Memorandum

To: Ministry for the Environment (MfE)

From: Briar Belgrave and Fraser McNutt – Barker & Associates Limited

Date: 29 July 2026

Re: Planning Memorandum for **Stillhaven**

1.0 Introduction

1.1 Overview

Stillhaven Limited, as the applicant, engaged Barker & Associates (**B&A**) to provide planning services for the master planning, consenting and design of **Stillhaven** (the **Project**). The Project is located approximately 15km to the north-west of Hamilton City Centre and comprises a total of 104 hectares. Stillhaven is an urban development consisting of residential, retirement village, and supporting commercial and community activities that will form an extension of the existing Te Kowhai township.

Key components of the Project include:

- Approximately 700 residential dwellings ranging in density from Large Lot Residential, General Residential, and Medium Density Residential. The ratio of density may be adjusted as part of detailed design undertaken for a substantive application should the Project be successfully referred;
- A retirement village of approximately 11 hectares located adjacent to Te Kowhai Road that will accommodate approximately 200 retirement units with additional supporting facilities including 40-50 aged care beds;
- Two commercial nodes totalling approximately 5,000m^2 providing approximately 1,500m^2 commercial floor space, providing for local services and amenities to support the development and surrounding community;
- Public open space including stormwater reserves providing for recreation, amenity, stormwater management infrastructure, and ecological outcomes. These stormwater reserves form part of an integrated stormwater and flood management strategy to reduce flood risk within the site and across the wider catchment; and
- Associated infrastructure including upgrades and new transport, stormwater, wastewater, water supply, electricity and telecommunications infrastructure.

The conceptual Masterplan for Stillhaven is shown in **Figure 1** below.

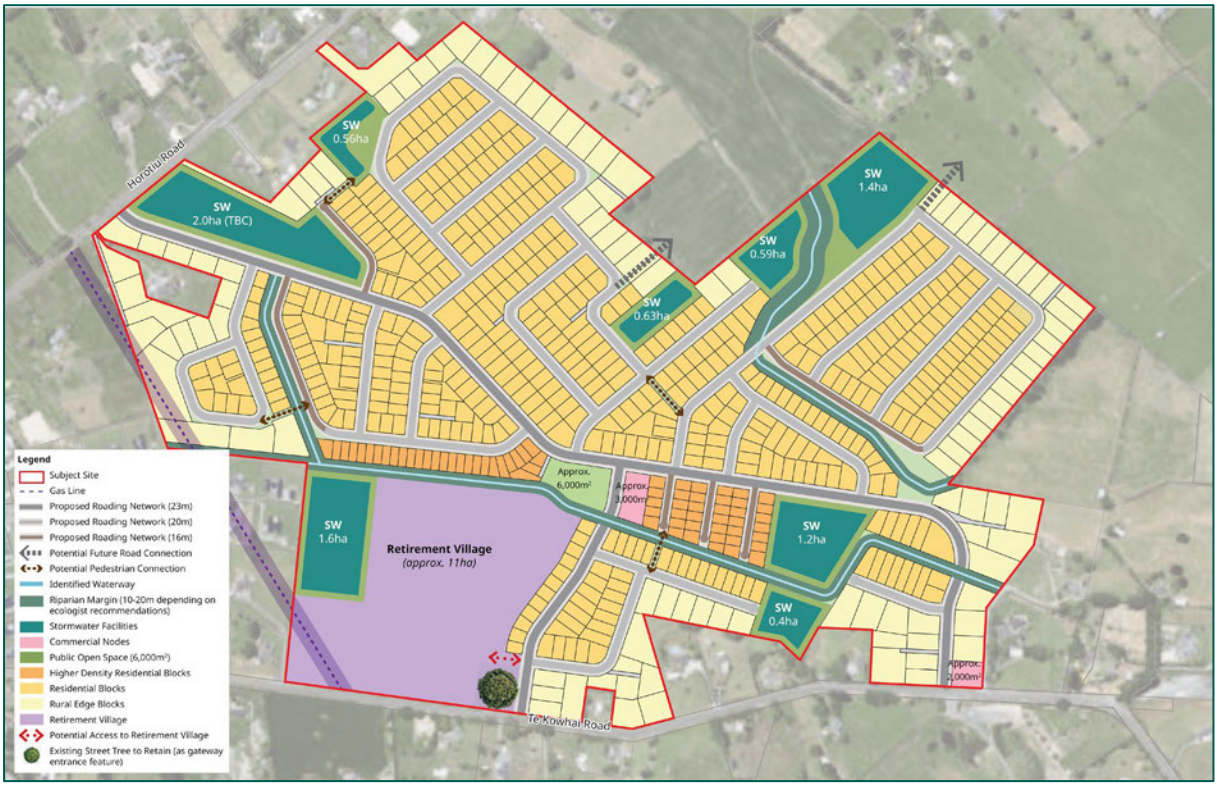


Figure 1: Conceptual Masterplan Layout. Source: Urban Design Memo (B&A)

Stillhaven will be delivered through a carefully planned stages approach to align closely with infrastructure provision, and in particular stormwater and transport infrastructure. Stillhaven will consist of 8 stages. Each stage will deliver land use or superlots with the required infrastructure and amenity facilities to ensure steady market absorption and continuity in development delivery. Apart from Stage 1 occurring first, the subsequent stages may be delivered in any order in response to market demand. The stage boundaries will be confirmed through the substantive application process subject to detailed technical assessments, infrastructure investigations, and further design refinement.

1.2 Benefits of the Project

It is considered that the Project will deliver significant regional benefits, including but not limited to:

- Stillhaven will boost the supply of housing which will help reduce the identified shortfalls in the Waikato in the short, medium, and long term. Adequate housing supply assists the market to be more responsive to growth in demand, thereby reducing the rate at which house prices grow over time (relative to the status quo)
- The Project caters to a variety of needs and preferences by providing for a range of dwelling typologies, including retirement living, standalone homes of various sizes and configurations, as well as medium density housing.
- Enabling approximately 1,500m^2 of commercial floorspace, Stillhaven will help keep pace with demand over time, and provide for local services, amenities, and employment for the development and the existing township of Te Kowhai.

- The integrated stormwater management strategy will deliver flood management benefits beyond the extent of the site through naturalised stormwater treatment systems, enhanced drainage corridors, and associated downstream mitigation works where required. The system will attenuate runoff, improve water quality, and assist in alleviating existing flooding experienced by neighbouring properties and providing long-term resilience for the surrounding Te Kowhai catchment.
- One-off economic impacts through the construction of hundreds of new homes, commercial amenities, and infrastructure, along with employment through the construction period.
- The Project enables the land to be put to its highest and best use, which is a precondition for economic efficiency to hold in the underlying land market.
- Through engagement with Waikato District Council and IAWAI on water supply and wastewater, the Applicant is providing financial contribution to a spatially strategic infrastructure solution that will benefit the local area.

1.3 Site Description

The site is of irregular shape and is approximately 104ha in size. Located to the north-east of Te Kowhai village, the site is well-connected to surrounding towns and employment centres within the Waikato catchment, including Hamilton City located approximately 15.6km to the southeast.

The site is bound by existing rural-residential properties to the southwest, with further rural-residential properties located along the Te Kowhai Road and Horotiu Road frontages. The remaining northern and eastern boundaries adjoin rural land. The site is relatively flat and is currently in use for rural purposes.

There are existing hydrological features across the site, including existing farm drains and a natural watercourse. Farm drains traverse the site from west to east, with the natural watercourse located in the north-eastern corner of the site and connecting to the northernmost farm drain within the site, as shown in Figure 2 below. A potential wetland is located within the southern portion of the site near Te Kowhai Road. The natural watercourse and wetland will be investigated further to confirm their ecological status and condition.



Figure 2: LINZ recorded river features, drains and natural streams. Source: EcoResto

1.4 Records of Title and Interests

The site consists of five titles as identified in **Table 1** below.

Table 1: Records of Title

Legal Description and Address	Area (Hectares)	Landowner
Lot 3 Deposited Plan 361630	21.54	Sandra Maree Keefe, Deborah Pearl Reardon, Edward Arthur Smith, Gladys Faye Smith
Lot 3 Deposited Plan 466665	40.12	Aaron Shane Bassi and Donna Kay Bassi
Lot 1 Deposited Plan South Auckland 82042	17.43	Nicholas John Hall and Pauline Kaye Hendrikse
Lot 3 Deposited Plan 349516	7.42	Antonia Gardiner Wilson, Paul Lyle Gardiner, J W Trustees No.12 Limited, J W Trustees No.14 Limited
Lot 2 Deposited Plan 466110	17.6	Kevin Ashley Booth, Colin Raymond Dixon, and Jacqueline Jean Dixon

The Records of Title for the site are subject to a number of interests (refer **Attachment 1**). A summary of these interests and their relevance to the project are provided in **Attachment 2**. Overall, there are no interests which will prevent the proposed works from being undertaken.

For completeness, letters from landowners are provided within **Attachment 3**, confirming intent to enter into agreements with Unity Management Limited, who will in turn nominate all land contracts to Stillhaven Limited as purchaser as confirmed in **Attachment 4**. Stillhaven Limited is the sole developer and applicant.

1.5 Planning Context

The site is zoned Rural under the Waikato Operative District Plan (**WODP**) and General Rural Zone under the Waikato Proposed District Plan – Operative in Part (**WDP-OP**).

A gas line traverses the western edge of the site, as shown in **Figure 3** below. No other planning controls or overlays are located over the site under the WODP and WDP-OP and Waikato Regional Plan (**WRP**).

The zoning pattern of the site and surrounding environment is illustrated in **Figure 3**. The adjacent land to the north, east, and south predominantly carries the same zoning as the site. The residential area to the west is zoned Country Living under the WODP, and Large Lot Residential under the WDP-OP. There is additionally an area of Future Urban Zone to the south of the site under the WDP-OP, illustrated as the area shaded grey in **Figure 3** below.

