

To: Ministry for the Environment (MfE)

From: Fraser McNutt – Barker & Associates Limited

Date: 12 February 2026

Re: Planning Memorandum for **Greenhill Industrial Park**

1.0 Introduction

1.1 Greenhill Industrial Park

Barker & Associates (**B&A**) has been engaged by Greenhill Industrial Park Consortium (Finlay Family Partnership, GT Taylor Family Trust, Finaly Family Partnership, and McDonald Farming Enterprises Limited) to provide planning services for the masterplanning, design, and consenting of **Greenhill Industrial Park**. Greenhill Industrial Park is located near the western fringe of the Waikato District, less than 10 kilometres from the Hamilton City Centre and less than one kilometre from the Hamilton City territorial boundary. The conceptual Greenhill Industrial Park Masterplan is shown in **Figure 1**.



Figure 1: Conceptual Greenhill Industrial Park Masterplan.

The purpose of this project is to establish a new industrial park in a strategic location close to existing regional transport infrastructure. The key components to Greenhill Industrial Park are:

- Approximately 161 new industrial lots, ranging in size from 2,500m² to 1 hectare and above;
- 25 new rural residential lots located at the southern boundary adjoining Greenhill Road and towards the northern side of the site adjacent to Puketaha Road;
- A new north-south orientated collector road, connecting with Puketaha Road to the north and Greenhill Road to the south, and a series of new local roads; and
- Four distinct stormwater pond areas, including a larger centralised area that will also contain a new central wastewater pumpstation.

Greenhill Industrial Park comprises six stages which are aligned with provision for stormwater and transport infrastructure.

1.2 Site Description

The site (**Figure 2**) is an irregular shape and approximately 180 hectares. It is situated within the Waikato District, adjacent to the eastern side of the Waikato Expressway. The site is accessed from Puketaha Road to the north and Greenhill Road to the south. The Waikato District and Hamilton City jurisdiction boundary is defined by Gordonton Road, which is located approximately 1 kilometre to the west of the Waikato Expressway. The urban area of Rototuna in Hamilton City is located on the other side of Gordonton Road. The area located between the Waikato Expressway and Gordonton Road is an identified urban expansion growth cell, referred to as Ruakura 2 or 'R2'.

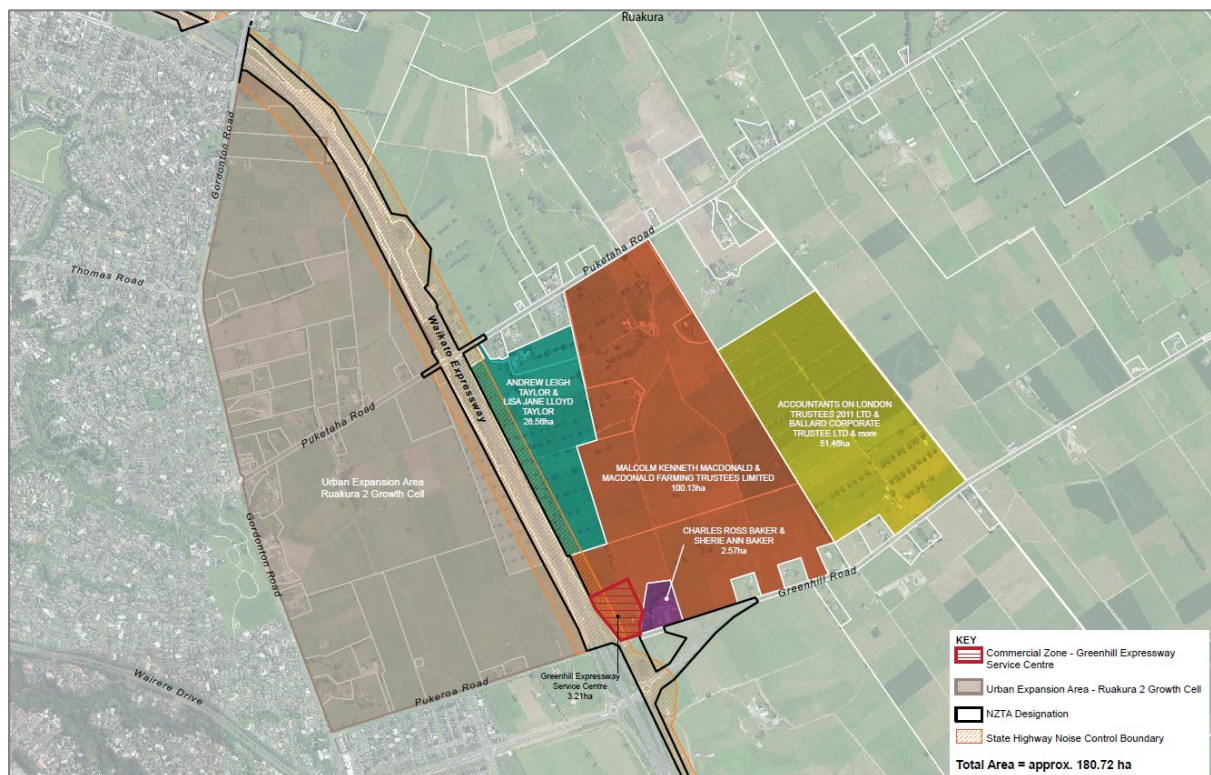


Figure 2: Site locality plan.

Greenhill Industrial Park is directly connected to the State Highway network via the Waikato Expressway and through adjacent on and off ramps in both directions located off Greenhill Road and Pardoia Boulevard.

A service centre is proposed at the south western corner of the site at 133 Greenhill Road, and this area is annotated in pink in the Masterplan shown at **Figure 1**. This land is subject to a separate resource consent made under the Resource Management Act 1991 (RMA) for a service centre activity and subdivision to create a separate title. This area is not subject to any development under the Greenhill Industrial Park masterplan nor this application. The expectation is that any use, development, and subdivision of this land will occur outside of the Fast-track process.

1.3 Records of Title and Interests

The site consists of the Records of Title as identified in **Figure 3** and **Table 1** below.

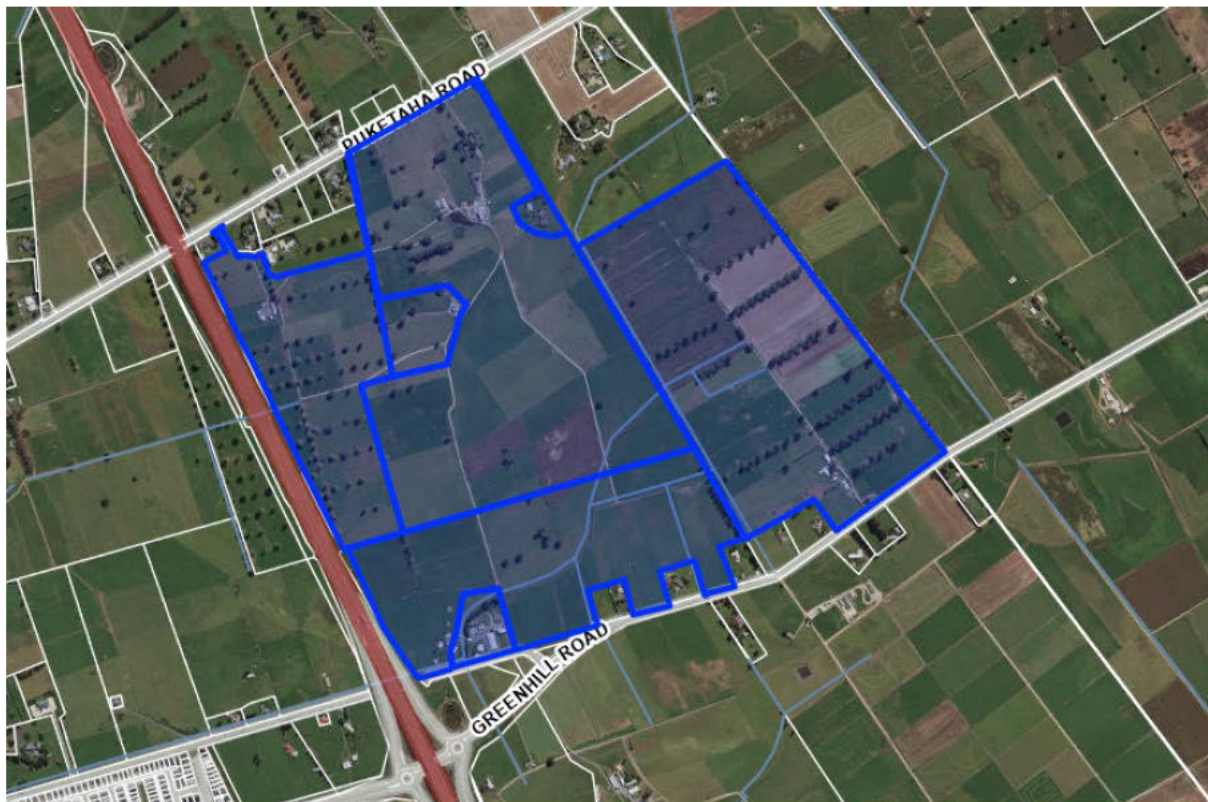


Figure 3: Site locality (source: Emap).

Table 1: Legal description of the site.

Legal Description and Address	Area (Hectares)	Landowner
Lot 1 DP 515771 192B Puketaha Road	23.2460	s 9(2)(a)
Lot 1 DP South Auckland 15954 154 Puketaha Road	4.4363	s 9(2)(a)
Lot 2 DP 307097 182 Puketaha Road	60.7820	s 9(2)(a)

Legal Description and Address	Area (Hectares)	Landowner
Lot 1 DP 307097 192 Puketaha Road	1.4460	s 9(2)(a)
Lot 3 DP 456019 257 Greenhill Road	51.4443	s 9(2)(a)
Section 88 Survey Office Plan 572875 133 Greenhill Road	33.4700	s 9(2)(a)
Lot 1 DP 304594 135 Greenhill Road	2.5670	s 9(2)(a)

The Records of Title for the site are subject to a number of interests (refer **Attachment 1**) and as detailed below). Overall, there are no interests which will prevent the proposed project from being undertaken.

Table 2: Existing interests.

