

Hon Tama Potaka

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing



4 June 2026

Hon. Chris Bishop
Minister for Infrastructure
infrastructure.portfolio@parliament.govt.nz
Parliament Buildings
Private Bag 18041
WELLINGTON 6160

Tēnā koe Hon. Bishop,

Thank you for your invitation to comment on the fast-track consent application for the proposed consolidation of racing and training activities (currently at Te Rapa, Cambridge, and Te Awamutu) to a single site within the Waikato District and development of other land uses on the site including a retirement village of around 300 places and around 50 residential lots.

The Waikato District is experiencing strong growth, with total dwelling demand projected to increase by around 58 per cent over 2020–2050 and urban demand nearly doubling. Alongside the housing enabled on the site itself, consolidation to a single racing site could enable the redevelopment of existing racecourse land, with potential capacity for approximately 1,200 to 1,700 additional dwellings, helping to meet increasing housing demand.

The proposed site is zoned rural and has not been identified for urban development in long-term strategic planning documents. These planning considerations, alongside infrastructure, transport, and cross-boundary issues, are likely to be raised by the council. In particular, the scale and location of the proposal mean that transport effects, infrastructure servicing, and integration with existing networks will require careful assessment. This includes wastewater and water supply constraints, transport impacts on the local and wider network, and proximity to Hamilton Airport.

While these issues are significant, they can be addressed through the detailed consenting stage. Accordingly, I have no objection from the perspective of the Housing Portfolio to this project being referred to the next stage. Thank you again for the opportunity to comment.

Mauriora,

A handwritten signature in blue ink that reads "Tama Potaka".

Hon Tama Potaka
Associate Minister of Housing

Hon Shane Jones

Minister for Oceans and Fisheries
Minister for Regional Development
Minister for Resources
Associate Minister of Finance
Associate Minister for Energy



4 June 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act 2024 – Waikato Thoroughbred Racing Greenfield Racing Hub referral application (FTAA-2604-1215)

Dear Chris,

Thank you for the opportunity to comment on this referral application under the Fast-track Approvals Act 2024 (FTAA 2024).

The FTAA 2024 has been established to provide a regime that makes it easier and quicker for regionally and nationally significant infrastructure projects to gain the approvals needed for development, in support of this Government's economic growth objectives.

I have considered the application and its alignment with the priorities of my Regional Development portfolio. My comments are attached as **Annex One**.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'S. Jones'.

Hon Shane Jones
Minister for Regional Development

Annex One – Regional Development comments

Project overview

1. Waikato Thoroughbred Racing Incorporated has applied for Fast-track approval for a greenfield racing hub in Tamahere, Hamilton comprised of:
 - a. racetracks and racing infrastructure (including buildings, stabling, training facilities)
 - b. 15,000m² of bloodstock sale yard and stabling
 - c. a retirement development comprised of 200 units, 70 villas and a community centre
 - d. around 40 blocks of residential lifestyle lots and a 4,000m² commercial development
 - e. 5,000m² of commercial equine services.
2. Waikato Thoroughbred Racing Incorporated has provided an economic assessment to support its application for the development. The project is estimated to provide:
 - a. total estimated additional GDP of \$138.00 million over the eight-year development period (a \$17.25 million annual GDP contribution)
 - b. 399 full-time equivalent (FTE) years of employment created during the peak development year
 - c. a total of 1,156 FTE years of employment created over the eight-year development period.
3. The quantified benefits provided by the applicant relate to the development phase. The economic assessment also outlines ongoing qualitative benefits of the project once it is completed, including:
 - a. long-term horseracing industry and productivity gains
 - b. regional employment and income generation
 - c. increased event-based expenditure and visitor economy benefits.

Comments

4. Given the scale of the projected economic benefits during the development phase as set out in the application's economic assessment, the project may deliver significant regional economic benefits. The provision of quantified economic estimates of the ongoing economic benefits of the project once completed would make the regional significance of the project clearer.
5. Comments on potential impacts of the proposal's horseracing, housing and retirement developments on the racing, housing and aged care portfolios should be provided by the relevant responsible Ministers.

From: [Infrastructure Portfolio](#)
To: [FTAreferrals](#)
Subject: FW: invitation to comment on Fast-track referral application for the Waikato Thoroughbred Racing Greenfield Racing Hub under the Fast-track Approvals Act 2024 – FTAA-2604-1215
Date: Wednesday, 27 May 2026 11:43:48 am

From: Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Sent: Wednesday, 27 May 2026 11:43 AM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: RE: invitation to comment on Fast-track referral application for the Waikato Thoroughbred Racing Greenfield Racing Hub under the Fast-track Approvals Act 2024 – FTAA-2604-1215

Good morning,

Confirming Hon Paul Goldsmith, Minister for Arts, Culture and Heritage has no comment.

Kind Regards,



Office of Hon Paul Goldsmith

Minister for Arts Culture and Heritage | Minister of Justice
Minister for Media and Communications | Minister for Pacific Peoples
Minister for the Public Service and Digitising Government
Minister for Treaty of Waitangi Negotiations

Email p.goldsmith@ministers.govt.nz | www.beehive.govt.nz

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

From: Infrastructure Portfolio
Sent: Wednesday, 13 May 2026 7:39 AM
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Shane Jones (MIN) <S.Jones@ministers.govt.nz>; Nicola Grigg (MIN) <N.Grigg@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Winston Peters (MIN) <W.Peters@ministers.govt.nz>; Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>; Casey Costello (MIN) <C.Costello@ministers.govt.nz>
Cc: FTAreferalls <ftareferalls@mfe.govt.nz>
Subject: Invitation to comment on Fast-track referral application for the Waikato Thoroughbred Racing Greenfield Racing Hub under the Fast-track Approvals Act 2024 – FTAA-2604-1215

To:

- Minister for Economic Growth
- Minister for Regional Development
- Minister for the Environment
- Minister for Māori Crown Relations: Te Arawhiti
- Minister for Māori Development
- Minister of Conservation
- Associate Minister of Housing
- Minister for Racing
- Minister for Arts, Culture and Heritage
- Minister for Seniors

NOTE - This project lodged an application after 31 March 2026, therefore a 15-day comment period applies.

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister), has asked for me to write to you on his behalf.

The Minister has received an application from Waikato Thoroughbred Racing Incorporated for referral of Waikato

Thoroughbred Racing Greenfield Racing Hub project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2604-1215).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **15 working days** of receipt of this email, being **4 June 2026**. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferrals@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Minister for Infrastructure's office they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform my office and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

| | |
|---------------------|---|
| Project name | Waikato Thoroughbred Racing Greenfield Racing Hub |
| Applicant | Waikato Thoroughbred Racing Incorporated |
| Location | Tamahere, Waikato |

Project description

The project is a greenfield racing hub and residential development across approximately 164 hectares in the Waikato District. This project would consolidate existing thoroughbred racing facilities at Te Rapa racecourse, Cambridge racecourse and Waipā racecourse, along with the Cambridge harness raceway, with a single 'state-of-the-art' Hub. The project includes:

- a. thoroughbred racing and associated activities, including:
 - i. a racing facility with a main track and 1200m starting chute
 - ii. facilities for race days, industry functions and events
 - iii. a 1400m thoroughbred training track
 - iv. a 500m warmup track
 - v. on-site stables and yards for trainers' allotments
 - vi. a bloodstock office and sales business across approximately 63,200m² with barns, yarding, sales pavilion and administration
 - vii. an operations and events building across approximately 2,041m² with a parade ring and tie up
- b. harness racing, including:
 - i. a 1000m harness racing and training track
 - ii. facilities for race days, industry functions and events
 - iii. on site stables and yard for trainers' allotments
- c. other land uses, including:
 - i. a retirement residential development with approximately 70-80 single storey villas, approximately 200 attached units and a community centre
 - ii. a residential precinct with approximately 40-50 lots
 - iii. an equestrian events ring
 - iv. facilities to host temporary events
 - v. a village centre including a bar, café and other small scale commercial activity
 - vi. three parking areas for up to 2,030 vehicles
 - vii. commercial equine support services
 - viii. rehabilitation of the existing Kahikatea stand within the project site
 - ix. all associated infrastructure and earthworks including roading upgrades.

Kind regards,



Office of Hon Chris Bishop

Attorney-General | Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport | Associate Minister of Finance | MP for Hutt South

Office: 04 817 6802 | EW 6.3

Email: c.bishop@ministers.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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From: [Margot Dow](#)
To: [Maria Kerr](#)
Subject: RE: Invite to request to comment | Waikato Thoroughbred Racing
Date: Monday, 18 May 2026 10:59:49 am

Thanks Maria, office has declined the opportunity to comment on this application at this time.

Kind regards

Margot



**Margot Dow | Private Secretary – Racing | Office of Rt Hon Winston Peters
Minister of Foreign Affairs | Minister for Racing | Minister for Rail | Leader of New Zealand First
7.4EW, Parliament Buildings, Wellington 6160, New Zealand**

M: s 9(2)(a) | **DDI:** s 9(2)(a)
Email: s 9(2)(a) | **Website:** www.Beehive.govt.nz

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Please note information about meetings related to the Ministers' portfolios will be proactively released (this does not include personal or constituency matters). For each meeting in scope, the summary would list: date, time (start and finish), brief description, location, who the meeting was with, and the portfolio. If you attend a meeting with the Minister on behalf of an organisation, the name of the organisation will be released. If you are a senior staff member at an organisation, or meet with the Minister in your personal capacity, your name may also be released. The location of the meeting will be released, unless it is a private residence. The proactive release will be consistent with the provisions in the Official Information Act, including privacy considerations. Under the Privacy Act 1993 you have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, or are concerned about the release of your information in the meeting disclosure, please contact the sender. You can read more about the proactive release policy at <https://www.dia.govt.nz/Proactive-Releases#MS>

From: Maria Kerr s 9(2)(a)
Sent: Wednesday, 13 May 2026 4:06 PM
To: Margot Dow <Margot.Dow@parliament.govt.nz>
Subject: Invite to request to comment | Waikato Thoroughbred Racing

Hi Margot

You may have received an invite to comment on a Referral application, on behalf of the Minister for Infrastructure, under the Fast-track Approvals Act 2024.

A separate email was sent that contains a link to enable portal registration and profile set up. *Please note: the link has a 72-hour expiry. You will need to let us know if the link has expired.

