Plan Change 120: Response from Mahurangi Community Planning Group Inc

PC120 policy objectives are fine

PC120 makes broad based changes intended to quickly achieve three objectives:

- Removal of MDRS (3X3) standards applying to PC78
- application of a policy of intensification near transport hubs and town centres to meet the 2m houses constraint; and
- classification (and restriction of building) in areas of identified natural hazard risk.

These are sensible and desirable policies, but their blanket application ignores local level disruptions, lacks proper planning and horizontal integration of infrastructure provision, and creates problems that will be expensive to solve in future.

Zoning and the Unitary Plan have already caused Chaos for Warkworth

Lack of horizontal integration between local communities' knowledge, private development, Council investment (or lack of) and Government agencies have meant:

- Designation of Warkworth as a "Satellite Town" reflects mistaken suburban design thinking in a rural settlement area.
- District wide development planning and growth is put aside in favour of urban designed reticulated intensification – without the reticulation!

Classic examples of mismatched investment and service development under the Warkworth Structure Plan are:

Poor water management:

- The Ridge: Developers of this area have provided consented housing for years without reticulated sewage because Watercare has not provided the necessary pipeline infrastructure.
- Housing intensification and lack of capacity and failure by Watercare to resolve sewage ingress in the stormwater system has seen sewage overflows into the Mahurangi reiver destroying the livelihoods of downstream oyster farmers.
- Additional North and North West subdivision development – Warkworth North – Stubbs farm, Falls Road, Hudson, (PPC25), McKinney Road (PPC72) and Warkworth South (PPC93), will add to problems for stormwater drainage, sewage disposal and transport congestion around the Town centre.

- Large format retail in a small Town is provided for and has developed in two places, one a flood plain. This also has added to transport network capacity problems.

Poor transport management:

- Uncoordinated speed limits produce confusion and risk – particularly in the North West out of Warkworth and the area around the motorway and Link road, and Kaipara flats road /Goatley road intersection.
- The Grainge small centre development near the town centre but developed before the motorway when traffic used the old SH1 was impacted significantly.
- Additional housing around the centre is already putting pressure on Warkworth streets which have not had capacity extended to cope.
- PC 93 as approved envisages a significant growth in the South Warkworth when transport and long term water connections are not assured.
- The Hill street intersection has been an ongoing congestion and safety concern which has not been addressed (funded) despite being impacted increasingly by population growth around the Town Centre.
- Providing a Park-n-Ride and running occasional, empty or poorly matched to the demand, buses to and around Warkworth at a considerable loss funded by ratepayers without any choice does not make Warkworth a connected suburb of Auckland. Cars and associate carparking are essential to the lives of most Warkworth and District residents.

Other Rodney District "disconnects" from poor intensification include:

- Population growth driven traffic bottlenecks at Matakana – completely avoidable.
- No planning for development in Wellsford means development is haphazard and faces further conflicts when the new motorway impacts the Wellsford and Mangawhai communities.
- Kumeu is an unresolved problem area where NZTA won't withdraw NOR's into the flood zone so affected businesses are dying and the town centre needs to move.

PC 120 will make it worse:

1)Too general and without local detail analysis

The review for the PC was done by Auckland Council (AC) quickly and generally across the whole of AC. It did not allow time to evaluate the effects of changes and implications in detail at a community level.

This means policy driven changes are a blanket response that takes no account of local circumstances, needs or implications.

Inappropriate intensification changes in areas like Warkworth have the effect of changing the character of the town. Residential intensification around the town centre through the proposed zone changes:

- Is inconsistent with the thinking and arguments supporting the Warkworth Structure Plan
- doesn't reflect the future growth expectations of residents and ratepayers in their area; and
- Changes the character of the town and town centre from a rural node to an urban suburb (without all the infrastructure of urban suburbs)
- Completely ignores any integration of the associated infrastructure needed from central government agencies – schools, healthcare and welfare assets and services.

