Horsham Downs Estate



Horsham Downs Estate Limited

June 2026

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1. INTRODUCTION

1.1 This document is to support a referral application by Horsham Downs Estate Limited ("the applicant") under the Fast-track Approvals Act 2024 ("FTAA") for the "**Horsham Downs Estate Project**" (hereafter referred to as "the Project").

1.2 This document has been provided as a companion document (and as **Attachment 1**) to the Application Form, addressing those matters which require a detailed response and explanation, and should be read together with the Application Form.

1.3 Care has been taken to ensure the two documents are consistent, but if there is any inconsistency, the content in this document prevails.

1.4 The application is also accompanied by the following:

(a) Project Site Map (**Attachment 2**)

(b) Records of Title and registered instruments (**Attachment 3**)

(c) Concept Plan (**Attachment 4**)

(d) Planning Memorandum (**Attachment 5**)

(e) Infrastructure Report (**Attachment 6**)

(f) Stormwater Memorandum (**Attachment 7**)

(g) Groundwater Availability & Drawdown Assessment (**Attachment 8**)

(h) Geotechnical Assessment (**Attachment 9**)

(i) Traffic Assessment (**Attachment 10**)

(j) Landscape Memorandum (**Attachment 11**)

(k) Urban Design Memorandum (**Attachment 12**)

(l) Ecology Assessment (**Attachment 13**)

(m) Archaeology Assessment (**Attachment 14**)

(n) Economic Impact Assessment (**Attachment 15**)

(o) Record of Engagement (**Attachment 16**)

(p) Letter of Authority (**Attachment 17**)

1.5 Horsham Downs Estate Limited is the authorised person for the purposes of section 13(2)(b) of the Fast-track Approvals Act 2024 (FTAA).

1.6 Horsham Downs Estate Limited is a sister company of the general partner of the limited partnership which is the registered owner of the land forming the Project Area (excluding the surrounding roads). The company directors are experienced in land development projects.

1.7 The combined Horsham Downs Estate Limited directorship:

(a) Equates to some 65 plus years in the building and civil construction industries, including infrastructure and three waters works.

(b) Has delivered over 1000 residential lots (comprising a mix of vacant lots and construction of stand alone, terraced and duplex dwellings) in the last 5 years.

Assessment against clause 21

1.8 The below address the relevant criteria of Clause 21 of the FTAA set out below:

(c) The Project meets the criteria in section 22 of the FTAA, for the reasons outlined in Section 2 below;

(d) The Project does not involve any ineligible activities – see Section 3 below;

(e) Adequate information has been provided in the application and thus companion document along with supporting materials;

(f) The Project is not inconsistent with any Treaty settlements or documents listed in s21(5)(a) – see Section 8;

(g) The FTAA process is the most appropriate process to acquire the necessary approvals for the Project;

(h) As outlined in the accompanying Planning Memorandum (**Attachment 5**) and supporting technical assessments, the project is not considered to have any significant adverse effects on the environment;

(i) The Applicant does not have a history of poor compliance under any of the specified Acts that relate to the proposed approvals;

(j) The site does not include land that the Minister for Treaty of Waitangi Negotiations considers necessary for Treaty settlement purposes;

(k) A substantive application for this Project would not have any competing applications and there are no existing resource consents for the same activity.

(l) While the Project involves a prohibited activity:

i. It is not a prohibited activity in terms of s15C of the RMA (Prohibitions in relation to radioactive waste or other radioactive matter and other waste in coastal marine area);

ii. It does not involve discharge of harmful substances from ships or offshore installations;

iii. The actual physical and biophysical effects would be comparatively minor;

iv. One prohibited activity classification arises from the district plan's implementation of a strict set of provisions to implement the National Policy Statement for Highly Productive Land and has classified a range of matters as prohibited activities, even though in a number of respects the proposed land use and subdivision is no longer restricted (as a result of the changes to the NPS-HL in December 2025).

v. Another potential prohibited activity classification arises from the presence of 4 small and isolated features onsite that might be characterised as natural inland wetlands under the NES Freshwater. If so, the Project would trigger a prohibited activity status under the NES Freshwater. Cumulatively, these features, which are individually small and ecologically isolated (not connected to the Waikato River catchment), amount to approximately 0.4ha. The Project proposes to establish approximately 10ha of stormwater management features, including wetlands. This will lead to a considerable net gain and will be connected to the Waikato River catchment, and therefore have substantially greater ecological value.

vi. The Project helps to create a well-functioning urban development, is regionally significant housing and will improve housing affordability by supporting competitive land and development markets.

vii. S21(7) of the FTAA expressly anticipates that some prohibited activities may be referred. It states:

To avoid doubt, the Minister is not prevented from accepting a referral application, or referring the whole or a part of a project to the fast-track approvals process, just because the project involves an activity that is a prohibited activity under the Resource Management Act 1991.

2. PROJECT DESCRIPTION AND LOCATION

2.1. The following sections provide the required responses to the following matters:

- Section 2.2.1: Project Description
- Section 2.2.2: Provide a description or map of the whole project that identifies its boundaries in sufficient detail to enable consideration of the referral application

Project description (Referral Application Section 2.2.1)

2.2. The following is a high-level description of the project. At the end of this section is a concise description of the project suitable for inclusion as the description of a referred project.

2.3. The Project is a design-led, comprehensively master-planned, residential neighbourhood and directly responds to sustained housing demand in the Waikato region.

2.4. The purpose of the Project is to deliver a significant quantum of housing, involving a mix of housing typologies to support a range of household types, life stages and budgets in a highly accessible location, while contributing to a logical expansion of the Hamilton metropolitan area. The intended development layout is illustrated by the concept plan in **Attachment 4**. A proportion of the household units (up to 5%) may be "live work units" which contain both a commercial / industrial component as well as a household unit.

2.5. The Project will deliver:

(a) Residential development and subdivision to provide for approximately 850-950 residential lots/dwellings, delivering a mix of housing typologies to support a range of household types, life stages, and budgets. It is intended that most dwellings/lots will contain standalone, duplex or terrace dwellings, but at this stage the scope of the proposal is intended to cover all forms of residential activity (including live-to-work units) irrespective of how it might be defined in the district plan and may include live work units;

(b) A neighbourhood centre located and designed to provide for everyday services and employment opportunities, likely including retail activities, commercial, food and beverage premises, community facilities, and other complementary uses that reduce travel demand and support local living. The live work units may also include light industrial/commercial type activities such as but not limited to servicing, repairs and light fabrication;

(c) An open space and green–blue network, incorporating low-lying areas, a neighbourhood park, and landscape buffers that enhance amenity and ecological outcomes.

