HORSHAM DOWNS ESTATE– CONSULTATION RECORD

Table 1: Consultation with Local Authorities

Consultation Party	Consultation date and detail	Response Summary	Referral Response to matters raised
Waikato Regional Council	**12 May 2026** Email sent with letter outlining the Horsham Downs Estate Project. **Email stated:** *"Good Afternoon,* *Please find attached the proposal summary for a Fast Track referral for the Horsham Downs Estate Project.* *The attached documents include:* • *Outline of the Project* • *Concept Plan for the Project* *We would be grateful if a response could be provided within 20 working days,* ***by COB on Wednesday 10 June 2026****."* [note documents provided as **Attachment A**]	Various emails were sent and received: • Jane Macartney (planner at Tollemache Consultants) and Miffy Foley (WRC) (on 13th May 2026) outlining coordination of a meeting with the applicant, council staff and provision for initial feedback. • Jane Macartney and Mark Tollemache (planners at Tollemache Consultants), Miffy Foley and Katrina Andrews (WRC staff) (between 13 May 2026- 28 May 2026) to organise a meeting time and date as well as agreement for meeting to be joint with HCC and WDC, set up charge forms and codes for the meeting. On 22 May 2026 some communication emails expanded to include staff at HCC and WDC.	NA
	3 June 2026 **On-line meeting with WRC/WDC/HCC representatives**	Meeting outlined proposal memo and identified process for next steps for the Regulatory Authorities to provide responses.	NA
	Email received 19 June 2026 from WRC (Katrina Andrews)	Email confirming WRC's endorsement of the statement of facts received from WDC, and noting the site is within the Waikato central Land Drainage Scheme; and stating that:	The Stormwater Memorandum (Attachment 7 to the referral application) addresses the land drainage network, including management of runoff from urban development to ensure that the required volume retention can be provided for the post development flows.

Consultation Party	Consultation date and detail	Response Summary	Referral Response to matters raised
		The level of service for open drains and culverts of this scheme is generally to drain water from a 10% AEP rainfall event within three days; the drainage scheme is not designed to accommodate urban runoff. Therefore, any proposed development in this area will need to ensure there is no impact on WRC's land drainage network. Proposed stormwater management will need to ensure that the required volume retention can be provided for the post development flows.	The concept plan (Attachment 2 to the referral application) indicates a large stormwater device which has been preliminary sized (as per the requirements in the Stormwater Memorandum (Attachment 7) to the referral application. Thus, provision of devices to manage stormwater have been addressed in the proposal. A detailed Stormwater Management Plan will be provided as part of a substantive application. No further response or update to the Referral is required to address these matters.
Waikato District Council	**12 May 2026** Email sent with letter outlining the Horsham Downs Estate Project *Email was as described above.*	No direct comms from WDC received. However, email communications from both WRC and HCC (outlined above and below) included WDC staff.	NA
	3 June 2026 On-line meeting with WRC/WDC/HCC representatives	Meeting outlined proposal memo and identified process for next steps for the Regulatory Authorities to provide responses.	NA
	Email received 19 June 2026 from WDC (Donna Tracey)	Email contained letter issued as a "Statement of Facts" which was the agreed outcome of the meeting. A copy of this letter has been provided as (Attachment B). A summary is provided below:	
		Land Use considerations: • Referral to outline how the proposal will increase housing supply, address housing need, and deliver significant regional housing and economic benefits. • Substantive application will need to clearly address the implications of urban development in this location.	The referral addresses in detail (with supporting technical reports, eg. Economics) how the Project will deliver significant regional benefits including housing apply and economic benefits. These are specifically addressed in Section 5 of Attachment 1 to the referral application. The Planning Memorandum (refer to Attachment 5 to the referral application) addresses the National Policy Statement for Highly Productive Land.

Consultation Party	Consultation date and detail	Response Summary	Referral Response to matters raised
		• Relevant processes and assessments required under the National Policy Statement for Highly Productive Land will need to be incorporated into the application.	No further response or update to the Referral is required to address these matters.
		Transport considerations: • Need to address traffic effects • Infrastructure to be vested should align with the RITS • Further consideration of public transport and walking/cycling connectivity	The Transport Assessment (Attachment 10 to the referral application) addresses transportation effects (including mitigation of effects), connectivity for walking cycling and public transport. A detailed Integrated Transport Assessment will be provided as part of a substantive application as well as any detail to confirm that assets to vest will either meet RITS or appropriate departures may be obtained (noting that this level of detail is a matter for engineering plan approval, which is not an approval under the RMA and is typically conditioned). No further response or update to the Referral is required to address these matters.
		Water, Wastewater and Stormwater considerations: • Further consultation with IAWAI for public servicing (existing network may not have capacity) • The substantive application to clearly demonstrate the feasibility, funding, ownership, operation, maintenance, and long-term management of all three waters infrastructure • Discuss surface water or groundwater needs with WRC early • Stormwater management to be addressed in accordance with current best practice • Wastewater discharge proposals, including any private wastewater treatment plant and discharge to land or water, will require detailed technical, ecological, cultural, and regulatory assessment	These matters have been largely addressed in the Infrastructure Report and Stormwater Memorandum (Attachments 6 and 7 to the referral application). Further consultation with IAWAI on capacity and WRC for groundwater will be undertaken as part of the substantive application. Detailed technical assessments to support all three waters aspects (including water takes and discharges) will be undertaken as part of the substantive application. No further response or update to the Referral is required to address these matters.

Consultation Party	Consultation date and detail	Response Summary	Referral Response to matters raised
		Parks, Open Space and Ecology considerations: • Further discussion with WDC on ownership • Ecological values, watercourse works, wetland impacts, and any required offsetting or enhancement measures will need to be assessed and addressed through the substantive application	An Ecology Assessment (Attachment 13 to the referral application) has a been provided which addresses these matters at a high level. This assessment acknowledges that a detailed assessment will be provided as part of the substantive application. Further discussions on ownership will be undertaken as part of the substantive application. No further response or update to the Referral is required to address these matters.
		Affected Neighbouring Landowners / Reverse Sensitivity: • Potential reverse sensitivity effects • Substantive application to detail how interfaces will be treated to manage effects	The Planning Memorandum (Attachment 5 to the referral application) has addressed potential reverse sensitivity effects. No further response or update to the Referral is required to address these matters.
Hamilton City Council	**12 May 2026** Email sent with letter outlining the Horsham Downs Estate Project. *Email was as described above.*	Various emails were sent and received: • Jane Macartney (planner at Tollemache Consultants) and Juliana Reu Junqueira (WRC) (on 13th May 2026) outlining coordination of a meeting with the applicant, council staff and provision for initial feedback. • Jane Macartney and Mark Tollemache (planners at Tollemache Consultants), and Chris Dillon (between 15 May 2026- 27 May 2026) to organise a meeting time and date as well as agreement for meeting to be joint with WRC and WDC. Some communication emails expanded to include staff at HCC and WDC. Discussions on process were also undertaken between15 May and 28 May between HCC staff and planners at Tollemache Consultants.	

