

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

Project name	Brymer FTAA-2505-1063
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All sections of this form with an asterisk (*) must be completed.

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

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

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

Managers signoff



Tony Whittaker

Acting Chief Executive

Date: 18 July 2025

18 July 2025

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

Dear Ilana Miller

FAST-TRACK PROPOSAL: Brymer Development - Reference FTAA-2505-1063

Thank you for the invitation to Waikato District Council to provide written comments on the referral application for the Brymer Development.

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

Should you have any queries regarding the content of this document please contact James Fuller, Principal Spatial Planner directly on James.Fuller@waidc.govt.nz.

Kind Regards



Tony Whittaker
ACTING CHIEF EXECUTIVE
WAIKATO DISTRICT COUNCIL

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

Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please also confirm this in writing

1. Within the Waikato District, the only application that would be a competing application is Wallace Road – Stages 1A and 1B Subdivision and Land Use Consent with Associated Roading and Infrastructure. This is a project listed in the Schedule under the Fast-track Approvals Act 2024. Note, this is not an application that has been lodged with Council.

In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please also confirm this in writing.

2. Waikato District Council has not issued any resource consents in relation to the site where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply.

General Comments

Strategic Land Use Pattern and Strategy Alignment

3. The Brymer development area is not identified in the Waikato District Growth and Economic Development Strategy, the Hamilton Urban Growth Strategy, or the Waikato Regional Policy Statement.
4. Waikato District Council is part of the Future Proof sub-regional partnership. The Brymer development was considered for inclusion in the Future Proof Sub-Regional Future Development Strategy 2024 (FDS) but rejected as the FDS identified a sufficiency of housing in the Hamilton metropolitan area over the short, medium, and long term.
5. The other fast-track applications that have been referred adjacent to, or within the Hamilton metropolitan area further increase the number of plan-enabled houses for the next thirty years. The sub-region will have a projected oversupply of housing based on our last Housing and Business Development Capacity

Assessment 2023 (HBA). The infrastructure to service these developments has not yet been funded.

6. Waikato District Council alongside our local authority partners are working proactively with Fast-track applicants to resolve infrastructure issues which is key to unlocking this supply.
7. The development area has a zoning of rural zone (Operative Waikato District Plan) and general rural zone (Operative in Part Waikato District Plan).
 - a. Careful consideration was given when drafting the Proposed Waikato District Plan provisions to enable urban housing developments of this scale. These provisions were not included in the General Rural Zone.
 - b. The current strategic direction of general rural zone is focused on serving rural activities within the district. The Brymer development is not planned to be serviced with appropriate infrastructure (wastewater, potable water and roading) or adjacent to an urban area that has capacity to provide this infrastructure in the near future.

Wastewater and Water Supply

8. Waikato District Council has no water supply or wastewater networks in this area so is unable to service this proposed development with public reticulation. Additionally, there is no capacity in the Hamilton City Council wastewater network to support this proposed development given its proximity to the Hamilton City Council boundary.
9. Independent wastewater solutions are likely to be unsustainable in the medium-long term and present maintenance and cost challenges that inevitably get shifted to the local council. We note that no technical information has been provided to the council(s) to consider as a viable alternative to municipal connections.
10. Existing water allocations for municipal takes cannot support additional development beyond what is identified in the Future Development Strategy without reducing levels of service for other development areas.
11. Bore water abstraction is not confirmed as a viable solution given likely higher water treatment requirements compared to river water abstraction. The higher level of treatment will impose costs on the development and occupants which likely have not been fully quantified and will result in pressure for connection to Hamilton City Council's network.
12. Waikato District Council and Hamilton City Council have recently agreed to establish a joint waters CCO, IAWAI - Flowing Waters. There are no agreements

in place for the water entity to be willing to take on management of water supply and wastewater services from these unplanned developments. Initial discussion with the Brymer development team raised questions about the financial costs of privatised wastewater and water servicing and they were made aware that they will need to comply with Taumata Arowai requirements and prepare to be a water supply authority in their own right.

Stormwater

13. There is an extensive land farm drainage network administered by Waikato Regional Council (WRC) that will receive stormwater discharges from this development. This drainage network is critical for the downstream agricultural land uses, any adverse effects on the functioning of the drainage network will need to be addressed by the applicant.
14. Significant areas of peat will present challenges to development in terms of storm water management, land stability and carbon emissions. Waikato District Council has not seen how the applicant proposes to address these matters.
15. The lack of information regarding the level of detail for stormwater management that will result from proposed roads and accesses does not allow Waikato District Council to be confident that the development will manage stormwater adequately. The existing topography is such that a significant ponding area develops within and adjacent to proposed development area.
16. Stormwater management for the southern flatter part of the site will be challenging to manage and will likely require integration with other landowners which will result in an extensive in land area requirement for stormwater, reducing significantly the land left over for feasible development. The yields may not be as high as currently anticipated by the applicant.
17. The Ohote Stream and Basin have the potential for backwater flooding from the Waipa River which can extend to downstream of the site. Detailed flood hazard assessment would need to be undertaken for the proposed development to address existing and potential future flood hazards on the site, and the effects on both proximal and far-field properties.

Transport

18. Waikato District Council has no plans currently to develop the transport network in this vicinity other than respond to maintenance issues. The Council's Road

network in the vicinity has not been developed to respond to the traffic volumes generated from this development.

19. Waikato District Council does not consider that the main road proposed in the development connecting to the Hamilton City Council's network in the north is acceptable in terms of connectivity. Waikato District Council does not accept the proposed main road should connect to a road which is of a lower hierarchy.
20. Other connections to Waikato District Council roads are also not considered suitable without upgrades to an urban standard.
21. The West Hamilton transport network is under significant pressure from growth, with significant safety issues along SH23 and at the SH23 Dinsdale Roundabout that will be exacerbated by additional traffic.
22. The New Zealand Transport Agency has no plans to improve this part of its network but has identified the need for a West Hamilton Network Review to inform future investment activities.
23. Waikato District Council considers that construction of roads will be challenging with the soil conditions on site. Some of the soil types are indicated to be peat which may require special design / construction treatment. The steep areas too will need to be properly designed for connectivity for multimodal users including walking and cycling and vulnerable users.
24. The indicative plans show the transport networks and intersections as angular, some acute. Consideration will need to be given for safety, sight distances and splays. The expectation is that the road standards in District Plan and Regional Infrastructure Technical Specifications will be complied with. This will be the same for other roading infrastructure including bridges, culverts, and footpaths.
25. Walking and cycling connections to other walking and cycling network should exist for connectivity to be possible. To get to infrastructure readiness may require establishing such connectivity.
26. There are no plans and no funding for high frequency bus services to support this part of Hamilton City so residents will need to rely on their own vehicles in the interim.
27. Waikato District Council has no public transport servicing this area. The intensification signalled in the proposed development may suggest a potential demand for public transport. Waikato District Council models traffic growth in the Waikato Regional Transport Model (WRTM). It is expected a development of this scale will include a Traffic Impact Study including modelling undertaken by the applicant.
28. The Waikato Regional Council is responsible for bus service from 1 July 2025 within the Waikato District while the Waikato District Council remains responsible

for facilities such as bus shelter and other infrastructure. Bus service in the development area will necessitate infrastructure which Waikato District Council will expect to be part of and funded by the development.

29. Any proposed roads or footpaths to be vested to Waikato District Council and have connection into the Hamilton City Council network resulting from this development will require both Council's acceptance.

