

BEFORE THE WAIKATO DISTRICT COUNCIL

IN THE MATTER the Resource Management Act 1991 (“RMA”)
OF

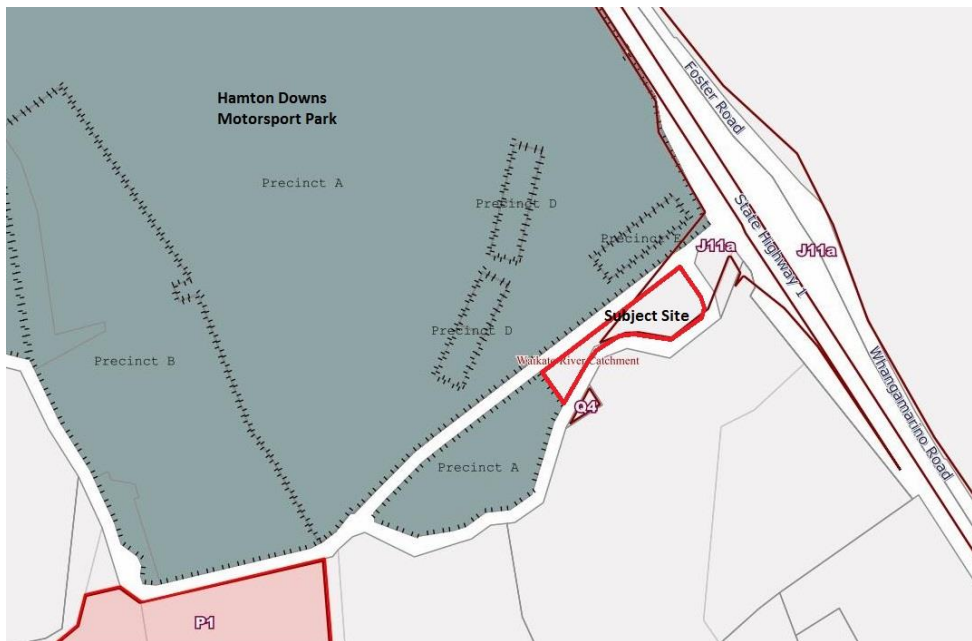
AND

IN THE MATTER Hearing 13 - Proposed Waikato District Plan Stage
OF 1 – Chapter 26, Hampton Downs Motorsport and
Recreation Zone

STATEMENT OF EVIDENCE OF ALISTAIR WYATT WHITE, PLANNER
FOR AND ON BEHALF OF REID INVESTMENT TRUST (SUBMITTER 783 AND FS1279)

26 MARCH 2020

1. My name is Alistair Wyatt White. I am the Managing Director of Planning Focus Limited, based in Auckland. I hold the qualifications of BRP (Hons) (Massey) and have been a full member of the New Zealand Planning Institute since 1993. I have twenty-six years planning experience, the last twenty-three of which have been in a consultancy capacity. I formed Planning Focus in 2004. Planning Focus is a development planning practice involved in projects throughout New Zealand, but primarily in the Auckland Region. We provide planning services to publicly-listed and private companies and individuals. Our practice is grounded in the industrial sector.
2. I confirm that I have read the Code of Conduct for Expert Witnesses 2014 contained in the Environment Court Practice Note and I agree to comply with it. My qualifications as an expert are identified above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.
3. On my instructions, a former employee of Planning Focus lodged submissions and further submissions on behalf of Reid Investment Trust concerning Chapter 26, Hampton Downs Motorsport and Recreation Zone. Reid Investment Trust own 29 Hampton Downs Road ('the site'), which is highlighted in red below. The site is legally described as Lot 6, Deposited Plan 411257, contained in Identifier 500903, and comprising 1.3587 hectares. I have visited the site, and Hampton Downs Motorsport Park, on several occasions.



3. The site was included in the 2006 resource consent (Waikato District Council Reference LUC005/06), has been earthworked and compacted, and continues to be used for car parking during large events within Precinct A of the Hampton Downs Motorsport Park. The site also contains the water supply tanks servicing the Hampton Downs Motorsport Park. This association is reflected in the Operative Waikato District Plan 2013 which includes the site in the Hampton Downs Motorsport Park subdivision schedule 25D. On Figure 25DA: Hampton Downs Motorsport Park of that plan, the site is shown as a car parking area. The Reid Investment Trust intend developing the site for light industrial purposes, such as warehousing and vehicle workshops, consistent with the existing industrial units opposite the site within Precinct E, whilst continuing to enable any undeveloped areas to be used for car parking associated with Precinct A.