A gas main traverses a small portion of the site to the west, illustrated as by the grey line running north-south on Figure 2 below. The implications of this are discussed further in **Attachment 2.**

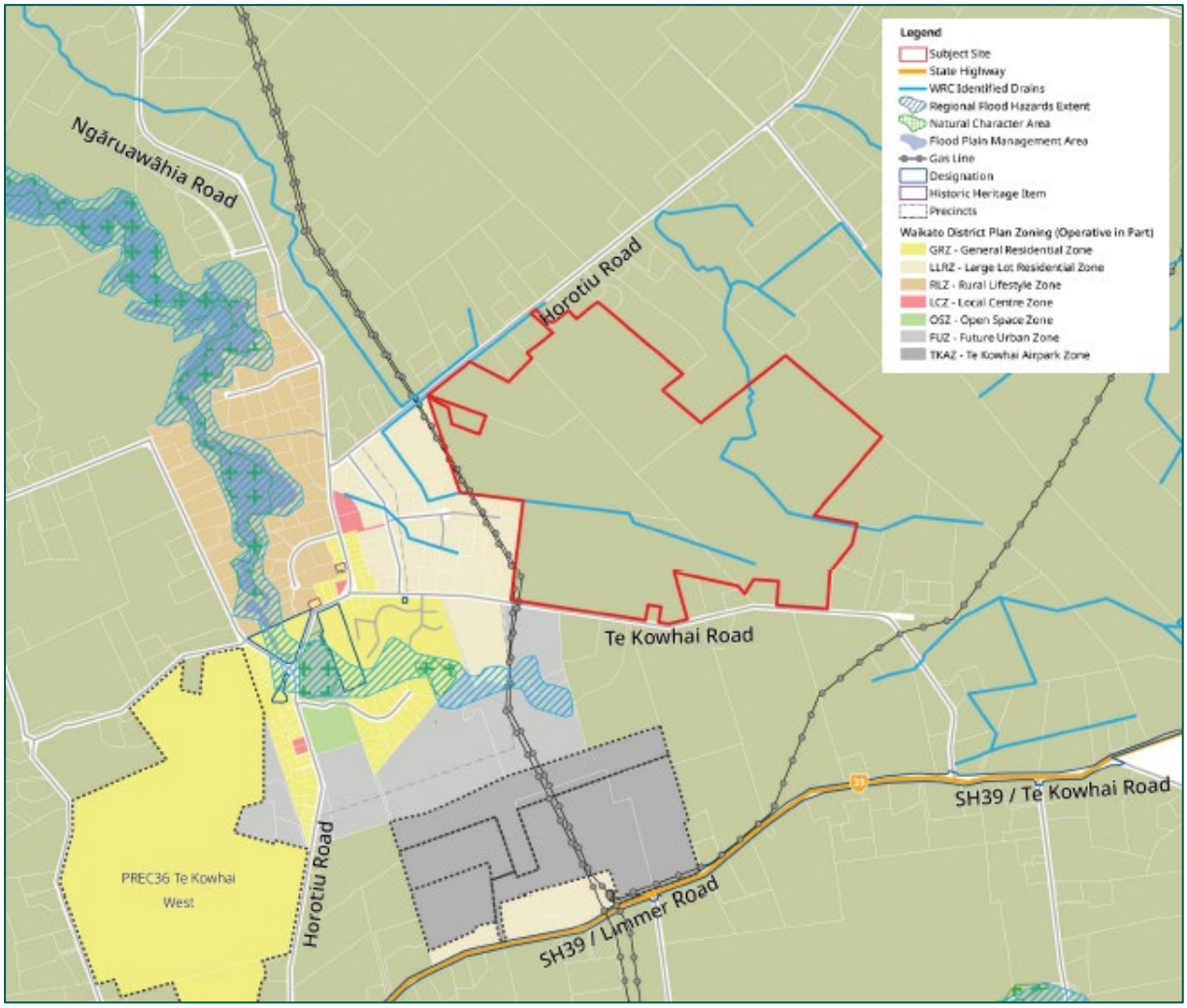


Figure 3: Surrounding zoning under the WDP-OP and overlays.

1.6 Strategic Context

Stillhaven is strategically located within the Waikato Region, with direct access from Te Kowhai Road, a primary collector route connecting to Hamilton via SH39. The site is conveniently located in relation to the Te Kowhai township and provides strong connectivity to surrounding rural communities and major urban centres across the Waikato. This accessibility will support future residents and visitors by providing convenient access to employment opportunities, services, and recreational activities throughout the region.

The site is located outside of Future Proof growth areas; however, future growth areas are considered to benefit the site due to their proximity. Notably, the Horotiu future industrial growth cell to the north-east of the site will provide future employment opportunities and will be located approximately 4km away along Horotiu Road. Additionally, Rotokauri Stage 2 will be located approximately 3km away to the east along Te Kowhai Road / SH39. Rotokauri Stage 2 integrates housing and employment with upgraded three-waters infrastructure, multimodal transport corridors, and ecological reserves to handle anticipated significant population growth within this growth cell. The site is well-located strategically to these future growth areas which are anticipated to provide additional employment and services.

Further, the site is located approximately 10km along Te Kowhai Road / SH39 to the SH1C interchange, providing access to a major state highway and positioning the site to leverage regional growth, planned infrastructure upgrades, and emerging public transport services.

1.7 Regional Significance of the Project

The Fast-track Approvals Act 2024 (**FTAA**) has established a framework that differs from the Resource Management Act 1991. We acknowledge that the matters outlined in Sections 22(1)(a) and 22(2)(a) of the Fast Track Approvals Act direct the considerations available to the Minister when assessing a project's eligibility for referral.

In summary, Stillhaven is a development project that will create significant economic benefits and address housing needs in terms of supply, type, and price at a scale that will provide significant regional benefits. Stillhaven will enable approximately 700 residential lots with varying site sizes (~300m^2–~1,250m^2), a retirement village comprising approximately 200 independent living villa units and 40-50 integrated care facility suites, alongside supporting care facilities and amenities, directly addressing identified housing shortfalls within the Waikato Region. Furthermore, Stillhaven is generally consistent with the relevant strategic outcomes identified in local and regional planning documents.

We respond to the relevant Section 22(2)(a) considerations for Stillhaven below.

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

While the Project is not explicitly listed as a priority in a central government, local government, or sector plan or strategy, it fits well within the strategic intent and lens of the urgent need to increase housing supply in the Waikato Region. In this regard, the Project aligns with the FTAA purpose of accelerating projects that deliver significant regional benefits, as set out below.

Section 22(2)(a)(iii) – will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020):

Stillhaven will enable the delivery of approximately 700 households across a range of lot sizes and typologies (from approximately 300m^2 to 1,250m^2, including conventional suburban lots of 400-800m^2 and larger rural-edge lots of around 1,250m^2), together with a retirement village comprising approximately 200 independent living units and 30-50 aged care beds, alongside supporting facilities, amenities, and neighbourhood commercial centre. This diversity of housing type will help improve the efficiency of the Waikato housing market, particularly be enabling older residents to transition into purpose-built, age-appropriate accommodation.

As set out in the Economic Memorandum prepared by Market Economics and included at **Attachment 5**, the Project will make a significant contribution toward increasing housing supply and addressing identified housings needs within Waikato District. The 2023 Housing and Business Capacity Assessment (**HBA**) identifies material long-term shortfalls in housing capacity, with Hamilton City projected to face shortfalls of between approximately 4,800 and 15,900 dwellings and the Waikato District projected to experience the fastest rate of urban growth in the Future Proof area, with urban dwelling demand more than doubling (105%) over the long term. Updated Statistics NZ population projections indicate this demand is likely to be even greater than assumed in the HBA. Against this backdrop, Stillhaven's delivery of approximately 700 dwellings, together with the retirement village component, represents a material increase in serviced greenfield dwelling capacity that will help narrow the gap between future housing supply and demand within the lower Waikato housing market, complementing rather than displacing growth planned elsewhere in the wider urban area.

The proposal will also improve housing market efficiency by providing a local downsizing option for older residents through the delivery of a purpose-built retirement village integrated with care facilities and support services. Market Economics concludes that the retirement village will create opportunities for existing residents to transition into age-appropriate housing within their local community, supporting greater turnover in the wider housing market and increasing the availability of existing family housing stock for younger households. The economic assessment further notes that this component will meet growing demand for retirement living in the district while supporting ageing in place within the Te Kowhai community.

The proposal responds directly to the diverse housing needs and preferences anticipated by Policy 1 of the National Policy Statement on Urban Development 2020 (**NPS-UD**). The proposal delivers a range of housing typologies and living arrangements, including conventional and larger rural-edge residential lots, retirement villas and aged care suites, within a comprehensively master-planned environment. The integrated retirement living and care model will provide secure, accessible and low-maintenance accommodation options for older residents, supported by on-site services and communal facilities. This diversity of housing and support services contributes positively toward a well-functioning urban environment by increasing housing choice and enabling residents to remain connected to their communities as their needs change over time.

In addition to the above, Stillhaven will contribute to achieving a well-functioning urban environment. The relevant matters under Policy 1 of the NPS-UD are assessed in **Section 3.2** below.