Interest	Comment
192B Puketaha Road - 846470	
Easement Instrument 9068698.3	The easement will be superseded by the proposed development.
Gazette Notice 10034225.1	The gazette notice is in relation to easement instrument 9068698.3 which will be superseded by the proposed development.
10296196.1 Encumbrance	The encumbrance is in relation to the adjoining State Highway network and will not prevent the proposed project from being undertaken.
Part IVA Conservation Act 1987	This interest under the Conservation Act 1987 will not restrict or preclude development or subdivision activities from occurring within the site.
Section 11 Crown Minerals Act 1991	This interest under the Crown Minerals Act 1991 will not restrict or preclude development or subdivision activities from occurring within the site.
Easement Instrument 11165347.3	The easement will be superseded by the proposed development.
154 Puketaha Road - SA16C/776	
N/A – there are no relevant interests registered to this record of title	
Lot 2 DP 307097 – 27559	
N/A – there are no relevant interests registered to this record of title	
192 Puketaha Road – 27558	
N/A – there are no relevant interests registered to this record of title	
257 Greenhill Road – 587943	

Interest	Comment
Transfer B184931.7	Transfer B184931.7 1987 will not restrict or preclude development or subdivision activities from occurring within the site and will be superseded by the proposed development.
Easement Instrument 10763338.3	The easement schedule relates to a private covenant which will be superseded by the proposed development and will be addressed outside of the FTAA.
133 Greenhill Road – 1177690	
5210644.1 Consent Notice	The consent notice relates to the detailed design of residential foundations and the on-site wastewater treatment and disposal system within the lot. The requirements of the consent notice will be superseded by the proposed urban development and the consent notice will be cancelled outside of the FTAA. For completeness, it is noted that no dwellings or on-site wastewater systems are proposed within this existing lot.
5210644.2 Bond	This interest will not restrict or preclude development or subdivision activities from occurring within the site.
Easement Certificate 5210644.4	The easement will be superseded by the proposed development.
10253522.1 Compensation Certificate	This interest will not restrict or preclude development or subdivision activities from occurring within the site.
Easement Instrument 10718827.2	The easements will be superseded by the proposed development.
135 Greenhill Road – 18434	
5210644.1 Consent Notice	The consent notice relates to the detailed design of residential foundations and the on-site wastewater treatment and disposal system within the lot. The requirements of the consent notice will be superseded by the proposed urban development and the consent notice will be cancelled outside of the FTAA. For completeness, it is noted that no dwellings or on-site wastewater systems are proposed within this existing lot.
5210644.2 Bond	This interest will not restrict or preclude development or subdivision activities from occurring within the site.
Easement Certificate 5210644.4	The easement will be superseded by the proposed development.
Transfer 5210644.5	This interest relates to an easement which will be superseded by the proposed development.
Easement Instrument 10718827.2	The easements will be superseded by the proposed development.

1.4 Planning Context

The site is zoned General Rural Zone under the Waikato Proposed District Plan – Operative in Part (WDP-OP). A State Highway Noise Control Boundary applies over the western side of the site adjacent to the

Waikato Expressway. This control manages sensitive land uses within proximity to the corridor of the Waikato Expressway.

A New Zealand Transport Agency (NZTA) designation (Designation J17 under the WODP and NZTA-8 under the WDP-OP) is located adjacent to the southern and western boundaries of the site, and does not affect the site itself. No other planning controls or overlays are located over the site under the WDP-OP and Waikato Regional Plan and Waikato Regional Policy Statement (RPS).

The zoning pattern of the site and surrounding environment is illustrated in **Figure 4**. As illustrated, the immediately adjacent land is also zoned General Rural under the WDP-OP.

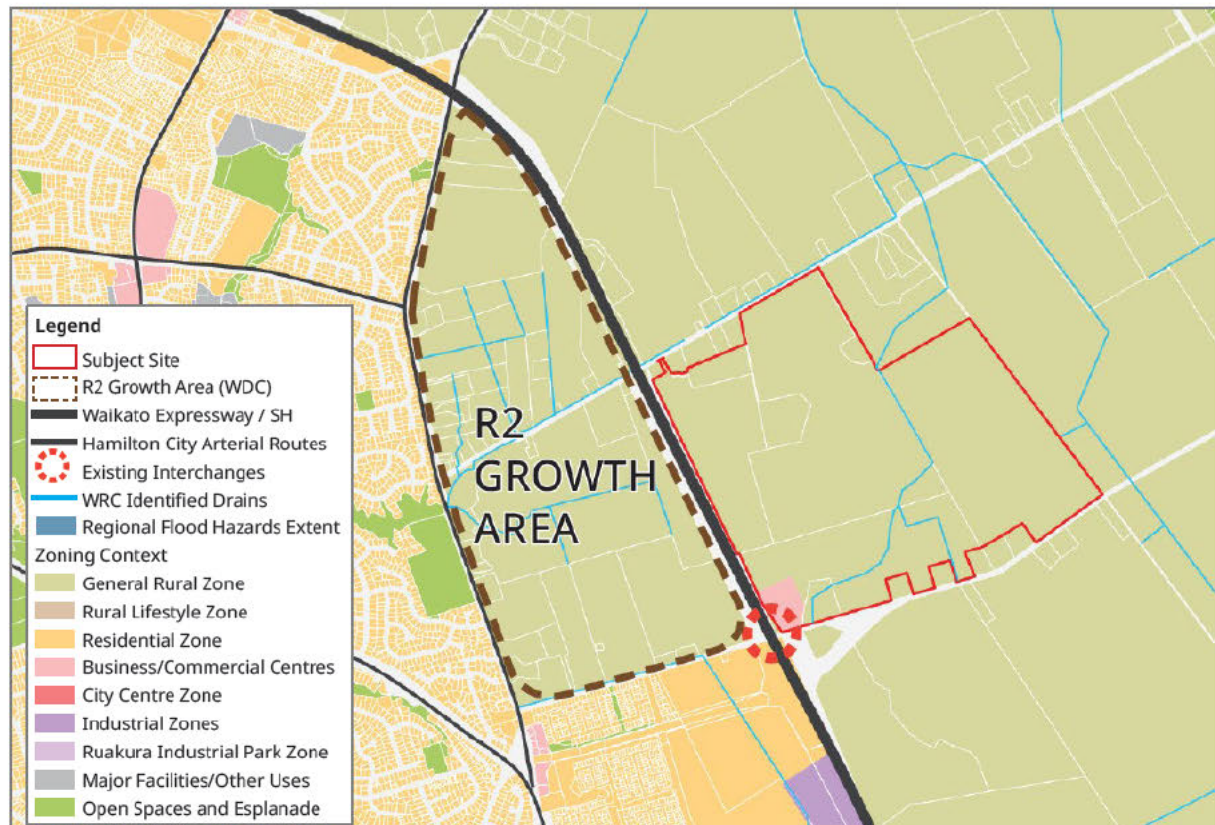


Figure 4: Zoning context.

As previously identified, the site is located to adjacent to the west of the R2 growth cell. The land within R2 growth cell has identified as being necessary to accommodate the growth of Hamilton City. The R2 growth cell area is subject to a strategic boundary agreement between Waikato District Council (WDC) and Hamilton City Council (HCC) as an area of land that is intended to become part of the HCC territory.

Of particular relevance to the surrounding environment and planning context, R2 growth cell comprises approximately over 200 hectares of land. A significant portion of land within R2, approximately 132 hectares, is a listed project under Schedule 2 of the FTAA as the 'Ruakura 2 (R2) Growth Cell'. The listed project is to subdivide and develop 132 hectares for residential allotments and 35 hectares for industrial use and a neighbourhood retail centre. As can be seen in **Figure 4**, the land adjacent to the south and west of the R2 growth cell is residentially zoned.

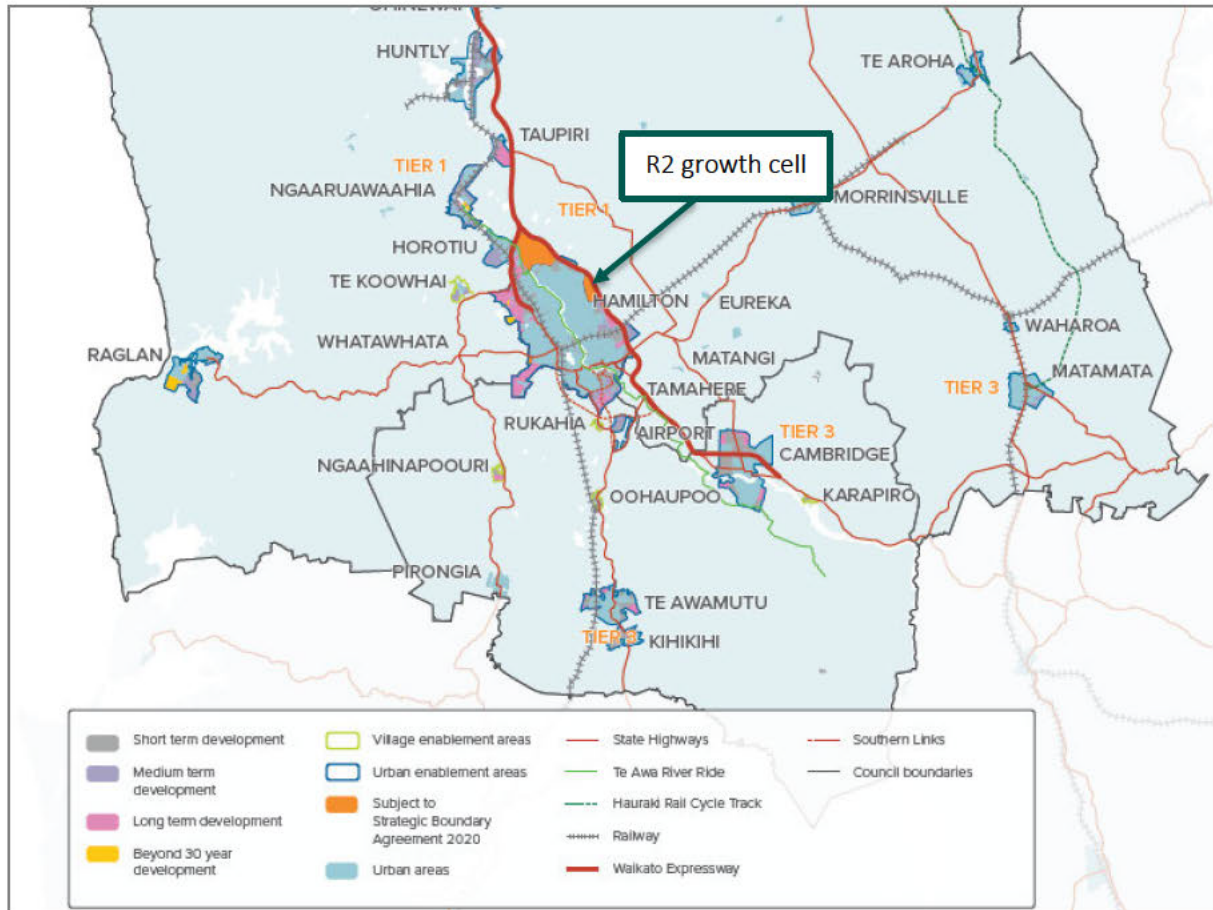


Figure 5: Approximate location of the R2 growth cell area identified in orange and adjacent to the Waikato Expressway identified in red (source: Future Proof Strategy).

