

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSIONS ON
PUBLICLY NOTIFIED PROPOSAL FOR VARIATION 3 TO THE PROPOSED WAIKATO
DISTRICT PLAN**

under clause 8 of Schedule 1, Resource Management Act 1991 (RMA)

To: Waikato District Council
Private Bag 544
NGARUAWAHIA
(by email: districtplan@waidc.govt.nz)

Name of submitter: Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited

1. Rangitahi Limited, Scenic Properties 2006 Limited and Raglan Land Company Limited (collectively referred to as **Rangitahi**) makes this further submission in support of or opposition to submissions on proposed Variation 3 (Enabling Housing Supply) to the Proposed Waikato District Plan (**Variation 3**).
2. Rangitahi has an interest in Variation 3 that is greater than the interest the general public has on the grounds that Rangitahi has substantial landholdings in Raglan. The use and development of Rangitahi's land is directly affected by relief sought on submissions on Variation 3.

Submissions supported or opposed

3. The submissions that Rangitahi supports or opposes are set out in the table attached as **Appendix A** to this further submission.

Reasons for further submission

4. For the submissions in **Appendix A** that Rangitahi supports or opposes (either in full or in part) those submissions should be allowed or disallowed (either in full or in part) as sought by Rangitahi, so as to:
 - a. ensure the MDRS is only applied to 'relevant residential zones' within the district;
 - b. be consistent with the requirements of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021;
 - c. give effect to the National Policy Statement for Urban Development 2020; and
 - d. avoid adversely affecting Raglan's special character.
5. Without limiting the generality of the above, the additional reasons why Rangitahi supports or opposes each submission are set out in **Appendix A**.

Decisions sought:

6. Rangitahi seeks the following relief:
 - a. That the submissions supported in **Appendix A** be allowed (either in full or in part).

- b. That the submissions opposed in **Appendix A** be disallowed (either in full or in part).
 - c. Such further, alternative or other consequential amendments as may be necessary to fully address Rangitahi's further submission.
7. Rangitahi wishes to be heard in support of this submission.

Signed for and on behalf of Rangitahi by:


Tony McLauchlan
Development Manager
Date: 19 December 2022

Address for service: Monocle
Panama Square
14 Garden Place
HAMILTON 3204

Telephone: 027 836 6507
Email: ben@monocle.net.nz
Contact person: Ben Inger

Appendix A – Submissions supported and opposed, reasons and relief

	Name, address and original submission number	Sub #	Chapter, subject and submitter's relief	Support or oppose	Reasons	Decision sought
1.	Ministry of Housing and Urban Development rmaplans@hud.govt.nz Submission 50	50.2	All of Variation No specific decision requested, but submission considers that Variation 3 correctly identified the residential zones in Huntly, Ngaaruawaahia, Tuakau, and Pookeno as relevant residential zones.	Support	The submitter agrees that Variation 3 correctly identifies the residential zones in Huntly, Ngaaruawaahia, Tuakau, and Pookeno as the 'relevant residential zones' in Waikato District.	Allow the submission.
2.	Waikato Community Lands Trust, Bridge Housing Charitable Trust, Waikato Housing Initiative, Habitat for Humanity Central Region, Momentum Waikato thomas@gibbonslaw.co.nz jennifer.palmer@perry.co.nz whi@waikatohousinginitiative.org nic.greene@habitat.org.nz kelvyn@momentumwaikato.nz Submission 93	93.1	All of Variation Variation 3 be amended to include new Plan provisions on inclusionary zoning and including financial contributions.	Oppose	<ol style="list-style-type: none"> 1. The purpose of Variation 3 is to incorporate the MDRS into the Proposed Waikato District Plan and to give effect to Policies 3 and 5 of the NPS-UD. The MDRS is only required to be implemented in a 'relevant residential zone' and Policies 3 and 5 of the NPS-UD only relate to 'Urban Environments'. Raglan is not an 'Urban Environment' and it does not contain a 'relevant residential zone' because it's resident population was less than 5000 at the 2018 census and the s32 Report confirms it is not intended by WDC to become part of an 'Urban Environment'. The introduction of inclusionary zoning provisions for Raglan is therefore beyond the scope of Variation 3. 2. Amending Variation 3 to require inclusionary zoning would be a significant change which would be more appropriately considered and consulted on through a separate process. That approach would be consistent with Change 1 to the WRPS which recognises that housing affordability is a complex issue and there are a range of regulatory and non-regulatory tools which should be investigated (one of those being inclusionary zoning). 	Disallow the submission.
3.	Kāinga Ora developmentplanning@kaingaora.govt.nz Submission 106	106.5	Planning Maps Amend the planning maps to extend the MRZ in Raglan to a 400m walkable catchment of the Raglan Town Centre and include land that has previously been retained as General Residential Zone [see submission for identification of sites]. AND Any such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.	Oppose	<ol style="list-style-type: none"> 1. The purpose of Variation 3 is to incorporate the MDRS into the Proposed Waikato District Plan and to give effect to Policies 3 and 5 of the NPS-UD. The MDRS is only required to be implemented in a 'relevant residential zone' and Policies 3 and 5 of the NPS-UD only relate to 'Urban Environments'. Raglan is not an 'Urban Environment' and it does not contain a 'relevant residential zone' because it's resident population was less than 5000 at the 2018 census and the s32 Report confirms it is not intended by WDC to become part of an 'Urban Environment'. Changes to the zoning of land in Raglan are therefore beyond the scope of Variation 3. 2. The issue of the most appropriate residential zoning for land in Raglan has recently been considered through the Proposed Waikato District Plan submissions and hearing process. Extending the Medium Density Residential Zone in Raglan would adversely affect Raglan's special character and may foreclose opportunities for future expansion of the Raglan Town Centre (see submission 4). 	Disallow the submission.
4.	Kāinga Ora Submission 106	106.6	Generic Topic Encourages the Council to immediately prepare and notify plan changes that would increase the extent of the town centre zoning footprint within Raglan. Such a plan change should also provide for consideration of additional medium density zoning within the walkable catchment of the future extent of the Raglan Town Centre. AND	Oppose in Part	<ol style="list-style-type: none"> 1. The purpose of Variation 3 is to incorporate the MDRS into the Proposed Waikato District Plan and to give effect to Policies 3 and 5 of the NPS-UD. The MDRS is only required to be implemented in a 'relevant residential zone' and Policies 3 and 5 of the NPS-UD only relate to 'Urban Environments'. Raglan is not an 'Urban Environment' and it does not contain a 'relevant residential zone' because it's resident population was less than 5000 at the 2018 census and the s32 Report 	Disallow the submission.

