CLIENT
Horsham Downs Estate Ltd

25/06/2026

Economic and Property Research

Horsham Downs Residential Development, Hamilton

Fast-Track Approvals Act 2024
Economic Assessment

About us

Our Areas of Expertise

Economic Analysis

Our work aims to bridge the gap between land-use planning and urban economics. Our focus is on the interaction between land markets, land-use regulations, and urban development. We have developed a range of methodologies using a quantitative approach to analyse urban spatial structure and audit land-use regulations.

Property Research

We provide property and retail market research to assist with the planning and marketing of new projects. This includes the identification of new sites and market areas, assessments of market potential and positioning, and the evaluation of market feasibility of specific projects.

Development Advisory

We provide development planning and costing advisory services to support small and large-scale developments.

Disclaimer

This document has been completed, and services rendered at the request of, and for the purposes of the client only. The report is also available for the purposes of the Minister for Infrastructure in determining whether to refer the project to the fast track approvals process and the Environmental Protection Authority and the panel. Urban Economics has taken every care to ensure the correctness of and reliability of all the information, forecasts and opinions contained in this report. All data utilised in this report has been obtained by what Urban Economics consider to be credible sources, and Urban Economics has no reason to doubt its accuracy. Urban Economics shall not be liable for any adverse consequences of the client's decisions made in reliance of any report by Urban Economics. It is the responsibility of all parties acting on information contained in this report to make their own enquiries to verify correctness. © 2026 Urban Economics Limited. All rights reserved.

Contents

1. Executive Summary 4

2. Introduction 6
   2.1 Qualifications and Experience 6
   2.2 Code of Conduct 7
   2.3 The Proposal 7

3. Study Area 9

4. Greenfield Residential Capacity Analysis 10

5. Greenfield Residential Demand & Sufficiency Analysis 12
   5.1 Dwelling Sales 12
   5.2 Hamilton City Dwelling Demand 14
   5.3 Dwelling Consents by Location 15
   5.4 Greenfield Residential Demand Analysis 17

6. Affordability of New Greenfield & Infill Housing 18
   6.1 Hamilton City Average House Price Growth 2005-2024 19

7. Hamilton City Population Growth 20

8. Access to Employment Nodes & Services 20

9. Hamilton City Infrastructure Provision 22

10. Rural Economic Value of Development Site 22

11. Economic Contribution to GDP & Employment 23
    11.1 Construction GDP & Employment Contribution 24
    11.2 Employment & GDP Generation from Ongoing Expenditure 26

12. Greenfield Development Sale Rate Analysis 27

13. Fast-track Approvals Act Economic Considerations 28

14. Economic Costs and Benefits Summary 30

15. Conclusion 32

1. Executive Summary

The proposed residential development at 319 Gordonton Road represents a significant greenfield housing proposal on the north-eastern edge of Hamilton's urban area.

At a high level, the Project seeks to enable the following activities:

- Residential development and subdivision to provide for approximately 850-950 delivering a mix of housing typologies to support a range of household types, life stages, and affordability outcomes. It is intended that most dwellings/lots will contain stand alone, duplex or terrace dwellings, but at this stage the scope of the proposal is intended to cover all forms of residential activity irrespective of how it might be defined in the district plan;
- A neighbourhood centre located and designed to provide 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;
- An open space and green–blue network, incorporating low-lying areas, a neighbourhood park, landscape buffers that enhance amenity and ecological outcomes.

The development would enable a mix of lot sizes that supports a diverse range of housing types and price points, with an estimated average sale price of approximately $820,000. This includes average prices of approximately $760,000 for terrace/duplex dwellings, $880,000 for medium-density standalone dwellings, and $1.025 million for larger standalone dwellings based on the current market, though pricing may vary at the time the dwellings are available to the market.

Hamilton is one of New Zealand's key high-growth urban centres and is the pre-eminent centre within the Waikato Region, forming an important connected node with strong transport and business links to Auckland and Tauranga. Its population increased from approximately 120,500 people in 2000 to 192,100 in 2025, representing growth of 59%, compared with national growth of approximately 38% over the same period. This sustained growth is driving continued demand for additional housing capacity. The Waikato Region increased from approximately 368,100 people in 2000 to 532,100 in 2025, meaning Hamilton City accounted for just under half of all growth in the region.

The 2023 Housing and Business Capacity Assessment identifies medium-term demand for approximately 15,200 additional dwellings in Hamilton City, including the NPS-UD demand buffer. It also identifies projected medium-term capacity shortfalls in Hamilton, with capacity take-up constrained by infrastructure limitations across large parts of the existing urban area. In this context, additional greenfield capacity has an important role in supporting housing supply, choice, and market responsiveness.

The proposal would therefore assist in addressing the medium-term housing capacity shortfall identified in the HBA, including the projected shortfall of approximately 2,800 dwellings within the Hamilton main urban centre.

Current and known pipeline greenfield developments are estimated to provide approximately 8.8 years of greenfield demand. This indicates that the Hamilton greenfield housing market is facing capacity and competition constraints, with limited remaining supply to support choice across locations, dwelling types, and price points. The proposal would increase identified greenfield capacity to approximately 10.0-10.2 years of greenfield demand, representing a material contribution to the efficiency and competitiveness of the greenfield housing market. Additionally,

the proposal is well positioned geographically to provide housing choice and competition within the Waikato region.

The proposal would deliver an estimated 70 dwellings per annum, equivalent to approximately 10% of estimated annual greenfield dwelling demand and would represent the fourth largest identified current or pipeline greenfield development in the Hamilton market.

The proposal is also well located relative to Hamilton's employment base. The city accommodated approximately 105,100 jobs in 2025, with employment growth broadly keeping pace with population growth over the last decade. The site is located on the edge of Hamilton within approximately 15–20 minutes' peak hour drivetime of several major employment nodes, including the city centre, Te Rapa employment area, and Ruakura Superhub. This supports a well-functioning urban environment by enabling additional housing within reasonable proximity of Hamilton's main employment and service areas.

The proposal would generate substantial economic benefits. During construction, it is estimated to enable a $598.8 million development, directly 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 2,014 FTE jobs.

Once complete, ongoing household expenditure associated with the proposal is estimated to generate approximately $45.2 million in expenditure per annum, contributing approximately $25.1 million to GDP per annum and supporting approximately 250 FTE jobs. The proposal would also help fund growth-related infrastructure upgrades required to support continued urban growth through increased development contributions and additional rateable units, if it is connected to the council reticulation.

The proposal would displace the existing rural use/potential of the site, which is estimated as being suitable for dairy farming. This dairying use would contribute approximately $0.2 million to GDP per annum and support approximately 2 FTE jobs. This loss is not considered to be sufficiently significant to be out of proportion to the proposal's regional benefits.

Fast-track Approvals Act and National Policy Statement on Urban Development 2020 Assessment

The proposal is considered to meet the purpose of the Fast-track Approvals Act, as set out in Section 3, which is to facilitate projects that deliver significant regional or national benefits, and satisfies the relevant economic matters in Section 22(2)(a), including whether the project will increase housing supply, address housing needs, or contribute to a well-functioning urban environment; deliver significant economic benefits; and support primary industries. In particular:

- **Section 22(2)(a)(iii) – Housing and well-functioning urban environment:**
  The proposal would deliver a significant increase in housing supply in a constrained greenfield market. It would provide a broad mix of dwelling types and price points, improve housing choice, and support the competitive operation of the residential land and development market. It will therefore help the local community and the region to provide for its economic wellbeing by providing increased housing choice in a sought after location within the Waikato region, allowing them to make efficient choices about where they live in relation to their other day to day commitments. The site is also well placed strategically to make efficient use of the arterial transport network without overloading it, provided that the recommendations of the transport engineer are adopted. On this basis, the proposal would make a significant contribution towards a well-functioning urban environment.
- **Section 22(2)(a)(iv) – Significant economic benefits:**
  The proposal would deliver significant economic benefits, including approximately $181.9 million in direct GDP and 1,148 FTE jobs during construction. Including indirect effects, the

construction phase is estimated to generate approximately $355.6 million in GDP and support 2,014 FTE jobs. The proposal would also generate ongoing annual economic benefits through household expenditure.

- **Section 22(2)(a)(v) – Support primary industries:**
  The proposal would support primary industries through construction-related supply chain activity, including approximately $10.2 million in GDP and 6 FTE jobs associated with primary sector inputs such as timber and aggregates. This would exceed the current economic contribution of the site under dairy farming.

Overall, the proposal is considered to deliver significant regional economic and urban development benefits. It would increase housing supply in a constrained greenfield market, improve housing choice, support a well-functioning urban environment, generate substantial construction and ongoing economic benefits, and contribute to Hamilton's continued growth. On this basis, the proposal is considered to meet the economic requirements of the Fast-track Approvals Act 2024.

2. Introduction

This report evaluates a proposed residential development ("the proposal") located at 319 Gordonton Road, Hamilton, against the purpose (Section 3) and Section 22(1)(a) of the Fast-track Approvals Act 2024 (FTAA).

2.1 Qualifications and Experience

The authors of this report (the "authors") are Adam Thompson and Conor Whyte.

Adam Thompson is the Director of Urban Economics (UE) Limited, who has over 25 years of experience providing consulting services in urban economics, property market analysis, and property development advisory. Over the past 23 years, Adam Thompson has owned and managed two consulting firms operating in these fields and holds a Bachelor of Resource Studies from Lincoln University, a Master of Planning from the University of Auckland, and a Dissertation in Urban Economics from the London School of Economics and Political Science. Adam Thompson has undertaken more than 2,500 economic and property market assessments for a wide range of private and public sector clients, and notably, was a primary developer of the Auckland Council Development Capacity Model (2016) on request of the AUP IHP Chair (Judge Kirkpatrick) and conducted a review of all Housing and Business Assessments under the National Policy Statement on Urban Development for the Ministry for the Environment (2021).