Summary

While the Hamilton Metropolitan area does not have an under supply of plan enabled land for housing, the Brymer development proposal does have merit in delivering additional housing to the market. There are network capacity and affordability challenges on the infrastructure required to service the Brymer development proposal.

- Waikato District Council has no plans to develop the transport network in the vicinity of Brymer Road other than responding to maintenance issues. The Council does not consider the proposed main road connecting to Hamilton City Council's network acceptable in terms of connectivity, and other connections to Waikato District Council roads are not considered suitable without upgrades to urban standard.
- The applicant would need to work with the New Zealand Transport Agency to access SH23 (Whatawhata Road and NZTA-15) for the expanded traffic volumes.
- Waikato District Council has no reticulated wastewater or water services near the proposed development site. It is noted that Hamilton City Council has:
 - No capacity in the wastewater network and privatised systems can come with challenges in the medium – long term that puts pressure on councils.
 - Existing municipal water allocation does not include this proposal, and it is not known if bore water extraction is a viable option.
- Stormwater management from the proposed development will need careful design consideration to ensure there are no downstream effects on the rural catchment or neighbouring properties.

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

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

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages. Thank you for the opportunity to provide comments on this application. <i>Is this project of regional significance?</i> Waikato Regional Council (WRC) staff do not consider this application to be regionally significant based on the criteria listed in section 22(2)(a) of the Fast Track Approvals Act 2024 (the Act). While the proposal will increase the supply of housing in the Future Proof sub-region (consisting of Waikato District, Hamilton City, Waipā District and Matamata-Piako District), the most recent Future Development Strategy (FDS) for the sub-region enabled 30 years of residential land supply, much of which is already plan-enabled. The FDS identifies that the key constraint on development is not the supply of plan-enabled land but the infrastructure capacity to service the identified settlement pattern. Additionally, since the FDS was adopted in 2024, additional residential development proposals around the periphery of

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Hamilton not anticipated by the FDS have been included as listed projects in Schedule 2 of the Act (*Ruakura 2* with approx. 1350 dwellings and *Southern Links 1* with approx. 1035 dwellings).

The FDS supports compact urban development across the sub-region, focused within key urban enablement areas. The application site is not located within an urban enablement area. Adding more land for development around the periphery of Hamilton has potential to compound current infrastructure issues. Furthermore, we have concerns about impacts of the proposal in relation to land drainage and flooding, including impacts on downstream properties and agricultural land uses. This is discussed in more detail below.

Is this project consistent with local or regional planning documents, including spatial strategies?

Waikato Regional Policy Statement

Urban form and development

The proposal is inconsistent with the Future Proof settlement pattern, which is embedded in the Waikato Regional Policy Statement (WRPS) and the decisions version of Proposed WRPS Change 1 - National Policy Statement on Urban Development 2020 and Future Proof Strategy [2023].

From the WRPS, Policy UFD-P11, Method UFD-M49 and Appendices APP11 – General development principles and APP13 – Responsive planning criteria (Out of sequence and unanticipated developments) are particularly relevant to the proposal and require further assessment.

The Housing Capacity Assessment for the sub-region shows a shortfall of affordable housing¹. The application states that “*Once completed, the project will accommodate a range of affordable housing options that will total up to circa 1,650 residential units and retirement living units*”. This implies that all housing units within the development will be affordable. We consider further data and evidence should be required to support this statement rather than that provided in the economic memorandum submitted with the referral application.

Land and freshwater

Part of the site consists of peat soils. The relevant WRPS policy is *LF-P10 “Manage the adverse effects of activities resulting from use and development of peat soils, including by slowing the rate of subsidence and the loss of carbon by oxidation from peat soils”*.

The memoranda and preliminary assessments contain some information on the applicant’s proposal to manage peat subsidence in relation to earthworks and stormwater management. Further detailed assessment of the proposed management of adverse effects from developing the peat soils for housing would be required as part of any substantive application. This includes management of subsidence, including impacts on construction and infrastructure development, and also how carbon loss will be mitigated and managed.

¹ Future Proof Housing Capacity Assessment 2023

Part of the subject site comprises high class soils as defined by the WRPS. The relevant policy is LF-P11 – “Avoid a decline in the availability of high class soils for primary production due to inappropriate subdivision, use or development”.

Hazards and risks

There are a number of other provisions of the WRPS relevant to the proposal that are difficult to assess consistency with based on the current level of detail provided, including provisions within the Hazards and Risks (HAZ) chapter, particularly in relation to flooding. See further comments on land drainage and flooding below.

Future Proof Strategy

The proposal is inconsistent with the Future Proof Strategy. The Future Proof Strategy is the future development strategy (as required by the National Policy Statement on Urban Development) for the Future Proof sub-region. The Strategy was updated last year (2024) and identifies sufficient residential capacity for the sub-region for 30+ years.

The Strategy has a compact and concentrated approach to growth, with future development focused in and around key growth areas which are identified on the settlement pattern map. As noted above, the application site is not identified as a location for future growth on the settlement pattern map. The Strategy also supports protecting highly productive land for primary production.

HUGS and Waikato 2070

The Brymer development area is not identified in the Waikato District Growth and Economic Development Strategy (Waikato 2070) or in the Hamilton Urban Growth Strategy (HUGS).

Land drainage and flooding

The site is located entirely within WRC’s Waikato Central Land Drainage Scheme (Ohote Basin). We have concerns about impacts of the proposal in relation to land drainage and flooding, including impacts on downstream properties and agricultural land uses.

WRC drainage schemes are typically located in flood prone areas, or drained wetlands with peat soils often prone to subsidence. This drainage scheme is designed to a rural Level of Service (LOS), meaning it is designed to clear runoff from rural pasture within three days from a 10%AEP rainfall/runoff event. This LOS is to prevent pasture die off caused by standing water. It is not intended to drain residential areas.

The drainage system is flood gated from the Waipā River and has an internal stop bank system with floodgates. More water discharging into the system over longer periods could mean that floodgates need to remain closed for longer, increasing ponding. This would affect downstream landowners and may compromise WRC’s ability to meet the rural drainage LOS downstream. Adverse effects on the functioning of the drainage network will need to be addressed by the applicant, which will require a significant amount of further assessment and modelling.

As the proposed development would render this area urban, with little or no upstream rural land that needs to be supported by the WRC drainage network, the area would need to be transferred to the relevant territorial authority for maintenance (to address an urban LOS).

Additionally, preliminary region-wide modelling of a 1%AEP rainfall event indicates there may be potential for flooding issues at the site. Ultimately, a very detailed flood hazard assessment would need to be undertaken for the proposed development to address existing and potential future flood hazards on the site, and the effects on both nearby and downstream properties.

Other site considerations

A large portion of the site has a high probability of Acid Sulfate Soils² (ASS) being present. ASS are naturally occurring soils and sediments that contain iron sulfides (like pyrite) which, when exposed to oxygen (through drainage or excavation), can oxidize and produce sulfuric acid. This oxidation process can lead to acidification of soil and water, potentially harming ecosystems and infrastructure.

While there are no significant natural areas on the site, a kānuka dominated block of vegetation is present and could provide habitat for numerous indigenous species, including bats, birds and skinks, which will require further investigation. We support the proposed retention and enhancement of this block of kānuka. Any substantive application would need to provide further detail on how adverse effects of the proposed development on birds, bats and lizards will be appropriately avoided, remedied or mitigated. Provisions of the Ecosystems and indigenous biodiversity (ECO) chapter of the WRPS will be relevant in this regard.

