

Planning Assessment

JOB NUMBER: 23-1883

Waikato Greenfield Racing Hub
PROJECT

Waikato Thoroughbred Racing Inc
CLIENT

REVISION TYPE – REV 1
1 October 2026

Planning Report

Project No: 23-1883

Project Name: Waikato Greenfield Racing Hub

Address: Pencarrow Road, Tamahere, Hamilton



Prepared for: Waikato Thoroughbred Racing Incorporated

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Revision	Date	Status	Authorised by:
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1. INTRODUCTION

Project Background

This report has been prepared to support a Substantive Application lodged on behalf of Waikato Thoroughbred Racing Incorporated (the Applicant) for the proposed Waikato Greenfield Racing Hub ("the Hub").

The Hub seeks to establish a unique, world-class greenfield racing precinct 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 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 ($147.1m at an 8% NPV, or $173.7m under the earlier-start scenario for the Waikato – including direct expenditure of over $400m over the eight-year development period.

A key driver for the Hub is the consolidation of four existing racecourse facilities: Te Rapa, Waipaa 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 precinct 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 Hub'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 senior 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.

During the development of the Hub, the applicant and its representatives have undertaken consultation with iwi authorities, local Councils, IAWAI, the New Zealand Transport Agency (NZTA), Heritage NZ, Department of Conservation (DoC) and the local community.

The application has been refined where possible in response to this consultation and feedback.

As a referred project, this Substantive Application has been made in accordance with s42 of the Fast-track Approvals Act 2024 (FTAA) and approval is sought for Resource Consents that would otherwise be sought under the RMA.

Application Structure

The overall development consists of five precincts that contain the various land uses proposed within the site.

The information and assessment of effects provide a detailed assessment for each part of the development. The separate parts include a comprehensive description of that precinct, reasons for consent, and a summary of the technical assessments undertaken.

The application contains an evaluation of relevant policy documents, standards and plan provisions, along with proposed mitigation measures, monitoring and the proposed conditions of consent, to ensure that potential effects are appropriately managed.

Supporting technical reports are attached as appendices and are referred to throughout parts 2-6.

- **Appendix A:** WTR Letter
- **Appendix B:** Economic Assessment
- **Appendix C:** Application Feedback and Responses
- **Appendix CA:** Letters of Support
- **Appendix D:** Consultation Summary
- **Appendix E:** Records of Title and Legal Interests
- **Appendix F:** Integrated Transport Assessment
- **Appendix FA:** Design Memorandum
- **Appendix G:** Geotechnical Assessment Report
- **Appendix GA:** Hydrogeology Assessment
- **Appendix H:** Ecological Impact Assessment
- **Appendix HA:** Ecological Management Plan
- **Appendix HB:** Fish Management Plan
- **Appendix HC:** Bat Management Plan
- **Appendix HD:** Lizard Management Plan
- **Appendix I:** Civil Engineering Design Report
- **Appendix IA** Civil Drawings
- **Appendix J:** Preliminary Site Investigation
- **Appendix JA:** Contaminated Site Management Plan
- **Appendix JB:** Acid Sulfate Management Plan
- **Appendix K:** Cultural Values Assessment
- **Appendix L:** Archaeological Assessment
- **Appendix LA:** Archaeological Management Plan
- **Appendix LB:** Research and Mitigation Strategy
- **Appendix M:** Owners and Occupiers of Adjacent Land
- **Appendix N:** Architectural Masterplan and Drawings
- **Appendix NA:** Subdivision Scheme Plan
- **Appendix NB:** Phasing Plan
- **Appendix O:** Urban Design Assessment
- **Appendix P:** Acoustic Report
- **Appendix Q:** Management Plans
- **Appendix QA:** Daily Track Maintenance and Training Operations Plan (Thoroughbred)
- **Appendix QB:** Erosion and Sediment Control Plan
- **Appendix QC:** Event Traffic Management Plan
- **Appendix QD:** Construction Traffic Management Plan
- **Appendix QE:** Raceday Operations Plan (Thoroughbred)
- **Appendix QF:** Raceday Operations Plan (Harness)
- **Appendix QG:** Daily Track Maintenance and Training Operations Plan (Harness)
- **Appendix QH:** Construction Management Plan
- **Appendix R:** Lighting Assessment
- **Appendix S:** Preliminary Electrical Services Report
- **Appendix T:** Draft Conditions
- **Appendix TA:** Draft Archaeological Authority Conditions
- **Appendix TB:** Racing Precinct Draft Conditions
- **Appendix TC:** Senior Living Precinct Draft Conditions
- **Appendix TD:** Blood Stock Precinct Draft Conditions
- **Appendix TE:** Commercial Precinct Draft Conditions
- **Appendix TF:** Subdivision Draft Conditions
- **Appendix TG:** NESCS Draft Conditions
- **Appendix TH:** Ground water Take Draft Conditions
- **Appendix TI:** Surface Water Take Draft Conditions
- **Appendix U:** Waikato District and Regional Plan
- **Appendix UA:** Waikato District and Regional Plan Rules Assessment
- **Appendix UB:** Waikato District and Regional Plan Objectives and Policies Assessment
- **Appendix V:** Notice of Decision on application for referral of the Hub under the FTAA 2024
- **Appendix W:** Memorandum of Understanding

- **Appendix X:** Landscape Affects Assessment
- **Appendix XA:** Assessment of Landscape Effects Memorandum
- **Appendix Y:** Flooding Assessment
- **Appendix Z:** Productivity Assessment

2. PROJECT BACKGROUND

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), Waipaa 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, equating to 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

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 be 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 Waikato Greenfield Racing 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.

The applicant has prepared a cover letter (**Appendix A)** outlining the integrated nature of the Hub, which is dependent on the integrated development of all four precincts, each of which performs a distinct but interdependent role within the overall Hub.

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.

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, senior living development, equestrian activities, commercial activities, carparking, access (and all associated transport infrastructure), commercial equine support services, landscaping and vegetation planting/maintenance.

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.

Scope

In accordance with Section 46 of the FTAA this section confirms that the Substantive Application remains complete and within scope.

The Masterplan has been subject to various updates since acceptance of the Referral Application in relation to the layout of the site. These updates do not affect the overall purpose, scale, or character of the Hub.

The Hub was accepted as a referred project with the following project description.

- Thoroughbred racing and associated activities including:
    - a racing facility with a main track and 1200m starting chutes
    - facilities for race days, industry functions, and events
    - a thoroughbred training track
    - a warmup track
    - on-site stables and yards for trainers' allotments.
- A bloodstock office and sales business across approximately 63,200m^2 with barns, yarding, sales pavilion and administration.
- An operations and events building across approximately 2,041m^2 with a parade ring and tie up.
- Harness racing including:
    - a harness racing and training track
    - facilities for race days, industry functions and events
    - on-site stables and yard for trainers' allotments.
- Other land uses including:
    - a retirement residential development with approximately 70-80 single storey villas, approximately 200 attached units, and a community centre
    - a residential precinct with up to approximately 90 lots
    - an equestrian events ring

- facilities to host temporary events
- a village centre including a bar, café and other small scale commercial activity
- parking areas for up to approximately 2,030 vehicles
- commercial equine support services
- rehabilitation of the existing Kahikatea stand within the Hub site
- all associated infrastructure, construction, subdivision and earthworks including potential roading upgrades.

Following acceptance of the Hub as a referred project, and in response to feedback from adjoining neighbours, the following amendments have been made to the layout of the Masterplan.

- Re-orientation of the proposed racetracks in response to racing requirements.
- The thoroughbred racing track has changed shape and is now located further north within the site.
- The harness racing track has been re-oriented to run parallel with Pencarrow Road.
- The thoroughbred training track is now located in the southern portion of the site.
- The property at 644 Pencarrow Road is no longer included.

This subsequently has resulted in the following layout changes.

- Combining the equine commercial support and commercial development precinct and locating this entirely within the northwestern corner of the site - with the exception of two equine support buildings being relocated adjacent to the thoroughbred training complex.
- Reducing the size of the main events building.
- Locating the senior living precinct in the southwestern corner of the site.
- Locating the thoroughbred training facilities entirely within the northeastern corner of the site.
- Amending the layout of the residential lifestyle block development to include 34 Lots rather than 90 as allowed for in the Referral Application.
- Changing the internal and external vehicle access, with the main change being the main entrances to the site now being located on Pencarrow Road.

The following changes have also occurred in relation to precinct areas as a consequence of the changes to the site layout.

<u>Subdivision</u>

- A minor boundary relocation is proposed between Section 2 SO 547526 [RT 1027516] (which is part of the subject site) and Lot 2 DP 404891 [RT 417116] [101 Hooker Road] to amalgamate approximately 3,000 m^2 of land with this property.

<u>Commercial Areas</u>

- As discussed above, the commercial area was split into two areas 26,500m^2 and 15,000m^2 in size. The combined gross floor areas for these areas were 28,000m^2. The latest Masterplan has resulted in a total area of 31,700m^2 and gross floor area of 17,600m^2 which has reduced from the Referral Application.

Thoroughbred Training Complex

- The Referral Application Masterplan showed the training complex being located over an area of 150,000m^2 with a gross floor area of 100,000m^2. The Substantive Application masterplan has provided for a training complex over an area of 100,00m^2 with a gross floor area of 32,600m^2 While the areas have decreased, the number of horses stabled on site has not changed from the Referral Application.

Senior Living Precinct

- The Referral Application allowed for approximately 70-80 single storey villas, approximately 200 attached units, and a community centre. The updated Masterplan has allowed for 90 villas, 40 units and a community centre with an associated 160 bed care facility. This is consistent with the scope of the referral application.

These changes represent refinements to internal layouts and allocation of space and do not materially increase the footprint, scale, intensity or environmental effects of the Hub outside of what could be considered within general accordance.

Wildlife Approval

- As part of the referral application, it was intended to apply for a wildlife permit for authorisation to relocate Lizards (if found and required). Further assessment undertaken has confirmed that the likelihood of lizard habitat being within the site is low and therefore a wildlife permit is not required and an accidental discovery protocol will be followed instead. This discovery protocol is outlined in the Lizard Management Plan attached to the application.

These effects have been recognised and addressed through the updated Masterplan and technical reports.

The Hub continues to fall within the parameters of section 46(2) of the FTAA, as the application encompasses all necessary approvals while maintaining the same overall purpose, scale, and character that formed the basis for acceptance as a referred Project.

Referral Application Project Feedback

Section 11 Feedback

As part of the referral application process, the following parties were invited to comment on the proposal.

Government Ministers

- Minister for Conservation, Māori Crown Relations, Māori Development, Whanau Ora and Associate Minister of Housing.
- Minister for Oceans and Fisheries, Regional Development, Resources and Associate Minister of Finance and Energy.
- Minister of Arts, Culture and Heritage.
- Minister of Finance, Economic Growth and Social Investment.
- Minister for Seniors, Customs and Associate Minister of Health, Immigration and Police.

Local Authorities

- Waikato District Council
- Waipa District Council
- Hamilton City Council

- Waikato Regional Council

Government Agencies

- New Zealand Transport Agency (NZTA)
- Pouhere Taonga Heritage New Zealand
- Department of Conservation

Iwi

- Waikato Tainui

Other Parties

- Waikato Regional Airport

Other Feedback

Significant consultation and engagement has occurred with both the wider Tamahere community and adjoining landowners which has been detailed in section 9 of this application. A summary of this feedback and how this has been addressed or informed the application is attached as **Appendix C.** A consultation summary is also attached as **Appendix D.**

3. STATEMENT OF EXPERIENCE

Josh Caddigan is a Senior Planner at BCD Group Limited, based in Hamilton.

I hold a Bachelor of Social Sciences (Environmental Planning) from the University of Waikato. I am an Associate member of the New Zealand Planning Institute and a member of the New Zealand Property Council.

I have seven years' experience as a resource management practitioner across both local government and the private sectors, working primarily in preparing, lodging, and previously processing resource consents within the local government environment.

Preparing resource consents has been my primary role in the last four years as a consultant planner. My experience in resource consenting spans a wide range of land-use and subdivision activities across multiple zones, primarily within the wider Waikato and Bay of Plenty Region.

I have visited the subject site and am familiar with the site and the surrounding environment.

Although this application is not before the Environment Court, I can confirm that I have read and act in accordance with the New Zealand Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023.

The matters addressed in this brief of evidence are within my area of expertise, with the exception of where I confirm that I am relying on the evidence or assessment of another person. I have not omitted to consider material facts known to me that might alter or detract from my opinions expressed in this brief of evidence.

I have specified where my opinion is based on limited or partial information, and I have identified any assumptions I have made in forming my opinions.

4. SUBJECT SITE AND APPLICANT DETAILS

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: [redacted]

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]**

Site Area: RT 632409: **37.6439ha**

RT 650205: **23.8694ha**

RT 650204: **18.5194ha**

RT 1027516: **69.6678ha**

RT SA 383/181: **14.212ha**

Overall Site Area: **163.9ha**

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]**

Records of Title and Legal Interests

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

#	Title Details and Address	Interests
1	Section 49 SO Plan 457609 RT 632409 *636 Pencarrow Road*	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*	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*	Nil
4	Section 2 SO 547526 RT 1027516 *38 Duncan Road and 37 Hooker Road*	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.

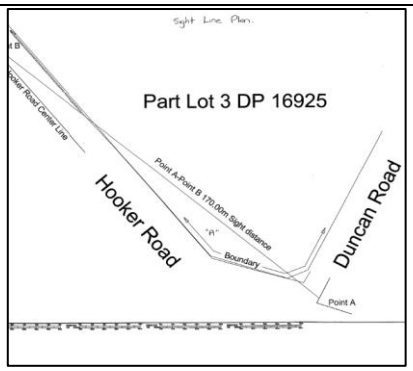
		
5	Lot 2 DP 16925 RT SA383/181 *90 Duncan Road*	Nil

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

The land covenant registered against RT 1027516 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.

Copies of the RTs and legal interests are attached as **Appendix E.**

Site Context

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 1** 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.

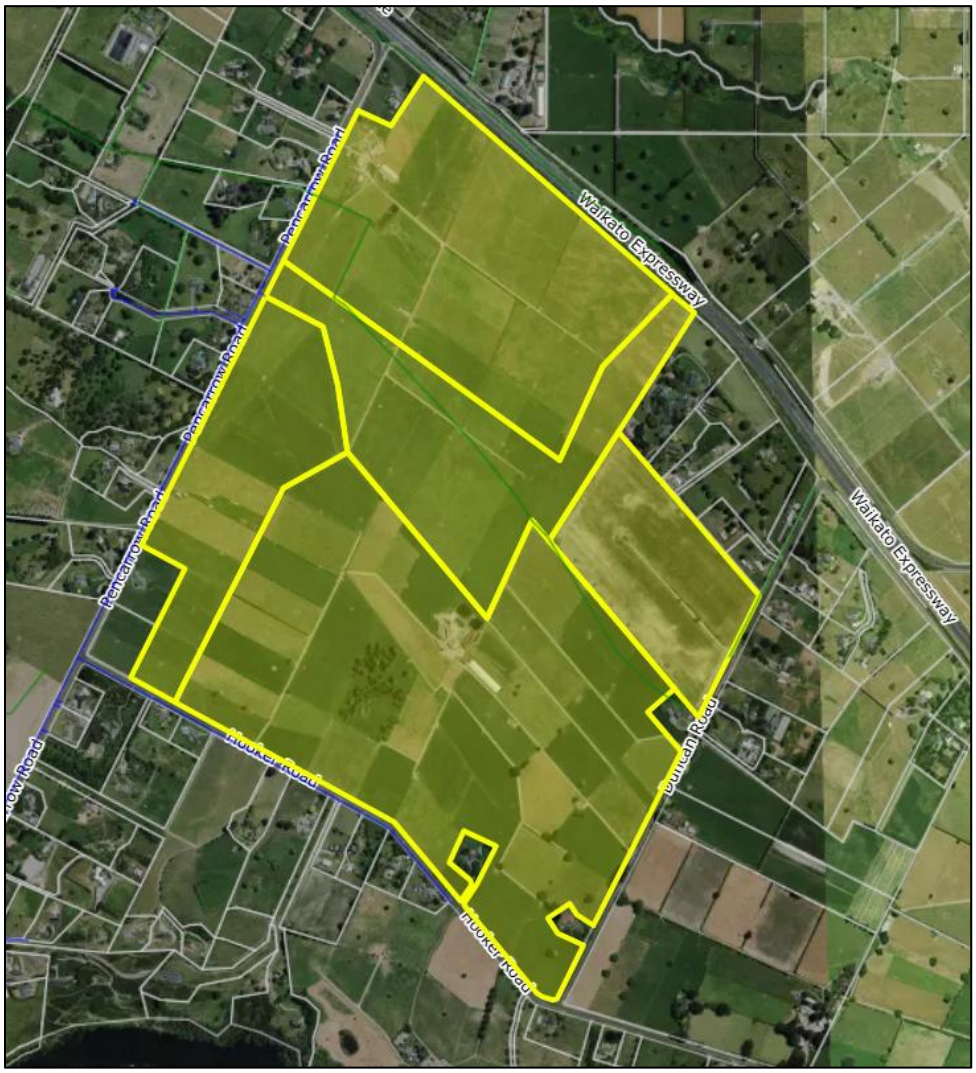


Figure 1: Enlarged Site Locality Image (site highlighted in yellow) Source: GRIP Maps.

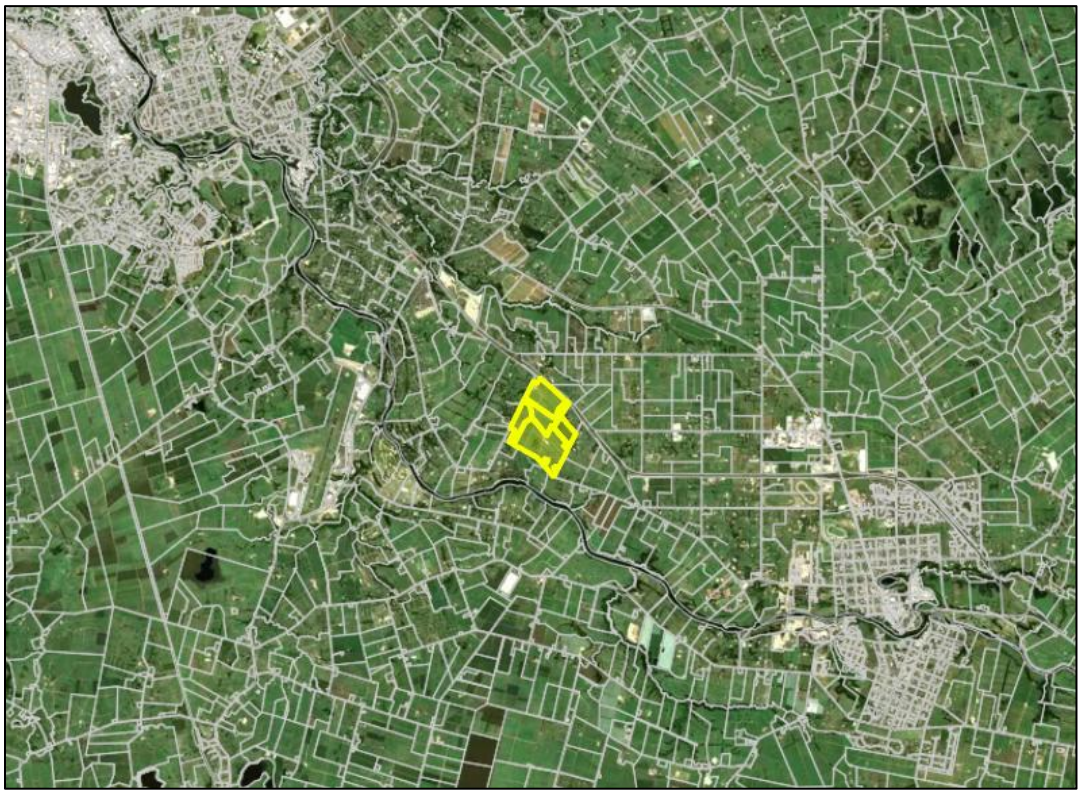


Figure 2: Wider Locality Plan (site highlighted in yellow) Source: GRIP Maps.

District Plan Zoning

The site is zoned General Rural under the Waikato District Plan – Operative in Part (WDP). All surrounding land is also located within the General Rural Zone. See **Figure 3** 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 WDP 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. No structures proposed as part of the Hub will breach this surface.

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

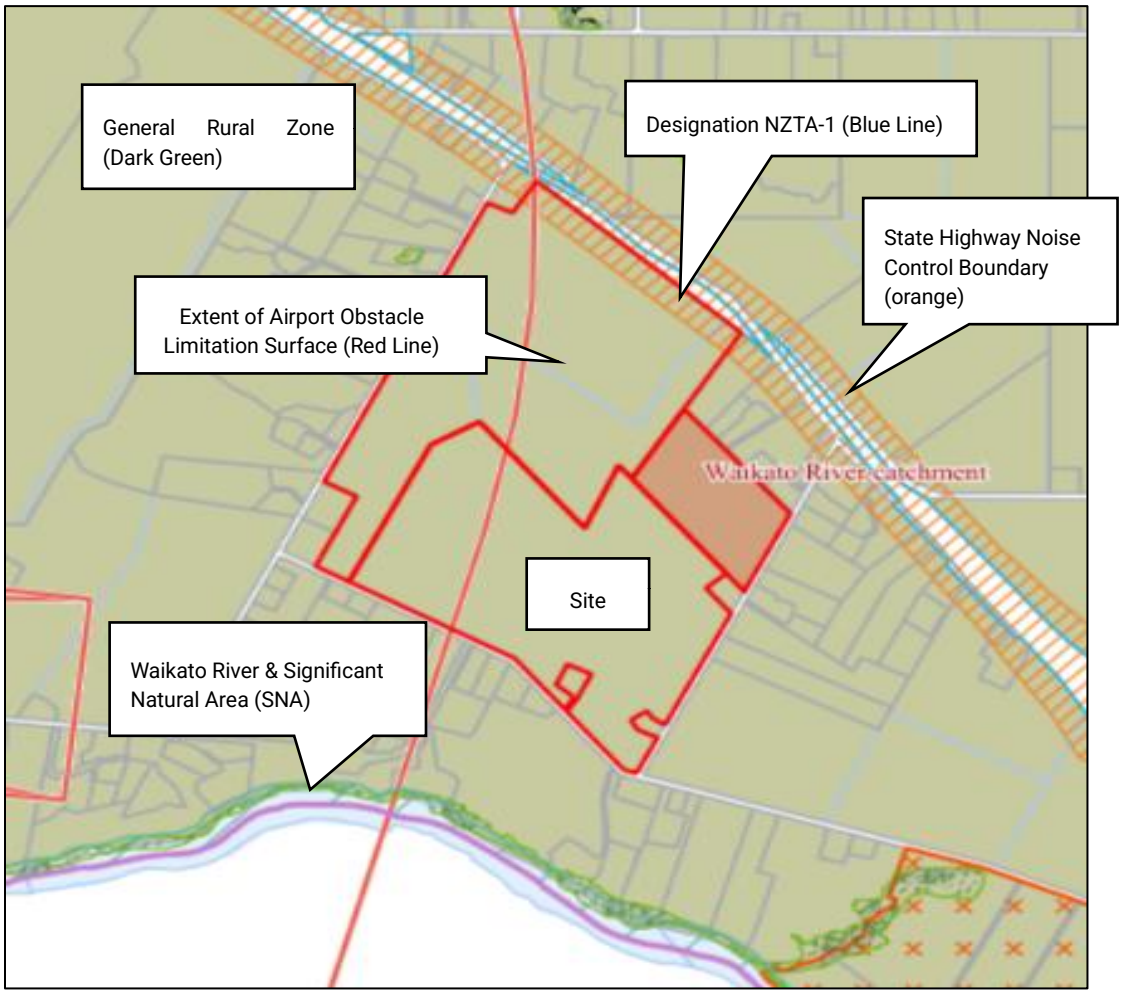


Figure 3: WDP Zoning and Features Map (Source: Waikato District Council Intramaps, retrieved 1 September 2026).

While the WDP is not fully operative due to live appeals relating to the Rural Lifestyle Zone and rural subdivision chapters, in terms of the subject site, this is now the dominant planning document in terms of this application.

Any corresponding rules in the Operative District Plan are treated as inoperative pursuant to Section 86F of the Resource Management Act 1991 (RMA).

Existing Land Use and Access

The site is currently in use as two working dairy farms in separate ownership. There are a number of existing vehicle entrances to the site from Pencarrow, Hooker and Duncan roads. An Integrated Transport Assessment (ITA) has been prepared which addresses the effects of the Hub on both the wider transport network and within the site. This is attached to the application as **Appendix F.**

Site Geology

A Geotechnical Assessment Report (GAR) has been prepared by BCD Group (BCD) and is attached to the application as **Appendix G.**

The GAR confirms that the underlying soils for the site consist of Hinuera Formation. This formation consists of volcanogenic gravel, sand and silt that can also contain pumice. Surface and subsurface peat or organic silt deposits can be present. There is distinct crossbedding throughout the formation, and soil conditions can be highly variable vertically and laterally.

Groundwater

The Wallbridge Gilbert Aztec (WGA) have prepared a technical assessment of hydrological effects (**Appendix GA**) because of the development of the Hub.

This memorandum assesses whether groundwater from a deep confined aquifer beneath the proposed Waikato Thoroughbred Racing development can provide sufficient water for racecourse irrigation, potable supply, stock water, and residential demand. Testing was undertaken on exploratory bore drilled to a depth of 120m.

The Hamilton Basin features a complex hydrogeology with multiple aquifers separated by low-permeability aquitards. The test bore targeted a deep confined aquifer, overlain by at least two significant fine-grained silt and clay layers.

These confining layers reduce groundwater interaction with surface water and other overlying shallower aquifers, making the bore a naturally protected water source.

Based on the testing undertaken, the groundwater resource appears capable of supplying 1,000 m^3/day, while drawdown impacts are generally manageable and largely confined to the deeper aquifer being pumped.

Vegetation

The site is flat with minimal vegetation present. Of note is a mature Kahikatea stand in the southern portion of the site, which has an area of approximately 0.95ha. There are a number of other native tree species interspersed within the stand.

Outside of this area, vegetation is limited to some exotic tree and hedgerows. The vegetation on-site is discussed in further detail in the ecological impact assessment attached as **Appendix H.**

Existing Infrastructure

There is no wastewater or stormwater reticulation available to the site. A Waikato District Council trickle feed reticulated water supply is available within Pencarrow and Hooker Roads.

The proposed infrastructure to service the Hub is outlined in the Civil Engineering Design Report (**Appendix I)**

Contamination

As part of the Preliminary Site Investigation (PSI) (attached as **Appendix J**) undertaken as part of the referral application, 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 A18.
- 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.

The site is therefore classified as a 'piece of land' under Regulation 5(7) of the National Environmental Standard for Contaminated Soils (NES-CS).

A Contaminated Site Management Plan (CSMP) has been prepared for the site and is attached as **Appendix JA**.

Ecology

An ecological impact assessment has been prepared by Awa Ecology to support the application (**Appendix H**). This report includes an assessment of both terrestrial and freshwater ecology within the site.

In terms of fauna and habitat, the site does not contain any high value habitat for threatened birds or lizards. Native birds observed on site were all considered 'Not Threatened', with no lizards detected during habitat surveys (accepting that through future monitoring that some may be found).

Bat surveys undertaken confirm that the site is used for commuting and foraging by long-tailed bats, predominantly within the Kahikatea stand. It is also noted that no roosts were found, although some trees within the stand presented as being roost potential.

In regard to freshwater ecology, a small natural wetland of approximately 25m^2 was identified within the Kahikatea stand. The artificial drainage network within the site is ephemeral and was assessed, however no fish or large invertebrates were captured during the fish survey undertaken.

The following management plans relating to ecological matters have been submitted with the application:

- **Appendix HA:** Ecological Management Plan (EMP)
- **Appendix HB:** Fish Management Plan (FMP)
- **Appendix HC:** Bat Management Plan (BMP)
- **Appendix HD:** Lizard Management Plan (LMP)

Wildlife

Lizards

At least 98 % of the site is intensively managed pasture with no lizard habitat. Hedgerows, buildings, road margins and most drain margins are also assessed as having nil likelihood of lizards. There are only two locations where lizards could possibly be present, and both rate as very low likelihood:

- The kahikatea stand. This could support arboreal geckos, but it is small, isolated by 800–1,000 m from other treeland, and has had no pest control.
- parts of the main stream/drain margins. Copper skinks could occur only where the margins carry wide,rank grass. This is about 5 % of the drain margin length.

Because the likelihood is so low, RMA Ecology concludes that a pre-clearance survey and a Wildlife Act authority are not required.

A Lizard accidental discovery response protocol consent condition has been proposed, which is included in the draft conditions.

Fish

Awa Ecology (who have prepared a number of the ecological assessments) hold an MPI special permit (Ref 820) to take and possess fish and aquatic life and relocate to a suitable habitat if required.

Therefore, no additional permits are required in relation to any fish found on-site. This is detailed in the Fish Management Plan (FMP).

Please see the EMP by Awa Ecology for further detail (**Appendix HA).** DoC have also been consulted regarding this matter, as outlined in the attached consultation summary (**Appendix D**).

Cultural Context

Cultural Values Assessments (CVAs) have been prepared by Ngaati Hauaa and Ngaati Korokii Kahukura as mana whenua of the subject site. Their rohe includes Tamahere and other places of historical and customary association.

Both Ngaati Haua and Ngaati Korokii Kahukura descend from the Tainui waka and maintain enduring relationships with Maungatautari through to the base of Taupiri Maunga, the Waikato River, Pohara and Maungatautari marae, and associated paa, kainga and mahinga kai.

The CVAs have been attached as **Appendix K.**

A memorandum of understanding (MoU) between the applicant, Ngaati Hauaa and Ngaati Korokii Kahukura has been prepared that establishes an ongoing relationship and provides a clear framework for engagement, collaboration, and shared long-term outcomes. This includes a commitment to ensuring any contaminated land identified within the site during the development of the site is disposed of to an appropriate location and not reused onsite as fill.

