

MEMORANDUM

To | The Hearings Panel
From | Summer Salmon, Waikato District Council (Section 42A report author)
Subject | Hearing 16: Raglan – Response to the Minute from the Hearings Panel dated 12 August
Date | 18 December 2020

The Minutes from the Hearings Panel (dated 12 August, copies attached **APPENDIX A**) provide the following directions:

- a) *In conjunction with its consultant landscape architect, Mr Coombs, Council staff are to prepare a "draft scoping report" that provides an outline, in general terms, of how Council staff consider the proposed plan might best be amended to better reflect the "special character" of the urban areas of Raglan, the process of engagement it proposes and key milestone dates. The "draft scoping report" is to be provided to Kainga Ora, Raglan Naturally, Whaingaroa Environmental Defence Inc, Tainui o Tainui and Aaron Mooar ("the Raglan submitters") for comment no later than 5 pm on Friday 17 July 2020.*
- b) *All feedback from the Raglan submitters on the "draft scoping report" is to be provided to the Hearings Administrator no later than 5 pm on Friday 31 July 2020.*
- c) *Council staff are to consider the feedback received, produce a final scoping report, and provide it to the Hearings Administrator, no later than 5 pm on Friday 7 August 2020- In addition to confirming details of the matters set out in paragraph 6 a) above, the final scoping report shall include clear details of any process-related matters that are not agreed - either as between different Raglan submitters or between the Raglan submitters and Council staff.*
- d) *The Hearings Administrator shall then forward the final scoping report to the Raglan submitters and the Panel. On receipt of the "final scoping report" the Panel will issue any additional instructions it considers necessary to address any process related matters that are not agreed. Please note: The "final scoping report" is not an updated section 42A report, but rather a report requested by the Panel in accordance with section 41(4) of the RMA to assist in reaching decisions on the relief sought in submissions.*
- e) *The Council shall then then proceed to work through the detail of amending the relevant provisions of the proposed plan, in accordance with the process set out in 4 the "final scoping report"*

- f) Council staff are to seek feedback on the proposed amended provisions from all the submitters and further submitters on the Raglan hearing prior to presenting the Final Report to the Panel.*
- g) Council staff are to provide a Final Report to the Hearings Administrator setting out all the proposed amendments. In addition to providing an amended set of relevant provisions of the proposed plan, the Final Report must also clearly identify all matters that are not agreed, together with the reasons for that disagreement.*
- h) The Panel will consider the Final Report and issue any further Directions it considers necessary, which may or may not include the need for a further hearing.*

The purpose of this Memorandum is to provide the final report ('the Final Report') to you for review. The Final Report includes Councils recommended amendments to the proposed plan and details of substantive matters that are not agreed.

Appended to this Memorandum are the following documents for reference:

- a) Hearings Panel directions
- b) Minutes of meetings
- c) Report to Submitters/Further Submitters seeking feedback on the proposed amended provisions
- d) Feedback provided by submitters & further submitters on the proposed amendments
- e) Recommended amendments to plan

WORK UNDERTAKEN IN COLLABORATION WITH THE RAGLAN SUBMITTERS

Council invited the five submitters to meet (via Zoom on 13 August 2020, 3 September 2020 & 8 October 2020) to work through the detail of amending the relevant provisions of the proposed plan. Four submitters participated; Gabrielle Parson (Raglan Community Board, Raglan Naturally); John Lawson (Whaingaroa Environmental Defence); Aaron Moorar; Phil Stickney (consultant for Kainga Ora).

The Minutes from meetings are attached as **APPENDIX B** and summarise the feedback from submitters as to how and why these matters impact upon the special character of Raglan. In summary, the participants saw the special character of Raglan as due to topography and the "informal" mix of architectural styles of existing buildings, which are mainly single houses with low density and relatively small scale.

Six key areas of concern were identified at the meetings, and discussions principally focussed on these matters. The issues associated with the focus areas generally overlap. The six focus areas identified are as follows:

- 1) Building Mix
- 2) Affordable Housing
- 3) Density
- 4) Appropriate Location of Medium Density Development

5) Building Typology and Scale of Development

6) Views

A summary of the outcome reached for each topic is provided below.

1) *Building Mix*

Building uniformity was not supported. Rather a continuance of the current diverse mix of building styles was preferred. Detached single dwellings were favoured, which is considered to be the predominant typology now.

It was noted that recent buildings all tended to look the same. Options to promote more variety in the design of buildings nearby and across roads were discussed, including a design panel to assess new builds and a design manual similar to the Auckland design manual. These options were not developed in the discussion.

An example of undesirable development is the recent 11-unit apartment building development on Wainui Rd/Stuart St corner opposite the museum. Submitters sought additional design requirements on multi-unit development to avoid uniform appearance across the units but were generally happy with current height controls (7.5m max residential, 10m max business).

2) *Affordable Housing*

Submitters want opportunities for affordable housing. Participants recognised that controls on design, density and location could reduce affordability. One submitter held the view that that locating development within the town centre made housing more attractive and therefore more expensive, although the house and/or section is smaller. Another submitter felt that affordable housing is not something to be achieved by managing effects on character values and that any provisions relating to affordable housing would be more appropriately located within the zone provisions.

All submitters acknowledged there are challenges with the creation of affordable housing through the use of District Plan provisions in isolation from other organisations, mechanisms, and incentives. One submitter considered the effectiveness of mechanisms available to assist with achieving this objective would need to be considered in the context of a s32 assessment and their relevance to Raglan as distinct from other settlements in the Waikato District

This discussion overlapped with the density discussion

3) *Density*

The existing low density of Raglan buildings was considered a key component of Raglan character. It was acknowledged that low density was assured in some areas by the steep topography, but the character of the flatter land would be vulnerable to increased density.

No party was strictly opposed to higher density development, provided this type of development occurs in the right locations. All but Kainga Ora expressed that low density development in and around the town centre should be maintained.

This discussion overlapped with the appropriate location for medium density development discussion.

4) *Appropriate location of medium density development*

Discussions considered specific areas within Raglan where higher density residential development could be established. Kainga Ora's definition of medium density as one dwelling per 200m² was used as the basis for discussion.

Most submitters felt that the recent apartment development on the corner of Wainui Road/Stuart St was an unacceptable location, being too close to the harbour and town centre and they preferred a location hidden from the town centre. Possible medium density areas that received some support included the wharf/silo area, and land within the vicinity of Greenslade Road.

Kainga Ora advocated for medium density development around the town centre, with advantages being closeness to shops, facilities and public transport. The option presented by Kainga Ora for intensification around the town centre was not supported by other submitters, who felt this would not fit the character there. Kainga Ora held that locations near Bow St with advantages close to shops, facilities and public transport was appropriate.

All submitters acknowledged that the location of development would likely affect affordability.

Kainga Ora advised of their current collaboration with Council to identify appropriate locations throughout the district for medium density residential development. Following this work, Kainga Ora would be presenting a revised suite of controls to the Hearings Commissioners for their consideration and on that basis felt that any standards out of this work would require alignment with relevant standards sought by Kainga Ora for the settlements across the District.

Discussions concentrated on how growth within Raglan would be best accommodated in acknowledgement of the National Policy Statement on Urban Development which requires Council to plan for growth. Within Raglan it was noted this was particularly difficult due to seasonal population variation.

All agreed on the need for a structure plan for Raglan.

An appropriate location of medium density development was not agreed between the parties and this matter is not taken any further in this report.

5) *Building Typology and Scale of Development*

Submitters generally agreed with the content of the "Raglan Character Study" report (Isthmus, April 2020), presented at the hearing of submissions. However, some identified gaps in the Isthmus report relating to the character of the existing building typology within Raglan. Most submitters felt that the predominant building typology within Raglan is detached single level dwellings and that larger buildings should be discouraged, especially if located near each other.

Submitters acknowledged that topographical constraints influence housing typology and that as a result two-storey houses were not uncommon within Raglan (generally where land is sloping/steep).

Submitters did not challenge the notified bulk and location provisions of the proposed plan (even within proximity to the town centre) but thought that District Plan rules should allow for more diverse housing typologies and that more controls on building design for larger developments were necessary.

6) Views

Discussions considered the protection of views, especially to stop buildings blocking views from public places of the harbour, coast and Mount Karioi. There was some agreement on preserving the view from main road west of the BP petrol station looking south/west. This view captures Karioi, the coast, the harbour inlet, and the Bow Street shops.

Most submitters agreed the need to preserve views to the harbour from coastal public spaces and roads along the foreshore. An agreed example of what should be avoided is the museum building which blocks views from Wainui Road.

There was a discussion of alternative planning methods to achieve this objective (mapped viewshaft & associated rules matters of discretion). Submitters acknowledged the difficulty of implementing provisions associated with unmapped view shafts and the potential widespread (and unpredictable) constraints that would impose on development within properties under the viewshafts (mapped or otherwise).

The proposed amended provisions fell out of these discussions and were circulated to submitters and further submitters on 3 December 2020 for feedback (**APPENDIX C**).

FEEDBACK FROM SUBMITTERS & FURTHER SUBMITTERS OF HEARING 16

Following circulation of the proposed amendments, Council received feedback from 5 submitters as follows: Gabrielle Parson, John Lawson, Aaron Mooar, Alex Devine of Kainga Ora and Carolyn McAlley of Heritage New Zealand. Their feedback is in **APPENDIX D** and summarised below:

- HNZ advised they have no comment on this additional material related to the special character of the Raglan urban area.
- Gabrielle Parson advised she is generally happy with the proposed changes but queried whether the Isthmus report could be developed further to include more on building typology and scale and whether there might be an opportunity to test the strength of the new provisions against an application (such as the Wainui Road apartments) to ensure similar development can be prevented.
- Aaron Mooar felt that the provisions were not robust enough to ensure provision of affordable housing and provided additional amendments to the proposed provisions which he believes might better enable this.
- John Lawson felt that the circulated provisions did not promote affordable housing and did not accept that the provisions about design, building mix and aspects of affordable housing should be omitted because rules and definitions have not been developed. Rather, they should be developed and he is willing to work further on them.
- Kainga Ora expressed a number of fundamental concerns with the form and appropriateness of the Special Character provisions, most of all that the provisions are contrary to both the

NPS-UD and the notified PDP with regard to directing urban growth and development in the Waikato.

COUNCIL'S FINAL RECOMMENDED AMENDMENTS TO THE PROPOSED PLAN

The Hearings Commissioners directed that in this final report Council staff are to provide the proposed amendments. Accordingly, staff make the following recommendations derived from the discussions and communications described above. The recommended changes are shorter than the drafts discussed by the parties. Generally, the recommendations leave out matters that were disagreed between the parties and matters where implementation through district plan provisions did not seem feasible. A full copy of the recommended amendments is provided in **APPENDIX E**. In summary, Council staff decided on the recommendations for the following reasons:

- The main objective of the work is to address the special character of Raglan and the new objective seeks to ensure this and define the key characteristics and attributes that contribute to the special character of the urban area of Raglan.
- Acknowledging that the Hearings Panel received submissions seeking removal of the Raglan Town Centre Character Statement from the plan appendices, the amended Raglan Town Centre policy (Policy 4.5.14) includes the sought outcomes of the character statement (as per the s42A report).
- The proposed amendments to Policy 4.5.14 - Raglan Town Centre detailed in the s42A report for Hearing 16 are still supported but it is recommended that the policy remain in Section 4.5 of the proposed plan (as notified) rather than in this new chapter.
- Defining and mapping viewshafts would require extensive research and public engagement. In response, the approach by Council provides for generalised consideration of views instead.
- Council recognises that managing affordable housing through District Plan provisions in isolation of other mechanisms/legislation is difficult but also acknowledges the advantages of diverse communities which includes provision of affordable housing. In response, the approach by Council provides for generalised consideration of affordable housing instead.

