

Whaingaroa Environmental Defence Incorporated

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from Secretary: John Lawson, 51 Cliff St, Raglan 07 825 7866 email johnragla@gmail.com

Dear Sandra

Thank you for your reminder about evidence.

As I read the [report on Hearing 16](#), council is saying it recognises that what WED has said about protecting Raglan's character is important, but that it doesn't intend to do anything about it for the foreseeable future.

It is pleasing to see Council to imply (para 51) that **Raglan's character** should be protected and there should be a plan change to do that. However, they haven't put a timetable on that, nor said what they'll do to protect the character until that change is in place. para 161 also proposes to deal with **high density housing** (eg at the wharf) at the same time. WED requests that Raglan's character and its associated issues should become part 3 of the District Plan. Council has already had to have climate change in a separate part of the plan, which sets a precedent to do the same with this. It should all have been in the one plan, but, as it isn't, it now needs to be dealt with as part of an integrated plan and not a plan change at some unspecified date. As Council now recognises the importance of the character, it is for them to prepare the necessary documentation to support that and not the submitters. Like the climate change section, it should have all been included in a single plan. As each year passes without protection, more of Raglan's character is lost. As recognised in the operative District Plan, Raglan has a seaside village character. That character is of value to those who have chosen to live in Raglan and those who choose to visit and, in so doing, add significantly to the economic prosperity of Raglan. Many submitters, including WED, referred to the out of character development on Wainui Rd. It is in a prominent position and out of character with the majority of single storey buildings in Raglan, with the density and with the materials and style of the buildings which contribute to Raglan's character. Unfortunately it sets a precedent for further loss of character, unless action is taken now.

Although para 72 says, "*I agree that **public participation plays an important role in understanding and ensuring consideration of the character of an area***", that importance is set aside simply because WDC thinks public notification of all DP infringements may contravene s76 RMA. That is claimed because, "*None of the fourteen submissions have [sic] considered the effects on the environment associated with an activity that exceeds the notified permitted standards, or the scale of any infringements*". Despite the acknowledged important role, the rejection doesn't analyse the effects either. As noted above, this work should have been part of an integrated District Plan and WED requests that it be included as a third section of the District Plan and that, in the interim, protection be provided by requiring public notification of all non-complying development proposals.

para 62 is misleading in saying, "*Waikato 2070' anticipates Raglan's population to grow from 4000 to 8500 within the next 50 years. **New areas for residential and commercial growth are identified in the strategy, and the strategy contemplates 3-level townhouses and 4-level buildings within the town centre***" Page 44 of [that plan](#) shows 2-storey as the town centre limit in Raglan. Therefore WDC's response rejecting a structure plan seems to be based on a false premise. A structure plan is especially needed in Raglan if the proposed population increase from 3,000 to 8,500 by 2070 is to take place without lots of unforeseen consequences. A structure plan needs to establish where that increase will occur, what infrastructure and services will be needed to provide for it and how Raglan's character will be protected and enhanced by the growth.

WED supports the changes proposed at paras 95 and 108, though I'm not clear why they're duplicated.

As with the lack of an integrated District Plan, para 185 also gives a good illustration that the **left hand doesn't know what the right hand is doing** in saying, "*Unfortunately, Waikato District Council [697.426] gives a misleading impression that a decision has been made to raise the beacon height. I have enquired about this and I can confirm that in fact to date, neither the District Council nor the Waikato Regional Council (responsible for navigational safety) have committed to raise the beacons.*"

para 118 rejects a **bed tax** without mentioning that Queenstown successfully applies it.

para 168 says most of WED's pleas for the **protection of views** were dealt with in Hearing 10. Views are inherently part of the character of Raglan and should be dealt with as part 3 of the plan.

Regards

John Lawson

WED Secretary.