

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
APPOINTED BY THE HAMILTON CITY COUNCIL**

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

**IN THE MATTER** of an application for subdivision and land use  
consent for the Amberfield development  
pursuant to the Act.

**APPLICANT** Weston Lea Limited

**CONSENT AUTHORITY** Hamilton City Council

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**EVIDENCE-IN-CHIEF OF JAMES DOUGLAS MARSHALL FAIRGRAY  
FOR WESTON LEA LIMITED**

**Dated: 12 April 2019**

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## SUMMARY OF EVIDENCE

1. My name is James Douglas Marshall Fairgray. My evidence provides an independent assessment of the sports park land area requirement being sought by Hamilton City Council (**HCC**) within the Amberfield subdivision and wider Peacocke growth cell. I summarise my evidence, according to the key headings in this statement, as follows:

### **Context**

*(Page 8)*

- (a) I have supervised a technical review by Market Economics Limited of the sports park land area requirement calculated by HCC. The review covered a number of technical documents produced or commissioned by HCC.

### **Assessment of HCC Sports Park Requirements**

*(Page 10)*

- (b) Key aspects of the review included:
  - i. Identifying the origin of the requested sports park land requirement within the Peacocke Structure Plan process.
  - ii. Assessing the HCC Development Contributions Policies and supporting material to determine the reserve requirement according to DCs.
  - iii. Assessing HCC's approach to establishing the reserves LoS and consequent sports park land area requirement.
- (c) A main purpose of this was to be able to compare the proposed open space land areas within Amberfield and Peacocke with the current existing open space and sports parks levels of service within Hamilton City. These comparisons were used to determine:
  - i. How much land is required for the proposed sports parks to meet the growth needs of Amberfield residents; and
  - ii. What level of population demand would the 6.95ha sports park proposed for Amberfield serve.

- (d) The review of the Peacocke Structure Plan found that:
- i. The Peacocke Structure Plan states that “*two major sports parks have been identified as being required to meet the current standard of provision within the city*” (p54, emphasis added). These parks have a combined land area of approximately 17ha within the Structure Plan.
  - ii. The Structure Plan states the cost of providing reserves will primarily be met through HCC’s Development Contributions Policy.
  - iii. The Structure Plan contained no technical information to support the identified reserves requirement or current standard of provision.
- (e) The DC policies and supporting material state that contributions for reserves can be sought, as part of growth-related costs, to maintain existing LoS across the future population. The policies are not accompanied by specific LoS information supporting to sports park locations or area identified.
- (f) HCC-commissioned reports identify the provision of winter sports fields as the relevant LoS to inform the sports park land requirements within Amberfield and Peacocke. They identify the existing LoS as 1.2ha of sports park area per 1,000 population. This LoS is consistent with the LoS identified within HCC’s section 42A Report.

***Hamilton City Council Calculations of Recreational Space Requirements for Amberfield and Peacocke*** (Page 16)

- (g) The HCC-commissioned reports use the above LoS to identify a sports park land requirement of 2.76ha to serve an Amberfield population of 2,300 residents, and 24ha to serve residents in the total Peacocke area.
- (h) The section 42A Report also identifies a land requirement of 24ha for Peacocke overall, to be supplied across two sports parks. It does not identify the share of the sports park land area required to serve

Amberfield future residents demand. It states that the two parks will serve the full Peacocke Structure Plan area.

- (i) I consider that a range of 2.48ha to 2.76ha land area to serve the future Amberfield population sports fields demand is consistent with the existing LoS within Hamilton City. The lower estimate of 2.48ha is based off an alternative lower population within Amberfield.
- (j) I consider this range appropriate as an initial basis to inform the area required to maintain the LoS, recognising that there is also the potential to supply higher quality fields that would enable a greater number of usage hours and reduce the area of land required.

