community needs to ensure that in the future it has a much greater say in how development should proceed. The KDC should listen to it ratepayers and residents.

That is one reason why a development such as PPC83 should not proceed on the basis of a plan change application. If the development requires a fundamental change to the Operative District Plan then it should be the subject of the much broader consultation process through the adoption of the new Operative District Plan, not just the minimal and narrow consultation for a plan change. That is the only way that the community as a whole can have a say on the broader significance of future development, on planned infrastructure, and the effects on the amenities of the township.

## **Infrastructure**

Mayor Smith's Foreword in the Spatial Plan states:

*This plan is a step towards directing growth in a planned and sustainable way over the next 30 years. It will lay the foundations for future strategies and actions, for refreshing our District Plan and for building infrastructure that will meet the demands of the growing community.*

The Spatial Plan was released in December 2020, nearly 3 years ago, before the infrastructure issues relating to the Mangawhai Central development arose. It is therefore useful to see what targets for infrastructure were included in the Spatial Plan, and whether they were achieved in the Mangawhai Central development.

The targets were:

*Careful planning for additional three waters infrastructure and management mechanisms is required to avoid adverse effects on the physical and natural environment. Financial planning is also required in order to avoid economic stress on the community and the Council.*

We would all agree with this target.

*Also, the funding and construction of infrastructure will need to be synchronised with population growth, in order to continue to meet the needs of the community. Any changes to the Kaipara District Plan to accommodate additional growth in Mangawhai need to be accompanied by infrastructure planning, funding and construction. It is expected that the cost of growth will be met by land developers and recovered through development contributions.*

The Mangawhai Central development was a testing ground for those targets. Sadly, none of those aspirational targets was met. Rather than ensuring that the developments was synchronised with the funding and construction of infrastructure, the KDC actually misrepresented that the MCWWS had existing adequate capacity to accommodate the full Mangawhai Central development. When that was proved to be incorrect, the KDC then advised that the MCWWS had sufficient planned and funded capacity for the whole development. That also proved to be incorrect.

The Mangawahi Central plan change was adopted by the KDC without the necessary infrastructure and without planned and funded infrastructure.

We have ended up with a development where only the commercial part has proceeded. The residential development cannot proceed further until there is an adequate water supply available and there is adequate wastewater infrastructure either in place, or it is planned and funded through a long term plan. That requires consultation with the community. Unfortunately, it was necessary to appeal the relevant plan change to the Environment Court to ensure that adequate infrastructure was provided.

The Mangawhai community has learned that the “careful planning” in KDC plans is not always what it is stated to be. It also means that the Mangawhai community wants to ensure that the PPC83 is not blighted with the same infrastructure issues that befell Mangawhai Central.

## **Wastewater**

None of the PPC83 reports provide definitive details on how wastewater services are to be provided. There is an acknowledgement that Mangawhai Community Wastewater Scheme (MCWWS) is virtually at capacity. There are no current proposals for the scheme to be expanded and upgraded.

The Mangawhai Focus of 24 April 2023 reported:

[23042 April Two.indd \(adobe.com\)](#) page 8

### ***\$68M FOR UPGRADING CONTROVERSIAL MANGAWHAI WASTEWATER SCHEME***

*Kaipara District Council says it is looking to the future with a proposed \$68 million wastewater scheme upgrade for Mangawhai. Just 136 connections are left before the controversial 13-year-old Mangawhai community wastewater scheme (MWWS) reaches its 3000-connection capacity, probably next year. The \$68 million spend would be spread over more than two decades and eventually boost scheme capacity by almost 70 per cent to 5000 connections.*

As a result PPC83 suggests that the issue of wastewater be deferred to later stages in the development.

*JAS Civil Limited have acknowledged the disposal capacity constraints, concluding that this does not prevent the rezoning of the plan change area, and that future Resource Consent applications will require a robust assessment to be undertaken at the time of development. Furthermore, the proposed provisions ensure that there are engineering solutions available to service future development.*

*Precinct provisions ensure that at time of development, wastewater disposal will be provided by way of either connection to reticulated infrastructure where capacity if available or onsite disposal. S32 report*

That is not acceptable. Ad hoc development without infrastructure cannot continue. The KDC is facing a crisis in respect of wastewater infrastructure because of the dismal performance of previous councils. The MCWWS is close to its use by date and big decisions

have to be made about the future of wastewater, and how it is to be provided and funded before new developments of this size proceed.

In addition, there is a massive historic debt for the MCWWS. Development contributions were levied on connections with a view to the debt being repaid by the time the plant reached capacity. Prior councils failed to set development contributions at the right level resulting in a black hole of about \$30 million of debt once capacity is reached. That will now become a burden on ratepayers who are already paying the interest on the debt.

