

**BEFORE INDEPENDENT HEARING COMMISSIONERS
APPOINTED BY THE WAIKATO DISTRICT COUNCIL**

IN THE MATTER of the Resource Management Act 1991
(**RMA**)

AND

IN THE MATTER of the Proposed Waikato District Plan

BETWEEN **RANGITAHU LIMITED**

Submitter [No. 343]

AND

WAIKATO DISTRICT COUNCIL

Local Authority

**EVIDENCE-IN-CHIEF OF
RACHEL VIRGINIA DE LAMBERT FOR RANGITAHU LIMITED
(LANDSCAPE ARCHITECTURE)**

Dated: 17 February 2021

Solicitors on Record

BURTON PARTNERS
SOLICITOR — TONY NICHOLSON

PO Box 8889, Symonds Street, Auckland 1150, DX CP24147
P 09 300 3775 F 09 300 3770 E jeremy.carr@burtonpartners.nz

Counsel

Dr R A MAKGILL
BARRISTER

PO Box 77-037, Mt Albert, Auckland 1350
P 09 815 6750 E robert@robertmakgill.com

CONTENTS

INTRODUCTION, QUALIFICATIONS AND EXPERIENCE	3
CODE OF CONDUCT	3
BACKGROUND	4
RAGLAN	5
A LANDSCAPE LED APPROACH TO GROWTH IN RAGLAN	6
THE RANGITAHU STRUCTURE PLAN	7
EXPERIENCE WITH SCALES OF SPATIAL/STRUCTURE PLANNING.....	9
<i>Drury – Opāheke and Pukekohe – Paerata Structure Plans</i>	<i>8</i>
SPATIAL PLANNING TO GUIDE FUTURE GROWTH IN RAGLAN	10
ISSUES RAISED IN S 42A FRAMEWORK REPORT	12
PROPOSED FUTURE URBAN ZONE.....	13
CONCLUSION	16

INTRODUCTION, QUALIFICATIONS AND EXPERIENCE

1. My full name is Rachel Virginia de Lambert. I am a Landscape Architect and Partner at Boffa Miskell Limited (Boffa Miskell), Landscape Architects, Planners, Ecologists and Urban Designers. I have a Bachelor of Horticultural Science and post graduate Diploma in Landscape Architecture (with Distinction) both from Lincoln College (as it then was). I have practised as a landscape architect for more than 30 years.
2. I am a Fellow and Registered Member of the New Zealand Institute of Landscape Architects, Tuia Pito Ora (**NZILA**) and am a past member of the elected Executive of the NZILA. I was the Registrar for the NZILA in relation to the administration of the Institutes Registration programme from 2001 until 2010.
3. On graduating, I worked for the Department of Lands and Survey and then the Department of Conservation in Auckland, following which I joined Boffa Miskell, first in Christchurch and then in Auckland. In September 1999, I established the Tauranga office of Boffa Miskell. In December 2001, I returned to work in the Boffa Miskell Auckland office, working primarily in the Auckland, Bay of Plenty, Hawkes Bay and Waikato regions.
4. I have provided evidence at Council and Environment Court hearings on a wide range of landscape and open space related projects including Plan Changes and projects for Resource Consent for greenfield and brownfield development comprising residential, commercial, open space and industrial landuses, for age care facilities, retail and mixed-use development, masterplanned communities, port related activities, roading, water treatment and other infrastructure projects.

CODE OF CONDUCT

5. I have read the Environment Court Code of Conduct for expert witnesses and agree to comply with it.
6. I confirm that the topics and opinions addressed in this statement are within my area of expertise except where I state that I have relied on the evidence

of other persons. I have not omitted to consider materials or facts known to me that might alter or detract from the opinions I have expressed.

