

**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 **RANGITAHİ LIMITED**

Submitter [No. 343]

AND **WAIKATO DISTRICT COUNCIL**

Local Authority

**EVIDENCE-IN-CHIEF OF
BEN MAXWELL INGER FOR RANGITAHİ LIMITED
(PLANNING)**

Dated: 17 February 2021

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INTRODUCTION, QUALIFICATIONS AND EXPERIENCE

1. My name is Ben Maxwell Inger.
2. I am a Senior Planner and Director at Monocle, in Hamilton. I hold the qualifications of Bachelor of Planning (Honours) from the University of Auckland. I am a Full Member of the New Zealand Planning Institute.
3. I have 14 years' planning experience. Over this time, I have been employed in private consultancies working for both private and public sector clients, including developers and local authorities in the Waikato region. In my previous role at Harrison Grierson, which I held until November 2020, I was responsible for managing the company's operations in the Waikato region.
4. My experience includes preparation of plan changes and submissions and planning evidence related to proposed district plans, as well as preparation and processing of resource consent applications for residential, commercial and infrastructure projects. I am a current member of Hamilton City Council's Urban Design Panel.
5. I led the preparation of the applications for the Rangitahi Precinct B and D resource consents in 2017. The land use and subdivision consents were granted in April 2018 for a total of 175 residential lots, as well as recreation reserves, walking and cycle connections, roads to vest, and farm lot ecological enhancement. I also provided planning evidence for Rangitahi Limited (**Rangitahi**) in relation to Hearing 23 which dealt with PWDP provisions for the Rangitahi Peninsula Zone, and I presented in relation to Rangitahi's submissions at the Future Proof (Phase 1) and Waikato 2070 hearings.
6. I have been retained by Rangitahi to prepare a statement of evidence on its submission on the Proposed Waikato District Plan (**PWDP**) for the Zone Extents hearing.
7. I visit Raglan regularly and I am familiar with the township, including the Rangitahi Peninsula and surrounding environment. I have visited the Rangitahi site on numerous occasions over the past 2-3 years, and I have visited land owned by the Raglan Land Company Ltd which is located south of the Rangitahi Peninsula and east and west of Te Hutewai Road (hereafter referred to in my evidence in general terms as Raglan West).

8. 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 (my former colleague Michael Briggs prepared the submissions);
 - (b) The EIC of Dr Douglas Fairgray, Ms Rachel de Lambert, Mr James Lunday, Mr Ray O'Callaghan, Mr Ian Clark and the statement of Mr David Peacocke for Rangitahi;
 - (c) Waikato 2070 Economic and Growth Strategy (**Waikato 2070**) (May 2020);
 - (d) The Raglan Character Study (April 2020);
 - (e) WDC's s32 report (Strategic Direction and Management of Growth);
 - (f) WDC's s42A Framework report; and
 - (g) WDC's s42A Future Urban Zone report.

CODE OF CONDUCT

3. I have read the Environment Court Code of Conduct for expert witnesses and agree to comply with it.
4. 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.

OVERVIEW

Terms Used in Evidence

9. Key terms that I use in my evidence to describe specific areas are set out below for clarity:
- (a) Raglan West – the general area located west of the one-way bridge over the Whaingaroa Harbour inlet, encompassing the existing urban area (including the Rangitahi Peninsula), the Future Growth Area identified on

the plan under **annexure D**, the undeveloped Rakaunui land which is zoned Residential under the PWDP, and features such as the golf course, campground, aerodrome and wastewater treatment plant.

- (b) Future Growth Area – the area identified as Future Growth Area on the plan under **annexure D**. The main landowners are Raglan Land Company Ltd, Scenic Properties 2006 Ltd, Koning, Moana/Seymour/Steel, and WDC. The plan under **annexure D** has been included in Rangitahi's submissions to Future Proof (Phase 1), Waikato 2070 and the PWDP.
- (c) Rangitahi Peninsula – the area which is within the Rangitahi Peninsula Zone and which is subject to the Rangitahi Structure Plan under the PWDP.
- (d) Rangitahi South – the area located immediately south of the Rangitahi Peninsula which is shown on the plan under **annexure A** and is proposed in Rangitahi's evidence to be rezoned from Rural to Future Urban.
- (e) Afon Opotoru – a term referred to in the Raglan Development Plan in Waikato 2070 to describe a future residential growth area, with a 10 to 30-year timeframe, which includes Rangitahi South as well as additional land immediately east of Te Hutewai Road.
- (f) Te Hutewai – a term referred to in the Raglan Development Plan in Waikato 2070 to describe a future residential growth area, with a 30 plus year timeframe, which includes land located between Te Hutewai Road and Wainui Road.

Rangitahi Structure Plan

- 10. Rangitahi and associated Peacocke landholding companies (Raglan Land Company Ltd and Scenic Properties 2006 Ltd) have been actively involved in Raglan growth planning processes since around 2010 when Waikato District Council (**WDC**) began preparation of a Raglan Structure Plan. The Raglan Structure Plan was the subject of a Council led Plan Change which was notified in 2010 but subsequently withdrawn in 2011.
- 11. The withdrawal of the Raglan Structure Plan by WDC resulted in Rangitahi leading preparation of the Rangitahi Structure Plan to enable development of the Rangitahi Peninsula for predominantly residential activities. The structure plan and related provisions were introduced into the Operative Waikato District Plan (**OWDP**) through a private plan change (**Plan Change 12**)

initiated by the Raglan Land Company Ltd, which was made operative in 2015. The plan change involved rezoning the land from Rural Zone to Rangitahi Living Zone.

12. The Rangitahi Structure Plan enables an environmentally sensitive approach to development of the Rangitahi Peninsula in accordance with landscape management, urban design, and structure planning best practice. It responds to the site's setting, the wider environment, and Raglan's special character. The Structure Plan includes seven development precincts (Precincts A-G), rural balance lots for farming and an extensive network of reserves and walkways. The Structure Plan's total land area is approximately 97 hectares. The total development area within the Structure Plan's seven precincts is approximately 31 hectares.
13. Resource consents have been granted to date for Precincts A, B and D, totalling 271 residential lots. Titles for Precincts A and part of Precinct B were issued in mid-2020 and the first houses are under construction, some 10 years or so after processes to consider rezoning of the Peninsula commenced. Mr Peacocke's statement sets out that demand for the residential lots has been strong and that he expects that subdivision of the Structure Plan area will be fully completed (to issue of titles) within approximately 5-10 years.
14. The Rangitahi Structure Plan anticipates a total of 500-550 dwellings. However, Mr Peacocke's statement explains that Rangitahi is considering opportunities for increasing the total yield within the Structure Plan area, including through increasing densities in suitable areas in and around the development precincts shown on the Structure Plan. The master plan review is being undertaken approximately 10 years after planning for rezoning began based on reassessment of density and opportunities with experience of demand, sales, and development. It is possible that the total number of dwellings within the current precincts identified on the Rangitahi Structure Plan could be approximately 650 rather than 500-550 subject to the necessary resource consents being obtained.
15. Subdivision and development involving more than 550 dwellings is a Discretionary Activity under the PWDP provisions for the Rangitahi Peninsula Zone which was agreed between myself and WDC's planner during Hearing 23 – Rangitahi.

