

**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
JAMES DICKSON LUNDAY FOR RANGITAHİ LIMITED**

(URBAN DESIGN)

Dated: 17 February 2021

Solicitors on Record

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INTRODUCTION, QUALIFICATIONS AND EXPERIENCE

1. My name is James Lunday.
2. I am an Urban Designer and Director of James Lunday Urban Design Ltd. I hold the qualifications of Diploma of Architecture, Bachelor of Arts with First Class Honours, Bachelor of Planning with First Class Honours, a Diploma of Urban Design, and a Masters of Urban Design (Distinction) both from Oxford Brookes.
3. I have 40 years' experience in Architecture, Landscape Planning, Strategic Planning, Heritage Planning, Urban Regeneration, and Urban Design having worked in Government, Academia, N.G.O, and Private Sectors. My experience and expertise are further detailed in **Annexure A** to my evidence.

CODE OF CONDUCT

4. I have read the Environment Court Code of Conduct for expert witnesses and agree to comply with it.
5. 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

6. 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 a more spatial planning and character driven growth approach to future urban growth in Raglan West.
7. I am familiar with the Raglan West area and surrounding environment having been involved in a the Rangitahi Peninsula work from its conception through to providing evidence in support of the private plan change that established the Rangitahi Peninsula Zone and Structure Plan. As part of the plan change, I undertook a character study of Raglan. I have

visited Raglan on innumerable occasions visiting the towns and its beaches whilst resident in the North Island.

8. In preparing evidence for both the Rangitahi Peninsula plan change and this plan review hearing, I have worked alongside Landscape Architect Rachel de Lambert and support her landscape analysis of the wider Raglan landscape as well as that of the established settlement.
9. In my evidence, I will concentrate on what I consider the essential character and form of Raglan as a unique New Zealand coastal urban environment set in a complex natural environment. My evidence addresses the need to apply a structure planned approach for the growth expected in the Town, to ensure that planning for future growth recognises the special character and form of Raglan. I reference the Rangitahi Peninsula process of defining the capacity of land to absorb development, and to create a structure plan that is sympathetic to the special character and qualities of Raglan. In preparing this evidence I have relied on the work that I and other members of Common Ground Studio produced in the past in relation to Raglan as well as other studies.
10. In preparing this statement of evidence-in-chief (**EIC** or **evidence**) I have read the following documents:
 - (a) Rangitahi's submission and further submission on the Proposed Waikato District Plan (**pWDP**);
 - (b) The other EIC on behalf of Rangitahi, paying particular attention to the landscape evidence prepared by Ms de Lambert;
 - (c) The s.42A Framework Report;
 - (d) The Raglan Character Study prepared for the Waikato District Council by Isthmus, landscape architects (22 April 2020); and
 - (e) Raglan Naturally: Community Plan 2020.

SPECIAL CHARACTER AND FORM OF RAGLAN

11. The character of a place is defined, to a large extent by:

- (a) Historical connections, routes, and nodes.
 - (b) Evolution of the town and neighbourhoods.
 - (c) Natural topography and watercourses.
 - (d) Building responses and lot patterns.
 - (e) Landscape features, views, cultural significance.
 - (f) Urban patterning.
 - (g) Sense of Place.
 - (h) Amenity.
12. Raglan has a very special receiving environment that, in a very strong and positive way, has fundamentally shaped its urban form. Ms de Lambert's evidence refers to the Town's special landscape qualities. In this section of my evidence, I draw on information which is contained in the graphic presentation which is included under **Annexure B Character** and **Annexure C Historic Growth** of my evidence. These help explain the special qualities of the urban environment which contribute to Raglan's special character. This is an updated analysis of work which I initially presented in 2010.
13. The Powerpoint (**Annexure B Character**) defines what I consider to be the important elements that make up the existing character and future character as defined by the exemplar Rangitahi Structure Plan process. I discuss these elements below.

Historical Context

14. Early settlement in Raglan, both Maori and European, was built around coastal trade and a safe Harbour. The first town plan was developed in 1860, not long after sale of land by Ngati Mahanga to the Crown. This was defined by a geometric road and block pattern that was contained within a north-western sloping basin. The Harbour was the primary open space with access to and along the waterfront one of the key structuring elements of this first plan. A strong, dominant axis is formed along Bow

and Wallis Streets to the Town Wharf. These historical patterns remain the backbone of Raglan's character even today. (**Annexure C Historic Growth**)

15. After the development booms of the 1920's and WWII periods, Raglan's township boundary continued to be defined by the water's edge. The driving elements of Raglan's character remained strong, including:
 - (a) An expanded Township Boundary but neighbourhoods remained focused on water frontage.
 - (b) Lot pattern and intensity defined by topography and proximity to commercial node (either at waterfront or top of ridge).
 - (c) Limited suburban scale lots.
 - (d) Focus on large-lot "peri-urban" lots, particularly on steep terrain or poor aspect.
 - (e) The circulation pattern relied on roads located on ridges or followed the contour lines.
 - (f) Bridge and causeways across estuaries connected neighbourhoods.
 - (g) Open Space provision limited to waterfront amenity and Riparian Margin.
 - (h) Community Amenity continued to be focused on the existing town centre.

16. While water focus for commercial activity waned with the improved formation of the Hamilton - Raglan Road (SH 23), it also facilitated its discovery as a holiday destination by the Waikato and wider population. When surfing became mainstream in the 1960's—70's, Raglan became an independent tourist destination, achieving international recognition. This resulted in the first significant development "boom" for the town but given the robust town plan this was accommodated without undermining the intrinsic character.

17. New communities and neighbourhoods continued to develop along the coast and around the Harbour. These continued the Raglan tradition of connection to the water's edge, separated by topography, and the distinct town character and identity remained.
18. SH23 was upgraded again in the late 1980's and early 90's to its present form, cutting travelling time to and from Raglan by car. This coincided with the economic boom occurring at the time, and the demand for coastal property, resulting in huge growth demand pressures for the community. Without a comprehensive strategy for development and a lack of appropriate housing options, the town was unable to accommodate the growth within the established urban boundary. Owners and investors began to focus on lifestyle block and suburban developments as the only options open to them. As a response, new areas were identified for future "suburban" development at Raglan's edge.
19. The provision of new housing areas was therefore "demand led" rather than plan led and the resulting urban form was counter to the historic patterns of development that Raglan had built its identity and economy around. Furthermore, they embody none of the characteristics that make Raglan special. Whilst this is also true of many Towns in New Zealand and the Waikato, Raglan has a special character that makes it nationally if not internationally significant.
20. Lack of growth in previous decades has, until now, largely preserved the character of Raglan but current planned growth and increased predicted growth (as addressed in Dr Fairgray's EIC) will see Raglan come under pressure. It is therefore essential to not only allow for that growth but to allow for it in a way that adds to the qualities of Raglan and builds on its special nature.
21. Void of a strong spatial plan and design guidelines, some of the recent development in Raglan has resulted in:
 - (a) A form and pattern of new development that reinforces commuting to Hamilton.
 - (b) Character of Raglan limited to the definition of its Mainstreet.

- (c) Communities built along roads, not around water.
- (d) Subdivision creating “anywhere” suburbia.
- (e) Inappropriate densification of slopes.
- (f) Loss of the pre-existing sense of arrival into Raglan.
- (g) A departure from this ad hoc development is the structure planned growth on the Rangitahi Peninsula which gives an example of how to grow the town and preserve its very essence.

Present Day Raglan

- 22. Despite some of the more recent development detracting from Raglan’s special character, the overall urban structure proposed in earlier historical plans for Raglan has generally been preserved, particularly through the circulation pattern.
- 23. The Town is girthed by sea, or to be more accurate by Harbour and Estuary. The urban form has developed as a series of peninsulas connected by causeways. The Harbour and estuaries were the main thoroughfares and today remain as recreation thoroughfares. This urban pattern of development combined with the low impact “bach” architectural style, strong Mainstreet and respect for topography in subdivision, has produced a distinct built character.

