



Fast Track Referral Application Planning Memo

JOB NUMBER: 23-1883

WAIKATO THOROUGHBRED GREENFIELD RACING HUB

PROJECT

WAIKATO THOROUGHBRED RACING INCORPORATED

CLIENT

REVISION TYPE - REV 1

17 April 2026



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Fast Track Referral Application



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1 INTRODUCTION AND SCOPE

This Planning Memorandum has been prepared to support a Fast Track Referral Application lodged on behalf of Waikato Thoroughbred Racing Incorporated (the Applicant) for the proposed Waikato Thoroughbred Racing Greenfield Racing Hub (WTR Greenfield Hub).

The project seeks to establish a unique, world-class greenfield racing hub for horse training, racing and associated equine activities. It will bring together the expertise, capability and heritage of the Waikato racing community in a single, purpose-built location.

The WTR Greenfield Hub will create a more streamlined, competitive, sustainable and future-focused racing industry for the region. It will also strengthen New Zealand's position as a premier racing destination, attract potential international investment and enhance tourism opportunities across the wider Waikato.

This is a project of significant regional benefit estimated to add almost \$200m GDP for the Waikato – including direct expenditure of over \$400m over the eight-year development period.

A key driver for the project is the consolidation of four existing racecourse facilities: Te Rapa, Waipā and Cambridge thoroughbred racecourses and the Cambridge harness track operated by Waikato-Bay of Plenty Harness.

These facilities currently duplicate infrastructure and resources and require significant investment to meet modern racing standards and customer expectations. Consolidating them into a single fit-for-purpose hub will improve operational efficiency, enhance the racing experience and support the long-term sustainability of the industry.

The retirement of the existing urban racecourse sites will also unlock significant areas of land for future development, including housing, helping to support growth and meet demand in established urban areas.

To support the project's financial viability and ensure the site remains vibrant and sustainable over the long term, the proposal also includes a range of complementary activities across the balance of the site. These include equine support services, rural residential housing, a retirement living community, a village centre and a bloodstock sales precinct.

Together, these elements will create a high-quality, multi-use precinct that supports racing, recreation, business and community life.

It should also be noted, there are no significant issues identified with the Hub proceeding.

2 SUBJECT SITE AND APPLICANT DETAILS

2.1 Location and description of the site

The following summarises the details of the applicant and the property for which the consent is required.

Applicant:	Waikato Thoroughbred Racing Incorporated
Registered Owners:	Rosalie Constance Duncan, Finn and Partners Trustees Limited [RTs 632409, 65020 and 650204] Robert Neville Duncan, Rosalie Constance Duncan [RT 632392] Evelyn Frances Montgomerie, NB Lawyers Trustees 34 Limited [RT 1027516 and SA383/181]
Legal Descriptions:	Section 49 SO 457609 [RT: 632409] Lot 1 DP 471383 [RT 650205] Lot 2 DP 471383 [RT 650204]

Section 2 SO 547526 [RT 1027516]

Lot 2 DP 16925 [RT SA383/181]

Section 46 SO 457609 [RT 632392] (Potentially included)

Site Area:

RT 632409: 37.6439ha

RT 650205: 23.8694ha

RT 650204: 18.5194ha

RT 1027516: 69.6678ha

RT SA 383/181: 14.212ha

RT 632392: 1.355ha (Potentially included)

Overall Site Area: 163.9109ha (165.5ha if 644 Pencarrow Road is included)

Street Addresses:

536 Pencarrow Road, Tamahere, Hamilton [RT 650204]

592 Pencarrow Road, Tamahere, Hamilton [RT 650205]

636 Pencarrow Road, Tamahere, Hamilton [RT 632409]

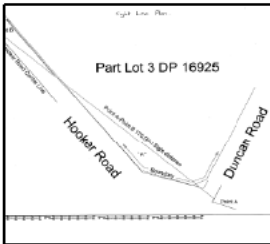
37 Hooker Road and 38 Duncan Road, Tamahere, Hamilton [RT 1027516]

90 Duncan Road, Tamahere, Hamilton [RT SA383/181]

644 Pencarrow Road, Tamahere, Hamilton [RT 632392] (Potentially included)

2.2 Records of Title and legal interests

The subject Records of Title and registered legal interests are identified in the below table:

#	Title Details and Address	Area	Owner	Interests
1	Section 49 SO Plan 457609 (RT 632409) – 636 Pencarrow Road	37.6439ha	Robert & Rosalie Duncan, Fin & Partners Trustees Limited	S316513 Gazette Notice declaring No.1 SH (Awanui-Bluff) fronting the within land to be a limited access road – 1965.
2	Lot 1 DP 471383 (RT 650205) – 592 Pencarrow Road	23.8694ha	Robert & Rosalie Duncan, Fin & Partners Trustees Limited	S316513 Gazette Notice declaring No.1 SH (Awanui-Bluff) fronting the within land to be a limited access road – 1965.
3	Lot 2 DP 471383 (RT 650204) – 536 Pencarrow Road	18.5194ha	Robert & Rosalie Duncan, Fin & Partners Trustees Limited	Nil
4	Section 2 SO 547526 (RT 1027516) – 38 Duncan Road and 37 Hooker Road	69.6678ha	Evelyn & James Montgomerie, Mackrell Murcott Trustees 2011 Limited	8700791.1 Covenant pursuant to s108(2)(d) RMA 1991 (affects part formerly Lot 3 DP 404891); pertaining to a height restriction within Area A shown below. 
5	Lot 2 DP 16925 (RT SA383/181) – 90 Duncan Road	14.2121ha	Carolyn Smith, Robert & Wendy Wait, Simon Makgill	Nil
6	Section 46 SO 457609 – (RT 632392) – 644 Pencarrow Road	1.3557ha	Robert Neville Duncan, Rosalie Constance Duncan	S316513 Gazette Notice declaring No.1 SH (Awanui-Bluff) fronting the within land to be a limited access road – 1965.

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Table 1: Record of Title details and overview of relevant interests.

The land covenant registered against RT SA13A/150 relates to a height restriction of 0.2m for any structures or vegetation within area 'A' on the sight line plan (other than a seven-wire fence), to preserve the sight distance of 170m at the intersection of Hooker and Duncan Roads. The implications of this sight line covenant will be addressed during the design phase for the Substantive Application.

Copies of the Records of Title and legal interests are attached as **Appendix A**.

3 PROPOSAL

3.1 Project background

The Waikato region has long been recognised as one of New Zealand's leading centres for thoroughbred breeding, training and racing. It is home to many of the country's premier studs and trainers and has produced some of New Zealand's finest racehorses and bloodstock. In doing so, the region has played a defining role in shaping both the national racing industry and New Zealand's international reputation in racing and bloodstock.

Waikato Thoroughbred Racing (WTR) currently operates three sites: Te Rapa Racecourse (training and racing), Waipa Racecourse (training only) and Cambridge Jockey Club (training and racing on a synthetic track). The Cambridge facility is one of the largest thoroughbred training complexes in Australasia.

The Waikato racing industry continues to play a significant role in the wider New Zealand economy. It supports a substantial network of breeders, trainers, jockeys and stable staff, while also sustaining a broad range of related industries including: veterinary services, farriers, transport providers and event-related businesses.

According to the 2024 New Zealand Racing Industry Report prepared by IER Pty Ltd, the Waikato hosted 120 TAB race meetings during the 2022–23 season - around 25 per cent of all North Island meetings. During that period the region contributed \$505.3 million in value-added GDP representing 27 per cent of the national racing industry's total contribution of \$1.88 billion.

This economic contribution is driven largely by direct spending on breeding, training and racing activities.

The region is also a major contributor to New Zealand's bloodstock sector underpinned by well-established equine infrastructure that supports employment, export earnings and long-term industry resilience. For example, approximately 3,810 full-time equivalent jobs in the Waikato and a wider network of more than 6,000 people are involved across the sector.

The Messara Report (2018) which was commissioned as an independent review into the condition of the New Zealand racing industry identified that many of New Zealand's thoroughbred racing facilities were in poor condition and would require significant investment to remain fit for purpose over the long term. The Hub responds directly to those challenges by providing modern, consolidated infrastructure designed to support the future of the industry.

The below excerpts are in relation to the Cambridge, Te Rapa and Waipa (Te Awamutu) facilities.

"Cambridge - Reduce the number of existing thoroughbred racing venues in New Zealand over the next 6 years by 20, from 48 to 28 venues, and establish Cambridge as a new synthetic track racing and training venue within 1 year, so making a total of 29 venues. Sell all freehold racecourse land of the closed venues with the proceeds to accrue to NZTR. Maintain racecourses in all regions of New Zealand where racing is currently conducted. Not require any Race Clubs to close but encourage them to race at another venue or merge with another Club"

"Te Rapa – Venue with 19 race meetings in 2017/18. Excellent location. Training. Average infrastructure. Would require significant improvements to racing and facilities infrastructure if retained long term but we propose that the Waikato Greenfields venue will be built and Te Rapa closed in 2026/27".

Te Awamutu – Venue with 7 race meetings in 2017/18. Good location. Training. Poor infrastructure. Requires some improvements to racing and facilities infrastructure if it is to retained long term but we propose that the Waikato Greenfields venue be built and Te Awamutu closed in 2026/27".

Since the publishing of the Messara Report, a synthetic track has been constructed and is operational at the Cambridge site in accordance with the recommendations of the above-mentioned report.

A key recommendation of the report is to *“Build an exceptional new racing and training venue in the Waikato within the next 8 to 10 years at an estimated cost of at least \$110 million and then close and sell the Te Rapa, Cambridge and Te Awamutu racecourses to fund the development. There would then be 27 thoroughbred venues racing in New Zealand.*

Project Stamina

Project Stamina was commissioned in 2025 as a joint initiative between New Zealand Thoroughbred Racing, Harness Racing New Zealand and TAB New Zealand to shift the racing industry from reactive maintenance of ageing facilities to long-term, strategic investment.

Its purpose is to develop a unified master plan for the future of racing infrastructure across both codes.

Historically, infrastructure investment across thoroughbred and harness racing has been fragmented and largely responsive to short-term needs. Project Stamina provides an opportunity to take a more coordinated and future-focused approach with benefits including the following.

- National efficiency through shared-use hubs and regional centres of excellence that reduce duplication and improve access.
- Smarter capital allocation through a coordinated long-term investment strategy.
- Improved funding outcomes by strengthening the case for public and co-investment.
- Futureproofing through greater climate resilience, biosecurity preparedness, and digital capability.
- Sustainability through environmentally responsible design and construction.

The proposed WTR Greenfield Hub is aligned with these objectives.

If approved, it would consolidate the existing thoroughbred facilities at Te Rapa Racecourse, Cambridge Jockey Club, and Waipa Racecourse, together with the Cambridge harness track into a single state-of-the-art facility.

As outlined in the provided Economic Impact Assessment (**Appendix B**) the Waikato is a nationally significant centre for thoroughbred breeding and training. Establishing a modern racing hub in the region will strengthen this existing cluster by bringing together expertise, infrastructure and industry participants in one location. This consolidation will improve efficiency, lift industry competitiveness and enhance the region’s ability to attract participants, events and investment from across New Zealand and internationally.

The current racing facilities in the Waikato are dispersed, ageing and increasingly costly to maintain. Consolidating these operations will reduce duplication in maintenance and capital expenditure and support greater productivity across racing, training, broadcasting and event delivery.

In summary, the proposal includes horse racing activities and events as well as training tracks and facilities and associated ancillary activities, including but not limited to trainers’ facilities, bloodstock offices, sales and buildings.

Importantly, this Hub also creates wider community benefits.

It will enable new amenities and shared-use opportunities within the Hub itself, while unlocking land currently occupied by existing racecourses for future urban development - including housing and commercial use.

Other land uses include lifestyle residential sections, retirement living development, equestrian activities, commercial activities, carparking, access (and all associated transport infrastructure), commercial equine support services, landscaping and vegetation planting/maintenance. The proposal includes all buildings, activities, subdivision, infrastructure and earthworks associated with these elements.

Overall, the Hub represents a significant opportunity for the Waikato to invest in infrastructure that delivers long-term benefits for both the racing industry and the wider community. It will create a modern facility that reflects contemporary standards, meets community expectations and supports a vibrant, sustainable future for racing in the region.

3.2 Proposal description and proposed activities (s13(4)(a))

The proposed WTR Greenfield Racing Hub and associated development will contain the following activities, which are described in further detail in Section 3.2.1 below.

Thoroughbred racing and associated activities

- Thoroughbred racing facility including a main track with 1200m starting chute
- Race day and industry functions and events (up to 60 race and trial meetings per year)
- 1400m thoroughbred training track
- 500m warmup track
- Trainers' allotments – on-site stables and yards
- Bloodstock office and sales business - barns, yarding, sales pavilion, administration
- Operations and events building with parade ring and tie ups

Harness racing

- 1000m Harness racing and training track
- Trainer's allotments – on site stables and yards
- Raceday and industry functions and events (up to 50 race and trial meetings per year)

Other land uses

- Comprehensive retirement living
- Lifestyle residential sections
- Equestrian events ring
- Provision to host certain temporary events (e.g. corporate events, park and rides for field days)
- Village centre (bar / café / other small scale commercial activities)
- Three parking areas for up to 2,030 vehicles
- Commercial equine support services – veterinarians, farriers etc
- Rehabilitation of the existing Kahikatea stand within the site
- All associated infrastructure and earthworks on and off site.

Subdivision

It is proposed to divide the site into a series of smaller titles. This will ensure the activities above can be separated onto individual Titles. A final layout for these will be determined prior to the substantive application stage.

The indicative site layout and applicable areas are demonstrated in the development masterplan prepared by architects Design Group Stapleton Elliot (DGSE) and Cox, which are attached to the application as **Appendix C** and are shown in **Figure 1** below:



Figure 1: Indicative Development Site Plan.

Project benefits summary

We believe the Hub supports the delivery of a development and infrastructure project that will provide significant regional benefits, including but not limited to the following.