1.5 Regional Significance of the Project

The Fast-track Approvals Act 2024 has established a framework that differs from the RMA. We acknowledge that the matters outlined in Sections 22(1)(a) and 22(2)(a) of the Fast Track Approvals Act direct the considerations available to the Minister when assessing a project's eligibility for referral.

In summary, the Greenhill Industrial Park project will advance a strategically located industrial park that delivers significant regional benefits. The project will provide an increase in industrial land supply that will contribute to addressing forecast shortfalls and tenure constraints in the Hamilton City market. The project will also deliver economic benefits through GDP and employment uplift during construction and long-term operation phases. There are also transport efficiencies due to its close proximity to the Waikato Expressway. Finally, the project will support a well-functioning urban environment by providing a range of industrial lot sizes with strong accessibility to existing residential areas, services, and infrastructure.

We respond to the relevant Section 22(2)(a) considerations for Greenhill Industrial Park below.

Section 22(2)(a)(i) – has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list:

Greenhill Industrial Park is not explicitly listed as a priority in a central government, local government, or sector plan or strategy, however it aligns with the FTAA (2024) purpose of accelerating projects that deliver significant regional benefits, as set out below.

Section 22(2)(a)(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):

The Greenhill Industrial Park will contribute to a well-functioning urban environment in the following ways:

- In accordance with Policy 1(b), Greenhill Industrial Park will provide for a variety of site sizes for industrial activities, ranging from 2,500m² to over 1 hectare to suit different business sectors. The masterplan has also been carefully considered to ensure that the proposed layout will provide for the functional requirements of industrial activities, including provision for vehicle manoeuvring for semi-trailers and rigid trucks;
- In accordance with Policy 1(c), Greenhill Industrial Park has good accessibility to existing homes and infrastructure. The project will provide employment opportunities in close proximity to existing residential development in Hamilton City; and
- In accordance with Policy 1(d), the supply of approximately 195 hectares of industrial land will increase supply and support the competitive operation of land and development markets. The impact of the project on Industrial Supply within the Waikato Region is further detailed below with respect to section 22(2)(a)(iv) of the FTAA.

Section 22(2)(a)(iv) – will deliver significant economic benefits:

The Economic Assessment included at **Attachment 3** identifies the economic benefits that will be delivered by Greenhill Industrial Park. In summary, the key economic benefits include:

- A one-time boost in GDP of around **\$830 million**;
- The generation of up to 5,420 FT-years over a ten-year development period, or full-time employment for 542 people for ten years. The employment opportunities will include:
 - **Future planning, design and consenting:** providing full time work for 10 people, generating approximately **\$10 million** in wages and salaries;
 - **Land development:** providing full time work for 90 people, generating approximately **\$84 million** in wages and salaries;
 - **Non-residential construction:** providing full time work for 438 people, with approximately **\$382 million** in wages and salaries; and
 - **Residential construction:** providing full time work for 5 people, with approximately **\$4 million** in wages and salaries.
- At full build-out, Greenhill Industrial Park is estimated to support full time work for 3,555 people, sustaining annual GDP of **\$471 million** and **\$265 million** paid annually in wages and salaries.

- Greenhill Industrial Park will significantly increase industrial supply within the Waikato Region and in particular, will contribute to addressing projected shortfalls in industrial land within Hamilton City. While the site lies within the Waikato District, its immediate proximity to Hamilton City and adjacency to the R2 growth cell means that it can effectively contribute to Hamilton's industrial land market. In accordance with the Business Development Capacity Assessment prepared for Future Proof Partners, Hamilton City's surplus industrial land supply over the short, medium, and long term is unevenly distributed and approximately 94% of all available land is concentrated within Ruakura and Te Rapa. Other areas exhibit shortages in industrial land at every time horizon or only have marginal sufficiency in the short term.

Additionally, while there is shown to be a city-wide sufficiency within Hamilton City, more than half of the identified available industrial land supply is within Ruakura, where land supply is controlled by Tanui Group Holdings and offered on a leasehold basis. This is a potential constraint on the availability of long-term supply as it may not meet the needs of businesses that prefer or require freehold tenure.

- The location of the project provides an opportunity for businesses to co-locate near, and achieve synergies with activities in the adjacent R2 growth cell's industrial development as well as the wider Ruakura Superhub and inland port. This proximity will create 'agglomeration benefits', where efficiencies can be gained through shared services, supply-chains, and access to a larger customer and labour pool. These benefits are particularly relevant for industrial activities.
- Enabling the highest and best use of the land resource given its strategic location adjacent to the Waikato Expressway and associated interchanges/on- and off-ramps in this location, which provides direct access to New Zealand's primary north-south transport corridor. This location enables efficient freight movement and distribution across the upper and central North Island, including between Hamilton, Auckland, and Tauranga.
- Overall, and from an economic perspective, industrial development in this location will:
 - Support the efficient operation of regional supply chains by reducing freight travel distances and times;
 - Maximise the value of infrastructure investments and in particular the Waikato Expressway;
 - Strengthen Hamilton's role as a regional logistics and manufacturing hub; and
 - Avoid inefficient land use patterns and fragmentation that arise when industrial activities are displaced to less accessible or less serviced areas.

Section 22(2)(a)(vii) – will support climate change mitigation, including the reduction or removal of greenhouse gas emissions:

Greenhill Industrial Park seeks to minimise greenhouse gas emissions where possible through construction and within the masterplan design:

During construction, greenhouse gas emissions will be reduced through the following measures:

- Minimising the number of truck movements required to manage earthworks material by retaining as much as possible within the site; and
- A staged construction approach that allows for the appropriate management of effects on the environment.

Following construction, the ongoing reduction of greenhouse gas emissions will be supported by:

- Very close proximity to regional transport infrastructure which will provide direct access between the site and the Hamilton and Auckland regions; and
- Provision for employment opportunities in close proximity to residential development in Hamilton City.

Section 22(2)(a)(x) – is consistent with local or regional planning documents, including spatial strategies:

Overall, Greenhill Industrial is consistent with the relevant local and regional planning documents, as set out below.

Future Proof Strategy

Future Proof Strategy 2024 – 2054 (**Future Proof Strategy**) is a 30-year growth management and implementation plan for the Hamilton, Waipā, Waikato, and Matamata-Piako sub-region. It provides a framework to manage growth in a staged and coordinated manner, addressing complex planning issues, especially cross-boundary matters. The strategy seeks to ensure that housing, employment, and transport networks are well-aligned. It also provides a framework for responding to population growth, climate change, and economic challenges while supporting vibrant, liveable communities.

The key relevant objectives and principles of Future Proof Strategy are:

- Ensure an adequate and timely supply of industrial land to meet long-term economic needs;
- Ensure industrial activities are located in areas where land can be used effectively, minimising fragmentation and avoiding premature urbanisation of rural land;
- Ensure business land release is co-ordinated with infrastructure provision in long term plans;
- Strengthen connections between business services and industries within the metro economic corridor to support the efficient movement of people, goods and services to and through the area;
- Development is planned in a way that minimises land use conflicts, including minimizing potential for reverse sensitivity issues.

Greenhill Industrial Park generally demonstrates strong alignment with these key objectives and principles as follows:

- As outlined above, Greenhill Industrial Park will increase the supply of industrial land to meet projected shortfalls in the industrial land market in Hamilton City;
- The location of the site will ensure that the land can be used efficiently for industrial activity while minimising ad-hoc fragmentation. The site will provide for an extension to planned industrial activities as it is located adjacent to the R2 growth cell that anticipated to be developed for light industrial and residential activities;
- As further detailed in the Infrastructure Technical Memorandum included at **Attachment 4**, Greenhill Industrial Park can be serviced with three waters infrastructure through a range of on-site and reticulated options, or a combination of both. As detailed in the Transportation Memorandum, it is anticipated that the required transport infrastructure upgrades will be limited to localised transport upgrades, and in particular at the surrounding intersections external to the site;

- The site is well-connected to the Waikato Expressway and State Highway network between the Auckland and Waikato regions, and will directly enable the efficient movement of people, goods, and services through the use of existing regional transport infrastructure;
- The conceptual masterplan has been designed to minimise land use conflicts between new industrial activities and existing rural-residential lots, including by incorporating new rural-residential lots in locations adjacent to those existing properties and providing opportunities to establish landscape buffers at the site boundaries.

Te Ture Whaimana o Te Awa o Waikato (Vision and Strategy)

The Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 gives effect to the Deed of Settlement signed by the Crown and Waikato-Tainui on 17 December 2009. The Settlement Act has an overarching purpose to restore and protect the health and wellbeing of the Waikato River for future generations. Section 9(2) of the Settlement Act confirms that the vision and strategy for Waikato River (Te Ture Whaimana o Te Awa o Waikato) applies to the Waikato River and activities within its catchment affecting the Waikato River.

As identified in the Infrastructure Technical Memorandum prepared by Maven, the stormwater strategy for the site will incorporate the following key principles to manage stormwater quantity and quality:

- Inert roofing material for all new buildings;
- Use of permeable paving where suitable to reduce impervious areas;
- Inclusion of detention basins, wetlands, and propriety devices such as raingardens, treepits, and stormwater filters to achieve treatment;
- Treatment of public roads and right of ways; and
- Inclusion of treatment train devices to provide stormwater and attenuation.

In addition, all earthworks will be undertaken in accordance with best practice erosion and sediment control measures to protect the health and wellbeing of the Waikato River.

The proposed stormwater strategy for the site will be refined through detailed design, and will be discussed as part of ongoing engagement with Ngāti Haura, Ngāti Warere, and Waikato Tainui to ensure that Greenhill Industrial Park supports the restoration and protection of the health and wellbeing of the Waikato River.

Iwi Planning Documents

Engagement correspondence was sent to hapū with resource management interest in the Greenhill Industrial Park site, and Ngāti Haura, Ngāti Warere, and Waikato Tainui have confirmed their interest in being involved in this project on an on-going basis.

Of these hapū, Waikato Tainui has an environmental plan, the Waikato-Tainui Environmental Plan. This planning document is assessed below.

