



Submission on Proposed Waikato District Plan

Waikato District Council
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SCANNED
Ser No _____

ECM Project: DPRPh5-03
ECM #
Submission #
Customer # 73167
Property # 1/9

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Organisation: N/A
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Please tick your preferred method of contact: Email
Correspondence to Submitter
Trade competition and adverse effects: I could not gain an advantage in trade competition through this submission.
Would you like to present your submission in person at a hearing? Yes
If others make a similar submission I will consider presenting a joint case with them at the hearing. Yes

Provision number 4.1.18 Policy - Raglan

- (a) Raglan is developed to ensure:
- (i) Infill and redevelopment of existing sites occurs;
 - (ii) A variety of housing densities is provided for;
 - (iii) Rangitahi is the only area that provides for the medium term future growth and is developed in a manner that connects to the existing town and maintains and enhances the natural environment; and
 - (iv) There are connections between the town centre, the Papahua Reserve and Raglan Wharf.

Physical address of the property concerned (if relevant to your submission):

Do you: oppose

The decision I would like is: The following as minimum need to be included into the Policy:

- Consideration to Naturally Raglan documentation shall provide development guidance
- Development shall complement and maintain the Raglan's built form and character that reflects its harbour setting and is compatible with Raglan's seaside village character.
- Protection of the coastal environment and character
- All residential development will utilise the Waikato Urban Design Guidelines 'Residential Subdivision'
- Town Development shall utilise the WDC Character statements – Raglan Town Centre as the minimum basis for any new buildings/development within the town
- Any development within the town centre (or overlay areas) shall be notified for public consultation
- The ongoing development of cycling and pedestrian facilities and links to the rural community
- Raglan is a place to work and live rather than a place of commuters

My reasons for the above are: The policy for Raglan is totally inadequate and needs to be greatly expanded to ensure the character, amenity and aspirations of Raglan can be managed, maintained and achieved. Greater focus needs to be given to the vision and aspirations expressed by the community particularly with WDC's support of developing Raglan Naturally (particularly given WDC recently consenting the appalling development/ 11 new apartments on the corner of Wainui Rd/Stewart St. Although the 2005 development/character assessment has been re-vitalised into the WDC Raglan Character Statement (2018), this needs considerable more work to define the character areas and expand on the design guidelines/outcomes sought, which must be done in consultation with Raglan area residents

Provision number 4.1.18 Policy - Raglan

Physical address of the property concerned (if relevant to your submission):

13/4 Stewart St, Raglan

Do you: Oppose

The decision I would like is: Housing for the elderly should be required in all new

developments

My reasons for the above are:

I support WED's submission in that:

'The former Lazarus village is on fairly level ground, close to Raglan's main facilities. It is therefore better suited to house Raglan's above average elderly population than most sites in the town and should be restored to that use. Without protection it is likely that the only non-hospital housing for elderly people in Raglan will be permanently lost'.

Provision number 5.3.9 Policy – Non Rural Activities (a)

Manage any non-rural activities, including equestrian centres, horse training centres, forestry and rural industries, to achieve a character, scale, intensity and location that are in keeping with rural character and amenity values.

Physical address of the property concerned (if relevant to your submission): 270 Ohautira Road

Do you: oppose

The decision I would like is: This section to include 'gun club shooting activities'

My reasons for the above are: The noise and obtrusiveness of this activity is completely incompatible with the area, especially as it occurs over weekends. The inclusion would allow management/avoidance of existing/proposed gun club activities, which are incompatible with the local quiet rural amenity values of lifestyle and farming properties.

Provision number 5.3.11 Policy – Home Occupation

- (a) Support any home occupation to enable flexibility for people to work from their homes, provided that it is of a scale that is consistent with the character and amenity of the rural environment.

Physical address of the property concerned (if relevant to your submission):

Do you: support with amendment

The decision I would like is: This section to include 'promote' & make it easier for people working from home to achieve this & avoid the high costs associated with applying for resource consents.

My reasons for the above are: There are a number of real benefits in promoting and supporting occupation activities, such as improved productivity by removing travel time, less travel and resulting in better environmental outcomes while promoting sustainable rural communities.