As part of the requirements of the MoU, a Cultural Management Plan (CMP) will prepared to guide cultural monitoring, ongoing engagement, and the protection of cultural values throughout the development. This will be required as a condition of consent.

Archaeology

The site contains an identified archaeological site (Ref S15/573) which is a Maaori horticultural site, notably containing seven borrow pits and an area of Māori horticultural soils over approximately 2.2ha, which is divided into a northern and southern portion by an existing dwelling and accessory building.

An Archaeological Assessment of the site has been undertaken and is attached to the application as **Appendix L**. Additionally, there is an Archaeological Management Plan and a Research and Mitigation Strategy for the Hub, which are attached as **Appendix LA** and **LB**, respectively.

Owners and Occupiers

In accordance with clause 5(1)(d) of Schedule 5 of the FTAA, the full names and addresses of the following are included as **Appendix M.**

(a) Each owner of the site and of land adjacent to the site

(b) Each occupier of the site and of land adjacent to the site whom the applicant is able to identify after reasonable inquiry.

5. PROPOSAL

This section of the application is a summary of the key elements of the proposal provided in accordance with clause 5(1)(a) of Schedule 5, clause 2 of Schedule 7 and clause 2 of Schedule 8 of the FTAA.

The extent of the Hub is shown on the drawings attached as **Appendix N** and **Figure 4** below.

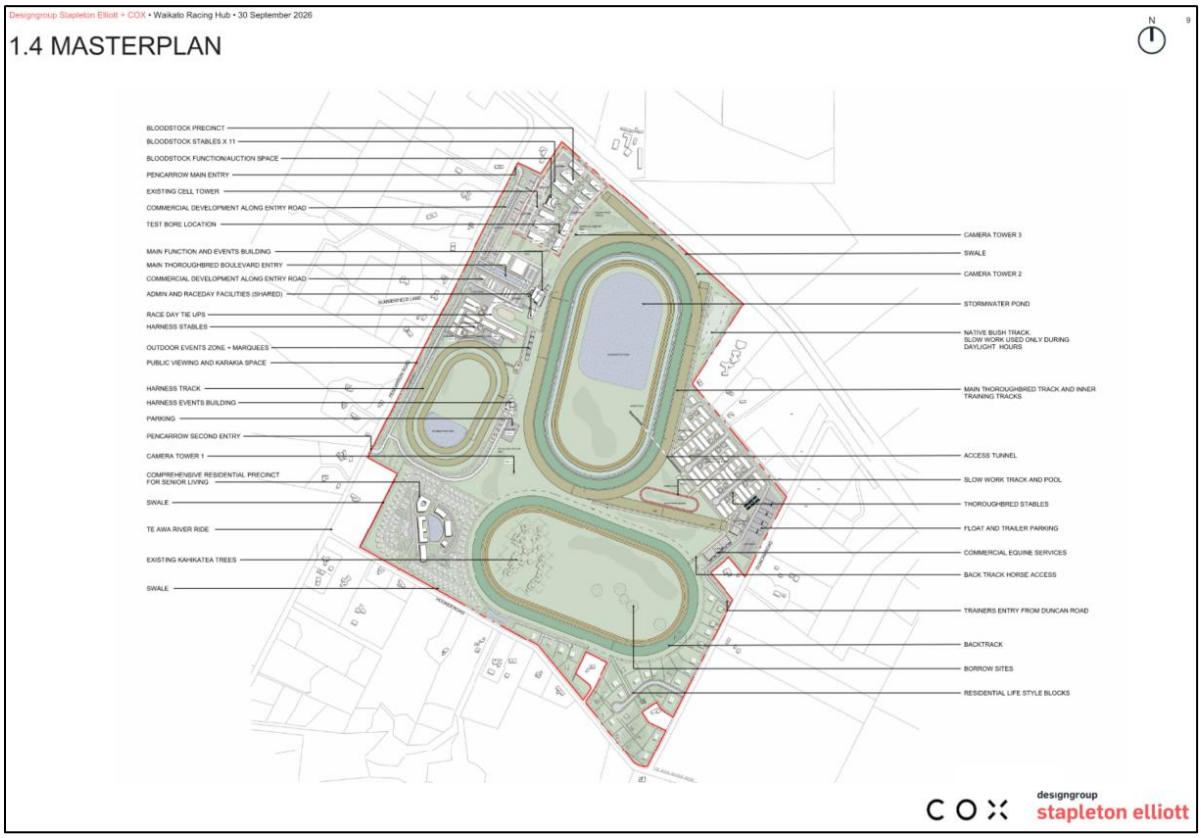


Figure 4: Proposed Masterplan

Overview

Over recent years, the use of racecourse land throughout New Zealand has undergone significant change, reflecting both evolving urban development pressures and structural changes within the racing industry. A growing number of racecourses have been redeveloped either in part, or in their entirety, to accommodate residential, commercial and mixed-use activities.

Examples of this trend can be observed at Ellerslie, Riccarton and Paeroa racecourses, where redevelopment initiatives have sought to optimise the use of substantial landholdings while maintaining an ongoing racing function where appropriate.

These redevelopment projects have been driven by a range of factors, including the declining frequency of race meetings at some venues, the need to rationalise racing infrastructure and avoid unnecessary duplication of facilities, and the opportunity to unlock the economic value of strategically located land assets.

Collectively, these initiatives are intended to provide a more efficient and financially sustainable platform for the long-term future of the racing industry. At the same time, racecourse operators are increasingly diversifying their offerings through the introduction of interactive, technology-enabled and experiential race-day attractions aimed at broadening patronage and attracting younger demographics.

The examples outlined above summarise recent and ongoing racecourse redevelopment projects across New Zealand.

Together, they provide useful context for understanding the scale, scope and range of activities that are driven by the recent trends for the redevelopment of racecourse land.

The range of the precincts as outlined below is designed to broaden the Hub's income base and increase usage and appeal of the facility.

The co-location of racing, training, industry services, and small-scale commercial uses alongside complementary residential uses creates operational efficiencies, reduces transport demand, and supports clustering benefits that would not be achievable through dispersed rural zoning.

This section of the application is a summary of the key elements of the proposal provided in accordance with clause 5(1)(a) of Schedule 5, clause 2 of Schedule 7 and clause 2 of Schedule 8 of the FTAA.

The extent of the Project is shown on the drawings attached as **Appendix N**. The following sections provide an overall summary of the proposal and are intended to be read alongside the visual material and technical reports accompanying this application for a full understanding of the proposal.

For completeness, the following approvals are sought under section 42(4):

- Resource consents as an approval under section 42(4)(a)) that would otherwise be applied for under the RMA;
- An archaeological authority as an approval under section 42(4)(i)) that would otherwise be applied for under the HNZPTA.

5.1 Subdivision Strategy

This section of the application and the subdivision scheme plans prepared by BCD Group ('BCD') attached as **Appendix NA** address the requirements of clause 8(1) of Schedule 5 of the FTAA in respect of the proposed subdivision within the project area.

The subdivision proposed will occur in two parts, the first being a boundary relocation between the existing Records of Title that make up the site to create five super lots. This is described in the below sections.

The second part will result in Lot 5 being further subdivided into 34 lots for rural lifestyle purposes, as well as the creation cul-de-sac road which will be vested to Council. This further subdivision is described in below.

The position of all new boundaries, areas of all new allotments and areas of land to be set aside for new roads are all illustrated on the subdivision scheme plans in **Appendix NA.**

A single road within the rural residential precinct is proposed to be vested with Waikato District Council as shown on the scheme plans.

All other right of ways within the project area that will not be vested will be privately owned and maintained by the respective lot owners that have legal access to those on the respective Certificate of Titles.

Super lot subdivision

A boundary relocation is proposed to be undertaken between the five existing Records of Title that make up the site to create five 'super lots'.

While three additional 'allotments' are created, the boundary relocation will start with five Titles and end with five Titles.

These Lots are described below:

Lot 1
This Lot is proposed to be 5.75ha in size and will contain the bloodstock precinct. Vehicle access to this Lot will be provided from Pencarrow Road via a series of right of way easements as shown on the scheme plan.

Lot 2
This Lot is proposed to be 2.17ha in size and is proposed to contain the commercial precinct. Vehicle access to this Lot will be provided from Pencarrow Road via a series of right of way easements as shown on the scheme plan.

Lot 3

This Lot is proposed to be 5,552m^2 in size and is proposed to contain the commercial precinct. Vehicle access to this Lot will be provided from Pencarrow Road via a series of right of way easements as shown on the scheme plan.

Lots 2 and 3 will be amalgamated together to form one record of Title.

Lot 4
This Lot is proposed to be 132.18ha in size and will contain the three tracks, training facilities, stables, event facilities and car parking. Vehicle access to this Lot will be provided directly from Pencarrow Road and via a series of right of way easements as shown on the scheme plan

Lot 5
This Lot is proposed to be 11.5ha in size and will contain the senior living development. Vehicle access to this Lot will be provided from Hooker Road as shown on the scheme plan.

Lot 6
This Lot is proposed to be 1.7ha in size and will contain residential lifestyle lots. No formed access is proposed for the creation of Lot 6 as the physical vehicle crossings and accessways are proposed to be constructed under the subsequent subdivision this is detailed in section 3.4.2 below.

Lot 7
As part of the 'super Lot subdivision' an amalgamation is proposed to occur with the neighbouring property at 101 Hooker Road (Lot 2 DP 404891)

Lot 7 will be created from RT 1027516 and is approximately 2,983m^2 in size. This Lot will then be amalgamated with the property at 101 Hooker Road.

While the property at 101 Hooker Road is not within the boundaries of the 'site' the land within Lot 7 is. There will be no activities associated with the Hub that will occur within Lot 7.

Furthermore, the s28 decision regarding the referral application described the project as including all associated subdivision.

The boundary relocation to create the super lot is an activity that directly supports and is subsidiary to the wider Hub development, as it facilitates the layout and configuration of the site for the racing hub and associated land uses.

Lot 8
This Lot is proposed to be 9.38ha in size and will contain the proposed residential lifestyle lots. No formed access is proposed for the creation of Lot 8 as the physical vehicle crossings and accessways are proposed to be constructed under the subsequent subdivision this is detailed in the below sections.

Lots 6 and 8 will be amalgamated together to form one record of Title

The Lot layout is demonstrated in **Figure 5** below:



Figure 5: Proposed Super Lot Scheme Plan

Access and Transportation

Legal access to Lots 1, 2 and 3 will be provided for by way of right of way easements over Lot 4 as shown on the scheme plan.

Legal access to Lot 5 will be provided for with a vehicle crossing to Hooker Road.

No formed vehicle access is proposed for Lot 4 and 5 as the physical vehicle crossings are proposed to be constructed under the respective land use consents sought through for the racing precinct, senior living precinct and residential subdivision.

Infrastructure Servicing

No servicing is proposed for the proposed Lots 1-8 as infrastructure to these lots will be delivered as part of the subsequent land use and subdivision activities.

These lots are all of a sufficient size to accommodate on-site infrastructure servicing within the proposed new boundaries in accordance with the proposed land uses.

Land Covenants

Land covenants for landscaping around the external Hub boundaries are proposed to be registered as illustrated on the provided scheme plans.

Residential Lifestyle Subdivision

After the boundary relocation takes place to create the five super lots, Lot 5 will be further subdivided for the purpose of creating 34 vacant residential lifestyle lots.

These Lots are proposed to have a minimum Lot size of 2,500m^2.

The layout is demonstrated below in **Figure 6** and **7** and in the Scheme Plans attached as **Appendix NA.**

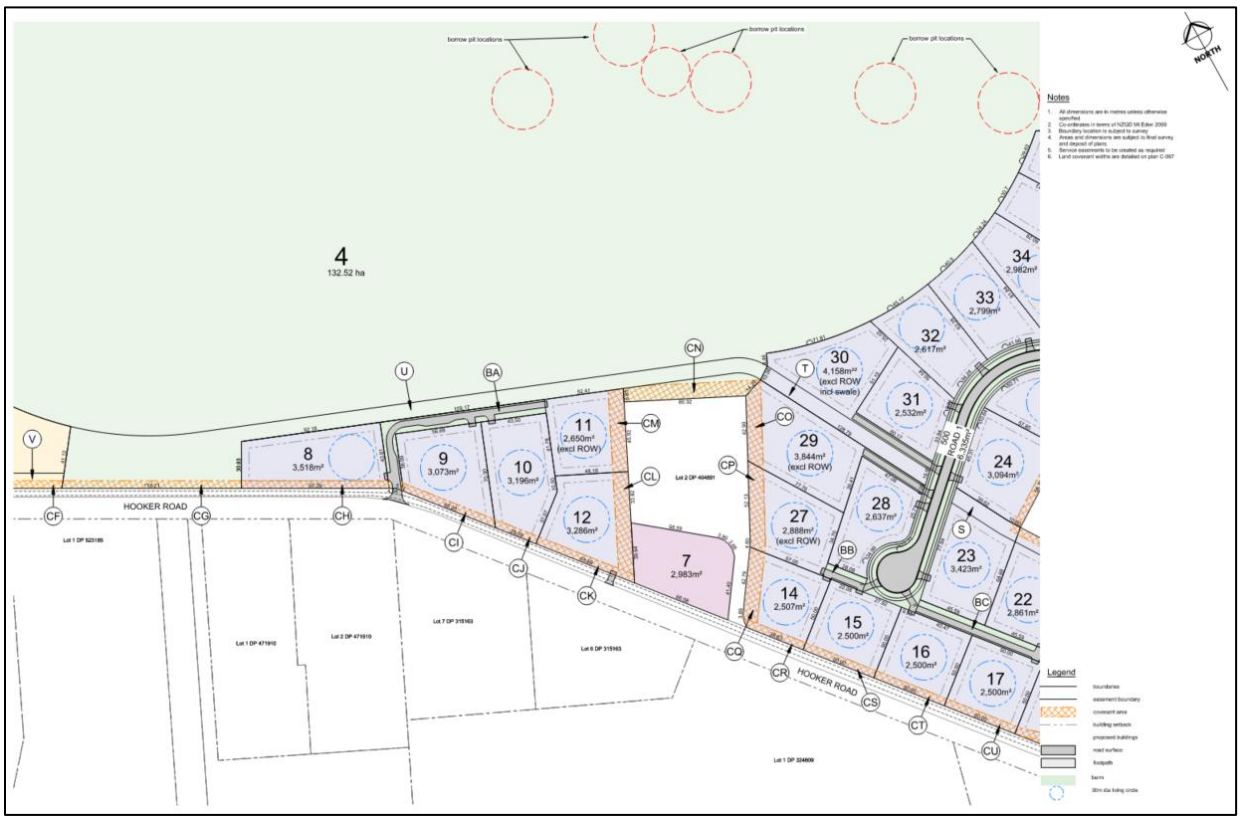


Figure 6: Subdivision of super Lot 6 and 8.

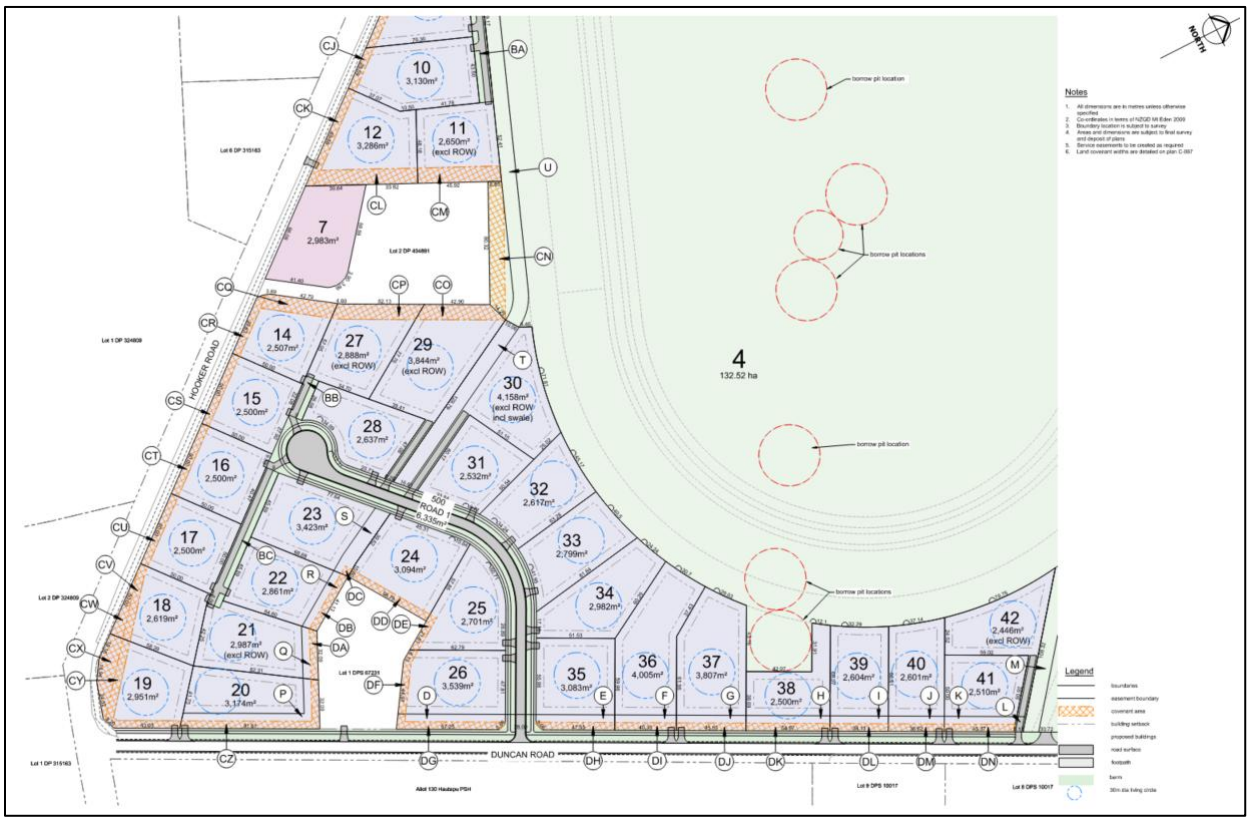


Figure 7: Proposed subdivision of super Lot 6 and 8.

Urban Design Overview

The overall design principles for the residential lifestyle development are to create a high amenity residential development that responds positively to the rural character of Waikato while providing legibility and connection to the wider area. The design is underpinned by principles of connectivity and movement, urban form and amenity.

The design vision and principles are discussed further in the Urban Design Assessment included as **Appendix O**.

Development Controls

The residential lifestyle subdivision will result in contains 34 vacant freehold Lots across the site. In order to provide certainty for the decision-making authority, and future owners/developers of the proposed Lots, a blanket resource consent is sought to have reduced setbacks within the development.

Under the WDP, setbacks of 7.5m to the road, 12m from a boundary when adjoining a lot of 1.6ha or less and 25m from a boundary when adjoining a lot of greater than 6ha are required.

It is proposed that all Lots within the rural lifestyle subdivision have a reduced setback of 5m from all boundaries.

All other General Rural Zone building rules will apply to these sites.

Building footprints have been shown on the provided scheme plans (**Appendix NA**), ensuring that all proposed Lots are capable of containing a dwelling with appropriate levels of on-site amenity.

The indicative site plans for residential lots are not a final representation of the built form, and land use consent is proposed only to enable construction of buildings that comply with the development controls set out above.

A residential design guide (RDG) will be required to be provided by the developer as a condition of consent and is referenced in condition 21 and 33 of the provided draft conditions. The RDG will outline the following:

(1) Site Layout

This section will establish mandatory development standards for freehold Lots that development must be in general accordance with. By setting clear standards, particularly for elements that impact streetscape and visual amenity, the standards ensure that Lots can accommodate dwellings at the anticipated density while maintaining a cohesive neighbourhood character.

(2) Architectural Design

This section is intended to inform a well-built urban environment rather than dictate the exact design, style and layout for each freehold Lot.

This section sets out the evaluative framework for future development to be assessed against. The intent of the matters set out in the Architectural Design section is to enable flexibility in design whilst encouraging diversity of design solutions that ensure a consistent quality of built form.

(3) Landscape Design

This section establishes internal landscaping standards for freehold Lots, with a combination of mandatory measures and suggested guidelines to ensure that the development is appropriately landscaped for on-site and streetscape amenity.

(4) Design Review Panel

Prior to the application for building consent, all designs on the freehold Lots must be reviewed and endorsed by a Design Review Panel established by the applicant, confirming that the design is in general accordance with the Design Guidelines. This will be done privately and is separate from Council process.

This is to ensure good urban design outcomes are reached as a result of the subdivision in accordance with the provided design guide.

5.2 Racing Precinct

Description and Proposed Activities

The precinct will contain the following activities, which are described in further detail in the below sections.

The 132.18ha site created via boundary relocation (referred to as Lot 4) is subject to this part of the application and is referred to as the racing precinct (the precinct).

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

Thoroughbred racing and training

- Thoroughbred racing facility including a main track with 2,000m starting chute
- Race day functions and events (up to 60 race and trial meetings per year)
- 1800m thoroughbred training track
- 500m warmup track
- Bush track
- Trainers' allotments – on-site stables and yards for up to 900 horses on-site.
- Events building with parade ring and tie ups
- Administration building
- Industry functions and events to be held within the events building.
- Vet and farrier building at 3,800m2 gross floor area each
- Provision to host certain temporary events not related to racing (conferences, awards events, industry training events etc)
- Parking areas for up to 2,310 vehicles (540 sealed, 1,770 overflow)
- Rehabilitation of the existing Kahikatea stand within the site
- All associated infrastructure and earthworks on and off site.

Harness racing and training

- 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).

The precinct will be serviced via on-site, self-managed infrastructure, including a wastewater treatment plant and disposal field, stormwater management via bio vegetated swales and detention ponds and an on-site groundwater-supplied water treatment and storage system for water supply for both potable and irrigation.

Thoroughbred Racing Facility

The components and operation of the thoroughbred racing facility are described in the below sections.

Main Track

The main track of the thoroughbred racing facility consists of the following tracks:

- The course proper – Covers a distance of 2,180m and has a reinforced sand surface.
- No1 grass track – Covers a distance of 1,970m and has a sandy loam base with grass surface.
- Synthetic track – covers a distance of 1,810m with a synthetic surface.
- No1 sand track – a distance of 1,750m with a sand surface
- No1 plough – a distance of 1,690m with a ploughed surface.
- A 500m warm up track and 800m bush track with sand surfaces.

Raceday Operations

Number of meetings (per year)
The precinct is proposed to accommodate 40 race meets per year, with these meets being classified as small, medium and large meetings.

29 meets are proposed to fall into the small category, 10 into the medium category and 1 into the large category.

The large-scale event is the upper limit in regard to the number of attendees and staff / contractors. The frequency of these meetings is a maximum of one per week.

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

	Large	Medium	Small	Total
Number of meetings	1	10	29	40
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).

The number of persons on site can be broken down into spectators and non-spectators. Non-spectators consist of facility staff, trainers, jockeys, stable hands and other racing staff.

Small scale meetings form the majority of thoroughbred events at 29 times per year. Small scale events attract approximately 750-1500 spectators and 250 non-spectators for an average total of 1,182 people on-site.

Medium scale meetings are proposed to occur 10 times per year and attract between 1,700 - 3,000 spectators, with approximately 290 non-spectators. This is an average of 2,415 people on site per medium scale event.

One large scale event is proposed per year. There are an expected 6,000 spectators at this event, with 330 non-spectators for a total 6,330 people on site on average for a large-scale event.

Race meet hours of operation

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 will leave the site around 10:30pm.

Trials

The precinct is proposed to host approximately 20 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:

	Trials
Number of trials	20
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 hours of operation

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

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

The last people will leave the site around 3:30pm post meeting.

Raceday Acoustics

An acoustic assessment has been prepared by BBA Acoustics (**Appendix P**) which discusses the operational noise emissions related to race days.

These emissions relate to the following:

Operational Noise:

- PA system and crowd noise for the Main Thoroughbred Racetrack covering the outdoor areas of the main events building and main outdoor events area (daytime periods only)
- PA system and crowd noise for the Harness Racetrack covering the Harness Events outdoor areas (daytime and evening periods)
- Low-level PA noise for the Tie Ups Bay (race information only, not typical PA levels)
- Car parking and vehicles noise
- Commercial Area Activity Noise

Acoustic Amenity

- Potential acoustic amenity effects from the residential activity in the Senior Living and Lifestyle Block to the WTR and State Highway

Construction Noise and Vibration

- Predominantly comprising earthworks for site levelling, roading and general construction activities related to buildings

The applicant has confirmed that all areas of the development will be closed and not operate after 9:30pm on any day. The site will not be used for additional festivals or functions that may involve external amplified music/speech, or noise-generating activities other than the racetrack activities previously described.

Effects relating to noise are discussed below.

Thoroughbred Race Day Events and Facilities

Main Events Building

The main events building is proposed to be a 1,203m^2 building that is predominantly single storey, with the exception of the judges box, which will form the second storey. This building will be approximately 9.3m in height

This building will also contain a lobby space, as well as a kitchen, bar areas and an open plan function space, along with a terrace area oriented towards the thoroughbred racing track.

The 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 not directly associated with horse racing.

These events will include, but are not limited to:

- Conferences
- Award ceremonies
- Banquets
- Cocktail functions
- Trade exhibitions
- Community events
- Private functions

A maximum of 500 patrons is proposed for any one event, with these events will be required to have patrons gone by 9:30pm, with all staff having left by 10pm on the day of any given event.

An event management plan (EMGP) will be required to be submitted to Council for certification as a condition of consent prior to any event occurring with all temporary events being required to comply with the requirements of the EMGP. This is referenced in condition 64-65 of the provided draft conditions.

This building is depicted in the masterplan documentation attached as **Appendix N** and shown in **Figure 8** below.



Figure 8: Events Building Render.

Administration Building

This single storey, 640m^2 building will contain the jockey lounge, weigh rooms and changing facilities for jockeys along with administrative offices, the winners lounge and stipes lounge. The building will be shared with the harness racing facility.

This building will have an approximate height of 5m.

This building is depicted in the masterplan documentation attached as **Appendix N** and shown in **Figure 9** below.

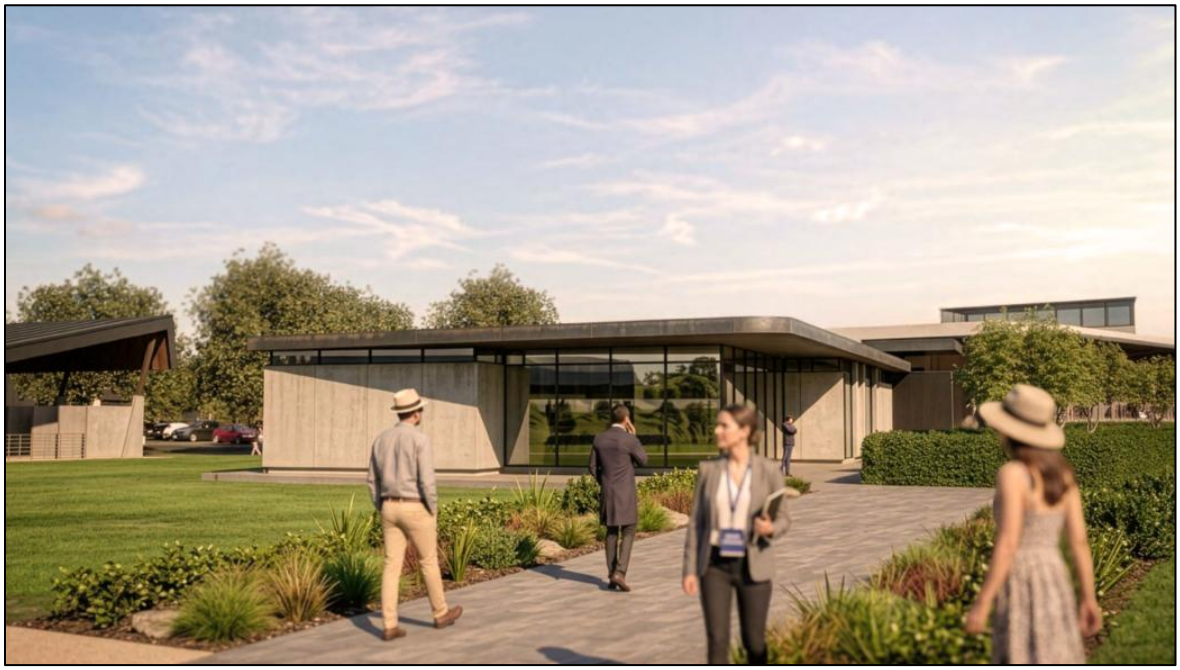


Figure 9: Administration Building Render.

Tie Ups and Parade Ring

The race day facilities also include a 150 bay tie up facility and parade ring located to the south of the main events building. This building has an approximate roof area of 4,000m^2 and has a maximum approximate height of 7m.

This facility will be used by both thoroughbred and harness racing and contains a vet office and box, along with swab facilities, along with a bathroom and washdown facilities.

This building is depicted in the masterplan documentation attached as **Appendix N** and shown in **Figure 10** below.



Figure 10: Tie-Ups Render

Race Spectators

A traditional grandstand is not proposed as part of the precinct. Thoroughbred races will be observed from the main events building and from the grassed area located to the west of the course proper.

No other permanent buildings are proposed, with temporary marquees providing shelter for spectators on raceday.

Camera Towers

Three camera towers are proposed around the thoroughbred racing track as illustrated on the masterplan.