Consultation Party	Consultation date and detail	Response Summary	Referral Response to matters raised
	3 June 2026 On-line meeting with WRC/WDC/HCC representatives	Meeting outlined proposal memo and identified process for next steps for the Regulatory Authorities to provide responses.	NA
	Email received 19 June 2026 from HCC (Arthur Hung)	Email contained letter issued as a "Statement of Facts" which was the agreed outcome of the meeting. A copy of this letter has been provided as Attachment C. A summary is provided below:	
		Section 22 Analysis – delivery of significant regional benefits. • HCC considers that the potential Hamilton pipeline should be taken into account and that the pipeline is substantial. • Concerns of landbanking. • HCC consider a Schedule 1 process may be more appropriate given the pressure of a FTAA process where applications cannot be paused.	The referral addresses in detail (with supporting technical reports, eg. Economics how the Project will deliver significant regional benefits including housing apply and economic benefits. These are specifically addressed in Section 5 of Attachment 1 to the referral application. The Planning Memorandum (Attachment 5 to the referral application) also assesses the proposal against the NPS-UD, which amongst other things requires particular regard to any contribution made to provide or realise development capacity. Concerns for landbanking are unfounded as all resource consents have a lapse date if they are not given effect to.
		Project Boundary	The Application has clearly defined its Project sites as per Section 2 of the of Attachment 1 to the referral application.
		Highly Productive Land • Relevant processes and assessments required under the National Policy Statement for Highly Productive Land will need to be incorporated into the application	The Planning Memorandum (Attachment 5 to the referral application) addresses the National Policy Statement for Highly Productive Land.
		Reverse Sensitivity:	The Planning Memorandum (Attachment 5 to the referral application) has addressed potential reverse sensitivity

Consultation Party	Consultation date and detail	Response Summary	Referral Response to matters raised
		• Potential reverse sensitivity effects on rural land • Noise from the State Highway	effects. It also notes that the Waikato District Plan already has a planning mechanism to manage effects from state highway noise. The Project Area falls outside the mapped WDC overlay for state highway noise. No further response or update to the Referral is required to address these matters.
		Transport and Three Waters [note these are the same as the concerns raised by WDC above)	Refer to the response above for WDC.
IAWAI	**14 May 2026** Email sent with letter outlining the Horsham Downs Estate Project. *Email was as described above.*	No direct response received. However, comms with HCC/WDC identified that they speak for IAWAI.	

Table 2: Consultation with Other Authorities and Administrative Agencies

Consultation Party	Consultation date and detail	Summary of response	Referral Response to matters raised
Ministry for the Environment	**12 May 2026** Email sent with letter outlining the Horsham Downs Estate Project. **Email stated:** *"Good Afternoon,* *Please find attached the proposal summary for a Fast Track referral for the Horsham Downs Estate Project.* *The attached documents include:* • *Outline of the Project* • *Concept Plan for the Project* *We would be grateful if a response could be provided within 20 working days,* ***by COB on Wednesday 10 June 2026****."* [note documents provided as **Attachment A**]	**Email response on 13.5.26:** Confirmed receipt of 12.5.26 email and advised that their team would get back to the applicant as soon as they can. **Email response on 15.5.26:** Advice that MfE is no longer a relevant administering agency for the RMA as the section 11 requirement for pre-lodgement consultation has been removed as a result of the December 2025 amendment to the FTAA.	NA
Department of Conservation	**12 May 2026 - Email** *Email was as described above.*	**Email response on 13.5.26 from DoC** (Grace Masterton) confirming receipt and requesting further information and a pre-lodgement form. **Email sent on 15.5.26 to DoC** providing their completed pre-application form and customer information form, Records of Title and easement document.	
		Email received from DoC 18.5.26 (Shawn Gardner – Consultant Planner) advising that summary is being prepared so that their internal project team can provide high-level guidance on the Project. Requested any draft ecological.	

Consultation Party	Consultation date and detail	Summary of response	Referral Response to matters raised
		Email to DoC sent 22.5.26 (Shawn Gardner) – provided draft ecology report prepared by Ecological Solutions.	
		Email received from DoC 8.6.25 (Shawn Gardner) In summary, DoC advises: • Copper skinks are likely to be present, long-tailed bats may be present, and wetland birds may intermittently inhabit areas around the drains within the Project Area. • Adverse effects on conservation values must be appropriately managed (particularly for species that are Threatened or At-Risk, and where adverse effects may be cumulative). • There are records of At-Risk species nearby (longfin eel and common smelt). Initial information provided appears to indicate that wetlands and waterways may be impacted. • Complex Freshwater Fisheries Activity Approvals may be required. • Proposals for in-stream structures need to consider NZ Fish Passage Guidelines/Earth Sciences NZ/NIWA. • The applicant should reach out directly to the relevant Māori groups as required by s11(b)(ii) of the FTAA. • The identification of Treaty settlement obligations with respect to the Project Area will form part of the s18 report prepared by the Ministry for the Environment. • The management of any indigenous species and habitats (including birds, bats, lizards and fish) will need to be addressed in the substantive application. Works in streams and wetlands will need to ensure there is no net loss in extent and values.	An Ecology Assessment (Attachment 13 to the referral application) has a been provided which addresses these matters at a high level. This assessment acknowledges that a detailed assessment will be provided as part of the substantive application. A Complex Freshwater Fisheries Activity Approvals is not anticipated, however should one be required it will be obtained separately. No further response or update to the Referral is required to address these matters.

Consultation Party	Consultation date and detail	Summary of response	Referral Response to matters raised
		• The AEE, supporting ecological reports and draft conditions should be provided to DoC prior to submission of the substantive application. • The application is not inconsistent with the following statutory planning documents – Conservation General Policy 2005, Waikato Conservation Management Strategy 2014, Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 and Ngati Tuwharetoa, Raukawa, and Te Arawa River Iwi Waikato River Act 2010. • A drainage plan is requested before lodgement of any substantive application to demonstrate that Lake Tunawhakaheke will not receive urban runoff during high groundwater periods or treated wastewater.	
Heritage New Zealand Pouhere Taonga	**12 May 2026 Email** *Email was as described above.*	**Email received 10.6.26** Advised that review of CFG Heritage assessment would occur to confirm whether an accidental discovery protocol or an authority is more appropriate for the Project. Advised that the existing villa needs to be assessed to determine its likely date of construction. If pre-1900, then earthworks in close proximity or its demolition would require an archaeological authority.	The Archaeological Assessment (Attachment 14 to the referral application) has a been provided which addresses these matters. The referral application includes the relevant approvals to be sought under the RMA, Heritage New Zealand Pouhere Taonga Act. No further response or update to the Referral is required to address these matters.

Table 3: Consultation with Mana Whenua

Consultation Party	Consultation date and detail	Summary of response
Te Whakakitenga o Waikato	**12 May 2026 - Email stated:** *Kia ora,* *Please find **attached** the proposal summary for a Fast Track referral for the Horsham Downs Estate Project.* *The **attached** documents include:* • *Outline of the Project* • *Concept Plan for the Project* 1. *If your relevant iwi authority or relevant Treaty settlement entity intends to provide feedback or CIA, please advise of your availability for booking a Site visit.* 2. *Alternatively, if your relevant iwi authority or relevant Treaty settlement entity does not intend to provide feedback or a CIA, please advise whether you:* *(a) Would like to defer your interest to another iwi authority or relevant Treaty settlement entity; or* *(b) Have identified the project to be outside your relevant area of interest.* *We will forward the Waikato-Tainui consultation form shortly.* *We would be grateful if a response could be provided within 20 working days, by **COB on Wednesday 10 June 2026.*** *We are grateful to you for your time in reading these documents and would be happy to provide any further information or clarification needed.*	No response was received. The date for lodgement of the referral application exceeds the 20 working days required by Section 11(1A) the FTAA.

	Nga mihi, *Jane* [note documents provided as **Attachment A**]	
	Email 14 May 2026 provided the completed Waikato-Tainui consultation form.	
Ngati Haua Iwi Trust	**12 May 2026 Email** *Email was as described above.*	No response was received. The date for lodgement of the referral application exceeds the 20 working days required by Section 11(1A) the FTAA.
Te Haa o te Whenua o Kirikiriroa (THaWK)	**12 May 2026 Email** *Email was as described above.*	No response was received. The date for lodgement of the referral application exceeds the 20 working days required by Section 11(1A) the FTAA.
Ngati Wairere	**12 May 2026 Email** *Email was as described above.*	No response was received. The date for lodgement of the referral application exceeds the 20 working days required by Section 11(1A) the FTAA.
Waikato Raupatu River Trust	**12 May 2026 Email** *Email was as described above.*	No response was received. The date for lodgement of the referral application exceeds the 20 working days required by Section 11(1A) the FTAA.
Waikato River Authority	**12 May 2026 Email** *Email was as described above.*	No response was received. The date for lodgement of the referral application exceeds the 20 working days required by Section 11(1A) the FTAA.