Conor Whyte is a senior economic and property researcher at UE, with over 5 years of experience providing consulting services in urban economics, property market analysis, and property development advisory. Conor Whyte holds a Bachelor of Commerce from the University of Auckland, with majors in Economics and Management. During his time at UE, Conor Whyte has undertaken over 250 economic and property market assessments for a wide range of private and public sector clients.

As a company, UE has delivered insightful economic analysis and property research to property developers, industry partners and government agencies across New Zealand for over 20 years, ensuring they are well-informed with the necessary knowledge and evidence for the present and future. UE has a proven track record of providing economic and property market advisory services for approximately:

- 200+ expert evidence briefs,
- 100+ new housing developments,

- 50+ new retirement villages,
- 2000+ new retail stores,
- 100+ new mixed-use commercial developments,
- 50+ Fast-track Economic Assessments under the COVID-19 Recovery (Fast-track Consenting) Act 2020, and
- 10 Fast-track Economic Assessments under the Fast-track Approvals Act 2024.

2.2 Code of Conduct

Although this is not a hearing before the Environment Court, the authors record that they have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and agrees to comply with it.

The authors confirm that the issues addressed in this report are within the author's area of expertise, except where the authors state they have relied on the information of other persons. The authors have not omitted to consider material facts known to them that might alter or detract from the opinions the author has expressed.

2.3 The Proposal

The site and indicative development concept are illustrated in Figures 1 and 2. The proposal comprises a large-scale residential development on the north-eastern edge of Hamilton's urban area. As outlined in Figure 2, the Project seeks to enable the following activities:

- Residential development and subdivision to provide for approximately 850-950 delivering a mix of housing typologies to support a range of household types, life stages, and affordability outcomes. It is intended that most dwellings/lots will contain stand alone, duplex or terrace dwellings, but at this stage the scope of the proposal is intended to cover all forms of residential activity irrespective of how it might be defined in the district plan;
- A neighbourhood centre located and designed to provide 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. Typical neighbourhood centres in masterplanned developments range between approximately 1,000 and 4,000 sqm. For a development of 850 to 950 dwellings it is estimated that the proposed centre would comprise approximately 1,500 sqm of convenience floorspace to service residents;
- An open space and green–blue network, incorporating low-lying areas, a neighbourhood park, landscape buffers that enhance amenity and ecological outcomes.

At 850 to 950 dwellings, this would make the proposal the fourth largest development in Hamilton City over the medium term (i.e. next decade).

The proposal provides a broad mix of lot sizes. This supports a diverse range of housing types and price points within the proposal.

The estimated average sale price across the proposal is approximately $820,000, with prices ranging from approximately $760,000-$1,025,000. This will provide a significant supply of new housing at relatively affordable price points within the Hamilton market, when compared against the average house price over the last two years.

Figure 1:
Proposed Development Masterplan (21/04/26)



Source: Earl Design

Figure 2:
Proposal Indicative Dwelling Composition & Price

Development Component	Dwelling / Lot Count	Residential Lot Size Range / Centre GFA (m^2)	Estimated House Price		
			Low	Average	High
Residential	850-950	185 - 650	$760,000	**$820,000**	$1,025,000
Neighbourhood Centre	-	1,500		-	

Source: Earl Design, Cotality, UE

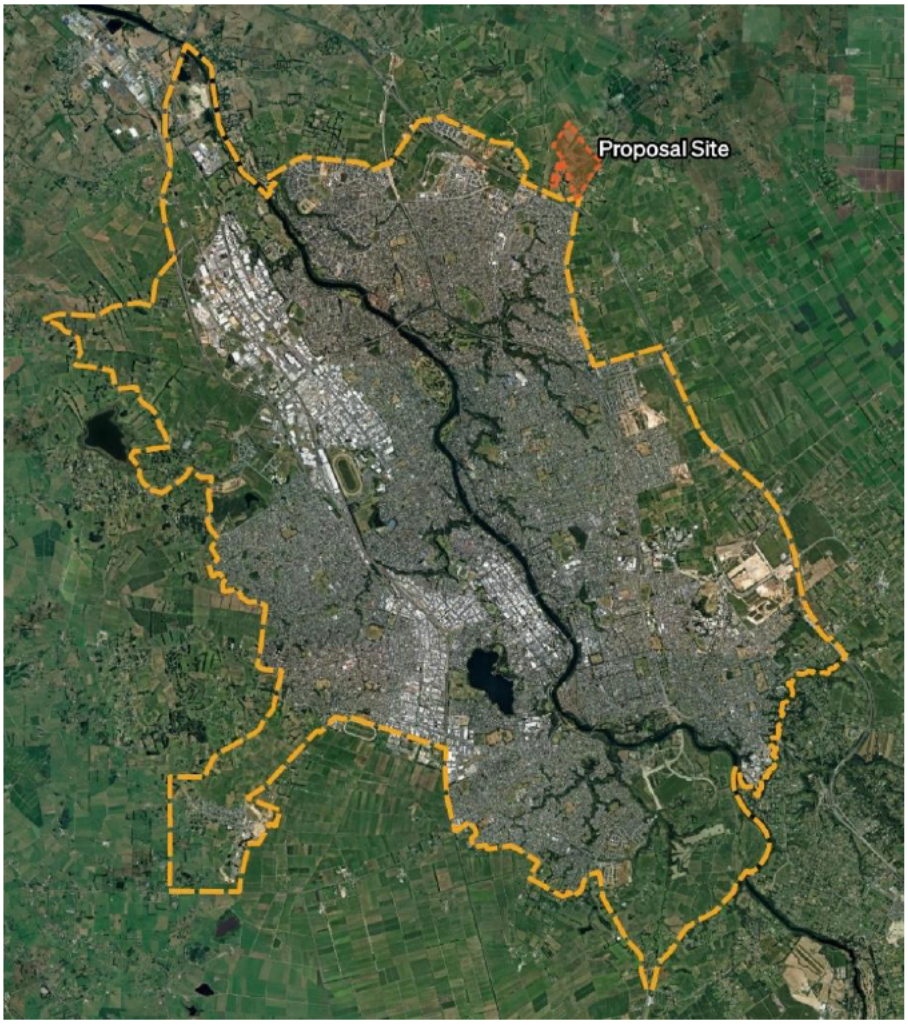
3. Study Area

Figure 3 defines the study area adopted for this assessment, which aligns with the Hamilton City Territorial Authority boundary.

The site is located within the Waikato Region and is effectively an expansion of Hamilton's main urban area. As such, Hamilton's main urban area (approximately the Hamilton City boundary) is considered an appropriate spatial area for assessing residential demand, supply, affordability, and market sufficiency. In this regard, the Hamilton City Council Housing and Business Assessment, is relevant market context for the proposal.

It is acknowledged that the FTAA requires benefits to be assessed at a regional or national scale, and in this regard, contributions to the Hamilton main urban area are also contributions to the Waikato regional economy, particularly given Hamilton's significance within the regional context. Accordingly, additional housing supply in this location would support the wider regional urban housing and labour markets, including through improved housing choice and affordability.

Figure 3:
Study Area (Hamilton City)



Source: LINZ, Google

4. Greenfield Residential Capacity Analysis

This section profiles the existing and pipeline medium-large scale (50+ lots/dwellings) greenfield developments (i.e. capacity) with remaining capacity in the study area.

Figures 4 and 5 provide a profile of current and pipeline greenfield developments within Hamilton City[1]. This reflects the medium-term (10 year) 'reasonably expected to be realised' greenfield capacity in the study area, as it relates to the developments that are zoned, serviced and expected to be delivered over this period.

The medium-term capacity is considered the most relevant period for assessing whether the housing market is likely to function efficiently and meet demand in terms of dwelling type, price, and location.

The main points are:

- There are currently eight greenfield developments supplying lots or dwellings within the study area. These are expected to provide approximately 5,535 dwellings/lots in total, of which 4,356 remain to be developed or sold. See figure 5 below for comparative location of these developments.
- Current developments have achieved approximately 1,179 sales to date, equating to around 21% of total expected yield.
- There are two known pipeline developments, Amberfield and Rotokauri Rise, which are expected to provide a further 1,733 dwellings/lots, with 1,602 remaining. Rotokauri Rise has been treated as pipeline supply, as its first release sold out over the 2018–2019 period and the timing of subsequent stages being brought to market is currently unclear.
- Overall, current and known pipeline greenfield developments are expected to provide approximately 7,268 dwellings/lots, of which 5,958 remain available.
- The proposal would add a further 850 to 950 dwellings, increasing total identified greenfield capacity to approximately 8,118 – 8,218 dwellings/lots, with 6,808 – 6,908 dwellings/lots remaining.
- While this represents a significant amount of identified capacity, it is distributed across a limited number of developments and will be delivered progressively over time. The proposal therefore represents a significant addition to the greenfield development pipeline, particularly in the north-eastern part of Hamilton's urban area.
- Larger-scale greenfield developments make up only a small share of Hamilton's identified pipeline, with just five current or planned projects exceeding 400 dwellings/lots. At 850 to 950 dwellings, the proposal would be the fourth largest greenfield development in Hamilton over the medium term, representing a material addition to future greenfield housing supply.

[1] Development of largely vacant land, informed by publicly available information and sources (i.e. development websites, news articles, council plan changes, etc.).