Waikato-Tainui Environmental Plan

The Waikato-Tainui Environmental Plan (**WTEP**) provides a background to, and identifies key, resource-based issues for Waikato-Tainui. The plan sets out Waikato-Tainui's vision statement for environmental and heritage issues and key strategic objectives such as tribal identity and integrity, including "to grow our tribal estate and manage our natural resources." The plan is designed to enhance Waikato-Tainui participation in resource and environmental management.

Section 25 of the WTEP refers to land use planning and development activities and includes objectives and policies which accept that development activities will occur on the basis of achieving positive environmental outcomes and overall environmental enhancement initiatives. In this respect, the WTEP is considered to enable this type of development provided that the potential environmental effects are appropriately managed and the overall environmental management objectives of these documents are achieved.

Section 19.4 of the WTEP outlines water quality objectives to ensure that fresh waters within the rohe of Waikato-Tainui are drinkable, swimmable and fishable in all places. Based upon the methods proposed to address the potential water quality effects of the proposed activities, it is considered that these objectives of the WTEP will be achieved for the proposed development and water quality values of the Waikato River receiving environment will not be compromised.

Regular hui with representatives of Waikato Tainui have been held regarding Greenhill Industrial Park, and engagement will be ongoing through detailed design and the substantive application and it is considered that Greenhill Industrial Park will not be inconsistent with the objectives of WTEP.

Waikato 2070 – Growth & Economic Development Strategy

The Waikato 2070 Growth & Economic Development Strategy (**Waikato 2070**), outlines a 50-year vision for sustainable and strategic growth across the Waikato district. The strategy provides a framework for balancing economic development, community wellbeing, and environmental stewardship to create liveable, thriving, and connected communities. The project is strongly aligned with the focus areas identified under Waikato 2070. It reflects the strategy's core vision of creating liveable, thriving, and connected communities and contributes to all four focus areas outlined in the strategy.

The project is consistent with the relevant focus areas and opportunities identified under Waikato 2070, as identified below.

Growing our Communities:

- Compact growth pattern: The project will enable urban growth close to the territorial boundaries of Waikato District and Hamilton City, and close to land that has been earmarked for industrial development. As Greenhill Industrial Park will also address existing shortfalls in industrial land supply and contribute to meeting demand, the project is considered to represent a compact growth pattern and logical extension in this location;
- Infrastructure: As outlined below, Greenhill Industrial Park will be supported by efficient transport and three waters infrastructure to ensure that new industrial activities can be serviced without creating adverse effects on the surrounding environment.

Build our Businesses:

- Economic uplift: As identified above, the project will deliver on-off and ongoing economic benefits, including employment opportunities during and following the construction phase and 'agglomeration benefits' for future industrial activities.
- Strategically located industrial clusters: As outlined above, the project, together with the R2 growth cell, will enable a strategically located industrial cluster that located in proximity to existing transport infrastructure

Embrace our Identity:

- Cultural integration: Ngāti Hauā, Ngaati Wairere, and Waikato Tainui have been engaged through the preparation of the Greenhill Industrial Park masterplan and referral application, and engagement will be ongoing as design details are confirmed through the substantive application. The masterplan in particular includes opportunities to represent cultural values, and in particular through planting, artwork, and story boarding within the proposed natural spaces.
- Landscape and environmental design: Ecological enhancement, including selective native species will uphold the identity and natural character of the rural Waikato landscape. Through the opportunities to incorporate new planting, the project will promote ecological and environmental protection and restoration.

Overall, Greenhill Industrial Park is a well-considered and strategically located development that is consistent with the focus areas of Waikato 2070. It will contribute to industrial land supply and meeting forecasted shortfall, protect natural and cultural resources, and support economic development. This alignment demonstrates the project's strategic merit and consistency with Waikato 2070.

Waikato Regional Policy Statement

The Waikato Regional Policy Statement: Te Tauākī Kaupapahere Te-Rohe O Waikato (**Waikato RPS**) became operative in May 2016. The Waikato RPS provides an overview of the resource management issues in the Waikato region, and the ways in which integrated management of the region's natural and physical resources will be achieved.

Greenhill Industrial Park is consistent and well-aligned with the following objectives of particular relevance:

- IM-O7 recognises the relationship of tangata whenua with the environment. The project supports this by:
 - Engaging with iwi and hapū with resource management interests in the site to incorporate cultural values throughout the development.
- UFD-O1 seeks that the development of the built environment occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural, and economic outcomes. The project achieves this by:
 - As outlined above, Greenhill Industrial Park will support a cluster or node of industrial activity located in close proximity to existing regional scale infrastructure. The project can also be serviced by infrastructure as development is progressed in stages over time. This will contribute to an integrated and sustainable built environment that will also enable social and economic benefits.
 - As further assessed in Section 5.0 below, potential environmental effects can be appropriately managed and avoided and/or mitigated.
- ECO-O1 requires a full range of ecosystem types, their extent and the indigenous biodiversity that they support to exist in a healthy and functional state. The project supports this by:
 - As outline in the Ecological Memorandum, the project includes potential positive effects, including riparian restoration and landscape planting that will contribute to supporting the health and function of existing ecosystems.
- LF-O1 seeks to maintain or enhance the mauri and identified values of freshwater bodies. The project will achieve this by:

- Providing ecological enhancement in riparian areas through new planting located within the greenway; and
- Ensuring potential effects on freshwater values can be appropriately managed, including through the effects management hierarchy.
- LF-O5 and LF-O6 seek to safeguard the life supporting capacity of soil resources for existing and foreseeable uses and to recognise and protect the value of high class soils from inappropriate subdivision, use or development.
 - The site contains LUC class 2 soils classified as high class soils under the Waikato RPS, and the proposal will result in the loss of this land for future primary production activities. However, as set out in Sections 4.0 and 5.0 below, high class soils within the site are subject to a number of constraints that create limitations on land use.

Overall, it is considered that Greenhill Industrial Park demonstrates broad alignment with the Waikato RPS. The in consistency with LF-O5 and LF-O6 are considered to be acceptable on balance with consideration to the suit of RPS provisions that the proposal will give effect to, existing land use limitations on existing high class soils, and the significant regional benefits that will be delivered.

1.6 Benefit of the Fast-Track Approvals Act (2024)

As outlined in Section 22(1)(b)(i) and (ii), part of the determination for accepting a referral application includes outlining whether the FTAA (2024) process would facilitate a more efficient and timely delivery of the project;

(b) referring the project to the fast-track approvals process—

- i. would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and*
- ii. is unlikely to materially affect the efficient operation of the fast-track approvals process.*

As outlined in Section 3.0 below, Greenhill Industrial Park requires a range of resource consents (land use, subdivision, discharge) from Waikato District and Waikato Regional Council's, and a specific approval under the Wildlife Act 1953 for an Authority. The ability to apply for a comprehensive range of consenting requirements within one application, to be considered by one panel, offers significant efficiencies in planning and specialist inputs into managing and navigating the consenting process. The overall intent of the FTAA (2024), which is designed for regionally and nationally significant infrastructure and development projects, supports the scale and significance of Greenhill Industrial Park. The consolidated timeframes for engagement with interested stakeholders and parties, wider consultation requirements to support substantive applications, and the overall detail required support a more timely and efficient consideration of the project.

Outside of the FTAA (2024) process, it would be anticipated that Greenhill Industrial Park would not be able to obtain resource consent for subdivision as a Prohibited Activity, and other aspects would be subject to a challenging and complex consenting requirement that would test the current District Plan provisions. Our understanding of the FTAA legislation is to support regionally and nationally significant projects with a single consenting process. This would enable development commencing sooner and the economic, social and wider positive benefits to be realised sooner. The FTAA process is considered the right instrument for this scale of project, and the Orchard Grove project is not considered to materially impact on the intent or

efficient operation of the FTAA process, more so it would reinforce the value and opportunity that the FTAA (2024) presents for regionally and nationally significant projects.

2.0 Experience

B&A have provided planning expertise on a wide range of developments, under the Resource Management Act 1991, COVID-19 Recovery (Fast-track Consenting) Act 2020, and the recent Fast Track Approvals Act. This includes, but is not limited to: providing planning advice; referral applications; obtaining resource consents under District Plans, Regional Plans, and National Environmental Standards; consultation; and expert witness conferencing.

2.1 Rotokauri Greenway & Minor Arterial Fast-Track Consent

B&A were responsible for the planning inputs for the 'Rotokauri Greenway & Minor Arterial Transport Corridor' resource consent application. On behalf of Hamilton City Council and Hounsell Holdings Limited, B&A obtained a comprehensive suite of resource consents for the construction of the Rotokauri Greenway and Minor Arterial transport corridor, under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Located in Rotokauri, Hamilton, this development involved the construction of a 4.7-kilometre length greenway corridor between two lakes to effectively manage and attenuate stormwater within the catchment, construction of artificial wetlands for stormwater treatment, construction of a 1.3-kilometre Minor Arterial transport corridor, and supporting infrastructure.

This primarily infrastructure project was complex, particularly as it involved works within designation and notice of requirement areas, with several ecological matters (such as black mudfish and natural wetlands) that required offsetting and compensation.

B&A led and supported with the following:

- Coordination of specialist documentation;
- Consultation with stakeholders, including territorial authorities, iwi, and adjoining landowners;
- Preparation and filing of the referral application;
- Preparation and lodgement of the resource consent application;
- Participation in expert witness conferencing; Obtaining Section 176 Approval; and
- Review of draft conditions.

Resource consent was granted by the panel, subject to conditions of consent, on 17 July 2024.

2.2 Current Projects under Fast-Track Approvals Act

B&A continues to be actively involved in fast-track projects. We are currently engaged across a number of listed projects, several recently referred projects, and others that we are preparing for referral in collaboration with MfE and the EPA. Our team is well-versed and highly experienced in navigating the Fast-Track Approvals process to date.

3.0 Reasons for Consent

3.1 Waikato District Plan

Resource consent may be required under the following modules and chapters of the WDP-OP and WODP:

- Subdivision of high class soil (Prohibited Activity);
- Subdivision – fee simple lots in General Rural Zone (Non-Complying);
- Earthworks (Restricted Discretionary Activity);
- Three waters infrastructure and servicing (Restricted Discretionary Activity);
- New public roads (Restricted Discretionary Activity);
- Buildings which do not comply with the building bulk and location controls of the General Rural Zone under the WDP-OP, including height in relation to boundary, building coverage, and setback (Restricted Discretionary Activity);
- Provision for the potential following activities (Non-Complying Activity):
 - Industrial activity
 - Light industrial activity
 - Ancillary retail activity
 - Trade and industry training facilities
 - Truck stop for refuelling
 - Food and beverage outlets less than 200m² gross floor area
 - Wholesale retail and trade supplies
 - Building improvement centres
 - Offices ancillary to an industrial activity which do not exceed 100m² gross floor area or 30% gross floor area of all buildings within a site
 - Ancillary retail which does not exceed 10% gross floor area of all buildings within a site
 - Hire Centre
 - Wholesale
 - Trade supply outlet
 - Transport depot
 - Garden centre
 - Service station
 - Retailing of agricultural and industrial motor vehicles and machinery
 - 1x caretakers' or security person's residential unit per site located within an industrial building and not exceeding 70m² gross floor area
 - Yard based activity

- Landscape and supply

Detailed design work will confirm the specific rules which apply to the proposed development. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

Overall, the proposal requires resource consent as a **Prohibited Activity** under the WODP and WDP-OP and the following resource consents:

- Section 9 land use consent; and
- Section 11 subdivision consent.