Attachment A:

TOLLEMACHE CONSULTANTS LTD.

From: Tollemache Consultants Limited

Date: May 2026

Subject: Horsham Downs Estate (319 Gordonton Road, Rototuna)

Overview of the Proposal for Referral Application for consultation with Regulatory Authorities / stakeholders

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1.0 INTRODUCTION

1.1 This memorandum provides a high-level outline of the proposal sought in respect of the Horsham Downs Estate Project which is intended to be lodged as a Referral Application under the Fast Track Approvals Act 2024 ("FTAA"), by Horsham Downs Estate Limited ("the Applicant").

2.0 PROPOSAL OVERVIEW

2.1 The Project Area is approximately 54 hectares and is legally described as Lot 1 DPS 79016, Lot 1 DPS 9149 and Lot 1 DP 24870 located at 319 Gordonton Road in Rototuna. It is immediately adjacent to the north-eastern fringe of Hamilton City.

2.2 The Applicant is considering including 18A Haynes Place in the application and so for the purpose of this consultation, please consider that it may or may not be included in the final proposal.

2.3 The Project is a comprehensively master-planned, residential neighbourhood and directly responds to sustained housing demand in the Waikato region. An indicative masterplan has been developed for the Project by Earl Design (refer to **Attachment A**).

2.4 The Project has been deliberately designed to deliver a significant quantum of housing, and a range of housing options, in a highly accessible location, while contributing to a logical expansion of the Hamilton metropolitan area.

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

(a) 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;

(b) 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;

(c) An open space and green–blue network, incorporating low-lying areas, a neighbourhood park, 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.

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.

3.0 THE PROJECT SITES

3.1 The Project comprises the following sites.

Site Address	Legal Description	Record of Title	Area (ha)	Zoning (Waikato District Plan)
319 Gordonton Road	Lot 1 DPS 79016 (3.6562 ha) and Lot 1 DP 24870 (39.4568 ha)	SA63A/920	43.113 ha	General Rural Zone
	Lot 1 DPS 9149	SA3D/1116	10.8810 ha	

3.2 The following image depicts the relevant zoning:

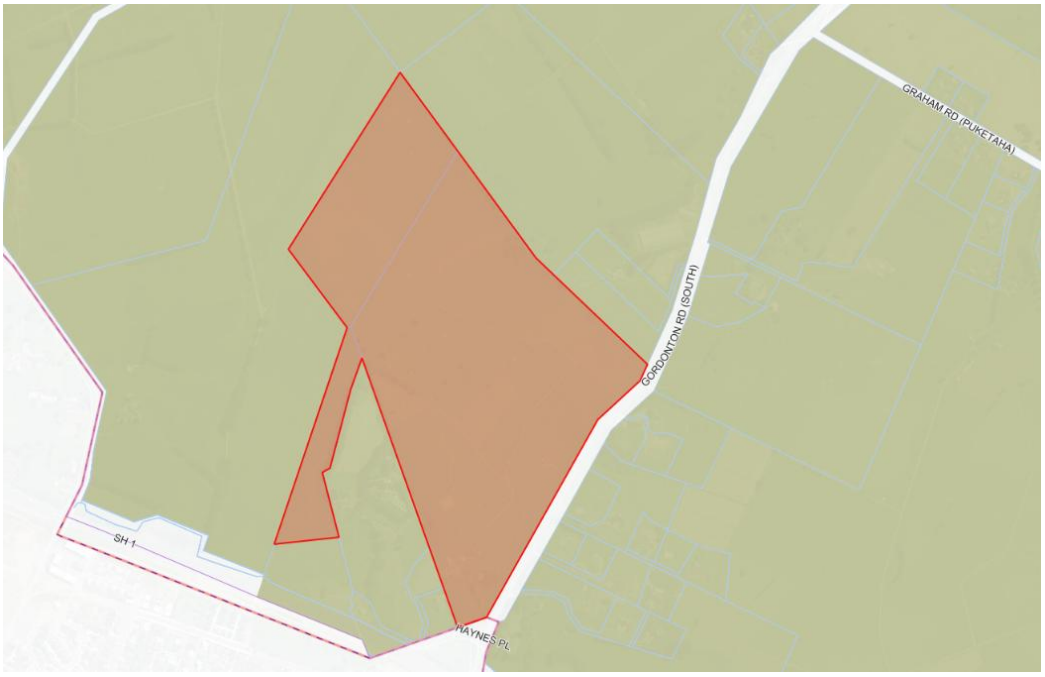


Figure: Zoning (Waikato District Plan) – General Rural Zone

4.0 DEVELOPMENT CONCEPT

Consents Triggered

4.1 At a high-level, the proposal would need resource consent for the following activities:

(a) Section 9 of the RMA - Land use consents for land modification, residential buildings and activities, neighbourhood centre building and activities and infrastructure works.

(b) Section 11 of the RMA – Subdivision.

(c) Section 14 of the RMA – Water Permits (Take and diversion).

(d) Section 15 of the RMA - Discharge Consents.

4.2 A range of triggers for resource consent will arise under the Waikato District Plan, the Waikato Regional Plan as well under various National Environmental Standards.

4.3 As the concept is still high level, we have not investigated in specific detail all the likely consents under the relevant Waikato District Plan and Waikato Regional Plan. However, from our high-level review, the application (overall) would likely trigger consent for a prohibited activity due to the subdivision rules in the Waikato District Plan.

4.4 The Applicant intends that application would include any approvals under other Acts (e.g wildlife and archaeological authority) The intended wildlife permit would be in relation to catching and releasing fauna as part of the expected ecological management plan and the archaeological authority would be a general authority in relation to unknown sites and potential European occupation of land and dwellings prior to 1900.

FTC Referral experts

4.5 To date, the following key experts have been engaged to provide technical advice and input into the working concept and the referral application:

(a) Landscape and Urban Design – Jack Earl

(b) Transport – BBO

(c) Civil Engineering - BBO

(d) Stormwater – BBO

(e) Ecology – Ecological Solutions

(f) Geotechnical - CMW

(g) Archaeological – CFG Heritage

(h) Economics – Urban Economics

Key Components of the Proposal

Archaeology

4.6 CFG Heritage's field assessment identifies no evidence of pre-European Māori archaeology. However, the Project Area is on the margins of known garden lands, the Komokorau bog and the former Lake Tunawhakapeka which would have been attractive locations for settlement. Therefore, archaeological evidence in the form of shell middens, cooking areas and postholes outlining drying racks, and small houses may be present.

4.7 This matter would be further addressed with the substantive application, including the requirement to implement the accidental discovery protocol should earthworks reveal any previously unknown archaeological sites.

4.8 It is possible that the existing villa pre-dates 1900. Further archival research and investigation by a building specialist are recommended to determine its likely date of construction. This matter would also be addressed by the substantive application.

Erosion and Sediment Control

4.9 Earthworks associated with the Project will be undertaken in accordance with best practice erosion and sediment control measures to ensure that any potential adverse effects are either avoided (where practicable) or minimised. This includes the rapid stabilisation of earthworked surfaces, sediment retention ponds, decanting earth bunds, stabilised construction entrances from main roads, silt fences, and clean and dirty water diversions.

4.10 These measures will be detailed in an erosion and sediment control plan that reflects the Waikato Regional Council's TR2009/02 requirements and their implementation will be regularly monitored by the contractor's project supervisor, site engineer, and Council representatives.

4.11 Any residual effects can and will be appropriately managed and mitigated through the implementation of a comprehensive Erosion and Sediment Control Plan.