Figure 4:
Hamilton City Existing & Pipeline Greenfield Development Dwelling Supply

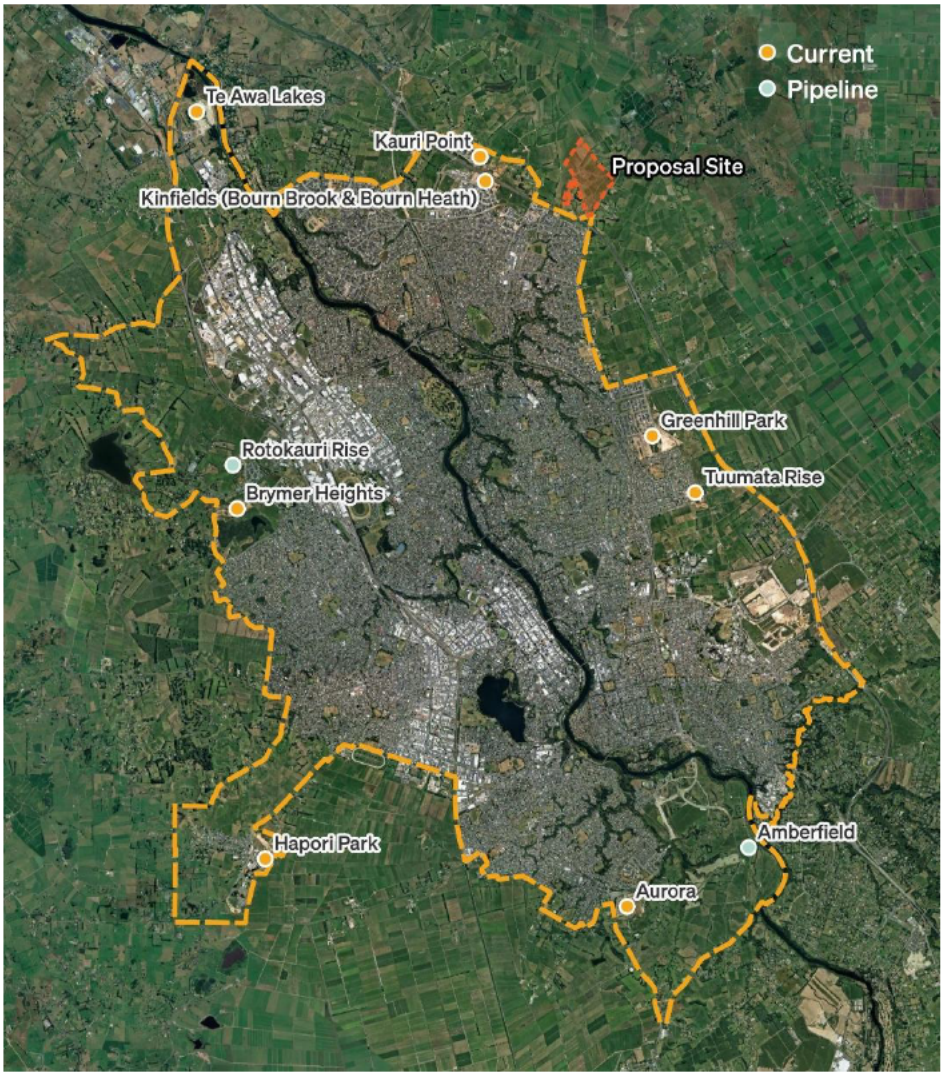
Status	Development	Total Dwellings / Lots	Sold	%Sold	Currently Selling	Remaining Supply
Current	Greenhill Park	1,800	810	45%	19	990
	Aurora	450	160	36%	22	290
	Brymer Heights	196	12	6%	32	184
	Te Awa Lakes	2,500	0	0%	23	2,500
	Tuumata Rise	74	22	30%	9	52
	Hapori Park	280	60	21%	4	220
	Kinfields*	151	63	42%	88	88
	Kauri Point	84	52	62%	4	32
	Sub-total	**5,535**	**1,179**	**21%**	**201**	**4,356**
Pipeline	Amberfield	833	-	-	-	833
	Rotokauri Rise**	900	131	15%	-	769
	Sub-total	**1,733**	131	8%	-	**1,602**
Total Current + Pipeline		**7,268**	**1,310**	**18%**	**201**	**5,958**
The Proposal		**850-950**	**-**	**-**	**-**	**850-950**
Total + Proposal		**8,118-8,218**	**1,310**	**16%**	**201**	**6,808-6,908**

Source: Developer Websites, TradeMe, Cotality, UE

*Relates to Bourn Brook & Bourn Heath stages. No public information on future stage dwelling yields.

**First release sold. Subsequent stages are expected to be developed over the medium term.

Figure 5:
Location of Hamilton City Existing & Known Pipeline Greenfield Developments



Source: LINZ, Cotality, Developer Websites, Google, UE

5. Greenfield Residential Demand & Sufficiency Analysis

This section provides an assessment of greenfield residential demand within the study area, including recent dwelling sales, projected dwelling demand, the spatial distribution of dwelling consents, and the sufficiency of remaining greenfield capacity.

The assessment focuses on the extent to which identified greenfield capacity is likely to meet demand in terms of quantity, dwelling type, price point, and location.

5.1 Dwelling Sales

Figure 6 outlines recent dwelling and vacant lot sales in Hamilton City by price bracket and property type over the May 2024 to May 2026 period. The main points to note are:

- Stand alone dwellings accounted for the majority of sales, representing approximately 71% of all sales, followed by terrace dwellings at 26%. Apartments accounted for a relatively small share of sales at approximately 1%, while vacant lots accounted for approximately 2% (as most new dwellings are sold as home and land packages).
- The majority of stand alone dwelling sales occurred between $600,000 and $1,000,000, with the largest shares in the $700,000–$800,000 and $800,000–$900,000 price brackets. The proposal is therefore relatively affordable within the context of the stand alone housing market.
- Terrace dwellings were concentrated at lower price points, with most sales occurring between $400,000 and $700,000. This indicates that terrace housing is playing an important role in providing relatively more affordable, albeit smaller, ownership options within Hamilton.
- Vacant lot sales were also concentrated at lower price points, with most sales occurring below $500,000.
- Over the period, there were approximately 6,680 sales across the study area, including 4,760 stand alone dwellings, 1,725 terrace dwellings, 50 apartments, and 145 vacant lots
- The average sale price across all sales was approximately $780,000. Stand alone dwellings achieved the highest average sale price at approximately $855,000, compared to approximately $605,000 for terrace dwellings, $570,000 for apartments, and $540,000 for vacant lots.

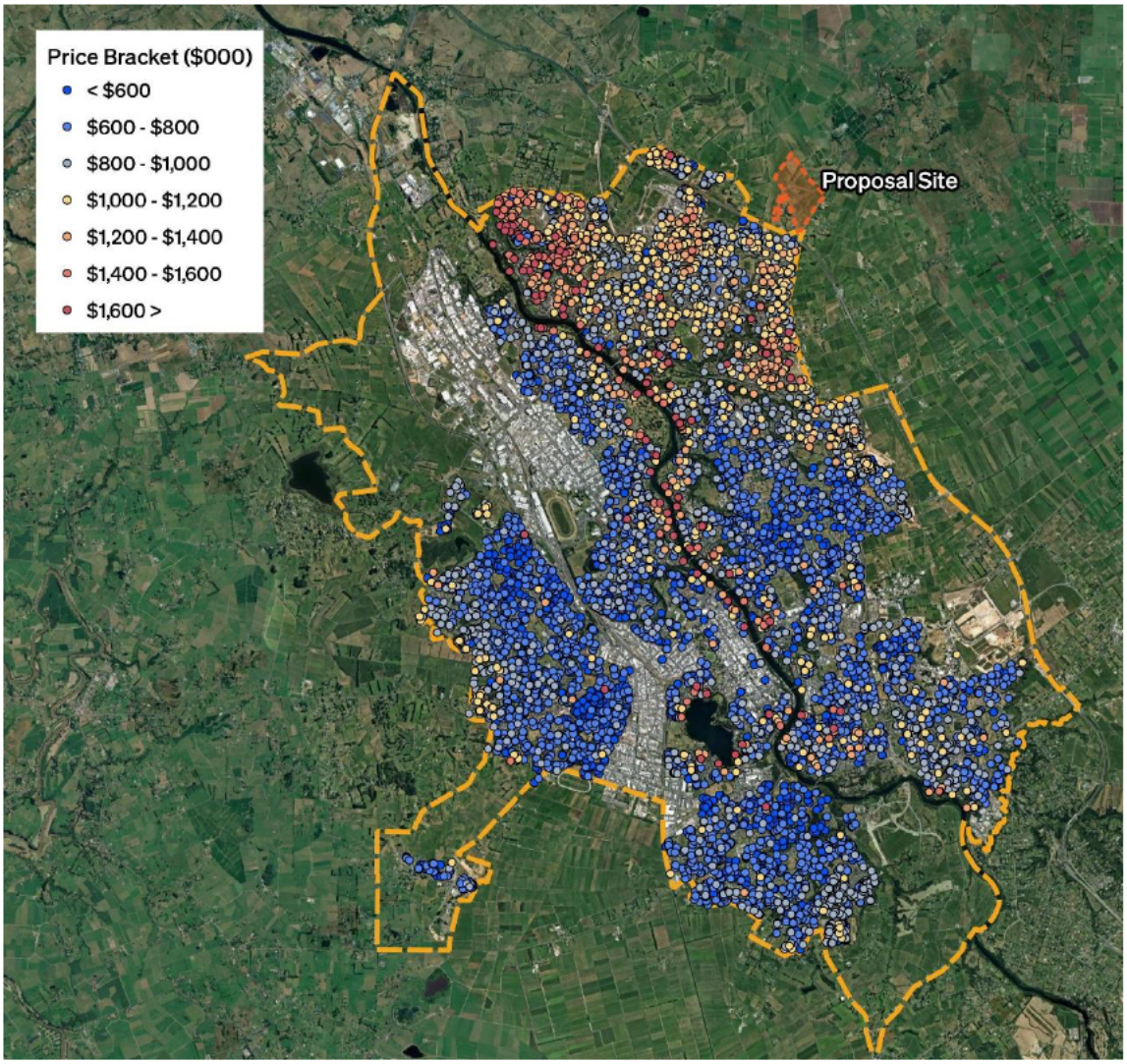
Figure 6:
Study Area Recent Sales by Price Bracket (May 2024 – May 2026)

