Zoning Hearings – Raglan

Evidence Summary Bundle for Koning Family Trust and M Koning – Submitter 658

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Archaeology - Sian Keith

1. I have undertaken desktop research and visited the Koning site in order to assess what archaeological values may be present and may be affected by the proposal to rezone the land for residential development.

2. A field survey of the Koning site led to the discovery of three visible archaeological sites within the rezoning area. These sites have been recorded on the NZAA database as R14/457-459. Two represent (as a minimum) shellfish processing and/or consumption areas (middens) and the third crop storage (pit site). All three sites are determined to represent pre-European Māori activity. This is based on their similarity in nature to the numerous other documented archaeological sites recorded in the wider environment. Such site types are some of the most common types of pre-European archaeological evidence in New Zealand. These three sites may extend further than their current visible extent.

3. No evidence has been gathered to date to suggest that there are sites of exceptional archaeological value located within the zone change proposal site. Additional sites may be present within the rezoning area, however if they are present, they are currently concealed by topsoil and would require invasive techniques to identify. Based on the wider recorded archaeological landscape it is anticipated that the type of sites which could be present subsurface include shell middens, fireplaces, and to a lesser extent, storage pits.

4. Based on the known settlement patterns of the harbour it is likely that most archaeological sites are focused immediately on the harbour edge and hills overlooking the sea and watercourses. The rezoning land is set back some 300m from this environment and on subsoils which are not favourable for cultivation and not known to be the focus of settlement.

5. Future earthworks are likely to see some modification to one or more of these recorded sites. Intrusive archaeological investigations (i.e. test trenching) can be the only way to confidently determine the extent of archaeological activity and the presence/ absence of additional archaeological sites.

6. I have recommended that an archaeological authority be applied for in relation to future earthworks to allow for investigation and recording of the two shell midden sites to mitigate

their modification or destruction during any future earthworks. This is because such sites are common, and these two do not appear at present to hold high archaeological value.

7. I have recommended that the archaeological authority and associated investigations should also focus on testing of an additional six areas identified as being of potential archaeological interest.

8. I have recommended that the pit site (R14/459) be preserved within any future plans to subdivide the land. This is based on its apparent good preservation, and because it is a good representative sample of a series of these archaeological features.

9. I have recommended that the Koning Family Trust seek input from iwi on their traditional knowledge of this land and the recommendations I have made.

10. Based on my current understanding of the archaeological values of this land, I do not think the rezoning proposal should be altered based on known, considered, or observable archaeological values.

Land Contamination - Nigel Mather

1. 4Sight was engaged by the Koning Family Trust to undertake a PSI in August 2018.
2. The purpose of the PSI was to provide a high level assessment of potential implications for a proposed rezoning of the site relative to the requirements of the NESCS.
3. The investigation included a review of selected publicly available information for the site (historic aerial photographs, council records), discussion of site history with the landowner, collection of a limited number of soil samples, and preparation of a report to summarise the results of the PSI.
4. The PSI was not intended to fulfil the requirements of a Detailed Site Investigation ("DSI"), or to fully characterise all areas of potential soil contamination at the site.
5. Based on the site history, and to support the proposed rezoning, limited sampling was undertaken to determine potential impacts to soil from superphosphate application (presence of cadmium).
6. Although the historic broad scale application of superphosphate has been identified at the site, shallow soil sampling has indicated that concentrations of cadmium in soils across the proposed residential zone are below the NESCS SCS for rural residential (25% produce consumption) land use.
7. Consideration should be given to the potential for lead and asbestos to be present in shallow soils surrounding existing buildings, and for contaminants around the rubbish pile on site, during future soil disturbance activities. However, as this potential risk is associated with existing rural residential land use this is considered unlikely to present a significant or widespread risk associated with the proposed rezoning. Outside of the existing residential dwellings on the site, soils across the residential re-zoning area of the site are considered suitable for reuse on the site from a human health risk perspective.

8. Overall, contaminants in shallow soils across the site are considered, in general, highly unlikely to present a risk to human health associated with proposed residential land use. On this basis the change of land use is a permitted activity under regulation 8(4) of the NESCS.

