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Royal Forest and Bird Society

Northern Branch

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Whangarei District Council

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Submission to:

Plan Change 113- Ruakaka Racecourse – closing date 26 April 2013

From the F&B Society Northern Branch:

*We wish to be heard

*We could not gain an advantage in trade competition through this submission

Submission Points

1. F&B considers that the application for a Plan Change to make a Ruakaka Equine Environment [REE] owned by the Whangarei Racing Club excessively exceeds the definition of 'equine activities' for the equine zone. F&B can appreciate that the expansion of training and horse related activities, and also, compatible equine-related buildings are needed to secure the longterm viability of the 50 hectares of the Ruakaka Racecourse. However, the addition of high quality residential and mixed use developments unrelated to 'equine activities' would cumulatively lead to the ecological unsustainability of the land of the application, and, surrounding public lands. **F&B submits that the development exceeds the parameters of equine activities needed for longterm viability and jeopardizes the longterm viability of environmental sustainability on the Racecourse land and the surrounding public conservation land. F&B also submits that an appropriate cap on housing be set.**
2. F&B is concerned that the continued access to the Racecourse for development for increased 'equine activities' would be highly dangerous in the present situation. The 'blowout' on the sand-dunes opposite the Racecourse frequently covers the road. It is churned up by 4 wheel drive vehicles now and presents a danger to all pedestrian traffic going to the beach as well as to traffic wanting to access the Racecourse. From F&Bs view this continual onslaught to the sand-dunes at the present access way is a threat to the stability of this sensitive coastline. This area of coast [survey no QO7/128] is named Ruakaka Dunelands,

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comprising coastal dunefields and beach sands. It is a 19km band of sand dunes from Marsden Point in the north to Waipu River Estuary in the south. It has the largest continuous stretch of duneland habitats in the Waipu Ecological District. About 80% of the habitats are under legal protection. It has an international ecological rating of Level One. F&B acknowledge the Wildland Consultants Report and will not repeat what they have professionally already brought to attention. But, F&B repeat these dunefields are unique. **F&B submit that any equine activity development cannot take place with the present access 'blow-out' on the sand dunes with sand dune stability being threatened. Any increased pedestrian traffic through the dunes must be provided for in an ecologically acceptable plan.**

3. F&B found it disturbing to read that 'a management plan would be required to be prepared **once** more than a 100 dwellings are built.' This sequence ie build the houses then have a management plan, very clearly echoes the pioneering spirit of our forefathers who slashed the trees and then experienced the erosion. F&Bs experience of Residents' Societies to conserve the flora and fauna after everyone has gone, and, willingness of residents to help maintain sand covered beach access is not positive. In the same vein, we learn that 'retirement units and visitor accommodation are unlikely to attract occupiers that will place wildlife at risk.' F&B has many times found visitors to Ruakaka with horses are focussed on the rights of the horse and/or rider and, everything, everything is 2nd place. The education and advocacy needed to correct their cavalier mind set is monumental. **F&B submit that a Management Plan containing ecological education about the indigenous fauna and flora must be clearly in place for potential residents and or visitors, in this sensitive area. The residents/visitors must be required to be cognizant of their legal ecological obligations to the environment before they are residents/visitors. [A Plan would include a ban on keeping cats and dogs and mustelids.]**
4. **F&B submit that the WDC longterm wastewater strategy to dispose of waste water [that includes the potential Ocean outfall] must be used and that no onsite waste water structures be allowed at any stage.** The risk from leaching from the applicant's area of overloaded onsite structures to eg the dune lake, is too high.
5. F&B are concerned that the dune lake appears to be 'just a lake' and that it will not receive the special attention it needs. Droughts, draw off consents by the

Whangarei Racing Club, unlawful encroachments by present residents into the lake area, nutrient runoff from residents' gardens and vegetation 'cleansing' by present residents ie removal of indigenous plants, all make a negative mix that does not give hope for longterm sustainability. **F&B submit that the Wildland Consultants Report concerning the dune lake facts be considered in depth by the applicant and that the ramifications of neglect in this area would amount to an ecological disaster.**

In Summary, F&B endorse the Wildlands Report and that the knowledge given should be fully realized as to the true ecological situation in the Applicant's area.

F&B have also focussed on special areas of concern: the development exceeds the parameters of equine activities needed for the Racecourse longterm viability; the proposal exceeds the carrying capacity that would enable the ecological longterm sustainability of the area; sustainability of the sand dunes is at risk ; an ecological Management Plan be presented to potential residents **before** any development; a longterm waste water plan must include the use of the WDC waste water strategy and that there be no onsite waste water units; and that, the dune lake be fully recognized for the unique place it has in the ecology of this area.

Bev Woods, Secretary.

F&B acknowledges the effort made by the Whangarei Racecourse management to 'educate' the horseowners about their obligations to the dunefields. There has been definite improvement. All the recent damage to the dunes has been by visitors who park their horsefloats at the 'blowout' and gallop from the Refinery to the Wild life Refuge. It seems if you don't live and/or work where you exercise your horses there is no incentive to learn about the environment.