These towers are proposed to be 12m high and are shown in **Figure 11** below:

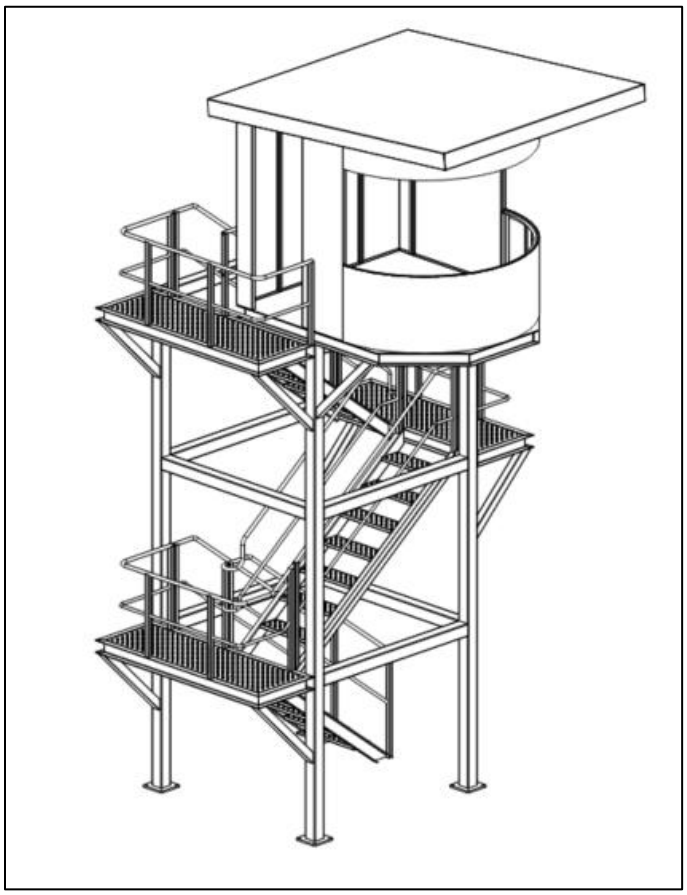


Figure 11: Proposed camera tower example

It is noted that construction of these towers would be a permitted activity if they are located over 50m from the site boundary.

Thoroughbred Training Facility

Thoroughbred training will represent the majority of the precinct operation calendar, operating approximately 365 days per year and will include both horses stabled in the on-site facilities and horses stabled outside of the site.

The context of this facility and operating assumptions are summarised below and discussed further in the Daily training and track maintenance operating plan, management plans are attached as **Appendix Q** with the applicable one to training and track maintenance attached as **Appendix QA.** Training occurs Monday to Sunday.

- Projected training population at maturity: 900 thoroughbred horses training per day on the training tracks (800 stabled on-site, 100 horses floated in).

- Training infrastructure: course proper (grass), synthetic all-weather track, sand track(s), back/trotting-up track, warm-up areas, horse walkers, swimming pool/water walker, and trainer stabling precincts.

- Training operates 7 days per week, 52 weeks per year. Sunday and public holiday activity is typically lighter (roughly 40–60% of weekday volume).

- The dominant activity window is early morning: approximately 04:30–10:30. Afternoon activity is limited to stable routines, light exercise (walkers, swimming), and track maintenance.

- Surface allocation is rotated daily by the Track Manager to manage wear, with the grass surfaces used selectively and the synthetic and sand surfaces carrying the bulk of daily work.

Buildings

The training complex is proposed to consist of 39 stable buildings across 24 and 12 horse typologies. These stables have an approximate maximum height of 6.3m.

Two smaller utility sheds are also proposed.

A render of the proposed stable buildings is shown in **Figure 12** below.

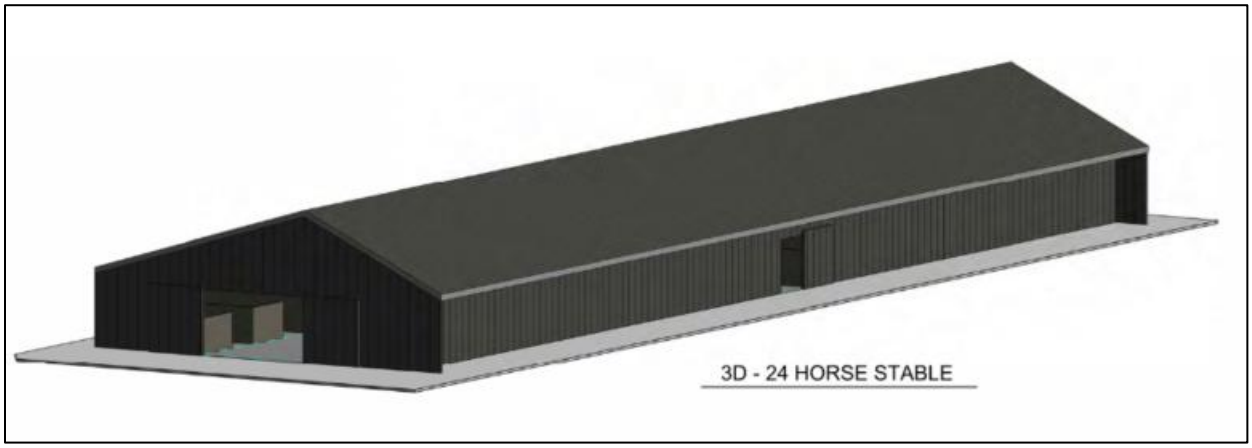


Figure 12: Proposed stable building render

Training Tracks

The training track consists of three individual tracks, which are described below:

- No 3 grass – A distance of 1,800m with a sandy loam base and grass surface.
- No 2 sand – A distance of 1,730m with a sand surface.
- No 2 plough – a distance of 1,660m with a ploughed surface.

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.
WTR TRACK STAFF	20	12	8
SERVICE PROVIDERS	15	5	-
BULK DELIVERIES	8	2	-
TRAINING - PEOPLE			
Trainers	50	40	20
Jockeys and Stable Hands	200	150	70
PEOPLE TOTAL	**293**	**209**	**98**
TRAINING - HORSES 2035			
Horses stabled on site initially	600	600	600
Horses floated in each day (40-50 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 293 people, Monday to Friday. The approximate number of people on-site during Saturday operations is approximately 209, with 98 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 hours of operation

The hours of operation for the training complex fall into four cycles as described below:

Early morning – track preparation and opening (4am – 5:30am)

- 4am – Track staff arrive, security disarmed, plant started. First staff vehicle movements (5-8 vehicles)
- 4:10am - Track inspection / checks)
- 4:30am - Tracks open for training stable lights and track lights on. First horses begin training.
- 4:30am – 5:30am - First wave of trackwork with on-site horses. Off-site trainers begin arriving via float.

Peak training window (5:30am – 10:30am)

- 5:30 – 8:30am – Peak trackwork period – highest horse numbers on all training surfaces. This is the peak time for on-site population and vehicle presence.
- 6am – Course proper / grass gallop session – allocated mornings only – typically 2-3 mornings per week.
- 6:30am – Uphill training rise sessions
- 7am – Vets, farriers and equine service providers on-site attending stables.

- 8:30am – 10:30am – Second Wave – slow work, education of younger horses, trot ups, walker and pool sessions.

Late Morning - Track closure and maintenance

- 10:30am – Tracks closed, final float departures from site.
- 11am – 1pm – Primary daily track maintenance tractor harrowing and rolling. Irrigation cycles as required.
- 12pm – manure and soiled stable bedding collection from stables to central composting facility.

Afternoon / Evening

- 1pm – 4pm - stable routines (feeding, grooming, walking work, paddock turnout.
- 2pm to 4pm – scheduled maintenance (mowing, rail moving, fencing / irrigation repairs)
- 4pm – 5pm – evening stable rounds, scheduled feed deliveries received.
- 5:30pm – Site secured – track staff depart. Security patrols overnight.

Hours of operation summary

Overall, training operations occur on the site from 4am to 5:30pm daily, with the peak activity concentrated from 5:30am to 10:30am.

Training Acoustics

BBA Acoustics attended early morning training activity at the current Cambridge thoroughbred training site. Noise measurements of typical early-morning training activities showed very quiet noise levels during the training activities themselves.

Only galloping horses and some conversation between trainers were expected, which is predicted to be mostly inaudible at all receiver notional boundaries and well below the nighttime noise limit.

Therefore, the main source of noise associated with training activities is due to vehicles entering and leaving the site. To mitigate potential noise effects from early morning vehicles of horse floats and light vehicles, a 1.8m high acoustic fence has been proposed on the boundary of the closest receivers.

With the proposed acoustic fence, noise from vehicle movements associated with early morning training will comply with the 40dB night-time limit.

Track Lighting

Two lighting systems are proposed for the thoroughbred training operations, which are outlined below and detailed in the lighting assessment attached to the application as **Appendix R.**

All obtrusive light spill from the track lighting is required to comply with the Australian / New Zealand standard (AS/NZS 4282:2023) which relates to controlling the obtrusive effects of outdoor lighting and identifies specific adverse effects relating to lighting.

These effects are identified below:

- Effect on residents

- Effect on transport system users
- Effects on transport signalling systems
- Effects on the night sky
- Effects on the natural environment

Lighting is measured in Lux, which is a measure of how bright light is on a specific surface. For reference, the operative in part Waikato District Plan has a permitted maximum light spill of 10lux measured horizontally and vertically at the notional boundary of **any other site** (not the subject site boundary) in the general rural zone.

Training lighting – Main Track

The lighting system for the training track within the main thoroughbred tracks is proposed to consist of 12 24.5m high steel masts (22m mast with 2.5m light array on top) with 4-5 1,500w floodlights per mast and are spaced approximately 140m apart. A lighting level of 20 lux on the training track itself is proposed.

These masts will be painted in recessive colours.

The lighting masts are located on the inside of the track and face outwards. An example of the lighting mast is shown in **Figure 13** below:

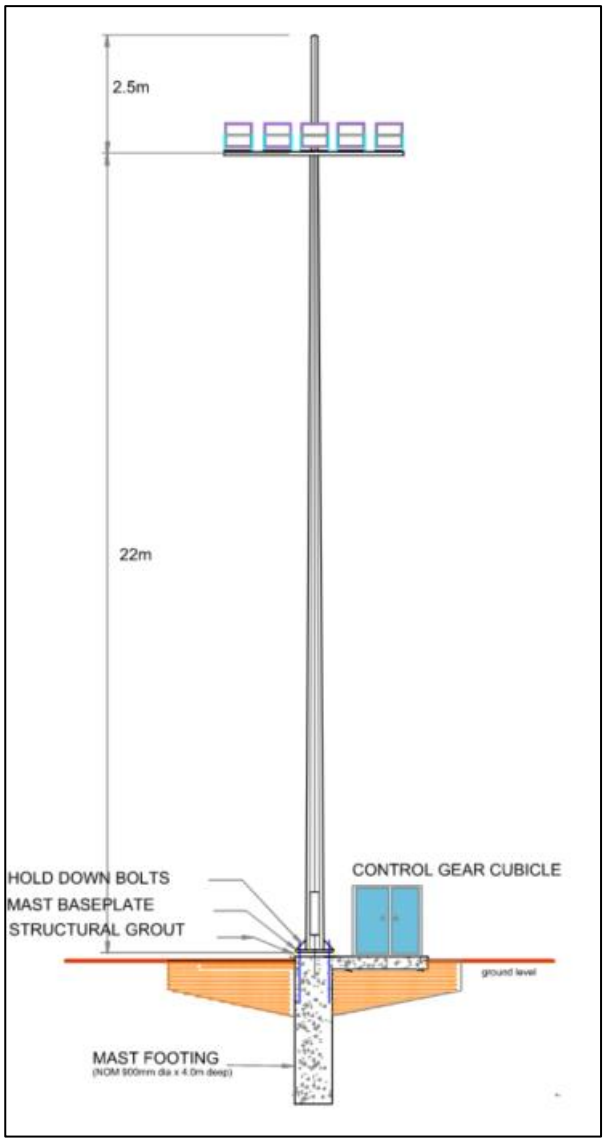


Figure 13: Indicative mast detail for main track lighting

Training Lighting – Training Track

For the training backtrack, this lighting system is proposed to consist of twelve 24.5m high masts located within the infield of the backtrack. These masts have three to four 1500w floodlights each and are proposed to be spaced approximately 140m apart. The proposed illuminance at track level is 20 lux.

The lighting systems for training on both the main track and training track will be turned on at 4:30am and turned off at sunrise.

The training lighting system will be designed to achieve a light spill level of 4 lux at the boundary of the kahikatea stand.

These lighting masts are the same as shown in **Figure 13** above and will be painted in recessive colours.

It is expected that all track lighting associated with thoroughbred training will comply with District Plan limits of 10 lux at the notional boundary of neighbouring sites.

Harness Racing Facility

A 1,000m harness raceway is proposed within the south-western corner of the site parallel with Pencarrow Road. 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 frequency of these meetings is one per week.

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 hours of operation
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. 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 on-site will be required to have left the site at 10:30pm year-round.

Harness Events Building

The harness events building is proposed to be a 288m^2 building that is predominantly single storey, with the exception of the judges box, which will form the second storey. This building will be approximately 9.3m in height

This building will contain a kitchen, bar area and an open plan function space, along with a terrace area oriented towards the thoroughbred racing track.

The building will also 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 as described below.

This building is depicted in the masterplan documentation attached as **Appendix N** and shown in **Figure 14** below.



Figure 14: Harness Events Building Render.

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 harness training, with approximately five horses being transported to the site each day for training.

Training hours of operation

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.

Buildings

Ten training stables are proposed to be constructed to the north of the harness track. These stables will be in the same style as the thoroughbred training stables and will be a mix of 24 and 12 horse stables.

Two accessory buildings for maintenance and utility storage are also proposed. These buildings are proposed to have a gross floor area of 500m^2 and 850m^2 respectively.

Track Lighting

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

Racing lighting

The lighting system proposed for racing consists of 17 24.5m high masts (type F) located within the track infield. These masts will have 10 1500w floodlights per mast. Seven 22.5m high masts (type H) along the front straight are proposed with six 1005w floodlights per mast.

Elevations of these lighting systems are shown in **Figures 15** and **16** below.

This lighting system has an illuminance level of 1,000 lux at track level and 1,200 lux towards the ctv camera. An illumination level of 2,000 lux is required at the finish line. This level of lighting is required for television broadcasts.

Track lighting will be required to be turned off at 10pm after the last race has been run. The lighting system associated with harness racing will not comply with District Plan permitted thresholds at the notional boundary of neighbouring sites.

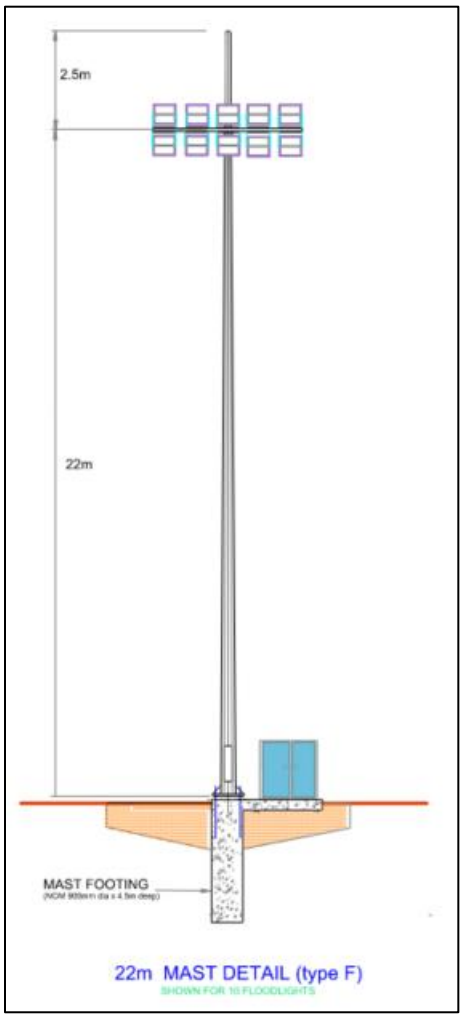


Figure 15: Indicative mast detail for harness track lighting

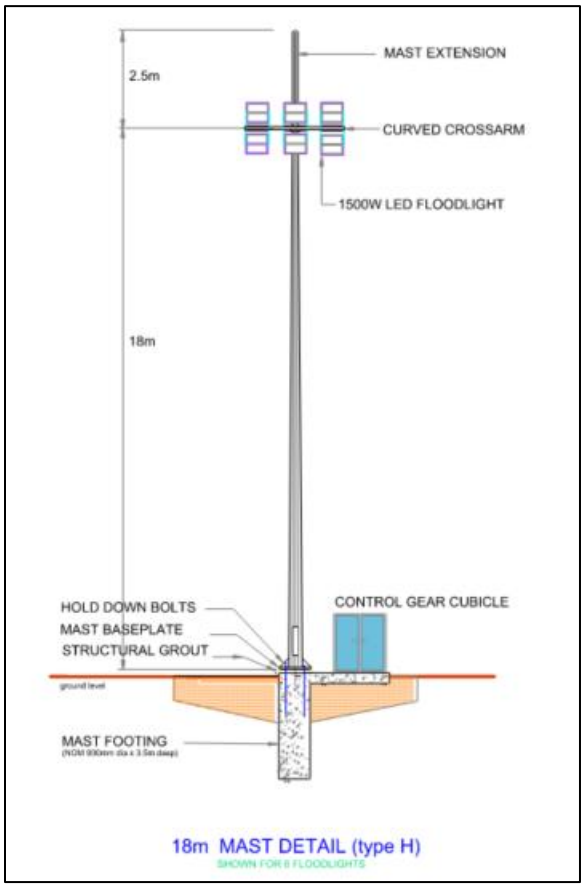


Figure 16: Indicative mast detail for harness track lighting

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 20 lux at track level.

The lighting for harness training will be turned on at 5am and turned off at sunrise. Lighting associated with harness training will comply with District Plan limits of 10 lux at the notional boundary of neighbouring sites.

Other Lighting

Public lighting at the site will be required for personal safety and safety of movement of people being at the site for the various training sessions and publicly accessible spaces during evening and nighttime events, in accordance with Crime Prevention Through Environmental Design (CPTED) principles.

Public lighting will be designed for the following areas:

- Internal roads and footpaths
- Public car parks
- Horse float car parks
- Access tunnel to main training tracks
- Horse stables
- Events / function centres

Lighting will be designed to comply with the Australian and New Zealand lighting codes AS/NZS 1158

5.3 Bloodstock Precinct

Bloodstock Auctions and Attendances

The 5.75ha site created via boundary relocation (referred to as Lot 1) is subject to this part of the application and is referred to as the bloodstock precinct (the precinct).

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 that includes a bloodstock operation 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 precinct will hold up to ten live physical sales each year, with four main events held over multiple days. Most of the events are held over a single day, with the maximum sale length being over a four-day period. These sales are held during regular working hours

Attendees for the major sales events would be approximately 1,000 attendees, broken down into the following categories:

- Purchasers and industry people – 600
- Horse Vendors and staff (grooms etc) – 300
- Bloodstock staff – 100

Bloodstock Sales Pavilion and Administration Building

This is proposed to be a two-storey building with a footprint of approximately 1,500m^2. A maximum building height of 10m is proposed.

The ground floor consists of a lobby and breakout area, along with a kitchen, bar, vet hub and administration areas.

The ground floor also contains the parade ring and the auction hall.

The first floor contains the auction hub and buyer area, VIP areas, a breakout space and bar.

An indicative render of the building is shown in **Figure 17** below:



Figure 17: Render of the Sales Pavilion and Administration Building

Stable Buildings

The stable complex is proposed to consist of 11 stable buildings across two typologies that hold either 12 or 24 horses. These stables have an approximate maximum height of 6.3m.

A render of the proposed stable buildings is shown in **Figure 18** below.

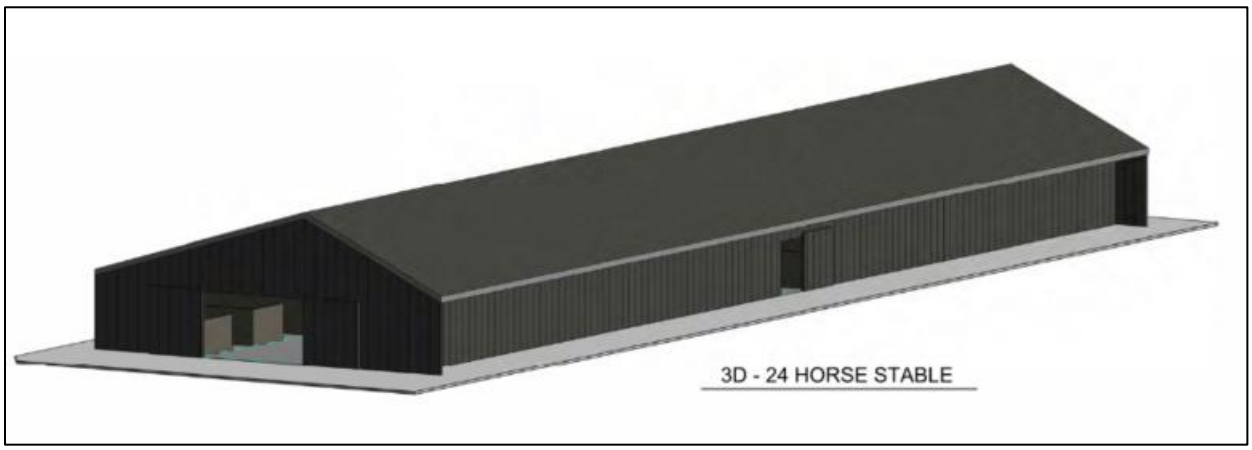


Figure 18: Proposed Stable Building Render

5.4 Senior Living Precinct

The 111.47ha site created via boundary relocation (referred to as Lot 5) is subject to this part of the application and is referred to as the senior living precinct (the precinct).

Specific to the senior living precinct, the proposed site layout and applicable areas are demonstrated in the development masterplan prepared by Design Group Stapleton Elliot (DGSE) and Cox, which are attached to the application as **Appendix N** and are shown in **Figure 1** below:

The senior living precinct is proposed to contain the following:

- 90 single storey villas in both detached and duplex format.
- 40 apartments in three, two-storey buildings
- 160 bed care facility within two, two-storey building along with a two-storey community centre
- Private internal roads and landscaping.
- Leisure and entertainment facilities for residents of the precinct, including café, lounge, library, gym, and bowling green;

Buildings

A total of 90 single storey detached and duplex villas are proposed, as shown in the masterplan documents (**Appendix N**), with all villas being single storey. The majority of these are intended to be stand alone, however a smaller number are also demonstrated in the architectural plans as being of a duplex construction.

The precinct will include four different villa typologies, with the villas being oriented to respond to their location within the site and maximise orientation to sunlight. These typologies are shown in **Figure 19** below:

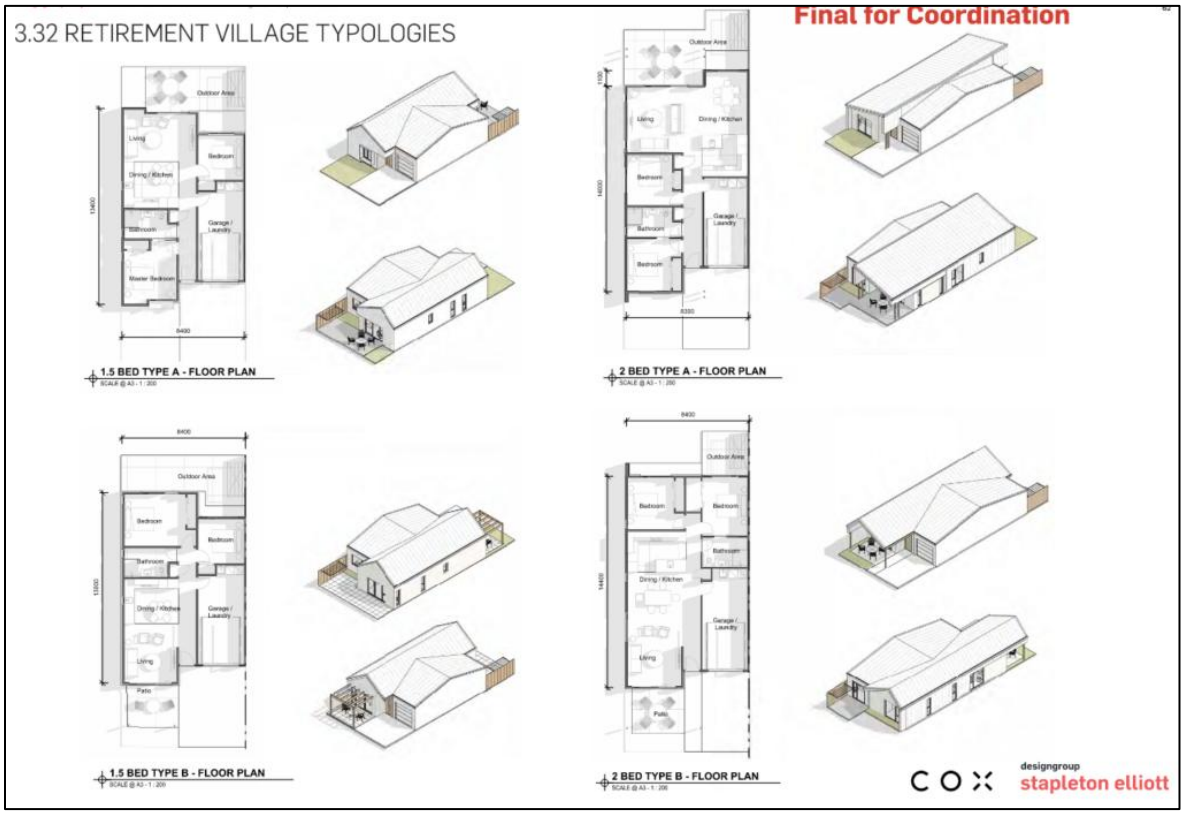


Figure 19: Proposed Villa Typologies

In addition to the retirement villas, a 160-bed aged-care hospital is proposed centrally within the precinct across two, two storey buildings. This building is proposed to be approximately 10.2m in height. An indicative render is shown in **Figure 20** below.



Figure 20: Indicative Care Facility Render

The facilities building is intended to act as a community hub, with precinct leisure facilities along with a bowls green and other park spaces.

5.5 Commercial Precinct

The 2.34ha site created via boundary relocation (referred to as Lot 2) is subject to this part of the application and is referred to as the commercial precinct (the precinct).

The precinct is proposed as a commercial Hub which is intended to complement the other activities proposed within the wider Hub.

Commercial Activity is defined in the Waikato District Plan as: *any activity trading in goods, equipment or services. It includes any ancillary activity to the commercial activity (for example administrative or head offices).*

To narrow this definition, it is proposed to allow for the following activities within the precinct:

- Bars / Cafés / Restaurants
- Food Outlets
- Retail Activities (with the exceptions identified below)
- Medical Facilities

In response to community feedback, the precinct is proposed to not include the following activities:

- Off-license or liquor stores.
- Gaming venues

The precinct is described in further detail in the below sections.

Approximately 130 sealed carparks are provided to service the commercial precinct.

The proposed site layout and applicable areas are demonstrated in the development masterplan prepared by Design Group Stapleton Elliot (DGSE) and Cox, which are attached to the application as **Appendix N**.

Buildings

The precinct is proposed to consist of eight buildings with a maximum height of 9m. These buildings are described below:

Buildings A - D

These buildings have approximate gross floor areas of 940m^2 each, with each building proposed to be split into four individual tenancies of 200m^2, with a central shared amenity space of approximately 78m^2 for each building. These buildings will have a maximum height of 9m.

Building E1

This building is proposed to have a floor area of 600m^2 and is a single tenancy. This building will have a maximum height of 9m.

Building E2 - E8

This building has a floor area of 2,500m^2 split into seven 300m^2 tenancies, with two shared amenity areas. This building will have a maximum height of 9m.

Other Buildings

A 1,300m^2 and 2,000m^2 building are also proposed to be included. These buildings will have a maximum height of 9m.

See **Figure 21** below for the indicative elevations proposed for the commercial precinct.

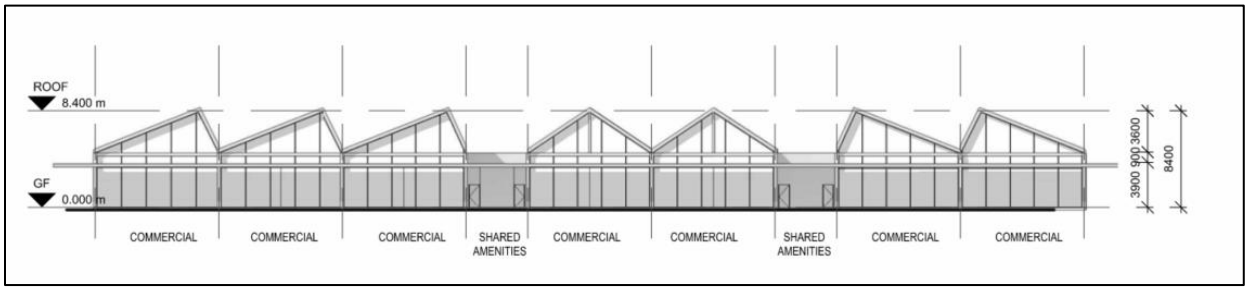


Figure 21: Proposed Elevations – Commercial Precinct

Hours of Operation

The commercial activities within the precinct are proposed to have operating hours within the following times:

- Monday to Friday – 7am – 9:30pm.
- Saturday – 7am – 9:30pm
- Sunday – 7am – 9:30pm

All deliveries will be required to be delivered within these hours via a condition of consent. This is referenced in condition 3 of the commercial precinct draft conditions.

Subdivision

It is proposed to subdivide the precinct into eight freehold Lots created around the proposed buildings. A further Lot is proposed to contain the carparking footpaths and other public areas which will be held in joint

ownership between the eight freehold Lots created.

These Lots are described below and are demonstrated on the scheme plan attached as **Appendix NA**

Lot 201 – 1,002m^2

Lot 202 – 1,004m^2

Lot 203 – 1,005m^2

Lot 204 – 1,003m^2

Lot 205 – 1,372m^2

Lot 206 – 2,055m^2

Lot 301 – 632m^2

Lot 302 – 2,666m^2

Lot 210 – This Lot will be 1.59ha in size and will contain the common areas within the precinct such as carparking, public spaces and pedestrian accesses. This Lot is proposed to be held in six shares between Lots 201-206 above.

Lot 310 - This Lot will be 3,324m^2 in size and will contain the common areas within the precinct such as carparking, public spaces and pedestrian accesses. This Lot is proposed to be held in half shares between Lots 301 and 302 above.

5.6 Earthworks

Earthworks associated with the subdivision will be limited to the creating of the vehicle crossings and the proposed cul-de-sac.

In regard to the other precincts, indicative earthworks volumes across each precinct site are identified below:

Racing precinct (132.18ha)

- Topsoil scrape (350mm depth) – 414,625m3
- Total cut – 397,798m3
- Total fill – 475,845m3

Earthworks will be broken down into the construction phases discussed in section 8 below to avoid large areas of earthworks being undertaken across the racing precinct.

