

Planning Attachment 7 – Objectives and Policies Assessment

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1.0 Overview

The national direction instruments objectives and policies assessment has been completed for the full Brymer substantive fast track application, including all key components of the proposal such as residential development, neighbourhood centre, infrastructure, and open space. The assessment focuses on relevant national direction and, in particular, the applicable objectives and policies. Where full national direction instruments or specific objectives and policies have not been addressed, this reflects their lack of relevance to the proposal. Likewise, only those objectives and policies of the Waikato Regional Policy Statement (WRPS), Waikato Regional Plan (WRP), Waikato District Plan Operative in Part (WDP-OiP), and Waikato District Plan Operative (WDP) considered relevant to the Brymer proposal have been assessed. Objectives and policies not addressed in this assessment have been deemed not relevant to the proposal and are therefore not discussed further.

Further detail, including broader commentary and assessment, is provided in **Volume 2** of the AEE.

2.0 National Policy Statements

National Policy Statement for Freshwater Management 2020

Objective / Policy	Comment
Objective: The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises: (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.	The proposal appropriately responds and gives effect to the Objective of the NPS-FM and the hierarchy of obligations. In relation to the first priority, the Brymer development incorporates a comprehensive freshwater and stormwater management response that prioritises the health and well-being of water bodies and freshwater ecosystems. The Site contains a network of wetlands, watercourses and artificial drains that ultimately connect to the Ohote Stream and wider Waikato River catchment. The existing freshwater environment is highly modified, with artificial drains assessed as having negligible ecological value and modified watercourses generally having low ecological value. The Ecological Impact Assessment (refer to Appendix 23) identifies that the Project will result in the loss of approximately 0.51 ha of modified wetland and

Objective / Policy	Comment
	133 m of modified ephemeral watercourse, together with modification of other watercourses through culverting. The effects management hierarchy has been applied to these effects. Where effects cannot practicably be avoided, the proposal includes restoration and enhancement of retained wetlands and streams, creation of new wetland and stream habitat, extensive native riparian planting, improved fish passage and measures to maintain wetland hydrology. Importantly, the proposed compensation and restoration package is anticipated to result in an overall net positive outcome for wetland and stream extent and values, including restoration of existing degraded wetlands and creation of additional wetland habitat. The Stormwater Management Plan (refer to Appendix 14) further prioritises freshwater health through an integrated treatment train comprising on-lot retention and soakage, sediment forebays, constructed wetlands, extended detention, attenuation and controlled discharge. These measures manage both stormwater quality and quantity, maintain groundwater recharge where practicable and manage post-development flows to reduce downstream erosion, flooding and water quality effects. The stormwater network has also been designed to redirect treated stormwater to the upper reaches of retained wetlands and streams where development would otherwise reduce groundwater recharge and baseflows. The Groundwater Assessment (refer to Appendix 20) confirms that effects associated with dewatering and stormwater wetlands will be localised and appropriately managed. Collectively, these measures demonstrate that the ecological integrity and health of freshwater systems has been afforded first priority. In relation to the second priority, the health needs of people will be supported through appropriately designed and resilient potable water, wastewater and stormwater infrastructure. Water supply infrastructure will meet the relevant

Objective / Policy	Comment
	RITS standards for potable water supply, while wastewater will be collected and conveyed through the reticulated network. This provides for the health and safety of future residents while ensuring that servicing of the development does not take precedence over the protection and management of freshwater health. In relation to the third priority, the proposal will enable approximately 1,043 new homes across a range of housing typologies, together with supporting open space, recreation opportunities, neighbourhood facilities, transport connections and infrastructure. This will make a substantial contribution to identified housing demand and provide for the social and economic well-being of people and communities, both now and into the future. The Project also provides for cultural well-being through recognition of the Site's relationship with the Ohote Stream and Waikato River catchment and ongoing involvement of Ngāti Māhanga as mana whenua, including through cultural monitoring, ecological restoration and environmental management. The CIA (refer to Appendix 24) recognises the interconnected nature of the Site's wetlands, groundwater and waterways and the importance of protecting their mauri and ecological function. The wider proposal therefore enables significant social, economic and cultural benefits while ensuring those outcomes are pursued within, rather than ahead of, the first and second priorities of Te Mana o te Wai. Accordingly, while the Project will modify some existing freshwater features, the comprehensive freshwater, stormwater and ecological response prioritises the health and well-being of freshwater systems first, provides for the health needs of people second, and then enables people and communities

Objective / Policy	Comment
	to provide for their social, economic and cultural well-being. The proposal is therefore considered consistent with the Objective of the NPS-FM.
Policy 1 Freshwater is managed in a way that gives effect to Te Mana o te Wai.	Te Mana o te Wai is a concept that refers to the fundamental importance of water and recognises that protecting the health of freshwater bodies protects the health and well-being of the wider environment. The Brymer development has been carefully designed and planned to embody the principles of Te Mana o te Wai through integrated land and water management, ecological restoration and cultural engagement. This is particularly important given that the Site is located within the upper Ohote Stream catchment and contains wetlands, groundwater systems and drainage corridors that form part of a connected hydrological system ultimately associated with the Waikato River. The Project has sought to protect and enhance the health of waterbodies and, ultimately, the Waikato River through: • Restoration and enhancement of freshwater habitat, including restoration of existing degraded wetlands and streams, creation of additional wetland and stream habitat, and extensive native riparian planting. The EclA (refer to Appendix 23) concludes that the proposed compensation package will result in an overall net positive outcome for streams and wetlands. • An integrated stormwater treatment train, incorporating on-lot retention and soakage, pre-treatment, artificial wetlands, extended detention and attenuation before controlled discharge to the receiving environment. • Managing stormwater quantity and downstream effects, including attenuation of post-development flows, preservation of existing flow

Objective / Policy	Comment
	paths and discharge locations and management of upstream catchment flows so that downstream flooding and erosion effects are not worsened. • Maintaining freshwater hydrology and groundwater recharge, including on-site soakage and the redirection of treated stormwater to the upper reaches of retained wetlands and streams where development would otherwise reduce groundwater recharge and baseflows. • Managing construction related water quality effects through erosion and sediment controls, progressive stabilisation and other measures designed to minimise sediment entering wetlands, watercourses and the downstream receiving environment. • Improving ecological function and connectivity, including stream restoration, riparian planting, improved fish passage and management of native fish during works. The existing artificial drains and modified watercourses are generally of negligible to low ecological value, providing an opportunity for the proposed restoration measures to improve freshwater values over time. • Recognising mana whenua values and kaitiakitanga through engagement with Ngāti Māhanga and provision for their ongoing involvement in matters affecting water, including cultural monitoring and ecological restoration. The CIA (refer to Appendix24) emphasises that groundwater, wetlands, drains and streams are interconnected and that development within the catchment should avoid further degradation and support measurable restoration outcomes. • Providing planted buffers around freshwater features, including riparian planting zones along wetland margins, watercourse corridors and stormwater areas. These planted margins provide physical separation

Objective / Policy	Comment
	between development and freshwater environments, while supporting water quality, ecological connectivity and habitat values and helping to protect and enhance the functioning of the Site's wider freshwater network. The proposed riparian and buffer planting also forms part of the integrated blue-green network and will improve the condition and resilience of water-focused areas that are presently highly modified and generally lack riparian vegetation. • Long-term monitoring and adaptive management – The development includes commitments to ongoing monitoring of groundwater, water quality and wetland health, consistent with an adaptive management approach. Wetland monitoring will be undertaken by a suitably qualified ecologist to confirm that retained wetlands are not degraded and to monitor the ongoing performance of constructed wetland habitat, with monitoring information relating to groundwater, water quality and wetland health provided to Ngāti Māhanga at agreed intervals. This provides a framework for environmental outcomes to be verified over time and for management responses to be adapted where necessary, supporting the maintenance and progressive enhancement of water body health and the intergenerational stewardship values at the heart of Te Mana o te Wai. Accordingly, while the development necessarily involves modification of some existing freshwater features, the Project applies the effects management hierarchy and embeds water quality protection, hydrological management, freshwater restoration and mana whenua involvement into its design and implementation. The resulting net positive outcomes for wetland and stream values support the health and well-being of the wider catchment and,

Objective / Policy	Comment
	ultimately, the Waikato River. The proposal is therefore considered consistent with Policy 1 and gives effect to Te Mana o te Wai.
Policy 2 Tangata whenua are actively involved in freshwater management (including decision making processes), and Māori freshwater values are identified and provided for.	Tangata whenua, including Ngāti Māhanga and Waikato-Tainui, have been actively engaged throughout the development of the Project prior to lodgement of the substantive application, with ongoing engagement and collaboration proposed as the Project progresses. This engagement has enabled tangata whenua values and perspectives relating to freshwater to inform the development and refinement of the proposal. The Cultural Impact Assessment (CIA) (refer to Appendix 24) prepared by Ngāti Māhanga provides an independent assessment of cultural effects, mitigation expectations and the ongoing involvement sought by mana whenua in the Project. Importantly, the CIA recognises that the Site's wetlands, groundwater and connected waterways form part of a broader ecological and cultural network extending across the catchment, and identifies the importance of carefully managing these systems to protect their mauri and ecological function. These values have informed the Project's approach to freshwater management, including stormwater treatment and attenuation, wetland protection and enhancement, ecological restoration, riparian planting and the management of effects on downstream receiving environments. The proposal also provides for continued tangata whenua involvement through cultural monitoring, ecological restoration, adaptive management and ongoing monitoring of groundwater, water quality and wetland health, supporting an enduring role for mana whenua in environmental management as the Project is implemented. Accordingly, the Project has not treated tangata whenua engagement as a discrete consultation exercise. Rather, Māori freshwater values have been

Objective / Policy	Comment
	identified through direct engagement and the CIA and incorporated into the freshwater management response, with provision for ongoing mana whenua participation as the Project progresses. The proposal is therefore considered consistent with Policy 2 of the NPS-FM.
Policy 3 Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.	The proposed Brymer development is considered consistent with Policy 3, as freshwater has been managed through an integrated approach that considers the relationship between land use, stormwater, groundwater, wetlands, watercourses and downstream receiving environments. The Site is located within the upper Ohote Stream catchment and contains wetlands, groundwater systems and modified drainage networks that form part of a connected hydrological system extending to the Ohote Stream and wider Waikato River catchment. The CIA (refer to Appendix 24) specifically recognises the need to consider these interconnected freshwater systems and to avoid cumulative degradation across the wider catchment. The Stormwater Management Plan (SMP) (refer to Appendix 14) adopts a catchment-based approach that considers both runoff generated by the development and significant external upstream catchment flows passing through the Site. Existing drainage corridors and hydraulic connectivity are retained where practicable, with the stormwater system incorporating on-lot retention and soakage, forebays, constructed wetlands, attenuation, flood storage and controlled discharge. The treatment train manages stormwater at multiple stages before discharge, addressing water quality, water quantity and flood effects on the downstream receiving environment. Modelling also demonstrates substantial attenuation of post-development runoff before it enters the existing drainage network.

Objective / Policy	Comment
	The integrated approach extends to the relationship between groundwater, surface water and wetland hydrology. Where development would reduce groundwater recharge and potential baseflows to retained wetlands, the stormwater network has been redesigned to redirect treated stormwater to the upper reaches of wetlands and streams. This is complemented by wetland and stream restoration, riparian and buffer planting, ecological enhancement and ongoing monitoring and adaptive management. In addition, the Project's approach to waterways, wetland restoration, planting and ecological connectivity has been informed by mana whenua values and mātauranga Māori, helping to ensure that the cultural significance, mauri and interconnected nature of freshwater systems are recognised and provided for as part of the wider catchment response. The CIA recognises that natural wetlands and connected waterways form part of a broader ecological and cultural network extending across the catchment and require careful management to protect their mauri and ecological function. Accordingly, the Project considers freshwater effects beyond the Site boundary, recognising the Site as part of the wider Ohote Stream and Waikato River catchment and managing the effects of urbanisation on both upstream flows and downstream receiving environments. Through the integrated stormwater, groundwater and ecological response, together with ecological restoration, monitoring and recognition of mana whenua values, the proposal adopts a whole-of-catchment approach to freshwater management and is therefore considered consistent with Policy 3 of the NPS-FM.
Policy 4 Freshwater is managed as part of New Zealand's integrated response to climate change.	The proposed Brymer development is considered consistent with Policy 4, as freshwater management forms part of the Project's wider response to climate change through climate-resilient infrastructure, nature-based stormwater

Objective / Policy	Comment
	solutions, ecological restoration and an urban form that supports more sustainable transport choices. The SMP and Infrastructure Report (refer to Appendix 14) specifically incorporate climate change into the stormwater design, including management of flows up to the 100-year ARI storm event including climate change. Artificial wetlands provide treatment, detention and attenuation, with post-development peak discharges generally limited to no more than 80% of pre-development flows, reducing downstream flooding risk and improving resilience to future rainfall events. The stormwater response also incorporates nature-based solutions, including on-lot soakage, constructed wetlands, landscaped drainage corridors, riparian planting and enhancement of existing drainage corridors. Wetland creation and restoration provide both ecological habitat and stormwater treatment and attenuation functions, while indigenous riparian planting will improve water quality, reduce erosion and strengthen ecological connectivity and resilience. The wider masterplan further supports climate resilience through a connected and less car-dependent urban form. The neighbourhood centre will provide local services and amenities within the development, supported by connected walking and cycling networks and provision for public transport, providing alternatives to private vehicle travel and reducing the need for residents to travel outside the neighbourhood for everyday needs. Overall, the integration of climate-resilient stormwater infrastructure, nature-based freshwater management, native planting and more sustainable transport choices demonstrates that freshwater is being managed as part of

Objective / Policy	Comment
	the Project's broader response to climate change. The proposal is therefore considered consistent with Policy 4 of the NPS-FM.
Policy 5 Freshwater is managed (including through a National Objectives Framework) to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.	The proposed Brymer freshwater management response seeks to improve the health and well-being of the Site's existing degraded freshwater systems while maintaining and enhancing retained water bodies. The Site forms part of the upper Ohote Stream catchment and contains a highly modified freshwater environment, including approximately 9.2 km of artificial drains, modified watercourses and wetlands affected by historic agricultural drainage and land modification. The LVA (refer to Appendix 12) similarly identifies limited riparian vegetation, compromised habitat, shading and bank stability, and existing opportunities for ecological restoration and enhancement. The EclA (refer to Appendix 23) applies the effects management hierarchy to freshwater effects. While the Project will result in some unavoidable wetland and watercourse loss and modification, residual effects are addressed through wetland and stream creation, restoration and enhancement, indigenous riparian planting and improved ecological connectivity. Approximately 0.76 ha of new wetland habitat is proposed, together with restoration and enhancement of existing degraded wetlands. The EclA concludes that these measures are expected to result in an overall net positive outcome for wetland and stream values. These ecological measures are reinforced by the proposed stormwater treatment train, incorporating on-lot retention and soakage, sediment forebays, constructed wetlands, extended detention and controlled discharge. This integrated system manages water quality and quantity and reduces potential effects on downstream receiving environments. Riparian enhancement and indigenous replanting will further improve freshwater

Objective / Policy	Comment
	health by stabilising stream banks, reducing erosion, providing shading and improving habitat quality and ecological connectivity. Retained wetlands and watercourses are also protected through riparian and buffer planting and integration within the wider blue-green network, while treated stormwater is redirected where necessary to maintain wetland hydrology and baseflows. Accordingly, the proposal provides for degraded freshwater systems to be restored and improved, while the health and well-being of retained water bodies and freshwater ecosystems is maintained and enhanced. Collectively, the restoration and creation of freshwater habitat, riparian enhancement, stormwater treatment and hydrological management, together with the anticipated net positive outcome for wetland and stream values, are considered consistent with the intent of Policy 5 of the NPS-FM.
Policy 6 There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.	The Project has proactively addressed the presence of natural inland wetlands, with potential wetland areas identified and mapped early in the design and assessment process to inform the development layout and freshwater response. The EclA (refer to Appendix 23) confirms the presence of a number of natural inland wetlands across the Site, which are generally highly modified and dominated by exotic vegetation as a result of historic drainage and grazing. It is recognised that the Project will result in the loss of some existing natural inland wetland habitat. The Site contains a network of highly modified natural inland wetlands, predominantly comprising exotic grasses, herbs and rushes and affected by historic drainage and grazing. The EclA (refer to Appendix 23) identifies approximately 0.514 ha of wetland habitat that will be removed, with the affected wetlands assessed as having moderate ecological value.

Objective / Policy	Comment
	The effects management hierarchy has been applied to the Project, with natural wetlands retained and restored where practicable. Approximately 1.2 ha of retained wetlands will be restored through removal of grazing, native planting, weed and animal pest control and the establishment of planted buffers. These measures are expected to improve the ecological condition, habitat values and long-term resilience of wetlands that are presently degraded. Changes in catchment hydrology have also been specifically addressed, with treated stormwater redirected to the upper reaches of retained wetlands where necessary to maintain recharge and baseflows. Where wetland loss cannot practicably be avoided, the proposal provides a comprehensive compensation package including the creation of more than 0.75 ha of new wetland habitat, together with restoration of retained wetlands. The new wetland has been located and designed having regard to appropriate hydrology, ecological connectivity and integration with existing vegetation and stormwater treatment areas. Importantly, the EclA confirms that the proposed wetland creation will ensure no net loss of wetland extent within the Site and, when combined with restoration, is expected to achieve a 13.2% net positive outcome for wetland values. The restored wetlands are also proposed to be legally protected in perpetuity. Accordingly, while the Project involves some direct loss of existing natural inland wetlands and is therefore not directly consistent with the first limb of Policy 6, the proposal has applied the effects management hierarchy and provides substantial wetland creation, restoration, enhancement and long-term protection. Overall wetland extent will be maintained and ecological values are expected to achieve a net positive outcome. On balance, the proposal is therefore considered to generally align with the broader intent of

Objective / Policy	Comment
	Policy 6 by protecting and improving retained wetland values and actively promoting wetland restoration.
Policy 7 The loss of river extent and values is avoided to the extent practicable.	Policy 7 is relevant to the Brymer development, as the Project will result in some loss and modification of watercourses that fall within the freshwater assessment. The EclA (refer to Appendix 23) identifies the proposed loss of approximately 133 m of modified ephemeral watercourse (W2a), together with modification of modified perennial and ephemeral watercourses through culverting and rock rip-rap. The affected W2a watercourse has a low SEV score and poor ecological function and values, with the unmitigated overall ecological effect of its loss assessed as low. The Project has sought to avoid the loss of river extent and values to the extent practicable through the comprehensive design process and application of the effects management hierarchy. The EclA identifies that the loss of W2a is associated with the Harrogate roading connection, which is required to establish an integrated transport network and contribute to a well-functioning urban environment. Where watercourse modification is required, effects are minimised through measures including culvert design that provides for fish passage, implementation of a Fish Management Plan (FMP), riparian restoration and stormwater treatment to protect downstream water quality. Where loss cannot practicably be avoided, residual effects are addressed through a comprehensive stream compensation package. This includes creation of approximately 134 m of new ephemeral stream channel, ensuring no net loss of stream extent within the Site, together with restoration and indigenous riparian planting of existing modified watercourses. The EclA concludes that the stream compensation package is expected to achieve a

Objective / Policy	Comment
	47.6% net positive outcome for stream ecological values, with net positive effects projected from Stage 1. Accordingly, while some loss and modification of existing watercourses cannot practicably be avoided, the affected features are highly modified and of low ecological value, and the proposal provides for equivalent stream creation together with substantial restoration and enhancement of retained watercourses. Overall, the Project achieves no net loss of stream extent and a net positive outcome for stream values, and is therefore considered to appropriately respond to the intent of Policy 7.
Policy 8 The significant values of outstanding water bodies are protected.	Policy 8 is of limited direct relevance to the Brymer development, as the specialist assessments do not identify any outstanding water body within the Site, nor any outstanding water body that would be directly affected by the Project. The Site instead contains a highly modified freshwater environment comprising natural wetlands, modified watercourses and artificial drainage channels within the upper Ohote Stream catchment. Notwithstanding this, the Site forms part of a connected hydrological system within the Waikato River catchment, and the cultural and ecological significance of the wider Waikato River is recognised throughout the Project. The CIA (refer to Appendix 24) identifies the Waikato River and its catchment as subject to Te Ture Whaimana, with its overarching purpose being to restore and protect the health and wellbeing of the River for present and future generations. The Project responds to this wider receiving environment through integrated stormwater treatment, groundwater management, wetland and stream restoration, indigenous planting, ecological enhancement and long-term

Objective / Policy	Comment
	monitoring. These measures seek to maintain hydrological function, improve water quality and ecological values, and avoid incremental degradation of the downstream Ohote Stream and wider Waikato River catchment. Accordingly, while Policy 8 is not directly engaged because no outstanding water body has been identified within or directly affected by the Site, the Project appropriately recognises and protects the significant freshwater values of the wider receiving environment. The proposal is therefore considered not inconsistent with Policy 8 of the NPS-FM.
Policy 9 The habitats of indigenous freshwater species are protected.	The proposed Brymer development includes a comprehensive suite of measures to protect, restore and enhance habitat for indigenous freshwater species. The EclA (refer to Appendix 23) confirms that the wider Ohote Stream catchment supports a range of indigenous freshwater fish, including longfin and shortfin eel (tuna), giant and banded kōkopu, īnanga, common bully, black mudfish and common smelt. Site specific eDNA surveys detected longfin and shortfin eel, although the existing artificial drains and modified watercourses generally provide poor-quality aquatic habitat due to poor water quality, limited cover and shelter and potential downstream barriers to migration. While development will result in the removal and modification of some existing aquatic habitat, the effects management hierarchy has been applied and specific measures are proposed to protect indigenous freshwater fauna. These include implementation of a Fish Management Plan (FMP) (refer to Appendix 23) to manage fish capture and relocation during works, together with culverts designed in accordance with applicable fish passage requirements and the New Zealand Fish Passage Guidelines to maintain connectivity through the freshwater network. Following implementation of

Objective / Policy	Comment
	the fish relocation measures, the EclA assesses the residual effect of direct habitat removal on native fish as low. Importantly, the Project also provides substantial habitat enhancement through restoration and indigenous riparian planting of retained watercourses and wetlands, creation of new wetland and stream habitat, and enhancement of retained artificial drains. These measures will improve shading, aquatic habitat quality and ecological connectivity, with the EclA anticipating an overall net positive outcome for stream and wetland values. The CIA (refer to Appendix 24) also recognises the Site's wetlands and modified drainage corridors as habitat for taonga species and supports fish passage and species management where the long-term functionality of those measures is maintained and monitored. Accordingly, although some existing aquatic habitat will be modified, the Project provides for the protection, restoration and enhancement of indigenous freshwater species habitat, together with fish relocation, passage and connectivity measures. The resulting improvement in the quality and extent of freshwater habitat is considered consistent with Policy 9 of the NPS-FM.
Policy 11 Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided.	Water supply for the development has been specifically considered through a separate resource consent process, and Waikato Regional Council has granted Water Permit AUTH148775.01.01 to take surface water from the Waikato River for municipal supply purposes associated with the Brymer development (refer to Appendix 31). The consent authorises a maximum daily net take of 1,323 m³ and annual net take of 392,742 m³, with water to be taken through the existing HCC/IAWAI intake infrastructure.

Objective / Policy	Comment
	Importantly, Waikato Regional Council's assessment confirms that the consented take remains within the primary allocable flow of the Waikato River, with water remaining available for allocation following grant of the consent. Conditions restrict the take during low-flow conditions to protect instream environmental flow requirements and other authorised takes, and the Council concluded that cumulative adverse effects on the flow regime would be less than minor. The consent also incorporates mechanisms to promote efficient use and ongoing management, including annual demand forecasting, continuous measurement and reporting of water use, periodic review of the Water Management Plan, and the ability to review and, if necessary, reduce authorised take rates or volumes. In addition, the Groundwater Effects Assessment (refer to Appendix 20) confirms that the development is not expected to result in a measurable long-term change to the Site's overall catchment water balance. While urbanisation will alter the distribution of rainfall recharge through increased impervious surfaces and earthworks, these changes will be offset and spatially redistributed through the proposed stormwater management system. The stormwater wetlands will intercept and redirect groundwater within the Site but are not expected to materially alter the overall water budget. Where reductions in recharge could affect retained wetlands and watercourses, treated stormwater will be redirected to their upper reaches to assist in maintaining hydrological function and baseflows. Construction related groundwater abstraction associated with dewatering will also be temporary and localised, with groundwater appropriately managed during construction. The Hydrogeological Assessment (refer to Appendix 20) concludes that predicted groundwater drawdown will not affect the availability of water at nearby groundwater abstraction bores and that long-

Objective / Policy	Comment
	term groundwater diversion represents a redistribution of groundwater within the Site catchment rather than a net loss of the resource. Accordingly, the Project provides for freshwater to be allocated and used within established sustainable limits, supported by consent conditions requiring efficient use, monitoring and adaptive review. Together with the Site-specific measures to maintain groundwater recharge and hydrological function, the Project will not result in over-allocation or material depletion of freshwater resources and is therefore considered consistent with Policy 11 of the NPS-FM.
Policy 12 The national target (as set out in Appendix 3) for water quality improvement is achieved.	The national target is to increase the proportion of specified rivers and lakes that are suitable for primary contact to at least 80% by 2030 and 90% by 2040, while also seeking improvement in water quality across all categories. While the national target operates at a broader scale than the Brymer development, the Project incorporates measures that will contribute positively to water quality within the upper Ohote Stream and wider Waikato River catchment. The SMP (refer to Appendix 14) adopts a comprehensive treatment train that manages stormwater at multiple stages before discharge to the receiving environment. This includes on-lot retention and soakage, sediment forebays, constructed wetlands, extended detention, attenuation and controlled discharge. The constructed wetlands provide the primary water quality treatment function, while forebays capture sediment before stormwater enters the treatment wetlands. The system has been developed in accordance with Waikato Regional Council stormwater guidance and incorporates Water Sensitive Urban Design principles to integrate water quality, quantity and environmental outcomes.

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	Water quality outcomes are further supported through wetland and stream restoration, indigenous riparian planting and enhancement of drainage corridors, which will assist with reducing erosion and sediment inputs, stabilising banks, providing shading and improving ecological function. The Groundwater Effects Assessment (refer to Appendix 20) also anticipates that the change in land use, together with the introduction of stormwater wetlands, will reduce nutrient inputs to shallow groundwater, while construction related sediment risks will be managed through erosion and sediment controls. Long-term monitoring of groundwater, water quality, wetlands and ecological health, together with adaptive management where adverse effects are identified, will provide an ongoing framework for verifying and maintaining these outcomes. Collectively, these measures seek to improve water quality within the Site and avoid degradation of downstream receiving environments, thereby contributing at a local and catchment level towards the broader national water quality improvement target. The proposal is therefore considered consistent with the intent of Policy 12 of the NPS-FM.
Policy 13 The condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.	The proposed Brymer development incorporates monitoring and adaptive management measures to ensure that the condition of water bodies and freshwater ecosystems is monitored over time and appropriate action can be taken if adverse effects or deterioration are identified. As outlined in the EcIA (refer to Appendix 23) and associated ecological management framework, monitoring will be undertaken to assess the ongoing performance of the proposed wetland and stream restoration, enhancement and creation measures. Wetland monitoring will be undertaken by a suitably

Objective / Policy	Comment
	qualified ecologist to confirm that retained wetlands are not degraded and to monitor the ongoing performance of constructed natural wetland habitat. The Groundwater Effects Assessment (refer to Appendix 20) also establishes a groundwater monitoring framework. Four piezometers have been installed across the Site to establish baseline and seasonal groundwater conditions, with continued monitoring recommended through the pre-construction and active dewatering periods to verify predicted effects and support adaptive management should unexpected effects arise. The CIA (refer to Appendix 24) further seeks monitoring thresholds, trigger levels and adaptive management responses to maintain groundwater levels necessary to support wetland health and ecological function, together with monitoring requirements and performance standards for stormwater discharges. Accordingly, the Project provides a framework for systematic monitoring of freshwater and ecological conditions, verification of predicted effects, and responsive management where monitoring identifies adverse effects or deterioration. This will assist in ensuring freshwater health is maintained and that the Project's proposed restoration and enhancement measures achieve their intended outcomes. The proposal is therefore considered consistent with Policy 13 of the NPS-FM.
Policy 15 Communities are enabled to provide for their social, economic, and cultural wellbeing in a way that is consistent with this National Policy Statement.	The proposed Brymer development enables people and communities to provide for their social, economic and cultural wellbeing while incorporating comprehensive measures to protect and enhance freshwater values. The development will deliver approximately 1,043 residential units across a range of housing typologies and densities, together with two neighbourhood-scale mixed-use centres, public open space, recreation areas, pedestrian

Objective / Policy	Comment
	connections and supporting infrastructure. This will provide a significant supply of diverse housing adjoining Hamilton’s existing urban area and respond to identified housing demand. The Economic Assessment (refer to Appendix 30) identifies wider regional and national benefits associated with increasing housing supply and choice, improving housing affordability, supporting a well-functioning urban environment and generating economic growth and productivity. Importantly, these social and economic benefits are being delivered alongside an integrated freshwater and ecological management response. Stormwater treatment and attenuation are integrated with wetlands, watercourses and other water-sensitive design features, while the wider open-space network incorporates ecological restoration, wetland enhancement and connections to surrounding reserves. The EcIA (refer to Appendix 23) anticipates an overall net positive outcome for stream and wetland values following the proposed creation, restoration and enhancement measures. The Project also provides for cultural wellbeing through recognition of the relationship of Ngāti Māhanga with the Site’s whenua and wai and their role as kaitiaki. The CIA (refer to Appendix 24) identifies the cultural significance of the Site’s wetlands, waterways and hydrological connections to the Waikato River and provides for ongoing mana whenua involvement in environmental management. The wider Project framework also provides for Ngāti Māhanga involvement in design, ecological restoration, cultural monitoring and environmental management. Overall, Brymer enables substantial social and economic benefits through housing, local services, infrastructure and open space, while supporting cultural wellbeing and maintaining and enhancing freshwater and ecological

Objective / Policy	Comment
	values. The proposal therefore enables current and future communities to provide for their wellbeing in a manner that is consistent with the wider direction of the NPS-FM and Policy 15.

National Policy Statement on Urban Development 2020

Objective / Policy	Comment
Objective 1 New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed Brymer development is considered consistent with and supportive of Objective 1 of the NPS-UD, as it will establish a comprehensively planned urban neighbourhood that enables people and communities to provide for their social, economic and cultural wellbeing, now and into the future. The development on the edge of Hamilton City, will provide approximately 1,043 residential units across a broad range of housing typologies and densities, together with local commercial activities, an integrated movement network and an extensive open-space and blue-green network. The Site directly adjoins established Hamilton neighbourhoods and urban streets and represents a logical physical continuation of the existing urban area. The Brymer development delivers a well-functioning urban environment by providing a diverse mix of housing typologies, including apartments, terraced housing, duplexes and detached dwellings, together with neighbourhood-scale commercial activities, public open space and community amenities within a connected and walkable master-planned layout. The overall layout and design of Brymer supports social, economic and cultural wellbeing through: • Social: Brymer will provide a diverse range of housing typologies, including apartments, terraced housing, duplexes, detached dwellings and larger residential lots, enabling a range of household types, sizes and stages of life to

Barker & Associates

+64 375 0900 | admin@barker.co.nz | barker.co.nz

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	live within the neighbourhood and supporting the establishment of a diverse community. The housing pattern is integrated with public parks, recreation reserves, pedestrian and cycling connections and the wider blue-green network, providing accessible opportunities for recreation, social interaction and community connection. The masterplan deliberately locates more intensive housing in association with commercial activities, movement routes and public open spaces, while lower-intensity housing provides transitions toward surrounding interfaces. • Economic: Brymer is well located in relation to the existing Hamilton urban area and the employment, commercial and community opportunities available within it. The Site is located on Hamilton's western edge, with access via Brymer Road and SH23, and is within the wider catchment of established centres including Dinsdale, Nawton and Frankton, as well as the Hamilton City Centre and the Te Rapa business and industrial area. Within Brymer itself, the proposed neighbourhood centre will provide approximately 2,184 m² of commercial floorspace, enabling local retail, hospitality and household services and supporting local employment. The Economic Assessment (refer to Appendix 30) identifies the proposed centre as being of a scale consistent with Hamilton's other neighbourhood centres and appropriately sized for its urban-edge location. Collectively, this provides future residents with access to both local services and the wider range of employment, commercial and community opportunities available across Hamilton. • Cultural: The Site sits within the rohe of Waikato-Tainui and Ngāti Māhanga, and it is recognised that the landscape has cultural values associated with whenua and wai. Through ongoing collaboration with Waikato-Tainui and Ngāti Māhanga, these values are reflected in the integration of wetlands, watercourses, riparian planting, stormwater areas and open spaces within the

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	wider blue-green network. This provides opportunities for cultural narratives and values to be expressed through the landscape design, and for principles such as kaitiakitanga and manaakitanga to help shape the identity, character and sense of place of the future neighbourhood. The three waters infrastructure design such as sustainable stormwater management and active transport infrastructure promote health, safety, and environmental resilience. Overall, Brymer will provide a substantial addition to housing supply while delivering a well-functioning urban environment that is connected, mixed-use and provides a high level of access to services, facilities and open space. The comprehensive masterplan integrates housing diversity, local commercial activity, connected transport and active-mode networks, public and recreational open space, and a strong blue-green framework. Together, these features will enable the future community to provide for its social, economic and cultural wellbeing, as well as its health and safety, both now and into the future, while supporting Brymer's integration with Hamilton's wider urban environment. Collectively, these features ensure that Brymer meets the present and future needs of its community in line with Objective 1. This conclusion is supported by the Economic Impact Assessment included at Appendix 30 and the Urban Design Assessment (UDA) included at Appendix 10.
Objective 2 Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposed Brymer development is consistent with and supportive of Objective 2 of the NPS-UD, as it will support a more competitive land and development market by enabling the urbanisation of approximately 81 hectares of land adjoining the Hamilton City boundary. Through the proposed delivery of approximately 1,043 residential units across a range of lot sizes, densities and housing typologies, Brymer will materially increase housing capacity and broaden the range of housing choices

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	available within the Hamilton and lower Waikato housing market. The Economic Assessment (refer to Appendix 30) identifies strong ongoing housing demand across this market and projected capacity shortfalls over the medium and long term, including a potential long-term shortfall of approximately 16,700 dwellings under the High Series projections. Brymer therefore provides an additional source of development capacity that can respond to this demand and, as the development progresses, is expected to form a net addition to overall housing supply rather than simply displacing development elsewhere. The development will also broaden housing choice and price points through a mix of apartments, terraces, duplexes and detached dwellings across a range of dwelling and lot sizes. The Economic Assessment identifies that this diversity provides households with the ability to make trade-offs between dwelling size and typology, supporting a wider range of housing needs and affordability levels. The affordability assessment in the Economic Assessment indicates that up to approximately 24% of dwellings (nearly 250 dwellings) could fall within the identified Hamilton City affordability benchmark once the development is fully delivered. The staged delivery of Brymer, supported by the necessary transport and three-waters infrastructure, will enable housing capacity to be brought to market progressively in response to demand. Collectively, the release of additional developable land, substantial increase in housing capacity, diversity of housing products and contribution to more affordable housing options will increase competition and choice within the wider housing market and assist in placing downward pressure on housing prices. Accordingly, the proposal is considered to give effect to Objective 2 of the NPS-UD.
Objective 4 New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.	The proposed Brymer development is consistent with and supportive of Objective 4 of the NPS-UD, as it recognises that urban environments and their amenity values will develop and change over time in response to the changing needs of people, communities and future generations. Brymer will result in a change in the character

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	of the Site from rural land to an urban neighbourhood. However, the Site comprises approximately 81 ha directly adjoining Hamilton City's existing urban edge, and the UDA (refer to Appendix 10) identifies the proposal as a logical physical continuation of the adjoining urban area rather than an isolated development. The comprehensive masterplan enables this change to occur in a coordinated manner, integrating housing, commercial activities, transport, infrastructure, open space and the Site's environmental features. The development responds to the diverse and changing needs of the community through approximately 1,043 dwellings across a range of housing typologies, including apartments, terraces, duplexes and detached dwellings, providing for different household types, sizes and stages of life. Higher-density housing is generally located near the neighbourhood centre, public open spaces and key movement routes, while lower-intensity housing provides transitions to established residential and rural interfaces. The neighbourhood centre, public parks and recreation reserves, walking and cycling connections and integrated blue-green network will further support the changing needs and amenity expectations of the community. The street network also allows for future public transport provision, while opportunities for longer-term connections to adjoining land and the wider transport network have been retained. Importantly, Brymer will be delivered through a multi-staged development framework, allowing housing, infrastructure and supporting amenities to be progressively delivered and to respond to demand over time. Collectively, the diversity of housing, local services, connected movement network, open-space and blue-green network, together with provision for future transport connections, will establish a connected and adaptable urban neighbourhood capable of responding

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	to the changing needs of its community and future generations. Accordingly, the proposal is considered to give effect to Objective 4 of the NPS-UD.
Objective 5 Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).	The Brymer development has been informed through engagement with tangata whenua, including Ngāti Māhanga and Waikato Tainui, and ongoing engagement and collaboration will continue as the project progresses. In this respect, the proposal recognises the importance of Te Tiriti o Waitangi principles in urban planning and development outcomes, consistent with Objective 5 of the NPS-UD. The proposal incorporates a comprehensively masterplanned urban form that integrates ecological restoration areas, stormwater corridors, wetlands, open space networks and active transport connections throughout the site. These elements provide opportunities for the recognition and incorporation of cultural values, including the restoration and enhancement of freshwater and ecological environments that are significant to tangata whenua. The proposal also aligns with the broader strategic direction of integrated and coordinated urban growth identified through regional planning frameworks, while recognising the importance of tangata whenua involvement in shaping urban development outcomes. The ongoing engagement process provides opportunities for iwi perspectives, mātauranga Māori and cultural values to continue informing detailed design, landscape treatment, ecological restoration and freshwater management outcomes as the project progresses. Overall, the proposal is considered to generally align with Objective 5 of the NPS-UD by recognising and providing for ongoing tangata whenua involvement in the planning and development process and incorporating opportunities for cultural, environmental and community outcomes to be reflected within the masterplanned urban environment.

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Objective 8 New Zealand's urban environments: (a) support reductions in greenhouse gas emissions; and (b) are resilient to the current and future effects of climate change.	The proposed Brymer development is considered consistent with and supportive of Objective 8 of the NPS-UD, as the masterplan incorporates measures that support reduced greenhouse gas emissions and improve resilience to the current and future effects of climate change. From an emissions perspective, Brymer provides a relatively compact and mixed-density urban form, including apartments, terraces, duplexes and detached housing, with higher-intensity housing associated with the neighbourhood centre, public open spaces and key movement routes. The connected street network is supported by footpaths, shared paths and open-space connections, including links toward Te Kootii Park and surrounding neighbourhoods, providing practical opportunities for walking and cycling and reducing reliance on private vehicle travel for some trips. The provision of approximately 2,184 m² of neighbourhood-scale commercial activities will also enable some day-to-day needs to be met locally, while the transport network has been designed to accommodate future public transport provision. The Integrated Transport Assessment (ITA) (refer to Appendix 16), also identifies a suite of travel demand management measures to support lower emission travel behaviour, including a deliberately car-lite approach to apartment development, car-share and ride-share provision, EV charging, unbundled apartment parking, residents' travel plans, and dedicated cycle and micro-mobility parking. These measures are intended to reduce reliance on private vehicle ownership and single-occupancy vehicle trips and are recommended to be secured through conditions of consent. Collectively, these features support a more compact, connected and multimodal urban environment and therefore support reductions in transport-related greenhouse gas emissions over time. The development also incorporates a comprehensive blue-green and stormwater framework that will contribute to resilience to the current and future effects of climate change. Existing wetlands are integrated with proposed wetland offsetting and enhancement areas, stormwater devices, treatment swales, rain gardens,

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	stormwater channels and watercourses, alongside riparian and buffer planting, public parks and recreation reserves. The stormwater system has been designed to manage peak flows up to the 100 year storm event, including climate change, with artificial wetlands providing treatment, extended detention and attenuation and generally limiting post-development peak discharges to no more than 80% of pre-development flows. Existing flow paths and discharge locations are also retained where practicable to avoid increasing downstream effects. The stormwater and groundwater assessments (refer to Appendix 14) have also informed the design response, including the redirection of treated stormwater to the upper reaches of retained gully wetlands and streams where development would otherwise reduce groundwater recharge and baseflows. This integrated approach will assist in maintaining the hydrological function of retained freshwater features while improving the resilience of the water-focused parts of the Site over time. Overall, the combination of compact and mixed-density development, local services, connected walking and cycling networks, provision for future public transport, and an integrated blue-green and stormwater network will support lower emission travel choices while improving the ability of the future neighbourhood to respond to changing climatic and hydrological conditions. Accordingly, the proposal is considered to give effect to Objective 8 of the NPS-UD.
Policy 1 Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: (a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and	Policy 1 is closely linked to and reinforces the direction of Objective 1 of the NPS-UD, as assessed above. The Brymer development as proposed will contribute to a well-functioning urban environment through the comprehensive and integrated provision of housing, local commercial activities, transport connections, infrastructure, open space and environmental features. This is supported by the Economic Assessment (refer to Appendix 30) and Urban Design Assessment (UDA)

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(ii) enable Māori to express their cultural traditions and norms; and (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (e) support reductions in greenhouse gas emissions; and (f) are resilient to the likely current and future effects of climate change.	(refer to Appendix 10). In particular, the proposal aligns with each component of Policy 1 as follows: • Policy 1(a) – Variety of homes: Brymer will provide approximately 1,043 residential units across a broad range of housing typologies and densities, including apartments, terraced housing, duplexes, detached dwellings and larger residential lots. This provides meaningful housing choice for different household types, sizes and stages of life, and across a range of price points. The range and distribution of typologies also responds to location, with higher-intensity housing focused around the neighbourhood centre, open spaces and key movement routes, and lower-intensity housing providing transitions toward surrounding interfaces. • Policy 1(b) – Commercial sites: The masterplan provides two mixed-use commercial sites comprising approximately 2,184 m² of commercial GFA, establishing a neighbourhood-scale commercial component within Brymer. The commercial sites will include a superette, together with opportunities for other retail, hospitality and service activities that will support the day-to-day needs of the future community. Their location alongside higher-intensity residential development and the wider movement and open-space network will create an accessible local activity focus and support convenient access by walking and cycling. The Site is also well located in relation to the wider Hamilton urban area, with access via Brymer Road and SH23 and proximity to established centres including Dinsdale, Nawton and Frankton, as well as the Hamilton City Centre and Te Rapa business and industrial area. Accordingly, the commercial component will complement, rather than seek to replicate, the broader range of business, employment and service opportunities readily accessible within Hamilton.

