

The D1NZ National Drifting Championship Series

Once a Year Drifting Event at Pukekohe Park Raceway



Photo courtesy D1NZ website

Assessment of Environmental Effects related to an Application to Auckland Council for a Discharges into Air Permit

prepared by Kevin Rolfe, Director, Kevin Rolfe Consulting Limited

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Kevin Rolfe Consulting Limited
Chemical Engineer and Environmental Management Specialist
P O Box 56-164, Dominion Road, Auckland 1446
ph.: + 64 21 687276 krolfe@xtra.co.nz

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EXECUTIVE SUMMARY

The D1NZ Proposal is to hold one Drifting event per year at the Pukekohe Raceway. The first event is planned for Saturday, 23rd and Sunday, 24th of May 2015, and would be the final of the D1NZ National Drifting Championship Series. There has been a long history of motor sport carried out at the Pukekohe Raceway. The first Drifting event in New Zealand was held there in 2002, and regular events subsequently. These were initially on several days a year reducing, with the use of other tracks, to a one two-day event per year. After a decade of satisfactory operation, in 2011 Pukekohe Raceway was served an Abatement Notice by Auckland Council for the production of smoke that crossed the boundary on Station Road. This followed a complaint from a resident who no longer lives in the area. No Drifting event has been held at the Pukekohe Raceway since.

It is estimated that more than 10,000 motorsport fans would attend the event, and the Series is broadcast live on TV3 Motorsport, and via satellite to more than 48 countries. Positive effects of the Proposal include the enjoyment of the event by both competitors and spectators and the carrying out of Drifting in a safe, controlled environment rather than on public roads. A potential Adverse effect of the Proposal is exposure to smoke and odour by non-sympathetic neighbours of the event causing a decrease in amenity values. The likelihood of that is best assessed by considering past experience, at Pukekohe Raceway and elsewhere. A relevant example is the monitoring done by two staff of the Bay of Plenty Regional Council of a Drifting event in a carpark at the Baypark Entertainment Complex in Mt Maunganui, 19-20 January 2013. The Bay of Plenty Air Plan Rules on smoke and odour are similar to those of Auckland Council. It was found that this Drifting event did not breach those Rules.

This Assessment concludes:

1. Drifting is a significant motorsport event and the Pukekohe Raceway is an appropriate location for it to be carried out.
2. The Proposal, involving one two-day event per year, is modest and, based on previous experience at the Pukekohe Raceway and elsewhere, combined with the mitigation measures and the extensive consultation that has taken place, the potential effects on amenity values would be less than minor.
3. The positive effects of the Proposal far outweigh the potential negative effects.

This Assessment recommends:

- a) A Discharges into Air Permit for the Proposal, subject to any conditions, be issued non-notified.
- b) The Abatement Notice be uplifted.

1. Introduction

Drifting is a motorsport where drivers adopt a driving technique of intentionally over-steering their vehicle, causing loss of traction in the back wheels. Hence the vehicle goes into a tail slide (a “Drift”), while at all times the driver apparently maintains control of the vehicle from the entry to the exit of a corner. A vehicle is drifting when the rear slip angle is greater than the front slip angle, to such an extent that often the front wheels are pointing in the opposite direction to the direction the vehicle is turning.

A competition usually involves two vehicles in tandem at a time. The requirements on a driver are to hold the Drift through a set of corners, while maintaining the closest possible distance between their vehicle and that of their opponent. The idea is to get as much angle during the drift as possible, holding as much speed and smoothness as can be achieved and showing additional personal style and flair (the “show factor”), while maintaining the closest distances (“clipping points”) to the vehicle of the opponent and to a wall, etc. Drifting is judged on how well the driver can perform these skills, involving speed, angle, line, clipping points, and the ability to match or attack the other driver’s drifting line.

Apparently, Drifting is the fastest growing motorsport today¹. The intensely addictive combination of speed, smoke and sideways action is the primary reason for this. Drifting requires drivers to maintain control of their vehicles beyond the limits of traction in a way traditional Motorsport never imagined possible. This form of motorsport has been found to be hugely addictive to not only spectators but drivers as well, because it is aggressive and, being a judged interactive sport (in that the crowd’s reaction is likely to influence the judging), it offers a level of excitement that straight-line racing rarely can. According to a recent New Zealand Herald article² it is especially popular with Generation Y.