4.12 The above measures will be addressed in detail with the substantive application to ensure the appropriate management of sediments and other contaminants that have the potential to be received by freshwater environments, including the Waikato River.

Stormwater Servicing

4.13 Stormwater will be managed in accordance with best practice methodologies, consistent with Waikato Regional Council's stormwater guidelines TR2020/06 and TR2020/07, the Waikato Regional Infrastructure Technical Specifications (RITS), and current requirements for climate change allowance.

4.14 Potential stormwater impacts are proposed to be managed in the following ways:

(a) Pipe networks for primary flows sized in accordance with the RITS to convey the 10-year storm peak rainfall (including allowance for climate change and potential blockages).

(b) Design secondary flow paths to safely convey the 100-year storm to the stream network, via roads or engineered overland flow paths.

(c) Stormwater quality treatment to ensure that development does not cause or increase stream pollution, including the construction of wetlands or raingardens.

(d) Attenuation storage to reduce peak flows discharged from the site.

(e) Hydrology mitigation – retention and extended detention to be typically provided within treatment wetlands so as to reduce stream flows in small, frequent storm events and without increasing stream erosion, and promoting groundwater recharge to maintain stream base flows.

Wastewater Servicing

4.15 The application is intended to enable two options:

(a) Connection to a public networks; OR

(b) A private wastewater treatment plant (WWTP) and private network.

4.16 A Membrane Bioreactor (MBR) or similar technology is expected to treat wastewater. These technologies can reliably achieve stringent nutrient and pathogen removal targets, consistent with best practice in New Zealand. Treated wastewater is expected to meet very high discharge standards, with >97% reductions in cBOD, TSS, TN, and TP, and near-complete pathogen removal.

4.17 Discharge will be via a polishing/land contact device prior to surface water discharge to a tributary (which will ultimately drain to the Waikato River); i.e. consent will be sought for discharge to land and water.

4.18 The Waikato River is a sensitive receiving environment subject to Te Ture Whaimana o Te Awa o Waikato. Discharge approaches will require cultural consultation, ecological assessment, and compliance with the new Wastewater Environmental Performance Standards (WEPS).

4.19 Effects from the discharge of treated wastewater will be carefully managed to ensure quality outputs align with the respective receiving environments. Specifically, the new technologies available for wastewater treatment plants enable the quality of treated wastewater to avoid adverse effects on water quality and aquatic ecology should discharges to waterbodies occur. Where disposal is to land, the rates of discharge and the design of the disposal area would account for primary and reserve fields, along with appropriate separation from groundwater.

4.20 The WWTP and reticulated network can be constructed by the Applicant and is not reliant on third party timing or funding.

4.21 Ownership and management of all wastewater infrastructure could be via private utility entity or a body corporate/residents' association. A clear ownership, operation and management framework will be required through the life of the resource consent, including provisions relating to operation, maintenance, repair and renewal of the assets.

4.22 There are numerous examples of consented/operating MBR WWTP in New Zealand, including those privately operated. Some of these include land contact devices prior to entering freshwater environments.

Water Supply

4.23 The application is intended to enable two options:

(a) Connection to a public networks; OR

(b) A private water treatment plant (WTP) and private network sourced from groundwater and on-lot rainwater tanks where possible[1].

4.24 The WTP and reticulated network can be constructed by the Applicant and is not reliant on third party timing or funding.

4.25 Ownership and management of all wastewater infrastructure could be via a private utility entity or body corporate/residents' association. A clear ownership, operation and management framework will be required through the life of the resource consent, including provisions relating to operation, maintenance, repair and renewal of the assets.

Land Stability

4.26 Earthworks can be managed to minimise land stability risks. This includes compliance with NZS4431:2022 compaction standards.

4.27 Where sensitive alluvial soils or elevated groundwater levels are encountered, they will be addressed through conventional drainage techniques, ground improvement methods (e.g. lime stabilisation, subgrade undercutting), and robust construction management practices to ensure stability of future building platforms and infrastructure.

Traffic

4.28 The site is well connected to the surrounding areas in Horsham Downs. The Project will create connections to:

(a) Haynes Place and Gordonton Road (vehicle and pedestrian);

(b) The current pedestrian facilities to the intersection of Haynes Place and Gordonton Road (directly opposite the site's frontage).

4.29 Roading cross sections and intersection design will be determined as part of the substantive application process, however, these are able to meet the relevant RITS.

[1] On lot re-use is also likely in the event of a connection to a public network to align with Te Ture Whaimana o Te Awa o Waikato

TOLLEMACHE CONSULTANTS LTD.

From: Tollemache Consultants Limited

Date: May 2026

Subject: Horsham Downs Estate (319 Gordonton Road, Rototuna)

Overview of the Proposal for Referral Application for consultation with Iwi Authorities and Treaty Settlement Entities

---

1.0 INTRODUCTION

1.1 This memorandum provides a high-level outline of the proposal sought in respect of the Horsham Downs Estate Project which is intended to be lodged as a Referral Application under the Fast Track Approvals Act 2024 ("FTAA"), by Horsham Downs Estate Limited ("the Applicant").

2.0 PROPOSAL OVERVIEW

2.1 The Project Area is approximately 54 hectares and is legally described as Lot 1 DPS 79016, Lot 1 DPS 9149 and Lot 1 DP 24870 located at 319 Gordonton Road in Rototuna. It is immediately adjacent to the north-eastern fringe of Hamilton City.

2.2 The Applicant is considering including 18A Haynes Place in the application and so for the purpose of this consultation, please consider that it may or may not be included in the final proposal.

2.3 The Project is a comprehensively master-planned, residential neighbourhood and directly responds to sustained housing demand in the Waikato region. An indicative masterplan has been developed for the Project by Earl Design (refer to **Attachment A**).

2.4 The Project has been deliberately designed to deliver a significant quantum of housing, and a range of housing options, in a highly accessible location, while contributing to a logical expansion of the Hamilton metropolitan area.

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

(a) 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;

(b) 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;

(c) An open space and green–blue network, incorporating low-lying areas, a neighbourhood park, 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.

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.

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3.2 The following image depicts the relevant zoning:

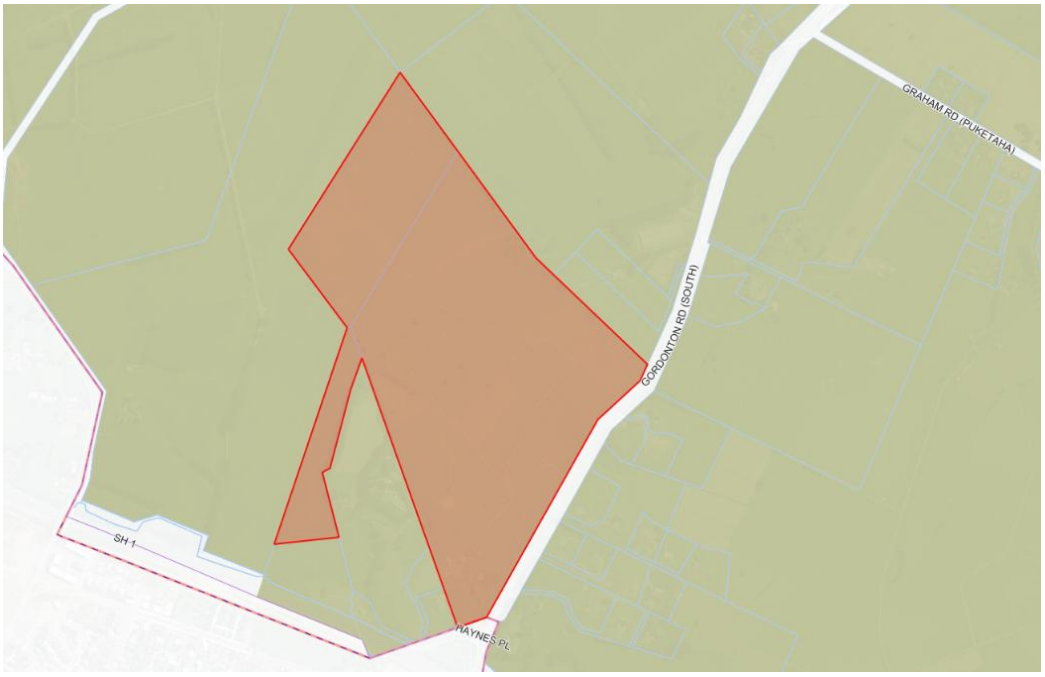


Figure: Zoning (Waikato District Plan) – General Rural Zone

4.0 DEVELOPMENT CONCEPT

Consents Triggered

4.1 At a high-level, the proposal would need resource consent for the following activities:

(a) Section 9 of the RMA - Land use consents for land modification, residential buildings and activities, neighbourhood centre building and activities and infrastructure works.

