

Appendix L – Waikato-Tainui Environmental Plan Assessment



1. Introduction

The Waikato Racing Club Incorporated ('WRCI') is the owner and operator of the Te Rapa Racecourse. The Racecourse is the only horse racing events venue in Hamilton and has been in existence since 1924.

There is surplus land at the Te Rapa Racecourse ('the Racecourse') which is currently not being efficiently utilised. The WRCI wishes to make provision for the land to be developed for medium density residential uses which will be complementary to its core business activities at the Te Rapa Racecourse.

Private Plan Change 13 proposes to rezone the site as Medium Density Residential Zone, providing the opportunity to create a unique residential lifestyle offering through a comprehensively planned residential development adjacent to the Te Rapa Racecourse. The rezoning will allow the land to be developed to take advantage of the site's open characteristics and its location near to the Hamilton Central Business District, The Base shopping centre, other commercial and employment activities in Te Rapa and local amenities such as Minogue Park and the Waterworld swimming pool complex.

It is proposed the site will be developed for a variety of standalone, duplex, terraced and apartment living. The living environment has been planned to provide an environment closely integrated with the Racecourse. In addition to providing an attractive gateway to the racecourse, the residential development will also enable the establishment of some dwellings which will enjoy an outlook over the racetrack and adjoining park like grounds. It is likely that the higher density residential development will be clustered around these areas.

The residential development area is approximately 6.5ha. The concept design indicates that the likely yield is approximately 200 residential dwellings based on a mix of single dwellings, duplexes, terrace houses and apartments.

2. Waikato-Tainui Environmental Plan – Tai Tumu Tai Pari Tai Ao

The Waikato-Tainui Environmental Plan - Tai Tumu Tai Pari Tai Ao (the Plan) was developed from the long-term development approach document called Whakatupuranga Waikato Tainui 2050, which is the blueprint for cultural, social and economic advancement for Waikato-Tainui. The key strategic objectives of the Plan include tribal identity and integrity, with the Plan "designed to enhance Waikato-Tainui participation in resource and environmental management. The overarching purpose of the Plan is to provide a map or pathway that will return the Waikato-Tainui rohe (region) to the modern-day equivalent of the environmental state that it was in when Kiingi Taawhiao composed his maimai aroha".

The Plan is recognised as the relevant planning document for Waikato-Tainui Te Whakakitenga o Waikato Inc as the Iwi Authority for Waikato-Tainui. As per s74(2A) of the RMA, the Plan is therefore required to be taken into account by a territorial authority when preparing or changing a district plan. As the proposed private plan change requests an amendment to the Hamilton City District Plan, it is appropriate to assess the proposed plan change against the Plan.

The objectives and policies contained in the Plan are articulated generally, with a number of relevant aspects to the Racecourse area. The following assessment goes into detail on the matters of importance for Plan Change 13.

3. Consultation and Engagement with Waikato-Tainui (Chapter 6 WTEP)

Chapter 6 of the Plan highlights the importance of consultation with Waikato-Tainui and ensuring it is undertaken in a consistent, participatory manner.



The applicant has been engaging with Waikato-Tainui since commencement of preparation of Plan Change 13.

Letters were sent in September 2017 to the Waikato Raupatu Lands Trust and Te Ha o te Whenua o Kirikiriroa (THaWK) outlining the proposed plan change ensuring that both Waikato-Tainui and THaWK were aware of the proposal. These outlined that technical investigation was underway and that an assessment of the Waikato-Tainui Environmental Plan: Tai Tumu Tai Pari Tai Ao would be undertaken as these technical reports were finalised. THaWK subsequently provided a letter of support.

The plan change was subsequently placed on hold for several years by WRCI, but has now been reactivated, and engagement with Waikato-Tainui has recommenced, alongside further engagement with THaWK and Ngaati Wairere.

This report assesses the proposed plan change against the Waikato-Tainui Environmental Plan: Tai Tumu Tai Pari Tai Ao.