Rangitahi Peninsula

- 24. One of the peninsulas which will increasingly contribute to Raglan’s urban character in future is the Rangitahi Peninsula. The Rangitahi Peninsula is Raglan’s next significant growth area. Its development, which is now underway, follows a comprehensive structure planning exercise which resulted in the land being rezoned through Plan Change 12 to the Waikato District Plan. Some five years or so after its inclusion in the District Plan, the first houses within the Rangitahi Structure Plan area are now under construction.
- 25. The development of the Rangitahi Peninsula has demonstrated a different approach to other more recent development, both in terms of the plan led

process which has been followed and in terms of the planned development approach. The Rangitahi Structure Plan is based on an approach of responding to the landscape and developing masterplan, structure plan and design guides that continue the essence of Raglan.

26. The overall urban structure proposed in earlier historical plans for Raglan has generally been preserved in the Rangitahi Structure Plan, particularly through the circulation pattern. However, where it differs is that through the master planned approach the gullies, riparian edges and steeper slopes have been preserved as open/landscaped space. The built areas are located in Precincts suitable for a denser form of development yet still preserving the tree and green coverage that is a characteristic of Raglan existing historic development.
27. Driving the design approach was sustainability initiatives, and the necessity to both embrace and expand the Raglan character. This required a compact settlement form that responds to the natural and physical environment, reduces vehicle dependency, and provides for a variety of living opportunities for people of all ages.
28. Key elements of the vision which the Rangitahi Structure Plan is based on were:
 - (a) Compact, walkable and well-designed settlement defined by landscape and access the water's edge.
 - (b) Creation of a real, localised and authentic sense of place.
 - (c) A place that is attractive to the full range of family types, visitors and business.
 - (d) Development that responds to landscape and resources within it, local vernacular and cultural associations.
 - (e) Creation of a carefully planned and executed pedestrian and cycle network.
 - (f) An attractive environment, green streets, parks, open spaces, quality public realm, quality design and architecture.

- (g) Respect for the environment with low impact design, green technology, green architecture and green streets and infrastructure.
 - (h) A settlement for everyone, adopting universal design strategies, local facilities and diversity of housing.
 - (i) Connectivity through a new bridge to existing neighbourhoods, amenities and the town centre
 - (j) Protection of the valleys, gullies, coastal margins and steep slopes with the aim to restore native vegetation or forest.
 - (k) Balance of land to be developed where suitable for productive agriculture for local food production and reinforcement of the cultural landscape.
 - (l) More sustainable and intensive, mixed, agricultural practices to be promoted.
 - (m) Infrastructure that supports small business, work from home and best practice telecommunication provision.
 - (n) A single land management system.
 - (o) Development areas that can absorb a variety of densities and house types.
29. I consider that the comprehensive structure planned approach will result in the development of the Rangitahi Peninsula being a positive contribution to Raglan's future character. The Rangitahi Peninsula outcomes so far demonstrate that the development is achieving a high-quality outcome which is closely aligned to the values and characteristics of Raglan.

RAGLAN'S FUTURE GROWTH

30. Raglan has a more prominent status and more facilities than many larger towns due to its tourist role. It has long been a holiday destination with a more minor role as a rural service town. It is also a world-famous surfing

destination immortalised in film and documentaries. Increasingly, its role is changing being recognised as a quintessential New Zealand beachside community, attracting wider tourism and permanent residents attracted by the special character and lifestyle it offers. Its unique elements attract a wide regional, national, and international visitor base, swelling its population by 300-400% at peak times.

31. Raglan's special qualities and unique lifestyle opportunities are likely to lead to strong demand for housing within the town in future. Dr Fairgray's evidence addresses the Waikato 2070 Growth and Economic Development Strategy (**Waikato 2070**) which identifies the potential for significant growth in Raglan. It refers to a potential increase in population from approximately 4,000 at present to 12,500 within the next 50 years.
32. The Raglan Development Plan, which sits within Waikato 2070, identifies new future growth areas in Rangitahi South and Raglan West in addition to existing zoned areas in Lorenzen Bay and Flax Cove in Raglan East and Rangitahi and Rakaunui in Raglan West. Potential transport connections are shown in the Raglan Development Plan. They include potential future roads linking Rangitahi to SH23 and linking Rangitahi to Wainui Road through Raglan West.
33. The growth areas identified in Waikato 2070 align with the Rangitahi submission seeking a structure planned approach to future growth in South and West Raglan (see figures below).

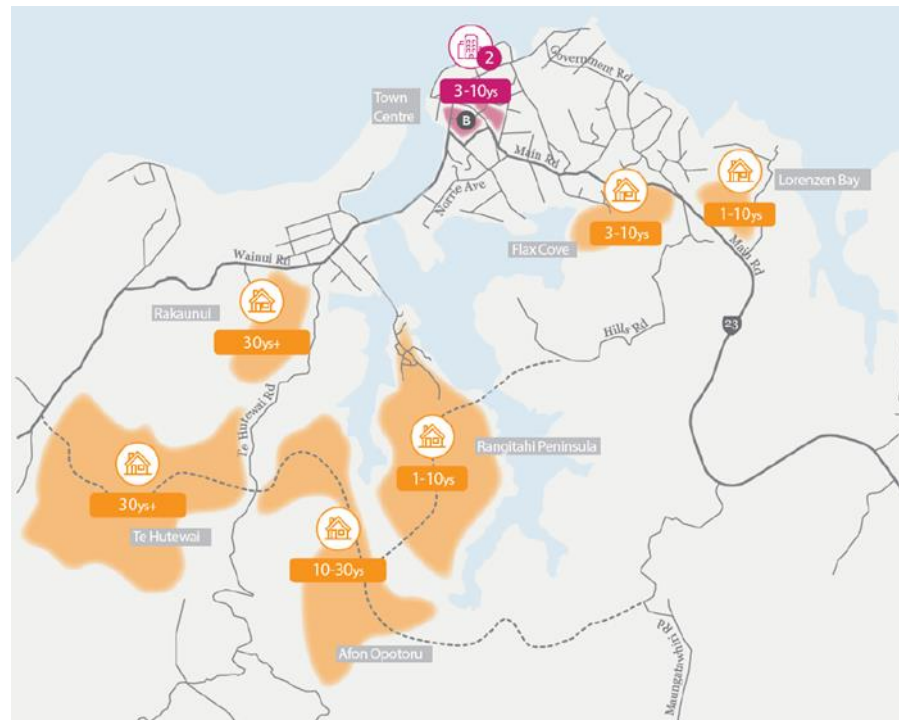


Figure 1: Waikato 2070 areas identified for Future Growth Areas

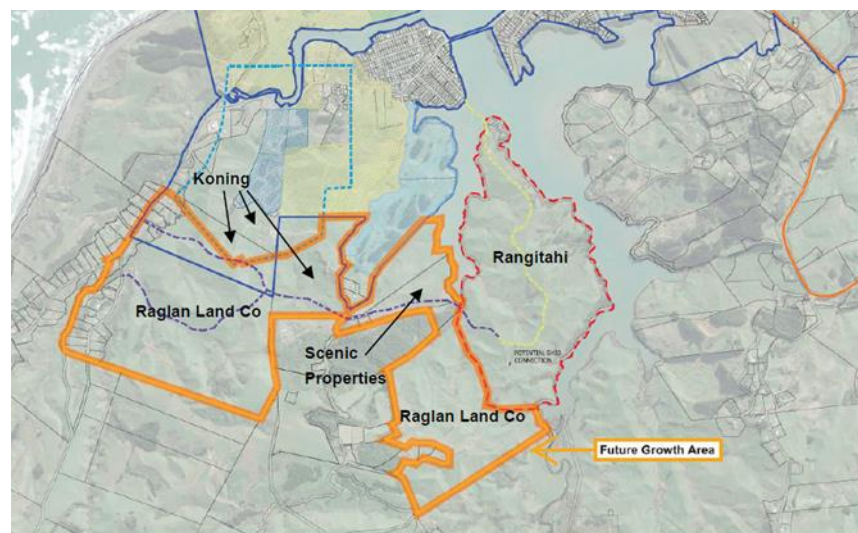


Figure 2: Areas identified for future growth in Rangitahi submission

34. I agree that Rangitahi South and Raglan West are suitable locations for growth based on the existing urban form and taking into account the proximity of those areas to the beaches west of the town. However, further analysis of these areas is required to plan for their future development. The development of these areas will require a sensitive approach to reflect the landscape, environmental, cultural, and settlement

qualities of Raglan, in the same way that a sensitive approach was taken for the Rangitahi Peninsula.

