



## Form 5

Submission on a notified proposal for Private Plan Change 85 – Mangawhai East

*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)*

First name\*

Surname\*

Agent (if applicable)

Postal address\*

Postcode

Contact phone

Daytime phone

Mobile phone

Email address for Submitter\*

Email address for Agent (if applicable)

Please select your preferred method of contact\*

By email

By post

Correspondence to\*

Submitter (you)

Agent

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: **PPC85**

Plan change name: **Mangawhai East**

The purpose of the plan change is to:

- a. Rezone approximately 94 hectares of rural zoned land within the Mangawhai Harbour overlay to a mix of residential and commercial zoned land as follows:
  - Large Lot Residential 6.3 ha
  - Low Density Residential 45.5 ha
  - Medium Density Residential 12.5 ha
  - Neighbourhood Centre 2.7 ha
  - Mixed Use 2.2 ha
  - Rural Lifestyle 24.7 ha

**Total Area = 94 ha**
- b. Create a Development Area containing a suite of planning provisions to control and manage subdivision, use and development within the Plan change area.
- c. Apply a Coastal Hazard overlay over the land area identified to be potentially subject to coastal hazard where the effects of potential mitigation measures will need to be managed.
- d. Include Ecological features maps to convey areas of ecological sensitivity for future protection.
- e. Incorporate a Structure Plan into the Development Area to visually depict key features and outcomes required.
- f. Make any necessary consequential amendments to the Kaipara District Plan Maps.

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 PPC85 you may only make a submission if you are directly affected by an effect of PPC85 that adversely affects the environment; and does not relate to trade competition of the effect 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 in 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
<b>Example:</b> Zoning	<b>Example:</b> Support	<b>Example:</b> Retain zoning for proposal	<b>Example:</b> Supports the growth of Mangawhai



## Submission on Proposed Private Plan Change 85 – Mangawhai East

**Attn:** District Planning Team  
Kaipara District Council  
[planchanges@kaipara.govt.nz](mailto:planchanges@kaipara.govt.nz)

**From:** Northland Regional Council

**NRC Contact:** Megha Sethi  
Freshwater Policy Analyst  
[meghas@nrc.govt.nz](mailto:meghas@nrc.govt.nz)

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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 Kaipara District and the Northland region. The submission has been drafted and lodged by staff under delegated authority.
2. Plan Change 85 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.

### General:

3. The proposed plan change would result in rezoning approximately 95 hectares from rural to residential and some commercial zoned land. A considerable part of the Private Plan Change 85 land is classified as Land Use Capability (LUC) 3 and therefore requires assessment under the provisions of the National Policy Statement – Highly Productive Land (NPS-HPL). Additionally, Policy 5.1.1 (f) of the Regional Policy Statement for Northland (RPS) directs plan changes and subdivisions to ensure that the potential for soil based primary production on land with highly versatile soils (such as LUC3) is not materially reduced, or if they do, the net public benefit exceeds the reduced potential for soil-based primary production activities. 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 and RPS.
4. Parts of the Plan Change area are identified as flood prone within NRC's hazard maps. NRC does not support upzoning to allow for intensive development within hazard areas.

5. There is no reticulated water supply available within the Plan Change area, therefore, rainwater harvesting and storage is proposed. This raises issues with regard to water security for future residents and this is addressed further below.

### Detailed submission points:

#### 6. Coastal Flood Hazard

- 6.1. The applicant's Coastal Processes and Hazards Assessment notes that the north-east and coastal estuarine areas of Private Plan Change 85 area are potentially affected by coastal inundation and subject to flooding during a 1-in-100-year storm event, taking into account projected sea level rise over the next 100 years. The Private Plan Change accounts for this hazard with proposed Coastal Hazard Overlay and application of the Rural Residential and low-density residential zones, which limits development intensity.
- 6.2. The applicant's flood hazard risk assessment has been reviewed by NRC's natural hazards specialists, and they consider it to adequately assess the risks associated with building in hazard prone areas of the Plan Change site. While most of the identified hazard areas are intended to remain undeveloped, there is still a residual risk that development could occur through case-by-case resource consents. This risk must be avoided to keep new development consistent with Objective 3.13 (c) of the RPS as Objective 3.13 (c) directs avoiding inappropriate new development in 10- and 100-year flood hazard areas and coastal hazard areas.
- 6.3. **Relief sought:** That the land identified as hazard prone in the NRC flood maps to the north-east and coastal estuarine areas of the proposed plan change area is not rezoned for intensive residential development. These areas are potentially affected by coastal inundation and subject to flooding during a 1-in-100-year storm event, taking into account projected sea level rise over the next 100 years.
- 6.4. Should there be any development in the coastal flood hazard area, it must be consistent with Policy 7.1.2, and 7.1.3 of the RPS.

#### 7. Water Supply

- 7.1. 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.
- 7.2. 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.

- 7.3. The potential rezoning from rural to residential may provide for much smaller lot sizes, down to an area of 1000m<sup>2</sup> per residential unit or even less. 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, it is recommended that the water storage requirement of 50,000 litres be made clear at the time of development to ensure development can be planned to accommodate the tanks. This would enable the new development to be consistent with Policy 5.1.1 (d) and (h) and Policy 5.1.2 (d) of the RPS.
- 7.4. **Relief sought:** Add a provision to Appendix 3: Development Area Provisions requiring 50,000 litres of on-site water storage for domestic use through rainwater collection for each residential unit.



**Name:** Tami Woods

**Title:** Planning & Policy Manager

**Date:** 18 August 2025