Price Bracket ($000)	Number of Properties					Percentage Distribution				
	Stand Alone	Terrace	Apartment	Vacant Lot	Total	Stand Alone	Terrace	Apartment	Vacant Lot	Total
<$400	95	110	10	60	275	2%	6%	20%	41%	4%
$400 - 500	70	280	15	35	400	1%	16%	30%	24%	6%
$500 - 600	330	550	10	15	905	7%	32%	20%	10%	14%
$600 - 700	860	460	10	5	1,335	18%	27%	20%	3%	20%
$700 - 800	1,025	205	5	5	1,240	22%	12%	10%	3%	19%
$800 - 900	820	60	0	10	890	17%	3%	0%	7%	13%
$900 - 1,000	600	20	0	5	625	13%	1%	0%	3%	9%
$1,000 - 1,100	345	15	0	5	365	7%	1%	0%	3%	5%
$1,100 - 1,200	215	10	0	5	230	5%	1%	0%	3%	3%
$1,200 - 1,300	145	5	0	0	150	3%	0%	0%	0%	2%
$1,300 - 1,400	95	5	0	0	100	2%	0%	0%	0%	1%
$1,400 - 1,500	55	0	0	0	55	1%	0%	0%	0%	1%
$1,500 - 1,600	30	5	0	0	35	1%	0%	0%	0%	1%
$1,600 - 1,700	20	0	0	0	20	0%	0%	0%	0%	0%
$1,700 - 1,800	20	0	0	0	20	0%	0%	0%	0%	0%
$1,800 - 1,900	15	0	0	0	15	0%	0%	0%	0%	0%
$1,900 - 2,000	5	0	0	0	5	0%	0%	0%	0%	0%
$2,000 - 2,100	5	0	0	0	5	0%	0%	0%	0%	0%
$2,100 - 2,200	0	0	0	0	0	0%	0%	0%	0%	0%
$2,200 - 2,300	0	0	0	0	0	0%	0%	0%	0%	0%
$2,300 - 2,400	0	0	0	0	0	0%	0%	0%	0%	0%
$2,400 - 2,500	0	0	0	0	0	0%	0%	0%	0%	0%
$2,500 Plus	10	0	0	0	10	0%	0%	0%	0%	0%
Total	**4,760**	**1,725**	**50**	**145**	**6,680**	**71%**	**26%**	**1%**	**2%**	**100%**
Avg Sale Price	**$855,000**	**$605,000**	**$570,000**	**$540,000**	**$780,000**	-	-	-	-	-

Source: Cotality, UE

Figure 7 shows the spatial distribution of recent dwelling sales across Hamilton City. Lower-priced sales are generally concentrated in the southern and western parts of the city, where a larger share of dwellings sold below $800,000. Higher-priced sales are more concentrated in the northern and north-eastern parts of Hamilton, including areas near the proposal site, where a greater share of sales exceeded $1.0 million. This indicates that the proposal is well located within Hamilton's northern/north-eastern housing market, where recent sales evidence shows sustained demand across a range of price points. Additional housing supply in this location would therefore support market responsiveness and housing choice in a 'high demand' part of the city's residential market.

Figure 7:
Hamilton City Recent Sales Map (May 2024 – May 2026)



Source: Corelogic

5.2 Hamilton City Dwelling Demand

Figure 8 summarises Hamilton City's projected dwelling demand over the medium-term (1-10 years), as reported in the 2023 Housing and Business Capacity Assessment (HBA).

The HBA identifies medium-term demand for approximately 12,600 additional dwellings in Hamilton City over the 2022-2032 period, equating to approximately 1,260 dwellings per annum.

With the NPS-UD demand buffer applied, to achieve an efficient market, this increases to approximately 15,200 dwellings, or 1,520 dwellings per annum.

It should be noted that the HBA identifies broader residential capacity and affordability constraints within Hamilton, noting that that *"there continue to be projected shortfalls (-2,800 dwellings) in capacity in the medium-term within the main urban centre of Hamilton"* (page 7), with capacity take-up *"significantly limited by infrastructure constraints across large parts of the suburban existing urban areas"* (page 7). This reinforces the importance of additional residential capacity that can contribute to Hamilton's medium-term housing needs, particularly given the constraints affecting infill and redevelopment capacity within existing urban areas, as identified in the HBA.

Figure 8:
Hamilton City 2023 HBA Medium-Term Dwelling Demand (2022-2032)

Medium-Term Dwelling Demand	Additional Dwellings	
	Base	Base + NPS-UD Demand Buffer*
Annualised	1,260	1,520
Total	12,600	15,200

Source: Hamilton City 2023 HBA (Table 6-33, page 143)

*Including NPS-UD demand buffer of 20% for the medium-term.

5.3 Dwelling Consents by Location

Figure 9 provides a breakdown of the location of new dwellings consented in the study area over the 2016-2025 period. It shows that, on average, approximately 60% of new dwellings consented over this period were located in infill areas, while 40% were located in greenfield areas. The greenfield share was higher over the 2016–2020 period, averaging approximately 43%, compared with approximately 36% over the 2021–2025 period.

Recent consent activity has been affected by weaker housing market conditions. Nationally, new dwelling consents reduced by approximately 22% over the 2020-2022 and 2023-2025 periods. In Hamilton City, the decline was more pronounced, with consents reducing by approximately 34% over the same period. This suggests that recent consent patterns may understate underlying greenfield demand, particularly where larger-scale greenfield projects are more exposed to financing, infrastructure, and development contribution constraints.

A recent Environment Court decision on Private Plan Change 73[2] identified several key areas where the Auckland HBA does not meet the requirements of the NPS-UD. The decision noted that *"The Court would question the relevance of such data sets [household and population growth data], if they do not identify and distinguish greenfield-based trends and patterns over time from infill-based trends and patterns over time. In this regard, the practice of averaging household growth data over periods of time can mask relevant detail."* [208]. This is directly relevant to the Hamilton City HBA, which does not identify dwelling demand in terms of the infill-greenfield split.

To inform greenfield demand in the study area, a greenfield share of 45% has been applied to total medium-term dwelling demand estimated in the latest HBA This is broadly consistent with the 2016-2020 pre-COVID greenfield consent share of approximately 43%, while recognising that

[2] *Gardon Trust v Auckland Council* [2023] NZEnvC 058.

recent consent activity has likely been affected by weaker housing market conditions and constrained greenfield land availability. The pre-COVID period is therefore considered to provide a more reliable indication of underlying greenfield market demand than the lower 2021–2025 average. This results in estimated annual greenfield demand of approximately **680 dwellings over the medium term**, including the NPS-UD demand buffer (i.e. 45% of HBA demand of 1,520 dwelling p.a.).

In many other urban centres across the country, and historically, greenfield housing has typically accounted for around 60-70% of dwelling demand. This reflects the role of greenfield development in providing larger-scale housing supply, often at more affordable price points than comparable infill development. In this context, the lower greenfield share observed in Hamilton is considered likely to reflect constrained greenfield land availability and recent market conditions, rather than underlying demand preferences alone. As such, the adopted 45% greenfield demand share is considered to be conservative.

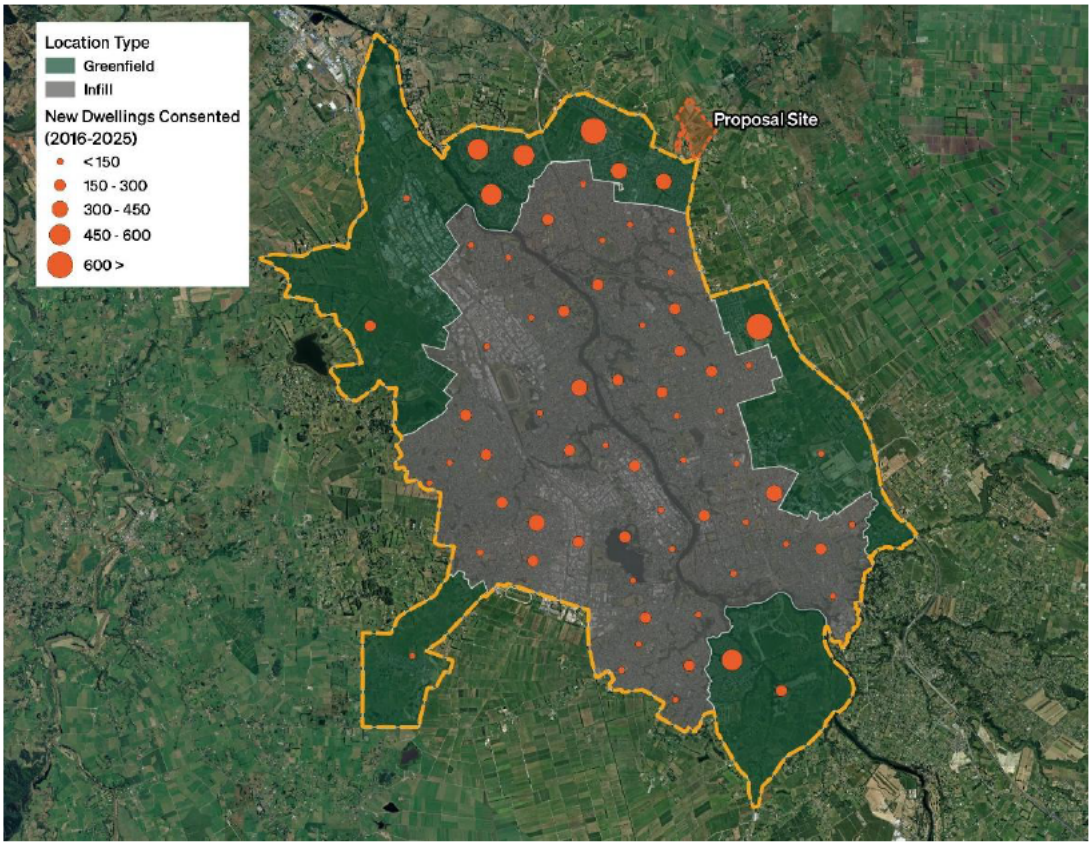
Figure 9:
Hamilton City New Dwellings Consented by Location (2016-2025)

Year	New Dwellings Consented			%	
	Infill	Greenfield*	Total	Infill	Greenfield*
2016	570	610	1,180	48%	52%
2017	730	410	1,140	64%	36%
2018	830	660	1,490	56%	44%
2019	1,030	660	1,690	61%	39%
2020	750	660	1,410	53%	47%
2021	990	760	1,750	57%	43%
2022	990	450	1,440	69%	31%
2023	960	320	1,280	75%	25%
2024	550	340	890	62%	38%
2025	520	360	880	59%	41%
2016-2020 Avg	**780**	**600**	**1,380**	**57%**	**43%**
2021-2025 Avg	**800**	**445**	**1,245**	**64%**	**36%**
2016-2025 Avg	**790**	**525**	**1,315**	**60%**	**40%**

Source: Statistics NZ, LINZ, UE

*SA2's where residential growth has predominantly occurred through greenfield developments.