16. Further to this, the analysis which is attached to Ms de Lambert's EIC identifies potential additional development precincts within the southern part of the Rangitahi Peninsula Zone which are not currently shown in the Rangitahi Structure Plan. The analysis identifies the opportunity to comprehensively plan for future stages of development of the southern part of the Rangitahi Peninsula as well as the adjoining Rangitahi South area.

Raglan Growth Demand and Supply

17. Rangitahi made submissions to Future Proof (Phase 1 update), Waikato 2070 and the PWDP, all of which have emphasised the strong growth experienced at Rangitahi and the need to plan for additional growth in Raglan in the medium to long term. I provided planning advice to Rangitahi in respect of the Future Proof (Phase 1 update) and Waikato 2070, including presenting at the hearings on Rangitahi's behalf.
18. While Rangitahi's submissions to date have largely relied on their own experience of sales for the Rangitahi development, recent revisions to population projections through work undertaken by the National Institute of Demographic and Economic Analysis (**NIDEA**)¹ which are referred to in the EIC of Dr Fairgray have confirmed the strong demand for dwellings in Raglan and that this is projected to continue. Waikato 2070 also recognises strong future growth by identifying a possible future population for Raglan of 12,500 residents in 2070, which represents a significant increase from the current population of approximately 4,000. The population projections for strong growth back up Rangitahi's 'on the ground' experience.
19. Dr Fairgray's EIC concludes that there will be demand in Raglan for 520-620 dwellings in 2020-2030 and an additional 690-1,010 dwellings in 2030-2050. The total assessed demand for the 30-year period 2020-2050 is 1,210-1,630 dwellings². This compares with residential growth allocation in the Future Proof Sub-Regional Growth Strategy (2017) of 386 households in 2016-2025, 122 households in 2026-2035 and -82 households in 2036-2045³. The total

¹ Update of Population and Family and Household Projections for Waikato District 2013-2063, August 2020.

² The ranges reflect the differences between the medium-growth and high-growth scenarios.

³ Future Proof, Table 3: Future Proof sub-region allocation and staging of residential household growth 2016 – 2045 (summary table).

Future Proof allocation for the 30-year period 2016-2045 is therefore 508 households.

20. Dr Fairgray's demand analysis includes holiday homes, which make up approximately 25% of existing dwellings in Raglan, and the competitiveness margins required under the National Policy Statement on Urban Development (**NPS-UD**).
21. Dr Fairgray's capacity analysis confirms there is sufficient existing land supply for the next 10 years within existing urban zoned areas of Raglan under the notified PWDP to meet the projected demand. Demand can be met through capacity for approximately 1,085 additional dwellings in the 2020-2030 period within Rangitahi Peninsula, Flax Cove, Lorenzen Bay and infill development (including the Town Centre). The Residential zoned land at Rakaunui is not factored into the 2020-2030 capacity. That is because the land is Maori Freehold Land and it is likely to have a longer development timeframe.
22. The capacity analysis assumes 501 dwellings at Rangitahi Peninsula (i.e. within the Rangitahi Peninsula Zone) in the 2020-2030 period. As I have explained, there is potential for the supply at Rangitahi Peninsula to be approximately 650 dwellings so the total supply for Raglan in the 2020-2030 period within existing zoned areas in the PWDP may be approximately 1,200 dwellings rather than 1,085 dwellings which would satisfy the projected demand for 520-620 dwellings over this period. This is provided development within all the Rangitahi Peninsula, Flax Cove and Lorenzen Bay growth areas proceeds and infill development occurs.
23. However, the capacity analysis concludes that the zoned land is insufficient to meet the total long-term demand of 1,210-1,630 dwellings to 2050⁴. Dr Fairgray's analysis concludes that a shortfall would occur in the mid-2030s based on the high-growth scenario and in the mid to late-2040s for the medium growth scenario. He considers that by 2040 in the medium-growth scenario total demand will be within 5% of total capacity.

⁴ This includes the required 'long-term' competitiveness margin of 15% in accordance with the NPS-UD.

24. I consider that, prior to that time, there will be a need for more land to be 'live-zoned' and serviced to meet demand. Beginning to plan for this long-term growth now is a sensible approach.

Raglan's Infrastructure

25. Rangitahi has constructed significant infrastructure already to service existing development within the Rangitahi Peninsula, including a new bridge to the peninsula, upgrades to Opotoru Road and local water and wastewater mains networks. The EIC of Mr O'Callaghan and Mr Clark confirms that this infrastructure is suitable for servicing future growth in Rangitahi South with necessary extensions.
26. However, there are some other infrastructure challenges in Raglan. Mr O'Callaghan's and Mr Clark's EIC confirms these impediments are not insurmountable.
27. WDC's resource consents for the town's wastewater treatment plant expired in February 2020. An application to continue treatment based on the status quo marine discharge was made to Waikato Regional Council (**WRC**) in November 2019 for a short-term 3-year period. I understand that WDC is currently preparing applications for long-term discharge and that upgrades to the system will be required to meet current environmental standards for treatment and disposal.
28. At the time of writing, WDC has not confirmed a preferred wastewater solution and the timing and cost to construct the upgrades is unknown. WDC's current LTP 2018-2028 signals potential design/construction for 2023-2024 and notes that a decision on implementation is due to be made in the LTP 2021-2031. As a major landowner in the area, Rangitahi (and associated landholding companies) has had discussions with WDC regarding the potential for a land-based wastewater disposal system. However, I understand that marine discharge is also being considered by WDC.
29. I understand that the main potential constraint for water supply is likely to be storage and the required solution is an additional reservoir to service the town. The reservoir is not included in the LTP 2018-2028. I have been advised that Rangitahi supports the reservoir being funded in the LTP 2021-2031 because

it will be required in the near future to service new development in areas of urban zoned land as well as future growth areas.

30. The other key infrastructure issue for Raglan is the one-way bridge across the Whaingaroa Inlet which separates Raglan West from Raglan East. The LTP 2018-2028 identifies the existing structure is nearing the end of its useful life and that the single lane results in delays at peak times⁵. Although the expenditure type is identified as renewal and Level of Service (i.e. not as growth related expenditure) the potential for unexpected development in Raglan and growing visitor numbers increasing safety issues or delays at peak times is referred to as a risk/uncertainty. The LTP 2018-2028 signals potential design/construction of a preferred new two-lane bridge for 2023-2026 and notes that a decision on implementation is due to be made in the LTP 2021-2031.