- Supporting growth in the Waikato through the creation of a high-quality development that strengthens community connections, supports a thriving commercial economy and responds to the needs of a growing population.
- Enhancing the natural environment through a design approach that integrates green space throughout the site, including retention of the existing Kahikatea stand, additional planting and high-quality landscape and boundary treatments.
- Embedding cultural values through ongoing engagement with Mana Whenua, including cultural design input and the incorporation of appropriate cultural protocols.
- Generating a broad range of economic benefits, including supporting a regionally significant industry and indirectly increasing housing supply to help meet growing demand in existing urban centres.
- Replacing the existing thoroughbred racing facilities at Te Rapa racecourse, Cambridge racecourse and Waipa racecourse, along with the Cambridge harness raceway, with a single 'state-of-the-art' Hub that reduces duplication of ageing infrastructure, improves operational efficiency and creates a long-term regional asset supporting employment and economic activity, tourism and events.
- Increasing housing supply in Cambridge and Te Awamutu through the retirement of the existing thoroughbred and harness racing facilities which are already zoned for medium-density residential development. The proposal will also unlock additional urban land in Hamilton by enabling the future redevelopment of the Te Rapa Racecourse site for industrial, commercial and residential uses.

Overall, the Hub will deliver enduring benefits across housing, land use efficiency, environmental outcomes, cultural values, and regional economic development.

3.2.1 Proposed activities and associated areas

The activities proposed to occur within the Hub, and their associated areas are discussed in detail in the below sections.

3.2.1.1 Thoroughbred racing facility

Raceday operations

Number of meetings (per year)

Waikato Thoroughbred Racing (WTR) currently host approximately 33 meetings per year, with approximately 26 of these being small scale meetings, six being of a medium scale and one being a large-scale event.

The large-scale event is the upper limit in regard to the number of attendees and staff / contractors.

Number of persons

The number of persons attending a WTR thoroughbred race meet has been provided in **Table 2** below based off spectator numbers from the 2024/25 season:

1. RACEDAYS				
	Large	Medium	Small	Total
Number of meetings	1	6	26	33
Spectators Range	6,000	1700-3000	750-1500	
SPECTATORS AVERAGE	6,000	2,125	932	
Raceday - Non Spectators				
Trainers	40	40	40	
Jockeys	40	35	30	
Stable Hands	80	70	60	
Ambulance / Vet	4	4	4	
Stewards / Judges	10	9	8	
Commentators / Sound	3	3	3	
TAB / Trackside	20	20	20	
Raceday - Office	10	9	8	
Raceday Food and Beverage	50	40	30	
Kitchen	25	20	15	
Tote Staff	8	6	4	
Raceday Grounds Staff / Tickets	20	18	16	
Security	20	16	12	
RACEDAY TOTAL - NON SPECTATORS	330	290	250	
RACEDAY TOTAL - AVERAGE	6,330	2,415	1,182	

Table 2: Raceday meeting attendance numbers (staff and spectators) (Source WTR).

In summary, the total approximate number of persons (including both staff and spectators) attending any one meet is 1,182 persons per small meeting, 2,415 per medium scale meeting and 6,330 per large scale meeting, which only occurs once a season.

Race meet timing

The first people associated with the race meeting will arrive on site at approximately 10am, with the first race starting at approximately 12:30pm.

During the summer racing season, the last race of a meet will finish at approximately 5:30pm.

The last person usually leaves the site around 10:30pm.

Trials

There are approximately 12 trial meetings held per year, which are used by owners and trainers to judge a horse's ability in a race like environment. Spectator attendance at these events is limited, with spectators usually limited to owners and trainers.

Number of persons

The average number of persons attending a thoroughbred trial meet has been provided in **Table 3** below:

2. TRIALS	
	No.
Number of trials	12
Spectators Range	25-75
SPECTATORS - AVERAGE	50
TRIALS - NON SPECTATORS	
Trainers	40
Jockeys	30
Stable Hands	60
Ambulance / Vet	4
Stewards / Judges	8
Commentators / Sound	3
TAB / Trackside	-
Raceday - Office	4
Raceday Food and Beverage	-
Kitchen	-
Tote Staff	-
Raceday Grounds Staff / Tickets	-
Security	-
TRIAL TOTAL - NON SPECTATORS	100
TRIAL TOTAL - AVERAGE	150

Table 3: Trial meeting attendance numbers (staff and spectators) (Source WTR).

In summary, the total approximate number of persons (including both staff and spectators) attending any one trial meet is on average 150 per trial.

Trial meet timing

The first people associated with the race meeting will arrive on site at approximately 9am, with the first race starting at approximately 10:30pm.

During the summer racing season, the last race of a trial will finish at approximately 1:30pm.

The last people on site generally leave the site around 3:30pm.

3.2.1.2 Thoroughbred training facility

A 1400m back track and 500m warm up track are proposed for thoroughbred training purposes within the northern section of the site. Approximately 16 stable buildings with an indicative gross floor area of 100,000m² (10ha) are proposed on-site. This area is proposed to stable approximately 600 horses on-site for training. The training facility will also include a pool and individual walkers for each stable. Training occurs Monday to Sunday.

Thoroughbred training operations

Number of persons and horses on-site

The number of persons attending the site for training purposes has been provided in **Table 4** below:

2. TRAINING PEOPLE AND HORSES - PER DAY			
	WEEKDAY	SATURDAY	SUNDAY
	No.	No.	No.
TRAINING - PEOPLE			
Trainers	50	40	20
Jockeys and Stable Hands	200	150	60
Training - People Total	250	190	80
TRAINING - HORSES 2035			
Horses stabled on site initially	600	600	600
Horses floated in each day (30-40 floats)	150	50	-
Training - Horses Total	750	650	600
TRAINING - HORSES 2045			
Horses stabled on site final	800	800	800
Horses floated in each day (30-40 floats)	100	30	-
Training - Horses Total	900	830	800

Table 4: Predicted thoroughbred training numbers for 2035 and intended numbers for Post 2045 (Source WTR).

This results in an approximate daily attendance of 250 people, Monday to Friday. Approximate people on-site during Saturday operations is approximately 190, with 80 people anticipated on a Sunday.

Initially 600 horses are proposed to be stabled on-site for training, with approximately 150 horses being transported to the site Monday to Friday for training post 2035. Approximately 50 horses will be transported to the site on a Saturday for training purposes, with none being transported to site on a Sunday.

Long term from 2045, it is intended to stable 800 horses on-site Monday to Sunday, with 100 horses being transported to the site Monday to Friday. Approximately 30 horses will be transported to the site on a Saturday for training purposes, with none being transported to site on a Sunday.

Training timing

The approximate arrival of people for training Monday to Friday is 4:00am, with training beginning at approximately 4:30am. Training wraps up around 10:30am with the last person leaving at 11am.

On a Saturday, staff arrival to the site is around 4:00am, with training beginning at approximately 4:30am. Training wraps up around 9:30am with the last person leaving at 10am.

Sundays operate under reduced hours, with staff arrival around 6:30am, training commencing at 7am and concluding at 8am. Final departure from the site is at approximately 8:30am.

Other activities include night feeding and walking of horses stabled on-site, which will occur between 3:00pm to 6:00pm and involves approximately 40 staff.

Track lighting

Two lighting systems are proposed for the thoroughbred training operations, which are outlined below and detailed in the lighting memorandum attached as **Appendix D**. Lighting is measured in Lux, which is a measure of how bright light is on a specific surface.

Training lighting – Main track

The lighting system for the training track within the main thoroughbred track is proposed to consist of 48 floodlights on eight 30m masts and have an illuminance of 20 lux at track level.

Training lighting – Back track

For the training backtrack, this lighting system is proposed to consist of six 25m high masts located within the infield of the backtrack. The approximate floodlight quantity for this system is 24, with an illuminance at track level of 20 lux.

3.2.1.3 Harness racing facility

A 1,000m harness raceway is proposed within the south-western corner of the site. This track will replace the existing harness raceway located on the outskirts of Cambridge

As part of this facility, this will also include on-site harness trainer allotments and yards for both race day stabling and on-site training purposes.

Raceday and training operations are broken down in detail below:

Raceday operations

Number of meetings (per year)

Waikato - Bay of Plenty Harness Racing currently host approximately 50 meetings per year, with approximately 40 of these being small scale meetings, eight being of a medium scale and two being large scale.

The large-scale events are the upper limit in regard to the number of attendees and staff / contractors.

Number of persons

The general number of persons attending a harness race meet has been provided in **Table 5** below:

1. RACEDAYS	Large	Medium	Small	Total
Number of meetings	2	8	40	50
Spectators	3,000	500	250	
SPECTATORS AVERAGE	3,000	500	250	
Raceday - Non Spectators				
Trainers	40	40	40	
Drivers	30	30	30	
Stable Hands	40	35	30	
Raceday - Office	8	7	6	
Raceday Food and Beverage	15	13	10	
Raceday Grounds Staff	20	18	16	
Security	4	3	2	
RACE TOTAL - NON SPECTATORS	157	146	134	
RACEDAY TOTAL - AVERAGE	3,157	645	384	

Table 5: Harness race meeting attendee numbers (staff and spectators) (Source Waikato-Bay of Plenty Harness Racing).

In summary, the total approximate number of persons attending any one meet is 384 persons per small meeting, 645 per medium scale meeting and 3,157 per large scale meeting.

Race meet timing

The first people associated with the race meeting will arrive on site at approximately 3:00pm, with the first race starting at approximately 5:30pm. However, this is subject to change depending on the TAB schedule.

During the summer racing season, the last race of a meet occurs around 9:30pm. During the winter, this changes to 8:30pm.

The last people usually leave the site around 10:30pm year-round.

Harness training operations

Training facilities are proposed as part of the wider harness racing operation. This occurs six days a week, Monday to Saturday.

Number of persons and horses on-site

The number of persons attending the site for training purposes has been provided in **Table 6** below:

2. TRAINING (MONDAY TO SATURDAY)	
	No.
TRAINING - PEOPLE	
Trainers	20
Drivers and Stable Hands	30
Stable Hands	40
TRAINING - PEOPLE TOTAL	90
TRAINING - HORSES	
Horses stabled on site	200
Horses floated in each day	5
TRAINING - HORSES TOTAL	205

Table 6: Harness training attendee and horse numbers (Source Waikato-Bay of Plenty Harness Racing).

This results in an approximate daily attendance of 90 people, Monday to Friday. Approximately 200 horses are proposed to be stabled on-site for training, with approximately five horses being transported to the site each day for training.

Training timing

The approximate arrival of people for training during the summer months is 5:00am, with training beginning at approximately 5:30am. During the winter, training will start at approximately 6:00am. Training wraps up around 10:30am with the last person leaving at 11am.

Other activities include night feeding and walking of horses stabled on-site, which will occur between 3:00pm to 5:00pm.

Track lighting

Two lighting systems are proposed for racing and training, which are outlined below, and detailed in the lighting memorandum attached as **Appendix D**.

Racing lighting

The lighting system proposed for racing consists of 20 18m high masts infield, and eight 24m high masts along the front straight. These masts will hold an approximate total of 200 floodlights, which are all dimmable.

This lighting system has an illuminance level of 1,000 lux at track level, 1,200 lux towards the ctv camera and 2,000 lux at the finish line.

Training lighting

The lighting system for training is proposed to consist of 14 floodlights that are located on the main harness track masts and have an illuminance of 40 lux at track level.

3.2.1.4 Race day events and facilities

A central race day events and facilities precinct is proposed between the thoroughbred racing and harness racing tracks. The building has been designed to be able to be used for both thoroughbred and harness racing to avoid the duplication of facilities and is depicted in the masterplan documentation attached as **Appendix C** and shown in **Figures 2** and **3** below.



Figure 2: Operations Building Render.

This is proposed to consist of a 2,041m² operations building, which will contain the jockey lounge, weigh rooms and changing facilities for jockeys as well as a judge's tower. This structure will be predominantly single storey, with the exception of the 93m² judges tower, which will form the second storey.

This building will also contain office and reception space, as well as a kitchen, bar areas and five function spaces, along with a terrace area oriented towards the thoroughbred racing track.

The operations building will be used for a wide range of functions / events, meetings and gatherings associated with the racing industry. When not in use for activities and events associated with racing, it will also be available for hire for corporate functions and other public events.

The race day facilities also include a 150 bay tie up facility and parade ring located to the north of the operations building. This facility will be used by both thoroughbred and harness racing.

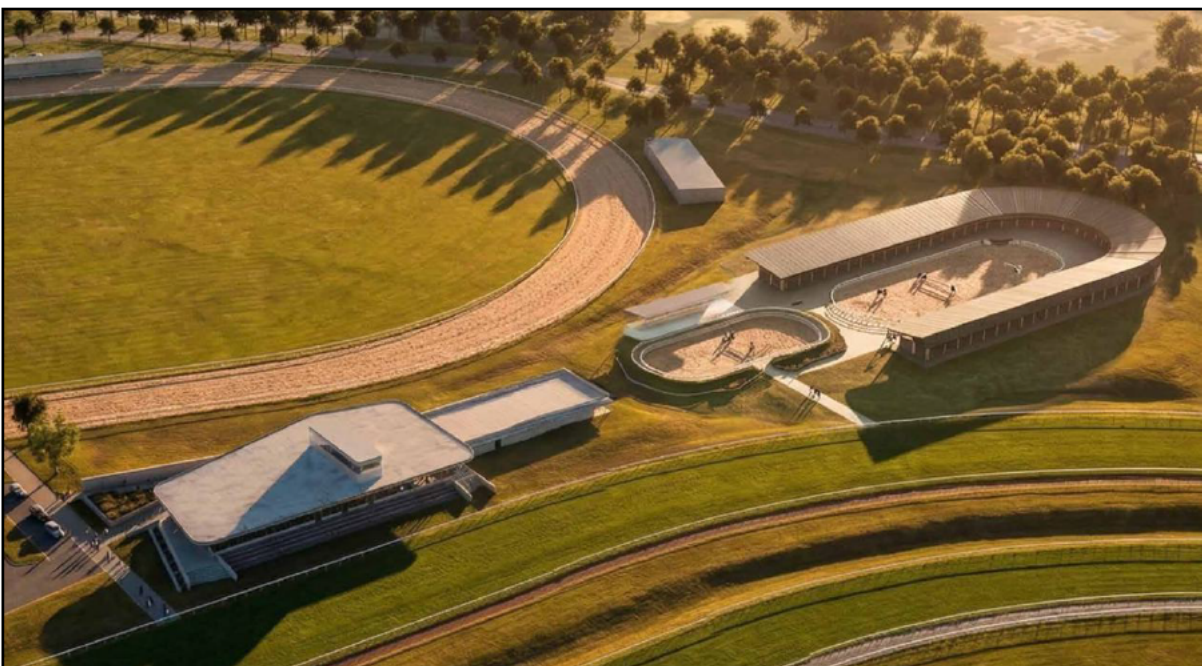


Figure 3: Race Day Facilities Render.