Drift vehicles are usually light to moderate weight rear-wheel drive cars. Sometimes all-wheel drive rally cars are converted to rear-wheel drive. With a prevalence of Ford and Holden cars used for sedan car racing in New Zealand (and Australia) such vehicles also feature in Drifting. Apparently the sport began in Japan in the 1970s, and spread internationally following the release in 1987 of a seven minute video³ of a legendary Japanese driver called Keiichi Tsuchiya. In its purest form, Drifting even uses Japanese terms such as **Tanso** (solo run), used in qualifying sessions to determine a final group of 16, and **Tsuiso** (chasing race), for the tandem passes. There are a several dedicated Drifting websites, such as in the United States⁴, Greece⁵, Australia⁶, and New Zealand⁷.

¹ <https://www.youtube.com/watch?v=nUi6fGF19cl>

² http://www.nzherald.co.nz/sport/news/article.cfm?c_id=4&objectid=11299988

³ <http://www.youtube.com/watch?v=OVyxHVhNNGY>

⁴ <http://www.drift-allstars.com>

⁵ <http://www.driftclub.gr>

⁶ <http://www.australiandriftinggp.com>

⁷ <http://www.d1nz.com>

An inevitable consequence of Drifting is discharges of smoke and odour, from the car tires and possibly also the brakes. This can produce nuisance effects. That is, using the terminology of the Resource Management Act 1991⁸, the discharges can adversely effect amenity values. Amenity values are *“those natural or physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes”*⁹.

Hence to protect the amenity values of potentially non-sympathetic neighbours, it is essential that the Drifting events be held in locations with sufficient separation distances to sensitive land users. This is the primary topic of this Assessment of Environmental Effects. This will be done, largely, by referring to past experiences with Drifting at Pukekohe and elsewhere.

⁸ Resource Management Act 1991, Public Act 1991, No. 69

⁹ Ibid, Section 2, Interpretation

2. The Proposal and its Location

The Proposal by D1NZ is to hold one Drifting event per year at the Pukekohe Park Raceway (henceforth abbreviated to Pukekohe Raceway). The first event is planned for Saturday, 23rd and Sunday, 24th of May 2015, and it would be the final of the D1NZ National Drifting Championship Series.

The location of the Pukekohe Raceway is shown in Figure 1. It is separate track around the outside of the Pukekohe Racecourse, and it is located south-east of the township of Pukekohe (between Pukekohe and Buckland). Primary access to both the Pukekohe Racecourse and the Pukekohe Raceway is provided from Manukau Road/Buckland Road to the west and the south-west. The track is bounded on the north-east side by Station Road. There is an entity called Pukekohe Park Limited, and the horse racing is carried out by the Counties Racing Club.



Figure 1: Location of the Pukekohe Raceway

There has been a long history of motor sport carried out at the Pukekohe Raceway. The first Drifting event in New Zealand was held there in 2002, and regular events subsequently. These were initially on several days a year reducing, with the use of other tracks, to a one two-day event per year.

Other tracks at which D1NZ operate Drifting events include Ruapuna Raceway, Taupo Motorsport Park, Manfield Raceway, Hampton Downs, Baypark Stadium, a custom circuit in Whangarei, and at Mt Smart (where the photo on the front cover was taken). There are special features of the Pukekohe Raceway that are not available at the other tracks. It is, apparently¹⁰, the only track in the world that allows drift cars to enter a corner at over 210 kph sideways.

After a decade of satisfactory operation, in 2011 Pukekohe Raceway was served an Abatement Notice¹¹ by Auckland Council for the production of smoke that crossed the boundary on Station Road. This followed a complaint from a resident who, apparently¹², no longer lives in the area. No Drifting event has been held at the Pukekohe Raceway since. At the time of previous events, D1NZ had had environmental effects reports prepared, and these showed no occurrences of offensive Drifting smoke.