(d) A range of associated or ancillary activities which are permitted under the district and/or regional plans.

(e) Significant economic benefits. The economic impact assessment in **Attachment 15** identifies that construction works would enable a $598.8million development, contributing approximately $181.9 million to GDP and supporting approximately 1,148 FTE jobs. When indirect effects are included, the total construction impact is estimated at approximately $355.6 million in GDP and 2014 jobs. The Project would result in flow-on economic benefits to primary industries, including approximately $10 million in GDP and 6 FTE jobs.

Once complete, on-going household expenditure associated with the Project is estimated to generate approximately $45.2 million per annum, contributing approximately $25.1 million to GDP per annum and supporting approximately 250 FTE jobs.

(f) Employment opportunities through construction works (some 1,148 FTE jobs), live work units and the ability for new residents to be close to Hamilton's existing commercial and industrial activities, and a regional arterial Road (Gordonton Road) and State Highway 1 which provide for direct and convenient access to other employment destinations.[1]

2.6. The delivery of the Project also requires the following:

(a) Land modification across the sites (including potential watercourse works, wetland reclamation and offsetting works).

(b) Infrastructure including new roads, water and wastewater supply networks, and stormwater management devices and networks.

(c) Provision for "self-servicing" for wastewater treatment/disposal and water treatment and supply (in the event that connections to existing reticulated networks for these services are not available).

2.7. Referral of the Project to the fast-track approvals process would facilitate the Project by enabling it to be processed in a more timely and cost-effective way than under normal processes. Typically, a plan change would be required due to the prohibited activity component under the District Plan; However, if prohibited activity status is triggered under the NES Freshwater, the fast track will be the only available process for the Project to proceed. It is also unlikely to materially affect the efficient operation of the fast-track approvals process (as discussed in more detail below). The Project therefore meets the criteria for referral under s 22(1) of the FTAA.

2.8. The referral application relates to consents and approvals to be sought under the RMA, Heritage New Zealand Pouhere Taonga Act and Wildlife Act. The Planning Memorandum (**Attachment 5**) outlines the approvals to be sought. These include approvals under the Wildlife Act 1993 if protected species are identified within the site, and an Archaeological Authority and approval of a person to carry out an archaeological activity under the Heritage New Zealand Pouhere Taonga Act. Approvals under the Fisheries Regulations 1983 are not anticipated to be required, if they are they will be sought under a separate process.

2.9. If the Minister decides to refer the project, for the purposes of the referral decision notice the project could be described as follows:

The project is to construct and establish an urban development on approximately 54 hectares at Gordonton Road in the Waikato Region. The project involves:

a. land use and subdivision activities to create:

i. approximately 850-950 lots for residential activities (inclusive of live work units, which include a residential component as well as a commercial and/or light industrial activity component);

ii. a neighbourhood centre;

b. Land modification works (including potential watercourse works, wetland reclamation and offsetting works).

c. Infrastructure including new roads and existing road upgrades, water and wastewater supply networks, and stormwater management devices and networks (including necessary any takes and discharges of water).

Site description (Referral Application Section 2.2.1)

2.10. The Project Area is generally located at 319 Gordonton Road, Gordonton, 3281. Specifically, it comprises:

(a) **RT SA3D/1116** – Lot 1 DPS 9149 – 10.8810 ha;

(b) **RT SA63A/920** – Lot 1 DPS 79016 (3.6562 ha) and Lot 1 DP 24870 (39.4568 ha). The total area is 43.113 ha.

2.11. The Project involves a total developable land area of approximately 54 ha.

2.12. The Project would include works on Gordonton Road (such as roundabout construction) and, potentially, on Haynes Place.

2.13. A map of the Project Area is provided as **Attachment 2**.

2.14. The Records of Title are provided in **Attachment 3** to the Application. The interests associated with the titles are also provided in **Attachment 3**, none of which affect the ability for the Project to be implemented.

2.15. A more detailed site description, including zoning, is provided in section 3 of the Planning Memorandum (**Attachment 5**).

3. NO INELIGIBLE ACTIVITIES

3.1. The Project does not involve any ineligible activities as defined by Section 5 of the FTAA and as demonstrated in the table below.

Reference		Application
Section 5(1)(a)	*An activity that -* *(i) would occur on identified Māori land; and* *(ii) has not been agreed to in writing by the owners of the land or been subject to a determination under section 23:*	The Project is not on land identified as Māori land.
Section 5(1)(b)	*An activity that -* *(i) would occur in a customary marine title area; and* *(ii) has not been agreed to in writing by the customary marine title group:*	The Project is not on land identified in a customary marine title area.
Section 5(1)(c)	*An activity that -* *(i) would occur in a protected customary rights area; and* *(ii) would have a more than minor adverse effect on the exercise of the protected customary right; and* *(iii) has not been agreed to in writing by the protected customary rights group*	The Project is not on land identified as a protected customary rights area.
Section 5(1)(d)	*an activity that would occur on either of the following classes of land:* *(i) Māori customary land:* *(ii) land set apart as a Māori reservation as defined in section 4 of Te Ture Whenua Maori Act 1993:*	The Project is not on land identified as Māori customary land.
Section 5(1)(e)	*an aquaculture activity or an activity that is incompatible with aquaculture activities—* *(i) that would occur within an aquaculture settlement area declared under section 12 of the Maori Commercial Aquaculture Claims Settlement Act 2004 or an area reserved under another Treaty settlement for the aquaculture activities of a particular group; and* *(ii) for which the applicant who is proposed to hold an approval described in section 42(4)(a) (resource consent) is not authorised to apply for a coastal permit under the Resource Management Act 1991:*	The Project is not an aquiculture activity or an activity that is incompatible with aquiculture activities.
Section 5(1)(f)	*an activity—* *(i) that would require an access arrangement under section 61 or 61B of the Crown Minerals Act 1991; and* *(ii) that—* *(A) could not be granted an access arrangement because of section 61(1A) of that Act; or* *(B) would occur in an area for which a permit cannot be granted under that Act:*	The Project does not require an access arrangement under the Crown Minerals Act.