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

The Economic Assessment sets out the economic benefits that will be delivered by Stillhaven. In summary these include:

- A total GDP impact (direct, indirect and induced) of between $135.9 million and $173.0 million, depending on the discount rate applied (2% or 8% per Treasury guidance), with the direct and indirect impact alone estimated at $94.7 million to $120.7 million;
- The generation of full-time equivalent employment (measured as Modified Employee Counts, or MEC-years) totalling 1,344 MEC-years on a direct and indirect basis, rising to 1,816 MEC-years once induced (household spending) effects are included, split across the two development components:
    - Residential component: direct and indirect GDP impact of $77.3 million to $102.7 million, with peak direct and indirect employment of 155 MECs (210 MEC including induced effects);
    - Retirement village component: direct and indirect GDP impact of $17.4 million to $17.9 million, with peak direct and indirect employment of 105 MECs (142 MEC including induced effects);
- Separately, construction of the individual dwellings themselves (in addition to the land development and infrastructure capex above) is estimated to generate a further $420.3 million in direct and indirect GDP ($578.1 million including induced effects), $221.9 million in direct and indirect household income ($285.4 million including induced effects), and support 4,610 direct and indirect jobs (MECs), rising to 5,896 MECs including induced effects;
- Direct and indirect income returned to households is estimated at $55.4 million to $70.6 million, rising to $72.3 million to $92.1 million once induced effects are included;
- Once fully operational, the development is expected to generate at least $49 million in annual household expenditure, including approximately $23 million in annual retail spend, supporting local businesses, services and the existing Te Kowhai township, alongside an expanded Waikato District Council rating base to help fund local infrastructure and community assets;
- The Project will respond to demand for retirement living and aged care in the Waikato District by integrating approximately 200 independent living units and 40–50 aged care beds within the development, supporting ageing in place and improving access to local retirement and care options;
- The Project's integrated mix of residential, retirement living and neighbourhood commercial activity will strengthen the customer base and viability of the existing Te Kowhai town centre and local services, while reducing the need for day-to-day travel to Hamilton and Te Rapa; and
- The Project will enable the land to be put to a higher economic use than its current dairy farming activity — a precondition for economic efficiency to hold in the underlying land market. The Economic Assessment quantifies the opportunity cost of forgone dairy farming at $12.9 million to $26.1 million (total impact) over a 35-year period, substantially lower than the GDP impact of the proposed development, with the associated milk supply loss estimated at approximately 0.02% of the Waikato's milk solids.

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

Stillhaven aims to minimise greenhouse gas emissions where possible through construction and within the masterplan design.

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

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

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

- Multi-modal transport corridors that prioritise pedestrians and cyclists and encourages active modes of transport;
- Enabling intensified urban development, including provision for services and amenities within the new neighbourhood centre to reduce the need for vehicle travel;
- Connectivity to existing centres within the vicinity, including:
    - Hamilton City Centre – approximately 20 minutes;
    - Hamilton (Te Rapa) – approximately 15 minutes; and
    - Ngāruawahia – approximately 10 minutes.

Overall, the Project will contribute to efforts to mitigate climate change and reduce net emissions of greenhouse gases.

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

Overall, Stillhaven is consistent with the relevant local and regional planning documents, as set out in **Sections 3.11 to 3.16** below.

1.8 Benefit of the Fast-Track Approvals Act (2024) for Stillhaven

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

As outlined in **Section 2.0** below, Stillhaven requires a range of resource consents from Waikato District Council and Waikato Regional Council, and a specific approval under the Wildlife Act 193 for an Authority. The ability to apply for a comprehensive range of consenting requirements within one application, to be considered by one panel, offers significant efficiencies in planning and specialist inputs into managing and navigating the consenting process. The overall intent of the FTAA, which is designed for regionally and national significant infrastructure and development projects, supports the scale and significance of Stillhaven. The consolidated timeframes for engagement with interested stakeholders and parties, wider consultation requirements to support substantive applications, and the overall detail required support a more timely and efficient consideration of the project.

Outside of the FTAA (2024) process, it would be anticipated that Stillhaven would not be able to obtain resource consent for subdivision as a Prohibited Activity, and other aspects would be subject to a challenging and complex consenting requirement that would test the current District Plan provisions. Our understanding of the FTAA legislation is to support regionally and nationally significant projects with a single consenting process. This would enable development commencing sooner and the economic, social

and wider positive benefits to be realised sooner. The FTAA process is considered the right instrument for this scale of project, and The Rest project is not considered to materially impact on the intent or efficient operation of the FTAA process, more so it would reinforce the value and opportunity that the FTAA (2024) presents for regionally and nationally significant projects.

2.0 Reasons for Consent

2.1 Waikato District Plan

At this preliminary stage, we have identified that the Project may trigger resource consent under the WODP for the following reasons:

Chapter 25 – Rural Zone

- Activities which do not comply with permitted activity standards will require consent as a **restricted discretionary activity** under Rule 25.10.2
- The Project will likely result in more than 200 vehicle movements per day and is a **discretionary activity** under Rule 25.16.2
- Earthworks are considered unlikely to comply with permitted activity standards, and will require consent as a **restricted discretionary activity** under Rule 25.25.2
- Filling on the site using imported may be required for enabling site works that are likely to exceed applicable volumes, and consent may be required as a **discretionary activity** under Rule 25.27.2
- The Project will not comply with permitted activity standards for number of dwellings, and will require consent as a **discretionary activity** under Rule 25.46.2
- Proposed lots will not comply with the net site area requirements, and consent will likely be required as a **restricted discretionary activity** under Rule 25.48.2
- Buildings are unlikely to comply with the daylight admission and building coverage for the Rural Zone, and will require consent as a **restricted discretionary activity** under Rule 25.50.2 and as a **discretionary activity** under Rule 25.51.2
- The Project includes commercial buildings across two neighbourhood centres that may not comply with permitted activity standards, and consent may be required as a **discretionary activity** under Rule 25.52.2
- Buildings are unlikely to comply with setback controls and will likely require consent as **discretionary and/or non-complying activities** under Rules 25.53.2, 25.54.2, 25.55.2, and 25.56.2
- The Project will result in subdivision that creates more than one additional title per Lot and will not meet minimum allotment size or relevant shape factors and is likely to require consent as a **non-complying activity** under Rule 25.70A.2, 25.74.2, and 25.77.3
- Lots may be unable to meet relevant frontage and road access standards and may require consent as a **discretionary activity** under Rule 25.75 and 25.76

Waikato District Plan – Operative in Part

- **AINF – All Infrastructure:**

- The Project involves the construction of new infrastructure that may not meet permitted activity standards through construction, including for earthworks, and consent may be required as a **restricted discretionary activity** under Rule AINF-R1.2 and AINF-R8.2

- **TRTP – Transport:**
  - It is possible that vehicle access, parking, and vehicle manoeuvring for some Lots may not meet permitted activity standards, and consent may be required as a **restricted discretionary activity** under Rule TRTP-R1(2), TRTP-R2(2), and TRTP-R3(2)
  - New public roads are proposed, and details will be confirmed at a later stage, however for completeness may require consent as a **restricted discretionary activity** under Rule TRTP-R6(2)
- **WWS – Water, wastewater and stormwater**
  - The Project will be serviced by a new stormwater, water, and wastewater system which may require consents as a **restricted discretionary** or **discretionary activity** under this Chapter.
- **SUB – Subdivision**
  - The Project will involve the subdivision of high-class soils and will likely require consent as a **prohibited activity** under SUB-R41
  - The proposed Lots will not meet minimum area requirements under SUB-R43.1 and road frontage requirements under SUB-R52 and will likely require consent as a **non-complying activity** under SUB-R43(2) and as a **discretionary activity** under SUB-R52(2)
- **EW – Earthworks**
  - Earthworks will be required across the Site which are unlikely to comply with permitted activity standards, and will require consent as a **restricted discretionary activity** under this chapter
- **GRUZ – General Rural Zone**
  - Two commercial areas are proposed within the Site, and will likely require consent as a **non-complying activity** under GRUZ-R60
  - The Project includes a Retirement Village which is not a specifically listed activity under the GRUZ chapter, and will likely require consent as a **non-complying activity** under GRUZ-R61
  - The Project will not comply with permitted activity standards for number of dwellings, and will require consent as a **non-complying activity** under GRUZ-S1(3)
  - The proposed buildings are unlikely to comply with height in relation to boundary, building coverage, and setback controls, and will likely require consent as a **restricted discretionary activity** under GRUZ-S8(2), GRUZ-S9(2) and GRUZ-S12(2)

Overall Activity Status

Overall, it is anticipated that the Project will require consent as a **prohibited activity** under the WODP and WDP-OP, and a s9 Land Use Consent and a s11 Subdivision Consent.

2.2 Waikato Regional Plan

Resource consent may also be required under the following chapters of the Waikato Regional Plan:

3 Water Module

- Consent may be required under this module for water takes, efficient use of water, discharges, damming and diverting, work within wetlands, and drilling below the water table. Consent is likely to be required as a **restricted discretionary** or **discretionary activity** under this module.

4 River and Lake Bed Module

- Consent may be required under this module depending on the classification of the natural watercourse within the site, for the management and/or disturbance of riverbeds. Consent is likely to be required as a **restricted discretionary** or **discretionary activity** under this module.

5 Land and Soil Module

- Consent may be required under this module as it relates to contaminated land. Detailed Site Investigations will confirm this requirement and the activity status, however it is anticipated to be a **discretionary activity**.

Overall

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

- Section 9 and Section 13 Land Use Consents;
- Section 14 Water Permit; and
- Section 15 Discharge Permit.

2.3 National Environmental Standards

2.3.1 National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011

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

It is likely that provisions of the NES-CS will apply to development of the Site, as activities on the Hazardous Substances Activities and Industries List (**HAIL**) are likely to have historically occurred on the Site. A detailed site investigation will be undertaken at the Site in support of the substantive application. This will ascertain whether NES-CS and/or WRP contaminated land resource consents are required to be sought in support of the Project. This will likely be a controlled activity pursuant to Regulation 9 of the NES-CS.

2.3.2 National Environmental Standards for Freshwater 2020

The Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-FW) sets a nationally consistent set of planning controls on the management of freshwater.

As set out within the Ecological Memo (**Attachment 7**), there is an existing wetland on the site and it is likely that provisions of the NES-FW will apply to the site. Detailed design work to confirm if work around wetlands will require resource consent will be undertaken in preparation of a substantive application if the project is referred.