***Demand Served by the Proposed Sports Park in Amberfield***  
(Page 18)

- (k) I have estimated the level of population that would be served by the 6.95ha sports park area proposed for Amberfield using the existing LoS.
- (l) The above LoS (of 1.2ha of sports park area per 1,000 population) demonstrates that the proposed 6.95 ha sports park within Amberfield would serve an estimated 5,796 population (I note the figure referred to in the section 42A report is 7 ha). I consider that this means it would serve an additional 3,496 (3,500 rounded) to 3,696 (3,700 rounded) people outside of the Amberfield subdivision.
- (m) Under this scenario, sports fields (and their associated land requirements) would be supplied at the same rate and quality as the existing sports fields across Hamilton City.

*Potential to Increase Sports Fields LoS*

- (n) The HCC 2018 Parks and Open Space AMP finds that the “the quality of sports fields [in Hamilton City] is substandard and failing to meet the expectations of users “(HCC, 2018: p14).
- (o) It finds that the LoS can be increased through further investment in the quality of existing fields as higher quality fields (such as those with

better drainage and surfaces) can support a higher number of usage hours. The LoS is partly defined in relation to the type of field and level of drainage.

- (p) In my view, based on the current status of Hamilton City sports fields, I consider the land area requirements identified by HCC is likely to represent a higher bound estimate of the sports fields area required to maintain the existing LoS across future households. This is because, under a different scenario, sports fields can be supplied at a higher quality than the existing Hamilton City average. This means that an equivalent level of demand (as expressed in terms of the hours of usage) can be met through fewer fields.
- (q) I consider that a further alternative scenario for maintaining the existing LoS across future households could also potentially occur through developing additional sports fields within Hamilton City's existing sports parks. This is because a large share of Hamilton City Sports Parks areas were found not to be developed into sports fields.

### **Conclusion**

*(Page 20)*

- (r) In my view, using the defined LoS, 2,48ha to 2.76ha of sports park area is required to maintain the existing Hamilton City LoS across the future Amberfield population.
- (s) Using this LoS, the 6.95ha sports park proposed for Amberfield would serve a population of 5,800. This would include a projected Amberfield population of 2,100 to 2,300, and a further 3,500 to 3,700 population beyond the Amberfield subdivision.
- (t) If the same rates of LoS were applied to Peacocke overall, at an upper estimate of 20,000 future population, then 24ha of sports park area would be required. However, if the Peacocke future population is lower, then the required sports park area will be correspondingly lower.
- (u) I consider that the above LoS identified by HCC is likely to represent a higher bound estimate of the sports park area required to meet the equivalent rate of demand within Peacocke. This is because fields could potentially be supplied at a higher quality (than the existing

identified low quality within Hamilton City) and therefore support the same number of usage hours with fewer fields.

- (v) A high share of Hamilton City's existing sports parks land area is not currently developed as sports fields. I consider it is possible that a share of the additional sports park area could potentially be developed to contain additional sports fields.

## **INTRODUCTION**

1. My name is James Douglas Marshall Fairgray. I have a PhD in geography from the University of Auckland, and I am a principal of Market Economics Limited, an independent research consultancy.
2. I have 40 years' consulting and project experience, working for public sector and commercial clients. I specialise in policy and strategy analysis, evaluation of outcomes and effects in relation to statutory objectives and purposes, assessment of demand and markets, urban and rural spatial economies, land use and core economic processes. I have applied these specialties in more than 900 studies throughout New Zealand.
3. I have qualified as a commissioner, through the Making Good Decisions programme (2017).
4. I am an Associate Member of the New Zealand Planning Institute (since 2013).
5. I have wide-ranging research experience in policy evaluation and impact assessment from an economic perspective, from a range of economic assessments in the Resource Management Act 1991 (RMA) context, including evaluation of the benefits and costs of policy options, and economic processes and decision-making. I have studied regional and district economies throughout New Zealand, and roles of key sectors in the economy. I have undertaken a wide range of studies into housing and land demand, including demographic assessment, dwelling and location preferences, housing patterns, and ability and willingness to pay.
6. I have applied my capabilities for the assessment of effects in evidence to council-level hearings, and in evidence for the Environment Court, the High Court, and the Supreme Court, as well as the Auckland Unitary Plan Independent Hearings Panel, and EPA hearings.