3.2.1.5 Village centre

The 'village centre' area is proposed to encompass 15,000m² (1.5ha) of land and will include commercial activities that will cater for on-site users and the surrounding community.

This area will include bars, retail, restaurants and cafes and will be subject to approval pursuant to section 4.1.1 below. These buildings will be upto two storeys.

Indicative renders of this area have been included in the masterplan documentation attached as **Appendix C** and shown in **Figure 4** below:



Figure 4: Village centre render.

3.2.1.6 Bloodstock operation

As outlined in Section 3.1 above, the Waikato's significant contribution to the bloodstock industry in New Zealand make the inclusion of a sales operation in this proposal a logical outcome. The proposed development of a new bloodstock sales yard in Waikato will be an important investment in enabling infrastructure that supports the continued growth and resilience of a high-value export industry

This facility would include an administration office, 1,500m² sales pavilion and stable blocks and is proposed to cover approximately 63,200m² (6.32ha) of the site, and a gross floor area of approximately 20,000m² (2ha). These buildings are proposed to be single storey in height, with the exception of the sales pavilion, which will be two storeys.

With regard to the indicative frequency of use of this area, for reference, in person sales currently occur at the current Karaka bloodstock complex three times a year with one sale in January (four days), one in June (one day) and one sale in November (two days).

3.2.1.7 Rural residential development

To ensure liveability in proximity to the development, it is proposed to develop a lifestyle section precinct in the 153,600m² (15.36ha) of balance land in the south-eastern corner of the site.

This is proposed to consist of 40 to 50, 2,500m² (0.25ha) Lots which will be serviced via on-site measures for water supply (likely via roof collection), stormwater and wastewater.

Access to these Lots is proposed to be via a loop road from Duncan Road as demonstrated on sheet 1 of the provided masterplan documents which will be formed to local road standards in accordance with the Regional Infrastructure Technical Specifications (RITS).

3.2.1.8 Commercial equine services

This area of the site is proposed to be dedicated to commercial equine services and will be located over an area of 26,500m² (2.6ha) with an indicative gross floor area of 18,000m² (1.8ha). A maximum of two storeys is proposed.

This area will include farriers, veterinarians, feed stores and will be subject to approval pursuant to section 4.1.1 below.

3.2.1.9 Retirement residential development

As indicated on the site masterplan, approximately 68,000m² (6.8ha) of the site is proposed to be used for a comprehensive retirement residential development.

This is proposed to contain around 70-80 single storey villas, 200 attached units and a two storey, 500m² community centre.

The gross floor area of this development will be approximately 100m² per villa (total 7,000m²) and 50m² per attached unit across four storeys (total 10,000m²).

3.2.1.10 Carparking

Three carpark areas are proposed within the site. These three areas have sufficient capacity to accommodate vehicles for the premier race days for both thoroughbred and harness racing.

- **Carpark 1:** Capacity of 1,200 vehicles
- **Carpark 2:** Capacity of 350 vehicles
- **Carpark 3:** Capacity of 480 vehicles

These parking areas will also provide additional parking for other activities within the site.

3.2.1.11 Site access

The site is surrounded on three sides by Pencarrow, Hooker and Duncan Roads, which are all local roads in the Waikato District Council roading hierarchy.

A 'ceremonial' entrance from Hooker Road will be the main vehicle access to the site for race day events and the village centre. This entrance will also provide access to the harness raceway and training facility.

Secondary vehicle access to the site for race day and event traffic is proposed via a vehicle entrance at the northern end of Pencarrow Road.

An secondary entrance is proposed from Duncan Road, which will provide direct vehicle access to the thoroughbred training complex.

The rural residential development will likely be served via an internal road off Duncan Road as indicated in the masterplan for the site.

The comprehensive retirement living precinct will be accessed from Hooker Road via a road internal to the development.

All site accesses are anticipated to support two-way traffic movements into and from the Hub. The intended arrangement includes the main ceremonial access from Hooker Road to primarily accommodate all general site

user and visitor movements, while the accesses from Pencarrow and Hooker Road from will support alternative entry movements for trainers and some site personnel.

The site accesses and entranceways are expected to include fully formed and sealed carriageways, while some internal areas associated with the movement of horses may be informal (unsealed). Detailed design is required at the substantive stage to confirm the level of upgrades required.

As mentioned in section 4.5.1 below, WTR is considering acquiring the property at 644 Pencarrow Road as part of the project, to optimise layout and better manage transport. However, acquiring this property is not essential to delivering the project.

3.2.2 Infrastructure

Water supply

As detailed in the Civil Assessment Report attached as **Appendix E**, the proposed development will be serviced for water supply via on-site means consisting of an on-site bore supplemented by roof and other surface water collection.

The proposed development is estimated to require 589m³ of water supply daily to service the various activities proposed within the site.

Engagement with Waikato Regional Council (WRC) confirmed that there is sufficient supply within the local aquifer (Hamilton Basin – South) and additional bore testing will be undertaken prior to submission of the substantive application to confirm water quality and flow rates.

Wastewater

As detailed in the Civil Assessment Report attached as **Appendix E**, there is no Council reticulation within the general area of the site.

On that basis, wastewater management on site would likely be managed by on-site treatment and disposal to land.

Treatment requirements would be a minimum secondary and discharged to land via disposal beds. A system of this scale would likely be a proprietary device with a high level of treatment (tertiary) and a land discharge rate of 50mm/day with an estimated land area for disposal to be 8,000m² (0.8ha) (the same area would be required for reserve).

The land area required for disposal is subject to occupancy, estimated usage and soil type.

- A system of this scale would need to consider groundwater, soil type and type of wastewater being treated.
- At minimum, the system would need to have compliant separation from any stream/drain.
- Dose loading with buffer tanks is a possible option and likely suggested given the high peak flows, and lower sustained flows.
- Porta loos, temporary systems would also be used to cater for additional flows during peak events.
- Pumping likely will be required, and therefore an allowance for a pump station has been provided.

The system would be designed for a peak event but would be designed to dose load the land over a specific time period to account for the infrequent high peak flows.

Wastewater of these volumes discharging to land would require early engagement with WRC at the substantive stage and technical reports supporting the suitability of land to receive this volume relating to ground and groundwater.

Stormwater

As detailed in the Civil Assessment Report attached as **Appendix E**, the proposed development will manage stormwater via on-site means.

Stormwater management on the site will be managed by the following:

- Surface water to be collected by downpipes and catchpits.
- Stormwater to be conveyed largely by swales, with the occasional below ground pipe and manhole.
- Stormwater would require stormwater treatment which would be achieved using swales, raingardens and/or ponds/wetlands.

The development will harvest and store all possible rainwater, while retaining hydraulic neutrality.

Swales will be used to convey and store stormwater for both 10-year & 100-year events.

4 INFORMATION REQUIRED IN AN REFERRAL APPLICATION

4.1 Proposed approvals being requested (s13(2)(d))

This application seeks resource consent approvals under the Operative in Part Waikato District Plan ("OIPWDP") and the Waikato Regional Plan ("WRP") for the reasons outlined in the sections below.

Other approvals

National Environmental Standards for Assessing and Managing Contaminants in Soil (NES-CS)

As part of the Preliminary Site Investigation (PSI) (attached as **Appendix F**), several HAIL (Hazardous Activities and Industries List) activities were identified on the site which are identified below:

- Agrichemical storage and use at the Site – HAIL A1 – Agrichemicals
- Fuel storage at the Site – HAIL A17 – Storage tanks or drums for fuel, chemicals or liquid wastes
- Treated timber pile storage – HAIL
- Presence of a farm dump and offal pits – HAIL G3 – Landfill sites
- Burn pile – HAIL I - Any other land that has been subject to the intentional or accidental release of a hazardous substance in sufficient quantity that it could be a risk to human health or the environment

It has been identified that the areas of the site currently in pasture are at or below background concentrations for copper, lead, mercury, nickel and zinc. Arsenic levels exceeded the residential health criteria in one testing location.

A **Discretionary Activity** Consent is required under the NES-CS as HAIL activities have been identified on-site but the risk to human health has not been quantified.

It is intended to prepare a Detailed Site Investigation (DSI) and Contaminated Site Management Plan (CSMP) to support the Substantive Application if the project is successfully referred.

Wildlife permit

To cover all potential outcomes, it is intended that a Wildlife Act (1953) Authority (WAA) is to be applied for from the Department of Conservation (DOC), for the handle, capture and relocation of salvaged lizards if discovered on-site, including any accidental kill.

Further specialist reporting will determine if any other approvals will be sought as part of the WAA. The details of the WAA approval are to be progressed with DOC as part of pre-lodgement consultation of the substantive

application and would be outlined in detail as part of a Lizard Management Plan, or other type of plan as required, for a substantive application.

Archaeological authority

To cover all potential outcomes, an archaeological authority subject to the Pouhere Taonga Act 2014 to partially destroy an identified archaeological site within the project area will be applied for subject to ongoing consultation with Mana Whenua.

4.1.1 Rules assessment – Operative in part Waikato District Plan

The site is zoned General Rural under the Waikato District Plan – Operative in part (OipWDP). All surrounding land is also located within the General Rural Zone. See **Figure 5** below.

The site is located within the Waikato River Catchment and Airport Obstacle Limitation Surface policy overlay areas. The adjoining designations relate to the Waikato Expressway (NZTA-1) and the DP Destination WRAL-1 relates to the obstacle limitation surface associated within the Waikato Regional Airport Ltd (WRAL). It is considered that the Hub will not affect the Regional Airport designation as the proposal will not “prevent or hinder a public work or project or work to which the designation relates” given the designation applies to the Airport Height Obstacle Limitation Surface, which will not be breached by the proposal.

The Waikato Expressway (SH1) is classed as a National Route under the DP Road Hierarchy. Pencarrow, Hooker and Duncan Roads are classed as Local Roads.

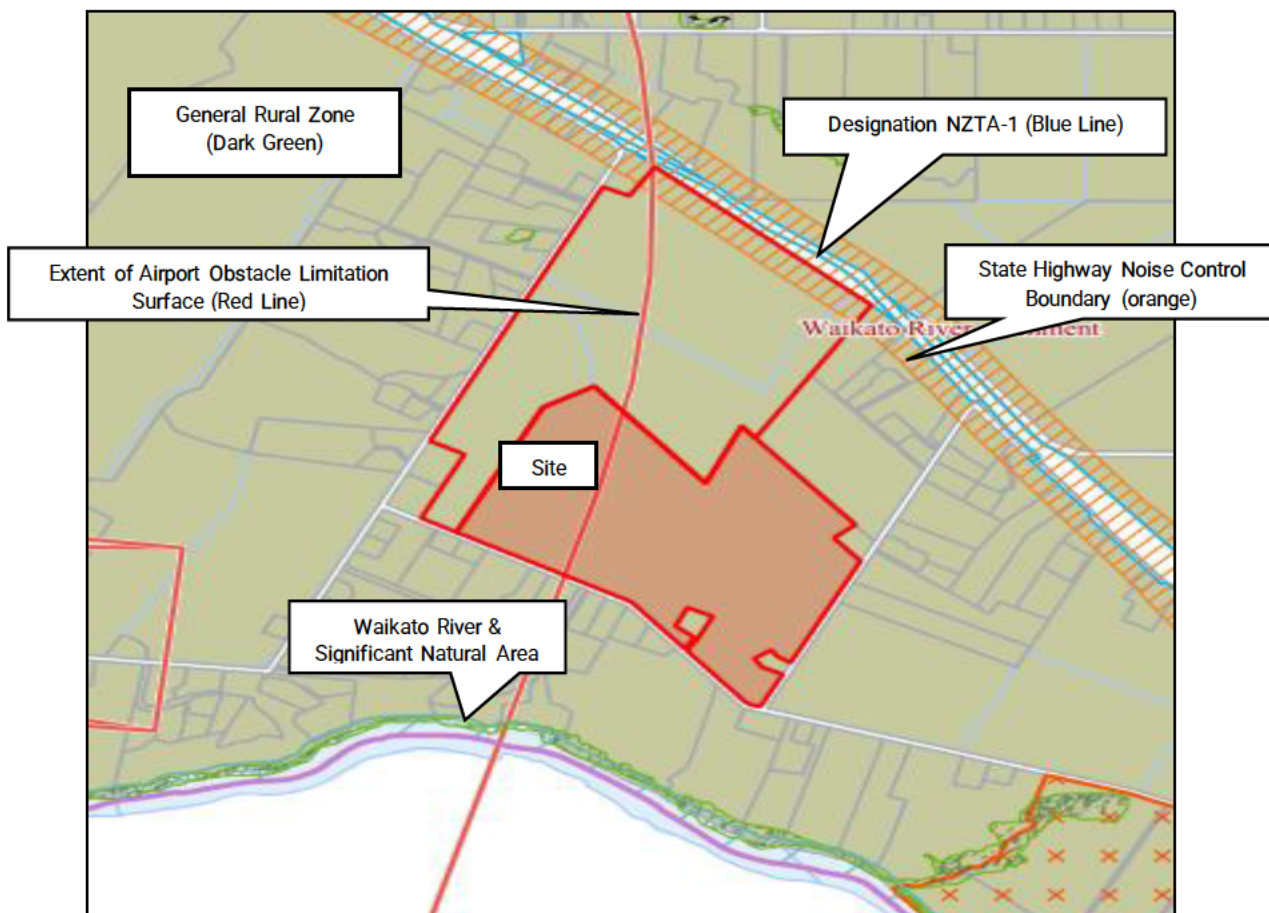


Figure 5: PDP Zoning and Features Map (Source: Waikato District Council Intramaps, retrieved 18 December 2025).

While the DP is not fully operative due to live appeals relating to the Rural Lifestyle Zone and General Rural Zone subdivision rules, this is now the dominant planning document in terms of this application.