BACKGROUND

7. I have been retained by Rangitahi Limited to prepare a statement of evidence on its submission on the Proposed Waikato District Plan (**pWDP**) seeking provision for future urban growth in Raglan West.
8. I am familiar with the Raglan West area and surrounding environment having been involved in a number of plan change, district and regional plan submission, and resource consent related matters within and surrounding Raglan and Whale Bay. I have visited Raglan on innumerable occasions visiting the township, surrounding roads, and landholdings. I have also observed the settlement and surrounding area from a boat along the coastal shoreline and within the harbour.
9. More particularly, I have assisted the Raglan Land Company Ltd and Rangitahi Ltd since around 2010 in respect of the plan change for the Rangitahi Peninsula landholding; resource consents and landscape design associated with the upgrade of Oporuru Road upgrade; and previous submissions to the Proposed Waikato Regional Policy Statement (March 2012).
10. In undertaking this work, I have undertaken landscape analysis of the wider Raglan landscape as well as that of the established settlement. I have previously presented evidence in respect of these matters. I have worked alongside Urban Designer James Lunday and members of his former practice, Common Ground in some of this work.
11. I participated in the workshop held by Waikato District Council (**WDC**), facilitated by Isthmus landscape architects, on 11 March 2020 which informed the preparation of the 'Raglan Character Study' (22 April 2020).
12. In preparing this evidence-in-chief (**EIC or evidence**) I have read the following documents:
 - (a) Rangitahi's submission and further submission on the pWDP;

- (b) The other EIC on behalf of Rangitahi;
- (c) The s.42A Framework Report;
- (d) The Raglan Character Study prepared for WDC by Isthmus, landscape architects, (22 April 2020);
- (e) Raglan Naturally: Community Plan 2020; and
- (f) Previous evidence prepared by me in respect of both the Proposed Regional Policy Statement and Rangitahi Peninsula plan change including associated background documentation. In particular, the 'Raglan a Landscape Framework' document (2010).

RAGLAN

13. Raglan is a coastal settlement with a special character and qualities that clearly set it apart from the more urban settlements in the Waikato, or indeed, other small rural or coastal settlements in the region. It is a distinctive small community fragile to change and deserving of a well-considered, place specific, strategy for growth. There are many qualities that make Raglan special. They include:
- (a) The landscape context of the settlement and its relationship to harbour, coast, and mountain (Mt Karioi).
 - (a) The coastal landform that underlies the settlement, its series of peninsula landforms, indented harbour, and topography.
 - (b) The cultural history and associations of the locality and the spiritual connection and values of its landscape.
 - (c) The stages of urban growth of the settlement and the consequent pattern of roading, lot sizes, and building typologies.
 - (d) The way in which the indentations of the harbour and topography create separate communities within the township reinforced by the different eras of growth.

- (e) The coastal / holiday destination character of the township and the association of Raglan with an internationally recognised surfing destination and associated lifestyle qualities.
14. Raglan is anticipated to accommodate considerable growth over the coming years. The Raglan Development Plan (contained in Waikato 2070) growth projection refers to a possible population of 12,500 people in 2070. As the EIC of Dr Doug Fairgray notes, however, Raglan has current capacity for growth within zoned areas within the next 10 years. Hence, there is time to plan appropriately for growth to secure a desirable future form of development and associated infrastructure for the long term.
15. An appropriate form of future growth for Raglan, growth that supports rather than detracts from the character of the settlement, needs to be guided by a comprehensive planned approach that avoids ad-hoc or incremental growth which, through a process of 'death by a thousand cuts', leads to the loss of the very qualities, relationships and characteristics that are distinctive to Raglan and valued. Future growth should respond to the location specific characteristics of Raglan, not apply generic / district wide approaches which promote an urban intensification model more appropriate to cities, larger urban centres, or other rural communities and growth centres across the Waikato.
16. Because Raglan is within commuter distance of Hamilton, it is also fragile to the prospect of becoming a dormitory suburb of the city. It is important that such growth avoids turning Raglan into an offshoot of suburban Hamilton and instead reinforces a distinctive residential location which builds on the particular landscape, environmental, cultural and settlement qualities of Raglan.

A LANDSCAPE LED APPROACH TO GROWTH IN RAGLAN

17. In preparing this evidence I have again collaborated with urban designer James Lunda. We have both updated our analysis, in our EIC, of Raglan's landscape and distinctive character presented initially in 2010.