2.4 Wildlife Act Authority

Based on the Ecological Memo (**Attachment 7**), we anticipate that a Wildlife Act Authority 1953 (**WAA**) will be required from the Department of Conservation (**DOC**) for the salvage and relocation of indigenous lizards during vegetation clearance, as well as incidental injury and death. Further specialist reporting will determine if any other approvals will be sought under the WAA. The details of the WAA approvals will be progressed with DOC as part of pre-lodgement consultation of the substantive application, and will be detailed as part of a Management Plan for a substantive application.

2.5 Complex Freshwater Fisheries Approval

Based on the Ecological memo (**Attachment 7**), it is possible that a Complex Freshwater Fisheries Approval (**CFFA**) may be required given the potential for at-risk species to be located within waterways on the site. Further specialist reporting will determine if a CFFA will be required. The details of this will be progressed with DOC as part of pre-lodgement consultation on the substantive application, and will be detailed as part of a substantive application.

2.6 Archaeological Authority

No Archaeological Authority is required under the Heritage New Zealand Pouhere Taonga Act 2014 (**HNZPTA**), notwithstanding accidental protocols and ongoing dialogue with Heritage New Zealand Pouhere Trust (**HNZPT**) and iwi and hapū (where relevant) will be undertaken as required.

3.0 Statutory Framework

Schedule 5, Clause 2(1)(a)(i) – (ii) of the FTAA requires referral applications to include an assessment of the activity against the relevant provisions and requirements of the following statutory documents:

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

These documents are assessed below. The New Zealand Coastal Policy Statement is not assessed as the Site is not adjacent to the coastal environment, and this document is therefore not relevant.

This section also addresses the extent to which the Project is consistent with local or regional planning documents, including spatial strategies in accordance with Section 22(2)(a)(x) of the FTAA.

3.1 National Policy Statement for Freshwater Management 2020

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

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

- The development of Stillhaven provides opportunities for ecological restoration of an area that has an overall low ecological value.
- Mana whenua have been consulted to this point of the Project, and ongoing engagement and consultation with iwi and hapū will continue as the Project progresses.
- The Project seeks to maintain and potentially improve the health and wellbeing of existing modified watercourses on the site and beyond, including through maximising the opportunities within the stormwater management and open space areas for future enhancements.
- The presence of any indigenous freshwater species will be confirmed through the detailed design phase if successfully referred, and the Project aims to protect existing freshwater habitats where feasible.
- Ongoing monitoring will take place to ensure the condition of water bodies and freshwater ecosystems is not degraded.

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

3.2 National Policy Statement for Urban Development 2020

The National Policy Statement for Urban Development (**NPS-UD**) came into effect on 20 August 2020 and was substantially amended in May 2022. The objectives of the NPS-UD seek to achieve well-functioning urban environments that meet the changing needs of our diverse communities. It removes overly restrictive barriers to development to allow growth 'up' and 'out' in locations that have good access to existing services and infrastructure.

In particular, the following provisions of the NPS-UD are considered relevant to the Project:

- Provide for well-functioning urban environments with a key focus on providing for social, economic, and cultural wellbeing of all people and communities, by enabling a variety of sites that are suitable for different sectors in terms of location and size and provide good accessibility for all people (Objective 1, Policy 1).
- Providing for urban environments that develop and change over time in response to the diverse and changing needs of people and communities, including future generations (Objective 4).
- Urban development is integrated with infrastructure planning and funding decisions, strategic over the medium term and long term, and responsive, particularly where proposals would supply significant development capacity (Objective 6).
- Urban environments support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change (Objective 8, Policy 1(e)).
- Tier 1 local authorities provide sufficient development capacity and set housing bottom lines to meet expected demand for housing over the short, medium, and long-term (Policy 2, Policy 7).

It is considered that the Project is consistent with the NPS-UD for the following reasons:

- Stillhaven will deliver an integrated development that includes approximately 700 residential lots ranging in density from Large Lot Residential to Medium Density Residential, and a retirement village providing approximately 200 retirement units with additional supporting facilities including 40-50 aged care beds, providing a diversity of housing types and lots sizes that are suitable for a range of people.

- The Housing and Business Capacity Assessment identifies that there are capacity shortfalls in the short-term, medium-term and long-term for Waikato, which are driven by capacity constraints within existing urban areas and the significant economic investment in infrastructure to enable greenfield capacity to be "reasonably expected to be realised". The shortfalls are in the order of 4,500 dwellings, so additional capacity is required. Stillhaven can deliver housing to respond to this shortfall in the short-term in a timely and affordable manner, and in a manner that is integrated with infrastructure planning. The Infrastructure Memorandum (refer to Appendix 8) supporting this application confirms that the development can be serviced from an infrastructure perspective.
- Stillhaven will provide for the social, economic, and cultural wellbeing of people, with two small commercial areas providing services and amenities to provide for the day-to-day needs of local residents, with the site well-located to Hamilton's central city, Whatawhata, and Ngāruawāhia.
- The proposal encourages and promotes active transport within the site through a range of walking and cycling options to housing, services, and open space.
- Stillhaven also responds to the changing nature of the region, including the Rotokauri growth cell which is anticipated to be located approximately 3km to the east of the site when complete, providing further access to employment, services, and education.
- The project takes into consideration climate change, particularly through the stormwater management provided by the stormwater basins and wetland enhancement and incorporates measures to support the reduction of greenhouse gas emissions (such as mode transport infrastructure).

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

3.3 National Policy Statement for Highly Productive Land

The National Policy Statement for Highly Productive Land 2022 (NPS-HPL) ensures the availability of New Zealand's most favourable soils for food and fibre production, now and for future generations. It is noted the NPS-HPL recently came into effect on 17 October 2022 and was amended in August 2024.

The Land Use Capability Classification Assessment (LUC Assessment) (Attachment 9) supporting this application identifies the site as predominantly 2w2 (approximately 94% of the site) and 2s1 (approximately 6% of the site). There are no Class 1 soils mapped for the Site based on the regional NZLRI mapping. Given this, the Site is considered highly productive under the NPS-HPL.

Despite the LUC2 classifications of the site, the desktop assessment provided identifies several limitations potentially impacting the overall productive capacity of the land, including:

- The dominant LUC unit on site, 2w2 (Te Rapa peaty silt loam, Organic Soil, 98.2 ha, 94.3% of the site), is constrained by its peat substrate, poor drainage and high water table. Under cultivation the soil is prone to subsidence and compaction where the peat is thicker, and to pugging in the shallower-peat phase; hydrophobicity may also occur if cultivated during dry summers. These limitations preclude cropping, horticulture and forestry, restricting productive use to pastoral grazing and feed production with active water table management. On-site assessment may identify localised areas where water table depth, persistence or ponding are severe enough to warrant reclassification of parts of this unit from LUC Class 2 to the more restrictive Class 3w or 4w; and
- The secondary unit, 2s1 (Horotiu-Te Kowhai complex, 6.0 ha, 5.7% of the site), comprises well drained Horotiu soils intergrading with poorly drained Te Kowhai (Gley) soils. The Te Kowhai component

requires mole/tile drainage and is prone to winter pugging. While the Horotiu component is versatile and would theoretically support a wider range of uses, the unit is fragmented across three small, non-contiguous areas, which is insufficient to support a viable standalone horticultural enterprise. On-site soil profile assessment may further refine the boundary between this unit and the adjoining 2w2 unit, particularly in relation to the peat/non-peat distinction, though the 2s1 area itself is not subject to the peat exclusion under the high class soils definition.

The NPS-HPL provides for urban development on highly productive land where:

- Urban rezoning or development is needed to provide sufficient development capacity to give effect to the NPS-UD;
- Not other reasonably practicable or feasible options exist to provide the required capacity in the same locality and market while achieving a well-functioning urban environment; and
- The environmental, social, cultural, and economic benefits of development outweigh the associated costs of losing the HPL.

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

Stillhaven has some alignment with the direction and policy tests set out in the NPS-HPL, including:

- Capacity and demand – Stillhaven will enable approximately 700 residential lots with varying site sizes and a retirement village with approximately 200 villa units and a 40-50 bed integrated care facility, in a timely and integrated manner. This will assist in meeting the short-term deficit in housing supply and support the objectives of the NPS-UD.
- Location and alternatives – the Site benefits from being directly accessed from Te Kowhai Road, a rural collector road that connects to SH39 with excellent connections to SH1C and Hamilton City, along with Whatawhata and Ngāruawahia. The site is well-connected to surrounding rural and settlements and the key urban centre of Hamilton. This proximity ensures future residents have good access to employment, services, and recreational activities across the region.
- Balanced outcomes – The Project incorporates stormwater treatment, riparian planting, and open space areas. Together with cultural design inputs and proximity to services, these provide environmental, social, cultural and economic benefits that are considered to outweigh the long-term costs of development on highly productive land.

Based on the assessment above, it is considered that the Project is **not inconsistent** with the NPS-HPL. On-site assessment and identification of constraints impacting the sites long term viability from a rural productivity perspective will be addressed through a substantive application if successfully referred.

3.4 National Policy Statement for Indigenous Biodiversity

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

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

- The Project commits to avoiding adverse effects where practicable, mitigating through sensitive design and management, and offsetting/compensating where residual adverse effects remain.
- The Project seeks to enhance biodiversity across the site through indigenous vegetation planting.
- There are no mapped Significant Natural Areas on the site or adjacent sites.
- Wetland areas will be avoided where practicable and where loss is unavoidable, biodiversity offsetting/compensation will be proposed.
- Management plans will be prepared through the substantive application to address any potential adverse effects on birds, lizards and bats.
- The proposed retention, naturalisation, and riparian enhancement of site watercourses, including artificial drains and watercourses, will increase freshwater and terrestrial ecological values and creation of connected ecological corridors.
- The Project will involve revegetation of riparian areas to enhance the quality of habitat for indigenous fauna throughout the catchment and wider landscape in the medium-long term and improve overall ecological resilience and integrity.
- Culverts will be designed to meet national fish passage guidelines, and fish management plans (capture/relocation) will address potential adverse effects during drain modification.

