



**STATEMENT OF NON-EXPERT EVIDENCE**  
**BY RICHARD GLADWELL, SAIL WORLD NZ LTD**

**Introduction**

1. My full name is Richard John Gladwell. I live at 19b Wicklow Road, Narrow Neck. I am a submitter on the applications for resource consents lodged by Panuku Development Auckland for the necessary infrastructure and related activities associated with holding the America's Cup in Auckland and am a s.274 party to these proceedings.
2. My submission number is 51.
3. My occupation is Director of Sail World NZ Ltd, the owner of the NZ territorial website of the Sail-World.com news network with seven dedicated and unique sail racing news websites including New Zealand, Australia, Hong Kong, United States, Canada, Great Britain and Europe. Sail-World.com is the largest sailing news network in the world and is hosted in Great Britain.

My operational role since 2005, is that of a photo-journalist and website editor, covering major sailing events and stories specialising as the creator of unique content (written, still images, video and audio) usually covering America's Cup, Volvo Ocean Race, the Olympics and a wide range of other aspects of the sport, professional sailing and the marine industry. Most of my contacts are with international sources and my content is published internationally across the Sail-World sites and network as well as sailing social media outlets. I attended and covered the 33<sup>rd</sup>, 34<sup>th</sup> and 35<sup>th</sup> America's Cups and the 2008, 2012 and 2016 Olympic Regattas.

I have been a freelance sailing journalist since 1983. I have been full time on Sail-World for the past 18 months, previously in addition to my Sail-World role, I had a parallel career spanning 40 years in the IT industry in the area of operations, marketing, sales and consulting and recruitment.

The America's Cup is Sail-World's most followed topic and generates a substantial readership increase during a Match or with significant stories/content in the two or more year build up period to a Match. Most of this readership is internationally based and probably only 20% from New Zealand. In the 35<sup>th</sup> America's Cup cycle the highest-ranking story on Sail-World drew over 60,000 readers – probably 90% from outside New Zealand. Our biggest readership for a story so far in the 36<sup>th</sup> America's Cup has attracted approximately 26,000 reads of which just 12.6% came from New Zealand. Many of Sail-World's advertisers have a significant commercial interest in the America's Cup that is held in Auckland.

It is clearly in our and New Zealand's best interests that the 36<sup>th</sup> and subsequent America's Cups staged in Auckland are as successful as they can be. A key part in this success is constructing a venue that will show the America's Cup Regatta and New Zealand at its finest.

4. My submission arises from:
  - a. Concerns about the need to make the America's Cup as successful as possible and that Auckland retains a long-term marine event hosting capability beyond the America's Cup, without selling the space covered by this Application for other uses and development.
  - b. Concerns about Security of the dispersed site in the Application, and the issues this poses for accredited media in particular.
  - c. Concerns about the lack of emphasis on use of public transport for fans to attend the America's Cup Village.
  - d. Concerns that the Application is being only considered in the light of an America's Cup use when other sailing events need a waterfront venue, which is not incompatible with public use.
  - e. Restrictions on the construction and appearance of team base facilities that will result in bases that are inferior to those constructed in 2007 and 2017 America's Cups.
5. I have an interest in and/or knowledge relevant to the Application from 35 years involvement in reporting and following the America's Cup.

My relevant summarised experience and qualifications are as follows:

