

**IN THE MATTER** of the Resource Management Act 1991 (**RMA**)  
**AND**  
**IN THE MATTER** of the Proposed Waikato District Plan  
**BETWEEN** **RANGITAHİ LIMITED**  
Submitter [No. 343]  
**AND** **WAIKATO DISTRICT COUNCIL**  
Local Authority

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**MEMORANDUM OF COUNSEL REQUESTING A CHANGE OF VENUE  
HEARING 25 - RAGLAN**

**Dated:** 26 February 2021

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Solicitors on Record

**BURTON PARTNERS**  
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**MAY IT PLEASE THE COMMISSIONERS:**

1. Counsel acts for Rangitahi Limited (**Rangitahi**) on the Proposed Waikato District Plan (**pWDP**).
2. This memorandum follows the advice from the Hearing Administrator (dated 2 February 2021) that Hearing 25 Zone Extents will be structured by geographical areas. Rangitahi seeks directions for a change in venue for the Raglan Topic from the Council offices in Ngaruawahia to Raglan township.
3. Rangitahi's submission on the Zone Extents Topic has sought placed-based planning for growth with provision for a Council-led, Raglan-wide spatial plan followed by site specific structure planning to achieve live zoning. This approach would enable growth that is responsive to Raglan's special character and landscape.
4. The request for directions for the Raglan topic to be heard in Raglan is made on the basis that:
  - (a) The Council has recognised for some years that Raglan needs a masterplan for growth;
  - (b) Raglan has been identified as an area for urban growth in Waikato 2070, and the demand is confirmed in the modelling that forms part of the s.42A Framework Report;
  - (c) The special character of Raglan has been recognised through the pWDP hearings and the Raglan character workshop;
  - (d) The identification of the Afon Opotoru and Te Hutewai growth areas post-dates the notification of the pWDP, and as such those growth areas were not a focus for public submissions on the pWDP;
  - (e) Similarly, the Council's proposal to include provisions for a Future Urban Zone was not part of the notified pWDP;
  - (f) It is appropriate that planning for the future growth of Raglan is undertaken in the context of Raglan's special character and landscape values;.

- (g) In particular, the Afon Opotoru and Te Hutewai growth areas identified Raglan Development Plan should be “ground truthed” in the landscape setting of those growth areas; and
  - (h) That process should be public and allow for the wider community (not only submitters) to attend and hear the presentation of submissions.
- 5. Accompanying this Memorandum is a Joint Statement provided by Rangitahi’s landscape and urban design experts, Rachel de Lambert and James Lunday. They consider that holding the hearing in Raglan will enable the Commissioners an opportunity to engage with the important landscape and urban design issues raised in submissions; and to directly observe the landscape of Raglan and the township’s urban design qualities.
- 6. It is respectfully suggested that a Raglan-based hearing will significantly enhance the Commissioners understanding of the landscape setting and context for the growth provisions sought through submissions, and assist in the decision-making process.
- 7. The commissioners who heard Plan Change 12 expressed disappointment that they could not – within the scope of that plan change – consider the structure plan for Rangitahi Peninsula in a Raglan-wide context. With respect, counsel suggests that when an opportunity is presented to consider provisions for future growth in a Raglan-wide context the hearing should take place in Raglan.
- 8. Rangitahi is enquiring whether the Raglan Bowling Club is available between mid-May to mid-June as a potential venue. The club was the venue for the Plan Change 12 hearing, and Rangitahi can assist with contact details for the club President. Rangitahi is also enquiring if the Town Hall or the Raglan Sunset Motel (on Bankart Street) are available as alternative venues.
- 9. Rangitahi respectfully seeks directions:
  - (a) For service of this Memorandum on the submitters and further submitters on Zone Extents (Raglan Topic);
  - (b) Giving those submitters and further submitters 5 working days to comment on the request for a change of venue; and

- (c) Following consideration of any comments, for a change in venue to Raglan township for the Zone Extents (Raglan Topic) hearing.

**DATED** 26 February 2021



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**Dr R.A. Makgill / B.C. Parkinson**  
**Counsel for Rangitahi Limited**