Bloodstock precinct (6ha)

- Topsoil scrape (350mm depth) – 25,614m3
- Total cut – 13,788m3
- Total fill – 23,885m3

Senior living precinct (11.47ha)

- Topsoil scrape (350mm depth) – 36,310m3
- Total cut – 8,902m3
- Total fill – 13,103m3

Commercial precinct (2.34ha)

- Topsoil scrape (350mm depth) – 10,255m3
- Total cut – 5,901m3
- Total fill – 23,002m3

The below measures will be incorporated in regard to undertaking earthworks on the site.

Erosion and Sediment Controls

Erosion and sediment control measures will be installed prior to any earthworks occurring on the site to minimise adverse effects associated with the discharge of sediment into the receiving environment.

A draft ESCP for the precinct has been included with this application as **Appendix QB**. The key potential measures include decanting earth bunds, sediment retention ponds, diversion channels, silt fences and stabilised construction vehicle entrances.

This ESCP will require certification by Council as a condition of consent. This is referenced in the following draft conditions provided within **Appendix T**;

- Condition 39-41 of **Appendix TB;**
- Conditions 40-43 of **Appendix TC;**
- Condition 32-34 of **Appendix TD;**
- Conditions 32-34 of **Appendix TE;**
- Condition 11 of **Appendix TF.**

Contamination and Acid Sulfate Soils

A PSI has been prepared by BCD Group and is attached as **Appendix J**. The site is classified as a 'piece of land' under Regulation 5(7) of the NESCS.

Works on site are proposed to be carried out in accordance with the Contaminated Site Management Plan (CSMP) included as **Appendix JA** and Acid Sulphate Soil Management Plan (ASSMP), provided as **Appendix JB.**

5.7 Cultural Monitoring

To address the recommendations received in the CVAs (**Appendix K**), the opportunity for cultural monitoring by representatives of relevant mana whenua will be available.

This will include site monitoring inspections at the commencement of works, during works, and at the conclusion of work. This is provided for as a condition of consent. This is referenced in the following draft conditions provided within **Appendix T;**

- Condition 29 of **Appendix TB;**
- Condition 28 of **Appendix TC;**
- Condition 22 of **Appendix TD;**
- Condition 22 of **Appendix TE.**

5.8 Transport

Access to the Hub is proposed from Pencarrow, Hooker and Duncan Roads. Two vehicle entrances are proposed from Pencarrow Road that are located at the northern and southern ends of the site.

These two entrances will provide vehicle access to the thoroughbred and harness racing infrastructure, along with the bloodstock and commercial precincts.

A single entrance is proposed from Duncan Road, which provides truck and light vehicle access to the thoroughbred training complex.

Access to the senior living precinct is proposed from Hooker Road.

These entrances will be constructed to Waikato Regional Infrastructure Technical Specification (RITS) standards.

Entrance details are discussed in further detail in the below sections.

Hughes Traffic & Transportation have been engaged to produce an integrated transport assessment (**Appendix F**) of the proposed development and conclude that overall, the Hub is expected to be capable of being established with transport effects that are appropriately managed through access design, on-site parking, event management, and construction management.

They note that with the additional event traffic management in place during the large race day events any conflicts can be adequately managed.

Internal Transport Network

A design memorandum for the internal transport network has been prepared by BCD Group which is attached as **Appendix FA.** The memorandum outlines the proposed road and transport design philosophy for the development and assesses both the current road network standards and the proposed designs against the relevant requirements of the Waikato District Plan, RITS, and other applicable standards and guidelines.

The assessment considers the design and operation of the internal road network. Where departures from standard requirements are proposed, the memorandum provides the design rationale and demonstrates how the intent of the relevant provisions is achieved.

External Transport Connections

The proposal includes three major vehicle access points onto the public road network consisting of two onto Pencarrow Road, two onto Hooker Road and a number of entrances onto Duncan Road (eastern boundary)

Pencarrow Road

The northern vehicle crossing onto Pencarrow Road primarily serves the bloodstock precinct/stables, the large function spaces and associated carparks, horse racing track, and the commercial buildings facing Pencarrow Road.

This access is proposed to provide a right-turn bay to allow vehicles to safely refuge in the flush median as they wait to turn right into the site.

This layout minimises disruption for through vehicles travelling northbound along Pencarrow Road. The vehicle crossing has also been designed with two exit lanes (one each for the LT and RT movements). As shown, these two separate lanes are not required for 'normal' operation, but they have been retained to ease congestion and allow for easier exiting movements on the major event days, which will only occur a few times each year.

A cycle crossing facility is also setback into the site to assist users of the Te Awa Cycleway by moving the crossing point away from the give-way line of the proposed vehicle access. A diagram of the proposed entrance is shown in **Figure 22** below:

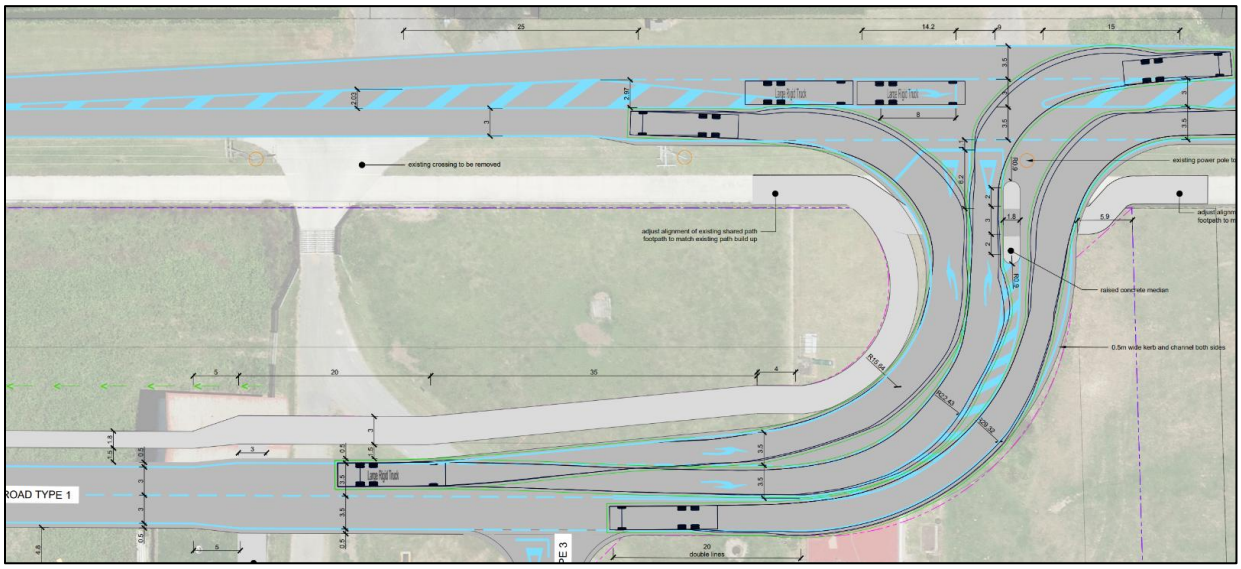


Figure 22: Proposed Northern Pencarrow Road Entrance

The southern vehicle crossing onto Pencarrow Road serves the harness track, events building, harness trainers' area and the associated carparks.

The design of this vehicle crossing is very similar to that of the northern vehicle crossing onto Pencarrow Road including a right-turn bay for motorists travelling north along Pencarrow Road, two exit lanes, and an offset cycle crossing facility. A diagram of the proposed entrance is shown in **Figure 23** below:

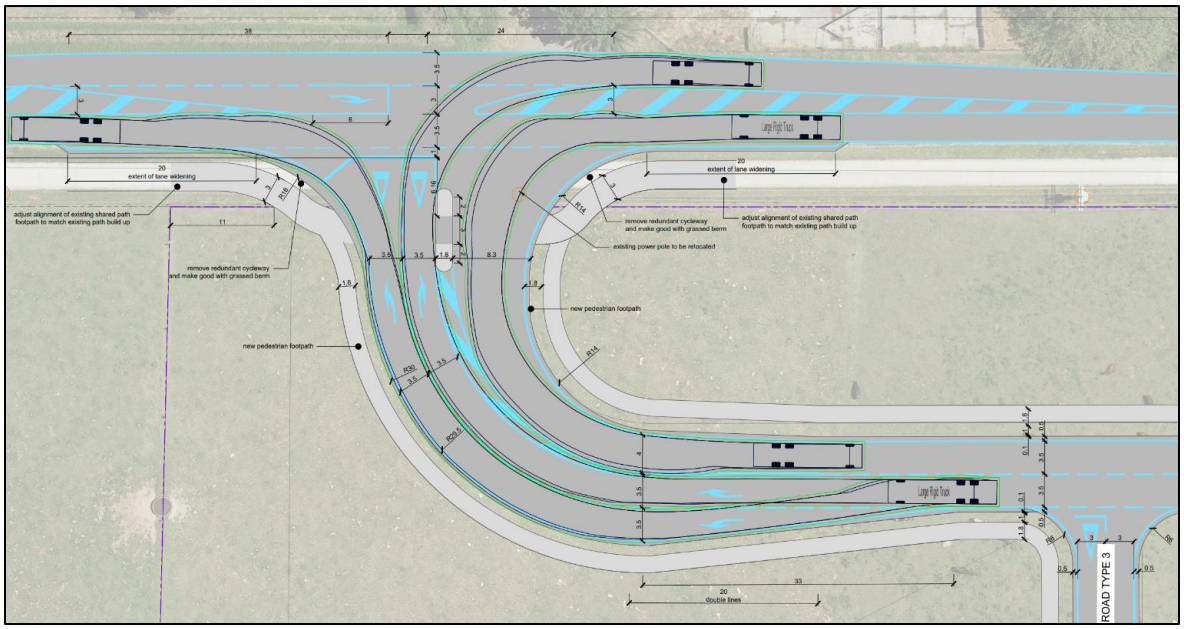


Figure 23: Proposed Southern Pencarrow Road Entrance

Hooker Road

A single vehicle access point is proposed to the precinct from Hooker Road. It is also proposed to provide a right-turn bay in Hooker Road to allow vehicles to safely refuge in the flush median as they wait to turn right into the site.

This layout minimises disruption for through vehicles travelling along Hooker Road.

A cycle crossing facility is also setback into the site to assist users of the Te Awa Cycleway by moving the crossing point away from the give-way line of the proposed vehicle access. The layout of this access is shown in **Figure 24** below:

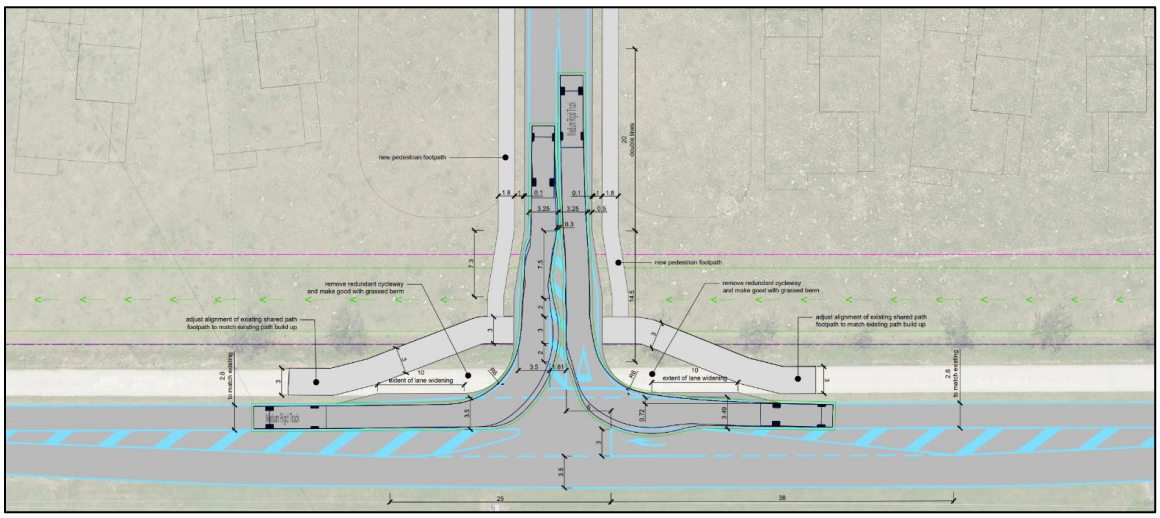


Figure 24: Proposed Hooker Road entrance

Lots 8 to 11 are proposed to be accessed from Hooker Road via a shared right of way (row) that will be constructed to District Plan and RITS standards. The use of the shared row reduces the number of new vehicle crossings onto Hooker Road.

Lot 12 will require the construction of a new vehicle entrance from Hooker Road.

<u>Duncan Road</u>

The thoroughbred training complex will be accessed via a new entrance from Duncan Road. This vehicle crossing has been designed to accommodate simultaneous inbound/outbound movement of a large rigid truck which is the largest design vehicle expected to use this vehicle crossing.

A diagram of the proposed entrance is shown in **Figure 25** below:

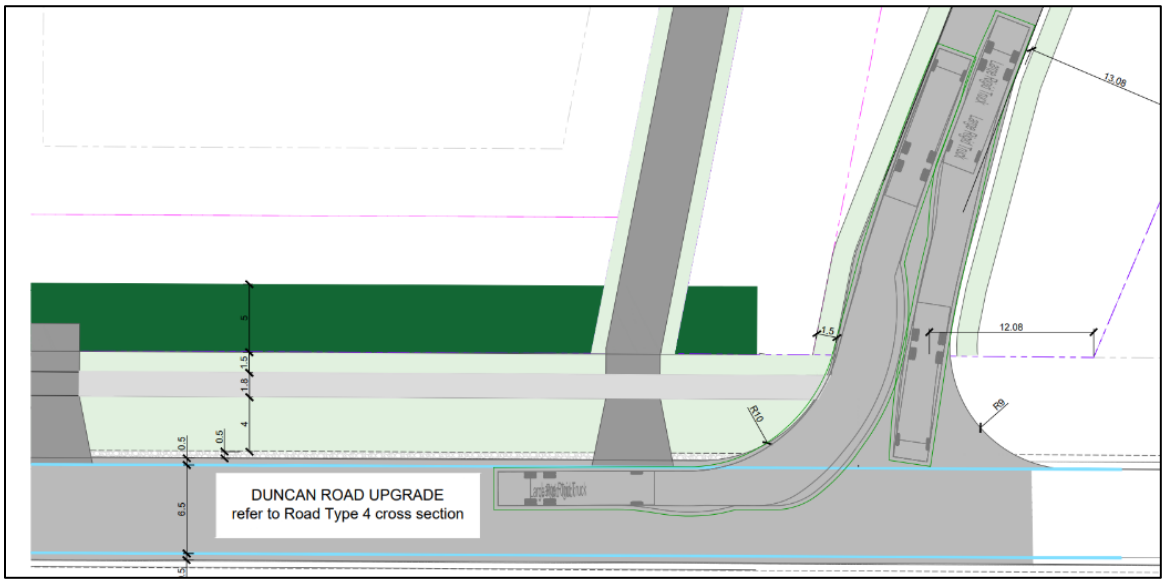


Figure 25: Proposed Southern Pencarrow Road Trainers Entrance

The Lots created as part of the residential lifestyle subdivision are proposed to be accessed either from Hooker or Duncan Roads.

Lots 14-18 and Lots 21 – 35 will all be accessed via the proposed road 1. This cul-de-sac is intended to operate as a low-speed environment, reinforced by the proposed road design.

It is proposed that the roading infrastructure of the cul-de-sac with access to Duncan Road will be vested to Council and therefore the design of this road has been aligned to the Regional Infrastructure Technical Specifications (RITS) V2 2025.

Lots 19 - 20, 36 - 37, 38 - 39 and 40 - 41 will utilised shared dual entrances from Duncan Road.

Lot 42 will have its own individual vehicle entrance from Duncan Road.

Local Roading Upgrades

Pencarrow Road

Outside of the proposed right hand turn bays discussed above and associated widening of Pencarrow Road in the proposed entrance locations, no other upgrades are proposed to the formation of Pencarrow Road.

Duncan Road
It is proposed to upgrade Duncan Road to provide a 6.5m wide trafficable carriageway consisting of 3.25m wide lanes in both directions and an additional 0.5m sealed shoulder and 0.5m unsealed shoulder on both sides of the carriageway.

A 1.8m wide footpath will also be provided on the western side of the corridor to facilitate pedestrian movements along the road frontage of the subject site.

The proposed upgrade exceeds the requirements outlined in the District Plan and additionally also provides a footpath on the western side of the corridor.

Only one change is proposed to the existing intersections in vicinity of the subject site. It is proposed to install a right-turn bay at the Duncan Road / Hooker Road intersection to facilitate the increased demand for right-turn movements from trainers travelling to the site daily. A large majority of these trainers are expected to travel from Cambridge, hence will turn right via the Hooker Road/Duncan Road intersection.

Pedestrian and Cycle Access

As the site is bound by the Te Awa Cycleway along the south and western boundaries of the site, consideration has been taken to ensure that vehicle crossings over this path is kept to a minimum to reduce conflicts between pedestrian/cyclists and vehicles. The design for these accesses preserves route continuity and provides clear intervisibility and a legible priority arrangement.

As part of the community consultation that has been undertaken to date as part of this development, a key takeaway for the surrounding community was ensuring that access to the proposed commercial/hospitality buildings be made from the Te Awa cycleway.

As such, the proposed development has provided for extending the 3m wide shared path into the site to the commercial/hospitality buildings.

Pedestrian access throughout the site will be provided by a mixture of 1.8m wide concrete footpaths adjacent to the roads, or via limestone paths as outlined in the landscape plans. These footpaths will ensure that pedestrian access to the various precincts will be readily accessible.

Public Transport

Public transport accessibility to the site in terms of a regular service is currently limited.

During large raceday events it is expected that public transport will be made available to the public and that specific site traffic management will be implemented.

A dedicated bus parking area will be made available to enable the efficient pickup and drop off of people to the race day facilities.

Traffic Management Plans

The following management plans have been prepared in relation to traffic management:

Event Traffic Management Plan

An event traffic management plan (ETMP) has been prepared by SELA civil advisory ltd attached as **Appendix QC**.

The ETMP establishes a scalable, risk-based operational framework for managing event-day traffic across a diverse programme of racing and bloodstock activities, ensuring safe and efficient operation of the surrounding transport network.

The ETMP places racing event traffic management measures into 4 categories, which are summarised below:

- Level 0 — No TMP Required - Mid-week races with fewer than 1,000 attendees - Harness races with fewer than 1,000 attendees.
- Level 1 — Light TMP - Weekend races with 1,000–2,000 attendees and Bloodstock events (~1,000 attendees).

  Measures: parking marshals; minor signage; pedestrian control near the Te Awa River Ride, overflow parking to be activated.
- Level 2 — Moderate TMP - Feature days with 2,000–5,000 attendees.

  Measures: temporary speed reductions via the queue-responsive electronic speed management system, traffic controllers at Pencarrow Road; dedicated pedestrian corridors; overflow parking activation; pedestrian and cyclist control near the Te Awa River Ride.
- Level 3 — Full TMP - Events with more than 5,000 attendees.

  Measures: full intersection control at the two entry exit points on Pencarrow Road for peak flows; shuttle services; roadside VMS to advise local traffic of expected delays; Police coordination; cyclist control near the Te Awa River Ride crossing point.

The ETMP also discusses any overlap with the regional field days event held at Mystery Creek events centre, approximately 2km from the site.

It is proposed that no racing events will overlap with the dates for the field days event, given this occurs during the racing off-season. To avoid cumulative congestion impacts with the field days, a blackout window of no events for two days before field days, no events during field days and no events for three days after the event is proposed.

It is considered that compliance with the requirements of the ETMP will mitigate any adverse traffic effects in relation to events held within the precinct.

Construction Traffic Management Plan

A draft construction traffic management plan (CTMP) has been prepared by BCD Group and is attached as **Appendix QD**.

The draft CTMP highlights the general objectives and principles to be followed during the construction phase of each precinct. It has been prepared to provide confidence that any transport effects anticipated to arise during construction can be avoided, remedied or mitigated.

The key principles set out in this draft CTMP will form the basis of the final CTMP required by conditions of consent that will be prepared by the successful Contractor prior to the commencement of physical works.

5.9 Infrastructure

The precinct is proposed to be serviced by on-site, self-contained systems as there is no Council reticulation available to the site.

Further information is provided within the civil design report included as **Appendix I** and hydrogeology assessment (**Appendix GA)** and summarised in the sections below.

In relation to the super Lot subdivision, no servicing is proposed for the proposed Lots 1-8 as infrastructure to these lots will be delivered as part of the subsequent land use and subdivision activities.

These lots are all of a sufficient size to accommodate on-site infrastructure servicing within the proposed new boundaries in accordance with the proposed land uses.

Wastewater

The RITS wastewater design standards sets out design and construction standards for wastewater and requires all land development projects to be provided with a suitable means of wastewater disposal.

As connection to council infrastructure is not an option for this site, it is proposed that the development will have its own wastewater treatment plant to manage and treat wastewater on site.

The large variation in expected flows requires careful consideration for the most appropriate wastewater treatment and disposal systems. As such InnoFlow have been engaged to provide the applicant with a site-specific system designed to accommodate the large fluctuations in the expected flows.

The race day facilities will be expected to manage the greatest wastewater flows and also the largest variation between peak and typical flows. InnoFlow have proposed the use of a moving bed bio reactor (MBBR) which is a form of aerated fixed film media process.

Due to the more consistent flows expected from the thoroughbred trainers' facilities and equine support services, along with the large distance between this area of the site and the race day facilities a typical OSET wastewater system is proposed.

The current design also accounts for all wastewater flows from the peak race days to enter the proposed system and does not account for the use of portable toilets which could greatly reduce the size of the required system.

Further refinement of the proposed wastewater design and how wastewater flows will be managed during race day events will be completed as part of the detailed design process.

In regard to the senior living precinct, as design of the precinct is progressed it is likely that this area will dispose of its wastewater flows via its own separate wastewater treatment plant and disposal system.

The design of the senior living precinct is to be progressed at the detailed design stage to enable a more accurate figure can be placed to the number of occupants and staff such that a wastewater treatment plant and disposal system can be accurately sized.

A preliminary sized MBBR treatment plant and land application disposal system has been sized based on the preliminary figures provided in the Civil Design Report.

In regard to the residential lifestyle Lots, as per the Civil Design Report attached as **Appendix I,** typical on-site effluent treatment systems are considered appropriate and will be used to service the residential lifestyle lots. Detailed designs of these will be provided at building consent stage for each of these lot.

Water Supply

The existing sites are currently serviced for water supply by a number of shallow bores and roof collection. Whilst the site has the potential to connect to the restricted rural water reticulation network located with Pencarrow Road and Hooker Road, this does not have the capacity to serve the precinct to the required level.

As the site will require a substantial volume of water for both human and equine consumption (250m^3 per day) along with irrigation needs (337m^3 per day) for the various horse tracks, it is proposed that an approximately 80m deep production bore be established on site. This will be required as a condition of consent. This is referenced in the following draft conditions provided within **Appendix T;**

- Condition 3 of **Appendix TH.**

To date, a test bore has been drilled and testing on the water quality been completed. Wallbridge Gilbert Aztec (WGA) have been engaged to provide a detailed hydrogeologist report (**Appendix GA.)** on the effects of the proposed bore will have on the surrounding aquifers and neighbouring bores.

For testing purposes, WGA have been instructed to proceed on the basis that all precincts would be supplied from a single production bore in the test bore's location.

The proposed water supply infrastructure and reticulation layout shown currently meets the sites requirements, however we understand in practice that as the design for the development progresses it is more likely that multiple bores will be established onsite reducing the draw down in a single location and also reducing the total length of water pipes to be installed.

Further details on the proposed groundwater take are contained within the Hydrological Effects Assessment prepared by WGA and attached as **Appendix GA.**

As detailed in the Civil Assessment Report attached as **Appendix I**, it is proposed that the rural lifestyle lots will be serviced for water supply by roof collection which will be stored in tanks located on each individual lot.

Detailed designs for water supply will be provided at building consent stage for each lot.

Stormwater

As detailed in the Civil Assessment Report attached as **Appendix I** the precinct will manage stormwater via on-site measures.

Stormwater generated from the racing, bloodstock and commercial precincts will be captured via catchpits and conveyed to bio-vegetated swales that dissect the site.

Stormwater will then be directed from the swales towards the lined irrigation ponds in the first instance which will ensure any sedimentation will have time to settle out of the water.

During large storm events or when the irrigation ponds are full, additional stormwater will be directed towards dry ponds located for retention.

The use of the irrigation and retention ponds are to ensure that stormwater flows leaving the site for all storms up to and including the 1% (1 in 100 year) AEP storm do not exceed the current stormwater flows.

As the site requires significant amounts of irrigation water to keep the proposed horse tracks in peak condition, it is proposed that where possible, rainwater will be harvested off roofs and hardstand areas and directed towards the irrigation ponds provided acceptable treatment occurs. This not only reduces the volume of stormwater leaving the site but also reduces the volume required to be drawn from the on-site bore.

We also note that as part of the horse track formations, subsoil drains are proposed to be installed. These subsoil drains ensure adequate drainage of the tracks during wet periods and directs this excess stormwater towards the irrigation ponds.

The track subsoil drains also have a secondary benefit in helping to capture fertiliser residue and keeping it onsite.

In regard to the senior living precinct, a mixture of below ground soakage systems and retention ponds are currently proposed to manage stormwater for the precinct. The ground water in this area is expected to be approximately 3.25m below ground level.

The suitability of soakage for this precinct will be confirmed as the design progresses.

The use of the irrigation and retention ponds are to ensure that stormwater flows leaving the site for all storms up
to and including the 1% (1 in 100 year) AEP storm do not exceed the current stormwater flows.

It is proposed that where possible, rainwater will be harvested off roofs and hardstand areas and directed towards the irrigation ponds within the senior living site. provided acceptable treatment occurs.

In relation to the residential lifestyle Lots, stormwater will be managed on a lot-by-lot basis, with detailed stormwater management designs prepared at the building consent stage for each lot.

Power and Telecommunications

Power and telecommunications connections will be provided to the Hub in consultation with utility providers.

Indicative plans are included within the preliminary electrical services report prepared by Innerscape.

This report is attached as **Appendix S.**

5.10 Archaeology

As detailed in the provided archaeological assessment prepared by Dr Warren Gumbley (**Appendix L**), the precinct site contains an identified archaeological site (ArchNZ reference: S15/573) which consists of a series of borrow pits and associated Māori-made soils created for the cultivation of kumara and possibly taro.

Development of the Hub will require the destruction of two burrow pits and an area of associated horticultural soil. Accordingly, an archaeological authority from Heritage NZ is required.

While opportunities were explored to preserve the entire archaeological site, due to site constraints and land requirements, ultimately part of the site was required to be destroyed.

Effort has been made to preserve the rest of the archaeological site within the training back track and protect this area from development via a covenant.

In addition to the archaeological assessment, the authority application is accompanied by an archaeological management plan and research and mitigation strategy, along with appropriate conditions of consent.

5.11 Signage

Signage will be proposed on site in a number of locations; however, this has not been subject to specific design at this stage. Examples of the proposed signage is illustrated in the architectural renders and is it is proposed that signage within the site will require detailed plans to be provided for as a condition of consent to the satisfaction of Waikato District Council.

No signage is proposed adjoining the site boundary with the Waikato Expressway.

This is referenced in condition in the following draft conditions provided within **Appendix T;**

- Condition 15 of **Appendix TB;**
- Condition 8 of **Appendix TD;**
- Condition 8 of **Appendix TE**

5.12 Landscaping

Significant landscaping is proposed both within the site and along the external site boundaries. The extent of the landscaping is illustrated on the Landscape Planting plan prepared by DSGE and includes individual boundary treatments for Pencarrow, Hooker and Duncan Roads. These plans are attached as **Appendix N.**

External boundary landscaping measures include a series of bunds with large trees and lower-level planting. Acoustic walls have also been demonstrated on the boundary plans for certain areas.

This boundary planting is proposed to be established as soon as practicable to assist with screening the development and mitigate potential dust effects during construction.

Detailed landscaping plans will be required to be provided as a condition of consent. This is referenced in the following draft conditions provided within **Appendix T;**

- Conditions 97-101 of **Appendix TB;**
- Conditions 84-87 of **Appendix TC;**
- Conditions 86-90 of **Appendix TD;**
- Conditions 73-85 of **Appendix TE;**
- Conditions 15-17 of **Appendix TF.**

6. ASSESSMENT AGAINST THE FTAA

Information Considered

In considering whether to grant the approvals sought in this application, the Panel must meet the requirements of Section 81 of the FTAA, which includes applying the decision-making clauses in Schedule 5.

This AEE for the Waikato Greenfield Racing Hub has been prepared considering the information referred to in s81(2)(a) of the FTAA to the extent it is currently available.

This includes:

- all of the technical assessments and proposed mitigation measures supporting the application
- the CVAs received from Ngaati Haua and Ngaati Koroki Kahukura and the MOU between mana whenua and the applicant
- assessment of the Hub against relevant Treaty settlements and iwi planning documents
- feedback received from engagement and how this has informed the design of the Hub.

Where the Panel must Decline Approval

The Panel must decline an approval if 1 or more of the situations in s 85(1) apply.

The situations relevant to all types of approvals that can be sought under the FTAA are:

- *The approval is for an ineligible activity*

The Hub does not include any ineligible activity.

- *The Panel considers that granting the approval would breach obligations relating to Treaty settlements and recognised customary rights*

The Hub does not breach any obligation relating to treaty settlements or customary rights.

- *In the case of an approval for a resource consent, the approval must be declined if it is in an area covered by clause 17(5) Schedule 5 in an area*

The Hub is not related to a coastal permit.

The Panel may also decline an approval if the Panel forms the view that:

- *The activity or activities for which the approval is sought would have one or more adverse impacts; and*
- *Those adverse impacts are sufficiently significant to be out of proportion to the project's regional or national benefits that the Panel has considered, even after taking into account any conditions that the Panel may set in relation to those adverse impacts, and any conditions or modifications that the applicant may agree to or propose to avoid, remedy, mitigate, offset, or compensate for those adverse impacts.*

Based on the above assessment, the Hub will not result in adverse effects that cannot be sufficiently mitigated or offset to an extent that would be out of proportion to the Hub's regional benefits.