3.2 Waikato Regional Plan

- 3 Water Module
 - 3.3 Water Takes
 - 3.4 Efficient Use of Water
 - 3.5 Discharges
 - 3.6 Damming and Diverting
 - 3.7 Wetlands
 - 3.8 Drilling
- 4 River and Lake Bed Module
 - 4.1 River and Lake Bed Management
 - 4.3 River and Lake Bed Disturbances
- 5 Land and Soil Module
 - 5.3 Contaminated Land

Detailed design work will confirm the specific rules which apply to the proposed development and the activity status with respect to the above modules and chapters. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

Overall, the resource consents required under the Waikato Regional Plan include:

- Section 9 and section 13 land use consents;
- Section 14 water permit; and
- Section 15 discharge permit.

3.3 National Environmental Standards

3.3.1 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011

Detailed site investigations will confirm the specific resource consents required under regulations 9 – 11 of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human

Health 2011 (**NESCS**). The effects of any proposal for earthworks and subdivision will be assessed as part of a substantive application if successfully referred.

3.3.2 National Environmental Standards for Freshwater 2020

Detailed design work will confirm if work around wetlands require resource consent in accordance with Subpart 1 of the National Environmental Standards for Freshwater 2020 (**NESFW**), including Regulations 52, 53 and 54 as well as the overall activity status. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

3.3.3 Other Approvals

Wildlife Act 1953

Based on the Ecological Memorandum (**Attachment 5**), it is anticipated that a Wildlife Act (1953) Authority (**WAA**) would be sought from the Department of Conservation (**DOC**) for the management of indigenous lizards during vegetation clearance. It is anticipated that salvage and relocation measures will be identified as part of this process. Further specialist reporting will determine if any other approvals will be sought under a WAA. The details of the WAA approval are to be progressed with DOC as part of pre-lodgement consultation of the substantive application and would be outlined in detail as part of ecological Management Plans, or other type of plan as required, for a substantive application. Should any other WAA be required as part of further specialist reporting, this will be worked through in consultation with DOC.

Heritage New Zealand Pouhere Taonga Act 2014

Based on the Archaeology Assessment (**Attachment 6**), we anticipate that an Archaeological Authority would be sought from Heritage New Zealand Pouhere Taonga (**HNZPT**) in relation to recorded archaeology site S14/508 associated with a field drain that has the potential to provide evidence of the early European Settlement of Hamilton and the Waikato. The details of the Archaeological Authority, as well as further engagement and consultation with iwi and hapū in accordance with the requirements of the Act will be progressed as part of the substantive application.

4.0 Statutory Planning Framework

This section is provided in accordance with subclause 2(1)(a)(i) – (iii) of Schedule 5. This requires that applications include an assessment of the activity against the relevant provisions and requirements of the following statutory documents:

- (a) any relevant national policy statements; and
- (b) any relevant national environmental standards; and
- (c) if relevant, the New Zealand Coastal Policy Statement.

4.1 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 (**NPS-FM**) seeks to manage natural and physical resources to prioritise firstly, the health and wellbeing of water bodies and freshwater ecosystems, secondly, the health and needs of people, and thirdly, the ability to provide for the social, economic, and cultural wellbeing of people and communities.

It is noted that the NPS-FM was amended in 2025 with respect to quarrying and mining activities. These amendments are not relevant to the proposal as no quarrying or mining activities are proposed.

It is considered that the project is consistent with the relevant policies of the NPS-FM that relate to land development for the following reasons:

- The development of Greenhill Industrial Park provides opportunity for ecological restoration of an area that has particularly low ecological value.
- The project specifically includes riparian restoration along the existing watercourse, involving stream realignment, naturalisation, and native planting to improve ecological health and connectivity.
- The project seeks to improve the health and well-being of the Waikato River by treating stormwater prior to discharge through a number of best-practice stormwater management devices.
- Iwi and hapū have been involved and consulted to this point of the project, which will continue to occur. The project will incorporate cultural values in its design, using cultural expertise to integrate their values and cultural heritage where possible.
- There are significant opportunities for restoration and enhancement across the site, including through the maintenance and enhancement of habitat and vegetation cover where possible.
- Any unavoidable loss of natural inland wetlands will be addressed through onsite offsetting.
- Wetland creation is proposed (up to 6ha), integrated with stormwater basins and watercourse restoration, delivering ecological net gain and contributing to a well-functioning wetland ecosystem.
- Wastewater is proposed to connect to the network if possible; if not, onsite treatment will ensure discharge quality aligns with receiving environments, avoiding adverse effects on water quality.
- Erosion and sediment control measures will follow Waikato Regional Council guidelines to minimise impacts on freshwater quality and aquatic life.
- Ongoing monitoring will take place to ensure the condition of water bodies and freshwater ecosystems is not degraded.

Based on the above assessment, it is considered that the project is consistent with the NPS-FM.

4.2 National Policy Statement for Highly Productive Land

The National Policy Statement for Highly Productive Land 2022 (**NPS-HPL**) ensures the availability of New Zealand's most favourable soils for food and fibre production, now and for future generations. The NPS-HPL came into effect on 17 October 2022, and was amended in December 2025 to introduce interim exemptions for urban development and urban rezoning on Land Use Capability (**LUC**) Class 3 land under clauses 3.5 and 3.6. The amendments do not include any changes to the objective and policies of the NPS-HPL.

The Land Use Capability Classification Assessment (LUC Assessment) supporting this application and included at **Attachment 7** identifies the site to include a mix of class 2, 3, and 4 soils. Despite the class 2 and 3 classifications for some of the site, the LUC Assessment identifies limitations for land-based primary production, including as a result poor drainage, erosion susceptibility due to the slope of land, and fragmentation of class 2 soils due to the presence of a contiguous area of class 4 land which bisects the site.

Of relevance to Greenhill Industrial Park, the NPS-HPL provides for urban development on highly productive land where:

- Urban rezoning or development is needed to provide sufficient development capacity to give effect to the NPS-UD.
- No other reasonably practicable or feasible options exist to provide the required capacity in the same locality and market while achieving a well-functioning urban environment.
- The environmental, social, cultural, and economic benefits of development outweigh the associated costs of losing the HPL.

The NPS-HPL also provides an exemption pathway allowing highly productive land to be subdivided, used or developed for activities not otherwise enabled through the NPS where there are permanent or long term constraints that mean the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years.

Greenhill Industrial Park satisfies the relevant policy tests:

- There are permanent constraints on the land that limit the use of the land for land-based primary production activities;
- Due to existing constraints of the land, the proposal will avoid significant loss of productive capacity of highly productive land in the district;
- Greenhill Industrial Park is located adjacent to the identified R2 Growth Area, separated only by the State Highway network. The close proximity of the site to an area that has been identified for urban growth will avoid fragmenting existing geographically cohesive areas of highly productive land;
- The proposed industrial park will enable activities that are less sensitive to the potential effects of surrounding rural production activities and the proposed rural-residential lots have been designed to be compatible with existing residential activities similar in scale. Landscape planting will also propose to address any potential effects at the interface of residential and industrial activities with primary production activities as required. It is considered that these factors will cumulatively contribute to avoiding and mitigating any potential reverse sensitivity effects; and
- Having regard to the above considerations and the matters set out in section 1.5 above, it is considered that the environmental, social and economic benefits of the proposed subdivision, use and development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land. In particular, Greenhill Industrial Park will make a significant contribution to increasing industrial supply within the Waikato Region to address projected shortfalls. Greenhill Industrial Park is particularly

Based on the above assessment, it is considered that the project is not inconsistent with the NPS-HPL.

4.3 National Policy Statement for Indigenous Biodiversity

The National Policy Statement for Indigenous Biodiversity (**NPS-IB**) ensures that protection, maintenance and restoration of New Zealand's most threatened indigenous species. The NPS-IB came into effect on 4 August 2023.

It is noted that the NPS-IB was amended in 2025 with respect to quarrying and mining activities. These amendments are not relevant to the proposal as no quarrying or mining activities are proposed.

It is considered that the project is consistent with the relevant objectives and policies of the NPS-IB for the following reasons:

- The proposal commits to avoiding adverse effects where practicable, mitigating through sensitive design and management, and offsetting/compensating where residual adverse effects remain.
- The project seeks to enhance biodiversity across the site through indigenous vegetation planting.
- The existing environment is highly modified pastoral land with very limited indigenous vegetation and fauna habitat. There are no identified Significant Natural Areas, significant amenity landscapes or notable trees within or immediately adjoining the site.
- The project adopts the effects-management hierarchy, seeking to avoid adverse effects on indigenous biodiversity where practicable, then minimise and remedy them through sensitive masterplanning, and provide biodiversity offsetting/compensation where there are residual effects.
- Two small, potential natural inland wetlands (approximately 0.5ha in total) have been identified. These wetlands are subject to further investigation through the substantive process. These wetlands are proposed to be offset through the creation and restoration of new wetland habitat within an identified approximately 6 hectare area integrated with the proposed re-aligned watercourse (to the natural alignment) and stormwater basins, providing a clear net ecological gain relative to the current conditions.
- The masterplan includes a central blue-green corridor based on the realignment and naturalisation of the watercourse, including the riparian buffers, in-stream habitat enhancement and stormwater treatment wetlands. This will increase indigenous vegetation cover, improve habitat quality and connectivity, and restore more natural hydrological and ecological functioning of the site's drainage network.
- Extensive indigenous planting is proposed through riparian vegetation, stormwater ponds, wetland creation areas, landscape buffers along the expressway and rural interfaces, and street tree and greenway planting, increasing the extent and resilience of indigenous vegetation and providing habitat for indigenous birds, bats, lizards and invertebrates over the medium to long term.
- Management plans will be prepared through a substantive application to address any potential adverse effects on birds, lizards and bats.
- Culverts will be designed to meet national fish passage guidelines, and fish management plans (capture/relocation) will address potential adverse effects during drain or stream works.