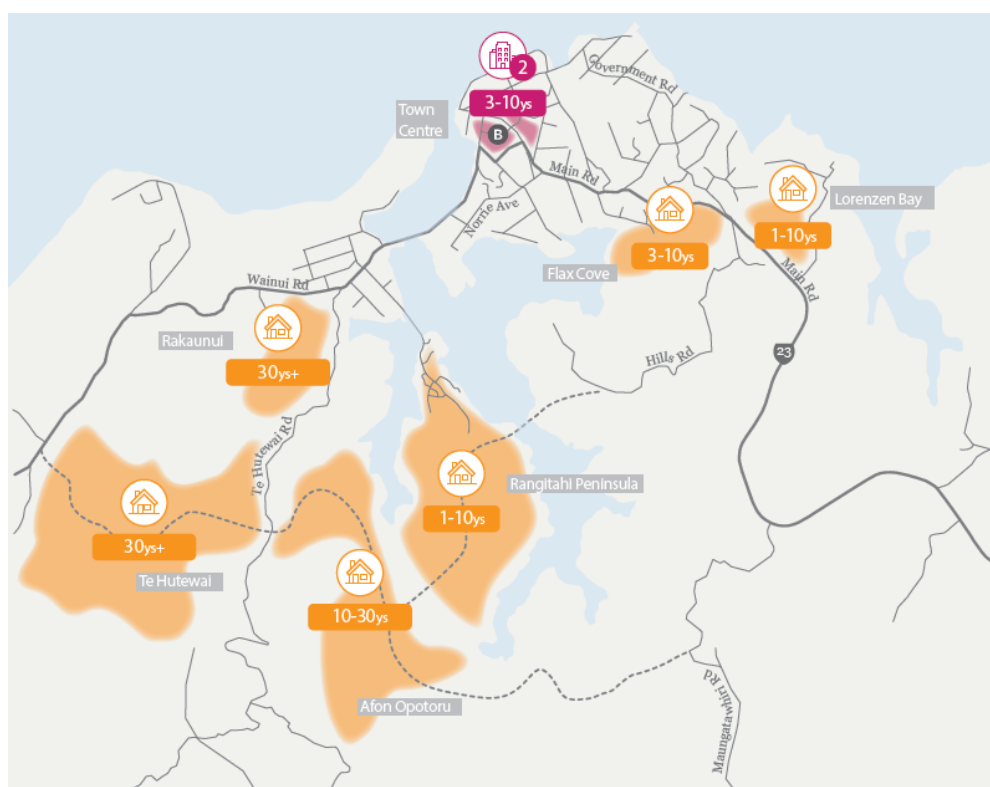
Raglan West Growth Areas

31. A key focus of Rangitahi's submissions into the Future Proof Phase 1 update, Waikato 2070 and the PWDP has been the potential for a medium to long term growth area in an area of Raglan West which extends from the Rangitahi Peninsula to Wainui Road. This area is referred to as the Future Growth Area on the plan under **annexure D**. The plan shows current landowners of the main landholdings, including Raglan Land Company Ltd, Scenic Properties 2006 Ltd, Koning, Moana/Seymour/Steel, WDC and others.
32. The Future Growth Area is closely aligned with the Afon Oporu and Te Hutewai residential activity areas which are identified on the Raglan Development Plan in Waikato 2070 (refer to **Figure 1** and **annexure C**). Afon Oporu and Te Hutewai are the only areas identified for future growth in Raglan to 2070 which are outside of the existing greenfield areas zoned for residential development in the PWDP.

⁵

Waikato District Council Long Term Plan 2018-2028, pg 27.

Figure 1: Raglan Development Plan (Waikato 2070)



33. The greenfield areas which are zoned for residential development in the PWDP are Rangitahi Peninsula, Lorenzen Bay, Flax Cove and Rakaunui. The Raglan Development Plan identifies that Lorenzen Bay, Flax Cove and Rangitahi Peninsula will be the development areas over the next 10 years. It also identifies that Rakaunui will provide supply in the 30 years plus period.
34. In terms of the two Rural zoned growth areas in Waikato 2070, the Afon Oporoturu growth area adjoins the Rangitahi Peninsula and is identified with a development timeframe of 10-30 years. The main landowners are Raglan Land Company Ltd, Scenic Properties (2006) Ltd⁶, Moana/Seymour/Steel and WDC. The Te Hutewai growth area is located further west and is identified with a development timeframe of 30 years plus. The main landowners are Koning and Raglan Land Company Ltd.
35. The differentiation in the planned timing between the Afon Oporoturu and Te Hutewai growth cells is important. It reflects a planned sequence of development in Raglan West progressively moving westward from the existing urban area on the Rangitahi Peninsula. Afon Oporoturu is the next

⁶ Raglan Land Company Ltd and Scenic Properties (2006) Ltd are both Peacocke landholding companies.

growth area following the areas which are zoned in the PWDP and then Te Hutewai.

36. Work undertaken as part of the Rangitahi Structure Plan and Plan Change 12 anticipated future roading connections westward from the Rangitahi Peninsula spine road and potentially eastward as well to provide a secondary access to Raglan from Maungatawhiri Road. However, at this stage, only limited investigations have been undertaken for those potential future road links.

Raglan's Special Character

37. Mr Lunday's EIC provides historical context to Raglan's growth, building on work he undertook as the urban design lead for the Rangitahi Structure Plan. He considers that some recent development has continued to detract from the character of the town and that a sensitive and comprehensively planned approach is critical to Raglan's future growth to ensure the historical urban structure, special receiving environment, and character of the town is maintained and enhanced.
38. Ms de Lambert's EIC explains that Raglan has a special character and qualities. She considers the town deserves and requires a sensitive approach to future growth which responds to the strong landscape and historical settlement characteristics of the settlement. She considers that a blanket approach should not be adopted to development across the district and that spatial planning for Raglan is crucial to securing desired outcomes and for avoiding cumulative ad-hoc subdivision in future.
39. An earlier hearing on the PWDP (Hearing 16 – Raglan) also addressed the issue of Raglan's special character. WDC commissioned a Raglan Character Study (April 2020) by Isthmus as part of the inputs into that hearing. The Raglan Character Study concludes 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"*⁷. It also concludes that *"much of Raglan outside of the town centre is covered by*

⁷

Raglan Character Study (22 April 2020), Executive Summary.

district wide provisions which do not fully protect the unique identity, characteristics and attributes of the settlement”.