18. As I did in 2010, I would like to use a graphic presentation to describe the qualities of Raglan landscape and in doing so advocate for a comprehensive spatial planning approach to inform future urban expansion of Raglan including 'Raglan West'. I consider it is only through such a locality specific and comprehensive, landscape led approach that the following can be achieved:
- (a) the necessary environmental protection and enhancement;
 - (b) the appropriate nature and siting of future urban development; and
 - (c) an appropriate urban form of future development, including ensuring adequate and appropriately located open space, roads, walkways and cycleways to provide desirable connectivity and support recreational as well as functional modes of transport; as well as securing appropriate development areas.
19. I would advocate for the use of a well-established ecologically based approach to spatial planning following that advocated by Ian McHarg in his seminal book 'Design with Nature' (1969). Such an approach maps the relevant physical, ecological and cultural factors influencing a landscape and determines appropriate conservation, enhancement and development outcomes based on a full understanding of the landscape. This approach is independent of land ownership and fits development, including the siting of infrastructure, such as roads, in response to the landscape and comprehensive land management, environmental, and social / community outcomes. Much of the groundwork for this type of place based spatial planning for Raglan has been initiated and / or is in place through 'He mahere hāpori whānui o Whaingaroa, Raglan Naturally our community' (February 2020) and the 'Raglan Character Study' (April 2020). I note that the evidence for Rangitahi makes the distinction between the higher level 'spatial planning' at the scale of Raglan as a whole and 'structure planning' at a more detailed growth area or site scale. In my view, structure planning would refine and deliver on the intent of the higher-level spatial plan.
20. ***Power Point presentation Annexure A.***

THE RANGITAHU PENINSULA STRUCTURE PLAN

21. The first stages of the Rangitahi Peninsula development have now been implemented, and whilst it is still 'early days' in respect of the future built form of development, I consider that the benefits of a comprehensive, finer grained, structure plan approach to development within the site are already evident in this new urban growth area of Raglan. This is particularly due to the:
- (a) land which has been set aside from development for environmental enhancement including coastal and gully areas, the retention of copses of established trees, and the provision of walkway access around the peninsula / future community and to the coast;
 - (b) way in which the roads and lots have been sited sensitively relative to the landform; and
 - (c) provision of a range of lot sizes and residential densities that respond to topography and the opportunities for community creation / mixed use.
22. The Rangitahi Peninsula development also in my opinion demonstrates the benefit of avoiding the application of Council's generic suburban engineering standards. Instead, the design of its roadways, walk and cycleways, and stormwater management systems have sought and delivered, a more local, informal, Raglan, character and amenity with improved environmental and aesthetic outcomes. It would be desirable for the District Plan to provide the direction for engineering standards to be relevant to the character of the location rather than requiring a standardised approach. At present there is considerable cost to individuals who seek to secure a better / more appropriate, location specific outcomes. Furthermore where the generic standards are being applied to new development there have been clear detrimental impacts on the character and identity of Raglan.
23. I attended the Community consultation led by Isthmus, on Wednesday 11 March 2020, in respect of the Raglan Character Study (April 2020). I note that a key component of the community feedback at a site specific 'character' level was the undesirable and counter to character outcomes of applying a number of Council's standards. The community identified standards such as

requirements for paved on-site parking and turning courts, kerb / channel, and related roading standards as matters of concern. The difficulty and cost of challenging these standards was also noted.

EXPERIENCE WITH SCALES OF SPATIAL / STRUCTURE PLANNING

24. I have experience of working in a number of locations where Council has led higher level 'spatial planning' (noting that in some cases these plans are called 'structure plans') processes including analysis of the landscape resource, infrastructure requirements / options, alongside community input following which landowners collectively, or on an individual basis, have led further site investigation and structure planning / masterplanning to propose private plan changes for live zones and or resource consents to enable proposed urban greenfield development. One example of this is the Hamilton City Peacocke Structure Plan and the more detailed masterplanning for the Amberfield 1000 lot residential development.

Drury – Opāheke and Pukekohe – Paerata Structure Plans

25. In Auckland I am involved in a number of plan change, and resource consent processes within the south of Auckland, where urban growth is being informed by Auckland Council's structure plans, the Drury – Opāheke and Pukekohe - Paerata Structure Plans. These are both areas where the Auckland Plan and Unitary Plan have identified through analysis and the application of 'Future Urban' zones (**FUZ**) that significant urban growth will be accommodated.
26. In my opinion, Council led, high level, spatial planning (Structure Plan), including the identification of important social, cultural and environmental outcomes to be delivered through landuse change leads to better outcomes than those resulting from more ad-hoc landuse change through individual private plan change or resource consent processes where this overarching spatial plan is not in place. The spatial planning process, in my opinion, engenders a good level of community awareness, and to a large extent "buy in" to future landuse change.
27. With respect to landscape, when subsequent plan changes or resource consents are brought to accommodate growth the spatial plan provides clear direction in respect of important landscape features and values to be avoided

/ retained / protected and enhanced as well as guiding the form of development including the location of roads, open space and lots such that development is well coordinated and achieves desired, comprehensive, outcomes beyond the interests of a single landowner. Further finer grained structure planning / masterplanning is required but the bigger picture outcomes have been identified to be delivered in the finer grain processes.