Reference		Application
Section 5 (1)(g)	*an activity that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the Resource Management Act 1991,*	The Project is not related to occupation of common marine and coastal area.
Section 5 (1)(h)	*an activity (other than an activity that would require an access arrangement under the Crown Minerals Act 1991) that—* *(i) would occur on land that is listed in Schedule 4; and* *(ii) has not been subject to a determination under section 24:*	The Project is not located on land listed in Schedule 4 of the FTAA. Refer to records of title in Attachment 3
Section 5 (1)(i)	*an activity that—* *(i) would occur on a national reserve held under the Reserves Act 1977; and* *(ii) requires approval under that Act; and* *(iii) has not been subject to a determination under section 24:*	The Project is not occurring on a national reserve held under the Reserves Act 1977. Refer to records of title in Attachment 3
Section 5 (1)(j)	*an activity that—* *(i) would occur on a reserve held under the Reserves Act 1977 that is vested in someone other than the Crown or a local authority; and* *(ii) has not been agreed to in writing by the person or persons in whom the reserve is vested:*	The Project is not occurring on a vested reserve held under the Reserves Act 1977. Refer to records of title in Attachment 3
Section 5 (1)(k)	*an activity that—* *(i) would occur on a reserve held under the Reserves Act 1977 that is managed by someone other than the Department of Conservation or a local authority; and* *(ii) has not been agreed to in writing by the person or persons responsible for managing it*	The Project is not occurring on a reserve held under the Reserves Act 1977. Refer to records of title in Attachment 3
Section 5 (1)(l)	*an activity that is—* *(i) a prohibited activity under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or regulations made under that Act; or* *(ii) an activity that is described in section 15B of the Resource Management Act 1991 and is a prohibited activity under that Act or regulations made under it; or* *(iii) an activity that is prohibited by section 15C of the Resource Management Act 1991:*	The Project is not for a prohibited as described under section 37 of the Exclusive Economic Zone and Continental Shelf Act 2012. Proposal is not for an activity related to ships or offshore installations under s15B of the RMA. Proposal is not for activity related to radioactive waste under s15C of the RMA.
Section 5 (1)(m)	*a decommissioning-related activity (which is an activity described in section 38(3) of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012):*	The Project is not for a decommissioning-related activity associated with a marine consent.
Section 5 (1)(n)	*an activity undertaken for the purposes of an offshore renewable energy project.*	The Project is not for an offshore renewable energy project.

4. SIGNIFICANT REGIONAL BENEFITS

4.1. The following sections provide the required responses to the following matters:

- Section 2.6.1: The criteria for accepting a referral application is that the project is an infrastructure or development project that would have significant regional or national benefits. Explain how this project satisfies that criteria.

4.2. The Project meets this criterion. It will provide approximately 850 to 950 dwellings (and may provide up to with up to a 5% live/work component) which will assist in meeting the demand for housing in a location that is close to arterial routes, and employment and recreation opportunities in Hamilton City, but also other destinations within the Waikato region.

4.3. The scale of the Project is considered substantial in that it will help address housing shortfalls across two territorial jurisdictions within the Waikato region (i.e. Waikato District and Hamilton City). In this respect, the Housing and Business Capacity Assessments ("HBA") undertaken by both authorities identify shortfalls in Waikato District across all scenarios and dwelling typologies, including a shortfall in Hamilton City of around 2800 dwellings in the medium term (i.e. the 10-year period for Years 2022 to 2032 based on Hamilton City Council's HBA 2023.). Importantly, approximately 50% of Waikato District's short-term shortfall is concentrated in the north-east catchment of Hamilton City.

4.4. In terms of housing type, the economics assessment confirms that there are specific shortfalls in detached housing typologies and, significantly, approximately 50% of Hamilton City's shortfall is for detached housing. There is an observed trend of housing delivery shifting towards higher density formats, where the number of townhouses has grown rapidly and making up 50% of all consents granted since 2016.

4.5. The Project can directly contribute to providing additional housing stock. The concept plan includes mid-sized lots which will enable construction of detached typologies.

4.6. The private water supply and WWTP options will enable the Project to be satisfactorily serviced in the event that connections to the existing public reticulated water and wastewater networks in the vicinity are not available. These options can be funded by Applicant without being reliant on the councils. On-going management of any necessary private networks for water and wastewater would be via a residents' association (or similar entity).

4.7. The Project is a large-scale development initiative that will deliver significant and enduring economic, social, cultural, and environmental benefits to the Waikato region – including through the construction phase.

4.8. Key benefits include:

1) Increased housing capacity

4.9. The Project will provide approximately 850 to 950 dwellings involving a range of housing typologies. By providing an increased supply of housing, this would help create a more balanced housing market, making home ownership more attainable and easing the financial burden on renters. It increases competition in the market and the range of housing options. The location of the additional housing is also important as it assists to provide a range of convenient and competitive housing options around Hamilton and in the Waikato Region.

2) Employment Opportunities (social, economic and cultural benefits):

4.10. The Project will provide employment opportunities through construction works and on-site employment, as well as for future residents/occupiers in any live work units and given the proximity of industry and commerce in Hamilton City, but also other destinations within Waikato District and the wider Waikato region. Its location adjacent to Gordonton Road (regional arterial) and close to State Highway 1 provide opportunities for residents to travel convenient distances to a range of destinations for employment and recreation.

4.11. As noted above and outlined in detail within **Attachment 15**, the construction of the proposal would enable a $598.8million development, contributing approximately $181.9 million to GDP and supporting approximately 1,148 FTE jobs. When indirect effects are included, the total construction impact is estimated at approximately $355.6 million in GDP and 2014 jobs. The Project would result in flow-on economic benefits to primary industries, including approximately $10.2 million in GDP and 6 FTE jobs. Once complete, on-going household expenditure associated with the Project is estimated to generate approximately $45.2 million per annum, contributing approximately $25.1 million to GDP per annum and supporting approximately 250 FTE jobs.

3) Significant economic investment and subsequent economic impacts (including significant economic and social benefits):

4.12. The significant economic investments involved in the Project are explained in the economic assessment within **Attachment 15**. This will deliver significant economic benefits for district and regional economies including expenditures as noted above.

4.13. The Project will be a catalyst for further investment in and around this part of Rototuna/Hamilton which will further stimulate economic activity and employment across multiple sectors.

4.14. The economic benefits of the Project will extend well beyond its construction phase and deliver a range of wider economic benefits that accumulate annually over the economic life of the assets. Urban Economics has assessed those economic benefits as meeting the threshold of regional significance under section 22(2) of the Act.