Water and wastewater

Brymer Farms Limited have an existing consent application lodged with WRC (APP145867) to take groundwater for domestic supply to 2,500 dwellings associated with the Brymer development. This application is currently on s91 hold under the RMA, awaiting lodgement of additional applications associated with the proposal.

There are currently no allocation issues in the Waipa Aquifer or Waikato River catchment. With an application already lodged with WRC to take groundwater for potable supply for the development, the risk of resource allocation issues preventing the resource consent application progressing is low.

The applicant has indicated that they will be applying for water take consents via the FTAA process for dewatering and dust suppression purposes. Allocation availability associated with future dust suppression and dewatering requirements is dependent on the timing of the substantive application.

For such a large scale development (estimated up to 2,500 dwellings) WRC's preference is for wastewater to be reticulated to a municipal wastewater treatment plant as in WRC's experience

² Managing acid sulfate soils | Waikato Regional Council

privately-owned or body corporate managed systems often have challenges with maintenance and discharge consent compliance. However, WRC understands that Waikato District does not have wastewater infrastructure in this location and Hamilton City Council does not have capacity in its wastewater networks to support this development.

Transport

We note that New Zealand Transport Agency will need to give its approval for any access to State Highway 23. Further, we understand that the West Hamilton transport network managed by HCC is under significant pressure from growth, with significant safety issues along SH23 and at the SH23 Dinsdale Roundabout that will be exacerbated by additional traffic.

WRC supports proposed provision for alternative modes of transport such as footpaths, cycle paths and shared paths within the site, linking with established active mode transport infrastructure in Hamilton, however notes that there are no plans or funding for high frequency bus services to support this part of the city.

We note the applicant proposes to provide initial private “public transport” from the development area to the Dinsdale shops until such time as resident numbers justify public transport provided by WRC. WRC supports this in principle, however, notes that WRC may not have funding to extend any service to the site and/or funding may not align with when the applicant expects WRC to take over.

The masterplan indicates a number of bridges and culverts. Early planning should ensure the routes and infrastructure are appropriate and feasible, and take into account the heavier EV buses to be used in the future.

Any competing application or applications?

WRC is not aware of any competing applications.

Sections 124C(1)(c) or 165ZI applications?

No, as at the date of this response.

Conclusion

WRC staff do not consider this proposal to be regionally significant. The relevant Housing Capacity Assessment signals that there is sufficient housing capacity in the district for the next 30+ years, and this proposal is unlikely to contribute to a well-functioning urban environment. It is inconsistent with key local and regional plans and strategies, including the Future Development Strategy. It is also unclear how the proposed development will impact and be impacted by flooding, peat soils, and land drainage.

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

Insert Fast-track logo

Managers signoff

A handwritten signature in blue ink, appearing to read 'A M d'Aubert'.

AnaMaria d'Aubert

Date 23 July 2025

Hon Tama Potaka

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



22 July 2025

CORTP-4727

Hon. Chris Bishop
Minister for Infrastructure
c.bishop@ministers.govt.nz

Tēnā koe Hon. Bishop

Thank you for your invitation to comment on the fast-track consent application for the Brymer Road Development project. This project involves the development of 1,650 residential units (including a 250-unit retirement village) and a 0.3-hectare mixed-use neighbourhood centre with commercial properties (a café and superette), open spaces including ecological restoration, and supporting infrastructure.

As with all new construction, households moving into these units will free up housing elsewhere, helping to increase the supply of housing generally and improving affordability. Over the past decade Hamilton City's rental affordability (as measured by HUD's change in housing affordability indicators measure) has not improved, while New Zealand's as a whole has improved by 7%. Median house prices in Hamilton are currently 7.9 times the median income – up from 6.1 in 2015.

The site was not included in the FutureProof Future Development Strategy, and I note that HUD's initial engagement with FutureProof has surfaced some concerns on their part around the infrastructure needed to support this project. HUD would expect FutureProof, or its constituent councils, to raise these concerns with the Expert Consenting Panel as part of the panel's consultation were you to refer this project to them.

I have no concerns, from the perspective of the Housing Portfolio, about this project being referred to the next stage. Thank you again for the opportunity to comment.

Mauriora

A handwritten signature in blue ink, reading 'Tama Potaka'.

Hon Tama Potaka
Associate Minister of Housing



20 JUL 2025

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Three Fast-track Approvals Act referral applications – Received 26 June:

Dear Chris

Thank you for the opportunity to comment on three applications for referral under the Fast-track Approvals Act (FTAA):

- Out of Scope
- [REDACTED]
- Brymer, FTAA-2504-1063.

I am providing comments in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to have significant economic benefits under section 22(2)(a)(iv) of the FTAA, based on the information provided. I defer to you and other relevant Ministers to assess the remaining criteria.

Out of Scope

Out of Scope

Out of Scope

Brymer - FTAA-2504-1063

This mixed-use residential development is located on the western edge of Hamilton City. The proposal includes the construction of 1,650 homes, which includes a 250-unit retirement village, a neighbourhood centre with commercial facilities, and other open spaces, transport and related infrastructure.

Economic assessments suggest significant short-to-medium term benefits over a projected ten-year period, including a total of over 500 full-time jobs, \$430 million in wages, and a \$720 million boost to GDP. Post-construction, the ongoing annual benefits are estimated to be \$2.4 million in GDP value-added, 23 permanent jobs and \$1.7 million in wages.

Based on these estimates, this proposal could have substantial economic impacts in the short- to medium-term (concentrated in Hamilton). Alongside the short and medium term impacts, this proposal will support ongoing economic activity.

Given that the primary outcome of the proposal would be to provide a significant boost in the housing supply, this application may be best assessed under increasing the supply of housing, address housing needs, or contribute to a well-functioning urban environment section 22(2)(a)(iii) of the Act.

Sincerely



Hon Nicola Willis
Minister for Economic Growth

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

Project name	Brymer Farms
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All sections of this form with an asterisk (*) must be completed.

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

2. Please provide your comments on this application
Comments follow overleaf.

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

Manager's signoff

Jenni Fitzgerald

24 July 2025

Director-General of Conservation s17 comments

Project name	Brymer Farms
Applicant name	Brymer Farms Limited
Application number	FTAA-2505-1063
Project summary details	The project is a master-planned residential and mixed-use development bounded by Brymer and Whatawhata Roads, on the western edge of Hamilton City. The project involves the construction and operation of: a. 1,650 residential units (including a 250-unit retirement village) and a 0.3-hectare mixed-use neighbourhood centre with commercial properties (a café and superette) b. open spaces including ecological restoration, retention of natural wetlands and riparian revegetation c. transport infrastructure including local roads, cycle connections and pedestrian pathways d. services infrastructure including a pump station, water discharge and treatment area, stormwater ponds and use of existing water bores.

1 General comment

- 1.1.1 In accordance with section 17(1)(c) of the Act, the Director-General of Conservation has been invited to comment on the referral application as a relevant administering agency. DOC provides the following comments on behalf of the Director-General.
- 1.1.2 The Brymer Farms application records that the project will require a wildlife approval for the capture, handling, relocation, and for accidental killing of lizards.
- 1.1.3 As the project includes an approval under a specified Act for which DOC is the administering agency, the applicant was required to undertake pre-lodgement consultation in accordance with section 11.
- 1.1.4 In relation to this application, the applicant took steps to consult with DOC prior to lodging. Consultation was initiated on the 14th of May 2025 and the referral application lodged on the 23rd of May 2025. As such, the period available to respond and engage did not enable DOC to provide specific feedback prior to the applicant lodging the referral application.
- 1.1.5 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects it considers it likely that with appropriate design and conditions, effects can be managed to appropriate levels.