The General Rural Zone subdivision rules subject to appeal relate to prohibited subdivision, general subdivision, boundary relocations, rural hamlet subdivisions and subdivision building platforms.

Any corresponding rules in the Operative District Plan are treated as inoperative pursuant to Section 87F of the Resource Management Act 1991 (RMA).

That being the case, the consents sought are as detailed below and in the (OipWDP) Rules Assessment attached as **Appendix G**:

General Rural Zone

- A **Restricted Discretionary Activity** consent is required pursuant to **Rule GRUZ-R38 – Rural Commercial Activities**.

Rural Commercial is defined in the OIPWDP as “a commercial activity that has a direct functional or operational need to locate in the GRUZ - General rural zone or that services productive rural activities. It includes veterinary practices, wineries and wedding venues, adventure tourism, farm tourism, golf courses, gun clubs and firing ranges and includes ancillary activities. It excludes visitor accommodation”

The proposed equine support services sector and bloodstock operation fall under this definition

- A **Non-Complying Activity** consent is required pursuant to **Rule GRUZ-R60 – Commercial Activity**. Consent is required under this rule to establish the proposed village centre, which is proposed to contain small scale commercial uses such as a bar /café. The proposed uses are still to be finalised at this stage, so consent is being applied for to accommodate these future uses.
- A **Non-Complying Activity** consent is required pursuant to **Rule GRUZ-R61 – Any Activity that is not specifically listed as a permitted, controlled, restricted discretionary or non-complying activity**. Horse Racing Activities (Thoroughbred and Harness) are not specifically identified in the District Plan. This also applies to the comprehensive retirement living precinct as this activity is not specified for within the Rural Zone. Therefore, Resource Consent is required as a Non-Complying Activity.
- A **Restricted Discretionary Activity** consent is required pursuant to **Rule GRUZ-S9 – Building Coverage – To cover all outcomes**, consent is required pursuant to the above rule to exceed the allowable building coverage within the site.

Subdivision

- A **Prohibited Activity** subdivision is proposed pursuant **SUB-R40 Prohibited Subdivision** to create the proposed rural-residential Lots as all of the Titles subject to the proposal have Title issue dates post December 1997 and contain high-class soil with more than one additional Lot being created. For conservative purposes, the creation of separate Titles for the racing infrastructure, bloodstock and equine commercial areas is also included, although this could potentially be achieved via a boundary relocation pursuant to **Rule SUB-R46**, under which approval to undertake a boundary relocation is also sought.

Transportation

- A **Restricted Discretionary Activity** consent is required pursuant to **Rule TRPT-R1 – Vehicle Access for all Activities** as the site has legal access to three local roads (Pencarrow, Hooker and Duncan Roads). Vehicle access for the development will be from all three roads.
- A **Restricted Discretionary Activity** consent is required pursuant to **Rule TRPT-R4 – Traffic Generation** as a result of the development will exceed 200 vehicles per day and more than 15% of these may be heavy vehicles.

Earthworks

- A **Restricted Discretionary Activity** consent is required pursuant to **Rule EW-R21 – Earthworks General** – The proposed development will require bulk earthworks to prepare the site for development which, being

conservative, will exceed more than 1,000m³ over an area of 2,000m² within a 12-month period due to the size of the site.

- A **Restricted Discretionary Activity** consent is required pursuant to **Rule EW- R22 – Earthworks General** – The development of the site will require importation of fill material which being conservative, will likely exceed a maximum volume of 500m³ in a single 12-month period.

Lighting

- A **Restricted Discretionary Activity** consent is required pursuant to **Rule LIGHT-R1 - Glare and Artificial Light Spill** as the proposal will likely not comply with the requirement for a maximum of 10 lux at the site boundary.

Signage

- A **Restricted Discretionary Activity** consent will be required pursuant to **SIGN-R11 – Signs General** – as signage will be proposed for the site that will exceed the maximum permitted area and height per sign, will exceed the maximum number of signs per site and will be located within 50m of the Waikato Expressway.
- A **Restricted Discretionary Activity** consent will be required pursuant to **SIGN-R13 – Signs – Effects on Traffic** – Proposed future signage will likely not comply with the requirements of this rule relating to maximum number of characters or words.

Noise

- A **Discretionary Activity** consent is being applied for pursuant to **Rule NOISE-R4 – Construction** - Construction noise will require monitoring and management in accordance with this rule during construction. To cover all outcomes, consent is being applied for to infringe this rule.
- A **Discretionary Activity** consent is being applied for pursuant to **Rule NOISE-R8 – Noise General** – It is expected that race meetings will exceed the noise limits specified in **NOISE-R8** below. This is to be confirmed via an acoustic assessment at the substantive application stage. To cover all outcomes, consent is being applied for to infringe this rule.

Temporary activities

- To cover all possible outcomes, a **Discretionary Activity** consent is applied for pursuant to **TEMP-R5 – Temporary Events** to allow for temporary events that do not meet the permitted activity standards.

4.1.2 Operative Waikato District Plan

As discussed above, there are live appeals against some rural subdivision rules in the OipWDP. For completeness, consent will be applied for under the Operative Waikato District Plan rules relating to subdivision relevant to the site that are still under appeal.

- A **Prohibited Activity** subdivision pursuant to **Rule 25.5(e)**, as the Titles subject to the proposal have Title issue dates post December 1997 and contain high-class soil with more than one additional Lot being created. For conservative purposes, the creation of separate Titles for the racing infrastructure, bloodstock and equine commercial areas is also included, although this could potentially be achieved via a boundary relocation pursuant to **Rule 25.71A**, under which approval to undertake a boundary relocation is also sought as a **Discretionary Activity**, due to the Titles not being in common ownership.

4.1.3 Waikato Regional Plan

That being the case, the consents sought are as detailed below and in the Regional Plan (RP) Rules Assessment attached as **Appendix H**:

Chapter 3 – Water module

- **Groundwater Take** - To cover all potential outcomes, a temporary groundwater take will be sought for the purpose of dewatering to lower the groundwater table during construction under Discretionary Activity **Rule 3.3.4.24**.
- **Groundwater Take** - A groundwater take will be sought for the water supply source (via an on-site bore) also under Discretionary Activity **Rule 3.3.4.24**.
- **Surface Water Take** – Consent is required as a **Non-Complying Activity** pursuant to **Rule 3.3.4.26** to use water in the proposed stormwater ponds for irrigation purposes. To cover all potential outcomes, a surface water take will be sought for the purpose of dust suppression during earthworks, and a surface water take for groundwater daylighting in construction trenches as surface water will also be applied for.
- **Discharge Permit** - If a synthetic track is constructed, consent will be required for a general discharge pursuant to **Rule 3.5.4.5**
- **Discharge Permit** - The proposal will require resource consent under Discretionary Activity **Rule 3.5.11.8** for the discharge of stormwater to new stormwater basins.
- **Diversion Permit** - The proposal will require resource consent under **Discretionary Activity Rule 3.6.4.13** to divert groundwater to lower the groundwater table for the purpose of the new stormwater basins. Consent also required pursuant to this rule for the infill and diversion of the existing artificial drainage system within the site.

It is noted that a portion of the main drainage system within the site has been previously classified as a 'stream' by WRC. A classification assessment was undertaken by Ecology New Zealand that confirmed the 'stream' is actually an artificial farm drain. WRC agreed with the findings of this assessment. This confirmation is attached as Appendix 2 of the provided ecological assessment

- **Wastewater Discharge** – To cover all potential outcomes, Consent is required pursuant to **Rule 3.5.7.7** for wastewater discharge to land as a **Discretionary Activity**.
- **Drilling** – A **Controlled Activity** pursuant to **Rule 3.8.4.7** is required for drilling below the water table for establishment of an on-site bore for water supply. To cover all potential outcomes, the proposal may require drilling below the water table for dewatering.

Chapter 5 – Land and soil module

- **Soil Disturbance** - The proposal will require resource consent under Discretionary Activity **Rule 5.1.4.13** as the soil disturbance activities will exceed a volume of 1,000m³ over an area of more than two hectares.
- **Soil Disturbance** - To cover all potential outcomes, the proposal will require resource consent under Discretionary Activity **Rule 5.2.5.5** for large scale cleanfill disposal outside of a high-risk location. Consent is also required pursuant to this rule if a synthetic track is proposed for importation of sand to mix with material consented under **3.5.4.5**.

4.2 Other rules

This application also seeks any other resource consent approvals necessary to implement the Hub which are not detailed above.

4.3 For each proposed approval (s13(3)(a) and (b))

The applicant is eligible to apply for any corresponding approvals under any of the acts specified in this application as per s13(a) of the FTA.

The referral application is proposed to be lodged by WTR who will hold all approvals applied for as part of the consent application as per s13(a) of the FTA.

4.4 Assessment of the project against the criteria of s22 of the Fast Track Approvals Act

The proposal is assessed against the criteria of section 22 in the below subsections.

4.4.1 The project is a development project that will have significant regional or national benefits (s22(1)(a))

The proposal is a development project that will have significant regional and national benefits for the following reasons.

In regard to the consideration of a relevant government policy statement as per s22(1A), there are none relevant to this proposal as the only policy statement prepared in relation to the FTAA is regarding grocery competition.

4.4.1.1 Supporting a significant regional industry

As outlined in the Economic Impact Assessment (EIA) (attached as **Appendix B**), the Waikato is a core region for thoroughbred breeding and training in New Zealand. Establishing a modern “Hub” reinforces this cluster by centralising expertise, infrastructure, and industry participants. The consolidation of facilities enhances industry competitiveness and potentially attract participants and investment from outside the region.

The current state of racing infrastructure in the Waikato is that they are fragmented and are in an ageing condition. The consolidation of these facilities into a single, purpose-built Hub improves operational efficiency, reduces duplication of maintenance and capital expenditure, and enhances productivity across racing, training, broadcasting and event delivery.

A modern facility designed to current standards improves race quality, animal welfare outcomes, and wagering performance, all of which are key revenue drivers for the industry. A thriving racing sector also supports associated industries including breeding, veterinary services, feed suppliers, transport operators and professional services.

Once operational, the consolidated racecourse will support direct employment (racing operations, training, administration, events) and indirect employment across the wider racing industry. By strengthening the viability of the regional racing sector, the proposal protects and enhances long-term employment opportunities in the Waikato.

Furthermore, a modern, consolidated facility capable of hosting high-quality race meetings and major events will attract participants and spectators from outside the region and outside of New Zealand. This creates the potential to attract residents and tourists from beyond the broader Waikato Region as well as the rest of the country and internationally. This would enhance the region's profile, triggering further economic investment and growth.

This generates further economic benefits across accommodation, hospitality, transport, and retail sectors. Event-based tourism contributes to regional GDP and supports local businesses, particularly in sectors aligned with the visitor economy.

Overall, it is considered that the project has significant regional benefits that meet the purpose of the Fast Track Approvals Act, which is confirmed in the EIA.

4.4.1.2 Economic benefits

The WTR Greenfield Racing Hub will bring significant regional economic benefits estimated to add almost \$200m GDP for the Waikato – including direct expenditure of over \$400m over the eight year development period.

The Hub will provide this benefit through:

- enhancing racing productivity in the Waikato

- acting as a centre of excellence and fit-for-purpose facility for the racing industry
- creating employment and skill development opportunities
- increasing tourism opportunities for the wider region
- increasing housing supply and capacity for new commercial activity once decisions have been made to divest and redevelop the current sites once no-longer required.

As discussed in this application and in the Economic Impact Assessment (EIA) prepared by Property Economics (attached as **Appendix G**), the quantified economic benefits of this proposal include, but are not limited to the following (Table 5).

Regional Benefits	Economic Benefit
Total direct expenditure over an 8-year development period (excl. land)	\$406.3m
Total GDP NPV at 8% over an 8-year development period	\$138.0m
Total GDP NPV at 2% over an 8-year development period	\$169.0m
Total full time employment years during the peak development year	399 FTE years
Total FTE years over the 8-year development period	1,156 FTE years
Total direct employment over the development period	439 FTE years
Total indirect and induced employment over development period	717 FTE years

Table 5: Quantified Economic Benefits of the WTR Greenfield Racing Hub

Under a scenario where development starts earlier in 2030 and spans eight years (with a three-year core construction phase), this would lead to an estimated increase in total value added (GDP) of around \$161m for the Waikato region over this time.

Applying a 2% discount rate, the Hub is estimated to generate approximately \$197m in total business activity across the Waikato region over the full development timeframe.

In addition, this world class Hub will bring the expertise of the local racing fraternity together in a centralised location and has the potential to bring international investment by being a 'destination' for horse racing in New Zealand.

4.4.1.3 Increasing housing supply

Indirectly through the construction of the Hub, approximately 159ha of land within existing urban limits will be freed up for residential development, reducing the need to rezone further areas of rural production land for residential development.

This improves overall land-use efficiency and contributes to a well-functioning urban environment. The addition of further rural residential development increases options available to potential residents within a distinctive, racecourse-integrated setting, offering an alternative to more conventional urban or rural lifestyle opportunities.

In doing so, it responds to increasingly diverse household preferences, including demand for lower-density living environments, ageing-in-place opportunities, and more specialised forms of accommodation.

4.4.2 Facilitation of the project by enabling a cost-efficient and timely process (s22(1)(b)(i))

The fast-track approvals process will streamline the approval process of the Hub, allowing for more timely and cost-effective processing compared to the standard Resource Management Act (RMA) process. The fast-track process offers several key advantages in terms of reduced timeframes, as public notification is excluded under the Fast-track Approvals Act (FTAA).

The Expert Panel is only permitted to invite comments from specified parties, with a shorter timeframe for submissions, ensuring the process remains focused and efficient. Appeals to the Environment Court are not possible. This project would require both a plan change and a resource consent under the RMA, necessitating a two-stage RMA process.

The RMA approach would significantly extend the consenting timeframe and increase the risk of delays due to potential appeals to the Environment Court. Therefore, this delay could put securing the site at serious risk due to conditional agreements lapsing. Substantive delay can result in significant financial impacts and longer timeframes that can negatively affect the final outcome.

In contrast, the FTAA substantially reduces delays and mitigates associated costs, including construction disruptions, rising material expenses, and seasonal workforce constraints.