4. Assessment of the Plan

4.1 Chapter 7: Towards Environmental Enhancement *Te Whakapakari i te Taiao*

The goal of Waikato-Tainui is to ensure that the needs of present and future generations are provided for in a manner that goes beyond sustainability towards an approach of environmental enhancement. The Plan requires the consideration of how the proposed plan change can enhance the environment. It is identified that this may include a strategic approach to development and ensuring there is efficient urban form.

The rezoning of the Racecourse site will utilise an area of land that has been identified as surplus to the needs of the WRCI. Rezoned to medium density residential, the land will provide for approximately 200 dwellings. This represents an efficient use of a brownfield site to provide infill housing in Hamilton. Infill housing is a positive outcome as it uses land that has already been urbanised and is serviced, reducing the need for urban sprawl into rural areas.

4.2 Managing Effects

To assist in the development of the proposed plan change, a number of reports have been commissioned. These provide an understanding of any possible adverse effects, and include:

- An integrated transport assessment
- An Integrated Sub-Catchment Management Plan (ICMP)
- An acoustic report
- A contamination report
- A geotechnical report
- An urban design report

These reports have addressed site suitability and include recommendations. They will be used to inform the proposed plan change provisions. Any effects identified will be either avoided, remedied, minimised or mitigated.



4.2.1 Precautionary Approach

The Plan sets out that resource consents that are granted for resource use that have potential ongoing effects on the social, economic, cultural, spiritual or environmental wellbeing of Waikato-Tainui, a precautionary approach is encouraged to allow for a consent renewal process.

The effects of residential development are well known. Due to the nature of the proposed activity, it is not considered there are any ongoing adverse effects on the well-being of Waikato-Tainui. Therefore, a review or renewal process does not need to be included in the proposed provisions of the plan change.

4.3 Section C: General Waikato-Tainui Environmental Matters

The following identifies and assesses the strategic objectives and policies of the Plan that are relevant to the plan change.

4.3.1 Chapter 10: Tribal Strategic Plan

The strategic objectives in Chapter 10 Tribal Strategic Plan are already considered in part by the District Plan through Chapter 2 Strategic Framework, which is also applicable to the Racecourse Plan Change. Specifically, the Strategic Framework incorporates objectives and policies which acknowledge and promote the important relationship that tangata whenua have with Hamilton City. These include:

- **Objective 2.2.8** and its subsequent policies recognise the importance of restoring the health and well-being of the Waikato River. They also recognise the importance of enhancing the natural, cultural, heritage and amenity values of the River. The relationship between Waikato-Tainui and the Waikato River is specifically recognised and provided for.
- **Objective 2.2.9** set out “Resource management priorities are to be developed in partnership with tangata whenua”.
- **Policy 2.2.9c** confirms that decisions on land use, subdivision and development include ongoing consultation and collaboration with tangata whenua where appropriate, as part of the development process.

As this is a private plan change, it is proposed to address the above policy through consultation with Waikato-Tainui, THaWK and Ngaati Wairere ensuring any concerns that are raised are taken into account. The group of technical reports includes a sub-catchment ICMP which addresses the management of three waters on the subject site, acknowledging that the development is within the catchment of the Waikato River.

4.3.2 Chapter 11: The Vision and Strategy for the Waikato River

Objectives within Chapter 11 of the Plan relate to giving effect to the Vision and Strategy of the Waikato River and state the following:

- **Objective 11.7.1** *Te Ture Whaimana prevails in any resource management, use and activity within the Waikato River catchment in the Waikato-Tainui rohe.*
- **Objective 11.7.2** *Te Ture Whaimana is a guide to resource management, use, and activities in all catchments within the Waikato-Tainui rohe.*

Chapter 1 (Plan Overview) of the District Plan, specifically part 1.1.2.2b), considers the Vision and Strategy of the Waikato River. This and the related sections of the ODP for example, Volume 2, Appendix 10: Waikato River Corridor and Gully Systems, sets out Te Ture Whaimana o Te Awa o Waikato, the Vision and Strategy for the Waikato River. The proposed plan change will be embedded within the wider District Plan policy framework. Therefore, any activities proposed in the plan change area would be required to address these



policies as necessary. The Vision and Strategy for the Waikato River is embedded into the District Plan and consequently will be taken into account in the development of the Racecourse area.

