

**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**

**KONING FAMILY TRUST**

Submitter [No. 658]

**AND**

**WAIKATO DISTRICT COUNCIL**

Local Authority

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**EVIDENCE-IN-REPLY OF  
RACHEL VIRGINIA DE LAMBERT FOR RANGITAHİ LIMITED  
(LANDSCAPE ARCHITECTURE)**

Dated: 10 March 2021

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## **INTRODUCTION**

1. My full name is Rachel Virginia de Lambert.
2. My qualifications and experience are set out at paragraphs [1] to [4] of my Evidence in Chief (**EIC**) on behalf of Rangitahi Limited (**Rangitahi**) for Hearing 25 – Raglan.

## **CODE OF CONDUCT**

3. I confirm 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.

## **BACKGROUND**

5. I have been retained by Rangitahi to provide Evidence in Reply (**EIR**) to the evidence in respect of a rezoning request for Raglan filed on behalf of Koning Family Trust and Martin Koning (**Konings**) including the proposed 'draft Te Hutewai Structure Plan' (**Draft Structure Plan**).
6. I provided EIC in support of Rangitahi's submission on the Proposed Waikato District Plan (**pWDP**) seeking provision for future urban growth in Raglan West.
7. As detailed in my EIC at paragraphs [8] to [11], I am familiar with the Raglan West area and surrounding environment having been involved in a number of plan change, district and regional plan submission, and resource consent related matters within and surrounding Raglan and Whale Bay. I have assisted the Raglan Land Company Ltd and Rangitahi since around 2010 in respect of:
  - (a) The plan change and Structure Plan for the Rangitahi Peninsula;
  - (b) Resource consents and landscape design associated with the upgrade of Opotoru Road upgrade;

- (c) Previous submissions to the Proposed Waikato Regional Policy Statement (March 2012); and
  - (d) Participation in the 'Raglan Character Study' workshop (11 March 2020).
8. In preparing this EIR I have read the following documents:
- (a) The relevant EIC in respect of rezoning for Raglan filed on behalf of Konings, and in particular I have reviewed the Draft Structure Plan (text and plan) included in that evidence;
  - (b) Rangitahi's submission and further submission on the pWDP;
  - (c) The other EIR on behalf of Rangitahi;
  - (d) The documents noted at paragraph [12] of my EIC.

#### **TE HUTEWAI STRUCTURE PLAN**

9. I understand that the Draft Structure Plan is intended to be "*conceptual (e.g. specific street and housing typologies have not been detailed or arranged)*" however it is intended to "*provide clarity as to the intended development future of this location*".
10. In principal I support the approach to the identification of potential development areas within the approximately 63ha in the ownership of the Koning Family Trust that is the subject of the Draft Structure Plan.
11. The Draft Structure Plan appropriately identifies the constraints to development including archaeological, ecological, and geotechnical 'no go' areas, and management techniques to enable development.
12. I also support the concept of character areas reflecting the varied coastal, more rural and hinterland 'amenity' qualities of the land.
13. However, the Draft Structure Plan has as its sole focus the land parcel owned by the Konings – and is confined by the cadastral boundaries. In my opinion, an isolated planning focus on the land in individual ownership clearly demonstrates the need for an overarching, higher level Spatial Plan for Raglan. Such a plan would inform the future structure plan for all urban growth

areas in Raglan – including the Te Hutewai growth area – and thereby ensure the big picture landscape and urban form aspects of the settlement are optimised.

14. The spatial extent of the Draft Structure Plan is limited by the cadastral boundaries associated with singular landholding. In my opinion, this limitation is a significant shortcoming. The potential adverse landscape effects associated with the ‘straight line’ cadastral boundaries defining the identified character areas demonstrates the need for a wider landscape consideration to inform an understanding of the appropriate pattern of urban growth for Raglan.

### **RAGLAN-WIDE SPATIAL PLANNING**

15. Higher level Raglan-wide spatial planning sought by Rangitahi would address this issue defining on the basis of landscape / landform the appropriate edges to urban character areas. This is particularly important in the south of the settlement where the interface is to the culturally, topographically, and visually important backdrop of Mt Karioi.
16. Higher level spatial planning to inform site specific structure planning will also ensure:
  - (a) All modes of connectivity – vehicular, cycle and pedestrian – are fully explored and multiple access options provided as part of an interconnected Raglan wide framework of connectivity.
  - (b) Open space connectivity and wider Raglan landscape biodiversity / habitat enhancement.
  - (c) The need and appropriate spatial distribution of smaller neighbourhood centres to support walkable catchments for day to day needs (the 10 minute city).
  - (d) Associated with neighbourhood centres opportunities for smaller lot / higher density development is identified to ensure optimised development yields are achieved where greenfield development occurs.

- (e) Opportunities for input from tangata whenua and the local community.
17. In this respect of points (c) and (d) I note that the Draft Structure Plan proposes adoption of the generic Residential Zone provisions, including the standard of 450m<sup>2</sup> minimum lot size. In my opinion this approach is likely to lead to a generic suburban form of development which misses the opportunity to properly respond to the characteristics of the land.
18. A more nuanced mix of lot sizes, including lots of significantly smaller size in appropriate locations, will support diversity of choice / development typology and enable development to better fit the attributes of the location and qualities of Raglan's distinct character. This approach could well secure an overall increase in residential yield (in the case of the Koning land above the 300-400 dwellings identified) and thereby make optimised use of the greenfield land for development.

## **CONCLUSION**

19. In conclusion, therefore, it is my opinion that Raglan-wide spatial planning should be undertaken in advance of any further live zoning in Raglan. This spatial planning should be independent of land ownership whilst recognising the development aspirations of the various landowners including land in common Maori ownership.
20. Once this higher level spatial framework is in place, site specific structure planning can follow, delivering on the spatial plan and responding in more detail to the characteristics of the subject landholding and the neighbouring land that collectively forms the Raglan settlement.

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**Rachel de Lambert**  
**10 March 2021**