1.1.6 DOC is not aware of any other reason the project should not be referred.

2 Minister's decision on referral application

2.1.1 FTAA sections 21 and 22 set out matters to be considered in determining whether a referral application should be accepted.

2.1.2 DOC notes that other agencies are better placed to comment on most matters, including those in section 22. Comments below are therefore targeted to sections where DOC has specific interests or information relevant to the Minister's decision.

2.1.3 For completeness, DOC has considered the criteria for assessing referral applications in section 22 and has not identified anything it considers the Minister should take into account.

2.1.4 Section 21(3) and (4) set out when the Minister may/must decline a referral application. DOC has considered these criteria and comments as follows:

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	The meaning of ineligible activity is set out in s5 of the Act – DOC has considered s5(1)(f), (h), (i), (j) and (k) and has not identified any aspect of the project that would meet the definition.
21(3)(c)	Is there adequate information to inform a decision	With respect to the approvals identified in the application for which DOC is the administering agency, DOC considers the information adequate in terms of a referral decision (but notes that given a potential for further wildlife approvals to be required for the project, it would be in the applicant's interests to ensure there was scope for all potential approvals required in any decision).
21(4)	Are there any other reasons not specified	DOC has not identified any other reasons why the project should not be referred.
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	DOC has not identified any inconsistency with any relevant settlement or other obligation.
21(5)(b)	Would it be more appropriate to deal with the proposed	DOC has not identified any reason why the conservation approval(s) identified should not be dealt with under the FTAA.

Section	Criteria	Comments
	approvals under another Act(s)	
21(5)(c)	Would the project have significant adverse effects on the environment	No comprehensive surveys or investigations have yet been undertaken by the applicant of ecological features, including watercourses and natural inland wetlands and habitat of fauna. As such DOC considers there is the potential for the project to have significant adverse effects given values known/anticipated to be present. Overall, however, based on the high-level information available DOC considers that it is likely adverse effects of the project can be addressed through the design phase and appropriate conditions.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the applicant's compliance history under the Wildlife Act 1953.
21(5)(g)	Would a substantive application have any competing applications	DOC has not identified any competing applications under the Wildlife Act 1953.

3 Other considerations

- 3.1.1 DOC notes that once a referral decision is made, the scope of any subsequent substantive application is confined by that of the referral application. DOC has provided input to a number of fast-track projects to-date where additional conservation approvals that would have been available under the FTAA have not been included in an application. In some of these cases it has been necessary for applicants to seek additional approvals under the specified Acts via normal processing. This can result in inefficiencies, additional costs and undermining of the benefits of the 'one stop shop' approach the FTAA was designed to deliver.
- 3.1.2 Given the lack of assessment undertaken at the referral stage, DOC considers it may be beneficial for the applicant to consider whether it should seek to include additional approvals that would potentially be required on a precautionary basis. To this end, DOC suggests the Minister consider whether further information should be sought from the applicant under s20 prior to making their decision to ensure all approvals in scope of the FTAA and necessary to implement the project are included.
- 3.1.3 In particular, DOC recommends consideration is given to whether bats and birds should be included in the scope of wildlife approvals sought.

4 Matters for the Minister to specify (s27)

- 4.1.1 DOC notes that there is no obligation on an applicant to undertake pre-lodgement consultation with administering agencies in respect of a substantive application for a referred

project. Given the lack of detail available in the referral application DOC considers it would be highly beneficial for the applicant to engage further with DOC as it relates to any conservation approvals (as well as conservation matters subject to RMA consideration) prior to making any substantive application. Benefits include ensuring information necessary to support decision-making with respect to the conservation approvals is included; supporting the management of any actual and potential adverse effects on the environment; and early identification and resolution of any issues.

- 4.1.2 To this end, DOC suggests the Minister consider specifying that evidence of pre-lodgement engagement with DOC be submitted with the substantive application, should the decision be to accept the referral application.

Jenni Fitzgerald
Fast-Track Applications Manager

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

Date: 24th of July 2025

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

17 July 2025

The Chief Executive
Environmental Protection Agency
Private Bag 63002
Wellington 6140
fasttrack@epa.govt.nz

Dear Dr Freeth

Future Proof is the urban growth planning partnership for the Hamilton City Council, Waikato, Waipā and Matamata- Piako Districts and Waikato Regional Council, together with Iwi and government agencies.

In 2024, Future Proof adopted its Future Development Strategy (FDS) after a special consultative process that included a public submission and hearing process. The FDS enabled 30 years of residential land supply but noted a potential shortfall of industrial land around Hamilton in the medium term. The FDS acknowledges that the key constraint on development is infrastructure capacity to service the identified settlement pattern.

Since the FDS was adopted, most of the land identified for development over the next thirty years has either been plan enabled or has been included in Schedule 2 of the Fast Track Approvals Act 2024. The infrastructure to service this development has not yet been funded.

The proposed development of Brymer Farms Limited (FTAA-2025-1063) was rejected by the Future Proof Hearings Sub-Committee for the following reasons:

Out of sequence and unanticipated development submissions				
Submitter	Sub and Point Number	Context	Submission Point	
Brymer Farms Ltd	32.1	Out of sequence / unanticipated development - Waikato/Hamilton fringe	Submitter seeks for the Brymer site to be signalled as a Future Urban Area in Map 6: Current and Future Urban Areas.	Not recommended for inclusion in the strategy. The land is not required to provide sufficient residential capacity in the short, medium or long term.

An extract of the officer report to the Hearings Sub Committee with background information is attached as Appendix 1.

As Chair of the Future Proof Hearings Sub-Committee- (which includes representatives of all Future Proof partners), I note that the key concerns raised by the Committee with respect to this development during deliberations were:

Waste Water and Water Supply

4. There is no capacity in the HCC waste- water network to support this development
5. Existing water allocations for municipal takes cannot support additional development beyond what was in the FDS without reducing levels of service for other development areas.
6. Bore water abstraction is not confirmed as a viable solution given likely higher water treatment requirements compared to river water abstraction. The higher level of treatment will impose costs on development and occupants which likely have not been fully quantified and will result in pressure for connection to HCC's network.
7. Independent waste-water solutions are likely to be unsustainable in the med-long term and present maintenance and cost challenges and pressure for connection to HCC's network.

In addition to the Sub-Committee's consideration, Hamilton City Council and Waikato District Council have recently agreed to establish a joint waters CCO. There are no agreements in place that the water entity will be take on management of water supply and waste-water services from the developers. Developers need to be aware that they will need to comply with Taumata Arowai requirements and prepare to be a water supply authority, if a connection agreement cannot be established.

Stormwater

9. There is an extensive local authority-maintained farm drainage network that will receive stormwater discharges from this development. This drainage network is critical for the downstream agricultural land uses. Adverse effects on the functioning of the drainage network will need to be addressed by the applicant.
10. Significant areas of peat within the development area will present challenges to development in terms of storm water management, land stability, and carbon emissions.
11. Stormwater management for the southern part of the site will be challenging and will likely require integration with other landowners and require an extensive land area, reducing significantly the land left over for feasible development - so the yields may not be as high as currently anticipated by the developer.
12. The Ohote Stream and Basin also have the potential for backwater flooding from the Waipa River which can extend to downstream of the site. Detailed flood hazard assessment would need to be undertaken for the proposed development to address existing and potential future flood hazards on the site, and the effects on both proximal and far-field properties.