## **CODE OF CONDUCT**

7. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of

that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

## CONTEXT

8. I have been retained by Weston Lea Limited (**Weston Lea**) to prepare of evidence on its application for land use and subdivision consent from the Hamilton City Council (**HCC** or **Council**) for the Amberfield development.
9. The focus of my statement is the HCC's requirement for sports park land relating to the housing capacity of the Amberfield development.

### *Situation*

10. A resource consent has been sought by Weston Lea to develop Amberfield subdivision within Hamilton City's Peacocke growth cell area. The Amberfield site is approximately 105 ha in land area, with a proposed residential yield of around 835 households.<sup>1</sup>
11. The total Peacocke growth cell area has an estimated yield of around 8,500 households.<sup>2</sup>
12. The Amberfield subdivision is located within the Stage 2 area of Peacocke where development is now anticipated within the current decade according to HCC's most recent long-term plan.
13. In relation to the subdivision consent, HCC are seeking a land contribution of 6.95ha within Amberfield, for the development of a new sports park. Council's section 42A Report identifies a total requirement of 24ha for sports parks in the Peacocke growth cell. A further land contribution of 13ha (a combined 20ha is being sought) for other sports parks is also being sought within the northern area of Peacocke. The intention is to develop sports fields within the parks.
14. I note that a lower bound sports park land requirement of 20ha can also be calculated from the HCC s42A report.
15. The two sports parks together are intended to meet growth needs, by serving the demand for sports fields from all future households across the entire

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<sup>1</sup> The residential yield has been advised by Weston Lea.

<sup>2</sup> The 2017 Future Proof Strategy, *Planning for Growth*, has a yield of 8,500. The earlier Hamilton City Council 2007 *Peacocke Structure Plan* has a yield of 7,500 households

Peacocke growth cell. The sports fields are intended to be part of the citywide network of sports parks.

16. HCC-commissioned technical land assessments have identified the two proposed sports parks' locations within the Peacocke growth cell as having suitable land characteristics to accommodate the sports fields. No other suitable locations were identified. The two potential sports park locations have been identified by HCC within the 2007 Peacocke Structure Plan and the Structure Plan chapter of the Operative District Plan (**ODP**). The proposed 6.95 ha indicates the land would be a "Community Park" and/or "Sportsfield and Facilities" asset, according to Council's Draft Open Space Provision Policy (**DOSPP**).

***Relevant Documents***

17. In preparing this evidence I have read the following documents:
  - (a) Covec, 2012 Cost Allocation Guidelines for Development Contributions, prepared for Hamilton City Council, 15 October 2012.
  - (b) Hamilton City Council, 2005 Parks and Gardens Activity Plan, Volume 1, November 2005.
  - (c) Hamilton City Council, 2005 Parks and Gardens Activity Management Plan, Volume 2, November 2005.
  - (d) Hamilton City Council, 2006 Reserves in Peacocke, DRAFT.
  - (e) Hamilton City Council, 2007 Peacocke Structure Plan, July 2007.
  - (f) Hamilton City Council, 2009 Operative Sports Parks Management Plan, September 2009.
  - (g) Hamilton City Council, 2013 Growth Funding Policy, 1 July 2013.
  - (h) Hamilton City Council, 2015 Long-Term Infrastructure Strategy 2015-2045, 2015-2025 10-Year Plan Volume 2.
  - (i) Hamilton City Council, 2016 Development Contributions Policy 2016/17, 30 June 2016.

- (j) Hamilton City Council, 2017 Operative District Plan, 21 September 2017.
- (k) Hamilton City Council, 2018 Open Space Provision Policy, Version 1, 26 June 2018.
- (l) Hamilton City Council, 2018 Development Contributions Policy 2018/19, 1 July 2018.
- (m) Hamilton City Council, 2018 Parks & Open Spaces Activity Management Plan 2018 – 28, Final Draft AMP, April 2018.
- (n) Hamilton City Council, 2019 Hamilton City Council Section 42A Report, March 2019.
- (o) Momentum Research and Evaluation Ltd, 2013 Hamilton City Winter Sports Fields: Capacity and Demand, prepared for Hamilton City Council, February 2013.
- (p) Sport New Zealand, 2012 Sport and Recreation in the Lives of Young New Zealanders, New Zealand Young People's Survey Series.
- (q) Xyst, 2018 Provision of Sports Parks within the Peacocke Structure Plan area, prepared for Hamilton City Council, Draft, 29 November 2018.