4) Achieving Te Ture Whaimana / Vision and Strategy for the Waikato River (environmental and cultural benefits):

4.15. The WWTP option will produce a high quality level of wastewater treatment and consequently an acceptable discharge. The Infrastructure Report in **Attachment 6** outlines the quality of the treatment proposed.

4.16. The proposal avoids direct discharge of wastewater into streams and provides for a more acceptable environmental outcome, including from a cultural perspective. The opportunity for land-contact devices contributes to the creation of wetland ecosystems and habitat.

4.17. Stormwater from impervious surfaces will be treated and attenuated to maintain or improve water quality and to manage erosion from increased flows, with reduced sedimentation and nutrients in the stormwater as a result of moving away from farming activities. The Project Area will include stormwater treatment wetlands, consistent with the Regional Council standards which have previously been set in order to achieve Te Ture Whaimana.

4.18. Proposed plantings within the Project Area will enhance water quality and ecosystem values, creating habitat and ecological connections in this vicinity. The removal of stock and the planting of riparian/indigenous vegetation will decrease nutrient runoff.

4.19. The Project is consistent with the objective of the Vision and Strategy as, overall, it will restore and protect the health and wellbeing of the Waikato River. The Planning Memorandum in **Attachment 5** evaluates the Project against the Vision and Strategy for the Waikato River.

5) Environmental Sustainability (ecosystems):

4.20. The Ecological Solutions memorandum (**Attachment 10**) has identified measures to appropriately avoid, mitigate, offset and if necessary compensate adverse effects and are consistent with the effects hierarchy. This includes the establishment of stormwater wetlands, implementation of management plans (e.g. for lizards, bats, fish and birds), best-practice erosion and sediment controls, appropriate culvert design to provide for fish passage, restoration planting and weed/pest control, and careful management of discharges to align with Waikato Regional Council guidelines. The above works and consideration of Wildlife Act Authority requirements (should protected species be present) will be fully addressed through the substantive application.

4.21. Overall, the Project will provide significant biodiversity benefits for terrestrial and aquatic ecology. Landscaping will create ecological corridors and increase the habitat available for regionally and nationally important biodiversity.

4.22. The Project will also provide a number of additional benefits (in terms of section 22(2) of the FTAA) that are explained below in section 5 and in section 7 about non-monetary benefits.

5. APPROPRIATENESS FOR FAST TRACK APPROVALS PROCESS

5.1. The following sections provide the required responses to the relevant matters raised in Section 2.6.2 which requires an explanation of how referring the project to the fast-track approval process. The following matters are relevant and have been addressed below:

- Section 2.6.2.1: Fast tracking would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes.
- Section 2.6.2.2: The project is unlikely to materially affect the efficient operation of the fast-track approvals process.
- Section 2.6.2.5: Will the project increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020). If yes, explain how the project will achieve this.
- Section 2.6.2.6: Will the project deliver significant economic benefits, and if so how.
- Section 2.6.2.9: Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions, and if so, how?
- Section 2.6.2.10: Will the project support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards, and if so, how?
- Section 2.6.2.11: Will the project address significant environmental issues, and if so, how?

Referral to the fast-track process would facilitate the project, including by enabling it to proceed in a more timely and cost-effective way than under normal processes (Referral Application Section 2.6.2.1)

5.2. The FTAA process offers a number of advantages in terms of time and cost savings over the standard RMA process.

5.3. Firstly, use of the fast track process enables a consideration of what would otherwise be a prohibited activity. It is not possible for Waikato District Council to accept any application for a prohibited activity, let alone consider it, and a plan change would not avoid the possibility of a prohibited activity being triggered under the NES Freshwater by the Project in the matter currently proposed. The FTAA process therefore provides an opportunity to consider the merits of a proposal outside of the standard District Plan/RMA framework. This includes being able to create freehold titles for each proposed new dwelling so as to provide future residents with a guaranteed and secure form of land tenure.

5.4. Secondly, it enables time and cost savings over the standard RMA process. Notwithstanding the prohibited activity status, without the time and costs savings afforded by the fast-track process, those component benefits described above, particularly in terms of needing to provide capacity for new housing, would not be able to be offered to the community.

5.5. Under a typical RMA process a rezoning via a Private Plan Change, followed by a resource consent process, would likely be required given the Project Area's current zoning.

5.6. WDC declared the Waikato District Plan part operative in 2025 following a comprehensive review process and appeals are still to be resolved in respect to the identified subdivision rules for the General Rural Zone which are relevant to the Project. There is considered to be little prospect of WDC accepting a private plan change to rezone the Project Area for urban purposes prior to any resolution of those appeals or even within a two year period starting from when those resolved rural subdivision rules are made operative. Councils are starting to rely more heavily on the 2 year stand down, particularly after the *Arvida v Auckland Council* ([2026] NZEnvC 049) decision. That case also highlighted that it can take over 12 months just to lodge and challenge the relevant council regarding a rejection of a plan change, let alone the 2-3+ year process for a plan change to be determined on its merits.

5.7. Even if a private plan change were to be accepted for processing, the RMA allows up to two years for decision-making on a private plan change from the date of public notification. Recent private plan changes in the wider Waikato Region have taken between 6-12 months from lodgement to reach the milestone of notification. This means, in total, a private plan change process can take close to three years. The plan change may then subsequently be appealed to the Environment Court (including by Council and its CCOs), a process that requires in the order of a further one to two years to conclude.

5.8. Subsequent to securing a plan change, resource consents for the development would then need to be obtained. Resource consents for the entire Project would be expected to take at least 2 years, if not longer, to process though the regional and district councils based on previous experience by the team for development in and around Hamilton City.

5.9. If the proposal were to involve land use only (and no subdivision), this would require consents for a non-complying activity. Without a fast-track process for this scenario, the proposal would most likely be publicly notified because residential development on a site in the General Rural Zone is not anticipated by the Waikato District Plan, the Waikato Regional Policy Statement , or any growth strategy, but also because of the option of a privately owned and operated WWTP and treated wastewater discharge.

5.10. Comparisons with other notified activities of scale in the Auckland/Waikato regions in recent years suggest that approximately 24 months from lodgement would be required to secure a hearing. Again, publicly or limited notified applications can be appealed by submitters to the Environment Court, adding another 1-2 years of process before consents are finally secured. Thus, it is estimated that the processes that will be replaced by a successful Fast-track Approvals Act referral would add up to 2 to 4 years.