As per subsections (3) and (4), adverse impact means any matter considered by the Panel in complying with Section 81(2) that weighs against granting the approval.

Purpose of the FTAA

The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with significant regional benefits by streamlining consenting and approval processes.

Resource Consents Sought – Parts 2, 3, 6, 8 and 10 of the RMA 1991

This section of the application is provided in accordance with clauses 5(1)(g) and 17 of Schedule 5 of the FTAA.

Part 2 of the RMA 1991

Part 2 describes the purpose and principles of the RMA.

This section of the application provides an overall assessment of the activity against sections 5, 6 and 7 of Part 2 of the RMA, as required by clause 5(1)(g) of Schedule 5 of the FTAA.

Section 5 of Part 2 outlines the purpose of the RMA and requires assessment as to whether a proposal promotes the sustainable management of natural and physical resources.

This means managing natural and physical resources in a way that enables people and communities to provide for their social, cultural and economic well-being and health and safety while ensuring that these

resources are available for future generations by protecting the life supporting capacity of ecosystems, and avoiding, remedying or mitigating adverse effects on the environment.

This section requires applicants to manage the use, development and protection of natural and physical resources in a way that enables people and communities to provide for their social, cultural and economic well-being and health and safety while sustaining those resources for future generations, protecting the life supporting capacity of ecosystems, and avoiding, remedying or mitigating adverse effects on the environment.

The Hub is consistent with these objectives as it will provide for the social and economic well-being of people and communities by supporting a regionally significant industry, increasing expenditure within the Waikato region, providing employment and income within the local economy and indirectly provide additional housing capacity both within the development, and within the existing urban environments of Hamilton, Cambridge and Te Awamutu.

The Hub has been designed to incorporate infrastructure and design features that enhance the life-supporting capacity of ecosystems, mitigate adverse effects and enhance environmental outcomes.

Section 6 identifies matters that are of national importance.

Of relevance to this application are:

The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.

Development of the Hub will result in the rehabilitation and protection of the Kahikatea stand and natural wetland within the site as per the provided ecological impact assessment and management plan.

In addition to the above, a Bat Management Plan (BMP) is proposed to offset an adverse impact on bat habitat as a result of any adverse lighting impacts on the kahikatea stand as bat habitat.

The other section 6 matters are not relevant to this application.

Section 7 of the RMA identifies a number of "other matters" to be given particular regard by Council and includes (but are not limited to) Kaitiakitanga, the efficient use of natural and physical resources, the maintenance and enhancement of amenity values, and maintenance and enhancement of the quality of the environment.

The Hub is considered to be consistent with the matters in section 7 as it enables and facilitates the efficient use and development of land, will not compromise the visual amenity of the environment and will protect and enhance natural water resources.

When considering Section 8 and the principles of the Treaty of Waitangi, the proposal will not generate any significant adverse effects on the natural environment or on any sites of cultural importance that are not mitigated or used for research and information gathering purposes. Furthermore, the MoU prepared between the applicant and mana whenua establishes a framework for ongoing partnership and engagement through the lifespan of the project.

The assessment above, demonstrates that the overall Hub development will be constructed in a manner which will not result in significant adverse environmental effects that cannot be mitigated of offset and will have significant positive effects for the region.

Parts 3, 6, 8 and 10 of the RMA 1991

This section of the application provides an overall assessment of the activity against Parts 3, 6, 8 – 10 of the RMA, as required by Clause 17(1)(b) of Schedule 5 of the FTAA.

Part 3 – Duties and Restrictions under the RMA

Part 3 of the RMA relates to the duties and restrictions under the RMA, with particular regard to use of land, subdivision, discharge of contaminants, uses of beds of rivers, and contravention of designations.

All approvals sought are all approvals required under Section 9, 11, 14 and 15 of the RMA;

- The precinct includes land use activities that do not meet permitted activity standards under the WDP. Resource consent has been appropriately sought for the development, and associated infrastructure. The proposal includes a comprehensive assessment of effects and mitigation measures to ensure the land use is suitable and sustainable.

- The proposal includes a masterplanned layout that ensures efficient land use, connectivity, and integration with the surrounding environment and the wider Hub development. The application also includes a comprehensive assessment of effects and mitigation measures for each precinct to ensure the land use is suitable and sustainable. As a result, Section 9 of the RMA has been complied with;

As a result, the requirements of Section 9 of the RMA has been complied with;

- The site has been identified as a 'piece of land' under Regulation 5(7) due to historical agricultural activities. Accordingly, a Discretionary Activity consent has been applied for under the NESCS. The application includes a CSMP and an ASSMP, which outline procedures for remediation, health and safety, and environmental protection during any future soil disturbance.

This is consistent with Section 15 of the RMA;

- Stormwater generated from the precinct will be treated through the proposed stormwater network, which incorporates bio vegetated swales and stormwater ponds to manage water quality and avoid adverse effects. No uncontrolled discharges are proposed as a result of the precinct and all discharges of wastewater and stormwater will be managed appropriately in accordance with best practice and relevant standards.

- Both acoustic effects of the overall development and construction noise and vibration effects have been assessed (**Appendix P)** and can be successfully mitigated through the preparation of a noise management plan (NMP) and a construction noise and vibration management plan (CNVMP). These management plans will be required to be provided as conditions of consent. Therefore, Section 16 of the RMA has been complied with;

- Preparation of the above management plans appropriately mitigates potential noise impacts by outlining requirements to manage acoustic effects of the development. This ensures that any construction related noise will be effectively mitigated through best practice measures, thereby fulfilling the duty to avoid unreasonable noise effects on the environment.

  As a result, the requirements of Section 17 of the RMA are complied with.

- The design of the precinct has been informed by the provided technical assessments to avoid or mitigate adverse effects and through feedback from relevant stakeholders.

  As a result, Section 17 of the RMA has been complied with.

It is considered that the Hub meets Part 3 of the RMA.

Part 6 – Resource Consents, Proposals of National Significance and Aquaculture Moratorium

Part 6 of the RMA relates to resource consents, proposals of national significance and aquaculture moratorium.

Resource consents are the aspect of Part 6 that is relevant to the Hub.

The Hub is considered to be consistent with and is assessed against the resource consent framework identified within Part 6 of the RMA, except where such assessment is not required as directed by the FTAA legislation (such as assessing environmental effects under clause 6 of Schedule 5 of the FTAA, or the exclusion of s104D under clause 17 schedule 5 of the FTAA).

The assessments undertaken in this application demonstrate that the precinct meets the requirements of Part 6 of the RMA.

Part 8 – Designations and Heritage Orders

Part 8 of the RMA relates to designations and heritage orders. No designations nor heritage orders apply to the site or are proposed.

Therefore, Part 8 of the RMA is not relevant to the Hub.

Part 9 – Water Conservation Orders, Freshwater Farm Plans, and Freshwater Ecosystems

Part 9 of the RMA relates to water conservation orders, freshwater farm plans and use of nitrogenous fertiliser.

Part 9 of the RMA is not relevant to the Hub.

Part 10 – Subdivision and Reclamations

Part 10 of the RMA relates to subdivision and reclamations.

All of the provisions addressed below are relevant to the subdivision approvals sought:

- Specific conditions have been proposed in relation to the subdivision consent approval that is sought. These conditions align with Section 220 of the RMA;
- Some of the conditions proposed provide for the issue of consent notices in accordance with Section 221 of the RMA;
- Easements are shown on the scheme plans and accord with standard RMA practice; and
- All boundaries and proposed allotments are shown on the scheme plans

Conditions of consent will ensure that the proposal is consistent with s223 and s224 of the RMA and also provides for the granting of easements where required.

Other Legislation

There is no other legislation relevant to the RMA approvals being sought as part of this application.

Decision on Whether to Grant the Approvals Sought

As outlined above, none of the situations that require the Panel to decline an application are applicable to the subject site.

Assessment of the application against Sections 81 and 85 support a decision to grant the approvals sought in the application.

The Hub provides several benefits of regional significance, which are described in the EIA and section 13 below.

In particular, the Hub would:

- support a significant regional industry
- provide significant economic benefits to the Waikato, as outlined in section 13 below (across both the racing industry and the wider community)
- increase housing supply within the Waikato Region through the consolidation of existing racing infrastructure, including through land currently located within existing urban limits

- improve stormwater management and ecological restoration which would improve the overall health of the Waikato River catchment, mitigate flood risk, and enhance biodiversity in an area previously degraded through primary production

- provide for recognition of the cultural significance of the site and ongoing partnership - consistent with Treaty of Waitangi principles.

The potential adverse effects of the proposal have been avoided, mitigated both through development design and the mitigation measures proposed through conditions of consent.

The proposal is also generally consistent with relevant planning documents. Exceptions are discussed in section 14 below.

7. ASSESSMENT AGAINST THE FTAA – ARCHAEOLOGICAL AUTHORITY

Information Considered

In considering whether to grant the approvals sought in this application, the Panel must meet the requirements of Section 81 of the FTAA, which includes applying the decision-making clauses in Schedule 5.

This AEE for the Waikato Greenfield Racing Hub has been prepared considering the information referred to in s81(2)(a) of the FTAA to the extent it is currently available.

This includes:

- all of the technical assessments and proposed mitigation measures supporting the application

- the CVAs received from Ngaati Haua and Ngaati Koroki Kahukura and the MOU between mana whenua and the applicant

- feedback received from engagement and how this has informed the design of the Hub.

Where the Panel must Decline Approval

The Panel must decline an approval if 1 or more of the situations in s 85(1) apply.

The situations relevant to all types of approvals that can be sought under the FTAA are:

- *The approval is for an ineligible activity*

The archaeological authority is not an ineligible activity.

- *The Panel considers that granting the approval would breach obligations relating to Treaty settlements and recognised customary rights*

The archaeological authority does not breach any obligation relating to treaty settlements or customary rights.

- *In the case of an approval for a resource consent, the approval must be declined if it is in an area covered by clause 17(5) Schedule 5 in an area*

The archaeological authority is not related to a coastal permit.

The Panel may also decline an approval if the Panel forms the view that:

- *The activity or activities for which the approval is sought would have one or more adverse impacts; and*
- *Those adverse impacts are sufficiently significant to be out of proportion to the project's regional or national benefits that the Panel has considered, even after taking into account any conditions that the Panel may set in relation to those adverse impacts, and any conditions or modifications that the applicant may agree to or propose to avoid, remedy, mitigate, offset, or compensate for those adverse impacts.*

Based on the above assessment, the archaeological authority application will not result in adverse effects that cannot be sufficiently mitigated or offset to an extent that would be out of proportion to the Hub's regional benefits.

As per subsections (3) and (4), adverse impact means any matter considered by the Panel in complying with Section 81(2) that weighs against granting the approval.

Purpose of the FTAA

The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with significant regional benefits by streamlining consenting and approval processes.

For the reasons set out in this application, the Hub, and the specific approvals sought to enable its development are considered to meet the purpose of the Act.

Archaeological Authority Sought – HNZPT Act

This section has been provided in accordance with subclauses 4(1) and 4(2) of Schedule 8.

The authority application is considered to be consistent with the purpose and principles of the HNZPTA as follows.

Section 59(1)(a)

The authority is necessary to facilitate development of the site and will be undertaken to avoid or minimise, where practicable, areas where archaeological material is likely to be present.

Alternative design options and staging of earthworks have been considered to reduce adverse effects on known and potential archaeological values. This has resulted in a larger area of the archaeological site being preserved than was originally proposed in the Referral Application.

Section 47(1)(a)(ii) and (5) Effects

An assessment of effects has been undertaken in section 13 of this report. In summary, the potential adverse effects on archaeological values are considered to be avoided as far as practicable and minimised through the implementation of the AMP and ARMS and are therefore acceptable overall given the nature of the recorded archaeological site and archaeological monitoring and recording proposed.

Statement of General Policy

The statement identified as relevant to the Hub is 'The Administration of the Archaeological Provisions'. It is considered that the Archaeological Assessment provided by Dr Warren Gumbley has provided information and assessment which is in accordance with the general policy, and that appropriate consultation with relevant iwi authorities and HNZPT has been undertaken.

Therefore, it is considered that the proposal is in accordance with this statement of general policy.

Decision on Whether to Grant the Approvals Sought

As outlined above, none of the situations that require the Panel to decline an application are applicable to the subject site.

Assessment of the application against Sections 81 and 85 support a decision to grant the approvals sought in the application.

The Hub provides several benefits of regional significance, which are described in the EIA and section 13 below.

The potential adverse effects on archaeological values are considered to be avoided as far as practicable and minimised through the implementation of the AMP and AVMP and overall acceptable given the nature of the recorded archaeological site and archaeological monitoring and recording proposed.

The relevant test for declining an approval in section 85 of the FTAA is whether the adverse impacts of the proposal are sufficiently significant to be out of proportion to the project's regional or national benefits, noting that a panel cannot form the view that an adverse impact meets this threshold solely on the basis that the adverse impact is contrary to a relevant planning or policy document.

In our view, the adverse impacts arising from the Project in particular the proposed modifications and destructions of archaeological sites are far outweighed by the extensive significant regional benefits that will be generated by the Project.

8. CONSENT DURATION, CONSTRUCTION AND STAGING

Section 43 of the FTAA requires the Substantive Application to:

- *State whether the application relates to a priority project, and if so, states specific requirements (s43(h));*
- *With reference to the requirements of s13(4), include a statement of whether the Hub is planned to proceed in stages and if so, an outline of the nature and timing of the stages, together with other requirements that relate to the referral application (s43(2)).*

The Hub application is **NOT** a priority project.

While not a staged development in the traditional sense, the Hub is intended to proceed in phases of construction for the racing precinct. This phasing is detailed in the phasing plan attached to the application as **Appendix NB** and is discussed in detail below of the application.

For the avoidance of doubt, while the Hub is structured into precincts and will proceed in phases in terms of physical construction, this Substantive Application under the FTAA is for the entire development.

A separate Substantive Application will not be lodged for each construction phase or precinct of the Hub.

Indicative Construction Phasing

Due to the large scale of the precinct, the actual construction of the various buildings and roads (public and private) will be coordinated and constructed in a phased manner.

Each section of road is intended to be incrementally constructed to provide the necessary access to each precinct 'super lot' of the subdivision and to service the proposed buildings, as well as logically connecting to any preceding phases.

The indicative phasing for the Project is discussed further below.

It should be noted that the phasing discussed below is not restricted to a strict order – ie phase B may occur before phase A if required.

For the avoidance of doubt, while aspects of the precinct will proceed in stages in terms of subdivision and physical construction, this substantive application under the FTAA is for all stages of the Project.

A separate substantive application will not be lodged for each stage of the Hub.

Construction Phase A - Thoroughbred racing and raceday facilities, bulk services, preparing *super* lots and meeting *r*esource *c*onsent conditions)

This phase of construction will consist of the following aspects

- Phase A1 - Bulk site earthworks sufficient to ensure stormwater for the final development flows through the site
- Phase A2 - Bulk services for the racing precinct (water, power, stormwater, telecommunications)
- Phase A3 - Thoroughbred Racing Tracks (2 main grass tracks and service track) with irrigation, irrigation pond, camera towers, LED screen
- Phase A4 - Underpass under the main tracks (Option to defer Underpass until Phase C and include level track crossing to infield)
- Phase A5 - Thoroughbred raceday facilities (including Tie Ups, float park, Admin building, services, horse paths, etc)
- Phase A6 - Semi permanent events centre (as per Wyong Racing Club - 10-year lifespan), Judges tower and event lawn
- Phase A7 - Vehicle Entrances, roading, carparking, footpaths, gates and swales
- Phase A8 - Landscaping around perimeter of whole site and Racing facilities
- Phase A9 - Thoroughbred maintenance facility
- Phase A10 - Prepare super lots for sale (Senior Living, Rural Residential, Bloodstock, Commercial) with engineering plan approval
- Phase A11 - Existing public road upgrades
- Phase A12 - Meeting resource consent conditions for the racing precinct

This phase is illustrated in red in **Figure 26** below:



Figure 26: Construction Phase A

Construction Phase B – Harness racing track and facilities

This phase of construction will consist of the following aspects:

- B1- Earthworks within harness site
- B2 - Main and training track, with camera towers, LED screen, lighting and irrigation pond
- B3 - Training stables and training facilities
- B4 - Harness events centre, judges tower and event lawn
- B5 - Harness maintenance facility
- B6 - Services (water, power, stormwater, communications, sewer)
- B7 – Carpark
- B8 – Internal landscaping

This phase is illustrated in red in **Figure 27** below:

Figure 27: Construction Phase B

Construction Phase B1 - Harness racing track and facilities

This phase of construction will consist of the following aspects and will occur if phase B occurs before phase A:

- B1- Earthworks within harness site
- B2 - Main and training track, with camera towers, LED screen, lighting and irrigation pond
- B3 - Training stables and training facilities
- B4 - Harness events centre, judges tower and event lawn
- B5 - Harness maintenance facility
- B6 - Services (water, power, stormwater, communications, sewer)
- B7 – Carpark
- B8 - Landscaping – internal
- B9 - Raceday facilities (including tie Ups, float park, services, horse paths, etc)
- B10 - Admin - Temporary buildings until permanent shared Admin constructed
- B11 - Roading - Vehicle entrance to Pencarrow Rd

This phase is illustrated in red in **Figure 28** below:



Figure 28: Construction Phase B1

Construction Phase C – Thoroughbred training tracks and training facilities

This phase of construction will consist of the following

- C1 - Earthworks for training facilities
- C2 - Training Tracks inside the Main Track (synthetic, sand and plough) with lighting

- C3 - Backtrack tracks (grass, sand, plough, warmup track, bush track) with Lighting
- C4 - Training Barns, Training Tie Ups and Track Work observation huts
- C5 - Equine Pool
- C6 - Services (water, power, stormwater, communications, sewer)
- C7 - Vehicle entrance to Duncan Rd, roading, horse walkways, float and carparks
- C8 - Landscaping – internal
- C9 - Vet building - excluded - commercial lease

This phase is illustrated in red in **Figure 29** below:



Figure 29: Construction Phase C

Consent Duration

The Applicant is seeking the following consent durations in which to give effect to the resource consents.

- Land Use – 10-year lapse date.
- Subdivision – 10-year lapse date.
- Water Take – 10-year duration.
- Land Disturbances(s) earthworks – 10-year duration.

The overall construction programme is proposed to be 3 years for a 2032 opening, assuming a 2029 start to construction.

Other Activities

In accordance with Schedule 5, clause 5(1)(e) of the FTAA, there are no other activities that form part of the proposal to which this consent application relates.

Other Approvals Required

Archaeological Authority

An application to Heritage New Zealand for an archaeological authority is proposed, which is supported by an archaeological assessment, management plan and research strategy, along with appropriate conditions of consent. These documents are attached as **Appendices L, LA and LB** for the archaeology documents, draft conditions are provided in **Appendix T** with **Appendix TA** containing the authority draft conditions.

This authority is proposed to be for the identified archaeological site (ArchNZ reference: S15/573) within Section 2 SO 547526 [RT 1027516] which is located within Lot 3 of the super Lot subdivision.

No other resource consents, notices of requirement for designations, or alterations to designations are required to be obtained by the applicant prior to any works commencing on the site.

Mitigation Measures, Management Plans and Monitoring

Clause 6(1)(d) and (g) of Schedule 5 of the FTAA requires that an application provides a description of the mitigation measures to be undertaken to help prevent or reduce the actual and or potential effects of the activity, and a description of any monitoring to be undertaken.

There are various methods to manage and mitigate the effects associated with the proposal. For some effects, this involves preparing management plans that dictate how specific activities will be carried out. These management plans can also outline future monitoring measures

For other effects, these have been managed through requiring engineering design approvals or consent conditions that require ongoing monitoring.

Some management plans have been prepared as drafts and are attached to this application, within final versions required to be certified by Council prior to works commencing.

Any outstanding management plans will be prepared and provided in accordance with consent conditions for Council certification:

Racing Operations

- Raceday Operations Plan (Thoroughbred) – this outlines the activity on site during a thoroughbred race day and the responsible person for each activity. This is attached as **Appendix QE**

- Daily Track Maintenance and Training Operations Plan (Thoroughbred) – this outlines the typical daily training day occurring on-site for thoroughbred training. This is attached as **Appendix QA**

- Raceday Operations Plan (Harness) – this outlines the activity on site during a harness race day and the responsible person for each activity. This is attached as **Appendix QF**

- Daily Track Maintenance and Training Operations Plan (Harness) – this outlines the typical daily training day occurring on-site for harness training. This is attached as **Appendix QG**

Construction and Earthworks

- Construction Management Plan (CMP) – this will outline that the appropriate management procedures and construction methods are identified in order to avoid adverse effects on the environment from bulk earthworks and construction works. A draft CMP is attached as **Appendix QH**

- Construction Noise and Vibration Management Plan (CNVMP) – this will include measures to avoid and mitigate effects on surrounding receivers during construction such as communication procedures, machinery selection, hours of work, works programme and so on. A draft will be provided as a condition of consent

- Erosion and Sediment Control Plan (ESCP) – this will outline staging of earthworks and the means of controlling the earthworks to ensure sediment is contained during earthworks.

  This can be finalised prior to works commencing and other standard conditions of consent in accordance with best practice can be imposed. A draft ESCP is attached as **Appendix QB.**

- Groundwater Dewatering Monitoring and Contingency Plan (GMMCP) – this will outline appropriate measures to mitigate any potential drawdown and settlements effects on the surrounding land, buildings and underground services. A draft GMMCP will be required to be provided as a condition of consent.
- Stormwater Management Plan (SWMP) – this outlines stormwater management considerations ensuring that hydraulic neutrality is maintained and stormwater is treated through the management process. A draft SMP is attached as **Appendix QI.**

Transportation

- Construction Traffic Management Plan (CTMP) – this will include measures to avoid and mitigate effects on the road network around the site, including truck routes, access points and traffic management measures. A draft CTMP is provided in **Appendix QD**;

- Event Traffic Management Plan (ETMP) - this will include measures to avoid and mitigate effects on the road network around the site during large events, including truck routes, access points and traffic management measures. A draft ETMP is attached as **Appendix QC.**

Contaminated Land and Acid Sulfate Soils

- Contaminated Site Management Plan (CSMP) – these outlines appropriate measures that will be in place to manage and control disturbances of contaminants and remediation. The plans will include detailed measures that will be in place to protect the environment, surrounding people and workers during the works. A draft CSMP is attached as **Appendix JA**

- Acid Sulfate Soil Management Plan (ASSMP) – this outlines further testing protocol and appropriate measures that will be in place to manage and control acid sulfate soils if found within the site. A draft ASSMP is attached as **Appendix JB**

Ecological

- Ecological Management Plan (EMP) – this will provide a framework for implementing biodiversity restoration, enhancement, maintenance and monitoring within the Kahikatea stand and wetland area, along with other ecological management measures. This is attached as **Appendix HA**

- Fish Management Plan (FMP) – this will provide for the rescue and relocation of indigenous fish from the artificial drainage network within the site where fish may be present. The draft FMP is provided as **Appendix HB**

- Bat Management Plan (BMP) – this will mitigate adverse effects on bats through specific measures and offsetting – The draft BMP is provided as **Appendix HC**

- Lizard Management Plan (LMP) – this will mitigate adverse effects on lizards (if found) through specific mitigation and relocation measures – The draft LMP is provided as **Appendix HD.**

Archaeological

- Archaeological Management Plan (AMP) – this sets out procedures to be followed during earthworks and construction activities within and adjacent to known archaeological sites. It includes requirements for archaeological monitoring, investigation, recording, and reporting of archaeological material.

  It also includes requirements for archaeological monitoring, investigation, recording, and reporting of archaeological material. The draft AMP is provided as **Appendix LA.**

- Archaeological Research and Mitigation Strategy (ARMS) – this will be used during the archaeological investigation of the two borrow pits within the site. This is attached **as Appendix LB.**

Cultural

Cultural Management Plan (CMP) - guides cultural monitoring, ongoing engagement, and the protection of cultural values throughout the development. This will be required to be provided as a condition of consent. This is referenced in the following draft conditions provided within **Appendix T;**

- Condition 28 of **Appendix TB;**
- Condition 27 of **Appendix TC;**
- Condition 21 of **Appendix TD;**
- Condition 21 of **Appendix TE.**

Temporary Events

Event Management Plan (EMGP) **–** This management plan will outline the requirements that will need to be complied within in regard to temporary events not related to racing that are proposed to be held on the site. This will be required to be provided as a condition of consent. This is referenced in the following draft conditions provided within **Appendix T;**

- Conditions 64-65 of **Appendix TB;**
- Condition 62 of **Appendix TD.**

Draft Consent Conditions

Clause 5(1)(k) of Schedule 5 of the FTAA requires the application to include consent conditions proposed by the Applicant.

Proposed conditions of consent are attached to the application as **Appendix T**

Table 7 below provides an overview of the consents required for each precinct. Further details of the consent triggers are included in section 9 of this application.

Part 2 – Subdivision	**Part 3 – Racing Precinct**	**Part 4 – Senior Living Precinct**	**Part 5 – Bloodstock Precinct**	**Part 6 – Commercial Precinct**
NESCS Consent	NECS Consent	NESCS Consent	NESCS Consent	NESCS Consent
Waikato DC Subdivision Consent	Waikato DC Land Use Consent	Waikato DC Land Use Consent	Waikato DC Land Use Consent	Waikato DC Land Use Consent
Waikato DC Land Use Consent	Heritage NZ Archaeological Authority	Waikato Regional Council Consent – Wastewater	Waikato Regional Council Consent –	Waikato DC Subdivision Consent

		Discharge Permit	Diversion Permit	
Heritage NZ Archaeological Authority	Waikato Regional Council Consent – Groundwater Take – Dewatering	Waikato Regional Council Consent – Surface Take	Waikato Regional Council Consent – Wastewater Discharge Permit	Waikato Regional Council Consent – Diversion Permit
	Waikato Regional Council Consent – Groundwater Take	Waikato Regional Council Consent – Diversion Permit		Waikato Regional Council Consent – Wastewater Discharge Permit
	Waikato Regional Council Consent – Surface Take			
	Waikato Regional Council Consent – Stormwater Discharge Permit			
	Waikato Regional Council Consent – Wastewater Discharge Permit			
	Waikato Regional Council Consent – Diversion Permit			
	Waikato Regional Council Consent – Soil Disturbance			
	Waikato Regional Council Consent – Drilling			
	Waikato Regional Council Consent – Drilling			

Table 7: Consents required relative to each development precinct.

The proposed consent conditions for the Hub are based on standard Waikato District Council (WDC) and Waikato Regional Council (WRC) wording for the various consents sought in the application and have been subject to consultation with WDC and WRC.

The proposed consent conditions include conditions to:

- *Appropriately manage adverse effects, including providing mitigation to prevent or reduce adverse effects during and after construction in accordance with clause 6(1)(d) of Schedule 5; and*
- *Provide for monitoring as required by clause 6(1)(g) of Schedule 5.*

The conditions are not considered to be more onerous than necessary and comply with Section 83 with reference to Section 81(2)(d).

It is considered that they meet the requirements of the Act and that the Panel may grant the resource consent subject to the conditions in accordance with Section 81(1)(a) of the FTAA.

9. RESOURCE CONSENT APPROVALS (S42(4)(A))

Overview

This section of the application is provided in accordance with Schedule 5, clause 5(1)(h) of the FTAA which requires an assessment of the activity be provided against relevant provisions of the following documents provided in Schedule 5, clause 5(2) of the FTAA:

(a) A national environmental standard.

(b) Other regulations made under the RMA.

(c) A national policy statement.

(d) A New Zealand coastal policy statement.

(e) A regional policy statement or proposed regional policy statement.

(f) A plan or proposed plan.

(g) A planning document recognised by a relevant iwi authority and lodged with a local authority.

Where relevant, the Hub has been considered against the above documents in the following sections of this report as well as against the items listed in Schedule 5, clause 5(3)(a)-(c).

The application seeks all resource consents necessary for the construction and ongoing operation of the Hub.

The list of consents considered to be required is outlined below in section 2. 7

For completeness, this application also seeks consent for any matters that are not listed below but which are subsequently identified as being necessary.

In summary, the Hub requires: **Prohibited Activity** consent overall under the Operative and Operative in Part Waikato District Plans, a **Discretionary Activity** consent under the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health and a **Discretionary Activity** consent under the Waikato Regional Plan.

District and Regional Resource Consents Required

Waikato District Plan (Operative in Part)

While the WDP 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 subdivision rules relevant to the rural zone that are subject to appeal relate to prohibited subdivision, general subdivision, boundary relocations, rural hamlet subdivisions and subdivision building platforms.

There are no live appeals against the General Rural Zone Rules. Therefore, any corresponding Rural Zone rules in the Operative District Plan are treated as inoperative pursuant to Section 86F of the Resource Management Act 1991 (RMA).

That being the case, the consents sought are as detailed below and in the (WDP) Rules Assessment attached as **Appendix U**.

Racing Precinct

Waikato District Plan (Operative in Part)

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 vet and farrier buildings within the racing precinct and the bloodstock precinct fall under this definition

- A **Restricted Discretionary Activity** pursuant to **Rule GRUZ-S5 – Building Height –** The racing precinct requires 48 lighting masts across both thoroughbred and harness tracks. These lighting masts range between 20.5m – 24.5m high, which exceeds the 15m max structure height allowed for in the Rural Zone. One camera tower is proposed that is 12m in height but is located within 50m of the northern site boundary. This also requires resource consent.

- A **Restricted Discretionary Activity** consent is required pursuant to **Rule GRUZ-S9 – Building Coverage –** Consent is required pursuant to the above rule to exceed the allowable building coverage within the site by approximately 35,000m^2.

- A **Restricted Discretionary Activity** pursuant to **Rule GRUZ-S12 – Building Setbacks –** The district plan requires a minimum 25m setback from every boundary. A blanket consent is proposed to allow this to be reduced to 10m from all internal boundaries to precincts created as part of the overall Hub development**.**

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 racing precinct 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.