The policy of intensification around Transport Hubs and Town Centres needs appropriate differentiation to recognise that:

- calling something a Park-n-Ride and stopping occasional buses there does not make it a Transport hub; and
- calling a rural node a "Town Centre" does not make it an urban suburb.

AC should not adopt a one-size-fits-all approach and must allow differentiation in land use regulation to show the different character of rural vs urban land use.

2) Plan zoning contradicts previous plans in areas unaffected by the policy objectives.

Intensification changes in Warkworth are contrary to Auckland's approved 50 year plan, Structure Plan and Auckland Strategy.

Developers Plan Changes have already provided intensification around Warkworth and further intensification is not needed. The Structure Plan and private Plan changes approved in line with it support 7,500 new homes and 20,000 more people. [Note no AC infrastructure provision is allowed for to support this growth. The Town Centre, live zoned areas and surrounding District were excluded.]

Intensification in Warkworth by changing the Residential – Single House zoning in Warkworth to Residential – Mixed Suburban or Residential - Mixed Urban is not necessary to achieve the objective of 2m homes. AC has not calculated the actual number of dwellings that would be built if all proposed rezoning was utilised to the

maximum, and even if it did, intensification in WW beyond what is provided in the Structure Plan is not shown anywhere as needed.

It is just a blanket application of a policy that wrongly treats WW like a suburb of Auckland;

The existing Residential – single house zoned area in WW was left as it is in the Structure Plan and Auckland Strategy and should be left as it is in PC 120

Natural Hazard responses: Raising consent cost is not the only Option

In addition to adding building restrictions, Natural Hazard areas have added consenting (and insurance) costs for any new developments on those areas. These increased consenting costs are for geotechnical or climate specialist assessments needed to provide comfort to Council and Government that consent may be given without incurring unreasonable liability from granting consent in the case of a hazard event.

The principle of Councils and Government avoiding any liability and/or remediation costs from consenting construction on sites assessed as subject to natural hazard risks is sound.

But the proposed approach will involve Council (i.e ratepayers) in considerable costs of litigation with landowners over the method and reasonableness of the hazard assessment as landowners contest the designation and fight to have it removed.

But a cheaper and fairer option is for landowners to effectively self-insure against hazard risks.

As long as they comply with any building standards and standard Unitary Plan restrictions on construction on the site, landowners should have an option to avoid the need for any additional consent costs by indemnifying AC against any costs from natural hazard risks.

(Standards compliance is a separate, but important, issue for which landowners must accept liability – with potential penalties and remediation costs - for non-compliance.)

AC should allow this option – with on-title registration of the covenant ensuring that future owners remain bound.

As a general principle, with the Government moving generally to strengthen the quality and application of building standards, Council should review its processes with a view to a minimalist approach.

This would see landowners building without needing any Council consent as long as they comply with building standards and Unitary Plan rules. Council responsibility would shift to enforcing compliance by random checks and responding to complaints:

- Non-standard construction would be required to be removed (no post-construction consents allowed);
- costs would be allocated on an at fault basis;
    - Council would cover the costs of random inspections;
    - landowner would pay Council costs as well as deconstruction costs if breach(es) found; and
    - Complainants would pay a fixed cost (refunded if breach found).

Minimum Recommendations for PC 120

Zoning

Restore all the Residential – Single House zoning in Warkworth from the proposed Residential – Mixed Suburban or Residential - Mixed Urban

Planning

Support preparation of a community-led Development Plan for Rodney (starting with a pilot for the Warkworth Town centre). This initiative, supported by the Rodney Local Board, will engage all relevant parties and comprehensively provide agreed guidance for development decision-making by landowners, businesses, Council and Government agencies. It will provide the necessary spatial plan for the area, integrate the different private and public investments, and identify the appropriate regulatory land-use controls.

Hazards

Provide landowners whose properties are identified as having natural hazard risks an option to effectively self-insure against those risks.

Construction on those properties would specifically exclude Council and Government from any liability associated with the natural hazards specified and be registered on the property title to ensure continuing compliance. Compliance and costs to be as suggested above.

Pete Sinton
Chair: Mahurangi Community Planning Group 17 December 2025