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	• Policy 1(c) – Accessibility: Brymer provides a connected and multimodal movement network that links residential areas with the neighbourhood centre, public parks, recreation reserves, wetlands and other open spaces, as well as with the surrounding Hamilton urban area. Public roads provide the primary movement network, supported by footpaths, shared paths, pedestrian accessways and connections through the open-space network, including a direct connection toward Te Kootii Park. The street network has also been designed to enable future public transport provision on selected roads. This provides future residents with transport choice and facilitates access to local services and open spaces within Brymer, as well as employment, education, community services and other destinations across Hamilton. • Policy 1(d) – Competitive land and development markets: As addressed under Objective 2, Brymer will introduce approximately 81 ha of additional development land adjoining Hamilton and provide a substantial additional source of housing capacity. The Economic Assessment (refer to Appendix 30) identifies strong ongoing housing demand and capacity pressures across the Hamilton and lower Waikato market. At full development, the approximately 1,043 dwellings are expected to represent a net addition to housing supply. The additional capacity and diversity of housing products will increase choice and competition within the wider land and development market and assist in responding to projected housing demand. • Policy 1(e) – Greenhouse gas emissions: The masterplan supports reductions in greenhouse gas emissions through a relatively compact, mixed-density development pattern and the integration of housing with local services, open spaces and a connected multimodal movement network. Walking and cycling are supported through footpaths, shared paths and open-space connections, while selected public roads are designed to accommodate future public

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	transport. These features provide alternatives to private vehicle travel and are specifically identified as assisting in reducing reliance on private vehicles and supporting reductions in greenhouse gas emissions over time. Policy 1(f) – Climate change resilience: Brymer incorporates an integrated blue-green and stormwater network comprising retained and restored wetlands, proposed wetland areas, watercourses, stormwater treatment and management areas, riparian planting and public open spaces. The development has specifically considered the current and future effects of climate change, with the stormwater system designed to manage peak flows up to the 100-year storm event, including climate change. Artificial wetlands will provide treatment, extended detention and attenuation, with post-development peak discharges generally limited to no more than 80% of pre-development flows. Existing flow paths and discharge locations are also retained where practicable, and external and upstream catchment flows have been accounted for to avoid worsening downstream flood effects. This integrated approach will manage stormwater runoff and flood risk while improving the resilience of the development and surrounding receiving environment to future climatic and hydrological conditions. The stormwater response has also been coordinated with the groundwater assessment, including the redirection of treated stormwater to retained wetlands and streams where development would otherwise reduce groundwater recharge and baseflows, further supporting the long-term resilience of the Site’s freshwater systems. Overall, Brymer responds to each component of Policy 1 through the integrated provision of housing choice, local business opportunities, multimodal accessibility, additional competitive development capacity, lower-emission transport choices and climate resilient blue-green infrastructure. These elements work collectively to

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	establish a connected, mixed-use and well-functioning urban environment that supports the present and future needs of the community. Accordingly, the proposal is considered to give effect to Policy 1 of the NPS-UD.
Policy 2 Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The proposed Brymer development is consistent with and supportive of Policy 2 of the NPS-UD, as it will provide a substantial additional source of development capacity to assist in meeting expected housing demand across the Hamilton and lower Waikato housing market over the short, medium and long term. The Economic Assessment (refer to Appendix 30) identifies significant and ongoing growth pressures across this market, with housing demand expected to exceed planned capacity over time. It identifies a potential long-term shortfall of approximately 16,700 dwellings across the combined market area under the High Series projections. The economic assessment also identifies infrastructure constraints across substantial parts of Hamilton's brownfield areas, which limit the extent to which plan-enabled capacity can be realised and increase pressure for additional greenfield capacity. Brymer directly responds to this capacity requirement by enabling approximately 81 ha of land on Hamilton's western urban edge for comprehensively planned urban development, providing approximately 1,043 residential units across a range of housing typologies and densities. Importantly, the Project will be delivered progressively through a multi-staged development framework, with the necessary transport and three-waters infrastructure provided alongside development. The Economic Assessment has considered the timing of this capacity against projected demand and existing and proposed capacity elsewhere in the market. While approximately 100 dwellings delivered in the initial years may partly displace uptake that would otherwise occur elsewhere, growth in demand is expected to exceed permitted greenfield capacity during the medium term, with approximately 380 Brymer dwellings delivered by the end of the medium term expected to represent a

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	net addition to housing supply. By full development, approximately 1,043 dwellings are expected to represent a net addition to supply, reflecting projected medium- and long-term capacity shortfalls and the strong demand arising across the wider market. Brymer will also provide business land capacity appropriate to the scale and function of the future neighbourhood. The two mixed-use commercial sites will provide approximately 2,184 m² of commercial GFA, including a superette and opportunities for other retail, hospitality and service activities, together with residential apartments above. The Economic Assessment identifies the proposed commercial centre as being consistent with the scale of Hamilton's other neighbourhood centres and considers its size efficient for an outer suburban location, where it will have an important role in meeting local convenience needs. This neighbourhood-scale provision complements the broader range of business and employment capacity available within Hamilton rather than seeking to perform a higher-order centre function. Overall, Brymer will provide additional housing and business development capacity in a location immediately adjoining Hamilton's existing urban area, with staged delivery and supporting infrastructure enabling that capacity to respond progressively to demand. As demonstrated by the Economic Assessment (refer to Appendix 30), the proposal will make a meaningful contribution to addressing identified medium and long-term housing capacity pressures, while also providing appropriately scaled business capacity to serve the future community. Accordingly, Brymer will assist the relevant Tier 1 local authorities in providing sufficient development capacity to meet expected demand and is considered to give effect to Policy 2 of the NPS-UD.

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Policy 6 When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters: (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes: (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and (ii) are not, of themselves, an adverse effect (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1) (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity (e) the likely current and future effects of climate change.	The proposed Brymer development is considered consistent with and supportive of Policy 6 of the NPS-UD. Brymer will result in a change from the Site's existing rural character to a comprehensively planned urban neighbourhood on Hamilton's western edge. While the Site is not presently identified within a Future Proof growth area and the existing planning framework does not specifically anticipate its urbanisation, it directly adjoins Hamilton's established urban area. The UDA (refer to Appendix 10) identifies that the proposal has been comprehensively planned to integrate housing, movement, infrastructure, open space and environmental features, providing the basis for a coherent urban extension rather than fragmented or isolated development. In terms of the specific matters identified in Policy 6: • Policy 6(a) – Planned urban built form: The existing RMA planning framework does not presently anticipate urban development of the Site, which remains rural zoned and outside an identified Future Proof growth area. Notwithstanding this, the Site directly adjoins Hamilton's existing western urban edge and the proposed masterplan has been designed as an integrated extension of that urban environment. The proposed built form includes apartments, terraces, duplexes and detached housing, with higher intensity development focused in appropriate locations and lower intensity development used to manage sensitive interfaces. The UDA identifies that this creates a graduated built-form pattern rather than an abrupt transition from adjoining established suburbs. • Policy 6(b) – Changes in urban form and amenity: Brymer will result in a substantial and permanent change in the character and amenity of the Site through its transition from rural land to an urban neighbourhood. Consistent with Policy 6(b), however, the fact that the urban environment and associated amenity values will change is not, of itself, an adverse effect. While existing rural amenity values appreciated by some people will be reduced, the

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	development will create new amenity values for future residents and communities through increased and varied housing densities and types, local commercial services, public parks and recreation reserves, walking and cycling connections and an integrated blue-green network. The proposed distribution of housing also manages this transition, with higher density housing enabling a substantial residential yield while lower-scale housing is retained at sensitive interfaces and on more constrained land. • Policy 6(c) – Benefits of well-functioning urban development: As addressed under Objective 1 and Policy 1 above, Brymer will deliver the key components of a well-functioning urban environment. The development will provide approximately 1,043 dwellings across a broad range of housing typologies and densities, together with neighbourhood scale commercial activities, public and recreational open spaces, walking and cycling connections and supporting infrastructure. The UDA (refer to Appendix X) identifies that the distribution of density responds to the proposed movement network, neighbourhood centre, open spaces, topography and surrounding interfaces. The development also connects with Hamilton’s existing urban edge through its road network, walking and cycling connections and relationship with Te Kootii Park, while safeguarding opportunities for future connections to adjoining land. Collectively, these features support housing choice, accessibility, local services, recreation and connectivity and will contribute to a well-functioning urban environment. • Policy 6(d) – Contribution to development capacity: Brymer will make a material contribution to providing and realising additional housing capacity within the Hamilton and lower Waikato housing market. The Economic Assessment (refer to Appendix 30) identifies strong housing demand over the short, medium and long term and concludes that projected growth is expected

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	to exceed the level of planned capacity, with a potential long-term shortfall of approximately 16,700 dwellings under the High Series projections. Brymer will respond to this demand through the staged delivery of approximately 1,043 dwellings, with the supporting economic assessment identifying that the development will increasingly represent a net addition to overall housing supply as existing capacity is absorbed. The proposal therefore provides a substantive additional source of development capacity that can contribute to meeting projected housing demand. Policy 6(e) – Climate change: The development has considered the likely current and future effects of climate change and incorporates measures that support both emissions reduction and long-term resilience. The UDA (refer to Appendix 10) identifies that walking and cycling infrastructure, together with provision for future public transport on selected roads, will increase transport choice and assist in reducing reliance on private vehicle travel and associated greenhouse gas emissions over time. Brymer also incorporates an integrated blue-green and stormwater network comprising retained and restored wetlands, watercourses, stormwater management areas, riparian planting and public open spaces. As set out in the Infrastructure Report and SMP (refer to Appendix 13 and 14). The development actively seeks to manage potential flood and stormwater risk through an integrated stormwater network designed to accommodate events up to the 100 year storm, including climate change. The proposed wetlands will provide treatment, extended detention and attenuation, with post-development peak discharges generally limited to no more than 80% of pre-development flows. Existing flow paths and discharge locations are also retained where practicable and upstream catchment flows have been accounted for to avoid worsening downstream effects. Collectively, these measures provide a coordinated response to current and future climatic

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	and hydrological conditions and contribute to the long-term resilience of the development and surrounding environment. Overall, Brymer represents a significant but comprehensively planned urban change at Hamilton’s western edge. While the existing planning framework does not currently anticipate urbanisation of the Site, Policy 6 requires regard to the wider benefits of urban development, changes in amenity values, contributions to development capacity and the effects of climate change. As supported by the Economic Assessment and UDA (refer to Appendices 30 and 10), Brymer will deliver substantial additional housing capacity and housing choice within a connected and well-functioning urban neighbourhood, while appropriately managing its interfaces and providing climate-responsive infrastructure. Accordingly, the proposal is considered to support the outcomes sought through Policy 6 of the NPS-UD.

National Policy Statement on Indigenous Biodiversity 2023

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Objective The objective of this National Policy Statement is: (a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and (b) to achieve this: (i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and (ii) by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and	The Brymer development has been designed to ensure at least no overall loss of indigenous biodiversity and, in key respects, to deliver a net positive ecological outcome. The EclA (refer to Appendix 23) confirms that the Site is a highly modified rural environment. No terrestrial vegetation within the Site meets the relevant significance criteria, while the natural wetlands are highly modified and degraded but retain moderate ecological value due principally to the rarity of wetland habitat and their restoration potential. Overall, the proposal is considered to give effect to the Objective for the following reasons:

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(iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and (iv) while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.	(a) Maintaining Indigenous Biodiversity – No Overall Loss - While development will affect some existing wetland, stream and terrestrial habitat, the ecological response includes wetland creation and restoration, stream restoration and creation, extensive indigenous planting, livestock exclusion, weed and animal pest control, and permanent protection of restored wetland areas. The Biodiversity Compensation Model predicts a 13.2% net positive outcome for wetland habitat, with net positive outcomes for both wetland and stream habitat anticipated from Stage 1. - Existing degraded wetlands will be enhanced through replacement of exotic vegetation with indigenous species, increased native plant diversity and abundance, pest management and improved buffering and connectivity. The EclA anticipates that these measures will increase the ecological value of restored wetlands from moderate to high over time. - Potential effects on indigenous fauna are specifically managed. Copper skink, an At Risk – Declining species likely to occur within the Site, will be managed through a Lizard Management Plan (LMP) (refer to Appendix 23) incorporating pre-clearance capture and relocation and enhancement of release habitat. Long-tailed bats have also been recorded commuting through the Site and will be appropriately managed through the ecological effects management framework (b)(i) Recognising the Mana of Tangata Whenua as Kaitiaki - The Project recognises Ngāti Māhanga as mana whenua and kaitiaki and provides for their ongoing involvement in design, ecological restoration, cultural monitoring and environmental management. The CIA (refer to Appendix 24) identifies wetlands, waterways and taonga species as

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	culturally significant and seeks their protection and enhancement, together with continued tangata whenua involvement through the design, construction, monitoring and operational phases of the Project. (b)(ii) Recognising People and Communities as Stewards - The Project will transition a predominantly pastoral and highly modified environment to a comprehensively managed urban landscape incorporating restored wetlands, waterways, indigenous planting and connected open-space areas. These features will be subject to ongoing management, including planting, weed and pest control and ecological monitoring, providing a framework for the Applicant and future community to contribute to the long-term stewardship of indigenous biodiversity. (b)(iii) Protecting and Restoring Indigenous Biodiversity - The Project provides substantial opportunities to actively restore indigenous biodiversity, rather than simply retain existing degraded ecological values. Wetland restoration and creation, stream restoration, indigenous riparian planting and improved ecological connectivity will create a more diverse and resilient ecological network across the Site. Restored wetlands will be legally protected in perpetuity, with maintenance and weed and animal pest control undertaken for at least five years and ecological gains expected to continue over the longer term. (b)(iv) Providing for Social, Economic and Cultural Wellbeing - These biodiversity outcomes will be achieved alongside delivery of approximately 1,043 new homes across a range of housing typologies, together with neighbourhood facilities, infrastructure and an integrated open-space network. The Project therefore provides for significant social and economic

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	wellbeing while also improving opportunities for future residents to experience and connect with restored wetlands, waterways and indigenous vegetation. Cultural wellbeing is supported through recognition of Ngāti Māhanga's relationship with the whenua, wai and taonga species and their continuing role as kaitiaki. For these reasons, the proposal is considered consistent with the Objective of the NPS-IB. It achieves at least no overall loss of indigenous biodiversity and is expected to deliver net positive outcomes for key freshwater habitats, while recognising tangata whenua and the wider community as stewards of biodiversity, actively restoring degraded ecological systems, and enabling significant social, economic and cultural benefits.
Policy 1 Indigenous biodiversity is managed in a way that gives effect to the decision-making principles and takes into account the principles of the Treaty of Waitangi.	The proposed Brymer development is consistent with Policy 1, as the management of indigenous biodiversity has been informed by sustained engagement with tangata whenua and provides for the ongoing exercise of kaitiakitanga throughout the development. Extensive engagement with tangata whenua has occurred through the referral and substantive application processes, as detailed in the Engagement and Consultation Report (refer to Planning Attachment 2). A CIA (refer to Appendix 24) has also been prepared by Ngāti Māhanga as mana whenua. The CIA identifies the cultural significance of the Site's whenua, wai, wetlands and taonga species, including indigenous freshwater fish and copper skink, and recognises that natural wetlands and connected waterways form part of a wider ecological and cultural network requiring careful management to protect mauri and ecological function. Importantly, this engagement extends beyond consultation on the application itself. The Project provides for ongoing Ngāti Māhanga involvement in design, ecological

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	restoration, cultural monitoring and environmental management, recognising their role as mana whenua and kaitiaki. The CIA seeks protection of taonga species, retention and enhancement of wetlands, active monitoring of cumulative effects and formalised ongoing engagement. Ngāti Māhanga also seek a long-term working relationship through design refinement, construction, monitoring and operation of the Project. The Project's ecological response also reflects the principle of active protection, through measures to protect, restore and enhance indigenous biodiversity, including wetland and stream restoration, indigenous planting and specific fauna management. The CIA itself identifies that active protection requires adverse effects on taonga to be avoided where practicable and otherwise remedied or mitigated to maintain cultural integrity. Accordingly, the proposal gives practical effect to the relevant decision-making and Treaty principles through partnership and ongoing participation with tangata whenua, recognition of mana whenua and kaitiakitanga, and active protection and restoration of indigenous biodiversity and taonga species. The proposal is therefore considered consistent with Policy 1 of the NPS-IB.
Policy 2 Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through: (a) managing indigenous biodiversity on their land; and (b) identifying and protecting indigenous species, populations and ecosystems that are taonga; and (c) actively participating in other decision-making about indigenous biodiversity.	The proposal is considered consistent with Policy 2, as the Project recognises Ngāti Māhanga as mana whenua and kaitiaki and provides opportunities for their active and ongoing involvement in the protection, restoration and management of indigenous biodiversity within their rohe. In relation to (a), while the development Site is privately owned, the Project recognises the broader kaitiakitanga responsibilities of Ngāti Māhanga for the whenua, wai and indigenous biodiversity within their rohe. The CIA (refer to Appendix 24) expressly identifies ongoing opportunities for Ngāti Māhanga to

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	exercise kaitiakitanga through environmental management and seeks a continuing role through design refinement, construction, monitoring and operation of the development. In relation to (b), the CIA specifically identifies indigenous species and ecosystems of importance to Ngāti Māhanga. Taonga species recorded within or near the Site include black mudfish, longfin tuna, giant kōkopu, īnanga and copper skink, together with other indigenous fauna potentially affected by development. The CIA also identifies natural wetlands and connected waterways as part of a broader ecological and cultural network requiring careful management to protect their mauri and ecological function. These values are supported by the EclA (refer to Appendix 23), with the Project incorporating wetland and stream restoration and creation, indigenous riparian planting, improved habitat connectivity and specific fauna management measures. In relation to (c), Ngāti Māhanga have actively participated in decision-making through engagement undertaken during development of the Project and preparation of an independent CIA, which identifies cultural effects, mitigation expectations and requirements for ongoing involvement. Importantly, the CIA confirms that the exercise of kaitiakitanga is intended to continue beyond consenting through design refinement, construction, cultural and environmental monitoring and long-term operation, including monitoring of cumulative effects and restoration outcomes. Accordingly, the Project provides a practical framework for Ngāti Māhanga to exercise kaitiakitanga through the identification and protection of taonga species and ecosystems, ecological restoration and monitoring, and ongoing participation in

Objective / Policy	Comment
	decisions affecting indigenous biodiversity. The proposal is therefore considered consistent with Policy 2 of the NPS-IB.
Policy 3 A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.	The Project adopts a precautionary approach consistent with Policy 3 by identifying potential ecological values and effects through detailed investigations and incorporating avoidance, mitigation and management measures where indigenous biodiversity may be affected, including where some uncertainty remains. In particular: • Comprehensive ecological investigations: The EclA (refer to Appendix 23) assesses terrestrial vegetation, birds, lizards, bats, wetlands, freshwater habitat and fish, and identifies the potential effects of earthworks, vegetation clearance, stormwater and the change in land use. While much of the development footprint comprises pasture/cropping land of negligible botanical value, higher-value features and potential fauna habitat have been specifically identified and addressed. • Protection and enhancement of higher-value habitat: The design retains and provides legal and physical protection for the existing 1.52 ha kānuka treeland, together with approximately 1.2 ha of retained natural wetlands. Riparian and wetland buffers, hillsides and stormwater reserves are also proposed for extensive native planting and ecological enhancement. Approximately 26.7 ha of the Site, excluding residential lot and streetscape planting, will be planted and is expected to result in a positive ecological outcome. • Wetland protection and restoration: Retained natural wetlands will be restored through native planting, weed and animal pest control and generally 10 m planted buffers. Where wetland loss cannot practicably be avoided, more than 0.75 ha of new wetland habitat is proposed alongside restoration of retained

Objective / Policy	Comment
	wetlands, with the EclA assessing the compensation package as resulting in a 13.2% net gain. Precautionary management of long-tailed bats: Long-tailed bats have been recorded using the Site. Accordingly, the potential for bats to roost within trees proposed for removal has been recognised and a Bat Management Plan (BMP) prepared. Vegetation removal will be undertaken in accordance with DOC Bat Roost Protocols to ensure bats are not present when potentially suitable roost trees are removed, reducing the assessed residual effect to low. The BMP specifically provides for potential bat-roost tree surveys and protocols governing vegetation clearance. Precautionary management of lizards: Ecological surveys identified two undetermined skinks and, based on the habitat and comparable local surveys, the EclA considers copper skink and potentially ornate skink may occur at very low densities. Accordingly, the Project does not rely on an assumption that lizards are absent, with fauna management measures and the Wildlife Act approval process providing for their management should protected lizards be encountered. A LMP is in place, including salvage, relocation, and habitat enhancement. Native birds: While bird habitat within the Site is assessed as having low ecological value and species of conservation interest are expected to be only infrequent visitors, the Project adopts a precautionary approach to vegetation clearance. Potential nesting habitat will be cleared outside the breeding season where practicable, or pre-clearance nest checks will be undertaken by a suitably qualified ecologist. Where native bird nests are identified, affected vegetation will not be removed until the birds have fledged or the nests have been naturally abandoned.

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	• Effects management hierarchy and residual effects: The EclA applies the effects management hierarchy, with adverse effects first avoided, minimised and remedied. Where residual effects remain in relation to wetland and stream habitat, additional creation, restoration and enhancement is proposed. Importantly, the EclA recognises uncertainty associated with quantitatively offsetting complex wetland and stream functions and therefore adopts ecological compensation where an offset cannot be demonstrated with adequate certainty. Overall, the Project reflects a precautionary approach to indigenous biodiversity by identifying ecological risks through detailed investigation, protecting higher-value features, assuming the potential presence of protected fauna where appropriate, and establishing specific management protocols to address potential effects. Residual effects are addressed through substantial restoration, habitat creation and enhancement measures intended to achieve a net positive ecological outcome. The proposal is therefore considered consistent with Policy 3 of the NPS-IB.
Policy 4 Indigenous biodiversity is managed to promote resilience to the effects of climate change.	The proposed Brymer developments ecological response will increase the extent, quality and connectivity of indigenous habitat across the Site, thereby improving the ability of indigenous biodiversity to respond and adapt to environmental change over time. The EclA (refer to Appendix 23) identifies that the Site is presently a highly modified rural environment, with much of the existing habitat fragmented and degraded. The Project will substantially increase indigenous vegetation through native planting associated with wetlands, streams, riparian margins and stormwater reserves. This will replace areas of exotic vegetation and pasture with a more diverse and connected indigenous habitat network. For example, temporary lizard habitat loss will be replaced by approximately 18.4 ha of native planting along streams and

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	wetlands, connected to a further 7.1 ha of native vegetation within stormwater reserves, with these areas also subject to animal pest control. The restoration and creation of wetlands will further improve ecological resilience. Existing degraded wetlands will be restored through replacement of exotic species with indigenous vegetation, increased native plant diversity and abundance, pest management and improved buffering. Importantly, the EclA identifies that the restored wetlands will connect with the existing stream network, kānuka treeland and created wetland habitat, contributing to a more robust and well-functioning ecological community. Created wetlands will similarly be densely planted with indigenous species and benefit from proximity to other wetlands within the catchment, supporting species dispersal. The wider blue-green network also integrates wetland enhancement and creation, new and restored stream habitat, stormwater reserves and extensive riparian and buffer planting. These measures will improve habitat connectivity and provide opportunities for indigenous fauna to move through and utilise the Site as vegetation establishes and matures. The Project's stormwater infrastructure has also been designed having regard to future climate change, with proposed wetlands sized to manage peak flows up to the 100-year storm event including climate change, while controlling discharge and reducing downstream flood risk. This provides additional resilience for the wetland, stream and riparian habitats integrated with the stormwater network. Accordingly, by increasing indigenous habitat, restoring degraded ecosystems, improving ecological connectivity and incorporating climate change into the design of the wider blue-green network, the Project will establish a more diverse,

Objective / Policy	Comment
	connected and resilient ecological system than presently exists. The proposal is therefore considered consistent with Policy 4 of the NPS-IB.
Policy 5 Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.	Indigenous biodiversity for the Brymer development has been assessed and managed as part of a wider ecological and catchment system rather than solely by reference to the Site or territorial authority boundary. The Site is located within Waikato District but directly adjoins Hamilton City, and the project therefore sits at an important administrative and ecological interface. The UDA (refer to Appendix 10) identifies the Site as forming part of the upper Ohote Stream catchment, with its wetlands, modified watercourses and artificial drains forming an interconnected drainage and ecological network that extends beyond the Site. The ecological response accordingly considers connections with the wider receiving environment and surrounding habitat network rather than treating biodiversity values in isolation. The proposed development reinforces this integrated approach through an extensive network of retained and restored wetlands and streams, indigenous riparian planting, stormwater reserves and other planted open spaces, which will improve ecological connectivity across the Site and into the surrounding environment. The wider open space network also connects with existing Hamilton City reserves, including Rakautahi Park, Brymer Glen Reserve, Brymer Park and Te Kootii Park, supporting broader landscape and ecological connections across the territorial boundary. Importantly, the Project has also involved engagement across the relevant administrative jurisdictions. Consultation has occurred with WDC, HCC and WRC, together with mana whenua and other relevant agencies. This is particularly appropriate given the Site's location immediately adjoining Hamilton and the wider

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	catchment-based ecological and freshwater issues associated with the development. Accordingly, the Project provides for indigenous biodiversity to be managed through an integrated ecological, freshwater and open-space framework that responds to ecological processes extending beyond both the Site and territorial boundaries, supported by engagement with the relevant local and regional authorities. The proposal is therefore considered consistent with Policy 5 of the NPS-IB.
Policy 7 SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.	Policy 7 is of limited direct relevance to the Brymer development, as the EclA (refer to Appendix 23) confirms that no Significant Natural Area (SNA) was identified or located within the site. The Site is predominantly a highly modified rural environment, with terrestrial vegetation largely comprising pasture, exotic trees and shrubs, and a relatively small area of kānuka treeland. Notwithstanding this, the Project adopts a protective approach to ecological features with comparatively higher value. The existing kānuka treeland is retained and protected, while substantial areas of wetland, riparian margins, hillsides and stormwater reserves will be restored or enhanced through indigenous planting, pest control and improved ecological connectivity. The Project therefore avoids unnecessary effects on the more ecologically valuable parts of the Site and incorporates them into the wider blue-green network. The EclA does identify the Site's natural inland wetlands as significant under the WRPS wetland significance criteria, because wetlands are a threatened and under-represented habitat type within the Hamilton Ecological District. However, their current ecological condition is poor, they are dominated primarily by exotic species, and the EclA characterises their significance as relatively low, while recognising their enduring hydrology and restoration potential. Effects on these wetlands are

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	addressed separately through the effects management hierarchy, including retention and restoration where practicable and wetland creation and compensation where loss cannot be avoided. Accordingly, there are no terrestrial SNAs within the Site that would be adversely affected by the proposed subdivision and development. Nevertheless, the Project has identified and protected higher-value ecological features and provides substantial restoration and enhancement of indigenous biodiversity. The proposal is therefore considered consistent with the intent of Policy 7 of the NPS-IB.
Policy 8 The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.	The importance of maintaining and enhancing indigenous biodiversity outside SNAs has been expressly recognised for Brymer through the EclA (refer to Appendix 23), project design and proposed effects management measures. As outlined in relation to Policy 7 above, the EclA confirms that no terrestrial vegetation within the Site meets the criteria for an SNA. Notwithstanding this, the EclA identifies and assesses indigenous biodiversity values across the Site, including native vegetation, indigenous birds, copper skinks, long-tailed bats, wetlands, watercourses and native fish habitat. The proposal therefore does not rely on the absence of an SNA as a basis for disregarding ecological values. In particular, the proposal provides for: • Substantial indigenous habitat creation and enhancement, including approximately 26.7 ha of planting associated with riparian areas, wetlands and kānuka treeland. The EclA assesses this planting and enhancement as having a net positive ecological effect. • Replacement and enhancement of terrestrial habitat, with the removal of exotic vegetation and occasional common native vegetation more than

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	compensated for through native riparian and wetland planting. The EclA anticipates a net positive medium to long term outcome for bird and lizard habitat as this planting establishes. • Protection of indigenous fauna during construction, including seasonal vegetation clearance or pre-clearance nesting checks for native birds, lizard habitat creation and pest control, and specific management of potential effects on long-tailed bats through the Bat Management Plan. • Restoration and enhancement of freshwater and wetland habitat, including creation and restoration of wetlands and streams, indigenous riparian planting and enhancement of parts of the drainage network. These measures will improve habitat quality and strengthen ecological connectivity between waterways, wetlands, stormwater areas and terrestrial planting across the Site. Importantly, the EclA concludes that following mitigation there are no residual adverse terrestrial ecological effects requiring further residual effects management, with the extensive planting programme expected to deliver positive ecological outcomes over time. Accordingly, although the Site does not contain terrestrial SNAs, the Project recognises, protects and enhances indigenous biodiversity values outside SNAs, while substantially increasing the extent and connectivity of indigenous habitat across the Site. The proposal is therefore considered consistent with Policy 8 of the NPS-IB.
Policy 10 Activities that contribute to New Zealand’s social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.	The proposed Brymer development will make a substantial contribution to social, economic, cultural and environmental wellbeing, while managing effects on indigenous biodiversity in accordance with the wider NPS-IB framework as this assessment has highlighted.

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	From a social and economic wellbeing perspective, the Project will deliver approximately 1,043 new homes across a range of typologies and densities, together with neighbourhood scale commercial activities, open space, infrastructure and improved connections. The Economic Assessment (refer to Appendix 30) identifies significant wider benefits, including increased housing supply and choice, support for housing affordability and market competition, and substantial construction-related GDP, wages and employment. The assessment estimates approximately \$720 million in GDP, \$428 million in wages and salaries and the equivalent of more than 500 full-time jobs during construction, with further ongoing expenditure and employment benefits once the development is established. The Project also provides for cultural wellbeing through its engagement with Ngāti Māhanga and recognition of mana whenua values and kaitiakitanga. The Project has been informed by the Waikato-Tainui Environmental Plan and the Ngāti Māhanga CIA (refer to Appendix 24) and provides for ongoing involvement in design, ecological restoration, cultural monitoring and environmental management. Importantly, those social, economic and cultural benefits are being delivered alongside a substantial environmental and indigenous biodiversity response. The EclA (refer to Appendix 23) provides for restoration and creation of wetland and stream habitat, extensive indigenous planting, habitat enhancement, pest management and improved ecological connectivity. The EclA predicts net positive effects for both stream and wetland habitats from Stage 1, with ecological gains increasing as restoration and planting establish over time. Restored wetlands are expected to increase in ecological value through replacement of exotic vegetation with native species, increased indigenous plant diversity, pest control and improved connectivity with streams and the retained kānuka treeland.

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	Accordingly, Brymer represents a development that enables significant housing, employment and economic benefits, recognises and provides for cultural wellbeing and kaitiakitanga, and delivers substantive ecological restoration and biodiversity enhancement. These outcomes are achieved alongside the specific measures required elsewhere in the NPS-IB to manage effects on indigenous biodiversity. The proposal is therefore considered consistent with Policy 10 of the NPS-IB.
Policy 13 Restoration of indigenous biodiversity is promoted and provided for.	The proposed Brymer development is considered strongly consistent with Policy 13, as restoration and enhancement of indigenous biodiversity is a significant component of the Project and will result in substantial improvement to the Site's presently modified ecological environment. The Ecological Impact Assessment (refer to Appendix XX) identifies restoration of ecological features as a key component of the Project. This includes the retention, legal and physical protection of the existing 1.52 ha kānuka treeland, protection and enhancement of approximately 1.2 ha of existing wetland habitat, and approximately 26.7 ha of planting and enhancement across wetlands, riparian and wetland buffer areas, hillsides and stormwater reserves. Plant and animal pest control will also be undertaken within planted and protected areas, with indigenous planting integrated across stormwater and other ecological areas. The EclA assesses this planting and enhancement programme as producing a net positive terrestrial ecological outcome. The Project also provides for substantial wetland restoration and creation. Approximately 0.75 ha of new wetland habitat will be established, while approximately 1.2 ha of retained degraded wetlands will be restored through indigenous planting, livestock exclusion, weed and animal pest control and improved buffering. The EclA anticipates the ecological value of restored wetlands increasing from moderate to high over time, with improved connections to the

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	stream network, kānuka treeland and created wetlands contributing to a more robust and functioning ecological community. Restored wetlands will also be legally protected in perpetuity, with maintenance and pest control undertaken for a minimum of five years and a trajectory towards a net positive outcome at 15 years. Stream habitat will similarly be restored and expanded. The Project includes restoration of existing modified streams, creation of approximately 134 m of new stream channel, and indigenous riparian planting, including an additional 749 m of artificial drain. The created stream will incorporate native vegetation adapted to different moisture conditions and connect with the wider riparian and stormwater planting network, improving habitat quality and ecological connectivity. Importantly, restoration is proposed from the early stages of development. The EclA predicts net positive wetland and stream outcomes from Stage 1, with further restoration and stream creation progressively implemented through later stages. Accordingly, the Project goes beyond simply managing adverse effects and provides for the active restoration, enhancement, protection and reconnection of indigenous habitats across the Site. These measures will substantially increase indigenous vegetation, improve habitat quality and connectivity, and enhance the long-term ecological functioning of the Site. The proposal is therefore considered consistent with Policy 13 of the NPS-IB.
Policy 14 Increased indigenous vegetation cover is promoted in both urban and nonurban environments.	The Brymer development will substantially increase indigenous vegetation cover across the Site that is presently dominated by pasture, cropping land, exotic vegetation and other highly modified rural vegetation. The EclA (refer to Appendix 23) identifies indigenous planting and ecological restoration as a significant component of the Project. Approximately 26.7 ha of the Site will be subject to planting and enhancement across existing and created

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	wetlands, riparian and wetland buffer areas, hillsides, stormwater reserves and the retained kānuka treeland. Plant and animal pest control will also be undertaken within these planted and protected areas, and native planting within stormwater treatment devices will be integrated with other natural and vegetated areas across the Site. This planting will result in a substantial increase in indigenous vegetation relative to the existing environment. Approximately 2 ha of predominantly exotic trees, shrubs and weeds, together with occasional common native vegetation, will be removed as part of development but will be more than replaced by indigenous planting within riparian and wetland areas. The EclA consequently assesses the botanical outcome of the planting programme as net positive. The planting programme also has an important ecological restoration function. Existing degraded wetlands will be restored through the replacement of exotic species with native species and increased indigenous plant diversity and abundance. Approximately 0.75 ha of new wetland habitat will also be created and densely planted with native wetland species, while restoration planting along existing and created streams will strengthen connections between wetlands, waterways, stormwater reserves and terrestrial habitats. Native species used for restorative planting are also proposed to be eco-sourced to the Hamilton region, further supporting appropriate indigenous biodiversity outcomes. Importantly, Brymer will transition from its existing predominantly rural land use to an urban environment containing a substantial and interconnected network of indigenous vegetation. The proposal therefore directly advances Policy 14 by materially increasing indigenous vegetation cover as part of the urbanisation of the

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	Site, while using that vegetation to restore habitat, improve ecological connectivity and strengthen indigenous biodiversity values. Accordingly, the proposal is considered strongly consistent with Policy 14 of the NPS-IB.
Policy 15 Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.	The proposed Brymer development is considered consistent with Policy 15, with the long-tailed bat being the specified highly mobile fauna species of particular relevance to the Site. The EclA (refer to Appendix 23) identifies long-tailed bats as Threatened – Nationally Critical and confirms that they occur within the wider Hamilton landscape and have been detected passing through the Site. The Site surveys recorded two bat passes, both considered most likely to be commuting calls. The EclA considers that bats are likely to move through the Site only occasionally and that it does not represent core habitat. Potential roosting and foraging habitat is nevertheless present, including mature trees, wetlands and drainage features. On this basis, the Project has taken a precautionary approach to managing potential effects on this highly mobile species rather than relying on the relatively low level of recorded activity. A specific BMP (refer to Appendix 23) has therefore been prepared. It requires implementation of the Department of Conservation Bat Roost Protocols during vegetation clearance to avoid injury or mortality where bats may be occupying potential roost trees. If a confirmed roost is encountered, provision is also made for artificial roost boxes. With these measures implemented, the EclA assesses residual effects on bats as low. Importantly, the Project will also substantially increase potential long-term bat habitat. Native planting associated with wetland and riparian enhancement will include larger tree species capable of developing potential roost features over time.

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	The EclA concludes that this planting will enhance habitat and increase the availability of potential roost trees as vegetation matures, resulting in a net positive long-term effect on bat habitat. The masterplan also locates predominantly residential development, rather than roads and associated street lighting, adjacent to the principal riparian and wetland planting areas, helping maintain relatively low-light conditions suitable for potential bat use. The Bat Management Plan further identifies a 40 m wide east-west planted corridor through the Site as part of the long-term increase in potential bat habitat. Accordingly, the Project has identified the presence and potential habitat requirements of highly mobile long-tailed bats, assessed their use of the Site in the context of the wider landscape, and incorporated specific measures to protect individuals and improve habitat availability and connectivity over time. The proposal is therefore considered consistent with Policy 15 of the NPS-IB.

National Policy Statement for Highly Productive Land 2022

Objective / Policy	Comment
Objective Highly productive land is protected for use in land-based primary production, both now and for future generations.	The objective of the NPS-HPL is that highly productive land is protected for use in land-based primary production, both now and for future generations. The proposal does not fully align with the protective direction of the objective, as parts of the Brymer site are currently treated as highly productive land under the transitional provisions of the NPS-HPL and will be urbanised as part of the proposed development. However, the proposal must also be considered in the context of the broader statutory framework, including the recognition within the NPS-HPL itself that urban development may occur on highly productive land in certain circumstances.

Barker & Associates

+64 375 0900 | admin@barker.co.nz | barker.co.nz

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Objective / Policy	Comment
	The Brymer site is located immediately adjacent to Hamilton’s existing urban boundary and established residential areas. The proposal provides for a comprehensively planned residential development comprising approximately 1043 residential units, neighbourhood centres, public open space, infrastructure and ecological restoration areas. Under the transitional provisions of the NPS-HPL, parts of the site are identified as LUC 2 and 3 land and are therefore treated as highly productive land. The proposal will consequently result in the loss of some land available for land-based primary production. In that respect, there is an inherent tension with the objective of the NPS-HPL. While parts of the site meet the definition of highly productive land under the NPS-HPL, several factors mean the proposal is considered to generally align with the broader intent and outcomes sought by the NPS-HPL: • The proposal directly responds to an identified housing capacity shortfall within Hamilton and the wider Waikato region. The Economic Assessment (refer to Appendix 30) identifies that Hamilton is unlikely to meet its housing capacity obligations under the NPS-UD and that the proposal would provide a substantial increase in development capacity in a location capable of being efficiently serviced. The proposal therefore addresses an important national and regional urban development outcome recognised through the NPS-UD. • The site is strategically located on the urban edge of Hamilton and adjoins existing residential development and infrastructure networks. The proposal consolidates urban growth in a single integrated location and avoids dispersed rural-residential fragmentation across other rural areas. The masterplanned nature of the development, including integrated infrastructure,

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	neighbourhood centres, active transport connections and open space networks, promotes an efficient and compact urban form. While the NPS-HPL transitional provisions require reliance on the existing regional-scale NZLRI mapping, and therefore the site-specific LUC assessment (refer to Appendix 29) cannot be used to redefine the extent of highly productive land for the purposes of this assessment, the detailed soil assessment nevertheless provides important contextual information regarding the actual characteristics of the site. In particular, the assessment confirms that not all of the site comprises LUC 1–3 land, with substantial portions of the site identified as LUC 4 and LUC 6 land, together with areas of non-productive land. The assessment also identifies extensive wetness limitations, peat soils, slope constraints, erosion susceptibility and modified land across the site. While this does not alter the current application of the NPS-HPL, it does indicate that significant portions of the site are unlikely to ultimately be mapped as highly productive land once the regional council completes the mapping exercise required under the NPS-HPL. In that respect, a pragmatic approach is appropriate when assessing the extent to which the proposal aligns with the intent of the objective. Overall, the proposal is not fully consistent with the primary protective direction of the NPS-HPL objective because it will result in the urbanisation of some land currently treated as highly productive land under the transitional provisions of the NPS-HPL. However, the extent of inconsistency is moderated by several factors, including the site’s strategic location adjoining Hamilton’s urban boundary, the integrated and efficient urban form proposed, and the significant housing and infrastructure benefits associated with the development. Further, while the NPS-HPL requires reliance on the existing regional-scale NZLRI mapping, the detailed soil assessment provides important contextual information confirming that not all of the

Objective / Policy	Comment
	site comprises LUC 1–3 land, with substantial portions identified as LUC 4 and LUC 6 land, together with non-productive areas. On balance, while there is some misalignment with the protective direction of the objective, the proposal is considered to generally align with the broader intent and outcomes sought by the NPS-HPL when considered in the context of the wider planning framework and identified housing need.
Policy 1 Highly productive land is recognised as a resource with finite characteristics and long-term values for land-based primary production.	The proposal involves land currently treated as LUC 1–3 land under the transitional provisions of the NPS-HPL. As such, parts of the Brymer site fall within the scope of the NPS-HPL. While the proposal will result in the urbanisation of some highly productive land, it is considered to generally align with Policy 1 of the NPS-HPL for the following reasons. <u>Site Specific Context</u> While the NPS-HPL requires reliance on the existing regional-scale NZLRI mapping, the detailed site-specific soil and LUC assessment nevertheless provides important contextual information regarding the characteristics of the site. The assessment confirms that not all of the site comprises LUC 1–3 land, with substantial portions identified as LUC 4 and LUC 6 land, together with non-productive areas. The assessment also identifies extensive wetness limitations, peat soils, erosion constraints and modified land across the site. While this does not alter the current application of the NPS-HPL, it indicates that significant portions of the site are unlikely to ultimately be mapped as highly productive land once the regional council completes the mapping exercise required under the NPS-HPL. In that respect, a pragmatic approach is appropriate when considering the extent to which the proposal aligns with Policy 1. The site-specific soil assessment (refer to Appendix 29), together with the Economic Assessment (refer to Appendix 30), demonstrates that the Site has materially constrained productive potential and that its continued rural use provides comparatively limited economic benefit. In the context of the

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	identified need for additional housing, it is therefore more pragmatic to accommodate urban growth on land such as the Site, where productive potential is constrained, rather than place additional development pressure on larger, more cohesive and genuinely highly productive rural land elsewhere. This approach enables the Site to contribute to meeting an identified housing need while supporting the broader purpose of the NPS-HPL by retaining the rural land resource with the greatest productive value for primary production over the long term. <u>Demand for housing</u> The proposal responds directly to identified housing demand within Hamilton and the wider Waikato region and will provide approximately 1,043 residential units in a strategically located area adjoining Hamilton’s existing urban boundary. The proposal will deliver substantial residential capacity together with integrated infrastructure, neighbourhood centres and public open space in a location capable of being efficiently serviced. In this context, the proposal provides significant social and economic benefits through addressing housing supply and supporting a well-functioning urban environment. <u>Efficient and compact urban form</u> The proposal incorporates a range of residential typologies, integrated infrastructure and neighbourhood amenities to ensure efficient use of land and infrastructure. The compact urban form proposed reduces pressure for uncoordinated urban expansion elsewhere and supports the efficient delivery of housing in a location directly connected to Hamilton’s existing urban environment. In summary, while the proposal will result in the loss of some land currently treated as highly productive land, it is considered to generally align with Policy 1 of the NPS-HPL due to:

Objective / Policy	Comment
	- the strategic urban location of the site adjoining Hamilton’s urban boundary; - the significant identified housing need and public benefit associated with the proposal; - the comprehensive and integrated urban form proposed; and - the contextual evidence confirming that substantial portions of the site are constrained, non-productive, or comprise land outside LUC 1–3. Collectively, these factors support the conclusion that the proposal broadly aligns with the intent of Policy 1 notwithstanding some loss of highly productive land.
Policy 2 The identification and management of highly productive land is undertaken in an integrated way that considers the interactions with freshwater management and urban development.	The Brymer proposal adopts an integrated approach to the management of highly productive land, urban development and freshwater outcomes, consistent with the intent of Policy 2 of the NPS-HPL. Integrated urban development: While parts of the site are currently treated as highly productive land under the transitional provisions of the NPS-HPL, there is also a significant portion of the site that is not classified as highly productive. The site is located directly adjoining Hamilton’s existing urban boundary and established residential areas at Grandview Heights and Western Heights. The proposal therefore represents a logical and coordinated urban expansion area contiguous with the existing urban environment, rather than isolated or ad hoc rural development. The proposal will provide approximately 1,043 residential units together with integrated infrastructure, neighbourhood centres, public open space and ecological restoration areas. In this respect, the proposal integrates urban growth outcomes with the efficient use of land and infrastructure.

Objective / Policy	Comment
	• Freshwater management integration: The proposal incorporates a comprehensive stormwater and ecological management framework, including stormwater corridors, wetlands, open space networks and ecological restoration areas integrated throughout the masterplan. These measures are intended to manage stormwater effects within the development footprint, support water quality outcomes and provide ecological enhancement, reflecting an integrated approach to freshwater management alongside urban development. • Integrated masterplanning: The proposal has been comprehensively masterplanned to coordinate land use, transport connections, infrastructure delivery, stormwater management and open space outcomes within a single integrated urban expansion area. This approach avoids fragmented rural-residential development patterns and supports a more efficient and cohesive urban form. • Context of the land resource: While the NPS-HPL requires reliance on the regional-scale NZLRI mapping, the detailed soil and LUC assessment provides important contextual information confirming that not all of the site comprises LUC 1–3 land, with approximately 40% of the site comprising LUC 4–6 land and non-productive areas. While this does not alter the application of the NPS-HPL, it provides additional context regarding the characteristics of the land resource being considered as part of the integrated planning process. Overall, the proposal demonstrates an integrated approach to urban growth, infrastructure provision, freshwater management and land use planning. While the proposal will result in the urbanisation of some land currently treated as highly productive land, it is considered to generally align with the intent of Policy 2 through

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	the coordinated and comprehensive manner in which these matters have been addressed.
Policy 4 The use of highly productive land for land-based primary production is prioritised and supported.	Policy 4 of the NPS-HPL seeks to prioritise and support the use of highly productive land for land-based primary production. It is acknowledged that the proposal is not fully consistent with the directive intent of this policy, as it will result in the urbanisation of some land currently treated as highly productive land under the transitional provisions of the NPS-HPL. However, when considered in the context of the site's location, the nature of the land resource, and the wider planning framework, the proposal is considered to generally align with the broader intent of the policy. The Brymer site is located directly adjoining Hamilton's urban boundary and proposes a comprehensively masterplanned residential development of approximately 1,043 residential units together with integrated infrastructure, neighbourhood centres, open space and ecological restoration areas. The proposal therefore consolidates growth within a logical urban expansion area, rather than resulting in dispersed rural fragmentation. While the NPS-HPL requires reliance on regional-scale NZLRI mapping, the detailed soil and LUC assessment (refer to Appendix 29) provides relevant contextual information confirming that not all of the site comprises LUC 1–3 land, with substantial portions identified as LUC 4 and LUC 6 land, together with non-productive areas. At a broad level, approximately 60% of the site comprises LUC 2 land, while the remaining approximately 40% comprises LUC 4–6 land and non-productive areas. The assessment also identifies extensive wetness limitations, peat soils and erosion constraints across the site. While this does not alter the application of the NPS-HPL, it indicates that significant portions of the site are unlikely to

Objective / Policy	Comment
	ultimately be mapped as highly productive land once the regional council completes the required mapping exercise. The proposal also responds directly to identified housing demand within Hamilton and the wider Waikato region and will provide substantial residential capacity in a location capable of being efficiently serviced. While not specific to this proposal, the NPS-HPL does provide pathways to allow for urban uses on HPL where there is a need to provide for sufficient development capacity. In summary, while the proposal involves the loss of some land currently treated as highly productive land, it is considered to generally align with the broader intent of Policy 4 due to: • the strategic urban location of the site adjoining Hamilton’s urban boundary; • the efficient and integrated urban form proposed; • the avoidance of dispersed rural fragmentation; • the significant identified housing need; • the constraints on the land impacting its ability to be used for primary production activities; and • the contextual evidence confirming that substantial portions of the site are constrained, non-productive, or comprise land outside LUC 1–3.
Policy 5 The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement.	The proposal does not include urban rezoning of the land.
Policy 6	The proposal does not include rezoning or the development of the land for rural lifestyle living purposes.