Transport

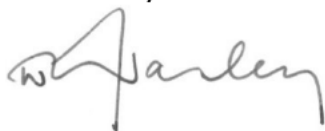
13. The West Hamilton transport network is under significant pressure from growth, with significant safety issues along SH23 and at the SH23 Dinsdale Roundabout that will be exacerbated by additional traffic.
14. NZTA has no plans to improve this part of its network but has identified the need for a West Hamilton Network Review to inform future investment activities.
15. There are no plans and no funding for high frequency bus services to support this part of the city so residents will need to rely on their own transport options in the interim.

This letter confirms that the developer has met with the Future Proof partners through our Fast Track Action Team process. Future Proof has not re-assessed the findings of its housing and building capacity assessment.

The key issue in our subregion is not an under supply of plan enabled land, but the affordability of the infrastructure required to service that land. It is noted that the individual partners that are deemed to be "relevant local authorities" will respond to the EPA in their own right.

Future Proof is neither opposed or in support of this fast-track application but wishes to highlight to the EPA, a range of issues that will require to be addressed in respect of this development proposal.

Your sincerely



Bill Wasley
Independent Chair
Future Proof Implementation Committee
Future Proof Hearings Sub Committee

Appendix 1 – Extract of Officer Report to Hearing SubCommittee			
Submitter	Location	Within FP enablement area?	Submission on previous FP strategy?
32. Brymer Farms Ltd	Hamilton West adjacent	No	Yes
Proposal	Include site within the urban enablement area for future residential (retirement village, general to higher density and neighbourhood centre).		
Information provided:	Submission references the following investigations: • Economic Assessment • Soil and Land Use Capability Classification Assessment • Infrastructure Assessment • Preliminary Ecological Assessment • Hydrology Review • Potential for Water Reuse • Road Network Connectivity Assessment • Preliminary Geotechnical Assessment Report • Detailed Site Investigation		
Key considerations:	• Part of Waikato Central drainage scheme • Highly productive land • Peat • SH23 constraints • Water and wastewater servicing		
Other relevant processes?	• Not identified in Hamilton Urban Growth Strategy (HUGS) or Waikato 2070 • Southern Links Form and Function Review		
Map -refer next page			



18 July 2025

To: Ilana Miller
General Manager, Delivery and Operations
Minister for Infrastructure
c/- Ministry for the Environment
contact@fasttrack.govt.nz

cc: Donna Tracey, Waikato District Council
Bill Wasley, Chair – Future Proof

Dear Ilana Miller

Statement of Facts in relation to Fast Track Referral Application for Brymer Farms Limited (FTAA-2025-1063)

Further to your letter to the Chief Executive of Hamilton City Council (HCC) (updated) querying whether there are any matters that HCC considers may affect delivery of the project, we comment below.

Prior to the advent of Fast Track HCC was working on the “Emerging Areas” study which was examining the possibility of re-zoning to industrial and residential one or several significant areas on Hamilton’s periphery. The Emerging Areas project was seen as an opportunity to unlock new industrial land at scale and in turn, provide significant economic benefits to the City and Region.

The Brymer Farms Limited site (the “Brymer Site”) was considered for inclusion in that study but discounted because of various issues attached to its development, which will be discussed shortly, but also because of the absence of any industrial proposition. Prior to Fast Track the first critical lens for examining potential areas was their need as demonstrated through the Housing and Business Assessment (HBA) identification of insufficiency. The HBA Residential did not demonstrate an insufficiency for Residential in Hamilton, whereas the HBA Business for Industrial land did.

Fast Track changed the rules of engagement and subsequent to the introduction of the Fast Track Bill and notification by the applicant of their intention to lodge an application for Fast Track scheduling, HCC initiated discussions with the applicant. This was to identify at a high-level key issue that would need resolution should the application be approved for scheduling.

What follows is a summary of the issues identified at that stage, and through the response of the Future Proof Sub-Committee when considering an earlier submission by Brymer Farms Limited on the Future Development Strategy. This response was co-ordinated amongst all Future Proof partners, including Hamilton City Council. Some of the comments are made against the version of the proposed Master Plan for the site that has been provided to HCC as part of discussions subsequent to mobilisation for Fast Track, and this is attached as Appendix one for reference.

Strategic land use pattern and strategy alignment and General Urban Form

1. The Brymer development area is not identified in the Waikato District Growth and Economic Development Strategy, the Hamilton Urban Growth Strategy, or the Waikato Regional Policy Statement.
2. We are concerned at the somewhat isolated location of the proposed retirement village as shown on the proposed Master Plan and its integration with the wide site and area, and challenges to mobility presented by the terrain on this part of the site.
3. The majority of land in the southern half of the site is difficult to develop given its stormwater and peat challenges. It is likely that expensive treatment will be required to appropriately manage these issues, or urban development avoided from this area. We are not satisfied the proposed design adequately reflects these considerable constraints. Consideration should be given to repurposing this area to a mixture of open space and stormwater management.

Geotechnical

4. There are significant Geotechnical constraints related to the presence of peat in the southern half of the site. Urban development of this part of the site will likely impose a high degree of engineering intervention and cost.

Waste Water and Water Supply

5. There is no capacity in the HCC wastewater network to support this development.
6. Existing water allocations for municipal takes cannot support additional development without reducing levels of service for other development areas.
7. Bore water abstraction is not confirmed as a viable solution given likely higher water treatment requirements compared to river water abstraction. The higher level of treatment will impose costs on development and occupants which likely have not been fully quantified and will result in pressure for connection to HCC's network.
8. Independent wastewater solutions are likely to be unsustainable in the med-long term and present maintenance and cost challenges and pressure for connection to HCC's network. HCC will not accept vesting of this type of infrastructure.
9. If stand-alone solutions for wastewater are to be pursued, detailed information is to be provided around the long term financial and environmental sustainability of such solutions.
10. In addition to the Sub-Committee's consideration, Hamilton City Council and Waikato District Council have recently agreed to establish a joint waters CCO. There are no agreements in place that the water entity will take on management of water supply and wastewater services from the developers. Developers need to be aware that they will need to comply with Taumata Arowai requirements and prepare to be a water supply authority in their own right if a connection agreement cannot be established.

Stormwater

11. There is an extensive local authority-maintained farm drainage network that will receive stormwater discharges from this development. This drainage network is critical for the downstream agricultural land uses. Adverse effects on the functioning of the drainage network will need to be addressed by the applicant.

12.Stormwater management for the southern part of the site will be challenging and will likely require integration with other landowners and require an extensive land area, reducing significantly the land left over for feasible development - so the yields may not be as high as currently anticipated by the developer.

13.The Ohote Stream and Basin also have the potential for backwater flooding from the Waipa River which can extend to downstream of the site. Detailed flood hazard assessment would need to be undertaken for the proposed development to address existing and potential future flood hazards on the site, and the effects on both proximal and far afield properties.

Transport

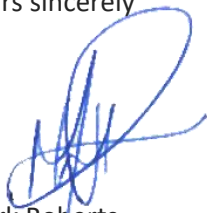
14.The West Hamilton transport network is under significant pressure from growth, with significant safety issues along SH23 and at the SH23 Dinsdale Roundabout that will be exacerbated by additional traffic.

15.NZTA has no plans to improve this part of its network but has identified the need for a West Hamilton Network Review to inform future investment activities.

