

**WAIKATO DISTRICT PLAN REVIEW SUBMISSION**

**SUBMITTER**                      KONING FAMILY TRUST

**TOPIC:**                              Extent of residential zoning at Raglan

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**REBUTTAL EVIDENCE OF JOSHUA JAMES HUNT**

Landscape and Visual Effects

3 May 2021

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## Introduction

1. My full name is Joshua James Hunt. I have outlined my experience and qualification within my Statement of Evidence, dated 17 Feb 2021, and am providing this rebuttal evidence in relation to the evidence of witnesses for other submitters regarding the Koning land.
2. I once again confirm that I agree to abide by the Environment Court's Code of Conduct for Expert Witnesses as specified in the Environment Courts Practice Note 2014. The evidence below is within my area of expertise, except where I state that I rely upon the evidence of other experts, in which case I have acknowledged that reliance. I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed.
3. The following statements of evidence are addressed below;
  - Evidence in Reply – Rachel De Lambert
  - WDC Solid Waste Team (Letter)
  - Reporting Planners sn42A Report
  - Summary of updates to the Te Hutewai Structure Plan

## Evidence in Reply – Rachel de Lambert

4. In her "evidence-in-reply" to the Koning's proposal made on behalf of Rangitahi Limited, Ms de Lambert states that the approach we have taken is supported in principle<sup>1</sup>. The project team have tailored the level of detail contained within the Draft Te Hutewai Structure Plan to go beyond what we considered necessary at this stage of the District Plan Review (e.g. Rezoning). The intention has been to outline the site structure in a manner that allows for specific detailed design to follow.

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<sup>1</sup> Evidence in Reply of Rachel Virginia De Lambert For Rangitahi Limited – Para 10.

5. Through the Development Plan Document and Te Hutewai Structure Plan, the key constraints and opportunities have been identified and are considered to direct appropriate development in this location. Through consideration of archaeological areas, site specific ecological responses, avoidance of areas with geotechnical constraints, differentiation of character areas and identification of access points onto the property, we are able inform how the site will respond to this landscape through a master planning approach.
6. It has been suggested that a higher level spatial plan be developed for Raglan<sup>2</sup>. I agree with this approach, and consider that the Te Hutewai Structure Plan (Koning land) can ensure effective integration with wider development by clearly indicating the key connectivity locations (vehicle and pedestrian).
7. The surrounding land uses already provide limitations to opportunities for development integration with the surrounding area as currently the Koning land is essentially bound by the oxidation ponds to the north, Te Hutewai Rd and the Raglan Golf Course to the east, the Raglan Resource Recovery Centre (“Xtreme Zero Waste”) to the south, Wainui Road with its stretch of lifestyle lots and the Wainui Reserve / Ngarunui Beach to the west. However, one of the key opportunities for this site is that it spans the gap between Te Hutewai Road and Wainui Road (south of the oxidation ponds) which will provide a desirable east-west connection.
8. In principle, an overarching plan which incorporates all of the planned growth around Raglan is sensible. However, when considering the Koning landholding in single family ownership, and the existing constraints around the perimeter of the property, it is my

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<sup>2</sup> Evidence in Reply of Rachel Virginia De Lambert For Rangitahi Limited – Para 15.

opinion that the proposed rezoning to residential would not compromise development in the wider area or need to wait for a higher level spatial plan. Although it has been suggested that a limitation of the Te Hutewai Structure Plan is the restriction to cadastral boundaries, we have undertaken a much wider contextual analysis within the Development Plan Document to ensure that this development is not isolated within the Raglan setting.

9. That being said, there are two adjacent land holdings which would allow for direct linkages. This includes the property immediately north of the Koning land on Te Hutewai Road, which is already zoned as residential (undeveloped), and the Rangitahi land to the south. I consider that connectivity can be addressed through the proposed Te Hutewai Structure Plan, and that its inclusion does not stop the preparation of a much wider Raglan spatial plan. The Te Hutewai Structure Plan has been updated to provide greater clarity around an intention to link to the Residential Zone on the northern boundary, as well as reinforcing the intention to provide access connections south onto the Rangitahi land.

### **WDC Solid Waste Team (Letter)**

10. I have reviewed the letter from the WDC Solid Waste Team<sup>3</sup> and can appreciate the perceived reverse sensitivity that a change to residential development can bring.
11. This was initially considered within the Te Hutewai Structure Plan by including a requirement for some form of interface control, such as a potential planted buffer, to be implemented along the boundary in question.

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<sup>3</sup> WDC Solid Waste – Letter in response to rezone in Raglan 2021

12. In their letter, the Solid Waste Team states that;

*"The solid waste team request that consideration be given to a buffer zone at the northern boundary to ensure that any future residential type of development can cohabitate harmoniously with the current operations and closed landfill at 186 Te Hutewai Road."*

13. In this regard, we consider a more specific response can be made at this part of the Koning development site. We have amended the Te Hutewai Structure Plan to include a 50m setback from the boundary to any proposed dwelling, along with a densely planted boundary treatment. Additionally, there is a large vegetation/open space located on both the Xtreme Zero Waste site and Koning land along the boundary in question which will further assist with the separation of the lawful waste operation and proposed Residential activities.

## **Reporting Planners s42A Report**

14. The 'missing' archaeology site is identified as 'Area B' within the Archaeological Assessment of Sian Keith. This area of interest had stated that there was *"No clear visible evidence for archaeology identified, however future subsurface testing is recommended in this location"*<sup>4</sup>. This has now been included in the updated Te Hutewai Structure Plan.

15. Within the s42a report (Hearing 25: Zone Extents Raglan – Para 96), there is comment around Ms de Lambert's Evidence in relation to the Koning land being structure planned in isolation and the straight line boundaries defining character areas. I have

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<sup>4</sup> Archaeological Assessment: Koning Family Trust, Raglan - Prepared by Siān Keith, October 2020. Section 8.1.2.

addressed the isolation above, however the interpretation of the 'straight line' character areas warrants discussion. While I agree that wider landscape consideration is necessary for understanding urban growth patterns, it is my opinion that this has already been undertaken within the Development Plan Document. Furthermore the character areas have intentionally been drawn as a relatively fluid 'bubble' as to not overemphasise cadastral boundaries. The identified character areas simply relate to development opportunities and the creation of differentiated clusters based on proximity to the various character areas exhibited around the Koning land.

### **Summary of Updates (Te Hutewai Structure Plan)**

16. Through the consideration of evidence of witnesses for other submitters regarding the Koning land, the following updates have now been incorporated into the Development Plan Document and the Te Hutewai Structure Plan:

- Clarification of a potential northern vehicle link to the adjacent property along Te Hutewai Road;
- Confirmation of the intention to provide a link to the Rangitahi land to the south;
- Confirmation of a 50m dwelling setback and a planted buffer treatment at the boundary to the Xtreme Zero Waste Site; and
- Inclusion of the 'Area B' Archaeological Site of Interest.

Joshua Hunt

3 May 2021