Furthermore, under the RMA, prohibited activities (such as the rural subdivision) cannot be consented. This is a significant benefit of using FTAA process.

Additionally, under the RMA, the non-complying aspects of the Hub and loss of highly productive land could prove to be difficult to actually be consented by Council. The significant regional benefit test of the FTAA is a key factor in enabling consent to be granted.

Therefore, the fast-track framework is clearly fit for purpose for the Hub, enabling a more streamlined process and avoiding further costs and delays, ensuring that the region can benefit from the Hub within a much faster timeframe.

4.4.3 The referral of the project is unlikely to materially affect the efficient operation of the fast track approval process (s22(1)(b)(ii))

The applicant has engaged a project team who are already progressing towards the preparation of a substantive application package.

Therefore, the successful referral of the Hub will see the substantive application lodged in the following months to ensure the efficient operation of the fast-track process.

4.4.4 Assessment of the proposal against S22(2) of the Fast Track Approvals Act

For the purposes of subsection (1)(a), the Minister may consider—

(a) whether the project—

- (i) has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list:

Comment:

The Hub has not been identified as a priority project under any of the above documents.

- (ii) will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure:

Comment:

The Hub is not for the delivery of significant infrastructure as per the definition under the FTA.

- (iii) will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020):

Comment:

The Hub will contribute to increasing housing supply and a well-functioning urban environment as discussed in section 4.4.1.3 above.

- (iv) will deliver significant economic benefits:

Comment:

*The Hub will deliver significant economic benefits (both directly and indirectly) as discussed in section 4.4.1.2 above and further outlined within the provided EIA (**Appendix B**).*

- (v) will support primary industries, including aquaculture:

Comment:

The Hub will support the Waikato racing and bloodstock industry, which is considered to be a primary industry. This is discussed further in the EIA.

- (vi) will support development of natural resources, including minerals and petroleum:

Comment:

This is not applicable as the Hub does not support the development of natural resources.

- (vii) will support climate change mitigation, including the reduction or removal of greenhouse gas emissions:

Comment:

*Commentary on how the Hub will support climate change mitigation is outlined in section 7.2 below and the flooding and integrated traffic assessments attached as **Appendix E and K** respectively.*

- (viii) will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards:

Comment:

*Commentary on how the Hub will support climate change adaptation and management of risks from natural hazards is outlined in sections 7.2 and 8.3.5 below and the flooding and geotechnical assessments attached as **Appendix E and P** respectively.*

- (ix) will address significant environmental issues:

Comment:

Commentary on how the Hub will address environmental issues associated with the Hub is provided in section 4.10 below.

- (ixa) will promote competition in the grocery industry:

Comment:

This is not applicable as the Hub does not promote competition within the grocery industry.

- (x) is consistent with local or regional planning documents, including spatial strategies:

Comment:

Overall, the Hub is considered to be inconsistent with local planning documents and spatial strategies, given the site is not identified for growth and the overall activity status under the Operative in Part Waikato District Plan.

Despite not aligning with local /regional plans, as outlined in this planning report, the proposal will have significant benefits for the region

4.5 Ineligible activities (s13(4)(c))

The Hub does not involve any ineligible activities for the reasons outlined below:

- The subject site is not within a customary marine title area and is not identified Māori land or Māori customary land.
- The Hub does not relate to an activity occurring in an area that is taiāpure-local fishery, a mātaihai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996.
- The activity is not an aquaculture activity, or an activity that is incompatible with aquacultural activities or does not require an access arrangement under section 61 or 61B of the Crown Minerals Act 1991, is not occurring on land that is listed in Schedule 4; and has not been subject to a determination under section 24.
- The activity is not occurring on a national reserve held under the Reserves Act 1977; and has not been subject to a determination under section 24.
- The activity is not a decommissioning-related activity (which is an activity described in section 38(3) of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or an activity undertaken for the purposes of an offshore renewable energy project.
- The activity is not a prohibited activity under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or regulations made under that Act. The activity is not an activity that would be prohibited under section 15B or section 15C, of the Resource Management Act 1991.

4.6 A description or map of the whole project area (S13(4)(d))

4.6.1 Subject site description

The project area is identified in the master plan prepared by Design Group Stapleton Elliot attached as **Appendix C** and illustrated in **Figure 3** below.

The site consists of five Records of Title being RTs 632409, 650205, 650204, 1027516 and SA383/181. Titles 632409, 650205, 650204 are in common ownership, while Titles 1027516 and SA383/181 are also in common ownership but are separately owned from the three aforementioned Titles.

Discussions are currently ongoing with the current landowner to have the future option to acquire the 1.35ha property at 644 Pencarrow Road (RT 632392). WTR is considering acquiring this property to optimise site layout and better manage transport.

Therefore, this property has been included in the referral application package to allow flexibility to obtain this property in the future.

Overall, the site comprises an area of 163.9109ha (165.5ha if 644 Pencarrow Road is included) and currently contains two separate Dairy farming operations, with the majority of the land being held in pasture.

The site currently has a number of existing vehicle entrances from Pencarrow (x3), Hooker (x1) and Duncan (x2) Roads

The topography of the development area is predominantly flat, rising slightly along the western side of the property.

4.6.2 Surrounding locality

The site is bordered on three sides by Pencarrow, Hooker and Duncan Roads, which are all local roads within the Waikato District Council roading hierarchy. The Waikato Expressway runs along a portion of the northern boundary of the site.

The Te Awa Cycleway also runs along the Pencarrow and Hooker Road boundaries of the site.

The surrounding environment consists of rural residential development (as shown in Figure 3 below) with a small number of larger productive land holdings interspersed amongst the rural residential development.

The site is approximately 6km from the Cambridge urban boundary, 3km from Hamilton International Airport and 5.5km from the boundary of Hamilton City.

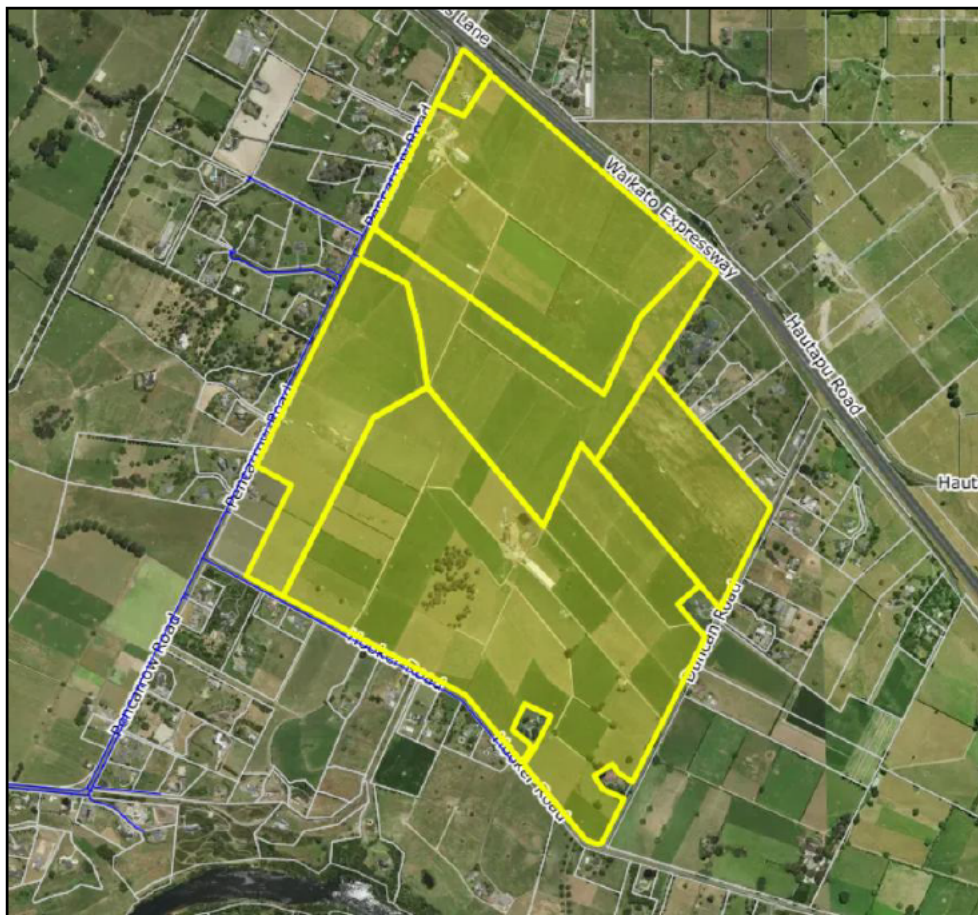


Figure 3: Enlarged Site Locality Image (Site highlighted in yellow) Source: GRIP Maps.

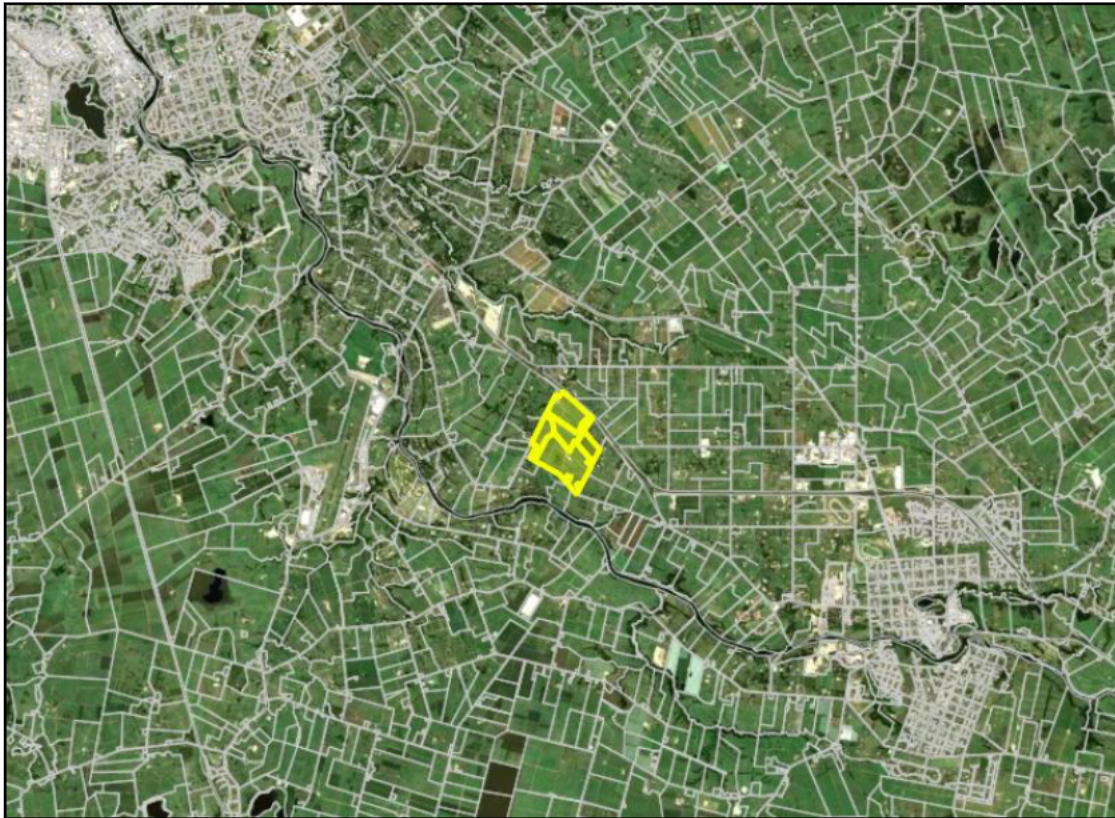


Figure 4: Wider Locality Plan (site highlighted in yellow) Source: GRIP Maps.

4.7 Commencement and completion dates for construction activities (S13(4)(e))

Construction is currently proposed to start in 2032, subject to approval of regulatory consents and funding. Funding requires the staged disposal of WTR's and Waikato Bay of Plenty Harness's existing assets to assist with funding of construction and site development. This process can take three to five years to dispose of all existing sites while allowing thoroughbred and harness racing to continue while the sites are disposed of. The intent is for the racecourse and raceway facilities to open for the 2036 racing season.

Over the entire eight-year development period, the core construction phase of the racing infrastructure, retirement village and bloodstock facilities will be over the three years prior to opening of the Hub in 2036.

The phases of construction will be further outlined at substantive stage if the referral is successful.

If consents and funding of the project run smoothly, there is the potential for construction commencing on-site as early as 2030.

4.8 A statement of whether the project is proposed to proceed in stages (S13(4)(f))

This is a single stage project under the Act.

4.9 Whether part of the project is proposed as an alternative project (S13(4)(g))

No part of the proposal is an alternative project pursuant to s13(4)(g).

4.10 Anticipated and known effects of the project on the environment and the significance of those effects(S13(4)(h))

The key potential adverse effects of the Hub are identified below and should be reviewed in conjunction with the supporting technical expert memorandums accompanying this application.

4.10.1 Landscape and visual effects

As discussed in section 4.4.1 above, the site is currently used for productive rural use, with the surrounding land uses consisting of predominately rural residential activity.

Urban Design

Reimagine have prepared an Urban Design Assessment (attached as **Appendix I**) of the proposal, with the key findings provided in the below excerpt:

“The WTR Greenfields Racecourse is fit for purpose as a Referral Fast Track submission. The proposal presents a coherent, masterplanned spatial framework that is appropriate to the scale, function, and long-term ambition of the development, and that demonstrates a clear and well-evidenced understanding of the site’s physical, cultural, ecological, and planning context.

The decision to locate the formal public entrance on Hooker Road, to centralise the primary racing and training core within the interior of the site, to retain and integrate the existing copse of Kahikatea trees and the recorded archaeological site as character-defining features, and to extend the pedestrian and cycling network through the site as a complement to the Te Awa River Ride - each of these decisions reflects a spatial logic that is grounded in good urban design principles and responsive to the realities of the receiving environment.

The architecture of the main Event + Operations building - conceptually anchored in the arborescent form of the Kahikatea forest that once characterised this landscape - demonstrates that the design team has understood and responded to the place-specific opportunities of the site in a way that transcends generic infrastructure design. This level of conceptual ambition, delivered at Stage #1, provides a strong and credible foundation for the detailed design resolution that the substantive application will require.

