

BEFORE AN INDEPENDENT HEARINGS PANEL

THE PROPOSED WAIKATO DISTRICT PLAN (STAGE 1)

UNDER the Resource Management Act 1991 (the Act)

IN THE MATTER OF Hearing 13: Hampton Downs Motorsport and Recreation Zone (Proposed Waikato District Plan) submissions and further submission

**STATEMENT OF EVIDENCE FOR TANYA RUNNING FOR THE WAKA KOTAHI NZ
TRANSPORT AGENCY (PLANNING)**

DATED 19 MARCH 2020

1.0 Introduction

1.1 My name is Tanya Running. I am a Principal Environmental Consultant with WSP where I have been employed since 2004. I hold a degree in Science from Waikato University. I am an Associate member of the New Zealand Planning Institute. I have 15 years' planning experience.

1.2 I am authorised to present this evidence on behalf of Waka Kotahi New Zealand Transport Agency (the Transport Agency), in support of its primary submissions¹ and further submissions² on the Proposed Waikato District Plan (PWDP). I was not involved in the preparation of the submissions or further submissions made to the PWDP.

1.3 I confirm that I am familiar with the Code of Conduct for Expert Witnesses as set out in the Environment Court Practice Note 2014. I have read and agree to comply with the Code. Except where I state that I am relying upon the specified evidence or advice of another person, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

2.0 The Transport Agency's submissions on the Hampton Downs Motorsport and Recreation Zone

2.1 The Transport Agency lodged submissions and a further submission on Chapter 26: Hampton Downs Motorsport and Recreation Zone and a submission on Chapter 9: Specific Zones, which are addressed in this hearing.

3.0 The Section 42A report

3.1 I have reviewed the Hearing 13: Hampton Downs Motorsport and Recreation Zone, section 42A report (s42A report) and its appendices, dated 5 March 2020 and its recommendations in relation to the Transport Agency's submissions and further submission.

3.2 For clarity, **Annexure A** provides a table of the Transport Agency's submissions and further submissions, and states whether the s42A report's recommendations are agreed or disagreed with.

4.0 Scope of evidence

4.1 In preparing this evidence, I have also had regard to:

- a) The Transport Agency's submissions and further submission, and the submissions and further submissions made by other parties;
- b) The notified version of Chapter 26: Hampton Downs Motorsport and Recreation Zone dated 18 July 2018;

¹ Submission #742

² Further Submission # 1202

- c) The notified version of Chapter 9: Specific Zones dated 18 July 2018; and
- d) The evidence of Robert Swears in relation to Transportation Engineering dated 19 March 2020.

4.2 My evidence addresses the following submissions and a further submission made by the Transport Agency:

- Submission Point 742.165: Rule 26.1.2.1 C1 Controlled Activities – Operational Motorsport Area – Precinct A
- Submission Point 742.166: Rule 26.2.4 P1 and P2 Landscaping and Screening
- Submission point 742.167: Rule 26.2.6 P1, P2, P3 and D1 Motorsport and recreation events – Precincts A and C
- Submission point 742.168: Rule 26.2.7 C1, C2 and C3 Motorsport and event traffic management – all precincts
- Submission point 742.170: Rule 26.2.11 P1 and D1 Signs general - All precincts
- Submission points 742.171: Rule 26.2.12 P1 Signs - Effects on traffic - All precincts

Reid Investment Trust [submitter # 783]

4.3 The section 42A report (paragraph 397) notes that Reid Investment Trust [783.5] original submission sought to include their site (Lot 6 DP 411257) within the Hampton Downs Motorsport and Recreation Zone. This matter will be addressed in Hearing 25. Inadvertently, the Transport Agency did not lodge a further submission on the Reid Investment Trust submission and therefore their views on the proposed rezoning are unlikely to be considered as part of Hearing 25.

4.4 Because of the Transport Agency's extensive involvement in the 2006 resource consent³ that provides the management framework for the Hampton Downs Motorsport and Recreation Zone and the Transport Agency's involvement as a directly affected party for events at Hampton Downs, it is respectfully requested that the Hearings Panel allow the Transport Agency to be a party to Hearing 25.