Unlike straight-line racing, Drifting only takes place on a small part of the circuit. That is, judging only takes place on a few linking corners that provide good viewing, and opportunities for Drifting. The rest of the circuit is essentially irrelevant, except that it allows the drivers to control the temperature of the tires and to set the car up for the first judged corner.

In the case of the Pukekohe Raceway only two corners are used for Drifting. As shown in Figure 2, they are at the beginning and the end of the home straight of the track. Figures 3, 4, and 5 show, respectively, the first corner of the Drifting (under and beyond the track bridge), the home straight of the Pukekohe Raceway, and the second corner of the Drifting (commencing at the Jennian Homes sign). Drifting should be complete by the end of Castrol Corner¹³. The view of the home straight is taken from the main Grandstand.

Based on past experience, it is estimated¹⁴ that more than 10,000 motorsport fans would attend the event. The D1NZ National Drifting Championship Series is broadcast live on TV3 Motorsport, streamed live to more than 48 countries, and with a post event broadcast to Australia and America.

¹⁰ Personal communication with Brendon White, Director, The D1NZ National Drifting Championship Series, 13 November 2014

¹¹ A notice served under section 322 of the Resource Management Act 1991, presumably in relation to section 322(1)(a)(ii), regarding "in the opinion of an enforcement officer is or is likely to be noxious, dangerous, offensive to such an extent that it has or is likely to have an adverse effect on the environment"

¹² Personal communication with Brendon White, Director, The D1NZ National Drifting Championship Series, 13 November 2014