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

3.5 National Policy Statement for Natural Hazards 2025

The National Policy Statement for Natural Hazards 2025 (**NPS-NH**) applies to flooding, landslip, coastal erosion, coastal inundation, active faults, liquefaction, and tsunami natural hazards. The objective and policies of the NPS-NH seek to

Of relevance to the Project, the NPS-NH seeks to:

- Manage natural hazard risk associated with subdivision use and development to people and property using a risk-based proportionate approach, with the risk level being assessed using the NPS-NH risk matrix (Objective 1, Policy 1).
- Use a management approach to natural hazard risk associated with subdivision, use and development that is proportionate to the level of risk, and avoid subdivision, use, and development where the risk is assessed as very high (Policy 2, Policy 3).
- Ensure that any creation of or increase in natural hazard risk on other sites be avoided or mitigated using an approach that is proportionate to the level of risk (Policy 4).
- Consider the potential impacts of climate change at least 100 years into the future, and base risk assessment and decisions on the best available information, even when that information is uncertain or incomplete (Policy 5, Policy 6).

Relying on the advice provided in the Geotechnical Memo (**Attachment 10**) and Infrastructure Memo (**Attachment 8**), the Project is considered to be consistent with the objectives and policies of the NPS-NH for the following reasons:

- While the site is not identified as subject to a flood hazard overlay at a territorial or regional scale, the Preliminary Geotechnical Assessment prepared by ENGEO notes that the Council hazard mapping does

not confirm the extent of flooding for the site and surrounding land. The site is low-lying on the alluvial plain with a network of existing farm drains, and we acknowledge existing flooding issues experienced by neighbouring properties. The potential flood risk will be further investigated and responded to through the substantive application. However, it is assumed that the risk to people and property can be suitably mitigated or avoided through appropriate stormwater management.

- The Preliminary Geotechnical Assessment concludes that the site is not generally considered to be at risk of slope instability. The site is relatively flat, and the incised gully feature to the south is greater than 100m from the site, and the associated risk is considered low.
- The site is mapped regionally as having possible liquefaction risk. The Preliminary Geotechnical Assessment concludes that Piako Subgroup and Hinuera Formation soils are susceptible to liquefaction where below the groundwater table. Preliminary analysis using nearly CPT data indicates insignificant to mild damage under SLS and ILS events, with severe damage possible under ULS events. These results and indicative only, and site-specific investigation, analysis, and response will be undertaken through the substantive application, including assessment of lateral spreading adjacent to drainage features. Notwithstanding, it is considered that the liquefaction risk can be managed and mitigated appropriately.
- The scale and detail of information supplied, and management of potential risk identified, will be detailed at the substantive stage and will be proportionate to the level of risk present.
- The site is not within a coastal area and as such is not subject to coastal erosion or sea level change.
- No active or significant faulting is mapped on the site or within the surrounding Te Kowhai township. The nearest mapped active fault is the Kerepehi Fault, approximately 40km from the site, with the Wairoa Fault (60km north) and Turi Fualt (90km southwest, offshort) beyond. No significant historical earthquakes have been recorded in the immediate vicinity, and these faults are sufficiently distant that specific mitigation beyond standard liquefaction and lateral spreading analysis is not considered necessary. Seismic risk is accordingly considered low and can be further assessed during the substantive application stage.

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

3.6 National Policy Statement for Infrastructure 2025

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

3.7 National Environmental Standards for Air Quality

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

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

phase. Measures are proposed to manage potential effects in response to the air quality objectives and policies.

The management of dust and odour will be addressed through the substantive application in a Construction Management Plan and an Erosion and Sediment Control Plan. As such, ambient air quality will be maintained once Stillhaven is constructed.

3.8 National Environmental Standards for Freshwater

The Resource Management (National Environmental Standard for Freshwater) Regulations 2020 (**NES-F**) sets standards to regulate activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the project are provisions which prohibit works in and around natural wetlands. Resource consent may be required under the NES-F as works are proposed in and around natural inland wetlands.

The presence of a small potential natural inland wetland has been identified on the site with the extent to be determined by further ecological investigation, with any potential effects managed through voidance where practicable and, mitigation and biodiversity offsetting. There are potential opportunities on site for offsetting wetlands if necessary.

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

The NES-CS sets a nationally consistent set of planning controls and soil contaminant values. Resource consent will be sought where required under the NES-CS and will be subject to conditions (where appropriate) which will ensure that any contaminated soil is managed to protect human health.

Based on the assessment above, it is considered that the Project is **consistent** with the NES-CS.

3.10 New Zealand Coastal Policy Statement

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

3.11 Waikato Regional Policy Statement

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

Stillhaven is consistent and well-aligned with the objectives of the Waikato RPS. Of particular relevance:

- IM-O7 recognises the relationship of tangata whenua with the environment. This Project supports this by:
    - Engaging with iwi and hapū with resource management interests in the site to incorporate cultural values throughout the development, while having regard to the relevant iwi planning documents.

- UFD-O1 seeks to ensure that the development of the built environment occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural, and economic outcomes. The Project achieves this by:
    - Stillhaven is a masterplanned development that will enable growth that is ordered and co-ordinated, and located in a strategic location adjoining an existing township and in proximity to key centres;
    - Ensuring that social and economic benefits of the proposal are realised, including through the provision of increased housing supply, retirement living and care facilities, recreational open spaces, and amenities and services in proximity; and
    - As assessed in Section 4.0 below, potential adverse environmental effects can be appropriately managed, avoided, and/or mitigated.
- UFD-O2 seeks that housing bottom lines as identified in the Future Proof can be met. The Project supports this by contributing to housing supply in the Waikato District and Hamilton City, addressing identified shortfalls for housing across the short, medium, and long terms.
- ECO-O1 requires a full range of ecosystem types, their extent and the indigenous biodiversity that they support t exist in a healthy and functional state. The Project will support this by managing and/or mitigating the ecological effects of the Project in an appropriate way. As set out in the Ecological Memorandum (**Attachment 7**) and assessed in **Section 4.9** below, there will be opportunities to enhance ecological values through new planting across the site, including in the potential restoration of the wetland. LF-O1 seeks to maintain or enhance the mauri and identified values of freshwater bodies. The Project will achieve this by:
    - Providing ecological enhancement in riparian areas through new planting located within and around the site boundaries, and the creation of open space corridors alongside stormwater management corridors following existing farm drains; and
    - Ensuring potential effects on freshwater values can be appropriately managed, including through the effects management hierarchy.
- LF-O5 seeks to recognise the value of high-class soils for primary production and protect high-class soils from inappropriate subdivision, use or development. The site contains LUC Class 2 soils which are classified as high class soils under the Waikato RPS. Whilst the proposal will be inconsistent with LF-O5 as it will result in the loss of some of these soils, as identified in Section 4.10, there are several potential limitations of the soil types on site that will affect the overall value of these soils for primary production.

Overall, it is considered that the Project demonstrates broad and substantive alignment with the Waikato RPS. The inconsistency with LF-O5 is considered to be acceptable on balance with consideration to the suite of RPS provisions that the Project will give effect to and having regard to the significant regional benefits that will be delivered.

3.12 Future Proof Strategy

Future Proof Strategy 2024- 2054 (**FPS**) is a 30-year growth management and implementation plan for the Hamilton, Waipā, Waikato, and Matamata-Piako sub-region. It provides a framework to manage growth in a staged and co-ordinated manner, addressing complex planning issues, especially cross-boundary matters. The strategy seeks to ensure that housing, employment, and transport networks are well-aligned.

It also provides a framework for responding to population growth, climate change, and economic challenges while supporting vibrant, liveable communities.

The key objectives and principles of the FPS that relate to the Project are:

- To support compact urban development across the sub-region, focused within the identified urban enablement areas;
- Expand housing supply to meet diverse housing needs through a range of types and safe, inclusive design;
- Ensure urban growth does not increase the vulnerability of communities to climate impacts;
- Strengthening efforts to build more resilient communities, including supporting a thriving local economy resulting in regional economic resilience.
- Apply environmentally sustainable and water-sensitive design principles; and
- Provide a clear definition between urban and rural areas, including through directing urban development to defined urban enablement areas and village enablement areas.

Stillhaven demonstrates strong alignment with these key objectives and principles as follows:

- As outlined in Section 1.1 above, the Project will increase the supply of housing typologies, including a number of detached housing typologies which are projected to have significant shortfalls in Waikato and Hamilton City. The Project will directly contribute to improving housing choice and variety, as well as housing affordability through increasing competition in the land market, benefitting the wider community;
- Stillhaven will provide retirement living and aged-care beds addressing the structural undersupply of retirement living accommodation and supporting ageing in place through an inclusive design which creates community resilience within the district; and
- The Project will contribute to the reduction of greenhouse gas emissions through construction practices and elements of the masterplan design. The site is not located within a known flood hazard area, and all stormwater flows will be appropriately managed to avoid flooding and ponding effects on downstream environments. Overall, Stillhaven will not increase the vulnerability of communities to climate impacts.

3.13 Te Ture Whaimana o Te Awa o Waikato (Vision & Strategy)

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

As identified in the Infrastructure Memorandum prepared by Maven Associated (refer Attachment 8), the stormwater strategy for the site will incorporate the following key principles to manage stormwater quantity and quality:

- Provision of stormwater quality treatment;

- Limit peak flow from post development to 80% of pre-development levels;
- Secondary flow paths will be designed to dispose of stormwater runoff up to 100-year rainfall events; and
- Provision and active management of stormwater devices to maintain flood carrying capacity.