4.5 For the Hearings Panel record, the Transport Agency's position would be to oppose the proposed re-zoning of the land on the basis that there is a lack of traffic modelling provided to ascertain the potential level of effects on the Hampton Downs SH1 interchange from the proposed rezoning.

5.0 Evidence Summary

5.1 The Transport Agency's submissions sought to retain the rules as notified as they are in general accordance with the 2006 resource consent. The overall approach of the submissions from HD Lands Limited (as owner) and Hampton Downs NZ Limited⁴ (as operator) (Hampton Downs Motorsport Park or HDMP) is to seek the removal of a number of the notified rules as they are seen as additional

³ Waikato District Council reference LUC0005/06.04

⁴ Submitter number 657

controls to the existing resource consent. I note that the s42A report opposes this approach as a general principle. Given the scale and range of activities on this site, it is important that the District Plan provides a management framework to address future proposals that will occur in addition to the current consented activities/development on this site.

5.2 The evidence of Mr Swears provides the background to the 2006 resource consent and the reasons for the conditions in relation to traffic and roading matters. The recommended amendments to the Chapter 26 Rules in Appendix 3 of the s42A report dilute a number of the resource consent conditions from the 2006 resource consent which in turn removes a layer of control for activities at Hampton Downs. This approach is opposed by the Transport Agency.

5.3 I recognise that the rules as notified are a duplicate (to a certain extent) of the 2006 resource consent conditions which enables activities at the HDMP, however, I do question the need to have both rules in a District Plan and a resource consent to control activities on a site. If there is a need for both levels of control, I consider they should be the same as each other to ensure the consent holder and other affected parties are clear what can occur on site.

5.4 Of particular concern is the deletion of the Controlled Activity Rules and replacement with new Permitted Activity Rule 26.1.1.1 P5 within the Activity-specific conditions. One of the Activity-specific conditions is the requirement for a standard Traffic Management Plan (TMP). As outlined in the evidence of Mr Swears, the type of events that occur at Hampton Downs would not be adequately managed by a standard TMP. As the new Rule provisions would place unreasonable demands on the traffic management coordinators (TMCs) for the Transport Agency and Waikato District Council who will be required to review and accept (or reject) the plans.

5.5 A review of Google Earth images (refer to Attachment A) shows that with the existing planting in place the HDMP is visible from State Highway 1 (SH1). Condition 9 of the 2006 resource consent requires: *screening around the perimeter of the site adjacent to State Highway One*. In addition, Condition 12 states that the *“shelter row planting...shall be established and maintained until the balance of mitigation planting has been undertaken, and forms an effective visual screen from State highway One”*. It is my opinion the existing planting does not form an effective visual screen from SH1 and the amendments proposed in the s42A report at paragraph 220 to the Notified landscaping and screening Rule 26.2.4 P1 and P2 may not provide adequate screening.

6.0 Submission Point 742.165: Rule 26.1.2.1 C1 Controlled Activities – Operational Motorsport Area – Precinct A

Submission point 742.167: Rule 26.2.6 P1, P2, P3 and D1 Motorsport and recreation events – Precincts A and C

Submission point 742.168: Rule 26.2.7 C1, C2 and C3 Motorsport and event traffic management – all precincts