- a. Diploma of Management (5yrs part-time)– Auckland Technical Institute
- b. ISAF/World Sailing – International Judge (20 years) International. Umpire (10 years), International Jury member at many World Championships.
- c. Competitive sailor competing at international regattas and world championships 1973-1985 in international dinghy and keelboats (in shore and offshore racing).
- d. Worked as part of a consulting team for Morgan and Banks management services division on opportunities arising from an America's Cup hosting in Auckland. (1988).
- e. Director/Board member of Yachting New Zealand for eight years (2004-2012).
- f. Consultant to Television NZ (1991-92) for the development of online, real-time graphics application in conjunction with Animation Research Ltd for use in 1992 America's Cup coverage and since developed into the preeminent application for Sailing and other sports by ARL.
- g. One of five promoters of the Pacific Challenge Ltd (1994) public float. Advised on America's Cup and sailing/race management issues and undertook the rights valuation in the event of an America's Cup win. The float was not successful but the project continued on a different financial basis to become Tag Heuer Challenge contesting the 1995 America's Cup and progressing to the Semi-Finals.
- h. Member of the organising committee for eight world championships held in NZ for International and Olympic classes (1977 – 2008).
- i. As a journalist (print and online) have covered every America's Cup since 1983 including the two to four year build up period as well as the Match. Attended the 2000, 2003, 2010, 2013 and 2017 Americas Cup

as accredited media and the last three also as an accredited photographer. Attended the 2008, 2012 and 2016 Olympic Regattas as a journalist and accredited photographer (EPS).

- j. Invited to become a member of the selection panel to nominate inductees for the America's Cup Hall of Fame (2013). The appointment is for life and is for people with internationally recognised expertise in the America's Cup. There are two other NZ resident selection panel members Peter Montgomery and Hamish Ross.
- k. As an author wrote "Lone Wolf – How Emirates Team New Zealand stunned the world" (2017), an unauthorised account of Team New Zealand from 2003-2017 which near sold-out in two months, and was the biggest selling sports title in New Zealand in 2017.

## **6. Matters of Submission**

The matters which are raised in my notice of submission are summarised in 4 (a), (b), (c), (d) and (e) above. Team New Zealand has provided a list of requirements to Panuku Developments necessary to host an America's Cup in Auckland. The venue selection process has evolved to fit the best mix of uses, based on the Team New Zealand's requirements within in a politically acceptable space.

My comments are largely opinion based on my significant experience at the past three America's Cups, last three Olympic Regattas, and many World Championships rather than referencing any particular fact raised in the Application.

The Application seems to mainly concern planning and construction issues rather than use as America's Cup bases and how those should be arranged during an America's Cup Regatta and other Events. I can produce photographic evidence on many points mentioned, however it is not practical to introduce these images at this point because of time constraints as I am currently overseas.

If it pleases the Court these can be shown during the Hearing.

I have followed the hosting exercise for the 36<sup>th</sup> America's Cup since the day the trophy was won in June 2017, and indeed through the construction of the facilities after the 1995 America's Cup win. Two days after the America's Cup win in Bermuda I spent a couple of hours going through the venue at Cross Island, Bermuda shooting images showing how the venue unfolded.

While I believe Panuku Developments were caught a little unawares by the opportunity to host the 36<sup>th</sup> America's Cup, as can be seen in the video of the Planning Meeting of September 5 (see video link below), they have come up to speed very quickly and generally have done an excellent job in the circumstances, time frame available and the substantial political pressures.

## **7. Factual Information in relation to my Points of Submission**

- a. This Application is the second to be lodged by Panuku Developments and is about the eighth to be developed or publicly proposed by various parties. The solution covered by the Application is one which