The proposal demonstrates a mature and transparent understanding of the urban design-related risks associated with a development of this scale, in this context, at this stage of the consenting process. The key risk areas - including the conversion of highly productive land, the management of rural amenity and interface effects, the relationship with the Te Awa River Ride, and the proportionality of the Village Hub and residential components relative to the receiving environment - have each been identified, acknowledged, and addressed through the spatial structure, landscape strategy, and access hierarchy of the masterplan.

The proposed mitigation approach - landscape buffers, setbacks, internal separation of movement types, and the use of staging as a design and risk-management tool - is considered proportionate and credible at Stage #1. More detailed resolution of these mitigations, including the specific boundary treatment designs, lighting strategy, and visual impact assessment, is appropriately deferred to substantive stage”

Therefore, it is considered that potential adverse effects can be appropriately managed and mitigated, specifically through further integrated urban design, and that the proposal is supported from an urban design perspective.

Landscape

SLR Consulting have prepared an assessment of Landscape effects relative to the proposal (attached as **Appendix J**) and details the landscape (and visual) effects of the proposed development. The conclusions of this assessment are provided in the below excerpt:

The site and immediate surrounds are collectively an attractive rural landscape with attributes of note but lack features of regional significance. For these reasons the existing landscape is assessed to have a Moderate landscape value.

- *The landscape relevant objectives and policies of the district plan seek to maintain and enhance the rural and landscape characteristics of an area. They provide for rural industries and built form providing they maintain rural character and amenity. From a landscape perspective with the exception of the removal of high-quality soils from the site, inherent in the proposal, the development is considered to appropriately mitigate landscape effects to the rural character and provide a proposal in keeping with the rural character of the area.*
- *The proposal will result in a Low - Moderate degree of adverse physical effect to the landscape character and values of the site and surrounds during construction and until proposed planting has established. Thereafter the proposal is assessed as having Low physical effect to the landscape. Thereafter the proposal is assessed as having Low physical effect to the landscape in the mid and long terms once planting has established.*

- *The visual catchment, for any potentially meaningful view of the proposal, is contained within a maximum 500m radius of the site to the west, south and east. However, within that 500m radius views of the site are frequently obscured by built form, topography and existing vegetation.*
- *For the community living, visiting, working and moving past the site and surrounds the proposal and its construction will have limited adverse perceptual effects. The proposal will be visible depending on proximity, intervening and proposed vegetation in the short, mid and long term but will be largely assimilated into the landscape in the mid to long term. For the reasons outlined above adverse perceptual effects, including visual, to the landscape are assessed as Low-Moderate in the short-term receding to Low in the medium term.*
- *Detailed findings that contributed to the above assessment of perceptual effect were taken from representative viewpoints to the surrounds of the site. They found that visual effects ranged between Moderate for four viewpoints to the southeast corner to Low for the majority of other viewpoints in the short term to Low – Moderate to Very Low for all viewpoints in the mid and long term.*
- *It is assessed that there will be a Low degree of adverse effect on the associative values of this landscape, predominantly arising from the resultant loss of rural character to the southeast corner of the site.*
- *Taking these ratings together, the proposal is assessed as having a Low - Moderate degree of adverse effect to the landscape in the short term and Low degree in the medium and long terms.*

Based on the above assessments, it is considered that the proposal will be able to be successfully assimilated into the receiving environment subject to specific design and will have adverse effects relating to urban design and landscape character that will be less than minor.

4.10.2 Infrastructure and servicing

BCD Group have prepared an Infrastructure Assessment with accompanying drawings, which has been attached to the referral application as **Appendix E**.

The Hub will be serviced for water supply via on-site means consisting of an on-site bore supplemented by roof and other surface water collection, with stormwater proposed to be re-used through the use of storage ponds on-site. This water will be utilised for track irrigation.

Wastewater from the Hub will be managed via on-site measures subject to specific design at the substantive application stage upon successful referral.

The provided civil assessment demonstrates that the proposal can be appropriately serviced, therefore it is considered that any adverse environmental effects as a result of the proposal in relation to infrastructure and servicing will be no more than minor subject to specific design.

4.10.3 Transportation

BCD Group have prepared an Integrated Transportation Assessment (ITA) which has been attached to the referral application as **Appendix K**. This assessment details the approach to transportation and how the development can integrate with the wider transport network. This assessment has been peer reviewed by Don McKenzie Consulting.

The ITA discusses effects relating to the following points, which are discussed in further detail in the ITA

- Existing Condition of the Transport Environment
- Proposed Activities and Trip Generation
- Site Access and Roadway Upgrades
- Parking and travel demand measures
- Active and public transport

- Construction traffic
- Traffic modelling and next steps

The proposed transport network will be designed to prioritise safety and emissions reduction to ensure alignment with national and regional transport planning documents.

The ITA demonstrates that the traffic associated with the hub can be appropriately mitigated, therefore it is considered that any adverse environmental effects as a result of the proposal in relation to transportation will be no more than minor subject to specific design.

4.10.4 Construction effects

Construction of the proposed development is likely to give rise to the environmental effects outlined in the sections below.

4.10.4.1 Earthworks

Earthworks for the Hub will be carried out in accordance with best practice and undertaking of appropriate erosion and sediment control measures to ensure potential adverse effects relating to earthworks are avoided or minimised. Indicative volumes of earthworks to achieve the proposed change in levels are proposed as below:

- 370,000 m³ of cut.
- 300,000 m³ of fill.
- A max cut depth of 4m.
- A max fill depth of 3m.
- An additional 300,000m³ of cut across the site is estimated for the removal of topsoil.
- 40,000 m³ of fill for the infill of drains.

Earthworks are proposed to be carried out during the summer earthworks season to reduce the potential discharge of sediment into receiving waters.

Any potential adverse earthworks effects are able to be mitigated and managed via a detailed Erosion and Sediment Control Plan, which will ensure that the required earthworks do not result in any more than minor adverse environmental effects beyond the site boundary.

4.10.4.2 Dust

During construction, it is anticipated that there will be dust potentially generated by the earthworks and land disturbance, which is able to be mitigated and managed via a Construction Management Plan (CMP) which will be prepared as a condition of consent. In addition, boundary landscape treatment is proposed to be planted at the earliest opportunity to assist with dust mitigation during the construction phase. Implementation of the CMP will ensure that any adverse environmental effects will be no more than minor.

4.10.4.3 Construction noise and vibration

During construction, noise and vibration is anticipated to occur as a result of the works proposed to be carried out on the site. Construction will be managed in accordance with the NZS 6803:1999 Acoustics – Construction Noise and German Standard DIN 4150-3:1999 Structural vibration – Effects of vibration on structures

Construction noise and vibration, will be managed in accordance with a Construction Management Plan ('CMP').

The CMP will outline potential mitigation measures including, but not limited to: restrictions on days and hours on noisy works, a complaints process, and use of quieter machinery to ensure that potential construction noise effects

of the project are appropriately managed. Implementation of the CMP will ensure that any adverse environmental effects will be no more than minor.

4.10.4.4 Construction traffic

It is anticipated that there will be potential environmental traffic effects as a result of the construction of the proposed development. Construction traffic effects will be temporary in nature and will be managed in accordance with a Construction Traffic Management Plan ('CTMP').

A CTMP (as per NZGTTM) will stage construction access via the Pencarrow Road, Hooker Road, and Duncan Road frontages only, set daily HCV limits and haul routes, manage the cycleway interface, and secure route/cleaning commitments.

The CTMP will be certified and implemented prior to commencement of works.

The bulk of construction and related earthwork traffic movements will be kept within the boundaries of the site and will have no more than minor environmental effects subject to implementation of the CTMP.

4.10.5 Ecological effects

An Ecological Impact Assessment (ECIA) has been prepared by Awa Ecology (attached as **Appendix L**), which concludes that across the majority of the site, the ecological value of the vegetation and habitats range from negligible to low.

In regard to the Kahikatea stand within the site, this has been identified as an underrepresented habitat type, contains an area of natural wetland and provides potential habitat for the Long-Tailed Bat (Pekapeka-tou-roa). Therefore, this area has been assessed as having high ecological value.

The ECIA has provided an overview of potential adverse ecological effects of the development which are identified and summarised below:

- Effects on terrestrial vegetation.
- Effects on terrestrial fauna.
- Effects on freshwater habitats and biota.

On a detailed level, effects include vegetation clearance and disturbance to bat habitat and behaviour (including any lighting effects) and impacts on aquatic habitat and fish. These are summarised below:

4.10.5.1 Effects on terrestrial vegetation

As discussed above, the remnant Kahikatea stand has high ecological value. All other vegetation within the site outside of the stand is exotic including the hedgerows within the site which are comprised of weedy species and exotic trees.

Outside of the remnant Kahikatea stand, the remainder of the vegetation on the property has low botanical value.

The large exotic trees within the wider site trees provide commuting and foraging habitat for bats, as well as potential roosting habitat. Any clearance will need to be managed in accordance with the requirements in this report.

The remnant block also provides important foraging and commuting habitat for long tail bats as well as potential roost habitat. Restoration and management recommendations that would provide a net positive ecological benefit in the future have been provided in Appendix 7 of the provided ecological assessment.

Additionally, the creation of bare earth as a result of construction has the potential for weed colonisation, and this is highly likely given the nearby seed source. Therefore, any open areas will be managed by an approved erosion and sediment control plan.

Undertaking site works in accordance with a prescribed Ecological Management Plan (EMP) will ensure that any potential adverse effects in relation to terrestrial vegetation can be sufficiently mitigated.

4.10.5.2 Effects on terrestrial fauna

Fauna ecological values on the site range from very high for 'Threatened – Nationally Critical' long-tailed bats within the Kahikatea stand, to low for common indigenous bird species and shortfin eel within the rest of the site.

Bat Monitoring has been undertaken within the site at nine locations over a 20-night period, with low activity within the areas of farmland, and relatively high activity within the Kahikatea stand. It was determined that the Kahikatea stand was a commuting passage and occasional feeding area. Roosting activity was not identified within this stand, however the presence of a nearby roost cannot be ruled out.

The intention for the Kahikatea stand is for this area to be maintained as an ecological feature of the site, with measures proposed to enhance and rehabilitate this area including but not limited to:

- A minimum 25m setback for artificial lighting, pest control and rehabilitation planting to restore and increase the ecological value of the Kahikatea stand.
- A bat commuting corridor is also proposed from the southern site boundary to the Kahikatea stand to allow for bats to travel to the Kahikatea stand from outside the site.

The design and location of the bat commuting corridor and lighting design will be confirmed at substantive stage.

In addition to the above, an Ecological Management Plan will be prepared, including a site-specific Fish Management Plan (FMP) and separate Bat Management Plan (BMP).

Implementation of the above management plans will ensure that any adverse ecological effects of the proposal on terrestrial fauna will be no more than minor.

4.10.5.3 Effects on freshwater habitats and biota

The existing drainage systems on site have been confirmed as artificial watercourse by Ecology NZ, with the assessment being agreed with by Waikato Regional Council (WRC)

The artificial watercourses on site are shallow and likely ephemeral, with minimal overhead canopy cover and riparian vegetative protection. It is noted that no fish were recorded during the trapping survey. Shortfin eels were detected during an eDNA survey at the outlet of the site.

Overall, it is considered that the watercourses onsite are of low ecological value.

However, given that the watercourses do provide habitat for shortfin eels, all activities on site will need to be managed to ensure there are no adverse effect on these environments. Fish recovery will take place so long as water is present within the drainage channels as these drains will require diversion due to their locations within the site in relation to the proposed development.

A Fish Management Plan (FMP) will be designed in accordance the WRC guidelines, mitigating potential adverse effects to any aquatic biota present onsite.

In addition, specific measures will need to be implemented as part of any future development on the land to ensure that contaminants from the proposed development do not enter downstream waterways.

The ECIA concludes that provided a Fish Management Plan (FMP) is designed and implemented onsite during development, this mitigation will reduce any potential adverse effects on fish and freshwater habitat to very low and will be no more than minor.

4.10.6 Lighting effects

The proposal will encompass track lighting for the harness racing facility and thoroughbred training track, with harness racing occurring during night-time hours and the training track being used in the early morning from approximately 4:30am.

A lighting memorandum has been prepared by Dr Richard Dluzniak Consulting Pty Ltd which outlines lighting requirements for the above activities and has been attached as **Appendix D**.

This memo identifies that while it will appear to be difficult to comply with District Plan requirements regarding light spill at the site boundary, a variety of mitigation measures can be applied in regard to lighting (external floodlight hoods and louvres, use of tighter floodlight beam optics, reduced mast spacing, etc).

It is considered that internal and exterior lighting related to the proposed future buildings will be compliant with District Plan requirements.

A finalised lighting design will be submitted alongside the substantive application to ensure any adverse environmental effects as a result of light spill will be less than minor.

4.10.7 Archaeological effects

An archaeological assessment of the site has been undertaken by Dr Warren Gumbley which has been attached to the application as **Appendix M**. This included investigation of the identified borrow pits and surrounding areas and evaluates the potential effects of the proposal on the archaeological values of the site, which is mainly limited to a loss of information gathering opportunity.

The assessment acknowledges the site contains an identified archaeological site (Ref S15/573) which is a Māori horticultural site, notably containing seven borrow pits and an area of Māori horticultural soils, which is divided into a northern and southern portion by an existing dwelling and accessory building. It is noted that the borrow pits have been filled over time by the landowner, resulting in these sites becoming progressively less visible over time.

Given the site's position on relatively high ground in the local context, it is likely that the area has been ploughed in the past, which would have damaged the Māori-made soil component of the site.

The estimated extent of the Māori horticultural soils is approximately 2.2ha (based on field auger investigation). The northern section totals approximately 1.6ha and the southern portion being 0.6ha.

To be conservative and cover all options, for the referral application it is proposed to destroy the southern portion of the site, along with 0.7ha of the northern portion to allow for the development of rural residential sections, subject to an approved archaeological authority from Heritage New Zealand and ongoing engagement with Mana Whenua.

The remainder of the archaeological site (approx. 0.9ha) is proposed to be retained and protected via a covenant or vesting of this area with Council as a reserve, therefore preserving elements of the horticultural remains.