In considering the proposed plan change, it is important that the development suitability of the proposed site is considered to ensure that the rezoning will not create adverse effects on the receiving environment. To address this, a sub-catchment ICMP has been prepared for the Racecourse. This addresses the strategies and solutions for three waters demand management within the proposed development area. A summary of the findings of the ICMP are discussed in more detail below.

Stormwater

The PC13 area and the adjacent internal roading network and grandstand and car parking are all currently serviced with stormwater reticulation. There are however no known stormwater treatment or attenuation measures on site. It is proposed to manage stormwater through the existing reticulated network but with new measures put in place to manage stormwater quantity and quality prior to discharge to the network.

As runoff from the site ultimately discharges to the Waikato River, the ICMP considers that a high level of water quality treatment is vital.

The proposed stormwater management strategy considers the priorities set out in the District Plan at section 25.13.2.3e which are based on the following hierarchy;

- Priority 1 – Retention for reuse
- Priority 2 – Onsite retention (soakage)
- Priority 3 – Detention and gradual release to a watercourse
- Priority 4 – Detention and gradual release to stormwater reticulation.

Retention for reuse (Priority 1) can be provided in the form of rain harvesting tanks for roof runoff and reuse for non-potable uses. This has benefits in terms of reduced loading on the network. It is largely a matter for the detailed design and subdivision/development stage, rather than a plan change.

Further geotechnical assessment of soakage capacities across the site will be needed at the detailed design stage to identify areas where ground soakage (Priority 2) is viable. This has benefits of reduced discharge volumes and also recharge to the natural groundwater system.

In terms of Priorities 3 and 4 the strategy is collection and conveyance of stormwater to a centralised wetland device for treatment and attenuation of post-development flows. The specifically designed stormwater system will provide water quality treatment and attenuation functions alongside the ecological and aesthetic values of the wetland. Stormwater runoff from the existing racecourse buildings, carparks and roads currently occurs in an uncontrolled manner into the receiving environment. It is proposed to also connect these existing stormwater discharges to the wetland device for treatment and attenuation prior to discharge to the existing piped system. Therefore, overall this is an improvement to the existing stormwater system of direct discharge to the reticulated network.

In addition, a further opportunity has been identified to capture and divert the currently uncontrolled runoff from part of the upstream industrial area, for treatment and attenuation within the proposed wetland, resulting in retrospective improvements in stormwater quality and quantity from this part of the developed catchment. This will require an increased land area for the wetland, and coordination with HCC to implement connections to properties outside the PC13 area. Once established, the proposed wetland device is understood to be the only specifically designed stormwater management device in the broader catchment contributing to a higher level of stormwater quality.



Stormwater volume will be controlled through attenuation and protection of overland flow paths to ensure that the development does not exacerbate flooding. Flooding during a 1 in 100 year storm event has been identified across part of the site. The Plan Change will be designed to avoid buildings on that part of the site.

The sub-catchment ICMP sets out recommendations for stormwater management and a detailed stormwater management plan will be developed at the time of development occurring on the site.

Wastewater

The area subject to the proposed plan change is currently well serviced by wastewater infrastructure. Modelling shows that the additional demand placed on the wastewater network from the proposed residential development is not expected to have adverse effects on the HCC wastewater network.

Due to the high-water table in the area and the proposed layout of the development a number of design considerations have been proposed in the ICMP to ensure that wastewater infrastructure is efficient and able to be serviced if required in the future.

Water supply

The proposed development area is serviced with existing water supply infrastructure. Modelling showed there was sufficient capacity in the existing network to provide a sufficient level of service to the proposed development.

4.3.3 Chapter 12: Right of First Refusal on Crown Lands

The land is not owned by the Crown. Therefore, there is no need to consider this chapter.

4.3.4 Chapter 13 – Waikato-Tainui Communities

The objectives and policies of Chapter 13 of the plan addresses papakainga and outlines the importance of providing papakainga for Waikato-Tainui.