- is politically acceptable, rather than one which is the optimum for an America's Cup Defence and Infrastructure in Auckland.
- b. It was obvious from the first meetings of the Auckland Council Governing Body and Planning Committee that no provision had been made for potential the hosting of America's Cup given that Emirates Team New Zealand had made the Challenger Final in 2007 losing 5-2 in controversial circumstances. In San Francisco in 2013, Emirates Team New Zealand lost by a very narrow margin. It was reasonably obvious that with a modicum of luck and a strong challenge that Team New Zealand would win the trophy back. It would have been prudent for some planning to have been done. The most relevant planning was for an extension of Halsey Wharf contained in the 2030-2040 phase of the Long term Plan (later said to have been "refreshed" in 2012) in case there was a need for additional facilities for fishing boats and superyachts. This can be seen in the Governing Body meeting on December 14, 2017 at 43m22sec [<https://youtu.be/IK8qLUGY928>].
  - c. At the Governing Body Meeting of the Auckland Council on December 14, 2017 options were still being canvassed. [<https://youtu.be/IK8qLUGY928> starting at 09.40] That meeting followed one three weeks earlier, also of the Governing Body [<https://youtu.be/63kNYTqYwUs> starting at 4hr 38m approx.] at which Sir Stephen Tindall said the team could live with other options other than the preferred one known as Halsey Street Extension.
  - d. Earlier meetings such as that of the Planning Committee on September 5, 2017 [<https://youtu.be/EhLI6PowhL8>] illustrate the division within the Council. Concern was expressed that America's Cup hosting requirements were not sympathetic to the Long Term Plans for the Halsey St/Wynyard Point area, and properly insisted on heavy weighting being given to Legacy Use of any new facilities.
  - e. The point is that a similar option which is the subject of the Application was considered and dismissed for reasons explained by the Panuku Development officers in the YouTube references above. Many of those reasons are still valid.
  - f. The Applicant's Amended Proposed Draft Consent Conditions (27 July 2018) in paragraph 198B Legacy Use Options requires the Consent Holder to prepare a Legacy Use Options Plan (LUOP), which would appear to satisfy many of the concerns raised above about long term use.
  - g. However 198C and (b) allows the LUOP to be submitted one month prior to any request for a plan change. 198C(c) allows the LUOP to be lodged "three months prior to the lodgement of any resource consent application by the Consent Holder (Panuku?) enabling the redevelopment of the area occupied by Bases B-G that would restrict the ability for events of a similar scale to the America's Cup".
  - h. All the Consent Holder is required to do is to submit a summary of consultation during preparation of the LUOP. There is some mention as to who must be consulted, notification requirements and consideration process etc.
  - i. The only parties that are specified for feedback in 198 are the Crown and/or Mana Whenua.
  - j. After the conclusion of the 2000 America's Cup several bases were passed to developers, even though another America's Cup Defence was to be staged in 2003. As we are now aware all the bases around the Viaduct Harbour have been redeveloped..

- k. The Long Term Plan of the Auckland Council and various graphics shown for public comment, show Wynyard Point, north of Jellicoe Street being used for an unspecified development – presumably apartments, commercial office space and hotels.
- l. While this Application covers the current America's Cup, and now a ten year period, 198C of the Amended Proposed Draft Consent Conditions (27 July 2018) provides a way where Wynyard Point can be taken for other development before the end of the 10 year period, and in my reading at one or three months notice depending on which approach is selected.
- m. It is difficult to clearly understand what obligations 198B and 198C imposes on the landowner or the Council in terms of future use
- n. In addition, the consultation base under 198C seems to be too narrow and needs to be broadened so that a much wider range of views can be canvassed, including those with a sailing or maritime event use. Or, that a caveat be placed on Wynyard Point north of Jellicoe Street and east of Hamer Street protecting that as public and marine and public events use space only.

## **8. Comment/Opinion in relation to my Points of Submission**

### **8.1 Long term use of Wynyard Point, Hobson Wharf & Halsey Street**

- a. The Application initially only looked at the land area and proposed works through the lens of a single America's Cup Defence. This was then extended to a 10 year period.
- b. Statistically in 160 years of America's Cup competition (35 Matches) there has been only one instance of the new Defender successfully conducting a single Defence. That was in 1987 in Fremantle, when Royal Perth YC lost to the San Diego YC – largely because the Australian Defence trial series was an acrimonious affair, and the Challengers were numerous and well-organised.
- c. Statistically there has been only one instance of the America's Cup being lost to a first time Challenger. That was in 2003 when Societe Nautique de Genvre (SUI/Alinghi) defeated Royal New Zealand Yacht Squadron (Team New Zealand) after six of the TNZ 2000 Defence crew joined the new Swiss team.
- d. Since 1983, statistically no team has successfully Defended more than twice. However the reason for the first instance is described in 8(b), the second is described in 8(c), the third (2010) was as a result of a case being taken to the New York Supreme Court and the Court-ordered 33rd Match sailed under the default provisions of the Deed of Gift (the 19<sup>th</sup> century document which governs the conduct of the America's . Cup). Only in the latest instance, in 2017 was the Defender genuinely out-designed and sailed in a multi-Challenger America's Cup Regatta.
- e. Statistically, it is therefore reasonable to plan for more than a single Defence, and there is no sound statistical basis for planning on the basis that there will only be two Defences. The gap between a first

and second Defence in the home waters of the Defender is usually three years.