SPATIAL PLANNING TO GUIDE FUTURE GROWTH IN RAGLAN

28. Council and the Raglan community have already laid much of the groundwork for spatial planning to manage future urban growth in the settlement including the Raglan Naturally: Community Plan 2020 and its established community network and the recent Raglan Character Study (April 2020).
29. As stated in the Raglan Character Study, “*much of Raglan outside of the town centre is covered by district wide provisions which do not fully protect the unique identity, characteristics and attributes of the settlement*”¹. The report recommends that there are special characteristics within and surrounding Raglan that are specific to the area and are worthy of identification and protection through the Waikato District Plan. A spatial planning process to guide future growth in Raglan West, as well as in the settlement as a whole, would enable the appropriate recognition, protection, and enhancement of these features and characteristics.
30. Adoption of a McHargian, landscape-based analysis and spatial plan approach would identify appropriate forms of land management within the catchments that define Raglan, leading to appropriate zoning. At a finer grain appropriate alignment for key connecting roads and other infrastructure, as well as areas that should be set aside from development, protected and enhanced to achieve holistic catchment management outcomes, including protection of harbour water quality and enhancing ecological and cultural landscape values.

¹ Raglan Character Study, 22 April 2020 prepared by Isthmus for WDC, Executive Summary, pg3.

31. Once the spatial framework is established, urban design analysis and measures to retain the character of the urban form of development, in keeping with the identified qualities of Raglan, can be applied including development that standards deliver bespoke, place specific outcomes which support the distinctive qualities and established character of Raglan.
32. It is already apparent that the nature of Raglan's surrounding topography, the steepness and stability of much of the catchment, the presence of important cultural sites and values, the pattern of hydrology, vegetation and ecological corridors as well as the settlement's important visual and physical relationship to Karioi limit the options for future population growth and the infrastructure required to comprehensively support growth. Proper analysis of these factors through spatial planning should ultimately determine an appropriate approach to accommodating growth and the resultant capacity for growth in Raglan.
33. As identified in the Raglan Development Plan (contained in Waikato 2070) the western quadrant of Raglan (refer Figure 1 below), following on from the development of the Rangitahi Peninsula, provides the greatest potential and opportunity for growth of the settlement whilst protecting the coastline and acknowledging the range of constraints. The area identified for growth includes land south of Rangitahi as well as land further west.

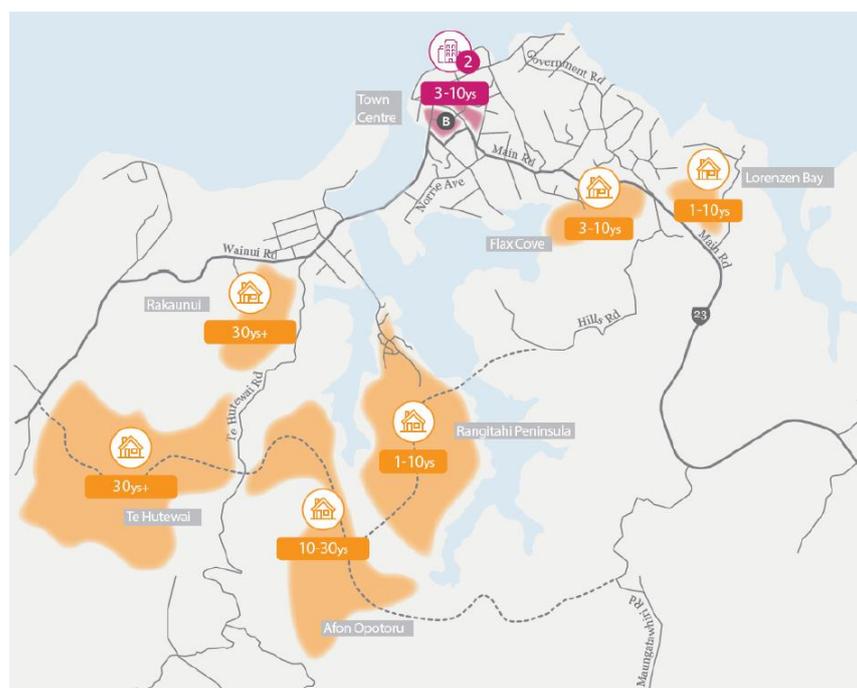


Figure 1: Raglan Development Plan (Waikato 2070)

34. The southern and western expansion of the Raglan settlement aligns with the submission by Rangitahi Limited, refer Figure 2 below.