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 generally, race meetings and temporary events will comply with the noise limits specified in **NOISE-R8** below. However, to cover all outcomes, consent is being applied for to infringe this rule.

Temporary Activities

- **A Discretionary Activity** consent is applied for pursuant to **TEMP-R5 – Temporary Events** to allow for temporary events within the racing precinct that do not meet the permitted activity standards in regard to the number of occurrences per year and hours of operation.

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 1,000m^3 over an area of 2,000m^2 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 exceed a maximum volume of 500m^3 in a single 12-month period.

Associated Permitted Activities – Racing Precinct

The WDP allows for the following permitted activities which form part of the Hub application:

- **GRUZ – R8 - Equestrian centre** - this activity is defined as *land or buildings where people:*
  (a) Can ride or learn to ride horses, for a fee; or
  (b) Competitively race or show horses (including trotting, galloping, showjumping, cross-country and dressage).

- **GRUZ – R9 - Horse training centre** – this activity is defined as – *facilities for the housing and training of horses. It may involve some form of training track and arenas (both indoor and outdoor) but does not include any form of racing or show jumping or other activity to which the general public is permitted, whether or not an entrance fee is paid.*

- **GRUZ-R23 – Construction, Demolition and Alteration of a Building or Structure –** The existing buildings within the overall site will be demolished as part of the redevelopment of the site. This is allowed for as a Permitted Activity.

- **GRUZ -S3 – Building Height – General –** The General Rural Zone allows for buildings up to 15m in height, with buildings located within 50m of the site boundary being required to have a maximum height of 10m. The buildings proposed as part of the precinct comply with this standard. The proposed conditions of consent in **Appendix TB** include conditions to ensure compliance will be achieved.

- **GRUZ – S8 – Height in Relation to Boundary –** The General Rural Zone requires buildings to not protrude through a building envelope consisting of a 45 degree angle commencing at 2.5m at the site boundary. The buildings proposed as part of the precinct are expected to comply with this standard. The proposed conditions of consent in **Appendix TB** include conditions to ensure compliance will be achieved.

Waikato Regional Plan

The consents sought are as detailed below and in the (WRC) Rules Assessment attached as **Appendix UA**.

The following regional consents are required for the racing precinct.

Chapter 3 – Water module

- **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**.

- **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**.

- **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** –A synthetic track is proposed to be constructed, therefore 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 have confirmed this it agrees with 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 likely not comply with the requirements of **5.1.5**

- **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 for the synthetic track for importation of sand to mix with material consented under **3.5.4.5.**

Subdivision

The subdivision component of the application triggers consent under the following WDP rules:

- **A Discretionary Activity** boundary relocation pursuant to **Rule SUB-R46**, is proposed to create the precinct super Lot layout. This is a Discretionary Activity due to more than 15% of the site containing highly-productive soil.

- A **Prohibited Activity** subdivision is proposed pursuant **SUB-R40 Prohibited Subdivision** to create the 34 rural-residential Lots as the Title subject to the proposal will have a Title issue date post December 1997 and contain high-class soil with more than one additional Lot being created.

  Boundary Setbacks

- A **Restricted Discretionary Activity** consent is required pursuant to **GRUZ-S12 – Building Setbacks – All Boundaries.** A blanket land use consent for reduced 5m setbacks from all boundaries is proposed to be applied for the Lots created as part of the residential lifestyle precinct.

Operative Waikato District Plan

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

- A **Discretionary Activity** pursuant to **Rule 25.71A,** to undertake a boundary relocation between the existing Records of Title to create precinct 'super lots' and amalgamate land with 101 Hooker Road**.** This is a Discretionary Activity due to the titles not being in common ownership.

- 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 as a result of the residential lifestyle precinct.

Senior Living Precinct

The following resource consents are required in relation to the Senior Living Precinct under the WDP.

General Rural Zone

- 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**. Comprehensive senior living as an activity that 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 -** Consent is required pursuant to the above rule to exceed the allowable building coverage within the site by 13,205m^2.

- A **Restricted Discretionary Activity** consent is required pursuant to **GRUZ-S12 – Building Setbacks – All Boundaries.** A blanket land use consent for reduced 5m setbacks from all boundaries is proposed to be applied for the buildings constructed as part of the senior living precinct.

- 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.

- 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 1,000m^3 over an area of 2,000m^2 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 exceed a maximum volume of 500m^3 in a single 12-month period.

Associated Permitted Activities – Senior Living Precinct

The Operative in Part Waikato District Plan allows for the following permitted activities which form part of the precinct application:

District Wide Matters

LIGHT-R2 – Glare and Artificial Light Spill - The precinct will involve the provision of external lighting around the buildings that will comply with the above standard for lighting of the precinct. Lighting activities that comply with all the relevant permitted activity standards is provided for as a permitted activity pursuant to the above rule. The above standard is captured in the proposed consent conditions in **Appendix TC** to ensure compliance will be achieved.

- **Noise-R8 – Noise – General -** The precinct involves both activities that will emit operational noise at all adjacent properties that will comply with the relevant permitted activity standards. The acoustic report attached as **Appendix TC** demonstrates how the relevant permitted activity standards will be complied with. The proposed conditions of consent in **Appendix TC** include relevant noise conditions to ensure compliance will be achieved.

General Rural Zone

- **GRUZ-R23 – Construction, Demolition and Alteration of a Building or Structure –** The existing buildings within the overall site will be demolished as part of the redevelopment of the site. This is allowed for as a Permitted Activity.

- **GRUZ -S3 – Building Height – General –** The General Rural Zone allows for buildings up to 15m in height, with buildings located within 50m of the site boundary being required to have a maximum height of 10m. The buildings proposed as part of the precinct comply with this standard. The proposed conditions of consent in **Appendix TC** include conditions to ensure compliance will be achieved.

- **GRUZ – S8 – Height in Relation to Boundary –** The General Rural Zone requires buildings to not protrude through a building envelope consisting of a 45 degree angle commencing at 2.5m at the site boundary. The buildings proposed as part of the precinct are expected to comply with this standard. The proposed conditions of consent in **Appendix TC** include conditions to ensure compliance will be achieved.

Waikato Regional Plan

The following regional council consents are required for the senior living precinct

Chapter 3 – Water module

- **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 within the precinct.

- **Wastewater Discharge** – Consent is required pursuant to **Rule 3.5.7.7** for wastewater discharge to land as a **Discretionary Activity**.

Bloodstock Precinct

The following resource consents are required in relation to the Bloodstock Precinct under the WDP.

- A **Restricted Discretionary Activity** consent is required pursuant to **Rule GRUZ-R38 – Rural Commercial Activities.**
  Rural Commercial is defined in the WDP 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 bloodstock sales operation falls under this definition and requires resource consent accordingly.

- A **Restricted Discretionary Activity** consent is required pursuant to **Rule GRUZ-S9 – Building Coverage –** the bloodstock precinct will result in a total site coverage of 25.7% (55,200m^2), where 5,000m^2 is the maximum.

- A **Restricted Discretionary Activity** consent is required pursuant to **GRUZ-S12 – Building Setbacks – All Boundaries.** A blanket land use consent for reduced 15m setbacks from all boundaries is proposed to be applied for the buildings constructed as part of the bloodstock precinct.

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 1,000m^3 over an area of 2,000m^2 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 exceed a maximum volume of 500m^3 in a single 12-month period.

Associated Permitted Activities – Bloodstock Precinct

The Operative in Part Waikato District Plan allows for the following permitted activities which form part of the precinct application:

District Wide Matters

LIGHT-R2 – Glare and Artificial Light Spill - The precinct will involve the provision of external lighting around the buildings that will comply with the above standard for lighting of the precinct. Lighting activities that comply with all the relevant permitted activity standards is provided for as a permitted activity pursuant to the above rule. The above standard is captured in the proposed consent conditions in **Appendix TD** to ensure compliance will be achieved.

- **Noise-R8 – Noise – General -** The precinct involves both activities that will emit operational noise at all adjacent properties that will comply with the relevant permitted activity standards. The acoustic report attached as **Appendix TD** demonstrates how the relevant permitted activity standards will be complied with. The proposed conditions of consent in **Appendix TD** include relevant noise conditions to ensure compliance will be achieved.

General Rural Zone

- **GRUZ-R23 – Construction, Demolition and Alteration of a Building or Structure –** The existing buildings within the overall site will be demolished as part of the redevelopment of the site. This is allowed for as a Permitted Activity.

- **GRUZ -S3 – Building Height – General –** The General Rural Zone allows for buildings up to 15m in height, with buildings located within 50m of the site boundary being required to have a maximum height of 10m. The buildings proposed as part of the precinct comply with this standard. The proposed conditions of consent in **Appendix TD** include conditions to ensure compliance will be achieved.

- **GRUZ – S8 – Height in Relation to Boundary –** The General Rural Zone requires buildings to not protrude through a building envelope consisting of a 45 degree angle commencing at 2.5m at the site boundary. The buildings proposed as part of the precinct are expected to comply with this standard. The proposed conditions of consent in **Appendix TD** include conditions to ensure compliance will be achieved.

Waikato Regional Plan

The following regional council consents are required for the bloodstock precinct

Chapter 3 – Water module

- **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 within the racing precinct.

- **Wastewater Discharge** – Consent is required pursuant to **Rule 3.5.7.7** for wastewater discharge to land as a **Discretionary Activity**.

Commercial Precinct

The following resource consents are required in relation to the Commercial Precinct under the WDP.

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 falls 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 commercial precinct, which is proposed to contain small scale commercial uses such as a bar /café and small-scale retail.

  The proposed uses are still to be finalised at this stage, so consent is being applied for to accommodate commercial development.

- A **Restricted Discretionary Activity** consent is required pursuant to **GRUZ-S9 – Building Coverage** A blanket land use consent for 100% building coverage is proposed for Lots 201 – 206 and 301-302.

- A **Restricted Discretionary Activity** consent is required pursuant to **GRUZ-S12 – Building Setbacks – All Boundaries.** A blanket land use consent for reduced 0m setbacks from all boundaries is proposed to be applied for the buildings constructed as part of the commercial precinct within Lots 201 – 206 and 301-302.

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 1,000m^3 over an area of 2,000m^2 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 exceed a maximum volume of 500m^3 in a single 12-month period.

Subdivision

- A **Prohibited Activity** subdivision is proposed pursuant **SUB-R40 Prohibited Subdivision** to subdivide the commercial precinct into individual Lots as the Title subject to the proposal will have a Title issue date post December 1997 and contain high-class soil with more than one additional Lot being created.

Associated Permitted Activities – Commercial Precinct

The Operative in Part Waikato District Plan allows for the following permitted activities which form part of the precinct application:

District Wide Matters

LIGHT-R2 – Glare and Artificial Light Spill - The precinct will involve the provision of external lighting around the buildings that will comply with the above standard for lighting of the precinct. Lighting activities that comply with all the relevant permitted activity standards is provided for as a permitted activity pursuant to the above rule. The above standard is captured in the proposed consent conditions in **Appendix TE** to ensure compliance will be achieved.

- **Noise-R8 – Noise – General -** The precinct involves both activities that will emit operational noise at all adjacent properties that will comply with the relevant permitted activity standards. The acoustic report attached as **Appendix P** demonstrates how the relevant permitted activity standards will be complied with. The proposed conditions of consent in **Appendix TE** include relevant noise conditions to ensure compliance will be achieved.

General Rural Zone

- **GRUZ-R23 – Construction, Demolition and Alteration of a Building or Structure –** The existing buildings within the overall site will be demolished as part of the redevelopment of the site. This is allowed for as a Permitted Activity.

- **GRUZ -S3 – Building Height – General –** The General Rural Zone allows for buildings up to 15m in height, with buildings located within 50m of the site boundary being required to have a maximum height of 10m. The buildings proposed as part of the precinct comply with this standard. The proposed conditions of consent in **Appendix TE** include conditions to ensure compliance will be achieved.

- **GRUZ – S8 – Height in Relation to Boundary –** The General Rural Zone requires buildings to not protrude through a building envelope consisting of a 45 degree angle commencing at 2.5m at the site boundary. The buildings proposed as part of the precinct are expected to comply with this standard. The proposed conditions of consent in **Appendix TE** include conditions to ensure compliance will be achieved.

Waikato Regional Plan

The following regional council consents are required for the commercial precinct

Chapter 3 – Water module

- **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 within the racing precinct.

- **Wastewater Discharge** – Consent is required pursuant to **Rule 3.5.7.7** for wastewater discharge to land as a **Discretionary Activity**.

National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS)

A Discretionary Activity consent is required pursuant to the NESCS as HAIL activities have been identified on-site but the risk to human health has not been quantified.

This is discussed below.

Other National Environmental Standards

The proposal does not require resource consents under any of the other National Environmental Standards, including:

- National Environmental Standards for Air Quality 2004.
- National Environmental Standards for Commercial Forestry.
- National Environmental Standards for Telecommunication Facilities.
- National Environmental Standards for Electricity Transmission Activities.
- National Environmental Standards for Sources of Drinking Water.
- National Environmental Standards for Marine Aquaculture.
- National Environmental Standard for Storing Tyres Outdoors.
- National Environmental Standards for Detached Minor Residential Units.
- National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat.
- National Environmental Standards for Papakāinga.

10. CONSISTENCY WITH THE PURPOSE OF THE FTAA

Explanation of how the project is consistent with the purpose of the FTAA (s43(1)(b)(i))

The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Section 22(2)(a) provides the criteria for significant regional or national benefits. The following are considered relevant to the proposal:

- *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)*
- *Will deliver significant economic benefits*

The proposal is a referred project under the FTAA. This means the ministers referral decision for the Hub identified it as having significant regional or national benefits.

As identified in the referral application, the proposal is a development project that will have significant regional and national benefits for the following reasons:

- supports a significant regional industry
- provides significant economic benefits
- increases housing supply within the Waikato Region, including through land currently located within existing urban limits.

Further discussion regarding the benefits of the Hub is provided in Section 11 below.

11. INFORMATION REQUIRED FOR AN SUBSTANTIVE APPLICATION (S43)

Ineligible Activities s43((1)(c))

In accordance with Section 43 of the FTAA, the application does not seek approval for an ineligible activity, as the Hub:

- Is not occurring on identified Maaori land.
- Does not occur in a customary marine title area.
- Does not occur in a protected customary rights area;
- Does not occur on Maaori customary land or land set apart as a Maaori reservation as defined in section 4 of Te Ture Whenua Māori Act 1993.
- The Hub is not an aquaculture activity;
- The Hub is not an activity that would require an access arrangement under section 61 or 61B of the Crown Minerals Act;
- The Hub will occur on land and, therefore, does not involve any activity that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the Resource Management Act 1991 which relate to activities within the coastal marine area;
- The Hub does not occur on land that is listed in Schedule 4;
- Does not occur on a national reserve or other reserve land held under the Reserves Act 1977;
- Is not a prohibited activity under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or regulations made under that Act; and
- Is not a prohibited activity under section 15B or section 15C of the RMA as the Hub does not involve discharges from ships or offshore installations or involve radioactive waste or matter.

Specified Matters for the Accepted Referral Application (s43(e)(i))

As outlined in the Notice of Decision on application for referral of the Hub under the FTAA 2024 (**Attached as Appendix V)** the Minister has not specified under section 27(3)(b)(ii) that any specific information must be submitted with the substantive application lodged for the Hub.

The minister has however, specified that pursuant to section 27(3)(b)(iii), a panel must invite comments from the following groups, in addition to those specified in section 53:

a. the Chief Executive of Waikato Regional Airport Limited
b. Hamilton City Council
c. Waipaa District Council
d. the Minister for Seniors.

In light of this, the applicant has approached the above groups for comment on the application. Summaries of these comments are outlined below under the relevant subheadings.

These letters are attached to the consultation summary as **Appendix CB.**

Chief Executive of Waikato Regional Airport

Waikato Regional Airport maintain their referral position of being generally supportive of the development of the Hub, subject to the Hub not impacting airport operations. The WRAL advised that they will provide comments on the Hub once invited by the Panel as part of the processing of the substantive application.

It is noted that the site is not located within any District Plan airport overlays relating to noise but is located within the airport obstacle limitation surface. Despite this, the Hub does not propose any structures that would breach the obstacle limitation surface.

Hamilton City Council

A letter has been provided from Hamilton City Council (HCC) acknowledging the benefits of the Hub proposal, notably:

- *Racing has historically been a major part of the Waikato region's identity and keeping the industry viable contributes to protecting the region's culture and heritage.*
- *The proposal centralises and helps sustain the racing industry in the Waikato.*
- *The proposal enables more efficient provision of racing services where effects can be better managed such as traffic from racing days.*
- *The proposal allows for the potential conversion of existing racecourses to urban land uses, freeing up large areas of land well located within existing urban areas.*
- *HCC supports the opportunity to provide comments on the proposal and is supportive of its regional intent and recognises the potential benefits it may deliver for the Waikato.*

This is subject to consideration of potential cross boundary effects as a result of the development as outlined in the referral application feedback.

Waipaa District Council

A letter has been provided from Waipaa District Council (Wai DC) acknowledging the benefits of the Hub proposal, notably:

- *For Waipaa, the benefits extend well beyond racing. The project has the potential to create jobs, attract investment and reinforce our reputation as the Home of Champions, building on the skills, expertise and equine businesses that have made our district internationally recognised. It will help create opportunities for the next generation of trainers, riders, breeders, stable staff and other skilled workers to build their careers in our region.*
- *As a growing district, we want growth to deliver jobs, opportunities and stronger communities. Projects that support skilled employment, business development, and regional prosperity are critical to Waipaa's future.*
- *The Waikato Thoroughbred Racing Greenfield Racing Hub is a project of regional and national significance with the potential to deliver substantial economic benefits for Waipaa and the wider Waikato for decades to come. I therefore support its progression through the Fast-track Approvals process and commend it to the Panel for consideration.*

Minister for Seniors

Minister Casey Costello advised that she would provide comments on the Hub once invited by the Panel.

Requirements of Approvals Sought (s43(1)(ii))

All information requirements related to the necessary approvals that would be required to undertake the Hub, and for which approval is sought under the FTAA, are outlined in section 9 of this report.

Application under Section 39 for a Determination under Section 23 or 24 (s43(1)(f) and (g))

No application has been made for a determination under section 23 or 24 of the FTAA.

Whether the Application is a Priority Project (s43(1)(h) and (i))

This substantive application is not for a priority project as outlined above. Clause (1)(i) does not apply to the Hub.

Application must be made by the Deadline Specified in the Notice under Section 28(3)(d)

This substantive application has been lodged within the deadline specified in the notice of decision.

Compliance and Enforcement (s43(2))

S43(2) of the FTAA requires a substantive application to provide a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant under a specified Act.

Waikato Thoroughbred Racing Incorporated has advised that they have not been subject to any compliance or enforcement actions.

12. PROJECT CONSULTATION

Section 29 of the FTAA requires that the applicant consult with the persons and groups referred to in s11 of the FTAA prior to lodging the referral application.

Section 11 requires the applicant to consult with:

(b) relevant local authorities; and

(c) any relevant iwi authorities, hapuu, and Treaty settlement entities, including—

(xi) iwi authorities and groups that represent hapuu that are parties to relevant Mana Whakahono ā Rohe or joint management agreements; and

(xii) the tangata whenua of any area within the project area that is a taiaapure-local fishery, a maataitai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996; and

(d) any relevant applicant groups with applications for customary marine title under the Marine and Coastal Area (Takutai Moana Act) 2011; and

(e) ngaa hapuu o Ngaati Porou, if the Hub area is within or adjacent to, or the project would directly affect, ngaa rohe moana o ngaa hapuu o Ngaati Porou; and

(f) the relevant administering agencies; and

(g) if the proposed approvals for the project are to include an approval described in section 42(4)(f) (land exchange), the holder of an interest in the land that is to be exchanged by the Crown

In the case of the referral application, (xii), (d), (e) and (f) were not relevant to the Hub.

Consultation was undertaken with the relevant local authorities, mana whenua and the relevant administering agencies, which is detailed in the consultation summary attached as **Appendix D.**

Territorial Authorities

The applicant and project team has had several meetings each with Waikato District Council, Waipaa District Council and Hamilton City Council. Representatives from all three Councils were also part of the wider Fast-track Action Team (FTAT).

The purpose of these meetings was to introduce the Hub and seek feedback on the proposal, while also discussing key issues such as traffic.

An overview of the consultation undertaken with FTAT and the three individual Councils is included in the consultation summary.

The Applicant is committed to working with Waikato District Council constructively and will continue to meet with its representatives to discuss the lodged application and recommended conditions of consent.

Mana Whenua

In accordance with s11(b) of the FTAA, the applicant and project team has engaged with the relevant hapuu who are mana whenua of the site.

The Section 18 report prepared for the referral application outlined that the iwi authorities relevant to the Hub area are as follows:

- Ngaati Hauaa Iwi Trust, representing Ngaati Hauaa.
- Raukawa Settlement Trust, representing Ngaati Raukawa.
- Te Whakakitenga o Waikato, representing Waikato-Tainui.

Is it noted that as part of the Section 18 report, Raukawa considered that no further engagement was required with them, subject to engagement continuing with mana whenua.

In addition to the above groups, Ngaai Korokii Kahukura have also been consulted with as part of the referral and substantive process.

The hapuu have been consulted and engaged throughout the pre-referral process and substantive application process.

The purpose of the consultation has been to establish an ongoing relationship with the hapū, introduce the Hub and understand cultural values on the site.

Ongoing consultation has occurred with the hapuu as documented in the consultation summary included as **Appendix D**

The Applicant is committed to working with the iwi authorities constructively and will continue to meet with its representatives to discuss the lodged application and recommended conditions.

In addition, the hapuu have provided cultural values assessments that are supportive of the Hub, subject to outlining a commitment to establishing a partnership between the applicant and mana whenua.

This commitment has been further strengthened through the preparation of a memorandum of understanding between Ngaati Haua, Ngaati Korokii Kahukura and the applicant, which is attached as **Appendix W.**

Administering Agencies

The applicant undertook consultation with the relevant Administering Agencies, which in this case includes the Department of Conservation, Environmental Protection Authority, Heritage New Zealand, New Zealand Transport Agency and the Ministry for the Environment.

Consultation has occurred with these agencies from mid-2025 up until lodgement of the substantive application.

The administering agencies have all advised they have no fundamental issues with the application, subject to proper mitigation measures being imposed.

Details of the consultation undertaken with the administering agencies can be found in the consultation summary document.

The Applicant is committed to continuing to work with the administering agencies, in particular the Department of Conservation once the application is lodged.

An attempt was made to contact the Minister for Seniors for comment on the substantive application. Minister Costello responded stating that comment would be provided as part of the response to the invite to comment extended by the panel during processing of the substantive application.

Potentially Affected Landowners

Under clause 6(1)(e) of Schedule 5 of the FTAA, persons who may be affected by the proposal must be identified and any response to the views of any such person must be provided.

Potentially affected landowners have been identified and consulted in the preparation of this application.

Significant ongoing consultation has occurred, including wider community open days and the establishment of Neighbour Liaison Group (NLG) to discuss the proposal and receive feedback from neighbours directly adjoining the site. This group consists of representatives from Pencarrow, Hooker and Duncan Roads, which all border the site. A summary of NLG feedback is attached to the application as **Appendix B**

Feedback from potentially affected landowners (and the wider community) has been considered and resulted in changes to the overall masterplan and application.

Details of this consultation and how feedback has been incorporated into the design of the master plan is attached as **Appendix CA**

No other potentially affected landowners outside of those directly adjoining the site have been identified. This includes landowners located on the opposite sides of Pencarrow, Hooker and Duncan Roads.

As required by clause 5(1)(d) of Schedule 5 of the FTAA, the names and addresses of adjacent landowners and occupiers is included as **Appendix M.**

It is noted that responses were only received from two landowners out of a total of 71 letters dropped.

13. PROJECT BENEFITS, ADVERSE IMPACTS AND MITIGATION MEASURES

This section of the application is provided in accordance with clause (5)(4) of Schedule 5 of the FTAA. This requires the application to include an assessment of the activity's effects on the environment that includes the information required by clause 6 and clause 7 of the FTAA.

This clause requires assessment of:

- The known adverse effects of the Hub on the environment as required by s43(2) and 13(4)(h) of the FTAA; and
- A description of whether and how the Hub would be affected by climate change and natural hazards as required by s43(2) and 13(4)(V) of the FTAA.

The persons identified in **Appendix M** are considered to be the same people who may be affected by the activity (with reference to clause 6(1)(e) of schedule 5) and are considered in the assessment of effects.

The actual and potential effects of the Project are assessed below and in the supporting technical reports submitted with this application.

The following effects on the environment (including on the matters set out at clause 7 of Schedule 5) are considered relevant to the project:

- Positive Effects and Regional Benefits
- Landscape / Visual Effects
- Urban Design Effects
- Earthworks Effects
- Contamination

- Acid Sulfate Soil Effects
- Transportation Effects
- Infrastructure Effects
- Ecology Effects
- Archaeology Effects
- Cultural Effects
- Construction Effects
- Lighting Effects
- Acoustic Effects
- Natural Hazards
- Highly productive land effects

These matters are set out and discussed in the below sections.

Project Regional Benefits and Positive Effects

As outlined in the Economic Impact Assessment (EIA), 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, farriers, 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 of regional significance 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.

Economic Benefits

The Hub is estimated to add between $147.1m at an 8% NPV, or $173.7m under an earlier-start scenario to the Waikato economy over the Hub development timeframe, along with direct expenditure of $457m over the 8-year development period and 1,306 FTE years over the 8-year development period. Therefore, the project is a development project of significant regional benefit across all precincts.

This unique, world class Hub will bring the expertise the local racing fraternity together in a centralised location and has the potential to bring international investment by becoming a 'destination' for horse racing in New Zealand. In addition, the development offers the opportunity for ancillary benefits for housing, commercial activity and community focus.

The Hub is anticipated to boost the economic capacity in the Waikato and contribute to the regional economy 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 racing sites once no-longer required.
- the senior living precinct will provide for additional capacity within a market where a material increase in senior accommodation and care provision demand is expected over the medium and long term. It will positively contribute to accommodating future demand, increase the range and choice of senior living options available to the growing senior population, and reduce the risk of future supply constraints or spatial disparities.
- the residential lifestyle precinct broadens housing choice by providing additional product aligned with demonstrated market preferences for this form of development. As part of the wider greenfield racecourse development, the residential lifestyle precinct is planned alongside the Hub's other land uses, infrastructure, access and amenity outcomes. This provides an opportunity to accommodate lifestyle demand within a coordinated development framework and to integrate the scale and form of the precinct with the efficient development of the wider site.
- the establishment of a modern purpose-built bloodstock sales facility within the Waikato Region can improve overall market efficiency by providing greater flexibility in the timing and format of sales. This precinct could accommodate overflow demand, support specialised or secondary sales segments, and extend the sales calendar, thereby reducing peak congestion at the current site in Karaka.

As discussed in this application and in the (EIA) prepared by Property Economics (attached as **Appendix B**), the quantified economic benefits of this proposal include, but are not limited to the following listed in **Table 8** below:

Regional Benefits	**Economic Benefit**
Total direct expenditure over an 8-year development period (excl. land)	**$457.0m**
Total GDP NPV at 8% over an 8-year development period	**$147.1m**

Total GDP NPV at 2% over an 8-year development period	**$243.2m**
Total full time employment years during the peak development year	**464 FTE years**
Total FTE years over the 8-year development period	**1,306 FTE years**
Total direct employment over the development period	**496 FTE years**
Total indirect and induced employment over development period	**810 FTE years**

Table 8: Quantified Economic Benefits of the Proposal.

Under a scenario where development starts two years earlier in 2030 and spans 8 years, this would lead to an estimated increase in total value added (GDP) of around $173.7m for the Waikato region over the life of the 8-year development timeframe.

Applying a 2% discount rate, the Hub is estimated to generate approximately $253.3m in total business activity across the Waikato region over the full development timeframe.

In addition to the quantified economic benefits outlined above, the following qualitative economic benefits are created as a result of the proposed Hub. These benefits relate to the wider regional market and community and include:

- strengthening of Waikato region's nationally significant racing industry
- long-term industry sustainability and productivity gains
- regional employment and income generation
- increased event-based expenditure and visitor economy benefits
- enhanced local and regional profile
- improved bloodstock sales market efficiency
- increased competition in rural lifestyle housing options
- more productive use of existing racecourse land resources (indirect).

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.

The existing and anticipated supply of retirement living is estimated to meet demand across the wider Future

Proof area until at least 2028. This, however, does not reflect the spatial distribution of demand, with an existing shortfall identified in Waikato district, where unmet demand is estimated at approximately 450-970 units and care beds by 2033.

Therefore, the precinct would provide additional capacity within a market where a material increase in senior accommodation and care provision demand is expected over the medium and long term. It would positively contribute to accommodating future demand, increase the range and choice of senior living options available to the growing senior population, and reduce the risk of future supply constraints or spatial disparities.

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.

Other Project Benefits

Other positive effects of the Project contributing to the overall significant regional benefits of the project include:

- 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
- 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.

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

Landscape and Visual Effects

The site is currently used for productive rural use, with the surrounding land uses consisting of predominately rural residential activity. While it is acknowledged that the construction of the Hub represents a significant change to the existing environment, substantial landscaping is proposed along the precinct's boundary with Pencarrow, Hooker and Duncan Roads, which, once mature, will provide visual screening of the built form of the precinct from adjoining properties.

Furthermore, the numerous buildings proposed as part of the precinct all comply with the maximum permitted building height of 15m for buildings that are located further than 50m away from the site boundary, ensuring that the height of the built form is consistent with District Plan expectations for the Rural Zone.

While the lighting masts proposed do exceed the maximum height for buildings, it is considered that these do not present any dominance effects on the receiving environment due to these structures not presenting as buildings in the traditional sense.

In regard to the commercial precinct, the buildings proposed as part of the precinct are proposed to be located over 50m from the external boundaries of the precinct in accordance with District Plan requirements and therefore maintain appropriate separation from neighbouring sites.

While a reduced setback is proposed from the internal eastern and southern precinct boundaries, this reduced setback is internal to the overall Hub development, with the proposed buildings being over 50m from the nearest external boundary of the Hub adjoining Pencarrow Road.

The fact that the commercial precinct is recessed into the overall Hub assists in assimilating the precinct into the site and avoids the precinct dominating neighbouring properties.