Objective / Policy	Comment
The rezoning and development of highly productive land as rural lifestyle is avoided, except as provided in this National Policy Statement.	
Policy 7 The subdivision of highly productive land is avoided, except as provided in this National Policy Statement.	Policy 7 of the NPS-HPL seeks to avoid the subdivision of highly productive land, except in limited circumstances provided for within the National Policy Statement. The Brymer proposal does involve the subdivision of land currently treated as highly productive land under the transitional provisions of the NPS-HPL. However, it is noted that under Clause 3.10 of the NPS-HPL, subdivision may be allowed if: • the land is subject to permanent or long-term constraints making primary production economically unviable; • Fragmentation is avoided; • Reverse sensitivity effects are mitigated; and • The overall benefits of development outweigh the costs associated with the loss of highly productive land. Given the policy direction in the NPS-HPL set out above, the proposal is considered to generally align with the intent of Policy 7 because the site is subject to permanent and long-term constraints that materially limit its productive capacity, and the subdivision forms part of a comprehensive and integrated urban expansion area adjoining Hamilton’s existing urban boundary. Given this, the overall benefits of the development outweigh the costs associated with the loss of the highly productive land on the site. The proposal is supported by evidence confirming that the site is subject to permanent and long-term constraints affecting its productive capacity, including extensive wetness limitations, peat soils, erosion constraints and non-productive areas. In addition, while the NPS-HPL requires reliance on the existing regional-scale NZLRI mapping, the detailed soil and LUC assessment provides contextual

Objective / Policy	Comment
	information confirming that approximately 40% of the site comprises LUC 4–6 land and non-productive areas. The Rural Productivity Assessment (refer to Appendix 29) confirms that the Site is subject to permanent and long-term constraints that materially limit productive capacity. Wetness is the dominant limitation, with poorly drained soils, seasonal high water tables, flooding, peat soils and erosion constraints reducing land-use versatility and restricting sustainable cropping. AgFirst considers pastoral grazing to be the highest and best reasonably practicable productive use of the Site. Importantly, even under that use, the Site is not economically viable. AgFirst identifies a deficit of approximately \$177,416 using a typical debt-servicing proxy and concludes that there are no reasonably practicable land-based primary production options capable of overcoming the Site’s physical and economic constraints. The Site’s immediate relationship with Hamilton also creates enduring reverse sensitivity and operational constraints for rural activities. In this context, enabling urban development on land with demonstrably constrained productive potential is a pragmatic outcome that can help meet identified housing demand while reducing pressure for urbanisation of larger, more cohesive and genuinely highly productive rural land elsewhere. The proposal also avoids the type of dispersed rural-residential fragmentation that Policy 7 seeks to prevent by consolidating development within a single integrated urban expansion area capable of being efficiently serviced by infrastructure and transport networks. The Economic Assessment (refer to Appendix 30) confirms that the benefits of the proposal materially outweigh the costs associated with the loss of productive land. Hamilton is projected to face a greenfield housing shortfall of approximately 1,900 dwellings in the medium term and 6,700 dwellings in the long term. Brymer will provide approximately 1,046 dwellings, with the full development expected to

Objective / Policy	Comment
	represent a net addition to housing supply in the long term. The development is also expected to generate approximately \$552 million in construction expenditure, \$278 million in value added and 4,736 job-years of employment, together with significant ongoing household expenditure and wider economic activity. By contrast, the discounted value of foregone rural production is estimated at only approximately \$628,000 to 2055, and the land is expected to operate at a loss once production costs are taken into account. Accordingly, the comparatively limited productive value foregone is substantially outweighed by the housing, employment and wider economic benefits of the proposal, supporting the conclusion that the subdivision is appropriate under the Clause 3.10 pathway. In summary, while the proposal involves the subdivision of some land currently treated as highly productive land, it is considered to align with the intent of Policy 7 because: • the site is subject to permanent and long-term constraints affecting productive capacity; • the proposal forms part of a comprehensive and integrated urban expansion adjoining Hamilton’s existing urban area; • the development avoids fragmented or ad hoc rural subdivision patterns; and • the proposal supports efficient urban growth and infrastructure delivery in response to identified housing demand. On balance, for the reasons outlined above, the proposal is considered to generally align with the broader intent of Policy 7.

Objective / Policy	Comment
Policy 8 Highly productive land is protected from inappropriate use and development.	Policy 8 of the NPS-HPL seeks to protect highly productive land from inappropriate use and development. While the proposal involves the urban development of some land currently treated as highly productive land under the transitional provisions of the NPS-HPL, the proposal is considered to be consistent with the intent of Policy 8 when assessed against the exemption pathway provided under Clause 3.10 of the NPS-HPL. Clause 3.10 provides that territorial authorities may allow the use and development of highly productive land where the land is subject to permanent or long-term constraints that mean the use of the land for land-based primary production is not economically viable, either on its own or together with other land. In this regard, the Brymer proposal is supported by evidence confirming that the site is subject to extensive and enduring constraints, including wetness limitations, peat soils, erosion constraints and non-productive areas. Further, while the NPS-HPL requires reliance on the existing regional-scale NZLRI mapping, the detailed soil and LUC assessment provides contextual information confirming that approximately 40% of the site comprises LUC 4–6 land and non-productive areas. This reinforces that the site does not comprise a wholly cohesive or versatile productive land resource and supports the conclusion that the land is affected by long-term productive constraints for the purposes of Clause 3.10. The Brymer site is located directly adjoining Hamilton’s existing urban boundary and established residential areas at Grandview Heights and Western Heights. The <i>Waikato Housing and Business Capacity Assessment</i> identifies a need for additional housing capacity to meet projected population growth and demand within Hamilton and the wider Waikato region. In this context, the proposal will provide a significant and timely supply of approximately 1,043 residential units, together with integrated infrastructure, neighbourhood centres, public open space and ecological restoration

Objective / Policy	Comment
	areas. The proposal therefore represents a logical and comprehensively planned urban expansion area capable of assisting in meeting identified housing demand in a coordinated and infrastructure-efficient manner, rather than resulting in isolated or ad hoc rural development. In summary, while the proposal involves the urban development of some land currently treated as highly productive land, it is considered to generally align with and be consistent with Policy 8 because: - the site is subject to permanent and long-term constraints affecting productive capacity, consistent with the exemption framework under Clause 3.10 of the NPS-HPL; - the proposal forms part of a coordinated and integrated urban expansion adjoining Hamilton's existing urban boundary; - the development avoids fragmented or ad hoc rural development patterns; and - the proposal responds to significant identified housing demand and supports efficient urban growth outcomes. On balance, the proposal is considered to be an appropriate form of development in the context of the site characteristics and exemption pathway anticipated under Clause 3.10 of the NPS-HPL.
Policy 9 Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land.	The Brymer development has been successfully designed to manage and mitigate reverse sensitivity effects on surrounding land-based primary production activities, consistent with Policy 9.

Objective / Policy	Comment
	The Brymer site is located directly adjoining Hamilton’s existing urban boundary and established residential areas at Grandview Heights and Western Heights. The proposal therefore represents a logical urban expansion area contiguous with the existing urban environment, rather than introducing isolated or dispersed residential development into a productive rural setting. Given the Brymer site adjoins established residential areas to the east, the eastern interface is already an urban residential edge rather than an interface with productive rural land uses. Accordingly, reverse sensitivity effects in the context of the NPS-HPL are unlikely to arise along that boundary because there are no adjoining land-based primary production activities that could be constrained by residential amenity expectations. The Brymer development has specifically been designed to manage and mitigate reverse sensitivity effects on surrounding land-based primary production activities to the west, in line with Policy 9. This includes: • The masterplan incorporates stormwater and recreation reserves, together with ecological restoration areas along parts of the rural interface to provide physical separation between future residential development and adjoining rural land uses. • Larger residential lots (generally 600sqm and above) have been positioned along the western boundary. These lots will also be subject to greater setback requirements from the boundary adjoining the existing rural activity. Together, these measures will help manage the potential reverse sensitivity effects, as well as any potential adverse scale and intensity effects of urban development adjoining rural land.

Objective / Policy	Comment
	- The provision of landscape planting buffers (on the adjacent residential lots), including specimen trees, will mature over time to provide a dense vegetated barrier and further assist in managing the potential reverse sensitivity effects. - The proposal consolidates development within a single comprehensively planned urban expansion area with integrated infrastructure, transport networks and public open space, avoiding fragmented or ad hoc rural-residential development patterns that typically create greater reverse sensitivity risk. Reverse sensitivity effects are therefore actively managed through the density/intensity setback controls, landscape planting buffer and integrated design. On balance, it is considered unlikely that the development will materially constrain existing or future land-based primary production activities on surrounding highly productive land. The proposal is therefore considered to generally align with the intent of Policy 9 of the NPS-HPL.

National Policy Statement for Natural Hazards 2025

Objective / Policy	Comment
Objective (1) Natural hazard risk to people and property associated with subdivision use and development is managed using a risk-based proportionate approach.	The Brymer development has considered and applied a risk-based approach to the assessment and management of natural hazard risk, consistent with the Objective of the NPS-NH, as set out further below. <u>Flood Hazards</u> The proposed Brymer development is considered consistent with the Objective of the NPS-NH, as the flooding risks associated with subdivision and development have

Objective / Policy	Comment
	been identified and assessed using a risk-based approach, with the scale and nature of the proposed mitigation proportionate to the identified hazard. The flood assessment (refer to Appendix 13 and 14) has considered both the existing flood-prone environment and the potential for the development to alter flood behaviour, rather than relying only on mapped hazard information. Site-specific HEC-RAS modelling has assessed existing, post-development and sensitivity scenarios for the 1% AEP (100-year) event with climate change, taking into account upstream catchment inflows, existing drainage channels, the Ohote Basin drainage scheme, the Laxon Road floodgates and potential Waipā River backwater effects. This establishes the nature, location and severity of the flood hazard and provides the basis for designing the development response. The design proposed responds proportionately to that risk. Lower-lying development areas are raised to provide greater protection and reduce exposure to flooding; existing drainage corridors and overland flow paths are retained or accommodated; stormwater is attenuated through constructed wetlands and other devices; and post-development peak discharges are generally restricted to no more than 80% of pre-development flows. Residential buildings will also be required to provide 500 mm freeboard above the modelled 100-year flood level, providing an additional level of protection for vulnerable activities. Importantly, the flood assessment also considers residual and failure risk. The stormwater system has been tested under sensitivity scenarios, including blockage of primary stormwater devices, and the wider overland flow network is designed to safely convey flows through road corridors during extreme events. Modelling of the 100 year climate change event confirms that depth–velocity values remain below the adopted pedestrian and vehicle safety thresholds.

Objective / Policy	Comment
	The modelling demonstrates that flood behaviour across the wider area is generally unchanged or improved following development. While total runoff volume increases, peak discharge is reduced through attenuation and the predicted increase in downstream basin water level is only approximately 10 mm, which is assessed as not materially increasing flood risk to downstream properties. Accordingly, Brymer applies a risk-based and proportionate flood management response by first identifying the existing and future hazard, then avoiding or reducing exposure through landform design, managing residual risk through attenuation, controlled discharge and safe overland flow conveyance, and providing additional resilience through freeboard and sensitivity testing. The proposal is therefore considered consistent with the Objective of the NPS-NH. <u>Geotechnical Hazards</u> The proposed Brymer development is considered consistent with the Objective of the NPS-NH, as the geotechnical risks associated with subdivision and development have been identified and assessed using a risk-based and proportionate approach. Section 7.1 of the Geotechnical Investigation Report (GIR) (refer to Appendix 17) establishes a geohazard risk register that considers both the likelihood and consequence of identified hazards and then identifies appropriate mitigation and residual risk. The principal geotechnical hazards include liquefaction, cyclic softening, slope instability, expansive and compressible soils, settlement, uncontrolled fill and shallow groundwater. The response to those hazards is tailored to their nature and location. In particular, the GIR identifies elevated liquefaction and settlement risk in the low-lying parts of the Site and recommends that liquefaction-induced settlement and reduced bearing capacity be addressed through foundation design, while compressible soils are to be managed through preloading and consolidation prior to construction. Section 7.8

Objective / Policy	Comment
	confirms that the proposed slopes meet the required factors of safety under static conditions, with further detailed assessment required for retaining structures and lateral spreading as design progresses. Section 7.11 also identifies expansive soils and recommends engineered clay fill and specific foundation design to mitigate associated effects. Overall, the GIR concludes that the Site is suitable for the proposed development subject to the identified geotechnical recommendations, with further detailed design and monitoring where appropriate, demonstrating that natural hazard risks to people and property can be managed in a proportionate manner. This risk-based approach is further supported by the Geotechnical Effects Management Plan (GEMP) (refer to Appendix 18), which establishes a monitoring and response framework to manage potential effects associated with groundwater drawdown and load-induced ground settlement during construction. The GEMP provides for groundwater and settlement monitoring before, during and following construction, including monitoring of neighbouring critical infrastructure where potentially affected, with monitoring frequencies able to be adjusted in response to observed conditions. A Trigger Action Response Plan (TARP) establishes Green, Amber and Red trigger levels for groundwater drawdown and settlement, enabling progressively greater intervention where monitoring indicates that predicted effects are being approached or exceeded. In particular, Red level responses apply where settlement reaches potentially damaging magnitudes, including where differential settlement exceeds 1:300. Monitoring data will be assessed against anticipated effects and trigger levels so that trends can inform ongoing construction activities, with exceedances requiring notification and implementation of the specified contingency measures. The GEMP therefore provides an adaptive mechanism through which actual ground and groundwater responses can be verified against those predicted, and additional mitigation implemented where necessary,

Objective / Policy	Comment
	reinforcing the conclusion that natural hazard risks associated with the development can be managed using a risk-based and proportionate approach.
Policy 1 When considering natural hazard risk associated with subdivision, use or development, the risk level must be assessed using the risk matrix.	The natural hazard risks associated with the Brymer development have been identified and assessed using the risk matrix required by Policy 1 of the NPS-NH, as set out further below. <u>Flood hazards</u> The flooding risk associated with the subdivision and development has been assessed using the NPS-NH risk matrix, informed by detailed site-specific hydraulic modelling. The flooding assessment considers the 1% AEP (100-year) storm event including climate change, together with existing and post-development flood behaviour, overland flow paths and downstream effects. The modelling identifies the areas potentially exposed to flooding and has directly informed the proposed mitigation measures, including raising lower-lying development areas, maintaining and directing overland flow paths through the road network, providing attenuation and flood storage within constructed wetlands, and controlling post-development peak discharges. Residential buildings will also be required to achieve 500 mm freeboard above the modelled 100 year flood level. Following these measures, modelling demonstrates that flood behaviour across the wider area is generally unchanged or improved, with peak discharges reduced relative to pre-development conditions. The predicted increase in downstream basin water level during the 1% AEP climate-change event is approximately 10 mm, which is assessed as not materially increasing flood risk to downstream properties.

Objective / Policy	Comment
	The modelling also confirms that overland flow depth and velocity remain below the adopted safety thresholds for pedestrians and vehicles. On this basis, and following implementation of the proposed mitigation measures, the consequence of flooding is considered minor and the residual flood risk is assessed as low-medium under the NPS-NH risk matrix. Accordingly, the Project has identified and assessed the relevant flood hazard and determined the resulting risk level in accordance with the methodology required by Policy 1 of the NPS-NH. <u>Geotechnical hazards</u> The proposed Brymer development is considered consistent with Policy 1 of the NPS-NH from a geotechnical perspective, as the geotechnical hazards associated with the proposed subdivision and development have been assessed using a risk-based methodology. Section 7.1 of the GIR (refer to Appendix 17) establishes a geohazard risk register that assesses each identified hazard by reference to its likelihood and consequence, assigns an existing risk rating, identifies appropriate mitigation measures, and then determines the resulting residual risk. The assessment addresses relevant geotechnical hazards including seismicity and liquefaction, cyclic softening, slope instability, expansive and compressible soils, settlement, uncontrolled fill, erosion and shallow groundwater. Based on the Geohazard Risk Register in Section 7.1 of the GIR, the key natural geotechnical hazards and risk levels are: • Seismicity: risk rating 5. • Fault rupture: risk rating 5, with the risk considered low and no specific mitigation required.

Objective / Policy	Comment
	• Liquefaction: risk rating 12, reducing to 9 with mitigation through foundation design to account for liquefaction-induced settlement and reduced bearing capacity. • Lateral spreading: risk rating 5, with further assessment to be undertaken at detailed design once the final extent of earthworks is confirmed. • Cyclic softening: risk rating 5, reducing to 4 through consideration of reduced soil shear strengths in the slope stability assessment. • Slope instability / landslide: risk rating 8, with slope stability to be addressed through design and further detailed assessment, particularly around swales, stormwater ponds and elevated areas. • Expansive soils: risk rating 12, reducing to 9 through the use of engineered clay fill and appropriate foundation design. • Settlement / compressible soils: risk rating 20, reducing to 5 through ground improvement, including preloading and consolidation of low-lying areas prior to construction. • Groundwater effects: risk rating 8, with further stability assessment and mitigation to be incorporated at detailed design where required. The GIR demonstrates that the identified natural hazard risks can be appropriately managed through mitigation proportionate to the level and nature of risk. In particular, liquefaction is addressed through appropriate foundation design; risks associated with compressible soils and settlement through ground improvement, including preloading and consolidation; expansive soils through engineered clay fill and foundation design; and slope stability and groundwater-related risks through further engineering assessment and detailed design where required. Accordingly, the GIR provides a structured assessment of the likelihood, consequence,

Objective / Policy	Comment
	mitigation and residual risk associated with the relevant geotechnical hazards, demonstrating that these risks can be appropriately managed in a manner consistent with the risk-matrix approach required by Policy 1.
Policy 2 Natural hazard risk associated with subdivision, use and development must be managed using an approach that is proportionate to the level of natural hazard risk.	The Brymer development has adopted a proportionate approach to managing the natural hazard risks associated with the proposed subdivision, use and development, with the management response reflecting the nature and level of risk identified, consistent with Policy 2 of the NPS-NH, as set out further below. <u>Flood hazard</u> The proposed Brymer development is considered consistent with Policy 2, as the measures proposed to manage flooding are proportionate to the level of risk identified through the site-specific flood assessment and modelling. The Project has been designed to respond directly to the nature and location of the identified flood hazard. This includes raising lower lying parts of the Site to reduce flood risk, maintaining and providing safe overland flow paths, providing stormwater attenuation and flood storage within constructed wetlands, and controlling post-development peak discharges to generally no more than 80% of pre-development levels. Residential buildings will also be required to provide 500 mm freeboard above the modelled 100 year flood level, further reducing the risk of flooding to people and property. Importantly, the mitigation responds not only to flooding within the Site but also to the potential for development to affect surrounding land. The modelling demonstrates that post-development flood behaviour across the wider area is generally unchanged or improved, with attenuation reducing peak discharges and the predicted increase in downstream basin water level being approximately 10 mm, which is not considered to materially increase flood risk to downstream properties.

Objective / Policy	Comment
	Accordingly, the Project applies targeted engineering and design measures that are proportionate to the identified level of flood risk, while avoiding unnecessary constraints on areas where risk can be appropriately managed. The proposal is therefore considered consistent with Policy 2 of the NPS-NH. <u>Geotechnical hazards</u> The proposed Brymer development is considered consistent with Policy 2 of the NPS-NH, as the geotechnical risks associated with the proposed subdivision and development have been assessed and are proposed to be managed through measures proportionate to the nature and level of each identified risk. Section 7.1 of the GIR (refer to Appendix 17) identifies the relevant geotechnical hazards, assesses their likelihood and consequence, assigns risk ratings, and identifies mitigation measures and resulting residual risks. This enables the engineering response to be targeted to the particular risk, rather than applying a uniform approach across the Site. In particular, the higher risks identified in the GIR are subject to specific mitigation measures. Liquefaction (risk rating 12) is reduced through foundation design that accounts for liquefaction-induced settlement and reduced bearing capacity, while expansive soils (risk rating 12) are managed through engineered clay fill and appropriate foundation design. The highest identified risk, settlement associated with compressible soils (risk rating 20), is reduced to a residual risk rating of 5 through ground improvement, including preloading and consolidation prior to construction. Other risks, including slope instability and groundwater effects, are addressed through appropriate engineering design and further detailed assessment where required. Accordingly, the GIR demonstrates that the level of investigation, mitigation and further design response is commensurate with the level of identified

Objective / Policy	Comment
	geotechnical risk, consistent with the proportionate risk-management approach required by Policy 2.
Policy 3 Where subdivision, use or development is assessed as having very high natural hazard risk, that risk must be avoided.	The natural hazard risks associated with the proposed Brymer development have been assessed to determine whether any aspect of the proposed subdivision, use or development is subject to very high risk requiring avoidance under Policy 3 of the NPS-NH. <u>Flood hazard</u> No part of the Site has been identified as being subject to very high flood risk (refer to Appendix 13 and 14). In relation to flooding, detailed site-specific hydraulic modelling has assessed existing and post-development flood behaviour, including the 1% AEP (100 year) event with climate change, as well as overland flow paths, upstream catchment flows and downstream effects. The assessment has informed the design of the development, including raising lower-lying areas, maintaining existing drainage corridors and flow paths, providing stormwater attenuation and flood storage within constructed wetlands, controlling post-development peak discharges, and requiring appropriate minimum floor levels. The Infrastructure Report (refer to Appendix 13) also confirms that a sensitivity scenario assuming all primary stormwater devices are blocked has been modelled. Even under this worst-case scenario, the assessment indicates that flood risk can be appropriately managed, with only minor exceedances requiring further refinement through detailed design. Accordingly, while flooding is an identified natural hazard that requires management as part of the development, no part of the Site has been assessed as having very high natural hazard risk from flooding. Policy 3 does not therefore require avoidance of subdivision, use or development on flooding grounds, and the

Objective / Policy	Comment
	identified flood risks can be appropriately managed through the proposed design and mitigation measures. <u>Geotechnical hazards</u> The proposed Brymer development is considered consistent with Policy 3 of the NPS-NH from a geotechnical perspective. The GIR (refer to Appendix 17) assesses the relevant geotechnical hazards using a likelihood and consequence framework and does not identify any geotechnical natural hazard as presenting a very high risk that would require avoidance. The principal higher risks identified include liquefaction and expansive soils (risk rating 12) and settlement associated with compressible soils (risk rating 20), with each capable of being reduced through appropriate mitigation. In particular, liquefaction risk is addressed through foundation design, expansive soils through engineered clay fill and appropriate foundation design, and settlement through ground improvement, including preloading and consolidation, reducing the settlement residual risk rating from 20 to 5. Slope stability and groundwater-related risks are similarly addressed through engineering design and further assessment where required. Accordingly, the GIR demonstrates that the identified geotechnical hazards can be appropriately mitigated and managed and no very high geotechnical natural hazard risk has been identified that requires the subdivision or development to be avoided, consistent with Policy 3.
Policy 4 Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.	The Brymer development has been designed and assessed to ensure that the proposed subdivision, use and development, including associated mitigation measures, do not create or increase significant natural hazard risk on other sites, in relation to both flooding and geotechnical hazards, consistent with Policy 4 of the NPS-NH. Further detail is provided below.

Objective / Policy	Comment
	<u>Flood hazard</u> In relation to flooding, particular consideration has been given to whether changes to landform and stormwater runoff could increase flood risk on adjoining or downstream land (refer to Appendix 13 and 14). The hydraulic assessment extends beyond the Site to consider the existing downstream flood-prone areas, the Ohote Basin Drainage Scheme, Laxon Road floodgates and potential Waipā River backwater effects. The modelling considers existing and post-development conditions, including the 100 year event with climate change, to understand whether development would worsen downstream flooding. The stormwater system has been designed to avoid or mitigate this risk through on-site retention and attenuation, constructed wetlands and flood storage, retention of existing flow paths and discharge locations, and controlled discharge of post-development flows. Peak discharges are generally limited to no more than 80% of pre-development levels, with external catchment flows also accounted for so that downstream effects are not worsened. The Stormwater Management Plan (refer to Appendix 14) concludes that the proposed system can achieve discharge rates below the adopted design targets and provides an integrated response that maintains catchment function while managing downstream flood risk. Accordingly, the proposal is not expected to create or increase significant flood risk on other sites. To the extent that any residual effects arise, the proposed stormwater and flood management measures provide a proportionate response to those effects. The proposal is therefore considered consistent with Policy 4 of the NPS-NH. <u>Geotechnical hazards</u>

Objective / Policy	Comment
	The proposed Brymer development is considered consistent with Policy 4 of the NPS-NH from a geotechnical perspective. The GIR (refer to Appendix 17), as the Geotechnical Investigation Report (GIR) identifies and assesses geotechnical hazards associated with the proposed development and provides mitigation measures to manage those risks. The GIR identifies relevant hazards including liquefaction, lateral spreading, slope instability, settlement and groundwater effects, with the proposed earthworks, slopes, retaining structures and stormwater ponds subject to geotechnical assessment and design. In particular, the slope stability assessment considers static, elevated groundwater and seismic conditions and confirms that the proposed slopes meet the required factors of safety under static conditions, with further assessment of retaining structures and lateral spreading to be undertaken at detailed design. The GIR also identifies measures to manage risks associated with groundwater, erosion and ground settlement, including stability assessment and mitigation at detailed design, geotechnical construction monitoring and ground improvement in compressible areas. These measures provide a proportionate engineering response to potential geotechnical effects arising from the development. The GIR does not identify the proposed development or associated mitigation as creating or increasing a significant geotechnical natural hazard risk on adjoining sites, subject to implementation of its recommendations and the further assessment and detailed design identified in the report. Accordingly, the proposal is considered consistent with Policy 4.
Policy 5 Natural hazard risk assessment and decisions must be based on the best available information and must be made even when that information is uncertain or incomplete.	The assessment of natural hazard risk associated with the Brymer development has been informed by the best available information for both flooding and geotechnical hazards, while recognising and appropriately responding to areas of uncertainty, consistent with Policy 5 of the NPS-NH. <u>Flood hazard</u>

Objective / Policy	Comment
	In relation to flooding, the assessment draws on a combination of site-specific survey information, NIWA rainfall data, Waikato Regional Council information, WRC guidelines and RITS, the Ohote Basin Land Drainage Management Plan, and detailed hydrological and HEC-RAS 2D hydraulic modelling (refer to Appendix 13 and 14). The modelling considers existing and post-development conditions, external catchment flows, existing drainage features and the 2, 10 and 100 year rainfall events, including the RCP8.5 climate-change scenario. The assessment has also appropriately addressed areas where information is incomplete. In particular, while detailed operational information for the Laxon Road floodgates was unavailable, representative operating assumptions were developed through consultation with Waikato Regional Council and incorporated into the hydraulic model. WRC's modelled 100 year climate-change water levels for the Waipā River were also used to verify the downstream boundary conditions adopted in the assessment. The modelling has additionally included sensitivity testing to understand flood behaviour under different conditions and provide confidence that the proposed mitigation remains appropriate. Accordingly, the flood risk assessment is based on the best available site specific, regional and technical information, with reasonable assumptions and sensitivity testing used where information is uncertain or incomplete. This provides an appropriate basis for decision-making and is considered consistent with Policy 5 of the NPS-NH. <u>Geotechnical hazards</u> The proposed Brymer development is considered consistent with Policy 5 of the NPS-NH in relation to geotechnical considerations. The GIR (refer to Appendix 17), demonstrates that the assessment of geotechnical risk has been based on detailed

Objective / Policy	Comment
	site investigations and recognised geotechnical assessment methodologies. The GIR draws on site-specific investigations, including CPT testing, groundwater data, laboratory testing and geophysical information, and applies recognised MBIE/NZGS guidance and engineering methodologies to assess seismicity, liquefaction, cyclic softening, slope stability, settlement and other relevant geotechnical hazards. The GIR also appropriately recognises areas of uncertainty and identifies where further investigation or assessment is required as the design progresses. For example, further assessment of lateral spreading is required once the final extent of earthworks is confirmed, while retaining wall and global slope stability will be reassessed during detailed design. This does not prevent natural hazard risks from being assessed and managed at the current stage; rather, the GIR adopts conservative assumptions where appropriate and establishes recommendations for subsequent detailed design. Accordingly, decisions on geotechnical natural hazard risk can be made on the best available information, while providing for identified uncertainties to be appropriately addressed as the development progresses, consistent with Policy 5.
Policy 6 The potential impacts of climate change to at least 100 years into the future must be considered.	The Brymer development has considered the potential effects of climate change on natural hazard risk over at least a 100-year timeframe in relation to both flooding and geotechnical hazards, consistent with Policy 6 of the NPS-NH. <u>Flood hazard</u> In relation to flooding, the Stormwater Management Plan (refer to Appendix 13 and 14) specifically incorporates future climate change into the hydrological and hydraulic assessment. The modelling considers the 2, 10 and 100 year rainfall events and adopts the RCP8.5 climate-change scenario for 2100–2120, including a 100-year

Objective / Policy	Comment
	climate change rainfall depth of 195 mm over 24 hours, compared with 145 mm under the historical scenario. The climate change scenario has been incorporated into the assessment of both existing and post-development flood behaviour, enabling the potential effects of the development on the Site and surrounding environment to be assessed under the same future rainfall conditions. The assessment also includes sensitivity testing and considers downstream constraints, including the Ohote Basin Drainage Scheme and Waipā River backwater effects. The resulting design provides for safe overland flow paths, appropriate building levels, stormwater attenuation and controlled discharge to manage future flood risk. Accordingly, the flood assessment does not rely solely on present day conditions but expressly considers the potential effects of climate change through to 2100–2120, thereby addressing a timeframe of at least 100 years. The proposal is therefore considered consistent with Policy 6 of the NPS-NH. <u>Geotechnical hazards</u> The proposed Brymer development is considered consistent with Policy 6 of the NPS-NH insofar as it relates to geotechnical hazards. The GIR assesses the Site under a range of conditions relevant to its long-term performance, including seismic loading, liquefaction, slope stability, groundwater conditions, settlement and expansive soils. In particular, slope stability has been assessed under both normal groundwater and transient/elevated groundwater conditions, with the latter applying elevated pore-water pressures to test the performance of proposed slopes under less favourable conditions. The GIR also identifies shallow groundwater as a relevant geotechnical constraint requiring consideration through detailed design and mitigation. While the GIR does not expressly undertake a 100-year climate

Objective / Policy	Comment
	change assessment, its assessment of elevated groundwater conditions and requirement for further groundwater and stability assessment at detailed design provide a framework through which potential climate-related changes relevant to geotechnical risk can be addressed. Accordingly, to fully demonstrate consistency with Policy 6, the detailed design process should ensure that any reasonably foreseeable climate-change-related effects on groundwater conditions, slope stability and associated geotechnical hazards over at least a 100-year timeframe are incorporated into the final geotechnical design.

National Policy Statement for Infrastructure 2025

Objective / Policy	Comment
Objective (1) The objective of this National Policy Statement is to: (a) ensure the national, regional and local benefits of infrastructure are provided for; (b) enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety; (c) enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations; (d) ensure infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities; and (e) ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.	The Brymer proposal includes a substantial programme of development supporting infrastructure, comprising new and upgraded transport, water supply, wastewater and stormwater infrastructure. This includes connections to the existing IAWAI water and wastewater networks, new wastewater pump stations and connections ultimately to the Western Interceptor, a proposed 6 million litre water reservoir and associated bulk and distribution mains, an integrated stormwater management network, and new roads, walking, cycling and public transport infrastructure. The development will be progressively integrated with the adjoining urban infrastructure networks, with agreed public infrastructure intended to be vested in the relevant infrastructure provider. The proposal is considered to be consistent with the Objective of the NPS-I. In particular, the proposed infrastructure: Will provide local and regional benefits by delivering substantial new three-waters and transport infrastructure to support urban growth on Hamilton's

Barker & Associates

+64 375 0900 | admin@barker.co.nz | barker.co.nz

Kerikeri | Whangārei | Warkworth | Auckland | Hamilton | Cambridge | Tauranga | Havelock North | Wellington | Christchurch | Wānaka & Queenstown

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	western edge. The proposed water infrastructure includes a 6 million litre reservoir, bulk feeder and distribution mains, with parts of the network capped to enable future connections. Wastewater infrastructure will ultimately connect directly to the Western Interceptor. These solutions have been developed having regard to both Brymer and the wider network context. • Will support the social and economic wellbeing, health and safety of people and communities by providing the potable water, wastewater, stormwater and transport infrastructure necessary to enable approximately 1,043 new homes and supporting commercial activities. Water infrastructure will also provide appropriate firefighting supply, while the transport network incorporates footpaths, dedicated cycleways and provision for public transport. • Will support the development and changing needs of the urban environment through infrastructure that is planned as part of a comprehensive urban expansion adjoining Hamilton. The infrastructure has been designed to integrate with existing networks while providing additional capacity and connections to support the development over time. • Has been designed to be well-functioning, resilient and compatible with surrounding activities, including through network modelling, emergency wastewater storage, looped water connections, integrated stormwater treatment and attenuation, safe overland flow paths and a connected multi-modal transport network. • Will be delivered in a timely and efficient manner through the staged development of Brymer, with infrastructure progressively provided as required to service each stage. For example, interim water and wastewater connections enable the initial stages, followed by delivery of the ultimate strategic infrastructure as development progresses. This staged approach ensures

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	infrastructure investment is coordinated with development demand while the proposed conditions provide a framework for managing infrastructure delivery and associated environmental effects. Overall, the Brymer infrastructure package provides a coordinated and staged framework for supporting significant urban growth, while integrating with and contributing to the wider infrastructure network. The proposal is therefore considered consistent with the Objective of the NPS-I.
Policy 1: Providing for the benefits of infrastructure (1) Decision-makers must ensure that the national, regional or local benefits of infrastructure, relative to any localised adverse effects on the environment, are recognised and provided for. (2) Decision-makers must recognise that the benefits of infrastructure include: (a) providing for the social, cultural and economic wellbeing of present and future generations; (b) creating, supporting and enhancing well-functioning urban and rural environments; (c) supporting sufficient development capacity to meet demand for housing and business land; (d) providing services that are essential to support human life and the development, growth and functioning of districts, regions, New Zealand and the economy; (e) helping to protect and restore the natural environment; (f) supporting New Zealand's emissions reduction targets and mitigating the effects of climate change; and (g) reducing the risks from, and improving resilience to, natural hazards and climate change.	As outlined above, the proposal includes development supporting infrastructure which will realise a number of local and wider network benefits as set out in the Infrastructure Report (refer to Appendix 13). The infrastructure has been comprehensively planned to support the Brymer development while integrating with existing Hamilton infrastructure networks and, in some instances, providing capacity and connections that can support future development beyond the site. In particular, the benefits include: • Providing for the social and economic wellbeing of people and communities, as well as their health and safety, in particular future residents within the Brymer development and the wider Hamilton urban area, through the provision of essential water supply, wastewater, stormwater and transport infrastructure; • The construction of a new 6 million litre Brymer water reservoir, together with associated bulk and distribution mains. The reservoir is proposed to supplement the constrained Dinsdale Reservoir and will provide the long-term water supply necessary to service the later stages of Brymer. The associated watermain infrastructure is also proposed to be capped at strategic locations for future connections, providing potential wider network benefits and supporting future urban growth.

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(3) Decision-makers must recognise: (a) the significant risks to, and impacts on, public safety, the wellbeing of people and communities, and the environment that may occur when infrastructure services are compromised; and (b) that infrastructure networks can be both independent and interconnected.	• Supporting sufficient development capacity for residential and commercial activities, with the infrastructure package providing a servicing framework for approximately 1,043 residential units and 2,184 m² of commercial floor area. The provision of this infrastructure will therefore contribute to meeting demand for housing and supporting growth within the wider Hamilton urban environment; • Contributing to a well-functioning urban environment through the coordinated provision of three-waters and a connected multi-modal transport network. The proposal includes walking and cycling connections, public transport provision and connections with the surrounding urban area, alongside the essential servicing infrastructure required to support the proposed residential and commercial activities; • Providing a resilient and integrated stormwater management system which incorporates on-lot soakage, public piped networks and artificial wetlands. The wetlands provide water-quality treatment, extended detention and attenuation of peak flows up to the 100-year storm event, including climate change, reducing downstream flooding risk and protecting receiving environments. The proposal will also protect and enhance existing drainage corridors that form part of the wider Waikato Regional Council drainage network. • Recognising the interconnected nature and importance of infrastructure networks through the proposed staged connections to the existing Hamilton water and wastewater networks, including the ultimate wastewater connection to the Western Interceptor. Wastewater pump stations incorporate emergency storage and have been designed for short- and long-

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	term requirements, including space for additional storage if required in the future. Overall, the proposed infrastructure is integral to enabling the Brymer development and will provide significant local benefits, together with benefits to the wider infrastructure network and future urban growth. The infrastructure has been designed and staged to appropriately manage effects on existing networks and the receiving environment, with the Infrastructure Report concluding that, subject to the proposed conditions and staged delivery framework, the development can proceed without generating adverse effects on existing infrastructure or the receiving environment. Accordingly, the proposal is considered to be consistent with Policy 1 of the NPS-I.
Policy 2: Operational need or functional need of infrastructure to be in particular locations and environments (1) Decision-makers must recognise that infrastructure may have an operational need or functional need to operate in, be located in, or traverse particular locations and environments. (2) Decision-makers must recognise that the operational need or functional need of infrastructure includes, but is not limited to, the need to: (a) provide services to people and communities in a timely, effective and efficient manner; (b) operate effectively and efficiently as linear and/or interconnected infrastructure networks within and across district and regional boundaries; (c) access or connect to particular natural or physical resources, including other infrastructure; (d) be accessible so infrastructure activities can be undertaken effectively and efficiently;	The proposed infrastructure has an operational and functional need to be located within and traverse the Brymer site, and to connect with existing infrastructure outside the site, in order to efficiently service the development and integrate it with the wider Hamilton infrastructure network. In particular, the proposed infrastructure strategy as set out in the Infrastructure Report (refer to Appendix 13) provides for the effective and efficient operation of an interconnected three waters and transport network. Water supply and wastewater infrastructure will connect to the existing IAWAI reticulated networks, while internal pump stations, storage, reservoirs and mains will be progressively established as development is staged. Stormwater infrastructure also has a functional need to respond to the site's existing topography and hydrology, with the proposed system integrating treatment, attenuation and conveyance with wetlands, watercourses and existing drainage corridors.

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(e) locate where the services are required, including in areas at risk to natural hazards, whether the infrastructure has been spatially identified in advance; and (f) manage risks from natural hazards.	The location of key infrastructure has also been informed by the need to connect efficiently with existing physical infrastructure. For example, the proposed 6 million litre reservoir will connect to the existing bulk watermain at Brymer Road, while the ultimate wastewater solution provides for connection to the Western Interceptor. Wastewater pump stations are located to efficiently service their respective catchments and are elevated and positioned away from identified overland flow paths and flood-prone areas to improve resilience to natural hazards. Importantly, the infrastructure is not designed solely in isolation for individual development stages. The proposed water network includes mains that will be capped at strategic locations for future connections, providing the potential to support future urban growth and wider network outcomes. This is particularly relevant given that Brymer is located within Waikato District but directly adjoins Hamilton City and forms part of the wider Hamilton functional urban area. Overall, the location and configuration of the proposed infrastructure reflects its functional and operational requirements to efficiently service Brymer, connect with existing networks, respond to the physical characteristics of the site, and provide for future network connections where appropriate. The proposal is therefore considered consistent with Policy 2 of the NPS-I.
Policy 3: Considering spatial planning (1) Decision-makers must: (a) have regard to the extent to which the infrastructure has been identified within a strategic planning document, while recognising that not all infrastructure can be spatially identified in advance; and (b) consider relevant spatial plans and master plans prepared by the infrastructure provider and provided to the decision-maker.	The proposed Brymer infrastructure has been considered in the context of the relevant strategic and spatial planning framework, while recognising that the Site itself is not currently identified as a growth area within Future Proof or the relevant Hamilton-Waikato growth planning documents. Notwithstanding this, Brymer is located directly adjoining the existing Hamilton urban area and established urban infrastructure. The proposed infrastructure has therefore been planned to integrate with existing and planned infrastructure

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	networks, rather than operate as a standalone servicing solution. In particular, the Infrastructure Report (refer to Appendix 13) confirms that water and wastewater servicing has been developed through strategic workshops with Hamilton City Council and IAWAI, including consideration of alternative connection options, existing network constraints and future servicing requirements. The preferred infrastructure strategy reflects that coordination. Water supply will progressively connect to the existing Hamilton network, with a new reservoir and associated bulk infrastructure ultimately servicing the development, while the preferred wastewater solution provides for connection to the Western Interceptor. The wider Brymer masterplan (refer to Appendix 6) also integrates three-waters, transport, open space and ecological infrastructure within a coordinated and staged development framework. Accordingly, while Brymer and its supporting infrastructure are not specifically spatially identified in the existing strategic growth framework, the proposed infrastructure has been developed having regard to that wider planning context and through direct coordination with the relevant infrastructure providers. This is consistent with Policy 3, which expressly recognises that not all infrastructure can be spatially identified in advance.
Policy 4: Enabling the efficient and timely operation and delivery of infrastructure activities (1) Decision-makers must: (a) enable the efficient and timely delivery of infrastructure activities; (b) enable cross-boundary infrastructure networks; (c) provide flexibility for infrastructure providers to use new or innovative technologies and methods to improve the delivery of infrastructure services and/or improve environmental outcomes;	The Brymer proposal is considered to be consistent with Policy 4 of the NPS-I, as the infrastructure strategy provides for the efficient and timely delivery of infrastructure required to support the development, while integrating with and making effective use of existing infrastructure networks. In particular: • The development will be delivered through a multi-staged framework, with water, wastewater, stormwater and transport infrastructure progressively

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(d) enable opportunities to make more effective use of existing infrastructure; (e) consider opportunities for continuous improvement in service delivery and environmental outcomes when renewing or replacing resource consents; and (f) enable the upgrading of infrastructure where this will: (i) improve the resilience of infrastructure to the risks from natural hazards and effects of climate change; (ii) maintain or improve its level of infrastructure service, including to meet increasing demand; or (iii) improve environmental outcomes. (2) Decision-makers must: (a) recognise it is the role of the infrastructure provider to identify the preferred location for the infrastructure activity; and (b) have regard to existing information and assessments undertaken by the infrastructure provider, including, but not limited to, information prepared using the Better Business Cases methodology developed by The Treasury New Zealand, infrastructure strategies prepared under the Local Government Act 2002, or the Infrastructure Priorities Programme developed by New Zealand Infrastructure Commission Te Waihanga.	delivered alongside each stage. This enables infrastructure investment and delivery to be coordinated with development while ensuring that each stage is appropriately serviced. • The proposal enables cross-boundary infrastructure connections, which is particularly relevant given that Brymer is located within Waikato District but directly adjoins Hamilton City. Water and wastewater infrastructure will connect to the IAWAI reticulated networks, with the servicing strategy developed through engagement with Hamilton City Council and IAWAI. This includes the ultimate wastewater connection to the Western Interceptor and the proposed water reservoir and associated bulk water infrastructure. • The infrastructure strategy makes effective use of existing infrastructure where capacity is available, while providing new or upgraded infrastructure where necessary to accommodate additional demand. The proposed infrastructure also provides opportunities for future connections, supporting integration with the wider network rather than establishing isolated infrastructure solely for Brymer. • The proposed stormwater system incorporates a best practice and integrated treatment train approach, including on-lot soakage, artificial wetlands, high-flow bypasses, attenuation and the protection and enhancement of existing drainage corridors. The system is designed to manage water quality and quantity while providing opportunities for ecological enhancement and future maintenance. This approach is also consistent with the sustainability and efficiency hierarchy contained within RITS. • The proposed infrastructure has been designed to provide resilience to natural hazards and climate change, including through stormwater attenuation for events up to the 100 year storm including climate change, preservation of

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	existing flow paths and consideration of external catchment flows. The detailed design process also provides an opportunity for further refinement and value engineering as the infrastructure is progressively delivered. Overall, the proposed infrastructure provides a coordinated, flexible and staged servicing solution that makes effective use of existing networks while delivering the additional infrastructure required to support Brymer and integrate with the wider urban area. Accordingly, the proposal is considered consistent with Policy 4 of the NPS-I.
Policy 5: Recognising and providing for infrastructure supporting activities (1) Decision-makers must recognise and provide for the role of infrastructure supporting activities, including by: (a) recognising the importance of infrastructure supporting activities to enable the benefits of infrastructure activities to be realised; (b) recognising the operational need or functional need of some infrastructure supporting activities, including supporting quarrying activities to operate in, be located in, or traverse particular environments and locations; and (c) enabling the timely delivery of infrastructure supporting activities.	The project recognises and provides for the supporting activities necessary to enable the proposed infrastructure to be constructed, operated and maintained, and for its wider benefits to be realised. The Brymer proposal as addressed in the Infrastructure Report (refer to Appendix 13) includes a range of infrastructure supporting activities, including staged earthworks and site formation, cut and fill, retaining, erosion and sediment control, the establishment of infrastructure corridors and access, and the undergrounding of existing power lines. These works are necessary to establish suitable development platforms and enable the coordinated construction of the transport and three-waters networks. The supporting activities are also closely integrated with the infrastructure they serve. For example, the stormwater network includes artificial wetlands, modified drains and channels, high-flow bypasses, forebays and on-lot retention devices, together with maintenance access and riparian planting areas. These components collectively enable the stormwater system to perform its water-quality, attenuation, conveyance and ecological functions over the long term.