Based on the above assessment, it is considered that the project is consistent with the NPS-IB.

4.4 National Policy Statement on Urban Development

The National Policy Statement on Urban Development 2020 (**NPS-UD**) ensures New Zealand's towns and cities are well functioning urban environments that meet the changing needs of our diverse communities. It removes overly restrictive barriers to development to allow growth 'up' and 'out' in locations that have good access to existing services, public transport networks and infrastructure. It is noted that this legislation was amended in accordance with section 77S(1) of the RMA and notified on 11 May 2022.

The NPS-UD enables the development of land and infrastructure for urban land uses while recognising the national significance of well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing (Objective 1 and Policy 1).

It is considered that the project is consistent with the relevant objectives and policies of the NPS-UD and will contribute to a well-functioning urban environment for the following reasons:

- The proposal will deliver a high-quality industrial park that supports economic wellbeing and employment opportunities, while integrating landscaping, stormwater management, and cultural design elements.
- The development will provide a range of lot sizes and flexible layouts to accommodate diverse industrial activities, enabling efficient land use and supporting economic productivity within the Waikato region.
- The site is strategically located adjacent to the Waikato Expressway (State Highway 1), offering direct access to New Zealand's primary north-south transport corridor. This ensures efficient freight movement, reduced travel times, and enhanced accessibility and connectivity to Hamilton, Auckland and Tauranga.
- The Housing and Business Capacity Assessment identifies industrial capacity shortfalls in Hamilton and the Waikato sub-region. Greenhill Industrial Park will directly assist and respond to this shortfall by increasing business land supply through delivering 167 industrial lots of varying sizes, supporting regional employment and supply chain resilience.
- The development is positioned near the Waikato R2 Growth Area and Ruakura Industrial Park, creating a cohesive transition from rural to urban industrial land uses and complementing Hamilton's planned growth strategy.
- The staged development approach aligns with infrastructure delivery, including stormwater management, wastewater systems, and transport upgrades, ensuring timely and cost-effective servicing.
- The Greenhill Industrial Park will attract manufacturing, logistics and distribution businesses, creating jobs and strengthening Hamilton's role as a regional economic centre.
- Infrastructure provision is aligned with staging and coordinated ensuring integrated and responsiveness to demand.
- The masterplan anticipates future industrial needs through adaptable lot configurations and staged development, allowing the area to evolve in response to market and community demands.

Based on the assessment above, it is considered that the project is consistent with the NPS-UD.

4.5 National Policy Statement for Natural Hazards 2025

The National Policy Statement for Natural Hazards 2025 (**NPS-NH**) applies to flooding, landslip, coastal erosion, coastal inundation, active faults, liquefaction, and tsunami natural hazards. The objective and policies of the NPS-NH seek to manage natural hazard risk associated with subdivision use and development to people and property using a risk-based proportionate approach, with the risk level being assessed using the NPS-NH risk matrix.

The risk associated with subdivision, use, and development assessed as having 'very high' natural hazard risk must be avoided, and increased significant natural hazard risk on other sites must be avoided or mitigated using an approach that is proportionate to the level of actual risk. Decision-makers are required to apply mitigation measures and use the best information available information, even when information is uncertain

or incomplete. The NPS-NH also requires the consideration of the potential impacts of climate change to at least 100 years into the future.

The proposal includes subdivision, use and development on land that is subject to flooding natural hazards and is considered to be consistent with the objective and policies of the NPS-NH for the following reasons:

- A preliminary flood assessment has been carried out by Maven, included in **Attachment 4**. The post-development model shows that the majority of new lots will be located outside of the 1 per cent floodplain. The preliminary assessment has also identified post-development design parameters for water surface levels and flow rates. The assessment confirms that subject to future development achieving these parameters, there will be no adverse downstream effects from the proposal. It is anticipated that additional investigation and detailed design will be undertaken as part of the substantive application to refine the design solution;
- A preliminary geotechnical assessment has been undertaken by HD Geo at **Attachment 8**, indicating that natural hazards on the site are likely to include liquefaction, static settlement, and slope instability. The report identifies the potential for 'high' liquefaction hazard within parts of the site and identifies that detailed design will need to include considered measures and other mitigation factors. The report also identifies that the risk of global or large-scale slope instability is 'unlikely', and that while settlement may be triggered by future buildings, mitigation measures can be implemented to reduce the potential impacts;
- The site is located outside of the Coastal Environment and is not considered to be susceptible to coastal erosion, coastal inundation, and tsunami natural hazards; and
- Based on these preliminary investigations, it is considered that Greenhill Industrial Park will enable 'very high' natural hazard risk to be avoided as part of future subdivision, use, and development. Other levels of risk can be managed proportionately through detailed design measures that will be refined as part of the substantive application.

Based on the assessment above, it is considered that the project is consistent with the NPS-NH.

4.6 National Policy Statement for Infrastructure 2025

The National Policy Statement for Infrastructure 2025 (**NPS-I**) provides national direction under the RMA to guide the efficient development, management, and upgrading of infrastructure across New Zealand. The NPS-I provides for infrastructure. While the Greenhill Industrial Park application is not for an infrastructure activity, it includes ancillary three waters infrastructure to service development, and it is anticipated that the proposal will not be inconsistent with the provisions of the NPS-I.

4.7 National Environmental Standards for Air Quality

The Resource Management (National Environmental Standards for Air Quality) Regulations 2004 (**NES-AQ**) sets standards to guarantee a minimum level of health protection for people living in New Zealand.

No specific consents relating to this standard are required for the Project, although the relevant regulations in the NES-AQ have informed the assessment of construction and operational air quality effects. The potential for effects on air quality in relation to the Project relate primarily to dust during the construction phase. Measures are proposed to manage potential effects in response to air quality objectives and policies.

The management of dust and odour will be addressed in the Construction Management Plan and Erosion and Sediment Control Plan. As such, ambient air quality will be maintained once Greenhill Industrial Park is constructed.

4.8 National Environmental Standards for Freshwater

The Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (**NES-F**) sets standards to regulate activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the project are provisions which manage works in and around streams and natural wetlands.

Two potential natural inland wetlands have been identified on the site which are subject to further investigation. Any required physical works that will be determined as part of detailed design may relate to vegetation clearance and earthworks within or around natural inland wetlands, drainage of natural inland wetlands, and loss of natural inland wetlands. The site also includes a modified watercourse.

The Ecology Memorandum prepared by EcoLogical Solutions identifies a range of mitigation measures that can be implemented to address any potential adverse effects on value and extent. Offsetting and compensation, if appropriate, can also be assessed as part of a further Ecological Assessment that would be included as part of a substantive application.

4.9 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health

The Resource Management (National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (**NES-CS**) sets a nationally consistent set of planning controls and soil contaminant values.

HDGeo have undertaken a Preliminary Site Investigations (**PSI**) for the site, included at **Attachment 9**. The key findings of the PSI are:

- The site has one primary land use, an operational dairy farm. The PSI has identified several activities that are considered to fall within the scope of the HAIL, either directly or through associated practices.
- It is likely that there is the potential for contamination associated with HAIL activities including:
 - Livestock dip or spray race operations – Stock races in the central-north and north-west portions of the site may have been used for pesticide treatment of livestock;
 - Landfill sites – across the site there are five areas of uncharacterised fill or potential waste disposal;
 - Degradation of lead-based paint – 29 buildings constructed pre-1960 likely used lead-based paint with a risk of lead contamination in surrounding soil; and
 - Degradation of asbestos containing material – 42 buildings across the site constructed pre-2000 may contain asbestos containing material.
- The site is in a high-risk zone for acid sulfate soils due to gley soils and Holocene swamp deposits. Disturbance during earthworks could generate acidic conditions and mobilise metals.

A detailed site investigation is recommended and will be progressed under the substantive application to determine the exact extent and locations of any contamination. The PSI confirms that the presence of any

contaminated land associated with HAIL activities within the site can be appropriately managed to accommodate the industrial development, including through a Remediation Action Plan (**RAP**) and Site Management Plan (**SMP**).

Resource consent will be required under Regulation 10 of the NES-CS as a Restricted Discretionary Activity. On this basis, any requirements of the NES-CS can be addressed as part of the application post-referral and potential risks to human health can be appropriately managed and mitigated.

4.10 New Zealand Coastal Policy Statement

The New Zealand Coastal Policy Statement (**NZCPS**) sets out a number of objectives and policies for achieving the purpose of the RMA in relation to the coastal environment of New Zealand. As the site is not located within the close vicinity to the coastal environment, it is considered that the NZCPS is not relevant to the proposed activity.

5.0 Assessment of Effects

5.1 Construction

Earthworks

Earthworks will be carried out in accordance with best practice appropriate erosion and sediment control measures to avoid and mitigate adverse environmental effects. All sediment and erosion control measures will be designed in accordance with the Waikato Regional Council 'Sedimentation and Erosion Control Guideline'. All earthworks will also be managed in accordance with an Erosion and Sediment Control Plan ('**ESCP**') and any adverse dust effects can be appropriately managed with standard conditions of consent.

Construction Noise & Vibration

During construction, noise and vibration is anticipated to occur as a result of the works proposed to be carried out on the site. Construction will be managed in accordance with the NZS 6803:1999 Acoustics – Construction Noise and German Standard DIN 4150-3:1999 Structural vibration – Effects of vibration on structures.

Construction noise and vibration will be managed in accordance with a Construction Noise and Vibration Management Plan ('**CNVMP**'). The CNVMP will outline measures, such as restrictions on days and hours on noisy works, consultation with neighbours and use of quieter machinery (among others) to ensure that potential construction noise effects of the project are appropriately managed.

Contaminated Land

As outlined above, a PSI has been undertaken by HDGeo, which confirms the likely presence of contamination associated with HAIL activities as a result of the existing dairy farm. Activities including earthworks and subdivision is therefore likely to trigger resource consent under the NESCS and WRP at the locations where HIAL activities have been identified.

The PSI confirms that the presence of any contaminated land associated with HAIL activities within the site can be appropriately managed to accommodate the industrial development, including through a RAP and SMP as part of the substantive application. It is therefore considered that any potential contaminated land

effects can be appropriately managed through the resource consent requirements under the NESCS and WRP.

Stability

A preliminary Geotechnical Report has been prepared by HDGeo. Their findings confirm the presence of geotechnical related natural hazards within the site and that these should not preclude development from occurring. Further investigations undertaken as part of the substantive application will define existing potential hazards and ensure that any development risks can be avoided or mitigated through engineering design, including for earthworks and foundation design, and during construction. Based on these findings, it is considered that the site can accommodate the proposed development and that any land stability effects can be avoided and mitigated.