(b) Section 11 of the RMA – Subdivision.

(c) Section 14 of the RMA – Water Permits (Take and diversion).

(d) Section 15 of the RMA - Discharge Consents.

4.2 A range of triggers for resource consent will arise under the Waikato District Plan, the Waikato Regional Plan as well under various National Environmental Standards.

4.3 As the concept is still high level, we have not investigated in specific detail all the likely consents under the relevant Waikato District Plan and Waikato Regional Plan. However, from our high-level review, the application (overall) would likely trigger consent for a prohibited activity due to the subdivision rules in the Waikato District Plan.

4.4 The Applicant intends that application would include any approvals under other Acts (e.g wildlife and archaeological authority) The intended wildlife permit would be in relation to catching and releasing fauna as part of the expected ecological management plan and the archaeological authority would be a general authority in relation to unknown sites and potential European occupation of land and dwellings prior to 1900.

FTC Referral experts

4.5 To date, the following key experts have been engaged to provide technical advice and input into the working concept and the referral application:

(a) Landscape and Urban Design – Jack Earl

(b) Transport – BBO

(c) Civil Engineering - BBO

(d) Stormwater – BBO

(e) Ecology – Ecological Solutions

(f) Geotechnical - CMW

(g) Archaeological – CFG Heritage

(h) Economics – Urban Economics

Key Components of the Proposal

Archaeology

4.6 CFG Heritage's field assessment identifies no evidence of pre-European Māori archaeology. However, the Project Area is on the margins of known garden lands, the Komokorau bog and the former Lake Tunawhakapeka which would have been attractive locations for settlement. Therefore, archaeological evidence in the form of shell middens, cooking areas and postholes outlining drying racks, and small houses may be present.

4.7 This matter would be further addressed with the substantive application, including the requirement to implement the accidental discovery protocol should earthworks reveal any previously unknown archaeological sites.

4.8 It is possible that the existing villa pre-dates 1900. Further archival research and investigation by a building specialist are recommended to determine its likely date of construction. This matter would also be addressed by the substantive application.

Erosion and Sediment Control

4.9 Earthworks associated with the Project will be undertaken in accordance with best practice erosion and sediment control measures to ensure that any potential adverse effects are either avoided (where practicable) or minimised. This includes the rapid stabilisation of earthworked surfaces, sediment retention ponds, decanting earth bunds, stabilised construction entrances from main roads, silt fences, and clean and dirty water diversions.

4.10 These measures will be detailed in an erosion and sediment control plan that reflects the Waikato Regional Council's TR2009/02 requirements and their implementation will be regularly monitored by the contractor's project supervisor, site engineer, and Council representatives.

4.11 Any residual effects can and will be appropriately managed and mitigated through the implementation of a comprehensive Erosion and Sediment Control Plan.

4.12 The above measures will be addressed in detail with the substantive application to ensure the appropriate management of sediments and other contaminants that have the potential to be received by freshwater environments, including the Waikato River.

Stormwater Servicing

4.13 Stormwater will be managed in accordance with best practice methodologies, consistent with Waikato Regional Council's stormwater guidelines TR2020/06 and TR2020/07, the Waikato Regional Infrastructure Technical Specifications (RITS), and current requirements for climate change allowance.

4.14 Potential stormwater impacts are proposed to be managed in the following ways:

(a) Pipe networks for primary flows sized in accordance with the RITS to convey the 10-year storm peak rainfall (including allowance for climate change and potential blockages).

(b) Design secondary flow paths to safely convey the 100-year storm to the stream network, via roads or engineered overland flow paths.

(c) Stormwater quality treatment to ensure that development does not cause or increase stream pollution, including the construction of wetlands or raingardens.

(d) Attenuation storage to reduce peak flows discharged from the site.

(e) Hydrology mitigation – retention and extended detention to be typically provided within treatment wetlands so as to reduce stream flows in small, frequent storm events and without increasing stream erosion, and promoting groundwater recharge to maintain stream base flows.

Wastewater Servicing

4.15 The application is intended to enable two options:

(a) Connection to a public networks; OR

(b) A private wastewater treatment plant (WWTP) and private network.

4.16 A Membrane Bioreactor (MBR) or similar technology is expected to treat wastewater. These technologies can reliably achieve stringent nutrient and pathogen removal targets, consistent with best practice in New Zealand. Treated wastewater is expected to meet very high discharge standards, with >97% reductions in cBOD, TSS, TN, and TP, and near-complete pathogen removal.

4.17 Discharge will be via a polishing/land contact device prior to surface water discharge to a tributary (which will ultimately drain to the Waikato River); i.e. consent will be sought for discharge to land and water.

4.18 The Waikato River is a sensitive receiving environment subject to Te Ture Whaimana o Te Awa o Waikato. Discharge approaches will require cultural consultation, ecological assessment, and compliance with the new Wastewater Environmental Performance Standards (WEPS).

4.19 Effects from the discharge of treated wastewater will be carefully managed to ensure quality outputs align with the respective receiving environments. Specifically, the new technologies available for wastewater treatment plants enable the quality of treated wastewater to avoid adverse effects on water quality and aquatic ecology should discharges to waterbodies occur. Where disposal is to land, the rates of discharge and the design of the disposal area would account for primary and reserve fields, along with appropriate separation from groundwater.

4.20 The WWTP and reticulated network can be constructed by the Applicant and is not reliant on third party timing or funding.

4.21 Ownership and management of all wastewater infrastructure could be via private utility entity or a body corporate/residents' association. A clear ownership, operation and management framework will be required through the life of the resource consent, including provisions relating to operation, maintenance, repair and renewal of the assets.

4.22 There are numerous examples of consented/operating MBR WWTP in New Zealand, including those privately operated. Some of these include land contact devices prior to entering freshwater environments.

Water Supply

4.23 The application is intended to enable two options:

(a) Connection to a public networks; OR

(b) A private water treatment plant (WTP) and private network sourced from groundwater and on-lot rainwater tanks where possible[1].

4.24 The WTP and reticulated network can be constructed by the Applicant and is not reliant on third party timing or funding.

4.25 Ownership and management of all wastewater infrastructure could be via a private utility entity or body corporate/residents' association. A clear ownership, operation and management framework will be required through the life of the resource consent, including provisions relating to operation, maintenance, repair and renewal of the assets.

Land Stability

4.26 Earthworks can be managed to minimise land stability risks. This includes compliance with NZS4431:2022 compaction standards.

4.27 Where sensitive alluvial soils or elevated groundwater levels are encountered, they will be addressed through conventional drainage techniques, ground improvement methods (e.g. lime stabilisation, subgrade undercutting), and robust construction management practices to ensure stability of future building platforms and infrastructure.