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	Importantly, these supporting activities will be delivered progressively alongside the staged development and associated infrastructure, ensuring each stage is appropriately serviced and integrated with the wider development. The proposed consent framework will provide for the coordinated construction, staging, servicing and operation of the infrastructure and associated works. Accordingly, the proposal recognises that these supporting activities are integral to the timely and effective delivery and ongoing functioning of the Brymer infrastructure, and is therefore considered consistent with Policy 5 of the NPS-I.
Policy 6: Recognising and providing for Māori interests (1) Decision-makers must recognise and provide for Māori interests in relation to infrastructure activities and infrastructure supporting activities, including by: (a) taking into account the outcome of any engagement with tangata whenua on any relevant resource consent, notice of requirement, or request for a private plan change; (b) recognising the opportunities tangata whenua may have in developing and operating their own infrastructure at any scale or in partnership; and (c) local authorities: (i) providing opportunities for tangata whenua involvement where infrastructure and infrastructure supporting activities may affect a site of significance or issue of cultural significance to Māori; and (ii) operating in a way that is consistent with any relevant iwi participation legislation or Mana Whakahono ā Rohe.	Māori interests have been recognised and provided for through engagement with tangata whenua and the consideration of cultural values in the planning, design and management of the Brymer development, including its infrastructure and infrastructure supporting activities. Tangata whenua, including Ngāti Māhanga and Waikato Tainui, have been engaged through the development of the project. A CIA (refer to Appendix 24) has been prepared by Ngāti Māhanga as mana whenua and is supported by the Mana Whenua Statement and Engagement Report, which records the engagement undertaken and matters raised through that process. The CIA specifically considers infrastructure alongside hydrology, ecology, landscape and other technical matters and is intended to inform decision-making and appropriate consent conditions. Of particular relevance to infrastructure, the CIA identifies the importance of wai, whenua, wetlands and the wider Waikato River catchment, including the hydrological and cultural connections between the Site's wetlands and waterways, the Ohote Stream and ultimately the Waikato River. These values as assessed in the Infrastructure Report (refer to Appendix 13) have been considered alongside the technical design of the three waters infrastructure, including the integrated

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	stormwater response incorporating treatment, attenuation, wetlands, watercourses and other water-sensitive design features. The Project therefore provides an opportunity for infrastructure to be delivered in a manner that recognises kaitiakitanga and tangata whenua values, including through the protection and enhancement of freshwater and ecological systems and ongoing involvement in environmental management. The CIA expressly identifies mitigation and cultural requirements relating to water and hydrology, wetlands and ecology, wastewater and infrastructure, urban design and cultural integration, and cultural monitoring. Accordingly, the infrastructure component of Brymer has been developed within a wider process of engagement with tangata whenua and recognition of Māori cultural values and interests, and the proposal is considered consistent with Policy 6 of the NPS-I.
Policy 7: Assessing and managing the effects of proposed infrastructure activities (1) When assessing and managing the effects of infrastructure activities, decision-makers must: (a) have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the selection of the route, site or method of undertaking the work; (b) consider the technical and operational requirements and constraints of infrastructure activities; (c) take into account the extent to which the effects of the infrastructure activities are different in scale, intensity, duration and frequency from the effects of existing infrastructure;	All infrastructure required to service the Brymer development has been comprehensively planned and assessed as part of the wider masterplan, with its location, scale and design informed by the physical characteristics of the Site, existing infrastructure networks, technical and operational requirements, and the need to avoid or mitigate adverse environmental effects. As the Infrastructure Report confirms (refer to Appendix 13), the proposed water supply, wastewater, stormwater and transport infrastructure has been appropriately designed and sized to accommodate the proposed development. Where practicable, infrastructure is located within the Site, with connections to existing external networks where operationally required. The infrastructure strategy also responds to site constraints, including existing wetlands, watercourses, groundwater conditions and flood-prone areas. For example, the stormwater

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(d) take into account relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies to assess and manage adverse effects; and (e) ensure that the mitigation measures and consent conditions are proportionate to the scale of adverse effects generated by the activity.	network has been designed to integrate treatment, attenuation and conveyance with wetlands, watercourses and stormwater reserves, while treated stormwater has been redirected to retained wetlands where necessary to maintain hydrological inputs. The design has been undertaken in accordance with relevant regional standards and recognised best-practice methodologies. In particular, the stormwater system has been designed in accordance with the Regional Infrastructure Technical Specifications (RITS) and Waikato Regional Council stormwater modelling and management guidelines. Erosion and sediment controls will also be implemented in accordance with Waikato Regional Council guidance to minimise construction-related effects on receiving waters. Potential adverse effects associated with the construction and operation of infrastructure will be managed through the staged delivery framework and proposed consent conditions, which address earthworks, three waters infrastructure, stormwater discharges, ecological effects, landscaping and other environmental effects. These measures provide an integrated framework to avoid, remedy or mitigate effects proportionate to their scale and nature. Above-ground infrastructure will also be integrated with the wider landscape and open-space strategy to appropriately manage visual and amenity effects. Importantly, the infrastructure will provide benefits beyond simply servicing individual lots within Brymer. It will connect with existing IAWAI water and wastewater networks and the wider transport network, while the proposed water infrastructure includes provision for future network connections. The stormwater and ecological infrastructure will also contribute to improved water-quality, flood-management and ecological outcomes within the wider receiving environment.

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	Overall, the infrastructure has been appropriately located, designed and assessed having regard to its operational requirements, relevant technical standards and environmental effects, with proportionate mitigation incorporated into the Project. The proposal is therefore considered consistent with Policy 7 of the NPS-I.
Policy 8: Operation, maintenance and minor upgrade of existing infrastructure (1) Decision-makers must enable the efficient operation and maintenance and minor upgrade of existing infrastructure, provided that, where practicable, adverse effects are avoided, remedied or mitigated.	Policy 8 is relevant to the extent that the Brymer development connects to and makes use of existing infrastructure networks, although the primary focus of the project is the provision of new development-supporting infrastructure. As set out in the Infrastructure Report (refer to Appendix 13), the proposed water supply and wastewater networks will connect to the existing IAWAI reticulated networks, with new internal infrastructure established progressively as development is staged. The Infrastructure Report confirms that the water servicing strategy has been developed in consultation with Hamilton City Council and IAWAI and makes use of existing infrastructure, including initial connections to existing watermains at Ayrshire Drive and Brymer Road and the existing bulk watermain terminating in Brymer Road. The Project will therefore require works associated with connecting to, integrating with and, where necessary, upgrading existing infrastructure. The proposed infrastructure has been designed in accordance with relevant technical standards, including RITS, and will be subject to the proposed consent conditions addressing construction, staging, servicing and operation. These measures will ensure that any adverse effects associated with works to existing infrastructure are appropriately avoided, remedied or mitigated. Accordingly, while Policy 8 is not a principal consideration for the Brymer proposal, the Project enables the efficient continued operation and integration of existing

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	infrastructure alongside the new infrastructure required to service Brymer. The proposal is therefore considered consistent with Policy 8 of the NPS-I.
Policy 9: Managing the effects of new infrastructure and major upgrades (1) Decision-makers must enable new infrastructure or major upgrades of existing infrastructure activities in all environments. (2) Where infrastructure activities are proposed to locate in or are likely to have adverse effects on environments and values provided for in section 6 of the Act, the provisions of this policy must be read alongside other relevant national direction, regional policy statements and regional and district plans. (3) Where (2) does not apply, the adverse effects of new infrastructure and major upgrades must be, where practicable, avoided, remedied or mitigated.	The proposal includes substantial new infrastructure required to support urban development within the Brymer site, including transport, water supply, wastewater and stormwater infrastructure. This infrastructure will primarily enable the Brymer development, while also integrating with the wider Hamilton infrastructure network and providing opportunities for wider network benefits, including through connections to the IAWAI networks and provision for future water network connections. The infrastructure has been comprehensively planned as part of the Brymer masterplan, with its location and design responding to the environmental features and constraints of the site. Of relevance to section 6 of the RMA, the site contains natural inland wetlands and modified watercourses. Accordingly, rather than stating that subsection (2) does not apply, I consider it more accurate to acknowledge that Policy 9(2) is relevant, particularly in relation to section 6(a). The proposal retains and integrates freshwater features within the wider blue-green network, with existing wetlands generally provided with setbacks and incorporated alongside stormwater infrastructure and ecological enhancement areas. Where infrastructure has the potential to affect freshwater features, those effects have been specifically assessed and managed through the EclA (refer to Appendix 23), Stormwater Management Plan (refer to Appendix 14) and Groundwater Effects Assessment (refer to Appendix 20). For example, the stormwater network has been redesigned to redirect treated stormwater into the upper reaches of retained gully wetlands and streams to mitigate potential reductions in recharge associated with development. The EclA also identifies residual effects associated with some watercourse loss and modification, for which compensation through the creation

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	and restoration of wetland and stream habitat is proposed, with the overall outcome for streams and wetlands expected to be net positive. More generally, the proposed infrastructure has been designed and assessed so that adverse effects are avoided, remedied or mitigated where practicable, with the proposed conditions providing an integrated framework for managing construction, staging, three-waters infrastructure, stormwater discharges and ecological effects. Overall, the proposal enables the new infrastructure necessary to support Brymer and contribute to the wider urban infrastructure network, while appropriately managing its environmental effects in accordance with the relevant freshwater national direction and regional planning framework. The proposal is therefore considered consistent with Policy 9 of the NPS-I.
Policy 10: Planning for and managing the interface and compatibility of infrastructure with other activities (1) Decision-makers on planning instruments must manage the interface between existing and planned infrastructure and other activities to ensure: (a) infrastructure and other activities are as compatible as practicable; (b) the safe, efficient and effective operation, maintenance and minor upgrades, and major upgrades of existing or planned infrastructure are not compromised by the adverse effects of other activities; and (c) infrastructure activities that are compatible with each other are co-located, while recognising that some types of infrastructure are not compatible. (2) Decision-makers on planning instruments must: (a) engage with infrastructure providers to: (i) understand their existing and planned infrastructure activities and medium to long-term plans;	The Brymer development has been comprehensively masterplanned so that the proposed infrastructure and surrounding land uses are integrated and compatible as far as practicable, while ensuring the safe and efficient operation, maintenance and future upgrading of infrastructure (refer to Appendix 13). The proposed transport and three-waters infrastructure has been planned alongside the residential, commercial, open space and ecological components of Brymer rather than being retrofitted following development. Water supply and wastewater infrastructure will connect to the existing IAWAI networks, while internal infrastructure, including pump stations, reservoirs and mains, will be progressively established as development occurs. Stormwater infrastructure is similarly integrated with the road, open space and blue-green networks, including through artificial wetlands, drainage corridors and other water-sensitive design features. The interface with sensitive residential activities has also been specifically considered. In particular, operational noise limits are proposed for wastewater

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(ii) identify appropriate buffers and other methods to protect existing and planned infrastructure from the adverse effects of new or intensified sensitive and incompatible activities, including direct effects, reverse sensitivity effects, and risks to health and safety; (iii) support the strategic integration of infrastructure with land use activities; (b) identify: (i) activities that are particularly sensitive to the effects of infrastructure; (ii) activities that are compatible with infrastructure, or potentially compatible with appropriate buffers, design standards or mitigation measures; (iii) infrastructure activities that are sensitive to the effects of other infrastructure; (c) apply a range of methods, including, where appropriate: (i) the use of buffers in plans to manage sensitive activities, including new or intensified sensitive activities, and incompatible activities near infrastructure; (ii) design standards to manage the effects of infrastructure on other activities; (iii) special purpose zoning and other spatial-planning layers; and (d) ensure that measures to avoid, remedy or mitigate the effects of other activities on infrastructure are consistent with relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies.	pump stations to protect nearby noise-sensitive activities, with noise measured and assessed in accordance with NZS 6801:2008 and NZS 6802:2008. Infrastructure has otherwise been incorporated into the masterplan and landscape framework so that potential amenity effects can be appropriately managed while retaining suitable access for operation and maintenance. As set out in the Infrastructure Report (refer to Appendix 13) has been developed through engagement with the relevant infrastructure providers, including Hamilton City Council and IAWAI, and provides for integration with existing and future infrastructure networks. The coordinated approach also enables compatible infrastructure to be located within shared road and infrastructure corridors where appropriate, while recognising that some infrastructure, such as stormwater devices, has specific locational and operational requirements. The Stormwater Management Plan (refer to Appendix 14) expressly provides for future maintenance and accessibility, including maintenance tracks, while retaining existing flow paths and accounting for upstream catchments and downstream infrastructure. Overall, the Brymer masterplan provides a coordinated framework for integrating infrastructure with residential and other land uses, while protecting the ongoing operation, maintenance and future development of infrastructure networks. The proposal is therefore considered consistent with the intent of Policy 10 of the NPS-I.
Policy 11: Assessing and managing the interface between infrastructure and other activities	The proposed Brymer development is consistent with Policy 11 in relation to noise and vibration. Consistent with Policy 11(1)(a), the Assessment of Noise Effects (refer to Appendix 27) recognises that construction noise and vibration will be typical for

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(1) When assessing and managing the interface between existing and planned infrastructure with other activities, including new or intensified sensitive activities, through planning instruments, decision-makers must: (a) recognise that noise, vibration, dust and visual effects are all typical effects associated with infrastructure activities that can be managed where practicable but not completely avoided; (b) recognise that: (i) amenity values change due to a range of factors; (ii) changes in amenity values from infrastructure activities can be necessary to achieve well-functioning urban and rural environments; and (c) apply the general principle that the primary responsibility for managing adverse effects is on the new activity (including infrastructure) while allowing flexibility for site- and project-specific circumstances.	a project of this scale and nature, particularly from earthworks, compaction, road construction, heavy vehicle movements and infrastructure installation. While these effects cannot be completely avoided, the assessment concludes that compliance with the relevant construction noise and vibration standards can be achieved through practicable mitigation. The Construction Noise and Vibration Management Plan (CNVMP) gives effect to this approach by requiring the best practicable option to minimise effects, including restricted construction hours, separation distances, quieter plant and methodologies, acoustic barriers, specific controls within 40 m of occupied dwellings, vibration mitigation, monitoring and corrective action. Consistent with Policy 11(1)(b) and (c), the proposal recognises that construction will result in a temporary change in acoustic amenity for some neighbouring properties, but that this is an inherent consequence of undertaking the infrastructure and enabling works necessary to establish the development. The effects will be temporary and managed so they remain reasonable, with the assessment of noise effects concluding that vibration is unlikely to unreasonably disrupt residential activities and construction noise and vibration can be managed to comply with the applicable standards. Importantly, as the new activity, the development assumes primary responsibility for managing these effects through the CNVMP and proposed consent conditions, including site-specific mitigation for the closest receivers. Accordingly, the proposal appropriately manages the interface between the proposed infrastructure and surrounding sensitive activities in a manner consistent with Policy 11. In addition to the noise and vibration matters addressed above, the Brymer development is considered consistent with Policy 11 in relation to dust, visual effects and changes in amenity associated with infrastructure activities.

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	Construction of the proposed infrastructure will involve earthworks, site formation, road construction and installation of three-waters infrastructure, which may generate temporary dust effects. These are recognised as typical construction effects and will be managed through standard construction practices, including the use of water carts for dust suppression and moisture conditioning during earthworks. It is proposed that these effects will be appropriately managed through the construction management framework and proposed consent conditions. The proposal will also result in a change to the existing visual and amenity character of the Site as it transitions from a rural environment to an urban neighbourhood. The LVA (refer to Appendix 12) recognises that infrastructure, including roads, earthworks and retaining, forms part of that change. However, the infrastructure has been comprehensively integrated with the masterplan, including the blue-green and open space network, landscaping and planting framework. As planting establishes, it will increasingly soften views of buildings, retaining and infrastructure and provide greater visual separation from adjoining properties. Consistent with Policy 11(1)(b), the resulting change in amenity needs to be considered in the context of the infrastructure being necessary to establish and support a well-functioning urban environment. Brymer directly adjoins Hamilton's western urban edge, and development in this location extends the existing urban form and enables use of existing transport, education, retail and community infrastructure. The transport and three-waters infrastructure is therefore an integral component of enabling the planned residential and commercial development and cannot be delivered without some change to existing amenity values. Overall, while dust, visual and amenity effects cannot be entirely avoided, they have been recognised through the Project design and technical assessments and will be managed through embedded design measures, landscaping, construction

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	management and proposed consent conditions. Consistent with Policy 11(1)(c), the Brymer development includes appropriate measures to manage these effects, with mitigation tailored to the nature and scale of the Project. Accordingly, when considered alongside the separate noise and vibration assessment above, the proposal is considered consistent with Policy 11 of the NPS-I.

Planning Attachment 7 – Objectives and Policies Assessment

Waikato Regional Policy Statement

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Part 2: Resource Management Overview	
<i>Integrated Management</i>	
Objective IM-O1 – Integrated Management Natural and physical resources are managed in a way that recognises: 1. the inter-relationships within and values of water body catchments, riparian areas and wetlands, the coastal environment, the Hauraki Gulf and the Waikato River; 2. natural processes that inherently occur without human management or interference; 3. the complex interactions between air, water, land and all living things; 4. the needs of current and future generations; 5. the relationships between environmental, social, economic and cultural wellbeing; 6. the need to work with agencies, landowners, resource users and communities; and 7. the interrelationship of natural resources with the built environment.	Brymer will achieve integrated management by: • Providing for an integrated water sensitive approach to stormwater management that recognises the inter-relationships within and values of water body catchments, riparian areas and wetlands and wider receiving waterbodies. • Providing for the housing needs of current and future generations through contributing to housing supply and choice by enabling retirement living. • Recognising the relationships between environmental, social, economic, and cultural wellbeing and the interrelationship of natural resources with the built environment through the proposed management and mitigation measures, including with respect to the following effects. Specific measures are further detailed in the Assessment of Environmental Effects Report. ○ Construction effects; ○ Design and layout effects; ○ Landscape and visual effects; ○ Transport effects; ○ Three Waters Infrastructure servicing effects; ○ Ecological effects;

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	○ Contaminated land effects; ○ Groundwater effects; ○ Effects on high class soils and rural production values; and ○ Reverse sensitivity effects.
Objective IM-O4 – Health and wellbeing of the Waikato River The health and wellbeing of the Waikato River is restored and protected and Te Ture Whaimana o Te Awa o Waikato (the Vision and Strategy for the Waikato River) is achieved.	While the Brymer Site is not located direction on or adjacent to the Waikato River, the site lies within the Waikato River Catchment and contributes to its health and wellbeing. The proposal is considered consistent with and supports the objectives of Te Ture Whaimana o Te Awa o Waikato for the following reasons: • Engagement has been undertaken with tangata whenua to ensure a holistic and integrated approach which allowed for iwi input into the design of the project; • The proposed riparian planting and stormwater treatment approaches will improve environmental outcomes for freshwater quality; • The project has the potential to strengthen environmental resilience and risk management from natural hazards, including flooding; • Appropriate management of risks and adverse effects will be implemented through a series of Management Plans during the project construction phase; and • The project avoids any direct discharge into sensitive freshwater environments and is designed to mitigate indirect cumulative impacts through staged development and infrastructure that aligns with river protection goals. Collectively, these actions enhance mauri and improve ecosystem functioning.

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Objective IM-O5 – Climate Change Land use is managed to: - avoid the potential adverse effects of climate change induced weather variability and sea level rise on: - amenity; - the built environment, including infrastructure; - indigenous biodiversity; - natural character; - public health and safety; and - public access. - support reductions in greenhouse gas emissions within urban environments and ensure urban environments are resilient to the current and future effects of climate change.	The Brymer development supports climate resilience through an integrated blue-green and stormwater network that manages flood risk and responds to future climate conditions. The SMP (refer to Appendix 14) incorporates climate-change adjusted rainfall and provides for attenuation and conveyance of events up to the 100 year storm, including climate change, with post-development peak discharges generally limited to no more than 80% of pre-development flows. The development also incorporates wetlands, riparian planting, green corridors and open space, which support ecological resilience and stormwater management. In addition, the compact urban form, neighbourhood centre, walking and cycling connections and provision for public transport support reduced reliance on private vehicles and therefore contribute to lower transport emissions. Overall, the proposal is considered consistent with Objective IM-O5.
Objective IM-O7 – Relationship of tangata whenua with the environment - The relationship of tangata whenua with the environment is recognised and provided for, including: - the use and enjoyment of natural and physical resources in accordance with tikanga Māori, including mātauranga Māori; and - the role of tangata whenua as kaitiaki.	The relationship of tangata whenua with the environment has been recognised and provided for through the development of the Brymer proposal, including through engagement with mana whenua (refer to Planning Attachment 2), preparation of a CIA by Ngāti Māhanga (Appendix 24), and a design and management framework that responds to identified tangata whenua values. The CIA confirms that the Site is within the rohe of Ngāti Māhanga and forms part of a wider cultural landscape connected with the upper Ohote Stream and Waikato River catchment. Despite historical modification, the Site retains cultural significance through its connections with whenua, wai, wetlands, groundwater systems and taonga species, and Ngāti Māhanga continue to exercise kaitiakitanga in relation to these resources. The proposed development provides for kaitiakitanga, mātauranga Māori and cultural values through measures including: retention, restoration and enhancement of wetlands, riparian areas and ecological corridors, including the use of eco-sourced native species where

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	practicable, supporting the health and mauri of wai, whenua and associated taonga species; • integration of wetlands, watercourses, riparian planting, stormwater areas and open spaces within the wider blue-green network, recognising the interconnected relationship between wai, whenua and ecological values identified by Ngāti Māhanga; • ongoing involvement of Ngāti Māhanga at key detailed design stages, including opportunities to review relevant management plans and design documentation and participate in ecological restoration, monitoring and enhancement activities; • opportunities for mātauranga Māori and cultural narratives to inform the future landscape and identity of Brymer, including cultural input into the naming of wetlands, reserves and streetscapes and incorporation of interpretive elements where appropriate; and • cultural monitoring during specified ground-disturbance activities, together with Accidental Discovery, Kooiwi Tangata Discovery and Taonga Tuuturu protocols, recognising the Site's location within the wider ancestral landscape of Ngāti Māhanga. The CIA records that Ngāti Māhanga are neutral to the proposal, contingent on the identified mitigation measures and cultural requirements being incorporated into the approval conditions, including ongoing engagement throughout design, construction, monitoring and operation. Subject to these measures being secured through the consent framework, the proposal recognises the cultural relationship of tangata whenua with the Site and its natural resources and provides an ongoing role

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	for Ngāti Māhanga in the exercise of kaitiakitanga. Accordingly, the proposal is considered consistent with Objective IM-O7.
Objective IM-O8 – Sustainable and efficient use of resources Use and development of natural and physical resources, excluding minerals, occurs in a way and at a rate that is sustainable, and where the use and development of all natural and physical resources is efficient and minimises the generation of waste.	The Brymer Development will contribute to the sustainable and efficient use of natural and physical resources. In particular, the development will make efficient use of the land resource to provide approximately 1,043 residential units and associated commercial activities, supported by a coordinated and staged infrastructure strategy. The Infrastructure Report (refer to Appendix 13) confirms that the water supply and wastewater infrastructure will integrate with the existing IAWAI reticulated networks, while the stormwater strategy incorporates on-lot retention and soakage, treatment, attenuation and controlled discharge to appropriately manage water quantity and quality effects. The staged delivery of infrastructure alongside development will also ensure servicing is provided efficiently as it is required. Overall, the proposal represents an efficient use of land and infrastructure resources while contributing to housing supply and choice.
Objective IM-O9 – Amenity 1. The qualities and characteristics of areas and features, valued for their contribution to amenity, are maintained or enhanced; and 2. Where intensification occurs in urban environments, built development results in attractive, healthy, safe and high-quality urban form which responds positively to local context whilst recognising that amenity values change over time in response to the changing needs of people, communities and future generations, and such changes are not, of themselves, an adverse effect.	Brymer aligns with Objective IM-O9 by delivering a comprehensively planned, high-quality urban environment that responds positively to the Site and its surrounding context. The masterplan has been shaped by the Site’s topography, wetlands and drainage network, adjoining established residential neighbourhoods, Te Kootii Park and rural interfaces, with the location and intensity of development tailored accordingly. The proposed landscape and open space strategy incorporates retained wetlands, watercourses, stormwater areas, ecological restoration and associated planting into an integrated blue-green network, which will contribute to landscape amenity, recreation and neighbourhood walkability. Lower scale development, increased separation and planting are proposed at established residential interfaces, while

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	setbacks and landscape treatment at rural interfaces will provide visual softening and an appropriate transition to adjoining land. The proposal will also establish an attractive, healthy and safe urban environment through a range of housing typologies and densities, connected streets and walking and cycling routes, and development that provides positive frontage and passive surveillance of streets and open spaces. The Residential Core Controls and Design Guidelines will further secure the quality of built form, landscaping, streetscape relationships and on-site amenity as development is delivered. While development will necessarily change the existing rural/peri-urban character and amenity of the Site, this is consistent with the Objective's recognition that amenity values change over time as urban environments respond to the changing needs of people and communities. Overall, Brymer will maintain and enhance relevant amenity qualities where practicable while establishing a high-quality urban form that responds positively to its local context, and is therefore consistent with Objective IM-O9. Refer to the UDA at Appendix 10 and LVA at Appendix 12 for more detail.
Policy IM-P3 – Tangata Whenua Tangata whenua are provided appropriate opportunities to express, maintain and enhance the relationship with their rohe through resource management and other local authority processes.	As outlined above at Objective IM-O7. The proposal is considered consistent with Policy IM-P3, as tangata whenua have been provided meaningful opportunities to express, maintain and enhance their relationship with their rohe through the development and consenting process. Ngāti Māhanga hold mana whenua over the Brymer development area, and their involvement reflects an enduring relationship and responsibility for whenua, wai and taonga within the Site and wider Waikato River catchment. Engagement with mana whenua has informed the proposal, including through the independent CIA prepared by Ngāti Māhanga (Appendix 24).

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	The CIA identifies cultural effects and sets out mitigation requirements and mechanisms for ongoing involvement in the Project. Importantly, opportunities for tangata whenua involvement extend beyond the consenting process and include: • ongoing engagement with Ngāti Māhanga through detailed design, construction, monitoring and operation of the development; • opportunities to review and comment on relevant management plans and design documentation; • cultural input into the naming of wetlands, reserves and streetscapes, and incorporation of interpretive elements where appropriate; • participation in ecological restoration, monitoring and enhancement activities, including provision of monitoring results to Ngāti Māhanga; and • cultural monitoring during identified ground-disturbance activities, supported by Accidental Discovery, Kooiwi Tangata Discovery and Taonga Tuuturu protocols. The CIA specifically seeks a long-term working relationship between Ngāti Māhanga Brymer Farms Limited and relevant authorities throughout the life of the Project, recognising that the exercise of kaitiakitanga continues beyond the granting of consent. Accordingly, the proposal provides practical and ongoing opportunities for tangata whenua to express and maintain their relationship with the Brymer Site and wider rohe through the resource management process, consistent with Policy IM-P3.
Policy IM-P5 – Maintain and enhance areas of amenity value	As outlined above. The proposal is considered consistent with Policy IM-P5, as the areas and features contributing to amenity value have been identified through the

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Areas of amenity value are identified, and those values are maintained and enhanced. These may include: 1. areas within the coastal environment and along inland water bodies; 2. scenic, scientific, recreational or historic areas; 3. areas of spiritual or cultural significance; 4. other landscapes or seascapes or natural features; and 5. areas adjacent to outstanding natural landscapes and features that are visible from a road or other public place.	LVA (refer to Appendix 12) and CIA (refer to Appendix 24), with the UDA (refer to Appendix 10) demonstrating how these values have informed the masterplan and urban design response. The LVA identifies relevant values associated with the Site's landform, pastoral openness, wetlands, watercourses, mature vegetation, rural-edge character and relationship with Hamilton's existing urban boundary. While Brymer will result in a substantial change from a rural edge landscape to an urban neighbourhood, the proposal incorporates measures to retain, enhance and integrate key amenity features within the future development. In particular, the proposal responds to identified amenity values through: • retention and enhancement of wetlands and integration of watercourses, stormwater areas, riparian and buffer planting into a connected blue-green network, strengthening natural character, ecological connectivity and the presence of water within the future neighbourhood; • provision of two public parks, two recreation reserves and 14 stormwater reserves, together with connections to existing recreational areas such as Te Kootii Park and the wider open-space network. The UDA (refer to Appendix 10) confirms that the open space and blue-green networks are integrated with the urban structure and will support recreation, connectivity and amenity within the future neighbourhood; • landscape and boundary planting, street trees and wetland and riparian planting that will progressively soften built edges, increase visual depth and reduce the prominence of development in views from adjoining residential areas, reserves and surrounding roads; and • recognition of the Site's cultural landscape values, including its relationship with whenua, wai and the wider Ngāti Māhanga cultural landscape. The CIA

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	recognises that cultural significance extends beyond individual recorded sites and includes the interconnected relationship between groundwater, wetlands, whenua and taonga species. The LVA confirms that the Site is not identified as an Outstanding Natural Landscape or Outstanding Natural Feature, although it retains local landscape and amenity values that require appropriate management. Accordingly, while existing amenity values will change through urbanisation, the LVA, CIA and UDA demonstrate that these values have been identified and appropriately responded to through the masterplan. The resulting landscape, open-space and blue-green framework will maintain and enhance important existing features while also creating new amenity values for the future community. The proposal is therefore considered consistent with Policy IM-P5.

Part 3: Domains and Topics

Land and freshwater

Objective LF-O1 – Mauri and values of fresh water bodies Maintain or enhance the mauri and identified values of fresh water bodies including by: 1. maintaining or enhancing the overall quality of freshwater within the region; 2. safeguarding ecosystem processes and indigenous species habitats; 3. safeguarding the outstanding values of identified outstanding freshwater bodies and the significant values of wetlands; 4. safeguarding and improving the life supporting capacity of freshwater bodies where they have been degraded as a result of human activities, with demonstrable progress made by 2030; 5. establishing objectives, limits and targets, for freshwater bodies that will determine how they will be managed;	The Brymer proposal has been designed to manage land use, stormwater, groundwater, wetlands and watercourses in an integrated way, while providing for restoration and enhancement of freshwater values. The Site forms part of the upper Ohote Stream catchment, which ultimately connects to the Waikato River, and the freshwater response has therefore been developed having regard to both site-specific and wider catchment effects. In particular: • Improve water quality, including for the Waikato River; • Maintaining or enhancing freshwater quality - Stormwater will be managed through an integrated treatment train incorporating retention and soakage, treatment, extended detention, artificial wetlands and controlled discharge. The SMP (refer to Appendix 14) has been developed in accordance with
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Objective / Policy	Comment
6. enabling people to provide for their social, economic and cultural wellbeing and for their health and safety; 7. recognising that there will be variable management responses required for different catchments of the region; and 8. recognising the interrelationship between land use, water quality and water quantity.	Waikato Regional Council guidance and includes measures to treat runoff before it enters the receiving environment; • Safeguarding ecosystem processes and indigenous species habitats - The proposal includes restoration and native planting of wetlands and riparian margins, improved fish passage, pest management and creation of additional aquatic habitat. Approximately 26.7 ha of restorative planting is proposed, with the EclA (refer to Appendix 23) identifying net positive ecological outcomes from this planting and enhancement; • Safeguarding wetland values - Existing natural wetlands have been identified and assessed through the EclA. While approximately 0.51 ha of modified natural wetland will be lost, compensation includes restoration and creation of wetland habitat, with the EclA identifying an anticipated 13.2% net gain in wetland extent/value following compensation. Changes in recharge to retained wetlands are also mitigated by redirecting treated stormwater to their upper reaches; • Improving degraded freshwater systems - Existing wetlands and watercourses are generally highly modified by historic agricultural drainage and land use. The proposal will restore streams through native and buffer planting, weed and pest control, create approximately 144 m of new ephemeral watercourse, and improve fish passage through replacement of existing culverts. These measures will progressively improve ecological function and life-supporting capacity; • Objectives, limits and targets - The proposal does not itself establish regional freshwater objectives, limits or targets, which is primarily a regional planning function. However, its design responds to the applicable regional framework and incorporates measurable design criteria, including water-quality

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	treatment, extended detention, on-site retention and attenuation of peak flows; • Social, economic and cultural wellbeing and health and safety - The freshwater response is integrated with a comprehensively planned urban development providing approximately 1,043 homes, commercial activities, open space and supporting infrastructure. The proposal therefore enables community wellbeing while managing freshwater effects, and the CIA (refer to Appendix 24) also recognises the importance of restoring and protecting the health and mauri of connected wetlands, groundwater and waterways; • Variable catchment management responses - The stormwater and freshwater response has been tailored to the characteristics of the upper Ohote Stream catchment, including its low-lying peat soils, shallow groundwater, modified drainage network, wetlands and downstream connections. This recognises that an appropriate response must reflect the particular hydrological and ecological characteristics of the catchment; and • Interrelationship between land use, water quality and water quantity - This relationship has been a key consideration in the Brymer project design. The groundwater assessment identifies that urbanisation may reduce infiltration and groundwater recharge, and the stormwater network has therefore been redesigned to redirect treated stormwater to retained wetlands and streams where reductions in recharge and baseflows would otherwise occur. The stormwater system also manages both runoff quality and quantity to minimise downstream effects. Overall, while the Project will modify some existing freshwater features, the proposed restoration, wetland compensation, riparian planting, fish-passage improvements and integrated stormwater and groundwater response will maintain

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	and, in a number of respects, enhance freshwater values and ecological function. The proposal is therefore considered consistent with Objective LF-O1 of the Waikato RPS.
Policy LF-P2 – Outstanding fresh water bodies and significant values of wetlands Ensure that the outstanding values of a fresh water body that result in that water body being identified as an outstanding fresh water body, and the significant values of wetlands, are protected and where appropriate enhanced.	As confirmed through the EclA (refer to Appendix 23), no outstanding freshwater body has been identified within the Brymer Site. The freshwater environment instead comprises natural inland wetlands, modified perennial and ephemeral watercourses and artificial drains within the upper Ohote Stream catchment, with the modified watercourses generally assessed as having very low ecological function and value. The policy is nevertheless relevant in relation to the significant values of wetlands. The Ecological Impact Assessment identifies and delineates the natural inland wetlands on the Site and assesses the effects of the proposed development on those features. While some modified wetland habitat will be lost, the proposal includes restoration and enhancement of retained wetlands, creation of additional wetland habitat, extensive native planting and long-term protection measures. The EclA concludes that these measures are expected to result in a net positive wetland outcome, including an anticipated 13.2% net gain following compensation. The freshwater design also seeks to protect wetland hydrology. Where development would reduce groundwater recharge and baseflows, the stormwater network has been designed to redirect treated stormwater to the upper reaches of retained wetlands. In addition, the stormwater system incorporates treatment, attenuation, retention and riparian planting measures to manage water quality and quantity effects and support ecological enhancement. Accordingly, while there are no identified outstanding freshwater bodies within the Site, the proposal recognises, protects and where appropriate enhances the values

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	of the Site's wetlands, and is considered consistent with Policy LF-P2 of the Waikato RPS.
Objective LF-O2 – Allocation and use of fresh water The allocation and use of fresh water is managed to achieve freshwater objectives (derived from identified values) by: 1. avoiding any new over-allocation of ground and surface waters; 2. seeking to phase out any existing over-allocation of ground and surface water bodies by 31 December 2030; 3. increasing efficiency in the allocation and use of water; and 4. recognising the social, economic and cultural benefits of water takes and uses.	The Brymer development is considered consistent with Objective LF-O2, as the water required to service the development has been specifically assessed and an appropriate allocation has already been authorised by Waikato Regional Council (refer to Appendix 31). A resource consent has been granted to take up to 1,323 m³/day (15.3 L/s) from the Waikato River via Hamilton City Council's existing intake structures for residential and commercial use at Brymer. In granting the consent, Waikato Regional Council assessed the effects on flow regimes and aquatic ecology and concluded that the environmental effects of the take would be less than minor and consistent with the relevant regional policy and planning framework. The Infrastructure Report (refer to Appendix 13) also demonstrates that water demand and servicing have been specifically considered, including modelling undertaken for HCC/IAWAI to assess the effects of Brymer and other fast-track developments on the wider water supply network. The preferred servicing approach utilises the existing public water supply network, together with new bulk mains and a reservoir to efficiently service the development. Accordingly, the proposal does not rely on an unassessed future freshwater allocation. The authorised take provides for the social and economic benefits associated with approximately 1,043 new dwellings and supporting commercial activities, while the consent process has confirmed that the take can occur without unacceptable effects on the freshwater resource. The proposal is therefore considered consistent with Objective LF-O2.

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Objective LF-O3 – Riparian areas and wetlands Riparian areas (including coastal dunes) and wetlands are managed to: 1. maintain and enhance: (a) public access; and (b) amenity values. 2. maintain or enhance: (a) water quality; (b) indigenous biodiversity; (c) natural hazard risk reduction; (d) cultural values; (e) riparian habitat quality and extent; and (f) wetland quality and extent.	The Brymer proposal integrates the Site's existing wetlands and riparian areas within a wider blue-green and open space network and provides for their restoration and enhancement alongside the proposed urban development. In particular: • The masterplan (refer to Appendix 6) integrates wetlands, watercourses and associated planting with the public open space and pedestrian network, providing opportunities for residents to experience these features as part of the future neighbourhood. The LVA (refer to Appendix 12) identifies public footpaths and pedestrian accessways alongside the blue-green network as providing opportunities for stronger connections with water, vegetation and shared spaces. • The stormwater system adopts an integrated treatment train incorporating on-lot retention, forebays and constructed wetlands. The wetlands provide water-quality treatment, extended detention and attenuation before controlled discharge to the receiving environment. • Retained wetlands and streams will be restored through retirement from grazing, livestock exclusion, pest control and dense indigenous planting. The EclA (refer to Appendix 23) anticipates that these measures will increase native plant diversity and abundance, improve indigenous fauna values and strengthen ecological connectivity between wetlands, streams and other habitats. • Wetlands and associated stormwater infrastructure provide attenuation and flood storage, while retained drainage corridors and diversion channels maintain conveyance of external flows through the Site and reduce flood risk within the development.

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	• The blue-green network provides opportunities to recognise the relationship between whenua and wai and to support expressions of kaitiakitanga through the restoration and ongoing care of wetlands, waterways and associated vegetation. • While some highly modified wetland and watercourse habitat will be affected, the proposal includes wetland creation and restoration of retained wetlands and streams. The EclA anticipates an improvement in ecological value through native planting, livestock exclusion, pest management and improved buffering, with the restored wetlands expected to increase from moderate to high ecological value over time. Overall, the proposal provides an integrated approach to the management of riparian areas and wetlands that will enhance ecological and amenity values, improve water quality, contribute to flood management and strengthen the quality and connectivity of freshwater habitats. It is therefore considered consistent with Objective LF-03.
Objective LF-04 – Values of soil The soil resource is managed to safeguard its life supporting capacity, for the existing and foreseeable range of uses.	The proposal is considered consistent with Objectives LF-04 and LF-05, as the soil resource and its productive capability have been specifically investigated and the value of high class soils has been recognised in the design and assessment of the development. A detailed, site-specific Soil and Land Use Capability Assessment (refer to Appendix 29) has been undertaken for the approximately 81 ha Site. This confirms that the soil resource is highly variable and subject to significant physical limitations, including poor and very poor drainage, seasonal and prolonged wetness, high groundwater levels, peat soils, rolling to steep topography and erosion susceptibility. Approximately 48% of the Site is affected by wetness limitations, which materially restrict the range and intensity of long-term productive uses.
Objective LF-05 – High class soils The value of high class soils for primary production is recognised and high class soils are protected from inappropriate subdivision, use or development.	

Objective / Policy	Comment
	Importantly, the detailed assessment identifies only approximately 2.5 ha, or 3.2% of the Site, as high class soil under the Waikato District Plan definition, comprising approximately 2.1 ha of LUC 2w3 and 0.4 ha of LUC 3e1. The remaining 96.8% of the Site is not high class soil. The identified high class soils occur as small, discrete areas within or adjoining more constrained LUC units and are not part of a large or geographically cohesive high class soil resource; the Soil and LUC Assessment concludes that they are not of sufficient scale to be practically managed separately from the surrounding land. More broadly, the productive land assessment concludes that the Site's physical constraints, fragmentation and urban-edge location substantially reduce its long-term productive capacity. Accordingly, while the proposal will result in the conversion of a limited area of high class soil to urban use, the value and capability of the soil resource has been expressly recognised and assessed, and the affected high class soils are limited, fragmented and constrained in their practical productive potential. In this context, the development is not considered to represent an inappropriate loss of high class soils and is consistent with the intent of Objectives LF-O4 and LF-O5.
Policy LF-P2 – Outstanding fresh water bodies and significant values of wetlands Ensure that the outstanding values of a fresh water body that result in that water body being identified as an outstanding fresh water body, and the significant values of wetlands, are protected and where appropriate enhanced.	No outstanding freshwater body has been identified within the Brymer Site. The policy is, however, relevant to the natural inland wetlands identified across the Site, which the EclA (refer to Appendix 23) generally assesses as having moderate ecological value, reflecting their habitat type despite their currently modified and degraded condition. The proposal has been designed to protect and enhance wetland values as part of an integrated ecological and stormwater response. While some modified wetland habitat will be lost, the proposal includes the creation of approximately 0.75 ha of new wetland habitat, together with restoration of approximately 1.197 ha of existing wetlands. Restoration will include replacement of exotic vegetation with

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	indigenous species, increased native plant diversity, pest control and improved buffering through surrounding planting, with the EclA anticipating that restored wetlands will increase from moderate to high ecological value over time. The stormwater strategy also supports the protection of freshwater values through treatment, attenuation and flood management. In particular, the proposed wetlands will treat stormwater before discharge to the receiving environment, while the wider system maintains hydraulic connectivity and manages runoff and external catchment flows through the Site. Overall, while no outstanding freshwater bodies are affected, the proposal appropriately protects and enhances the significant values of the Site's wetlands through wetland creation, restoration, indigenous planting and integrated stormwater management. The proposal is therefore considered consistent with Policy LF-P2.
Policy LF-P3 – All fresh water bodies Manage the effects of activities to maintain or enhance the identified values of fresh water bodies and coastal water including by: 1. reducing: (a) sediment in fresh water bodies and coastal water (including bank instability) that is derived from human based activities; (b) accelerated sedimentation of estuaries; (c) microbial and nutrient contamination; (d) other identified contaminants; and 2. Where appropriate, protection and enhancement of: (a) riparian and wetland habitat; (b) instream habitat diversity; (c) indigenous biodiversity; and	The Brymer development is considered consistent with Policy LF-P3, as the effects of urban development on freshwater bodies have been specifically assessed and an integrated ecological, hydrological and stormwater response is proposed to maintain and, where practicable, enhance freshwater values. The project seeks to enhance freshwater bodies by, appropriately treating stormwater prior to discharge, improving water quality, increasing indigenous species population and undertaking habitat enhancement. In particular: • Construction related sediment will be managed through erosion and sediment controls designed in accordance with Waikato Regional Council guidance. The EclA (refer to Appendix 23) concludes that, with these measures, construction effects on water and habitat quality will be low. Operational stormwater will be managed through an integrated treatment train, including on-lot retention,

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(d) providing for migratory patterns of indigenous freshwater species up and down rivers and streams and to the coastal marine area where practicable; and 2. avoiding: (a) physical modification of fresh water bodies where practicable; and (b) inappropriate development in flood plains; and 3. managing: (a) groundwater and surface water flow/level regimes, including flow regime variability; (b) linkages between groundwater and surface water; and (c) pest and weed species where they contribute to fresh water body and coastal water degradation.	forebays and constructed wetlands, to manage sediment and other contaminants before discharge. - The proposal includes approximately 26.7 ha of restorative planting within riparian areas, wetlands and other ecological areas. Retained streams and wetlands will be enhanced through indigenous planting, retirement from grazing, livestock exclusion and pest management, improving habitat quality and ecological connectivity. - Existing modified watercourses have low ecological value and generally provide uniform habitat with little riparian vegetation. While some watercourse loss, culverting and modification is required, these effects are addressed through the effects management hierarchy, including stream restoration and creation. - The masterplan has sought to integrate existing waterways, wetlands, drainage corridors and overland flow paths into the development where practicable. The stormwater strategy retains hydraulic connectivity through the Site and provides attenuation, flood storage and controlled conveyance, including for existing upstream flows, to appropriately manage flood risk and avoid worsening downstream effects. - The relationship between groundwater, wetlands and streams has been specifically assessed. Where development would reduce recharge and potential baseflows to retained wetlands, the stormwater system has been redesigned to redirect treated stormwater into the upper reaches of the gully wetlands and streams. Groundwater effects associated with construction are assessed as localised and temporary, with monitoring and management measures proposed.