5.2 Archaeology

An Archaeology Assessment has been prepared by RedOx and is included at **Attachment 6**. The site includes an archaeology site (S14/508) that includes remnants of a historic field drain that traverses the site in an approximate east-west alignment. The drain has largely been infilled, however this archaeology site has the potential to provide evidence of early European land use in the area.

As there is an existing archaeology site, RedOx has identified that an application to HNZPT will be required and that mitigation measures can be developed through an Archaeological Site Management Plan and may include archaeological fieldwork, sampling, recording and reporting.

As outlined above an application for an Archaeological Authority will be made to HNZTP as part of the substantive application where an Archaeological Site Management Plan will be developed and informed through further engagement and consultation with iwi and hapū. It is considered that any potential adverse archaeology effects can be appropriately managed under the provisions of the Heritage New Zealand Pouhere Taonga Act 2014.

5.3 Infrastructure & Servicing

The preliminary infrastructure and servicing strategy for Greenhill Industrial Park is summarised below and is further detailed in the Infrastructure Technical Memorandum prepared by Maven included at **Attachment 6**.

- **Stormwater:** The proposed stormwater strategy includes new public stormwater networks design to comply with the Waikato Regional Infrastructure Technical Specifications and other relevant technical standards and located within new road corridors where possible. The design strategy will incorporate stormwater management devices as necessary, including appropriately sized wetlands and detention basins, swales, and a treatment train approach to stormwater quality treatment.
- **Water Supply:** Numerous potential design options are available to provide for potable and firefighting water supply, including through a combination of connecting to the existing public network and utilising on-lot solutions such as rainwater harvesting. The configuration of the water supply strategy will be confirmed through detailed design undertaken as part of the substantive application.
- **Wastewater:** Maven has identified three public network connection options that can be further investigated through detailed design as part of the substantive application and the preferred solution will be progressed in consultation with Hamilton City Council. In this case, on-lot at source treatment,

and disposal, while technically feasible, is not preferred as it may constrain industrial uses and reduce development yield.

Overall, the Infrastructure Technical Memorandum confirms that the site can be adequately serviced. Therefore, it is considered that there will not be any significant adverse effects in relation to infrastructure and servicing.

5.4 Transportation

A transportation assessment has been prepared by CKL (**Attachment 10**) to identify and evaluate potential traffic effects arising from the proposed development. Their assessment identifies that the primary traffic effects of the proposal relate to increased traffic volumes on Greenhill Road, Puketaha Road, and their intersections with the surrounding road network. It is anticipated that effects associated with road capacity and increased traffic volumes can be adequately addressed through localised road and intersection upgrades. Further traffic modelling will be undertaken to confirm the detailed design of roading upgrades and the development triggers for undertaking the works. Overall, it is considered that any potential transport effects can be appropriately avoided and mitigated, including through further modelling and detailed design as part of the substantive application.

5.5 Hydrogeological Effects

A hydrogeological assessment has been prepared by WGA (**Attachment 11**) to assess potential hydrological effects resulting from earthworks and excavations, the operation of a production bore, on-site infrastructure, and the abstraction of surface water from the Waikato River.

Their assessment confirms that all activities which have the potential to interact with groundwater and water supply can be appropriately managed through the implementation of suitable conditions.

5.6 Character and Amenity

An Urban Design assessment has been prepared by Barker & Associates and is included at **Attachment 12**. In summary, the assessment finds that the proposal will enable industrial development within the site and given the Site's rural context and high visibility from SH1 and local roads, design quality will need to be carefully considered to ensure that the proposal can integrate with existing character and amenity values. The Greenhill Industrial Park masterplan has been designed to ensure this can be achieved through:

- A coherent and ordered industrial precinct with clear public frontages and site access;
- Enabling transitions to rural-residential edges through setbacks, buffer planting and lower-intensity lot typologies;
- Incorporating rural residential lots closest existing residential developments. The proposed rural residential lots are of a scale and pattern that is in keeping with that of the existing environment; and
- Enabling an improved 'gateway' along key corridors, particularly where the development addresses SH1 and the interchange.

Overall, it is considered that the Greenhill Industrial Park masterplan has been design to ensure future character and amenity effects can be appropriately avoided and mitigate through the implementation of design measures, which will be further refined as part of the substantive application.

5.7 Landscape & Visual

A Landscape and Visual Effects Memorandum has been prepared by Barker & Associates (**Attachment 13**), identifying the potential effects of the development on character and visual amenity and potential measures which can be implemented to appropriately address the resulting change in the landscape and to the urban form.

The identified measures are set out below, and will be further explored and incorporated as part of the substantive application.

- **Strengthen Green Infrastructure Framework:** Retain and restore drainage lines and riparian margins with indigenous planting as ecological spines, and connect them through greenways and open-space networks to maintain continuity and openness across the development.
- **Sensitive Perimeter Design:** Incorporate larger lots, lower building heights, and boundary buffer planting/open space along Greenhill and Puketaha Roads to create a sympathetic rural interface and reduce visual dominance.
- **Integration with the Broader Landscape:** Use planting palettes and landscape treatments that is in keeping with the existing rural character of shelterbelts and hedgerows, providing continuity while transitioning to an urban form.
- **Cultural Landscape Integration:** Embed cultural narratives into the design of public or communal space.
- **Manage Sensory Changes:** Locate high-activity uses away from rural edges and use planting/design measures to minimise lighting and noise spill onto neighbouring properties.
- **Enhance Public Realm Quality:** Integrate reserves, stormwater areas, and walking/cycling routes into a cohesive, accessible network and incorporate planting to enhance the quality of the public realm.

5.8 Noise

An acoustic assessment has been prepared by Styles Group (**Attachment 14**) and identifies the likely noise effects arising from the proposal and potential mechanisms that are available to manage those effects. In summary, their assessment finds:

- Construction noise and vibration can generally be undertaken in compliance with the relevant noise and vibration limits. Exceedances are likely to be temporary and intermittent, and can be appropriately managed through the preparation of a Construction Noise and Vibration Management Plan;
- Noise received outside of the site boundaries can be appropriately managed through the existing provisions which manage maximum noise received at notional boundaries of adjacent rural sites. Additionally, Styles Group identify that there is the option, through the substantive application, to seek resource consent to enable noise limits which exceed the current allowable maximum by 5 decibels to achieve consistency with district plan rules which manage the interface noise effects between industrial and residential or rural zones. Their assessment confirms that this option is likely to be acceptable in terms of providing for the appropriate manage of noise effects within the surrounding environment, subject to detailed analysis being undertaken as part of the substantive application;
- Noise generated within Greenhill Industrial Park can be readily managed between future industrial, commercial, and rural-residential activities, including through the use of activity based land use controls to be refined as part of the substantive application. An example may be to require any new

sensitive activities treated. This will ensure that new industrial activities are not unnecessarily restricted and that new sensitive activities are adequately protected in terms of noise and amenity effects; and

- The WDP-OP includes acoustic treatment requirements for noise sensitive activities inside the Waikato Expressway noise control boundary, and these can be complied with where required, such as for the proposed Rural-Residential lot. The majority of industrial and commercial activities are excluded from the acoustic treatment requirements as they are not defined as noise sensitive activities.

Overall, Styles Group concludes that the Greenhill Industrial park can be designed to achieve compatibility with the level of acoustic amenity that is anticipated under the WDP-OP. In particular, design options are available to appropriately managed noise effects between new industrial and commercial activities and both the proposed rural-residential lots and existing properties within the surrounding environment.

5.9 Cultural

The project is not located on land returned under a Treaty Settlement, nor does it fall within a Treaty Settlement Statutory Acknowledgement area.

Extensive engagement has been undertaken with iwi throughout the life of the project and will continue as it progresses. Letters of support confirm that engagement has been undertaken to date. Through continued, meaningful engagement, it is anticipated that any potential adverse cultural effects can be appropriately avoided, remedied, or mitigated.

It is also anticipated that the substantive application will implement appropriate cultural protocols (such as karakia, cultural monitors, and site-specific procedures), enable iwi and hapū involvement in the design process, and incorporate indigenous planting. These measures collectively ensure that cultural values are embedded within the project's design and delivery.

In addition, there is a Memorandum of Understanding (**MOU**) between the Applicant and Ngaati Wairere for the site with respect to the following (but limited to):

- Ongoing engagement and communication with Ngaati Wairere;
- Acknowledgement of settlement legislation;
- Archaeological protocols;
- The preparation of a Cultural Values Assessment (**CVA**).

5.10 Ecology

An assessment of ecological matters has been undertaken by EcoLogical Solutions (**Attachment 5**), identifying the existing terrestrial and freshwater ecological features across the site and providing an overview of their value.

Existing terrestrial vegetation is dominated by exotic trees and hedgerows and there are no Significant Natural Areas, or notable trees within the site. A limited number of native podocarp are located within the north western portion of the site. In terms of freshwater ecology, a modified watercourse traverses the site as well as a series of artificial streams and three constructed ponds. Two indicative wetlands have been identified on the north western side.

EcoLogical Solutions has identified the potential effects of the proposed development on ecological values and the potential approaches that can be undertaken to ensure these effects can be appropriately managed. Overall, this includes:

- The preparation and implementation of management plans with respect to the removal of predominantly exotic vegetation and habitats. A management plan would address any effects on birds, lizards and bats to ensure they can be avoided and/or adequately mitigated or offset as required;
- Restoration of stream reaches, including stream realignment to a more natural pattern and naturalisation to ensure there is not net loss of extent or ecological values as a result of culverting;
- The implementation of necessary erosion and sediment control measures to manage sediment and contaminant discharge to downstream receiving environments;
- The treatment of wastewater prior to discharge or connection to a wastewater network. Should on-site disposal be required, the effects of any wastewater discharge can be managed to ensure the discharge water quality is consistent with the receiving environment;
- The design of new culverts in accordance with best practice solutions to manage fish passage;
- Biosecurity protocols can manage the risk of weed introduction; and
- Any loss of low quality natural inland wetland habitat will be addressed via avoidance where practicable, and where loss cannot be avoided, onsite offsetting (within the Project Area) will be implemented. A provisional area of six hectares has been identified for wetland creation if required. To maximise the ecological benefits, this area would be integrated with the proposed watercourse realignment and restoration and stormwater basins. It is expected that collectively, this would achieve an ecological net-gain.

In addition to these management approaches, EcoLogical Solutions identify positive effects, including riparian restoration along the main watercourse, removal or upgrading of existing culverts to improve fish passage, and landscape planting that will increase the amount of habitat for fauna and promote connectivity between habitats.