¹³ Ibid

¹⁴ Ibid

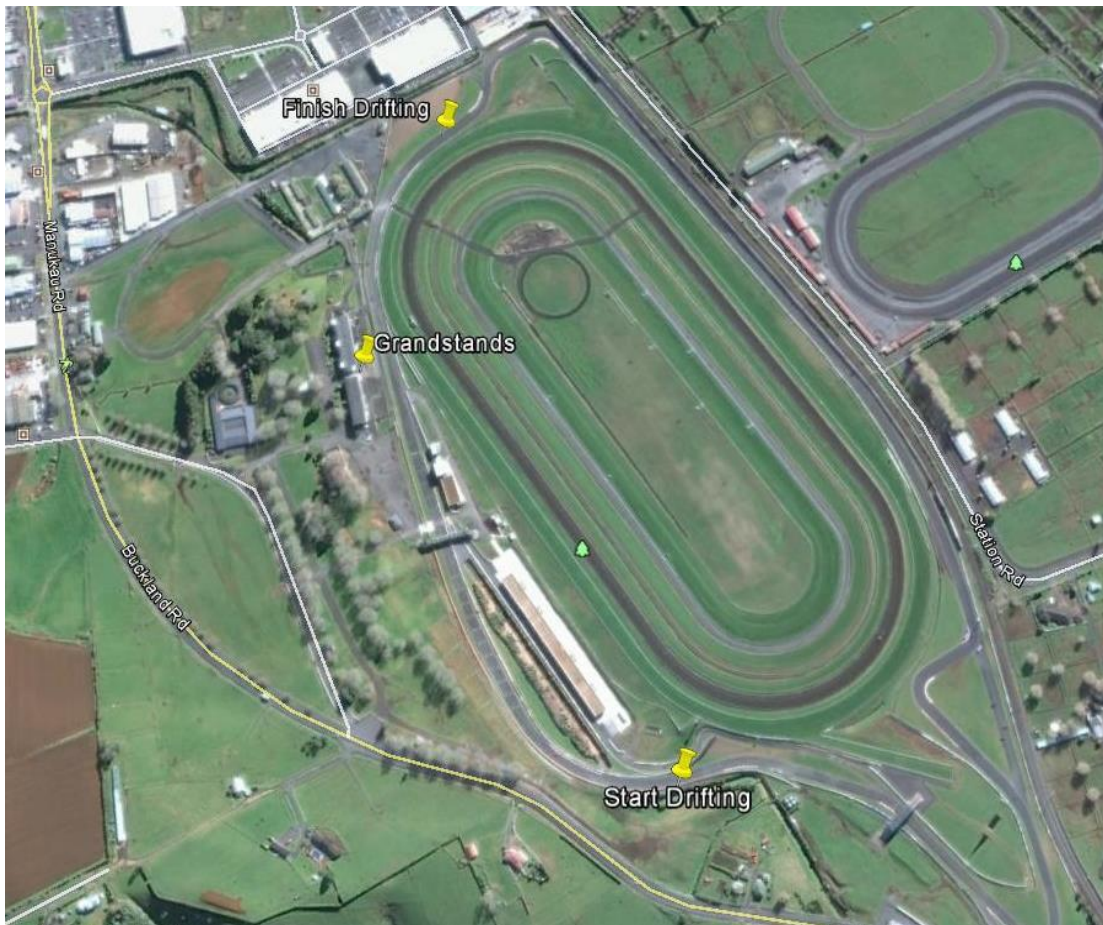


Figure 2: The Extent of the Drifting



Figure 3: First Corner of the Drifting (beyond bridge)



Figure 4: The Home Straight of the Pukekohe Raceway



Figure 5: Second Corner of the Drifting

3. Statutory Requirements

The relevant statutory documents are the Auckland Regional Council Regional Plan: Air, Land and Water (ALW Plan)¹⁵ and the Proposed Auckland Unitary Plan (PAUP).

Rule 4.5.1 (General Permitted Activity Rule) of the ALW Plan states, inter alia:

Unless provided for otherwise in this plan, activities that discharge contaminants into air are Permitted Activities, subject to the following conditions:

- (a) That beyond the boundary of the premises where the activity is being undertaken there shall be no noxious, dangerous, offensive or objectionable odour, dust, particulate, smoke or ash; and*
- (b) That there shall be no noxious, dangerous, offensive or objectionable visible emissions; and*
- (c)*

Relevant staff of the Auckland Council consider¹⁶ that the Proposal may not comply with those Permitted Activity conditions, making it a Discretionary Activity. Hence, pursuant to Rule 4.5.2 (General Discretionary Activity Rule) of the ALW Plan, an application for a Discharges into Air Permit is required.

The PAUP¹⁷ has, inter alia, under Part 3: Regional and District Rules, Chapter H: Auckland-wide rules, 4. Natural resources, Air Quality rule 3.1.1 (General Controls):

The following controls apply to all permitted activities that discharge contaminants to air except from mobile sources.

- 1. The discharge must not contain contaminants that cause, or are likely to cause, adverse effects on human health, property or the environment beyond the boundary of the premises where the activity takes place.*
- 2. The discharge must not cause noxious, dangerous, offensive or objectionable odour, dust, particulate, smoke or ash beyond the boundary of the premises where the activity takes place.*
- 3. There must be no, dangerous, offensive or objectionable visible emissions.*
- 4.*

¹⁵ Relevant parts of the Auckland Regional Plan: Air, Land and Water became operative on the 21 October 2010.

¹⁶ Minutes of a Meeting between D1NZ and Auckland Council, at the Pukekohe Service Centre, 22 October 2014, prepared by Richard Gard'ner, Regulatory Planning Coordinator: Land Use

¹⁷ The Proposed Auckland Unitary Plan is currently the subject of hearings by an Independent Panel, Chaired by Environment Court Judge David Kirkpatrick. Rules related to discharges to air already apply.

Again, relevant staff of the Auckland Council consider¹⁸ that the Proposal may not comply with those Permitted Activity controls, making it a Discretionary Activity. Hence, again, an application for a Discharges into Air Permit is required. It is noted that the Rule is considered to be relevant even though the wording includes “*except from motor vehicles*”.

In summary, the Proposal is considered by Auckland Council as a Discretionary Activity under both the ALW Plan and the PAUP, requiring an application for a Discharges into Air Permit. An application for this Permit is required to be accompanied by an Assessment of Environmental Effects (this document). Auckland Council staff has indicated that if a Permit was granted, and conditions of that consent were adhered to, then the Abatement Notice could be uplifted.