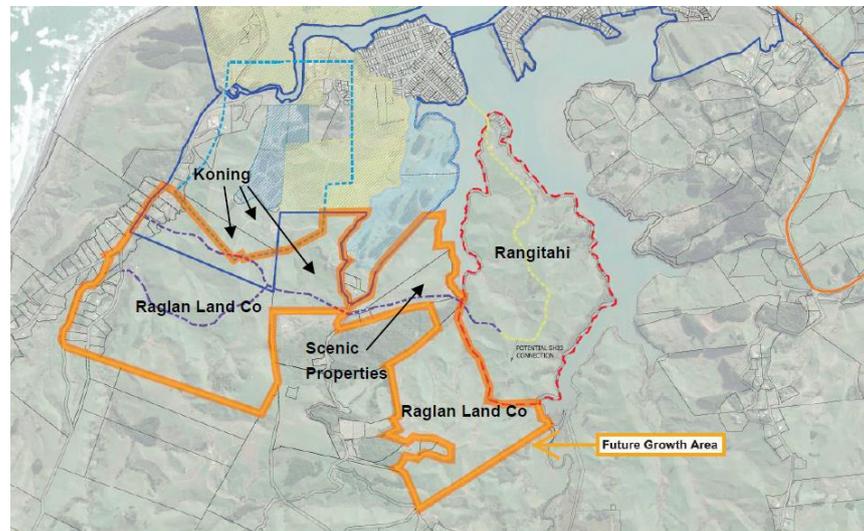


Figure 2: Future Growth Area Identified in Rangitahi Limited's Submission

35. Given the available land within Rangitahi and other zoned areas to accommodate current population growth in the next 5-10 or so years, aligned with the timeframes identified in Waikato 2070, there is adequate time for Council to progress a comprehensive, high level spatial planning process, to determine an appropriate form of development / landscape protection in the west of Raglan before such land is required to meet demand and more detailed site structure planning / masterplanning is undertaken to realise urban zones and subsequent urban development.

ISSUES RAISED IN SECTION 42A FRAMEWORK REPORT

36. Council's s.42A Framework Report², referencing policies 4.1.3 combined with Sections 1.5.2 and 1.5.4, supports a co-ordinated approach to urban development including the use of 'structure planning' and master planning processes that involve community engagement.
37. I support and endorse this approach, recognising that I would term the wider Raglan and surrounds phase led by Council to be 'spatial planning'. I consider this comprehensive overview step to be particularly relevant to Raglan given

² Section 42A Report, Proposed Waikato District Plan, Hearing 25 Zone Extents, Framework Report, 19 January 2021, Paragraph 57

the qualities of the established settlement, the character of the settlement's coastal landscape, with its associated cultural values, and the opportunity to maintain a distinctive future whilst accommodating urban growth. I consider Council leadership in such processes to be essential, as also noted in the Framework Report, para. 57. Where Council's resources are not focussed on communities with demand for growth, these processes will fall to landowners in either individual or potentially collaborative ways. However, without the comprehensive overview offered by a spatial plan, a well-planned and co-ordinated 'best of the environment and community overall' approach may not be achieved and the special qualities of Raglan undermined.

38. Notwithstanding, the benefit of higher order spatial planning to set the framework for long term 30 to 50 year + growth, I consider the evolving Rangitahi Peninsula development to provide a successful example of a landowner lead, comprehensive structure planning and private plan change process that delivers beneficial environmental, cultural, and open space / recreational and urban character / quality outcomes alongside urban development and housing delivery.