Traffic

4.28 The site is well connected to the surrounding areas in Horsham Downs. The Project will create connections to:

(a) Haynes Place and Gordonton Road (vehicle and pedestrian);

(b) The current pedestrian facilities to the intersection of Haynes Place and Gordonton Road (directly opposite the site's frontage).

4.29 Roading cross sections and intersection design will be determined as part of the substantive application process, however, these are able to meet the relevant RITS.

[1] On lot re-use is also likely in the event of a connection to a public network to align with Te Ture Whaimana o Te Awa o Waikato

Te Ture Whaimana o Te Awa o Waikato

4.30 The Project will assist in achieving Te Ture o Te Awa o Waikato including via the following methods:

(a) The Project has integrated land use, water management, community wellbeing and consideration of the effects of climate change. Integration between these in the proposed concept plan results in comprehensively designed neighbourhood for residential development and blue/green corridors for waterways and ecological offsetting.

(b) The stormwater solutions account for climate change, and will ensure that contaminants are treated.

(c) The development includes opportunities for restoration and enhancement of water runoff from the site which will help restore water quality and ecological integrity of waterways. This includes removing stock from the site.

(d) Discharges will be managed to ensure that the health and wellbeing of the relevant tributaries where discharges will occur and the Waikato River is protected and restored (including recreational quality).

(e) The project enables integrated management of effects on land and water and provides an opportunity to restore and enhance the mauri of water.

(i) Stormwater can be managed through treatment devices and appropriate detention to manage flooding (and also stream erosion) in accordance with best practice and Council design guidelines.

(ii) Wastewater can be managed through land-based treatment by an MBR (or similar device). The treatment quality to be achieved from the device will be tailored to the receiving environment including treatment to a higher standard than the current receiving environment.

(iii) Erosion and sediment controls during will be implemented in accordance with best practice and Council design guidelines.

(f) The direct benefits of changing land use activities from grazing will also be beneficial to the quality of the freshwater environment including the Waikato River and tributaries of the Waikato River.

4.31 The above methods are in recognition of the strategic importance of the Waikato River to New Zealand's, social, cultural, environmental and economic wellbeing. The above measures ensure that the relationship of Waikato-Tainui with the Waikato River, including their economic, social, cultural and spiritual relationships are provided for.

Attachment B:

19 June 2026

To: Horsham Downs Estate Limited c/o Tollemache Consultants Limited

CC: Miffy Foley, Waikato Regional Council
Mark Rushworth, New Zealand Transport Authority
Chris Dillon, Hamilton City Council

Dear Mark Tollemache,

Re: Statement of Facts in relation to the Horsham Downs Estate Fast-track Referral Application

Thank you for meeting with Waikato District Council (WDC), Waikato Regional Council (WRC), Hamilton City Council (HCC), and New Zealand Transport Authority (NZTA) on 3 June 2026 to discuss the fast-track referral application for Horsham Downs Estate.

This letter records the matters discussed in relation to the proposed referral application and confirms that engagement has occurred with WDC and WRC as the relevant local authorities under section 11(1)(a) of the Fast-track Approvals Act 2024 (FTAA), and with HCC and NZTA as key stakeholders in relation to transport and infrastructure matters.

WDC notes that this engagement is at a preliminary stage and, if the referral application is accepted, asks that the Applicant continue to work closely with all relevant agencies on land use, infrastructure, transport, servicing, ecological, and other technical matters.

WDC and HCC have jointly agreed to establish an asset-owning waters services council-controlled organisation, IAWAI – Flowing Waters Limited (IAWAI), pursuant to the Local Government (Water Services) Act 2025. From its establishment on 1 July 2026, IAWAI will need to be involved in future discussions relating to three-waters servicing for Horsham Downs Estate.

Statement of Facts
We record the following matters in relation to the referral application for the subject site:

1. Horsham Downs Estate (the subject site) is located at 319 Gordonton Road, on land immediately adjacent to the north-eastern edge of Hamilton City. The project area is approximately 54 hectares and is legally described as Lot 1 DPS 79016, Lot 1 DPS 9149, and Lot 1 DP 24870, with possible inclusion of 18A Haynes Place.

2. The proposal is described as a comprehensively master-planned residential neighbourhood intended to respond to sustained housing demand in the Waikato region. At a high level, it is intended to provide approximately 850–950 dwellings, a neighbourhood centre, open space and green-blue networks, and associated infrastructure.

Land Use considerations

3. The subject site is currently zoned General Rural in the Waikato District Plan. The site has not been identified for future development in the Future Proof Strategy or Waikato 2070 (Waikato District Growth and Economic Development Strategy).

4. The proposal contemplates a significant quantum of residential growth and a neighbourhood centre in a currently rural location. WDC expects the referral application to clearly demonstrate how the proposal will increase housing supply, address housing need, and deliver significant regional housing and economic benefits consistent with section 22 of the Fast-track Approvals Act 2024.

5. Any substantive application will need to clearly address the implications of urban development in this location, including consistency with strategic planning documents, urban growth sequencing, and the relationship with Hamilton's metropolitan edge.

6. Datasets from Manaaki Whenua and Waikato Regional Council both indicate that the northern and eastern portions of the site might be classified as Highly Productive Land (LUC Class 2). Relevant processes and assessments required under the National Policy Statement for Highly Productive Land will need to be incorporated into the application.

Transport considerations

7. The proposal has the potential to generate significant transport effects on Gordonton Road, Haynes Place, State Highway 1 connections, and the wider surrounding transport network. WDC expects an Integrated Traffic Assessment to address trip generation, distribution, network effects, intersection performance, active mode connections, and staging.

8. Roading design, intersection treatments, pedestrian and cycling connections, and any transport assets proposed to be vested to WDC will be expected to align with the Waikato Regional Infrastructure Technical Specifications (RITS), unless an accepted alternative solution is approved.

9. Public transport availability, walking and cycling connectivity, and safe access to surrounding destinations will require further consideration as the proposal is developed.

Water, Wastewater and Stormwater considerations

10. Whether the site can be serviced will need to be confirmed in consultation with IAWAI, as self-supply would place significant obligations and liabilities on the provider.

11. The proposal identifies potential servicing options including connection to public networks or provision of private water and wastewater treatment infrastructure. WDC expects the substantive application to clearly demonstrate the feasibility, funding, ownership, operation, maintenance, and long-term management of all three waters infrastructure.

12. There is an existing water supply scheme in the area, but it is not currently considered suitable to service the site at the proposed scale. The area is also classed as a Restricted Water Supply Area under WDC's Water Supply Bylaw 2023, and the existing restricted-flow connections may not meet expected demand or firefighting needs.

13. WDC recommends discussing any surface water or groundwater needs with WRC early, so that potential issues can be identified and understood. These may include overallocation, declining groundwater levels, effects on nearby properties, and contamination from wastewater discharges.

14. Stormwater management will need to be addressed in accordance with current best practice, including the Waikato Regional Council stormwater guidance, RITS requirements, climate change allowances, flood conveyance, water quality treatment, attenuation, and hydrological mitigation.

15. Wastewater discharge proposals, including any private wastewater treatment plant and discharge to land or water, will require detailed technical, ecological, cultural, and regulatory assessment, particularly given the sensitivity of downstream receiving environments connected to the Waikato River.

Parks, Open Space and Ecology considerations

16. The proposal includes open space, landscape buffers, wetlands, and a neighbourhood park. WDC welcomes further discussion regarding the function, location, ownership, and any potential vesting of public open space assets, together with the consideration of long-term maintenance implications of those assets.

17. Ecological values, watercourse works, wetland impacts, and any required offsetting or enhancement measures will need to be assessed and addressed through the substantive application.

Affected Neighbouring Landowners/ Reverse Sensitivity

18. The proposed change in land use from rural to urban-scale development has the potential to affect adjoining landowners and the wider area through matters such

as reverse sensitivity, visual change, traffic, lighting, noise, and construction effects.