*Attached, please find the step-by-step user guidance document to assist you with portal access.

Once you have activated the account by accepting the terms and conditions (please read them), you will have access to the 'live' application.

If you have any queries or need assistance with creating a portal account, please contact: contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

Ngā mihi

Maria
Fast-track Operations (Referrals team)



8 June 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0033167

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on application FTAA-2604-1215 Waikato Thoroughbred Racing Greenfield Racing Hub. I am providing comment in my capacity as Minister for Economic Growth, focusing on whether the application is likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided.

Waikato Thoroughbred Racing Greenfield Racing Hub, FTAA-2604-1215

The proposal is to establish a greenfield equine racing hub at Tamahere, consolidating existing thoroughbred and harness facilities into a single purpose-built racing, training and bloodstock precinct with supporting commercial and residential components. The project is located on a 164-hectare site, with construction expected to commence in 2032, subject to approvals and funding, and operations targeted for the 2036 racing season.

The economic assessment provided by the applicant estimates total direct expenditure of approximately \$406.3 million over the development period, excluding land. The project is estimated to contribute \$138 million to the Waikato Region's GDP over the eight-year development period. Over this time the total employment impact is estimated at approximately 1,156 FTE-years, including 439 direct and 717 indirect and induced FTE-years. These economic impacts are largely retained within the Waikato regional economy.

The primary quantified benefits are driven by development-phase expenditure rather than ongoing operations. Ongoing benefits include improved racing industry efficiency through consolidation, increased visitor activity, and enhanced bloodstock market capability. Potential housing and urban development gains from the redevelopment of existing racecourse sites are identified but remain indirect and unquantified.

On this basis and having regard to the information provided by the applicant, the proposal may be assessed as having the potential to deliver significant regional economic benefits under section 22(2)(a)(iv) of the Fast-track Approvals Act.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis'.

Hon Nicola Willis
Minister for Economic Growth

Hon Tama Potaka

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing



4 June 2026

By email: infrastructure.portfolio@parliament.govt.nz

Tēnā koe Minister Bishop,

Invitation to comment on the Waikato Thoroughbred Racing Greenfield Racing Hub project under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on the Waikato Thoroughbred Racing Greenfield Racing Hub project under section 17 of the Fast-track Approvals Act 2024.

I have considered the application and its alignment with my portfolios as Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report prepared by the Ministry for the Environment.

Nāku noa, nā

A handwritten signature in blue ink that reads 'Tama Potaka'.

Hon Tama Potaka

Te Minita mō Te Arawhiti me Te Minita Whanaketanga Māori
Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

Your written comments on a project under the Fast Track Approvals Act 2024

| | |
|---------------------|---|
| Project name | Waikato Thoroughbred Racing Greenfield Racing Hub |
|---------------------|---|

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

| 1. Contact Details | | | |
|--|------------------------------|--------------------|--|
| Please ensure that you have authority to comment on the application on behalf of those named on this form. | | | |
| *Portfolio | Seniors | | |
| *First name | Hon Casey | | |
| *Last name | Costello | | |
| Contact person (if different from above) | | | |
| *Contact phone number | +64 4 817 6827 | Alternative | |
| *Email | c.costello@ministers.govt.nz | | |

| 2. Please provide your comments on this application |
|---|
| My comments are attached below. |

Minister's signoff



Hon Casey Costello

Minister for Seniors

Date 30/5/26



Minister of Customs
Minister for Seniors
Associate Minister of Health
Associate Minister of Immigration
Associate Minister of Police

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act referral application: Waikato Thoroughbred Racing Greenfield Racing Hub, FTAA-2604-1215

Dear Chris,

Thank you for the opportunity to comment as Minister for Seniors on this application for referral under the Fast-track Approvals Act 2024 (the Act).

I have considered whether this application is likely to '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)', under s22(2)(a)(iii) of the Act, based on the information provided in the application. I will leave it to you and other relevant Ministers to assess the other criteria.

The following aspects of the project are likely to meet this criterion:

- The construction of 40 to 50 residential housing lots and a retirement living community containing 70 to 80 single-storey villas and 200 attached units.

Based on this information, the project is suitable for referral to the fast-track process. If the application is referred, I would welcome the opportunity to comment on the project in more detail.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'C' followed by a horizontal line.

Hon Casey Costello

Minister for Seniors

Your written comments on a project under the Fast Track Approvals Act 2024

| | |
|---------------------|---|
| Project name | Waikato Thoroughbred Racing Greenfield Racing Hub |
|---------------------|---|

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

| 1. Contact Details | | | |
|--|---|--------------------|--|
| Please ensure that you have authority to comment on the application on behalf of those named on this form. | | | |
| Organisation name (if relevant) | Department of Conservation (DOC) | | |
| *First name | Bridgette | | |
| *Last name | Munro | | |
| Postal address | | | |
| *Contact phone number | s 9(2)(a) | Alternative | |
| *Email | Fast-track@doc.govt.nz; | | |

2. Please provide your comments on this application

Comments follow overleaf.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manager's signoff

Jenni Fitzgerald

4th of June 2026

Director-General of Conservation s17 comments

| | |
|--------------------------------|---|
| Project name | Waikato Thoroughbred Racing Greenfield Racing Hub |
| Applicant name | Waikato Thoroughbred Racing Incorporated |
| Application number | FTAA-2604-1215 |
| Project summary details | <p>The Waikato Thoroughbred Racing Greenfield Racing Hub project (the 'Project') is a greenfield racing hub and residential development across approximately 164 hectares in the Waikato District, intended to replace (consolidate) existing thoroughbred racing facilities at Te Rapa racecourse, Cambridge racecourse and Waipā racecourse, along with the Cambridge harness raceway, with a single 'state-of-the-art' Hub.</p> <p>The Project includes:</p> <p>a. thoroughbred racing and associated activities, including:</p> <ol style="list-style-type: none"> i. a racing facility with a main track and 1200m starting chute; ii. facilities for race days, industry functions and events; iii. a 1400m thoroughbred training track; iv. a 500m warmup track; v. on-site stables and yards for trainers' allotments; vi. a bloodstock office and sales business across approximately 63,200m² with barns, yarding, sales pavilion and administration; vii. an operations and events building across approximately 2,041m² with a parade ring and tie up. <p>b. harness racing, including:</p> <ol style="list-style-type: none"> i. a 1000m harness racing and training track; ii. facilities for race days, industry functions and events; iii. on site stables and yard for trainers' allotments. <p>c. other land uses, including:</p> <ol style="list-style-type: none"> i. a retirement residential development with approximately 70-80 single-storey villas, approximately 200 attached units and a community centre; ii. a residential precinct with approximately 40-50 lots; iii. an equestrian events ring; iv. facilities to host temporary events; v. a village centre including a bar, café and other small scale commercial activity; |

| | |
|--|--|
| | <p>vi. three parking areas for up to 2,030 vehicles;</p> <p>vii. commercial equine support services;</p> <p>viii. rehabilitation of the existing Kahikatea stand within the project site;</p> <p>ix. all associated infrastructure and earthworks including roading upgrades.</p> <p>The applicant seeks the following approvals through the fast-track approvals process to authorise the Project:</p> <ul style="list-style-type: none"> • resource consents under the Resource Management Act 1991 ('RMA'); • approval under the Wildlife Act 1953; • archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2013. <p>The Project site is not located on Public Conservation Land ('PCL').</p> <p>Subdivision of the subject titles involved in the Project is noted as being a prohibited activity under the Waikato District Plan pursuant to Rules 25.5(e) and SUB-R40 Prohibited Subdivision as all of the titles subject to the Project have title issue dates post December 1997 and contain high-class soil with more than one additional Lot being proposed to be created from each parent title.</p> |
|--|--|

1. General comment

- 1.1.1. As the Project includes an approval under a specified Act for which DOC is the administering agency (being the Wildlife Act 1953), the applicant was required to notify DOC in accordance with section 11 of the Fast Track Approvals Act 2024 (the 'FTAA' or the 'Act').
- 1.1.2. In relation to this application, the applicant took steps to engage with DOC prior to lodging. DOC was notified on the 15th of January 2026. Initial engagement meetings were held on the 5th of February 2026, at which time it was noted that the plans for the site were to be updated. A further meeting was held on the 19th of March 2026. At this meeting it was noted that further information would be provided. An updated Ecological Impact Assessment, with updated Site Plans, was provided on the 9th of April 2026, with further updated plans provided on the 15th of April 2026. Following this, the referral application was lodged on the 17th of April 2026.
- 1.1.3. The applicant requested that DOC provide a comprehensive response to the application. DOC's feedback was provided on the 24th of April 2026.
- 1.1.4. While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, DOC considers that it is likely that with the appropriate design and conditions, effects can be managed to appropriate levels.

2. Minister's decision on referral application

- 2.1.1. FTAA sections 21 and 22 set out matters to be considered in determining whether a referral application should be accepted.
- 2.1.2. DOC notes that other agencies are better placed to comment on most matters, including those in section 22. Comments below are therefore targeted to sections where DOC has specific interests or information relevant to the Minister's decision.
- 2.1.3. For completeness, DOC has considered the criteria for assessing referral applications in section 22 and has not identified anything it considers the Minister should take into account that has not already been acknowledged by the Applicant in its referral application.
- 2.1.4. Section 21(3) and (4) set out when the Minister may/must decline a referral application. DOC has considered these criteria and comments as follows:

| Section | Criteria | Comments |
|----------|--|--|
| 21(3)(b) | Does the project involve an ineligible activity | DOC has considered section 5(1) (f), (h), (i), (j) and (k) of the Act. DOC has not identified any aspect of the Project that would be ineligible under these sections. |
| 21(3)(c) | Is there adequate information to inform a decision | DOC considers that there is adequate information to evaluate the proposal in terms of a referral decision. With regard to bats, a bat survey has found bat activity throughout the Project site. Bat activity was higher in the kahikatea stand than at other sites, and the kahikatea wetland is likely the most important area within the site for bats. However, DOC records that this does not mean that the rest of the site is not important, as it represents a dark area where bats can commute and forage. This Project would effectively remove or compromise much of the existing 160 ha bat habitat. Given this, if the Project is referred the potential substantive application should include appropriate mitigation for bats, including extending and building on the lighting strategies proposed within the referral application. |
| 21(4) | Are there any other reasons not specified | DOC has not identified any other reasons why the Project should not be referred. |