PROPOSED FUTURE URBAN ZONE

39. I understand Council, through its additional s.42A Report to the Zone Extents hearing, to be recommending the introduction of a Future Urban Zone (**FUZ**) into the PWDP to provide Council / landowners the opportunity to signal a planned response to urban growth based on appropriate structure planning, infrastructure provision and logical staged development.
40. Given the potential for land to be zoned FUZ, Rangitahi Ltd requested Boffa Miskell to undertake high level mapping analysis and preliminary structure planning to determine the suitability of land to the south of the Rangitahi Structure Plan development for future urban growth. The land that is the subject of this analysis is within part of the Afon Opotoru area in Waikato 2070 which is identified with a 10–30 year development timeframe. It is the next growth cell identified following the Rangitahi Peninsula growth cell which has a 1–10 year development timeframe in Waikato 2070.

41. This analysis is illustrated in the Graphic Supplement presentation (refer Annexure A pages 20 - 29).
42. It is my opinion that the Rangitahi Peninsula urban development area could be extended south, initially through the inclusion of the approximately 51ha land area identified within a 'Future Urban Zone' and with further detailed structure and master planning through resource consent for development consistent with the general form of development undertaken to date.
43. We have undertaken an initial, very high-level process of structure planning to identify potential areas within the southern portion of the existing Rangitahi Peninsula Zone not yet included within the Rangitahi Structure Plan and the suggested FUZ to the south of this, as illustrated below, refer Figure 3.
44. This analysis suggests that there is some 30.7ha of land that could become available for urban development in Rangitahi South (within the FUZ and southern portion of the Rangitahi Peninsula Zone). Indicatively such an extension could yield between 370 and 460 additional dwellings based on 12dw/ha / 15dw/ha average densities respectively within the pockets 1 through 4 identified. In addition, some larger lots could sit outside the areas with potential for more urban residential densities.
45. I further note, as set out in the planning EIC of Mr Inger, that Rangitahi is in the process of updating the masterplan for future development within around the existing development precincts in the Rangitahi Peninsula Zone with the possibility that consents will be sought, as a Discretionary Activity, for a total higher yield than 550 dwellings (the Structure Plan anticipates 500 – 550 dwellings). I consider this review of development potential within the Rangitahi Peninsula to be a logical additional step to determining whether some additional yield within the established area is able to be accommodated before further greenfield land is released for urban expansion. The Rangitahi Structure Plan includes significant areas of 'rural' open space, some of which may accommodate development without losing the intended open space, ecological, and cultural landscape structure of the development overall. Increases in density may also be able to be achieved in suitable areas through comprehensive development lots.