9. The PSI also notes that a WDC owned refuse transfer station is located directly adjacent the southern boundary of the site and has historically been used for land filling operations. If contaminants from the refuse transfer station or historic land fill activities have been transported to the site via a stream that flows both though the refuse transfer station and the site, these contaminants are highly likely to be sediment bound and limited to the

stream extent. On the basis the NESCS applies to contaminants in soil we conclude that the NESCS will not apply to stream sediment.

Ecology - Dr Mark Bellingham

1. I consider that the Koning property could be designed in a manner to avoid key ecological features and allow for residential development.

2. The site is large, and the areas proposed for residential development provide significant scope for protection and enhancement of ecological values on the property. I support the recommendations and opportunities described on page 11 of the Koning Family Trust Rezoning document.

3. I note that recommendation 6 – further assessment of bat habitat on the site has been undertaken and minimal bat activity was detected. The enhancement of this riparian corridor along the Ahiawa Stream could enhance bat use of this feature in the future.

4. I understand the ecological opportunities proposed would be addressed at the subdivision consent stage of the process, when more detailed design would be presented to council, including:

    a. Restoration of existing intermittent streams, permanent streams and wetland areas through pest plant and animal control and native infill planting.

    b. Further protection of existing watercourses with riparian buffer planting along the edge of intermittent streams, permanent streams, and wetland areas.

    c. Native revegetation along the stream at the eastern end of the site (Catchment 2).

    d. Pest management planning, as well as the revegetation providing additional benefit by improving lizard habitat and protection from predators.

Three Waters Infrastructure - Constantinos Fokianos

1. ***Wastewater***. There are a few options for wastewater configuration, regarding the point of connection to the existing network. Some minor pumping of wastewater is expected to be required inside the development's wastewater network. The pump station(s) will be designed according to the RITS standards. The planned WWTP upgrade will be sized to cater for the wastewater of the proposed development.

2. ***Water***. The connection of the proposed development's water supply infrastructure can take place inside Koning Family's property. Dedicated water supply storage will be needed to regulate the demand peaks from the development, without putting additional stress on the existing scheme. Additional information regarding Raglan's water supply scheme daily demand profile will be required to model the intake/uptake function of the proposed tank over a 24h, 48h period or more and its effect to the daily peak of the existing network. Part of the proposed development's water reticulation will require additional pressure to meet RITS standards.

3. ***Stormwater***. Based on the scheme level hydrologic and hydraulic modelling, the stormwater management of the proposed development could:

    - Achieve water quality and quantity requirements within the special constraints of the site. LID practices are proposed to treat, attenuate and control stormwater at source;

    - Be in general accordance with Waikato District Council's requirements; and

    - Not cause any adverse effects such as flooding, erosion, or other environmental impacts by ensuring the peak flows from the site do not exceed the existing peak flows and the downstream flood level does not exceed the existing flood levels.

4. Based on the information currently available, I do not foresee any significant technical barriers to achieving appropriate outcomes in relation to the 3 waters servicing of the Koning development site.

5. In addition to ensuring the detailed design is in compliance with the Waikato District Plan and Waikato Regional Council guidelines, it is recommended that the following actions are taken during the detailed design phase of development:

- Detailed hydraulic modelling of Ahiawa Stream, in both its existing and proposed conditions, should be undertaken to delineate the flood limits of the stream and the available area for residential development.

- Further investigation on the flooding conditions (if any) downstream of the proposed development is recommended during the next stages of the design, including modelling of the existing streams down to their discharge to Wainui stream. Tidal influences should also be included in the model to assess the existing flood risk and the effects of the proposed development.

- Design of appropriate measures to positively support fish passage and habitat enhancement within the stream.

Landscape and Visual - Joshua Hunt

1. In my Landscape and Visual Effects Assessment, dated 11 February 2021. I conclude that the potential adverse effects arising from this proposal on landscape and visual matters range from very-low to moderate.