| Section | Criteria | Comments |
|----------|---|---|
| 21(5)(a) | <p>Is the project inconsistent with:</p> <ul style="list-style-type: none"> • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011. | <p>DOC has not identified any inconsistency with any relevant settlement or other obligation.</p> <p>Relevant Treaty Settlement Acts are:</p> <ul style="list-style-type: none"> • Ngati Tuwharetoa, Raukawa, and Te Arawa River Iwi Waikato River Act 2010; • Nga Wai o Maniapoto (Waipa River) Act 2012; • Waikato Tainui Raupatu Claims (Waikato River) Settlement Act 2010; • Ngāti Hauā Claims Settlement Act 2014; <p>Treaty settlements under negotiation</p> <p>It is noted that there are Treaty settlements under negotiation including:</p> <ul style="list-style-type: none"> • Waikato Tainui – Remaining Claims <p>It is not yet clear what impact this Treaty settlement may have, however, the indicated area of interest includes the Project site.</p> |
| 21(5)(b) | <p>Would it be more appropriate to deal with the proposed approvals under another Act(s)</p> | <p>DOC has not identified any reason why the Wildlife Act approval should not be dealt with under the FTAA.</p> |
| 21(5)(c) | <p>Would the project have significant adverse effects on the environment</p> | <p>Due to the scale of development proposed for the Project site, DOC considers the Project may have significant adverse effects on any ecological values that are present.</p> <p>However, based on our knowledge of the existing environment and species expected to occur on the site, our understanding of the Project, and our experience of the kinds of design measures and conditions that could be implemented, DOC considers that once more detailed information is available, it would be possible to achieve a project with the imposition of conditions (that are appropriate, enforceable, include best management practice, and apply the relevant ecological management plans, as and where required), that does not have significant adverse effects on the environment.</p> |

UNCLASSIFIED

| Section | Criteria | Comments |
|----------|--|--|
| 21(5)(d) | Does the applicant(s) have a poor compliance history under a specified Act | DOC has not identified any issues with the Applicant's compliance history. |
| 21(5)(g) | Would a substantive application have any competing applications | No competing applications have been identified. |

2.1.5. Section 22 sets out the criteria for the Minister for accepting a referral application. DOC has considered these criteria and comments as follows:

| Section | Criteria | Comments |
|--------------|--|--|
| 22(1A) | Is there a relevant Government policy statement? | No Government policy statements have been issued under s10A. |
| 22(1)(b)(i) | Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes? | A Wildlife Act approval would generally take approximately three-four months to process, which is not significantly longer than the FTAA process is expected to take. However, there may be benefits for the Applicant in terms of consideration being combined with RMA approvals (rather than being advanced by a separate process) and given the different decision-making framework under the FTAA. |
| 22(2)(a)(ix) | Will this project address significant environmental issues? | No. |
| 22(2)(a)(x) | Is the project consistent with local or regional planning document, including spatial strategies? | <p>The following DOC Statutory Planning documents are relevant to the Proposal:</p> <ul style="list-style-type: none"> • Conservation General Policy 2005 ('CGP'); • Waikato Conservation Management Strategy 2014. <p>The Proposal is not inconsistent with the relevant statutory planning provisions. However, consideration should be given to:</p> <ul style="list-style-type: none"> • The relevant provisions in Te Ture Whaimana with respect to streams which are tributaries of the Waikato River; • Maintaining and restoring the ecological integrity of relevant ecosystems and habitat types; • Conserving any threatened and at-risk species to ensure their persistence; • Protecting freshwater fish habitat, fish passage and the maintenance of habitat connectivity and water quality of any waterway. |

| | | |
|--------------|---|---|
| <p>22(b)</p> | <p>Any other matters the Minister may consider as relevant?</p> | <ul style="list-style-type: none"> • The applicant has determined a Wildlife Act approval is required to handle, capture and relocate salvaged lizards, if discovered on-site, including any accidental killing. Assessments should be undertaken to confirm lizard presence and mitigation needs and relocation in preparing the potential substantive application. It is unclear whether the kahikatea stand is intended to be utilised as a relocation site, or what predator management will occur there. Further, the referral application notes that further specialist reporting will determine if any other approvals will be sought as part of the Wildlife Act approval. DOC agrees that any further approvals should be identified ahead of lodging the potential substantive application. • There is the potential for At-Risk Declining and Threatened, Nationally Vulnerable fish species being present on the Project Site. Any existing or new fish passage barriers, such as perched culvert pipes or crossings/fords etc. between the wetland habitat and the property boundary should be made fish friendly and passable at all times. • Long-tailed bats are common within the Hamilton Ecological District, and likely to visit the Project site. Artificial lights at the Project site could interrupt and negatively affect the behavioural patterns of these Threatened – Nationally Critical – species if it is not adequately mitigated. |
|--------------|---|---|

3. Other considerations

- 3.1.1. DOC notes that once a referral decision is made, the scope of any subsequent substantive application is confined by that of the referral application. DOC has provided input to a number of fast-track projects to-date where additional conservation approvals that would have been available under the FTAA have not been included in an application. In some of these cases it has been necessary for applicants to seek additional approvals under the specified Acts via normal processing. This can result in inefficiencies, additional costs and undermining of the benefits of the ‘one stop shop’ approach the FTAA was designed to deliver.
- 3.1.2. Given the lack of assessment undertaken at the referral stage, DOC considers it may be beneficial for the applicant to consider whether it should seek to include additional approvals

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that would potentially be required on a precautionary basis. To this end, DOC suggests the Minister consider whether further information should be sought from the applicant under s20 prior to making their decision to ensure all approvals in scope of the FTAA and necessary to implement the project are included.

- 3.1.3. In particular, DOC recommends consideration is given to whether a complex freshwater fisheries activity approval is required, given that waterways may be diverted and culverts may be implemented as part of the Project. Details of the potential approvals required were provided to the applicant as part of the preliminary consultation process.

4. Matters for the Minister to specify (s27)

- 4.1.1 None identified.



Jenni Fitzgerald
Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 4th of June 2025

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Your written comments on a project under the Fast Track Approvals Act 2024

| | |
|---------------------|---|
| Project name | Waikato Thoroughbred Racing - Greenfield Racing Hub |
|---------------------|---|

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

| 1. Contact Details | | | |
|--|---------------------------------|--------------------|-----------|
| Please ensure that you have authority to comment on the application on behalf of those named on this form. | | | |
| Organisation name (if relevant) | Hamilton City Council | | |
| *First name | Juliana | | |
| *Last name | Reu Junqueira | | |
| Postal address | Private Bag 3010, Hamilton 3204 | | |
| *Contact phone number | s 9(2)(a) | Alternative | s 9(2)(a) |
| *Email | s 9(2)(a) | | |

| 2. Please provide your comments on this application |
|--|
| If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages. |

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

Dr Juliana Reu Junqueira

Date: 3 June 2026

3 June 2026

Ilana Miller
General Manager, Delivery and Operations
Minister for Infrastructure
C/o Ministry for the Environment
contact@fasttrack.govt.nz

Dear Ilana

FAST-TRACK PROPOSAL: Waikato Thoroughbred Racing, Greenfield Racing Hub - Reference FTAA-2604-1215

Thank you for the invitation to provide written comments on the Waikato Thoroughbred Racing referral application under the Fast-track Approvals Act 2024.

We note the application is within Waikato District, and Waikato District Council has been invited under section 17(1) as the relevant local authority. We also note Hamilton City Council has been identified as an 'other person' under section 17(5), given the project's location within the Future Proof area and near the City's boundary.

Should you have any queries regarding the content of this document please contact me.

Kind Regards,



Dr Juliana Reu Junqueira
Director Urban & Spatial Planning Unit | Strategy, Growth & Planning Group
Hamilton City Council

s 9(2)(a)

Cc: Blair Bowcott
General Manager – Strategy, Growth & Planning Group
Hamilton City Council

s 9(2)(a)

Hamilton City Council Comments:

In summary, the application proposes a development comprising:

| Activity | Composition |
|---------------------------------|--|
| A major racing and training hub | 1200m main track, 1400m training track, and 500m warm-up track. |
| Associated racing facilities | Stables, yards, offices, barns, lounges, a sales pavilion, and function/event spaces. |
| Commercial equine services | Approx. 1.8ha GFA |
| Village centre | Approx. 1.5ha incorporating small-scale commercial activities, cafés, bars, and retail. |
| Retirement village, | Approx. 1.7ha GFA. 70 - 80 single-storey villas, 200 attached units, and a community centre. |
| Rural lifestyle residential | Approx. 40 lots of 0.25ha each |
| Parking | Accommodate up to 2,030 vehicles |

Hamilton City Council (HCC) provides the following comments in response to the referral application for the Waikato Thoroughbred Racing Greenfield Hub. HCC has been identified as an 'other person' for the purposes of section 17(5), and due to the proposal's proximity to the city and its location within the wider Future Proof area. These comments are provided to assist the Minister in considering cross-boundary implications in relation to growth, infrastructure, and transport, and do not represent a position of support or opposition.

1. Strategic Land Use and Growth Considerations:

The proposal to consolidate racing activities across the Waikato region has the potential to enable the retirement of the Te Rapa Racecourse within Hamilton and its transition to alternative urban uses. The Te Rapa site, approximately 50ha in size, has already undergone a private plan change to enable 6ha of residential development, with the balance of the land providing a significant opportunity for future urban redevelopment. This presents a strategic future opportunity for Hamilton, given the Te Rapa site's location between the main industrial zone and the northern CBD intensification areas. Its proximity to employment, key transport corridors, and existing infrastructure supports more efficient use of land within the area.

It is important to acknowledge that the proposed racing Greenfield hub itself is located within a rural area that is not identified for urban development in long-term strategic planning documents. As noted in the Waikato District Council Statement of Facts letter, the site is zoned for rural purposes and sits outside established growth areas. While the proposal may deliver regional benefits through consolidation and land conversion elsewhere, the development represents a departure from planned land use patterns.

The inclusion of a retirement village and rural lifestyle residential components further exacerbates the departure. Locating these uses within a rural area may contribute to a more dispersed and less efficient settlement pattern, where access to services, public transport and amenities is limited. This has the potential to precipitate further urban development in the surrounding area.