16.There are no plans and no funding for high frequency bus services to support this part of the city so residents will need to rely on their own transport options in the interim.

This letter confirms that the developer has met with HCC through our Fast Track Action Team process. This response has highlighted the considerable network capacity and infrastructure challenges development of the Brymer site triggers. Resolution of these challenges will be costly, potentially rendering its financial feasibility precarious. If approved for Fast Track consenting HCC anticipates addressing all matters listed and feasibility must be at the forefront of consideration.

Yours sincerely



Mark Roberts
Acting Unit Director
Urban & Spatial Planning Unit

Appendix One



Brymer Road Development

Brymer Road
Masterplan for Future Proof

B&A
Urban & Environmental

1.1 Introduction

This presentation has been prepared to support the an area of land (the site) at 127 Brymer Road to accommodate future urban growth.

The site is located on the north western urban fringe of Hamilton City, and bounded to the south by State Highway 23 to Raglan. To the north east, the site is bounded by Brymer Road and the Hamilton City boundary to the east.

The site is located within the jurisdiction of the Waikato District Council (**WDC**) and to the west of Hamilton City, just outside of Grandview Heights and Western Heights. The land is currently zoned Rural within the Waikato District Plan with the land to the east and within the Hamilton city area, is zoned residential.

The site is made up of 5 lots of land ranging in size from 677m² through to 57.917ha. the combined land area for the 5 lots is approximately 80.993ha. A drain splits the combined site into two areas to the north and south as it aligns east to west through the middle of the site and bounding part of the site to the south.

The site presents an opportunity for additional housing on the edge of the Hamilton City / Waikato District boundary to support the growth of Hamilton. These adjoining lots present some challenges however as further described in this report, there are opportunities to create unique and accessible neighbourhoods too.



1.2 Site Images

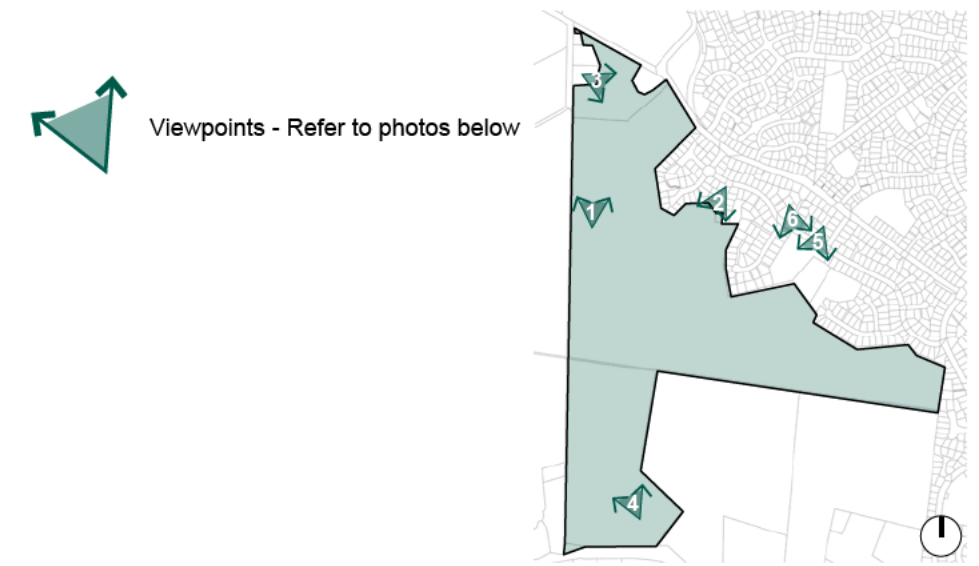


Photo 1 - Kanuka stand



Photo 3 - Looking south east from Obrien Road



Photo 5 - Looking south from within Te Kootii Park



Photo 2 - Looking west into the site from end of Harrogate Place



Photo 4 - Looking north into the site from SH 23



Photo 6 - Te Kootii Park playground

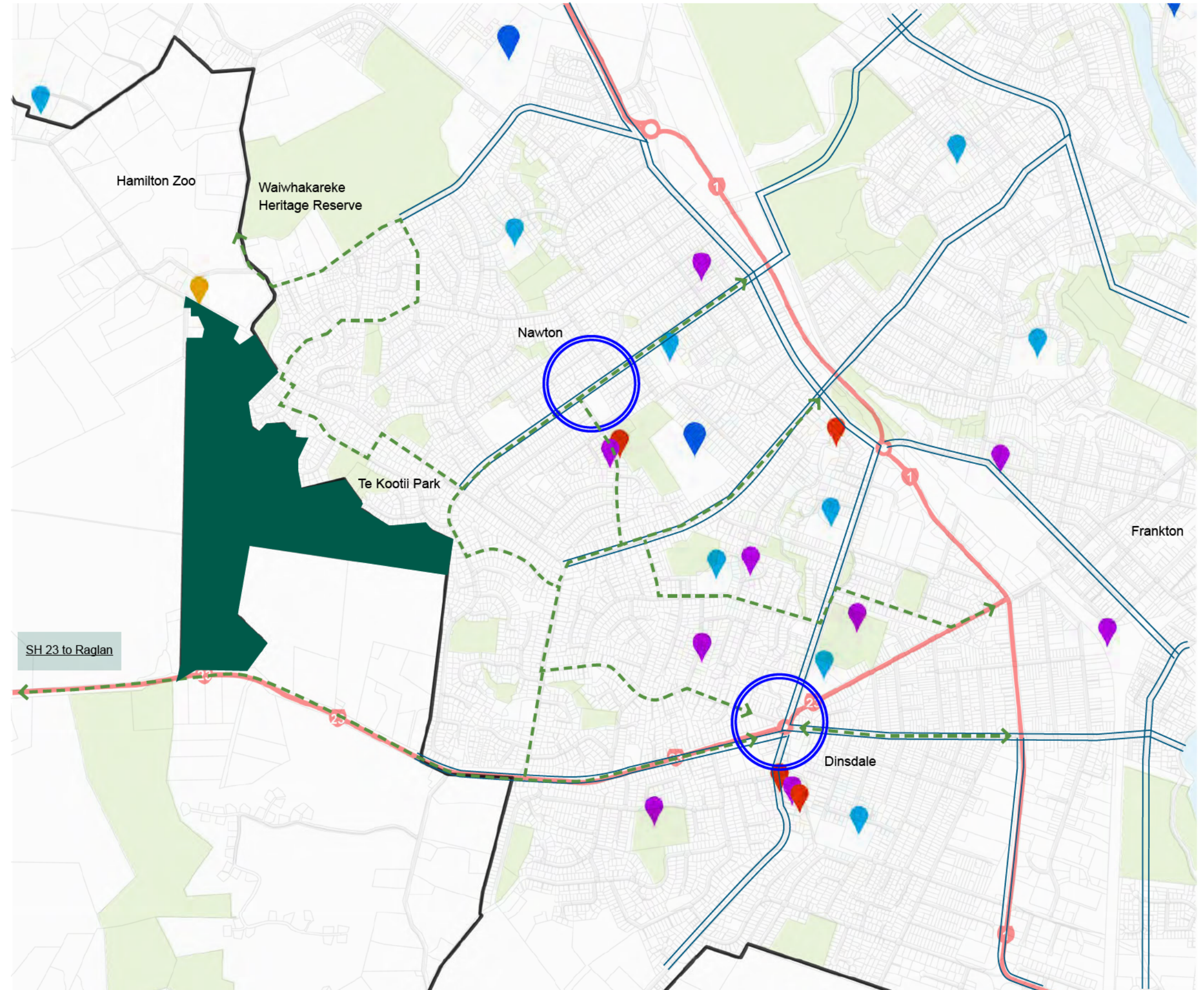
1.3 Local Site Context

The site is surrounded by a wide range of open spaces such as the Waiwhakareke Heritage Reserve, Hamilton Zoo and Te Kootii Park.

