Submission on Commissioners’ Minute 13 September 2019

This submission is presented on behalf of RACE Incorporated and is with regard to the preliminary findings minute and subsequent related minutes specifically with regard to:

Preliminary Findings 4-6: General suitability of Kikiwhenua Residential Area for residential development.

Preliminary Findings 12-16: That a residential development would create an environmental change, a short distance away on the other side of Te Wanaka Road which is completely unsuitable for race horses.

Preliminary Finding 20d: We would require, at least, both modification to the Structure Plan for the Kikiwhenua Residential Area, and specific building controls on the eastern side of Te Wanaka Road.

Preliminary Findings 4-6:

We support Commissioners’ view that the Kikiwhenua Residential Area is suitable for residential development and that subject to the resolution of issues listed, should be rezoned Residential to enable residential and ancillary development.

We support Commissioners’ view that the Kikiwhenua Residential Area fits well with the Council’s strategic planning in respect of future greenfield development and will contribute significantly to the achievement of Council’s obligations under the National Policy Statement for Urban Development Capacity.

We request that Commissioners’ make a decision in a timely manner to enable this project to progress.

The key proponent in Kikiwhenua Residential Area is a not for profit racing and training business. All proceeds from Kikiwhenua will be reinvested in the commercial business at Awapuni race course and for the benefit of economic growth and employment in Palmerston North. The development is also the key trigger to establish a synthetic racing and training surface at Awapuni in a partnership with the Provincial Growth Fund.

Any delays in rezoning approval will place this partnership at risk.

Significant sums have been expended to date and we request Commissioners’ support to expedite a decision.
Awapuni race course has been identified as one of three centers within New Zealand that are targeted to be developed as “super centers” for racing and training to revitalize the New Zealand racing industry.

This is in a joint venture partnership between Government, the Industry and RACE Incorporated. All proceeds from Kikiwhenua will be re-invested in this venture which will see world class training facilities established on course at Awapuni including on course stabling, walkers, water walkers and treadmill.

It is important that Commissioners realise that there is only one person on the other side of Te Wanaka Road that is licensed to train a horse down to Kamada Park.

**Preliminary Findings 12-16:**

Preliminary Findings 12-16 raise two points that we wish to address.

Firstly that evidence of various submitters has persuaded Commissioners that leaving a remnant RTZ not only serves no resource management purpose but also disadvantages the owners and occupiers within this zone.

RACE Incorporated is not opposed to the land under discussion being rezoned, and it is our understanding that Council have committed to funding and notifying a Plan Change in the short to medium term to address this issue.

Once that Plan Change has been developed by Council then the land by definition will be rezoned and the RTZ will fall away.

It seems logical to leave the status quo zoning in place until that Plan Change proceeds.

The residents on the RTZ side of Te Wanaka Road make the case that it would be unfair treatment of them if they were left in a remnant RTZ and therefore require a variation to rezone this area at the same time as Kikiwhenua.

Their argument is that because it is dangerous to have horses opposite residential housing then they could not train horses should they wish to do so.

The fact of the matter is that this is incorrect and should they wish to train on that side of the road they could do so with ease so long as they complied with the requirements of RACE Incorporated and were licensed to train at Awapuni.

To rezone the opposite side of Te Wanaka Road will required detailed Structure Planning, geotech and other assessments to be made by Council Planners.
It would mean an unfair delay on Kikiwhenua being rezoned to include the other aside of the road based on totally inaccurate and misleading information being presented to Commissioners.

The other consideration is that if in theory the other side of the road was rezoned through a variation and without consideration of the complexities, it would mean that three of our best licensed trainers would have their activities immediately compromised and subject to controls that would mean they were unable to continue to train including noise, hours of operation, float traffic, horse walkers etc. Please see below:
This then raises the issue of whether horses and residential can live together either side of Te Wanaka Road.

It is stated in the Minute that a residential development would create an environmental change, a short distance away on the other side of Te Wanaka Road which is completely unsuitable for race horses.

With respect this is simply not correct, and if so would mean that at least 50% of race horse training activities within New Zealand would immediately cease.

Throughout New Zealand and Australia horses are trained successfully in close proximity to residential development.

It seems incongruous and vexatious for submitters to suggest that despite having no horses in training and requesting and receiving a commitment from Council to fund and notify a residential plan change, that in the supposed interests of animal welfare that rezoning of Kikiwhenua be delayed.

The submitters on this matter have also claimed significant support for their position on horse safety in their submissions.

I suggest that this is at best a moot point in that the leading trainers on Kikiwhenua and Te Wanaka Road support RACE's submission and do not agree with the claims of the residents and are willing to speak directly with Commissioners should you wish so.

Every member of the Manawatu Racing Club Committee is very experienced with horses and also do not support any of the assertions of the submitters with regard to horse safety. Several of the Committee have and still do actively work with race horses and again would be prepared to discuss directly with Commissioners.