2. Infrastructure and Servicing Considerations:

The site is located approximately 5.5km south of HCC urban limits and is not currently serviced by City water, wastewater, or HCC local roading networks.

The following sections provide additional detail on relevant infrastructure matters:

a) Water supply

The proposal relies on local on-site supply, including the treatment and collection of roof water, with no connection to existing reticulated networks proposed. Given the proposed scale and nature of operations including race day events anticipating more than 6,000 people, as well as a retirement village with permanent residents, it is likely that the applicant would be classified as a self-supplier for water services. This would trigger associated onerous obligations for drinking water safety, treatment and compliance. In this context, the applicant is encouraged to engage early with Taumata Arowai - the Water Services Authority in this respect as such obligations may affect the way in which servicing is done and cost.

b) Wastewater

The proposal relies on on-site wastewater treatment and disposal to land, with no connection to reticulated networks identified. Given the scale and intensity of development, including periodic peak loadings associated with major race-day events, it will be important that the treatment system is designed to accommodate a wide range of flows and loading conditions. Consideration should also be given to the long-term performance and resilience of the system, including cumulative and downstream effects. The design and location of disposal fields will need to be carefully managed in relation to surrounding land uses, existing and neighbouring development, and the proximity of the Waikato River within the wider catchment.

c) Stormwater

Stormwater and flood management has been assessed through a detailed modelling approach to evaluate existing conditions, catchment behaviour, and potential post-development effects. The assessment identifies distinct catchments, quantifies inflows and outflows, and outlines an approach aimed at achieving hydraulic neutrality.

While this provides a robust technical foundation, further refinement will be required as the design progresses. Detailed design will need to confirm how proposed stormwater infrastructure will respond to final site layout, primary and secondary overland flow paths, storage capacity, and ongoing consideration of downstream effects and avoidance of any impacts beyond the site.

3. Transport:

While the proposal does not directly connect into HCC's local roading network, it is anticipated that both regular and peak traffic generated by the development will have indirect effects on transport networks within Hamilton, noting that a significant proportion of trips are expected to originate from the city. Traffic effects on the surrounding local road network, including Pencarrow Road, Duncan Road and connections to State Highway 1, have been assessed at a strategic level through the Integrated Transport Assessment. This includes the use of Waikato Regional Transport Model (WRTM) outputs to inform intersection modelling, however further interrogation of sub-regional and Hamilton network effects would be beneficial in understanding potential impacts on the Hamilton transport network. The

presence of the Te Awa cycleway adjacent to the site is also noted, and opportunities to integrate active transport connections and manage potential interface effects should be considered as part of detailed design.

Summary

HCC's comments are provided to assist the Minister in considering the broader cross-boundary and strategic implications of the proposal. These comments identify matters relevant to regional growth management, infrastructure planning, and transport integration that may warrant consideration in the referral decision.

Thank you,



Dr Juliana Reu Junqueira

Director Urban & Spatial Planning Unit | Strategy, Growth & Planning Group
Hamilton City Council



Comments on referral application under the Fast Track Approvals Act 2024

Waikato Thoroughbred Racing Greenfield Racing Hub
FTAA-2604-1215

| Contact Details | |
|-------------------|--|
| Organisation Name | Heritage New Zealand Pouhere Taonga (HNZPT) |
| Contact person | HNZPT Fast-track Team |
| Contact Number | (04) 470 8053 |
| Email | fasttrack@heritage.org.nz |

General Comments

1. Waikato Thoroughbred Racing Incorporated (Applicant) has lodged an application for referral of the Waikato Thoroughbred Racing Greenfield Racing Hub (Project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. In accordance with section 17(1)(c) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the referral application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.
3. HNZPT has been provided application documents that are relevant to the archaeological authority application. These have been assessed and HNZPT comments as follows:

Consultation and Engagement

4. HNZPT staff attended an online meeting on 22 January 2026 where the overall project was introduced. Staff were advised that an archaeological assessment was being prepared.

Archaeological Authority Application

5. The Applicant has provided an archaeological assessment that identifies one recorded archaeological site within the project area. The proposed project works will modify or destroy part of the recorded site. As such, an archaeological authority is required prior to earthworks commencing.
6. HNZPT notes that the archaeological assessment recommends part of archaeological site S15/573 to be protected by a covenant, and that the Fast Track Referral Application Planning Memo prepared by BCD Group Ltd states that the applicant intends to implement this recommendation.
7. The project area is of significance to Ngaati Hauaa and Ngaati Koroki Kahukura. This area is of high cultural value as it was a known gardening area 'Te Koopu maania o Kirikiriroa me oona maara kai'.



8. HNZPT notes that Ngaati Hauaa and Ngaati Koroki Kahukura have been consulted with.
9. HNPZT notes that a Cultural Impact Assessment has not been provided with this application. The applicant should explore commissioning a report to understand the cultural impacts of this development and how these can be mitigated.

Effects on Archaeological Values

10. In order to understand the archaeological values and identify means to mitigate the adverse effects on these values, HNZPT will need to be provided with further information from the Applicant.

Conclusion

11. If the project is referred, HNZPT anticipates further engagement with the Applicant to ensure all relevant documentation is provided with a substantive application, including:
 - A fulsome archaeological assessment, including an appraisal of the potential to encounter unrecorded archaeological sites;
 - Details of the covenant that is proposed for part of S15/573;
 - Appropriate draft management plan and archaeological research strategy;
 - Evidence of appropriate consultation with tangata whenua, including any Cultural Impact Assessments produced;
 - Appropriate draft conditions.

Your written comments on a project under the Fast Track Approvals Act 2024

| | |
|---------------------|---|
| Project name | Waikato Thoroughbred Racing Greenfield Racing Hub |
|---------------------|---|

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All sections of this form with an asterisk (*) must be completed.

| 1. Contact Details | | | |
|--|------------------------------------|--------------------|--|
| Please ensure that you have authority to comment on the application on behalf of those named on this form. | | | |
| Organisation name (if relevant) | NZ Transport Agency | | |
| *First name | Nicola | | |
| *Last name | Foran | | |
| Postal address | | | |
| *Contact phone number | s 9(2)(a) | Alternative | |
| *Email | environmentalplanning@nzta.govt.nz | | |

| 2. Please provide your comments on this application |
|--|
| <p>NZTA thanks the Minister for the opportunity to comment on the referral of this application into the fast-track approvals process.</p> <p>NZTA has had prior pre-application engagement with Waikato Thoroughbred Racing ('the Applicant') and BCD Group Limited ('the Agent') regarding the proposed Waikato Thoroughbred Racing Greenfield Racing Hub project ('the Project') on several occasions between December 2025 and March 2026.</p> <p>Based on the pre-application engagement, and upon review of the documents submitted as part this application, NZTA recommends that the following matters are addressed in any substantive application for the Project:</p> <p><u>Scope of Proposal and Trip Generation and Distribution</u></p> <p>The Integrated Transport Assessment (ITA) prepared by BCD Group Limited quantifies the anticipated trip generation volumes and trip distribution percentages for the racing and training days and residential component of the Project. However, the Assessment of Environmental Effects (AEE) report, also prepared by BCD Group Limited, identifies that other ancillary activities, including a village centre and small-scale commercial activities, may also be proposed in the future. The ITA has not assessed the anticipated trip generation volumes or trip distribution percentages for these activities, which have the</p> |

potential to further adversely impact on the wider state highway network in the vicinity of the site and the Hamilton Southern Links (HSL) Roads of National Significance (RoNS).

NZTA would therefore need to see the ITA revised as part of any substantive application to quantify and include the anticipated trip generation volumes and trip distribution percentages for any proposed ancillary activities in order to assess the impacts of those activities on the wider state highway network in the vicinity of the site and HSL RoNS.

It is also unclear in the ITA whether or not the trip distribution assumptions consider the completion of the HSL RoNS. On this basis, NZTA would also need to see the ITA revised as part of any substantive application to clarify this.

Cumulative Traffic Effects on the State Highway Network

The Project will not gain direct access onto State Highway 1; rather, it will gain access to the surrounding local road network consisting of Pencarrow Road, Hooker Road, and Duncan Road. The operation of the Project, however, may influence traffic volumes and future capacity levels around the State Highway 1 Tamahere Interchange, surrounding intersections within the state highway network, and HSL RoNS infrastructure. This Project may therefore result in adverse cumulative traffic effects on these areas.

NZTA would therefore need to see the ITA revised as part of any substantive application for this Project to fully understand the potential traffic impacts this Project will have on these areas and any associated mitigation measures that may be implemented to address these impacts.

Traffic Modelling and Level of Service (LoS) Assessments

The ITA incorporates the indicative concept design of the HSL RoNS in its baseline, future (2035 and 2045) and development traffic modelling scenarios, and Level of Service (LoS) assessments, which also include a 'No (Hamilton) Southern Links' scenario. The HSL RoNS is also assessed as providing additional resilience and long-term mitigation for adverse road performance, LoS, and traffic distribution effects because of the traffic distribution through the indicative design.

The HSL RoNS has yet to receive uncommitted funding and potential route changes; particularly the proposed flyover connection to Tamahere Drive, are yet to be confirmed. NZTA would therefore need to see the ITA revised as part of any substantive application to include and assess the impacts of the Project on any potential future network changes to the HSL RoNS and any associated mitigation measures. NZTA would be more than willing to work with the Applicant to provide this data.

The ITA also does not identify any increase in the number of vehicles queuing on the northbound off-ramp on the State Highway 1 Tamahere Interchange in the 2035 traffic modelling assessment, nor does it address whether that offramp has sufficient space for deceleration and queuing. NZTA would also need to see the ITA revised as part of any substantive application to clarify these matters.

Event Traffic Management

NZTA previously advised the Agent during the pre-application engagement stage that an assessment of potential traffic delays and traffic information for the annual Field Days event at the Mystery Creek Events Centre; which is approximately 10km south of the site, was to be included in the ITA. The ITA also notes that State Highway 1 and State Highway 21 are expected to have a significant role in the accommodation and distribution of event-related regional traffic to and from the site.

The assessment on the potential traffic effects and information for the annual Field Days event has not been included in the ITA and NZTA would therefore need the ITA to be revised to include this information and to confirm the size of events on the site which would trigger the need for an Event Management Traffic Plan (EMTP) on State Highway 1 or State Highway 21.