Sufficient separation and greenspace are proposed to be included within the precinct to break up the built form of the development.

In regard to the senior living precinct, the buildings proposed as part of the precinct are proposed to be constructed in accordance with District Plan height requirements and therefore will not result in the buildings dominating the landscape or privacy issues on neighbouring properties.

The precinct is proposed to exceed the maximum allowable site coverage due to the number of buildings proposed. However, despite this exceedance, sufficient separation between buildings and greenspace is proposed to be included within the precinct to break up the built form.

While a reduced 10m setback is proposed from all boundaries, the northern and eastern reduced setbacks are internal to the overall Hub development. In regard to the Hooker Road and western precinct boundary, the required 10m setback, combined with the substantial landscaping proposed along the precinct's external boundaries will mitigate the adverse effects of the precinct. Once mature, the landscaping will provide visual screening of the built form

In regard to the bloodstock precinct, this is considered to be rural commercial activity which has a direct relationship to the rural environment. Due to the land area required to establish the buildings within the development, has a direct need to be located in the rural zone.

The buildings proposed as part of the precinct are proposed to be located at least 25m from the external boundaries of the precinct adjoining neighbouring sites not within the Hub in accordance with District Plan requirements and therefore maintain appropriate separation from neighbouring sites. While a reduced 10m setback is proposed from the internal eastern and southern precinct boundaries, this reduced setback is internal to the overall Hub development.

The precinct is proposed to exceed the maximum allowable site coverage due to the number of buildings required to undertake the bloodstock operation. However, despite this exceedance, sufficient separation and greenspace is proposed to be included within the precinct to break up the built form.

In regard to additional mitigation, substantial landscaping is proposed along the precinct's external boundaries, which, once mature, will provide visual screening of the built form of the precinct from adjoining properties.

It is considered that the potential adverse effects of the scale of the precinct can be mitigated to an acceptable level through the imposition of significant boundary treatments. it is considered that as the visual effects of the precinct are temporary in nature and will reduce year-on-year as planting grows in height and width.

This is supported by the assessment of Landscape effects prepared by SLR (attached as **Appendix X**).

Given the amendments to the layout of the overall Hub made for the substantive application, Arcadia have provided an Assessment of Landscape Effects Memorandum (**Appendix XA**), addressing landscape effects relative to the latest masterplan.

The Substantive Application can be said to have a minor increase in landscape effects than the Referral Application. Increased landscape effects are due to the consolidation of built form in the northern and western quarters of the site and the change from bloodstock to senior living in the southwest corner.

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 landscape character that will be mitigated to be less than minor.

Based on the above assessments, it is considered that landscape and visual effects will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Urban Design Effects

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

"On the basis of this assessment, the WTR Greenfields Racecourse substantive proposal is assessed as having overall positive urban design effects, as demonstrating a design rationale and level of resolution appropriate for approval under the Fast Track Approvals Act, and as providing a credible and well-structured platform for the delivery of a world-class, community-oriented and culturally responsive equine precinct that will serve the Waikato region for generations to come"

Based on the above assessments, it is considered that urban design effects will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Earthworks Effects

The proposed area and volume of earthworks will increase the potential for the generation and discharge of elevated levels of sediment off-site.

This can result in discharge into adjacent properties and waterbodies if not properly managed, which can adversely affect water quality.

Earthworks for the precinct 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.

As summarised in the earthworks section above, proposed erosion and sediment control measures are detailed in the draft ESCP attached as **Appendix QB.**

These measures will ensure that sediment runoff is contained within the site works area, without discharging off-site and includes contingency measures in the case of heavy rainfall or dewatering.

In addition, 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 the implementation and maintenance of a detailed ESCP, which will ensure that any adverse earthworks effects can be sufficiently mitigated to ensure no off-site adverse effects.

Based on the above assessments, it is considered that earthworks effects will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Dust Effects

During construction, it is anticipated that there will be dust potentially generated by the earthworks and land disturbance which can generate effects on neighbouring properties and transport networks.

Effects from dust able to be mitigated and managed via the draft ESCP (**Appendix QB**), which outlines dust sources, generation factors and monitoring measures.

Implementation and compliance with the ESCP during construction will ensure that any adverse environmental effects relating to dust will be no more than minor.

In addition, boundary landscape treatment in accordance with the provided landscaping plans is proposed to be planted at the earliest opportunity to assist with dust mitigation during the construction phase.

Based on the above assessments, it is considered that dust effects will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Contamination Effects

Previous investigations undertaken on the site as part of the referral application identified activities on the Hazardous Activities and Industries List (HAIL) which are ongoing or have occurred at the Site. These activities are consistent with the current use of the Site as a farm.

A preliminary site investigation (PSI) was submitted to support the referral application, with a contaminated site management plan (CSMP) proposed to be drafted as part of the substantive application.

As activities regulated under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (2011) (NES CS) are proposed for the Site, activities on the HAIL have been identified at the Site, and areas of the Site have been identified as "Pieces of Land", a resource consent under the NES CS will be required.

Feedback from Waikato Regional Council (WRC) on the referral application advised that they agreed with the conclusions of the investigation and supports the preparation of a contaminated site management plan, including a targeted investigation of identified areas to inform management and remedial measures to manage risks to human and environmental health as part of a substantive application.

To support the substantive application, a draft CSMP has been prepared **(Appendix JA)** to demonstrate that risks to human and environmental health can be successfully mitigated. This would include outlining how investigations would be undertaken to quantify the potential risk, as well as management measures for soils at the Site.

This management plan has been prepared to demonstrate effects from the disturbance of potentially contaminated soils and groundwater at a Site can be managed through the implementation of high-level controls.

This plan will be refined and updated as design details are finalised, including the construction sequencing earthworks details. Conditions of Consent will require the draft CSMP to be finalised and certified by Council prior to works being undertaken.

As such, if the recommendation of the CSMP are implemented and followed during construction works, it is considered that contamination effects will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Acid Sulfate Soil Effects

BCD Group prepared a desktop acid sulfate soil assessment as part of the referral application for the Hub.

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

While the presence of ASS 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 ASS underlying the Site.

The desktop assessment has identified that the Site is regarded as high risk by WRC for the presence of acid sulfate soils (ASS). The adverse effect related to ASS is soil becoming strongly acidic if exposed to oxygen during earthworks. In response to this, BCD have prepared a draft acid sulfate soil management plan (ASSMP) which has been attached to the application as **Appendix JB.**

This management plan is intended to demonstrate that the potential impacts from acid sulfates at the Site can be managed through the implementation of high-level controls and investigation. This plan will be updated as design details are confirmed and investigations at the Site are undertaken.

The ASSMP outlines further sampling protocols to develop a detailed understanding of the extent of potential ASS at the site, including protocols for surface and groundwater assessments if ASS is identified as a result of further sampling and analysis.

The ASSMP also outlines handling protocols if ASS are discovered along with requiring validation sampling to verify the ASS risk has been neutralised.

While the ASSMP is a draft, a finalised ASSMP is proposed to be submitted to Waikato Regional Council for approval at least 20 working days prior to works being undertaken on the site. The finalised ASSMP will incorporate the results of further sampling undertaken as per section 6 of the draft ASSMP and is included as a condition of consent. This is referenced in the following draft conditions provided within **Appendix T;**

- Condition 67 of **Appendix TB;**
- Condition 68 of **Appendix TC;**
- Condition 66 of **Appendix TD;**
- Condition 52 of **Appendix TE.**

As such, if the recommendation of the ASSMP are implemented and followed during construction works, it is considered that ASS effects will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Transportation Effects

The transportation effects of the precinct relate to construction traffic, and effects on the wider transport network as a result of increased vehicle movements to and from the site. These effects are discussed in more detail in the Integrated Transport Assessment (ITA) attached as **Appendix F,** Internal Road Design Memo **(Appendix FA)** and CTMP and ETMP.

The imposition of a CTMP, ETMP and the proposed roading upgrades will mitigate the adverse environmental traffic effects of the precinct to be less than minor.

Construction Traffic

Key construction traffic effects are anticipated to fall into the following categories:

- Bulk earthworks and site establishment haulage movements.
- Delivery to site of construction materials, plant and equipment.
- Interaction between construction traffic and existing road users.
- Workforce travel and parking management.
- Activities that may require temporary traffic management measures, lane restrictions, temporary speed limits, and changes to normal road operating conditions.
- Protection of the local road network.

In terms of the above, it is noted that earthworks traffic will mostly be contained within the subject site and, therefore, will largely be internal to the site.

Vehicle movements will be limited to the transportation of machinery and equipment to and from the site, the importation of construction materials, and vehicles associated with site staff, inspectors, and consultants.

A draft high-level CTMP has been provided as **Appendix QD**, demonstrating that construction traffic effects can be adequately mitigated provide the requirements of the CTMP are imposed and followed.

Wider Transport Network Effects

The proposed the precinct has the potential to result in adverse road safety and efficiently effects as a result of the increase in traffic generation and flow to the existing roading network.

The proposed roading layout and increase in traffic flow has been assessed in the Integrated Transport Assessment (ITA) **(Appendix F)** for the wider development, as well as specifically to the precinct.

Overall, the precinct can be established with transport effects that are appropriately mitigated through specific access design and appropriate on-site parking.

The roading network within the precinct will be privately owned, and be a low-speed environment with a posted speed limit of 40km/hr.

In regard to traffic related to events held on-site, as detailed in the draft ETMP attached to the application as **Appendix QC,** for events where over 1,000 attendees are proposed, traffic management measures are proposed to ensure that traffic safety is maintained during larger events. Therefore, it is considered that traffic effects associated with events on-site can be successfully mitigated provided the appropriate measures within the ETMP are imposed.

Overall, the proposal is considered to provide a high level of safety, access, permeability and efficiency for all traffic generated, and will result in less than minor adverse effects on the wider transport network. Based on the above assessments, it is considered that transportation effects will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Infrastructure Effects

As outlined in the provided Civil and Hydrogeology reports, and discussed below, the precinct can be adequately serviced via on-site, self-contained systems and methods for wastewater, stormwater, and water supply.

Through proper engineering design and plan approval through conditions of consent, adverse effects relating to infrastructure will be mitigated to less than minor.

These individual services are discussed in further detail in the below sections.

Wastewater

As per the provided civil design report (**Appendix I**), wastewater drainage can be provided for the various development precincts though a series of networks. A mixture of specialist and typical wastewater treatment facilities will be provided to ensure that the wastewater generated from the development will be appropriately treated prior to discharging to land.

A mixture of specialist infrastructure and typical OSET design systems will ensure the development can effectively manage the large fluctuations of expected wastewater flows during large events on-site and will ensure that any adverse effects relating to wastewater disposal will be mitigated and will be acceptable.

Water Supply and Groundwater Take

Groundwater investigations have been undertaken by WGA to consider the potential effects on groundwater as detailed in the assessment in **Appendix GA.**

Based on the testing undertaken, potable water supply for the entire Hub development (500m^3) can be provided with no drawdown effects on neighbouring bores due to the aquitards screening shallower bores from any drawdown.

Therefore, in regard to the actual required water supply for the Hub, potable water can be provided with no adverse effects or mitigation required.

For track irrigation, which requires a higher ground water take of approximately 1,000m^3 per day, the groundwater resource appears capable of supplying 1,000 m^3 per day, while drawdown impacts are generally manageable and largely confined to the deeper aquifer being pumped. Six bores have been identified that could potentially be affected by drawdown.

The drawdown assessment indicates that effects can be lessened through separation of potable and irrigation pumping from separate bores, subject to further investigation.

In regard to water supply for irrigation, which is more of an operational requirement, to ensure that adverse drawdown effects are less than minor, the following further investigation is required

- *A stepped-rate test followed by a three-day constant-rate*
- *Pumping test of the production bore, with suitable observation and recovery monitoring, should then be used to refine aquifer parameters, confirm sustainable yield and reassess effects under the potable, irrigation and combined scenarios.*

Subject to those investigations confirming sustainable yield and acceptable bore-specific effects, the proposed groundwater supply for irrigation is feasible. These investigations will be required to be undertaken as conditions of consent.

As summarised above, servicing the development for potable water in accordance with RITS requirements will result in no adverse effects on neighbouring bores.

Subject to further investigation, supply of 1,000m^3 per day is also feasible, however this will require further assessment as conditions of consent.

Stormwater Management

Stormwater drainage can be provided for the development through bio vegetated swales and stormwater retention ponds. Re-use of stormwater for irrigation purposes is proposed where possible. Overland flow paths will be managed through the development, and it will reduce any potential flooding risk of the proposed infrastructure associated with this development.

As part of the cultural values assessments provided, a key concern of mana whenua is the effect of the development on the health and wellbeing of the receiving catchment in regard to water.

The swale network and the proposed stormwater retention ponds will ensure that both the upstream and downstream environments will not be adversely affected, in both flow and water quality.

An overarching stormwater strategy has been developed, and this sets out the high-level, best practice approach for stormwater management within the catchment. This is detailed in the Stormwater Management Plan (SMP), which is attached to the application as **Appendix QI.**

Overall Infrastructure Conclusion

Overall, the precinct can be appropriately managed via on-site measures subject to detailed engineering design and further investigation on relation to water supply.

Based on the above assessments, it is considered that infrastructure effects will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Ecology Effects

An Ecological Impact Assessment (EIA) has been prepared by Awa Ecology (attached as **Appendix H**), 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 EIA 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:

Effects on Terrestrial Vegetation

As discussed above, the remnant Kahikatea stand has high ecological value. 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.

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 ecological 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 of these trees 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.

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 the prescribed Ecological Management Plan (EMP) (**Appendix HA)** will ensure that any potential adverse effects in relation to terrestrial vegetation can be sufficiently mitigated.

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.

Removal of vegetation has the potential to adversely affect terrestrial fauna, through damage to habitats and the loss of individuals killed during activities associated with construction.

To reduce any adverse effect on lizards, pre-clearance lizard surveys/searches may be required if areas providing suitable habitat, including fallen logs and woody debris and low-growing shrubs are proposed to be cleared. A site-specific Lizard Management Plan (LMP) has been prepared and is attached to this application as **Appendix HC.**

Provided any adverse effects of the development on lizards and their habitats are considered and avoided, remedied or mitigated at the time of works, the overall effect on lizards is low.

All works across the site should be carried out in accordance with the provided EMP to ensure any adverse effects (such as those above) are effectively mitigated.

Restoring and managing the kahikatea stand (as outlined in Appendix 7 and the EMP) will provide positive ecological benefits for native wildlife such as birds, bats, and lizards that use the area and would also be considered appropriate mitigation.

To support the above, an EMP, Fish Management Plan (FMP), Lizard Management Plan (LMP) and separate Bat Management Plan (BMP) have been prepared.

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.

Pekapeka-tou-roa (Long tailed bat)

Bat Monitoring was undertaken within the site at nine locations over a 20-night period. The bioacoustics survey undertaken indicates bat activity at the site ranged from low in areas of pastoral farmland with scattered trees to relatively high within the kahikatea stand.

It was determined that the Kahikatea stand was a commuting passage and occasional feeding area for bats. Roosting activity was not identified within this stand, however the presence of a nearby roost cannot be ruled out.

The development of the land including the establishment of a horse racecourse, training facility, harness racing and associated infrastructure may cause several adverse effects on long-tailed bat habitats, including habitat loss, habitat fragmentation, and increases in noise and lighting.

Following the amendments to the precinct site layout, an updated longtail bat effects assessment was undertaken.

The following statement summarises this updated assessment.

"The proposal will convert and intensify a large, predominantly pastoral landscape through racecourses, training tracks, built facilities, parking, roads, residential and commercial activities. Relevant effects include habitat loss, reduced habitat permeability, severance and fragmentation, disturbance of commuting and foraging behaviour, potential roost-tree effects, headlight and operational spill, urban-edge effects and increased predator pressure"

In regard to lighting, there is a widely accepted long-tailed bat-edge criterion of one lux at the edge of retained kahikatea stand. As per the provided lighting design, the proposed level of illumination at the edge of the Kahikateas is 4 lux.

A BMP and compensation assessment has been undertaken by Blue Wattle Ecology which outlines requirements for the management of adverse effects of the Hub on bat habitat.

The proposal seeks to mitigate these potential effects through the adoption of a Bat Management Plan and habitat compensation model through pest control measures.

The assessment that the level of effects on can be mitigated to very low to low though the imposition of the above.

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). These drains will be infilled as part of the development of the site.

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 drains do potentially 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) has been prepared in accordance the WRC guidelines, mitigating potential adverse effects to any aquatic biota present onsite. This has been attached as **Appendix HB.**

Provided the FMP is implemented and followed during construction, potential adverse effects on freshwater habitat and biota will be mitigated to less than minor levels.

Overall Ecological Effects Summary

In accordance with the provided technical assessments and the imposition of management plans, the overall ecological effects of the Hub can be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Archaeological Effects

An archaeological assessment of the site has been undertaken by Dr Warren Gumbley which has been attached to the application as **Appendix L**. 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 Maaori horticultural site, notably containing seven borrow pits and an area of Maaori 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.

The estimated extent of the Maaori 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.

It is proposed to destroy the southern portion of the site, to allow for the development of the training track, subject to an approved archaeological authority from Heritage New Zealand and ongoing engagement with Mana Whenua.

The remainder of the archaeological site (approx. 1.6ha) is proposed to be retained and protected via a covenant therefore preserving elements of the borrow pits and horticultural remains and protecting these from future development.

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

Most of the soils within the proposed project area are poorly drained Te Kowhai series or relatively poorly drained Bruntwood Series loams. This, together with the distance from the Waikato River or one of its waka-navigable tributaries, means that additional archaeological sites outside of the identified area are unlikely to occur within the project 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. Covenants are a means of protecting and managing archaeological sites. The covenant's provisions and conditions should be developed in conjunction with Ngāti Hauā and Ngāti Korokī Kahukura. It is important to determine the extent of Māori-made soils and related archaeological deposits in the area to be covenanted to support 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.*

   A covenant should consider the following:

   a. *The extent of the Māori-made soils must be determined precisely, and a 25 m buffer zone should be applied to define the working boundary of the area to be protected by covenant.*

   b. *Most of the modern fill in the borrow pits in the area to be covenanted should be removed to increase their visibility, as they are currently difficult to discern in the landscape.*

   c. *The area within the covenant should be maintained in grass.*

   d. *No trees or shrubs should be planted within the covenanted area.*

   e. *No cultivation or soil disturbance should occur within the covenanted area.*

   f. *Interpretation or similar should be located to the margins of the covenanted area, within the buffer margin.*

3. *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, prepared by Dr W Gumbley). The archaeological management plan may be revised as necessary with the consent of Heritage New Zealand Pouhere Taonga. Compliance with the archaeological management plan, including the incidental finds protocol, will ensure that archaeological features identified for preservation are recognised and preserved. A copy of the Archaeological Management Plan is included with the application.*

4. *An archaeological investigation of the section of S15/573 affected by the back track and residential development must be conducted to recover archaeological information that would otherwise be lost.*

5. *Archaeological investigation shall be directed by an Archaeological Research Strategy included with the application (Archaeological Research and Mitigation Strategy: S15/573, Duncan Road, Pukeroro, Waikato, August 2026). The research strategy may be revised as needed, with the consent of Heritage New Zealand Pouhere Taonga.*

Dr Gumbley has also 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 the 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 Maaori horticultural processes and will therefore provide an archaeological benefit.

Subject to the implementation of the management plan and research and mitigation strategy and protection of the remainder of the archaeological from future development site via a covenant, it is considered archaeological effects will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Cultural Effects

The site falls within the Rohe of Ngaati Korokii Kahukura and Ngaati Hauaa. Cultural Values Assessments have been prepared by both Hapuu and are attached as **Appendix K.**

Both assessments conclude that the site occupies a culturally significant landscape containing important whakapapa, cultural, archaeological, environmental and spiritual values.

Both assessments also state support conditional on meaningful partnership, protection of significant cultural features, strong environmental management, cultural monitoring, and recognition of mana whenua values throughout the life of the project.

A memorandum of understanding (MoU) **(Appendix W)** has been prepared between mana whenua and the applicant establishing an ongoing relationship that provides a clear framework for engagement, collaboration, and shared long-term outcomes. This includes a commitment to ensuring any contaminated land identified within the site during the development of the site is disposed of to an appropriate location and not re-used on-site as fill.

As part of the requirements of the MoU, a Cultural Management Plan (CMP) will prepared to guide cultural monitoring, ongoing engagement, and the protection of cultural values throughout the development. This will be required as a condition of consent. This is referenced in the following draft conditions provided within **Appendix T;**

- Condition 28 of **Appendix TB;**
- Condition 27 of **Appendix TC;**
- Condition 21 of **Appendix TD;**
- Condition 21 of **Appendix TE.**

A viewing platform has been provided on Pencarrow Road providing views of the site and viewshafts to Maungatautari and Pukeroro to the west and Kakepuku in the south, recognising the cultural significance of these maunga.

The precinct incorporates improved stormwater management and ecological restoration. This improves the overall health of the Waikato River catchment,

Furthermore, while total avoidance of the cultural site was not possible due to site constraints, the amendments to the layout of the development for the substantive application has resulted in a larger area of the site being preserved than demonstrated in the referral application. The remaining area of burrow pits and horticultural soil will be protected in perpetuity in accordance with the avoidance principles expressed in the CVAs.

Based on the above, it is considered that cultural effects will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Lighting Effects

Obtrusive light spill is required to comply with standard AS/NZS 4282:2023 Obtrusive light spill can have adverse effects on amenity values of neighbouring sites, along with potential impacts on road safety.

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

This memo identifies 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).

To achieve the required obtrusive light parameters to comply with the obtrusive light code the following mitigation measures are proposed to be taken:

- Computer aided analysis of the obtrusive light enabling mast heights and spacings, floodlight types and beam distributions, and floodlight aiming directions to be determined to achieve the obtrusive parameters
- The employment of externally fitted metal louvres and shields to the floodlights in order to physically cut-off light at obtrusive angles
- The use of state-of-the-art polymer optical lenses installed over the floodlight LED 's to produce a glare shield for obtrusive light control.
- The adoption of some, or all, of the above measures will guarantee the obtrusive light - spill light, glare and light intensity – will be reduced to levels stipulated by the obtrusive code.

In addition to the above, the proposed track lighting is only operational for a limited period each day for training purposes, with the harness racing track lighting operating on a once-a-week basis for a temporary period.

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

A finalised lighting design will be required to be provided as a condition of consent to the satisfaction of Council to ensure any adverse environmental effects as a result of light spill will be less than minor. This design will take into account the mitigation measures identified above to ensure compliance with AS/NZS 4282:2023.

This is referenced in the following draft conditions provided within **Appendix T;**

- Condition 111 of **Appendix TB;**
- Condition 94 of **Appendix TC;**
- Condition 97 of **Appendix TD;**
- Condition 86 of **Appendix TE.**

Based on the above, it is considered that lighting effects will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Acoustic Effects

The key noise generating activity related to the WTR events is related to the PA system for announcements and race alarms, along with traffic noise and construction and vibration noise.

The acoustic assessment prepared by BBA Acoustics (**Appendix P**) confirms that acoustic effects arising from the Precinct can be successfully mitigated to less than minor levels through the imposition of a Noise Management Plan (NMP), Construction Noise and Vibration Plan (CVNMP) and construction of acoustic walls in certain sensitive locations. These are proposed to be between 1.8m and 2m high.

Racing Acoustic Effects

The acoustic assessment outlined that for daytime thoroughbred racing, During the daytime periods, PA and crowd noise rating levels up to 50dB are expected at the most exposed neighbouring sites, consistent with District Plan requirements. A maximum instantaneous noise level of up to 75 dB max is expected for the final stretch when the PA is at its loudest, or typically up to 65-70 dB max for standard announcements.

These occasional events are expected to be audible above the background noise levels for outdoor living areas and for internal areas with windows open.

Whilst these noise levels will be occasional audible, they are of a sufficiently low level to not cause significant disturbance to typical daytime residential activities.

During the evening periods with only the harness racing PA system operating, maximum rating levels of 42dB are predicted at the edge of the WTR site achieving the GRUZ limit of 45db. Maximum instantaneous noise levels of 67dB are predicted for the loudest PA announcement during the homestretch, which is expected to be audible in external areas and faintly audible internally with windows open for brief moments. Restricting the PA system volume level to 75db is proposed.

Based on the above, the general noise level anticipated from racing activity on the site can be mitigated to an acceptable level through managing PA noise levels and the imposition of the required management plans through conditions of consent.

Training Acoustic Effects

As discussed above, acoustic effects from training operations are minimal and will comply with District Plan requirements at notional boundaries. The main acoustic effect relates to vehicles entering and leaving the site during the early hours.

Acoustic fencing is proposed to be constructed along the site boundaries where they adjoin neighbouring properties (as demonstrated on the architectural plans), which will mitigate any acoustic effects relating to vehicle noise to less than minor levels.

Construction Noise and Vibration

Due to the large amount of earthworks required for the site, some annoyance from ongoing construction noise is expected, even while the permitted limits. These can be significantly reduced and managed by implementing noise barriers where required for works in close proximity and a CNVMP.

A construction noise and vibration management plan (CNVMP) will be prepared as a condition of consent that ensures the required compliance distances are achieved, and appropriate barriers or bunds are installed prior to works commencing. This is referenced in the following draft conditions provided within **Appendix T;**

- Condition 60 of **Appendix TB;**
- Condition 66 of **Appendix TC;**
- Condition 58 of **Appendix TD;**
- Condition 48 of **Appendix TE;**

Where the compliance distances cannot be achieved, the CNVMP details the mitigation, management and liaison with receivers to minimise potential adverse effects.

In regard to vibration, with the exception of the vibratory roller, all construction activities are not expected to generate significant levels of vibration.

Further, these activities will occur at adequate distances from receiver buildings, complying with the recommended human amenity and building damage limits with a large factor of safety.

Implementation of the CNVMP will ensure that any adverse environmental effects relating to construction noise and vibration will be able to be mitigated to an acceptable level where adverse effects are less than minor.

Overall Acoustic Effects Summary

With the recommended restrictions on PA levels, operational times, noise barriers and imposition of management plans, the overall acoustic effects from the Hub can be mitigated to a reasonable level and effects on acoustic amenity will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Natural Hazards

The site is not subject to any identified natural hazards or hazard policy overlays.

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 Y**), it is considered that the risk of flooding occurring on the site is currently medium, which can be mitigated to low through specific engineering design and conditions of consent.

The geotechnical report (**Appendix G)** 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.

It is considered that through detailed engineering design, it is considered that natural hazard effects will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Capacity of Highly Productive Land

A productivity assessment has been prepared by Agfirst (**Appendix Z**) which has assessed the land use classification of the site and summarised the potential land uses of the site for primary production.

While a large portion of the site contains versatile high-class land, there are also areas of this land that subject to wetness and drainage limitations. In the wider context, the approximately 150.8 ha of LUC Class 1 and 2 land within the site represents approximately 0.1% of the Waikato District's LUC Class 1–3 land resource.

While there are no long-term productive constraints on the land, the proposal offsets the cumulative loss of HPL via the release of urban zoned land for development that reduces the need to rezone further areas of HPL. This achieves social and economic benefits that significantly outweigh the long-term social and economic costs associated with the loss of highly productive land, which has been outlined in the Productivity Assessment and EIA.

A modern racecourse requires extensive flat, contiguous land, together with convenient access to established training and horse bases, urban areas for general public access, infrastructure, services and supporting amenities. These requirements materially constrain the number of locations capable of sufficiently and efficiently accommodating the activity. this is particularly relevant in the Waikato context, where HPL is extensive around the main urban areas.

A number of sites were considered for the location of the Hub, however, opportunities to accommodate the Hub while avoiding productive rural land are non-existent within the Waikato. Each of the alternative sites explored contained productive land to an extent. Therefore, a realistically available alternative location that could accommodate the Hub while not resulting in a loss of productive land is unavailable.

In terms of primary production, there is no shortage of land within the Waikato district that primary production can be undertaken, compared with the location requirements for the Hub, which is extremely limited in location choice.

Furthermore, 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 precinct does reduce the productive capacity of highly productive land in the short term, the precinct 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.

Based on the above assessments, it is considered that effects on highly productive land will be appropriately avoided or mitigated such that there will not be significant adverse effects and they will not be out of proportion to the significant regional benefits of the Hub.

Mitigation and Monitoring

Clause 6(1)(d) of Schedule 5 of the FTAA requires that an assessment of effects includes a:

- description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity.

A description of the mitigation measures proposed is provided in the technical assessments attached to this application and summarised in the above sections of this report.

Further mitigation is proposed via the proposed consent conditions within **Appendix TB.**

Clause 6(1)(g) of Schedule 5 of the FTAA also requires that an AEE include "if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved".

The monitoring proposed as part of the construction of the development is also outlined in the proposed consent conditions where relevant.

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 site-specific mitigation measures to mitigate the effects of the precinct.

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

14. ASSESSMENT OF RELEVANT STATUTORY DOCUMENTS

This section of the application is provided in accordance with clauses 5(1)(h), 5(2) and 5(3) of Schedule 5 of the FTAA.

As discussed above, the FTAA requires that applications must include an assessment of the activity against the relevant provisions and requirements of those documents listed in clause 5(2).

The Hub is assessed against the relevant documents in the below sections.

12.1 National Environmental Standards

National Environmental Standards for Air Quality (NES-AQ)

The NES-AQ 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 Erosion and Sediment Control Plan. Drafts of these management plans are attached as **Appendix QB and QH.**

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

National Environmental Standards for Freshwater (NES-F)

As per the Water Classification Memo prepared by Ecology New Zealand and attached to this application within the Ecological Assessment as Appendix 2**,** the existing drainage network within the site that is proposed to be infilled is considered to be an artificial watercourse. WRC have confirmed that they agree with this assessment.

The Ecology Assessment also notes the presence of a small natural wetland within the Kahikatea stand, which is covered under Regulation 53 of the NES-F.

Activities which detrimentally impact the wetland are considered non-complying or prohibited depending on the level of activity. In this case, the proposed rehabilitation works occurring within the Kahikatea stand works will enhance the areas and will not result in adverse impacts to the wetland.