35. It is also important that future development is guided by a clear long-term plan for Raglan as a whole to ensure that growth is accommodated in a way that is unique to Raglan and enhances rather than erodes Raglan's special character.

A PLANNED APPROACH FOR RAGLAN

36. The lack of a strong spatial planning approach to Raglan, and a reliance on generic planning rules designed for more conventional suburban development, places the unique character of Raglan in danger from infill housing and suburban sprawl. Like the Rangitahi Peninsula, growth should be planned for in a way that does not negatively impact on the character and qualities of Raglan.

High-Level Spatial Plan for Raglan

37. I agree with the following statement from Ms de Lambert's evidence :

An appropriate form of future growth for Raglan, growth that supports rather than detracts from the particular character of the settlement, needs to take a comprehensive planned approach and avoid ad-hoc or incremental growth that 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. Check Rachel has not edited

38. I consider that the above statement applies to growth which is both outside of and within the existing urban area of Raglan.
39. One challenge of the Rangitahi Structure Plan was that, as a private plan change, there was a lack of ability to address wider issues affecting

Raglan's character and growth. That is because an earlier Raglan Structure Plan, which had been proposed by Waikato District Council, was subsequently withdrawn. In my opinion, Raglan deserves and requires a spatial plan for the Town as a whole. The strong landscape, historical characteristics, and the national significance of the town warrant this.

40. I recommend that a Council-led high-level spatial plan should be prepared to establish the overarching approach to the growth of the town. This should build on the work undertaken as part of Waikato 2070, the Raglan Character Study, the Raglan Naturally Community Plan, the Raglan Landscape Framework (attached to Ms de Lambert's evidence), and infrastructure planning. The process should involve the local community and key stakeholders in identifying values that the community and stakeholders consider are important to plan for and potentially protect.
41. There are a wide range of factors which require broad consideration in relation to accommodating growth in Raglan which a spatial plan process would enable consideration of. They include:
 - (a) The degree and way in which infill might be accommodated within existing urban areas is an important matter to consider. This will inform an assessment of the capacity of existing urban area as well as the demand for additional land outside of the existing urban area to accommodate growth. The degree to which Raglan's existing urban areas can and should accommodate infill development warrants a detailed assessment.
 - (b) The residential growth which is identified in Waikato 2070 necessitates careful thought regarding how and where new commercial and industrial development should be accommodated in future to service a growing population. Raglan's existing character is strongly defined by its Mainstreet and protecting this character element is very important.
 - (c) Suitable transportation and three waters infrastructure are critical factors in growth related decisions and have a significant bearing on urban form. Transportation planning needs to be long-term

and also must respond to the need for high levels of multi-modal connectivity.

- (d) The need for additional community facilities such as schools, medical centres and halls is important. These facilities are the beating heart of a community's sense of place and their provision must be planned for with the involvement of relevant stakeholders.
 - (e) Planning for a well-connected network of open space based on the key natural features and attributes of the town is key for Raglan. This requires careful consideration of providing strong connections to the waters edge, including harbour, estuary and beaches.
 - (f) Ensuring that there is sufficient land released to have some effect on price escalation caused by housing shortage.
 - (g) Encouraging diversity of house types to reflect changing attitudes, needs and wants.
42. The spatial plan should confirm and guide a series of key actions. This may include, for instance, preparation of some Raglan-specific provisions for inclusion in the District Plan through a plan change. One of the actions should be structure planning for growth areas which should be undertaken to provide a growth area specific response to the high-level spatial plan prior to the rezoning of those areas. The high-level spatial plan would establish the key outcomes for the structure plans to achieve. While the spatial plan should be Council-led, the structure planning may be led by landowners.

Structure Planning for Raglan's Growth Areas

43. Zoning and rules are effective in determining broad growth capacity parameters, but it is a structure plan process that ensures that desirable environmental, social, and economic outcomes are achieved. The structure plan process enables a local response to national, regional, and district strategies and policies, and is a means to achieve a higher level of security of outcome than can be achieved through District Plan objectives,

policies and rules alone. It also aligns with the move towards spatial planning signalled by the Government.

44. Structure planning is the approach that we used to help shape the Rangitahi Peninsula. Our sieve mapping analysis helped define the capacity of the land to absorb development, where and why. It also helped shaped infrastructural requirements and responses. The plans and supporting information which were included in the District Plan as an outcome of the Structure Plan process provide clear guidance on the expected development outcomes and how they are to be achieved.
45. A structure plan cannot convey or enforce qualitative directives. As with a building, it is the detailed application of a finer grain of guidance that will ultimately give effect to the higher-level planning documents. For this reason, I also recommend that structure plans be supported by a masterplan and supporting design guides. I consider that input from the local community and stakeholders is important in any structure planning process. This is especially so in Raglan which has such special character. Same words used in Rachel's evidence

PROPOSED FUTURE URBAN ZONE

46. 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.
47. Rangitahi is seeking a FUZ over the Rangitahi South growth area which is immediately to the south of the Rangitahi Structure Plan area. In my view, the southern area of the Rangitahi Peninsula, including the southern part of the Rangitahi Peninsula Zone and the proposed FUZ, could contribute further available land for quality, place based urban growth in Raglan.
48. When I was involved in the earlier structure planning work, we had anticipated further development. However, at the time it was perceived

that there was insufficient demand for an extension of the Structure Plan further south. Our mapping exercises nonetheless confirmed this area as suitable for urban extension. Ms de Lambert's mapping work for this hearing provides further confirmation of the suitability of this area (Figure 3, proposed FUZ and potential pockets of urban development within the FUZ in Rangitahi south, Ms de Lambert's EIC, at para. 45).

49. It is important that a future structure planning process is followed for the southern part of the Rangitahi Peninsula before it is zoned for development. This may involve an extension of the existing Rangitahi Structure Plan. It would be informed by a Raglan-wide spatial plan if the recommendations that I have made in that regard are accepted.

CONCLUSION

50. In summary, I conclude that:
 - (a) Raglan requires a planned approach to growth to ensure that growth occurs in a way that does not negatively impact on the special character and qualities of Raglan. Without a strong spatial planning approach – and a reliance instead on generic planning rules designed for more conventional suburban development – there is the danger that ad-hoc infill and suburban sprawl will reduce the impact of the unique character that is Raglan.
 - (b) A spatial plan should be prepared for the wider Raglan area to protect the character of the Town and its environment, whilst setting out a clear long-term vision for its growth.
 - (c) Dr Fairgray's analysis confirms there is sufficient land available to accommodate growth in the next 10 years. There is time to produce a spatial plan for Raglan as well as structure plans for the different growth areas.
 - (d) Raglan is not like any other small town in the Waikato, nor should it morph into a suburb of Hamilton. It has national and international significance and deserves the highest level of

spatial planning and protection of its built, cultural and environmental qualities.

