

WAIKATO DISTRICT PLAN REVIEW SUBMISSION

SUBMITTER KONING FAMILY TRUST and MARTIN KONING

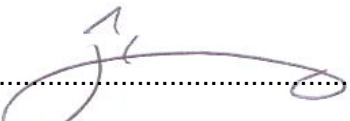
TOPIC: Extent of residential zoning at Raglan

**MEMORANDUM OF COUNSEL FOR THE SUBMITTER IN RELATION TO
THE S42A FRAMEWORK REPORT**

Dated: 8 MARCH 2021

1. This Memorandum is lodged in relation to the s42A Framework Report following the issue of directions to address Framework Report issues on 5 March 2021.
2. The Submitters Koning Family Trust and Martin Koning (“the Konings”) seek re-zoning of Rural zoned land at the southern edge of Raglan to Residential Zone.
3. These submissions are brief given the time available and other commitments of the Submitters and counsel.
4. The Konings generally support the contents of the Memorandum of Mr. P. Fuller in relation to Framework Report issues dated 4 March 2021.
5. The issue of greatest importance to the Konings is to avoid any encouragement to writers of future s42A reports that they should apply the notified Objectives and Policies that are relevant to urbanization in a way that gives inappropriate weight to the notified zonings or to existing land use.
6. If s42A Report writers and decision-makers recognize that some Objectives and Policies such as Objective 5.1.1(a)(iii) will be not be rigidly applicable in the context of a re-zoning proposal, the 3 lens approach recommended in the Framework Report can be an effective tool in achieving consistency of approach.
7. Counsel would appreciate the opportunity to address these issues and any contrary submissions before or during a conference on these issues.

Dated: 8 March 2021


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P. Lang, counsel for the Submitter