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	Ecological restoration will include pest and weed management, while biosecurity measures will be incorporated into construction management to minimise the introduction and spread of weeds, animal pests and pathogens. Overall, while some modification of already highly modified freshwater features is required, the proposal incorporates water-quality treatment, hydrological management, riparian and wetland restoration, habitat enhancement and appropriate flood management. Collectively, these measures will maintain and, in a number of respects, enhance freshwater values and are considered consistent with Policy LF-P3.
Policy LF-P6 – Allocating fresh water Manage the increasing demand and competition for water through the setting of allocation limits, efficient allocation within those limits, and other regional plan mechanisms which achieve identified freshwater objectives and: - maintain and enhance the mauri of fresh water bodies; - retain sufficient water in water bodies to safeguard their life-supporting capacity and avoid any further degradation of water quality; - enable the existing and reasonably justified foreseeable domestic or municipal needs of people and communities and an individual's reasonable animal drinking water requirements to be met (with discretion to consider additional allocations for those particular uses in fully and over-allocated catchments); - avoid any reduction in the generation of electricity from renewable electricity generation activities, including the Waikato Hydro Scheme; and - recognise that lawfully existing water takes (including those for regionally significant industry and primary production activities supporting that industry) contribute to social, economic and cultural wellbeing and that significant investment relies on the continuation of those takes.	The proposal will generate additional demand for water associated with the proposed residential development, and the Infrastructure Report (refer to Appendix 13) has considered alternative water supply options, including connection to Hamilton City Council's reticulated network and groundwater abstraction. Water supply modelling has also been undertaken to assess the effects of the development on the wider public network. In particular: - The hydrological assessment (refer to Appendix 20) concludes that the development is not expected to materially alter the overall groundwater flow regime or result in a measurable long-term change in the catchment water balance. Stormwater management measures will redistribute and maintain flows within the Site, including baseflows to drains and freshwater environments. - The Infrastructure Report (refer to Appendix 13) identifies the anticipated domestic water demand associated with the development and provides for this through a staged servicing strategy. The preferred centralised servicing

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	approach includes connections to the HCC network and a proposed reservoir, subject to the relevant network requirements. Groundwater abstraction has been investigated as an alternative servicing option and testing indicates that groundwater quantity and quality could support the development. Importantly, should groundwater abstraction be pursued, the Infrastructure Report recognises that the necessary water allocation consents would be required from Waikato Regional Council, ensuring any take is assessed and managed within the applicable allocation framework. The proposal does not affect renewable electricity generation or seek to alter existing lawful water takes. Overall, the development provides a framework for meeting its future water demands while ensuring that any groundwater abstraction is subject to the regional allocation regime and that freshwater and catchment values are appropriately maintained.
Policy LF-P7 – Efficient use of fresh water Ensure that the allocated water resource is used efficiently.	The proposed water requirements for Brymer have been quantified and assessed as part of the infrastructure design and water supply modelling. The Infrastructure Report (refer to Appendix 13) identifies an average daily water demand of approximately 8.83 L/s for the development, with the proposed water supply infrastructure designed around the identified demand. A water take of up to 1,323 m³/day (15.3 L/s) from the Waikato River via Hamilton City Council’s existing intake structures has been assessed by Waikato Regional Council for residential and commercial use at Brymer. The Council assessment concluded that the environmental effects of the take would be less than minor and that the activity would be consistent with the relevant regional policy and planning framework, subject to conditions.

Objective / Policy	Comment
	The wider water management approach also supports efficient use of water resources through on-site retention and soakage of stormwater, reducing runoff volumes and assisting groundwater recharge, consistent with the sustainability and efficiency hierarchy applied through the RITS. Overall, the proposal provides for water to be allocated and used in a planned and efficient manner to meet the needs of the development and is considered consistent with Policy LF-P7.
Policy LF-P8 – Maintain or enhance the life supporting capacity of the soil resource Manage the soil resource to: 1. minimise sedimentation and erosion; 2. maintain or enhance biological, chemical and physical soil properties; and 3. retain soil versatility to protect the existing and foreseeable range of uses of the soil resource.	The proposal is considered consistent with Policy LF-P8, as the soil resource has been specifically investigated and the proposed development incorporates measures to manage erosion, sedimentation and the physical condition of soils during earthworks. The Soil and LUC Assessment (refer to Appendix 29) identifies that soils across the Site have varying physical limitations, including poor drainage, seasonal wetness, high groundwater levels and erosion susceptibility on steeper slopes. The GIR (refer to Appendix 17) accordingly recommends that earthworks are undertaken under geotechnical oversight, with controlled placement and compaction of engineered fill, protection of natural subgrade soils from excessive remoulding and moisture ingress, and undercutting or appropriate reuse/removal of unsuitable material. These measures will assist in maintaining appropriate physical soil properties and ensuring the land remains suitable and stable for its intended future urban use. The proposed earthworks will also be undertaken in accordance with the Waikato Regional Council Erosion and Sediment Control Guidelines and will include preventative erosion and sediment control measures appropriate to the scale and nature of the works. This will include installation of sediment control devices prior to earthworks commencing, management of exposed earthwork areas and runoff, stabilisation of disturbed areas, and monitoring and maintenance of erosion and sediment controls throughout construction. The GEMP also provides for an Erosion and Sediment Control Plan as part of the construction management framework.

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	These measures will minimise sedimentation and erosion during the earthworks and construction stage. While the proposal will change the existing use and therefore the productive versatility of the soil resource, the detailed Soil and LUC Assessment confirms that much of the Site is already constrained by wetness, drainage and erosion limitations, which restrict its range of productive uses. Overall, the proposal appropriately manages the soil resource for its foreseeable urban use through recognised earthworks, erosion and sediment control and geotechnical management measures and is therefore considered consistent with Policy LF-P8.
Policy LF-P9 – Soil contaminants Ensure that contaminants in soils are minimised and do not cause a reduction in the range of existing and foreseeable uses of the soil resource. Particular attention will be given to the potential for effects on: 1. human health; 2. animal health; 3. suitability of soil for food production; 4. micro-nutrient availability; 5. soil ecology; and 6. groundwater.	The proposal is considered consistent with Policy LF-P9, as potential soil contamination has been specifically investigated and will be remediated and managed so that it does not constrain the foreseeable residential use of the Site or result in unacceptable effects on human health, soil or groundwater. The DSI (refer to Appendix 21) confirms that contamination is localised, principally around the cottage and Stockyards 1–3, and comprises elevated lead, isolated asbestos and localised arsenic associated with historic HAIL activities. Outside these discrete areas, soils are considered suitable to remain and be reused on Site. The DSI assessed contaminants against both human health and ecological criteria, including standards relevant to residential use and produce growing. Heavy metals identified within the stockyard areas were generally below the applicable NESCS Soil Contaminant Standards and ecological guideline values, while the identified areas exceeding relevant criteria have been clearly delineated for remediation. The accompanying RAP-CSMP (refer to Appendix 22) requires excavation and remediation of affected soils, validation sampling by a SQEP, appropriate on-site soil handling and reuse, licensed off-site disposal where necessary, and procedures for unexpected contamination. Remediation criteria adopt the NESCS residential 10%

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	produce scenario and relevant asbestos criteria, ensuring remaining soils are suitable for the proposed residential use. The RAP-CSMP also includes controls to prevent contaminants being mobilised to surrounding soils or groundwater, including management of exposed soils and stockpiles, erosion and sediment controls, dust management and SQEP oversight where groundwater is encountered. Accordingly, the identified contamination will be remediated and managed so that risks to human health, soil ecology, groundwater and the future use of the soil resource, including residential produce growing where relevant, are appropriately controlled. The proposal is therefore considered consistent with Policy LF-P9.
LF-P11 – High Class Soils Avoid a decline in the availability of high class soils for primary production due to inappropriate subdivision, use or development.	The proposal is considered consistent with Policy LF-P11. A detailed, property-scale Soil and Land Use Capability (LUC) classification assessment has been undertaken by Landsystems (refer to Appendix 29) for the approximately 81 ha Brymer Site to establish the actual extent of high class soils and the Site's productive limitations. The assessment notes that regional-scale LUC mapping is not sufficiently detailed to definitively characterise soils at an individual property scale, and that the on-site assessment provides the most accurate and fit-for-purpose information for assessing soil resources, LUC and land productivity. The detailed assessment identifies only 2.5 ha (3.2%) of the Site as high class soil under the Waikato District Plan – Operative in Part definition, comprising approximately 2.1 ha of LUC 2w3 land and 0.4 ha of LUC 3e1 land. The remaining 78.4 ha (96.8%) is not high class soil, including substantial areas affected by wetness, drainage, slope and erosion limitations, together with approximately 12.5 ha of non-productive land. The assessment also records that the Site includes extensive poorly or very poorly drained soils, land prone to high groundwater levels and ponding, steeper land with erosion limitations, and existing non-productive areas comprising

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	buildings and curtilage, drains, wetlands and seeps, ponds, tracks, native vegetation and previously earthworked areas. Accordingly, while the proposed urban development will result in the loss of a very small and discrete area of high class soil, the overwhelming majority of the Site does not comprise high class soils and has physical constraints that limit its productive versatility. In this context, development of the Site will not result in a material decline in the availability of high class soils for primary production. The proposal is therefore considered consistent with the intent of Policy LF-P11.
Ecosystems & Indigenous Biodiversity	
Objective ECO-O1 – Ecological integrity and indigenous biodiversity The full range of ecosystem types, their extent and the indigenous biodiversity that those ecosystems can support exist in a healthy and functional state.	The Brymer EclA (refer to Appendix 23) identifies that the Site is highly modified by its historic agricultural use, with approximately 68 ha of pasture and cropping land within the earthworks footprint assessed as having negligible botanical ecological value. Notwithstanding this existing condition, the proposal has been designed to protect, restore and enhance the more important ecological features within the Site and increase the extent and quality of indigenous habitat. Specifically: • The existing 1.52 ha kānuka treeland will be retained and protected, while approximately 1.2 ha of natural wetlands, together with associated riparian areas, wetland buffers and hillsides, will be restored through indigenous planting and pest plant and animal control. • Approximately 26.7 ha of the Site, excluding house lot and streetscape planting, will be planted, including native planting associated with wetlands, streams and stormwater treatment areas. This is expected to provide an overall positive ecological outcome and improve habitat extent and connectivity. • Residual effects on wetlands will be addressed through wetland creation and restoration. The ecological assessment predicts a 13.2% net positive outcome

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	for wetland habitat, with created and restored wetlands to be planted, subject to pest management and legally protected in perpetuity. - Stream restoration will include retirement from grazing, indigenous planting and pest control, improving habitat quality and connectivity with wetlands and other waterways and supporting species dispersal. - Potential effects on indigenous fauna, including native birds, lizards and long-tailed bats, are addressed through specific management measures, while the substantial indigenous planting proposed is expected to provide improved habitat over the medium to long term. Overall, while the proposal will modify an existing predominantly pastoral environment, the protection of existing ecological features together with substantial indigenous planting, wetland creation and restoration, stream enhancement and fauna management will improve the extent, connectivity and ecological function of indigenous habitats across the Site. The proposal is therefore considered to support the ecological integrity and indigenous biodiversity outcomes sought by Objective ECO-O1.
Policy ECO-P1 – Maintain or enhance indigenous biodiversity Promote positive indigenous biodiversity outcomes to maintain the full range of ecosystem types and maintain or enhance their spatial extent as necessary to achieve healthy ecological functioning of ecosystems, with a particular focus on: - working towards achieving no net loss of indigenous biodiversity at a regional scale; - the continued functioning of ecological processes; - the re-creation and restoration of habitats and connectivity between habitats;	The Brymer development is consistent with Policy ECO-P1. The Site is predominantly a highly modified pastoral environment; however, the proposal provides a significant opportunity to protect existing ecological features and restore and reconnect indigenous habitats across the Site. The EclA (refer to Appendix 23) anticipates net positive ecological outcomes through the proposed restoration, enhancement and effects management package. In particular: No net loss: The proposal is expected to achieve an overall net positive outcome for indigenous biodiversity. Approximately 26.7 ha of the Site will be

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4. supporting (buffering and/or linking) ecosystems, habitats and areas identified as significant indigenous vegetation and significant habitats of indigenous fauna; 5. providing ecosystem services; 6. the health and wellbeing of the Waikato River and its catchment; 7. contribution to natural character and amenity values; 8. tangata whenua relationships with indigenous biodiversity including their holistic view of ecosystems and the environment; 9. managing the density, range and viability of indigenous flora and fauna; and 10. the consideration and application of biodiversity offsets.	subject to ecological and landscape planting, including natural wetlands, riparian and wetland buffers, hillsides and stormwater reserves. The existing 1.52 ha kānuka treeland will also be retained, protected and enhanced. • Ecological processes: Retaining and restoring wetlands and streams, indigenous planting, livestock exclusion and pest control will improve ecological function and support species dispersal. Restored wetlands are expected to increase from moderate to high ecological value and form stronger connections with the stream network, kānuka treeland and created wetland habitat. • Habitat restoration and connectivity: The proposal includes creation of 0.75 ha of wetland habitat, restoration of approximately 1.197 ha of existing wetlands, stream creation and restoration, and additional indigenous riparian planting. These measures will increase habitat extent and strengthen connections between freshwater and terrestrial habitats. • Supporting habitats and ecosystem services: The extensive indigenous planting and restoration will provide greater buffering around wetlands and waterways and improve habitat quality, while also supporting ecosystem services such as water-quality improvement, bank stability and stormwater management. • Waikato River and its catchment: The Site is within the upper Ohote Stream catchment, which ultimately connects to the Waikato River. The proposed restoration of wetlands, streams and riparian areas provides an opportunity to improve currently degraded ecological values within this part of the catchment. The CIA (refer to Appendix 24) similarly identifies the need for development within the catchment to advance restoration objectives rather than contribute to incremental degradation.

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	• Natural character and amenity: Replacing areas of predominantly pastoral and exotic vegetation with extensive indigenous planting, restored wetlands and enhanced waterways will increase the natural character and ecological amenity of the Site. • Tangata whenua relationships: The proposal recognises the relationship of Ngāti Māhanga with wai, whenua and taonga species. The CIA identifies wetland function, ecological connectivity and the long-term viability of taonga species habitat as important cultural considerations and seeks ongoing involvement of Ngāti Māhanga through design, construction, monitoring and operation. • Indigenous flora and fauna: Potential effects on indigenous birds, lizards and long-tailed bats will be managed through species-specific measures, including nesting precautions, lizard salvage and relocation, Bat Roost Protocols and habitat replacement and enhancement. The EcIA anticipates net positive habitat outcomes over the medium to long term. • Biodiversity offsets: The residual loss of modified wetland and stream habitat has been expressly addressed through the effects management hierarchy and quantified using the Biodiversity Compensation Model. For wetlands, the proposed creation and restoration package is predicted to result in a 13.2% net positive outcome, exceeding the 10% net-gain target adopted in the assessment. Overall, the proposal provides for substantial protection, restoration, creation and reconnection of indigenous habitats, while appropriately managing residual effects through biodiversity offsetting. It is therefore considered to promote positive indigenous biodiversity outcomes consistent with Policy ECO-P1.

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Policy ECO-P2 – Protect significant indigenous vegetation and significant habitats of indigenous fauna Significant indigenous vegetation and the significant habitats of indigenous fauna shall be protected by ensuring the characteristics that contribute to its significance are not adversely affected to the extent that the significance of the vegetation or habitat is reduced.	The EclA (refer to Appendix 23) confirms that there are no mapped SNAs within the Site, and no terrestrial vegetation within the Site meets the WRPS significance criteria. This includes the approximately 1.52 ha kānuka treeland, which has been assessed as having low ecological value due to its modified condition, isolation, sparse understorey and exotic species component. The EclA does, however, identify the Site's natural wetlands as significant under the WRPS criteria, principally because wetlands are an under-represented habitat type within the Hamilton Ecological District, with less than 1% of their historical cover remaining. The wetlands are otherwise highly modified, predominantly exotic and assessed as having moderate ecological value. The proposal will retain and restore the majority of existing wetland habitat, while the residual loss of approximately 0.514 ha is addressed through the effects management hierarchy, including creation of 0.75 ha of new wetland and restoration of approximately 1.197 ha of existing wetlands. The restored wetlands are expected to increase from moderate to high ecological value and form stronger connections with the stream network and kānuka treeland. The Site is also used by indigenous fauna, including long-tailed bats, which were detected commuting through the Site. However, the EclA concludes that this use does not trigger the WRPS significance criteria, and similarly concludes that habitat within the Site is not important for the persistence of copper skink locally or nationally. Notwithstanding this, potential effects on indigenous fauna will be managed through specific bird, lizard, bat and fish management measures, including the BMP, FMP and LMP (refer to Appendix 23). Overall, while the Site does not contain significant terrestrial indigenous vegetation or significant terrestrial fauna habitat, the proposal appropriately recognises the significance of the natural wetlands and provides for their protection, restoration

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	and replacement. The proposed ecological management package is expected to result in an overall net positive ecological outcome, consistent with Policy ECO-P2.
Hazards & Risks	
Objective HAZ-O1 – Natural hazards The effects of natural hazards on people, property and the environment are managed by: 1. increasing community resilience to hazard risks; 2. reducing the risks from hazards to acceptable or tolerable levels; and 3. enabling the effective and efficient response and recovery from natural hazard events.	The proposal is consistent with Objective HAZ-O1 as the development has identified and assessed the natural hazards relevant to the Site and incorporates site-specific design, engineering and management measures to reduce those risks to acceptable or tolerable levels and improve the resilience of the future community. Flood risk has been specifically assessed through the Stormwater Management Plan and associated flood modelling. The Site is influenced by existing drainage channels, upstream catchments and flood prone low-lying areas, and the stormwater strategy has therefore been designed to manage both on-site and downstream flood effects. Existing overland flow paths have been identified and allowed for through the development up to the 100 year event, while flood mitigation strategies have been developed for the individual stormwater catchments. The flood assessment also incorporates climate change adjusted rainfall, including the 100-year climate change event. Stormwater will be managed through on-lot retention, artificial wetlands, attenuation, controlled discharge and designated overland flow paths, with post-development peak flows generally limited to no more than 80% of pre-development flows. These measures will reduce the potential for development to increase downstream flooding and provide safe pathways for larger storm events. Overall, the proposed stormwater and flood-management framework responds directly to the identified flood hazard, accommodates future climate conditions and reduces flood risk to people, property and the surrounding environment. It therefore supports increased community resilience and is considered consistent with Objective O1 of the Waikato RPS.

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	From a geotechnical perspective, geotechnical hazards affecting the Site have been identified and can be appropriately managed through design, construction and monitoring measures. The GIR (refer to Appendix 17) identifies key risks including liquefaction, compressible and expansive soils, settlement, slope instability and shallow groundwater, and recommends mitigation including preloading and consolidation of low-lying areas, engineered clay fill, appropriate foundation design, controlled slope gradients and further detailed stability assessment where required. The GIR also confirms that proposed slopes meet the requisite factors of safety, subject to detailed design of retaining structures and further assessment where necessary. These measures are reinforced by the Geotechnical Effects Management Plan (GEMP) (refer to Appendix 18), which provides for groundwater and settlement monitoring, geotechnical oversight and a Trigger Action Response Plan (TARP) to identify and respond to any unexpected effects during construction. Monitoring of groundwater levels and ground settlement is proposed before, during and after relevant works, with contingency measures available where trigger levels are exceeded. Collectively, this framework will reduce geotechnical risks to acceptable or tolerable levels, improve the resilience of future buildings and infrastructure, and enable timely response and remediation if adverse effects arise. Accordingly, the Brymer development is considered consistent with Objective HAZ-O1. For the reasons outlined above, it is considered that the Brymer development effectively manages natural hazard risks in accordance with Objective HAZ-O1.
Policy HAZ-P1 – Natural hazard risk management approach Natural hazard risks are managed using an integrated and holistic approach that: 1. ensures the risk from natural hazards does not exceed an acceptable level; 2. protects health and safety;	The Brymer development has identified and assessed the natural hazards relevant to the Site and adopts an integrated, risk-based approach to ensure that those hazards are appropriately managed through the design, servicing and ongoing development of the Site, consistent with Policies 1, 2 and 3.

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- avoids the creation of new intolerable risk; - Reduces intolerable risk to tolerable or acceptable levels; - enhances community resilience; - is aligned with civil defence approaches; - prefers the use of natural features over man-made structures as defences against natural hazards; - recognises natural systems and takes a ‘whole of system’ approach; and - seeks to use the best available information/best practice.	
Policy HAZ-P2 – Manage activities to reduce the risks from natural hazards Subdivision, use and development are managed to reduce the risks from natural hazards to an acceptable or tolerable level including by: - ensuring risk is assessed for proposed activities on land subject to natural hazards; - reducing the risks associated with existing use and development where these risks are intolerable; - avoiding intolerable risk in any new use or development in areas subject to natural hazards; - minimising any increase in vulnerability due to residual risk; - avoiding the need or demand for new structural protection works; and - discouraging hard protection structures and promoting the use of alternatives to them, including natural defences in the coastal environment.	Flood risk has been specifically assessed through the SMP (refer to Appendix 14) and associated hydraulic modelling, having regard to the Site, upstream catchments, existing drainage channels and downstream flood-prone areas. The assessment includes pre and post development modelling of the 100 year climate change event and confirms that maintaining hydraulic connectivity and accommodating external catchment flows are key components of the design. The proposed stormwater system uses an integrated combination of on-lot retention, drainage corridors, constructed wetlands, flood storage and attenuation, diversion channels, high-flow bypasses and overland flow paths to manage development-generated runoff and external catchment flows. Culverts and crossings have also been designed to maintain conveyance during frequent and extreme storm events. The modelling indicates that post development flood behaviour across the wider area will generally remain unchanged or improve, with peak flows and flood levels reducing at a number of modelled locations. The proposed wetland systems also provide substantial attenuation, with the modelled total 100 year peak discharge reducing from approximately 5.9 m³/s pre-development to 4.5 m³/s post-development under climate change conditions. Overall, the proposal adopts a whole of catchment and risk-based approach to flood management, incorporates future climate conditions and uses blue-green infrastructure and engineered measures to reduce flood risk to acceptable or tolerable levels. This approach is considered consistent with Policies 1, 2 and 3.
HAZ-P3 – High impact, low probability natural hazard events The risks associated with high impact, low probability natural hazard events such as tsunami, volcanic eruptions, earthquakes and debris flows are considered, having particular regard to: - personal health and safety; - damage and/or disruption to essential community services; - the ability of a community to respond and recover; and	The proposed Brymer development is considered consistent with Policies HAZ-P1, HAZ-P2 and HAZ-P3 of the WRPS, as geotechnical natural hazard risks have been comprehensively investigated and are proposed to be managed through an integrated, risk-based approach. The GIR (refer to Appendix 17) identifies and assesses the key geotechnical hazards affecting the Site, including earthquake and liquefaction effects, cyclic softening, slope instability, compressible and expansive

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4. civil defence readiness, response and recovery planning.	soils, settlement and shallow groundwater. The GIR assesses these hazards based on their likelihood and consequence and identifies mitigation and residual risk, providing a framework to ensure that risks associated with the proposed development are reduced to acceptable or tolerable levels. In particular, liquefaction effects are to be addressed through foundation design, expansive soils through engineered clay fill, and slope instability through appropriate slope design and further stability assessment. Settlement associated with compressible soils is to be managed through ground improvement, including preloading and consolidation, thereby reducing the potential for long-term settlement and damage to buildings and infrastructure. The proposed management approach also addresses residual and construction-related risk through the GEMP (refer to Appendix 18). The GEMP provides for groundwater and ground-settlement monitoring and a Trigger Action Response Plan (TARP), enabling adverse trends or unexpected effects to be identified and responded to through appropriate mitigation and contingency measures. This combination of site-specific investigation, engineered mitigation, monitoring and adaptive management protects health and safety, avoids the creation of intolerable risk and enhances the resilience of future buildings and infrastructure without relying on new structural hazard-protection works. The GIR also specifically considers earthquake-related hazards, including seismicity, liquefaction, lateral spreading and cyclic softening, thereby addressing the high-impact, low-probability events contemplated by HAZ-P3 and incorporating appropriate mitigation into the development design. Overall, the proposed approach uses the best available site-specific information and recognised geotechnical practice to manage both existing and residual geotechnical risks and support the long-term resilience and safety of the development, consistent with HAZ-P1, HAZ-P2 and HAZ-P3.

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HAZ-P4 – Contaminated land Identify and manage contaminated land to ensure human, plant and animal health, and water, air and soil quality are protected from unacceptable risk.	The proposal is consistent with HAZ-P4, as contaminated land has been appropriately investigated and specific measures have been established to remediate and manage the identified contamination so that risks to human health and the environment are appropriately addressed. The final DSI (refer to Appendix 21), prepared and reviewed by a Suitably Qualified and Experienced Practitioner (SQEP), confirms that historic HAIL activities have affected localised areas of the Site. These comprise lead contamination associated with the cottage, asbestos associated with the cottage and implement shed at Stockyard 3, and arsenic contamination associated with Stockyards 1–3. The DSI confirms that these localised areas require appropriate management or remediation, while soils outside the identified areas are suitable to remain on Site. A Remedial Action Plan and Contaminated Site Management Plan (RAP-CSMP) (refer to Appendix 22) has been prepared for the development, which directly responds to the contamination identified through the DSI. The RAP-CSMP establishes procedures for managing contaminated soils associated with the cottage and Stockyards 1–3 during earthworks and redevelopment, including controls to manage potential exposure of workers, appropriate off-site disposal of contaminated soils, and procedures for responding to any unexpected contamination encountered during construction. It includes an accidental discovery protocol requiring works to cease and the affected area to be isolated where indicators of unexpected contamination are encountered, with the Site Manager and a SQEP to be involved before works recommence. The RAP-CSMP also establishes a specific remediation methodology for the known areas of contamination. Remediation is required within the cottage footprint and Stockyards 1–3 where arsenic, lead and/or asbestos have been identified above applicable human-health criteria. The methodology includes controlled excavation of affected soils, visual inspection for evidence of contamination, and validation

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	sampling of the walls and base of the remediation areas by a SQEP to demonstrate that the remediation has achieved the required outcome. These measures provide a clear and practicable framework for ensuring that contaminated soils are appropriately identified, handled, remediated and disposed of during development. Based on the information set out above, it is considered that the potential adverse effects associated with contaminated land can be appropriately managed and reduced to acceptable levels, and the proposal is considered to be consistent with HAZ-P4.
Historical & Cultural Values	
Objective HCV-O1 – Historic and cultural heritage Sites, structures, landscapes, areas or places of historic and cultural heritage are protected, maintained or enhanced in order to retain the identity and integrity of the Waikato region’s and New Zealand’s history and culture.	The proposal is consistent with Objective HCV-O1 as it recognises and provides for the historic and cultural heritage values associated with the site and the wider Ngāti Māhanga cultural landscape. The Cultural Impact Assessment (refer to Appendix 24) identifies the Brymer site as being located within an area of longstanding cultural significance associated with Te Ara o Kāroro, Te Uhi Pā and the historical occupation and activities of Ngāti Hourua and Ngāti Māhanga. While no recorded archaeological sites have been identified within the development footprint, the CIA confirms that the site forms part of a broader ancestral landscape where cultural values extend beyond mapped heritage features and include whakapapa, settlement patterns, movement corridors, cultural memory, wāhi tapu, urupā, whenua, wai and taonga species. The proposal incorporates a range of measures to protect and appropriately manage these heritage values, including cultural monitoring during ground disturbance, implementation of Accidental Discovery Protocols and Kōiwi Tangata Discovery Protocols, and ongoing involvement of Ngāti Māhanga throughout the development process. These measures recognise the cultural sensitivity of the area and provide mechanisms to identify, protect and appropriately respond to any archaeological

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	material, taonga tūturu or kōiwi tangata that may be encountered. In doing so, the proposal supports the protection and maintenance of the area's historic and cultural heritage values while recognising the ongoing relationship of Ngāti Māhanga with the wider cultural landscape.
HCV-P2 – Relationship of Māori to taonga Recognise and provide for the relationship of tangata whenua and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga.	The Brymer development as proposed is consistent with Policy HCV-P2 as it recognises and provides for the relationship of Ngāti Māhanga with their ancestral lands, waterways, cultural landscapes and other taonga within the development area. The Cultural Impact Assessment (refer to Appendix 24) confirms that Ngāti Māhanga hold mana whenua over the site and maintain enduring cultural, historical and whakapapa connections to the area. The site remains culturally significant due to its location within the upper Ohote Stream catchment, its connection to the Waikato River system, the presence of wetlands, peat soils and taonga species, and its association with the wider Ngāti Māhanga cultural landscape, including Te Ara o Kāroro, Te Uhi Pā and historical Ngāti Hourua occupation. The CIA notes that these values extend beyond physical sites and include relationships with whenua, wai, ecological systems and the exercise of kaitiakitanga. Cultural values have informed the masterplan, including the integration of mātauranga Māori in the wider Brymer site design, opportunities for cultural storytelling, and recognition of historical iwi associations with the land and existing waterbodies. Specifically, the proposal responds to cultural values through engagement with Ngāti Māhanga and by incorporating measures to protect and enhance wetlands, waterways and taonga species habitat, provide for cultural monitoring during earthworks and infrastructure installation, implement accidental discovery and kōiwi tangata protocols, and support ongoing mana whenua involvement in environmental management and restoration activities. The CIA concludes that, subject to the implementation of the recommended mitigation measures and cultural requirements, the proposal appropriately recognises Ngāti

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	Māhanga interests and provides opportunities for the continued exercise of kaitiakitanga over whenua, wai and taonga within the site and wider catchment.
Natural Character	
Objective NATC-O1 – Natural character The natural character of the coastal environment, wetlands, and lakes and rivers and their margins are protected from the adverse effects of inappropriate subdivision, use and development.	The Site is a highly modified rural landscape, with its existing natural character already affected by pastoral use, historic wetland drainage, straightened watercourses, artificial drains, culverts and limited riparian vegetation. Nevertheless, the LVA (refer to Appendix 12) identifies the remaining wetlands, low-lying areas, watercourses and riparian margins as containing much of the Site's remaining natural character. The proposal will result in some unavoidable modification and loss of existing freshwater features, including wetland loss, watercourse modification and culverting. It is acknowledged that these works will locally reduce the natural character and legibility of existing freshwater features. However, these effects are addressed through the wider blue-green network (refer to the EclA at Appendix 23), including retention and enhancement of wetlands, wetland creation and offsetting, new stream channels, riparian and buffer planting and stormwater treatment. These measures provide opportunities to strengthen natural characteristics along parts of the drainage network and improve the condition and coherence of the water-focused parts of the Site over time. Overall, while the development will alter the existing natural character of some wetlands and watercourses, this occurs within an already highly modified environment and is accompanied by substantial restoration, enhancement and planting. On balance, the proposal appropriately manages effects on the natural character of wetlands, watercourses and their margins and is considered generally consistent with Objective NATC-O1.

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Policy NATC-P1 – Preserve natural character Ensure that activities within the coastal environment, wetlands, and lakes and rivers and their margins are appropriate in relation to the level of natural character and: 1. where natural character is pristine or outstanding, activities should avoid adverse effects on natural character; 2. where natural elements/influences are dominant, activities should avoid significant adverse effects and avoid, remedy or mitigate other adverse effects on natural character; 3. where man-made elements/influences are dominant, it may be appropriate that activities result in further adverse effects on natural character, though opportunities to remedy or mitigate adverse effects should still be considered; 4. promote the enhancement, restoration, and rehabilitation of the natural character of the coastal environment, wetlands and lakes and rivers and their margins; and 5. regard is given to the functional necessity of activities being located in or near the coastal environment, wetlands, lakes, or rivers and their margins where no reasonably practicable alternative locations exist.	The Brymer development is considered to generally accord with Policy NATC-P1, having regard to the existing level of natural character of the Site and the measures proposed to manage and enhance freshwater features. The LVA confirms that the Site does not contain any mapped Outstanding or High Natural Character Area and forms part of a modified rural landscape, where historic drainage and pastoral use have simplified the wetland and stream network. Existing watercourses are commonly straightened, artificial, piped or culverted and generally have limited riparian vegetation. Accordingly, the proposal falls most directly within the circumstances contemplated by Policy NATC-P1(3), where existing human influences are dominant and some further adverse effects on natural character may be appropriate, provided opportunities to remedy or mitigate those effects are considered. The proposal will result in some unavoidable wetland loss, watercourse modification and culverting, and the LVA acknowledges that these works will reduce the natural character and legibility of some existing freshwater features. Importantly, the proposal also responds directly to Policy NATC-P1(4) through a substantial programme of restoration and enhancement. The blue-green network includes retained and enhanced wetlands, new wetland habitat, new stream channels, stormwater treatment and extensive riparian and buffer planting. These measures will improve habitat, water quality, shading and ecological connectivity and provide opportunities to strengthen the natural character of the water-focused parts of the Site over time. The ecological response follows the effects management hierarchy, with approximately 0.76 ha of new wetland habitat proposed alongside restoration and enhancement of retained wetlands to address residual wetland loss. Overall, while some adverse effects on the natural character of existing wetlands and watercourses will occur, these features are already substantially modified and

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	the proposal incorporates significant restoration, enhancement and mitigation measures. On balance, the development is considered generally consistent with Policy NATC-P1.
Urban Form & Development	
Objective UFD-O1 – Built environment Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by: 1. promoting positive indigenous biodiversity outcomes; 2. preserving and protecting natural character, and protecting outstanding natural features and landscapes from inappropriate subdivision, use, and development; 3. integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors; 4. integrating land use and water planning, including to ensure that sufficient water is available to support future planned growth; 5. recognising and protecting the value and long-term benefits of regionally significant infrastructure; 6. protecting access to identified significant mineral resources; 7. minimising land use conflicts, including minimising potential for reverse sensitivity; 8. anticipating and responding to changing land use pressures outside the Waikato region which may impact on the built environment within the region; 9. providing for the development, operation, maintenance and upgrading of new and existing electricity transmission and renewable electricity generation activities including small and community scale generation;	The proposed Brymer development is considered consistent with and supportive of Objective UFD-O1, as it provides for the development of the built environment in an integrated, sustainable and comprehensively planned manner which enables positive environmental, social, cultural and economic outcomes. The masterplan delivers approximately 1,043 residential units, neighbourhood-scale commercial activities, transport and three-waters infrastructure, public and recreational open space and a wider blue-green network within a staged development framework. The UDA (refer to Appendix 10) identifies that the comprehensive masterplan enables the settlement edge, movement network, housing pattern, open space and infrastructure to be planned together, providing a more coherent urban form than would arise through fragmented or piecemeal development. In relation to the specific outcomes sought by UFD-O1: • UFD-O1(1) – Indigenous biodiversity: The masterplan (refer to Appendix 6) incorporates retained and enhanced wetlands, ecological offset areas, riparian planting and other ecological features within the wider blue-green network. In particular, approximately 1.2 ha of retained wetlands will be restored through indigenous planting, buffering, stock exclusion and pest and weed control, while more than 0.75 ha of new wetland habitat will be created to address residual wetland loss. The proposal also includes restoration of modified streams through indigenous riparian planting and pest control, which will improve habitat quality and connectivity between wetlands, streams and other ecological features across the Site. The EclA (refer to Appendix 23) estimates

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10. promoting a viable and vibrant central business district in Hamilton city, with a supporting network of sub-regional and town centres; and 11. providing for a range of commercial development to support the social and economic wellbeing of the region.; and 12. strategically planning for growth and development to create responsive and well-functioning urban environments, that: (a) support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change; (b) improve housing choice, quality, and affordability; (c) enable a variety of homes that enable Māori to express their cultural traditions and norms; (d) ensure sufficient development capacity, supported by integrated infrastructure provision, for identified housing and business needs in the short, medium and long term; (e) improves connectivity within urban areas, particularly by active transport and public transport; (f) take into account the values and aspirations of hapū and iwi for urban development.	that the wetland compensation package will achieve a 13.2% net positive outcome, with restored and created wetlands to be protected in perpetuity. Overall, these measures will increase indigenous vegetation, improve habitat quality and connectivity and provide for positive indigenous biodiversity outcomes as part of the development. • UFD-O1(2) – Natural character, outstanding natural features and landscapes: The LVA (refer to Appendix 12) confirms that the Site is not subject to any mapped Outstanding Natural Landscape, Outstanding Natural Feature or Outstanding/High Natural Character Area. The Site is already substantially modified through pastoral use and drainage, although wetlands, watercourses and their margins retain natural character values. While urbanisation will result in landscape change, the masterplan integrates retained and enhanced freshwater features, wetland creation, new stream channels and riparian and buffer planting within the blue-green network to strengthen natural character and ecological connectivity over time. • UFD-O1(3) – Integration of land use and infrastructure: Brymer has been comprehensively planned so that housing, the neighbourhood centre, transport connections, three-waters servicing, open space and environmental infrastructure are coordinated through the masterplan and staged delivery of the development. The UDA (refer to Appendix 10) identifies an interconnected movement network comprising a hierarchy of public roads, footpaths and shared paths, cycleways and open-space connections, together with provision for public transport through the Site. The three-waters networks will similarly be established progressively alongside development, ensuring each stage is appropriately serviced. The proposed transport and servicing infrastructure has therefore been planned as an integral part of the land-use pattern, rather

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	than retrospectively, while providing connections to the surrounding Hamilton transport and infrastructure networks. UFD-O1(4) – Integration of land use and water planning: Water supply and wastewater will connect to the IAWAI reticulated networks, while stormwater management is integrated with the Site's wetlands, watercourses and wider blue-green network. The Infrastructure Report (refer to Appendix 13) identifies the anticipated water demand associated with the development and confirms that water supply modelling has been undertaken by Mott MacDonald for HCC/IAWAI to assess the effect of Brymer, together with other fast-track developments, on the wider network. Wastewater servicing has similarly been developed in consultation with HCC and IAWAI, with the preferred connection to the Western Interceptor selected following consideration of alternative connection options and network constraints. This provides a coordinated approach to ensuring that three-waters infrastructure can support the proposed growth while appropriately managing the relationship between urbanisation, water demand, stormwater and the receiving environment. UFD-O1(5) – Regionally significant infrastructure: The development has been planned having regard to its relationship with existing strategic infrastructure, including State Highway 23 and Hamilton's wider public water and wastewater networks. Water and wastewater servicing has been developed through direct engagement with HCC and IAWAI, including assessment of existing network capacity and identification of appropriate strategic connection points. In particular, the proposed water servicing strategy utilises existing HCC bulk water infrastructure and provides for a new reservoir and associated bulk main connection, while the preferred wastewater solution connects to the Western Interceptor at Grandview Road/Avalon Drive rather than relying on existing local pump stations that are already constrained. This approach enables the

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	development to integrate with, and avoid compromising, the long-term function of the wider strategic infrastructure networks serving Hamilton and the surrounding area. • UFD-O1(6) – Significant mineral resources: There are no identified significant mineral resources within the Site, and the proposal will therefore not affect or restrict access to any such resources. • UFD-O1(7) – Land-use conflicts and reverse sensitivity: The masterplan responds to the Site's interfaces through the distribution of development intensity, setbacks and landscape treatment, including lower-intensity development at sensitive rural interfaces. This assists in providing an appropriate transition between the new urban neighbourhood, adjoining established residential areas and remaining rural land. The Site also directly adjoins Hamilton's established urban environment rather than being isolated within the wider rural landscape. • UFD-O1(8) – Changing land-use pressures outside the Waikato region: This matter is not relevant to the Brymer development, as no land-use pressures outside the Waikato region have been identified that would materially affect the proposal or the built environment within the Site. • UFD-O1(9) – Electricity transmission and renewable electricity generation: Existing electricity infrastructure has been integrated into the planning and design of the development, with WEL Networks to prepare the detailed power design. The existing 33 kV overhead lines that pass through the Site will be undergrounded between poles 547378 and 547375, with three existing poles removed and the new cables accommodated within a dedicated easement and the proposed collector-road service corridor. This will maintain the function of

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	the existing electricity network while appropriately integrating it with the planned residential environment. UFD-O1(10) – Hamilton CBD and centres network: Brymer provides a neighbourhood-scale commercial component intended to serve the day-to-day needs of the future community while complementing Hamilton's wider hierarchy of centres. The Economic Assessment (refer to Appendix 30) considers the potential effects of Brymer on the surrounding centres network, including the wider commercial and social role of those centres. Brymer residents will also generate substantial additional expenditure at commercial centres elsewhere in Hamilton as the development is progressively occupied. UFD-O1(11) – Commercial development: The masterplan provides two mixed-use commercial sites comprising approximately 2,184 m² of commercial GFA, including a superette and other neighbourhood-scale activities. This will provide convenient access to day-to-day goods and services for residents, support local employment and contribute to the social and economic wellbeing of the new community, while retaining the role of Hamilton's larger centres. UFD-O1(12)(a - f) - Strategically planned, well-functioning urban environment: Brymer has been comprehensively planned to deliver a well-functioning, connected and resilient urban environment. The development will provide approximately 1,043 dwellings across a broad range of housing typologies and densities, increasing housing choice and development capacity within the wider Hamilton market, with supporting infrastructure delivered progressively through the staged development framework. The masterplan integrates housing with local commercial activities, open space and an interconnected movement network of streets, walking and cycling connections, with provision for future public transport, supporting accessibility and reduced reliance on private vehicles. The development has also considered the current and future

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		effects of climate change, including through an integrated stormwater and blue-green network that actively manages flood and stormwater risk. Importantly, the Site is within the rohe of Ngāti Māhanga, and the CIA (refer to Appendix 24) has informed the proposal through recognition of values associated with whenua, wai, wetlands and the wider Waikato River system, with provision for ongoing tangata whenua involvement and cultural values and narratives to inform the future neighbourhood. Collectively, these measures address the outcomes sought by UFD-O1(12)(a)–(f) and support the strategic delivery of a well-functioning urban environment.
Objective UFD-O2 – Housing bottom lines for the Future Proof area The housing bottom lines for sufficient, feasible, reasonably expected to be realised development capacity for housing in the Future Proof area are met, in accordance with the requirements of the National Policy Statement on Urban Development (NPS UD) 2020.		The proposal is considered consistent with and supportive of Objective UFD-O2, as Brymer will make a material contribution to the housing development capacity available within the wider Future Proof housing market. The Economic Assessment (refer to Appendix 30) identifies strong and continuing housing demand across Hamilton and the lower Waikato District over the short, medium and long term, with growth expected to exceed currently planned capacity. The 2023 Future Proof Housing and Business Development Capacity Assessment identified capacity shortfalls in Hamilton, while the updated economic analysis indicates that these growth pressures remain and are expected to increase. Brymer will provide approximately 1,043 additional dwellings through a staged development programme. The Economic Assessment concludes that approximately 380 dwellings delivered by the end of the medium term are expected to represent a net addition to housing supply, with the balance delivered over the long term. At full development, all approximately 1,043 dwellings are expected to represent a net addition to housing supply, reflecting projected demand exceeding available capacity. The assessment also identifies updated projected capacity shortfalls of approximately 1,900 dwellings in the medium term and 6,700 dwellings in the long