Construction Traffic Management

The ITA states that whilst construction access will be via the local road network, any Construction Traffic Management Plan (CTMP) prepared as part of this Project will ensure that the operation and safety of the state highway network is considered and managed in consultation with NZTA and identify and address the relationship between the local road network and state highway network.

NZTA would therefore need to see the ITA revised as part of any substantive application to include further discussion on how any CTMP will address the relationship between the local road and state highway networks, and any draft conditions of consent which address CTMPs for this Project.

Lighting and Reverse Sensitivity

The proposed back training and warm up tracks for the Project are adjacent to the State Highway 1 corridor and the lighting assessment prepared by Dr Richard Dluzniak Consulting Pty Limited states that the illuminance level at these tracks are expected to be 20 lux. This exceeds the maximum 10 lux requirement under rule LIGHT-R2 Glare and artificial light spill at the road boundary and sites in the GRUZ – General Rural Zone under the Waikato District Plan – Operative in Part 2024 and is one of the reasons for resource consent for this Project.

NZTA would need to see the lighting assessment revised as part of any substantive application to confirm the lux levels at all the site boundaries in relation to the State Highway 1 corridor and associated mitigation measures.

Peer Review of ITA

The Transportation Peer Review prepared by Don McKenzie Consulting was completed before the version of the ITA that was submitted as part of this Application and dated 17 April 2026. NZTA would therefore need confirmation from the Agent that any revised ITA would be peer reviewed again prior to its submission as part of any substantive application.

Conclusion

Overall, NZTA does not have any concerns with this Project, Waikato Thoroughbred Racing Greenfield Racing Hub, being referred to the fast-tracked approvals process. NZTA would welcome the opportunity to provide comments on any substantive application for this Project in due course.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

Nicola Foran

Date 28 May 2026

Your written comments on a project under the Fast Track Approvals Act 2024

| | |
|---------------------|--|
| Project name | FTAA-2604-1215 Waikato Thoroughbred Racing Greenfield Racing Hub |
|---------------------|--|

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All sections of this form with an asterisk (*) must be completed.

| 1. Contact Details | | |
|--|-----------------------------------|------------------------------|
| Please ensure that you have authority to comment on the application on behalf of those named on this form. | | |
| Organisation name (if relevant) | Waikato District Council | |
| *First name | Donna | |
| *Last name | Tracey | |
| Postal address | Private Bag 544, Ngaruawahia 3742 | |
| *Contact phone number | 0800 492 452 | Alternative s 9(2)(a) |
| *Email | s 9(2)(a) | |

| 2. Please provide your comments on this application |
|--|
| If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages. |

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Craig Hobbs

Chief Executive

Date 28 May 2026

28 May 2026

Stephanie Frame
Manager, Fast-track Operations
Ministry for the Environment
referral@fasttrack.govt.nz

Dear Stephanie Frame

FAST-TRACK PROPOSAL: Waikato Thoroughbred Racing Greenfield Racing Hub - Reference FTAA-2604- 1215

Thank you for inviting Waikato District Council (WDC) to provide written comments on the Referral Application for Waikato Thoroughbred Racing Greenfield Racing Hub.

Please find attached staff response and general comments regarding the proposed subject site.

Should you have any queries regarding the content of this document please contact Donna Tracey, Cross Boundary Growth Manager
s 9(2)(a)

Kind Regards



Craig Hobbs
CHIEF EXECUTIVE
WAIKATO DISTRICT COUNCIL

Mandatory Comments

Council, under section 17(3) of the Act and without limiting any general comments under subsection (1)(a), provides comments advising on the following matters:

Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.

No such applications exist for the properties identified in the referral application.

General Comments

The proposed Waikato Thoroughbred Racing development is located within the Waikato District with access from Pencarrow Road, Hooker Road, and Duncan Road. The site adjoins the Waikato Expressway but does not propose direct state highway access. The land is zoned for rural purposes and has not been identified for urban development in long-term strategic planning documents.

The proposal forms part of the consolidation of racing and training activities currently undertaken at Te Rapa, Cambridge, and Te Awamutu. Consolidation to a single site would enable these existing racecourse sites to be vacated and potentially redeveloped.

Collectively, redevelopment of the Waipā and Cambridge racecourse sites has the potential to accommodate approximately 1,190 to 1,660 new dwellings, depending on future zoning and development outcomes. This would represent a substantial contribution to Waipā District's short-to medium-term housing supply, achieved through redevelopment of existing urban land rather than outward greenfield expansion.

Redevelopment of the Te Rapa Racecourse also presents opportunities to provide additional residential and light industrial land within an established industrial node in Hamilton City.

Consolidation of racecourse activities therefore has region-wide implications across multiple territorial authority areas in relation to housing supply, land-use efficiency, and growth management.

WDC recommends that, if this Referral Application is approved, the Panel appointed by the Environmental Protection Authority adequately considers

engagement with all adjoining properties in relation to reverse sensitivity, visual amenity, lighting effects, noise, and hours of operation.

WDC further recommends that the Panel works with Council and NZTA to ensure a comprehensive assessment of transport impacts on both the local road network and the State Highway network.

Your written comments on a project under the Fast Track Approvals Act 2024

| | |
|---------------------|---|
| Project name | Waikato Thoroughbred Racing Greenfield Racing Hub |
|---------------------|---|

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| 1. Contact Details | | | |
|--|--|--------------------|-----------|
| Please ensure that you have authority to comment on the application on behalf of those named on this form. | | | |
| Organisation name (if relevant) | Waikato Regional Airport Limited | | |
| *First name | Robert | | |
| *Last name | Dol | | |
| Postal address | Hamilton Airport, Airport Road, RD 2, Hamilton 3282, New Zealand | | |
| *Contact phone number | s 9(2)(a) | Alternative | s 9(2)(a) |
| *Email | s 9(2)(a) | | |

| 2. Please provide your comments on this application |
|--|
| <p>Thank you for the invitation to provide written comments on the Waikato Thoroughbred Racing Greenfield Racing Hub (FTA-2604-1215) referral application under the Fast-Track Approval Act 2024.</p> <p>Based on the applicant's information provided the comments below summaries key matters that in Waikato Regional Airport Limited (WRAL)'s, belief should shape both any referral decision and the information requirements for a substantive application.</p> <p>WRAL is generally supportive of regionally significant development initiatives that contribute to economic growth and enhance the Waikato's profile.</p> <p>However, this support is subject to ensuring that the proposal appropriately recognises and addresses the operational requirements of Hamilton Airport, particularly in relation to aircraft noise effects and the management of reverse sensitivity.</p> <p>WRAL's primary concern relates to the potential for reverse sensitivity effects arising from the establishment of activities within an area influenced by aircraft operations, including arrival and departure flight paths. Aircraft movements generate intermittent but high-intensity</p> |

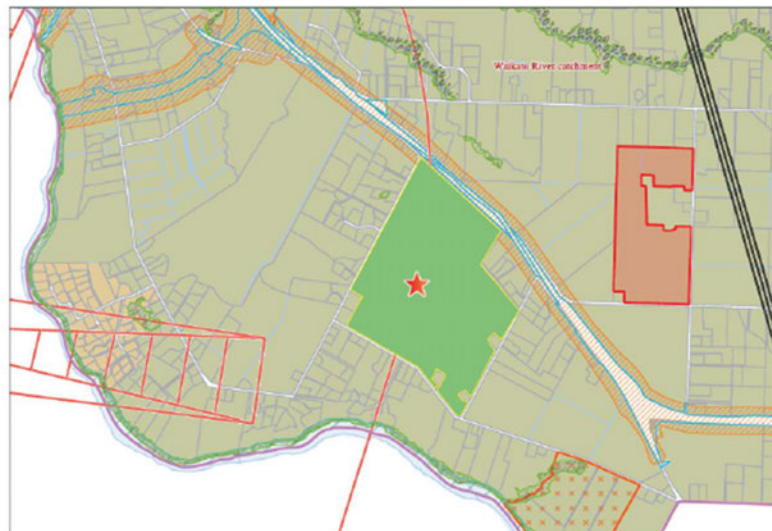
Insert Fast-track logo

noise events, especially during take-off and approach phases, which extend beyond the airport boundary and are managed through established inner and outer control boundaries.

Without appropriate mitigation and recognition of this environment, the proposed development could give rise to future expectations or pressures to constrain airport operations. Such outcomes would be inconsistent with the airport's strategic importance to the Waikato region and its role in supporting regional connectivity and economic development.

Accordingly, while WRAL is generally supportive of the proposal, it is essential that Hamilton Airport's concerns are fully addressed. In particular, WRAL seeks assurance that:

- The proposal explicitly recognises existing and future airport operations and associated aircraft noise effects within the relevant control boundaries.
- Appropriate measures are implemented to avoid, remedy, or mitigate reverse sensitivity effects, including consideration of building design, acoustic treatment, and operational practices where relevant.
- All parties involved in or associated with the development are made aware of the airport environment, including regular overhead aircraft movements and associated noise.
- The development will not result in any direct or indirect constraints on current or future airport operations, while we note the application confirms compliance with Airport Noise (ANOC-R6) and Obstacle Controls (ANOC-R1) the below images taken from appendices I (Urban Design Assessment Report) show the outer control boundaries cut through the applicant's site.



3.2.1 Waikato District Plan - Zone Planning Map

WRAL considers it critical that land use and development in proximity to Hamilton Airport is carefully managed to protect the safe and efficient operation of the airport, both now and into the future.

WRAL remains available to engage constructively with the applicant and relevant authorities to ensure that these potential effects are appropriately addressed.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

Handwritten signature in blue ink, appearing to read 'Robt Dol'.

