

Submission on Proposed Private Plan Change 84 – Mangawhai Hills Limited

From: Northland Regional Council

To: Kaipara District Council
Private Bag 1001
Dargaville 0340

planchanges@kaipara.govt.nz

NRC Contact: Ingrid Kuindersma
Policy Planner
ingridk@nrc.govt.nz

1. Northland Regional Council (NRC) welcomes the opportunity to submit on the Plan change. This feedback is made in the interests of sustainable management of natural and physical resources within the Whangarei District and the Northland region. The submission has been drafted and lodged by staff under delegated authority.
2. Plan Change 84 has been reviewed against the following overriding principles:
 - The need for district plans to assist district councils to carry out their functions to achieve the purpose of the Resource Management Act 1991 (RMA), and
 - The need for district plans to 'give effect to' national and regional policy statements and to not be inconsistent with regional plans, and
 - NRC's statutory obligations, roles and functions under the RMA as well as other Acts, including the Local Government Act 2002.

Our Submission

General

Submission Point 49.4

The proposed plan change would result in the rezoning of 218.3 hectares of land from rural to residential use creating development rights of a much higher density than currently provided for. There is no reticulated water supply and we understand there is limited capacity within the wastewater system to service these additional lots. While it is acknowledged that the plan change itself does not place a demand on services, it does create the right and expectation to develop at a residential density. An estimated yield of up to 600 lots has been suggested in the application and careful consideration needs to be given to the ability to sustainably service this intensity of development. Approximately 4ha of the subject land is identified as Land Use Capability (LUC) 3 and

therefore requires assessment under the provisions of the National Policy Statement – Highly Productive Land (NPS-HPL). Consideration of the soils assessment provided by the applicant will be required to determine if the rezoning of this land would be consistent with the provisions of the NPS-HPL.

Detailed submission points:

Submission Point 49.1

Water Supply

Adequate potable water supply is an important aspect for consideration. The land subject to the rezoning proposal does not have access to a reticulated water network and will need to rely on rainwater capture and on-site storage to provide for drinking water and firefighting supply. Northland is prone to extended dry periods and drought. The 2019/2020 drought highlighted some of the water resilience issues facing the area (and wider region) and vulnerability of some water supply networks.

Given the long-term climate change projections for Northland indicate increased likelihood of extended dry periods/ drought, an increase in the number of hot days per year, and increased risk of wildfires, sufficient provision for water storage is essential to create a sustainable development. Current NRC advice indicates that an on-site storage capacity of 50,000 litres for an average household of up to four people would provide for an appropriate level of water resilience.

The potential rezoning from rural to residential provides for much smaller lot sizes down to an area of 1000m² per residential unit. With lots of this size it can be difficult to accommodate residential buildings as well as the two standard size water tanks needed to provide 50,000 litres of water storage. Therefore, the water storage requirement should be made clear at the time of development to ensure development can be planned to accommodate the tanks.

Relief sought:

Addition of the highlighted text to the proposed rules:

DEV1-R2 Residential Unit

1. Activity Status: Permitted

Where:

50,000 litres of onsite potable water storage per residential unit is provided.

Submission Point 49.2

Wastewater Disposal

Current capacity in the Mangawhai Wastewater treatment plant is limited and it is unclear if connections will be available to subdivisions within the plan change area at the time of development. If on-site disposal is to be utilised, allotments must have sufficient area to achieve compliant wastewater disposal.

The proposed wastewater rule for Mangawhai Hills Development Area differs from the current district plan Rule 13.14.6. The existing rule requires (inter alia) that where a reticulated wastewater

system is available, a wastewater connection is provided within the allotment. Where no connection is available, 1500m² of land per household is provided for wastewater disposal within the net site area of the allotment.

The proposed rule for Managawhai Hills Development Area only states that a connection may be utilised and does not state a minimum area required for wastewater disposal.

The original wording in the district plan is considered to be appropriate and these provisions should be retained for Mangawhai Hills Development.

Relief sought:

That Rule 13.14.6 - Wastewater Disposal in the district plan applies to development in the Mangawhai Hills Development Area and the alternative wording for the rule proposed in the plan change document is not adopted.

We also seek rules that explicitly state a minimum lot size of 2000m² be required where no wastewater connection is available to ensure future development can provide 1500m² of land per household for wastewater disposal within the net site area of the allotment.

Submission Point 49.3

Flood Hazard

Portions of the proposed plan change area are identified in the Northland Regional Council hazard maps as being potentially subject to river flood hazard and coastal inundation. It is important that any development within these areas is appropriate and there is no increase in risk or vulnerability due to the potential for damage from flooding or coastal inundation or for the development to exacerbate the hazard. Section 7 of the Regional Policy Statement provides guidance on how natural hazards are to be managed within the Northland region.

Relief sought:

That the proposed precinct plan delineates the areas subject to a 1:100 year coastal or river flood hazard on the Northland Regional Council hazard maps and identifies that these areas are unsuitable for residential development (including any associated wastewater disposal). Ie no residential building platforms or wastewater disposal areas within the 1:100yr hazard areas.

NRC wish to be heard in support of this submission.

If others make a similar submission, NRC will consider presenting a joint case with them at a Hearing.

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

Signed:

A handwritten signature in blue ink, appearing to read "Tami Woods". The signature is fluid and cursive, with a period at the end.

Tami Woods - Planning & Policy Manager
Dated: 22 September 2023