MATTERS DISAGREED

The Hearings Commissioners directed that in this final report Council staff are to identify all matters that are not agreed, together with the reasons for that disagreement. The matters that are still not agreed and the reasons for disagreement are detailed below.

1) The appropriate location for medium density development

Disagreement about locating medium density development in and around the Raglan Town Centre. Some submitters feel this will alter the existing town centre character via larger scale, uniform buildings that block viewshafts. Kainga Ora support this type of development due to the advantages of being close to shops, facilities and public transport. Council acknowledge both views but have not recommended amended provisions on this matter, on the understanding this work is being investigated in a separate process initiated by the Hearings Panel and an amended suite of controls will be presented to the Panel for consideration.

2) *The inclusion of rules requiring the protection of specific (and described) viewshafts*

Most submitters support the inclusion of additional provisions seeking protection of specific viewshafts and felt that the provisions circulated by Council needed to be strengthened to ensure their protection. Kainga Ora oppose the inclusion of these provisions on the basis that implementation will be difficult if viewshafts are not spatially defined. In addition to this, Kainga Ora felt further analysis of the proposed viewshafts was required to justify the potential costs and benefits associated with their protection and to better understand how this will impact the proposed 'consolidated urban form' that the strategic objectives of the notified proposed plan seek to achieve.

Council agree that locally important viewshafts contribute to character but acknowledge that further work needs to be undertaken to spatially define the viewshafts and to better understand how their protection might impact on the growth of Raglan. Viewshafts would also potentially constrain development aspirations of individual landowners and the plan provisions would be best developed through a plan change process, enabling wide public engagement. In acknowledgement of views contribution to character, the recommended provisions provide for generalised consideration of views in the absence of further analysis.

3) *The inclusion of provisions for affordable housing*

Whilst Council acknowledges affordable housing is an issue nationwide, the Hearing 16 s42A report sets out the difficulties of managing this via District Plan provisions. Two of the submitters identify this as a significant issue and call for the inclusion of strengthened provisions which provide for affordable housing. Options such as tiny houses were favoured. Council generally agrees with Kainga Ora that affordable housing is not something to be achieved by managing effects on character values and is more appropriately managed via the zone provisions.

4) *The inclusion of provisions to ensure a diversity of building designs and styles*

A diversity of building designs and styles was considered a key aspect of the special character of Raglan. The parties discussed approaches to promote this. A draft rule was developed by council staff and discussed by parties, but it proved unsatisfactory due to the subjective assessment required and it was not developed further.

APPENDIX A

DIRECTIONS FROM THE PANEL DATED 12 AUGUST 2020

IN THE MATTER of the Resource Management Act
1991

AND

IN THE MATTER of hearing submissions and further
submissions on the Proposed
Waikato District Plan

AND

IN THE MATTER of matters relating to Hearing 16 -
Raglan

FURTHER DIRECTIONS FROM HEARING COMMISSIONERS

12 August 2020

Introduction

- 1 The hearing to consider submissions on those provisions of the proposed Waikato District Plan ("proposed plan") that relate specifically to Raglan was held on 2 June 2020 ("Hearing 16"). On 22 June, The Hearings Panel issued directions to Council and those submitters who addressed character-related matters at the hearing the opportunity to consider them in more detail. The Panel issued the following directions:
 - a) *In conjunction with its consultant landscape architect, Mr Coombs, Council staff are to prepare a "draft scoping report" that provides an outline, in general terms, of how Council staff consider the proposed plan might best be amended to better reflect the "special character" of the urban areas of Raglan, the process of engagement it proposes and key milestone dates. The "draft scoping report" is to be provided to Kainga Ora, Raglan Naturally, Whaingaroa Environmental Defence Inc, Tainui o Tainui and Aaron Mooar ("the Raglan submitters") for comment no later than 5 pm on Friday 17 July 2020.*
 - b) *All feedback from the Raglan submitters on the 'draft scoping report' is to be provided to the Hearings Administrator no later than 5 pm on Friday 31 July 2020.*
 - c) *Council staff are to consider the feedback received, produce a final scoping report, and provide it to the Hearings Administrator, no later than 5 pm on Friday 7 August 2020- In addition to confirming details of the matters set out in paragraph 6 a) above, the final scoping report shall include clear details of any process-related matters that are not agreed - either as between different Raglan submitters or between the Raglan submitters and Council staff.*

- d) *The Hearings Administrator shall then forward the final scoping report to the Raglan submitters and the Panel. On receipt of the "final scoping report" the Panel will issue any additional instructions it considers necessary to address any process related matters that are not agreed. Please note: The "final scoping report" is not an updated section 42A report, but rather a report requested by the Panel in accordance with section 41(4) of the RMA to assist in reaching decisions on the relief sought in submissions.*
- e) *The Council shall then then proceed to work through the detail of amending the relevant provisions of the proposed plan, in accordance with the process set out in 4 the "final scoping report" and provide a Final Report to the Hearings Administrator setting out all the proposed amendments, no later than 5 pm on Friday 25 September 2020. In addition to providing an amended set of relevant provisions of the proposed plan, the Final Report must also clearly identify all matters that are not agreed, together with the reasons for that disagreement.*
- f) *The Panel will consider the Final Report and issue any further Directions it considers necessary, which may or may not include the need for a further hearing.*
- g) *The Hearings Administrator is to provide these Directions to Kainga Ora, Raglan Naturally, Whaingaroa Environmental Defence Inc, Tainui 6 Tainui and Aaron Moorar and post them on the Council's website.*

2 In accordance with the above directions, on 7 August 2020, the Panel has received a Scoping Report from Council staff. The Scoping Report outlines how the Proposed Plan may be amended to better reflect the special character of the urban areas of Raglan. The Scoping Report has been formulated by Council staff having considered the feedback provided by the submitters on "special character" matters in Hearing 16 (Raglan) and Mr Aaron Moorar.

We would like to thank Council staff and the submitters for preparing and assisting with the Scoping Report.

Having considered the Scoping Report, and without seeking to deviate from the key milestone dates set out in the Scoping Report, the Panel issues the following further Directions to assist in the formulation of the amended provisions to be incorporated into the proposed plan to address the "special character" values of Raglan for our consideration:

- a) There is no need to spatially define a 'Raglan Special Character Area' ('RSCP'). The focus of the Final Report should be on identifying the specific amendments required to the objectives, policies and rules framework that apply to the Raglan urban area, but taking into account the scope and jurisdictional limitations explained in our Minute of the 8 June 2020. The Raglan urban area includes the land within the Residential, Business and Business Town Centre Zones that contribute to the special character of Raglan. The focus should be on the Raglan Town Centre area. Rangitahi Peninsula is to be excluded from this exercise.
- b) Council staff are to seek feedback on the proposed amended provisions from all the submitters and further submitters on the Raglan hearing prior to presenting the Final Report to the Panel.

- c) In order to enable a robust consultation process, the Panel has amended the due date for the Final Report, which is to be provided to Hearings Administrator no later than 5pm on Friday 23 October 2020.



Mr Paul Cooney (Deputy Chair)
On behalf of the Hearings Panel
12 August 2020

APPENDIX B
MEETING MINUTES

Raglan Character – Meeting 1

Summary notes of submitters discussion by Zoom 13 August 2020, 10am-1pm

Participating:

- WDC: Summer Salmon, Neil Taylor
- Consultant: Brad Coombs
- Submitters: Gabrielle Parson (Raglan Community Board, Raglan Naturally); John Lawson (Whaingaroa Environmental Defence); Aaron Mooar; John from Beca Consulting for Kainga Ora.

Four issues emerged from discussion: building mix, affordable housing, density, views.

1. Building mix

Participants said that they did not want building uniformity but want to continue the current diverse mix of building styles, which gives Raglan its character. “In Raglan ugly means uniformity.”

Submitters prefer detached single dwellings, which is the predominant typology now.

An example of undesirable development is the recent 11-unit apartment building development on Wainui Rd opposite the museum. There should be additional design requirements on multi-unit development to avoid uniform appearance across the units. Generally happy with current height controls (7.5m max residential, 10m max business.)

Discussion of Auckland provisions requiring assessment of “sameness” by reference to adjoining land and land across the road.

2. Affordable housing

Submitters want opportunities for affordable housing. Participants recognised that controls on design and density could reduce affordability. This discussion overlapped with the density discussion.

3. Density

Discussion of identifying specific areas of Raglan where a higher density residential could be established: possible areas mentioned were around the wharf/silo area, and Greenslade Rd vicinity. The option presented by Kainga Ora for intensification around the town centre was not supported, as this would not fit the character there.

There was no consideration of adjusting densities throughout Raglan.

4. Views

Discussion of protecting views, especially to stop buildings blocking views of harbour, coast and mountain.

Some agreement on preserving view from main road west of BP looking south/west – view includes Karioi, coast, harbour inlet, and Bow St shops.

Also, agreement about need to preserve views to harbour from coastal public spaces and roads along foreshore. Example of museum building blocking views from Wainui Rd agreed should be avoided.

Discussion of alternative planning methods – mapped viewshaft or rules/matters of discretion. Discussion of difficulty identifying people within mapped view shaft. John Lawson to circulate more examples of views for consideration.

Miscellaneous matters noted

- “Matters agreed” items in paper circulated confirmed, except no consensus on whether to remove or replace existing CBD character provisions
- Future rezoning of greenfield areas for urban development, as shown in Waikato 2070 – discussion of difficulties of extending character provisions there – issue will be brought to attention of hearings panel.
- The Isthmus report could be developed further to include more on building typology and scale.
- Kainga Ora would prefer that character provisions be in assessment criteria rather than a character statement or a design guideline.
- Affordable housing can be done in different ways, including small transportable houses.
- People element needs to be included in the consideration. (Noted that people’s behaviour cannot be regulated under district plan.)
- Mana whenua voice lacking in today’s discussion.

Raglan Character – Meeting 2

Summary notes of submitters discussion by Zoom 3 September 2020, 10am-12.30pm

Participating:

- WDC: Summer Salmon, Neil Taylor
- Consultant: Brad Coombs
- Submitters: Gabrielle Parson (Raglan Community Board, Raglan Naturally); John Lawson (Whaingaroa Environmental Defence); Aaron Mooar; Phil Stickney (Beca Consulting for Kainga Ora.)

Review of notes from 13 August meeting

Four previously identified issues for Raglan character agreed:

1. building mix
2. affordable housing
3. density
4. views

Add two more issues for Raglan character:

5. building typology and scale of development
 - Larger buildings should be discouraged, especially close together
 - Brad to develop ideas around building typology and scale
6. appropriate location of medium density development
 - Wainui Rd/Stuart St location was inappropriate
 - Location of development may affect affordability; smaller sites may be more expensive
 - Kainga Ora preference for locations near Bow St with advantages close to shops, facilities and public transport.
 - Kainga Ora to look for locations in Raglan shortly – medium density 1 dwelling per 200m²
 - How is growth best accommodated – National Policy Statement on Urban Development requires Council to plan for growth; noted that population projections are inconsistent; population varies seasonally; need for structure plan for Raglan.