Robert Dol General Manager Property & Infrastructure 4/6/2026

Your written comments on a project under the Fast Track Approvals Act 2024

| | |
|---------------------|---|
| Project name | Waikato Thoroughbred Racing Greenfield Racing Hub |
|---------------------|---|

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All sections of this form with an asterisk (*) must be completed.

| 1. Contact Details | | | |
|--|--|--------------------|--|
| Please ensure that you have authority to comment on the application on behalf of those named on this form. | | | |
| Organisation name (if relevant) | Waikato Regional Council | | |
| *First name | Michelle | | |
| *Last name | White | | |
| Postal address | Private Bag 3038 Waikato Mail Centre Hamilton 3240 | | |
| *Contact phone number | s 9(2)(a) | Alternative | |
| *Email | s 9(2)(a) | | |

| 2. Please provide your comments on this application |
|--|
| <p>If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.</p> <p>Waikato Regional Council (WRC) appreciates the opportunity to provide comments on this application for referral under the Fast-track Approvals Act 2024 (the Act).</p> <p>The comments outlined below are grouped into three sections and respond to the following matters:</p> <ul style="list-style-type: none"> • Matters under section 17(3)(a) of the Act that a local authority must provide comment on (PART A); • An invitation for WRC to consider if the “project may involve an ineligible activity (as defined in section 5 of the Act)” and if “any of the reasons to decline (under section 21(5) of the Act) a referral application may be applicable to this application” (PART B); • Additional comments, under section 17(3)(b) of the Act, relevant to the proposal (PART C). |

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PART A – SECTION 17(3)(a)

Are there any applications that have been lodged with Waikato Regional Council that would be competing applications if a substantive application for the project were lodged?

As of the date of this response WRC is not aware of any competing applications.

Are there any section 124C(1)(c) or 165ZI applications?

WRC can confirm that as of the date of this response, there are no competing applications or existing resource consents to which section 124C(1)(c) of the Resource Management Act 1991 (RMA) would apply if the approvals sought were to be applied for as a resource consent under that Act. Further, WRC can confirm that 165ZI of the RMA does not apply because the proposed project is not located in the common marine and coastal area in accordance with the Waikato Regional Coastal Plan (proposed or operative).

PART B - SECTION 5 and 21(5)

Does the project involve an ineligible activity (as defined in section 5 of the Act)?

WRC does not consider that the proposal involves an ineligible activity.

Are any of the reasons to decline (under section 21(5) of the Act) a referral application applicable?

WRC considers that the racecourse and its associated activities provide some strategic benefits including consolidation of racing operations currently undertaken at Te Rapa, Cambridge and Te Awamutu, as well as potential economic opportunities. Racing activities are also considered well suited to the rural environment. Accordingly, WRC does not consider there are grounds under section 21(5) of the Act to decline this aspect of the referral application.

Aspects of the referral, being the intensified residential development of the rural environment, do not align with the Future Proof Strategy, the Waikato Regional Policy Statement (WRPS) (particularly Change 1), and the accessibility requirements for a “well-functioning urban environment” as defined by the National Policy Statement on Urban Development (NPS-UD) 2020. This is exacerbated by the proposed development of a retirement village, potentially resulting in reliance on nearby urban centres (Hamilton) for essential services.

Further information on how these aspects of the proposal better align with these documents is requested within the substantive application should the referral be accepted.

Rural residential development on highly productive land (HPL) results in the permanent loss and fragmentation of regionally significant soils and potentially imposes inefficient infrastructure and servicing costs on councils. Low-density rural subdivision requires significant investment in roading, stormwater, community facilities, open spaces, and emergency response, with high ongoing maintenance costs.

Allowing rural residential development on HPL particularly Classes 1-2 in such circumstances undermines strategic growth planning and diverts resources away from existing efficiently serviced urban locations.

The above matters are further explained below.

- Current strategic planning: WRC considers that the residential lifestyle, retirement living and commercial components of the project are inconsistent with criterion (x) under section 22(2)(a) of the Act relating to regional or local planning documents.

The proposal is inconsistent with the Future Proof settlement pattern, which is embedded in the WRPS and the decisions version of Proposed WRPS Change 1 – NPS-UD and Future Proof Strategy Update (2023)¹. Specifically, Map 43 within Proposed WRPS Change 1 – Decisions version, depicts the Future Proof indicative urban and village enablement areas. The subject site is not identified as an urban enablement area on this map. The proposal therefore represents an unanticipated development. Given this, a number of specific provisions from the WRPS are relevant to the proposal and should be assessed. In particular, this includes Policy UFD-P11, Policy UFD-P14, Method UFD-M5, Method UFD-M49, Appendices APP11 – General development principles, and APP13 – Responsive planning criteria (out of sequence and unanticipated developments).

The site is also not identified for development in the Waikato District Growth and Economic Development Strategy (Waikato 2070).

Further information is requested within the substantive application that addresses how the residential lifestyle, retirement living and commercial components of the project are consistent with these documents.

- Retirement demand: Future Proof has recently undertaken a review of retirement living options in the Future Proof area². It concludes that “there is no justified exemption for retirement village activities in rural areas” and that “retirement housing should be close to services particularly health and public transport”.

The analysis shows that there are 11 retirement living options in Waikato district, including five independent living villages. Two independent living options are in Tamahere, close to the proposed Racing Hub site – comprising 51 apartments, 313 villas, and 187 care beds.

Given the location of the current proposal, on the boundary with Waipā district, it is important to also consider retirement options in Waipā. The analysis shows that there are currently 21 retirement living options in Waipā district, including 11 independent living villages. The largest surplus of retirement living supply across the Future Proof sub-region is in Waipā District. Current (and in progress) supply is projected to be sufficient to meet demand until around

¹ Proposed WRPS Change 1 is in the process of being made operative.

² Future Proof Retirement Living Report December 2025

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2040 under all scenarios, and even longer if growth and/or penetration is less than the high scenario.

Further information is requested within the substantive application that addresses whether there is demand for the retirement living component of this proposal in the short, medium and long term.

- Housing capacity: the latest Housing Development Capacity Assessment (2023)³ that supports the Future Proof Strategy, indicates a projected surplus of housing capacity in both Waikato and Waipā districts in the medium to long-term (2026 to 2052). This demonstrates that demand is already adequately provided for.

Additionally, consolidation of racing activities at Te Rapa, Cambridge and Te Awamutu enables existing racecourse sites to be vacated and redeveloped – representing a potential contribution to the housing supply in Waipā and Hamilton.

Further information is requested within the substantive application that addresses whether there is demand for the housing component of this proposal in the short, medium and long term.

- Commercial centre: the relevant policy in the WRPS is UFD-P13, which states that *commercial development is to be managed to support and sustain the vitality and viability of existing commercial centres* (listed in APP12).

The Future Proof Business Capacity Assessment (2023)⁴ identifies a sufficient supply of commercial land in the short and medium terms in Waipā and Waikato districts. A shortfall is identified in the long-term, however, given that commercial (and retail) land is able to be developed more intensively, generating larger amounts of floorspace, identified shortfalls in commercial land capacity (when translated to floorspace) become less of an issue. Therefore, additional commercial floorspace is not needed, particularly not in a rural location.

- Highly productive land: the site meets the definition of ‘HPL’ under the National Policy Statement for Highly Productive Land 2022 (NPS-HPL) and ‘high-class soils’ under the WRPS. Much of the site comprises Land Use Capability (LUC) Class 1 and 2 soils, with the exception of an area of LUC class 4 located adjacent to Pencarrow Road. The relevant clauses in the NPS-HPL are 3.8 – *avoiding subdivision of highly productive land*, 3.9 – *protecting highly productive land from inappropriate use and development*, and 3.10 – *exemption for highly productive land subject to permanent or long-term constraints*. The relevant policy in the WRPS is LFP11, which seeks to *avoid a decline in the availability of high-class soils for primary production due to inappropriate subdivision, use or development*.

³ Future Proof Residential Housing and Business Assessment December 2023

⁴ Future Proof Business Development Capacity Assessment 2023

Based on the information viewed by WRC staff, the loss of Class 1 and 2 soil with the development and in particular the retirement and residential components are not supported by demand in the short, medium and long term. Therefore, further information is requested within the substantive application that addresses these matters.

PART C – SECTION 17(3)(b)

In addition to the above comments, we highlight the following points for consideration. These must be addressed in any subsequent substantive application that may be lodged to enable a more detailed review to occur.

Waikato Regional Policy Statement

Te Ture Whaimana o Te Awa o Waikato

Te Ture Whaimana o Te Awa o Waikato - the Vision and Strategy for the Waikato River is incorporated into the WRPS and is relevant to this referral application. Given the site's location within the Waikato River catchment, any substantive application must address in further detail how the proposal will give effect to Te Ture Whaimana.

Urban form and development

This is outlined in Section B above.

Freshwater

There is a network of artificial watercourses throughout the site. The watercourses are classified as artificial, as confirmed with Waikato Regional Council. The relevant policy in the WRPS is LFP3, which seeks to *manage the effects of activities to maintain or enhance the identified values of freshwater bodies*. The relevant policies in the National Policy Statement for Freshwater Management (NPS-FM) are Policy 5 – *freshwater is managed to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved*, and Policy 9 – *the habitats of indigenous freshwater species are protected*.

The fish survey methods (trapping and eDNA) outlined in the Ecological Impact Assessment (EIA) (Appendix L) are considered appropriate, and the conclusion that the ecological value of these watercourses is 'low' is supported. As noted in the assessment, any works associated with the watercourses will require a Fish Management Plan to capture and relocate any fish.

Based on the Stormwater Modelling Report (Appendix E), it is expected that some or all of the existing watercourses will be infilled, resulting in a net loss of the waterway network. While these watercourses are artificial and considered to have low ecological value, they nevertheless provide important ecological functions, including habitat value and connectivity to downstream environments (e.g. catchment contribution and fish foraging area). Further assessment of the ecological function would be beneficial to determine how the proposal aligns with the NPS-FM.

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The on-site watercourses discharge into downstream systems of higher fisheries value, including the Mangaone Stream and the Waikato River. Accordingly, careful management is required to protect the ecological integrity of these receiving environments. The implementation of best practice measures for stormwater management, contaminant control, and hydrological management should be undertaken as part of site development to avoid adverse effects on these downstream water bodies.

Wetlands

The EIA identified one natural inland wetland, within the kahikatea stand. Other areas were also assessed, using an appropriate methodology, and WRC agrees with the conclusions made – that these plots are either non-wetland or pasture excluded wetlands.

The remnant kahikatea stand and natural inland wetland are of high ecological value. The relevant policy in the WRPS is LFP2, which seeks to *ensure that the significant values of wetlands are protected and where appropriate enhanced*. Policy 6 of the NPS-FM directs that – *there is no further loss of extent of natural wetlands, their values are protected, and their restoration is promoted*. In addition, Part 3, Subpart 1 (Natural inland wetlands) of the National Environmental Standards for Freshwater (NES-F) will also apply.