¹⁸ Minutes of a Meeting between D1NZ and Auckland Council, at the Pukekohe Service Centre, 22 October 2014, prepared by Richard Gard’ner, Regulatory Planning Coordinator: Land Use

4. Sensitivity of the Receiving Environment

The Pukekohe Raceway has been, and still is, used for a variety of forms of motorsport, including Formula One level racing cars, V8 super sedans, motor cycles, etc., etc. In a recent NZ Herald article¹⁹, advertising three types of motor car racing held over the weekend of 29-30 November 2014, it is referred to as the “*grand old lady of New Zealand motor racing tracks*”. Drifting was held at the Pukekohe Raceway for a decade. It is considered²⁰ an ideal track for that.

The closest neighbours to Pukekohe Raceway, almost adjoining the north-west boundary of the Raceway, is a shopping complex of various commercial premises, including a supermarket and a major consumer electronics and appliances retailer. The two, seemingly quite different, land users coexist without difficulties, as does the Counties Racing Club horse racing (when Pukekohe Park is used for that purpose).

The closest residential properties, associated with small farming units, are to the north-east of the track, about 150 metres from what is called Castrol corner. Figure 6 is a wind rose from the nearby Pukekohe meteorological station. It shows the prevailing winds are from the west, west-south-west, and west-north-west. There is a private school due east of the first corner of the proposed Drifting, but that is about 1,000 metres away.

Winds toward the near neighbours, that is those from the south-west occur about 7% of the time, whereas winds from the south-south-west, south, south-south-east, and south-east are rare. The percentage of time it is calm, which is also usually important for an assessment of potential air quality effects for near neighbours, is also small (about 2%).

In summary, the sensitivity of the receiving environment is one of low to moderate sensitivity.

¹⁹ http://www.nzherald.co.nz/motorsport/news/article.cfm?c_id=66&objectid=11366339&ref=rss

²⁰ Personal communication with Brendon White, Director, The D1NZ National Drifting Championship Series, 13 November 2014

CALMET.DAT: Interpolated to [(I,J)=(40.500, 40.500)]][(X,Y)km=(324.500, 5875.500) in MODEL Projection]

Height = 10.00 m; [Dec 30, 2009 - 2:00:00 AM to Dec 31, 2010 - 11:00:00 PM (UTC+1200)]

Annual(Jan to Dec): Total Periods = 8806; Valid Periods = 8806 (100%); Calm Wind Periods = 160