- **13.3.1** Papakainga development is sustainable and supported.
- **13.3.1.1** To ensure that papakainga development is sustainable and supported.
- **13.3.1.2** To ensure that papakainga are able to be developed within rural and urban areas.

Papakainga are provided for in the Medium Density Residential Zone as a Restricted Discretionary Activity and therefore may be developed if resource consent is applied for and granted. The proposed plan change adopts many of the provisions of the Medium Density Residential Zone. Papakainga are therefore provided for in the activity status table of the proposed plan change in line with the provisions of other residential areas of Hamilton City.

4.3.5 Chapter 14 – Customary Activities

Chapter 14 addresses the unique and historical relationship of Waikato-Tainui with its traditional lands and waterways. Objectives and policies that may be relevant are identified below.

- **Objective 14.3.1** Waikato-Tainui access to and ability to undertake customary activities and resource use, including along the margins of waterways, is protected and enhanced.
- **Policy 14.3.1.1** To ensure that Waikato-Tainui is provided access to regionally, spiritually, and culturally significant sites to undertake customary activities and resource use.
- **Policy 14.3.2.3** To recognise and provide for recognised Waikato-Tainui customary activities.
- **Policy 14.3.2.4** To restore, protect and enhance customary activities and resource uses.



- **Policy 14.3.2.5** To work collaboratively with other resource users to manage competing interests around access to and ability to undertake customary activities and resource use.

The district plan does not identify any sites associated with customary activities within the Racecourse area. There are no waterways running through or on the site. It is not considered that the proposed change in zoning will impinge on customary activities.

4.3.6 Chapter 15 – Natural Heritage and Biosecurity

Chapter 15 relates to natural heritage and biosecurity, highlighting the loss of habitat and the introduction of pests in the Waikato as an issue. The plan identifies that inefficient resource development, use and associated activities and infrastructure risk may be compounding these matters.

The objectives and policies of this chapter highlight the need to protect and support indigenous flora and fauna. Some of these are included below.

- **Objective 15.3.1** The full range of Waikato ecosystem types found throughout the Waikato-Tainui rohe are robust and support representative native flora and fauna.
- **Policy 15.3.1.1** To ensure that the full range of Waikato ecosystem types found throughout the Waikato-Tainui rohe are robust and support representative native flora and fauna.
- **Objective 15.3.2** Cultural, spiritual and ecological features of the Waikato landscape that are significant to Waikato-Tainui are protected and enhanced to improve the mauri of the land.
- **Policy 15.3.2.1** To ensure that there is greater protection and enhancement of cultural, spiritual and ecological features of significance to Waikato-Tainui.

The Racecourse is in an urban environment and has been used for racing since 1924. There are no areas of vegetation that have significant natural value or any trees that have been classified as significant. The development of the plan change area will result in the loss of some established trees; however, these are not considered to significantly contribute to Hamilton's biodiversity.

Three waters will be managed to ensure there are no adverse downstream effects that would impact on natural heritage or biodiversity, and that there are improvements in relation to stormwater discharges.

4.3.7 Chapter 16 – Sites of Significance

This chapter considers the management of ngaa taonga tuku iho (valuable historical items), waahi tapu (highly prized sites), waahi tuupuna (sites of significance), including archaeological sites. The objectives and the policies of the plan address the management of these, should they be discovered during development.

The relevant objectives and policies include:

- **Objective 16.3.1** Site management protocols exist to ensure a precautionary approach to site works to manage the potential for waahi tapu and taonga tuku iho discovery.
- **Objective 16.3.3** Waikato-Tainui manages and/or owns all identified waahi tapu and waahi tuupuna.
- **Policy 16.3.3.1** Waahi tapu and waahi tuupuna are identified and information is stored and shared appropriately
- **Policy 16.3.3.2** Waikato-Tainui marae are actively engaged to ensure the appropriate management of waahi tapu and waahi tuupuna.
- **Objective 16.3.4** Procedures are in place to manage the discovery of taonga and archaeological sites.
- **Policy 16.3.4.1** To ensure that appropriate guidelines are in place for undertaking archaeological surveys and excavations (information and permission)
- **Policy 16.3.4.2** To ensure that a clear protocol is followed in the event of discovering taonga.