2. The key reasons for supporting this application, in relation to landscape and visual effects, include that:

    a. The site is well screened from the wider area by the natural landform;

    b. The site is directly adjacent to residential zoning which will provide for urban development in the immediately surrounding rural landscape;

    c. The majority of the site is already within an 'Indicative Urban Limit' which seeks to provide a more compact urban form;

    d. The proposal will provide vehicle and pedestrian connectivity by linking Wainui Rd and Te Hutewai Rd (and possibly even then connecting up across to the southern end of the Rangitahi Peninsula development);

    e. The site is naturally backdropped by landforms with greater elevation and development on this site will not compromise the appreciation of the Mt Karioi Outstanding Natural Landscape further south.

    f. The site does not contain any areas of High, Very High or Outstanding Natural Character, nor does it have any identified Significant Natural Areas (SNA's).

3. A transition from the current rural land use toward an urban context, in the vicinity of the site, is already anticipated. This is as a result of the existing residential zoning abutting the north-east corner of the site, along with the Indicative Urban Limit (Future Proof Strategy, Waikato 2070 and PWDP). The proposed rezoning of this site to residential will clearly alter the present rural snapshot, however recognition of the site context and characteristics will result in an integrated development which positively contributes to Raglan and its surrounds.

4. The proposal will naturally retain areas of open space (due to geotechnical constraints and existing gullies). The Preliminary Development Plan has responded to the site through a

master-planned approach, the development will be staged as demand presents itself, the development will reflect the natural landforms and ecological systems, it will contribute to desirable lifestyle options in the area and has the opportunity to provide good vehicle, cycling and pedestrian cross-connectivity between existing and consented developments.

5. When considering the Koning landholding in single family ownership, and the existing constraints around the perimeter of the property, it is my 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.

6. 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.

Geotechnical - Ken Read

1. Identification of potential geotechnical constraints with respect to residential development of the subject land has been carried out in two phases to date – an initial desk study and site inspection identified slope instability and possible weak or soft compressible soils to be potentially significant constraints; followed by further work involving boreholes, test pits and geophysical surveying techniques to better assess these risks together with liquefaction risk, and preliminary earthworks design calculations to help determine the practicality of possible remedial works.

2. The borehole and geophysical investigation identified a previously unrecognised constraint with respect to solution of limestone bedrock to form open voids beneath one part of the site.

3. I have also prepared a preliminary Natural Hazards Risk Assessment (as required under Section 106 of the Resource Management Act at the time of seeking resource consent) which is presented in Appendix D of my Preliminary Geotechnical Investigation Report.

4. In my preliminary Natural Hazards Risk Assessment I identify the erosion of cut and fill batters, and gully areas, bearing capacity failure, and subsidence due to soft soils as being 'high' or 'very high' latent risk. I also identify landslip (global slope stability and soil creep), and subsidence due to sinkholes as being of 'extreme' latent risk. All of the 'high' and 'very high' latent risks I identified can be remediated to 'medium' and 'low' residual risk by adopting appropriate engineering measures. 'Medium' is the highest acceptable level of residual risk.

5. I concluded that the 'extreme' latent risk due to sinkholes could only be remediated to 'very high' level of residual risk, which is not an acceptable level for development. The particular area of land where the level of 'extreme' latent risk is applicable is discussed in my evidence below and is to be excluded from the proposed residential sub-division development.

6. I consider that the land under consideration for residential sub-division development can be developed for this purpose provided good engineering practice is followed.

7. I further consider, that with the exception of the 'High Hazard Slope Instability' area shown on Drawing 02 of my evidence, the level of engineering required is within that regularly

undertaken in the wider area and of a similar level to that adopted in nearby sites on the same geological strata and terrane.

Transportation - Rhulani Baloyi

1. The overall transportation effects of the rezoning proposal on the adjoining and wider road networks are expected to be more than minor, but are able to be managed and mitigated to an acceptable level if the following recommendations are implemented.

    a. Upgrading of Wainui Road Bridge

        i. The planned upgrading of the Wainui Road one-way bridge ("Wainui Road Bridge") to a two-lane bridge (more specially, the timing of the planned upgrade) has been raised by Council's reporting officer, Emily Buckingham, as one of the matters that need addressing in order to support live zoning the Koning land to Residential.

        ii. Ms Buckingham considers that there should be a specific infrastructure provision/trigger requiring the Wainui Road Bridge to be double laned prior to any occupation of dwellings. I disagree with this recommendation.