Draft Introduction

Corrections noted: Wairēinga/Bridal Veil Falls; Whaingaroa Harbour references inconsistent; visitor numbers can be updated from recent reports; tourist attractions should be named, but only relevant if contribute to character; growth projections need to be verified.

- Add mihi (example in Boffa Miskell landscape report). Contacts with Ngati Mahanga and Tainui hapu suggested.
- Add how town centre impacts on wider Raglan – from p36 of Isthmus report.
- Add note on lack of Raglan structure plan, with reference to proposed district plan section 1.5.2 about structure planning.
- Add map of special character area including areas considered suitable for higher density (noted the Hearings Panel said a map was not necessary.)
- Add reference to Raglan topography, physical constraints on development.

Draft Objectives and policies

Objective 4.1.1 – could have affordability added

Policy 4.1.18 (iii) Rangitahi should not be the only developed area, include Lorenzen Bay as well.

Draft policy (b)

- “preserve” special character too strong – could be “maintain” or “contribute” or “enhance” (Comments - don’t want to turn Raglan into a museum, don’t want to stop innovation, just retain human scale, there can be development within the character as defined. Preserving buildings different from preserving character.)
- Add support for trees to be included in development, especially multi-unit development and in private and public spaces
- Discussion of community input into development decisions – noted RMA doesn’t support this generally
- Discussion of design guide included in proposed district plan (Appendix 3), whether this could provide useful approaches for retaining Raglan character
- Need for policy to be implemented through restricted discretionary consent criteria discussed. Summer and Brad will develop criteria.
- Para (ii) discussed – “predominant” and “appearance’ give some flexibility – predominant may have a different interpretation depending on location. Building design can give appearance of single dwelling but contain more than one dwelling. Policy could also say no big buildings in particular locations.

Draft Rules

- Further consideration of rules needed, short timeframe noted.
- Could go through an actual development to check the triggers

- Decide whether design guide should be retained
- Precincts, as in Auckland could be considered to over-ride zone standards
- Car-parking requirements need to be reviewed in light of NPS-UPS

APPENDIX C
PROPOSED AMENDMENTS CIRCULATED TO SUBMITTERS &
FURTHER SUBMITTERS

PROPOSED AMENDED PROVISIONS TO ADDRESS THE SPECIAL CHARACTER OF THE URBAN AREAS OF RAGLAN

Report to: Submitters on the Proposed Waikato District Plan, hearing of 2 June 2020.

As directed by the Hearings Panel (Minute dated 12 August and attached as APPENDIX A), Council, in collaboration with five submitters who presented to Hearing 16 (Raglan), have worked through the detail of amending the relevant provisions of the Proposed Plan to better reflect the special character of the urban areas of Raglan.

As part of this work, Council invited the five submitters to meet on two occasions (via Zoom on 13 August 2020 and 3 September 2020). Four participated: Gabrielle Parson (Raglan Community Board, Raglan Naturally); John Lawson (Whaangaroa Environmental Defence); Aaron Mooar; Phil Stickney (consultant for Kainga Ora.) During these meetings, six key areas of concern were identified, and discussions principally focussed on these matters. The Minutes from both meetings are attached as Appendix B and summarise the feedback from submitters as to how and why these matters impact upon the special character of Raglan.

In summary, the participants saw the special character of Raglan as due to topography and the mix of architectural styles of existing buildings, which are mainly single houses with low density and relatively small scale. Six focus areas were identified:

- 7) building mix
- 8) affordable housing;
- 9) density;
- 10) views;
- 11) building typology and scale of development;
- 12) appropriate location of medium density development.

Also considered important by most parties was the inclusion of:

- an introduction to the Raglan Special Character Area section of the plan to provide context for assessing resource consent applications; and
- adding an assessment of the existing built form within Raglan to the Isthmus character study attached to the hearing report (report author Brad Coombes participated in the Zoom discussions).

An appropriate location of medium density development was not agreed between the parties. Kainga Ora's definition of medium density as one dwelling per 200m² was used as the basis for discussion. Kainga Ora advocated for medium density development around the town centre, with advantages being closeness to shops, facilities and public transport. The other parties opposed this. They felt that the recent apartments development on the corner of Stuart St and Wainui Road was an unacceptable location, being too close to the harbour and town centre. Suggestions were made that a location hidden from the town centre (e.g. near the wharf) could be acceptable for medium density development. A location for medium density is not taken any further in this report.

Following these meetings, Council staff drafted amended provisions to address special character matters based on what the submitters would like to see in the District Plan. Council staff identified some aspects were already addressed in the notified plan provisions. New provisions were drafted to cover remaining aspects. This "Version 1" work was circulated to the five submitters for comment.

This version is attached as Appendix C and includes Councils staff comments on the draft provisions and a summary of feedback from submitters on Version 1.

Other issues with some of the amended provisions emerged as follows:

- The wording (particularly for development standards) was subjective, ambiguous and or problematic, making implementation difficult;
- Further investigations would be needed to validate an amended provision(s);
- The placement or structure of the amended provision(s) might differ from the notified version;
- Possible scope issues.

A second version, Version 2, is provided as Appendix D. This is the version of the recommended amendments which I seek comment on from all submitters and further submitters on the Raglan Hearing. This version revises the amendments contained in Version 1 where either:

- The matter is thought to be addressed in the notified plan;
- The amended provision is likely to cause an implementation issue(s) as identified above and is therefore unlikely to be recommended to the Panel;
- The amendment does not align with the notified structure of the proposed plan.

Whilst this version is simplified, it strengthens the requirement to consider the special character of Raglan.

The inclusion of both versions is intentional for two reasons:

- 1) In recognition of the commitment of the submitters who had input in the work.
- 2) To convey to the reader how and why the provisions have evolved.

Both versions and submitters feedback will be provided to the Hearings Panel in my final report.

Version 2 is presented as a table to provide you with a consistent format for providing feedback. Please make any comments in the spaces provided in Appendix D and copy the document back to me at: summer.salmon@waidc.govt.nz

Your feedback would be welcome but must be received by Council no later than **5pm on 11 December 2020**.

Please send feedback or any queries to summer.salmon@waidc.govt.nz

VERSION 1: DRAFT PROVISIONS

AMENDED PROVISION	COMMENTS & FEEDBACK	NOTIFIED PROVISIONS WHICH ADDRESSES MATTER
<p>APPENDIX B RAGLAN SPECIAL CHARACTER AREA (RSCA) Section B: Objectives and Policies Chapter 4: Urban Environment 4.8: Raglan Special Character Area</p>	<p>Not sure of best placement of this work as the notified version separates objectives and policies from rules. Acknowledge that the Panel may be inclined to change the structure of the notified version anyway to give effect to the National Planning Standards.</p>	
<p>Ko te pou whenua teenei mo ngaa hapuu katoa o te tai hauaauru, mai i te ngutuawa o Waikato tae atu ki Kaawhia. Kei waho raa i te moananui ko te motu o Kaarewa teetahi o ngaa whaiaapo o Karioi”</p> <p>“Karioi is the principal boundary post for the tribes and sub-tribes of the west coast, it is the gathering place of narratives, of genealogies, of histories ”.</p>	<p>I have taken this straight from the Boffa Miskell Waikato District Landscape Assessment. No input from mana whenua yet and therefore subject to change.</p>	
<p>4.8.1 INTRODUCTION (Full introduction & associated commentary provided below)</p>	<p>Acknowledge that the notified plan does not include an introduction to chapters and that the Panel have expressed that unnecessary information in the Plan will be trimmed. I think the Introduction helps to provide context to the provisions – could be more concise but also note this information can be contained within the provisions themselves if this is the preference of the Panel.</p> <p>One submitter questioned the necessity of an Introduction and commented that if it were to remain the focus of the Introduction should focus more on managing the effects of development on the streetscape & special character and not so much on the wider landscape setting.</p>	
<p>Map the special character area</p>	<p>The Panel have directed that the RSCA does not need to be mapped as it includes all urban areas within Raglan. Submitters would like this included as it is helpful to the end user.</p>	

<p>4.8.2 OBJECTIVES</p> <p>To be read in conjunction with other relevant objectives in Section B.</p> <p>4.8.2.1 Objective – Raglan Special Character Area</p> <p>(a) The key characteristics and attributes that contribute to the character of Raglan are recognised.</p> <p>(b) The physical attributes that define, contribute to, or support the special character of the area include:</p> <p>(i) built form, design and architectural values of buildings and their contexts;</p> <p>(ii) streetscape qualities and their randomness and diverseness; and</p> <p>(iii) the relationship of built form to landscape qualities and/or natural features including topography, vegetation, trees, and open spaces.</p> <p>(c) The adverse effects of subdivision, use and development on the identified special character values of the area are avoided, remedied or mitigated.</p>	<p>Acknowledge that the use of the word ‘recognised’ is subjective. Maintained is used in several of the notified objectives, however, one submitter was not supportive of the word maintained as it suggests no change is allowed, whereas change is inevitable.</p> <p>Possible better wording:</p> <p>(a) The key characteristics and attributes that define, contribute to, or support the Raglan Special Character Area are not compromised by incompatible development.</p> <p>Would be better if framed in the positive rather than the negative.</p> <p>Clauses (b) & (c) are not required as these aspects are covered Policy 4.8.3.1 below.</p> <p>One submitter questioned the use of words ‘randomness’ and ‘diverseness’ as the words are subjective and can therefore make implementation difficult.</p>	<p>4.1.7 Objective – Character of towns Development in the Residential, Village, Industrial and Business zones is attractive, connected and reflects the existing character of towns.</p> <p>Objective 4.2.1 Residential character of the Residential Zone is maintained</p> <p>4.2.3 Objective – Residential built form and amenity Maintain neighbourhood residential amenity values and facilitate safety in the Residential Zone.</p> <p>4.7 Urban Subdivision and development 4.7.1 Objective – Subdivision and Land Use Integration Subdivision layout and design facilitates the land use outcomes sought for the residential, business, industrial, reserve and specific purpose zones.</p>
<p>4.8.2.2 Objective - Locally Important Public Views</p> <p>(a) Locally important public views are managed to maintain and enhance the visual integrity of the views</p>	<p>I consider that if the viewshafts are not spatially defined, a definition for ‘Locally Significant Public Views’ could describe the views (see introduction below for proposed definition – needs to be more polished in terms of the descriptions of the views).</p> <p>Remove objective but retain associated policy as maintaining views contributes to the character of Raglan and therefore supports the objective (4.8.2.1)</p>	
<p>4.8.2.3 Objective - Affordable Housing</p>	<p>I consider the notified objective 4.2.16 & associated policy 4.2.17 cover off this aspect without the need to add any additional provisions.</p>	<p>4.2.16 Objective – Housing options (a) A wide range of housing options occurs in the Residential Zones of Huntly, Ngaruawahia, Pokeno, Raglan, Te Kauwhata and Tuakau.</p>