- (e) Growth can be accommodated in Raglan in a way that maintains the special qualities of the town and indeed enhances and reinforces those distinctive local characteristics for future generations but only through a well-planned approach. It is flawed to adopt a blanket approach to urban future development across the district.
- (f) I concur with the following closing statement in Ms de Lambert's evidence:

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.

Dated this 17th day of February 2021

A photograph of a handwritten signature in black ink on a light-colored surface. The signature is cursive and appears to read 'James Lunday'.

James Lunday

ANNEXURE A

SUMMARY OF EXPERTISE AND EXPERIENCE

1. I am currently the Director of an Urban Design and Planning Consultancy. Previously, I have held the positions of:
 - (a) Urban Designer/Landscape Planner for the State Government of Victoria (Australia),
 - (b) Director of Urban Regeneration for the Civic Trust (UK),
 - (c) Executive Director of the Auckland Heritage Trust (NZ),
 - (d) General Manager of Strategy and Urban Design for Regenerate Christchurch,
 - (e) Manager of Urban Design and Heritage for City of Geelong.
2. I have been a practicing Urban Designer since 1982, when I was appointed to the position of Urban Designer and Landscape Planner for the Ministry for Planning and Environment, Victoria, Australia.
3. In 1985 I was appointed to the position of Director of Economic Regeneration for the Civic Trust, London, in charge of South West Urban Renewal Projects. Whilst in this position the Civic Trust became a founder of the Urban Villages Forum, established to develop new settlements to absorb growth in the United Kingdom.
4. In 1989 I was appointed to the position of Executive Director of the Auckland Heritage Trust. I have an academic and working history of creating masterplans and urban renewal strategies for historic areas and conservation plans for historic buildings. I have had a long involvement and specialisation in waterfront environments, coastal, lake and river.
5. In 1993 I was seconded, during a study tour, to the offices of Andres Duany and Elizabeth Palter-Zyberk, who had at the time developed the Traditional Neighbourhood Design theory in the pioneering developments of Seaside, Boca Raton, Windsor and Kentlands.

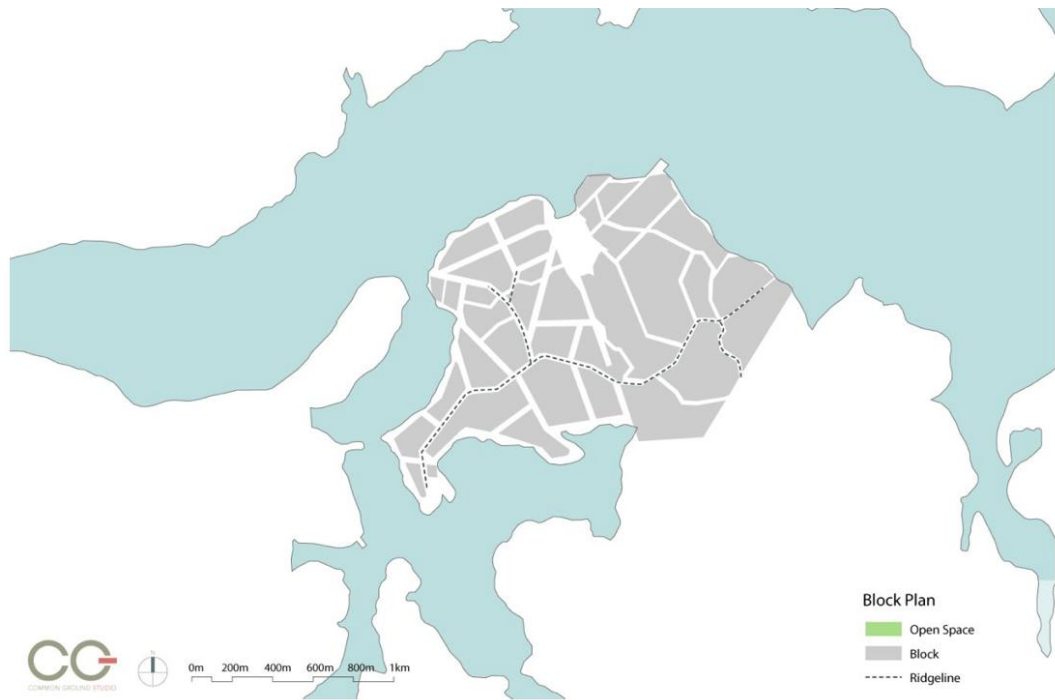
6. I was a lecturer at the University of Auckland between 1989-2002, within the School of Architecture, Property and Planning, lecturing in landscape planning, urban design, economic development and heritage planning. I have published extensively in my field, particularly with respect to achieving sustainable urban development.
7. In 2000. I co-authored a book 'Manual for Sustainable Neighbourhood Development' (Christina du Plessus, James Lunday and Pierre Swanepoel – Pretoria, ISBN 0-621-29983-9). I have appeared on radio and television as an urban design commentator and recently in a feature documentary about the Christchurch earthquake, When a City Falls. I am the recipient of several National and International awards related to Urban Design and Urban Regeneration.
8. I was a sitting member of the new Auckland Council Urban Design Panel (ACUDP). I have previously been a member of the Manukau City UDP, and helped to form the Queenstown UDP. I have completed and passed the Making Good Decisions Programme sponsored by MfE.
9. I was the principal and founder of Common Ground Urban Design and Architecture Ltd (Common Ground Studio) a multi-disciplinary practice focused on Urban Design and Development and was instrumental to undertaking the masterplan and background documents for the Development of the Rangitahi Peninsula.
10. I have completed a number of large-scale structure planning exercises resulting in Master-planned or Urban Design-led Plan Changes and Variations. These include:
 - (a) Pegasus Town (Canterbury),
 - (b) Homestead Bay and Coneburn Study (Queenstown),
 - (c) Ngarara Farm and Waikanae North (Kapiti Coast), and
 - (d) Taupo Eastern Urban Lands,
 - (e) Albany City Plan, and
 - (f) New Lynn TOD and Tamaki TOD (Auckland),

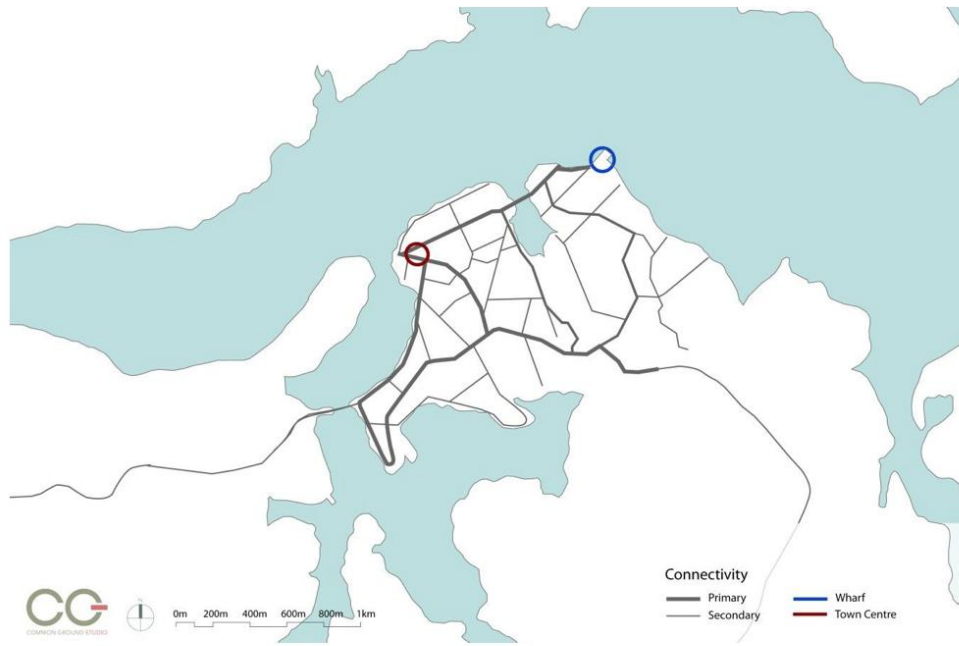
11. Recently I have undertaken a report for Hamilton District Council to look at methods to increase density, variety and affordability whilst delivering best practice Urban Design Outcomes. In this I drew on examples of master-planned Developments including the Rangitahi Peninsula that were all driven by Structure Plans (or ODPs), Design Guidelines and locationally specific planning regulations.