This would provide an opportunity for further interpretation and information gathering of the archaeology and the surrounding cultural landscape.

Therefore, the Māori-made soils and their associated archaeology will be affected by the proposed development activities, particularly earthworks, with adverse effects relating to loss of information gathering opportunities, given the limited archaeological data available in the Tamahere area.

Dr Gumbley has made the following recommendations in regard to the site, which are proposed to be followed in relation to the preparation of an archaeological authority with Heritage NZ:

1. *Site S15/573 is an archaeological site; therefore, an Authority under The Heritage New Zealand Pouhere Taonga Act 2014 is required before any development affecting S15/573 can begin.*

2. *The unaffected part of S15/573 should be safeguarded by a covenant that includes the surveyed extent of the area to be protected and management clauses to ensure the site's preservation in perpetuity.*
3. *It is important to determine the extent of Māori-made soils and related archaeological deposits in the area to be covenanted for effective management. Therefore, adequate investigation must be undertaken to determine this. This information should be documented on a survey plan and filed with the NZ Archaeological Association site file S15/573.*
4. *An archaeological management plan should be implemented to oversee the archaeological site during development (Archaeological Management Plan: S15/573 Duncan Road, Pukeroro, Waikato, March 2026). The archaeological management plan may be revised as necessary with the consent of Heritage New Zealand Pouhere Taonga.*
5. *An archaeological investigation of the section of S15/573 affected by residential development must be conducted to recover archaeological information that would otherwise be lost.*
6. *Archaeological investigation shall be directed by an Archaeological Research Strategy (Archaeological Research and Mitigation Strategy: S15/573, Duncan Road, Pukeroro, Waikato, March 2026). The research strategy plan may be revised as needed with the consent of Heritage New Zealand Pouhere Taonga.*

Dr Gumbley has prepared an archaeological management plan and research and mitigation strategy to accompany an application for an archaeological authority, which have been included as part of a substantive application.

Undertaking the above recommendations will mitigate the adverse archaeological effects relating to loss of the ability to address a shortfall in knowledge of Māori horticultural processes and will therefore provide an archaeological benefit.

Subject to the implementation of the management plan and research and mitigation strategy, it is considered that and adverse archaeological effects will be no more than minor.

4.10.8 Cultural effects

It is acknowledged that the proposal results in a significant change to the existing landscape and will give rise to adverse cultural effects as a result of the potential destruction of the three burrow sites and horticultural soils in the south. Ngāti Hauā and Ngāti Koroki Kahukura as mana whenua have been engaged with and consulted to this point of the project consisting of two site visits and various correspondence sharing project documents.

Representatives from Ngāti Hauā and Ngāti Koroki Kahukura have also been engaged to prepare Cultural Impact Assessments (CIA), which will be completed and submitted with the substantive application if the referral is successful.

Waikato Tainui have also been consulted via an in-person meeting and acknowledged that Ngāti Hauā and Ngāti Koroki Kahukura will lead the CIA work and have final say.

Through ongoing and meaningful engagement with Mana Whenua, it is considered that any potential adverse effects can be appropriately mitigated.

Undertaking of appropriate protocols (such as Karakia, cultural monitoring and cultural protocols), involvement in the design of the development and any cultural imagery that could be integrated onto the site and involvement in the preparation of the ecological management plan for the site are examples of mitigation.

Ongoing consultation with Iwi will occur, providing opportunities to use Mana Whenua expertise to integrate local values and cultural heritage.

This presents an opportunity to reflect the area's cultural history in the development, including through activities, facilities, forms, artwork, local flora, and materials, providing a significant cultural benefit.

Provided ongoing consultation is undertaken, it is considered that and potential adverse cultural effects will be no more than minor.

4.10.9 Acoustic effects

An acoustic memo has been prepared by Bladon Bronka Acoustics (BBA) that has been attached to this application as **Appendix N**.

This assessment identifies and evaluates the anticipated acoustic and vibration effects of the Hub during both construction and operation.

A detailed acoustic survey and design will be submitted alongside the substantive application to ensure any adverse environmental effects as a result of noise will be no more than minor.

4.10.10 Contamination effects

A Preliminary Site Investigation (PSI) has been prepared by BCD Group Ltd and is attached to this application as **Appendix F**.

As outlined in section 3.1.3, the report summarises that the site has a history of potential activities listed under the Hazardous Activities and Industries List (HAIL),

- Agrichemical storage and use at the Site
- Fuel storage at the Site
- Treated timber pile storage
- Presence of a farm dump and offal pits
- Burn pile

It is considered that any adverse effects relating to contamination can be mitigated through preparation of a contaminated site management plan (CSMP) and undertaking any necessary site remediation prior to earthworks commencing on site and will therefore be no more than minor.

4.10.11 Acid sulfate soils effects

BCD Group have undertaken a desktop assessment of the site for the presence of acid sulfate soils. This has been attached as **Appendix O**. The desktop assessment has identified that the Site is regarded as high risk by WRC for the presence of acid sulfate soils.

A site inspection did not identify any visual indicators of acid sulfate soils such as distressed vegetation or clear or milky green water in the drains at the Site.

While the presence of acid sulfate soils at the Site has not been confirmed, the field observations and sampling align with the WRC mapping programme and that there is a risk of acid sulfate soils underlying the Site.

Following the decision tree outlined in the WRC guidance, there is the potential for the disturbance of acid sulfate soils.

The next steps in relation to this includes undertaking a more in-depth assessment to confirm the presence of acid sulfate soils and development of a management plan to manage the soils.

This further assessment to be undertaken at substantive stage would allow for more certainty around the presence (if any) and potential impacts of the acid sulfate soils at the Site.

4.10.12 Highly productive land effects

The site of the Hub contains highly productive land (HPL) being mapped as mostly Land Use Capability ('LUC') 1s 1, 2s 1 and 2w 3. There is an area of 4e 2 soil along the Pencarrow Road boundary of the site which is not high-class land.

While the proposal technically results in a loss of productive capacity of HPL through the construction of buildings and other land uses associated with the proposal, overall, the proposal supports a rural based industry that is a significant contributor to the Waikato economy, and the wider national economy.

This is achieved via the release of 159.5ha of land zoned for urban development within current urban limits, which avoids the need to rezone other areas of HPL for urban use.

The Hub avoids any significant cumulative loss of HPL via the release of urban zoned land for development that reduces the need to rezone further areas of HPL. This is achieved via the release of 159.5ha of land zoned for urban development within current urban limits, which avoids the need to rezone other areas of HPL for urban use.

The Hub can also achieve social and economic benefits that significantly outweigh the long-term social and economic costs associated with the loss of highly productive land, which have been outlined in section 4.3 of this report.

It is considered that the proposal does not fragment a large geographically cohesive area of HPL as the site is currently in different ownership and is surrounded by rural residential development and the Waikato Expressway, which has already fragmented the surrounding environment.

Overall, while the proposal does not retain the productive capacity of highly productive land to the intent of the NPS, the proposal does provide a wide variety of other benefits across environmental, social, cultural and economic sectors that significantly outweigh the long-term costs of the loss of HPL for primary production, while supporting a rural based industry.

Therefore, it is considered that any adverse effects from loss of HPL as a result of the Hub are, (when considering the benefits associated with the proposal) are no more than minor.

4.10.13 Overall effects conclusion

This report, and supporting reports from the relevant technical experts, identify a range of measures to address potential adverse effects and ensure that those adverse effects are avoided, remedied or mitigated.

This includes the application of standard and well-established mitigation measures and specific measures to mitigate the effects of this particular proposal.

These effects can be addressed through further specific design, conditions of consent, and monitoring.

4.11 Statement of activities involved in the project that are prohibited activities (s13(4)(i))

Subdivision of the subject Titles is a Prohibited Activity under both Waikato District Plans pursuant to **Rule 25.5(e)** and **SUB-R40 Prohibited Subdivision** as all of the Titles subject to the proposal have Title issue dates post December 1997 and contain high-class soil with more than one additional Lot being proposed to be created from each parent Title.

The context of this prohibited activity status is to protect the Waikato District's high-class land resource from repeated subdivision within individual land holdings, hence the December 1997 Title issue cut-off date. Given the unique nature of the proposal, it is considered that the proposed subdivision of the site is acceptable when considering the context and intent of the prohibited activity status.

5 PERSONS AFFECTED

5.1 Persons and groups the applicant considers likely to be affected (S13(4)(j))

Persons and groups likely to be affected by the project are identified as follows:

(i) Relevant local authorities

- Waikato District Council
- Waikato Regional Council
- Waipa District Council

(ii) Iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements

The following iwi/hapū have been identified to be consulted with in accordance with s13(4)(k) of the Act:

- Waikato Tainui
- Ngāti Hauā
- Ngāti Koroki Kahukura

(iii) Other relevant iwi authorities

The following iwi/hapū have been identified to be consulted with in accordance with s13(4)(k) of the Act:

- Waikato Tainui
- Ngāti Hauā
- Ngāti Koroki Kahukura

There are no other relevant iwi authorities relevant to this section other than those identified above.

(iv) Relevant Treaty settlement entities

- Ngāti Hauā hapū.

(v) Relevant protected customary rights groups and customary marine title groups

Not applicable to this proposal as the site is located outside of a marine and coastal area.

(vi) Ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou.

Not applicable to this proposal as the site is not within the Rohe of Ngāti Porou

(vii) Relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011.

Not applicable to this proposal as the site is located outside of a marine and coastal area.

(viii) Persons with a registered interest in land that may need to be acquired under the Public Works Act 1981.

There are no person with a registered interest in land that may need to be acquired under the Public Works Act 1981.

5.2 Consultation undertaken (S13(4)(k))

The consultation undertaken for the purposes of Section 11 of the Fast-track Act, along with any other consultation undertaken on the project with the individuals and groups referred to in s13(4)(j), is detailed in a Consultation Record attached as **Appendix P**.

The parties identified in Section 11 of the FTAA (including amendments to Section 11 made under the FTA Amendment Act 2025) have been notified in writing more than 20 working days prior to lodging the referral application

A comprehensive plan to ensure neighbourhood and stakeholder engagement was implemented from November 2025 and is summarised below.

- Identification of affected persons (particularly those in the surrounding neighbourhood) and direct efforts to communicate with them.
- Meetings with elected members and senior officials from local Territorial Authorities and the Waikato Regional Council as specified in Section 11(1)(b)(i)
- Engagement with representatives of Ngāti Hauā, Ngāti Koroki Kahukura and Waikato Tainui as local iwi and hapū as specified in Section 11(1)(b)(ii).
- Meetings with NZTA, Sport Waikato, DOC, Heritage NZ, local MPs, Te Awa Cycleway Board.
- Meetings with the Tamahere Community Committee.
- Two community open days.
- Establishment and meetings with a Neighbourhood Liaison Group.
- Creation of a WTR Greenfields website.

Hand delivered letter drops around the site and emails to a growing community database were used to inform of project activity and progress.

These actions will continue as the project progresses.

5.2.1 How consultation has informed the project s13(4)(k)(ii)

As a result of consultation undertaken in Section 5.2 above, feedback was consistent across the following areas:

- traffic (including on-site parking)
- water supply and effects on surrounding properties
- construction effects
- lighting
- noise.

A detailed summary of this feedback is provided as part of the consultation summary attached as **Appendix P**. As much of this feedback has been provided in a general sense and is unable to be addressed at the referral stage, this feedback will be considered and incorporated into the detailed design of the project at substantive stage and shared with the community through further engagement.

Neighbours Liaison Group

As part of consultation with the Neighbours Liaison Group which was established to represent the adjoining residents of the site, detailed feedback was provided in the form of a summary document, which is attached as **Appendix P**.

- Concern was raised regarding the location of the trainer / heavy vehicle entrance from Duncan Road. As a response, this access has been shifted further south in line with feedback received.
- Further issues raised highlight the need for careful planning, transparent communication, and proactive mitigation measures to address traffic, environmental, and infrastructure challenges.

Ongoing engagement with this group and the wider community will be undertaken to address this feedback as the project progresses.

5.3 Any Treaty settlements that apply to the project area and a summary of the relevant principles and provisions in those settlements (S13(4)(l))

The site is within the Ngāti Hauā Rohe, which is subject to a recent finalised treaty settlement (Te Pua o Te Riri Kore).

Key principles of this settlement include the first right of refusal over a number of Crown properties within the Rohe

Given only existing Crown assets are subject to the settlement, the application site is unaffected.

5.4 Processes already undertaken under the Public Works Act 1981 (S13(4)(m))

There have been no processes that have already been undertaken under the Public Works Act 1981.

5.5 Any relevant principles or provisions in the Nga Rohe Moana o Nga Hapu o Ngāti Porou Act 2019 (S13(4)(o))

The site is not located within the Ngāti Porou Rohe, therefore there are no principles or provisions of relevance to the proposal.

5.6 Information identifying the parcels of Māori Land, Marae and identified Wahi Tapu within the Project Area (S13(4)(n))

The project area does not contain any parcels of Māori Land or Marae.

As discussed in Section 4.8.7 above, the site contains a series of identified borrow pits which are considered to be Wāhi Tapu.

It is proposed to apply for an archaeological authority from Heritage NZ to partially destroy this site, subject to ongoing consultation with Mana Whenua.

5.7 Whether determination under section 23 is sought (S13(4)(p))

No determination under s23 is sought under this application.

5.8 Whether determination under section 24(2) is sought (S13(4)(q))

No determination under s24(2) is sought under this application.

5.9 Whether determination under section 24(4) is sought (S13(4)(r))

No determination under s24(4) is sought under this application.

6 WHAT IS REQUIRED TO COMPLETE THE PROJECT

6.1 A description of the applicant's legal interest (if any) in the land (S13(4)(s))

The applicant's legal interest in the subject land is subject to conditional sale and purchase agreements with the current landowners, which is dependent on approval of the project through both the referral and substantive application processes.

In regard to the property at 644 Pencarrow Road, while an agreement is not currently in place to purchase this property, a sale and purchase agreement will be reached if the property is to be included in the development of the Hub.

In stating this, if the property at 644 Pencarrow Road is unable to be acquired, this will not affect the ability of the applicant to deliver the project.

6.2 Consents, certificates, designations, concessions and other legal authorisations (other than contractual authorisations or the proposed approvals) (S13(4)(t))

No other consents, certificates, designations, concessions, and other legal authorisations are needed to authorise the project, other than those applied for under this consent application.