40. The Character Study recommends that *“it is appropriate for the Waikato District Plan to identify and recognise the special character of Raglan, as different from the balance of the District”*⁸. It suggests a process for this, including:
- Engagement with Tainui Awhiro, through hui and other traditional means, to gain a mana whenua perspective on the historic cultural values of the area;
 - Engagement with submitters, as well as broader engagement with residents and owners of Raglan through workshops and other means to hear their views;
 - Identification of the detailed characteristics of Raglan, it’s location, place, nature and lifestyle that make it unique;
 - Development of character protection mechanisms appropriate for inclusion in the District Plan that would allow Raglan to continue to develop in a way that protects its special characteristics.
41. The Commissioner’s minute dated 8 June 2020, following the Raglan hearing, signals the potential for a comprehensive plan change process to consider the topic of the rural and coastal character of Raglan⁹.
42. I consider there is a good opportunity to expand the scope of the intended special character review and process outlined above to also provide an overarching long-term spatial framework for the growth of Raglan. This would be consistent with Mr Lunday’s and Ms de Lambert’s recommendations that a spatial planning process should be commissioned to consider both the existing and future character of Raglan and its surrounds.
43. The joint special character and growth exercise that I recommend could build on the very high-level spatial planning undertaken as part of Waikato 2070 to determine specific areas which should be protected from development due to environmental or cultural values, opportunities for landscape and ecological enhancement, and a co-ordinated plan for future infrastructure and

⁸ Raglan Character Study (22 April 2020), Section 3.2, pg 27.

⁹ Hearing Panel Minute, 8 June 2020, para 9.

community facilities provision. It would establish an overarching approach for future infrastructure planning and guide the preparation of more detailed structure plans for individual growth areas and potentially other changes to District Plan provisions for Raglan. Involvement of landowners, the community, and tangata whenua in this process would be very important.

44. It would be beneficial for the special character and growth exercise to proceed as soon as possible due to the high growth demand projected for Raglan and the absence of Raglan-specific provisions for growth under the PWDP outside of the Rangitahi Peninsula Zone.

Tangata Whenua Interests

45. Tainui Hapū has been closely involved as an important partner for the planning of urban growth on the Rangitahi Peninsula. Mr Peacocke and I met with Ms Greensill from Tainui Hapū in October 2020 to discuss Rangitahi's submission on the PWDP and to seek to understand Tainui Hapū's views on Raglan's future growth. I have had several further discussions with Ms Greensill since then.
46. I understand that Tainui Hapū would like to be closely involved in future comprehensive planning for Raglan's growth and the infrastructure required to support that growth. This is to ensure that cultural values are considered and reflected and to enable Tainui Hapū to promote its aspirations and secure appropriate provision for development of Maori land.

PROPOSED FUTURE URBAN ZONE FOR RANGITAHİ SOUTH

47. As I have explained, the sequencing of development of the Afon Oporu and Te Hutewai growth areas in Waikato 2070 is anticipated to occur from west to east, with the first location being Afon Oporu. This sequencing provides the opportunity to continue the development of the Rangitahi Peninsula to the south of the development precincts identified on the Rangitahi Structure Plan before extending growth further west into the balance of the Afon Oporu and Te Hutewai growth areas.
48. Analysis of this opportunity has been led by Ms de Lambert with input from Mr Lunday. Their work identifies the potential for additional development areas both within the southern part of the Rangitahi Peninsula Zone and in the

adjoining Rangitahi South area which is zoned Rural under the notified PWDP.

49. In planning terms, I consider there is relative simplicity to enabling additional development in the southern part of the Rangitahi Peninsula Zone and Rangitahi South in future. This is because:
- (a) Rangitahi and WDC have put significant effort into establishing the special purpose Rangitahi Peninsula Zone which could be extended further south in future. I consider this could be achieved through very limited modification to the existing provisions.
 - (b) The Rangitahi Structure Plan would need to be updated to also include Rangitahi South, but the foundations for the development approach are well established and the changes would build on the work which has already been undertaken.
 - (c) The Rangitahi Peninsula Zone provisions and the Rangitahi Structure Plan already adopt the sensitive and Raglan-specific approach to growth which has been established as being important to maintain and enhance Raglan's special character.
 - (d) The land is predominantly held in the ownership of Raglan Land Company Ltd¹⁰ and its largely 'self-contained' nature will reduce the need for co-ordination with other landowners in the detailed aspects of structure planning.
 - (e) There are significant infrastructure advantages because Rangitahi has already completed the substantial capital investment required to service growth in this area. This includes such things as construction of the new bridge to the Rangitahi Peninsula, and upgrades to Oporuru Road and local water and wastewater mains networks. Mr O'Callaghan has confirmed that additional development in the southern part of the Rangitahi Peninsula could be serviced through the extension of existing water and wastewater mains and roads.
 - (f) Mr Clark also considers that the existing road access to and through the Rangitahi Peninsula is suitable for access to Rangitahi South and would assist rather than preclude opportunities for future road links to the west and east. The potential future extension of the spine road and the

¹⁰ The only land in Rangitahi South within the proposed FUZ which is not owned by Raglan Land Company Ltd is Lot 2 DP 489017 which is owned by Graeme Dickey and Simon Dickey and is 1.4ha in area.

potential future links west and east are shown on the drawing in **annexure A** of my evidence.

50. WDC's s42A Report dated 26 January 2021 introduces a recommendation for a Future Urban Zone (**FUZ**) to be included in the PWDP. It sets out the circumstances in which a FUZ would be more appropriate than a 'live-zone', including when:
 - a) A structure plan has not yet been prepared;
 - b) Roading and three waters trunk infrastructure required to service growth is not yet provided, is not programmed to be delivered within the current LTP over the current decade or is not able to be developer funded; and
 - c) Urbanisation is required over a 10-20 year timeframe.
51. Based on these criteria, the FUZ is better suited to Rangitahi South than a 'live-zone'. The pre-requisites for a plan change to rezone Rangitahi South from a FUZ to a 'live-zone' through a future plan change would be structure planning (covering the southern area of the Rangitahi Peninsula Zone and the FUZ) and confirmation of suitable infrastructure to service growth.
52. A plan is enclosed in **annexure A** showing the area that is proposed to be rezoned from Rural to FUZ. The extent of the FUZ has been informed by analysis of the area led by Ms de Lambert and Mr Lunday and in consideration of property and topographical boundaries.
53. The total area covered by the FUZ is approximately 51 hectares. However, like the Rangitahi Peninsula, the proposed zone boundaries are larger than the anticipated development areas. This allows for refinement of the development areas to occur through further analysis and structure planning prior to 'live-zoning'.
54. The analysis, which has been completed to date, identifies approximately 30 hectares of land spanning the FUZ and the southern part of the Rangitahi Peninsula Zone as potentially being suitable for urbanisation. This is based on a precinct development approach which is similar to the current Rangitahi Structure Plan. The indicative yield is approximately 350-450 dwellings based on a density range of 12-15 dwellings per hectare.