<p>(a) To promote increased housing supply, variety and choice by creating well-designed residential developments comprising a range of housing densities, typologies, and price options (including the provision of affordable housing).</p>	<p>Also, the name of the objective is incorrect if the promotion of diverse housing is the objective— providing diverse housing options will result in diverse communities (which provides opportunities for more affordable housing). ‘Housing Options’ is a more accurate name – Also noted by one of the submitters.</p> <p>Another submitter questioned the appropriate location for the objective but not the objective itself. Suggested the following wording: <i>‘To promote increased housing supply, variety and choice by enabling a range of housing densities, typologies, and price options (including the provision of affordable housing) to be delivered within Raglan’.</i></p> <p>This submitter also acknowledged the challenges other Councils have faced dealing with the creation of affordable housing through the use of District Plan provisions in isolation from other organisations, mechanisms and incentives.</p>	<p>(b) Residential zoned land near the Business Town Centre Zone and close to transport networks is used for higher density residential living with access to public transport and alternative modes of transport.</p>
<p>4.8.3 POLICIES</p> <p>To be read in conjunction with other relevant policies in Section B.</p> <p>4.8.3.1 Policy – Residential Subdivision & Development</p> <p>(a) Residential Subdivision and development maintain the special character of Raglan by:</p> <ul style="list-style-type: none"> (i) Mixing building architectural styles and materials, so that streetscapes contain a diversity of buildings with non-uniform appearance (ii) Ensuring that the predominant dwelling typology has the appearance of low-rise detached single dwellings (iii) Designing multi-unit development so that units have a non-uniform appearance and include frequent articulation of walls and roof lines (iv) Identifying areas for the establishment of higher density development visually separated by landforms from central Raglan 	<p>Unless rules are added to control building architectural styles and materials, Council generally wouldn’t have input into those aspects of the built form. Framing and implementing provisions to control built form that is similar (eg in a heritage precinct) is easier than framing provisions that require diverse built form.</p> <p>The same can be said for clause (ii). Unless rules require this, Council couldn’t control the predominant dwelling typology</p> <p>The notified provisions for multi-unit developments quite prescriptive and do not need to be added to - Clause (iii) not required as detailed above.</p> <p>Council in collaboration with another submitter are working on identifying urban areas within the district for medium density development. If areas are identified in Raglan more specific provisions could be added in this chapter to manage those activities. Some submitters did not want higher density development within Central Raglan because this would</p>	<p>4.2.2 Policy – Character</p> <p>(a) Ensure residential development in the Residential Zone:</p> <ul style="list-style-type: none"> (i) Provides road patterns that follow the natural contour of the landform; (ii) Promotes views and vistas from public spaces of the hinterland beyond; and (iii) Is an appropriate scale and intensity, and setback from the road frontages to provide sufficient open space for the planting of trees and private gardens. <p>4.2.8 Policy – Excessive building scale</p> <p>Facilitate quality development by ensuring buildings are a complementary height, bulk and form for the site, and are in keeping with the amenity values of the street.</p> <p>4.7 Urban Subdivision and development Layout and Design</p> <p>4.7.2 Policy – Subdivision location and design</p> <p>(a) Ensure subdivision, is located and designed to:</p> <ul style="list-style-type: none"> (i) Be sympathetic to the natural and physical qualities and characteristics of the surrounding environment; (ii) Establish boundaries that avoid buildings and structures dominating adjoining land or public places, the coast, or fresh waterbodies;

<ul style="list-style-type: none"> (v) Providing opportunities for affordable housing, through flexible controls on design and density of tiny houses. (vi) Retaining clear South and West views of the harbour, coast and mountain from Bow Street between Norrie Avenue and Bankart Street through subdivision and building design (vii) Retaining shared views of the harbour, coast and mountain from other streets and public places through design of subdivision and through building setbacks and height controls. 	<p>compromise the character of the town centre, hence the addition of clause (iv). Acknowledge that generally higher densities are located in and around town centres close to services/facilities and infrastructure.</p> <p>Reference to affordable housing can be removed and replaced with provide opportunities for 'diverse' housing – provision for tiny houses needs to be investigated further</p> <p>Notified provisions already cover most aspects. Clause (vi) and (vii) could be added to</p> <p>One submitter commented that this policy conflates special character with landscape values and affordable housing.</p>	<p>(iii) Arrange allotments to allow for view sharing, where possible;</p> <p>4.7.3 Policy – Residential subdivision (a) Development responds to the outcomes of Waikato District Council's Urban Design Guidelines Residential Subdivision (Appendix 3.1), section 4 (Connectivity and Movement Networks), section 5 (Neighbourhood Character), section 6 (Residential Block and Street Layout), section 7 (Open Space and Landscape Treatment), and section 8 (Low Impact Urban Design), in particular by: (xi) Ensuring design promotes local characteristics; (xii) Ensuring lots are orientated in a way that:</p> <p>B. Addresses the street frontage and public places. (xiii) Creating lots that can accommodate a variety of density with a mix of usable lot types;</p> <p>.</p>
<p>4.8.3.2 Policy – Raglan Town Centre</p> <p>(a) Development maintains and enhances the role of the Raglan Town Centre by:</p> <p><u>(vi) Focusing retailing activities along Bow Street and Wainui Road with new development on these streets designed to:</u></p> <p><u>A. Appear small in scale (one or two storeys);</u></p> <p><u>B. Contain active frontages and transparent facades at street level; and</u></p> <p><u>C. Generally build out to the street boundary.</u></p>	<p>Possibly should remain under Town Centre provisions – might be a better fit there.</p> <p>Text underlined is from Raglan character statement and added to the notified policy 4.8.3.2 as per my s42A report - in the event the Raglan character statement is removed and items are to be included in other parts of the District Plan</p>	<p>4.8.3.2 Policy – Raglan Town Centre</p> <p>(a) Development maintains and enhances the role of the Raglan Town Centre by:</p> <ul style="list-style-type: none"> (i) Maintaining wide footpaths and high quality public space, prioritising and providing for pedestrian movement and safety; (ii) Maintaining a pedestrian focus by discouraging vehicle access across footpaths; (iii) Maintaining built form framing views towards Raglan Harbour; (iv) Providing for a building height and scale appropriate to the town centre; and (v) Protecting and enhancing the character of existing buildings through new built form being sympathetic to the existing main street built form and the surrounding context, whilst still promoting the eclectic and artistic nature existing character of the town being consistent with the outcomes of the Town Centre Character Statement for Raglan Town Centre (Appendix 10.1), in particular by:

		<ul style="list-style-type: none"> A. Promoting traditional roof forms (hipped or gable ends) and symmetry through window design and placement; B. Providing continuous post supported verandahs sheltering footpaths; C. Promoting recessed shop fronts; D. Providing parking, loading and storage where rear access to buildings exists; E. Promoting active street frontages by developing up- to-the-street boundaries; F. Reinforcing the street corners by ensuring the design is two storey and is transparent on both sides of the street corner; and G. Encouraging the preservation and promotion of cultural features.
<p>4.8.3.3 Policy – Locally Important Public Views</p> <ul style="list-style-type: none"> (a) Manage development on sites within the viewshafts to avoid adverse physical and visual effects on locally important public viewshafts, including adverse cumulative effects on the viewshafts (b) Retain public access to the viewing point where the locally important viewshafts originate. 	<p>This policy is added to preserve identified viewshafts. It would be best if these views were spatially defined to help with implementation. Also, would need to understand the extent of people impacted by the amendments.</p> <p>Add the following points to this policy – originally from Policy 4.8.3.1 (above):</p> <ul style="list-style-type: none"> (i) Retain clear South and West views of the harbour, coast and mountain from Bow Street between Norrie Avenue and Bankart Street through subdivision and building design (ii) Retain shared views of the harbour, coast and mountain from other streets and public places through design of subdivision and through building setbacks and height controls. <p>One submitter took issue with the protection of views if the views were not defined and not considered in the context of s6 RMA.</p>	<p>4.2.2 Policy – Character</p> <ul style="list-style-type: none"> (a) Ensure residential development in the Residential Zone: (ii) Promotes views and vistas from public spaces of the hinterland beyond; and (iii) Is an appropriate scale and intensity, and setback from the road frontages to provide sufficient open space for the planting of trees and private gardens.

<p>Policy 4.8.3.4 – Affordable Housing</p> <p>(a) Provide opportunities for an increase in housing supply, variety and choice by creating well-designed residential developments comprising a range of housing densities, typologies, and price options.</p>	<p>Creating a variety of housing options doesn't just provide for affordable housing. Notified obs and pols already seek diverse housing options, however the notified provisions don't necessarily provide for diverse housing options.</p>	<p>4.2.17 Policy – Housing types</p> <p>(a) Enable a variety of housing types in the Residential Zone where it is connected to public reticulation, including:</p> <p>(i) Integrated residential development such as low-rise apartments and multi-unit development;</p> <p>(ii) Retirement villages.</p>
<p>4.8.4 RULES</p> <p>(1) The rules that apply to activities in the Raglan Special Character Area are contained in Rule 9.5.4.1 Land Use – Building and Rule 9.5.4.2 Subdivision.</p> <p>(2) The activity status tables and standards in the following chapters also apply to activities in the Raglan Special Character Area:</p> <p style="margin-left: 40px;">(a) 15 Natural Hazards</p> <p style="margin-left: 40px;">(b) 16 Residential Zone</p> <p style="margin-left: 40px;">(c) 17 Business Zone</p> <p style="margin-left: 40px;">(d) 18 Business Town Centre Zone</p> <p>(3) The following symbols are used in the tables:</p> <p style="margin-left: 40px;">(a) P Permitted activity</p> <p style="margin-left: 40px;">(b) RD Restricted discretionary activity</p>	<p>In consideration of the notified structure, possibly need to add these rules into the relevant zone rules although I think its tidier having all of the provisions that relate to the RSCA in the same place.</p>	
<p>4.8.4.1 Land Use - Building</p> <p>4.8.4.1.1 Building Mix</p> <p>PI</p> <p>(a) Any new building must be different in terms of architectural style, massing, cladding and colour from neighbouring houses and 3 nearest houses across the street.</p>	<p>This is quite subjective depending on who is assessing the rule – might be better left as a policy or needs more objective measures</p> <p>As written this rule will be difficult to implement.</p>	

<p>RDI</p> <p>(a) A building that does not comply with Rule 4.8.4.1.1 PI</p> <p>(b) Councils discretion shall be restricted to the matters listed in Standard 4.8.5</p>		
<p>4.8.4.1.2 Affordable Housing - Tiny Houses</p> <p>PI</p> <p>(a) Despite Rule 16.3.1, one dwelling plus one tiny house contained within a site must comply with all of the following conditions:</p> <ul style="list-style-type: none"> (i) The site does not contain a Multi-unit development (ii) The site does not contain a minor dwelling development unless the net site area is 900m² or more (iii) The gross floor area shall not exceed 30m² (iv) The tiny house is a maximum of 5m high; (v) The tiny house is set back at least 3m from any other building and 5m from a road boundary (vi) all other zone building rules are complied with. <p>RDI</p> <p>(a) A building that does not comply with Rule 4.8.4.1.2 PI</p> <p>(b) Councils discretion shall be restricted to those matters listed in Standard 4.8.5</p>	<p>An infrastructure study to determine viability of development provided for in the following rule has not been undertaken but will need to be investigated before the rules could be supported</p> <p>Would need to add definition of Tiny house which means 'small residential unit not exceeding 30m²'. If definition includes size of house could remove from rule.</p>	
<p>9.5.4.1.3 Affordable Housing – Duplexes</p> <p>PI</p> <p>(a) Despite Rule 16.1.3, two dwellings contained within a site must comply with all of the following conditions:</p> <ul style="list-style-type: none"> (i) The site does not contain a Multi-unit development, a minor dwelling or a tiny house (ii) The dwellings are joined in a single building 	<p>Without further investigation these provisions are not supported.</p> <p>Would need to add definition of duplex</p>	

