

Section 32AA Evaluation Report – changes to 4.1.18 Policy – Raglan

This report is for the purpose of satisfying the requirements of s32AA in terms of evaluating the amendments proposed on behalf of the Koning Family Trust and Martin Koning “The Konings” in relation to the Strategic Direction of the Proposed Waikato District Plan.

S32AA requires a further evaluation of changes that are proposed since the evaluation report for the proposal was completed in accordance with s32(1) to (4). It is to be undertaken at a level of detail that corresponds to the scale and significance of the change.

4.1.18 Policy – Raglan

This policy was notified with the following wording:

(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*

The Konings have sought to amend the policy to allow other areas of Raglan to assist in providing for future growth of the town. The amendment sought is included below.

ii) ...

iii) Rangitahi and other areas around the Raglan urban area are the primary locations for-is the only area that provides for the medium term growth and is are developed in a manner that connects to the existing town and maintains and enhances the natural environment; and

iv) ...

As per s32(1)(b), any changes need to be examined to consider whether the policy is the most effective way to achieve the objectives by considering other reasonably practicable options and the efficiency and effectiveness of the policy in achieving the objectives

This policy falls under Objective 4.1.7 – Character of towns which reads:

(a) Development in the Residential, Village, Industrial and Business zones is attractive, connected and reflects the existing character of towns.

It is considered that the following Objectives are also relevant:

- 4.1.1 Objective – Strategic
 - (a) Liveable, thriving and connected communities that are sustainable, efficient and co-ordinated.*

(b) National Policy Statement on Urban Development Capacity Minimum Targets. The minimum targets for sufficient, feasible development capacity for housing in the Waikato District area are met, in accordance with the requirements of the National Policy Statement on Urban Development Capacity 2016.

- 4.1.2 Objective – Urban growth and development
 - (a) Future settlement pattern is consolidated in and around existing towns and villages in the district.*

S32(2)(a) Efficiency and Effectiveness assessment

The following considers the costs and benefits of liberalising Policy 4.1.18 in relation to the future growth of Raglan.

	Costs	Benefits
Environmental	- There may be environmental costs associated with development in other areas, however amending the policy to be less restrictive does not have direct environmental costs.	- Development can provide opportunities to make environmental improvements, however the proposed amendments to the policy will not have a direct environmental benefit.
Economic	- There will be infrastructure costs associated with continued development, however there are mechanisms available to address this when appropriate.	- Provides additional opportunities for housing to be provided in a growth area rather than only identifying a single developer's land in the district plan.
Social	- There are no social costs associated with the liberalisation of Policy 4.1.18.	- Provides for growth of Raglan and introduces the possibility of choice and competition to the market, meeting current and future demand for housing.
Cultural	- The cultural costs of additional development are unknown, however the changes proposed do not have direct cultural costs.	- There are no direct cultural benefits associated with the liberalisation of Policy 4.1.18.

S32(2)(a)(i) Opportunities for economic growth

Liberalising Policy 4.1.18 provides a less restrictive policy framework for the future growth of Raglan that provides the option for alternative growth areas to meet projected demand for housing supply.

The current policy identifies a single location for growth for the next 10 years. This single growth location has been recommended to be extended by the s42A officer to 30 years. By allowing the opportunity for growth to be provided in other locations, this provides other economic growth opportunities in Raglan and more importantly, it does not restrict those growth opportunities to one location.

S32(2)(a)(ii) Opportunities for Employment

If other areas of Raglan were to be developed, then this would provide additional opportunities for employment associated with construction and development. Additional employment opportunities are likely to arise as the population grows.

S32(2)(c) Risks associated with acting or not acting and the information available

The proposed changes solely relate to amendments to 4.1.18 Policy - Raglan which provides direction for the growth of the town over the life of the district plan. Currently, the policy explicitly restricts growth to one location which is being developed by one entity, which restricts the market for growth in Raglan and limits or removes housing choice. The proposed changes to the policy remove this restriction and while they do not provide or assess the appropriateness of development in other locations, they do enable this to be considered. There is clearly a risk of constraining a market that has been shown to have housing demand over the short, medium and long term if the current policy wording is retained. Liberalising the policy to remove the exclusivity of Rangitahi removes this risk and enables other growth areas to be considered on their merits.

Appropriateness

The proposed changes to 4.1.18 Policy are not in conflict with Objective 4.1.7 - Character of towns, as development can meet these objectives regardless of location.

Objective 4.1.1 seeks to create sustainable, efficient and co-ordinated communities and meet the growth targets in accordance with the NPS:UDC. The proposed amendments liberalise the policy direction, therefore meeting the principles embedded in the NPS:UDC of creating development competition, enabling housing choice and opening doors and encouraging development rather than closing them.

The amendments proposed are not in conflict with Objective 4.1.2 as the Policy continues to direct growth to occur around Raglan which is an existing town.

Conclusion

In considering the proposed amendments to 4.1.18 Policy – Raglan, it has been shown that these are a more appropriate way to achieve the relevant objectives of the Waikato District Plan than the principal alternative of leaving the policy unchanged.