19. The substantive application should also address the potential for existing and ongoing rural activities and environmental conditions in the surrounding area to affect the amenity, health, and wellbeing of future urban residents, and demonstrate how these interfaces and reverse sensitivity matters will be appropriately managed.

20. If the referral is accepted, WDC recommends that these effects, and the scope of engagement with neighbouring landowners, are carefully considered through the substantive application process.

Closing

21. This letter is a summary statement of facts relating to the proposal. It does not constitute support for the proposal and should not be taken to predetermine any future position in relation to a substantive application. It is intended to help inform consideration of the Horsham Downs Estate referral application and to record the engagement undertaken to date.

22. WDC records its appreciation of the Applicant's willingness to engage in relation to the fast-track referral application. WDC asks that this engagement continue and that all relevant local authorities, HCC, and agencies remain involved as key stakeholders as the proposal develops.

Yours sincerely,



Hazel Coalter
Planning and Growth Manager

Attachment C:

Hamilton City Council
Te kaunihera o Kirikiriroa

Private Bag 3010
Hamilton 3240
New Zealand

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EMAIL info@hcc.govt.nz
hamilton.govt.nz

16 June 2026

To: Mark Tollemache

CC: Miffy Foley, Waikato Regional Council
Donna Tracey, Waikato District Council
Mark Rushworth, New Zealand Transport Agency

RE: Letter to Horsham Downs Applicant - FTAA Section 11(1)(b) Response

Dear Mark,

Thank you for meeting with Hamilton City Council (HCC) and its Future Proof Partners – Waikato District Council (WDC), Waikato Regional Council (WRC), and New Zealand Transport Agency (NZTA) on 3 June 2026 to discuss your Fast-track Referral Application for Horsham Downs. This letter reaffirms that you have notified HCC, WDC and WRC as a "relevant local authority" under section 11(1)(b) of the Fast-track Approvals Act 2024 (FTAA).

HCC, WDC, and WRC currently maintain an ongoing Fast-track Programme which has been deployed across all other applications, from which comprehensive engagement for each project is consistently provided. Should the application be referred, it is strongly recommended that you engage with us prior to lodging any substantive application. This engagement would need to follow an agreed process, acknowledging the practical necessity of balancing the time devoted to your proposal against the considerable volume of other proposals and applications currently being managed. This engagement on other applications has proven to mutually beneficial so far with other applicants and will significantly enhance the probability of your application proceeding relatively smoothly through the entire process.

Based on the information provided to date, HCC notes the following critical issues that are highly relevant to this application:

1. **Section 22 Analysis**
   Determining whether a project falls within the scope of Section 22 is a critical consideration for both the Minister and the Expert Panel during their assessment. In this context, the following factors may be considered:

   - 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).
   - Will deliver significant economic benefits.
   - Is consistent with local or regional planning documents, including spatial strategies.

- Based on a preliminary assessment, while the proposal is likely to contribute to increased housing supply and provide economic benefits, it appears to be inconsistent with the Future Proof Strategy 2024 and the Waikato District Plan. The absence of strategic identification means any necessary infrastructure upgrades are unlikely to be planned or funded at this stage.

Building on this, there is also a broader strategic consideration for Hamilton that may be relevant. There is already sufficient existing residential capacity within Hamilton, which is now being further supplemented by a number of Fast Track applications that have either been listed or referred. Taken together, these projects represent a substantial and growing pipeline of potential development capacity across the city and surrounding growth areas.

In that context, enabling additional capacity through Fast Track – particularly in the absence of clear staging, infrastructure alignment, and delivery mechanisms – may not translate into timely development, and could instead contribute to land banking.

This risk is further heightened by the scale of the existing pipeline in the proximity of this application, including developments such as Ruakura Growth Cell 2 and Orchard Grove, which collectively represent more than 30 years of supply. In practical terms, this places increasing pressure on finite infrastructure capacity – particularly water and wastewater – which is already constrained and will require careful prioritisation and sequencing to achieve coordinated and efficient growth outcomes.

Additionally, when compared with a standard plan change under Schedule 1 of the Resource Management Act 1991 (RMA), the FTAA provides fewer opportunities to pause the process once an application has been lodged. Under section 28(3) of the FTAA, an applicant (by default) must lodge a substantive application within two years, meaning any necessary consultation or assessment should be planned in advance.

Given the current information gaps, pursuing a standard Schedule 1 RMA plan change process may be more appropriate, as it would allow additional time to address infrastructure-related issues.

2. **Project Boundary**

Paragraph 2.2 of the proposal document indicates that the inclusion of 18A Haynes Place remains unresolved. It should be noted that the FTAA does not provide any mechanism for expanding the scope of a project once it has been lodged; only reductions are permissible (refer Section 68A). Accordingly, the inclusion of the above-mentioned site must be confirmed prior to lodgement, otherwise any inclusion of the subject property would be considered out of scope and potentially jeopardises the application.

3. **Highly Productive Land**

Datasets from Manaaki Whenua and Future Proof both indicate that the northern portion of the site might be classified as Highly Productive Land (LUC Class 2, refer to Figure 1). Relevant processes and assessments required under the National Policy Statement for Highly Productive Land will need to be incorporated into the application.

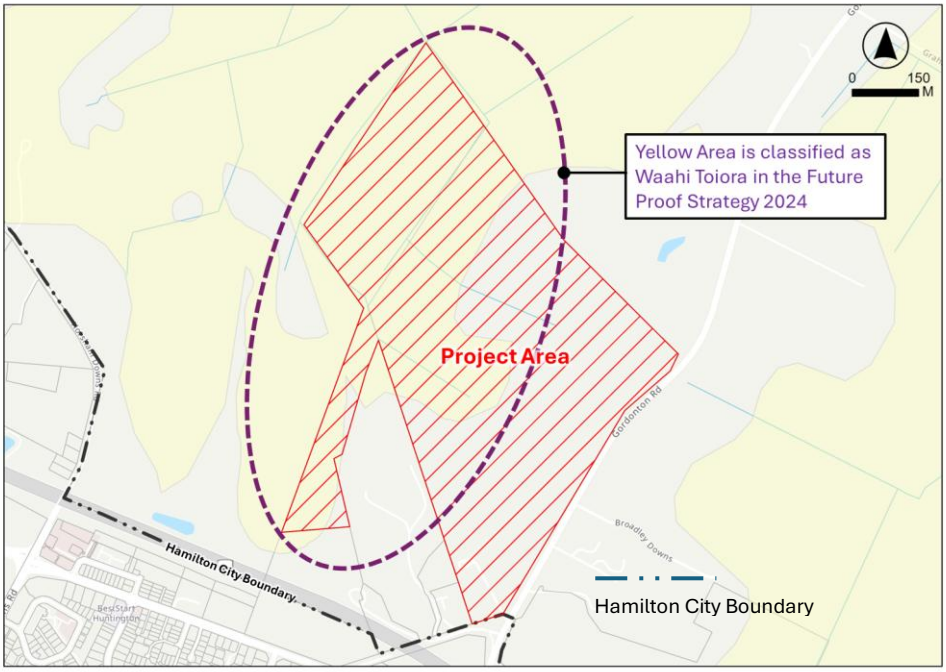


Figure 1 – Indicative Map showing Potential Waahi Toiora/LUC Class 2 Areas

4. Reverse Sensitivity

Considering the predominantly rural setting surrounding the site, the proposed development may give rise to reverse sensitivity effects. To address these potential impacts, appropriate mitigation measures - such as incorporating buffer zones of green space - will be necessary.

Furthermore, due to the scale of the proposal and the site's proximity to the SH1 Waikato Expressway, there may be implications for the operation of the state highway. This will likely necessitate additional buffering and controls to address potential noise effects, including appropriate noise insulation measures.