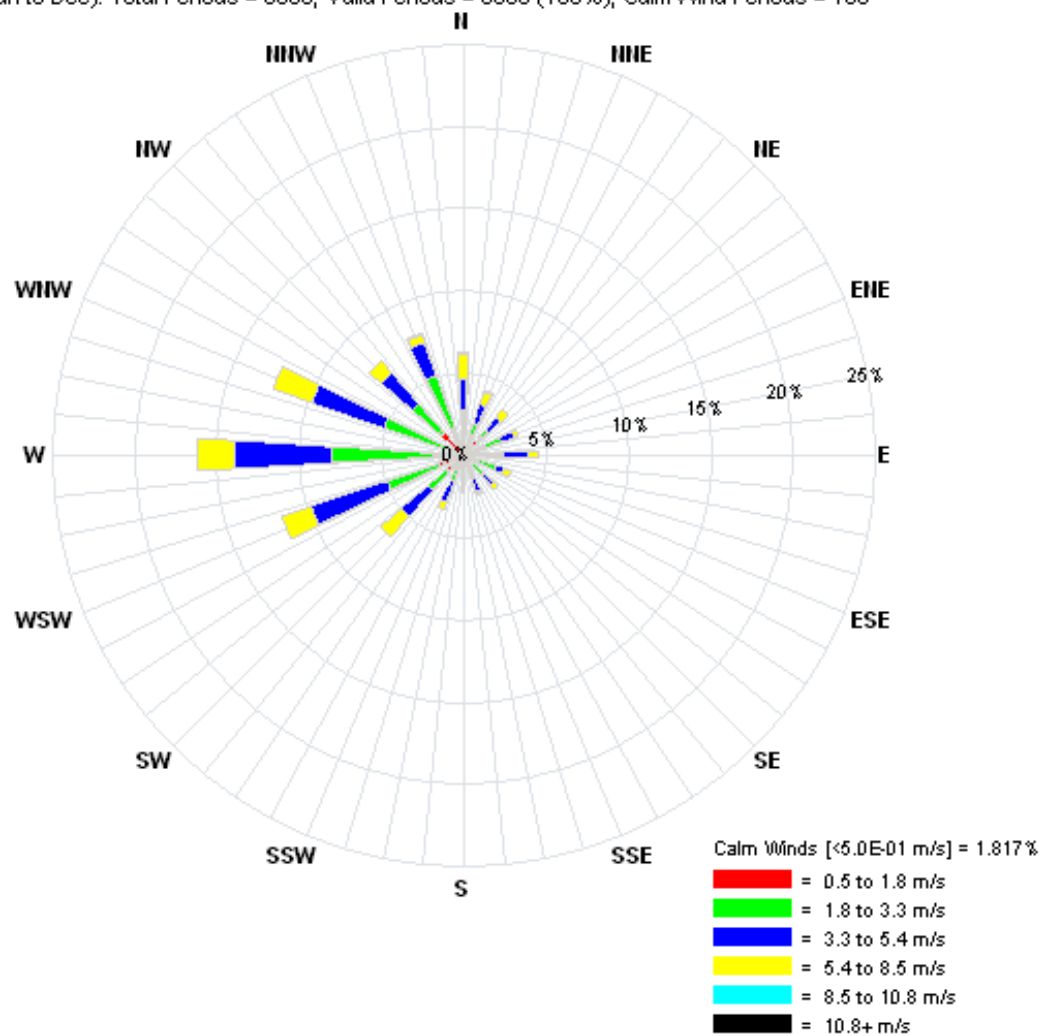


Figure 6: Wind Rose from Pukekohe Meteorological Station

5. Assessment of Effects of Proposal

The Resource Management Act 1991²¹ has a specific section, Section 3, giving the Meaning of effect, viz.:

In this Act, unless the context otherwise require, the term effect includes –

- (a) any positive or adverse effect; and*
- (b) any temporary or permanent effect; and*
- (c) any past, present, or future effect; and*
- (d) any cumulative effect which arises over time or in combination with other effects – regardless of the scale, intensity, duration, or frequency of the effect, and also includes –*
- (e) any potential effect of high probability; and*
- (f) any potential effect of low probability which has a high potential impact.*

Applying relevant parts of this definition to this Proposal, there are Positive effects, a potential Adverse effect, and the effects are Temporary. Importantly, there are no Permanent effects, no Cumulative effects, and neither any Potential effect of high probability nor any Potential effect of low probability which has a high potential impact. The frequency of the Proposal, a two-day, once a year event, means all effects are Temporary.

Positive effects of the Proposal include the enjoyment of the event by both competitors and spectators and the carrying out of Drifting in a safe, controlled environment rather than on public roads. A potential Adverse effect of the Proposal is exposure to smoke and odour by non-sympathetic neighbours of the event causing a decrease in amenity values. The likelihood of that is best assessed by considering past experience.

A relevant example is the monitoring done by two staff of the Bay of Plenty Regional Council of a Drifting event in a carpark at the Baypark Entertainment Complex in Mt Maunganui, 19-20 January 2013²². The Bay of Plenty Air Plan Rules on smoke and odour are similar to those of Auckland Council. It was found that this Drifting event did not breach those Rules. A Drifting event held at Mt Smart in Auckland on 7 November 2014 apparently²³ took place without any complaints. There was a Drifting event in downtown Auckland on Saturday, 6th of December 2014. Also there is the decade long previous experience at the Pukekohe Raceway. Based on those considerations, the potential effects of the Proposal on amenity values would be less than minor.

Decision-making under the Resource Management Act requires a broad judgement of the relative seriousness of the effects. It is not a 'numbers game' (that is, the ca. 10,000 attendees are not compared with the limited number of neighbours), rather the net effect of the Proposal is assessed. It is clear that the positive effects of the Proposal far outweigh the potential negative effects.