RDI

- (a) A building that does not comply with Rule 4.8.4.1.3 P1,
- (b) Councils discretion shall be restricted to the following matters:
 - (i) matters listed in Standard 4.8.5, and

whether the building has the general bulk, location and overall appearance (when viewed from the road and public places) of a single stand-alone dwelling

<p>9.5.4.1.4 Density – Medium Density Defined Areas</p> <p>(a) Despite Rule 16.1.3, one dwelling per 200m² contained within a site must comply with all of the following conditions:</p> <ul style="list-style-type: none"> (i) The site is within a defined high density growth area; (ii) The site does not contain a Multi-unit development (iii) Every dwelling must have an outdoor living court that: <ul style="list-style-type: none"> • is directly accessible from the dwelling; and • is free of buildings, parking spaces, servicing and manoeuvring areas; and • where located at ground level is at least 20m² and has no dimension less than 4m and has a gradient not exceeding 1 in 20; or <p>where provided on a balcony or roof terrace is at least 5m² and has a minimum dimension of 1.8m</p> <p>RDI</p> <ul style="list-style-type: none"> (a) A building that does not comply with Rule 4.8.4.1.4 P1 (b) Councils discretion shall be restricted to the following matters: <ul style="list-style-type: none"> (i) matters listed in Standard 4.8.5, and (ii) XXX 	<p>Outdoor living court requirements taken from Auckland Unitary Plan THAB Zone standard H6.6.15. Outdoor living space (simplified wording)</p> <p>Rules relating to development within identified higher density areas are subject to investigations for appropriate higher density areas within the district and these standards will need to align with relevant standards decided by the Panel.</p>	<p>Ensure multi-unit residential subdivision and development is designed in a way that:</p> <ul style="list-style-type: none"> (i) provides a range of housing types; (ii) Addresses and integrates with adjacent residential development, town centres and public open space; (iii) Addresses and responds to the constraints of the site, including typography, natural features and heritage values; (iv) Supports an integrated transport network, including walking and cycling connections to public open space network; (v) Maintains the amenity values of neighbouring sites. <p>(b) Encourage developments that promote the outcomes of the Waikato District Council’s multi-unit development urban design guidelines (Appendix 3.4), in particular section 3 (site and context analysis), section 4 (movement, access and parking), section 5 (neighbourhood character), section 6 (street and public realm interface), and section 8 (communal open spaces and landscape treatment), in particular by:</p> <ul style="list-style-type: none"> (i) Responding to the immediate urban and built form; (ii) Designing and locating development to support connection to the surrounding context and local amenities; (iii) Promoting the safe movement of pedestrians and vehicles on-site; (iv) Ensuring design is contextually appropriate and promotes local characteristics to contribute to community identity; (v) Designs that respond to and promote the public interface by the provision of: <ul style="list-style-type: none"> A. Streets and public places; B. Pedestrian safety and amenity; C. Side setbacks; and D. Variation in roof form.
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		(vi) Ensuring a communal outdoor living court is provided where private individual outdoor living courts are limited.
<p>4.8.4.2 Subdivision 4.8.4.2.1 Subdivision – Medium Density Areas</p> <p>Despite Rule 16.4.1(a)(i), Rule 16.4.11 & Rule 16.4.12,</p> <ul style="list-style-type: none"> (a) every proposed lot must have a minimum net site area of 200m²; (b) The site is within a defined high density growth area; (c) building coverage does not exceed 55%; (d) every proposed lot is capable of containing a rectangle with an area equal to half the area of the lot where the longer sides are no greater than twice the length of the shorter sides; (e) every proposed lot that has frontage to a public road has a minimum of 10m frontage. (f) A building that does not comply with Rule 4.8.4.2.1 PI (g) Councils discretion shall be restricted to the following matters: <ul style="list-style-type: none"> (i) matters listed in Standard 4.8.5, (ii) Subdivision layout; (iii) Shape of allotment; (iv) Ability of allotment to accommodate a practical building platform; (v) Likely location of future buildings and their potential effects on the environment; (vi) Avoidance or mitigation of natural hazards; (vii) Geotechnical suitability for building; and (viii) Ponding areas and primary overland flow paths. 	<p>Rules relating to development within identified higher density areas are subject to investigations for appropriate higher density areas within the district – otherwise these provisions are not supported</p>	
<p>4.8.5 MATTERS OF DISCRETION</p>	<p>The additional matters will not affect buildings that exceed density or height controls as these are full discretionary</p>	

<p>In addition to those matters of discretion within the relevant zone rules, the Council will restrict its discretion to the following matters when assessing a restricted discretionary resource consent application in the Raglan Special Character Area.</p> <p>(1) For new buildings in the Raglan Special Character Area:</p> <ul style="list-style-type: none"> (a) the effects on the streetscape and special character context; (b) the building and its effects on Raglan character; including its design, quality, purpose and amenities including matters of appearance, scale, form, massing, materials, setbacks and the relationship to the street; and (c) the effects on landscape and vegetation; (d) permitted activity conditions not complied with and matters of control <p>(2) For new buildings, or existing buildings where the bulk of the building is increased, that intrude into a locally important public view:</p> <ul style="list-style-type: none"> (a) effects on the visual integrity of the view from the identified viewing point; (b) location, nature, form and extent of proposed works, including height and setbacks; (c) the functional need or operational need for the proposal and any alternatives considered to fulfil that need without the intrusion into the view 	<p>activities. The new policies (above) will guide assessment of the discretionary activities, with a similar outcome.</p> <p>One submitter felt that further work was needed to flesh out the matters of discretion and where necessary target those to the individual matters that will assist in achieving the outcomes pertaining to special character</p>	
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INTRODUCTION

CONTENT	Council Comment
<p>4.8.1 INTRODUCTION</p> <p>Character is a distinctive combination of attributes that give an area its identity. Character describes the 'look and feel' of a landscape, neighbourhood or area through the analysis of natural, physical and cultural qualities and attributes. There are specific characteristics and attributes which contribute to the special character of Raglan and its surrounds.</p> <p>The provisions within this chapter are designed to ensure that Raglan's character is recognised and enhanced during growth and expansion of the township. The provisions are specific to the 'Raglan Special Character Area' which includes all land within the Business, Business Town Centre and Residential Zones (excluding residential zoned land within the Rangitahi Peninsula Area). The provisions within this chapter are to be read in conjunction with the relevant district-wide provisions contained elsewhere in this plan.</p>	<p>Acknowledge that the notified plan does not include an introduction to chapters and that the Panel have expressed that unnecessary information in the Plan will be trimmed. I think the Introduction helps to provide context to the provisions – could be more concise but also note this information can be contained within the provisions themselves if this is preferred by the Panel.</p> <p>The Panel have directed that the RSCA does not need to be mapped as it includes all urban areas within Raglan. Submitters would like this included as it is helpful to the end user.</p>
<p>4.8.1.1 Location</p> <p>Raglan is a small west-coast harbour town located approximately 48km west of Hamilton, in the western reaches of the Waikato District. The primary access road into Raglan is State Highway 23 (SH23) which is the main transport connection between Raglan and the closest city of Hamilton.</p>	
<p>4.8.1.2 Settlement</p> <p>The population of Raglan has grown at key points in the history of the township, most notably with the improvement of roading infrastructure to Hamilton in the 1960's. In 2020 the population is around 3,500 residents (3,279 in the June 2018 Census), however this number swells in peak months due to baches and AirBNB properties. There is a high proportion of unoccupied baches outside of the main tourist summer season.</p> <p>The settlement is located on a series of peninsulas. The CBD of the township is on the western edge of the largest peninsula with a series of vehicular and pedestrian causeways and bridges providing connections between the main urbanised areas. In 2020 Rangitahi Peninsula to the south of the township is in the early stages of development for a new residential neighbourhood of up to 450 homes, which will be the largest single extension to the residential area of Raglan. Residential neighbourhoods and communities are generally located and designed to</p>	

<p>take advantage of views and connections to the harbour and to the surrounding landscape.</p> <p>Commercial and employment areas are spread throughout the urban area of Raglan, along Bow Street, at the old historic wharf and at the Nau Mai Road industrial area, off SH 23.</p>	
	<p>I have added this comment here to tell the audience that there are important local views which justifies proposed provisions below which seek to protect viewshafts in Raglan. Viewshafts have been described (as below) by submitters, however, none of the viewshafts have been spatially defined.</p> <p>A definition for ‘Locally Important Viewshafts’ would need to be added which means:</p> <p><i>Viewshafts to the harbour, coast and natural backdrops, including Mount Karioi, from public places which contribute to the unique character of Raglan and includes the following viewshafts:</i></p> <ul style="list-style-type: none"> • <i>from SH23 (north of Maungatawhiri Rd) to Kaitoke Creek</i> • <i>all existing views of the bar from Main Road, Bow St and Norrie Avenue</i> • <i>all existing views of Karioi from Raglan CBD</i> • <i>from Wainui Rd to the coast between the Bryant Reserve and the Bible Crusade Camp</i> • <i>from SH23 summit to Karioi</i> • <i>AroAro salt marsh from Wallis St</i>
<p>4.8.1.3 Context</p> <p>Mount Karioi, Whaingaroa, the rugged west coast headlands and coastline and the surrounding rural context are all important features within the setting of Raglan. Views and connections to the harbour and the coast and the relaxed nature of the township contribute to the look and feel of the area.</p> <p>Raglan's coastal setting provides a sense of identity at the local level. Individual viewing points, and their locally important viewshafts from public places, contribute to the unique character of many of Raglan's neighbourhoods and coastal areas. Although many local views are naturally self-preserved by topography or proximity to the coast and require no specific protective restrictions, some are in prominent public locations but could be obstructed by buildings occurring in the foreground.</p> <p>The wider rural context is predominantly used for pastoral farming and forestry, it is interspersed with blocks of native bush and tourist attractions which contribute to the character of Raglan.</p>	<p>A submitter suggested a possible amendment. I consider tourist attractions in Raglan do form part of the character but open to further suggestions/alternative wording.</p>