- f. The Volvo Ocean Race has been running since 1973 and in 2023 will celebrate its 50<sup>th</sup> anniversary. The next race is scheduled to start in late 2021 from Alicante in Spain. For most of that 50 years, Auckland has been a stopover – being the geographic halfway point in the circumnavigation. It also has the best servicing facilities in the Southern Hemisphere and arguably the world, because of the presence of boat building, spar construction, sailmakers and composite engineers within an hour's drive of the stopover venue.
- g. The Volvo Ocean race is now under new ownership (Atlant Ocean Racing, owned by three former sailors in the event who have become successful team managers and were President and Co-President of the last edition of the race). Volvo's position as a sponsor has not been confirmed, other than they will remain as a sponsor.
- h. In an interview I conducted with Johan Salen (one of the new owners) [[sail-world.com/news/206366](http://sail-world.com/news/206366) and [sail-world.com/news/206251](http://sail-world.com/news/206251)] Salen advised that there would be some small changes in the route, mostly in regard to European stopovers. It is therefore likely that there will be a stopover in Auckland for future editions of the Race, if only on logistical grounds and regardless of the Host Port bidding process.
- i. In that interview [[sail-world.com/news/206366](http://sail-world.com/news/206366)] and subsequently confirmed that there would be two classes in the 2021 edition being the existing Volvo 65 one designs used in the last two editions, and the IMOCA60 class a popular short-handed trans-ocean racer in Europe. The outcome of that decision is that the Volvo Ocean Race fleet could expand to 16-20 boats, and it would probably not be possible to service the fleet of six and seven boats in the way that occurred in Auckland in the last two editions of the race, by being craned onto Halsey Wharf. The biggest fleet in the old Whitbread Round the World Race attracted a fleet of 29 yachts. The new organisers intention is to expand the fleet and the use of IMOCA60's should achieve this goal as there is a substantial existing fleet of boats in Europe.
- j. It is therefore reasonable to plan on the basis that Volvo Ocean Race stopovers in Auckland will continue for the foreseeable future, and with a considerably expanded fleet.
- k. In Europe there are also several other racing circuits in operation using foiling catamarans or similar that would logically come to Auckland for an event if the circuits decided to move outside Europe for a Southern hemisphere circuit in the northern hemisphere winter. These circuits run on an annual basis.
- l. Clearly there are a myriad of other uses for a waterfront marine events facility and park – covering waka ama, ocean swimming, ocean rowing which all are made difficult at present because of the lack of a specialist facility.

- m. There is a compelling case for retaining the area to be used by bases on Wynyard Point, beyond the just the America's Cup.
- n. The only buildings allowed on the Wynyard Point area should be those which are removable within six months of the unlikely eventuality of the Cup ever being lost by Team New Zealand. This style of building was used by then Land Rover BAR in Bermuda, and also for the America's Cup Events Authority and VIP hosting areas. They are very presentable and are preferable to the standard base design which has been proposed. Base design has moved a long way from the very basic steel shed style that existed in Auckland in 2000 and 2003.
- o. The Challenger teams generally have some high-end sponsors for whom image is all important. Any branding on the building is likely to be understated and chic, rather than garishly emblazoned as some would have the Court believe.
- p. Team bases in 2007 (Valencia), reused in 2010 (Valencia) and 2017 (Bermuda) were very attractive, given their practical use and the teams should be given a free design hand.
- q. The restrictions proposed Section 2 of the circulated document "America's Cup Wynyard Hobson Building Yard and Public Open Space Design Requirements 30 July 2018", are unnecessary and are a little insulting to the teams and their building designers/architects. At best the document should be guidance only with the addition of sections 23 and 24 being mandatory.