4. The site is zoned Rural under the Proposed District Plan. However, this zoning does not reflect the nature and opportunity of the site and its close proximity and association with the Hampton Downs Motorsport Park. Furthermore, the long and narrow site is not of size (or dimensions) suited to productive rural purposes, and is surrounded by the Hampton Downs Motorsport Park to the west and north, and a service station to the east. Hampton Downs Road and the site essentially form a ridge. Another formed road defines the southern boundary of the site, and the Rural land to the south falls away steeply.
5. Finally, it is noted that a New Zealand Transport Agency (NZTA) designation for the Waikato Expressway exists across part of the site, and the adjoining service station. Prior to filing submissions on the Proposed District Plan I sought advice from NZTA whether the designation can now be uplifted, but I am still awaiting a response. Council have similarly requested a response from NZTA as part of Hearing 15, which is currently scheduled to commence on 20 April 2020.
6. Over recent weeks I have spoken with representatives of the owners and operators of the Hampton Downs Motorsport Park (HD Land Limited and Hampton Downs (NZ) Limited). In an overarching sense, HD Land Limited and Hampton Downs (NZ) Limited agree that the site owned by Reid Investment Trust should be more appropriately zoned (and remain available for car parking associated with Precinct A), and Reid Investment Trust agrees that HD Land Limited and Hampton Downs (NZ) Limited are best placed to provide evidence on the substantive provisions that will govern the use and development of the Hampton Downs Motorsport and Recreation Zone.
7. However, complicating matters is the fact that the hearing on the zoning of the site owned by Reid Investment Trust is not part of this hearing on the provisions of the Hampton Downs Motorsport and Recreation Zone. The zoning hearing (Hearing 25) is currently scheduled for October 2020. Whilst decisions on any re-zoning and consequential changes may well be made at that later hearing, it will be useful to the Commissioners and Submitters, at this juncture, for me to identify the relief I consider most important to address the anomaly that is the zoning of the site, and the changes to the zone provisions that will also be the subject of Hearing 25.
8. There may well not be scope to re-zone the site to Industrial. Even if there was sufficient scope, that approach would create a 'spot zone', which is not an ideal planning situation. As identified above, all that is intended are light industrial units, such as warehouses, consistent with the existing industrial units opposite the site within Precinct E, whilst also retaining the ability to use the site for parking associated with Precinct A. Working within the confines of the Hampton Downs Motorsport and Recreation Zone is considered the most appropriate planning response.
9. In that regard, there are three options, all of which are simple.
 - (i) Include the site within Precinct E – Industrial Units, with no change to any other provisions.
 - (ii) Include the site within Precinct E – Industrial Units, but delete the words 'within the Industrial units' of Activity P1, 26.1.1.5 Permitted Activities. That subtle change would then remove any ambiguity that an industrial activity is enabled in both the existing units on the northern side of Hampton Downs Road and any new building/units to be developed on the subject site.
 - (iii) Create a new precinct for the site, namely Precinct F – Industrial Units. This option would require a few consequential changes, such as an additional permitted activity table and

referenced inclusion within the development standards (Land Use Effects) and default discretionary activity rule. Parking associated with Precinct A would also be expressly enabled as a permitted activity within Precinct F.

10. Option 3 above, the creation of a separate precinct, is considered most appropriate, most notably so the site is necessarily divorced from the 'noise bucket' permitted for the operation of the wider precinct. Noise within Precinct F should instead reference the noise standards of Precincts B and C. Also, accepting the appropriateness of only accommodating clean light industrial activities within the immediate environment, any activities requiring consent for any discharges to air or water should be discretionary.
11. Traffic is not considered of anything but academic consequence because of the limited capacity of the site and the nature of land use that would be enabled. As it is most of the traffic provisions of the zone relate to activities within Precinct A. The subject site is only 1.3587 hectares, but is also elongated and of highly irregular dimensions, and contains various easements, and an overtly generous 25m setback from the Rural zone, all of which will further complicate and limit development.
12. If we assume a maximum development scenario and compliance with the 45% site coverage rule, 6,114sqm of GFA could technically be developed. Any such development will very likely only be single level (noting the 10m height limit) and include a nominal, if any, ancillary office. That total quantum would certainly not undermine the efficiency of the existing Industrial landbank within the District.
13. The recognised daily trip rate for light industrial development is 4 trips per 100sqm GFA, and the corresponding peak hour trip rate is 0.5 trips per 100sqm GFA¹. That having been said the site is somewhat dislocated so will unlikely contain regular or frequent activity. Notwithstanding, the resultant traffic numbers of full development could potentially be 245 vehicles per day and 31 in the peak hour. Those are not high traffic numbers, and I certainly expect they can be readily accommodated by the roading network, including the proximate State Highway 1 interchange. It may however be appropriate to insert a rule severely limiting traffic movements to/from Precinct F during the peak hourly movements of Major and Extreme Events within Precinct A. The site would continue to be referenced in the Traffic Management Planning for larger events occurring within Precinct A.
14. No other changes to the provisions of the Hampton Downs Motorsport and Recreation Zone are considered necessary in order to incorporate the reasonable use and development of the site, and nor would the inclusion of site within that zone otherwise restrict or manifest adverse effects on the use and development of that zone, or the environment generally.

Alistair White
26 March 2020

¹ New South Wales Roads and Traffic Authority