        iii. While I agree that capacity and safety related upgrades at the Wainui Road Bridge will be required to accommodate the full anticipated yield of the Koning land (300 to 400 dwellings), I consider that an alternative solution (the installation of traffic signals on the bridge approaches) can be implemented in the interim in order to mitigate the present capacity and safety effects observed at the bridge should the planned upgrade works at the bridge not be concluded by 2024 as per the 2018 Long Term Plan (LTP).

        iv. As I have outlined in paragraph 43 of my EIC, the signalised bridge is anticipated to operate at acceptable levels of service up to the 2044 horizon year (with the full rezoning proposal traffic added to the 2044 baseline).

        v. While the draft WDC 2021 LTP has created uncertainty with regards to the timing and exact design of the Wainui Road Bridge upgrade works, I anticipate that even with the deferral of the bridge upgrade to a later period (2031-2035), the proposed interim solution (signalisation) will provide sufficient capacity to mitigate any adverse effects on the functioning of the transport infrastructure.

vi. Furthermore, the Submitter is willing and able to enter into a development agreement with the Council regarding the implementation of this proposed interim solution.

b. Requirement for an ITA:

i. I agree with Ms Buckingham that a requirement for an Integrated Transport Assessment (ITA) and/or transport upgrade thresholds need to be included within the planning provisions in order to ensure that the Koning proposal does not compromise the operation of transport infrastructure.

ii. As per Ms Buckingham's recommendation, the planning provisions and draft Structure Plan text have subsequently been updated to include the requirement for an ITA to be prepared for any subdivision within the Koning land. That/ Those ITA(s) should address the status of the Wainui Road Bridge upgrade at that time, as well as the need for other upgrades to transport infrastructure, including the Bow Street / Norrie Avenue intersection and the SH23 / Te Pahu Road intersection.

2. In terms of connectivity, a collector road with several accesses off Wainui Road and Te Hutewai Road is envisaged for good connectivity between the proposed residential lots and the two Council managed roads. The draft Structure Plan demonstrates how the future collector road could potentially be extended to neighbouring sites:

a. There is potential to extent the proposed collector road west to provide a much-needed east-west link between the southern extent of the Rangitahi Peninsula Development through to Ngarunui Beach.

b. Development of the subject site could enable the provision of a new road connection to the neighbouring Te Ahiawa residential subdivision. The new road link is envisaged to extend south from the proposed collector road within the subject site to Te Ahiawa Road.

3. Ms Buckingham notes that the location of the proposed Te Hutewai Road intersection for the east-west connection (referred to as Proposed Access 4 in Figure No. 16 of the Koning Rezoning ITA) does not appear to be ideally located for this road to continue to the east, as it is not opposite one of the 'major landholdings' that have development aspirations.

4. The access locations shown in the Draft Structure Plan are indicative and will be refined through further work and investigation. The final intersection locations and configuration will be confirmed in future as part of the future subdivision consents and will be subject to planning and engineering approvals from WDC.
5. Having said that, the Submitter is willing and happy to work with WDC to ensure that the potential for connectivity with the wider area is retained. Connections through to private properties to the north, south and east have been identified on the updated Draft Structure Plan (attached as Attachment 1) to ensure that the potential to integrate with the wider development is not lost. Additional text is proposed to be included in the Draft Structure Plan to provide stronger guidance on this matter.
6. Overall, I having viewed the traffic and transportation-related issues raised in WDC's Section 42A report for Hearing 25, as well as the Transport Peer Review by Beca Ltd, my opinion remains that the Koning rezoning can be supported from a traffic and transportation perspective provided that the transportation infrastructure proposed as part of the Proposal and the identified mitigation measures are implemented.

7. In my opinion, the concerns raised in the s42A report in relation to the timing of dual-laning the Wainui Road Bridge, as well as the uncertainty regarding the location of the potential future connections to the wider area, have not demonstrated that the Koning rezoning is likely to cause unacceptable traffic and transportation effects that cannot be mitigated and therefore is not appropriate for rezoning.

Economics – Fraser Colegrave

Context

1. Raglan is a popular tourist destination, whose resident population is also growing rapidly. The resulting housing pressures led to a detailed study in 2018, which not only confirmed that the town urgently needed more housing to meet demand, but also that housing demand is more complex than usual due to Raglan's significant short-term rental market.