- **Objective 16.3.5** The adverse effects of resource use and activity operation are managed so as to appropriately protect areas and sites of significance.

There are no known sites of significance on the plan change site, however there is still the chance that artefacts may be discovered during the development phase of the plan change area. The proposed plan change will be embedded in the Hamilton District Plan and the provisions of other relevant chapters will apply. This includes chapter 19: Historic Heritage. This chapter includes objectives to protect significant archaeological and cultural sites from damage or destruction. The chapter also identifies that the relationship of tangata whenua with sites of spiritual, cultural or historical significance needs to be recognised and provided for. At the time of resource consent for any development works involving the disturbance of soils, archaeological sites and other sites of cultural significance is an important factor to consider. Approved resource consents have a standard process for the precautionary approach to archaeological sites which may be uncovered. That process is considered to be appropriate to identify any unrecorded sites of significance to iwi. Further, Appendix 8-2 of the District Plan provides guidance on the correct process to follow should accidental discovery occur during earthworks on any site and will apply to development on this site, this is usually reflected in the conditions of any consent granted which involves earthworks.

The district plan does not identify any sites of significance for Iwi within the Racecourse area. There are no waterways running through or on the site. It is not considered that the proposed change in zoning will impinge on significant sites.

4.3.8 Chapter 17 – Natural Hazards

This chapter addresses natural hazards and the need to ensure that development does not exacerbate the consequences of natural events. This includes managing the effects of climate change. Objectives include:

- **Objective 17.3.1** Land use and the construction of structures occurs in a way that does not increase the risk or magnitude of a natural hazard event, and that does not increase the risk or effects on human life or activity in the event that a natural hazard event occurs.
- **Objective 17.3.2** The risk of adverse effects on human, cultural, spiritual, or environmental wellbeing shall be prioritised over risks to individual properties when assessing natural hazard risks and/or the need for hazard protection structures.
- **Objective 17.3.3** The cause and effects of climate change are understood and prepared for within the Waikato-Tainui rohe.

Chapter 22 of the district plan includes provisions to manage natural hazards. There are no hazard overlays identified in the district plan for the Racecourse. However, the sub-catchment ICMP has identified an existing overland flow path across part of the site in a 100 year return period storm event. The Plan Change has been designed to ensure the area of the overland flow path is contained within open spaces and roads, and buildings are excluded. More specific building and foundation design matters in relation to natural hazards will be assessed in detail at the time of resource consent.

4.4 Assessment of Specific Objectives and Policies

This section identifies and assesses those objectives, policies and methods associated with natural resources where relevant.



4.4.1 Te Wai Maori – Fresh Water

This section of the plan deals with the management of freshwater. Objectives relevant to the plan change include:

- **Objective 19.4.2** Water quality is such that fresh waters within the rohe of Waikato-Tainui are drinkable, swimmable and fishable in all places (with water quality to the level that Kiingi Taawhiao could have expected in his time)
- **Objective 19.4.3** An integrated and holistic approach to management of water is achieved
- **Policy 19.4.3.1** To ensure that there is an integrated and holistic approach to catchment management that is effective and informative and the scope of planning is broad.

The site is physically isolated from freshwater bodies within Hamilton, the closest water body being the Waikato River approximately 1.5km to the east. As such, the site is within the Waikato River catchment. The existing HCC stormwater infrastructure on the site eventually discharges to the Waikato River. Chapter 25.13 (Three Waters) of the District Plan deals with the management of water for development. A sub-catchment ICMP has been prepared for the proposed plan change and specifically considers the proposed residential development.

As set out in section 4.3.2 above the ICMP provides a range of measures and design options to ensure that the quality of stormwater from this development will be managed to firstly ensure compliance with the water quality level necessary for Hamilton City Council to meet its Comprehensive Stormwater Discharge Consent requirements. The ICMP also acknowledges that runoff from the proposed development will ultimately end up in the Waikato River and therefore a high level of water quality treatment is vital. The plan change provides for on-site stormwater management to manage water quality, flow attenuation and balance of flood volumes on the site. The primary method for achieving the above stormwater management is via treatment and attenuation wetland. The wetland area and stormwater management requirements will be included in the Precinct Plan to be inserted into the District Plan. The Sub-catchment ICMP confirms that the development will be able to be serviced without resulting in downstream effects on HCC networks and ultimately, the receiving environment. As set out in more detail in section 4.3.2 above, it also outlines how the stormwater management will result in an improvement in stormwater quality being discharged.