²¹ Resource Management Act 1991 (1991 No 69), as amended on 7 July 1993 by section 3 of the Resource Management Amendment Act 1993 (1993 No 65)

²² Monitoring Report: Bay Park Speedway National Drifting Event, 20 January 2013, prepared by John Morris, Senior Pollution Prevention Officer, Bay of Plenty Regional Council

²³ Personal communication with Brendon White, Director, The D1NZ National Drifting Championship Series, 13 November 2014

6. Mitigation Measures

D1NZ initially proposed²⁴ to residents during consultation that the two-day event would be held on a Friday and Saturday. However it was discovered that most were not concerned about the more preferred (for crowd numbers) of Saturday and Sunday. Hence that offered mitigation measure has been withdrawn and the dates of Saturday, 23rd and Sunday, 24th of May 2015 are now proposed for the first event, and with Saturday and Sunday in subsequent years.

Mitigation measures²⁵ proposed include the following:

1. Limit the extent of the Drifting to that part of the Raceway discussed in an earlier section of this Assessment, the first corner of which is the furthestmost point from potentially affected persons.
2. Stage the cars further apart to reduce the quantity of smoke at any time.
3. Limit the number of Drifts coming out of the second corner (involving the full use of Castrol Corner) from the previous three to one.
4. Enforce a strict “No Victory Burnouts” policy.
5. Encourage Auckland Council staff to attend the first event and monitor it, similar to what two staff of the Bay of Plenty Regional Council did in 2013²⁶.

²⁴ D1NZ Drifting at Pukekohe Park Raceway 2015 and Onwards: Review and Mitigation of Drifting Pukekohe – One time Yearly, The D1NZ National Drifting Championship Series, undated (circa. 2013)

²⁵ Ibid

²⁶ Monitoring Report: Bay Park Speedway National Drifting Event, 20 January 2013, prepared by John Morris, Senior Pollution Prevention Officer, Bay of Plenty Regional Council

7. Consultation Undertaken

The Resource Management Act encourages consultation between the applicant and persons potentially affected by the Proposal. Indeed, section 104(3)(a)(ii) of the Act²⁷ directs that a consent authority must not have regard to any effect on a person who has given written approval to an application when considering that application. A considerable amount of consultation has taken place for this application, and this is summarised in Figure 7.

The almost adjoining shopping complex of various commercial premises, including a supermarket and a major consumer electronics and appliances retailer, have all signed off, as have the closest residential properties. Only two persons within a radius of 500 metres of the northern side of the Raceway have not signed off. These two are the complainant, who now no longer lives in the area, and his neighbour. Figure 8 shows the previous location of the complainant. The distance between the two pins is about 270 metres. The neighbour of the complainant is indicated in red in Figure 7, and is located about 380 metres from the Raceway.



Figure 7: Persons Potentially Affected

²⁷ Resource Management Act 1991 (1991 No 69), as amended on 1 August 2003 by section 4 of the Resource Management Amendment Act 2003 (2003 No 23)



Figure 8: Previous Location of the Complainant opposed to the Proposal

The applicant, D1NZ, has had an on-line petition regarding bringing Drifting back to Pukekohe Raceway. Apparently²⁸, the petition has 3,800 recordings in support and 1,315 signatures. The applicant has also consulted with the 10 Iwi in the area of the Franklin Local Board – Nga Tai ki Tamaki, Ngati Tamaoho, Ngati Te Ata Waiohua, Te Akitai Waiohua, Ngati Paoa, Ngati Whanaunga, Ngati Maru, Ngati Tamatera, Te Patukirikiri. To date, positive responses have been received from two of those Iwi and responses from the other eight are awaited.

²⁸ D1NZ Drifting at Pukekohe Park Raceway 2015 and Onwards: Review and Mitigation of Drifting Pukekohe – One time Yearly, The D1NZ National Drifting Championship Series, undated (circa. 2013)

8. Conclusions and Recommendations

This Assessment concludes:

1. Drifting is a significant motorsport event and the Pukehohe Raceway is an appropriate location for it to be carried out.
2. The Proposal, involving one two-day event per year, is modest and, based on previous experience at the Pukekohe Raceway and elsewhere, combined with the mitigation measures and the extensive consultation that has taken place, the potential effects on amenity values would be less than minor.
3. The positive effects of the Proposal far outweigh the potential negative effects.

This Assessment recommends:

- a) A Discharges into Air Permit for the Proposal, subject to any conditions, be issued non-notified.
- b) The Abatement Notice be uplifted.