5.11. The FTAA process provides different criteria to those in the RMA. In this case, the process would create an opportunity to contribute to a well-functioning community that is a logical extension to Hamilton City. This will contribute to addressing housing shortages in both Hamilton City and Waikato District.

5.12. The purpose of the Fast-track Approvals Act is "*to facilitate the delivery of infrastructure and development projects with significant regional or national benefits*." This reflects a recognition that the RMA has not always enabled such developments to proceed in a timely manner, notwithstanding the policy direction provided by the National Policy Statement on Urban Development. There is an urgent need to provide for additional housing to meet increasing demand and in appropriate locations that are convenient in respect to needed goods and services, employment and recreation opportunities.

5.13. The FTAA provides a mechanism to enable projects to progress in a way and in a timeframe that is not possible under the RMA (including the ability to consider proposals that have a prohibited activity status). By referring the Project to the FTAA process, it can be advanced and in a timely and cost-effective way, giving confidence that the investment and development will translate into delivery of homes, on the ground.

5.14. In addition, the use of the FTAA will allow any regional policy that seeks to avoid effects that might be created by this Project to be weighed in the decision-making, rather than determining its outcome. The panel appointed to consider the substantive application will be guided by the wider imperatives of schedule 5, cl 17 of the Fast-track Approvals Act 2024, enabling a more holistic approach to be taken in providing for growth.

5.15. The Applicant is committed to managing the anticipated and known effects of the Project through the substantive application (design, mitigation measures and management plans).

5.16. The consenting timeframe under the fast-track process is likely to be in the order of six months from lodgement of the substantive application. This is a significant time saving, compared to a standard process and will enable the significant regional benefits (through works on the ground and employment) at least two and a half to six years ahead of a standard process.

5.17. In addition, the one-step nature of the fast-track approvals process is likely to lead to significant efficiencies and cost savings, especially when compared to the scenario of a private plan change and/or applications for resource consents under the standard process, which may take up to 8 years (including the potential for appeals at multiple steps) to complete.

5.18. This is significant in that it provides a pathway to consider the merits of an application whereas there is no ability to consider a prohibited activity under the RMA.

Referral is unlikely to materially affect the efficient operation of the fast-track approvals process (Referral Application Section 2.6.2.2)

5.19. The Project is not expected to materially impact the operation of the fast-track approval process.

5.20. The consents and approvals sought are those under the RMA, Heritage New Zealand Pouhere Taonga Act and Wildlife Act, which are explicitly listed in the FTAAt, and are consistent with the purpose and design of the Act (as well as other similar projects which have either already been listed or referred under the Act).

5.21. The Planning Memorandum (**Attachment 5**) outlines the approvals to be sought. The approvals include those under the Wildlife Act 1993 if protected species are identified within the site, and an Archaeological Authority and approval of a person to carry out an archaeological activity under the Heritage New Zealand Pouhere Taonga Act.

5.22. While regionally significant, the Project is not of a scale that is beyond the contemplation of the FTAA. It will not require the involvement of large numbers of commenters (for reasons that include there being few adjoining sites). There are a number of larger and more complex projects that are currently being processed through the fast track process.

5.23. The applicant has been actively engaging with relevant Māori entities and bodies (which is on-going) and all other entities that the FTAA identifies.

5.24. The Applicant's advisors are familiar with FTAA processes and will be able to efficiently meet the process requirements.

The Project will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (Referral Application Section 2.6.2.5)

5.25. The Project will increase the supply of housing, address housing needs, and will significantly contribute to addressing the issues for well-functioning urban environments in both Hamilton City and Waikato District.

5.26. Development within the Project Area will contribute to well-functioning urban environments as per Objective 1 of the National Policy Statement for Urban Development, including the required short, medium and long-term housing supplies that are required to be made available at all times within both Hamilton City and Waikato District.

5.27. The Project will deliver:

(a) Approximately 850 to 950 new dwellings/lots involving a range of typologies and housing options.

(b) Residential housing opportunities which will support the competitive operation of land and development markets.

(c) Good accessibility for future residents within the Project Area to Hamilton and its surrounds via Gordonton Road and the wider area via State Highway 1.

(d) Residential housing and some business opportunities (within the proposed neighbourhood centre and potentially live work units) which take into account the future impacts of climate change, through siting of vulnerable activities outside of hazard areas and provision for climate change factors in the design for stormwater infrastructure.

5.28. As above, the Project provides employment opportunities through construction works and resulting residential and commercial developments which will contribute to the achievement of well-functioning urban environments.

5.29. As identified in the Economic Assessment (**Attachment 15**) the proposal will make a substantial contribution to the operation of the greenfield residential land and development market, and overall urban housing market, in the Waikato Region.

5.30. The Economic Assessments identified that the Waikato market is currently constrained relative to future demand, and that there is a known residential capacity shortfall which was identified in the 2023 Housing and Business Capacity Assessment (HBA).

5.31. The HBA notes that "*there continue to be projected shortfalls (-2,800 dwellings) in capacity in the medium-term within the main urban centre of Hamilton*" (HBA, page 7), with capacity take-up "*significantly limited by infrastructure constraints across large parts of the suburban existing urban areas*" (HBA, page 7).

5.32. Specifically current and known pipeline greenfield developments in the Hamilton area alone only estimated to provide only approximately 8.8 years of demand. This indicates that the greenfield housing market is facing capacity and competition constraints, with limited remaining supply to support choice across locations, dwelling types, and price points. At present, there are only five existing and pipeline medium-large scale (i.e. 400+ dwellings) greenfield developments in Hamilton, which is unlikely to support a competitive housing market.

5.33. The proposal would add approximately 850 to 950 dwellings to the Hamilton housing market, comprising a mix of low-density stand alone, medium-density stand alone, and terrace/duplex dwellings. The proposal would increase identified greenfield capacity to approximately 10.0-10.2 years of greenfield demand and would therefore make a significant contribution toward a more efficient and competitive residential land and development market for the Waikato Region as whole.

5.34. The ability to provide for "self-servicing" assists in the applicants' ability to deliver the Project whereas, large parts of the suburban existing urban areas are significantly limited by infrastructure constraints (as identified by the HBA).

5.35. Well-functioning urban environments anticipate urban environments that are well-supported by infrastructure and additional infrastructure. The Project supports both the provision of infrastructure (such as water, wastewater, stormwater and roading) and community infrastructure including public open space and green corridor walkways. The Project also includes a neighbourhood centre to meet the day-to-day needs of residents.