55. I understand that the additional supply of approximately 350-450 dwellings within the Rangitahi Peninsula Zone and Rangitahi South would be sufficient to address the long-term demand for housing in Raglan to at least 2040¹¹.

PROPOSED CHANGES TO GROWTH OBJECTIVES, POLICIES AND METHODS

56. There is currently a gap in the PWDP in terms of the absence of any recognition of Waikato 2070 and its role as a long-term guiding plan for the District's future growth. This is because notification of the PWDP occurred prior to Waikato 2070. Waikato 2070 supersedes the Waikato District Development Strategy 2015 and the Waikato District Economic Development Strategy 2015 which are referred to in Sections 1.10.1.1 and 1.10.1.2 respectively. I consider that updates to these sections of the PWDP should be made.
57. Changes to the PWDP are also sought in Chapter 1 (Introduction) and Chapter 4 (Urban Environment) to encourage a comprehensive approach to the management of Raglan's growth and the protection of the town's special character.
58. The specific changes which are sought are as follows:
- i. Delete Section 1.10.1.1 (Waikato District Development Strategy 2015) and Section 1.10.1.2 (Waikato District Economic Development Strategy 2015) and replace them with a new Section 1.10.1.1 as follows:

"1.10.1.1 Waikato 2070 Growth and Economic Development Strategy

- (a) The Waikato 2070 Growth and Economic Development Strategy (Waikato 2070) provides a long-term plan to achieve the Council's vision of creating liveable communities. It takes an integrated approach to future growth in the Waikato District, combining economic and community development with future land use and infrastructure planning. Whilst enabling growth, Waikato 2070 aims to do this in a way that protects the environment, which is essential for the health and wellbeing of the people. The strategy is important for informing future planning, investment and decision-making by

the Council for the district. It provides the indicative extent and timing for future growth cells, subject to further investigation and feasibility.

- (b) Town Centre Plans will be completed within the short term to outline future development and investment in towns and Structure Plans for growth cells identified in Waikato 2070 will be developed. Structure Plans and Town Centre Plans will form the basis for amendments to the District Plan via Variations/Plan Changes to enable development of growth areas identified in Waikato 2070.”

- ii. Amend Policy 4.1.18 as follows:

“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 and the Residential zoned areas are ~~is~~ the only areas that provides for ~~the~~ short to medium term growth;
- (iv) ~~and medium to~~ Long term growth is to be provided for in the Future Urban Zone south of the Rangitahi Peninsula. ~~and is~~ This area is to be planned and developed in a manner that connects to the existing town and maintains and enhances the natural environment and Raglan’s special character; ~~and~~
- (v) There are connections between the town centre, the Papahua Reserve and Raglan Wharf; ~~and~~
- (b) Future growth and structure planning for growth areas is to be guided by an overarching spatial plan for Raglan. The spatial plan shall be prepared by 2023 with input from tangata whenua, the local community and other stakeholders to enable and manage long term growth of the town whilst protecting Raglan’s special character.”

- iii. Include the recommended objectives, policies and rules set out in Appendix 2 of the s42A Framework for the Future Urban Zone.

PROPOSED WAIKATO DISTRICT PLAN (LENS 1)

59. Rangitahi's requested relief is assessed in the s32AA Evaluation under **annexure B** in terms of the relevant provisions in the PWDP.
60. The strategic objectives and directions for the district are contained in Sections 1.5 and 1.12 of the PWDP. The growth-related matters refer to accommodating urban growth through a more compact urban form within existing urban communities that have capacity for expansion and by achieving greater densities. Key purposes of this approach are to enhance the quality, character and vitality of urban environments, to facilitate the efficient provision and utilisation of infrastructure and to avoid impacts on the rural environment, particularly high-quality soil. The proposed FUZ is consistent with this approach because it is a suitable area for the expansion of Raglan, being adjacent to the existing urban area where infrastructure exists and can readily be extended. It does not contain high-quality soil.
61. Urban growth is anticipated to occur within defined growth areas which are to be zoned in the PWDP. Their development is to be guided through structure planning and master planning before land is rezoned for urban development. Definition of the growth areas is to be determined by consistency with the Future Proof Strategy's settlement pattern, including the population and land allocation limits. Unplanned encroachment into rural land is to be avoided by containing development within the defined urban areas.
62. The Future Proof Strategy is identified as being important for the definition of growth areas but the strategic objectives and directions, and the PWDP as a whole, are silent on Waikato 2070. This is because Waikato 2070 was prepared following notification of the PWDP. In this context, I consider that provisions which deal with managing change within the strategic objectives and directions are highly relevant. Waikato 2070 is one of the ways that WDC has recently sought to manage change in response to high growth and part of its stated intention is to help to deliver on the Future Proof strategy.
63. The proposed FUZ is consistent with Waikato 2070 and with the guiding principles in Future Proof. Its development is proposed to be guided by a structure plan for the FUZ which would be prepared prior to 'live-zoning'. Rangitahi's EIC also seeks for a WDC-led spatial planning process to be

undertaken to establish a long-term plan for the growth of Raglan as a whole, whilst also ensuring Raglan's special character is maintained and enhanced. This reflects a comprehensive approach to growth.

64. Other built environment matters which are recognised as important for the district in the strategic objectives and directions are a wide variety of housing forms, quality design that enhances and reflects local character and the cultural and social needs of the community. These matters are reinforced through objectives and policies in Chapter 4 which addresses the Urban Environment, including specific objectives and policies for Raglan.
65. Chapter 5 addresses the Rural Environment. Objective 5.1.1 is addressed in some detail in the s42A Framework Report. The objective states:

“5.1.1 Objective – The rural environment

(a) Subdivision, use and development within the rural environment where:

(i) high class soils are protected for productive rural activities;

(ii) productive rural activities are supported, while maintaining or enhancing the rural environment;

(iii) urban subdivision, use and development in the rural environment is avoided.”

66. The strong directive to avoid urban subdivision, use, and development in the rural environment is an entirely expected and reasonable approach, in my opinion, for areas which are not zoned for urban purposes through the PWDP. This objective will be very important for maintaining the integrity of the PWDP and for protecting rural areas from unplanned urban growth once decisions on zoning have been made. However, I do not consider that this objective prevents decisions being made to rezone land from Rural to an urban zoning where this is demonstrated to be suitable through evidence and where rezoning has been considered on balance against the broad policy framework in the PWDP and in other relevant planning documents. Having undertaken an assessment based on this approach, I consider the proposed FUZ to be appropriate.

RELEVANT PLANNING DOCUMENTS (LENS 2)

67. A full assessment of the relevant planning documents is contained in the s32AA Evaluation under **annexure B**. This section of my evidence summarises key matters relevant to the changes Rangitahi is seeking.