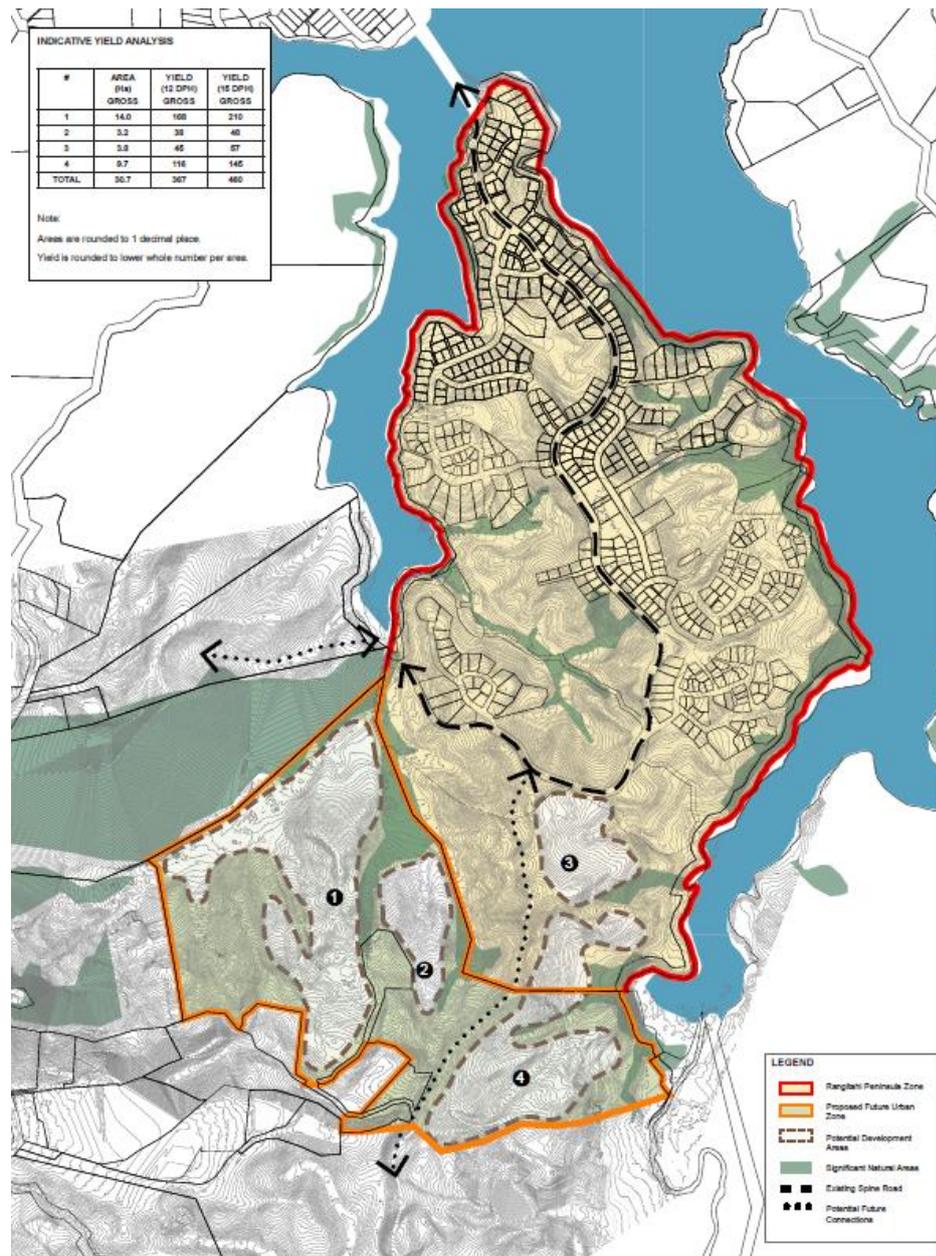


Figure 3: Proposed Future Urban Zone and potential pockets of urban development within the FUZ and Rangitahi South.

46. The area of FUZ identified in Rangitahi South will further contribute available land for quality, place based, urban growth in Raglan. Its location adjacent to the existing Rangitahi Structure Plan area will enable a continuous urban form and very good access to open space and neighbourhood facilities.
47. Providing certainty in respect of this land gives the opportunity for more comprehensive future structure planning to confirm either FUZ or live urban zones in those potential development areas further to the west including the

remainder of the 10–30yrs Afon Oporu west of the proposed FUZ and 30yrs+ Te Hutewai and Rakaunui areas. There are more significant infrastructure considerations to be addressed with these areas including transport and 3 waters considerations that will benefit from co-ordinated and appropriately sequenced structure planning and development agreements.

CONCLUSION

48. In summary, I conclude that:
- (a) Raglan deserves and requires a sensitive approach to future growth which responds to the strong landscape and historical settlement characteristics of the settlement. High level, Council-led spatial planning is the appropriate tool to ensure good outcomes from urban growth.
 - (b) Raglan is not just a small town like any other in the Waikato, nor is it just like Hamilton. Growth can be accommodated here in a way that maintains the special qualities of the town and indeed enhances and reinforces those distinctive local characteristics for future generations.
 - (c) In my opinion, it is flawed to adopt a blanket approach to urban future development across the district. In particular, the special places of character and identity such as Raglan need an approach that is based on the local qualities of place.
 - (d) Real opportunities exist to achieve appropriate and very desirable growth outcomes for Raglan, both in terms of more urban and rural living opportunities.
 - (e) Comprehensive high-level Council-led spatial planning dropping down to more detailed, individual and / or collaborative, landowner led structure planning, and by inference the avoidance of cumulative ad-hoc subdivision, is crucial to securing the desired social, cultural, and environmental outcomes for Raglan and for ensuring Raglan retains its reputation as a distinctive, attractive, coastal settlement.

- (f) An approximately 51ha area in Rangitahi South has the potential, in respect of its landscape values, for future urban development including achieving desirable landscape / environmental / cultural landscape and Raglan character outcomes. It is suitable for this land to be identified as FUZ under the WDP. Through initial, high level analysis, this land, along with land within the southern part of the existing Rangitahi Peninsula urban zoned land (as of yet undeveloped), could yield some 30.7ha of land for urban development at a range of densities. Indicatively, such an extension could yield between 370 and 460 additional dwellings based on 12dw/ha / 15dw/ha average densities respectively.

Dated this 17th day of February 2021

Rachel de Lambert