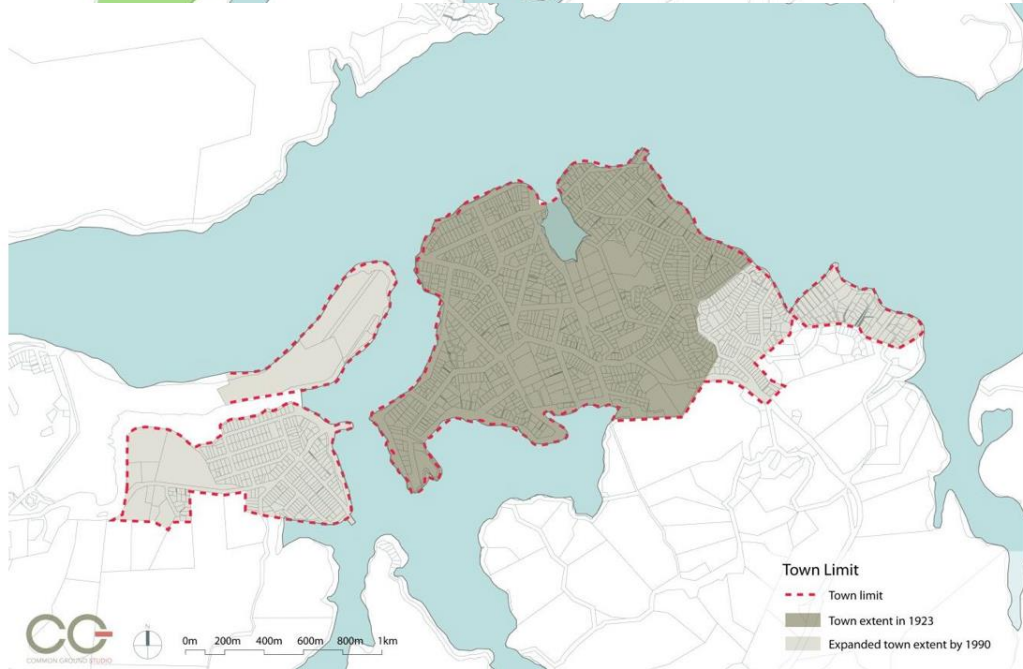
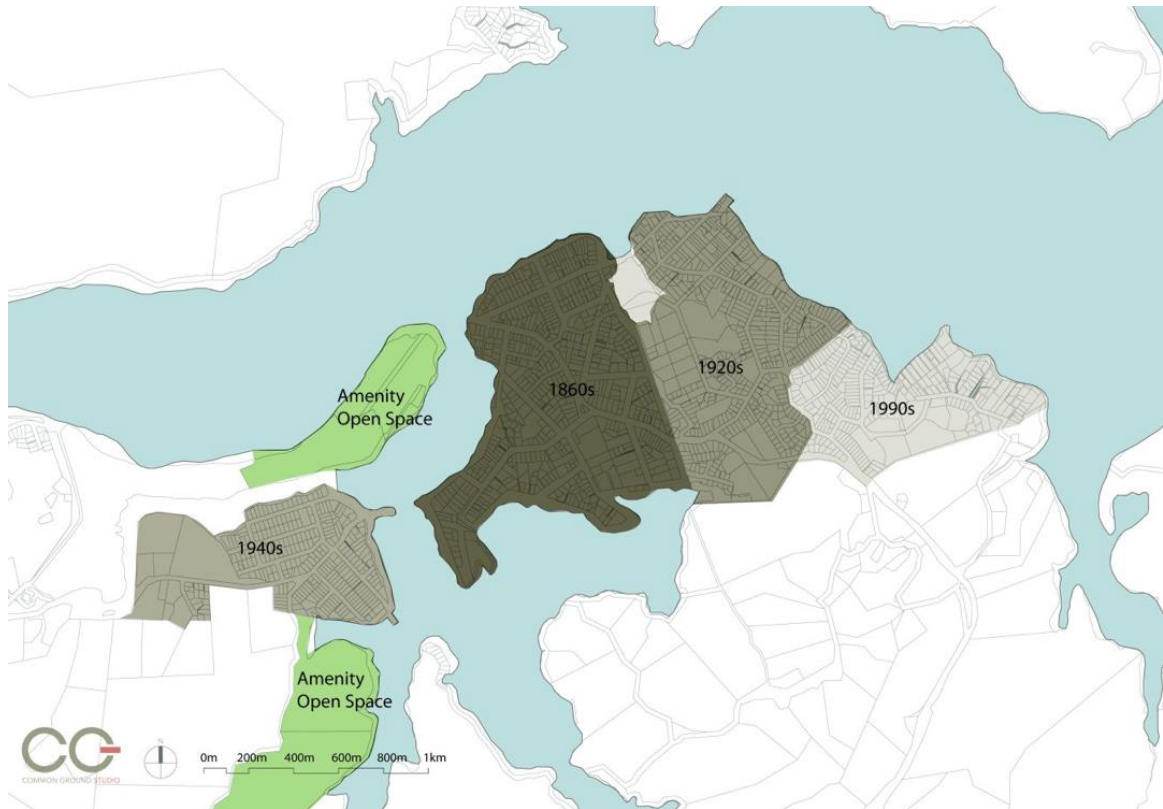
ANNEXURE B – Character