<p>4.8.1.4 Key characteristics and attributes that contribute to Raglan's character</p> <ul style="list-style-type: none"> (a) The strong visual and physical relationship between the township and the harbour, the coast and Mount Karioi. (b) The outward facing nature of the underlying landforms. (c) The arrangement and layout of the township across peninsulas connected by causeways and bridges. (d) The sinuous tree-lined coastal edge formed by the peninsulas, providing extensive access to the harbour within the township. (e) The human scale of development in Raglan township which provides a sense of openness within the settlement. (f) The 'bowl' like topography in which both Raglan township and Whaangaroa are set, with rising landform to the north, east and west separating the catchment from other parts of the Waikato District. (g) The relaxed and informal character of the settlement developed over years through limited development pressure and the laid-back community and residents. 	<p>Added this into the Intro to add context to provisions. If the Panel prefers, this can be included as a policy instead.</p>
<p>4.8.1.5 Growth</p> <p>Future Proof 2017 and The Waikato District Council Development Strategy (Waikato 2070) guides the growth in the district over the next 50 years by informing future planning, investment and decision making. To support future growth, this strategy sets a development pattern for the district, including identifying specific growth areas and timings (subject to further investigation and feasibility).</p> <p>Several growth areas have been identified to support this growth; land along Main Road and the Rangitahi Peninsula that is already zoned for residential activities is anticipated to be developed within the short-term (between 1-10 years), and additional land along Oporu and Te Hutewai Roads proposed to be developed in the long-term (10-30 years) subject to rezoning of those parcels of land.</p>	
<p>4.8.1.6 Development Challenges</p> <p>Raglan faces the following development challenges, which in some cases are different to development challenges in other towns within the district:</p> <ul style="list-style-type: none"> • Responding to growth and change • Impact of high visitor numbers • Housing and affordability 	

<ul style="list-style-type: none">• More people coming to live there or wanting to live here and new housing developments• Pressure on infrastructure; sewerage, one lane car-bridge, rubbish and parking• Impact on our environment• Loss of Raglan Identity• Planning for climate change• Land availability• Topography of land constrains development• Absence of Structure Plan for the Raglan area.	
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VERSION 2: DRAFT PROVISIONS

DRAFT PROVISIONS (New text in red)	SUBMITTER COMMENT
<p>RAGLAN SPECIAL CHARACTER AREA Chapter 4: Urban Environment 4.8: Raglan Special Character Area</p> <p>The provisions within this chapter are specific to the Raglan Special Character Area which includes all land within the Business, Business Town Centre and Residential Zones (excluding residential zoned land within the Rangitahi Peninsula Area).</p> <p>The provisions within this chapter are to be read in conjunction with the relevant district-wide provisions contained elsewhere in this plan.</p>	
<p>4.8.1 OBJECTIVES</p> <p>To be read in conjunction with other relevant objectives in [Proposed Plan] Section B.</p> <p>4.8.1.1 Objective – Raglan Special Character Area</p> <p>(a) The key characteristics and attributes that define, contribute to, or support the Raglan Special Character Area are not compromised by incompatible development.</p>	
<p>4.8.2 POLICIES</p> <p>To be read in conjunction with other relevant policies in [Proposed Plan] Section B.</p> <p>4.8.2.1 Policy – Raglan Town Centre</p> <p>(a) Development maintains and enhances the role of the Raglan Town Centre by:</p> <ul style="list-style-type: none"> (i) Maintaining wide footpaths and high quality public space, prioritising and providing for pedestrian movement and safety; (ii) Maintaining a pedestrian focus by discouraging vehicle access across footpaths; (iii) Maintaining built form framing views towards Raglan Harbour; (iv) Providing for a building height and scale appropriate to the town centre; and (v) Protecting and enhancing the character of existing buildings through new built form being sympathetic to the existing main street built form and the surrounding context, whilst still promoting the eclectic and artistic nature existing character of the town being consistent with the outcomes of the Town Centre Character Statement for Raglan Town Centre (Appendix 10.1), in particular by: 	

<p>A. Promoting traditional roof forms (hipped or gable ends) and symmetry through window design and placement;</p> <p>B. Providing continuous post supported verandahs sheltering footpaths;</p> <p>C. Promoting recessed shop fronts;</p> <p>D. Providing parking, loading and storage where rear access to buildings exists;</p> <p>E. Promoting active street frontages by developing up- to-the-street boundaries;</p> <p>F. Reinforcing the street corners by ensuring the design is two storey and is transparent on both sides of the street corner; and</p> <p>G. Encouraging the preservation and promotion of cultural features.</p> <p>(vi) Focusing retailing activities along Bow Street and Wainui Road with new development on these streets designed to:</p> <p>A. Appear small in scale (one or two storeys);</p> <p>B. Contain active frontages and transparent facades at street level; and</p> <p>C. Generally build out to the street boundary.</p>	
<p>4.8.2.2 Policy – Public Views</p> <p>(a) Manage development on sites to avoid adverse physical and visual effects on locally important public viewshafts, including adverse cumulative effects on the viewshafts</p> <p>(b) Retain clear South and West views of the harbour, coast and mountain from Bow Street between Norrie Avenue and Bankart Street through subdivision and building design</p> <p>(c) Retain shared views of the harbour, coast and mountain from streets and public places through design of subdivision and through building setbacks and height controls.</p> <p>A definition for ‘Locally Important Viewshafts’ would need to be added which means:</p> <p><i>Viewshafts to the harbour, coast and natural backdrops, including Mount Karioi, from public places which contribute to the unique character of Raglan and includes the following viewshafts:</i></p> <ul style="list-style-type: none"> • <i>from SH23 (north of Maungatawhiri Rd) to Kaitoke Creek</i> • <i>all existing views of the bar from Main Road, Bow St and Norrie Avenue</i> • <i>all existing views of Karioi from Raglan CBD</i> • <i>from Wainui Rd to the coast between the Bryant Reserve and the Bible Crusade Camp</i> 	

<ul style="list-style-type: none"> • from SH23 summit to Karioi • AroAro salt marsh from Wallis St 	
<p>4.8.3 MATTERS OF DISCRETION</p> <p>In addition to those matters of discretion within the relevant zone rules, the Council will restrict its discretion to the following matters when assessing a restricted discretionary resource consent application in the Raglan Special Character Area.</p> <p>(1) For new buildings in the Raglan Special Character Area:</p> <ul style="list-style-type: none"> (a) the effects on the streetscape and special character context; (b) the building and its effects on Raglan character; including its design, quality, purpose and amenities including matters of appearance, scale, form, massing, materials, setbacks and the relationship to the street; and (c) the effects on landscape; (d) permitted activity conditions not complied with and matters of control <p>(2) For new buildings, or existing buildings where the bulk of the building is increased, that intrude into a locally important public view:</p> <ul style="list-style-type: none"> (a) effects on the visual integrity of the view from the identified viewing point; (b) location, nature, form and extent of proposed works, including height and setbacks. 	

APPENDIX D
FEEDBACK FROM SUBMITTERS & FURTHER SUBMITTERS OF
HEARING 16

1) CAROLYN MCALLEY OF HERITAGE NEW ZEALAND (EMAIL DATED 10 DECEMBER 2020):

Kia ora Summer

Carolyn here from HNZPT. Thank you for the opportunity to comment, however in this instance HNZPT has no comment on this additional material related to the special character of the Raglan urban area.

Kind regards,

Carolyn McAlley

2) AARON MOOAR (EMAIL DATED 13 DECEMBER 2020):

Hi Summer

Thanks for your work on this. My reaction to the commentary/advice you have received is below with the response you specifically asked for below that.

I appreciate the desire to make the provisions more palatable to the Panel but feel that too much has been lost between version 1 and 2. I'd like to find a middle ground that tries to deal with some of the issues raised in the additional comments because as it stands version 2 deals with a very small amount of the issues raised by submitters. If you see something that is going to cause huge problems in that regard let me know.

It seems like there aren't sufficient staff resources to do the work required to resolve all the issues raised here (you're already working this weekend as it is) but would like to get a few more issues covered, if only at the policy level, so that we can at least achieve something.

I would also add on a personal note that the continued worsening of the housing crisis through the time of this district plan review means the issue of affordability has taken on increased importance. The term came into the Raglan Special Character work because of a 'lack of development pressure' being highlighted as a Raglan characteristic but I now believe we all have a moral obligation to do everything we can to improve the situation - a situation which I know to be a constant source of anguish for people in my community.

I'm aware that this perspective and turn of phrase isn't the norm for a district planning process but I would argue these are not normal times and that new approaches are needed urgently. On the other hand looking after community well being is part of the council's role so maybe it's not that outlandish.

Below are my responses to the comments in version 1 of the provisions

4.8.3.2 Comment: "consider the notified objective 4.2.16 & associated policy 4.2.17 cover off this aspect without the need to add any additional provisions."

My comment: 4.2.16 and 4.2.17 do not mention affordability or words of similar meaning. The nearest terms are "options" and "variety" which are too generalised and/or poorly defined to ensure affordability.

Whaingaroa Raglan Affordable Housing Project provided evidence to this district plan process that the housing market (at the time of submission) only served the top 25% of income earners. With the further increase in property values this percentage is probably smaller.

Without the term "affordable" or "affordability" (and associated rules) - it will not be possible to retain the characteristics of low development pressure mentioned in the Isthmus Report.

4.8.3.2 Comment B: the name of the objective is incorrect if the promotion of diverse housing is the objective— providing diverse housing options will result in diverse communities (which provides opportunities for more affordable housing). 'Housing Options' is a more accurate name..

My comment: The promotion of diverse housing is not the objective of this particular policy. Promotion of diverse housing or "Housing Options" should be a separate policy - especially since diversity in built form has been highlighted as a characteristic of Raglan.

I also question the assumption that providing "diverse" housing options will lead to affordable housing. While it's possible that it could do this the term is once again, far too generalised to ensure the outcome will be achieved.

Page 1 of the pdf document asking for this feedback identifies 6 different focus areas of Raglan Character:

- 1) building mix
- 2) affordable housing;
- 3) density;
- 4) views;
- 5) building typology and scale of development;
- 6) appropriate location of medium density development.

This indicates that our own process has also made a distinction between affordability and building mix/diversity.

4.8.3.2 Comment C: This submitter also acknowledged the challenges other Councils have faced dealing with the creation of affordable housing through the use of District Plan provisions in isolation from other organisations, mechanisms and incentives.

My Comment: The Waikato Regional Housing Initiative has been formed specifically to deal with housing affordability in our Region and have been in discussion with Central Government. In Raglan we have the Whaingaroa Raglan Affordable Housing Project who have submitted to this district plan. This district plan process is the ideal time to work with these organisations on this issue.

I note that Councils in Christchurch and Queenstown Lakes have policies on housing affordability. There are obvious parallels between Queenstown and Raglan with similar levels of AirBnB development and consequent difficulties in finding worker accommodation.

I would also note that I submitted on the issue of long term accommodation being supplanted by the short term holiday rentals but that it seems to have fallen through the cracks of this process.

I acknowledge that this issue is challenging but that is not a reason to put it aside.

4.8.3.1 Policy – Residential Subdivision & Development

Instead of deleting this section can we attend to the issues raised in the comments?

A comment suggests (i) and (ii) need specific rules to be effective. I agree so can we put some rules in? Alternatively if there is a staff resourcing issue I would argue it's better to have the policy by itself than have nothing at all.

I agree that (iii) is dealt with elsewhere.

(iv) I agree we have not provided much clarity on the issue of where to put medium density housing so make this suggestion: There are schools of thought in urban design that communities should have more than one service centre (which is already happening in the Rangitahi Zone). This would resolve the issue of keeping high density living outside of the 'old' Raglan, it would also be a solution to community disquiet around the perceived overload in the current CBD.