## 8.2 Downsizing plans due to reduced Entry

- a) The popular misconception with the America's Cup is that it is only worth contesting to win the trophy and the Defence rights. The reality is that an America's Cup team is a race team (the same as in F1). Because of the television and media exposure and prestige of the event it is possible to secure substantial sponsorship revenue to fund a team on a commercial basis like any other business. Team New Zealand has operated on this model for 30 years.
- b) Most of the Challenger Selection Series have shown a surplus from TV rights etc which has been distributed back to the Challenger teams. This surplus peaked in 2007 with a projected surplus of NZD\$48million, later said to actually be closer to NZD\$100million.
- c) It wasn't until 2003 that the billionaires (Bertarelli, Ellison etc) came into the Cup. Dennis Conner commented at the time that they would kill the Cup and to a large extent that has happened. The billionaires have largely vanished and the push with new teams now is to set up in the style of Team New Zealand and run strongly nationalistic campaigns. This 36<sup>th</sup> America's Cup is largely a rebuilding of the America's Cup to what it once was in the 1987-2007 period where generally there were 10-12 teams in the Challenger Series.
- d) The America's Cup nosedived after Golden Gate Yacht Club took Societe Nautique de Geneve to the New York Supreme Court over the legitimacy of their choice of Challenger, in August 2007.



- e) The consequence of this legal action which was in the NYSC for three years was that the America's Cup had a 10 year period of no real multi-challenger competition.

(It should also be noted that in 2017, in Bermuda, several/most of the teams received some financial or other support from Larry Ellison/Oracle Team USA, which inflated the fleet numbers from that had financially independent teams only participated.)

- f) The point of the summarised history above is that is very naïve to base planning for this America's Cup around the fact that currently there are only four announced teams, and therefore the planning for Auckland should be downsized to accommodate a four-team fleet. The longer-term situation must be considered for the 37<sup>th</sup> America's Cup and beyond, as well as events such as the Volvo Ocean Race, and events in which the citizens of Auckland and New Zealand can follow and experience first-hand

## **8.2 Long term base for Team New Zealand**

- a. All previous proposals contained a long term base for Team New Zealand, except for the current Application.
- b. The team and Sir Peter Blake, along with the 1995 America's Cup win were the *raison d'être* for the creation of the Viaduct Harbour facility.
- c. The team has been progressively relocated around and out of that environment.
- d. There has developed what is an "America's Cup Hub" in Auckland – being the National Maritime Museum housing NZL32, the 1995 America's Cup winner; the "Big Boat" on permanent display outside the National Maritime Museum since the 1988 America's Cup; and the Sail New Zealand operation which offers very popular sailing sessions in the America's Cup Class yachts used from 1992-2007 America's Cups.
- e. It would be logical to complete this America's Cup hub with a permanent base for Emirates Team New Zealand on the end of Hobson Wharf – after Luna Rossa have vacated.
- f. Maybe with the addition of KZ-7, Kiwi Magic, at some later stage that would give the complete America's Cup experience from past through to present. Creation of an America's Cup Hub will be a vital tourist and visitor attraction in waterfront Auckland and the only instance of such a facility in the world.

## **8.3 Wynyard Point Retention and the Doctrine of No More Harbour Intrusion**

- a) Without recapping the last 12 months or so of the planning history for the America's Cup bases and waterfront planning issues generally, it is now accepted that there can be no more intrusion into water space

in the inner Waitemata Harbour beyond that contemplated in this Application.