5.36. Overall, the Project will increase the supply of housing, address housing needs, and contribute to well-functioning urban environments.

The Project will deliver significant economic benefits, (Referral Application Section 2.6.2.6)

5.37. Significant economic investments and impacts are outlined above in section 4 of this document and explained in the economics assessment prepared by Urban Economics provided as **Attachment 15**.

5.38. There will be direct benefits for construction workers and project managers, architects, engineers, landscapers, builders, and health and safety consulting service providers.

Economic benefits during construction

5.39. The Economic Assessment in Attachment 15 has assessed that the Project represents a total expenditure of around $181.9 million to GDP and supporting approximately 1,148 FTE jobs. When indirect effects are included, the total construction impact is estimated at approximately $355.6 million in GDP and 1971 FTE jobs This will include jobs in the construction phase which will provide other jobs and flow-on economic benefits. There will also be associated financial and development contributions for Waikato District Council, as well as an increased ratepayer base.

Economic benefits during operation

5.40. The Project will provide economic benefits during operation including through construction works and employment during that phase (such as jobs for service professionals in the local area).

5.41. Opportunities for employment are noted in paragraph 5.33 above. These employment outcomes will support economic resilience and growth across the Waikato region.

5.42. The Project is forecast to result in flow-on economic benefits to primary industries, including approximately $10 million in GDP and 6 FTE jobs.

5.43. Once complete, on-going household expenditure associated with the Project is estimated to generate approximately $45.2 million per annum, contributing approximately $25.1 million to GDP per annum and supporting 250 FTE jobs.

Other Economic Benefits

5.44. In addition to these quantifiable regional contributions, Urban Economics identifies that the Project is also expected to generate a wide range of qualitative economic benefits for the broader market and communities, including:

(a) increased regional residential capacity;

(b) increased and diversified choice of housing typology and location;

(c) potential for lower residential prices in the Waikato region;

(d) potential for more diversified economic composition;

(e) increased economic activity / local employment;

(f) impetus for greater levels of growth;

(g) increased amenity; and

(h) catalyst for investment in the area.

5.45. The economic benefits of the Project would extend well beyond the construction phase of the Project itself and would deliver a range of wider economic benefits that cumulate annually over the economic life of the assets. The Economics Assessment (**Attachment 15**) has confirmed that advancing the proposed development, given its scale, would yield economic benefits for the regional economy that are significant.

The Project will support climate change mitigation, including the reduction or removal of greenhouse gas emissions (Referral Application Section 2.6.2.9)

5.46. Once operational, the Project is expected to reduce the distance travelled by some residents to get to work, local services and retail (thus reducing Vehicle Kilometres Travelled and consequently CO^2 emissions from vehicles).

5.47. In addition, the Project intends, if practical, to:

(a) utilise local contractors as much as possible;

(b) utilise local suppliers as much as possible;

(c) utilise renewable energy solutions on buildings such as solar panels and EV charging; and

(d) eco-source the planting as far as practicable.

5.48. The Project will provide for active modes of transportation within the site (such as footpaths and cycleways) which can connect to Hamilton City's existing network for pedestrians and cyclists.

5.49. These cumulative reductions align with New Zealand's national carbon targets and contribute meaningfully to climate change mitigation.

The Project will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards (Referral Application Section 2.6.2.10)

5.50. The recent changes to the Waikato District Plan address the risk of hazards (at a high level). In this case, the Project Area is a significant distance from Waikato River and streams and WDC's planning maps do not identify it as being subject to any flood risk.

5.51. The Stormwater Memorandum in **Attachment 7** confirms that all stormwater devices to be utilised on the site will be designed to account for climate change and all building development will be designed to ensure appropriate separation from low-lying areas (such as minimum floor levels for habitable buildings).

5.52. The geotechnical assessment in **Attachment 9** identifies that the Project Area is suitable for urban development and that there are no concerns with respect to site stability or risk from any natural hazard. Earthworks and future development works would be undertaken to ensure that potential effects on land stability are minimised.

5.53. Site-specific details will be provided with the substantive application.

The project will address significant environmental issues (Referral Application Section 2.6.2.11)

5.54. Access to housing is a significant environmental issue. The delivery of around 850-950 allotments for dwellings of various types represents an increase in the overall residential capacity for the local and broader regional market and contributes to accommodating anticipated population growth.

5.55. The proposed increase in housing supply may lead to downward pressure on house prices, benefiting first home buyers and renters. This increase in supply would help create a more balanced housing market, making home ownership more attainable and easing the financial burden on renters.

6. PROJECT DETAILS

6.1. The following sections provide the required responses to the following matters:

- Section 3.0: For construction activities, please state the anticipated commencement and completion dates
- Section 3.1: Approvals Required

Commencement and Completion Dates (Referral Application Section 3.0)

6.2. The Applicant has funding for the delivery of the Project. It therefore has strong levels of control over the timing of the Project.

6.3. The Applicant will be able to carefully manage the design and quality of construction and is experienced in these areas.

6.4. Detailed design planning will begin immediately following referral of the application into the FTAA process. The final design and layout will be refined with technical input from a range of different expert consultants as the substantive application is finalised for submission.

6.5. Once consents are granted, pre-start conditions and management plans will be satisfied and complied with, so that earthworks could begin in the first available construction season, or at an earlier stage if Winter earthworks approvals can be obtained.

6.6. Construction of roading and infrastructure for delivery of lots will then begin following completion of earthworks to align with the sequencing outlined in the response to the Referral Application Section 3.2. and 3.2.1, this is expected to begin as soon as earthworks is complete with full completion of the Project expected in approximately 8-9 years.

Approvals Required (Referral Application Sections 3.1, 3.1.1, 3.1.3, 3.1.4, 3.1.6)

Approvals sought under the Resource Management Act 1991

6.7. The Project requires consents under the following sections of the RMA:

(a) Section 9: Land Use

(b) Section 11: Subdivision

(c) Section 13: River and lake beds

(d) Section 14: Water

(e) Section 15: Discharges

6.8. A fuller assessment of the individual consents sought under the Waikato District Plan, Waikato Regional Plan and relevant National Environmental Standards is contained in the Planning Memorandum in **Attachment 5**.