Figure 10:
Location of New Dwelling Consents in Hamilton City (2016-2025)



Source: Statistics NZ, UE

5.4 Greenfield Residential Demand Analysis

Based on the findings in Sections 4 and 5, Figure 11 estimates the extent to which identified greenfield dwelling capacity is sufficient to meet estimated annual greenfield demand in the study area.

Annual greenfield dwelling demand is estimated at approximately 680 dwellings per annum, including the NPS-UD demand buffer, to support an efficient market. This is based on applying the 45% greenfield demand share identified in Section 5.3 to total medium-term dwelling demand for Hamilton City, as identified in the 2023 HBA.

Current and known pipeline greenfield developments are estimated to provide approximately 5,960 remaining dwellings/lots. Based on annual greenfield demand of approximately 680 dwellings, this equates to approximately 8.8 years of remaining identified greenfield capacity[3].

The proposal would add a further 850 to 950 dwellings, increasing total identified greenfield capacity to approximately 6,808-6,908 remaining dwellings/lots. This would increase identified greenfield capacity to approximately 10.0-10.2 years of greenfield demand.

It should be noted that this assessment is used as an indicator of housing market efficiency and competition, rather than as a standalone test of whether the proposal meets any specific statutory threshold, such as NPS-UD Policy 1 and 2. The current estimate of less than 10 years of greenfield

[3] It is noted that there may be other fast-track applications or plan changes that occur over this period., These may be relevant to assess as part of the substantive application.

supply indicates that the Hamilton greenfield housing market is facing capacity and competition constraints, with limited remaining supply to support choice across locations, dwelling types, and price points (a general conclusion also reached by the HBA for total housing). The proposal would not, by itself, resolve these constraints, but would make a material contribution toward a more efficient and competitive greenfield housing market by increasing the amount of supply available to the market and improving the ability of the market to respond to demand over the medium term.

Figure 11:
Study Area Estimated Greenfield Dwelling Sufficiency

Greenfield Areas	Total
Annual Demand Dwelling Demand (incl. NPS-UD Demand Buffer)*	680
Remaining Medium-Term Capacity (Current + Pipeline Developments)	5,960
Remaining Medium Term Capacity (Current + Pipeline + Proposal)	6,808-6,908
Remaining Years of Capacity (Current + Pipeline)	**8.8**
Remaining Years of Capacity (Current + Pipeline + Proposal)	**10.0-10.2**

Source: Hamilton City 2023 HBA, UE

*45% of total dwelling demand.

6. Affordability of New Greenfield & Infill Housing

Housing in new greenfield developments is typically able to be brought to the market at lower prices than new infill housing, both in terms of its nominal and per sqm price. This is due to greenfield developments offering greater economies of scale for land development and house construction and lower raw land prices.

Figure 12 compares the average sale price per sqm of new greenfield and infill dwellings in Hamilton City, based on properties built after 2020 and sold between May 2024 and May 2026.

The affordability difference varies by dwelling type. New stand alone dwellings in greenfield areas sold at approximately 83% of the equivalent infill price per sqm, while terrace dwellings sold at approximately 92% of the equivalent infill price per sqm. Sections also sold at approximately 81% of the equivalent infill land price per sqm. This indicates that, on average, greenfield housing is approximately 8% - 19% more affordable than infill housing on a per square metre basis.

This indicates that greenfield development continues to play an important role in providing relatively more affordable new housing options within Hamilton City. While greenfield housing is not the only solution to housing affordability, it provides an important source of large-scale supply and supports price competition within the wider residential market.

In addition, several studies confirm that greenfield housing can be produced at more affordable prices than infill housing. For example, a study completed by Urbis Ltd in 2011 found that greenfield housing was significantly less expensive than infill housing (32% cheaper in Brisbane, 10% cheaper in Adelaide, 5% cheaper in Sydney, 22% cheaper in Melbourne and 32% cheaper in Perth).

This demonstrates that the proposal can provide relatively affordable housing to the Hamilton market.

Figure 12:
Hamilton City Average Sale Price of New Build Properties between May 2024 - May 2026

Location Type	New Dwelling Sale Price/m²*			
	Stand Alone	Terrace	Apartment	Section
Greenfield	$5,380	$6,050	-	$1,350
Infill	$6,470	$6,610	$8,870	$1,670
Greenfield % Infill	**83%**	**92%**	**-**	**81%**

Source: Cotality, LINZ, UE

* Sale price per GFA for constructed dwellings, sale price per LA (Land Area) for sections.

6.1 Hamilton City Average House Price Growth 2005-2024

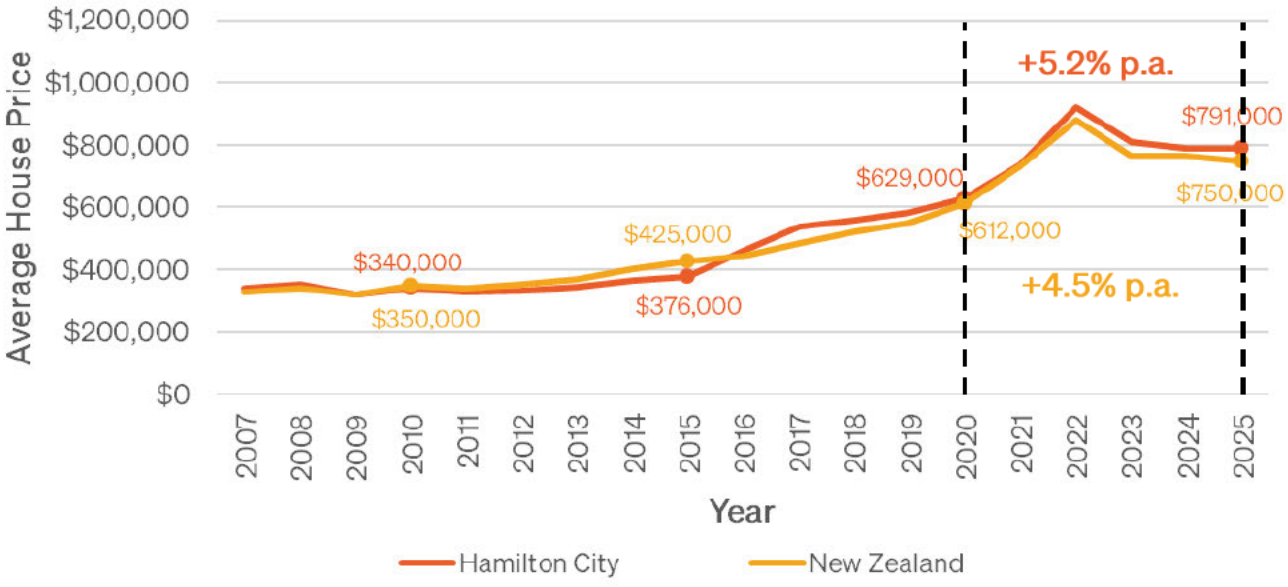
Figure 13 shows that average house prices in Hamilton City have increased steadily since 2007 and remain above the national average.

Since 2020, the average house price in Hamilton City has increased from approximately $629,000 to $791,000, equating to growth of approximately 5.2% per annum. Over the same period, the national average house price increased from approximately $612,000 to $750,000, or approximately 4.5% per annum.

This indicates that Hamilton has experienced slightly stronger house price growth than the national average over the recent period. This is consistent with a market where housing demand has remained strong relative to available supply, reinforcing the importance of additional residential capacity that can improve housing choice and market competition.

This further indicates that housing supply has not kept pace with demand, with sustained price growth reflecting persistent supply-side constraints. The proposal would therefore make a material contribution to increasing dwelling supply in the Hamilton market.