The cost of funding the historic debt and funding future wastewater infrastructure is an issue that needs to be resolved through careful planning, through a long term plan, in full consultation with a very concerned community. Simply deferring decisions on vital infrastructure until later in the development process is to invite the same outcomes that we have just experienced with Mangawhai Central.

### **Alternative wastewater provisions**

It appears that if there is no reticulated wastewater system in place the development will rely on individual wastewater systems for each lot, or a wastewater scheme for the whole development. There are minimum details relating to such proposals and their feasibility.

It also has to be considered whether the KDC is going to change its stance on private wastewater schemes within the catchment area of the MCWWS which requires them to connect to the scheme. The present site might be outside that area, but as a matter of policy the boundary might be extended to include the subject site. We need to remember that the drivers for the MCWWS were to avoid pollution of the harbour, and to fund the scheme by requiring all lots to connect to it.

The other major point is the fact that the applicant does not own the majority of the land in the development site. There are many other lot owners who live on their rural properties and who may not be willing to be part of the proposed development. That makes it impossible to consider any proposal for infrastructure that services land over which the developer has no control. It means that there can be no private wastewater scheme for the whole of the site in PPC83.

That raises the question of whether the development should proceed on the basis that each of the small lots created will have its own disposal system. Are we going to return to the situation where, because of the absence of planned infrastructure, each new lot in future developments is to be serviced by its own septic tank or equivalent?

### **Stormwater**

The provisions for stormwater are to be deferred until the subdivision stage.

*Stormwater:*

*The precinct provisions also seek to amend Rule 13.14.5, to ensure that stormwater management is appropriately designed at subdivision stage, following best practice of Stormwater Management Devices in the Auckland Region (GD01) and requiring a*

*detailed stormwater assessment and management plan to be prepared and submitted in support of any subdivision application.*

*JAS Civil Limited have reviewed these provisions and confirm that these are sufficient to mitigate the potential effects on the receiving environment from residential development. It is considered that this confirms that potential effects of stormwater as a result of the proposed rezoning can be managed.*

With so many separate lot owners it will be almost impossible to plan stormwater management across the whole site. This will create problems where stormwater from a higher lot flows on to a lower lot.

The proposal also suggests that up to 60 per cent of the each lot size will be impermeable. That reduces the amount of land that is available to absorb stormwater and will accentuate flow paths on to neighbouring lots. This will be accentuated because of the hilly terrain.

This problem is illustrated by storm water recently escaping from the site and causing flooding at the entrance to the Sanctuary on the other side of Cove Road. Clearly the issue of stormwater disposal was not considered sufficiently when consents were granted for the Pigeonwood Place development.

## **Infrastructure Strategy**

Just a few comments about this document which was referred to in the section 32 report:

*7.4.3 Infrastructure Strategy 2018- 2048 (June 2021) The Infrastructure Strategy seeks to outline how Kaipara District Council will manage the provision of infrastructure roads, water, wastewater, stormwater and flood protection to meet population growth and economic demands. The Infrastructure Strategy anticipates the total capital and operating expenditure over the 30 year period. The Infrastructure Strategy identifies a number of significant projects relevant to Mangawhai, including the Mangawhai library and wastewater treatment plan upgrades (up to 7000 connections), waters storage and security of waters supply, town centre upgrades. The plan change seeks to rezone the area from Rural to Residential Zoning, the proposed zoning is consistent with the anticipated growth of Mangawhai in accordance with the MSP which has been provided for within the Infrastructure Strategy. As such the plan change is consistent with the expected growth and strategic direction anticipated and provided for within the Infrastructure Strategy.*

The Infrastructure Strategy and the Mangawhai Spatial Plan were both aspirational. They have since been superseded by events. In any case, they are not relevant to PPC83 as the development is being planned on the basis that it will not require reticulated water or reticulated wastewater. As for the proposal being “consistent with the expected growth”, that is presumably based on there being adequate infrastructure available for the development, which there is not. As for “strategic direction”, one would hope that it includes providing for development that does not impact on the amenity values that make Mangawhai so special.



## Water supply

The KDC has made it clear that it is not considering providing a reticulated water supply for Mangawhai in the near future. It appears that the developer accepts that there will be no reticulated water supply for the site. Therefore it will be over to each individual lot to collect and store rainwater. This will impact on the minimum lot size as allowance must be made for at least two water tanks on each lot.

The lack of a reticulated water supply is an ongoing constraint for any future development in Mangawhai, especially with lot sizes of 400m<sup>2</sup> anticipated by PPC83.