As mentioned above, part or all of the existing drains will be infilled. In this case, clause 52 of the NES-F will apply – *where the taking, use, damming, or diversion of water outside, but within a 100 m setback, from a natural inland wetland is a non-complying activity if it – results, or is likely to result, in the complete or partial drainage of all or part of a natural inland wetland*.

Provided the hydrological connectivity can be maintained, and works are kept outside the kahikatea stand and proposed restoration measures are implemented, there should be an overall positive effect on the natural inland wetland.

Mitigation measures should include complete fencing of the kahikatea stand, ongoing weed and pest control, and any necessary sediment and erosion controls for works undertaken near waterways that may drain into the wetland. Proposed planting should ensure that only wetland or wet-tolerant species are used (rather than more dry-adapted species) within the existing inland wetland, to maintain its ecological character. WRC also supports the recommendation to cease maintenance of watercourses immediately adjacent to the kahikatea remnant, and to consider revegetating these areas with native species, as this would improve water retention and benefit the wetland within the stand.

The substantive application would need to identify if the cessation of maintenance of watercourses is to occur and how this will be managed.

Ecology

Bats: the application will need to consider if light from the tracks and public lighting (as described in Lighting Overview – Appendix D) will influence bat activity. It appears the kahikatea stand is relatively close to the main track where there is a proposal to install 200 LED floodlights powered by diesel generators at 1000-2000 lux.

The noise impact on bats has not been considered as part of the EIA. This will need to be considered. Noise will be generated from day/night racecourse events (PA system, crowd noise), residential/commercial facilities, vehicles and diesel generators.

In addition, the 18m and 24m high masts will need to be considered in terms of bat activity.

WRC supports the preparation of a Bat Management Plan (BMP). The BMP should include what represents suitable replacement roosting habitat, if this will be a short- or long-term solution, and how the replacement habitat will be monitored to ensure success and suitability. It should also provide details on 'light' and 'dark' corridors for bat activity. The corridors should follow similar lighting controls as those proposed for the kahikatea block. To ensure consistency, suitable bat corridors should also be featured in the Urban Design Assessment Report (Appendix I).

Lizards: the EIA concluded that provided any adverse effects of the development on lizards and their habitats are considered and avoided, remedied or mitigated at the time of works, the overall effect on lizards is low.

To ensure that any adverse effects are considered, avoided, remedied or mitigated, a Lizard Management Plan should be prepared. This was not proposed in the EIA.

As suggested in the EIA, pre-clearance surveys and salvage should be undertaken for all areas that provide suitable habitat. Wildlife Act Authorisation and relocation sites should be detailed in the Lizard Management Plan.

Pest plants and animals: WRC recommends that a pest management plan is prepared and included within the substantive application.

Monitoring: a monitoring programme is recommended to track the effectiveness of the mitigation measures and included within the substantive application.

Acid Sulphate Soils

The applicant's assessment confirms there is a high probability of acid sulphate soils occurrence on the property based on the WRC Acid Sulphate Soil probability layer.

When disturbed (e.g. excavated) and exposed to oxygen, acid sulphate soil materials can produce sulfuric acid which can become mobilised following rainfall. This can lead to impacts on the environment, including aquatic ecosystems, and infrastructure.

The applicant has advised the next step is to undertake a more in-depth assessment to confirm the presence of acid sulphate soils and to develop a management plan for managing these soils. WRC supports this approach.

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Wastewater

WRC understands the proposal is to construct a private wastewater treatment plant, with disposal field(s) within the footprint of the development.

A detailed design supported by an assessment of effects of discharging treated wastewater to ground will be required as part of the substantive application to support a discharge consent application under the Discretionary rule 3.5.7.7.

Water Supply

The applicant has provided a breakdown of the development's range of water requirements. The total maximum daily demand is 589 m³/day, the total onsite supply is 515 m³/day, and the shortfall will be buffered by storage on site. A trickle feed from the local network is also proposed as an additional possibility to provide some redundancy.

An annual irrigation use volume of 85,000 m³ has been described. The anticipated maximum daily requirement and the area to be irrigated – daily and total – have not been provided. This information is key to understanding how reasonable and justifiable the use of the water for irrigation would be and what this component would represent for making an efficient allocation decision in terms of the overall development requirement.

For the other uses, annual volumes that reflect daily and seasonal variability where relevant have not been described. This information is key for making an efficient allocation decision in terms of the overall development requirement.

An integrated supply approach is proposed comprising a groundwater take via bore(s) of 500 m³/day and a surface water take via rainfall runoff harvesting of 15 m³/day, with an annual take volume of 92,500 m³/year. WRC understands the water needs for the proposal; however, a detailed assessment is required to determine the effects on other users and surface water once production bore(s) has been drilled and tested. WRC typically requires the detailed assessment to be carried out as part of a consent application process.

WRC understands water will be stored in 4 ponds with a combined volume of 62,000 m³. Taking water that has been dammed in ponds will require consent, under either 3.3.4.21 – *Restricted Discretionary Activity Rule – The Taking of Surface Water* or 3.3.4.23 *Discretionary Activity Rule – Surface Water Takes* or 3.3.4.26 *Non-Complying Activity Rule – Water Takes*.

Rainfall runoff harvesting will involve the diversion of water across the site and damming of the diverted water in ponds in an off-stream area. These activities will require authorisation by a consent or a permitted activity rule. The diversion of water at the site would relate to 3.6.4.13 *Discretionary Activity Rule – Stopbanks, Diversions and any Associated Discharges of Water*. Damming water would relate to either 3.6.4.4 *Permitted Activity Rule – Small Dams and Damming Water*, or 3.6.4.9 *Controlled Activity Rule – Offstream Damming and Damming Ephemeral Streams and Damming of Artificial Watercourses*, or 3.6.4.14 *Discretionary Activity Rule – New Dams/Damming of Water*.

Daylighted groundwater in an excavation is surface water in terms of the WRP. The relevant rule for such a water take is *3.3.4.26 Non-Complying Activity Rule – Water Takes*. The associated diversions relate to *3.6.4.13 Discretionary Activity Rule – Stopbanks, Diversions and any Associated Discharges of Water*.

Taking groundwater via production bore(s) will require consent for the proposed volumes; the relevant rule *3.3.4.24 Discretionary Activity Rule – Groundwater Takes*.

The Resource Management (Measurement and Reporting of Water Takes) Regulations 2010 will apply to taking groundwater via a bore or bores. They may also apply for the taking of surface water for irrigation, dewatering and dust management purposes, depending on the take rate.

The site is located within the Hamilton Basin – South groundwater management level area. Given the current allocation level for this management level area, it is likely that there is ample allocation available to provide for a groundwater volumes proposed. The groundwater that would be tapped is ultimately hydraulically connected to the mainstem Waikato River and thus needs to be accounted for in the WRC surface water allocation system.

Public Transport

The proposal introduces significant transport demand within a rural road environment, reliant on local roads (Pencarrow, Hooker, and Duncan Roads).

The Integrated Transport Assessment (ITA) identifies substantial traffic generation, particularly during peak event conditions (up to 6,000 attendees and 1,500–1,800 vph). However, there is limited evidence to demonstrate that the surrounding network can accommodate this demand under peak conditions, particularly given existing constraints (LOS E–F at key intersections).

The ITA appropriately differentiates between race day/event traffic (high, peak-based), training traffic (regular, early morning), and residential traffic (steady, low volume). However, the interaction between these traffic types is not fully explored, particularly in terms of cumulative effects.

Key transport considerations (including gaps identified):

- Heavy and horse-related vehicles (e.g. horse floats, trucks, service vehicles) are acknowledged; however, their operational and safety implications on the rural network are not yet fully assessed.
- The proposal includes multiple access points, allowing separation of traffic types; however, the effectiveness of this hierarchy in managing mixed traffic (general, heavy, equestrian) remains uncertain.
- The assessment relies heavily on EMP/ETMP/CTMP, which remain conceptual, with limited detail on delivery, monitoring, or performance under peak demand.
- The site is highly car-dependent, with limited integration with public transport (PT).
- It is unclear how transport demand differs between general spectators and racing participants (who are likely to travel with equipment or horses).
- While park-and-ride or shuttle systems are referenced, no detailed assessment is provided on their feasibility, scale, or likely uptake.

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- The development includes around 67 residential lots (including retirement/lifestyle). However, there is no clear assessment of likely PT uptake, no detailed consideration of future PT provision, and no clarity on alignment with planned PT network expansion.

It is noted that WRC currently has no plans to provide public transport services in this area. However, consideration is encouraged for the provision of future public transport infrastructure, including bus access, turning space, and potential bus stop locations, in line with the Regional Public Transport Plan (RPTP) and national guidance.

Policy alignment: the proposal shows limited alignment with Regional Land Transport Plan (RLTP) and RPTP objectives, particularly due to its rural location, high car dependency, and limited support for mode shift.

Opportunities for improvement: from a transport planning perspective, there may be an opportunity to improve outcomes through demand management approaches, such as a park-and-ride system centred in Cambridge, supported by shuttle services.

This could reduce direct private vehicle trips to the site and help manage peak event traffic, particularly given the constrained rural network. However, this approach would require further feasibility assessment and clear commitment, which is currently not provided.

Overall, a robust transport assessment is required at the substantive stage to demonstrate that effects can be effectively managed without significant intervention.

Earthworks

WRC notes the necessary earthworks will be carried out in accordance with best practice and undertaken with appropriate erosion and sediment control measures to ensure potential adverse effects are avoided or minimised.

The indicative volumes of earthworks include 370,000 m³ of cut and 300,000 m³ of fill, with an additional 300,000 m³ of cut across the site for the removal of topsoil. The infilling of the existing farm drainage system will require an estimated 40,000 m³ of fill.

WRC supports the proposal to undertake earthworks during the summer earthworks season to reduce the potential for the discharge of sediment into receiving waters. We also note the earthworks will be undertaken in accordance with a detailed Erosion and Sediment Control Plan to minimise any effects beyond the site boundary.

Potential HAIL Sites

The PSI identifies a number of HAIL activities across the site, including agrichemical storage and use, fuel storage, treated timber storage, a farm dump, offal pits, and a burn area. These are considered consistent with the site's historical use. While a limited soil sampling programme has been undertaken, it appears to have primarily targeted general site conditions rather than areas associated with identified HAIL activities. As such, there is insufficient information at this stage to characterise the nature and extent of potential contamination associated with these areas.