7 OTHER MATTERS

7.1 If any activities in the project, or similar activities, have been part of an application or decision under a specified act (s13(4)(u))

No activities within the Hub have been subject to an application or decision under a specified act.

As per the date of this application, there have been no previous applications made for a greenfield racing Hub.

7.2 A description of whether and how the project would be affected by climate change and natural hazards (s13(4)(v))

The Hub has been designed to consider potential effects of climate change and natural hazards, which is outlined in the Civil Engineering Assessment and Flood Modelling Assessment attached to the application as **Appendix E**.

The stormwater and flooding philosophy considers the effects of climate change via the following measures:

- The post-development flood modelling of flood depths and velocities will, as indicated above, use climate change adjusted rainfall intensities to ensure that onsite flooding accounts for climate change.
- The final sizing of the stormwater attenuation ponds will use historical rainfall for the existing runoff and climate change adjusted rainfall for the post-development runoff. This will ensure that the ponds will restrict downstream outflow to the historical existing outflow, not just the existing situation under a climate change adjusted scenario. This ensures the management plan not only mitigates the impact of the site on the downstream, but the impact of climate change.

Therefore, the proposal addresses climate change and natural hazard risks in a practical and effective way through incorporation of climate change considerations into the design.

7.3 If the referral application is lodged by more than one person (S13(4)(w))

The referral application is proposed to be lodged by WTR who will hold all approvals applied for as part of the consent application.

7.4 A summary of compliance or enforcement actions (if any) (S13(4)(x))

No compliance or enforcement actions have been taken against the applicant.

8 MATTERS RELATING TO SPECIFIC PROPOSED APPROVALS (S13(4)(Y)(I))

8.1 An assessment of the project against statutory documents (Schedule 5 Clause 2(1)(a))

The proposal is assessed against the relevant National Environmental Standards and National Policy Statements in the below section in accordance with Schedule 5 of the Act.

8.2 National environmental standards

8.2.1 National environmental standards for air quality (NES-AQ)

The National Environmental Standards for Air Quality sets standards to guarantee a minimum level of health protection for people living in New Zealand.

No specific consents relating to this standard are required for the Hub, however the potential for effects on air quality in relation to the Hub relate primarily to dust during the construction phase.

Measures are proposed to manage potential effects through preparation of the Construction Management Plan and an Erosion and Sediment Control Plan.

As such, ambient air quality will be maintained once the development is constructed.

8.2.2 National environmental standards for freshwater (NES-F)

The National Environmental Standard for Freshwater regulations set standards to regulate activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the project are provisions which prohibit works in and around natural wetlands and works affecting rivers and streams.

The identified natural wetland within the site will be enhanced as part of the proposed rehabilitation of the Kahikatea stand.

As per the water classification memo prepared by Ecology New Zealand and attached to this application within the ecological assessment as **Appendix L**, the drainage network within the site is considered to be an artificial watercourse, which has been agreed with by Waikato Regional Council.

Therefore, no consents are required under the NES-F.

8.2.3 National environmental standards for assessing and managing contaminants in soil to protect human health (NES-CS)

The NES-CS apply when a person wants to undertake an activity described in regulations 5(2) to 5(6) on a 'piece of land' described in regulation 5(7) or 5(8).

As part of the Preliminary Site Investigation (attached as **Appendix F**), several HAIL activities were identified on the site.

A Discretionary Activity Consent is required under the NES-CS as HAIL activities have been identified on-site but the risk to human health has not been quantified.

It is intended to prepare a Detailed Site Investigation (DSI) and Contaminated Site Management Plan (CSMP) to support the Substantive Application if the project is successfully referred.

8.3 National policy statements

The following national policy statements are considered relevant to the proposal.

8.3.1 National policy statement for freshwater (NPS-FW)

The requirements of the NPS-FM include:

- managing freshwater in a way that 'gives effect' to Te Mana o Te Wai;
- improving degraded waterbodies, and maintaining or improving all others; and
- avoiding any further loss or degradation of wetlands and streams, map existing wetlands, and encourage their restoration.

It is considered that the proposal is consistent with the NPS-FM objectives and policies.

The protection and enhancement of the health and well-being of waterbodies, streams and freshwater ecosystems have been considered through the design of the development and proposed enhancement of the natural wetland within the Kahikatea stand, subject to preparation of an EMP.

8.3.2 National policy statement for highly productive land (NPS-HPL)

The National Policy Statement for Highly Productive Land 2022 ('NPS-HPL') ensures the availability of New Zealand's high-class soil for food and fibre production, both now and for future generations.

It is noted the NPS-HPL came into effect on 17 October 2022 and was amended in August 2024.

The Pencarrow site is classified as productive land, as it is mapped as mostly Land Use Capability ('LUC') 1s 1, 2s 1 and 2w 3. There is an area of 4e 2 soil along the Pencarrow Road boundary of the site which is not high-class land.

The objective of the NPS-HPL is to protect highly productive land for use in land-based primary production, however, there are exceptions to this if circumstances are met.

As a Tier 1 territorial authority, under Clause 3.6(1), Waikato District Council may allow urban rezoning of highly productive land if:

- (a) the urban rezoning is required to provide sufficient development capacity to meet demand for housing or business land to give effect to the National Policy Statement on Urban Development 2020; and*
- (b) there are no other reasonably practicable and feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment; and*
- (c) the environmental, social, cultural and economic benefits of rezoning outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.*

While the proposal will not result in the urban re-zoning of land per se, it is considered that the proposal is consistent with the intent of the above criteria for the following reasons:

- The development of the subject site will reduce the need to re-zone further productive rural land in the wider region as the retirement of the three existing thoroughbred racing facilities in Hamilton, Cambridge and Te Awamutu (Waipa Racecourse) alongside the existing harness track in Cambridge frees up significant areas of land for residential development given these sites are already zoned for residential / urban use. The release of this land for urban use will contribute to providing sufficient development capacity to meet urban land demand in Hamilton, Cambridge and Te Awamutu.
- Property Economics Ltd have prepared an Economic Impact Assessment (EIA) that identifies that the proposal can achieve social and economic benefits that significantly outweigh the long-term social and economic costs associated with the loss of highly productive land, which have been outlined in section 4.3 of this report.
- It is considered through detailed design, particularly with cultural and ecological input, the proposal can provide environmental, social, cultural and economic benefits that significantly outweigh the long-term environmental, social, cultural and economic costs associated with the loss of the productive capacity of highly productive land, while supporting a predominately rural based industry.

Under Clause 3.8, Waikato District Council are directed to avoid the subdivision of highly productive land (HPL) unless the productive capacity of HPL is retained, the subdivision is on specified Māori land or is for specified infrastructure. While the proposal technically results in a loss of productive capacity of HPL through the construction of buildings and other land uses associated with the proposal, overall, the proposal supports a rural based industry that is a significant contributor to the Waikato economy, and the wider national economy.

Clause 3.9 requires Waikato District Council to avoid development of HPL that is not for land based primary production unless protection, maintenance, restoration or enhancement of indigenous biodiversity is achieved.

Further to this, territorial authorities must also ensure that any use or development on highly productive land: minimises or mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land in their district; and avoids if possible, or otherwise mitigates, any actual or potential reverse sensitivity effects on land-based primary production activities from the use or development.

It is considered that while the proposal provides for the restoration and enhancement of indigenous biodiversity via the rehabilitation of the Kahikatea stand and mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land. This is achieved via the release of 159.5ha of land zoned for urban development within current urban limits, which avoids the need to rezone other areas of HPL for urban use.

Under Clause 3.10, Waikato District Council may allow highly productive land to be subdivided, used or developed if satisfied that: there are permanent or long-term constraints on the land that mean the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years; and the subdivision, use, or development:

- Avoids any significant loss (either individually or cumulatively) of productive capacity of highly productive land in the district; and
- Avoids the fragmentation of large and geographically cohesive areas of highly productive land; and
- Avoids if possible, or otherwise mitigates, any potential reverse sensitivity effects on surrounding land-based primary production from the subdivision, use, or development; and
- The environmental, social, cultural and economic benefits of the subdivision, use, or development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.

While there are no long term constraints on the land, as discussed above, the proposal can avoid any significant cumulative loss of HPL via the release of urban zoned land for development that reduces the need to rezone further areas of HPL and can achieve social and economic benefits that significantly outweigh the long-term social and economic costs associated with the loss of highly productive land, which have been outlined in section 4.3 of this report.

It is considered that the proposal does not fragment a large geographically cohesive area of HPL as the site is currently in different ownership and is surrounded by rural residential development and the Waikato Expressway, which has already fragmented the surrounding environment.

Overall, while the proposal does not retain the productive capacity of highly productive land to the intent of the NPS, the proposal does provide a wide variety of other benefits across environmental, social, cultural and economic sectors that significantly outweigh the long-term costs of the loss of HPL for primary production, while supporting a rural based industry.

8.3.3 National policy statement for indigenous biodiversity (NPS-IB)

The National Policy Statement for Indigenous Biodiversity ('NPS-IB') ensures the protection, maintenance and restoration of New Zealand's most threatened indigenous species.

It is considered that the project is consistent with the relevant objectives and policies of the NPS-IB for the following reasons.

- This development seeks to maintain and enhance indigenous biodiversity through rehabilitation and protection of the Kahikatea stand and wetland within the site as this area provides foraging and commuting habitat and may provide potential roosting habitat for long-tailed bats and therefore triggers criterion C-(6)(a), as it provides habitat for an indigenous species that is listed as Threatened or At Risk (declining) in the New Zealand Threat Classification System lists, by providing foraging, commuting and possibly roosting, habitat for long-tailed bats (attributes of rarity and distinctiveness). The wetland area identified within the Kahikatea stand is also proposed to be retained and protected.

- Engagement has occurred with mana whenua to recognise and provide for the management of indigenous biodiversity through input into the preparation of the Ecological Management Plan.
- Ngāti Haua and Ngāti Koroki Kahukura are yet to determine their positions of support of this application via Cultural Impact Assessments.
- The development will include a variety of indigenous plants and seeks to enhance indigenous biodiversity, which will promote peoples' wellbeing and allow current and future communities to connect with nature.

Based on the assessment above, it is considered that the Hub is consistent with the NPS-IB.

8.3.4 National policy statement for urban development (NPS-UD)

The National Policy Statement on Urban Development 2020 ('NPS-UD') ensures New Zealand's towns and cities are well-functioning urban environments that meet the needs of the countries communities.

It removes restrictive barriers to development to allow growth 'up' and 'out' in locations that have good access to existing services, public transport networks and infrastructure. It is noted that this legislation was amended in accordance with section 77S(1) of the RMA and notified on 11 May 2022.

The NPS-UD enables the development of land and infrastructure for urban use while recognising the importance of well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing.

While the proposal does not specifically result in 'urban' development, it is considered that the project is consistent with the relevant objectives and policies of the NPS-UD and will contribute to a well-functioning urban environment for the following reasons.

- The current Waipa (33.9ha) and Cambridge (60.84ha) thoroughbred racing facilities are zoned for Medium Density Residential development. The establishment of the Hub allows these two sites to be used for residential development in accordance with the underlying District Plan zoning. The Cambridge harness track (14.8ha) is also zoned for Medium Density Residential development.

The location of these two sites on the fringes of existing urban areas ensures that these sites have good accessibility for future residents to services, activities and amenity without the need to rezone large areas of rural land. In addition, it encourages and promotes active transport through a range of walking and cycling options to housing, employment, schools, community services and open spaces.

- The current Te Rapa racecourse (approx. 50ha) in Hamilton has recently completed a private plan change to re-zone 6ha of land for residential purposes. In addition to this re-zoned area, the remaining land will be able to be used for urban development in the future through the creation of a new greenfield site which allows for Te Rapa to be retired from racing uses. The proposal results in approximately 159.5ha of land that is within existing urban limits to be used for residential development, without rezoning further rural land.

The Hub enables people to provide for their social, economic and cultural wellbeing, with the proposal offering services, significant employment opportunities and community facilities, and the Kahikatea stand offering natural and open spaces, and cultural wayfinding.

- The Hub takes into consideration climate change, particularly through utilising climate change adjusted data in addressing the management of flooding hazards via stormwater management.

The proposal also incorporates measures to support the reduction of greenhouse gas emissions through consolidation of four existing sites into one, therefore reducing inter-venue traffic for staff and horses as well as event traffic. The proposal also improves transport efficiency through purpose designed access arrangements and close access to the regional transport network.

- There is also potential for the development to support a transition to a lower emissions transport system through links to active transport infrastructure and enabling travel demand measures that are event based such as ride sharing and charter buses.
- The Hub has been located in a strategic location with access to regional transport links and is strongly aligned with delivering a well-functioning urban environment that reduces climate change through providing infrastructure and services in an integrated manner.

Based on the assessment above, it is considered that the Hub is consistent with the objective and policies of the NPS-UD.

8.3.5 National policy statement for natural hazards (NPS-NH)

The NPS-NH came into force in January 2026 and applies to the following natural hazards:

- flooding.
- landslips.
- coastal erosion.
- coastal inundation.
- active faults.
- liquefaction; and
- tsunami.

It is considered that the site is not subject to any significant risk of landslips, coastal erosion or inundation, active faults or tsunami.

As outlined in the provided flooding assessment (**Appendix E**), it is considered that the risk of flooding occurring on the site is currently medium, which can be mitigated to low through specific design.

The geotechnical report (**Appendix P**) concludes that the risk of liquefaction occurring on-site is low to medium risk, with this risk being able to be mitigated through specific foundation design and ground remediation prior to construction.

Based on the assessment above and in the relevant technical assessments, it is considered that the Hub is consistent with the objective and policies of the NPS-NH.

9 CONCLUSION

Having undertaken a high-level planning assessment, it is considered that there are no planning-related reasons why the WTR Greenfield Racing Hub could not proceed under the Fast-Track Approvals Act 2024.

Through design and technical input, the Hub can positively impact the racing industry and the wider community, while being able to sufficiently mitigate potential adverse effects on the environment.

If the referral application is successful, a full and comprehensive Assessment of Environmental Effects will be undertaken as part of the Substantive Application.