2. The study also identified that housing supply over the short term was roughly only a quarter of projected demand, with projected supply over the longer term equal to about only half of long-term demand. Accordingly, it recommended that the Council and large greenfield landowners accelerate land development and infrastructure provision to meet demand.

3. I used detailed data published by the Ministry of Housing and Urban Development to examine whether the issues identified in the 2018 study remained. The data overwhelmingly confirm that they do, with the median house price increasing by 19% in only two years.

Dwelling Supply/Demand Projections

4. I used the latest data available – at the time of writing – to assess Raglan's likely future supply and demand for additional housing. That data, which was published by the Council under the former National Policy Statement on Urban Development Capacity 2016 (NPSUDC) confirmed that feasible dwelling capacity was far less than projected demand over all timeframes.

5. While I agree with these findings on the supply/demand balance, I also consider that there is likely to be a significant pent-up demand for living in Raglan, which has not been satisfied previously due to a lack of available supply. In other words, historic population growth would have been even faster if the building stock could have supported/enabled it.

6. To help meet this pent-up demand and put a lid on house price growth, the Council and community need to actively consider credible options to help bring more land and dwellings to the market in a timely manner. The proposal to develop my client's land acknowledges and directly responds to this need by bringing forward land that can accommodate approximately 350 new dwellings.

Economic Rationale for/Impacts of the Proposal

7. Next, I considered the economic rationale for, and likely benefits of, the proposal. They include:

    a. Boosting land and dwelling supply to help meet growth in demand over time, which seems appropriate given that the site is surrounded by areas been notionally identified in Waikato 2070 as being suitable for future development.

    b. Creating local competition in the residential land market, which is critical for improving economic efficiency, reducing land prices, and improving housing affordability. Indeed, while other greenfield areas theoretically exist, such as Lorenzen Bay, they are yet to provide any substantial capacity due to various constraints. Accordingly, the proposal will provide a much-needed boost in local land market competition and help the Council to meet its requirements under the National Policy Statement on Urban Development 2020 (NPSUD).

    c. In addition, the subject site is directly adjacent to key infrastructure assets and hence will be relatively easy to service (acknowledging that work is required to expand the capacity of local infrastructure networks),

    d. The need to rezone land well ahead of time due to the significant lead times associated with preparing it for construction. Even if/when the land is rezoned, it takes years to secure the necessary earthworks consents, install local infrastructure, and undertake necessary civil works.

    e. A more generous supply of suitably-zoned land will enable the market to be more responsive to demand over time. In doing so, it will help to alleviate price pressure over time, and help dwellings to be gradually more affordable than they would have been otherwise.

    f. By providing more affordable dwellings, future owners and occupants of the subject land will spend less on weekly rent or mortgage payments than they would have otherwise, which will boost disposable incomes. With a significant proportion of that extra money likely to be spent locally, lower future dwelling prices (relative to the status quo) will also create additional economic stimulus for the wider benefit of the local area through increased household spending over time.

g. Finally, the eventual development of the land and subsequent construction of new dwellings will create significant economic stimulus, and provide jobs for dozens of local and district workers.

h. In fact, I estimated that construction of the 350 (or so) dwellings enabled by the proposal would boost regional GDP by $60 million (including flow-on effects), provide full time employment for 730 people-years, and create $30 million of household incomes.

i. If construction was assumed to take 10 years, these translate to annual impacts of $6 million in GDP, full-time employment for 73 people, and household incomes of $3 million.

8. Given these significant economic benefits, and noting the absence of any obvious adverse economic effects, I strongly support the proposal on economic grounds.

Planning - Aidan Kirkby-McLeod

9. Martin Koning and the Koning Family Trust ("the Submitter") seek that part of their landholdings in Raglan be rezoned from Rural Zone to Residential Zone.