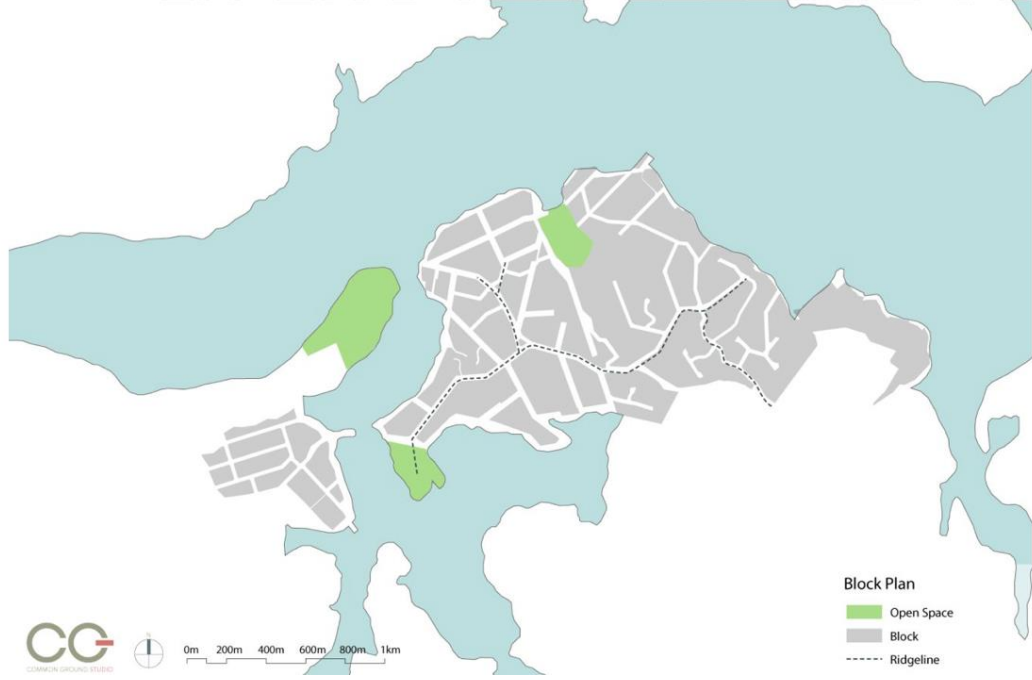
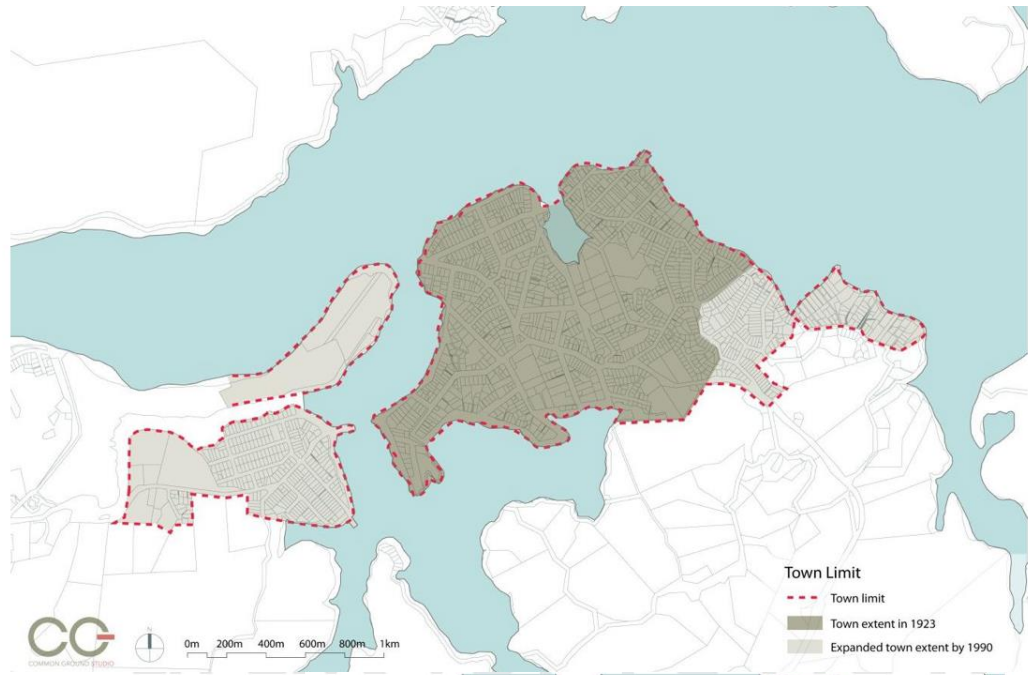
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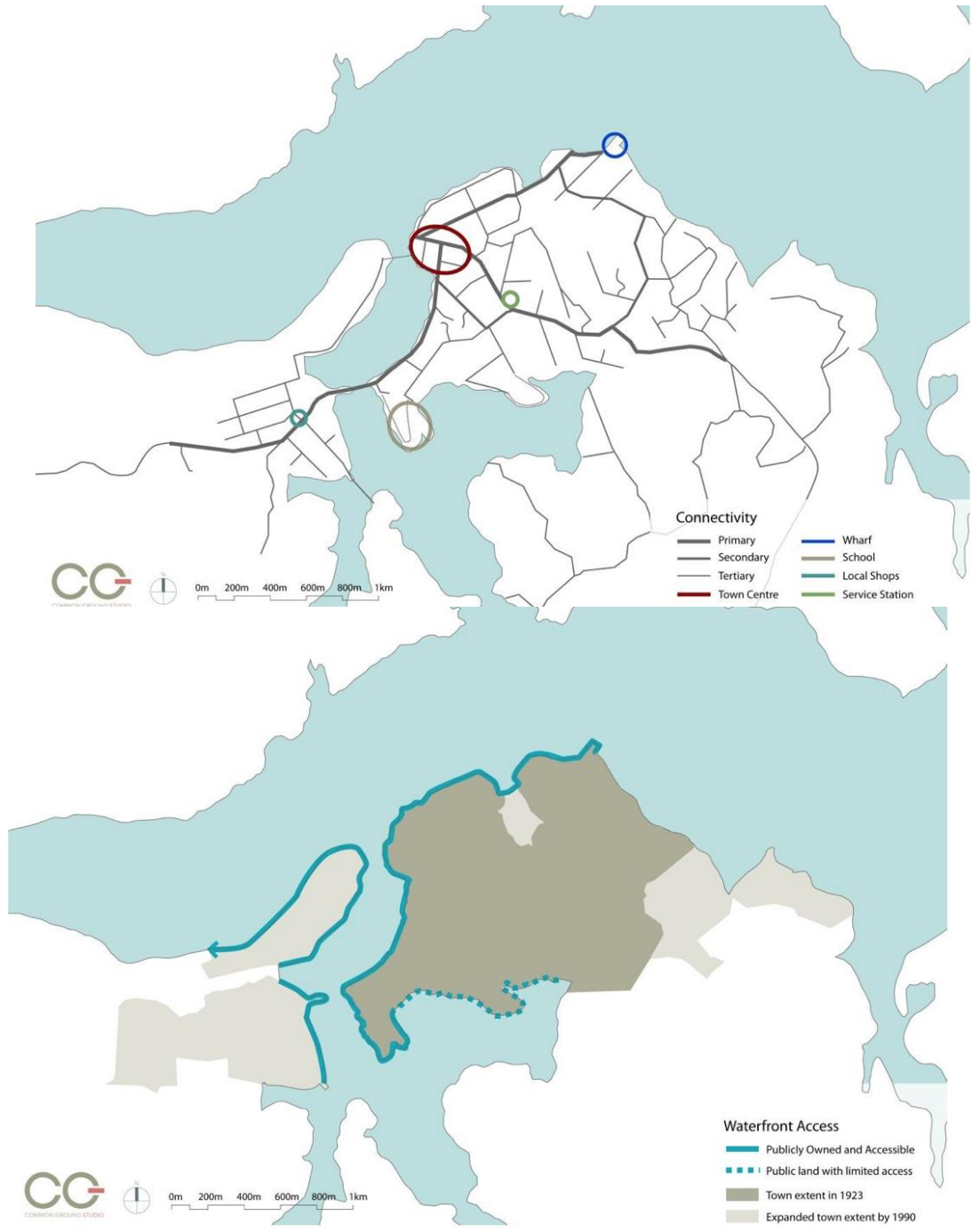
ANNEXURE C – Historic Growth