Te Kootii Park adjoins the site to the east and is located at the edge of the Hamilton City / Waikato District boundary. The park has a cricket pitch / playground and a large 'kick around' space. The park also provides a direct cycle and pedestrian link to bus stops and the cycleway route that connects to the amenities, job opportunities and schools around Nawton and Dinsdale.

Legend

-  The site
-  Open space
-  Supermarket / Superette
-  Medical - GP
-  Hamilton Zoo
-  Primary / Intermediate School
-  High School
-  Bus route
-  Cycleway
-  State Highway
-  Hamilton City / Waikato District boundary
-  Centre

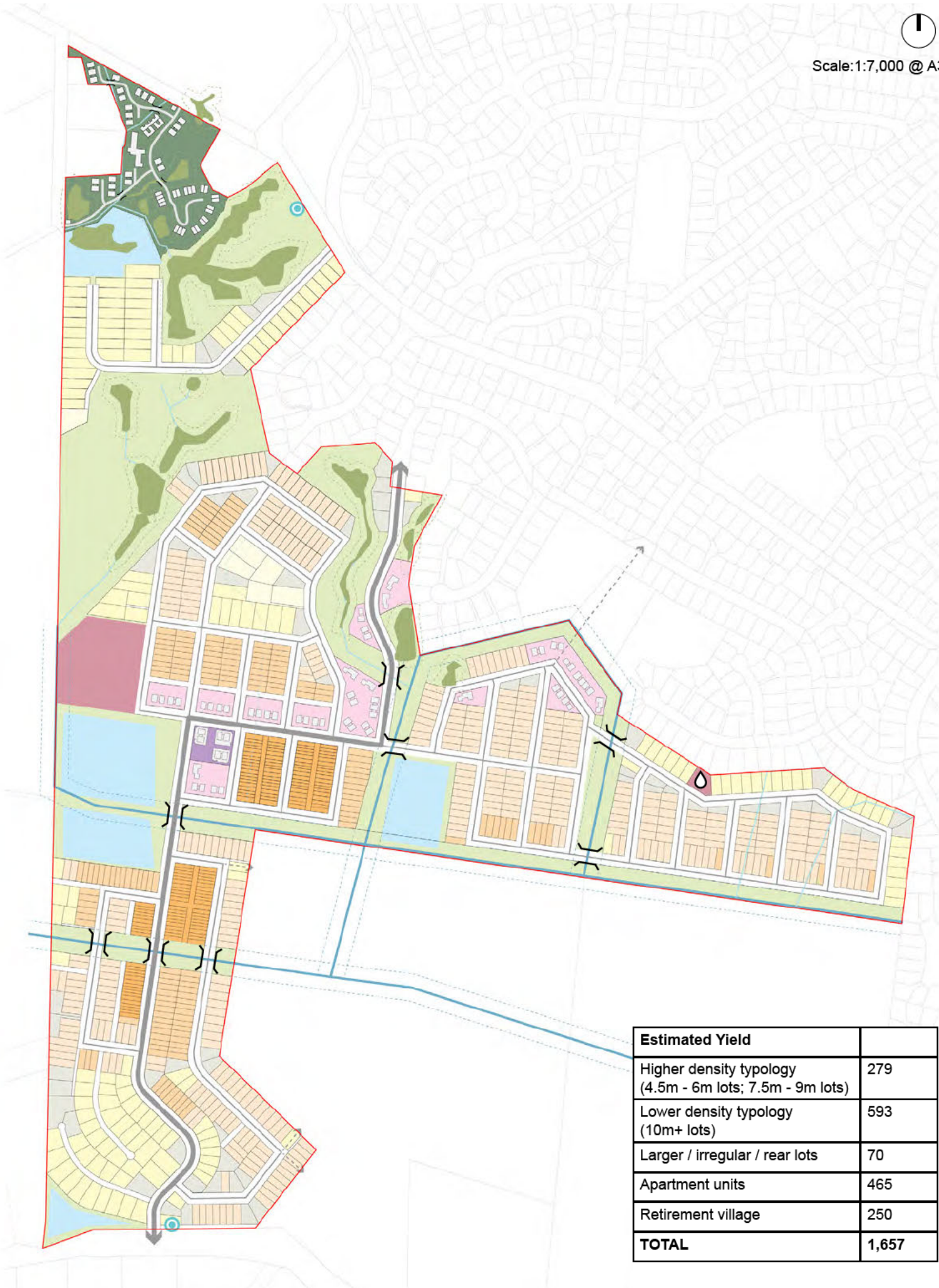


1.4 High-level Masterplan*

* This masterplan document represents a high-level conceptual layout only. The proposed site layout, estimated yield, typologies, and land uses illustrated herein are indicative and are subject to further adjustments upon comprehensive technical investigations and detailed design processes, including but not limited to engineering, ecological assessment, geotechnical analysis, and hydrological studies.

Legend

- Apartment Blocks
- Higher Density with Rear Lanes - Terrace Housing (4.5m - 6m lot typology)
- Higher Density - Duplex / Terraces (7.5m - 9m lot typology)
- Lower Density - Duplex / Detached (10m - 12m lot typology)
- Lower Density - Detached (12m+ lot typology)
- Larger Lot Residential (1000m² and above)
- Irregular Shaped / Rear Lots
- Retirement Village - Villa terrace, apartment units, amenity building (approx. 3.4ha)
- Mixed-use with apartment units above / Neighbourhood Centre (approx. 0.3ha)
- Proposed Open Spaces / Riparian / Native Revegetation Areas
- Existing Water Bores
- Proposed Pump Station
- Proposed Wastewater Discharge and Treatment Area
- Proposed Stormwater Ponds (shapes to be confirmed at future design stages)
- Existing Key Drains (as identified through Waikato Regional Council GIS mapping)
- Existing Waterway
- Existing Wetlands To Be Retained and Revegetation (include 10m buffer areas)
- Proposed Main Road (~20m)
- Proposed Local Road (~16.8m)
- Proposed Bridge or Culvert
- Connections to Existing Street Network
- Possible Future Road Connections



Estimated Yield	
Higher density typology (4.5m - 6m lots; 7.5m - 9m lots)	279
Lower density typology (10m+ lots)	593
Larger / irregular / rear lots	70
Apartment units	465
Retirement village	250
TOTAL	1,657

1.4.1 Transport and Accessibility

Accessibility to the site is currently limited and presents several key constraints:

- Brymer Road and State Highway 23 currently provide limited vehicular access points into the site, potentially restricting future development access unless additional points are established.
- Existing pedestrian and cycle infrastructure within nearby Te Kootii Park and Hamilton's urban network provides potential integration points for active transport, yet currently lacks direct connectivity to the site.
- The potential for a new vehicular and pedestrian linkage through Te Kootii Park is identified, pending approval through Hamilton City Council's Reserve Management Plan.