National Policy Statement on Urban Development (NPS-UD)

68. The NPS-UD is relevant and Section 75(3)(a) requires the district plan to give effect to it.
69. The NPS-UD came into force on 20 August 2020, following the notification of the PWDP. The WRPS, Future Proof and Waikato 2070 have not yet been amended to address the NPS-UD. However, I understand that updates to Future Proof and the WRPS are planned once a Housing and Business Development Capacity Assessment (**HBA**) for the Future Proof area has been completed in the first half of 2021¹². Dr Fairgray's EIC has considered the NIDEA demand analysis which is being used to inform the HBA. As such there is likely to be a high degree of consistency between the demand analysis in Dr Fairgray's EIC and the HBA.
70. The NPS-UD must be considered by local authorities that have an urban environment within their district or region when making planning decisions which affect an urban environment. An urban environment under the NPS-UD is any area of land that is, or is intended to be, predominantly urban in character and is, or is intended to be, part of a housing and labour market of at least 10,000 people. Raglan meets this definition because Waikato 2070 identifies a possible future population of 12,500 people in Raglan in 2070.
71. An important requirement of the NPS-UD for RMA plans is the provision of sufficient development capacity to meet expected demand for housing and business land. Dr Fairgray's EIC addresses demand and development capacity within Raglan for the short-term (0-3 years), medium-term (3-10 years) and long-term (10-30 years) periods referred to in the NPS-UD. His analysis includes holiday homes and competitiveness margins of 20% for the short-term and medium-term and 15% for the long-term.

¹²

s42A Framework Report, paras 187 and 268.

72. The NPS-UD also seeks to achieve well-functioning urban environments. As a minimum, well-functioning urban environments must have or enable a variety of homes, have or enable a variety of sites that are suitable for different business sectors, have good accessibility between housing, jobs, community services, natural spaces, and open spaces, support the competitive operation of land and development markets, support reductions in greenhouse gas emissions and be resilient to likely current and future effects of climate change. I consider that the proposed FUZ can address all these matters and that a comprehensively planned approach will ensure that it would be part of a well-functioning urban environment within Raglan.
73. Rangitahi is an active developer and I understand that Rangitahi intends to continue to develop land to meet demand. Along with development of other zoned areas in Raglan, continued development of the Rangitahi Peninsula and future development of Rangitahi South would assist in achieving the competitive operation of land and development markets.
74. I consider that the proposed introduction of a FUZ into the PWDP is consistent with the NPS-UD because it addresses the long-term planning period. It enables decisions for the urban environment to be better integrated with infrastructure planning. It also allows for a responsive and strategic approach, including sufficient lead time to plan for future development with the benefit of confidence that rezoning to a live-zone is an anticipated outcome. It will ensure that iwi, hapū and other stakeholders can be involved in planning through effective consultation that is early and meaningful.

New Zealand Coastal Policy Statement (NZCPS)

75. Section 75(3)(b) requires the district plan to give effect to the New Zealand Coastal Policy Statement. It is relevant because Rangitahi South is within the coastal environment.
76. Under the NZCPS, the protection of the values of the coastal environment does not preclude use and development in appropriate places and forms, and within appropriate limits. Policy statements and plans must consider where, how and when to provide for urban development in the coastal environment and where areas of the coastal environment are inappropriate for development.

77. No fundamental issues have been identified for the proposed FUZ through the analysis which has been undertaken. There are some sensitivities related to the coastal environment, including areas of significant natural values, areas of coastal hazards around the harbour margins and the potential for cultural heritage sites, which means that some parts of the FUZ are likely to be inappropriate for development. However, the detailed response as part of 'live-zoning' the FUZ in future can ensure that development areas can be sited away from these locations and that their values are appropriately protected.

Waikato Regional Policy Statement (WRPS)

78. Section 75(3)(c) requires the district plan to give effect to the Regional Policy Statement. I consider that the provisions of the WRPS which are of greatest relevance to the matters in consideration are the provisions for the Built Environment.
79. Objective 3.12 directs development of the built environment to be undertaken in an integrated, sustainable, and planned manner to enable positive environmental, social, cultural and economic outcomes. It lists a range of matters which are important for development of the built environment, including positive indigenous biodiversity outcomes, preserving and protecting natural character and outstanding natural features and landscapes, integrated infrastructure and land use planning, minimising land use conflicts and promoting a viable and vibrant central business district in Hamilton with a supporting network of sub-regional and town centres.
80. Policy 6.1 relates to planned and co-ordinated subdivision, use, and development. Regard must be had to the development principles in Section 6A, cumulative effects must be recognised and addressed, planning must be based on sufficient information to allow assessment of the potential long-term effects of subdivision, use and development and regard must be had to the existing built environment. The Implementation Methods recognise growth strategies as tools to be used in areas of significant growth and that urban planning mechanisms such as structure plans and town plans should be produced before land is rezoned for urban development.
81. Policy 6.2 is relevant to Raglan because it addresses planning for development in the coastal environment. A sensitive approach is required to

address matters including indigenous biodiversity, natural processes and hazards, natural character, features and landscapes, coastal character, infrastructure, avoidance of ribbon development along coastal margins, water quality and public access.

82. There are some strongly directive aspects of Policy 6.2 with regard to outstanding natural character, outstanding natural features and landscapes, natural hazard risk and ribbon development. No areas of outstanding natural character or outstanding natural features and landscapes have been identified through the analysis of the proposed FUZ. Avoidance of natural hazard risk and ribbon development can be addressed through future structure planning.
83. Policy 6.3 addresses co-ordinating growth and infrastructure to optimise provision of infrastructure and to ensure new development does not occur until provision for appropriate infrastructure necessary to service the development is in place. Method 6.3.1 sets out that district plans shall include provisions that provide for a long-term strategic approach to the integration of land use and infrastructure. In my opinion, the FUZ is an effective tool to assist with this long-term strategic approach.
84. Policy 6.14 relates to adopting the Future Proof land use pattern. It sets out that new urban development within Raglan and other settlements shall occur within the Urban Limits on Map 6.2 'Future Proof Map (indicative only)'. New residential development is also to be managed and located in accordance with Table 6-1 which includes residential population allocations for Raglan and Whaingaroa. However, the policy is not strictly limiting. It sets out that where alternative residential land release patterns are promoted through district plan and structure plan processes, justification shall be provided to demonstrate consistency with the principles of the Future Proof land use pattern. Method 6.14.3 refers to the development principles in Section 6A as being a required consideration for alternative residential land release.
85. It appears that Rangitahi South, and the Rangitahi Peninsula, are not included within the indicative urban limits. However, I understand that mapping of the urban limits at a high level rather than a property level is deliberate and reflects their indicative nature. The explanation to Policy 6.14 is clear that district plan processes must determine the detail of urban limit lines. One of the important factors is residential population demand. The residential population

allocations for Raglan/Whaingaroa in Table 6-1¹³ are substantially less than recent assessments of demand by NIDEA and Dr Fairgray (which also take into account the NPS-UD), as well as the possible population for Raglan in Waikato 2070¹⁴.