Figure 13:
Hamilton City Average House Price Growth 2007-2025



Source: REINZ, Cotality

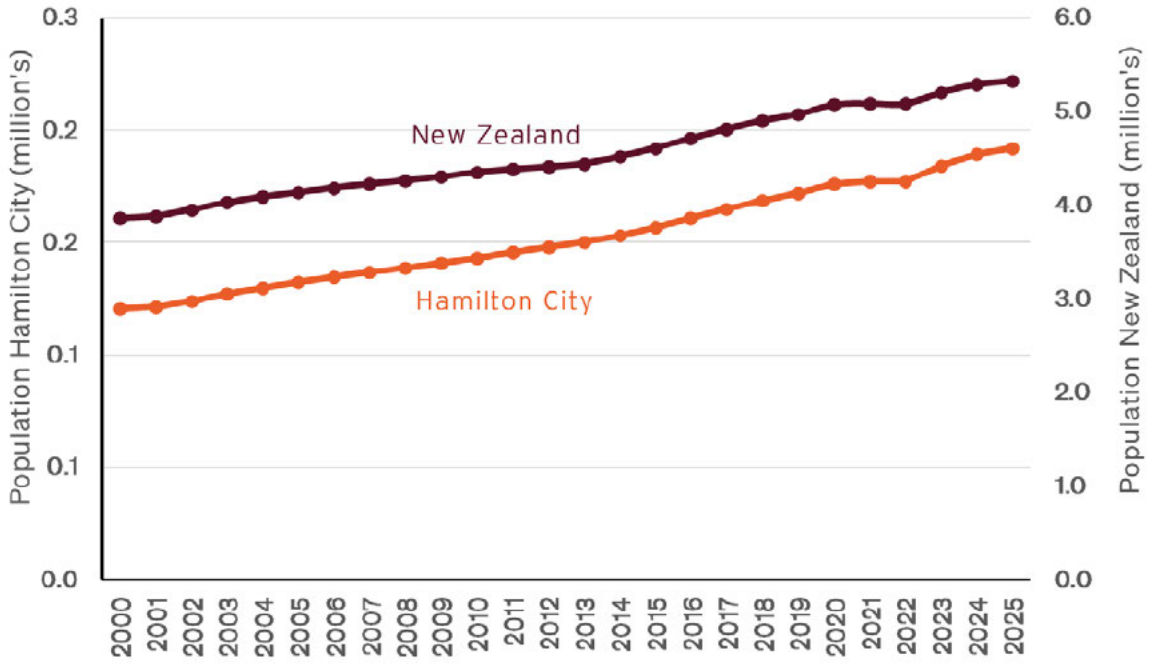
7. Hamilton City Population Growth

Figure 14 compares population growth in the study area with national population growth over the 2000-2025 period.

Hamilton City's population increased from approximately 120,500 in 2000 to 192,100 in 2025, representing growth of approximately 71,600 people, or 59%. Over the same period, New Zealand's population increased from approximately 3.8 million to 5.3 million, representing growth of approximately 38%.

This indicates that Hamilton City has grown at a faster rate than New Zealand overall, reflecting its role as one of the country's key high-growth urban centres. This strong population growth is a key driver of housing demand and reinforces the need for continued additions to residential supply within the study area.

Figure 14:
Study Area and National Population Growth 2000 - 2025



Source: Statistics NZ

8. Access to Employment Nodes & Services

This section assesses access to employment and services for future residents of the proposal.

The study area has experienced strong employment growth over the 2015-2025 period. As shown in Figure 15, employment increased from approximately 81,600 to 105,100 jobs, representing growth of approximately 23,500 jobs, or 29%. Over the same period, Hamilton City's population increased by approximately 35,300 people, or 23%.

This indicates that employment growth has exceeded population growth, supporting Hamilton's role as a high-performing urban economy. In 2025, the study area had approximately 0.55 jobs per resident, providing a relatively strong local employment base for future residents.

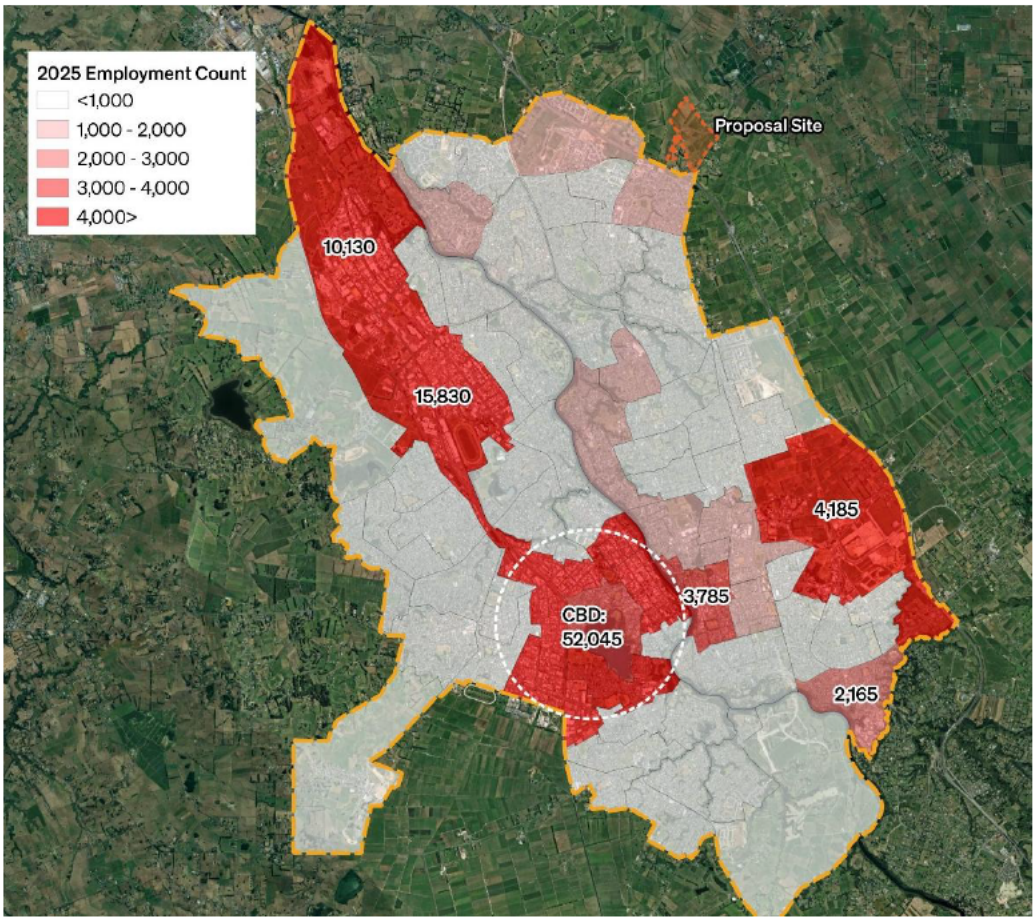
The proposal is located on the edge of Hamilton's urban area, with good access to the city's established employment nodes, services, and amenities. The site is located within approximately 15-20 minutes' drivetime of several major employment nodes within Hamilton, including the city centre, Te Rapa employment area, and Ruakura Superhub. This supports a well-functioning urban environment by enabling additional housing within reasonable travel times of Hamilton's main employment and service areas.

Figure 15:
Employment and Population Growth (2015-2025)

Study Area	2015	2025	Growth (2015-2025)	
			Nominal	%
Employment	81,600	105,100	23,500	29%
Population	156,800	192,100	35,300	23%

Source: Statistics NZ, UE

Figure 16:
Total Employment Counts within Hamilton City (2025)



Source: Statistics NZ

9. Hamilton City Infrastructure Provision

This section provides an overview of planned Council infrastructure investment in Waikato and Hamilton and outlines how the proposal will contribute toward the funding of growth-related infrastructure.

Over the next 10 years, Hamilton City Council has planned significant investment in wastewater infrastructure to support future growth. This includes a funded $1 billion investment in Hamilton's wastewater network, including a $500 million upgrade of the city's only wastewater treatment plant at Pukete, which provides city-wide wastewater treatment capacity and is intended to support more than 15 years of projected growth[4]. The broader wastewater investment programme also includes network upgrades targeted toward priority growth areas, including greenfield areas, the central city, and surrounding urban areas. Notwithstanding this, the project is not dependent on connecting to Hamilton City Council's water and wastewater networks and can be serviced independently through on-site infrastructure. If the project does connect to these networks, it would contribute towards the funding of planned infrastructure investment through relevant charges and/or contributions.

Although the site is located within the Waikato District, it would support Hamilton's urban housing market. To the extent that infrastructure is provided, funded, or administered through Waikato District Council, the proposal would also contribute to the funding of district infrastructure through applicable development contributions, financial contributions, connection charges, and/or other relevant charges. For example, funding the stormwater pump station and management systems. Once developed, the proposal would also increase the number of rateable units within the Waikato District, providing an ongoing rating base to assist with the funding of district-wide infrastructure and services.

Development contributions help recover the cost of growth-related infrastructure from development. Given the proposal would deliver a significant number of new dwellings over the medium term, it would support a more efficient cost recovery period through increased development contributions and rateable units, improving the financial efficiency of infrastructure delivery. In this context, the proposal would contribute to the funding base required to support Hamilton's continued growth.

10. Rural Economic Value of Development Site

The site is identified as suitable for dairy farming in Cotality's PropertyGuru, and this is adopted as the baseline economic use of the land.

To estimate the economic value of the site under dairying, an indicative farm revenue of $11,883 per hectare for the Waikato region has been applied, sourced from DairyNZ's Economic Tracker (2025). Across the total site area of approximately 54.0 hectares, this equates to gross farm revenue of approximately $640,000 per annum.

This level of output is estimated to generate approximately $240,000 in GDP annually, based on an agriculture sector value-added ratio of 37%, and to support around 2 full-time equivalent (FTE) jobs (refer Section 11). When projected over a 30-year period and discounted at 8%[5], this stream of

[4] https://hamilton.govt.nz/your-council/news/growing-hamilton/hamiltons-development-constraints-show-need-for-water-reform

[5] Reflecting Treasury guidance on discount rates.

economic benefits corresponds to a net present value (NPV) of approximately $2.9 million. This represents the present value of the future income-generating capacity of the site under dairying use.

Market-based evidence provides a complementary perspective. Dairy land in the Waikato region typically transacts at approximately $39,000 per hectare (Colliers, New Zealand Dairy Property Market Report, 2025), implying a total land value of around $2.1 million for the site. In comparison, the council rating database assesses the site at approximately $6.2 million, or $113,900 per hectare.

While these measures are derived using different approaches, they are underpinned by a common economic principle - the valuation of future benefits in present terms. The NPV provides an explicit, income-based estimate of value, while market transactions and rating valuations implicitly reflect the capitalisation of expected future returns into current land prices.