### **ASSESSMENT OF HCC SPORTS PARK REQUIREMENTS**

- 18. Market Economics Limited were commissioned by Weston Lea in 2018 to review the requirement for the requested land contribution for sports parks within Amberfield and the wider Peacocke growth cell area. I supervised the technical review of the sports park land area requirement calculated by HCC, and I have prepared this evidence on that basis.
- 19. The key aspects of the review included:
  - (a) Identifying the origin of the requested sports park land requirement within the Peacocke Structure Plan process, reviewing the HCC Peacocke Structure Plan documentation to determine the origins of the requirement for the sports parks land. This process sought

information on the size and location of the proposed sports park reserves within the Amberfield and the wider Peacocke area.

- (b) Assessing the HCC Development Contributions Policies to determine the reserve requirement according to DCs. Market Economics examined the proposed sports park reserves requirements set out within the HCC 2016/17 and 2018/19 Development Contributions Policies. This document and the supporting technical information (Covec, 2012) were examined to understand the basis for the requested land area for Amberfield.
  - (c) Assessing HCC's approach to establishing the reserves Level of Service (**LoS**) requirement. The Development Contributions Policy sets out that the reserves land requirement to meet future growth needs is based on a defined reserves LoS within Hamilton City. Further HCC documentation was reviewed to evaluate the technical methodology which is applied to establish the LoS.
20. A core aspect of the review process was to identify HCC's parks and reserves LoS as defined, relevant to the provision of sports fields areas. A main purpose of this was to be able to compare the proposed open space land areas within Amberfield and Peacocke with the current existing open space and sports parks levels of service within Hamilton City.
21. The above comparisons were used to determine:
- (a) How much land is required for the proposed sports parks to meet the growth needs of Amberfield residents; and.
  - (b) What level of population demand would the 6.95ha sports park proposed for Amberfield serve.
  - (c) The key findings from each part of the review are outlined in the following sections.

### ***Peacocke Structure Plan***

22. The HCC 2007 Peacocke Structure Plan states that "two major sports parks have been identified as being required to meet the current standard of

provision within the city” (p54, emphasis added). These parks have a combined land area of approximately 17ha within the Structure Plan.

23. The Structure Plan identifies an indicative location within the northern part of Peacocke to accommodate a 6ha reserve, and an indicative eastern location within Amberfield to accommodate an 11ha reserve (see Figure 26 of the Structure Plan, page 55). It states that “the location of the sports parks is driven by the need for large flat areas, and based on a general distribution across the structure plan area” (p48).
24. I note the differences in the land areas, as well as their corresponding locations, to the land areas more recently sought by HCC. The 2007 Structure Plan’s identification of 11ha within Amberfield compares to the 6.95ha currently sought within Amberfield; and the 6ha reserve in the northern location compares to the 13ha currently sought in the northern location.
25. The 2007 Structure Plan (p61) states that the cost of providing reserves will primarily be met through Council’s Development and Financial Contributions Policy as they are required to facilitate city growth.
26. The Hamilton Operative District Plan (**ODP**) also states the need for two major sports parks with their indicative locations similarly identified within Section 3 Structure Plans (see Figure 3.4a on page 3-10). The ODP does not make any reference to the required size of the reserves.
27. However, neither the 2007 Structure Plan nor the ODP provide any information to support or explain the identified need for the reserves. No technical information is provided either to identify the “current standard of provision within the city” (2007 Structure Plan, p54).