(v) Suggest wording: "Providing opportunities for affordable housing, through flexible controls on design, density and floor area of house." I agree tiny homes need more investigation but want the retention of the term affordable. As discussed above, affordability and diversity are 2 different issues - as evidenced by the many communities with high built diversity and low affordability around NZ.

4,8,3,1 Comment: One submitter commented that this policy conflates special character with landscape values and affordable housing.

My comment: The Isthmus report and community consultation has highlighted lack of development pressure as a characteristic of Raglan. We have been working on the basis that ensuring affordability will allow this characteristic to be retained. Views of the landscape and a strong relationship with it are important to the Raglan Community. This may or may not be conflating landscape values with Special characteristics but it is clearly a strong local value.

8.4.1.2 Affordable Housing - Tiny House and 9.5.4.1.3 Affordable Housing – Duplexes

Agree that more investigation is required.

APPENDIX D

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<p>4.8.1 OBJECTIVES</p> <p>To be read in conjunction with other relevant objectives in [Proposed Plan] Section B.</p> <p>4.8.1.1 Objective – Raglan Special Character Area</p>	<p>Characteristics (b) & (c) were deleted on the grounds that 4.8.3.1 covered this but 4.8.3.1 has also been deleted. One or the other needs to be returned and if it is this section then I suggest (b)(ii) remove the words randomness and diverseness and replace them with something less subjective - perhaps "diversity of built</p>

<p>(a) The key characteristics and attributes that define, contribute to, or support the Raglan Special Character Area are not compromised by incompatible development.</p>	<p>form and materials" is better</p>
<p>4.8.2 POLICIES</p> <p>To be read in conjunction with other relevant policies in [Proposed Plan] Section B.</p> <p>4.8.2.1 Policy – Raglan Town Centre</p> <p>(a) Development maintains and enhances the role of the Raglan Town Centre by:</p> <ol style="list-style-type: none"> 1. (i) Maintaining wide footpaths and high quality public space, prioritising and providing for pedestrian movement and safety; 2. (ii) Maintaining a pedestrian focus by discouraging vehicle access across footpaths; 3. (iii) Maintaining built form framing views towards Raglan Harbour; 4. (iv) Providing for a building height and scale appropriate to the town centre; and 5. (v) Protecting and enhancing the character of existing buildings through new built form being sympathetic to the existing main street built form and the surrounding context, whilst still promoting the eclectic and artistic nature existing character of the town being consistent with the outcomes of the Town Centre Character Statement for Raglan Town Centre (Appendix 10.1), in particular by: 	<p>Good to have policy, but rules are needed too.</p> <p>iii) Simplify to: Maintaining views towards Raglan Harbour.</p>
<ol style="list-style-type: none"> 1. Promoting traditional roof forms (hipped or gable ends) and symmetry through window design and placement; 2. Providing continuous post supported verandahs sheltering footpaths; 3. Promoting recessed shop fronts; 4. Providing parking, loading and storage where rear access to buildings exists; 5. Promoting active street frontages by developing up-to-the-street boundaries; 6. Reinforcing the street corners by ensuring the design is two storey and is transparent on both sides of the street corner; and 7. Encouraging the preservation and promotion of cultural features. <p>(vi) Focusing retailing activities along Bow Street and Wainui Road with new</p>	<p>F. The Harbourview Hotel and 2 corner cafes at the intersection of Bow St and Wainui Rd are the most iconic part of the CBD. The community would be reluctant to see development encouraged at these sites and there would be no gains in terms of the public space by having two storey buildings where the 2 cafes are currently located.</p> <p>I would suggest F be applied to any intersections that form the entrance to the CBD (e.g. by the roundabouts).</p> <p>Is the red C covered by E?</p>

<p>development on these streets designed to:</p> <ol style="list-style-type: none"> 1. Appear small in scale (one or two storeys); 2. Contain active frontages and transparent facades at street level; and 3. Generally build out to the street boundary. 	
<p>4.8.2.2 Policy – Public Views</p> <ol style="list-style-type: none"> 1. (a) Manage development on sites to avoid adverse physical and visual effects on locally important public viewshafts, including adverse cumulative effects on the viewshafts 2. (b) Retain clear South and West views of the harbour, coast and mountain from Bow Street between Norrie Avenue and Bankart Street through subdivision and building design 3. (c) Retain shared views of the harbour, coast and mountain from streets and public places through design of subdivision and through building setbacks and height controls. <p>A definition for ‘Locally Important Viewshafts’ would need to be added which means:</p> <p><i>Viewshafts to the harbour, coast and natural backdrops, including Mount Karioi, from public places which contribute to the unique character of Raglan and includes the following viewshafts:</i></p> <ul style="list-style-type: none"> • from SH23 (north of Maungatawhiri Rd) to Kaitoke Creek • all existing views of the bar from Main Road, Bow St and Norrie Avenue • all existing views of Karioi from Raglan CBD • from Wainui Rd to the coast between the Bryant Reserve and the Bible Crusade Camp • from SH23 summit to Karioi 	<p>b) also include views north to Te Horea and pā sites.</p> <p>Generally speaking; rules to enforce these policies would be helpful</p> <p>Can we have maps to denote the viewshafts</p>

- *AroAro salt marsh from Wallis St*

4.8.3 MATTERS OF DISCRETION

In addition to those matters of discretion within the relevant zone rules, the Council will restrict its discretion to the following matters when assessing a restricted discretionary resource consent application in the Raglan Special Character Area.

1. (1) For new buildings in the Raglan Special Character Area:
 1. (a) the effects on the streetscape and special character context;
 2. (b) the building and its effects on Raglan character; including its design, quality, purpose and amenities including matters of appearance, scale, form, massing, materials, setbacks and the relationship to the street; and
 3. (c) the effects on landscape;
 4. (d) permitted activity conditions not complied **with and matters of control**
2. (2) For new buildings, or existing buildings where the bulk of the building is increased, that intrude into a locally important public view:
 - (a) effects on the visual integrity of the view **from the identified viewing point;**

(b) location, nature, form and extent of proposed works, including height and setbacks.

3) GABRIELLE PARSON OF RAGLAN NATURALLY (EMAIL DATED 14 DECEMBER 2020):

Hi Summer and Fletcher,

Thank you for giving us the opportunity to provide further feedback on the development of the provisions. I haven't been able to give it the time that I would have liked, to go through it thoroughly. It's a tricky time of the year to be getting my head into this detail, to be honest!

I have had a look over and am generally happy with the proposed changes. I am sure lots of work has gone into it by the team and I do trust that at the end of day it has all been worthwhile and that the Special Character of Raglan has been further protected through the District Plan.

A couple of questions I had were:

On Pages 9 and 10 of the report and highlighted in bold below. Is this something that Brad has been able to do - or will do?:

Miscellaneous matters noted

- “Matters agreed” items in paper circulated confirmed, except no consensus on whether to remove or replace existing CBD character provisions
- Future rezoning of greenfield areas for urban development, as shown in Waikato 2070 – discussion of difficulties of extending character provisions there – issue will be brought to attention of hearings panel.
- The Isthmus report could be developed further to include more on building typology and scale.

Add two more issues for Raglan character: 5. building typology and scale of development • Larger buildings should be discouraged, especially close together • Brad to develop ideas around building typology and scale

On Page 11 of the Report in the minutes I highlighted once point in bold below. Would it be possible to go through a development (real or possible) as a final check?

Draft Rules • Further consideration of rules needed, short timeframe noted. • Could go through an actual development to check the triggers • Decide whether design guide should be retained • Precincts, as in Auckland could be considered to over-ride zone standards • Car-parking requirements need to be reviewed in light of NPS-UPS

I am sorry I couldn't be more helpful at this time.

Kind regards,

Gabrielle

Raglan Naturally Coordinator

021 844 785

4) JOHN LAWSON OF WED (EMAIL DATED 11 DECEMBER 2020):

Dear Summer

Thank you for that work. Here's WED's comments -

A lot of what is in Appendix C is missing from Appendix D. In particular, the proposed promotion of affordable housing is missing, despite the Waikato Regional Housing Initiative being ready to go and just waiting for rules to be put in place.. 4.2.16 & 4.2.17 merely describe the housing situation. They don't promote affordable housing. WED does not accept that the provisions about design, building mix and aspects of affordable housing should be omitted because rules and definitions have not been developed. Rather, they should be developed and WED is willing to work further on them.

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<p><i>4.8.1 OBJECTIVES</i></p>	<p>agree</p>

<p>To be read in conjunction with other relevant objectives in [Proposed Plan] Section B.</p> <p>4.8.1.1 Objective – Raglan Special Character Area</p> <p>(a) The key characteristics and attributes that define, contribute to, or support the Raglan Special Character Area are not compromised by incompatible development.</p>	
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<ol style="list-style-type: none"> 1. Promoting traditional roof forms (hipped or gable ends) and symmetry through window design and placement; 2. Providing continuous post supported verandahs sheltering footpaths; 3. Promoting recessed shop fronts; 4. Providing parking, loading and storage where rear access to buildings exists; 5. Promoting active street frontages by developing up- to-the- street boundaries; 6. Reinforcing the street corners by ensuring the design is two storey and is transparent on both sides of the street corner; and 7. Encouraging the preservation and promotion of cultural features. <p>(vi) Focusing retailing activities along Bow Street and Wainui Road with new development on these streets designed to:</p> <ol style="list-style-type: none"> 1. Appear small in scale (one or two storeys); 2. Contain active frontages and transparent facades at street level; and 	<p>A to E agree</p> <p>F two storey on the corners would detract from the dominance of the hotel and block views of the surrounding hills, thus reducing the village character.</p> <p>vi) A & B agree</p> <p>C appears to repeat E above.</p>

<p>3. Generally build out to the street boundary.</p>	
<p>4.8.2.2 Policy – Public Views</p> <ol style="list-style-type: none"> 1. (a) Manage development on sites to avoid adverse physical and visual effects on locally important public viewshafts, including adverse cumulative effects on the viewshafts 2. (b) Retain clear South and West views of the harbour, coast and mountain from Bow Street between Norrie Avenue and Bankart Street through subdivision and building design 3. (c) Retain shared views of the harbour, coast and mountain from streets and public places through design of subdivision and through building setbacks and height controls. <p>A definition for ‘Locally Important Viewshafts’ would need to be added which means:</p> <p><i>Viewshafts to the harbour, coast and natural backdrops, including Mount Karioi, from public places which contribute to the unique character of Raglan and includes the following viewshafts:</i></p> <ul style="list-style-type: none"> • from SH23 (north of Maungatawhiri Rd) to Kaitoke Creek • all existing views of the bar from Main Road, Bow St and Norrie Avenue • all existing views of Karioi from Raglan CBD • from Wainui Rd to the coast between the Bryant Reserve and the Bible Crusade Camp • from SH23 summit to Karioi 	<p>a) agree</p> <p>b) views north to Te Horea and pā sites also important. Subdivision and building design need rules.</p> <p>c) agree, but subdivision, building building setbacks and height controls need rules.</p> <p>agree maps not needed to define whole of RSCA, but maps needed for viewshafts - would be much simpler than "more polished in terms of the descriptions", which hasn't been done.</p> <p>"all existing views of the bar from Main Road, Bow St and Norrie Avenue" - replace bar with harbour to retain seaside village character</p>
<ul style="list-style-type: none"> • AroAro salt marsh from Wallis St 	<p>agree</p>
<p>4.8.3 MATTERS OF DISCRETION</p> <p>In addition to those matters of discretion within the relevant zone rules, the Council will restrict its discretion to the following matters when assessing a restricted discretionary resource consent application in the Raglan Special Character Area.</p> <ol style="list-style-type: none"> 1. (1) For new buildings in the Raglan Special Character Area: <ol style="list-style-type: none"> 1. (a) the effects on the streetscape and special character context; 2. (b) the building and its effects on Raglan character; including its 	<p>1) The items above cover only the CBD and a few viewshafts. This section needs to address maintaining the character of the rest of the Raglan Special Character Area. To do that definitions and rules are needed to clarify what are acceptable levels of "effects on the streetscape and special character", design, quality, purpose and amenities including matters of appearance, scale, form, massing, materials, setbacks", relationship and "effects on landscape".</p> <p>2) Buildings shouldn't intrude into viewshafts, or is "a locally important public view" something different?</p> <p>a) if there is intrusion, it should be clear that it is minimal, such as aerials.</p>