- b) The Doctrine was first mooted in 2015 when the Ports of Auckland were forced to stop work on a 100 metre wharf extension after the High Court ruled that the consents for the project were invalid because the public had not been given a say.
- c) There is discussion above on the need for long term planning in regard for the rejuvenation of land created on Wynyard Point as a direct consequence of the America's Cup hosting.
- d) The Application being considered by the Court shows the creation of breakwaters mid-way up the eastern side of Wynyard Point and protruding from Halsey Street extension.
- e) If the southern half of Wynyard Point, where bases are proposed to be located, is allowed to be taken for re-development [as is the proposed right of the Consent holder in 198B and 198C of the Applicant's Amended Proposed Draft Consent Conditions (27 July 2018)], then the northern end of Wynyard Point becomes unusable for America's Cup bases and other uses because no breakwaters can be built to provide sheltered water in this location.
- f) Under the Doctrine of No More Harbour Intrusion, it would not be possible to build new breakwaters, and indeed because of the geography of the harbour in this location would only be able to run from Wynyard Point east to the outer end of Princes Wharf.
- g) Such a proposal would inflame the public ire to the point where it would over-ride and make irrelevant any legal process to permit the construction of new breakwaters..
- h) Therefore because of the effect of the Doctrine of No More Intrusion this Application is the last opportunity to create waterfront space adequate to host an America's Cup, Volvo Ocean Race and other maritime events.

#### **8.4 Security**

- a) The current plan is close to several others involving Wynyard Point that were rejected by Panuku Developments for reasons which are explained in the Youtube clips previously referenced of meetings of the Auckland Council Governing Body and Planning Committee.
- b) Security was mentioned as a topic in the Mediation process but was not discussed. Subsequently the Crown has issued a letter saying that the America's Cup will be declared to be a Major Event in accordance with the Major Events Act 2007.
- c) At an Olympic Games the approach with security is to cordon off an area extending up to 1km or more from the Regatta venue and put in place a lockdown for the duration of the Regatta.

- d) Entry to this area is only by accreditation and it is a police/military lock down with patrols, and a heavy and obvious presence of armed troops capable of moving quickly to prevent any breach of the cordon. Suspicious packages also have to be handled and in the Rio Sailing Olympics there was an instance of a discarded bag being shot and then blown up within 100 metres of the media centre and just outside the cordon by a bomb squad member and robot.
- e) The same level of military lock down was also applied at the 2010 America's Cup in Valencia, partially due to the fact that internal terrorism was rife at the time.
- f) Strangely this level of protection is the most pleasant to be within, as once through you feel safe and most realise that the lockdown is for their benefit and protection.
- g) At the 2013 and 2017 America's Cups there was airport style security in place – which meant that all entrants (including fans) were required to have accreditation or paid ticket scanned and verified each time they passed through the main gate. There was full bag search and a full body scan. This process worked with maximum crowd of 10,000 fans plus a further 1000 team and media personnel.
- h) For photographic media there was a second security check at the same level as the entry gate when returning from off the water. This was quite an issue as the camera gear was being exposed and handled by people who were clearly not photographers, in addition there was a mix of wet and dry gear and clothing which created further potential for damage.
- i) Photographers have to strip down from full wet weather gear for the second body scan. This is a time consuming procedure as they leave the photo boats en masse and have to pass through a single search and scanning checkpoint.
- j) These media searches were not done in the military lock downs. Once inside the cordon people could move freely. The secondary and subsequent media scans in Bermuda were very inconvenient and frustrating for photographers who also have deadlines and can't afford the time to queue for a security check. Delays were often created by scanner and network malfunction.
- k) The flippant comment has been occasionally made in New Zealand that security can be covered in the same way it was handled during the Rugby World Cup. This is naïve.
- l) The difference between the America's Cup and Rugby World Cup is that the America's Cup attracts many of the world's wealthiest people and so-called "A-Listers". In Bermuda this issue was addressed by docking their superyachts in a second secure area that could only be reached by walking through the main America's Cup village. The plans for Auckland do not seem to recognise this issue with superyachts and their owners being within easy and very obvious reach of the public, (and terrorists).