Taken together, these three indicators - the modelled NPV, observed market evidence, and rating valuation, provide a consistent range of values. The NPV estimate of approximately $2.9 million sits between the lower bound indicated by market transactions and the upper bound reflected in rating valuations and is therefore considered a reasonable central estimate of the site's economic value under its current dairying use[6].

Figure 17:
Rural Economic Value of the Site

Valuation Source	Site Land Area (Ha)	Land Value / Ha	Land Value
Market Sales (Colliers)	54.0	$39,000	$2,110,000
Council Valuation (Waikato District Council)	54.0	$113,900	$6,150,000
NPV of Economic Value	54.0	$54,100	$2,920,000

Source: Colliers NZ, Waikato District Council, DairyNZ, Statistics NZ, UE

11. Economic Contribution to GDP & Employment

This section assesses the impact of the proposal on employment and GDP, based on an adopted mid-point yield of 900 dwellings. This assessment addresses whether the proposal will "deliver significant economic benefits" for Hamilton City or the Waikato Region, as required by Section 22(2)(a)(iv) of the Fast-track Approvals Act, with respect to the purpose of the Act outlined in Section 3. While GDP and FTE employment are key indicators of economic contribution, they form only part of the broader assessment of economic benefits, which also includes the proposal's contribution to housing supply, market responsiveness, infrastructure funding, and a well-functioning urban environment.

As outlined in Section 10, the adopted base case use of the site is dairy farming. This provides the counterfactual against which the economic contribution of the proposal is assessed.

[6] The estimated rural productive value is materially below the current Council valuation of $6.15 million, equivalent to approximately $113,900 per hectare. The Council valuation is considered to reflect a broader residential/amenity value, given the site's proximity to the Hamilton Urban Area, whereas the Rural Base Case estimate reflects the site's fundamental rural productive value under a dairying use.

11.1 Construction GDP & Employment Contribution

The economic contribution of the proposal has been assessed using a value-added approach[7]. This estimates the contribution to GDP and full-time equivalent (FTE) employment generated through construction.

The assessment includes direct and indirect economic effects. Direct effects relate to the construction activity generated by the proposal itself, while indirect effects relate to the wider supply chain activity generated across other sectors of the economy.

The national value-added per employee has been applied to estimate FTE employment for the direct construction activity and the rural productive Base Case. Economic multipliers have also been applied to estimate the wider indirect flow-on effects generated by construction activity.

Figure 18 outlines the national value-added per employee used to estimate FTE employment for the direct construction activity and the rural productive Base Case. These ratios provide the basis for converting the relevant GDP impacts into estimated employment effects.

Figure 18:
Construction and Agriculture Sector Value-Added per Employee

Sector	Value Added GDP ($M)	FTE Employees	Value Added GDP Per Employee
Construction	$32,410	204,200	$159,000
Agriculture	$12,206	79,500	$154,000

Source: Statistics NZ

Figure 19 applies these assumptions to the proposal and outlines the estimated **direct** GDP contribution and employment generated by each development component. The main points to note are:

- The residential development component of the proposal is estimated to generate approximately $586.8 million in construction value, $178.2 million in value-added contribution to Construction Sector GDP and support approximately 1,125 FTE jobs.
- The Neighbourhood Centre development component of the proposal is estimated to generate approximately $12.0 million in construction value, $3.6 million in value-added contribution to Construction Sector GDP and support approximately 23 FTE jobs.

In total, the proposal is estimated to directly generate approximately $598.8 million in construction value, $181.9 million in value-added contribution to Construction Sector GDP and support approximately 1,148 FTE jobs.

[7]The value-added of an industry, also referred to as gross domestic product (GDP)-by-industry, is the contribution of a private industry or government sector to overall GDP. The components of value-added consist of compensation of employees, taxes on production and imports less subsidies, and gross operating surplus. Value-added equals the difference between an industry's gross output (consisting of sales or receipts and other operating income, commodity taxes, and inventory change) and the cost of its intermediate inputs (including energy, raw materials, semi-finished goods, and services that are purchased from all sources).

Figure 19:
Direct Construction Value, GDP and Employment by Development Component

Development Component	Dwelling Count	Project Value ($M)	Value Added GDP ($M)	FTE Employees
Residential	900	$586.8	$178.2	1,125
Neighbourhood Centre	-	$12.0	$3.6	23
Project Total	**900**	**$598.8**	**$181.9**	**1,148**

Source: UE, Statistics NZ, Earl Design

Figure 20 provides the total estimated **indirect** GDP contribution and employment generated, including the impact on the primary sector (as required under Section 22(2)(v) of the FTAA). The indirect effects have been estimated using economic multipliers that reflect the interrelationship between different sectors of the economy, based on Statistics NZ input-output tables. This approach captures the flow-on activity generated through supply chain linkages, including increased demand for goods and services from manufacturing, transport, wholesale trade, professional services, primary industries and other supporting sectors.

The main points to note are:

- The indirect effects across all other sectors are estimated to generate a further $173.7 million in GDP and support approximately 866 FTE jobs.
- Within this indirect total, approximately $10.2 million in GDP is estimated to be generated within primary sectors, supporting approximately 6 FTE jobs. This reflects supply chain activity in agriculture, forestry, fishing and mining industries, including raw materials used in construction such as timber and aggregates.
- In total, the construction of the proposal is estimated to generate approximately $355.6 million in GDP and support approximately 2,014 FTE jobs, including both direct and indirect impacts.

While this analysis focuses on direct and indirect effects, additional induced effects are also likely to occur. These arise as workers employed directly and indirectly spend their incomes within the wider economy, generating further activity in sectors such as retail, food services, housing and local services. These induced effects have not been quantified, and as such the results presented in Figure 20 are considered conservative.

Figure 20:
Total Construction GDP and Employment Impact, Including Primary Sector Contribution

Impact	Sector	Output Multiplier	Value/ Output ($M)	Value Added Multiplier **	Value Added to GDP ($M)	FTE Employee Estimate
Direct	**Construction**	**1.00**	**$598.8**	**0.30**	**$181.9**	**1,148**
Indirect	Primary*	-	-	0.02	$10.2	6
	Other	-	-	0.27	$163.6	860
	Sub-total	**0.71**	**$425.2**	**0.29**	**$173.7**	**866**
Total Impact	**-**	**1.71**	**$1,024.0**	**0.59**	**$355.6**	**2,014**

Source: Statistics NZ, UE

*Comprising sectors related to Agriculture, Forestry, Fishing and Mining.

**Value added multipliers are expressed per dollar of direct construction output. Indirect output is shown at sub-total level only, as the sector breakdown focuses on the contribution to GDP and employment.

Figure 21 compares the total construction-related economic impact of the proposal, including both direct and indirect effects, against the existing rural use of the site, referred to as the Base Case.

As outlined in Section 10, the adopted base case use of the site is dairy farming. This is estimated to contribute approximately $0.2 million to GDP and support approximately 2 FTE jobs. This is based on indicative farm revenue of approximately $11,883 per hectare for the Waikato region, sourced from DairyNZ's Economic Tracker[8], applied across the 54.0 hectare site area.

In contrast, the proposal would contribute an estimated $355.6 million to GDP and support approximately 2,014 FTE jobs, once direct and indirect effects are included.

Overall, the proposal would result in a net additional contribution of approximately $355.4 million to GDP and support approximately 2,012 additional FTE jobs when compared with the Base Case.

Figure 21:
Total Construction GDP and Employment Impact Compared with Rural Productive Base Case

Scenario	Project Value ($M)	Value Added GDP ($M)	FTE Employees
Rural Base Case*	$2.9*	$0.2*	2**
The Development	$1,024.0	$355.6	2,014
Net Difference	**$1,021.1**	**$355.4**	**2,012**

Source: UE

*Present value of the future income-generating capacity of the site under dairying use over 30 years.

**Annual GDP/FTE generated/supported from dairying operation

Overall, this demonstrates that the proposal would generate a significant short-to-medium term economic contribution through construction activity. These benefits would extend beyond the direct construction sector into the wider economy, including notable flow-on contributions to primary industries.

11.2 Employment & GDP Generation from Ongoing Expenditure

Figure 22 shows the estimated national value-added per FTE employee for sectors likely to benefit from ongoing household expenditure. These sectors include Retail Trade, and Accommodation and Food Services. Together, these sectors contribute approximately $27.1 billion to national GDP and employ approximately 269,400 FTEs, equating to value-added GDP of approximately $100,000 per employee.

[8] https://www.dairynz.co.nz/resources/tools/dairynz-econ-tracker-tool/

Figure 22:
Ongoing Household Expenditure GDP and Value-added per Employee Sectors

Sector	Value Added GDP ($M)	FTE Employees	Value Added GDP Per Employee
Retail Trade	$17,870	165,800	$108,000
Accommodation and Food Services	$9,180	103,600	$89,000
Total	**27,050**	**269,400**	**$100,000**

Source: Statistics NZ

Figure 23 provides an estimate of the ongoing household expenditure expected upon completion of the proposal (i.e. 2035) and achieved incrementally over the 2026-2035 period[9]. The main points to note are:

- The average household expenditure is estimated at approximately $50,400 per annum[10]. This generates an estimated value-added GDP contribution of approximately $28,000 per household per annum.
- At 900 dwellings, total ongoing household expenditure resulting from residents of the proposal is estimated at approximately $45.2 million per annum. This is estimated to generate approximately $25.1 million in value-added GDP per annum and support approximately 250 FTE jobs.

This represents an ongoing annual economic contribution to the Hamilton and wider Waikato regional economy, in addition to the one-off construction-related impacts outlined in Section 11.1.

Figure 23:
Employment & GDP Generation from Ongoing Household Expenditure

Ongoing Household Expenditure	Number of Households	Average HH Spend ($p.a.)*	Value Added GDP (p.a.)	HH Expenditure Per Annum ($M)	Value Added GDP Per Annum ($M)	FTE Employees (p.a.)
Proposal	900	$50,400	$28,000	$45.2	$25.1	250

Source: UE, Statistics NZ

*Upon completion of proposed development (approximately 2035).