We would like to emphasise and clarify the following points:

1. That Awapuni Racecourse is a private commercial racing and training center owned by RACE Incorporated. A safe and contained horse walkway has been provided by RACE Incorporated for horses to use from the Kikiwhenua side of Te Wanaka Road from the land owned by RACE Incorporated and leased by Licensed Trainers.

2. No horses are trained on the other side of Te Wanaka Road from Pioneer Highway down to Kamada Park at the time of this submission.

If a horse was to be trained on the other side of Te Wanaka Road and if it was given permission to be trained at Awapuni Racecourse by RACE Incorporated then under our health & safety guidelines any such horse would be required to be floated from the property to the Racecourse.
3. All other horses who have permission to train at Awapuni Racecourse have a separate secure internal access route to the racecourse. See Appendix 1

4. Any rezoning by variation would have an immediate negative effect on our existing trainers through residential zoning controls.

5. The vast majority of properties on the other aside of Te Wanaka Road have horse accommodation at the rear of the properties, and ironically for the submitters one of these has horse facilities literally over the fence from 40, 46, 48, 52 and 56 Te Wanaka Road. While not currently used, these facilities have been used while these residential premises were occupied. I find it farcical that submitters can argue the safety case while the only horse in work down to Kamada is physically meters away from residential properties.
6. There are many examples of how horses and residential live in perfect harmony within New Zealand and Australia today.

Appendix 2: Rotorua:

At Rotorua race course horses are stabled and in yards directly opposite residential housing in Marguerita Street.

Appendix 3: New Plymouth:

That extensive stabling and yards are located immediately behind residential housing.

Appendix 4: Levin:

Extensive stabling and yards are located immediately over the road from a new high density residential area marked in blue.

Appendix 5: Hastings:

Wall Road in Hastings is the largest training centre near the Hastings Race Course and is in immediate proximity to intensive residential housing.

Note that as with Awapuni all horses from Wall Road are required to be floated to the Race Course.

Appendix 6: Christchurch:

Riccarton Race Course is the largest training centre in the South Island with all horses directly opposite residential housing on Yaldhurst Road.

Appendix 7: Invercargill:

All training and yards are immediately over the road and over the fence from residential development along Race Course Road.

Appendix 8: Caulfield, Melbourne:

In excess of 1,000 horses are stabled directly opposite residential development on Booran Road. The great Black Caviar lived at number 32 Booran Road.

Appendix 9: Tulloch Lodge, Sydney:

Australian Hall of Fame trainer Gai Waterhouse operates from Tulloch Lodge at Randwick.

The top image is the entrance to Tulloch Lodge, the next two images show the route Gai’s horses take to get to the track down Bowral Road.
Appendix 10: Tempest Morn Lodge, Sydney:

Gai also trains out of Tempest Morn Lodge in Doncaster Street.

Appendix 11: Ascot, Perth

With no on course facilities at Ascot Racecourse, every second residential property from the left hand side of Great Eastern Highway through Matheson Road and to the Race Course have stables and accommodate horses.

Appendix 12: Letter from Group 1 Trainer Jeffrey Lynds

Please see expert opinion from one of New Zealand’s leading trainers.

Appendix 13: Letter from leading Te Wanaka Road trainer Mike Breslin

Please see expert opinion from one of New Zealand’s leading trainers.

7. We respectfully ask Commissioners to recognize the practical ability for Kikiwhenua to be rezoned without any negative impact to horse training, were it to take place.

Preliminary Finding 20d:

We do not support the view that building controls will be necessary for visual amenity on the Te Wanaka Road edge of Kikiwhenua.

On the basis that the submitters have requested a rezoning and that Council have committee to fund and notify such a Plan Change we would assume that if there were building controls on Kikiwhenua / Te Wanaka Road edge that these would logically fall away once the other side of the road was rezoned.

We request that if building controls are proposed that RACE Incorporated is permitted input to these.
In Conclusion:

1. Kikiwhenua residential development is a well thought out development consistent with Government and Local Government policy.
2. All proceeds from Kikiwhenua will be re-invested into the local economy to grow Awapuni as one of three super centers within New Zealand.
3. Awapuni Racecourse is a privately owned commercial operation that has strict rules as to who can train there and how they access the facility.
4. Only one person on the other side of the road down to Kamada Park is approved to train at Awapuni.
5. There is no impediment to having a residential development on the northern side of Te Wanaka Road and having a Race Training Zone on the other side. At the Hearings, no expert evidence was provided to support the claims of the residents. Had we had the opportunity to respond at the Hearings we would have rebutted those claims.
   I have attached expert statements from two of New Zealand’s leading horse trainers who reside on Kikiwhenua and use Te Wanaka Road daily.
6. I have provided 10 examples of NZ and Australia where horses and residential co-exist. Using Christchurch (Appendix 6) as the closest example of a future Te Wanaka Road, there are in excess of 1,000 horses trained and housed in stables and yards directly opposite residential homes and main road traffic.
7. Council have committed to future rezoning of the other side of Te Wanaka Road once responsible structure planning and investigations have been completed.

Alasdair Robertson

Chief Executive, RACE Incorporated, 15 November 2019