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

The stormwater strategy will be designed to a best practice framework, and will be discussed as part of ongoing engagement with iwi and hapū to ensure that Stillhaven supports the restoration and protection of the health and wellbeing of the Waikato River.

3.14 Iwi Planning Documents

Engagement with hapū with resource management interest in the Te Kowhai area has been undertaken, with Ngāti Reko, Ngāti Māhanga and Ngāti Tamainupō confirming their interest in being involved in this Project on an ongoing basis.

Of the hapū consulted, Waikato-Tainui has an environmental plan – the Waikato-Tainui Environmental Plan (**WTEP**). This planning document is assessed below.

Waikato-Tainui Environmental Plan

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

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

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

Regular hui with iwi and hapū have been held regarding the Project, and engagement will be ongoing through detailed design and the substantive application. As a result of this engagement, a letter for the Stillhaven site which notes the consultation undertaken and signals that a Memorandum of Understanding will be prepared between the applicant and Ngāti Māhanga and Ngāti Tamainupō is included as **Attachment 11**. A letter from Ngāti Reko is also provided as **Attachment 12**, confirming that consultation has been undertaken and setting out expectation for engagement during the substantive stage. Overall, it is considered that the Stillhaven development will not be inconsistent with the objectives of WTEP.

3.15 Waikato 2070 – Growth & Economic Development Strategy

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

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

Grow Our Communities

- Deliver well-planned and people-friendly communities: The Project will develop a quality urban form with high amenity, incorporating greenway features, multi-use pathways, open spaces, and a neighbourhood centre to provide for amenities and services to the existing and future population of Te Kowhai.
- Promote sustainable and cost-effective land-use patterns: The Project is a master-planned development that will be supported by efficient transport and three waters infrastructure to serve the community now and into the future. Stillhaven is proposed to be undertaken in eight stages, and will be well integrated into existing built form and roading, providing connectivity to the wider Te Kowhai area.

Build Our Businesses

- Economic Uplift: The Project will deliver one-off and ongoing economic benefits, including employment opportunities.

Embrace Our Identity

- Promote our culture: Iwi and hapū have been engaged through the preparation of the Stillhaven masterplan and referral application, and engagement will be ongoing as design details are confirmed through the substantive application. The Project will include opportunities to represent cultural values, in particular through planting, artwork, and story boarding within the proposed open spaces.
- Celebrate our history: Ecological enhancement, including selective native species within riparian areas will uphold the identity and natural character of the rural Waikato landscape.
- Protect our environment: Stillhaven has been carefully designed to integrate with the existing and future planned character of Te Kowhai. Landscaping will assist in promotion ecological and environmental protection and restoration.

Overall, Stillhaven is a well-considered and strategically located development that supports the key pillars of Waikato 2070. It provides targeted housing, protects natural and cultural resources, supports economic development, and contributes to the long-term vision of connected and sustainable communities within the Waikato District. This alignment demonstrates the Project's strategic merit and overall consistency with Waikato 2070.

3.16 Waikato District Housing Strategy (2024)

The Waikato District Housing Strategy (2024) is a comprehensive 10-year plan to address housing challenges across the Waikato District. The strategy acknowledges that the district is facing unprecedented growth, creating a housing challenge that needs to be addressed quickly. The Project demonstrates a strong alignment with the Strategy. Specifically, the Project's objectives and planned outcomes directly support the Strategy's vision that "everyone in our community has access to a home that is safe, healthy, and affordable, and is part of a prosperous, resilient, and connected community".

Stillhaven is particularly aligned with the Strategy with respect to increasing housing supply and diversity and contributing to the provision of safe, healthy, and affordable homes to the community, including providing for the aging population. The Project helps to address core issues such as housing supply, infrastructure integration, and community connectivity while embodying the Strategy's principles of equity, sustainability, and holistic planning. Overall, the Project is well-positioned to contribute to the district's housing goals and is aligned to the Strategy's framework.

4.0 Assessment of Effects

The proposal will not generate significant adverse environmental effects, as any adverse effects on the environment will be appropriately avoided, remedied or mitigated to be minor or less than minor in nature. The key potential adverse effects are addressed in general below and should be reviewed in conjunction with the supporting technical expert memorandums accompanying this application.

4.1 Economics

The Economic Impact Assessment (**Attachment 5**) confirms that the Stillhaven Project will generate substantial economic benefits for the Waikato District, Hamilton City and the wider region, both during construction and once the development is fully established. The one-off construction and development activity (residential and retirement village capital works) is estimated to contribute between $94.7 million and $120.7 million in direct and indirect GDP, rising to between $135.9 million and $173.0 million once induced effects are included, and to support a total of 1,344 MEC-years of employment (1,816 MEC-years including induced effects) over the 12-year development period. Around 70% of the total GDP impact is retained within the Waikato region, with Hamilton City capturing the largest share (approximately 62%), reflecting its role as the principal source of construction materials, trades and professional services, and between $72.3 million and $92.1 million in income returned to households. In addition to the land development capital works, the construction of the dwellings themselves is indicatively estimated to generate a further $420 million in direct and indirect GDP and approximately 4,600 MEC-years of employment, to be refined through the substantive application. These effects represent a significant stimulus to the region's construction, engineering and professional services sectors.

In addition to the direct quantitative benefits outlined above, the Project is also considered to give rise to several qualitative economic benefits, including direct and flow-on operational economic benefits. These include making a meaningful contribution to the substantial identified shortfall in greenfield housing capacity across Hamilton City and the lower Waikato housing market (projected demand of approximately 29,800 greenfield dwellings over the long term under the medium series projection), broadening housing choice through a mix of lot sizes (approximately 300m² to 1,250m²) that addresses an identified gap for conventional suburban and larger rural-edge lots, and providing purpose-built retirement accommodation

that enables older residents to transition to age-appropriate housing within their community, supporting turnover of existing family housing. The development will also expand the Waikato District rating base and is indicatively expected to accommodate $49 million in annual household spending, including $23 million in retail expenditure, supporting local businesses and services, with the retirement village generating ongoing demand for health, aged care and support services.

As addressed above, the Project will also contribute to a well-functioning urban environment by extending the existing Te Kowhai township in a logical and integrated manner, in a location well connected to Hamilton and the Te Rapa employment area, with a neighbourhood centre improving local service provision and reducing the need for longer-distance travel. While there is an opportunity cost associated with foregone dairy farming on the site, estimated at $12.9 million to $26.1 million over a 35-year period, this is substantially outweighed by the assessed economic benefits of the development.

Relying on the Economic Assessment, the Project is considered to deliver significant economic benefits, with strong positive effects for employment, housing supply and growth across the Waikato District, Hamilton City and the wider region.

4.2 Construction

Earthworks

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

Construction Noise and Vibration

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

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

Contaminated Land

A Preliminary Site Investigation (**PSI**) (**Appendix 13**) has been undertaken by ENGEO, which confirms the likely presence of contamination associated with historical and current rural production activities undertaken on the site, including animal management and stock handling areas, agrichemical and oil storage associated with current and former farm buildings, a farm dump/disposal area, waste stockpile areas, site-wide agrichemical application (with previous soil sampling indicating elevated cadmium levels in topsoil), and the potential presence of ACMs associated with existing and former farm buildings. A potential off-site source, being a chemical storage area associated with a neighbouring helicopter spraying operation, has also been identified. While the properties are not registered on the Waikato Regional Council Land Use Register, activities including earthworks and subdivision are therefore likely to trigger

resource consent under the NESCS, with the consenting pathway under the WRP contaminated land provisions (including potential permitted activity status under Rule 5.3.4.6) to be confirmed following the Detailed Site Investigation.

The PSI concludes that contamination, if present, is likely to be limited in nature and largely confined to shallow soils, and that where identified through detailed intrusive investigation, contamination above relevant human health and environmental criteria can be remediated to appropriate concentrations using traditional remedial techniques. None of the HAIL activities identified are considered likely to present a risk that cannot be suitably managed or mitigated, and the site is considered suitable for the proposed land use change, subdivision and development. The remediation of contaminated land can be adequately addressed through the preparation of a Detailed Site Investigation, CSMP and/or RAP prepared by a SQEP in support of the substantive application, together with asbestos surveys of pre-2000 buildings prior to demolition. It is therefore considered that any potential contaminated land effects can be appropriately managed through the resource consent requirements under the NESCS and WRP.

Stability

With respect to slope stability, the Preliminary Geotechnical Assessment concludes that the site is not generally considered to be at risk of slope instability based on the site topography. A site walkover by an experienced engineering geologist will be required to confirm slope stability conditions. Any design proposal that includes high or steep slopes for stormwater basins, swales, or cuts will require an assessment of slope stability as part of the design process. Based on these findings, it is considered that the site can accommodate the proposed development, subject to confirmation and any necessary slope stability assessment and design.

4.3 Archaeology

An Archaeological Assessment has been prepared by Dr Warren Gumbley of W Gumbley Ltd (refer to **Attachment 14**). There are no archaeological sites recorded in the national database within the project area, with the nearest recorded site (S14/11, recording the discovery of a burial in a sand quarry) located 1.5 km to the south. Recorded archaeological sites in the wider area are strongly clustered along the Waikato and Waipā Rivers and their tributaries, and the long history of site recording in the Middle Waikato Basin strongly indicates that the project area falls outside the areas where archaeological sites would normally be expected.

A site inspection was completed on 24 June 2026 in the company of Jo Kukutai (Ngāti Māhanga) to identify the potential for any unrecorded archaeological sites, focusing on the elevated Horotiu soil outcrops where occupation would most likely have occurred. Nine soil auger samples were examined and no obvious archaeological evidence was found. The natural history of the local landscape, which comprised part of the Repo Maire wetland, further supports the absence of archaeological sites within the project area. On the basis of the desktop analysis and site inspection, the assessment concludes that there is very little potential for archaeological sites within the project area; if archaeology is present, it is likely to take the form of a burial or other very localised deposits, and this risk can be accommodated using a standard accidental discovery protocol, which will be included as part of the substantive application.