Approvals sought under the Reserves Act 1977

6.9. For the avoidance of doubt this Application does not seek any approvals under the Reserves Act approval) for use of, and works in, local purpose (esplanade) reserves.

Approvals sought under the Wildlife Act 1953

6.10. The Project may require approvals under the Wildlife Act 1953 if protected species are identified within the site, accordingly approvals will be sought under the Wildlife Act 1953.

Approvals sought under the Heritage New Zealand Pouhere Taonga Act 2014

6.11. The Project will require an Archaeological Authority and Approval of a person to carry out an archaeological activity under the Heritage New Zealand Pouhere Taonga Act 2014.

Other types of consents, certificates, designations, concessions, and other legal authorisations.

6.12. Works in the road reserve associated with infrastructure and upgrades will require engineering plan approval (EPA) and corridor access request (CAR) approval from Waikato District Council. These approvals occur after the issue of resource consent.

6.13. A licence to have private infrastructure (where wastewater or water supply pipes are not vested) within the road reserve is required under section 357(1) of the Local Government Act 1974. This authorisation is sought through Waikato District Council.

7. PROJECT STAGES

7.1. The following sections provide the required responses to the following matters:

- 3.2 Project Stages
- 3.2.*1 If the Project is planned to proceed in stages, provide:*

  A statement of ether the project is planned to proceed in in stages, including:

  a. an outline of the nature, scale and timing of the stages; and

  b. a statement of whether you intend to lodge a separate substantive application for each of the stages

  i. If a substantive application is intended to be lodged for each stage, address the questions under the section (Appropriateness for fast track approvals process) for each stage of the project.

7.2. The Project is to be consented in a single stage (and via one substantive application).

7.3. However, construction and the release of titles for subdivision will be "sequenced".

7.4. Sequencing will be based on detailed technical assessments, infrastructure investigations, and further design refinement as part of any substantive application. Final sequencing will be confirmed and determined through the substantive application process.

7.5. As only one substantive application will be lodged, there is no requirement to assess each delivery sequence against the questions identified under the section titled Appropriateness for fast track approvals process in the standard form template.

8. PERSONS AFFECTED

8.1. The following sections provide the required responses to the following matters:

- 3.5.1 Provide a list of persons, groups and/or entities who you consider are likely to be affected by the project;
- 3.5.2 Provide a summary of consultation undertaken with the above pesons and/or groups who you consider are likely to be affected by the project, and any other groups required to be consulted with under seciton 11 of the Act and how the consultation has informed the project
- 3.5.3 List any Treaty settlements that apply to the Project Area and provide a summary of the relevant principles and provisions in those settlements

Persons, Groups, Entities likely to be affected (Referral Application Section 3.5.1)

8.2. The persons, groups, or entities likely to be affected are as follows:

(a) The iwi authorities whose area of interest includes the area in which the Project is located are:

(i) Te Whakakitenga o Waikato Incorporated (Waikato-Tainui);

(ii) Ngati Haua Iwi Trust;

(iii) Ngati Wairere;

(iv) E Haa o te Whenua o Kirikiriroa (THaWK);

(v) Waikato Raupatu River Trust; and

(vi) Waikato River Authority.

(b) Waikato District Council;

(c) Waikato Regional Council;

(d) Hamilton City Council;

(e) IAWAI - Flowing Waters - a new publicly owned and joint Council-controlled organisation which, from 1 July 2026, will have the responsibility of building, managing and maintaining drinking water and wastewater services across Hamilton City and Waikato District.

(f) NZ Heritage Pouhere Taonga; and

(g) Department of Conservation.[2]

Summary of Consultation (Referral Application Section 3.5.2)

8.3. **Attachment 16** contains the summary of consultation undertaken by the Applicant. This summary addresses:

a) Consultation with WRC, WDC IAWAI, and HCC;

b) Consultation with other authorities and Administrative Agencies; and

c) Consultation with Mana Whenua.

8.4. The Applicant has satisfied all consultation requirements in sections 11 and 13 of the FTAA.

8.5. The applicant has contacted all relevant iwi authorities identified above as having an interest in the Project Area.

8.6. Waikato-Tainui has a protocol for FTAA referrals. Their preapplication form was completed and sent to them on 14 May 2026. The preapplication form provided a detailed assessment of the Project against the Vision and Strategy for the Waikato River and the relevant Iwi Management Plan.

8.7. A copy of the summary of the Project was sent to all the iwi authorities. A request was made to provide any feedback within **20 working days.**

8.8. The Applicant has been in contact with WDC and WRC in their role as regulators, and HCC as the site adjoins the territorial boundary. Feedback from these councils is set out in the consultation summary in **Attachment 16**.

8.9. The applicant has also consulted with the following administering agencies as outlined in **Attachment 16**:

(a) Heritage New Zealand Pouhere Taonga ("Heritage NZ") with;

(b) Department of Conservation ("DoC")

(c) Ministry for the Environment ("MfE")

How consultation has informed the Project (Referral Application Section 3.5.2)

8.10. Feedback received through consultation has shaped the Project so far. The **Attachment 16** summary identifies how the Project has responded to the feedback.

[2] Note that Transpower have not been identified as being likely affected as the proposal can proceed within the permitted activity limits of the Waikato District Plan in respect of works in vicinity to the transmission lines (and all building platforms and works can meet the relevant Electrical Codes of Practice and can be detailed at the substantive application stage. Furthermore, NZTA are similarly not identified as being directly adversely affected parties as the land falls outside the mapped Waikato District Plan overlay for acoustic attenuation from the state highway noise and there is no direct access on and off the state highway adjacent to the site).

Treaty Settlements (Referral Application Section 3.5.3)

8.11. There is one Treaty Settlement Statutory Acknowledgement Area identified within the Project Area or the surrounding neighbourhood. This relates to Ngāti Hauā and OTS-190-08, being the Waikato River and tributaries within the Ngāti Hauā Area of Interest. The Applicant has consulted with the Ngāti Hauā Iwi Trust.

8.12. The application falls within areas of interest covered by the following Treaty Settlements:

(a) Ngāti Hauā Claims Settlement Act 2014;

(b) Waikato-Tainui Raupatu Settlement Act 1995;

(c) Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010; and

(d) Ngati Tuwharetoa, Raukawa and Te Arawa River Iwi Waikato River Act 2010.

8.13. The relevant principles and provisions of these settlements are set out below.

Ngāti Hāua Claims Settlement Act 2014

8.14. The provisions of this Act acknowledge the statements of association for the statutory areas. The Waikato River is the statutory area that is relevant to the Project.