### ***Development Contributions Policies***

28. I have also examined the HCC Development Contributions (**DCs**) Policy to see whether standards and LoS for sports parks were defined there.
29. The Council’s DCs Policy should theoretically provide a strong systematic basis for the land contribution for the sports parks within Peacocke. As stated in the Peacocke Structure Plan, the sports parks are required to facilitate city growth and will therefore be funded through DCs.

30. I have reviewed the approach to the determination and collection of DCs within both the 2016/17 and 2018/19 DCs policies. These policies and their supporting material have been examined to identify a technical basis for the sports park land contribution.
31. The DC policies state that DCs can be charged for capital expenditure where demand is driven specifically by growth. The amount recovered must equal the capital expenditure less any other funding source (e.g. grants, subsidies, etc) received for the project, and cannot include any ongoing operational or maintenance costs. I understand from the policy that DCs cannot be charged for any share of the capital expenditure that would be meeting demand to maintain service levels across existing households (i.e. not growth households).
32. The DC policies themselves do not contain any further information on the basis for calculating the required DCs. There is no information to determine the level of infrastructure required to support growth.
33. Consequently, I have also examined the technical documents that inform the DC policies (the Covec 2012 Cost Allocations report). It sets out the key stages in calculating the DCs required from growth to be applied within the policy. From this, the key stages are to determine the existing level of service (LoS), and then what share of the project capital cost (less any funding from other sources) is related to providing this level of service across the expected household growth.
34. However, the DC policy documents do not specify the LoS information relating to sports parks.

***Peacocke Structure Plan and s42A Report Approach to LoS***

35. HCC has provided two documents that were prepared to identify the area of sports parks required in the Peacocke growth cell. These reports calculate the required area based on the existing LoS in Hamilton City.
36. One document was provided in draft form and was prepared in 2006 prior to the 2007 Peacocke Structure Plan. The second report (“the Xyst (2018) report”), also provided in draft form, was prepared by Xyst for HCC:

*“to assess the appropriate provision of land for the organised sport and recreation needs of the future community of the Peacocke Structure Plan area. This assessment was requested to inform development processes for subdivision, including the current ‘Amberfield’ subdivision application”* (Xyst, 2018: p1).

37. Both reports identify that the sports parks level of service is determined as a function of the number of sports fields available as a ratio of population. Specifically, the LoS is determined as the number of full-sized winter sports fields per 1,000 population. Each field equates to approximately 1ha, which means this ratio is often expressed as an area of fields per 1,000 population.
38. The use of sports fields area as the measure of the LoS is consistent with the demand calculations within HCC’s winter sports fields demand research, the HCC 2009 Sports Parks Operative Plan, and, as stated within the Xyst (2018) report, nationally established methodologies for calculating service demand (as set out within these reports). It is also consistent with the approach taken in HCC’s Section 42A report to identify the required demand across the full Peacocke growth cell.
39. The Xyst report states that a ratio of 2:1 for the area of sports parks to the area of sports fields should be applied to estimate the overall size of the sports parks to accommodate the sports fields LoS. This includes the buffer areas required around fields, and the provision of associated facilities and amenity for larger parks. The ratio represents the average ratio of sports park area to field areas for the New Zealand comparator cities to Hamilton.
40. Through applying that 2:1 ratio, the Xyst (2018) report expresses the LoS as a sports park area per 1,000 population. The earlier 2006 report expresses the LoS in terms of the number of fields required. It does not apply any further conversions to identify the total land area required to accommodate the fields.
41. This is consistent with the ratio applied within HCC’s s 42A report. The s 42A Report arrives at this ratio through the examination of a “relevant and recent example of land area requirement for field numbers” (Appendix I, p16) of Rototuna Sports Park.