On this basis, it is considered that the proposed development will not adversely affect archaeological values.

4.4 Infrastructure and Servicing

The preliminary infrastructure and servicing strategy for Stillhaven is summarised below and is further detailed in the Engineering Memorandum prepared by Maven and included at Attachment 8.

Stormwater

A new stormwater network will be created to service the site and manage stormwater flows across eight catchments (A-H). The primary stormwater management features within the proposed development will comprise a series of wetland ponds designed to service each development area within the site. On-lot detention tanks and a piped road network will manage flows up to the 10-year ARI event, with larger events conveyed overland to the wetlands. The wetlands are sized to accommodate the 100-year ARI event and will discharge at controlled rates limited to 80% of pre-development levels to the existing stream.

The proposed wetlands will also provide stormwater quality treatment and will be designed in accordance with the Waikato Regional Infrastructure Technical Specifications (RITS) and other relevant technical standards. In addition, two new multi-functional greenways, as shown in the Masterplan, will maintain stormwater conveyance through the site and provide additional flood storage, receiving wetland discharges from events exceeding the 100-year ARI event. Detailed hydraulic modelling at subsequent design stages will confirm system performance and identify opportunities to mitigate existing flooding issues experienced by neighbouring properties.

Water Supply

Maven has investigated a range of options for potable water supply. The preferred option is connection to the new reticulated water supply main currently under construction along Horotiu Road to service the wider Te Kowhai area, with Waikato District Council and IAWAI to confirm the connection point and available capacity following commissioning. This is not, however, the only servicing pathway available to the Project. The two existing on-site bores will supply water during construction and are able to provide an interim potable supply, subject to the necessary approvals and water quality requirements, until permanent servicing infrastructure is available. The final water supply solution, including the timing and staging of any connection, will be confirmed through detailed design at the substantive application stage.

Wastewater

Similar to water supply, Maven has investigated a range of wastewater servicing options, including reticulated, decentralised, and at-source solutions. The preferred option is connection to the new wastewater main currently under construction along Horotiu Road, with the site predominantly serviced by gravity reticulation supported by new pump stations. This approach is consistent with the preferred long-term servicing approach for the Te Kowhai growth area. Where required, however, a decentralised servicing solution may also be adopted, subject to further assessment and approval by the relevant authorities. The final servicing solution, connection staging, and any strategic capacity upgrades will be confirmed through detailed wastewater modelling and design.

Overall, the Infrastructure Memorandum confirms that the site can be adequately serviced. While connection to the Horotiu Road water and wastewater infrastructure is the preferred servicing pathway, the availability of interim and alternative solutions means the development is not reliant on its delivery. Therefore, it is considered that there will not be any significant adverse effects in relation to infrastructure and servicing.

4.5 Groundwater

A Hydrogeological Memorandum, included at **Attachment 15**, has been prepared by WGA to assess potential effects on groundwater resulting from earthworks, construction dewatering and on-site stormwater and wastewater infrastructure, as well as the potential water supply for the development, which may be provided from the Waikato River via Hamilton City Council's existing intake or by on-site groundwater bores. WGA's preliminary assessment confirms that those activities which have the potential to interact with groundwater are relatively standard for land development projects in the Hamilton area and can be appropriately managed through detailed design, monitoring and mitigation to avoid adverse drawdown, mounding and discharge effects, including effects on wetlands and nearby groundwater users. Based on WGA's experience and the information received and known to date, including regional hydrogeological data and data from comparable nearby developments, WGA conclude that the effects on the environment can be managed with suitable conditions and that there is no reason why the proposed development could not proceed.

4.6 Transportation

A Transportation Memorandum has been prepared by Flow Transportation Specialists and is included as **Attachment 16**. In summary, their assessment identifies:

- The proposed development will provide opportunities to improve access to public transport services, including the creation or extension of existing local bus services to service the site, supported by infrastructure such as bus stops and shelters, to be evaluated in further detail for the substantive application;
- An active mode network internal to the site will enable access between the activities available, with footpaths on both sides of all local roads, dedicated cycling infrastructure on collector roads, and off-road connections aligned with stormwater reserves. There is the opportunity to establish walking and cycling connections to Te Kowhai village, which is within walking distance (approximately 1.5km) of the majority of the site, including Te Kowhai School, providing benefits for the existing population;
- Three separate access points are proposed to the development, comprising two new intersections onto Te Kowhai Road and one onto Horotiu Road, to be vested in Council, with external connections delivered from the initial stages;
- The development is expected to generate approximately 634 vehicle trips in the weekday peak hour. Upgrades to the proposed site access intersections are likely, including right turn bays for safety purposes, however further fundamental upgrades such as roundabouts or signalisation are unlikely to be required, with traffic demands remaining well within the carrying capacity of the surrounding road network;
- The exact extent and triggers for these works will be determined through the Integrated Transport Assessment (**ITA**) prepared as part of the substantive application, which will include assessment of each development stage, intersections beyond the immediate vicinity of the site (including the Te Kowhai Road / SH39 intersection), and use of the Waikato Regional Transport Model.

Overall, Flow conclude that the surrounding transport network is expected to accommodate the traffic demands from the site without significant fundamental upgrades, and that the transport effects of the proposal can be appropriately managed. On this basis, it is considered that any transport effects can be appropriately avoided and mitigated.

4.7 Character and Amenity

An Urban Design Memorandum has been prepared by Barker & Associates (**Attachment 6**) and includes a high-level assessment of the urban design aspects of the proposal and conceptual masterplan. The Memorandum includes analysis of the site's context and constraints, movement and connectivity, block structure and interfaces with adjoining land uses, residential amenity, and the provision of open space and integration of natural features. The findings of the Urban Design Memorandum are summarised below:

- Two primary spine roads establish the principal structure of the development, with three vehicular access points providing multiple connections to Te Kowhai Road and Horotiu Road. This establishes a legible movement framework with a range of route choices, provides accessibility between the development and the existing Te Kowhai community, and incorporates two indicative future connections to the north to integrate with potential future growth.
- Local roads branching from the spine roads are generally configured as interconnected loops or blocks, promoting permeability and legibility. Four cul-de-sacs respond to the site's stream corridors, stormwater reserves and open space network, with a further three within the central higher density area enabling east-west orientated lots with good solar access. Their connectivity effects are managed through adjoining pedestrian links, maintaining walking and cycling permeability.
- Pedestrian and cycle connectivity is supported through footpaths on both sides of all internal roads, cycling infrastructure adjoining the primary spine roads, and opportunities for additional pedestrian routes along the riparian corridors.
- Blocks are generally arranged to orientate lots towards the street network, reinforcing activity and passive surveillance of the public street environment and supporting positive CPTED outcomes, with the predominantly north-south block orientation providing good solar access for future dwellings and outdoor spaces.
- Deeper blocks and larger lots (greater than 1,250m²) are provided along the site's external interfaces with adjoining rural-residential and farmland, creating opportunities for increased building setbacks and landscape buffers, providing a gradual transition at the rural-urban interface and assisting in managing potential reverse sensitivity effects.
- The range of lot sizes and the provision of a retirement village will accommodate a variety of household types, with smaller lots (approximately 300–400m²) located close to the neighbourhood centre, central public open space and central stream network, enabling higher densities to benefit from convenient access to community facilities.
- Two neighbourhood centres are proposed — a central node (~3,000m²) and a second node at the Te Kowhai Road entrance (~2,000m²) — creating an opportunity to establish a visual anchor with a strong relationship to the street network and convenient access to local services and amenities for future residents and the existing community. Appropriate interface treatments, separation and screening between future commercial uses and adjacent residential lots will need to be considered to manage potential reverse sensitivity effects such as noise, delivery hours and lighting.
- The open space network is well integrated, with the principal public open space (~6,000m²) positioned adjacent to the central waterway and its riparian margin, of a size and configuration providing flexibility for passive and active recreation as a central community space. The watercourse corridors are designed as multi-functional green corridors (10–20 metres wide) integrating ecological, stormwater and

movement functions, supported by adjoining public streets and pedestrian connections to promote accessibility, activation and passive surveillance.

Overall, the Memorandum finds that Stillhaven will deliver a well-connected and legible neighbourhood that responds appropriately to the site's natural features, provides a logical and adaptable block structure, supports good residential amenity, and integrates open space and waterways as key elements of the neighbourhood. Subject to a refined design, further technical inputs and the development and implementation of appropriate design controls, the proposal can be supported from an urban design perspective.

4.8 Cultural

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

Engagement has been undertaken with mana whenua throughout the life of the Project and will continue as the Project progresses. As detailed in **Attachments 11** and **12**, position letters confirm that Ngāti Reko, Ngāti Māhanga and Ngāti Tamainupō have been actively involved and consulted to date. Through continued, meaningful engagement, it is anticipated that any potential adverse cultural effects can be appropriately avoided, remedied, or mitigated.

Mitigation measures may include the implementation of appropriate cultural protocols (such as karakia, cultural monitors, and site-specific procedures), mana whenua involvement in the design process, and te incorporation of indigenous planting. These measures collectively ensure that cultural values are embedded within the project's design and delivery.

While there remains a potential risk of encountering archaeological material during construction, it is considered this can be effectively managed through an Accidental Discovery Protocol. The Project also represents an opportunity to reflect and celebrate the area's cultural heritage through design. This will be achieved by incorporating iwi and hapū expertise to express cultural narratives and values which are currently not visible in the landscape through built form, public spaces, artworks, indigenous flora, and materials that signify the re-establishment of mana whenua presence and aspirations.