	Name, address and original submission number	Sub #	Chapter, subject and submitter's relief	Support or oppose	Reasons	Decision sought
			Any such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in the submission.		<p>confirms it is not intended by WDC to become part of an 'Urban Environment'.</p> <p>2. Rangitahi does agree, however, that there is a need for WDC to plan for future retail and commercial needs within the Raglan Town Centre to accommodate planned residential growth elsewhere in the town whilst also protecting Raglan's special character. This would need to occur via a separate process to Variation 3.</p>	
5.	The Retirement Villages Association of New Zealand Incorporated luke.hinchey@chapmantripp.com marika.williams@chapmantripp.com Submission 107	107.3	<p>All of Variation</p> <p>Review the application of the MDRS to Huntly Tuakau, Ngaaruaawhaia and Pookeno, and in particular the urban fringe qualifying matter.</p> <p>AND</p> <p>Review the application of MRZ1 in Raglan and Te Kauwhata.</p>	Oppose in Part	<p>1. The purpose of Variation 3 is to incorporate the MDRS into the Proposed Waikato District Plan and to give effect to Policies 3 and 5 of the NPS-UD. The MDRS is only required to be implemented in a 'relevant residential zone' and Policies 3 and 5 of the NPS-UD only relate to 'Urban Environments'. Raglan is not an 'Urban Environment' and it does not contain a 'relevant residential zone' because it's resident population was less than 5000 at the 2018 census and the s32 Report confirms it is not intended by WDC to become part of an 'Urban Environment'. Changes to the zoning of land in Raglan are therefore beyond the scope of Variation 3.</p> <p>2. The issue of the most appropriate residential zoning for land in Raglan has recently been considered through the Proposed Waikato District Plan submissions and hearing process.</p>	Disallow the submission to the extent that it relates to Raglan.
6.	The Retirement Villages Association of New Zealand Incorporated Submission 107	107.73	<p>Maps</p> <p>Reconsider the aerial extent of the Medium Density Residential 2 Zone.</p> <p>AND</p> <p>Remove the urban fringe qualifying matter so those areas are rezoned from General Residential to Medium Density Residential Zone 2.</p> <p>AND</p> <p>The Medium Density 1 Zone is rezoned to Medium Density Residential Zone 2 (Raglan and Te Kauwhata).</p>	Oppose in Part	<p>1. The purpose of Variation 3 is to incorporate the MDRS into the Proposed Waikato District Plan and to give effect to Policies 3 and 5 of the NPS-UD. The MDRS is only required to be implemented in a 'relevant residential zone' and Policies 3 and 5 of the NPS-UD only relate to 'Urban Environments'. Raglan is not an 'Urban Environment' and it does not contain a 'relevant residential zone' because it's resident population was less than 5000 at the 2018 census and the s32 Report confirms it is not intended by WDC to become part of an 'Urban Environment'. Changes to the zoning of land in Raglan are therefore beyond the scope of Variation 3.</p> <p>2. The issue of the most appropriate residential zoning for land in Raglan has recently been considered through the Proposed Waikato District Plan submissions and hearing process.</p>	Disallow the submission to the extent that it relates to Raglan.