Area	Housing bottom lines (number of dwellings)		
	Short to Medium (2020-2030)	Long term (2031-2050)	Total
Future Proof Sub-Region	25,300	46,800	72,100

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	term under the relevant assessment scenario, demonstrating the importance of additional development capacity such as Brymer. Accordingly, while Brymer does not itself determine whether the Future Proof housing bottom lines of 25,300 dwellings in the short to medium term and 46,800 dwellings in the long term are met, it will provide a substantive additional source of housing capacity that assists the Future Proof area in meeting and maintaining those minimum requirements. The proposal therefore directly supports the outcome sought by Objective UFD-O2.
Policy UFD-P1 – Planned and co-ordinated subdivision, use and development Subdivision, use and development of the built environment, including transport, occurs in a planned and co-ordinated manner which: 1. has regard to the principles in APP11; 2. recognises and addresses potential cumulative effects of subdivision, use and development; 3. is based on sufficient information to allow assessment of the potential long-term effects of subdivision, use and development; and 4. has regard to the existing built environment.	The proposed Brymer development is consistent with and supportive of Policies UFD-P1 and UFD-P2, as it represents a comprehensively planned and staged urban development in which land use, transport, three-waters infrastructure, open space and environmental features are coordinated through the masterplan and proposed consent framework. The UDA (refer to Appendix 10) assesses Brymer as an integrated subdivision and land-use development and confirms that the masterplan coordinates the land-use structure, movement network, housing typologies, blue-green network and public-space interfaces. The proposal also responds to the existing built environment, forming a logical physical extension of Hamilton's western urban edge while managing interfaces with existing residential areas, rural land, Te Kootii Park and SH23. Accordingly, the proposal has been developed having regard to the existing environment and the cumulative and long-term implications of establishing a substantial new urban neighbourhood, consistent with UFD-P1(1)–(4).
Policy UFD-P2 – Co-ordinating growth and infrastructure Management of the built environment ensures: (a) the nature, timing and sequencing of new development is co-ordinated with the development, funding, implementation and operation of transport and other infrastructure, in order to: (b) optimise the efficient and affordable provision of both the development and the infrastructure; (c) maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure; (d) protect investment in existing infrastructure; and	In regards to APP11, the Brymer development has been comprehensively planned having regard to the relevant APP11 General Development Principles. In particular, the proposal supports the logical extension of Hamilton's existing urban area and provides a compact and connected urban form, with housing, neighbourhood-scale

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(e) ensure new development does not occur until provision for appropriate infrastructure necessary to service the development is in place; (f) the spatial pattern of land use development, as it is likely to develop over at least a 30-year period, is understood sufficiently to inform reviews of the Regional Land Transport Plan. As a minimum, this will require the development and maintenance of growth strategies where strong population growth is anticipated or as required for tier 3 local authorities as set out in UFD-P18 and its associated methods; (g) the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained; and (h) a co-ordinated and integrated approach across regional and district boundaries and between agencies; and (i) that where new infrastructure is provided by the private sector, it does not compromise the function of existing, or the planned provision of, infrastructure provided by central, regional and local government agencies.	commercial activities, open space and an integrated walking, cycling and transport network. Land use and infrastructure are coordinated through the masterplan and staged delivery framework, including transport and three-waters servicing. The proposal also responds to the Site's environmental constraints and values through its blue-green and stormwater network, management of natural hazards and land stability, and landscape and ecological measures. The development has considered climate change and supports reduced reliance on private vehicles through active transport and provision for future public transport. The proposal also recognises the Site's location within the rohe of Ngāti Māhanga, with tangata whenua values and aspirations informing the development through engagement and the CIA (refer to Appendix 24). While the proposal will result in the urbanisation of land containing some highly productive land, this matter is addressed separately against the NPS-HPL. Overall, Brymer is considered to appropriately respond to the relevant APP11 principles and supports an integrated, sustainable and well-functioning urban environment. Consistent with UFD-P1 and UFD-P2(a)–(e), the development will be delivered through a multi-staged framework so that subdivision, land use and supporting infrastructure proceed progressively and in a coordinated manner, with each stage appropriately serviced. Water and wastewater servicing will connect to the IAWAI networks, supported by key infrastructure including a new 6 ML water reservoir to supplement the constrained Dinsdale Reservoir and a central wastewater pump station with a staged rising main connection to the Western Interceptor. The Infrastructure Report confirms that three-waters, transport and utility services can be delivered through a logical, risk-managed staging programme without generating adverse effects on existing infrastructure, subject to the proposed conditions and staged delivery framework. The transport network is similarly integrated with development, providing collector and local roads, dedicated cycleways, footpaths

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	and public transport routes connecting to Whatawhata Road and Grandview Road, with the Integrated Transportation Assessment confirming that transport effects are manageable. Overall, this approach aligns the timing and sequencing of development with the infrastructure necessary to support it, while maintaining the safe and efficient operation of the wider infrastructure and transport networks. The proposal also responds appropriately to the broader outcomes sought by UFD-P2(f)–(h). While the Site is not currently identified as a Future Proof growth area, it directly adjoins Hamilton's established urban environment and is connected to the wider city through Brymer Road and SH23. The masterplan provides for longer-term connections to adjoining land and the wider transport network without relying on those future connections for its core functionality. The Economic Assessment (refer to Appendix 30) demonstrates that this additional capacity responds to significant growth pressures across Hamilton and the lower Waikato District, with housing demand expected to exceed planned capacity over the medium and long term. Importantly, the proposed infrastructure has been planned having regard to the capacity and operation of the existing and planned wider networks. Water and wastewater servicing has been developed in consultation with HCC and IAWAI, with network modelling and a staged servicing strategy used to identify existing constraints and the infrastructure required as development progresses. This includes a new 6 ML water reservoir to supplement the constrained Dinsdale Reservoir and a central wastewater pump station with a staged rising main to the Western Interceptor. The transport network has similarly been assessed through the ITA (refer to Appendix 16), which concludes that, subject to the recommended mitigation and conditions, the transport effects of the development can be appropriately managed without unacceptable adverse effects on the safety or efficiency of the wider transport network. The Infrastructure Report (refer to Appendix 13) also confirms that WEL Networks, Tuatahi First Fibre and Firstgas have

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	confirmed that the development can be serviced for power, communications and gas, with detailed utility designs to be developed at the subsequent design stage. Overall, the Infrastructure Report (refer to Appendix 13) concludes that, subject to the proposed conditions and staged delivery framework, Brymer can proceed without generating adverse effects on existing infrastructure, thereby maintaining the function of the wider infrastructure network and avoiding compromising existing or planned public infrastructure. Overall, the comprehensive masterplan, staged delivery framework and coordination of land use with transport and three-waters infrastructure provide a clear basis for ensuring that Brymer develops in a planned, integrated and infrastructure led approach.
Policy UFD-P4 – Energy Demand Management Development should minimise transport, energy demand and waste production, encourage beneficial re-use of waste materials, and promote the efficient use of energy.	The proposed Brymer development is considered consistent with Policy UFD-P4, particularly through the establishment of a compact, connected and walkable urban form that supports reduced transport and energy demand. The masterplan provides an interconnected movement network comprising a hierarchy of streets, footpaths, pedestrian connections and cycling routes that connect residential areas with the neighbourhood commercial sites, parks and reserves, and the surrounding transport network. The street network also provides for future public transport on selected routes. Together, these measures provide greater transport choice, encourage walking and cycling for local trips and reduce reliance on private vehicles, thereby supporting more efficient transport energy use. The integration of approximately 1,043 dwellings with local commercial activities, including a superette, and an extensive open-space network further supports opportunities for residents to meet some day-to-day needs within the neighbourhood. With respect to waste and resource efficiency, the earthworks strategy seeks to make efficient use of material generated on the Site, including the

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	use of on-site cut material for preloading areas of peat. Collectively, the compact urban form, mixed-use layout and integrated active and public transport network support reduced transport demand and more efficient energy use, consistent with Policy UFD-P4.
UFD-P11 – Adopting Future Proof land use pattern Within the Future Proof area: (1) new urban development shall occur within the Urban and Village Enablement Areas indicated on Map 43 and outlined in Table 34; (2) new residential (including rural-residential) development shall be managed in accordance with the timing indicated on Map 43 or in accordance with the timing provided for within an operative Future Development Strategy for the Future Proof sub-region in accordance with the National Policy Statement on Urban Development 2020); (3) new residential (including rural-residential) development and sensitive activities shall not be located in a strategic industrial node on land either zoned for industrial uses, or deferred industrial uses or identified as a future industrial growth area; (4) new industrial development should predominantly be located in the strategic industrial nodes in Table 34 (APP12) and Map 43 and in accordance with the indicative timings in that table except as set out in clause (8) below; (5) other industrial development should only occur within the Urban Enablement Areas indicated on Map 43, unless there is a need for the industry to locate in the rural area in close proximity to the primary product source. Industrial development in urban areas other	The proposed Brymer development is not fully consistent with the directive land-use pattern in Policy UFD-P11, as the Site is not located within an Urban or Village Enablement Area identified on Map 43 and its urbanisation is therefore not anticipated by the operative Future Proof growth pattern or sequencing. The UDA (refer to Appendix 10) expressly acknowledges this strategic context. Clauses (3)–(7) are not materially relevant, as Brymer does not propose industrial development. However, UFD-P11(8) specifically recognises that alternative urban land-release patterns may be promoted where they are out-of-sequence or unanticipated, including outside identified enablement areas, provided adequate justification is demonstrated. In this context, there are a number of factors that support Brymer as an appropriate urban development notwithstanding its departure from the mapped Future Proof pattern. In particular: • Brymer is not an isolated or dispersed greenfield development. The approximately 81 ha Site directly adjoins Hamilton’s established western urban edge along much of its eastern and north-eastern boundary and is connected to the wider city through Brymer Road and SH23. The UDA (refer to Appendix 10) considers the proposal to form a logical physical continuation of the adjoining urban area, with opportunities for longer-term connections to surrounding land and the wider transport network. • The Economic Assessment (refer to Appendix 30) demonstrates that the housing market context has materially changed from that underpinning earlier

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than the strategic industrial nodes indicated by Table 34 (APP12) and Map 43 shall be provided for as appropriate in district plans; (6) new industrial development outside the strategic industrial nodes or outside the allocation limits set out in Table 34 and Map 43 shall not be of a scale or location where the development undermines the role of any strategic industrial node as set out in Table 34 and Map 43; (7) new industrial development outside the strategic industrial nodes must avoid, remedy or mitigate adverse effects on the transport system, and on other infrastructure; (8) where alternative urban land release patterns are promoted, either out-of-sequence or unanticipated on Map 43 or in Table 34, including proposals outside of the urban or village enablement areas indicated on Map 43, through district plan and development area processes, justification shall be provided to demonstrate consistency with the principles of the Future Proof land use pattern and particular regard shall be had to the proposed development capacity only where the local authority determines that the urban development proposal is significant, by assessing the proposal for consistency with the operative Future Development Strategy for the Future Proof sub-region and responsive planning criteria in APP13; and (9) where land is required for activities that require direct access to Hamilton Airport runways and where these activities cannot be accommodated within the industrial land allocation in Table 34, such activities may be provided for within other land adjacent to the runways, providing adverse effects on the transport network and other infrastructure are avoided, remedied or mitigated.	strategic planning. The 2023 Future Proof HBA identified substantial capacity shortfalls in Hamilton, while updated analysis identifies continuing strong demand and infrastructure constraints affecting the realisation of brownfield capacity. Under the updated High Series projections, demand is expected to exceed currently planned capacity, with a potential long-term shortfall of approximately 16,700 dwellings across the combined Hamilton and lower Waikato market. • Brymer will respond materially to that shortfall through the staged provision of approximately 1,043 dwellings across a range of housing typologies and densities. The economic modelling specifically assesses Brymer against the permitted baseline and concludes that the proposal increasingly provides a net addition to housing supply as planned capacity is absorbed. • The proposal is comprehensively masterplanned rather than representing ad hoc urban encroachment. Housing, the neighbourhood centre, transport connections, three-waters infrastructure, open space and the blue-green network have been planned together, with density distributed in response to the movement network, topography, environmental features and surrounding interfaces. • As addressed elsewhere in this assessment, Brymer also responds to the wider principles underpinning the Future Proof land-use pattern, including integrated infrastructure provision, a compact and connected urban form, housing choice, active and future public transport, environmental management and tangata whenua values. Accordingly, while Brymer departs from UFD-P11(1) and (2) because it is an unanticipated urban growth location, that inconsistency should be considered in the context of UFD-P11(8) and the updated evidence of housing demand, development-

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	capacity shortfalls and the Site's direct relationship with Hamilton's existing urban edge. The proposal represents a comprehensively planned urban extension capable of providing a substantial net addition to housing supply rather than dispersed or isolated development. For completeness, the Brymer proposal has been assessed against APP13 in the WRPS as set out and summarised below: Criteria A • A - Demonstrated housing need/shortfall: Brymer will add approximately 1,043 dwellings to the Hamilton/lower Waikato housing market. The Economic Assessment (refer to Appendix 30) identifies strong short, medium and long-term housing demand and a potential long-term shortfall of approximately 16,700 dwellings across the combined market under the High Series projections. • B – Well-functioning urban environment and competitive markets: Brymer provides a broad range of dwelling typologies, sizes and price points, neighbourhood-scale commercial activities, open space and an integrated movement network. The additional housing capacity will also expand housing choice and support the competitive operation of land and development markets. • C – Future Proof principles and growth management directives: While Brymer is outside the identified Future Proof growth pattern, the proposal is generally aligned with the underlying principles of integrated and well-planned urban growth, including compact urban form, infrastructure coordination, housing choice, connectivity and environmental management. The Site directly adjoins Hamilton's existing urban edge rather than establishing an isolated settlement. • D – Accessibility: Brymer adjoins the established Hamilton urban area and provides connections to the surrounding road, open-space and movement

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	networks. Internally, the masterplan incorporates connected streets, footpaths, pedestrian and cycling connections and provision for future public transport, improving access between housing, local services and open spaces. • E – Commitment and capacity to deliver: The proposal is structured as a staged development, with subdivision, housing and supporting infrastructure to be delivered progressively. • F – Replacement of planned land use: Brymer does not replace land identified for planned residential, commercial or industrial urban growth; rather, it proposes urbanisation of currently rural land outside an identified Future Proof growth area. This criterion is therefore not directly relevant. • G – Human health: Potential risks to human health have been specifically investigated through the contamination, geotechnical, noise and other technical assessments, with mitigation and management measures incorporated into the proposal and proposed consent framework. • H – Affordable housing: The Economic Assessment (refer to Appendix 30) identifies a meaningful affordability contribution, with up to approximately 24% of dwellings expected to fall within the identified affordability benchmark, compared with 12% of recent greenfield new-build sales and 6% of current new-build listings. • I & J – Effects on infrastructure and committed infrastructure investment: The development has been comprehensively planned alongside its transport and three-waters requirements, with infrastructure delivered progressively to align with staging and network capacity. It will integrate with the adjoining urban reticulated network, with the Applicant funding required infrastructure and upgrades and paying applicable development contributions. For water supply and wastewater, the staged development provides an opportunity to

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	coordinate appropriately sized, catchment-wide solutions that may also support the servicing of surrounding land. The final scope, timing, sizing and funding of this infrastructure will be determined through further investigation and the PDA process, including appropriate allocation of costs where wider network benefits are provided. The proposed conditions provide for infrastructure to be delivered sequentially with development. Accordingly, the proposal will not compromise existing or planned infrastructure investment and has the potential to improve infrastructure efficiency, capacity and resilience within the wider sub-region. • K – Public financial resources/cost neutrality: The development is expected to achieve a high degree of cost neutrality for public finances, as the developer will fund the infrastructure required to service Brymer. This reduces reliance on local authority or central government funding, avoids unnecessary pressure on public debt, and supports the efficient use of public financial resources. • L – Compatibility with adjacent land uses: The masterplan responds to its interfaces with established Hamilton residential neighbourhoods, remaining rural land, Te Kootii Park and SH23 through the distribution of density, setbacks, landscaping and built-form controls, providing an appropriate transition between land uses. • M – Mode shift: The interconnected walking and cycling network and provision for future public transport support greater transport choice and reduced reliance on private vehicles, consistent with the longer-term direction toward a multimodal transport network. • N – Greenhouse gas emissions and climate resilience: The compact mixed-use layout and active/public transport provision support reduced transport emissions. The development also responds to current and future climate

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	effects through its integrated stormwater and blue-green network and associated flood and groundwater management measures. • O – Wāhi toitū: The Site is not identified as wāhi toitū. Accordingly, the specific considerations relating to the protection and provision for wāhi toitū values are not engaged by the Brymer development, and this criterion is not considered applicable. • P – Development on wāhi toitū: The Site is not identified as wāhi toitū. Accordingly, the specific considerations relating to the protection and provision for wāhi toitū values are not engaged by the Brymer development, and this criterion is not considered applicable. • Q – Wāhi toiora: The Site is not identified as wāhi toitū. Accordingly, the specific considerations relating to the protection and provision for wāhi toitū values are not engaged by the Brymer development, and this criterion is not considered applicable. Criteria B • A – Effects on planned growth areas: The Economic Assessment (refer to Appendix 30) specifically considers potential displacement of housing growth from planned areas. While some displacement may occur during the earlier stages, strong projected demand means Brymer increasingly becomes a net addition to housing supply as existing planned capacity is absorbed. • B – Value capture and cost neutrality: The proposal demonstrates that value capture and cost neutrality for public finance can be achieved, with infrastructure required to service Brymer funded by the developer through the proposed Private Developer Agreement (PDA), including network extensions and applicable development contributions. This internalises infrastructure

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	costs to the development rather than existing ratepayers, while any displacement of development contribution revenue elsewhere is limited to a short-term timing effect. Accordingly, the proposal provides an appropriate value-capture mechanism without imposing a material additional burden on public finances. • C – Function and vitality of existing settlements/urban areas: Brymer forms a logical extension of Hamilton rather than a competing standalone settlement. Its neighbourhood commercial component is limited to local convenience needs, while the Economic Assessment concludes that Brymer households will generate substantial additional expenditure supporting established Hamilton centres. • D – Housing type/tenure/price-point need: Brymer provides substantial housing diversity, including apartments, terraces, duplexes and detached dwellings across a wide range of sizes. The Economic Assessment, particularly the affordability component indicates that this mix provides greater opportunity for smaller and lower-priced housing products than is typically available in Hamilton's greenfield market, with up to 24% of dwellings potentially meeting the identified affordability benchmark. Overall, Brymer responds strongly to the substantive housing, urban-form, accessibility and well-functioning urban-environment criteria in APP13. On balance, these factors provide a strong planning justification for the Brymer development notwithstanding its departure from the currently mapped Future Proof land-use pattern.
UFD-P12 – Density targets for Future Proof area Future Proof territorial authorities shall seek to achieve compact urban environments that:	The proposed Brymer development is considered generally consistent with and supportive of Policy UFD-P12, as it provides a compact, mixed-density urban form that supports housing choice, local services and multi-modal transport. While the

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(1) support existing commercial centres; (2) support multi-modal transport options, including active transport and rapid and frequent public transport; (3) allow people to live, work and play within their local area.; (4) support the delivery of a range of housing options; (5) enable building heights and density of urban form to realise as much development capacity as possible to maximise benefits of intensification within city centre zones unless modified to accommodate a qualifying matter; (6) enable building heights and density of urban form to reflect demand for housing and business use in metropolitan centre zones, and in all cases building heights of at least 6 storeys unless modified to accommodate a qualifying matter; (7) enable building heights of at least 6 storeys within at least a walkable catchment of existing and planned rapid transit stops, the edge of city centre zones and the edge of metropolitan centre zones unless modified to accommodate a qualifying matter; (8) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and density of urban form should be enabled, commensurate with the level of commercial activities and community services unless modified to accommodate a qualifying matter; and (9) provide for high-quality urban environments that respond positively to local context, recognising that amenity values of the urban and built	Site is not one of the defined locations for which a specific net density target is prescribed in UFD-P12, the broader compact urban form outcomes sought by the policy remain relevant. Brymer provides approximately 1,043 dwellings across a deliberately graduated range of densities and typologies, including apartments, terraces, duplexes and detached dwellings. The proposed density is reflected not only in the overall yield, but in the compact lot pattern, with the substantial majority of fee-simple residential lots being 450 m² or smaller, including approximately 47 lots of 150 m² or less and 250 lots between 150–300 m². The masterplan includes 109 terrace units and 62 units on compact 7.5–8 m duplex lots, together with 10–13 m lots capable of accommodating detached or duplex housing. Higher-intensity housing is concentrated around the proposed neighbourhood commercial centre, public open spaces and principal movement routes, where it can support local activity and walkability, while lower-density housing responds to the Site's physical constraints and sensitive interfaces. The masterplan further supports the compact urban environment sought by UFD-P12 through an interconnected walking, cycling and street network, provision for future public transport, and neighbourhood-scale commercial activities, enabling residents to access local services and open spaces without relying solely on private vehicles. The proposed commercial centre is appropriately scaled to its neighbourhood role and is consistent with the scale of other neighbourhood centres in Hamilton, thereby complementing rather than competing with the established centres network. The UDA (refer to Appendix 10) also demonstrates that the distribution of density and built form responds to topography, wetlands and watercourses, existing residential interfaces and the movement network, supporting a high-quality urban environment responsive to its local context.

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form in areas planned for intensification will develop and change over time and such change is not, in and of itself, an adverse effect. In doing so, development provisions shall seek to achieve the following minimum net target densities (dwellings per hectare) in defined locations. To the extent that requirements in UFD-P12 above may result in a higher density for certain areas than the density identified in the table below, those higher densities shall prevail. [Refer to UFD-P12 for specific density target table]	Accordingly, although no specific UFD-P12 density target applies to the Brymer Site, the proposal delivers the broader outcomes sought by the policy through a compact, connected and mixed-density urban form that provides housing choice, supports local commercial activity and facilitates active and future public transport modes. On this basis, the proposal is considered generally consistent with Policy UFD-P12.
Policy UFD-P13 – Commercial Development in the Future Proof Area Management of the built environment in the Future Proof area shall provide for varying levels of commercial development to meet the wider community’s social and economic needs, primarily through the encouragement and consolidation of such activities in existing commercial centres, and predominantly in those centres identified in Table 37 (APP12). Commercial development is to be managed to: 1. support and sustain the vitality and viability of existing commercial centres identified in Table 37 (APP12); 2. support and sustain existing physical resources, and ensure the continuing ability to make efficient use of, and undertake long-term planning and management for the transport network, and other public and private infrastructure resources including community facilities; 3. recognise, maintain and enhance the Hamilton Central Business District as the primary commercial, civic and social centre of the Future Proof area, by: (a) encouraging the greatest diversity, scale and intensity of activities in the Hamilton Central Business District; (b) managing development within areas outside the Central Business District to avoid adverse effects on the function, vitality or amenity	The proposed Brymer development is consistent with Policy UFD-P13, as the commercial component has been deliberately limited to a neighbourhood-scale convenience centre that supports the day-to-day needs of the future Brymer community without undermining the role, function or vitality of Hamilton’s established commercial centres. The masterplan provides two mixed-use commercial sites comprising approximately 2,184 m² of commercial GFA, including a superette and other convenience retail, hospitality and household service activities. The commercial centre assessment within the Economic Assessment (refer to Appendix 30) confirms that the proposed scale and activity mix are comparable with other neighbourhood centres in Hamilton and appropriate for an outer suburban location. Importantly, the proposed centre is intended to meet only a minor proportion of the total retail and service demand generated by Brymer households, with comparison retail, full-service supermarkets and higher-order commercial needs continuing to be met by established centres within Hamilton. The Economic Assessment identifies that once Brymer is fully developed, its households are expected to support approximately 9,900 m² of commercial floorspace outside

Objective / Policy	Comment
of the Central Business District beyond those effects ordinarily associated with trade competition on trade competitors; and (c) encouraging and supporting the enhancement of amenity values, particularly in areas where pedestrian activity is concentrated. 4. recognise that in addition to retail activity, the Hamilton Central Business District and town centres outside Hamilton are also centres of administration, office and civic activity. These activities will not occur to any significant extent in Hamilton outside the Central Business District in order to maintain and enhance the Hamilton Central Business District as the primary commercial, civic and social centre; 5. recognise, maintain and enhance the function of sub-regional commercial centres by: (a) maintaining and enhancing their role as centres primarily for retail activity; and (b) recognising that the sub-regional centres have limited non-retail economic and social activities; 6. maintain industrially zoned land for industrial activities unless it is ancillary to those industrial activities, while also recognising that specific types of commercial development may be appropriately located in industrially zoned land; and 7. ensure new commercial centres are only developed where they are consistent with (1) to (6) of this policy. New centres will avoid adverse effects, both individually and cumulatively on: (a) the distribution, function and infrastructure associated with those centres identified in Table 37 (APP12); (b) people and communities who rely on those centres identified in Table 37 (APP12) for their social and economic wellbeing, and require ease of access to such centres by a variety of transport modes; (c) the efficiency, safety and function of the transportation network; and	Brymer, increasing to approximately 10,800 m² in the long term. This additional expenditure will support the vitality and viability of the wider centres network rather than creating a competing higher-order centre. The assessment has also specifically considered potential distributional effects on surrounding centres, including Nawton and Dinsdale, and concludes that the proposed Brymer centre is unlikely to materially undermine their performance. Only around 2–3% of the expenditure generated by Brymer households and spent outside the development would need to be captured by Nawton and Dinsdale to offset any expenditure redirected to the Brymer centre, with those established centres expected to capture significantly greater shares due to their larger and more diverse retail offerings. The limited scale and convenience-focused role of the Brymer centre similarly ensures it will not compete with the Hamilton CBD's role as the primary commercial, civic and social centre of the Future Proof area. Accordingly, Brymer provides an appropriately scaled commercial component that supports the social and economic needs of the new community while maintaining the established hierarchy, function and vitality of Hamilton's existing centres, consistent with the outcomes sought by Policy UFD-P13.

Objective / Policy	Comment
(d) the extent and character of industrial land and associated physical resources, including through the avoidance of reverse sensitivity effects. 8. recognise that in the long term, the function of sub-regional and town centres listed in Table 37 may change.	

Waikato Regional Plan

The following chapters are not considered relevant, and are not assessed in the table below:

- Chapter 1 (Approaches to Resource Management) is administrative and does not include objectives and policies.
- Chapter 6 (Air Module) is not relevant to this application as resource consent is not required for discharge to air.
- Chapter 7 (Geothermal Module) is not relevant to this application as no activities are proposed in relation to geothermal activities.

Objective / Policy	Comment
Chapter 2: Matters of Significance to Māori	
2.3 Tangata Whenua Relationship with Natural and Physical Resources	
Objective 2.3.2 1. Uncertainty for all parties regarding the relationship between tangata whenua and resources for which they are Kaitiaki minimised. 2. Tangata whenua able to give effect to kaitiakitanga	The Brymer proposal is consistent with Objective 2.3.2 as it clearly recognises Ngāti Māhanga as mana whenua and acknowledges their ongoing role as kaitiaki of the whenua, wai and taonga within the development area. The Cultural Impact Assessment (refer to Appendix 24) confirms that Ngāti Māhanga hold mana whenua over the site and maintain enduring responsibilities for the protection and management of natural and physical resources within the upper Ohote Stream catchment and wider Waikato River catchment. The CIA identifies a range of culturally significant resources associated with the site, including wetlands, groundwater systems, peat soils, waterways and taonga species, and provides a clear framework for how these values should be protected and managed throughout the life of the development. The proposal reduces uncertainty regarding the relationship between tangata whenua and these resources by establishing ongoing engagement with Ngāti Māhanga and providing for their involvement in cultural monitoring, ecological restoration, groundwater and wetland management, adaptive management processes, and the review of key environmental management plans. The CIA specifically seeks continued participation by Ngāti Māhanga during detailed design,

Barker & Associates

+64 375 0900 | admin@barker.co.nz | barker.co.nz

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Objective / Policy	Comment
	construction, monitoring and operational phases, recognising that the exercise of kaitiakitanga extends beyond the consenting process. Through these commitments, the proposal supports Ngāti Māhanga's ability to give effect to kaitiakitanga and provides a clear and enduring framework for mana whenua involvement in the stewardship of natural and physical resources within the site and wider catchment.
Policy 2.3.3.2 Increase Awareness Promote methods that will increase community awareness of the relationship between tangata whenua and the natural and physical resources for which they are Kaitiaki.	The proposed Brymer development is consistent with Policy 2.3.3.2. The CIA (refer to Appendix 24) prepared by Ngāti Māhanga provides an important mechanism for increasing awareness of the relationship between tangata whenua and the natural and physical resources within and connected to the Site. In particular, it identifies the cultural significance of whenua and wai, wetlands, groundwater and peat systems, and taonga species, and explains the relationship of these resources to the exercise of kaitiakitanga. The CIA also recognises that the Site's waterways form part of a broader ecological and cultural network extending through the Ohote Stream catchment to the Waikato River. The proposal also provides for the ongoing involvement of Ngāti Māhanga as the development progresses, rather than limiting tangata whenua involvement to the consenting process. The CIA seeks ongoing engagement as part of the exercise of kaitiakitanga, while the SMP provides for Ngāti Māhanga to review final stormwater design and receive monitoring information relating to groundwater, water quality and wetland health at agreed intervals. This ongoing involvement will assist the Project team and future decision-makers to better understand and respond to the relationship of tangata whenua with the Site's natural resources. Accordingly, the proposal provides appropriate opportunities to increase awareness of tangata whenua values and kaitiakitanga and is considered consistent with Policy 2.3.3.2.
Chapter 3: Water Module	
3.1 Water Resources	

Objective / Policy	Comment
Objective 3.1.2 The management of water bodies in a way which ensures: (a) That people are able to take and use water for their social, economic and cultural wellbeing (b) Net improvement of water quality across the Region (c) The avoidance of significant adverse effects on aquatic ecosystems (d) The characteristics of flow regimes are enhanced where practicable and justified by the ecological benefits (e) The range of uses of water reliant on the characteristics of flow regimes are maintained or enhanced (f) The range of uses of water reliant on the characteristics of flow regimes are maintained or enhanced (g) Inefficient use of the available ground surface water resources is minimised (h) An increase in the extent and quality of the Region's wetlands (i) That significant adverse effects on the relationship tangata whenua as Kaitiaki have with water and their identified taonga such as waahi tapu, and native flora and fauna that have customary and traditional uses in or on the margins of water bodies, are remedied or mitigated (j) The cumulative adverse effects on the relationship tangata whenua as Kaitiaki have with water their identified taonga such as waahi tapu, and native flora and fauna that have customary and traditional uses that are in or on the margins of water bodies are remedied or mitigated (k) The management of non-point source discharges of nutrients, faecal coliforms and sediment to levels that are consistent with the identified purpose and values for which the water body is being managed (l) The natural character of the coastal environment, wetlands and lakes and rivers and their margins (including caves), is preserved and protected from inappropriate use and development	The Brymer development is considered to generally accord with Objective 3.1.2, with the proposed development, stormwater, groundwater and ecological responses collectively seeking to manage water resources in an integrated manner. In particular: • The development will be supplied from the Waikato River through the existing Hamilton/IAWAI water supply network, with no new intake infrastructure required within the river. The authorised take is up to 1,323 m³/day, and the water demand has been calculated in accordance with RITS and the HCC Water Management Plan. The WRC assessment concluded that the environmental effects of the take are likely to be less than minor. • Stormwater will be managed through an integrated treatment train incorporating on-lot retention/soakage, sediment forebays, constructed wetlands, extended detention, attenuation and controlled discharge. This will manage contaminants and runoff before discharge to the receiving environment. The EclA (refer to Appendix 23) concludes that, with the proposed stormwater mitigation, effects on downstream aquatic environments will be low, while construction-related sediment effects will be managed through erosion and sediment controls. • The stormwater design seeks to maintain existing discharge locations and hydrological connectivity, with peak flows attenuated to no more than 80% of pre-development flows for relevant design events and soakage used where practicable to replenish groundwater and minimise runoff. Groundwater effects have also been assessed as localised and temporary, with long-term groundwater diversion representing redistribution within the Site catchment rather than a net loss. • While approximately 0.51 ha of modified natural wetland will be removed, residual effects are addressed through wetland restoration and creation. The

Objective / Policy	Comment
(m) Ground water quality is maintained or enhanced and ground water takes managed to ensure sustainable yield (n) Shallow ground water takes do not adversely affect values for which any potentially affected surface water body is managed (o) Concentrations of contaminants leaching from land use activities and non-point source discharges to shallow ground water and surface waters do not reach levels that present significant risks to human health or aquatic ecosystems (p) That the positive effects of water resource use activities and associated existing lawfully established infrastructure are recognised, whilst avoiding, remedying or mitigating adverse effects on the environment. (q) Refer to Objective 3.A.1.	EclA predicts a 13.2% net gain from the wetland compensation package. Reduced recharge to retained wetlands has also been specifically addressed by redirecting treated stormwater to their upper reaches. Stream restoration, indigenous riparian planting, creation of new watercourse habitat and improvements to fish passage will further contribute to freshwater ecological outcomes. The stormwater response has had regard to the CIA and the relationship of Ngāti Māhanga with freshwater. Relevant recommendations include maintaining hydrological integrity and wetland function, achieving appropriate stormwater discharge quality and ongoing engagement and monitoring relating to groundwater, water quality and wetland health. Overall, although the development will modify some existing freshwater features, the proposal combines water-efficient servicing, stormwater treatment and attenuation, groundwater management, wetland restoration and creation, stream enhancement and cultural considerations. These measures appropriately manage adverse effects while providing opportunities to improve freshwater and wetland values and are considered consistent with the outcomes sought by Objective 3.1.2.
3.2 Management of Water Resources	
Policy 3.2.3.1 Management of Water Bodies Manage all water bodies to enable a range of water use activities, whilst ensuring that a net improvement in water quality across the Region is achieved over time through: (a) Classifying and mapping water bodies based on the characteristics for which they are valued and implementing the classification through a mixture of regulatory and non-regulatory methods. (b) Maintaining overall water quality in areas where it is high, and in other water bodies, avoiding, remedying or mitigating cumulative	The Brymer development is considered to generally accord with Policy 3.2.3.1, with the proposed stormwater, ecological and groundwater measures designed to avoid further degradation of receiving water bodies and, where practicable, improve existing freshwater values. The existing drains and modified watercourses within the Site have relatively poor water quality associated with their predominantly agricultural catchment, including elevated nutrients, suspended solids and bacteria and low summer dissolved oxygen.

Objective / Policy	Comment
degradation of water quality from the effects of resource use activities. (c) Enhancing the quality of degraded waterbodies. (d) Providing for the mitigation and remediation of adverse effects in accordance with Section 1.3.3 of the Waikato Regional Policy Statement. (e) Recognising the positive benefits to people and communities arising from use or development of water resources and by taking account of existing uses of water and the associated lawfully established infrastructure.	The proposed stormwater system adopts an integrated treatment train approach, including on-lot retention and soakage, forebays, constructed wetlands, extended detention and controlled discharge. These measures will capture sediment and contaminants, manage runoff volumes and provide water quality treatment before discharge to the receiving environment. The EclA (refer to Appendix 23) concludes that treated stormwater will meet the relevant guidelines, with residual effects on the downstream aquatic environment assessed as low. Construction related sediment effects will similarly be managed through erosion and sediment controls. The proposal also provides opportunities to enhance existing degraded freshwater environments through restoration and indigenous planting of modified streams, enhancement and creation of wetlands, improved fish passage and the conversion of artificial drains to planted swales. Groundwater and surface-water interactions have also informed the design, including redirection of treated stormwater to retained wetlands where development would otherwise reduce recharge. The positive social and economic benefits associated with the use of water resources are also recognised. Water supply for the development will utilise the existing Hamilton/IAWAI intake and reticulated network, with no additional infrastructure required within the Waikato River, and WRC has assessed the environmental effects of the associated water take as less than minor subject to conditions. Overall, the proposal appropriately balances the use and development of water resources with measures to protect and improve water quality and freshwater values, consistent with Policy 3.2.3.1.
Policy 3.2.3.2 Manging Degraded Water Bodies Enhance the quality of degraded water through improved management of activities that affect water bodies so that: (a) For activities controlled by rules in the Plan:	The Brymer development is considered to generally be consistent with Policy 3.2.3.2, particularly given the existing degraded condition of freshwater environments within the Site. The EclA (refer to Appendix 23) identifies the artificial drains and modified

Objective / Policy	Comment
(i) discharges to water will not further degrade water quality with respect to those parameters of the relevant class(es) for that water body that are not currently met (ii) land-based treatment systems will be promoted where soil type and drainage will allow, and where adverse effects are less than the adverse effects of direct discharges into water (iii) water allocation takes into account the additional adverse effect of reduced flow in degraded waters on aquatic ecosystems and human uses and values. (b) For activities covered by non-regulatory methods in the Plan, promote: (i) land management methods that reduce non-point source discharges (ii) riparian management that mitigates the effect of non-point source discharges on water bodies.	watercourses as having poor water quality and very low ecological function, reflecting their existing agricultural setting. The proposal seeks to ensure that development does not further degrade these water bodies through an integrated stormwater treatment approach. Stormwater will be managed using on lot retention and soakage, pre-treatment, constructed wetlands, extended detention and controlled discharge, consistent with WRC guidance. This is complemented by ecological enhancement measures, including approximately 749 m of indigenous riparian planting along existing artificial drains, which will improve bank stability, reduce erosion and support improved water quality and aquatic habitat. The change from agricultural land use, together with the proposed stormwater wetlands, is also expected to reduce nutrient inputs to shallow groundwater, while construction related sediment risks will be managed through erosion and sediment controls. The proposed Waikato River water take has separately been assessed by WRC as having less than minor environmental effects, including in relation to flow regimes and freshwater species. Overall, the proposal appropriately manages activities affecting existing degraded water bodies and incorporates measures that will avoid further degradation while providing opportunities to improve water quality, riparian condition and freshwater ecological values over time.
Policy 3.2.3.3 Natural Character Recognise, and where relevant provide for, the following characteristics when considering the preservation of the natural character of lakes and rivers and their margins and the protection of them from inappropriate use and development: (a) Diversity and composition of aquatic and riparian habitat.	The Brymer development is considered consistent with Policy 3.2.3.3, having regard to the existing condition and natural character of the Site's freshwater features. The LVA (refer to Appendix 12) identifies the Site as a modified rural landscape, where historic drainage and pastoral use have simplified the wetland and stream network. The remaining natural character is concentrated around low-lying areas, wetlands,

Objective / Policy	Comment
(b) Topography and physical composition of river and lake beds and the course of the river. (c) The natural flow characteristics and hydraulic processes (such as sediment transport) of rivers and streams or the pattern and range of water level fluctuations that occur naturally in rivers and lakes. (d) Any significant natural features of the lakes and rivers and their margins.	watercourses and riparian margins, although many of these features are already highly modified. The EclA (refer to Appendix 23) similarly identifies the artificial drains as having negligible ecological value and the modified watercourses as having low ecological value, reflecting their straightened and channelised form, limited habitat diversity and lack of established riparian vegetation. While the proposal will result in some watercourse loss, culverting and modification, these effects are accompanied by stream restoration, new stream habitat, wetland creation and extensive indigenous riparian and buffer planting. The wider blue-green network will therefore provide opportunities to improve habitat diversity and strengthen the natural character and legibility of freshwater corridors over time. The hydrological characteristics of the watercourses have also informed the design. The stormwater system provides for retention, attenuation and controlled discharge to maintain hydraulic connectivity and reduce erosion effects, while the Groundwater Assessment (refer to Appendix 20) concludes that the development is not expected to materially alter the overall groundwater flow regime or catchment water balance. No Outstanding Natural Feature, Outstanding Natural Character Area or High Natural Character Area is identified within the Site. Overall, the proposal appropriately recognises the existing aquatic, riparian, physical and hydrological characteristics of the Site's water bodies and incorporates substantial restoration and enhancement measures, and is therefore considered generally consistent with Policy 3.2.3.3.
Policy 3.2.3.4 Waikato Region Surface Water Class Enable the use of all surface water bodies in the Region, provided that: (a) Any significant adverse effects on existing aquatic ecosystems are avoided, remedied or mitigated.	The Brymer development is considered to align with Policy 3.2.3.4, particularly having regard to the separately authorised water take from the Waikato River and the proposed management of stormwater discharges from the Site.

Objective / Policy	Comment
(b) Intake structures are designed to minimise fish entrapment. (c) Any conspicuous change in visual colour or clarity is avoided, remedied or mitigated. (d) The water body is not tainted or contaminated to the extent that it is unpalatable or unsuitable for consumption by humans after treatment (equivalent to coagulation, filtration and disinfection). (e) The water body is not tainted or contaminated to the extent that it is unsuitable for irrigation or stock watering.	The Brymer water take authorises up to 1,323 m³/day (15.3 L/s) from the Waikato River for residential and commercial water supply, using HCC/IAWAI's existing intake infrastructure. WRC assessed the effects of the take on both flow regimes and aquatic biota and concluded that the associated environmental effects would be less than minor. Conditions restricting abstraction during low-flow conditions ensure sufficient water remains for instream environmental requirements and other authorised takes. In relation to fish entrainment, no new intake structure is required. The existing HCC intake is subject to requirements addressing intake velocity and effects on aquatic fauna, with monitoring confirming maximum intake velocities are below the 0.3 m/s standard applicable at this location. WRC therefore concluded that use of the existing intake structure would have less than minor effects on freshwater species. The proposal will also not introduce untreated stormwater directly to receiving water bodies. Stormwater will pass through an integrated treatment train incorporating source controls, sediment forebays, constructed wetlands, attenuation and controlled discharge, which is specifically designed to manage water quality before discharge. These measures will minimise sediment and contaminant inputs and therefore avoid inappropriate changes in water clarity or water quality that could affect the suitability of downstream water for existing uses. Overall, the proposal enables the use of surface water while appropriately managing effects on aquatic ecosystems, fish entrainment and receiving-water quality and is therefore considered consistent with Policy 3.2.3.4.
3.3 Water Takes	
Objective 3.3.2	The proposal is consistent with Objective 3.3.2. Water required to service Brymer has been addressed through a separate resource consent process outside the Fast-track application, with Waikato Regional Council granting water permit AUTH148775.01.01

Objective / Policy	Comment
(a) Giving effect to the overarching purpose of the Vision and Strategy to restore and protect the health and wellbeing of the Waikato River for present and future generations. (b) The availability of water to meet the existing and the reasonably justified and foreseeable future domestic or municipal supply requirements of individuals and communities and the reasonable needs for an individual's animal drinking water requirements. (c) The recognition of the significant community benefits that derive from domestic or municipal supply takes. (d) The efficient allocation and the efficient use of water. (e) No further allocation of water that exceeds the primary allocation in Table 3-5 that reduces the generation of electricity from renewable energy sources. (f) The recognition that existing water takes contribute to social and economic wellbeing and in some cases significant investment relies on the continuation of those takes, including rural-based activities such as agriculture, perishable food processing and industry. (g) The continued availability of water for cooling of the Huntly Power Station. (h) Sufficient water is retained instream to safeguard the life supporting capacity of freshwater, including its ecosystem processes and indigenous species and their associated ecosystems. (i) That decisions regarding the allocation and use of water take account of the need to avoid the further degradation of water quality, having regard to the contaminant assimilative capacity of water bodies. (j) Subject to Objectives a) to h) above, the availability of water to meet other future social, economic and cultural needs of individuals and communities (including rural-based activities such as agriculture, perishable food processing and industry). (k) Refer to Objective 3.A.1.	to take water from the Waikato River specifically for municipal supply to the Brymer development (refer to Appendix 31). The consent authorises up to 1,323 m³/day and 392,742 m³/year. In granting the consent, WRC determined that the take remains within the primary allocable flow of the Waikato River, with water remaining available for allocation. Conditions require reductions during low-flow periods to safeguard instream environmental requirements and other authorised takes, with cumulative effects on the flow regime assessed as less than minor. The proposal also makes efficient use of existing infrastructure, with water to be taken and treated through the existing HCC/IAWAI intake and Waiora Water Treatment Plant and distributed through the existing network, avoiding the need for additional infrastructure within the Waikato River. The consent incorporates demand forecasting, water measurement and reporting, low-flow restrictions and ongoing Water Management Plan requirements to promote efficient and sustainable water use. WRC also specifically assessed the take against the Vision and Strategy for the Waikato River and concluded that it is consistent with its purpose and principles, subject to compliance with the consent conditions. Overall, the Brymer development has an authorised municipal water supply that provides for its foreseeable community needs while maintaining environmental flows, promoting efficient water use and protecting the health and wellbeing of the Waikato River. Accordingly, the proposal is consistent with Objective 3.3.2.