Legend

-  Main Road with On-road Cycle Facility
-  Key Local Road
-  Possible Road Connections Dependent On Further Discussions
-  Intersection / Connection Points to Existing Roading Network
-  Bridge / Culvert
-  Pathways and Boardwalks



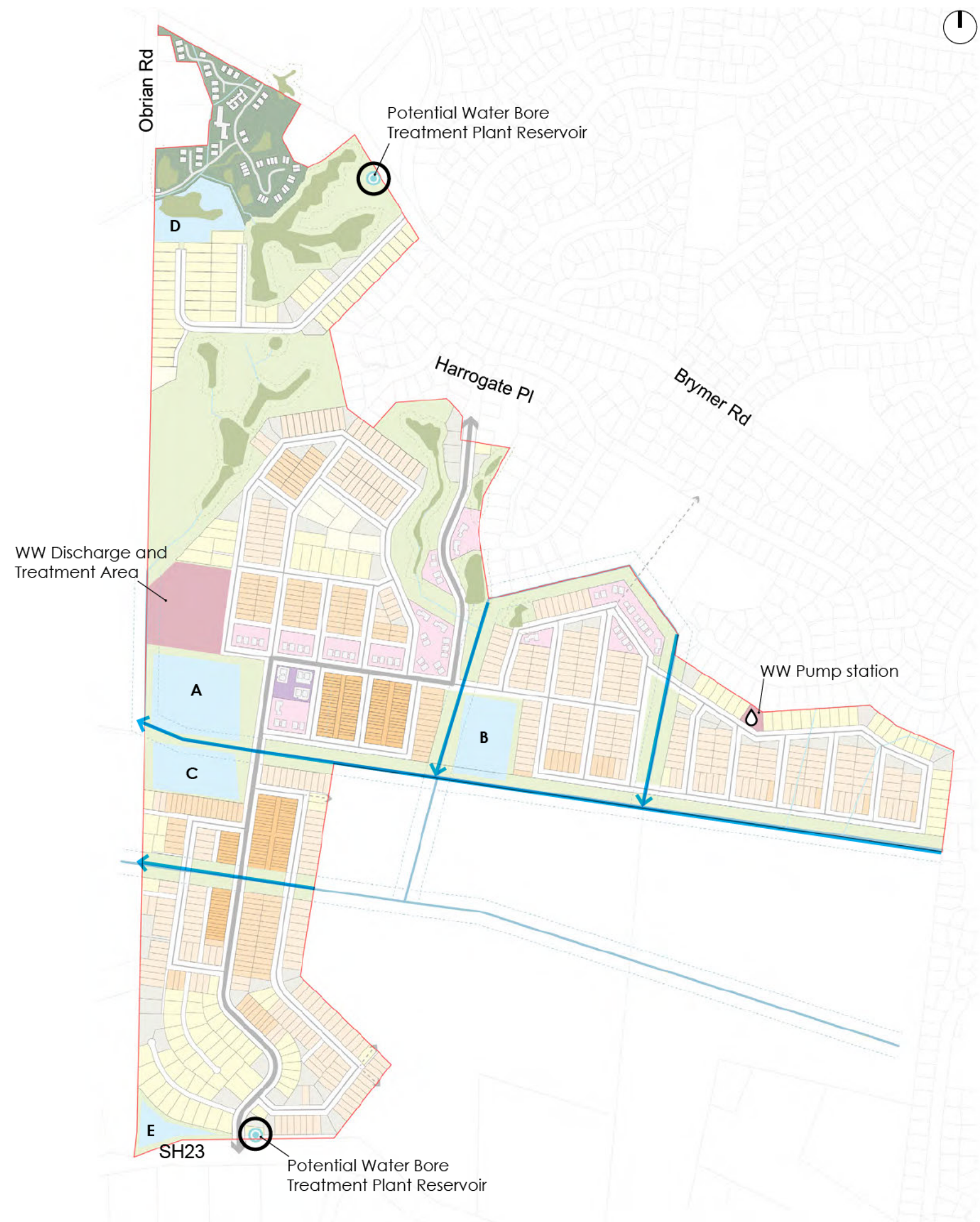
1.4.2 Three Waters Infrastructure

Infrastructure Servicing and Assumptions

- There are existing ponds on site which must be preserved and enhanced. New stormwater management features (ponds and wetlands) are proposed but will require detailed hydrological and engineering assessments to confirm their location, size, and efficacy.
- Management of stormwater discharges into the Waikato Central Drainage Scheme requires assumptions around capacity and infrastructure upgrades. Detailed discussions with council infrastructure teams will be necessary to validate these assumptions.
- For Wastewater and water infrastructure, the masterplan proposes onsite Membrane Bioreactor (MBR) wastewater treatment plants and local water supply systems. It assumes that these private infrastructures will be viable solutions acceptable to regulatory authorities.
- Infrastructure provision, including wastewater, stormwater, water supply, and road networks, is assumed to occur through a staged development approach, subject to detailed design, funding, and regulatory approvals.

Legend

- Existing Key Drains (as identified through Waikato Regional Council GIS mapping)
- Stormwater Ponds (shapes and sizes to be determined depending on further investigations)
 - A = approx. 1.6ha,
 - B = approx. 1ha,
 - C = approx. 0.95ha
 - D = approx. 1ha
 - E = approx. 0.3ha
- WW Discharge and Treatment Area (approx. 1.5ha)
- WW Pump Station
- Water Bores



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

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

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

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

2. Please provide your comments on this application
NZTA thanks the Minister for the opportunity to comment on the referral of this application into the fast-track approvals process. NZTA has had pre-application engagement with the applicant regarding this project in late 2024. This consisted of a discussion with the applicant's consultant and a NZTA representative. The information provided at the time was also assessed by internal NZTA subject matter experts, who noted that necessary improvements were to be investigated at the intersection with State Highway 23. As per the matters set out in the invitation to comment, NZTA provides the following commentary: <i>Are there any matters that may adversely affect delivery of the project?</i> NZTA would need to see the substantive application to be able to determine actual impacts on the state highway network, however developments of this nature usually impact the network through increased heavy vehicle movements during site development and construction, and a sustained increase in traffic volumes at the completion of the development. As part of the initial stages of the proposal, the development proposes a priority t-intersection with a right turn bay on State Highway 23. NZTA considers that this will need to be designed

[UNCLASSIFIED]

for the existing 100km/h posted speed limit. The NZTA Planning Policy Manual Appendix 5B Diagram A requires 282m of sight distance in both directions for a 100km/h posted speed limit, and this does not appear to be available at the location of the proposed priority t-intersection in either direction. The developer would be required to work with NZTA to determine appropriate mitigation and management of any intersection with the state highway.

The priority T-intersection is anticipated to be upgraded as signalised as the development progresses. NZTA does not generally support the installation of signalised intersections in high-speed environments due to the risk of high severity crashes from red light running or rear end collisions. A well-designed roundabout will be safer than a signalised intersection on State Highway 23 as roundabouts have fewer conflict points compared to signalised intersections.

NZTA would expect to see a comprehensive Integrated Transport Assessment prepared, along with a construction management plan, Safe System Audit, and mitigation measures to address any adverse effects on the state highway resulting from this development.

The development should also allow for future road connections from the site to the boundary of the adjacent property titles to provide for future connectivity.

Therefore, based on the information provided, NZTA has no concerns with this project, Brymer Farms Limited, being referred into the fast-track approvals process.

NZTA would welcome the opportunity to provide comments on any substantive application in due course.

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

Managers signoff

Nicola Foran

Date: 24.07.2025

[UNCLASSIFIED]