Existing wastewater infrastructure has been assessed to have sufficient capacity for the additional development anticipated on this site without creating adverse effects on the network.

The existing HCC water supply can provide a sufficient level of service on the site without creating adverse effects on the network, including for firefighting purposes. Therefore, the additional demand can be accommodated and no further water takes are required.

Construction effects will be addressed via erosion and sediment control and best practice construction methodologies that will be implemented at the time of resource consent. This is standard practice.

For the above reasons, the proposal is considered to be consistent with the policy direction of the WTEP in relation to freshwater and the Sub-catchment ICMP is a suitable integrated approach to management of three waters for the proposed development.

4.4.2 Ngaa Repo – Wetlands

The relevant objectives and policies of this chapter are as follows:

- **Objective 20.3.1** Existing wetlands are protected and enhanced
- **Objective 20.3.2** The relationship of Waikato-Tainui with its wetlands is enhanced through the restoration of wetlands and enhanced/permitted access for cultural purposes.



There are no existing wetlands on the site. The peat lake - Lake Rotokaeo is located to the south of the site in Minogue Park. This is identified and protected by provisions in the District Plan. It is considered that the development of the Racecourse site for residential activity will have no impact on the lake.

It is proposed to establish a wetland on the plan change site for stormwater management for the proposed development area.

This plan change has no impact on wetlands and access to wetlands will not be affected.

4.4.3 Te Whenua – Land

Relevant objectives of the Plan include:

- **Objective 21.3.2** The life supporting capacity of land and soils effectively manages soil nutrient loss and water quality so there is minimal impact on nutrient loss to waterways.
- **Objective 21.3.3** Effectively manage the impact of contaminated land on the surrounding environment.
- **Objective 21.3.4** Integrated catchment management occurs across the entire rohe of Waikato-Tainui, including in catchments that impact on, or flow into the Waikato-Tainui rohe. Integrated catchment management includes the effective and sustainable management of floodplains and drainage areas to promote natural habitat enhancement.

The proposal relates to a portion of land within the urban limits of Hamilton City which is currently being underutilised by the racecourse. The use of the site for residential purposes is considered appropriate for the location and existing site features and the features of the locality. The eventual development will be able to be designed in such a way so as to maintain the general levels that currently exist on the site.

A Preliminary Site Investigation (PSI) has been undertaken to identify the risk of soil contamination. It identifies that there have been stable buildings in the general area of the existing stables since the 1950's. They have since been demolished. Soil adjacent to those current and previous buildings may exhibit elevated contaminant levels, for example from pesticides, petroleum and degraded building materials. The PSI recommends a Detailed Site Investigation (DSI), including soil sampling, be carried out prior to development. If the DSI reveals any contaminated soil appropriate remediation steps should be outlined in a Remedial Action Plan (RAP). These are standard steps to address soil contamination in urban areas and will be incorporated in the Precinct Plan provisions and be dealt with at resource consent stage.

There are no waterways present that require the management of sediment and soil nutrient loss, however stormwater management will take place to ensure that runoff quantity and quality is appropriately managed.

Overall, the proposed plan change will not result in inconsistencies with the land objectives and policies set out in the WTEP and effects can be managed through the resource consent process.

4.4.4 Te Ararangi – Air

The relevant objective states:

- **Objective 23.3.1** The quality and amenity of discharge to air is such that the life supporting capacity and quality of air within the rohe is retained at a level that does not compromise human health, amenity values, or property.



Residential development is not considered to threaten the life supporting capacity and quality of air in Hamilton. The only issue relating to air for this development will be potential dust discharges during construction. These will be managed through resource consent conditions.

The plan change therefore aligns with the WTEP in relation to air.