5. Transport

HCC would note the following issues related to transport:

- A preliminary assessment suggests that the proposed development will place immediate pressure on Gordonton Road. However, due to limited available information, it is uncertain whether the existing road has adequate capacity or if upgrades will be necessary.
- There are no bus routes directly serving the site, and no bus stops are located within reasonable walking distance (approximately 400 meters, refer to Figure 2). As a result, future residents are likely to rely primarily on private vehicles, which may place additional pressure on the Haynes Place/Gordonton Road intersection. Consequently, an upgrade to this intersection may be required.

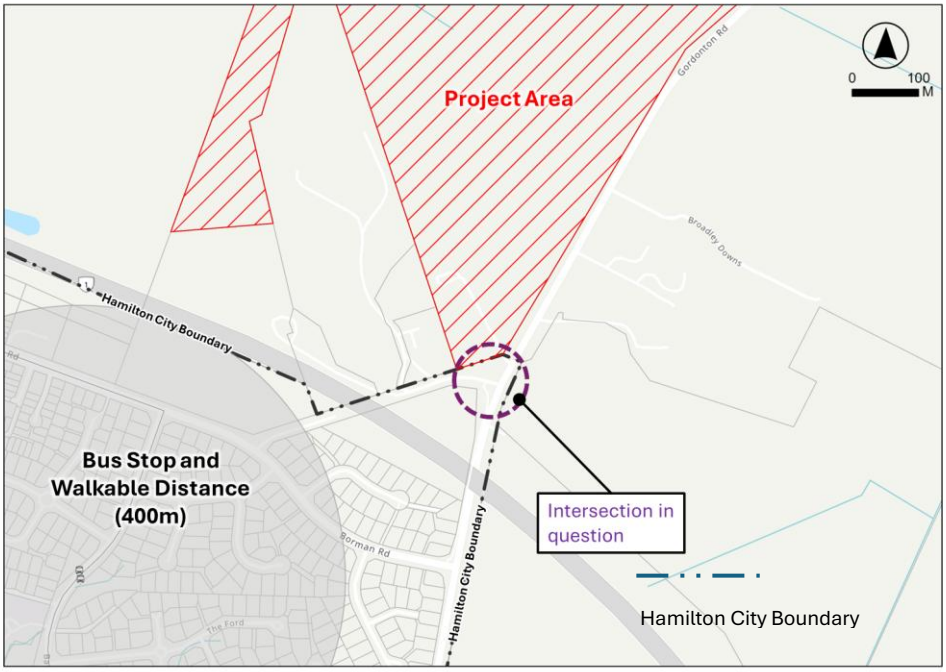


Figure 2 – Indicative Map highlighting Nearest Bus Stop and Haynes Place/Gordonton Road Intersection

6. Water and Wastewater

Hamilton's water network currently ends around Borman Road, and HCC Master plans for Water (and Wastewater separately) make no provision for servicing the subject area which sits outside of HCC boundary. A significant issue is how the site would be serviced (refer to Figure 3). Whether the site can be serviced will need to be confirmed in consultation with IAWAI – Flow Waters (IAWAI) as self-supply will place significant obligations and liabilities on the provider.

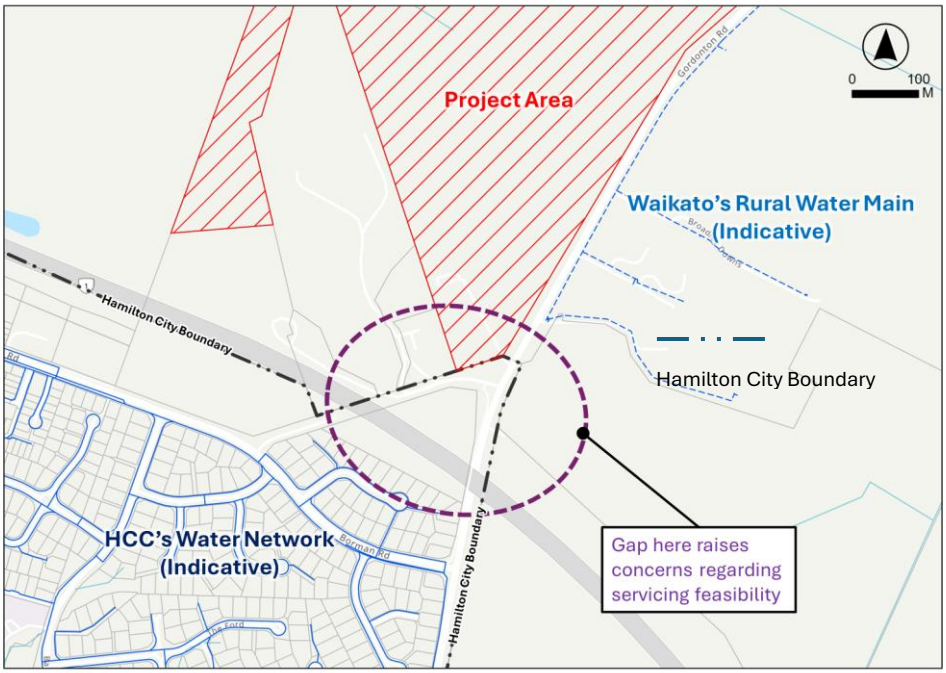


Figure 3 – Indicative Water and Wastewater Servicing Map

Wastewater servicing presents similar constraints to those identified for water supply. HCC has consistently maintained its position that it will not support decentralised wastewater systems. IAWAI as a newly formed water services CCO of HCC and WDC is drafting and considering their policy positions.

Accordingly, any interim or localised wastewater treatment solutions would need to remain in private ownership and be appropriately managed for the entirety of their operational life. Conditions on the property titles should include maintenance costs for running the microbioreactor/aeration plants which will be covered by the new property owners, until the wastewater can be connected into the public network.

HCC has indicated that no significant water or wastewater capacity currently exists, nor is planned, east of the Waikato Expressway. Given the out-of-sequence nature of the proposed development, a more comprehensive strategy outlining short- and medium-term infrastructure solutions will be required.

7. **Stormwater**
   Stormwater management will need to be clearly demonstrated within any substantive application, including how proposed infrastructure within the subject site integrates with the wider surrounding catchment and mitigates effects for example in respect of quantity (run-off) and quality for discharges, and ecology/habitat/environment. At present, it remains unclear how stormwater is intended to be managed, as the proposed artificial wetland's function and design have yet to be adequately defined. While there appears to be existing drainage infrastructure in place, neither its capacity nor its suitability for supporting the proposed development has been confirmed.

   It should also be noted that any modification to existing drains or watercourses is subject to specific regulatory processes and will require consultation with the Waikato Regional Council.

   Additionally, note that any application that ultimately discharges to the Waikato River must comply with the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010, namely to:

   - Have particular regard to Te Ture Whaimana
   - Give notice to the Waikato River Authority of the application
   - Have regard to the Waikato-Tainui Environmental Plan

Under the FTAA framework, WDC is the "relevant local authority". However, HCC is likely to be directly affected by the application, particularly if there is a preference to connect to the City's reticulated water services and transport networks, which are located in close proximity to the site.

In this context, it will be important for HCC to be closely involved in ongoing discussions and in the preparation of any substantive application. Accordingly, HCC, together with its partners, will seek to formalise the recovery of costs associated with this involvement through a Cost Recovery Agreement.

This correspondence is intended as a high-level summary of the key matters relevant to the proposal. It should not be interpreted as predetermining any future outcomes or positions arising from further engagement. Rather, it is provided to ensure that any consideration of a referral application is appropriately informed, including HCC's potential involvement.

HCC expects that engagement will continue in a constructive manner, and that both HCC and the wider Future Proof partners are recognised and appropriately involved as key stakeholders throughout this process.

Yours sincerely,



Dr Juliana Reu Junqueira
Director - Urban and Spatial Planning Unit

Hamilton City Council
Te kaunihera o Kirikiriroa