## Community

The Mangawhai Spatial Plan sets out the following targets:

- ® Provide additional community facilities that continue to meet the needs of the growing and developing community.*
- ® Advocate for the provision of a Secondary School.*
- ® Develop and implement a strategy to address the shortage in aged care facilities.*
- ® Support initiatives for a safer community.*

There is nothing in PPC83 that suggests that there will be any contribution to community facilities. On the other hand it is clear that the development will create even more pressure on the current limited community facilities, especially in relation to schooling.

## Transport

### Cove Road

The issues relating to Cove Road becoming a by-pass with a significant increase in traffic has been touched on in the relevant reports. This will need expert input and consideration of how to mitigate any issues.

### Internal roading

The section 32 report has this to say:

#### *8.3 Transport*

- Roads can be constructed to all parts of the precinct with gradients within the limits specified by the Engineering Standards 20119 and reasonable vertical alignment (such that visibility from driveway connections and internal intersections will be at least adequate); and*
- Overall, it is concluded that the precinct area will be easily accessible for all anticipated development, that the effects of the generated traffic can be readily managed internally and that external road network has ample surplus capacity for it. Based on the conclusions drawn in the Traffic Assessment Report, it is considered that,*

*the plan change area is suitable to be rezoned Residential Zone with a Precinct and potential effects with respect to transportation will be less than minor.*

This is not correct. The majority of lots are not owned by the developer, and some of those owners are not sympathetic or supportive of PPC83. Therefore positioning access roads on their lots may not be possible. Even if they were supportive, in many instances their lots have been developed in a way that would not support the roading network and walkways as shown on the concept plan.

The Integrated Transport Assessment (Appendix 4) has this to say:

*With the number of lots enabled by the proposals, a new internal network of public roads and walking/cycling paths will almost certainly be necessary. A plan of possible indicative roads and walking and cycling paths is provided with the Precinct Plan, but the proposed district plan provisions only relate to connection points and connectivity, so there is significant flexibility for future developers on the locations of the roads and pathways.*

*With the proposal being a plan change rather than a subdivision, it is only necessary to demonstrate that: 1. All parts of the precinct that are suitable for development are accessible;*

Again, this misstates the situation. Because of the separate ownership of lots there is no flexibility for roading placements. It is also wrong to say that all parts of the precinct that are suitable for development are accessible. That is unlikely to be the case.

Even if they were, the location of existing houses on the lots means that the location of roadways on the concept plan is not feasible.

The same report also lists the elements of the Movement Network at 3.2. This includes internal paths and streets. However, of the 8 elements those numbered 3 to 8 are on lots not owned by the developer so there is no certainty, and it is unlikely, that paths and roads could be located as indicated.

## **Lot sizes**

There is some confusion over lot sizes in the proposed rules.

Appendix 9 (Proposed rules) states in red:

**13,13x**

**Subdivision Design Rules:**

**2. Any subdivision within the Cove Road North Precinct shall ensure:**

**a. Every allotment has a minimum net site area of 400m<sup>2</sup> except where the proposed allotment is located within the Northern Area as shown on Precinct Map 1; or**

**b. Every proposed allotment within the Northern Area as shown on Precinct Map 1 has a minimum net site area of 1000m<sup>2</sup>; and**

- c. Proposed allotments have an average size of at least 600m<sup>2</sup>.

However, Appendix 8 (Landscape Assessment) and Appendix 7 (Urban Design Assessment) both state:

13.13x

Subdivision Design Rules:

2. Any subdivision within the Cove Road North Precinct shall ensure:

a. Every allotment has a minimum net site area of 400m<sup>2</sup> where a connection ~~there a connection~~ to public reticulated wastewater infrastructure is available, or a private wastewater system is proposed to be established to serve all proposed allotments, except where the proposed allotment is located within the Northern Area as shown on Precinct Map 1; or

**b. Every allotment has a minimum net site area of 850m<sup>2</sup> where a connection to reticulated wastewater infrastructure is not available; and**

c. Every proposed allotment within the Northern Area as shown on Precinct Map 1 has a minimum net site area of 1000m<sup>2</sup>; and

d. Proposed allotments have an average size of at least 600m<sup>2</sup>.

Rule 2 b (in bold) is not part of the Appendix 9 rules. As a reticulated wastewater supply will not be available, it means that all lots will have a minimum net site area of 850m<sup>2</sup>. Presumably this extra size is needed to accommodate the wastewater disposal system on each lot.

Appendix 4 (Integrated Traffic Assessment) also states on page 1:

*Specific provisions, including objectives and rules, are proposed for the area. The key provisions in relation to traffic impacts are the subdivision rules, in which subdivision is a restricted discretionary activity provided that the minimum lot size is:*

- 1,000 sq.m in the "larger lot sub-precinct" located in the north of the area,
- 400 sq.m where communal sewerage is available;
- 850 sq.m where communal sewerage is not available

There needs to be clarification as to which version of rule 13.13x is proposed.