Provision number 5.3.15 Policy – Noise and Vibration

- (a) Adverse effects of noise and vibration are minimised by:
- (i) Ensuring that the maximum sound levels are compatible with the surrounding environment;
 - (ii) Limiting the timing and duration of noise-generating activities;
 - (iii) Maintaining appropriate buffers between high noise environments and noise sensitive activities;
 - (iv) Ensuring frost fans are located and operated to minimise the adverse noise effects on other sites.
 - (v) Managing the location of sensitive land uses, particularly in relation to lawfully-established activities;
 - (vi) Requiring acoustic insulation where sensitive activities are located within high noise environments, including the Airport Noise Outer Control Boundary, Huntly Power Station, the Gun Club Noise Control Boundary.
 - (vii) Ensuring the adverse effects of vibration are managed by limiting the timing and duration of blasting activities and maintaining sufficient setback distances between aggregate extraction activities and dwellings or identified building platforms on another site.
 - (viii) Manage noise to protect existing adjacent activities sensitive to noise effects.

Physical address of the property concerned (if relevant to your submission): 270 Ohautira Road

Do you: oppose

The decision I would like is: Include the provision for a defined flight path corridors for recreational and schools/training light aircraft that avoid rural properties, fly avoidance/exclusion zones, noise control of aircraft engines. A total ban on engine stall on all rural land/housing & only allowed way off shore.

My reasons for the above are:

The number and frequency of light aircraft movement and noise within the area has increased dramatically over the past 10 years, largely due to CTC training international pilots based out of Hamilton & our area falling within the flight routing. The amenity of our quiet rural community is consistently being eroded and affected by the frequency and noise of small/light aircraft either flying to Raglan Airport or by the use of the air space by CTC Aviation Training facility that frequently circle for hours. Engine stalling is not only daunting, but increases noise when they thrust engines back on

In addition, there is a high demand for more pilots worldwide, the situation is likely to get worse, plus more local people are flying more regularly. WDC need to map areas of low habitation and define acceptable flight path routes. Additionally, the variation in engine noise of light aircraft varies dramatically and noise limits/reducing devices on aircraft engines needs to be implemented. The measures need to go beyond a mere flying height or decibel requirement, as the effects on a very low decibel environment is incredibly intrusive and affects resident's well-being and health.

Provision number 9; Specific Zones

- (a) Support any home occupation to enable flexibility for people to work from their homes, provided that it is of a scale that is consistent with the character and amenity of the rural environment.

Physical address of the property concerned (if relevant to your submission):

Do you: Oppose

The decision I would like is:

Raglan township and surrounds should be included as a Specific Zone due to being Waikato's only substantial and special seaside community

My reasons for the above are:

My concern is that Raglan's special character is being eroded and the planning policy and rules are inadequate to manage the future growth of Raglan.

Raglan has been identified as a special place for local, national and international visitors to visit, which is largely due to it being a unique place to be. The town's character related to its 'wild west coast' environment and character, where the diverse buildings and mix of people, the relaxed quirky and arty environment prevails where individual expression prevails contributes to the amenity and character of Raglan. It is a pedestrian and bike friendly place (although much more work needs to be done in relation to expanding and improving facilities) with the key characteristics and attributes including water views, human scale buildings and no multi story or row of apartment buildings (which distinguishes it from other poorly overdeveloped and out of character seaside settlements).

Provision number: 22.4.1.2 P3 (a) (iii) Slope

Physical address of the property concerned (if relevant to your submission):

Do you: Oppose

The decision I would like is:

Amend text to a maximum slope of 1:2.5

My reasons for the above are: A 1:2 slope is on the limit of stability and is poor practice. Instability/risk of failure is higher, unless a geotechnical design is developed to minimise the risk, plus steeper slopes are difficult to top soil and plant

Provision number: 22.4.4.4 P1(a) Earthworks

Physical address of the property concerned (if relevant to your submission):

Do you: Oppose

The decision I would like is: Add the following text "over any consecutive 12 month time period"

This would add limits to total development, consistent with maintaining the values of the site (maintaining the topographical form, retaining vegetation, maintaining natural water flows).

My reasons for the above are: To manage accumulative effects to ensure the character of the area is maintained, as incremental annual changes can amount to significant destruction or visual change of an areas resulting in adverse effects.

Provision number: 24.2.6 Notable Tree – Schedule 30.2

Physical address of the property concerned (if relevant to your submission):

Do you: Oppose

The decision I would like is:

Schedule 30.2 requires updating to include the following notable trees associated with Raglan

- trees within 30 metres of the high water mark between the Bow St jetty and Helen Place
- trees adjacent to the airfield
- trees within 10 metres of Marine Parade
- trees between the recreation ground and Lily St
- trees on Wallis St at the foot of Government Rd
- trees in the gully between Rose St and Lily St
- trees to the south west of SH23 between Hills Rd and Greenslade Rd
- trees in the Lorenzen Bay reserve.
- Tree protection is clearly inadequate, as unauthorised removal of listed trees by council has shown. Trees are important for landscape, nature and carbon storage.
- large trees should all be protected.