- m) It is worthwhile remembering that the Rainbow Warrior was blown up by the French Secret Service just a few hundred metres from the proposed America's Cup Village site.
- n) In my view there needs to be early Police and Security involvement into the design of the America's Cup Village and environs to make the area as safe from terrorism as practical.
- o) The level of security applied in the Volvo Ocean Race Village, is not acceptable for an America's Cup as the security is minimal, and well below that of the other Olympic and America's Cup events mentioned above. These security measures also have an effect on residents who live inside any secure zone that may be created, for the period of the regatta. Vehicles are generally banned from passing beyond a cordon.

### **8.5 Public Transport**

- a) Public transport must be the only way of access to the America's Cup Village area. The notion that a family can drive to the venue and get parking and then leave at the end of a race day will not work in the America's Cup Regatta.
- b) This worked well in Bermuda and fans have to be forced to walk to get public transport - particularly to catch ferries and ideally these will come into the Cup Village.
- c) Fans need to be educated and forced to use public transport to get to the venue.
- d) This worked very well in Bermuda - with fans being able to be dropped at the America's Cup Village by ferry. The Britomart transport hub is very close to Halsey Street and Hobson Wharves. The America's Cup Village in Bermuda had a capacity (ticket sales) of 10,000 almost all of whom came to the venue by ferry (a 12 minute trip, instead of 35 minutes by road from Hamilton, Bermuda).
- e) While there is a ferry terminal in Auckland as there was in Bermuda, additional ferry berthing was created adjacent and inside Bermuda's America's Cup Village so visitors only had a short walk to board the ferry and be taken back to their vehicle or home in Hamilton or one of the other towns on Bermuda.
- f) The long term benefit to Auckland that forced use of public transport changes the public mindset and attitude towards using public transport instead of a car.

### **9 Points of Objection:**

Although I am in support of the Application I am not satisfied with the responses provided by (Applicant) specifically:

- a) the Applicant's Amended Proposed Draft Consent Conditions (27 July 2018) in paragraph 198B and 198C regarding the use of Wynyard Point

- b) the restrictions proposed in Section 2 of the circulated document “America’s Cup Wynyard Hobson Building Yard and Public Open Space Design Requirements 30 July 2018”
- c) there is no plan in place to describe how security will operate in a dispersed facilities configuration and within the unique circumstances of an America’s Cup regatta.

### **Relief Sought**

9. My objections will be satisfied or partly satisfied if the project is amended to achieve the following changes:
- (a) The Consent Conditions are redrafted, or another legal mechanism deployed which will prevent any development of the area of land bordered in the south by Jellicoe Street, and east of Hamer Street other than by temporary buildings associated with maritime and other major events.
 

The best option is a form of open space zoning that recognises and provides for use for a future event, and with the land uses in the interim period not involving built development or other uses that could compromise that use.

If this is not within the power of the Court, then the Auckland Council, should be required to make a plan change, or if Wynyard Point is currently zoned open space, a plan change could introduce a new and special provisions along the lines described above.

Further, the Applicant’s Amended Proposed Draft Consent Conditions (27 July 2018) in paragraph 198B and 198C and (b) allows the Legacy Use Options Plan (LUOP) to be submitted one month prior to any request for a plan change. 198C(c) allows the LUOP to be lodged “three months prior to the lodgement of any resource consent application by the Consent Holder enabling the redevelopment of the area occupied by Bases B-G that would restrict the ability for events of a similar scale to the America’s Cup”.

I would like to see both periods changed to 12 months to enable a proper process of consultation to be undertaken.
  - (b) The restrictions proposed in Section 2 of the circulated document “America’s Cup Wynyard Hobson Building Yard and Public Open Space Design Requirements 30 July 2018” be deleted as they are contrary to past practice with the America’s Cup Regatta and impose a degree of control which is unnecessary.
  - (c) A workable security plan is produced to be included with the Application, so that multiple security checks for accredited media are obviated.

**Evidence prepared by Richard Gladwell, Director, Sail World NZ Ltd**

A handwritten signature in black ink, appearing to read 'Richard Gladwell', with a horizontal line underneath the name.

**Signed:**

**Date: 21<sup>st</sup> day of August 2018**