10. The Submitter engaged experts of relevant fields to assess ability for their site to be developed for residential purposes. These assessments have identified a number of opportunities and constraints, notably:

    a. The housing market in Raglan shows that there is higher than average demand for housing, and that there is insufficient land to meet that demand.

    b. Given the surrounding landform, while effects on the landscape are considered to be moderate given the change from rural to urban, the visual impacts of the proposal will be generally low and self-contained.

    c. With the exception of an identified geotechnically 'high-risk' area, that should be avoided, the land is considered to be generally suitable to accommodate residential development.

    d. There are some identified archaeological features present on the site, which will require an Archaeological Authority under the Heritage New Zealand Pouhere Taonga Act to damage / destroy, however there is nothing that would otherwise prevent the rezoning of the Site.

    e. There is the opportunity to maintain and enhance the ecological condition of the Site as part of any residential development. In particular, the Ahiawa Stream corridor along the western boundary of the site has been identified as a potential commuter route for bats. Bat surveys indicate that there is no roosting occurring on the Site, and the existing commuter corridor will be retained, protected and enhanced as part of the future development of the site.

    f. There is opportunity to connect to the existing water supply and wastewater network, subject to confirmation of capacity. Similarly, stormwater can be managed through appropriate design solutions. Engineering options exist to mitigate any constraints.

g. Safe and efficient access is able to made to the Site, and the proposal provides potential for good connectivity across the land. Existing constraints in the wider transportation network will need to be addressed in order to accommodate growth in Raglan. These are able to be assessed through subsequent processes.

11. Council's reporting officer expresses her agreement that the land is suitable for residential zoning, however is concerned with the extent to which the proposed rezoning would give effect to objective 6 of the NPS-UD and objectives 3.12(c) and (d) and policy 6.3 of the WRPS. This is due to uncertainty that exists around the funding and delivery of required infrastructure to service development on the Koning land at this time. As such, she recommends that the Site be zoned "Future Urban Zone".

12. In my opinion, the evidence demonstrates the potential for the Submitter to achieve servicing of the land through various mechanisms, which provides flexibility to provide a response to the demand for housing in the Raglan market.

13. In particular, in terms of three waters infrastructure: there is certainty regarding the provision of wastewater supply, both in the interim and as part of the upgrade of the Council's WWTP planned within the next five to 10 years, and the Submitter is willing to work with Council to confirm the optimal way to connect into this network; the Submitter is willing to establish infrastructure to ensure that water supply can be achieved to service the development without creating further pressure on the existing network (noting that security of long term provision for water supply for Raglan will need to be addressed irrespective of the Koning proposal); and the ability exists to manage stormwater through the incorporation of management devices as part of the wider development of the site.

14. In terms of roading, in order to confirm the exact impact any development of the Koning land will have on the surrounding road network, and what the status of timing for upgrading of the Wainui Road Bridge is at the time of that development, it is considered appropriate that an updated Integrated Transport Assessment (ITA) be prepared at the time of applying for subdivision for that development. That ITA should address the status of the Wainui Road Bridge upgrade at that time, as well as the need for other upgrades to transport infrastructure, including the Bow Street / Norrie Avenue intersection and the SH3 / Te Pahu Road intersection.

15. In terms of potential reverse sensitivity effects, an interface control has been proposed along the boundary common with the Xtreme Zero Waste site, requiring visual screening through landscaping and setback of a residential development from the common boundary.

16. Adopting the relief sought by the Submitter is considered to be a positive planning decision that would enable the Council to better respond to high levels of growth and anticipated demand for housing in Raglan and provide greater competition and choice in the housing land market.

17. With respect to concerns raised by others regarding the need to consider the wider context and undertake a spatial plan, existing constraints in the surrounding environment dictate the ability for growth in the foreseeable future in this immediate location. In this regard, the Koning land is bounded by the WWTP to the north, the Raglan golf course to the east, Wainui Reserve and Ngarunui Beach to the west, and partially by the Xtreme Zero Waste facility to the south. These factors significantly influence the manner in which development on the Site and surrounding area can occur.

18. Provision exists within the PWDP as notified (and as proposed to be amended) to appropriately consider effects of residential subdivision on the Site, including the extent to which the proposal is consistent with the Structure Plan and the manner in which development will be serviced. This ensures that development of the Koning land can be managed through the resource consent process by 'live zoning' the land Residential, without needing to require a further plan change process.

19. By 'live zoning' the land, the WDC has the opportunity provide greater flexibility and capacity to address evident housing supply issues in Raglan, while also enabling a more competitive housing market and promoting greater choice and affordability.