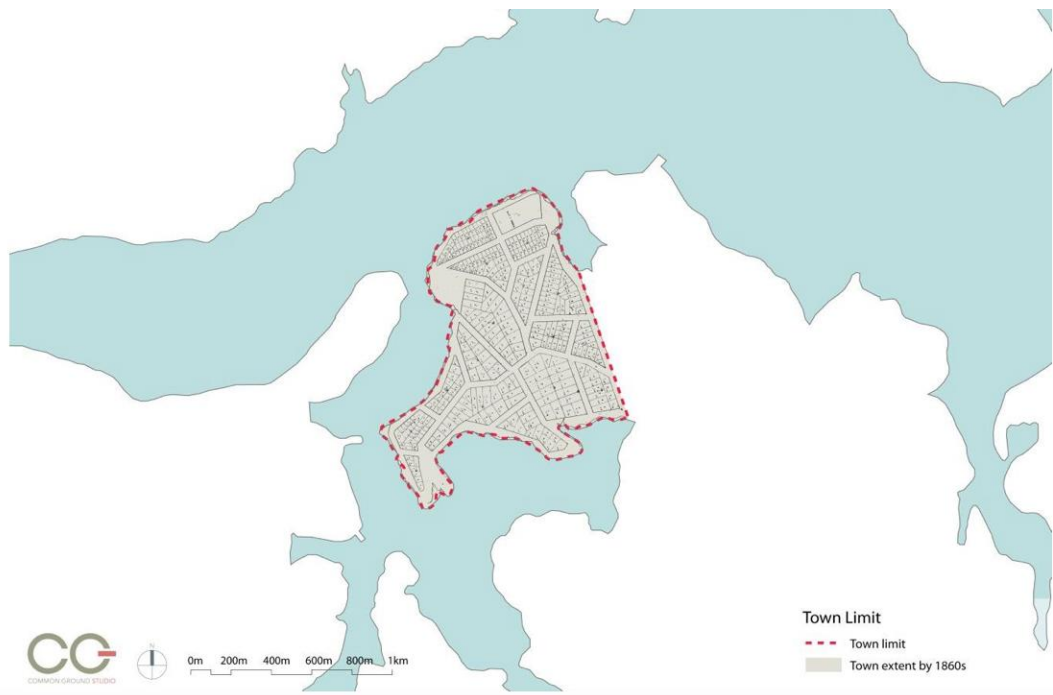
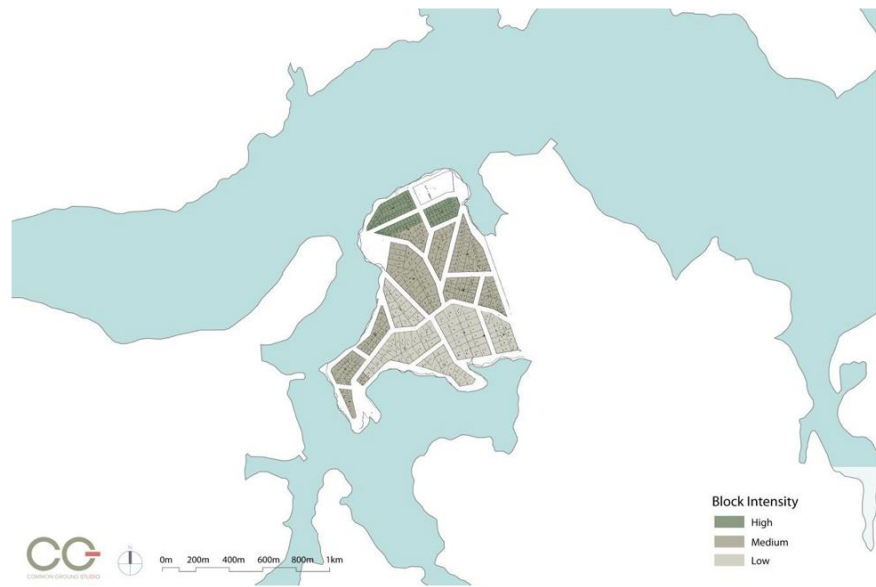


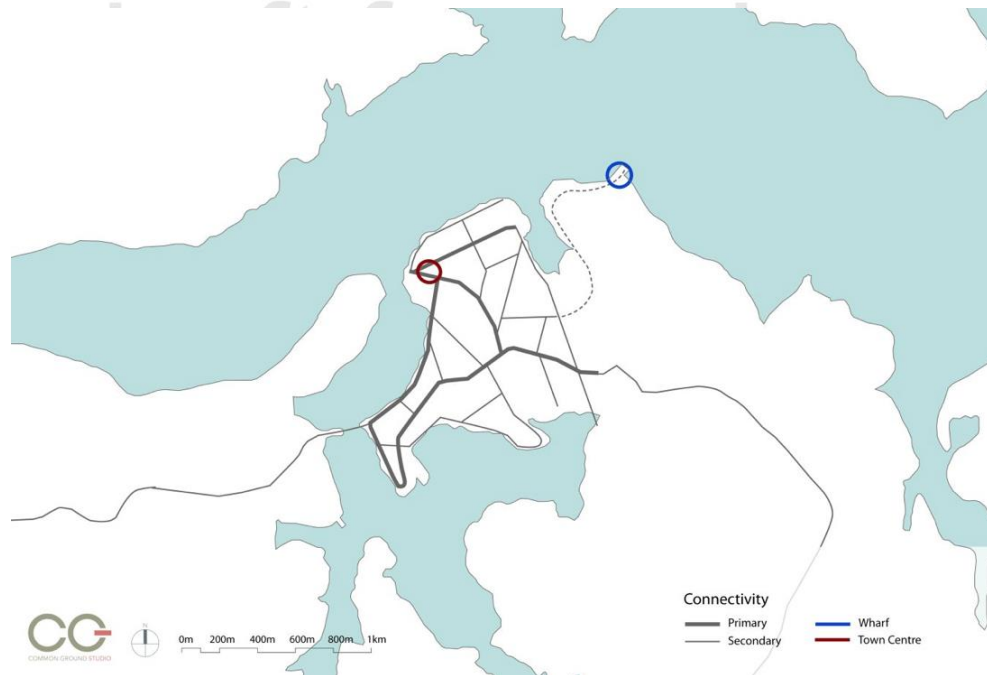
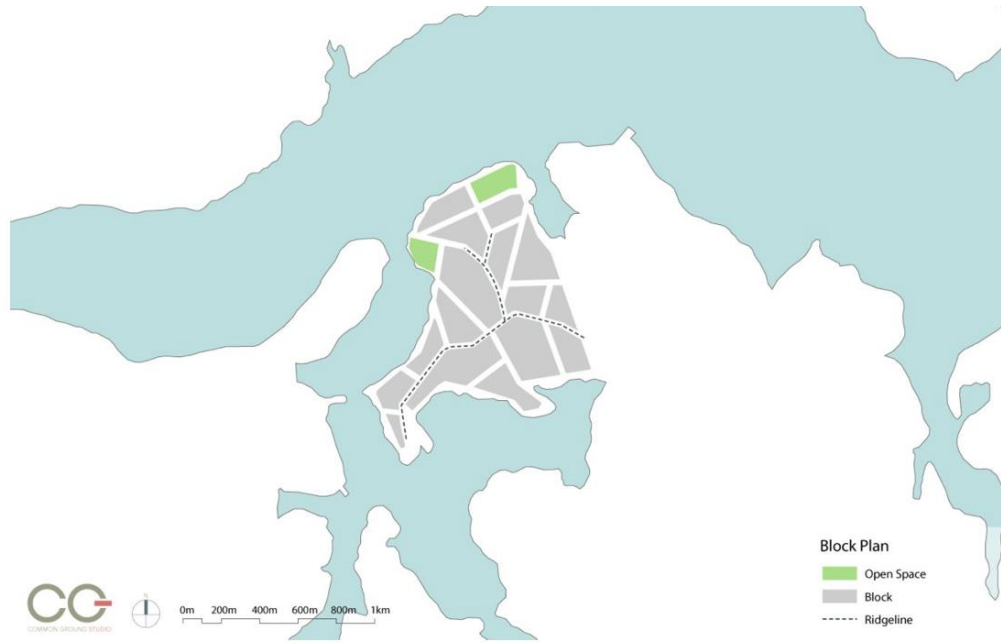