Objective / Policy	Comment
3.3 Efficient Use of Water	
Policy 3.4.3.1 Manage the Use of Water Manage, through permitted activities and resource consents, the use of water, any associated discharge of water onto or into land in a manner that ensures that: (a) The overarching purpose of the Vision and Strategy to restore and protect the health and wellbeing of the Waikato River for present and future generations is given effect to (b) The further degradation of water quality is avoided (c) Any adverse changes to natural flow regimes are avoided as far as practicable and otherwise mitigated (d) Adverse effects on the relationship tangata whenua as Kaitiaki have with water are avoided, remedied or mitigated (e) Adverse effects on in-stream ecological values are avoided, remedied or mitigated (f) Adverse effects on wetlands that are habitats for significant indigenous vegetation and significant habitats for indigenous fauna are avoided, remedied, or mitigated (g) Adverse effects on groundwater quality are avoided as far as practicable and otherwise mitigated (h) Does not result in an adverse effect relating to the objectives in Chapter 5.2 of this plan (i) The benefits to be derived from the efficient take and use of water for reasonably foreseeable future uses, and in particular for domestic or municipal supply, are maintained and/ or enhanced.	The proposed water take and wider water management measures for Brymer as proposed have been designed to enable efficient municipal water supply while managing effects on the Waikato River, groundwater, wetlands and freshwater ecosystems. The authorised water take (refer to Appendix 31) provides for up to 1,323 m³/day (15.3 L/s) from the Waikato River for the residential development and neighbourhood centre. Water will be taken and treated using the existing HCC/IAWAI infrastructure, with no additional intake infrastructure required within the Waikato River. A Water Management Plan has also been prepared and demand calculated in accordance with RITS and the HCC Water Management Plan. WRC's assessment concluded that the environmental effects of the take are likely to be less than minor. The take is subject to restrictions during low-flow conditions to maintain sufficient river flows for environmental requirements and other authorised takes, with cumulative effects on flow regimes assessed as less than minor. The existing intake has also been assessed as having less than minor effects on fish and other aquatic life. More broadly, the development incorporates measures to protect water quality and freshwater values. Treated stormwater discharges are expected to meet relevant guidelines, with downstream water quality effects assessed as low. Potential effects on retained wetlands from reduced groundwater recharge will be mitigated by redirecting treated stormwater to the upper reaches of wetlands and streams, while residual wetland loss will be addressed through wetland creation and restoration, resulting in a net positive wetland outcome. Groundwater effects are assessed as localised and temporary, with long-term groundwater diversion representing redistribution within the Site catchment rather than a net loss.

Objective / Policy	Comment
	The proposal also recognises the relationship of tangata whenua with wai and the wider Waikato River catchment. The CIA (refer to Appendix 23) identifies the need to avoid cumulative degradation and support restoration outcomes consistent with Te Ture Whaimana, including through management of water takes, discharges, wetlands and connected waterways. Overall, the proposal enables the efficient use of water for municipal supply while appropriately managing effects on river flows, water quality, groundwater, wetlands and freshwater ecological values, and is therefore considered generally consistent with Policy 3.4.3.1.
Policy 3.4.3.2 Efficient Use of Water Ensure the efficient use of water by: (a) Requiring the amount of water taken and used to be reasonable and justifiable with regard to the intended use and where appropriate: (i) For domestic or municipal supplies is justified by way of a water management plan. (ii) For industry, implementation of industry good practice, in respect of the efficient use of water for that particular activity/industry. (iii) For irrigation, the following measures in relation to the maximum daily rate of abstraction, the irrigation return period and the seasonal or annual volume of the proposed take: - A maximum seasonal allocation reliability of up to 9 out of 10 years - A minimum application efficiency of 80 percent (even if the actual system being used has a lower application efficiency), or on the basis of a higher efficiency where an application is for an irrigation system with a higher efficiency (b) Requiring consideration of water conservation and minimisation methods, such as leak detection and loss monitoring as integral parts of	The Brymer development is considered to be consistent with Policy 3.4.3.2. The water take has been specifically calculated to meet the anticipated demand of the development, rather than seeking a broader allocation than is required. A Water Management Plan has been prepared in accordance with the Waikato Regional Plan, with water demand calculated using the RITS and HCC Water Management Plan requirements. The Infrastructure Report (refer to Appendix 13) similarly provides detailed design flows based on the anticipated population and staging of the development, demonstrating that the proposed water requirements have been assessed against the intended use. Alternative water supply options have also been investigated, including groundwater abstraction, treatment and storage. Test bores confirmed that groundwater quantity and quality could potentially support the development, although connection to the centralised HCC/IAWAI network is identified as providing the more viable long-term servicing approach. The stormwater strategy also incorporates measures to retain water within the Site, including on-lot soakage and/or retention tanks, consistent with

Objective / Policy	Comment
water take and use consent applications to ensure no significant wastage of water resources (c) Raising awareness amongst the regional community about water efficiency issues and techniques (d) Facilitating the transfer of water take permits, provided the transfer does not result in effects that are inconsistent with the purpose of the relevant Water Management Class, as identified by the policies in Section 3.2.3 and the water classes in Section 3.2.4 (e) Promoting investigation of alternatives to the water take, alternative water sources, water harvesting (excluding the Waikato River catchment above Karapiro Dam) and seasonal storage, as an integral part of water take and use consent applications. (f) Promoting shared use and management of water through water user groups or other arrangements where there is increased efficiency in the use and allocation of water.	the RITS hierarchy which prioritises retention and reuse of rainwater/stormwater where practicable. Overall, the proposed take of up to 1,323 m³/day is supported by a Water Management Plan and detailed demand calculations, and the investigation of alternative sources and water retention measures demonstrates appropriate consideration of efficient water use. The WRC assessment through the water take consent process has concluded that, subject to the recommended conditions, the proposed take is consistent with the relevant regional policy framework.
3.5 Discharges	
Objective 3.5.2 Discharges of contaminants to water undertaken in a manner that: (a) does not have adverse effects that are inconsistent with the water management objectives in Section 3.1.2 (b) does not have adverse effects that are inconsistent with the discharges onto or into land objectives in Section 5.2.2 (c) Ensures that decisions regarding the discharge of contaminants to water do not reduce the contaminant assimilative capacity of the water body to the extent that allocable flows as provided for in Chapter 3.3 are unable to be utilised for out of stream uses.	The Brymer development is consistent with Objective 3.5.2, with stormwater and construction related discharges designed and managed to avoid or minimise adverse effects on water quality, freshwater ecosystems and the wider receiving environment. The proposed stormwater management system adopts an integrated treatment train approach developed in accordance with RITS and relevant WRC guidance. On lot retention reduces runoff entering the network, while forebays provide sediment capture and constructed wetlands provide the primary water-quality treatment, extended detention and attenuation before stormwater is released through controlled outlets to the receiving environment. The EcIA (refer to Appendix 23) confirms that treated stormwater discharges are expected to meet the relevant guidelines and avoid adverse water-quality effects, with the residual effect on the downstream aquatic environment assessed as low following mitigation.

Objective / Policy	Comment
	Potential construction related discharges have also been addressed. Earthworks have the potential to generate sediment; however, erosion and sediment controls designed in accordance with WRC guidance will be implemented, reducing the assessed effects on water and habitat quality to low. The Groundwater Assessment (refer to Appendix 20) also identifies that the change from farming, together with the introduction of stormwater wetlands, is expected to reduce nutrient inputs to shallow groundwater, with construction sediment risks managed through the erosion and sediment control framework. The stormwater system also manages water quantity alongside water quality, including attenuation of post-development runoff and controlled discharge to protect downstream receiving environments. Accordingly, the proposed discharges are not expected to result in adverse effects inconsistent with the wider water-management objectives of the Regional Plan or materially reduce the capacity of receiving water bodies to accommodate contaminants and other authorised water uses.
Policy 3.5.3.1 Enabling Discharges to Water that will have only Minor Adverse Effects Enable through permitted and controlled activity rules, discharges to water that due to their nature, scale and location will: (a) avoid adverse effects on surface water bodies that are inconsistent with policies in Section 3.2.3 of this Plan (b) not increase the adverse effects of flooding or erosion on neighbouring properties (c) ensure that any adverse effects of sediment on aquatic habitats are confined to a small area relative to the habitat as a whole or are temporary, and the area will naturally re-establish habitat values	Operational stormwater discharges will be managed through an integrated treatment train incorporating on lot retention, forebays, constructed wetlands, attenuation and controlled outlets before discharge to existing wetlands, modified drains and watercourses. The stormwater system has been designed in accordance with RITS and relevant Waikato Regional Council stormwater guidelines, with treatment and attenuation measures intended to manage both water quality and water quantity effects. From an ecological perspective, the EclA (refer to Appendix 23) assesses the unmitigated effect of stormwater discharges on the downstream aquatic environment as moderate, reducing to an overall low level of effect once the proposed stormwater treatment and mitigation measures are implemented. The assessment confirms that treated stormwater discharges are expected to meet the

Objective / Policy	Comment
comparable with those prevailing before commencement of the activity (d) not result in significant effects on the Coastal Marine Area as identified in the Waikato Regional Coastal Plan, wetlands¹⁸ that are areas of significant indigenous vegetation and/or significant habitats of indigenous fauna, cave ecosystems or lakes (e) not have adverse effects that are inconsistent with the policies for air quality provided in Section 6.1.3 of this Plan.	relevant guidelines and avoid adverse water quality effects in the receiving environment. The receiving drains and modified watercourses are themselves generally of negligible to low ecological value, although they remain subject to measures to protect and improve aquatic habitat. Potential flooding and erosion effects are similarly addressed through attenuation and controlled discharge. The SMP (refer to Appendix 14) limits post-development discharges to a maximum of 80% of pre-development flows for the relevant design events and retains existing discharge locations, while hydraulic modelling demonstrates substantial attenuation of runoff before it enters the existing drainage network. Riprap and energy-dissipation measures are also proposed where necessary to minimise erosion and scour. Construction related discharges, including sediment-laden runoff and temporary dewatering discharges, will also be managed. The EclA identifies the potential for earthworks to discharge fine sediment to watercourses, but concludes that implementation of the proposed erosion and sediment controls and stormwater treatment will reduce the residual effect on water and habitat quality to low. Temporary dewatering effects are likewise assessed as minor and temporary where intercepted groundwater is returned to the receiving drainage network to maintain flows. The proposal also specifically manages effects on natural wetlands by maintaining hydrological connections and, where development would otherwise reduce groundwater recharge, redirecting treated stormwater to retained wetlands and streams. Accordingly, the proposed discharges are expected to avoid significant adverse effects on aquatic habitats and wetlands, avoid increased flooding or erosion effects on neighbouring properties, and appropriately manage sediment and water

Objective / Policy	Comment
	quality effects. The proposal is therefore considered consistent with the outcomes sought by Policy 3.5.3.1.
Policy 3.5.3.4 Discharges to Land Ensure that the discharge of contaminants onto or into land maximises the reuse of nutrients and water contained in the discharge.	The Brymer development is considered to be consistent with Policy 3.5.3.4, particularly through the proposed approach to stormwater retention and soakage. The SMP (refer to Appendix 14) adopts the RITS stormwater hierarchy, which prioritises retention of rainwater and stormwater for reuse on-site, followed by soakage, ahead of discharge to surface water or the piped network. The proposed system includes on lot retention and soakage, with soakage used where practicable to replenish groundwater and reduce the volume of runoff leaving the Site. In particular, the Infrastructure Report (refer to Appendix 13) confirms that on lot soakage devices will provide soakage and treatment up to the water quality volume, with excess flows then conveyed to the wider stormwater treatment system. This approach makes beneficial use of stormwater within the Site and assists in maintaining groundwater recharge rather than simply conveying all runoff directly to the receiving environment. The Groundwater Assessment (refer to Appendix 20) also confirms that treated stormwater will be redirected to the upper reaches of retained wetlands and streams where necessary to address reductions in recharge associated with development. While the proposal does not involve a land discharge specifically intended for nutrient reuse, the proposed stormwater approach appropriately provides for the retention, infiltration and beneficial reuse of water where practicable. Accordingly, the proposal is considered consistent with the intent of Policy 3.5.3.4.

Objective / Policy	Comment
Policy 3.5.3.5 Ground Water Minimise the adverse effects of discharges onto or into land on ground water quality by ensuring that they: (a) do not compromise existing or reasonably foreseeable uses of ground water (b) avoid adverse effects on surface water bodies that are inconsistent with the policies in Section 3.2.3 of this Plan as far as practicable and otherwise, remedy or mitigate those effects (c) are not inconsistent with the policies in Section 3.8.3 that manage the effects of drilling and discharges associated with drilling on ground water quality.	The potential effects of discharges to land on groundwater quality and connected surface water bodies has been specifically considered through the Groundwater Assessment and SMP (refer to Appendix 14 and 20). The proposed stormwater system incorporates on lot retention and soakage where practicable, with stormwater management designed in accordance with WRC guidance and RITS. Runoff from impervious areas will be treated before discharge to the receiving environment, including through the proposed stormwater wetlands, while soakage will assist in replenishing groundwater and reducing runoff volumes. The Groundwater Assessment concludes that the change from the existing farming land use, together with the introduction of stormwater wetlands, is expected to reduce nutrient inputs to shallow groundwater. Construction-related sediment risks will be managed through erosion and sediment controls. The assessment also confirms that groundwater effects associated with construction dewatering and the long-term operation of the stormwater wetlands will be localised and, during construction, temporary. Importantly, groundwater drawdown is not expected to affect the availability of water from nearby groundwater abstraction bores. Potential effects on connected surface water bodies have also been addressed through the stormwater design, including redirecting treated stormwater to retained wetlands and streams where development would otherwise reduce groundwater recharge. Accordingly, the proposal is not expected to compromise existing or reasonably foreseeable groundwater uses or result in unacceptable effects on groundwater quality or connected surface water bodies and is considered consistent with Policy 3.5.3.5.

Objective / Policy	Comment
Policy 3.5.3.6 Tangata Whenua Uses and Values Ensure that the relationship of tangata whenua as Kaitiaki with water is recognised and provided for to avoid significant adverse effects and remedy or mitigate cumulative adverse effects on: (a) the mauri of water (b) waahi tapu sites (c) other identified taonga.	The proposal is consistent with Policy 3.5.3.6 as it recognises the relationship of Ngāti Māhanga as kaitiaki with the waterways, wetlands, groundwater systems and taonga species associated with the site and wider Waikato River catchment. The Cultural Impact Assessment included at Appendix 24 identifies the site as being located within the upper Ohote Stream catchment, with wetlands, drains and groundwater systems that are hydrologically connected to the Waikato River. The CIA emphasises that these water bodies carry mauri and whakapapa and that the protection of water quality, wetland function, groundwater stability and ecological health is fundamental to maintaining the relationship of Ngāti Māhanga with wai and associated taonga. The proposal incorporates a range of measures that seek to avoid significant adverse effects on the mauri of water and remedy or mitigate potential cumulative effects, including groundwater monitoring, stormwater treatment and management, wetland retention and enhancement, protection of taonga species habitat, and adaptive management frameworks for water quality and hydrological effects. The CIA also provides for ongoing involvement of Ngāti Māhanga in monitoring, environmental management and decision-making, ensuring that kaitiakitanga can continue to be exercised throughout the life of the development. In addition, cultural monitoring and accidental discovery protocols provide mechanisms to appropriately manage any wāhi tapu, taonga tūturu or kōiwi tangata that may be encountered during development. Subject to the implementation of these measures, the proposal appropriately recognises and provides for tangata whenua values associated with water, wāhi tapu and other identified taonga.
Policy 3.5.3.7 Stormwater Discharges Encourage at-source management and treatment of stormwater discharges to reduce water quality and water quantity effects of discharges on receiving waters.	The proposed stormwater strategy for Brymer incorporates both at-source management and a treatment train approach to manage water quality and quantity effects on receiving waters.

Objective / Policy	Comment
	At-source management is provided through on lot retention and soakage, which retains the initial abstraction volume and reduces the volume of runoff entering the downstream stormwater network. The Infrastructure Report (refer to Appendix 13) also identifies source controls including the use of inert roofing materials and pre-treatment of driveway runoff through catch pits before soakage or on-site retention. Runoff exceeding on-lot capacity is conveyed through a treatment train incorporating forebays and constructed wetlands, which provide sediment capture, water quality treatment, extended detention, attenuation and flood storage before controlled discharge to the receiving environment. The stormwater system also manages water quantity effects through attenuation and controlled discharge, including limiting post-development peak flows to no more than 80% of pre-development flows where applicable. The EclA (refer to Appendix 23) concludes that, with the proposed stormwater mitigation measures, treated discharges will meet the relevant water quality guidelines and the residual effect on the downstream aquatic environment will be low. Overall, the combination of source control, on-lot retention and soakage, treatment and attenuation before discharge is directly consistent with the approach encouraged by Policy 3.5.3.7.
3.6 Damming and Diverting	
Objective 3.6.2 Damming and/or diverting of water undertaken in a manner that: (a) Does not have adverse effects that are inconsistent with the water management objectives in Section 3.1.2. (b) Does not have adverse effects that are inconsistent with the river and lake bed structures objectives in Section 4.2.2.	The proposal does not involve the damming of water, but does involve the diversion and management of water associated with the proposed stormwater network and modification of existing drainage features. This includes diversion channels, modified drains, culverts, stormwater wetlands and controlled outlets, which have been designed as an integrated system to maintain hydraulic connectivity and appropriately manage the conveyance of water through the Site.

Objective / Policy	Comment
(c) Does not obstruct fish passage where it would otherwise occur in the absence of unnatural barriers, so that trout or indigenous fish can complete their lifecycle. (d) Results in no increase in the adverse effects of flooding or land instability hazards. (e) Results in no loss of existing aquatic habitats as a consequence of channelisation of rivers. (f) Increases the use of off-stream dams for water supply purposes as an alternative to dams in perennial streams. (g) ensures that decisions regarding the damming and diverting of water take account of the consequent loss of water quality and any associated reduction in contaminant assimilative capacity, minimum flows and allocable flows for out of stream uses as provided by Section 3.3.3 Policy 1 and Table 3-5 of Chapter 3.3. (h) Refer to Objective 3.A.1.	The proposed diversions and associated structures have been informed by hydraulic modelling to assess upstream and downstream water levels and ensure that existing stream and flood flows can continue to be conveyed through the Site. The proposed culverts have been sized and configured to accommodate both frequent and extreme storm events, maintain the function of the existing drainage system and minimise adverse effects on the surrounding floodplain. The wider stormwater system also incorporates on lot retention, wetland storage, attenuation and controlled outlets, with modelling demonstrating substantial attenuation of post-development runoff before discharge to the existing drainage network. The proposal will result in some modification and removal of existing freshwater features, including approximately 133 m of modified ephemeral watercourse and a number of artificial drains. However, the affected modified watercourse has low ecological function and value, and residual effects will be addressed through creation of new ephemeral stream habitat and restoration of remaining modified watercourses to ensure no net loss of stream extent. Culverts across modified natural watercourses will maintain the conveyance of stream flows beneath the road network, with their design also seeking to retain natural stream processes and provide for fish and other aquatic life to move through the crossings. Overall, while the development involves the diversion and modification of some existing water flows and drainage features, these activities have been designed to maintain hydraulic and ecological connectivity, avoid increasing flood risk, manage effects on water quality and aquatic habitat, and provide appropriate restoration and enhancement where freshwater features are affected. The proposal is therefore considered generally consistent with the outcomes sought by Objective 3.6.2.
Policy 3.6.3.1 Off-Stream Dams and Dams or Diversions on Ephemeral Systems	The Brymer proposal does not involve the damming of water, but does include diversion and modification of water associated with the stormwater network and

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Enable through permitted activity rules the use of off-stream dams, or dams and diversions on ephemeral streams where: (a) Adverse effects on surface water bodies that are inconsistent with the policies in Section 3.2.3 of this Plan are avoided. (b) The use, erection, reconstruction, placement, alteration or extension of structures on the beds of lakes or rivers associated with the activity avoid adverse effects that are inconsistent with the policies in Section 4.2.3. (c) The damming and diversion does not increase the adverse effects of flooding or erosion on neighbouring properties. (d) Changes in the catchment and sediment transport processes have no significant adverse effects on water quality, aquatic habitat and flow regimes in perennial streams. (e) Any significant adverse effect on cave systems are avoided or mitigated. (f) Any adverse effects on wetlands that are areas of significant indigenous vegetation and/or significant habitats of indigenous fauna are avoided, remedied or mitigated in accordance with Policies 1 and 2 of Chapter 3.7. (g) Existing legal public access to and along lakes and rivers is maintained where appropriate.	existing drainage features, including effects on a modified ephemeral watercourse. Approximately 133 m of modified ephemeral watercourse (W2a) will be removed, with residual effects addressed through creation of approximately 144 m of new ephemeral watercourse and restoration of remaining modified watercourses, thereby ensuring no net loss of stream extent. The proposed diversion channels and culverts have been informed by hydraulic modelling and designed to maintain the conveyance of existing channel and drain flows through the Site. The modelling confirms that the culverts can accommodate frequent and extreme storm events, maintain flood conveyance and minimise adverse effects on the surrounding floodplain. Riprap and energy-dissipation measures are also proposed to minimise erosion at culvert inlets and outlets. The wider stormwater system provides substantial attenuation of post-development runoff before discharge to the existing drainage network, further reducing the potential for increased downstream flooding and erosion. Effects on aquatic habitat and wetlands have also been specifically addressed. Culvert design seeks to retain natural stream processes and provide for fish passage, while ecological mitigation includes stream restoration, riparian planting and improved fish passage. Although approximately 0.51 ha of natural wetland will be removed, approximately 1.2 ha of retained wetlands will be restored and more than 0.75 ha of new wetland created as part of the residual effects package. Overall, the proposed diversion and modification activities have been designed to maintain drainage and flood conveyance, minimise erosion and water-quality effects, provide for aquatic connectivity, and appropriately manage effects on freshwater and wetland habitat. The proposal is therefore considered generally consistent with Policy 3.6.3.1.

Objective / Policy	Comment
Policy 3.6.3.3 Tangata Whenua Uses and Values Ensure that the relationship of tangata whenua as Kaitiaki with water is recognised and provided for, to avoid significant adverse effects and remedy or mitigate cumulative adverse effects on: (a) the mauri of water, (b) waahi tapu sites, (c) other identified taonga.	The proposal is consistent with Policy 3.5.3.6 as it recognises the relationship of Ngāti Māhanga as kaitiaki with the waterways, wetlands, groundwater systems and taonga species associated with the site and wider Waikato River catchment. The Cultural Impact Assessment included at Appendix 23, identifies the site as being located within the upper Ohote Stream catchment, with wetlands, drains and groundwater systems that are hydrologically connected to the Waikato River. The CIA emphasises that these water bodies carry mauri and whakapapa and that the protection of water quality, wetland function, groundwater stability and ecological health is fundamental to maintaining the relationship of Ngāti Māhanga with wai and associated taonga. The proposal incorporates a range of measures that seek to avoid significant adverse effects on the mauri of water and remedy or mitigate potential cumulative effects, including groundwater monitoring, stormwater treatment and management, wetland retention and enhancement, protection of taonga species habitat, and adaptive management frameworks for water quality and hydrological effects. The CIA also provides for ongoing involvement of Ngāti Māhanga in monitoring, environmental management and decision-making, ensuring that kaitiakitanga can continue to be exercised throughout the life of the development. In addition, cultural monitoring and accidental discovery protocols provide mechanisms to appropriately manage any wāhi tapu, taonga tūturu or kōiwi tangata that may be encountered during development. Subject to the implementation of these measures, the proposal appropriately recognises and provides for tangata whenua values associated with water, wāhi tapu and other identified taonga.
Policy 3.6.3.4 Wetlands and Peat Lakes Enhance or maintain the extent and quality of the Region’s wetlands by encouraging activities that will either maintain or reinstate agreed water levels in wetland areas or peat lakes.	While the proposal will result in the loss of approximately 0.51 ha of existing wetland, the wider ecological response includes restoration of approximately 1.2 ha of retained natural wetlands and creation of more than 0.75 ha of new wetland habitat. The proposed wetland creation area has been subject to hydrogeological assessment to

Objective / Policy	Comment
	confirm that appropriate and sustainable wetland hydrology can be established, with earthworks designed to increase water storage capacity and connect the created wetland with the water table. The stormwater and groundwater management approach also seeks to maintain the hydrology of retained wetlands. Where development would reduce groundwater recharge and potential baseflows to existing wetlands, the stormwater network has been redesigned to redirect treated stormwater to the upper reaches of retained gully wetlands and streams. The SMP (refer to Appendix 14) similarly provides for treated stormwater to be discharged to existing wetlands during lower-flow events to maintain wetland hydrology, while the design of proposed stormwater wetlands takes account of the underlying peat and seeks to maintain existing subsurface conditions. Overall, the combination of retained wetland restoration, new wetland creation and measures to maintain appropriate wetland hydrology will support the extent, quality and ongoing function of wetlands within the Site and is therefore consistent with the outcomes sought by Policy 3.6.3.4
3.7 Wetlands	
Policy 3.7.3.1 Control Land Drainage in Areas Adjacent to Identified Wetlands and Within Wetlands Ensure that land drainage activities within wetlands that are areas of significant indigenous vegetation and/or significant habitats of indigenous fauna, or immediately adjacent to wetlands identified in Section 3.7.7, are undertaken in a manner that avoids changes in water level that lead to: (a) shrinking or loss of the wetland, or (b) accelerated dewatering and oxidation, or (c) significant adverse effects on tangata whenua values of the wetland, or (d) adverse effects of flooding on neighbouring properties, or	The Brymer development is considered generally consistent with Policy 3.7.3.1. The potential for earthworks, stormwater infrastructure and development to alter groundwater levels and wetland hydrology has been specifically assessed through the Groundwater Effects Assessment (refer to Appendix 20). Groundwater monitoring undertaken across the Site has established baseline and seasonal groundwater conditions, and modelling indicates that groundwater drawdown associated with construction dewatering and the long-term operation of the proposed stormwater wetlands will be localised, with construction effects being temporary. The long-term

Objective / Policy	Comment
(e) significant adverse effects on the relationship tangata whenua as Kaitiaki have with the wetland, or (f) adverse effects on the natural character of wetlands or (g) adverse effects on the ability to use the wetlands for recreational purposes and remedy or mitigate otherwise.	diversion of groundwater to stormwater wetlands represents a redistribution of groundwater within the Site catchment rather than a net loss. The assessment identifies that development within the northern slope area would reduce groundwater recharge and potential baseflows to some retained natural wetlands. In response, the stormwater network has been specifically redesigned to redirect treated stormwater to the upper reaches of the retained gully wetlands and streams, thereby mitigating the potential reduction in recharge and assisting in maintaining wetland hydrology. The SMP (refer to Appendix 14) similarly provides for treated stormwater to be discharged to existing wetlands during lower-flow events to maintain their hydrology, together with soakage or retention measures to support groundwater recharge where required. While approximately 0.514 ha of existing wetland will be lost, this is addressed separately through the proposed wetland effects management package, including creation of at least 0.75 ha of new wetland habitat. Hydrogeological Assessment (refer to Appendix 20) has confirmed that the proposed creation area is capable of sustaining wetland hydrology. The proposal also includes restoration and enhancement of retained wetlands, which will support their ecological condition and natural character over time. Overall, the proposal has specifically considered the relationship between land drainage, groundwater and wetland water levels and incorporates measures to avoid or mitigate inappropriate dewatering of retained wetlands and maintain their hydrological function, while also managing flood effects through the wider stormwater system. It is therefore considered generally consistent with Policy 3.7.3.1.

Chapter 5: Land and Soil Module

5.1 Accelerated Erosion

Barker & Associates

+64 375 0900 | admin@barker.co.nz | barker.co.nz

Kerikeri | Whangārei | Warkworth | Auckland | Hamilton | Cambridge | Tauranga | Havelock North | Wellington | Christchurch | Wānaka & Queenstown

Objective / Policy	Comment
Objective 5.1.2 A net reduction of accelerated erosion across the Region so that: (a) soil productivity, versatility and capability is maintained (b) there are no adverse effects on water quality, aquatic ecosystems and wetlands that are inconsistent with Water Management Objective 3.1.2 (c) there is no increase in the adverse effects of flooding or land instability hazards (d) accelerated infilling of lakes, estuaries, rivers, wetlands and cave systems is avoided and the rate of infilling of artificial watercourses, excluding structures designed to trap sediment, is minimised (e) significant adverse effects on the relationship tangata whenua as Kaitiaki have with their identified ancestral taonga such as ancestral lands, water and waahi tapu are avoided (f) cumulative adverse effects on the relationship tangata whenua as Kaitiaki have with their identified taonga such as ancestral lands, water, waahi tapu are remedied or mitigated. (g) significant adverse effects on natural character and ecological values associated with land and the coastal environment including dune systems is avoided (h) there are no adverse effects on air quality that are inconsistent with Air Quality Objective 6.1.2, Objectives 2 and 3 (i) damage to property and infrastructure is avoided	The proposal is consistent with the geotechnical aspects of Objective 5.1.2. The GIR (refer to Appendix 17) identifies areas of compressible and expansive soils, shallow groundwater, liquefaction susceptibility and localised slope stability constraints, and incorporates design measures to ensure that development does not increase erosion, sedimentation, land instability or related geohazard risks. The development will incorporate engineered earthworks, preloading and consolidation of compressible soils, controlled placement of engineered fill, and appropriate cut and fill slope design. The slope stability assessment confirms that the proposed designs meet the requisite factors of safety, with further detailed design and monitoring to be undertaken where required. From an erosion and land stability perspective, the GIR (refer to Appendix 17) identifies a low to moderate risk of soil erosion associated with earthworks and the construction of swale drains and recommends geotechnical construction monitoring, good earthworks practices and appropriate erosion protection measures to minimise sediment generation and instability. Areas of unsuitable or low-strength material will be undercut, improved or replaced where required, while groundwater conditions and slope stability will be addressed through detailed design and geotechnical oversight. The GEMP (refer to Appendix 18) further supports this approach through groundwater and settlement monitoring and a Trigger Action Response Plan (TARP), enabling unexpected ground movement or settlement to be identified and responded to promptly. Dewatering and trenching will also be managed to avoid uncontrolled loss of fines, boiling, base heave and off-site settlement. The EclA (refer to Appendix 23) specifically recognises the potential for earthworks to discharge fine sediment to the Site's watercourses and assesses the unmitigated effect on water and habitat quality as potentially high. With implementation of the proposed erosion and sediment controls and treatment of stormwater during earthworks, however, the residual effect on water and habitat quality is assessed as

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	low. Erosion and sediment controls will be implemented in accordance with the relevant Waikato Regional Council guidelines, including progressive stabilisation of completed or inactive earthwork areas and ongoing inspection and maintenance of sediment control devices. These measures will minimise sediment mobilisation and the potential for downstream sedimentation or infilling of watercourses and wetlands. The CIA (refer to Appendix 24) identifies whenua, wai, wetlands, peat systems and connected waterways as culturally important to Ngāti Māhanga and recognises the need to manage both direct and cumulative effects on these values. Ngāti Māhanga's position is that adverse cultural effects can be appropriately managed where, among other matters, hydrological integrity is maintained, wetlands and peat systems are protected, cumulative effects are monitored and ongoing engagement is provided for. Subject to implementation of the proposed erosion and sediment controls and the relevant cultural requirements and monitoring, the proposal will appropriately manage accelerated erosion effects on water quality, ecological values, tangata whenua values, land stability and downstream receiving environments. Accordingly, the proposal is considered consistent with the outcomes sought by Objective 5.1.2.
Policy 5.1.3.2 Managing Activities that Cause or Have the Potential to Cause Accelerated Erosion and Encouraging Appropriate Land Management Practices Through permitted activities and non-regulatory methods manage activities that cause or have the potential to cause accelerated erosion, with particular regard to: (a) the potential for the activity to adversely affect the purpose of the water management classes as identified in the policies in Section 3.2.2, and the coastal marine area	The proposed Brymer development is considered consistent with Policy 5.1.3.2, as the potential for the proposed earthworks to cause accelerated erosion and associated geotechnical effects has been specifically assessed and appropriate measures are proposed to manage those risks. The GIR (refer to Appendix 17) identifies the principal relevant geotechnical risks as soil erosion during construction, settlement of low-lying areas, slope instability and groundwater-related effects. These risks are particularly relevant given the scale of the proposed earthworks and the presence of compressible soils and shallow groundwater. The GIR identifies engineered earthworks, preloading and consolidation of compressible soils, controlled placement of engineered fill and stable cut and fill batters as appropriate measures to manage these risks. The slope

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(b) the risk of downstream sedimentation leading to accelerated infilling of lakes, estuaries, artificial watercourses, rivers, wetlands and caves (c) the erosion potential of soil when it is disturbed or vegetation is cleared (d) the potential to increase the adverse effects of flooding (e) the potential to adversely affect waahi tapu and archaeological sites or other identified sites of importance to tangata whenua as Kaitiaki (f) the potential to adversely affect natural character of the coastal environment and the margins of rivers, lakes and wetlands and areas of significant indigenous vegetation and significant habitats of indigenous fauna (g) the potential to compromise air quality objectives as identified in Module 6 Air (h) the potential to damage property and infrastructure.	stability assessment confirms that the proposed slopes meet the requisite factors of safety under the assessed static conditions, including elevated groundwater conditions, with further assessment and detailed design where required. In direct response to the matters identified in Policy 5.1.3.2, the GIR identifies a low to moderate risk of soil erosion associated with earthworks and construction of swale drains, with the residual risk reduced through good earthworks practices, erosion protection measures, geotechnical supervision and construction monitoring. These measures, together with the proposed erosion and sediment controls, will minimise the mobilisation and downstream transport of sediment and therefore reduce the potential for adverse effects on water quality, rivers, wetlands and other receiving environments, including accelerated infilling. Stable batter slopes and geotechnical assessment of swales, ponds and other stormwater features will also minimise the potential for erosion or instability that could exacerbate flooding or damage property and infrastructure. The GEMP (refer to Appendix 18) provides an additional layer of management through groundwater and settlement monitoring and a Trigger Action Response Plan (TARP), allowing unexpected ground movement or settlement to be identified and responded to before significant effects arise. Dewatering and trenching are also required to avoid uncontrolled loss of fines, boiling, base heave and off-site settlement. Accordingly, the proposed geotechnical and earthworks measures appropriately address the erosion potential of disturbed soils and minimise consequential effects on downstream environments, land stability, flooding, property and infrastructure, consistent with Policy 5.1.3.2.
Policy 5.1.3.3 Promote Good Practice Promote, through environmental education, good practice guides and incentives, soil and land management practices that avoid adverse effects on soil productivity, capability and versatility and the off-site effects of sediment discharge, and remedies or mitigates these effect if they do occur.	The proposed Brymer development is considered consistent with Policy 5.1.3.3, as the GIR (refer to Appendix 17) identifies and recommends recognised good practice land management and earthworks measures to minimise erosion, sediment generation and land instability during development. These include appropriate management of cut and fill operations, preloading and consolidation of compressible soils, controlled

Objective / Policy	Comment
	placement of engineered fill, stable batter design, groundwater management and geotechnical construction monitoring. In particular, the GIR identifies a low to moderate risk of soil erosion associated with earthworks and construction of swale drains, with this risk reduced through good earthworks practices, erosion protection measures and geotechnical monitoring. The proposed earthworks will also be undertaken in accordance with the Waikato Regional Council's Erosion and Sediment Control Guidelines, with preventative erosion and sediment controls appropriate to the scale and nature of the works. The GEMP (refer to Appendix 18) further supports this good-practice approach by establishing monitoring and management procedures for groundwater drawdown, settlement and associated geotechnical effects. This includes groundwater and settlement monitoring and a Trigger Action Response Plan (TARP), which provides a mechanism to identify adverse trends and implement additional mitigation or remedial measures where required. Dewatering and trench works are also required to minimise open lengths and duration, maintain stable drawdown and avoid uncontrolled loss of fines or off-site settlement. Collectively, these measures represent established good-practice soil and land management and will minimise erosion and off-site sediment discharge, maintain the stability and capability of the developed land, and provide mechanisms to remedy or mitigate effects should they occur. Accordingly, the proposal is consistent with the outcomes promoted by Policy 5.1.3.3.
5.2 Discharges Onto or Into Land	
Objective 5.2.2 Discharges of wastes and hazardous substances onto or into land undertaken in a manner that: (a) does not contaminate soil to levels that present significant risks to human health or the wider environment	Stormwater management for Brymer as proposed includes on lot soakage, together with treatment and attenuation through the wider stormwater network. The stormwater system has been designed in accordance with the relevant Waikato Regional Council guidelines and RITS requirements, with soakage used where

Objective / Policy	Comment
(b) does not have adverse effects on aquatic habitats, surface water quality or ground water quality that are inconsistent with the Water Management objectives in Section 3.1.2 (c) does not have adverse effects related to particulate matter, odour or hazardous substances that are inconsistent with the Air Quality objectives in Section 6.1.2 (d) is not inconsistent with the objectives in Section 5.1.2 (e) avoids significant adverse effects on the relationship that tangata whenua as Kaitiaki have with their taonga such as ancestral lands, water and waahi tapu (f) remedies or mitigates cumulative adverse effects on the relationship that tangata whenua as Kaitiaki have with their identified taonga such as ancestral lands, water and waahi tapu.	appropriate to reduce runoff volumes and support groundwater recharge. Stormwater will otherwise be treated and conveyed through the proposed artificial wetlands and drainage network, with existing flow paths and discharge locations generally retained to minimise changes to the receiving environment. The proposal also appropriately addresses the potential for contaminants to enter land or water. The DSI (refer to Appendix 21) identifies localised areas of contaminated soil associated principally with lead, asbestos and arsenic, which will be managed through the proposed remediation works and associated contaminated site management procedures. Contaminated material requiring removal will be disposed of at an appropriately authorised facility rather than discharged elsewhere on the Site. Construction related sediment and other potential contaminants will similarly be managed through erosion and sediment controls and other site management measures to protect groundwater, surface water and downstream aquatic environments. The CIA (refer to Appendix 24) identifies the health and mauri of soils, wetlands and waterways, together with their hydrological connections to the wider Waikato River system, as important cultural values. Subject to the proposed stormwater treatment, contaminated land remediation, construction controls and cultural requirements, discharges onto or into land are therefore expected to be managed so that significant adverse effects on human health, water quality, ecological values and tangata whenua values are avoided or otherwise appropriately remedied or mitigated.
5.3 Contaminated Land	
Objective 5.3.2 Discharges of contaminants from contaminated land shall be managed so that they:	The proposal is consistent with Objective 5.3.2, as contaminated land has been appropriately investigated and specific remediation and management measures are proposed to ensure that risks to human health and the environment are appropriately managed. The DSI (refer to Appendix 21), prepared and reviewed by a SQEP, identified

Objective / Policy	Comment
(a) do not present significant risk of chronic or acute toxic effects on human health, flora or fauna due to the contamination of soil and ground or surface water (b) do not have adverse effects on water quality or aquatic ecosystems that are inconsistent with the water management objectives in Section 3.1.2 (c) there are no adverse effects on air quality that are inconsistent with air quality objectives in Section 6.1.2 (d) avoid significant adverse effects on the relationship that tangata whenua as Kaitiaki have with their identified taonga such as ancestral lands, water and waahi tapu (e) remedy or mitigate cumulative adverse effects on the relationship that tangata whenua as Kaitiaki have with their identified taonga such as ancestral lands, water and waahi tapu.	localised contamination associated with the cottage and AOC/Stockyards 1–3, including lead, asbestos and arsenic, while confirming that soils outside these identified areas are generally suitable to remain on-site. A RAP-CSMP (refer to Appendix 22) has been prepared to manage these effects during development. It requires targeted excavation and validation of contaminated soils, appropriate handling and disposal, controls on stockpiling, dust, stormwater and sediment, and procedures for unexpected contamination and groundwater encounters. These measures will minimise the potential for contaminants to migrate through soil, stormwater, sediment or air and will protect human health, ecological values and downstream receiving environments. Accordingly, the potential for discharges from contaminated land to result in significant adverse effects on people, flora, fauna, water quality, aquatic ecosystems or air quality is appropriately addressed, consistent with Objective 5.3.2. As the DSI concludes that, with the proposed management and remediation measures in place, the full site is suitable for development and contaminated land risks can be effectively managed.
Policy 5.3.3.1 Priorities for the Management of Contaminated Land List and prioritise land uses that present significant risk of contamination and give priority to managing those with the greatest risk.	As outlined above. The proposal is consistent with Policy 5.3.3.1, as potential sources of contamination have been systematically identified, investigated and prioritised through the DSI (refer to Appendix 21). The investigations confirm that contamination requiring remediation or specific management is localised to the cottage and AOC/Stockyards 1–3, associated principally with arsenic, lead and/or asbestos. These areas have therefore been identified as the priority for intervention, while soils outside the identified contaminated areas are generally suitable for retention and reuse on-site from both human health and environmental perspectives.

Objective / Policy	Comment
	A site-specific RAP-CSMP (refer to Appendix 22) has been prepared and requires targeted remediation of the cottage and Stockyards 1–3, including controlled excavation, SQEP oversight and validation sampling to confirm that the required remediation criteria have been achieved. The RAP-CSMP also establishes controls for the handling, reuse and disposal of affected soils and any unexpected contamination encountered during development. This targeted approach appropriately prioritises management of the areas presenting the greatest contamination risk and is therefore consistent with Policy 5.3.3.1.
Policy 5.3.3.3 Remediation Through rules in this Plan and resource consent processes, enable the remediation of contaminated land where the technology to be used and associated discharges are unlikely to have adverse effects that are inconsistent with the objectives or the requirements of the RMA.	As outlined above. The proposal is consistent with Policy 5.3.3.3, as the DSI (refer to Appendix 21) has identified discrete areas of contamination requiring remediation or management, principally associated with arsenic, lead and/or asbestos at the cottage and AOC/Stockyards 1–3. A site-specific RAP-CSMP (refer to Appendix 22) has been prepared and provides for targeted excavation of contaminated soils, SQEP oversight and validation sampling to confirm that remaining soils meet the applicable remediation criteria. The RAP-CSMP also establishes controls for soil handling, stockpiling and disposal, erosion and sediment control, stormwater and dust management, and unexpected contamination, thereby managing potential discharges associated with the remediation works. Accordingly, the proposed remediation can be undertaken in a controlled manner that appropriately manages potential effects on human health and the environment, consistent with the intent of Policy 5.3.3.3.

Waikato District Plan (Operative in Part)

Objective / Policy	Comment
Part 2: District-wide Matters	
<i>Strategic Direction</i>	
Objective SD-O1 – Socio-economic advancement The District has a thriving economy.	The proposed Brymer development is consistent with and supportive of Objective SD-O2, as it will make a substantial contribution to economic activity within the District and the wider Hamilton-Waikato economy. The development will provide approximately 1,043 dwellings, together with neighbourhood-scale commercial activities and supporting infrastructure, increasing housing supply, enabling population growth and generating significant construction and ongoing economic activity. The Economic Assessment (refer to Appendix 30) identifies that Brymer represents approximately 3% of projected housing growth in the Hamilton and lower Waikato District markets over the medium and long term, while also increasing housing choice and supporting a more competitive housing market. The Economic Assessment estimates approximately \$552 million of construction expenditure over the development period, supporting approximately \$278 million in discounted value added, with the majority of this economic activity expected to accrue within Hamilton and the wider sub-region. Once established, Brymer will continue to support economic activity through household expenditure and the neighbourhood commercial centre. The assessment estimates approximately \$475 million in value added from expenditure associated with net additional Brymer households, while the local centre is expected to support an average of approximately 67 jobs, increasing to around 82 by 2055. The additional population will also support established commercial centres, with the assessment concluding that Brymer is likely to provide a net economic benefit to surrounding centres rather than undermine their function or viability.