- 6.1 The Transport Agency opposes the recommendations of the s42A report to accept in part these submission points (which sought the retention of the rules as notified) and the proposed deletion of the above rules. Notified Rule 26.2.7 C1, C2 and C3 reflect Conditions 20, 46, 48 and 50 of the 2006 resource consent. Whereas, Notified Rule 26.2.6 P1, P2, P3 and D1 reflect Conditions 17, 18 and 19 of the 2006 resource consent. Rule 26.1.2.1 C1 provides the matter that control shall be reserved.
- 6.2 The s42A report proposes to replace these rules with a new Permitted Activity Rule 26.1.1.1 P5⁵. The Activity-specific conditions to new Rule P5 relate to Condition 48 of the 2006 resource consent. New Rule P5 provides for no more than 20,000 people regardless if it is a Minor, Medium, Major or Extreme Event. Activity-specific condition clause (g) requires that the event is undertaken in accordance with a (TMP) authorised by the Transport Agency and Council's Roading Team. Clause (a) sub clauses (i) to (xiii) provides the information requirements of the TMP.
- 6.3 Condition 47 of the 2006 resource consent requires all events to have a TMP in accordance with the Traffic Management Strategies (TMSs)⁶. As outlined in Mr Swears evidence the TMSs were based on microsimulation modelling and are an important input to the TMP for HDMP. There is no reference to the TMSs in either the notified or New Activity-specific conditions of new Rule P5. I do note that the contents of Condition 47 were not included in the Notified version of the rules, and as such is outside the Transport Agency's submission scope. However, from Mr Swears evidence I consider that they are an important input and as such should be included.
- 6.4 Conditions 20 to 27 of the 2006 resource consent relate to the establishment of an Implementation Monitoring Committee (IMC). Mr Swears outlines in his evidence that the traffic management measures to which reference is made in the 2006 resource consent were to be developed based on a range of vehicle occupancy and traffic survey data along with input from the IMC. There is no reference to this requirement in the Activity-specific conditions of new Rule P5 except the s42A authors statement in paragraph 257: *I also consider that reference to IMC can be removed from C1(a)(iv)L given my recommendation to delete C3 as the rule is overly complex.*
- 6.5 Mr Swears evidence outlines the importance of the inputs to a TMP as follows:
'it is important to recognise that for temporary traffic management (particularly for the larger events) for Hampton Downs Motorsport Park to function adequately, the level of input required is beyond that ordinarily involved with preparing a traffic management plan'.
- 6.6 It is therefore my opinion, that Rule 26.1.2.1 C1 as notified should be retained; particularly in relation to the retention of the IMC which provides an important role in reviewing TMPs.

⁵ Appendix 3 of the s42A report- recommended amendments to Chapter 26

⁶ Presented in the Hampton Downs Motorsport Park Traffic Impact Assessment Report, October 2006 by Traffic Planning Consultants Ltd

7.0 Submission Point 742.166: Rule 26.2.4 P1 and P2 Landscaping and Screening

- 7.1 The Transport Agency opposes the recommendations of the s42A report to accept in part their submission and the proposed deletion of Rule 26.2.4 P1 and P2 for the reason outlined below and in the evidence of Mr Swears.
- 7.2 Conditions 8 and 9 of the 2006 resource consent requires the consent holder to undertake perimeter screening planting as detailed in the approved Landscape Plan, with the intent to provide screening around the perimeter of the site adjacent to SH1. The approved Landscape Plan as provided in Appendix 12 of the PWDP indicates shelter belt planting and boundary screen planting along the eastern boundary (adjacent to SH1) and along the northern boundary of the site which is visible from SH1.
- 7.3 As can be seen from Google Earth images in Attachment A, Figures 2, to 5 the site is visible from SH1 and in my opinion the existing planting does not form an “effective visual screen” from SH1.
- 7.4 Notified Rule 26.2.4 P1 replicates much of Condition 8 of the 2006 resource consent. The s42A report has recommended that this rule be deleted as it can be both simplified and improved. Instead a new Rule P1 requires any building or activity *that will at maturity be visible from SH1 be visually buffered* by 3m high evergreen landscaping. My concern is that 3m appears to be an arbitrary figure with no confirmation that vegetation of this height would screen a building or activity on site given its rolling topography, and the maximum building heights of 15m and 17m permitted by Notified Rule 26.3.2 P1.
- 7.5 As outlined in the evidence of Mr Swears:
In my view, it is important for activities at the Hampton Downs Motorsport Park to be obscured from the view of road users on the adjacent transport network to minimise the potential for activities at the Park to distract road users⁷.
- 7.6 It is therefore my opinion, further evidence is needed from Council to confirm that landscape screening up to 3m would visually buffer any building or activity that will at maturity be visible from SH1. This is particular important given that the existing planting required under the 2006 consent, does not form an effective visual screen.