My reasons for the above are:

Notable Trees Schedule 30.2 clearly doesn't cover sufficient notable trees within the definition, which are important as they help define the character and amenity of Raglan plus provide diversity for wild life habitat (it is noted that only 160 notable trees are listed for the whole District).

Provision number 24.2.8 P6 Removing of up to 5m³ of manuka and/or kanuka outside of the Coastal Environment per single consecutive 12 month period per property for domestic firewood purposes and arts or crafts provided the removal will not directly result in the death, destruction or irreparable damage of any other tree, bush or plant.

Physical address of the property concerned (if relevant to your submission):

Do you: Oppose

The decision I would like is: Limit removal to 3m³ and remove reference to the Coastal Environment.

My reasons for the above are: Manuka and kanuka are important habitat environments and provide visual amenity. Therefore, 3m³ should be adequate for heating purposes with non-native wood sources available.

Provision number 24.3.3.1 P1 The maximum height of a building must not exceed 7.5m.

Physical address of the property concerned (if relevant to your submission):

Do you: **Oppose**

The decision I would like is:

Amend text to encourage the use of variable building heights, stepped facades to maintain the built character of Raglan. For example:

'A maximum height of a building must not exceed 7.5m, and where continuous roof lines occur (more than one unit) then variable roof lines should be implemented to maintain the character of Raglan'

My reasons for the above are: The provision for a maximum height then makes it more of a target and does not allow encourage variable roof heights that would complement the built character of Raglan. Typically housing in and around Raglan have variable heights and forms that contribute to the character of the area, which needs to be considered in the policy.

Provision number 8.1.2 Policies – Provision, use and development of public open space and reserves

Physical address of the property concerned (if relevant to your submission):

Do you: **Oppose**

The decision I would like is:

Residential development will conform to the Waikato Urban Design Guidelines 'Residential Subdivision' in relation to layout around open space and stormwater design features

My reasons for the above are: Developments need to ensure properties integrate with open space and stormwater devices such as wetland ponds rather than have them fenced in or with properties 'turning' their back to them.

Provision number: 8.1.3 Policies - Esplanade Reserves and Walkways

Physical address of the property concerned (if relevant to your submission):

Do you: Oppose

The decision I would like is:

Add provision for new cycle/walkways, not only in major new developments, but to implement Council's [Walking, Cycling and Bridle Trails Strategy](#). Add to the maps the planned Wainui Rd to Te Hutewai Rd walk/cycle track and other unformed roads not shown on the maps. Add all the tracks shown on the Strategy maps and walk ways through the residential zones linking Lorenzen Bay with Kaitoke Walkway, allowing a circular walk around Raglan, a cycle track from Wallis St to Violet St, a link to the national Te Araroa walkway using paper roads, etc (via Karioi, Bridal Veil), walkways (and where possible cycleways) along the whole coast, a track from Raglan to the summit of Karioi using esplanades, reserves and paper roads and a link along Wainui Stream from Wainui Reserve to Bryant Reserve.

My reasons for the above are:

I support WED's submission in that :

1.10.2.3 includes the Strategy as relevant, yet there is no timeframe for implementation of the Strategy. Without support from the District Plan it is unlikely that most of the Strategy will be achieved. 4.1.8 states the Plan will, "*(a) Ensure effective integration within and between new developments and existing areas, including in relation to public open space networks and infrastructure by;*

(i) Providing good access to facilities and services by a range of transport modes through the provision of integrated networks of roads, public transport, cycle, and pedestrian routes".

4.1.10 Policy – Tuakau, 4.1.11 Policy – Pokeno, 4.1.12 Policy - Te Kauwhata, 4.1.14 Policy – Taupiri, 4.1.15 Policy – Ngaruawahia, 4.1.16 Policy – Horotiu and 4.1.17 Policy - Te Kowhai all mention walking and cycling provision, though leave the means and locations unclear.

4.1.18 Policy – Raglan is the only town policy not to mention cycling and walking, despite a [May 2018 staff report to Council](#) saying, "*Raglan has the district's highest walking/cycling communities*".

For example, 1.4.2.2 mentions, "*Revocation of parts of State Highway 1 will offer opportunities for some town centre improvements and cycle/walk ways*", yet nowhere in the Plan is it indicated where 'some' might be, though it is clearly a land use issue.

