

**BEFORE THE INDEPENDENT HEARING PANEL ON PROPOSED PRIVATE PLAN
CHANGE 13 TO THE OPERATIVE HAMILTON CITY DISTRICT PLAN**

IN THE MATTER of the Resource Management Act 1991 (the Act)

AND

IN THE MATTER of proposed Private Plan Change 13 to the Hamilton City
District Plan

**Statement of Rebuttal Evidence of Andrew James Castles on behalf of the
Waikato Racing Club Incorporated
Dated: 17 August 2023**

MAY IT PLEASE THE INDEPENDENT HEARING PANEL

INTRODUCTION

1. My name is Andrew James Castles. I have previously given a statement of evidence in relation to the above matter, dated 26 July 2023.

PURPOSE AND SCOPE OF EVIDENCE

2. This statement of rebuttal evidence responds to the evidence filed on behalf of Mr Mark Chrisp and Mr Bevan Houlbrooke dated 9 August 2023.

FUTURE OF TE RAPA RACECOURSE

3. Both Mr Chrisp and Mr Houlbrooke question the future of the Te Rapa Racecourse. Mr Chrisp says that:

[...] in the absence of a clear understanding regarding the future of the balance of the racecourse land, the approval of PC13 significantly increases the risk of further residential development being proposed closer to the Crawford Street Freight Village in the future ..."¹. Mr Houlbrooke says "it is within the realms of possibilities that further rezoning proposals could occur at Te Rapa Racecourse².

4. It is highly speculative to suggest that the Te Rapa Racecourse may have some other use into the future. The racecourse has been part of the landscape of Hamilton for many decades and the Waikato Racing Club Incorporated ("WRCI") currently has no plans not to be based at the current site into the future.
5. As referred to in my evidence-in-chief, a central part of WRCI's plan is to establish a new, modern horse stable complex to replace the stabling blocks that will be demolished as part of the development of the PC13 site. That is an indication of our intention to race at the Te Rapa Racecourse well into the future.

¹ Chrisp EIC, para. [1.5].

² Houlbrooke EIC, para. [74].

6. Of course, it is impossible to predict what future boards and management may see as the future. However, the WRCI is no different to most businesses in that respect.

60M BUFFER/SETBACK

7. Mr Houlbrooke has suggested that the proposed 30m setback for noise sensitive activities from the Industrial Zone boundaries of the site could be increased to 60m and that this is preferred by the submitters that he represents³.
8. I have serious misgivings about the feasibility of developing the PC13 site if a 60m buffer/setback were to be required. The reduction in the number of dwellings possible would likely see the cost of each lot increase, thereby making the subsequent housing less affordable for many. Such a large setback/buffer would also be a wasted opportunity in my opinion in regard to offering housing options in a location with good access to transport and amenities.
9. Mr Mackie's rebuttal evidence addresses the potential implications of a 60m buffer/setback in relation to the master plan which he has prepared on WRCI's behalf. A 60m buffer/setback wouldn't align with the vision that WRCI has for future development of the site.

CONCLUSION

10. I conclude as follows:
 - (a) It is highly speculative to suggest that the Te Rapa Racecourse may have some other use into the future.
 - (b) I have serious misgivings about the effect of a 60m buffer/setback on the feasibility of developing the PC13 site. It would also be

³ Houlbrooke EIC, para. [35].

detrimental to housing affordability, a wasted opportunity for housing options and wouldn't align with WRCl's vision for the site.

A handwritten signature in black ink, appearing to read 'AC', with a stylized flourish extending from the bottom right.

Andrew Castles
Dated: 17 August 2023