An MOU has been signed with Ngāti Māhanga and Ngāti Tamainupō. The MOU will provide a record of intent and understanding, confirming Ngāti Māhanga and Ngāti Tamainupō support in principle for the project, subject to the completion of a Cultural Values Assessment (**CVA**). The MOU will formalise the commitment to prepare a CVA to inform and support the substantive application.

4.9 Ecology

An Ecological Assessment has been prepared by EcoResto (**Attachment 7**), which identifies the existing terrestrial and freshwater ecological features across the site and provides an overview of their value. The assessment draws on a field assessment conducted on 10 June 2026, supplemented by desktop review, and notes that the site falls within the Hamilton Ecological District, one of the most heavily modified ecological districts in New Zealand, where less than 2% of indigenous vegetation remains.

The key features include an area at the southern end of the site exhibiting attributes consistent with a natural inland wetland (subject to confirmation through formal wetland delineation and hydric soil investigation), a network of highly modified watercourses comprising predominantly straight-cut, ephemeral farm drains, and a single channel identified as a natural watercourse distinguished by its

sinuous planform and irregular bank morphology. As previously outlined, indigenous vegetation is minimal, with no indigenous trees, shrubs or native plant communities of note identified within the works area, the remainder of the site consisting of exotic pasture, scattered mature exotic paddock trees, hedgerows and woody debris. The assessment identifies habitat features with potential to support protected native fauna, including potential long-tailed bat (Nationally Critical) roost trees, and drainage channels and margins with potential to support inanga, longfin eel, brown mudfish and black mudfish (all At Risk – Declining), copper skink, and indigenous avifauna (swamp harrier, welcome swallow and grey heron).

EcoResto has identified the potential effects of the proposed development on ecological values, as well as the approaches to ensure these effects can be appropriately managed. Overall, this includes:

- The completion of targeted surveys prior to any works — including acoustic bat monitoring, herpetofaunal pitfall trapping, eDNA sampling of on-site waterways, formal wetland delineation, and a pre-clearance nesting bird check — to confirm presence or absence of the identified species and features;
- The preparation and implementation of management plans to support the statutory approvals likely to be required, including Wildlife Act Authorisations with an accompanying Bat Management Plan for long-tailed bat and a Lizard Management Plan for copper skink, together with fish salvage and translocation authorisations under the Conservation Act 1987 for native freshwater fish;
- The design, removal and upgrading of culverts and other instream structures in accordance with the New Zealand Fish Passage Guidelines and NES-F fish passage standards, including approval under Regulation 42 of the Freshwater Fisheries Regulations 1983 where required;
- The implementation of the effects management (mitigation) hierarchy with respect to the natural watercourse and any confirmed natural inland wetland habitat, in accordance with the NPS-FM no-net-loss policy.

In addition, the Project presents an opportunity to enhance ecological values through riparian planting and naturalisation of retained watercourses, restoration of wetland habitat, and the implementation of stormwater treatment wetlands with indigenous vegetation and landscape planting.

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

4.10 Soils

As detailed in the Desktop Soil and Land Use Capability Assessment (refer to **Attachment 9**) prepared by Landsystems (Dr Reece Hill) and outlined above, the site is underlain entirely by LUC Class 2 soils, comprising two units under the regional (1:50,000 scale) NZLRI mapping: LUC 2w2 (Te Rapa peaty silt loam, an Organic/peat Soil), covering 98.2 ha (94.3% of the site), and LUC 2s1 (Horotiu-Te Kowhai complex, Allophanic and Gley Soil), covering 6.0 ha (5.7%) on the southern margin. The site contains no LUC Class 1, 3 or 4 land under this mapping.

As all of the site is LUC Class 2 and is zoned General Rural, and none is identified for future urban development, the site meets the interim definition of highly productive land under clause 3.5(7) of the NPS-HPL. Because the December 2025 NPS-HPL amendments (the clause 3.5(7)(b)(iii) transitional provision and clause 3.6(6) exemption) apply only to LUC Class 3 land, and the site contains no Class 3 land, those carve-outs do not apply.

The picture under the Waikato District Plan (Operative in Part) high class soils definition is different, because that definition excludes peat (Organic Soil) soils. Landsystems' assessment identifies that, adopting the NZLRI/NZFSL classification, the 98.2 ha (94.3%) of LUC 2w2 land is excluded from the high class soils definition by the peat carve-out and is therefore not high class soil, while only the 6.0 ha (5.7%) of LUC 2s1 land, being Allophanic Soil, meets the high class soils definition. Interpretation of aerial imagery identifies 3.00 ha (2.9%) of the site as non-productive land (the dwelling and curtilage, sheds, permanent farm races, stockyards and barns), leaving 101.2 ha (97.1%) as available productive land, predominantly in pastoral grazing and feed production.

Importantly, the assessment notes that the more detailed S-Map mapping characterises the dominant Te Rapa soil differently, with no Organic Soils mapped at the sibling level. If confirmed by on-site soil profile assessment, parts of the 98.2 ha currently excluded by the peat carve-out could instead qualify as high class soil under the Class 2 limb of the WDP-OiP definition. As this is a desktop assessment based on regional-scale mapping, on-site soil profile assessment is required to resolve this divergence and confirm the final high class soil extent. The assessment also records that the dominant productive constraint across the site is the organic peat substrate and its associated wetness limitation and peat subsidence risk, with the small, fragmented LUC 2s1 areas unable to support a viable horticultural enterprise in isolation, such that the established and reasonably foreseeable productive use is pastoral grazing and feed production within the wider Waikato basin dairy support system.

Having regard to the above, and to the actual extent of high class soil present, it is considered that the potential adverse effects of urban development and the loss of highly productive and high class soil are outweighed by the benefit of providing needed housing supply and variety.

4.11 Positive Effects

Stillhaven will deliver a number of positive effects, including but not limited to:

- Increasing housing supply within a location that will benefit people and communities in both the Waikato District and Hamilton City. In particular, Stillhaven includes provision for a variety of housing types and densities;
- The co-location of a retirement village, residential lots of varying sizes and typologies, commercial centre, and open space creates a balanced land-use mix that supports activity, with residents and visitors present at different times of day;
- The retirement village will provide older residents with a secure, socially connected, and supportive environment, enhancing quality of life while contributing to more efficient delivery of local health and support services;
- The provision of a modern, integrated care facility at Stillhaven delivers a purpose-built facility in a high-amenity setting making a clear and measurable contribution to meeting identified regional;
- Enhancement of ecological values through new planting within riparian areas, the proposed wetlands, open spaces, and within the road corridor;
- Generation of a wide range of economic benefits, including providing new employment opportunities and GDP value add, as identified within the Economic Memorandum;
- Provision of new open spaces and passive recreation which will provide for active and passive recreation needs of future residents; and

- With respect to the above, the creation of a well-functioning urban environment that will contribute to the social, economic, and cultural wellbeing of people and communities.

4.12 Mitigation

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

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

5.0 Engagement and Consultation

The applicant has undertaken engagement and consultation with key stakeholders, including iwi and hapū, as set out below. Copies of correspondence and minutes, along with a copy of the Consultation Pack that was presented and shared is also included at **Attachment 17**.

The following is a summary of consultation undertaken:

- Iwi and hapū - Ongoing engagement and consultation has been undertaken with Ngāti Reko, Ngāti Māhanga and Ngāti Tamainupō. A series of hui have been held to discuss the project and the referral application. Following these discussions, a letter of support for the referral application has been received, and a MOU has been signed between the applicant and Ngāti Māhanga and Ngāti Tamainupō to formalise the preparation of a CVA (refer to **Attachment 11**). A position statement confirming engagement undertaken to date has also been received from Ngāti Reko and is included as **Attachment 12**.
- Future Proof Partners – A meeting was held on 16 June 2026 between the applicant, Waikato District Council (**WDC**), Waikato Regional Council (**WRC**) and Future Proof Partners, Hamilton City Council (**HCC**), New Zealand Transport Agency (**NZTA**), and IAWAI – Flowing Waters (**IAWAI**) to discuss the Project. The meeting was the continuation of preliminary engagement, and further engagement will be undertaken prior to submission of a substantive application if successfully referred. A Statement of Facts from WDC is included within **Attachment 17**.
- Ministry for the Environment (**MfE**)- Pre-lodgement consultation invited via email on 29 June 2026. MfE responded on 30 June 2026 noting that MfE is no longer a relevant administering agency and the requirement for pre-lodgement consultation under section 11 has been removed.
- Ministry of Education – Consultation was initiated via email on 15 June 2026 introducing the Project to Ministry of Education and requesting a meeting to discuss and seek feedback. No response has been received to date.
- Department of Conservation – Pre-lodgement consultation invited via formal application to DoC email at fasttrackapplicationenquiries@doc.govt.nz on 29 June 2026 notifying intent to lodge a referral application, along with consultation package including ecology memo. A response was received on 29 July 2026 including a written response (refer **Attachment 17**) confirming that WAA and CFAA will likely be needed for protected species on site and noting that they found no inconsistency with their

statutory planning documents at a high level. The Applicant will continue to engage with DOC prior to the submission of a substantive application.

- Heritage New Zealand Pouhere Taonga - Pre-lodgement consultation invited via email on 29 June 2026 notifying intent to lodge a referral application, along with consultation package including archaeology memo. A response was received on 22 July 2026 (refer **Attachment 17**) noting that HNZPT consider that there is no requirement for an authority prior to undertaking earthworks for the Project. HNZPT noted that ongoing consultation should be sought during the substantive application process, and that the Project area is of interest to iwi.

6.0 Conclusion

Having undertaken a high-level planning assessment, it is considered that there are no planning related reasons why Stillhaven could not proceed under the Fast-Track Approvals Act 2024. Through strong design and technical input, Stillhaven can achieve an urban environment that positively impact future residents and the wider Waikato and Hamilton City community, without having adverse environmental effects.

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