For these reasons, it is considered that that actual and potential effects of the proposal on ecological values can be appropriately managed, including in accordance with the effects management hierarchy where this is applicable.

5.11 Soils

As outlined above and in the LUC Classification Assessment at **Attachment 7**, the site is underlain by class 2, 3, and 4 soils. (refer **Figure 6** below). All class 2 and 3 soils meet the definition of 'highly productive land' under the NPS-HPL while only class 2 soils shown meet the definition of 'high class soil' under the WDP-OP.

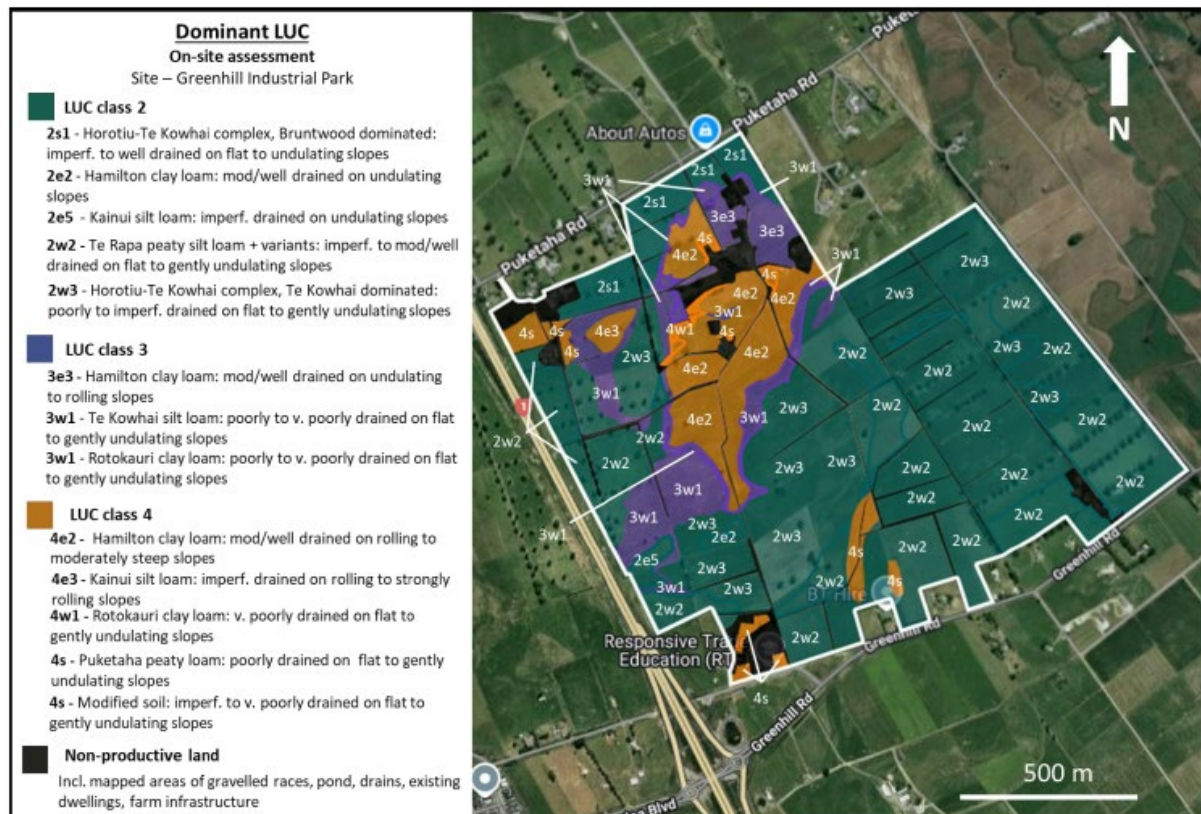


Figure 6: Distribution of dominant LUC units for the site (source: Landsystems).

Overall, Landsystem’s assessment finds that the extent of class 2 soils within regional scale maps are overstated, and that the land has land use limitations due to erosion susceptibility, poor to imperfect drainage, and seasonal soil wetness. Around 36% of the land is poorly drained (LUC 2w3, 3w1, 4w1), making it unsuitable for intensive horticulture or year-round cropping. Around 40% of the area (LUC 2w2) consists of artificially drained peat soils, which remain vulnerable to drainage deterioration and have restricted trafficability in wet months. Sloped land (11%) is prone to erosion and is also restricted in terms of accommodating long term productive activities.

In addition, their assessment also finds that the location and prevalence of non-productive class 4 soil in combination with non-productive areas which bisect the site through the north-western portion, will restrict continuous land-based primary production under a single land use. In particular, the contiguous area of class 4 land and non-productive land results in the surrounding productive and high class soils being isolated and fragmented, limiting the size and cohesion of areas that can be utilised for more intensive land uses.

On this basis, it is considered that the potential adverse effects of urban development and the loss of highly productive and high class/high quality soil are outweighed by the benefit of providing much needed industrial land supply in the Waikato region and in a location that is well located and accessible to regional scale transport infrastructure.

5.12 Positive Effects

Greenhill Industrial Park will deliver a number of positive effects, including but not limited to:

- Increase industrial land supply that will address projected shortfalls across Hamilton City;
- Within the masterplan, enable a variety of site sizes that are suitable for different business sectors;

- Provide for the efficient use of existing transport infrastructure, as the site is highly accessible to and from the Waikato Expressway in both directions;
- Provide for new employment opportunities within close proximity to established residential areas;
- Enhancement of ecological values through new planting within riparian areas and watercourse realignment and naturalisation; and
- Generation of a wide range of economic benefits, including providing new employment opportunities and GDP value add, as set out in Section 1.6 and the Economic Assessment.

5.13 Mitigation

This memorandum and supporting information from technical experts identify a range of measures to address potential adverse effects of the proposal, and ensure that those effects are avoided, remedied, or mitigated.

This includes the application of standard and well-established mitigation measures as well as targeted responses to manage the effects of this proposal. These can be addressed through design, conditions of consent, and monitoring.

6.0 Engagement and Consultation

The applicant has undertaken engagement and consultation with key stakeholders, and the outcomes are summarised below and included in the Consultation Summary included at **Attachment 15**. A summary of the Copies of the meeting minutes and feedback received from key stakeholders are included at **Attachments 16-22**.

The Fast-track Amendment Bill introduced amendments to the consultation requirements set out in section 11 of the FTAA. As engagement and consultation for Greenhill Industrial park was commenced prior to these changes, the work undertaken to date is considered to satisfy the previous consultation requirements as well as the newly introduced consultation and notification requirements under section 11.

- **Future Proof Committee** – On 26 November 2025, a meeting was held online with the Future Proof Partners (including Hamilton City Council, Waikato District Council, Waikato Regional Council and NZTA) to discuss the Greenhill Industrial Park referral application. The consultation pack and Greenhill Industrial Park masterplan was presented and initial Future Proof Partners feedback discussed. Key discussion points included:
 - Stormwater – catchment complexity, treatment hierarchy, blue green integration and esplanade reserves
 - Water and wastewater – servicing preference, firefighting provisions, network upgrades, earthworks risk and water take
 - Transport – collector road role, roundabout integration, trip generation, multi modal travel, constraints and NZTA designation
 - Parks, open space and ecology - offsetting strategy, species monitoring and ICMP alignment
 - Land use – masterplan flexibility, lot mix rationale, urban realm quality and transmission corridor

Refer to **Attachment 16**, for evidence of the pre-lodgement consultation.

- **Iwi and hapū** – Ongoing engagement has been undertaken with Ngaati Wairere, Ngāti Hauā, and Waikato-Tainui. A series of hui have been held to discuss the project and the referral application, complemented by a site walkover on 17 November 2025 to discuss and review the masterplan and overall proposal. Following these discussions, two letters of support for the referral application has been received from hapū and it is understood that these are generally supported by Waikato-Tainui. In addition, a MOU has been entered into between the applicant and Ngaati Wairere. Refer to **Attachment 17** for supporting documentation.
- **Department of Conservation (DOC)** - Pre-lodgement consultation initiated via formal application to DoC email at Fasttrackapplicationenquires@doc.govt.nz. Subsequently, we have provided DoC with a copy of the consultation pack and supporting specialist ecological report. We are engaging with DoC on the Wildlife Act Authority as part of this consultation and will continue to meet further with the DoC project lead as we move towards a substantive application. Evidence of pre-lodgement consultation is outlined in **Attachment 18**.
- **Heritage New Zealand Pouhere Taonga (HNZPT)** – Pre-lodgement consultation initiated via formal email to HNZPT. The email provided an overarching description of the proposal and a copy of the Archaeology Report prepared by RedOx, with acknowledgement that an Archaeology Authority will be required and developed as part of a substantive application. HNZPT replied via email confirming receipt. Evidence of this is outlined in **Attachment 19**.
- **Ministry for the Environment (MfE)** - Pre-lodgement consultation initiated via formal email to MfE at AdminAgencyFTAA@mfe.govt.nz. The email provided an overarching description of the proposal and a copy of the masterplan. MfE replied via email confirming the consultation request with a Section 11 letter attached outlining the national direction under the RMA that requires consideration. Evidence of pre-lodgement consultation is outlined in **Attachment 20**.
- **Ministry of Education (MoE)** - Pre-lodgement consultation initiated via formal email. Subsequently, we had a meeting with key MoE representatives to present the consultation pack and discuss any feedback or concerns specifically from a schooling perspective as well as the broader proposal. Following the meeting, the consultation pack and meeting minutes were circulated to MoE. Subsequently, B&A received email confirmation to confirm that MoE were supportive of the proposal and had no further feedback. Evidence of the pre-lodgement consultation is outlined in **Attachment 21**.
- **New Zealand Transport Agency (NZTA)** – Pre-lodgement consultation initiated via formal email. Subsequently, we had a meeting with key NZTA representatives to present the consultation pack and discuss any feedback or concerns specifically in relation to the State Highway and the transport network. Following the meeting, the consultation pack and meeting minutes were circulated to NZTA. Evidence of the pre-lodgement consultation is outlined in **Attachment 22**.

7.0 Conclusion

Having undertaken a high-level planning assessment, it is considered that there are no planning-related reasons why Greenhill Industrial Park could not proceed under the Fast-Track Approvals Act 2024. Through strong design and technical input, Greenhill can achieve a built form, environment and community that positively impact future residents and the wider Waikato community, without having an adverse effect on the environment.

It is acknowledged that a full and comprehensive Assessment of Environmental Effects will be undertaken as part of the resource consent application, however at this stage, no more than minor adverse effects have been identified that preclude the development from occurring.