42. I consider the above approach is an appropriate initial basis for determining the area of fields and sports park area required to meet the needs of future Amberfield and Peacocke households. I agree that the number of fields required is driven by the demand generated for sports fields use by Hamilton City households.
43. I recognise also that there is potential variation around the number of fields relative to the level of demand served, because the delivered LoS is influenced by the quality and type of fields where some fields (e.g. sand carpet fields with good drainage) can serve higher levels of demand through the capability to support a greater number of usage hours.
44. This is set out in the 2018 Hamilton City Parks and Open Space Activity Management Plan (AMP) which describes the sports fields LoS in terms of the total usage time capacity that is provided by sports fields. This is consistent with the approach described within the winter sports assessment research where the capacity on each field is largely a function of the type and quality of the field. The AMP correspondingly defines the required LoS in terms of the types of field (e.g. soil-based vs. sand carpet) and the level of investment (e.g. drainage system), and the share of fields that are maintained to acceptable standards. There is no measure, in the AMP, that relates the sports fields LoS to a quantity of land per unit of population. This is because different LoS can be achieved on equivalent sports fields land areas as a function of the investment in the fields. I address this further below.

#### ***Current Recreational Space LoS in Hamilton City***

45. I have also examined the existing amount of recreational space in Hamilton City.
46. The Xyst (2018) report found that Hamilton City contained 88.8 ha in sports fields in 2012, equating to 0.60 ha of sports fields per 1,000 people. In 2017, it identified 98.5 ha of sports fields, also equating to 0.60 ha per 1,000 people.
47. Through applying a 2:1 ratio of total sports park land area to fields area, the Xyst (2018) report identifies an existing LoS of 1.20 ha of sports parks area per 1,000 population in Hamilton City.

## **HAMILTON CITY COUNCIL CALCULATIONS OF RECREATIONAL SPACE REQUIREMENTS FOR AMBERFIELD AND PEACOCKE**

48. HCC's latest estimates of the recreational space requirements are set out in the HCC's s 42A report.
49. This states that Hamilton City currently contains 96 developed and bookable winter sports fields. It compares these to a citywide population of 161,000 to calculate an existing level of service of 0.6 fields per 1,000 population within Hamilton City. It similarly uses a 2:1 ratio of land to fields area when calculating the required sports park area for Peacocke.
50. The estimates apply the same approach as the Xyst (2018) study, and reach the same findings, for Peacocke in total, in terms of the LoS. However, the s 42A report does not state they are drawn directly from the Xyst study.
51. Using the above LoS, the Xyst (2018) report finds that 2.76ha of sports parks area is required to meet the needs of future residents within Amberfield. For the wider Peacocke area, it finds that 24.0ha is required (including the land requirement for Amberfield).
52. These calculations, within the Xyst (2018) report, are based off an assumed population of 2,300 residents within Amberfield and 20,000 residents within the Peacocke growth cell overall (i.e. consistent with the 2007 Peacocke Structure Plan). At an implied average household size of 2.75 persons within Amberfield, in my view this may represent an upper range of the population within Amberfield. The conversion of households to population within the remainder area of the Peacocke Structure Plan area (i.e. 17,700 population and 7,665 households) gives an average household size of 2.31 persons.
53. I note, as an alternative, that the evidence of Dr Small (reference paragraph 56) assumes an average household size of 2.51 residents in Amberfield. This would imply a population of around 2,100 residents within Amberfield. If this alternative future population of 2,100 residents were used, this would result in a sports park land requirement of 2.48ha to maintain existing LoS for future Amberfield residents.
54. HCC's section 42A report finds that 10 to 12 sports fields are required to uphold the existing LoS for future households across the full Peacocke growth

cell area. This is based off a projected population of 18,000 to 20,000 future residents. The report then applies a land area ratio of 2:1, to the 12 sports fields required for the upper population projection of 20,000 residents, to identify a total sports park land area requirement of 24ha.

