

BEFORE THE WAIKATO DISTRICT COUNCIL

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

AND

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

**REBUTTAL STATEMENT OF EVIDENCE OF ALISTAIR WHITE, PLANNER,
FOR AND ON BEHALF OF REID INVESTMENT TRUST (SUBMITTER 783 AND FS1279)
CONCERNING STATEMENT OF EVIDENCE OF TANYA RUNNING FOR NZTA (SUBMITTER 742)**

3 APRIL 2020

1. My name is Alistair Wyatt White. I am the Managing Director of Planning Focus Limited, based in Auckland. I hold the qualifications of BRP (Hons) (Massey) and have been a full member of the New Zealand Planning Institute since 1993. I have twenty-six years planning experience, the last twenty-three of which have been in a consultancy capacity. I formed Planning Focus in 2004. Planning Focus is a development planning practice involved in projects throughout New Zealand, but primarily in the Auckland Region. We provide planning services to publicly-listed and private companies and individuals. Our practice is grounded in the industrial sector.
2. I confirm that I have read the Code of Conduct for Expert Witnesses 2014 contained in the Environment Court Practice Note and I agree to comply with it. My qualifications as an expert are identified above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.
3. Tanya Running has filed a planning statement of evidence dated 19 March 2020 on behalf of the New Zealand Transport Agency ("NZTA"). Per the Minute and Directions from [the] Hearing Commissioners dated 20 March 2020, submitters have the opportunity to file rebuttal statements by 3 April 2020.
4. Paragraphs 4.3 to 4.5 of Ms Running's statement concern the submission lodged by Reid Investment Trust seeking a re-zoning of the site it owns at 29 Hampton Downs Road ('the site'). The site is legally described as Lot 6, Deposited Plan 411257, contained in Identifier 500903, and comprising 1.3587 hectares. Whilst the zoning of the site will be considered in full within Hearing 25, Ms Running has requested leave to register her opposition to the relief sought by Reid Investment Trust. In evaluating that request, the Commissioners will be aware that, until the NZTA designation over the substantial area of the site is uplifted¹, the Reid Investment Trust would require NZTA's approval to undertake any activities on their site.
5. Perhaps Ms Running was not aware that the site was included in the 2006 resource consent (Waikato District Council Reference LUC005/06), and continues to be used for car parking during large events within Precinct A. This association is reflected in the Operative Waikato District Plan 2013, which identifies the site as a parking area associated with the motorsport park. As identified in my evidence in chief, the Reid Investment Trust intend developing their site for light industrial purposes, such as warehousing and vehicle workshops, consistent with the existing industrial units opposite the site within Precinct E, whilst continuing to enable any undeveloped areas to be used for car parking associated with Precinct A.
6. Ms Running has cited traffic as the only reason for her opposition to any re-zoning. However, traffic needs to be considered in light of the limited development potential and capacity of the site, and the nature of land uses that would be enabled. The site is only 1.3587 hectares, is elongated and of highly irregular dimensions, and contains various easements, and is further burdened by an overtly generous 25m setback from the Rural zone.
7. If we assume a maximum development scenario and compliance with the 45% site coverage rule (if it could realistically be achieved due to the site's unhelpful shape), 6,114sqm of gross floor area

¹ Para 6.2 of the statement of evidence of Mike Wood for NZTA dated 20 March 2020 concerning Hearing 15: Designations acknowledges the NZTA designation is now surplus to requirements, and will be uplifted

('GFA') could potentially/technically be developed. Any such development will very likely only be single level (noting the 10m height limit) and include a nominal, if any, ancillary office.

8. The recognised daily trip rate for light industrial development in a large metropolitan area is 4 trips per 100sqm GFA, and the corresponding peak hour trip rate is approximately 0.5 trips per 100sqm GFA². From discussions I have had with a senior Traffic Engineer based in Auckland, I am advised that the use of these rates for this situation and context are highly likely to result in an over-estimation of the potential traffic generation.
9. Notwithstanding, the resultant traffic numbers of full development could potentially/theoretically be in the order of 245 vehicle trips³ per day and 31 vehicle trips in the peak hour. These are not high traffic numbers in a planning context, and I am informed by the Traffic Engineer I have consulted that they are also exceptionally low from a traffic engineering perspective. Therefore, it is expected that the traffic effects can be readily accommodated by the roading network, including the proximate State Highway 1 interchange.
10. In anticipation of Hearing 25, I have commissioned an architectural bulk and location plan to test what GFA can be achieved on the site. I will be also asking the Traffic Engineer I have consulted to provide a statement of evidence in regards the traffic effects of same, and to also provide any comments on the Hampton Downs Motor Sport and Recreation Zone, and submissions, as they relate to the relief sought by the Reid Investment Trust.
10. Finally, Ms Running should be aware that my evidence in chief on Hearing 13, which I will also use as the basis for my evidence for Hearing 25, acknowledges it may be appropriate to insert provisions within the Hampton Downs Motor Sport and Recreation Zone and/or the associated traffic management planning, to appropriately manage the traffic movements to/from the site during the peak hourly movements of Major and Extreme Events within Precinct A.

Alistair White
3 April 2020

² Roads and Maritime Services of New South Wales (*previously known as the Toads and Traffic Authority of New South Wales*)

³ For clarity, the arrival and departure of one vehicle generates two trips