8.15. In accordance with section 36(2) of this Act, Ngāti Hauā's association is stated as follows:

"Waikato is our awa tapu (sacred river), our awa tupuna (ancestral river). It is our living taonga (a precious treasure) to the people of Ngāti Hauā. Ngāti Hauā is inextricably connected to the river through the ancestral ties of whakapapa which originated from the beginning of time, from the creation of the world when Ranginui (Sky Father) and Papatūānuku (Mother Earth) separated. That is when Tangaroa (Guardian of the Sea) flooded into the realm of daylight and brought nourishment to the world. This depicts the Ngāti Hauā worldview and highlights the importance of our waterways, its tributaries, and all that dwell within, to the people of Ngāti Hauā. This forms the foundation of Kaitiakitanga, which states that this taonga must be cherished and respected, and is a matter of great significance and priority, for the Ngāti Hauā people as guardians of the Waikato river.

The Waikato River was named by the ancestors of Tainui waka, of whom Ngāti Hauā descend. There is a well-known iwi legend which recounts the river Waikato being given as a gift hailing from Ruapehu maunga, by Tongariro, to his sick relative, Taupiri.

The Waikato River, and its region, has been populated for at least the past 700 to 800 years. The river provides physical and spiritual sustenance, and traditional healing powers for the people of Ngāti Hauā living along its catchment. The Waikato river is synonymous with mana, and Ngāti Hauā regard the awa as a source of mana, and an indicator of their own mauri, identity and wellbeing.

According to Ngāti Haua the Waikato River provided nutrients that enabled lands to remain fertile, thereby allowing areas of cultivation to flourish. These fertile areas yielded water fowl to reproduce aquatic foods such as fish and tuna, with the Ngāti Hauā region being known as 'Te rohe o te Tuna' (The land that was rich in tuna) in those times, right up to this present time. The tupuna Te Oro, originator of the hapū Ngāti Te Oro, was a grandson to Hauā, and he resided at Horotiu, on the banks of the Waikato River.

Ngāti Hauā are infinitely connected to the awa through the renowned chief, Te Waharoa, and his warriors, who fought at the significant battle of Taumatawiwi, at Karāpiro, on the Waikato River. In the lull of battle Te Waharoa burnt his fallen warriors there, which is the derivation of the name Karāpiro, karā meaning rock and piro from the putrid smell of the burning bodies."

8.16. The commentary against the Vision and Strategy (Te Ture Whaimana o Te Awa o Waikato) in the Planning Memorandum in **Attachment 5** is relevant to address the above.

Waikato-Tainui Raupatu Settlement Act 1995

8.17. The relevant provision of this Act is that it provides 'right of first refusal' on all Residual Crown Land. As none of the Project Area involves any such land, this Act has no bearing on this application.

Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010

8.18. This Act gives effect to the Deed of Settlement signed by the Crown and Waikato-Tainui on 17 December 2009. Its overarching purpose is to restore and protect the health and wellbeing of the Waikato River for future generations through a co-governance framework.

8.19. Section 9(2) of the Settlement Act confirms that the Vision and Strategy (Te Ture Whaimana o Te Awa o Waikato) applies to the Waikato River and activities within its catchment. As well as being deemed part of the RPS in its entirety pursuant to section 11(1), the Vision and Strategy prevails over any inconsistent provision in a national policy statement and sections 11 to 15 prevail over sections 59 to 77 of the RMA.

8.20. The Vision and Strategy (Te Ture Whaimana o Te Awa o Waikato) has been evaluated in the Planning Memorandum in **Attachment 5**.

Ngati Tuwharetoa, Raukawa and Te Arawa River Iwi Waikato River Act 2010

8.21. This Act complements the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010. It enables the people of Ngati Tuwharetoa, Raukawa and Te Arawa to participate with Waikato-Tainui in co-governance arrangements which aim to protect and restore the health of the Waikato River.

Unsettled Claims

8.22. The claims of Waikato-Tainui (within the Waikato/Auckland regions) are yet to be fully settled. Waikato-Tainui's remaining areas of interest are set out in the Waikato-Tainui Remaining Claims Mandate (March 2020). Waikato-Tainui and the Crown signed this Terms of Negotiation on 14 December 2020 to begin negotiations to settle remaining historical Treaty of Waitangi claims on behalf of Waikato-Tainui. This mandate document identifies that a number of claims are excluded – such as those in the Ngāti Hauā Claims Settlement Act 2014.

9. LEGAL INTERESTS

9.1. The following sections provide the required responses to the following matters:

- 3.6.1 Provide a description of any legal interests you or any others applying, have in the land on which the project will occur, including and statement of how that affects your ability to undertake the work.

9.2. The Project Area is owned by a sister company of the general partner of the limited partnership which is the registered owner of the land forming the Project Area (excluding the surrounding roads).

9.3. **Attachment 3** also contains a summary of all the registered interests on the Title and confirms that there are no interests registered on the titles of the land which would affect the delivery of the Project.

10. OTHER MATTERS

10.1. The following sections provide the required responses to the following matters:

- Section 3.7.1: Have the activities included in the project, or any that are substantially the same as those involved in the project, previously been the subject of an application or a decision under a specified Act?

- Section 3.7.4 Provide a description of whether and how the project would be affected by climate change and natural hazards

Previous Applications / Decisions (Referral Application Section 3.7.1)

10.2. None of the other proposed activities identified in this application/planning memorandum for the Project Area have previously been subject of an application or a decision under a specified Act. On this basis, there are no competing applications for the purposes of section 21(5)(g) of the FTAA.

How the project would be affected by climate change and natural hazards (Referral Application Section 3.7.4)

10.3. Climate change effects have been accounted for as identified in the Stormwater Memorandum in **Attachment 7**. Finished floor levels can be set for habitable buildings to ensure appropriate clearances from stormwater within low-lying areas.

10.4. Stormwater retention and detention measures will be incorporated so as to be consistent with the stormwater management approaches adopted by WDC and WRC. This will include pipe networks being sized in accordance with the RITS to convey the 10-year storm peak rainfall (including allowance for climate change) and safe conveyance of the 100-year storm to the drainage network, via roads or engineered overland flow paths.

10.5. The Project is supported by the geotechnical assessment provided in **Attachment 9**, which concludes that land is appropriate for urban development.

10.6. Site-specific details will be provided with the substantive application.