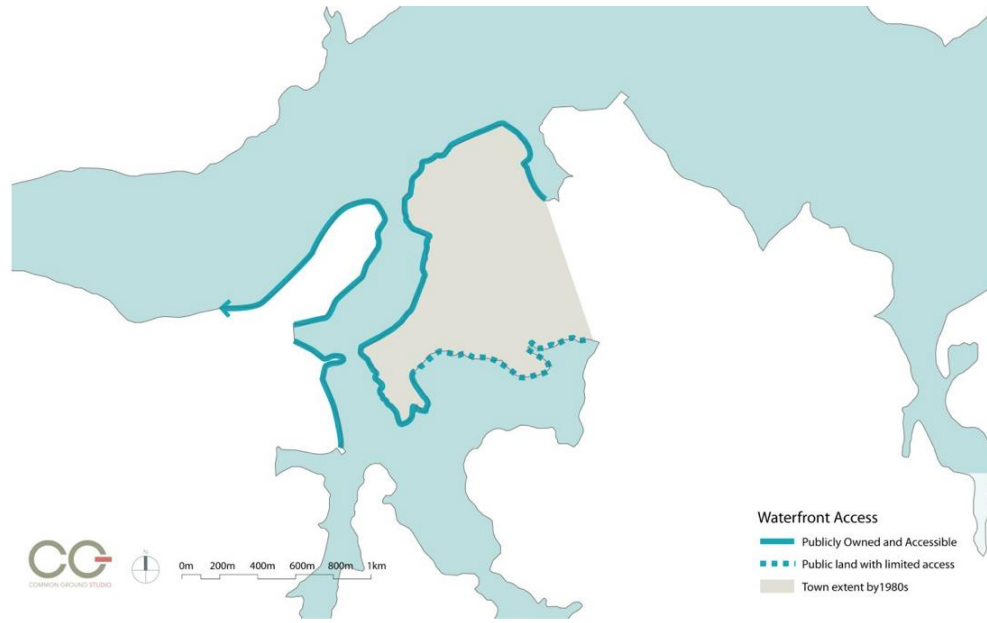
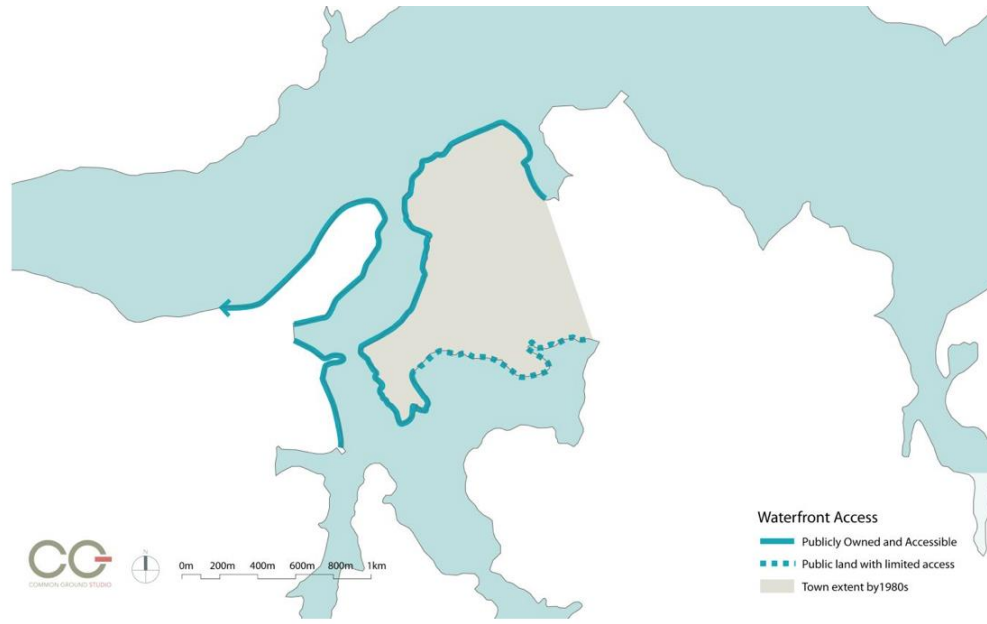


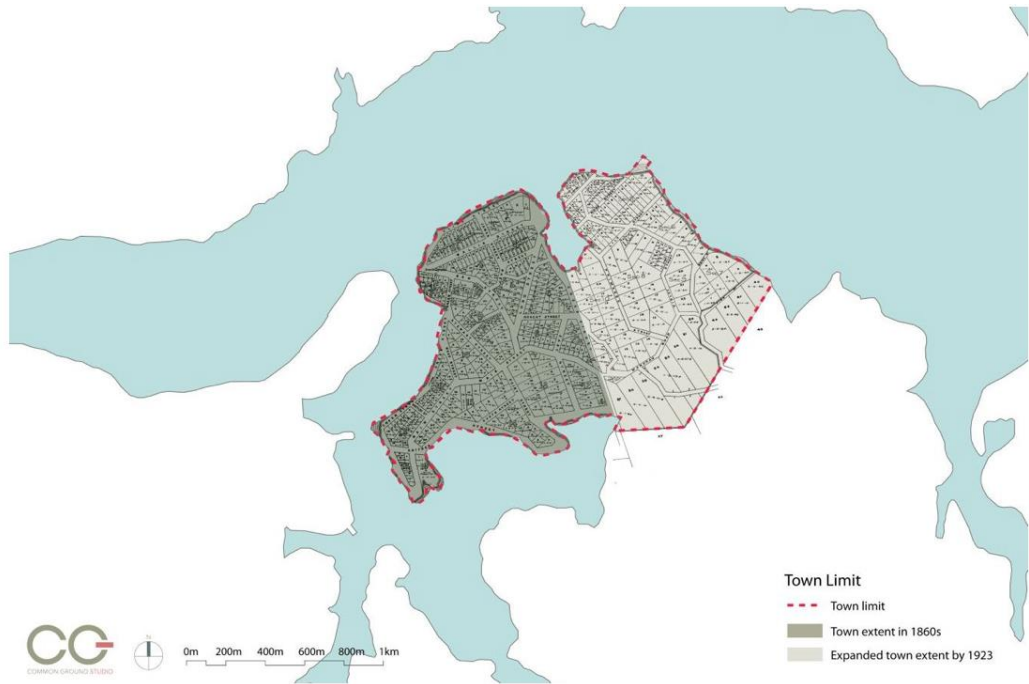


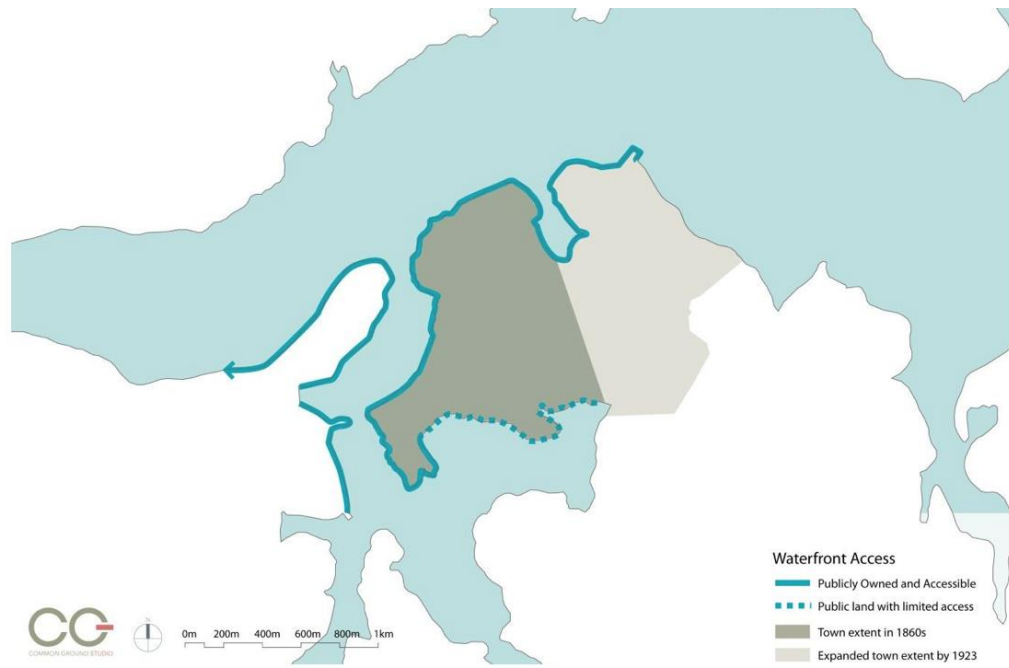












0m 200m 400m 600m 800m 1km