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

National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS)

The NESCS 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 PSI undertaken as part of the referral application (attached as **Appendix J**), several HAIL activities were identified on the site.

A Discretionary Activity Consent is required under the NESCS as HAIL activities have been identified on-site but the risk to human health has not been quantified, draft conditions of consent are attached as **Appendix TG.**

A draft Contaminated Site Management Plan (CSMP) has been provided (**Appendix JI**.), which demonstrates that risks to human and environmental health can be successfully mitigated.

12.2 National Policy Statements

The following National Policy Statements are considered relevant to the proposal.

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
- avoiding any further loss or degradation of wetlands and streams, map existing wetlands, and encourage their restoration.

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.

An Ecological Management Plan (EMP) has been prepared to this effect, which is attached as **Appendix HA**

Therefore, it is considered that the proposal is consistent with the NPS-FM objectives and policies.

National Policy Statement for Highly Productive Land 2022 (NPS-HPL)

The 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 and December 2025. The 2025 amendment took effect on the 15th of January 2026.

As per the provided productivity assessment prepared by Agfirst **(Appendix Z)** The Pencarrow site is classified as productive land, as it is mapped as mostly Land Use Capability (LUC) 1s 1, 2s 3 and 2w 7. There is an area of 4e 4 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), WDC 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 identified for residential / future 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.
- A modern racecourse requires extensive flat, contiguous land, together with convenient access to established training and horse bases, urban areas for general public access, infrastructure, services and supporting amenities. These requirements materially constrain the number of locations capable of sufficiently and efficiently accommodating the activity. this is particularly relevant in the Waikato context, where HPL is extensive around the main urban areas.
- A number of sites were considered for the location of the Hub, however, opportunities to accommodate the Hub while avoiding productive rural land are non-existent within the Waikato. Each of the alternative sites explored contained productive land to an extent. Therefore, a realistically

available alternative location that could accommodate the Hub while not resulting in a loss of productive land is unavailable.

- In terms of primary production, there is no shortage of land within the Waikato district that primary production can be undertaken, compared with the location requirements for the Hub, which is extremely limited in location choice.

- The ancillary land use components of the Hub also result in a loss of productive land. However, these precincts form part of the wider integrated development and, respond to identified market demand while contributing to the broader functioning and efficient utilisation of the Site. Therefore, the wider economic benefits they generate should be assessed against the effects of the loss of productive land

- 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 HPL 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 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.

Under clause 3.10, Waikato District Council may allow HPL 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 HPL 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 HPL in the district

- avoids the fragmentation of large and geographically cohesive areas of HPL

- avoids if possible, or otherwise mitigates, any potential reverse sensitivity effects on surrounding land-based primary production from the subdivision, use, or development

- 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 HPL 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 HPL which have been outlined in section 13 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 HPL 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.

National Policy Statement for Indigenous Biodiversity (NPS-IB)

The NPS-IB ensures the protection, maintenance and restoration of New Zealand's most threatened indigenous species.

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

- The Hub seeks to maintain and enhance indigenous biodiversity through rehabilitation and protection of the Kahikatea stand and wetland within the site. The wetland area identified within the Kahikatea stand is also proposed to be retained and protected.

- The Kahikatea stand meets criteria for identifying areas that qualify as significant natural areas (refer to Appendix 1 NPS-IB) is relevant. Applying these criteria, the Kahikatea stand on site 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 Kahikatea Stand will be managed in line with the requirements of the ecological impact assessment and ecological and bat management plans.

- While the Hub results in potential habitat loss for long-tailed bats, a Bat Management Plan has been drafted and habitat compensation model through pest management prepared, which allows for improved ecological outcomes in regard to bat habitat off-site.

- Ngaati Hauaa and Ngaati Korokii Kahukura have provided their support in principle via Cultural Values Assessments, recognising and providing for the management of indigenous biodiversity through preparation of a memorandum of understanding between the applicant and Hapu.

- 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 development of the Hub is consistent with the NPS-IB.

National Policy Statement for Urban Development 2020 (NPS-UD)

The 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 Hub 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 and deferred residential development respectively. The establishment of the Hub allows these two sites to be developed for residential development in accordance with the underlying District Plan zoning.

- The Cambridge harness track (14.8ha) is also live zoned for Medium Density Residential development, which adds additional development capacity to the Waipa region within an existing urban limit.
  The location of these 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 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.

- 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.

- 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.

- The Hub provides for a variety of homes that meet the needs of different households and have good accessibility for future residents to Hamilton and Cambridge, including through active transport via the Te Awa cycleway.

- The proposed residential lifestyle lots and commercial precinct will provide additional development capacity for both housing and business land over the short, medium and long term.

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

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
- 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 Y**), it is considered that the risk of flooding occurring on the site is currently medium, which can be mitigated to low through specific engineering design and conditions of consent.

The Geotechnical Report (**Appendix G)** concludes that the risk of liquefaction occurring onsite 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.

Waikato Regional Policy Statement (WRPS)

The WRPS sets out the overarching framework for management of the region's natural and physical resources.

The WRPS seeks to protect and enhance the Waikato region's environmental, social, cultural, and economic wellbeing by addressing key issues such as water quality, land use, natural hazards, biodiversity, and the relationship of iwi with natural resources.

The Hub supports a regionally significant industry that is linked to rural land resources, reinforcing the WRPS objective of enabling activities that contribute to regional prosperity and employment, particularly where there is a functional need for a rural location.

In relation to transportation, the site's location adjacent to the Waikato Expressway and within close proximity to both Hamilton and Cambridge enables efficient regional access while avoiding new direct access to the state highway network. This is consistent with WRPS direction on protecting the function of nationally significant transport corridors and managing effects on the wider transport system. Additionally, the Hub is located adjacent to the Te Awa cycleway, allow for further access via active transport methods.

While the Hub represents an out of sequence development in accordance with Future Proof documents, APP13 of the WRPS allows for this to be considered if, amongst other things, the development demonstrates meeting a need or shortfall of housing and commercial space and contributes to a well-functioning urban environment.

The assessment below comments on key topics under the WRPS that are of relevance to the proposal.

Integrated Management

- The Hub achieves integrated management by providing a range of housing diversity and options (including senior living), to accommodate the housing needs of current and future generations. This is discussed further in the provided EIA.
- The Hub can be efficiently serviced by onsite infrastructure and will contribute to increasing housing supply and choice for the community, while supporting a regionally significant industry.
- The proposal includes a stormwater management plan that has been informed by allowances for climate change and its effects.

- The Hub incorporates a landscaping strategy that includes retaining and enhancing the stand of existing Kahikatea trees within the site and the establishment of internal and boundary landscape planting.

Land and Freshwater

- The existing natural wetland within the site will be subject to enhancement planting, while the existing artificial drainage network within the site will be replaced by a network of bio vegetated swales, reducing downstream impacts and ensuring hydraulic neutrality, while also improving water quality above what currently exists.
- The source aquifer of the proposed groundwater take has sufficient water available for allocation to service the entire development.
- All proposed earthworks must be undertaken in accordance with the Waikato Regional Council 'Sedimentation and Erosion Control Guidelines'. The application includes a comprehensive erosion and sediment control plan, which will be required to be certified as a condition of consent.
- While the site contains high-class soils, the provided HPL assessment confirms that in a regional context, the site only represents 0.1% of HPL available within the Waikato region. Therefore, the loss of high-class soil as a result of the hub is considered outweighed by the strategic benefit of delivering well-integrated and serviced growth while supporting a regionally significant industry.

Ecosystems and Indigenous Biodiversity

- The Hub supports the restoration and enhancement of a degraded, under-represented stand of indigenous vegetation. Outside of the Kahikatea stand and wetland, the site currently exhibits a low ecological value due to extensive past modification.
- The development protects and enhancing the features of high ecological value within the site through rehabilitative native planting and the implementation of an ecological management plan and management plans for wildlife.
- The development does not reduce the significance of any vegetation or habitat and contributes positively to site-wide ecological outcomes.
- While the Hub results in potential habitat loss for long-tailed bats, a Bat Management Plan has been drafted and habitat compensation model through pest management prepared, which allows for improved ecological outcomes in regard to bat habitat off-site.

Hazards & Risks

- The site is not subject to any identified flood hazards. Flood modelling undertaken as part of the application **(Appendix Y)** concludes that under the proposed stormwater design the site will not experience any notable (>100 mm) locations of flooding that coincide with proposed buildings, provided that Culvert-1 is designed to avoid any blockage.
- The Flood Assessment has recommended mitigation measures to ensure that there are no upstream or downstream effect as a result of the Hub.
- The flood modelling undertaken has taken into account climate change scenarios and future rainfall, and it is considered that flood hazards have been appropriately managed on the site. The site is not subject to any other natural hazards.
- As discussed above, contaminated land and acid sulfate soils will be appropriately managed to avoid the potential effects of contamination and acid sulfates and remediate the contamination during the proposed earthworks.

Urban Form & Development

- While the Hub presents an alternative land use pattern as identified in map 43 of the WRPS, the Hub represents a logical location given the central location between Hamilton and Cambridge and is located in an area which already consists of rural residential scale development despite the

underlying rural zoning. The Hub has been assessed as being regionally significant by central government, therefore justification exists for the development occurring out of sequence.

- While the Hub is proposed to occur outside of the areas indicated in policy UFD-P11, the proposal does not result in industrial activity, therefore points 4, 5, 6 and 7 of UPD-P11 are not relevant to the proposal.
- The overall development can be effectively and efficiently serviced by on-site, self-contained servicing, ensuring that the development does not compromise the operation of other infrastructure within the area, and does not result in the inefficient expansion of infrastructure or result in conflict with planned infrastructure as per UFD-P14;
- While the site contains HPL, the Hub has been recognised as providing significant regional benefits that outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production.
- As discussed above, while the underlying zoning of the area is Rural, the actual land development pattern consists of smaller lifestyle blocks less than 1ha in size consistent with rural residential development. While the site contains high-class soils, the site is not subject to natural hazards, industry, electricity transmission, renewable energy sites or significant mineral resources.
- By enabling additional housing, employment and commercial activities to be accommodated on existing racecourse land (which is located within existing urban limits and is therefore within a growth area) through the consolidation of the existing sites, the precinct and Hub overall reduces the amount of additional greenfield land required elsewhere to accommodate the same underlying growth.
- There is a projected shortfall of senior living options within the Waikato district post 2028. The development of the senior living precinct will contribute to addressing this shortfall, particularly within the aged care space. the proposed senior living component would provide additional capacity within a market where a material increase in senior accommodation and care provision demand is expected over the medium and long term. The precinct will also contribute to increasing the range and choice of senior living options available to the growing senior population and reduce the risk of future supply constraints.
- The residential lifestyle precinct broadens housing choice by providing additional product aligned with demonstrated market preferences for this form of development. As part of the wider greenfield racecourse development, the residential lifestyle precinct is planned alongside the Hub's other land uses, infrastructure, access and amenity outcomes. This provides an opportunity to accommodate lifestyle demand within a coordinated development framework and to integrate the scale and form of the precinct with the efficient development of the wider site.
- The proposal is supported by a suite of technical assessments providing a robust understanding of long-term effects and cumulative impacts of the development.

Overall, it is considered that while the site is not located within an identified growth area, the location of the site is logical given the location between Hamilton and Cambridge and the surrounding land uses, which consist of mostly rural residential scale development.

Waikato Regional Plan (WRP)

An assessment of the Hub against the relevant provisions of the WRP has been provided as **Appendix UA**.

An assessment of the Hub against the relevant objectives and policies of the WRP has been provided as **Appendix UB**.

Overall, the proposal is generally consistent with the relevant objectives and policies of the WRP.

Waikato District Plan

An assessment of the Hub against the relevant rules of the Operative (ODP) and Operative in Part Waikato District Plans (WDP) has been provided within **Appendix UC**.

Overall, resource consent is required for a prohibited activity due to the residential lifestyle subdivision.

An assessment of the Hub against the relevant objectives and policies of the WDP has been provided as **Appendix UB**.

Other Plans

Te Ture Whaimana

Te Ture Whaimana o te Awa o Waikato (Vision and Strategy for the Waikato Awa) recognises the significance of the Waikato Awa to Waikato-Tainui, with the vision, objectives, and strategies applicable to Waikato Awa tributaries and catchment.

The Vision and Strategy (V&S) is acknowledged as the primary, direction-setting document for the Waikato Awa.

In order to realise the Vision, 13 objectives are identified.

These objectives are:

a. *The restoration and protection of the health and wellbeing of the Waikato River*

b. *The restoration and protection of the relationship of Waikato-Tainui with the Waikato River, including their economic, social, cultural, and spiritual relationships.*

c. *The restoration and protection of the relationship of the Waikato River iwi according to their tikanga and kawa, with the Waikato River, including their economic social, cultural, and spiritual relationships.*

d. *The restoration and protection of the relationship of the Waikato region's communities with the Waikato River including their economic, social, cultural, and spiritual relationships.*

e. *The integrated, holistic and coordinated approach to management of the natural, physical, cultural and historic resources of the Waikato River.*

f. *The adoption of a precautionary approach towards decisions that may result in significant adverse effects on the Waikato River, and in particular those effects that threaten serious or irreversible damage to the Waikato River.*

g. *The recognition and avoidance of adverse cumulative effects, and potential cumulative effects, of activities undertaken both on the Waikato River and within its catchments on the health and wellbeing of the Waikato River.*

h. *The recognition that the Waikato River is degraded and should not be required to absorb further degradation as a result of human activities.*

i. *The protection and enhancement of significant sites, fisheries, flora and fauna.*

j. *The recognition that the strategic importance of the Waikato River to New Zealand's social, cultural, environmental and economic wellbeing requires the restoration and protection of the health and wellbeing of the Waikato River.*

k. *The restoration of water quality within the Waikato River so that it is safe for people to swim in and take food from over its entire length.*

l. *The promotion and improved access to the Waikato River to better enable sporting, recreational, and cultural opportunities.*

m. *The application to the above of both maatauranga Maaori and latest available scientific methods.*

When considering the above objectives, the Hub is considered to be generally consistent with Te Ture Whaimana o Te Awa o Waikato for the following reasons.

- The Hub will manage sediment and stormwater contaminates close to source.
- Adverse changes to downstream stormwater flows will be limited.
- The Hub's contribution will avoid or minimise the cumulative degradation of the Waikato River catchment through its engineering design.
- The Hub will not result in the loss of any natural wetlands or watercourses.
- All aquatic fauna that is discovered will be salvaged during any infilling of artificial watercourses in line with the site-specific Fish Management Plan (FMP) attached the application as **Appendix HB.**
- All site works will be undertaken in accordance with a specific Erosion and Sediment Control Plan, to minimise any downstream effects of sediment entering waterways and ensure no runoff occurs.
- Development of the Hub will result in the wetland area within the Kahikatea stand be restored and enhanced, improving water and habitat quality.

Subject to the implementation of the detailed engineering design, construction controls, maintenance obligations and ecological enhancement, the Hub is expected to protect the receiving environment and contribute to the long-term restoration and protection sought by Te Ture Whaimana.

Waikato Tainui Environmental Management Plan – Tai tumu tai pari tai ao

The Waikato-Tainui Environmental Plan (Tai Tumu, Tai Pari, Tai Ao) (WTEP) is a strategic document that articulates Waikato-Tainui's vision for environmental restoration and sustainable management of natural resources within their rohe, particularly in relation to the Waikato River and its catchment.

It emphasises restoration, intergenerational responsibility, and the integration of tikanga Māori into environmental management.

Section 25 of the WTEP refers to land use planning and development activities and includes objectives and policies which accept that development activities will occur on the basis of achieving positive environmental outcomes and overall environmental enhancement initiatives.

In this respect, the WTEP is considered to enable this type of development provided that potential environmental effects are appropriately managed and the overall environmental management objectives of these documents are achieved.

- The Hub has given regard to Te Ture Whaimana and protecting the health of the river.
- Bulk earthworks during construction will be required to follow site-specific environmental controls outlined in a comprehensive ESCP certified by Council.
- This will ensure that sediment and control stormwater discharges from the site are appropriately managed during the construction phase. As part of the design for the site all stormwater will be treated and significant volumes retained onsite. Discharges will be restricted to the equivalent predevelopment flows.
- Engagement with mana whenua has been ongoing prior to the substantive application as the views of mana whenua are acknowledged as of significant importance to the Hub. This is supported with

the MoU that establishes an ongoing relationship and provides a clear framework for engagement, collaboration, and shared long-term outcomes.

- Furthermore, the Hub is supported by cultural values assessments from both Ngaati Hauaa and Ngaati Korokii Kahuhura, which have indicated support of the proposal subject to a number of recommendations. Engagement also occurred directly with Tainui who support the views of both Ngāti Haua and Ngāti Koroi Kahukura.

- Careful consideration has been adopted in preliminary designs to ensure potential effects from site discharges to land and to water are appropriately designed and managed.

Despite representing a change in the use of the site, the overall objective of the Hub is to achieve a sustainable outcome which extends to constructing the Hub to a very high standard and avoiding, remedying or mitigating adverse effects.

Therefore, the proposal is considered to consistent with the intent and objectives of the WTEP.

Future Proof

While the site sits outside identified urban growth areas, the development responds to Future Proof's recognition that large-scale, regionally significant projects and employment-generating activities may require flexibility where they deliver demonstrable net regional benefit. The Hub has been referred to the fast-track process, demonstrating the Hub's regional benefits across multiple sectors.

In this case, the consolidation of multiple urban racetrack sites into a single purpose-built racing and equine facility, along with supporting ancillary activities, enables the release of strategically located urban land for housing and employment growth within existing settlements, supporting a more compact and efficient urban form.

The location of the Hub is designed to leverage existing and planned regional transport infrastructure, including the state highway network and proximity to Hamilton Airport, minimising the need for unplanned or inefficient infrastructure expansion in relation to transport. The precinct will also serve the needs of the community by providing commercial options in close proximity and reduces the need to travel further into Hamiton or Cambridge.

The EIA has assessed the senior living precinct against the Future Proof retirement living study, which has identified a projected shortfall of approximately 430 senior units and care beds by 2033, under the medium growth/high market penetration scenario. This shortfall is projected to expand further to around 1,040 units and care beds under the high growth/high market penetration scenario. Therefore, the precinct addresses an identified shortage of housing over the medium to long term in accordance with Future Proof expectations.

Importantly, the precinct introduces housing options within a distinctive, racecourse-integrated setting, offering an alternative to more conventional urban or rural lifestyle opportunities. This unique environment has the potential to attract niche segments of the market seeking amenity, open space, and a strong sense of place.

As such, the Hub overall is consistent with Future Proof objectives relating to regional benefits, economic productivity, and infrastructure alignment.

Waikato 2070

The Hub supports the Waikato 2070 Growth Strategy by contributing to employment generation, economic diversification, and regional resilience.

Although the site is not located within an identified urban growth area, the proposal aligns with Waikato 2070s recognition that the rural economy is a cornerstone of regional prosperity and that certain employment-generating activities are most appropriately located in rural environments due to their land requirements, operational characteristics, and industry linkages.

Importantly, the development does not promote rural residential expansion or lifestyle subdivision as the key aspect of the Hub. Instead, it introduces a structured, master planned employment and activity precinct that introduces housing options within a distinctive, racecourse-integrated setting, offering an alternative to more conventional urban or rural lifestyle opportunities and supports a major regional industry.

By consolidating racing and training functions into a single location and enabling the redevelopment of existing urban racetrack sites, the proposal supports Waikato 2070 objectives relating to balanced growth, economic opportunity and long-term spatial efficiency.

Statutory Document Summary

Overall, it is considered that the proposal is generally consistent with the policy direction of the relevant statutory documents, including with to policy direction contained in the NESCS, National Policy Statements for Freshwater, Urban Development, and Indigenous Biodiversity, WRPS, WRP, and WDP with respect to the provision of infrastructure, including for three waters and transport, landscaping.

It is acknowledged that the proposal is not entirely consistent with the broader direction of the NPS-HPL with respect to highly productive land and similar provisions under the WRPS and WDP which also seek to manage highly productive land and activities in the Rural Zone.

Notwithstanding this, the site represents approximately 0.1% of high-class soil within the Waikato Region and it is considered that the proposal achieves an appropriate development outcome in relation to productive land, given the consolidation of racing infrastructure releases significant areas of land within existing urban limits, avoid the need to rezone further rural land for urban development. In addition, the proposal supports a predominantly rural industry which has a direct functional need to be located in a rural setting.

Therefore, while the Hub has inconsistencies with aspects of the assessed statutory documents, overall, the Hub is consistent with the objectives of these documents relating to the health of the Waikato River, infrastructure, transport and economic development.

15. STATUTORY REQUIREMENTS RELATING TO IWI AUTHORITIES

Treaty of Waitangi Settlements and Redress

This section of the application is provided in accordance with clause 5(1)(i) of Schedule 5 of the FTAA, which requires an application to provide information about any Treaty settlements that apply in the Hub area, including:

(i) the identification of the relevant provisions in those Treaty settlements
(ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the Hub or project area

The Treaty settlements discussed below are relevant to the site due to the respective iwi groups having an interest over the area the site is located.

However, we do not consider that any provisions of the treaty settlements apply to the site as only Crown assets are involved in the redress offered, and the statutory acknowledgments are over Crown owned land only.

The assessment below is therefore provided for completeness.

Waikato Raupatu Claims Settlement Act 1995

The Hub has been designed and progressed in a manner that is consistent with the principles and obligations arising from the Waikato Raupatu Claims Settlement Act 1995. While the site lies within the Waikato River catchment and is not subject to specific co-governance arrangements or statutory acknowledgements under the Act.

The development acknowledges the historical significance of raupatu (land confiscation) to Waikato-Tainui and recognises Te Whakakitenga o Waikato as a Treaty settlement entity with enduring mana whenua interests in the region.

The Hub team has undertaken engagement with iwi authorities, including Waikato-Tainui, and are committed to ensuring this remains ongoing through the processing of the substantive application to ensure Treaty settlement interests are respected and iwi are appropriately involved in the process. The Hub has been designed to give effect to the principles of Te Ture Whaimana, which has been discussed above.

Through this approach, the Hub upholds the Crown's duty of consistency under section 7 of the Fast-track Approvals Act and aligns with the intent of the 1995 settlement to restore the relationship between Waikato-Tainui and the Crown, including through meaningful recognition of rangatiratanga over lands within the settlement area.

Waikato Raupatu Claims (Waikato River) Settlement Act 2010

As discussed above, the Hub site is located within the Waikato River Catchment. The 2010 Act acknowledges the Waikato River as an ancestor and establishes the Waikato River Authority alongside co-governance and co-commitment mechanisms and requires local authorities and developers to "have regard to" the Vision and Strategy for the Waikato River.

The Hub gives effect to the Waikato Raupatu Claims Settlement Act through:

- initiated early and ongoing engagement with Ngaati Hauaa and Ngaati Korokii Kahukura and a MoU for future collaboration, which is consistent with co-management principles under the Act
- undertaken engagement with the Waikato River Authority
- undertaken preliminary design with the view of enhancing water quality and ecological function within the river catchment, in recognition that the Act's Vision and Strategy applies broadly to activities "affecting the Waikato River".

Through these measures, the Hub demonstrates respect for the co-governance ethos, acknowledgment of the status of the Waikato River.

Ngaati Hauaa Claims Settlement Act 2014

The Hub is located within the rohe of Ngaati Hauaa and therefore is subject to the Ngaati Hauaa Claims Settlement Act 2014, which settled the non-raupatu historical claims of the iwi and provides for statutory acknowledgements, conservation protocols, and rights of first refusal over specified land.

Although no Ngāti Hauā-vested cultural redress sites are located within the Hub area, the FTAA requires consent authorities and applicants to engage with the Ngāti Hauā Iwi Trust.

The applicant acknowledges these obligations and is committed to ongoing and meaningful engagement with Ngaati Hauaa through the development of the Hub.

A MoU between the applicant, Ngaati Hauaa and Ngaati Korokii Kahukura has been drafted which acknowledges opportunities for hapu input through design, embedding cultural narratives, conservation relationship protocols, and opportunities for iwi to contribute to ecological restoration and environmental kaitiakitanga throughout the development.

Raukawa Claims Settlement Act 2014

Raukawa Charitable Trust provided commentary on the application during the referral process.

Raukawa noted that while a portion of the Hub area falls within the Raukawa Area of Association, the site is well removed from the core area of Raukawa mana whenua interests.

Accordingly, Raukawa Charitable Trust does not consider that ongoing engagement with Raukawa is required for the hub.

Joint Management Agreements

Joint Management Agreements (JMAs) are in place between Waikato Regional Council, Waikato District Council and Waikato-Tainui regarding the Waikato River and activities within the river catchment. The subject site falls within the Waikato River Catchment.

The JMAs provide Waikato-Tainui the opportunity to participate in local government activities so far as they relate to the Waikato River.

JMAs relate to the exercise of the following functions, powers and duties under the Resource Management Act 1991:

- *Monitoring and enforcement;*
- *Preparation, review, change, or variation of a Resource Management Act 1991 planning document;*
- *Duties, functions, or powers under Part 6 of the Resource Management Act 1991 in relation to applications for resource consents; and*
- *Processes relating to customary activities*.

The Hub is subject to JMA requirements and agreed process for the consideration of resource consent applications.

Customary Marine Title, Customary Rights and Ngaa Rohe Moana o Ngaa Hapu o Ngaati Porou

This section of the application is provided in accordance with clause 5(1)(j) of Schedule 5 of the FTAA which requires:

a list of any relevant customary marine title groups, protected customary rights groups, ngaa hapuu o Ngaati Porou (where an application is within, adjacent to or directly affecting ngaa rohe moana o ngaa hapuu o Ngaati Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;

The site for the Hub is not located in a customary marine title area.

There are no protected customary rights that relate to the site for the Hub and as such an assessment under clause 6(1)(h) is not required.

The site for the Hub is not within or adjacent to, and would have no effect on, ngaa rohe moana o ngaa hapuu o Ngaati Porou.

Clause 17 of the FTAA

Clause 17 of Schedule 5 of the FTAA sets out the criteria and other matters for assessment of consent applications.

This relates to the purpose of Section 81 of the FTAA which outlines the process for making decisions on substantive applications.

Clause 17 states that when considering a consent application, including conditions in accordance with clauses 18 and 19, the Panel must take into account the following, giving the greatest weight to

- The purpose of the FTAA
- The provisions of Parts 2, 3, 6, and 8 to 10 of the Resource Management Act 1991 that direct decision making on an application for a resource consent (but excluding section 104D of that Act)
- The relevant provisions of any other legislation that directs decision making under the Resource Management Act 1991.

Section 81(4) of the FTAA states that when taking the purpose of the FTAA into account, the Panel must consider the extent of the Hub's regional or national benefits. The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

As described in section 13 of the above, the proposal has significant regional benefits, as assessed by both the Government,

having been referred to the fast-track process under the FTAA and as assessed in the application documents.

Therefore, the Panel would give effect to the purpose of the FTAA by granting consent as this would enable the development of the Hub to occur.

The criteria at clause 17 also states that the various provisions of the RMA must also be taken into account, excluding s104D and Section 8 of Part 2.

The assessment included in this AEE demonstrates that the proposal is consistent with the relevant provisions of the RMA.

The proposal is considered to be consistent with the purpose of the RMA as described above.

In terms of the actual and potential effects of the proposal on the environment (s104(1)(a)), the proposal will have significant positive social and economic effects, by supporting a regionally significant industry, enabling job creation and economic growth for the district and wider Waikato region, while enabling increased housing supply through the consolidation of racing infrastructure.

Where the Hub is likely to generate adverse effects, these are temporary / intermittent in nature and/or can be appropriately mitigated through the design of the development, management plans and proposed consent conditions.

The Hub seeks to significantly improve ecological outcomes on the site through protection, restoration and planting within the Kahikatea stand and the identified wetland on site. The Hub also improves water quality through the construction of bio vegetated swales for stormwater management, improving overall water quality.

In regard to long tailed bats, a Bat Management Plan has been drafted, which allows for improved ecological outcomes in regard to bat habitat and successfully mitigates any adverse effect on bats.

Therefore, the Hub will deliver net positive ecological benefits.

16. DRAFT CONDITIONS OF CONSENT

This section of the application is provided in accordance with clause 5(1)(k) and clause 18 of Schedule 5 of the Act.

These clauses require that an application provides conditions for the resource consent.

The proposed conditions of consent which seek to implement the mitigation measures that have been identified as being necessary are included as **Appendix T.**

In recommending the proposed conditions of consent for this application in accordance with Clause 5(1)(k) of Schedule 5, the conditions are proposed to:

- Appropriately manage adverse effects, including providing mitigation to prevent or reduce adverse effects during and after construction in accordance with Clause 6(1)(d) of Schedule 5; and

- Give effect to those matters that the panel must consider under Section 81(2)(a).

The conditions are not considered to be more onerous than necessary and comply with Section 83 with reference to Section 81(2)(d), and it is considered that they meet the requirements of the FTAA.

17. CONCLUSION

The Hub is a comprehensive mixed-use development, which contains a large racing precinct for both thoroughbred and harness racing and training, residential lifestyle and senior living precincts, a bloodstock precinct and a commercial development.

The following conditions for Fast-Track approval have been met.

- Appropriate consultation and engagement have been undertaken with Waikato and Waipa District Councils, along with Hamilton City Council, Waikato Regional Council, mana whenua and the relevant administering agencies.
- Significant consultation has been undertaken with the wider community and adjoining neighbours. The design of the development has been refined where possible in response to the feedback received from these parties.
- Consideration of iwi management plans and statutory planning documents recognised by Waikato District Council has been undertaken.
- The actual and potential adverse effects of the proposal will be no more than minor subject to appropriate conditions of resource consent, will be successfully avoided, remedied or mitigated.
- The Hub is generally consistent with the relevant Waikato Regional Plan and Waikato District Plan objectives, policies and assessment criteria.
- The Hub meets the requirements of the NESCS.
- The Hub generally consistent with the NPSIB, NPSUD, and NPSFM.
- The Hub achieves the purpose of the FTAA to facilitate delivery of infrastructure and development projects with significant regional or national benefits.
- The Hub is considered to be consistent with Parts 2, 3, 6, and 8 to 10 of the RMA.
- The Hub is considered to be consistent with the purpose, principles, and relevant sections of the HZHPT Act.