At the last Plan revision, Council said detailed rules for walk/cycleways are not appropriate for a District Plan, yet have expanded to 35 pages the detail in 14.12 about vehicle turning circles, road widths, sight lines, etc. By contrast, there is just a rule about buses having a space for 200 school students and a rule that some new buildings should have cycle parking.

On page 42 Raglan Naturally says, "*There is strong public support for harbour and coastal walkways.*" and "*Create coastal walkways, eg Raglan to Whale Bay, Whale Bay to Te Toto Gorge.*" This local support reflects national trends; time use surveys show walking as being ahead of all other active sports and pursuits. European surveys have

similar results, so that environmental tourism, encouraging tourists to spend more time walking than driving, could be made a much more valuable asset, giving an economic, as well as health and recreation, impetus to the need to implement policies in recognition of the importance of walking and cycling as noted at 1.4.3.1. The lack of progress indicates that opportunities are not taken with subdivisions and that more detail needs to be included in the District Plan.

Provision number 16.4.14 (b) Subdivision of esplanade reserves and esplanade strips

Council's discretion shall be restricted to the following matters:

Physical address of the property concerned (if relevant to your submission):

Do you: Oppose

The decision I would like is: to include the developer of lots 4 ha shall be required to provide esplanade facilities that will include as a minimum a 1.8m wide timber edge gravel path walkway and 10% of area landscape planting

My reasons for the above are: To promote the development and linkages of esplanade areas to increase the areas walking and cycling facilities

Provision number: Proposed New Chapter in relation to Genetically Modified Organism's (GMO)

Physical address of the property concerned (if relevant to your submission):

Do you: Support

The decision I would like is:

I make this submission on the Proposed Waikato District Plan requesting that it include strong precautionary and prohibitive policies and rules relating to the management of genetically modified organisms ("GMOs"), as allowed under the Resource Management Act 1991 ("RMA") and pursuant to the ruling in Federated Farmers of New Zealand v Northland Regional Council

[1Federated Farmers of New Zealand v Northland Regional Council [2015] NZEnvC 89.]

The decision I seek from Waikato District Council is that the Proposed Waikato District Plan be amended to include the following:

- (a) A resource management framework for the management of GMOs that is regional specific taking into account environmental, economic and social well-being considerations.
- (b) Strong precautionary and prohibitive provisions, policies and rules relating to GMOs that are the same (or similar) as those in the Far North District Plan, the

Whangarei District Plan and the Auckland Unitary Plan, to ensure a consistent approach across Northland, Auckland and the Waikato and to eliminate cross boundary issues.

My reasons for the above are:

I have significant concerns about the potential risks posed by the release of GMOs into the environment and the ethical issues associated with the development of GMO's in relation to food, plant medicine and pest control. GMOs have the potential to adversely affect ecological, economic, and resource management values, and the social and cultural wellbeing of people, animals, communities and tangata whenua.

1. The release of GMOs has a potential to cause significant adverse effects on the environment and people, which could include:
 - (a) biological or ecosystem harm or damage;
 - (b) harm to tangata whenua cultural values such as mauri and tikanga especially in relation to native plants, Rongoa medicine and animals;
 - (c) harm to the cultural values and lifestyle decisions of people and communities at a local level concerning their health wellbeing; The lack of studies on GMO's effects on human physiology by ingesting GMO's whether inadvertently due to non-labelling or via secondary medium [animal consumption fed GMO feed] means that people are one big experiment with potential detrimental effects on health!
 - (d) harm from GMO contamination to existing or potential forms of land use including farming, forestry, beekeeping, marine farming and other primary production activities dependent on an uncontaminated environmental brand. Adverse effects to these land uses could include:
 - (i) loss of organic and GMO-free certification;
 - (ii) reputational damage;
 - (iii) loss of markets and premiums paid for GMO free produce; and
 - (iv) loss of livelihood.
2. No matter how carefully conditions of consent for GMOs are crafted, there inevitably remains a risk, even if small, that conditions may be breached by poor management, human error, natural events such as severe storms and even the sabotage of projects.
3. Once GMOs have been released into the environment, they would be very difficult if not impossible to eradicate. In the case of a food product, the "GE free" status of

a district would likely be lost permanently along with the market advantages of that status.

4. Application of integrated management and a precautionary approach to GMOs under the RMA is the best available technique for managing the potential adverse effects posed by GMOs within the region.
5. It is consistent with the sustainable management purpose and Part II of the RMA to establish district plan provisions (e.g. issues, objectives, policies, rules and methods) that manage the release, location and management of GMOs where they have the potential to adversely affect the environment and other land use activities.