55. I note that the HCC section 42A Report also implies a lower bound estimate of sports park land requirement for the Peacocke growth cell based off a population projection range of 18,000 to 20,000. It states that 10-12 fields are required (p16), with each field being 1ha, and a ratio of 2:1 land area being applied. If this were applied to the lower bound of 10 fields, then this would equal a sports park land requirement of 20ha.
56. The section 42A report states that a 7ha sports park would be a suitable provision in the Amberfield development within the Peacocke growth cell. It states that an additional sports park is required in the location identified within the Structure Plan within the northern part of Peacocke. The size of the northern sports park is not identified within the report.
57. The section 42A report does not identify the share of the sports park land area required to serve Amberfield future residents demand. It states that the two parks will serve the full Peacocke Structure Plan area.
58. I consider that a range of 2.48ha to 2.76ha land area to serve the future Amberfield population sports fields demand is consistent with the existing LoS within Hamilton City. The upper end of the range is the land area requirement identified within the Xyst (2018) report, and the lower end is calculated by applying the same LoS to the lower alternative future Amberfield population implied in Dr Small's evidence. The range is appropriate as an initial basis to inform the area required to maintain the LoS if fields are supplied at the same quality as the Hamilton City average.
59. However, in my view, it may form an upper estimate of the area required to provide the same level of sports field usage that is currently available from Hamilton City's existing sports fields areas. This is because of the potential to supply higher quality fields (e.g. with different types of surfaces and increased drainage) that would enable a greater number of usage hours.

60. I consider that the 24ha land area identified within the Xyst (2018) and HCC s42A reports to serve the total Peacocke area is also consistent with a provision of sports fields at the existing sports parks level of quality, and corresponds with the existing upper bound of the future population capacity of 20,000 residents. However, I note that if the future population is lower, then the required sports park area would also be correspondingly lower.

#### **DEMAND SERVED BY THE PROPOSED SPORTS PARK IN AMBERFIELD**

61. In this section, I have examined the population which the proposed 6.95 ha sports park for Amberfield would serve, drawing from the above LoS information.
62. The total sports park area required to serve the future Amberfield population and the total area served by the proposed sports park area are summarised in the following table. It shows a total required area of between 2.48ha and 2.76 ha.

Table: Sports Park Land Area Required in Amberfield and Level of Demand Served by Proposed Sports Park

<b>AMBERFIELD</b>	
Total Amberfield future population - Xyst (2018)	2,300
Sports Park LoS (Ha per 1,000 Popn) - HCC (2019) and Xyst (2018)	1.20
<b>Area required to serve future population at LoS rate (Ha)</b>	<b>2.76</b>
Proposed sports park area (Ha)	6.95
Amberfield population served by proposed sports park at LoS	2,300
Additional population served by proposed sports park at LoS	3,496
<b>Total population served by proposed sports park at LoS</b>	<b>5,796</b>
Alternative Amberfield future population	2,100
Sports Park LoS (Ha per 1,000 Popn) - HCC (2019) and Xyst (2018)	1.20
<b>Area required to serve future population at LoS rate (Ha)</b>	<b>2.48</b>
Proposed sports park area (Ha)	6.95
Amberfield population served by proposed sports park at LoS	2,100
Additional population served by proposed sports park at LoS	3,696
<b>Total population served by proposed sports park at LoS</b>	<b>5,796</b>

63. The above LoS (of 1.2ha of sports park area per 1,000 population) demonstrates that the proposed 6.95 ha sports park within Amberfield would serve an estimated 5,796 population. I consider that this means it would serve

an additional 3,496 (3,500 rounded) to 3,696 (3,700 rounded) people outside of the Amberfield subdivision.

64. I consider that the LoS (of 0.60 fields per 1,000 population and 1.2ha of sports park per 1,000 population) identified within the Xyst (2018) and HCC Section 42A reports represent the status quo sports park supply scenario to maintain existing LoS across future households.
65. Under this scenario, sports fields (and their associated land requirements) would be supplied at the same rate and quality as the existing sports fields across Hamilton City.
66. I understand that the HCC (2018) Open Space Provision Policy sets out a minimum land area requirement of 7ha (4ha of sports park area and 3ha of associated community park area) for parks within greenfield development areas providing sports fields. The minimum size has been established to achieve efficiencies in parks provision through the associated parks facilities (e.g. changing rooms and toilets) being able to serve a larger number of fields rather than having facilities replicated across multiple locations with smaller parks.