86. I consider the proposed FUZ for Rangitahi South to be a suitable response to the recent confirmation of higher than previously expected population growth in Raglan. The proposed FUZ does not involve the release of land, because that is dependent on 'live-zoning', but it does require decisions to be made about the location of urban growth in Raglan. Locating this growth in accordance with the recent Waikato 2070 growth strategy is consistent with the WRPS' recognition of the important role of growth strategies for areas of significant population growth and the requirement for justification in terms of the Future Proof settlement pattern¹⁵.
87. I have assessed the proposed FUZ in terms of the development principles in Section 6A in the s32AA Evaluation. I consider that the proposed Rangitahi South rezoning to FUZ achieves a high degree of consistency with the development principles. Some of the development principles address detailed matters which will need to be considered at structure planning stage. This would be an important matter for a future plan change for 'live-zoning' to address.

Future Proof Sub-Regional Growth Strategy (Future Proof)

88. Section 74(2)(b)(i) requires the district plan to have regard to management plans and strategies prepared under other Acts. I consider Future Proof, which is prepared under the Local Government Act 2002 (LGA), to be a relevant strategy for consideration.
89. Future Proof was originally completed in 2009. A Phase 1 update was completed in November 2017 which focused on growth management principles but no further updates to the Strategy have occurred and it has

¹³ 4,340 in 2021, 5,025 in 2041 and 5,200 in 2061.

¹⁴ The Raglan Development Plan in Waikato 2070 identifies a possible population of 12,500 in 2070.

¹⁵ Refer to para 62 (Inger, EIC) which explains that a stated intention in Waikato 2070 is to help to deliver on the Future Proof Strategy.

failed to keep up with changes in national policy. I understand that a Phase 2 update is expected to be completed in 2021 to address the NPS-UD.

90. As I have explained, the Future Proof settlement pattern is referred to in both the PWDP and the WRPS. The focus of the settlement pattern in Future Proof is to achieve more compact and concentrated urban form over time within key growth areas, including Raglan and other main settlements within the sub-region. The settlement pattern includes the Strategy's guiding principles (Section 1.3), indicative urban limits and growth projections and land allocations.
91. Future Proof identifies Raglan as a location for growth emphasis, with key features of the town recognised as being its desirable coastal character, its role as a destination town, a high number of holiday houses, expected residential growth due to coastal lifestyle, proximity to Hamilton and technological and transport improvements and the need for better public transport and walking and cycling opportunities
92. Like the WRPS, the Future Proof strategy also contains indicative urban limits for Raglan and other Waikato towns which I understand to be the same as the WRPS limits¹⁶. Growth within these areas is to be recognised and provided for. Their indicative nature is emphasised and the Strategy anticipates that changes may occur through further development analysis.
93. Section 7.1 relates to residential growth projections which the Strategy notes will be revisited as part of the Phase 2 update. That is important because the current projections do not reflect the most recent projections by NIDEA, nor do they address the requirements of the NPS-UD. Like the residential population allocations in the WRPS, the allocation and staging of residential and household growth in Future Proof is substantially lower than the recent assessments by NIDEA and Dr Fairgray¹⁷.
94. Future Proof recognises that the numbers it uses are forecasts only and will need to be carefully monitored and adjusted if necessary. This is consistent with the responsive approach to development which is addressed in Section

¹⁶ As described in Para 85 (Inger, EIC).

¹⁷ Section 7.2 identifies demand for 386 households in 2016-2025, 122 households in 2026-2035 and -82 in 2036-2045. The total allocation for the 30-year period 2016-2035 is therefore 508 households.

7.5 and which recognises the need for the Future Proof settlement pattern to be agile enough to respond to change. In my opinion, the circumstances for decision-making on the PWDP demand an agile and responsive approach to urban limits and growth projections and land allocations.

95. Drawing on the findings of the evidence presented by Rangitahi, I have considered the proposed changes to the PWDP in terms of the guiding principles in Future Proof. I consider that the proposed FUZ is consistent with the settlement pattern because:

- The opportunity to amend the Rangitahi Structure Plan in future and to extend its reach into the proposed FUZ in Rangitahi South will assist in promoting increased densities in new residential development and more intensive redevelopment of existing urban areas, whilst also enabling development to locate adjacent to an existing urban area.
- The proposed FUZ provides the opportunity to retain and enhance Raglan as a *“seaside settlement that maintains the established desirable character of the Raglan coastal environment”* whilst also recognising that the town is a location for growth emphasis.
- The proposed FUZ enables Rangitahi to continue with an environmentally sensitive approach to development of the Rangitahi Peninsula, including appropriate protection of the natural environment and landscape through future structure planning.
- Maintenance and enhancement of cultural and heritage values can be addressed through ongoing engagement with tangata whenua, including through future structure planning. This recognises their role as kaitiaki.
- The proposed FUZ will support and enable efficient use of existing infrastructure, including planning for the provision of infrastructure to service growth. The availability of suitable infrastructure will need to be confirmed as part of ‘live-zoning’.
- The proposed FUZ does not contain high-quality soil. Opportunities for ongoing productive use of rural balance areas which are unsuitable for urban development can be considered at structure planning stage by taking a similar approach to the existing Rangitahi Structure Plan which makes use of balance areas which are unsuitable for residential development for rural purposes.

Waikato 2070 Growth and Economic Development Strategy (Waikato 2070)

96. Waikato 2070 is also a relevant strategy prepared under the LGA which regard should be had to in accordance with Section 74(2)(b)(i).
97. The strategy was adopted by WDC in May 2020 so it represents the most recent long-term plan for management of growth in Waikato District. I consider that considerable weight should be afforded to Waikato 2070 in decision making on the PWDP because it is recent, the strategy is stated as being prepared in accordance with the WRPS and it was prepared in accordance with the LGA following community consultation, submissions and hearings. I understand that it represents WDC's latest thinking with respect to urban growth and giving effect to the Future Proof settlement pattern.
98. Section 4 of Waikato 2070 explains that the strategy "*details spatially where and when development (residential and employment) can occur in the district*". It does this through development plans for the main towns within the District, including Raglan. It explains that "*it is important to note that growth areas are subject to further investigations, which will analyse the funding servicing and infrastructure provision required to support the growth areas identified*".
99. I have provided an overview of the growth planning for Raglan in Waikato 2070 in paragraphs 32 to 37 of my evidence, including that the proposed FUZ at Rangitahi South is located within part of the Afon Oporuru growth cell which has a 10 to 30 year development timeframe. The proposed FUZ is consistent with this timeframe because it will provide for urbanisation within the next 20 years.
100. Section 5.2 of Waikato 2070 explains that structure plans for growth cells within Waikato 2070 will be developed, that the development of a structure plan must be informed by consultation, particularly with tangata whenua, and that the development of a structure plan is required prior to rezoning of a site in a district plan. I agree that the development of a structure plan for the proposed FUZ is an important pre-requisite for live-zoning and I consider that consultation with tangata whenua and the wider community as part of the preparation of the structure plan is very important. I do not consider a structure plan to be a necessary requirement prior to rezoning an area to FUZ.