<p>design, quality, purpose and amenities including matters of appearance, scale, form, massing, materials, setbacks and the relationship to the street; and</p> <p>3. (c) the effects on landscape;</p> <p>4. (d) permitted activity conditions not complied with and matters of control</p> <p>2. (2) For new buildings, or existing buildings where the bulk of the building is increased, that intrude into a locally important public view: (a) effects on the visual integrity of the view from the identified viewing point;</p> <p>(b) location, nature, form and extent of proposed works, including height and setbacks.</p>	
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5) ALEX DEVINE OF KAINGA ORA (EMAIL DATED 11 DECEMBER 2020):

Good afternoon Summer

Please find attached Kāinga Ora’s feedback on the proposed amended provisions to address the ‘special character’ of the urban areas of Raglan.

As previously noted Kāinga Ora has a number of fundamental concerns with the form and appropriateness of the Special Character provisions, and these comments are provided within that context.

Ngā mihi | Kind regards

Alex Devine SENIOR SOLICITOR

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<p>4.8.1 OBJECTIVES</p> <p>To be read in conjunction with other relevant objectives in [Proposed Plan] Section B.</p> <p>4.8.1.1 Objective – Raglan Special Character Area</p> <p>(a) The key characteristics and attributes that define, contribute to, or support the Raglan Special Character Area are not compromised by incompatible development.</p>	
<p>4.8.2 POLICIES</p> <p>To be read in conjunction with other relevant policies in [Proposed Plan] Section B.</p> <p>4.8.2.1 Policy – Raglan Town Centre</p> <p>(a) Development maintains and enhances the role of the Raglan Town Centre by:</p> <ul style="list-style-type: none"> (i) Maintaining wide footpaths and high quality public space, prioritising and providing for pedestrian movement and safety; (ii) Maintaining a pedestrian focus by discouraging vehicle access across footpaths; (iii) Maintaining built form framing views towards Raglan Harbour; (iv) Providing for a building height and scale appropriate to the town centre; and (v) Protecting and enhancing the character of existing buildings through new built form being sympathetic to the existing main street built form and the surrounding context, whilst still promoting the eclectic and artistic nature existing character of the town being consistent with the outcomes of the Town Centre Character Statement for Raglan Town Centre (Appendix 10.1), in particular by: 	<p>Note s42A report recommended the deletion of the Town Centre Character Statement for Raglan Town Centre (Appendix 10.1). We query why this has been referenced in the Policy.</p>

<p>A. Promoting traditional roof forms (hipped or gable ends) and symmetry through window design and placement;</p> <p>B. Providing continuous post supported verandahs sheltering footpaths;</p> <p>C. Promoting recessed shop fronts;</p> <p>D. Providing parking, loading and storage where rear access to buildings exists;</p> <p>E. Promoting active street frontages by developing up- to-the-street boundaries;</p> <p>F. Reinforcing the street corners by ensuring the design is two storey and is transparent on both sides of the street corner; and</p> <p>G. Encouraging the preservation and promotion of cultural features.</p> <p>(vi) Focusing retailing activities along Bow Street and Wainui Road with new development on these streets designed to:</p> <p>A. Appear small in scale (one or two storeys);</p> <p>B. Contain active frontages and transparent facades at street level; and</p> <p>C. Generally build out to the street boundary.</p>	<p>The 'appropriateness' of the policy is in question (insofar as how the rule framework will reflect the policy, as currently drafted).</p> <p>Bow Street and Wainui Road are zoned 'Business' and 'Business Town Centre'.</p> <p>The rules enable 10m in the Business and Business Town Centre Zones as a permitted activity (and 12m has been recommended in the Council's s42a report). However, Policy (vi)(a) requires 'small scale (one to two storeys). Therefore, permitted development within the Business and Business Town Centre Zone along Bow Street and Wainui Road in Raglan will be inconsistent with this policy.</p>
<p>4.8.2.2 Policy – Public Views</p> <p>(a) Manage development on sites to avoid adverse physical and visual effects on locally important public viewshafts, including adverse cumulative effects on the viewshafts</p> <p>(b) Retain clear South and West views of the harbour, coast and mountain from Bow Street between Norrie Avenue and Bankart Street through subdivision and building design</p> <p>(c) Retain shared views of the harbour, coast and mountain from streets and public places through design of subdivision and through building setbacks and height controls.</p> <p>A definition for 'Locally Important Viewshafts' would need to be added which means:</p> <p><i>Viewshafts to the harbour, coast and natural backdrops, including Mount Karioi, from public places which contribute to the unique character of Raglan and includes the following viewshafts:</i></p> <ul style="list-style-type: none"> • from SH23 (north of Maungatawhiri Rd) to Kaitoke Creek • all existing views of the bar from Main Road, Bow St and Norrie Avenue • all existing views of Karioi from Raglan CBD • from Wainui Rd to the coast between the Bryant Reserve and the Bible Crusade Camp • from SH23 summit to Karioi 	<p>In the absence of mapped 'Locally Important Viewshafts', Plan users and decisions makers will be unable to determine whether the view shaft applies to the proposal / property in question. As drafted, and without any mapping, the proposed definition is vague and creates uncertainty for plan users.</p> <p>Further, it is acknowledged that Isthmus Landscape Architects undertook a study of the Special Character of Raglan. However, there is no analysis to justify the potential costs and benefits of the proposed viewshaft (that we are aware of) and how this will impact the proposed 'consolidated urban form' the strategic objectives of the notified PDP.</p>

<ul style="list-style-type: none"> • AroAro salt marsh from Wallis St 	
<p>4.8.3 MATTERS OF DISCRETION</p> <p>In addition to those matters of discretion within the relevant zone rules, the Council will restrict its discretion to the following matters when assessing a restricted discretionary resource consent application in the Raglan Special Character Area.</p> <p>(1) For new buildings in the Raglan Special Character Area:</p> <ul style="list-style-type: none"> (a) the effects on the streetscape and special character context; (b) the building and its effects on Raglan character; including its design, quality, purpose and amenities including matters of appearance, scale, form, massing, materials, setbacks and the relationship to the street; and (c) the effects on landscape; (d) permitted activity conditions not complied with and matters of control <p>(2) For new buildings, or existing buildings where the bulk of the building is increased, that intrude into a locally important public view:</p> <ul style="list-style-type: none"> (a) effects on the visual integrity of the view from the identified viewing point; (b) location, nature, form and extent of proposed works, including height and setbacks. 	<p>As discussed above, in the absence of mapped 'Locally Important Viewshafts', Plan users and decisions makers will be unable to determine whether the view shaft applies to the proposal in question – creating uncertainty.</p>

APPENDIX E
RECOMMENDED AMENDMENTS TO PLAN

AMENDED PROVISIONS OF THE PROPOSED PLAN

RAGLAN SPECIAL CHARACTER AREA

Chapter 4: Urban Environment

4.8: Raglan Special Character Area

The provisions within this chapter are specific to the Raglan Special Character Area which includes all land within the Business, Business Town Centre and Residential Zones (excluding residential zoned land within the Rangitahi Peninsula Area).

The provisions within this chapter are to be read in conjunction with the relevant district-wide provisions contained elsewhere in this plan.

4.8.1 OBJECTIVES

To be read in conjunction with other relevant objectives in [Proposed Plan] Section B.

4.8.1.1 Objective – Raglan Special Character Area

- (b) The key characteristics and attributes that define, contribute to, or support the Raglan Special Character Area are not compromised by incompatible development:

4.8.2 POLICIES

To be read in conjunction with other relevant objectives in [Proposed Plan] Section B.

4.8.2.2 Policy – Key Characteristics & Attributes of Raglan

- (a) Manage development on sites to ensure the following key characteristics & attributes that define, contribute to, or support the Raglan Special Character Area are not compromised by incompatible development:
- i. The strong visual and physical relationship between the township and the harbour, the coast and Mount Karioi.
 - ii. The outward facing nature of the underlying landforms.
 - iii. The arrangement and layout of the township across peninsulas connected by causeways and bridges.
 - iv. The sinuous tree-lined coastal edge formed by the peninsulas, providing extensive access to the harbour within the township.
 - v. The human scale of development in Raglan township which provides a sense of openness within the settlement.
 - vi. The 'bowl' like topography in which both Raglan township and Whaaingarua are set, with rising landform to the north, east and west separating the catchment from other parts of the Waikato District.
 - vii. The relaxed and informal character of the settlement developed over years through limited development pressure and the laid-back community and residents.

4.8.2.3 Policy – Public Views

- (a) Manage development on sites to avoid adverse physical and visual effects on Locally Important Viewshafts, including adverse cumulative effects on the viewshafts
- (b) Retain shared views of the harbour, coast and mountain from streets and public places through design of subdivision and through building setbacks and height controls.

4.8.2.4 Policy Housing Supply, Variety & Choice

Promote increased housing supply, variety and choice by enabling a range of housing densities, typologies, and price options (including the provision of affordable housing) to be delivered within Raglan.

4.8.3 MATTERS OF DISCRETION

In addition to those matters of discretion within the relevant zone rules, the Council will restrict its discretion to the following matters when assessing a restricted discretionary resource consent application in the Raglan Special Character Area.

- (1) For new buildings in the Raglan Special Character Area:
 - (a) the effects on the streetscape and special character context;
 - (b) the building and its effects on Raglan character; including its design, quality, purpose and amenities including matters of appearance, scale, form, massing, materials, setbacks and the relationship to the street; and
 - (c) the effects on landscape;
 - (d) permitted activity conditions not complied with and matters of control
- (2) For new buildings, or existing buildings where the bulk of the building is increased, that intrude into a locally important public view:
 - (a) effects on the visual integrity of the view from the identified viewing point;
 - (b) location, nature, form and extent of proposed works, including height and setbacks.

4.8.4 Definition – Locally Important Viewshafts

Means all existing views to the harbour, coast and/or Mount Karioi from

- SH23 (north of Maungatawhiri Road)
- Main Road, Bow Street and Norrie Avenue
- South and West views from Bow Street between Norrie Avenue and Bankart Street
- Raglan Town Centre
- Wainui Road between the Bryant Reserve and the Bible Crusade Camp