### ***Potential to Increase Sports Field LoS***

67. The 2018 Parks and Open Spaces AMP states that  
*“the quality of sports fields [in Hamilton City] is substandard and failing to meet the expectations of users”*(HCC, 2018: p14).
68. It finds that the LoS can be increased through further investment in the quality of existing fields as higher quality fields (such as those with better drainage and surfaces) can support a higher number of usage hours. The LoS is partly defined in relation to the type of field and level of drainage.
69. Based on the AMP description of the current status of Hamilton City sports fields, I consider that the existing LoS (of 0.60 fields per 1,000 population) identified within both the Xyst (2018) and the HCC Section 42A reports is therefore likely to represent a higher bound estimate of the sports fields area required to maintain the existing LoS across future households. This is because, under a different scenario, sports fields can be supplied at a higher

quality than the existing Hamilton City average. This means that an equivalent level of demand (as expressed in terms of the hours of usage) can be met through fewer fields.

70. I consider that a further alternative scenario for maintaining the existing LoS across future households could also potentially occur through developing additional sports fields within Hamilton City's existing sports parks.
71. The Xyst (2018) report identified a total land area of 498ha across Hamilton City sports parks in 2017. It identified 98.5ha of land as developed into sports fields. If it is assumed that these fields have a total space requirement of 197ha (through applying the 2:1 ratio of park area to field area), then this indicates there may be up to around 300ha of sports park area within Hamilton City that is not developed to accommodate sports fields.
72. I consider it is possible that a share of the additional sports park area could potentially be developed to contain additional sports fields. However, I do not have information on the suitability of these land areas for sports field development, or their suitability (in terms of location and size) to serve future demand within Peacocke. I acknowledge that part of the suitability is determined by the ability of multiple sports fields to co-locate due to the efficiencies achieved in associated facilities provision.
73. I note that the winter sports demand and capacity report, that informed the Xyst (2018) report, found that in 2012 Hamilton City had a number of other undeveloped sports parks and other undeveloped land areas that could potentially be developed to contain sports fields. The report also found that capacity for usage could be increased on existing sports fields through further development of existing fields, such as a move to sand surfaces.

## **CONCLUSION**

74. In summary, I conclude that:
  - (a) The demand served by sports fields within Hamilton City forms the relevant consideration for benchmarking the proposed sports park land areas in Peacocke in relation to the Hamilton City existing LoS.
  - (b) The existing sports fields LoS has been set out by HCC as 0.6ha of

sports fields area per 1,000 population and a further 0.6ha of land area per 1,000 population, equating to a combined 1.2ha of sports park area per 1,000 population.

- (c) I consider this approach forms an appropriate initial basis for determining the sports park area required to maintain the existing LoS for the future Amberfield and Peacocke population.
- (d) Using the defined LoS, 2.48ha to 2.76ha of sports park area is required to maintain the existing Hamilton City LoS across the future Amberfield population.
- (e) Using this LoS, the 6.95ha sports park proposed for Amberfield would serve a population of 5,800. This would include a projected Amberfield population of 2,100 to 2,300, and a further 3,500 to 3,700 population beyond the Amberfield subdivision.
- (f) If the same rates of LoS were applied to Peacocke overall, at an upper estimate of 20,000 future population, then 24ha of sports park area would be required. However, if the Peacocke future population is lower, then the required sports park area will be correspondingly lower.
- (g) I consider that the 1.2ha of sports park per 1,000 population LoS identified by HCC is likely to represent a higher bound estimate of the sports park area required to meet the equivalent rate of demand within Peacocke. This is because fields could potentially be supplied at a higher quality (than the existing identified low quality within Hamilton City) and therefore support the same number of usage hours with fewer fields.

- (h) A high share of Hamilton City's existing sports parks land area is not currently developed as sports fields. I consider it is possible that a share of the additional sports park area could potentially be developed to contain additional sports fields.

**Dated this 12<sup>th</sup> day of April 2019**

A handwritten signature in blue ink, appearing to be 'JDM', with a horizontal line extending to the right from the end of the signature.

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**James Douglas Marshall Fairgray**