BEST PRACTICE PLANNING GUIDANCE (LENS 3)

101. The s42A Framework Report sets out best practice planning guidance for assessment of proposals based on guidance issued by the Auckland Unitary Plan Hearings Panel. An assessment of the proposed rezoning of Rangitahi South to FUZ follows using the same headings.

Economic costs and benefits are considered

102. The s32AA evaluation (**annexure B**) contains an assessment of the economic costs and benefits of the proposed FUZ.

Changes should take into account the issues debated in recent plan changes

103. The most relevant plan change to the proposed FUZ is Plan Change 12 which resulted in the rezoning of the Rangitahi Peninsula for urban development. I was not involved in Plan Change 12 but I understand key issues which were considered included the need for a sensitive approach to development and the most appropriate location of access to the peninsula.

104. I have referred to the importance of a sensitive approach to future development of the FUZ throughout my evidence. I consider that an important advantage of the FUZ for Rangitahi South is the potential to extend the existing Rangitahi Peninsula Zone and Rangitahi Structure Plan over that area. This would be efficient and effective because the Structure Plan and the objectives, policies and rules are well established and already included in the PWDP.

105. Mr Clark has addressed access to the FUZ in his transport evidence. He has considered the potential for up to 1,100 dwellings¹⁸ to be serviced from the existing access to the peninsula via Opotoru Road. He considers that Opotoru Road is likely to have adequate capacity¹⁹. He has also identified the potential benefits of wider connections from the Rangitahi Peninsula in future to the east and west, including the potential for a road to link the peninsula to Te Hutewai Road and future growth areas beyond.

¹⁸ 1,100 dwellings is the potential upper limit total based on 650 dwellings within and around the development precincts in the current Rangitahi Structure Plan (subject to resource consents) as well as up to 450 dwellings within the southern part of the Rangitahi Peninsula Zone and the FUZ.

¹⁹ Clark EIC, para 70.

Changes to zone boundaries are consistent with the maps in the plan that show overlays or constraints (e.g., hazards)

106. Overlays from the PWDP have been considered and mapped as part of the analysis of the FUZ. The potential development areas identified on the plan in **annexure A** have been sited to avoid these areas. More precise locations of the potential development areas should be considered and confirmed as part of future structure planning.

Changes should take into account features of the site (e.g., where it is, what the land is like, what it is used for and what is already built there)

107. The proposed FUZ is used for pastoral farming. The analysis of the FUZ which is included with Ms de Lambert's EIC includes plans which identify the rolling nature of the landform, which is steep in places. The analysis supports a precinct-based approach to development similar to the Rangitahi Structure Plan. The detailed response will need to be developed through structure planning for the FUZ and the southern extent of the Rangitahi Peninsula Zone prior to live-zoning.

Zone boundary changes recognise the availability or lack of major infrastructure (e.g., water, wastewater, stormwater, roads)

108. Although there are some infrastructure challenges in Raglan, they are not insurmountable and investigations are underway by WDC and Watercare to address them.
109. Some of the key infrastructure challenges for development on the Rangitahi Peninsula have already been addressed by Rangitahi as part of work completed to enable development on the peninsula to commence, including a new bridge, upgrades to Oporu Road, the construction of the initial section of the 'spine road' through the peninsula and installation of new water and wastewater mains. The proposed FUZ would enable more efficient use of this infrastructure.

There is adequate separation between incompatible land uses (e.g., houses should not be next to heavy industry)

110. The proposed FUZ is predominantly surrounded by rural-residential and rural grazing land uses. A designated water treatment site is located to the north-west but that does not raise any incompatibility issues.

Zone boundaries need to be clearly defensible, e.g., follow roads where possible or other boundaries consistent with the purpose of the zone

111. The proposed FUZ boundaries have been determined as part of the analysis led by Ms de Lambert and Mr Lunday and in consideration of property and topographical boundaries. The extent of the proposed FUZ is larger than the anticipated development areas. This allows for refinement of the development areas to occur through further analysis and structure planning prior to 'live-zoning'.

Zone boundaries should follow property boundaries.

112. The proposed FUZ boundaries follow property boundaries except for the south-eastern boundary of the FUZ. That is because the property boundary in that location is a significant distance away from the anticipated development areas and following the property boundary in that location would result in the FUZ covering a very large area.

Generally, no 'spot zoning' (i.e. a single site zoned on its own)

113. The proposed FUZ directly adjoins the Rangitahi Peninsula Zone and provides the opportunity to extend the existing Rangitahi development. The proposed FUZ does not constitute "spot zoning".

Zoning is not determined by existing resource consents and existing use rights, but these will be taken into account

114. There are existing resource consents for the Rangitahi development within the Rangitahi Peninsula Zone but there are no existing resource consents for development within the proposed FUZ.

Roads are not zoned

115. There are no public roads within the proposed FUZ.

CONCLUSION

116. In summary, I conclude that:

- (a) The proposed FUZ in Rangitahi South is required to meet long-term housing demand in Raglan.
- (b) The pre-requisites for a plan change to rezone Rangitahi South from a FUZ to a 'live-zone' through a future plan change would be structure planning (covering the southern area of the Rangitahi Peninsula Zone and the FUZ) and confirmation of suitable infrastructure to service growth.
- (c) Structure planning for growth areas in Raglan should be guided by a Council-led spatial plan to establish a long-term plan for the growth of Raglan as a whole, whilst also ensuring Raglan's special character is maintained and enhanced.
- (d) The proposed FUZ has been considered in terms of the objectives and policies in the PWDP (Lens 1), relevant policy documents (Lens 2) and best practice planning guidance (Lens 3) in accordance with the recommended approach in the s42A Framework Report. Overall, I consider that the FUZ is consistent with the PWDP and with the relevant policy documents. It is also consistent with best practice planning.
- (e) The changes that I recommend to the PWDP are set out in paragraph 59 of my evidence.

Dated this 17th day of February 2021



Ben Inger

Annexure A: Rangitahi South Proposed Future Urban Zone Plan

Annexure B: s32AA Evaluation

Annexure C: Raglan Development Plan (Waikato 2070)

Annexure D: Future Growth Area Plan