12. Greenfield Development Sale Rate Analysis

This section provides an assessment of sale rates achieved by a sample of greenfield developments in Hamilton City.

Figure 24 outlines recent sale rates achieved by current greenfield developments within the study area that have achieved at least 50 dwelling/lot sales, in order to focus on developments with an

[9] This includes economic benefits associated with the ongoing operation of the proposed neighbourhood centre.
[10] Informed by Statistics NZ Average weekly household expenditure on typical weekly expenditure categories (e.g. food/groceries, transport, recreation and culture, insurance etc.).

established sales history. The developments assessed range in scale from approximately 84 to 1,800 dwellings/lots.

Across the developments assessed, annual sale rates vary materially, from an average of approximately 10 dwellings/lots per annum at Kauri Point to approximately 75 dwellings/lots per annum at Greenhill Park.

Based on the sale rates observed across these developments, an average sale rate of approximately 70 dwellings per annum is considered achievable for the proposal. This would equate to 10% of annual greenfield demand, and 5% of annual total housing demand.

Figure 24:
Current Greenfield Development Sale Rate Summary

Development	Development Size (Dwellings/Lots)	Annual Dwelling Sales		
		Min	Avg	Max
Greenhill Park	1,800	30	75	130
Rotokauri Rise*	900	-	65	-
Aurora	450	10	25	50
Hapori Park	280	8	12	15
Kinfields (Bourn Brook & Bourn Heath)	151	4	12	20
Kauri Point	84	4	10	16

Source: Cotality, Developer Websites

*Based on first release (131 lots) being fully sold in approximately 2-years (2018-2019).

13. Fast-track Approvals Act Economic Considerations

This section assesses the proposal against the relevant economic matters related to regional or national significance in the Fast-track Approvals Act.

The relevant section for an economic analysis is outlined as follows.

Section 3: *"The purpose of this Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits."*

The following sections may provide some guidance on how to determine significant regional or national economic benefits.

Section 22(1): *"The criteria for accepting a referral application are that-*

(a) the project is an infrastructure or development project that would have significant regional or national benefits…"

Section 22(2): *"For the purposed of subsection (1)(a), the minister may consider-*

(a) whether the project-

…

(iii) will 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)

(iv) will deliver significant economic benefits

(v) will support primary industries, including aquaculture:

Each of the subsections outlined above are addressed below.

Section 22(2)(a)(iii): Housing Supply and Contribution towards Well-Functioning Urban Environment

The proposal would make a significant contribution to the supply of housing in the Waikato Region and contribute towards a well-functioning urban environment.

Policy 1 of the National Policy Statement on Urban Development (NPS-UD) reads as follows:

> ***Policy 1:*** *"Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*
>
> *(a) have or enable a variety of homes that:*
>
> *(i) meet the needs, in terms of type, price, and location, of different households…*
>
> *(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
>
> *(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; …."*

The proposal would make a substantial contribution to the operation of the greenfield residential land and development market, and overall urban housing market, within the Waikato Region, which is currently constrained relative to future demand. As outlined in Section 5.4, current and known pipeline greenfield developments are estimated to provide approximately 8.8 years of greenfield demand in the study area. This indicates that the Hamilton 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.

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 material contribution toward a more efficient and competitive residential land and development market. At this scale, it would supply an estimated 70 dwellings per annum, equivalent to approximately 10% of total annual greenfield housing demand.

The proposal would help address the residential capacity shortfall identified in the 2023 HBA. 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).

In this context, the proposal would increase housing supply in a high-growth urban market, provide a broad mix of housing types and price points, and support the competitive operation of the greenfield residential land market. The proposal is therefore considered to meet Section 22(2)(a)(iii) of the Fast-track Approvals Act.

Section 22(2)(a)(iv): Significant Economic Benefits

The proposal is estimated to deliver significant economic benefits through construction activity and ongoing household expenditure.

As outlined in Section 11.1, the proposal is estimated to generate approximately $598.8 million in project value, directly contributing approximately $181.9 million to GDP and supporting approximately 1,148 FTE jobs during construction. When indirect effects are included, the total construction impact is estimated at approximately $355.6 million in GDP and 2,014 FTE jobs.

The proposal would also generate ongoing economic benefits once complete. As outlined in Section 11.2, future household expenditure associated with the proposal is estimated to generate approximately $45.2 million in expenditure per annum, contributing approximately $25.1 million to GDP per annum and supporting approximately 250 FTE jobs.

In addition to these quantified benefits, the proposal would deliver 850 to 950 dwellings to the Hamilton housing market, increasing greenfield housing supply in a market facing identified capacity and competition constraints. This would support housing choice, market efficiency, and affordability outcomes over time.

The proposal is therefore considered to deliver significant economic benefits and meet Section 22(2)(a)(iv) of the Fast-track Approvals Act.

Section 22(2)(a)(v): Contribution towards Supporting Primary Industries

The proposal would support primary industries through construction-related supply chain activity.

As outlined in Section 11.1, the indirect impact of the construction of the proposal on primary sector industries is estimated to be approximately $10.2 million in GDP, supporting approximately 6 FTE jobs. This includes activity in primary sectors such as agriculture, forestry, fishing, and mining, arising from the supply of raw materials used in construction, including timber and aggregates.

It is also noted that the proposal would result in the loss of the existing rural use of the site. As outlined in Section 10, the adopted base case use of the site is dairy farming, which is estimated to contribute approximately $0.2 million to GDP and support approximately 2 FTE jobs per annum. This loss is small relative to the economic benefits generated by the proposal through construction activity and ongoing household expenditure. It is therefore not considered to be out of proportion with the proposal's regional benefits.

The proposal is therefore considered to support primary industries and meet Section 22(2)(a)(v) of the Fast-track Approvals Act.

In conclusion, the proposal is considered to meet Section 3 of the Fast-track Approvals Act, as it would deliver significant regional benefits, with only minor costs. These include a significant contribution to GDP and employment, support for primary industries through construction-related supply chain activity, and a material contribution to housing supply in a constrained greenfield market including by supplementing existing competition in the market. The proposal would also support a well-functioning urban environment by providing a broad mix of housing types and price points in the Hamilton housing market.

14. Economic Costs and Benefits Summary

The economic benefits of the proposal are summarised as follows:

- The proposal would deliver approximately 850 to 950 new dwellings to the Hamilton housing market, comprising a mix of stand alone and terrace/duplex dwellings.
- The proposal would contribute to a constrained greenfield housing market, increasing identified greenfield capacity from approximately 8.8 years to 10.0-10.2 years of greenfield demand.
- The proposal would provide a substantial supply of new housing at relatively affordable average price points, with an estimated average sale price of approximately $820,000.
- The proposal would deliver an estimated 70 dwellings per annum, equivalent to approximately 10% of estimated annual greenfield dwelling demand and would represent the fourth largest identified current or pipeline greenfield development in the Hamilton market.
- The proposal would assist in addressing the medium-term housing capacity shortfall identified in the HBA, including the projected shortfall of approximately 2,800 dwellings within the Hamilton main urban centre.
- The proposal is well located within the Hamilton housing market, on the north-eastern boundary of the city, where recent sales evidence indicates strong demand for housing.
- The proposal has good access to Hamilton's established employment base, including the city centre, Te Rapa employment area, and Ruakura Superhub, which are located within approximately 15–20 minutes' drivetime of the site.
- The proposal would contribute towards a well-functioning urban environment by increasing housing choice in terms of type, price, and location, and by supporting the competitive operation of the greenfield land and development market.
- The proposal would deliver a neighbourhood centre comprising approximately 1,500m² of convenience floorspace, providing everyday retail, food and beverage, commercial, community, and complementary services within the development. This would improve local access to goods and services, reduce the need for residents to travel outside the neighbourhood for day-to-day needs, support local employment opportunities, and contribute to a more self-sufficient and well-functioning urban environment.
- The construction of the proposal would enable a $598.8 million development, directly 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 2,014 FTE jobs.
- The proposal would result in flow-on economic benefits to primary industries, including approximately $10.2 million in GDP and 6 FTE jobs.
- Once complete, ongoing household expenditure associated with the proposal is estimated to generate approximately $45.2 million in expenditure per annum, contributing approximately $25.1 million to GDP per annum and supporting approximately 250 FTE jobs.
- The proposal would help fund growth-related infrastructure upgrades required to support Hamilton's continued urban growth, through increased development contributions and additional rateable units.

The economic costs resulting from the proposal are:

- The proposal would result in the loss of the existing rural use of the site. This use is estimated to contribute approximately $0.2 million to GDP per annum and support approximately 2 FTE jobs. This loss is not considered to be sufficiently significant to be out of proportion to the proposal's regional benefits.
- Short-term construction impacts, including noise and traffic disruption effects. These are temporary in nature and would be managed through the construction phase.

15. Conclusion

Based on the economic costs and benefits outlined in this assessment, the proposal is considered to deliver significant regional economic and urban development benefits. In particular, the proposal would make a material contribution to housing supply in a constrained greenfield market, improve housing choice across dwelling types and price points, support the competitive operation of the residential land and development market, and assist in addressing identified housing capacity constraints within the Hamilton urban housing market.

The proposal would also support a well-functioning urban environment by locating additional housing close to Hamilton's established employment base, delivering a neighbourhood centre that provides day-to-day services and local employment opportunities, generating substantial construction and ongoing economic activity, and contributing to the funding of growth-related infrastructure. The economic costs of the proposal are limited, principally comprising the loss of the existing rural use of the site and temporary construction-related effects. These costs are not considered to be material or sufficient to outweigh the significant regional economic and urban development benefits of the proposal.

Therefore, the proposal is considered to meet the relevant economic requirements of the Fast-track Approvals Act 2024.