8.0 Submission point 742.170: Rule 26.2.11 P1 and D1 Signs general - All precincts

- 8.1 Condition 16 of the 2006 resource consent relates to signage. It requires that signs *be internally facing and be screened from the State Highway by planting*. Notified Rule 26.2.11 replicates these requirements and provides setback, sign area and height limits. The s42A report rejects HDMP submission points to increase the area of signage permitted and the deletion of setbacks from SH1. The Transport Agency supports the S42A report recommendations on these matters.

⁷ Paragraph 6.4

9.0 Submission point 742.171: Rule 26.2.12 P1 Signs - Effects on traffic - All precincts

9.1 The Transport Agency have sought changes to all of the signage rules in the PWDP in relation to the number of characters, symbols, words that are permitted on a sign directed at road users. Mr Swears evidence seeks that messages on signs at the HDMP are visible only to visitors to HDMP. If this is the case then the Transport Agency's submission on this matter is not necessary. However, should the Rule 26.2.12 P1 clause (v) remain, then amendments are sought to clause.11.2.9.2. Section 5 of my evidence in the Hearing 12: Country Living Zone addressed this matter and for ease of reference for the Hearing Panel I repeat this in full below.

The Transport Agency's submission point supported this rule and sought amendments to clause (v) (insertions underlined):

"(v) Contain no more than 40 characters and no more than 6 words, symbols or graphics;"

The s42A Author rightly points out that the proposed amendments sought in this submission "complicates the situation for a plan reader" and that:

"The rule would then read to include 40 characters, and as well, 6 words, symbols and graphics. The request would be increasing the amount of information on the sign. I do not believe this is the intent of the submission. Further to this, I am unsure about the difference between the terms 'characters, symbols and graphics' from an NZTA perspective, and invite NZTA to provide some clarification. I recommend that the panel reject New Zealand Transport Agency [742.236]."

The Transport Agency has requested the same amendment for all zones in the PWDP and this was recently addressed in Hearings 6, 7, 8, 9 and 10.

In preparing my summary statement for Hearing 7, I noted that the Transport Agency's original submission to alter the wording of P1(iv) differs to that in the Transport Agency's brochure: "Advertising Signs on State Highways." The brochure wording is as follows:

"Signs should have a maximum of 6 words and/ or symbols, with a maximum of 40 characters"

The PWDP wording as notified is: Contain no more than 40 characters and no more than 6 symbols. Given the similarity of the wording in the PWDP and Transport Agency Brochure, I respectfully requested a minor amendment to the rules as follows (insertions underlined):

" Contain no more than 40 characters and no more than 6 words and/or symbols;"

However, in light of the s42A Authors' comments I consider for clarity for users of the District Plan that the wording of this rule throughout the PWDP should revert back to the wording in the Transport Agency's brochure: "Advertising Signs on State Highways" as outlined above.

ANNEXURE A

	Matter	The Transport Agency's Submission or Further Submission Number	S42A report's recommendation	The Transport Agency's Comment
1	Policy 9.1.1.3 – Management of adverse effects	S742.61	Accept in part	Accept
2	Rule 26.1.2.1 C1 – Controlled Activities – Operational Motorsport Area – Precinct A – Motor sport and recreation events	S742.165	Reject	Disagree
3	Rule 26.2.4 P1 and P2 – Landscaping and Screening	S742.166	Accept in part	Disagree
4	Rule 26.2.6 P1, P2, P3 and D1– Motor sport and recreation events – Precincts A and C	S742.167	Accept in part	Disagree
5	Rule 26.2.7 C1 – Motor sport and event traffic management – all precincts	S742.168	Accept in part	Disagree
6	Rule 26.2.10 – Glare and artificial light spill	S742.169	Accept in part	Agree
7	Rule 26.2.11 P1 and D1 – Signs general - All precincts	S742.170	Accept in part	Disagree
8	Rule 26.2.12 P1 Signs - Effects on traffic - All precincts	S742.171	Reject	Disagree
9	Rule 26.2.12 D1 Signs - Effects on traffic - All precincts	S742.171	Accept	Agree
10	Rule 26.3.5 P1 and D1– Building setbacks – All precincts	S742.173	Accept	Agree