WRC supports the preparation of a Contaminated Site Management Plan (CSMP) as part of any substantive application. This should include targeted investigation of identified HAIL areas to define the extent of contamination and inform appropriate management and remediation measures prior to earthworks.

Overall, the approach is considered appropriate for this stage; however, further investigation will be required to adequately address potential contamination risks.

Waikato Regional Plan

The proposed development will trigger a variety of activities under the Waikato Regional Plan (WRP) that will require several associated resource consents. The applicant has undertaken discussions with WRC to identify the activities that will require resource consent under the WRP, and these rules are listed below.

Water

- 3.3.4.24: Groundwater take – from proposed bore(s)
- 3.3.4.21/3.3.4.23/3.3.4.26: Surface water take – if a pond is created (stormwater or other) then the use of this for irrigation may become a surface water take
- 3.8.4.7: Drilling – to drill below the water table for ground water take
- 3.3.4.26/3.6.4.13: Dam and divert for dewatering during construction (any surface water pooling in construction trenches)
- 3.3.4.24: Groundwater take by spears if needed to extract groundwater for construction activities

Water diversion – artificial watercourses

- 3.6.4.13, 3.6.4.9, 3.6.4.13: Surface water damming and diversion (drains)

Wastewater discharges

- 3.5.7.7: On-site domestic wastewater discharge

Earthworks and cleanfill discharge

- 5.1.4.14: Bulk Earthworks
- 5.2.5.5: Cleanfill discharge to land over 2,500 m³

Post development stormwater discharge (trafficked areas)

- 3.5.11.8: Stormwater discharge

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Overall, WRC considers that the proposal for the racecourse and its associated activities provides some strategic benefits with the combination of three racecourses into one single operation at a greenfields site. Whilst consents for the proposal will require resource consents under the RMA, based on the information WRC staff have reviewed to date, the issues with these will likely be able to

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be addressed through consent conditions. However, WRC considers that the rationale for the associated retirement village, residential and commercial components is not well documented and therefore further information, so as to more accurately enable an assessment of these parts of the development with the relevant statutory instruments, is requested within the substantive application.

Managers signoff

A handwritten signature in black ink, appearing to read 'AM d'Aubert', written in a cursive style.

AnaMaria d'Aubert
Manager – Regional Consents

3 June 2026

Your written comments on a project under the Fast Track Approvals Act 2024

| | |
|---------------------|--|
| Project name | Waikato Thoroughbred Racing Greenfield Racing Club |
|---------------------|--|

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

| 1. Contact Details | | | |
|--|-----------------------------------|--------------------|-----------|
| Please ensure that you have authority to comment on the application on behalf of those named on this form. | | | |
| Organisation name (if relevant) | Waipā District Council | | |
| *First name | Wendy | | |
| *Last name | Robinson | | |
| Postal address | Private Bag 2402, Te Awamutu 3840 | | |
| *Contact phone number | s 9(2)(a) | Alternative | s 9(2)(a) |
| *Email | s 9(2)(a) | | |

| 2. Please provide your comments on this application |
|--|
| <p>Waipā District Council (Council) appreciates the opportunity to provide comments on this application for referral under the Fast-track Approvals Act 2024 (the Act). Comments have been provided in accordance with s17 of the Act and seek to support the Minister’s decision-making under s22 of the Act.</p> <p>Strategic benefits</p> <p>Council acknowledges that the proposal will release 110 hectares of land for residential purposes in both Cambridge (76 hectares) and Te Awamutu (34 hectares) through the development of thoroughbred and harness racing facilities.</p> <ul style="list-style-type: none"> ▪ The Cambridge Raceway harness track (15ha) is already zoned Medium Density Residential Zone, and the Cambridge Jockey Club (61 ha) is zoned deferred residential and forms parts of a growth cell that is expected to be available for a mixture of residential and large lot residential development beyond 2035. ▪ The Waipā Racecourse (34 ha) in Te Awamutu is live-zoned Medium Density Residential. ▪ Council recognises that the release of this land means that projected residential development sufficiency in both Cambridge and Te Awamutu is now more likely to be |

2. Please provide your comments on this application

realised. This will reduce the potential for new greenfield land on highly productive soils to be needed to meet long term demand for housing.

Council agrees that the racecourse and its associated racing activities provide some strategic benefits as well as potential economic opportunities. Racing activities are also considered well suited to the rural environment.

Council consider that it would be more appropriate for the residential lifestyle and retirement living matters of the proposal to be addressed under the RMA.

- Allowing rural residential development on Highly Productive Land in such circumstances undermines strategic growth planning and diverts resources away from efficiently serviced urban locations.
- The impacts from these activities cannot be justified where existing zoned land already provides sufficient residential development capacity.

Rural-residential development

Further intensified residential development of this rural environment does not align with The Future Proof Strategy, the Waikato Regional Policy Statement (particularly Change 1), and the accessibility requirements for a “well-functioning urban environment” as defined by the National Policy Statement on Urban Development 2020. This is exacerbated by the proposed development of a retirement village, potentially resulting in reliance on nearby urban centres (Cambridge) for essential services.

Rural residential development on Highly Productive Land results in the permanent loss and fragmentation of regionally significant soils and imposes inefficient infrastructure and servicing costs on councils. Low-density rural subdivision requires disproportionate investment in roading, stormwater, community facilities, open spaces, and emergency response, with high ongoing maintenance costs.

These impacts cannot be justified where existing zoned land already provides sufficient residential development capacity. Allowing rural residential development on HPL in such circumstances undermines strategic growth planning and diverts resources away from efficiently serviced urban locations.

Retirement living

Future Proof has recently undertaken a review of retirement living options in the Future Proof area – the report can be viewed on the Future Proof website here: [Future Proof Retirement Living Report - Core Share](#) It concludes “that there is no justified exemption for retirement village activities in rural areas” and that “Retirement housing should be close to services particularly health and public transport”.

2. Please provide your comments on this application

The analysis of this report shows that there are currently 21 retirement living options in Waipā district, including 11 independent living villages. The largest surplus of retirement living supply across the Future Proof sub-region is in Waipā District. Current (and in progress) supply is projected to be sufficient to meet demand until around 2040 under all scenarios, and even longer if growth and/or penetration is less than the high scenario.

Housing demand within Waipā

Council assumes Waipā's residential growth to be primarily focused in the main urban areas of Cambridge, Te Awamutu and Kihikihi, where growth can be supported by infrastructure and services and communities can function well.

Following recent economic assessments, growth is assumed to occur within existing urban areas and planned growth areas, including both infill and planned greenfield development, with no new urban growth areas required.

The consolidation of racing activities at Cambridge and Te Awamutu sites enables existing racecourse sites to be vacated and redeveloped – representing a potential further contribution to the housing supply in Waipā district. This will reduce the potential for new greenfield land on highly productive soils to be needed to meet long term demand for housing.

Growth in rural areas and smaller towns and villages is expected to be limited and managed, reflecting infrastructure constraints, rural character, and land use considerations.

Council has concerns that the residential components of this proposal will adversely impact the investment made into growth in existing enabled areas that are nearby.

Transportation

This proposal has activities anticipated to operate over the long term and introduce additional, particularly heavy vehicle, movements to the local road network. Upgrades to Hooker Road and Racecourse Road intersections with Cambridge Road should be considered as part of the substantive application.

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2. Please provide your comments on this application

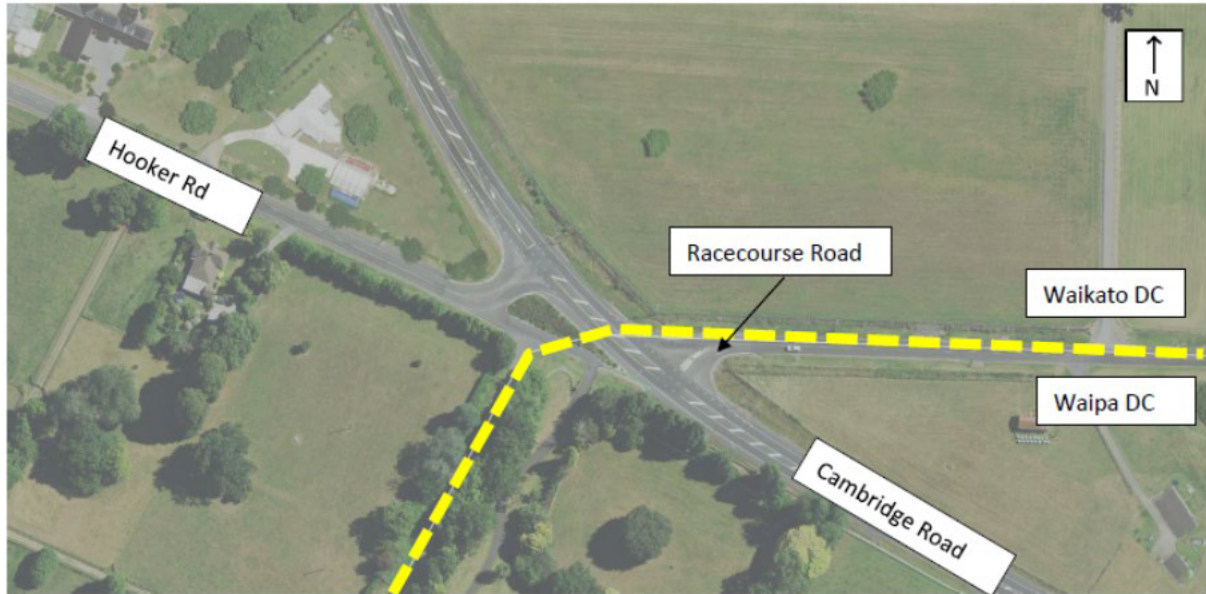


Figure 1: Existing intersection with District Boundary shown dashed yellow

Summary

There are strategic benefits of the racing activities by making available for development the residential zoned land occupied by the existing racing facilities in Te Awamutu and Cambridge.

The residential lifestyle and retirement living activities in a rural area are at odds with Council's strategic plans and are not considered to be regionally or nationally significant.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

Wayne Allan

GROUP MANAGER DISTRICT GROWTH & REGULATORY SERVICES

Date: 3 June 2026

