

## Form 5

### Submission on Private Plan Change 85 – Mangawhai East – to the Kaipara District Council (KDC).

#### Submitter details:

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

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.

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

I would not like to present my submission in person at a hearing.

If others make a similar submission, I will consider presenting a joint case with them in the hearing.

## **I am opposed to PPC85.**

My main areas of concern are:

- PPC85 will enable development which will threaten the ecology of Mangawhai including numerous Threatened and At-Risk species.
- PPC85 will put significant pressure on the already stretched infrastructure of Mangawhai, including roads, wastewater and access to recreational spaces.
- PPC85 will enable development activities that will degrade the amenity and natural character of Mangawhai and the Mangawhai Estuary.
- PPC85 is inconsistent with the Mangawhai Spatial Plan for Growth.
- PPC85 is inconsistent with the KDC Proposed District Plan.
- PPC85 will enable development activities close to the boundary with Mangawhai Estuary that will affect its ability to absorb present and future inundation naturally along that edge.
- PPC85 will enable development activities close to the boundary with Mangawhai Estuary that will restrict natural processes and coastal retreat under predicted sea level rise, and potentially restrict public access along the coast under future higher sea levels.
- A fourth town centre (commercial hub), as proposed in PPC85 is wildly unnecessary, and not in keeping with Mangawhai's quiet coastal community feel.
- PPC85 will cause significant congestion at the main gateway into/out of Mangawhai (intersection of Black Swamp Rd, Tomarata Rd, Insley St).
- PPC85 argues that KDC needs to provide sufficient development capacity to meet expected demand in the short, medium and long term, however this has already been achieved by KDC through recent PPC's. There is more than sufficient capacity to meet projected growth over the long term, and it has been taken into account by KDC in its Proposed Plan.

## **PPC85 will enable development which will threaten the ecology of Mangawhai including numerous Threatened and At-Risk species:**

Mangawhai is a highly significant ecological area, supporting over 65 Threatened and At-Risk species. PPC85 will enable development which will create an unmitigable level of human disturbance that will detrimentally impact the areas highly sensitive ecology. The site supports critical feeding and breeding habitat for Critically Endangered Australasian Bittern, while the surrounding area is critical feeding and breeding habitat for Critically Endangered NZ Fairy Tern. This site and surrounds are also important for numerous other Threatened and At-Risk species (see table 1). The surrounding estuary which currently has very little human traffic, is a critical feeding site for numerous shorebirds, sea birds and wetland species. Of note, the Mangawhai harbour supports one of the largest populations of NZ dotterel. The wetlands, saltmarsh and mangroves onsite and surrounding also support important populations of At-Risk Banded rail, Fernbird, and NZ pipit.

Granted, there are some possible mitigation measures, but these will be unsatisfactory for adequate ecological protection. For example, development will facilitate an increase in domestic pets such as cats and dogs which will negatively impact native

biodiversity through an increase in predation and disturbance. Pet free covenants and leashed pet walking can be implemented, but without adequate enforcement, are ineffective (particularly for pet free covenants, which practically, cannot and are not enforced). Similarly, the development will facilitate a huge increased human use within the CMA and near sensitive wetland areas (i.e. walking & watercraft). This will cause disturbance limiting and/or preventing feeding and breeding for many of the Threatened and At-Risk species mentioned in Table 1. The effects of increased human use of this relatively undisturbed area cannot be mitigated and will have detrimental consequences for indigenous biodiversity.

**If KDC continues to allow PPC's, it undermines having a District Plan. I would ask that KDC declines PPC85.**

**Table 1: Ecological Values, PCC85.**