4.4.5 Ngaa Whakaritenga Moo Ngaa Whenua O Waikato-Tainui – Land Use Planning

This chapter deals with the land use challenges faced by the Waikato in accommodating future development as the area grows. It outlines concerns with urban sprawl and the impacts of development on productive land and the wider environment. Previous development has often given little consideration to cultural and/or spiritual consequences, affecting the relationship of Waikato Tainui communities with their rivers, waahi tapu, sites of significance and customary activities. Objectives include:

- **Objective 25.3.1** Development principles are applied to land use and development (urban and rural) and, in particular, development in new growth cells, that enhance the environment.
- **Objective 25.3.2** Urban and rural development is well planned and the environmental, cultural, spiritual, and social outcomes are positive.
- **Objective 25.3.3** Land use and development has positive environmental and cultural effects.

The WRCI seeks to establish residential development on the subject site, which is not a land use which aligns with the existing zoning of the site. For this reason, the proposal is required to go through a detailed planning process (i.e. this plan change) in order to determine the appropriateness and suitability of establishing such a development in this location. As part of the plan change, detailed assessment and integrated planning has been carried out through a master planning exercise involving a range of experts such as urban design, planners, engineers, noise, contamination, geotechnical and ecological. Engagement has also been carried out with key stake holders including HCC, Hamilton Urban Design Panel, Waikato-Tainui and neighbouring landowners.

The rezoning of the Racecourse will provide an infill opportunity increasing the amount of residential land available within Hamilton. This will occur on land the WRCI has identified as being surplus to its requirements, presenting a sustainable use of land. The development outcome will assist in providing housing for Hamilton's growing population, and in doing so will contribute to intensification within the city boundary, reducing the need to grow into rural areas on the edge of the city.

4.4.6 Waihanga Matua – Infrastructure

This chapter address the development of infrastructure and the need to consider the values of Waikato-Tainui when developing infrastructure. Objectives include:

- **Objective 26.3.1** Infrastructure development, upgrade, and maintenance within the Waikato-Tainui rohe occurs in partnership with Waikato-Tainui.
- **Objective 26.3.2** Infrastructure development, upgrade, and maintenance manages economic, social, cultural, spiritual, and environmental effects.
- **Objective 26.3.3** Liquid, solid, and hazardous waste management is best practice and manages social, cultural, spiritual, economic and environmental effects.
- **Objective 26.3.4** Transportation infrastructure is developed and managed in a manner that provides for social, cultural, spiritual, economic, and environmental needs.
- **Objective 26.3.5** Infrastructure shall be sited and operated in a way to avoid impacting on the risk of natural hazards occurring or the magnitude of a natural hazard event.

The Racecourse is a brownfield development site and will use existing infrastructure including potable water supply, wastewater connections, stormwater reticulation and the surrounding transportation network. The Sub-catchment ICMP and the ITA set out that the proposed plan change area and anticipated development



yield can be appropriately serviced without creating effects on the surrounding existing environment as outlined in previous sections of this report.

Infrastructure planning has been comprehensive throughout the preparation of the plan change documentation and it is considered that the plan change will align with the policy direction of the WTEP relating to infrastructure. Development of the newly zoned land will also be subject to the Hamilton District Plan City Wide Chapter provisions.

5. Conclusion

Proposed PC13 represents a brownfield redevelopment opportunity of significant scale in Hamilton's urban area. The area of the site has been identified as being surplus to the requirements of the WRCI and its development would ensure the efficient use of an existing land resource.

This development aligns well with national and regional policy which is to intensify residential development within existing urban areas to make more efficient use of land and infrastructure and to increase housing supply, thereby contributing to housing affordability. It is well-located in relation to proximity to employment areas, commercial and recreational facilities, and public transport.

Technical reports show that the site is suitable for residential development and there is sufficient capacity in the transportation network, the water supply network and the wastewater network to accommodate the proposed concept design. Stormwater quantity and quality will be managed on site to ensure that runoff is treated to a high level and attenuated appropriately before it is discharged to the reticulated network, including improvement of stormwater quality of existing discharges.