The average lot size of 600m<sup>2</sup> is misleading and irrelevant. The issue is whether the smallest lot size of 400m<sup>2</sup> is of sufficient size to provide for infrastructure services

There seems to be no consideration of lot size in relation to water supply. It is clear that there will be no reticulated water supply, only harvested rainwater. Lots of 400m<sup>2</sup> would be far too small for rainwater storage tanks.

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**I do not support the application in its present form.**

”Clive Boonham”

Clive Boonham

22 August 2023

# \$68m for upgrading controversial Mangawhai wastewater scheme



A \$68m upgrade of Mangawhai wastewater scheme is being proposed.



Wastewater irrigation specialist Peter Gearing (standing) addresses KDC's briefing meeting about the Mangawhai community wastewater scheme expansion and upgrade.

BY SUSAN BOTTING,  
LOCAL DEMOCRACY  
REPORTER FOR  
NORTHLAND

Kaipara District Council says it is looking to the future with a proposed \$68 million wastewater scheme upgrade for Mangawhai.

Just 136 connections are left before the controversial 13-year-old Mangawhai community wastewater scheme (MWWS) reaches its 3000-connection capacity, probably next year.

The \$68 million spend would be spread over more than two decades and eventually boost scheme capacity by almost 70 per cent to 5000 connections.

Phase one will see \$3.5 million spent almost immediately on installing technology to turbo charge wastewater processing capacity before December.

KDC general manager infrastructure services Anin Nama said the plant's improvements would use technology similar to that Auckland's Watercare was

already using.

Nama said phase one would also involve turning the plant's new holding tank into a third sewage treatment unit. It would also include more preparation for discharging the plant's treated effluent on to the Mangawhai Golf Course via the sub-surface rather than an above ground irrigation option.

He said the goal was to use the golf course as the scheme's main discharge option, rather than the Brown Rd farm which would shift to becoming a backup. The upgrade includes \$15 million being spent on the Brown Rd farm the council owns.

Nama has put together a new multi-disciplinary team of experts in wastewater treatment, subsurface irrigation and construction cost estimation whose members have worked in New Zealand, Australia and across the Asia-Pacific.

The team had looked anew at what had initially been identified in a December 2022 master plan strategy requiring \$90.5 million to be spent on the expansion over 10 years.

"The peer review has

been conducted by leading experts in wastewater treatment and effluent reuse," Nama said.

The review team had been asked to confirm the lowest cost pathway for MWWS to meet forecast demand growth and enhanced treated effluent disposal to the Mangawhai Golf Course.

Nama said he was aware of the wastewater scheme's history. That was why one of the peer review team brought in



Anin Nama, KDC general manager infrastructure.

an expert on construction cost estimating, to ensure indicated figures were reliable.

The review team updated KDC on progress at a council meeting in Mangawhai on 5 April. This included outlining the updated preferred

option going forward, and timelines.

Nama said a report based on their work would next be presented to the council in June. The council would then likely make a formal decision before the end of the year on proceeding with this phase.

When asked if Kaipara ratepayers would be paying for the new Mangawhai expansion Nama said the council would be looking at funding options for the first phase to deal immediately with addressing the scheme's looming capacity limit. This could include borrowing.

The MWWS expansion comes on the cusp of a potential July 2024 transition to the new Three Waters governance and management system. This will see the helming of more than a \$1 billion of Kaipara and Northland drinking water, wastewater and stormwater assets – and debt – shifted from three district councils to the new water service organisation known as Entity A. This will include Auckland Council's council-controlled organisation Watercare.

Nama said necessary planning for funding and work on the project's further phases has been done taking account of the transition to Entity A. Shifting to Entity A potentially means spreading the cost of Mangawhai's \$68 million extension across 1.8 million people, rather than KDC's 25,000 strong population.

The expansion's second phase includes \$20 million to boost the wastewater treatment plant's filtering performance to produce the

A-grade treated effluent, and \$7 million to set up the golf course for this effluent's discharge. This phase is scheduled to begin in 2028.

The long and tortured history of the Mangawhai wastewater scheme has been mired in controversy since the need for a reticulated treatment plant became a significant issue for KDC in 1996, after septic tanks started polluting Mangawhai Harbour.

Mangawhai ratepayers were initially told

the sewage scheme would cost no more than \$10.8 million when it was announced in 2003. That went to \$37 million when building started in 2009 and up to more than \$60 million by 2013.

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