Barker & Associates

+64 375 0900 | admin@barker.co.nz | barker.co.nz

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Objective / Policy	Comment
	Accordingly, Brymer will support housing growth, investment, employment and ongoing economic activity, providing significant and enduring economic benefits and contributing positively to a thriving District economy, consistent with Objective SD-O2.
Objective SD-O2 – Tangata whenua Tangata whenua's relationships, interests, including commercial interests, and associations with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes, and other taonga are recognised and provided for.	The proposal is consistent with Objective SD-O2 as it recognises and provides for the relationship of Ngāti Māhanga with their ancestral lands, waterways, cultural landscapes and taonga within the development area. The Cultural Impact Assessment (refer to Appendix 24) confirms that Ngāti Māhanga hold mana whenua over the site and maintain enduring cultural, historical and whakapapa connections to the wider Whatawhata, Rotokauri and Hamilton West area. While the site has been modified through historical farming activities, it remains culturally significant due to its hydrological connection to the Waikato River catchment, the presence of wetlands, peat soils and taonga species, and its location within a wider Ngāti Māhanga cultural landscape associated with Te Ara o Kāroro, Te Uhi Pā and historical occupation by Ngāti Hourua. The proposal has been directly informed by ongoing consultation (refer to Planning Attachment 2) with Ngāti Māhanga and incorporates measures that support the exercise of kaitiakitanga, including wetland protection and enhancement, ecological restoration, cultural monitoring, accidental discovery protocols, and continued mana whenua involvement in environmental management and decision-making. The CIA concludes that, subject to the implementation of the recommended mitigation measures and cultural requirements, adverse cultural effects can be appropriately managed while providing opportunities for ecological restoration and improved stewardship of whenua and wai. In this way, the proposal recognises and provides for Ngāti Māhanga interests and associations with their culture, traditions, ancestral lands, waterways, taonga species and wider cultural landscape.

Objective / Policy		Comment												
Objective SD-O3 – National Policy Statement on Urban Development Housing Bottom Lines The housing bottom lines for feasible, reasonably expected to be realised development capacity for housing in the Waikato District are met, in accordance with the requirements of the National Policy Statement on Urban Development 2020.		The proposed Brymer development is consistent with and supportive of Objective SD-O3, as it will provide a substantial additional source of housing capacity within the Waikato District and wider Hamilton housing market. Brymer will provide approximately 1,043 dwellings, delivered progressively over the medium and long term, and will therefore contribute directly toward maintaining sufficient feasible and reasonably expected to be realised housing capacity.												
<table><tr><th rowspan="2">Area</th><th colspan="3">Housing Bottom Lines (number of dwellings)</th></tr><tr><th>Short Medium</th><th>to Long Term</th><th>30 Year Total</th></tr><tr><td>Waikato District</td><td>6,900</td><td>11,200</td><td>18,100</td></tr></table>		Area	Housing Bottom Lines (number of dwellings)			Short Medium	to Long Term	30 Year Total	Waikato District	6,900	11,200	18,100	The Economic Assessment (refer to Appendix 30) identifies that housing demand across Hamilton and the lower Waikato District is now materially higher than anticipated in the 2023 Future Proof HBA. In particular, updated population projections for Waikato District are between 11% and 22% higher in the long term, with the corresponding increase in dwelling demand between 31% and 67% higher than previously projected. The assessment also identifies projected greenfield capacity shortfalls across the lower Waikato District over the medium and long term, including an estimated long-term shortfall of approximately 1,100 dwellings under the Medium Series scenario.	
Area	Housing Bottom Lines (number of dwellings)													
	Short Medium	to Long Term	30 Year Total											
Waikato District	6,900	11,200	18,100											
		Importantly, approximately 380 Brymer dwellings are expected to represent a net addition to housing supply by the end of the medium term, increasing to approximately 1,043 net additional dwellings at full development. Accordingly, while Brymer does not itself determine whether the District-wide housing bottom lines of 6,900 dwellings in the short to medium term and 11,200 dwellings in the long term are met, it will make a meaningful contribution toward maintaining and increasing the development capacity required to meet those bottom lines, consistent with Objective SD-O3.												
Objective SD-O4 – Housing variety A variety of housing types are available to meet the community’s housing needs.		The proposed Brymer development is consistent with and supportive of Objective SD-O4, as it will deliver a broad range of housing types, sizes and densities to meet the differing needs of the community. The development provides for approximately												

Objective / Policy	Comment
	1,043 dwellings, including apartments, terraced housing, duplexes and detached dwellings across a range of lot sizes. The dwelling mix extends from smaller one and two bedroom apartments and terraces through to three and four bedroom duplex, terrace and detached dwellings, providing options suitable for a range of household sizes and stages of life. This variety is demonstrated through the residential typology plans (refer to Appendix 7), which provide materially different dwelling forms, sizes, lot configurations and access arrangements. The tested typologies include compact two-bedroom duplex dwellings of approximately 96–98 m², two-bedroom terrace dwellings of approximately 96–99 m² on 117 m² lots, larger three- and four-bedroom terrace dwellings, three-bedroom detached and duplex dwellings, split-level four-bedroom dwellings designed to respond to sloping sites, and larger four-bedroom detached homes. The terrace typologies also include both narrower 4.5 m and wider 7.5 m frontage products, further broadening the range of residential formats available. The Economic Assessment (refer to Appendix 30) confirms that this diversity provides meaningful housing choice across different dwelling sizes and price points. This is reinforced by the UDA (refer to Appendix 10), which identifies that the masterplan deliberately distributes different housing typologies and densities in response to the movement network, neighbourhood centre, public open spaces, topography and surrounding interfaces. More intensive apartment and terrace housing is generally located close to local services, open spaces and key movement routes, while lower-intensity housing responds to established residential and rural interfaces. Collectively, Brymer will materially increase the variety of housing available within the local and wider Hamilton housing market and therefore directly supports Objective SD-O4.

Objective / Policy	Comment
Objective SD-O5 – Integration of infrastructure and land use New development is integrated with the provision of infrastructure.	The proposed Brymer development is consistent with and supportive of Objective SD-O5, as the masterplan and staging framework have been developed in parallel with the transport, three-waters and utility infrastructure required to service the new development. The Infrastructure Report (refer to Appendix 13) confirms that the development will be supported by new internal transport, stormwater, wastewater, water, power and communications networks, with these systems progressively established as each stage is developed. In particular, wastewater servicing has been developed through consultation with WDC, HCC and IAWAI, with a staged connection strategy to the existing public network and an ultimate connection to the Western Interceptor. Stormwater management is integrated into the subdivision layout through a network of wetlands, drainage corridors, overland flow paths and on-lot devices, designed to manage both water quality and flood effects, including climate change. The road network likewise integrates walking, cycling and future public transport provision, with footpaths, dedicated cycleways and bus routes incorporated into the overall movement structure. The Infrastructure Report concludes that stormwater and wastewater servicing can be provided, that surrounding public water infrastructure can support the proposed development subject to the planned reservoir and network works, and that utility providers have confirmed capacity to service the Site for power, communications and gas. Accordingly, Brymer demonstrates a coordinated approach in which land use, staging and infrastructure provision are planned together, ensuring that development proceeds in step with the infrastructure necessary to support it, consistent with Objective SD-O5.
Objective SD-O8 – Highly productive soils	The proposal is considered to be generally consistent with the intent of Objective SD-O8, notwithstanding that the Site is not currently identified for future urban

Objective / Policy	Comment
High quality soils are protected from urban development, except in areas identified for future growth in the District Plan.	growth in the District Plan. Importantly, the detailed site-specific soil assessment undertaken by Landsystems (refer to Appendix 29) confirms that only 2.5 ha (3.2%) of the 81 ha Site meets the WDP-OiP definition of “high class soil”, comprising limited areas of LUC 2w3 and LUC 3e1 land. The remaining 96.8% of the Site is not high class soil under the WDP-OiP definition. Further, the limited areas of high class soil are small and discrete, separated from any large and geographically cohesive area of high class soil and effectively form inclusions within the more extensive surrounding LUC units. The specialist assessment concludes that these areas are not of sufficient size to be separately managed differently from the surrounding land. The productive potential of the wider Site is also materially constrained. Approximately 48% of the Site has soil wetness limitations, including poor drainage and seasonal high water tables, which restrict long-term productive use primarily to pastoral activities and limited rotational arable use during drier periods. The Rural Productivity Assessment (refer to Appendix 29) similarly identifies poor drainage, seasonal wetness, surface ponding and flooding, erosion limitations and peat subsidence as constraints on intensive primary production, and considers pastoral grazing to represent the highest and best productive use of the Site. Accordingly, while the proposal will result in the urbanisation of a small area of WDP-OiP defined high class soil, the specialist assessments demonstrate that the vast majority of the Site does not comprise high class soil and that its productive capacity is subject to significant and enduring physical limitations. In this context, the proposal does not result in the loss of a significant, cohesive high-quality soil resource, and the limited inconsistency with Objective SD-O8 should be considered

Objective / Policy	Comment
	alongside these site-specific characteristics and the wider benefits of enabling comprehensively planned urban development adjoining Hamilton.
Objective SD-09 – Rural activities The rural environment provides for a range of rural activities, including primary production and food supply.	The proposal is inconsistent with Objective SD-09 to the extent that it will permanently convert land currently used for rural activities to urban development, and therefore that part of the Site will no longer contribute directly to primary production or food supply. The Site is presently used for low-intensity pastoral grazing and areas of maize and annual grass silage production. The LVA (refer to Appendix 12) similarly recognises that the proposal represents a permanent change from an existing rural landscape to an urban residential neighbourhood. However, this inconsistency needs to be considered in the context of the Site’s limited ability to sustainably and economically support rural production over the long term. The Rural Productivity Assessment (refer to Appendix 29) concludes that pastoral grazing represents the highest and best reasonably practicable primary production use of the Site, with only limited cropping opportunities. Its productive potential is materially constrained by poorly drained soils, seasonal wetness and high water tables, sloping land, extensive drainage networks, fragmented landholdings and the proximity of Hamilton and other sensitive receptors. These constraints also limit opportunities for more intensive rural activities such as arable production and horticulture. The Rural Productivity Assessment, assessed alternative production systems and measures to retain productive capacity, including arable production, dairy farming or dairy support, commercial vegetable production, horticulture, improved land management, alternative production strategies and amalgamation. These options do not overcome the Site's physical and economic constraints, with the assessment

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	concluding that there are no reasonably practicable measures capable of materially improving its productive capacity or economic viability. The Site is also immediately adjacent to Hamilton's established urban edge and is already influenced by residential development, roads, reserves and other urban-edge activities. Its location consequently creates increasing potential for reverse-sensitivity and operational constraints on more intensive rural activities, including effects associated with dust, noise, spray drift and cropping operations. Accordingly, while the proposal does not directly achieve Objective SD-O9 because it removes the Site from rural production, the inconsistency is considered acceptable in this particular location. The Rural Productivity Assessment demonstrates that the Site does not represent an enduring or economically viable rural production resource, and its conversion will not result in a significant loss of productive capacity. In this context, comprehensively planned urban development adjoining Hamilton represents an appropriate use of the Site while the wider rural environment can continue to provide for rural activities, primary production and food supply.
Objective SD-O10 – Reverse sensitivity Existing activities and permitted land use and development are protected from reverse sensitivity effects.	The proposed Brymer development is considered generally consistent with Objective SD-O10. The Site adjoins General Rural zoned land to the north, west and south, SH23 along its southern boundary, and established residential development within Hamilton City to the east. Accordingly, the introduction of a substantial new residential community has the potential to give rise to reverse sensitivity effects. These interfaces have, however, been specifically considered through the masterplanning and technical assessments supporting the proposal. The UDA and LVA (refer to Appendices 10 and 12) demonstrate that the masterplan has been designed to carefully manage the transition between the proposed urban

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	neighbourhood and surrounding land uses. Higher-intensity housing is generally concentrated internally around the neighbourhood centre, principal movement routes and public open spaces, while lower-intensity housing, including larger lots, is used toward rural boundaries and other sensitive interfaces. Landscape and boundary planting will further assist in establishing an appropriate transition between the urban development and adjoining rural environment. The UDA also specifically identifies potential reverse sensitivity effects between residential and mixed-use activities within Brymer and concludes that these can be appropriately managed through integrated urban design, including the distribution of density and appropriate landscape, lighting and architectural responses. The potential relationship with existing rural activities also needs to be considered in its particular context. The Rural Productivity Assessment identifies that the Site and surrounding land are already influenced by Hamilton's urban edge and existing sensitive receptors, which constrain the practicability of more intensive rural activities because of potential effects associated with matters such as dust, noise and spray drift. The receiving environment is therefore already an urban-rural interface rather than an isolated rural production environment. This does not remove the need to protect existing and permitted rural activities, but it reduces the extent to which Brymer introduces a wholly new sensitivity into an otherwise unconstrained rural environment. The Acoustic Assessment (refer to Appendix 28) has considered the relationship between the development and surrounding land uses and infrastructure, including adjoining General Rural zoned properties, established Hamilton residential development and SH23. It concludes that operational noise from the development will be compatible with the anticipated acoustic environment of surrounding rural and residential areas. For SH23, dwellings within the State Highway Corridor Noise Control Boundary will be subject to the acoustic treatment requirements of NOISE-

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	R44, which can be readily achieved through standard construction measures. These measures appropriately address potential reverse sensitivity effects and protect the ongoing operation of surrounding activities and infrastructure. The ITA (refer to Appendix 16) further confirms that the proposal has been designed to maintain the safe and efficient operation of the surrounding transport network, including SH23. SH23 performs an important strategic transport function as a Limited Access Road, High Productivity Motor Vehicle route and Over Dimension route, and the proposed access arrangements have been developed having regard to these existing functions. The new SH23 access will be purpose designed and protected, with staging and access triggers ensuring that development does not proceed beyond identified thresholds until the necessary access infrastructure is in place. The ITA concludes that, subject to the recommended mitigation and conditions, the development will not have unacceptable adverse effects on the safety or efficiency of the wider transport network. Overall, while Brymer will introduce additional sensitive activities adjacent to rural land and existing transport infrastructure, the UDA, LVA, Acoustic Assessment, ITA, and Rural Productivity Assessment collectively demonstrate that these interfaces have been recognised and incorporated into the design and assessment of the proposal. The graduated density pattern, lower-intensity rural-edge treatment, landscaping and boundary responses, together with specific management of noise interfaces and transport access and staging measures that protect the ongoing function of SH23 and the wider road network, provide an appropriate framework for ensuring that existing and permitted activities can continue to operate without being unreasonably constrained by the new development. On this basis, Brymer is considered generally consistent with Objective SD-O10.

Objective / Policy	Comment
Objective SD-O13 Climate change Land use is planned to recognise, and avoid, remedy or mitigate the potential adverse effects of climate change induced weather variability and sea level rise.	The proposed Brymer development is considered consistent with Objective SD-O13. The principal climate change-related issue for the Site is the potential for increased rainfall intensity and associated stormwater and flooding effects. The Infrastructure Report and SMP (refer to Appendix 13 and 14) demonstrate that climate change has been expressly incorporated into the hydrological assessment and design of the development. In particular, the stormwater system provides conveyance for the 10-year climate change adjusted rainfall event and accommodates flows up to the 100 year event through designated overland flow paths and artificial wetlands. Post-development peak discharges are limited to no more than 80% of pre-development flows where applicable, while existing flow paths and discharge locations are retained and upstream catchment inflows have been incorporated into the modelling to avoid worsening downstream effects. The SMP adopts RCP8.5 climate change adjusted rainfall depths for its flood sensitivity assessment, including increased rainfall depths for the 10 year and 100 year events. The proposed artificial wetlands provide water quality treatment, extended detention, attenuation and flood storage, with controlled outlets and high-flow bypass arrangements enabling larger storm events to be safely managed. The Infrastructure Report also records that sensitivity testing has considered a conservative scenario in which all primary stormwater devices are blocked, with the modelling demonstrating that flood immunity can generally be maintained, subject to minor exceedances being addressed through detailed design refinements. The development also responds to the potential hydrological consequences of urbanisation through on lot soakage, retention and enhancement of drainage corridors, wetlands and riparian areas. The hydrogeological assessment (refer to Appendix 20) identifies the potential for impervious surfaces to alter groundwater recharge to existing wetlands, with the stormwater network consequently

Objective / Policy	Comment
	redesigned in relevant areas to redirect treated stormwater to retained wetlands and streams and maintain their hydrological function. Given the inland location of Brymer, sea level rise is not a material consideration for the Site. Overall, the proposal has been planned and designed having regard to increased rainfall and weather variability associated with climate change, with an integrated and climate change responsive stormwater and flood management system that avoids or mitigates consequential effects on the development and downstream receiving environment. Accordingly, the proposal is considered consistent with Objective SD-O13.
Objective SD-O14 – Well-functioning urban environment A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed Brymer development is consistent with and supportive of Objective SD-O14, as it will establish a comprehensively planned urban environment that enables people and communities to provide for their social, economic and cultural wellbeing, health and safety, now and into the future. Brymer will provide approximately 1,043 dwellings across a broad range of housing typologies and densities, together with neighbourhood-scale commercial activities, connected transport infrastructure and an integrated open space and blue-green network. The UDA (refer to Appendix 10) demonstrates that the masterplan supports a well-functioning urban environment through the coordinated distribution of housing densities, local services, open spaces and movement connections. Higher-density housing is generally located close to the neighbourhood centre, public open spaces and key movement routes, while the interconnected walking and cycling network and provision for future public transport improve accessibility and transport choice. The development also provides an extensive network of wetlands, watercourses, reserves and landscaped open spaces, supporting recreation, environmental quality and community wellbeing.

Objective / Policy	Comment
	The Economic Assessment (refer to Appendix 30) further confirms that Brymer will materially increase housing supply and choice across different dwelling sizes and price points, while the neighbourhood commercial centre will provide convenient local services and employment and complement the established Hamilton centres network. The Site is also within the rohe of Ngāti Māhanga, and engagement with tangata whenua and the incorporation of cultural values and narratives into the landscape and blue-green network provide opportunities for cultural wellbeing and identity to be expressed within the future neighbourhood. Collectively, the housing diversity, local services, transport choice, open-space network, environmental features and recognition of tangata whenua values will create a connected and well-serviced urban environment capable of meeting the present and future needs of its community. Accordingly, Brymer is considered to directly support and achieve Objective SD-O14.
Objective UFD-O1 – Urban form and development A compact urban form that provides for connected, liveable communities.	The proposed Brymer development is consistent with and supportive of Objective SD-O14, as it will establish a compact, connected and comprehensively planned extension to Hamilton’s existing urban area. The masterplan provides approximately 1,043 dwellings across a range of densities and typologies, together with neighbourhood-scale commercial activities, public open space and supporting infrastructure. The UDA (refer to Appendix 10) confirms that higher-density housing is generally concentrated around the neighbourhood centre, key movement routes and public open spaces, supporting efficient land use and a compact urban form, while lower-density development responds to the Site’s rural and established residential interfaces. The masterplan also establishes an interconnected movement and open space network, comprising a hierarchy of streets, walking and cycling connections, provision for future public transport, and links to adjoining roads, parks and

Objective / Policy	Comment
	reserves. The co-location of housing, local commercial services and recreational spaces will enable residents to meet a range of day-to-day needs locally and support reduced reliance on private vehicle travel. The Infrastructure Report (refer to Appendix 13) confirms that the transport and three-waters networks have been integrated with the masterplan and will be progressively delivered alongside development. Collectively, the coordinated provision of housing, local services, transport connections, infrastructure and an integrated blue-green and open-space network will establish a compact and well-connected neighbourhood that supports accessibility, housing choice and community wellbeing. Accordingly, Brymer is considered to directly support Objective SD-O14.
<i>Energy, infrastructure and transport</i>	
<i>AINF – All infrastructure</i>	
Objective AINF-O1 – Development, operation and maintenance of infrastructure Infrastructure is developed, operated, maintained and upgraded to enhance social, economic, cultural and environmental well-being	The proposal is consistent with Objective AINF-O1. Brymer is a comprehensively planned, multi-staged development supported by new and upgraded infrastructure necessary to service the proposed community. Water supply and wastewater will connect to the IAWAI reticulated networks, with internal reticulation and associated infrastructure established progressively as development occurs. The development also provides new transport and access infrastructure comprising a connected internal street network, footpaths, cycleways and shared paths, together with connections to the surrounding transport network and bus-capable collector roads that provide for future public transport services. The ITA (refer to Appendix 16) confirms that the proposed transport infrastructure will provide safe and efficient access while supporting walking, cycling and public transport as genuine travel choices. Access infrastructure will also be progressively delivered in accordance with identified staging triggers, including delivery of the purpose-designed SH23

Objective / Policy	Comment
	intersection as development proceeds. The development also requires the undergrounding of existing power lines within the Site. This coordinated approach enables infrastructure to be delivered alongside growth and supports the efficient and effective servicing of the development. Stormwater infrastructure has similarly been integrated into the overall development and environmental framework. The proposed system incorporates on-lot soakage, piped reticulation, artificial wetlands, attenuation and controlled discharge, while generally preserving existing flow paths and accounting for upstream catchments so that downstream effects are not worsened. The system also provides for ongoing maintenance and accessibility and incorporates opportunities for ecological enhancement through riparian planting and protection of existing vegetation and drainage corridors. Accordingly, the proposed infrastructure will support the social and economic wellbeing of the future community through safe and efficient servicing, accessibility and transport choice, while being designed and managed to appropriately address environmental effects and provide for its ongoing operation and maintenance.
AINF-P1 – Development, operation and maintenance. (1) Provide for the development, operation, maintenance, repair, replacement, upgrading and removal of infrastructure throughout the district by recognising: (a) Functional and operational needs; (b) Location, route and design needs and constraints; (c) Locational constraints related to the need to access suitable resources or sites; (d) The benefits of infrastructure to people and communities; (e) The need to quickly restore disrupted services; and	The Brymer development is considered to accord with Policy AINF-P1. The proposed infrastructure has been planned around the functional and operational requirements of the development, including the need to connect to existing water, wastewater, transport and utility networks and to provide infrastructure progressively as the Site is developed. Water supply and wastewater will connect to the IAWAI reticulated networks, with wastewater servicing staged to align with the development and ultimately connect to the Western Interceptor. The proposed pump stations include emergency storage in accordance with RITS requirements, supporting continuity and resilience of wastewater services.

Objective / Policy	Comment
(f) Its role in servicing existing consented and planned development; (g) The need for physical access to infrastructure.	The stormwater network has similarly been designed around the Site's physical and hydrological constraints and the operational requirements of the development. Each stage will incorporate the infrastructure necessary to manage its own runoff without relying on future stages, while maintaining continuity of upstream flows through the Site. Public stormwater assets will ultimately vest in Council, while appropriate arrangements will provide for the ongoing operation and maintenance of privately owned devices. Operation and maintenance plans will also be prepared for stormwater devices to be vested in Council. The stormwater treatment train incorporates on-lot retention, forebays, wetlands and controlled outlets, with features such as forebays also assisting with long-term maintenance requirements. The transport network has also been designed having regard to its functional and operational requirements and the need to integrate Brymer with the existing and planned wider transport network. The ITA (refer to Appendix 16) provides for a connected internal road hierarchy, walking and cycling infrastructure, bus-capable collector roads and connections to the surrounding transport network. Access and transport infrastructure will be progressively delivered in conjunction with development, with identified staging triggers ensuring that the necessary infrastructure is operational before development proceeds beyond specified thresholds, including delivery of the purpose-designed SH23 intersection. The ITA also confirms that the development does not trigger wider network upgrades beyond the Site access points and their immediate connections. These arrangements recognise both the functional requirements and locational constraints of the existing transport network while providing safe and efficient access and a range of transport choices for the future community. Overall, the proposed infrastructure appropriately responds to its functional, locational, access, operational and maintenance requirements, while providing the

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	infrastructure necessary to support the staged development and long-term functioning of Brymer.
Objective AINF-O7 – Integration of infrastructure with subdivision, land use and development Infrastructure is provided for, and integrated with, subdivision, use and development.	The Brymer development is considered to accord with Objective AINF-O7. The proposed infrastructure has been planned having regard to its functional and operational requirements, including the location of connections to existing networks, the physical characteristics of the Site and the need for infrastructure to be delivered progressively alongside development. Water and wastewater servicing has been developed following engagement with HCC and IAWAI, with the preferred wastewater solution connecting the development to the Western Interceptor and servicing provided in stages as the development proceeds. The proposed wastewater pump stations also incorporate emergency storage to provide resilience in the event of disruption. The stormwater network has similarly been designed so that each development stage can operate independently, with the necessary treatment, conveyance and flow-control infrastructure provided as that stage is developed. Public stormwater infrastructure will ultimately vest in Council, while private devices will remain the responsibility of property owners, with operation and maintenance plans provided for infrastructure vested in Council. The stormwater design also incorporates measures intended to simplify long-term operation and maintenance, including standardised on-lot retention devices and forebays that capture sediment before runoff enters the primary treatment wetlands. More broadly, the infrastructure will provide substantial benefits to the future community by enabling approximately 1,043 dwellings and the neighbourhood centre to be appropriately serviced. The transport network has similarly been integrated with the layout and staging of the development. The ITA (refer to Appendix 16) provides for a connected street hierarchy together with footpaths,

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	cycleways and shared paths, bus-capable collector roads and connections to the surrounding transport network. Transport infrastructure will be progressively delivered alongside development, with staging and access triggers ensuring that the necessary network capacity and access arrangements are in place as development proceeds, including construction and operation of the purpose-designed SH23 intersection before development proceeds beyond the identified Grandview Road catchment threshold. Active-mode connections will also be delivered with the relevant development stages, while the collector network provides for the future extension of public transport services through the Site. Physical access for operation and maintenance has also been incorporated where required, including maintenance access associated with the stormwater network. Overall, the proposed infrastructure is integrated with the layout and sequencing of the subdivision and appropriately responds to its functional, locational, operational and maintenance requirements, enabling the coordinated servicing of the Brymer development.
AINF-P25 – Provide adequate infrastructure Ensure adequate provision of infrastructure, including land transport networks, where land is subdivided creating one or more additional lots, excluding reserve or non-housing conservation lots, access and utility allotments, or its use is significantly changed or intensified, needing additional or upgraded infrastructure.	The Brymer subdivision and associated intensification of the Site will be supported by a comprehensive package of new and upgraded infrastructure, including water supply, wastewater, stormwater, transport and utility networks. Water supply and wastewater will connect to the IAWAI reticulated networks, with internal reticulation and associated infrastructure, including pump stations, storage, reservoirs and mains where required, provided progressively as development is staged. Stormwater will be managed through an integrated system incorporating on lot retention, primary reticulation, forebays, wetlands, attenuation, flood storage and controlled discharge. Importantly, the staging approach requires each stage to incorporate the infrastructure necessary to manage the runoff generated within that stage without relying on infrastructure to be delivered by future stages.

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	The development will also provide a comprehensive transport network, including collector and local roads, footpaths on all streets, dedicated cycling facilities, shared paths, recreational connections and provision for future public transport services, with connections to the surrounding transport network. The ITA (refer to Appendix 16) concludes that the development can be accommodated within the existing and planned transport network without unacceptable adverse effects on network safety or efficiency, subject to the proposed staging and mitigation measures. Development is proposed to occur in a staged manner, with key transport infrastructure delivered alongside growth, including the requirement that no development beyond approximately 200 dwellings reliant on the Grandview Road connection may occur until the new SH23 access intersection has been constructed and is operational. The ITA also recommends a suite of monitoring, review and mitigation measures to ensure that transport infrastructure continues to operate effectively as development proceeds. Accordingly, the transport infrastructure framework demonstrates that adequate land transport infrastructure will be available to support the subdivision and subsequent development and intensification of the Site
AINF-P26 – Infrastructure location and services (1) Ensure subdivision, use and development are provided with infrastructure and services to a level that is appropriate to its location and intended use including: (a) Three waters (water, wastewater and stormwater management); (b) Telecommunication services; (c) Electricity services; and (d) Adequate water supply within urban areas for firefighting purposes.	The Infrastructure Report (refer to Appendix 13) confirms that the development can be appropriately serviced for three waters and utility infrastructure, with servicing delivered progressively in accordance with the staged development framework. Water supply and wastewater servicing will connect to the IAWAI networks, with Stage 1 able to be serviced from existing networks and subsequent stages supported by progressively delivered infrastructure, including the ultimate wastewater connection to the Western Interceptor and a new 6 million litre water reservoir for the later stages. Stormwater will be managed through an integrated treatment train incorporating on-lot soakage, piped conveyance, artificial wetlands, attenuation and controlled

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	discharge, addressing both water quality and quantity effects. The Infrastructure Report also confirms that WEL Networks and Tuatahi First Fibre can service the development for electricity and telecommunications respectively, with detailed utility designs to be progressed with the network providers. The water network will incorporate hydrants at appropriate locations and has been designed to provide FW2 firefighting supply for residential development and FW3 supply for apartments and commercial areas in accordance with SNZ PAS 4509:2008. Accordingly, the proposed subdivision will be provided with infrastructure and services appropriate to its intended urban use.
Objective AINF-P28 – Stormwater, drainage and flood management (1) Ensure that stormwater and drainage infrastructure for subdivision, land use and development manages adverse effects on the environment, community health, safety, and amenity by: (a) Adopting, where appropriate, a best-practice low impact design approach to the management of stormwater; (b) Managing stormwater in accordance with a drainage hierarchy, with a preference for at-source management; (c) Minimising impervious surfaces to reduce stormwater run-off; (d) Minimising changes to pre-development hydrological conditions by utilising the best practicable option; (e) Avoiding, remedying, or mitigating the adverse effects of: (i) Altering the frequency, volume, or duration of flow of stormwater runoff onto adjacent land or downstream sites; (ii) Altering flood plains, or overland flow paths; or (iii) Reducing flood and stormwater storage capacity on-site;	The Brymer SMP establishes an integrated, best-practice approach to stormwater management based on the WRC stormwater guidelines and RITS. The proposed system follows the relevant drainage hierarchy and incorporates at-source management through on-lot soakage and retention, followed by piped conveyance, forebays and artificial wetlands providing water quality treatment, extended detention, attenuation and flood storage. On-lot soakage reduces runoff entering the downstream network and, where practicable, assists with groundwater recharge. The stormwater system has also been designed to minimise changes from pre-development hydrological conditions and manage potential upstream and downstream effects. Existing flow paths and discharge locations are to be retained, external and upstream catchment inflows have been accounted for, and post-development peak discharges are to be attenuated, including to no more than 80% of pre-development flows for the 100 year ARI event where applicable. Overland flows from larger events will be safely conveyed through road corridors to the proposed artificial wetlands. Flood modelling, including a conservative scenario

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(f) Mitigating upstream and downstream effects (including erosion and scour); (g) Providing a stormwater management plan for future urban development which is consistent with any catchment management plan; (h) Promoting clean water reuse and groundwater recharge where practicable; and (i) (i)Avoiding, remedying or mitigating the generation of contaminants from urban development. (2) Protect the continuing operation of existing regional flood management infrastructure from the adverse effects of other activities. In particular consideration shall be given to: (a) Maintaining and enhancing the operational efficiency, effectiveness, viability and safety of regional flood management infrastructure; (b) Protecting investment in existing regional flood management infrastructure; and (c) Retaining the ability to maintain and upgrade regional flood management infrastructure. (3) Ensure that new regional flood management infrastructure is considered having regard to: (a) The environment as it exists; (b) The duration, timing and frequency of the adverse effect; (c) The impact on other existing regional flood management infrastructure if the new work is not undertaken; (d) The need for the work in the context of the wider network or in the context of the provision of alternative infrastructure; (e) The avoidance, remediation or mitigation of anticipated adverse environmental effects to the extent practicable; (f) The demand for and benefits of new regional flood management infrastructure;	involving blockage of primary stormwater devices, confirms that flood immunity can be maintained, subject to minor detailed design refinements. The proposal also appropriately recognises the existing regional drainage network. Existing drains within the site form part of the WRC Waikato Central–Ohote Basin land drainage system, and the proposed development will provide new public stormwater infrastructure while protecting and enhancing the existing drainage corridors. The treatment train, attenuation requirements and controlled outlet structures will reduce contaminant loads, manage discharge rates and minimise erosion and scour risks to downstream environments. Overall, the proposed stormwater system provides a coordinated approach to water quality, runoff volume, groundwater recharge, flood management and the continued functioning of the wider drainage network and is therefore consistent with the outcomes sought by Policy AINF-P28.

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(g) The route, site, and method selection process; (h) The technical and locational constraints; and (i) The benefits of the regional flood management infrastructure in terms of managing climate change effects. (4) Provision of new regional flood management infrastructure occurs in a planned and coordinated manner which recognises and addresses potential cumulative effects and is based on sufficient information to allow assessment of the potential long-term effects on the environment.	
Objective AINF-O8 – Land transport network An integrated land transport network where: (a) All transport modes are accessible, safe and efficient; and (b) Adverse effects from the construction, maintenance, upgrading and operation of the transport network are avoided, remedied or mitigated; (c) Strategic road and rail corridors play an important role in the district for facilitating the movement of inter and intra-regional freight; and (d) There is an effective and efficient land transport system that enhances economic well-being, and supports growth and productivity within the Waikato region and upper North Island.	The proposal is consistent with Objective AINF-O8 as it provides an integrated transport network that supports safe, efficient and accessible movement for a range of transport modes, while ensuring transport infrastructure is delivered in step with development. The ITA (refer to Appendix 16) concludes that the development can be accommodated within the existing and planned transport network without unacceptable adverse effects on network safety or efficiency, subject to the proposed staging, mitigation and monitoring measures. Key factors supporting consistency with the objective include: • Provision of a connected transport network comprising collector and local roads, footpaths, cycleways, shared paths and bus-capable roads that support walking, cycling, public transport and private vehicle travel. • Delivery of transport infrastructure through a staged framework, including the requirement that development beyond approximately 200 dwellings cannot occur until the SH23 access intersection has been constructed and is operational. • Assessment and mitigation of transport effects through intersection upgrades, travel demand measures, construction traffic management, monitoring and review mechanisms.

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	• Recognition of the strategic function of SH23 as a state highway, freight route, HPMV route and regional transport corridor, with the proposed access designed to maintain its operational role. • Support for planned urban growth by providing transport infrastructure capable of servicing approximately 1,043 dwellings and associated neighbourhood-scale commercial activities while maintaining acceptable network performance. Overall, the proposal supports an effective and efficient land transport system that facilitates growth, accessibility and economic wellbeing while appropriately avoiding, remedying or mitigating adverse transport effects.
AINF-P4 Natural Hazards and Climate Change Improve the resilience of infrastructure to natural hazard risk and climate change disruptions by encouraging the design and location of infrastructure to take account of natural hazards and the effects of climate change.	The design and location of infrastructure has been informed by the natural hazards affecting the Site, including flooding, liquefaction, settlement, expansive soils and slope instability, together with the anticipated effects of climate change. The GIR (refer to Appendix 17) identifies these geotechnical hazards and incorporates appropriate design responses, including foundation design for liquefaction-induced settlement, preloading and consolidation of compressible soils, engineered fill and slope stability requirements. Slope stability has also been assessed under elevated groundwater and seismic conditions, with further detailed design required where appropriate. The stormwater infrastructure has similarly been designed with climate resilience in mind. The SMP (refer to Appendix 14) applies climate change adjusted rainfall assumptions using RCP8.5 for flood sensitivity testing, and the stormwater system provides for attenuation, controlled discharge, flood storage and overland flow conveyance during larger storm events. The Infrastructure Report (refer to Appendix 13) also provides for on lot soakage to help maintain groundwater recharge and reduce peat shrinkage, while the proposed wastewater pump stations include a

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	minimum of nine hours of emergency storage in accordance with RITS, improving resilience during service disruptions. Overall, the infrastructure strategy has taken account of the Site's natural hazard constraints and future climate conditions through its siting, design, servicing and redundancy measures. These measures will reduce the vulnerability of infrastructure to flooding, ground movement and service disruption and support the long-term resilience of the Brymer development.
AINF-P6 - Environmental effects, community health, safety and amenity. Require the development, operation, maintenance, repair, replacement, upgrading and removal of infrastructure and its associated structures to avoid, remedy or mitigate adverse effects on the environment, community health, safety and amenity.	The proposed Brymer development aligns with Policy AINF-P6. The infrastructure required to service the development has been comprehensively planned alongside the masterplan and supported by specialist assessments addressing its potential environmental, health, safety and amenity effects. The proposed water, wastewater and stormwater infrastructure will be progressively delivered as development occurs, with the stormwater system incorporating treatment, attenuation and conveyance measures and integrating with wetlands, watercourses and stormwater reserves. The wider consent framework also provides for the management of earthworks, stormwater discharges, ecological effects, landscaping and other infrastructure-related effects through proposed conditions and management measures. Potential ecological and water-related effects have been specifically assessed. While some modified watercourses will be affected by infrastructure and roading works, the EclA (refer to Appendix 23) identifies the residual effects as low and provides for stream and wetland creation, restoration and enhancement, with the overall outcome for streams and wetlands expected to be net positive. Stormwater infrastructure is also integrated with the wider blue-green network, including

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	retained wetlands, watercourses and open spaces, assisting with both environmental mitigation and amenity outcomes. Infrastructure related noise and construction effects will likewise be managed. The Assessment of Noise Effects (refer to Appendix 27) establishes specific operational noise limits for the proposed wastewater pump stations to protect nearby noise-sensitive activities, while construction noise and vibration will be controlled through applicable standards and the CNVMP. Construction methods also include measures such as water carts for dust suppression, with staged works and associated management plans reducing temporary effects on surrounding residents. Overall, the proposed infrastructure has been designed and located with appropriate measures to avoid, remedy or mitigate adverse effects on ecological values, water quality, landscape and visual amenity, noise, dust, community health and safety. The specialist assessments and proposed consent conditions provide an appropriate framework for managing these effects during both construction and operation, consistent with Policy AINF-P6.
AINF-P27 – Land transport network (1) Avoid, remedy or mitigate effects of subdivision, use and development that would compromise: (a) The road function, as specified in the road hierarchy; (b) The access by emergency services and their vehicles; or (c) The safety and efficiency, including the maintenance, upgrading, development and operation of the land transport network. (2) Minimise reverse sensitivity effects on the land transport network and effects on indoor amenity and health for sensitive land uses established in proximity to existing transport corridors by mapping potentially affected areas and introducing design controls.	The proposal is consistent with AINF-P27 as the transport effects of the subdivision and associated development have been comprehensively assessed through the ITA (refer to Appendix 16), which concludes that the development can be accommodated within the existing and planned transport network without unacceptable adverse effects on network safety or efficiency. The proposal includes a connected hierarchy of collector and local roads, integrated walking and cycling infrastructure, and multiple access points that connect appropriately with the surrounding transport network. The staged delivery of transport infrastructure, including the SH23 access trigger, ensures that network capacity is provided in step

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	with development and that the operation of the network is not compromised. In particular, the proposal: • Directs development traffic to roads intended to accommodate it, including Grandview Road, Brymer Road and SH23, thereby maintaining the function of the surrounding road hierarchy. • Maintains acceptable levels of service across the local and wider transport network, with all site access intersections operating at acceptable levels throughout the assessment period. • Provides a road network that accommodates emergency service access and vehicle movements, with road geometry and access arrangements designed to accommodate emergency vehicles and other service vehicles. • Avoids, remedies or mitigates operational and construction-related transport effects through a suite of recommended measures, including staged infrastructure delivery, safe system audits, construction traffic management plans, monitoring and review requirements, and upgrades to transport infrastructure where required. In relation to reverse sensitivity, the proposal does not introduce sensitive activities in close proximity to strategic transport corridors in a manner that would compromise the operation of the transport network. The design of the development, including the internal road layout, access arrangements and staging framework, recognises the strategic function of SH23 as a state highway and freight corridor. As such, the proposal will not adversely affect the maintenance, operation or future upgrading of the surrounding transport network and is therefore consistent with AINF-P27.

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AINF-P29 - Construction, maintenance, upgrading and operation of the land transport network. (1) Provide for the construction, maintenance, upgrading and operation of an efficient, effective, integrated, safe, resilient, accessible and sustainable transport network through: (a) Corridor, carriageway and intersection design which is appropriate to the road function as specified in the road hierarchy and in accordance with relevant guidelines; (b) The appropriate design and location of sites' accesses; (c) Traffic signage, road marking, lighting, rest areas and parking as appropriate; (d) Safe and accessible provision for pedestrians and cyclists to maximise accessibility, including off-road facilities and connections; (e) Corridor and carriageway design which enables provision of public transport; (f) Provision for other infrastructure, including where suitable low impact design stormwater facilities; (g) Provision for stock underpasses where suitable access is not readily available; (h) Discouraging the installation of new at grade road and pedestrian rail level crossings; (i) Controlling the location of buildings and other visual obstructions within the sightline areas of rail level crossings; and (j) Railway crossing design in accordance with the requirements of the rail operator.	The proposal is consistent with AINF-P29 as it provides for the development of an efficient, integrated, safe and accessible transport network that has been designed having regard to the surrounding road hierarchy, future growth requirements and all transport modes. The ITA (refer to Appendix 16) confirms that the development incorporates an internal network of collector and local roads, footpaths, cycleways, shared paths, public transport-ready corridors and appropriately designed access connections to Grandview Road, Harrogate Place, O'Brien Road and SH23. Road layouts, cross-sections and intersections have been designed to accommodate their intended function, including future bus services, emergency vehicles, freight movements and active transport users. Key features demonstrating consistency with this policy include: • The road hierarchy comprises collector roads, local roads and rear lanes designed to meet applicable transport corridor and road design standards and to connect efficiently with the wider transport network. • The location and design of site accesses, including the new SH23 access and Grandview Road connection, have been assessed through detailed transport modelling and are supported by a staged delivery framework. • The development provides footpaths on all streets, bi-directional cycleways and shared paths on collector roads, and multiple pedestrian and cycle connections to surrounding neighbourhoods and reserves, supporting safe and accessible movement for active modes. • Collector roads are designed with bus-capable geometry and provision for future bus stop infrastructure, enabling future public transport services to be extended into the development as demand grows.

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(k) Protection and promotion of the development of the regional rail network for the transportation of freight; and (l) Development of efficient processes and freight routes for the movement of high productivity motor vehicles through the region	- Transport infrastructure is integrated with the wider subdivision design, including stormwater infrastructure, open space networks and utility services. - The proposed SH23 intersection has been designed recognising the strategic role of SH23 as a State Highway, High Productivity Motor Vehicle (HPMV) route and freight corridor, ensuring its ongoing function for regional freight movements is maintained. The ITA further concludes that transport effects associated with the construction and operation of the development can be appropriately managed through recommended conditions, including staged infrastructure delivery, safe system audits, construction traffic management plans, monitoring requirements, and intersection upgrades where required. Accordingly, the proposal provides for the construction, maintenance and operation of an efficient, safe and sustainable transport network and supports the continued operation of strategic freight routes within the Waikato region
Policy AINF-P34 – Vehicle access Control the location of new vehicle accesses relative to other accesses, intersections and rail level crossings to maintain and improve the safety and efficiency of the land transport network.	The proposal is consistent with Policy AINF-P34 as the location, design and staging of vehicle access points have been comprehensively assessed through the ITA (refer to Appendix 16) to ensure the safe and efficient operation of the surrounding transport network. The development provides four access points, comprising limited access via O'Brien Road and Harrogate Place, a connection to Grandview Road, and a new principal access to SH23. These accesses have been strategically located to distribute traffic appropriately across the transport network, minimise adverse effects on surrounding roads, and direct development traffic to roads intended to accommodate growth. The proposed access arrangements have been tested through detailed WRTM and SIDRA modelling, which demonstrates that the surrounding network and key intersections will continue to operate at acceptable levels of service as development

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	progresses. Importantly, the staged access framework ensures that development growth occurs in line with available transport capacity, including a requirement that development beyond approximately 200 dwellings reliant on the Grandview Road connection cannot proceed until the SH23 access intersection has been constructed and is operational. The proposed SH23 access has also been designed as a protected intersection and will require NZTA approval, ensuring it integrates appropriately with the state highway network and maintains the safety and efficiency of this strategic transport corridor. Accordingly, the proposal maintains and, in some respects, improves the operation of the land transport network and is therefore consistent with Policy AINF-P34.
Policy AINF-P35 – Land transport network infrastructure (1) Ensure that land transport network infrastructure is developed so that: (a) The design, location, alignment and dimensions of new land transport networks provide safe vehicle, pedestrian and cycling access and manoeuvring to every site; (b) The land transport network provides good connectivity to the site and integrates with adjacent developments and identified as future growth areas including walking and cycling networks and facilities and public transport; (c) There is adequate provision of on-site parking and manoeuvring for land use activities; (d) Contaminants generated during construction are appropriately mitigated; and (e) Design, alignment and dimension of new roads will accommodate the installation of network infrastructure in accordance with technical and safety specifications.	The proposal is consistent with Policy AINF-P35 as it provides a comprehensively planned transport network that has been specifically designed to accommodate safe and efficient vehicle, pedestrian and cycling movements throughout the development and between the site and surrounding neighbourhoods. The proposed road hierarchy comprises collector roads, local roads and rear lanes, with all internal streets providing footpaths and the collector network incorporating bi-directional cycleways and shared paths. The ITA (refer to Appendix 16) concludes that the development will provide a legible, connected and accessible transport network that integrates effectively with adjacent residential areas, reserves and the wider transport system. The proposal also promotes strong connectivity by providing multiple connections to Grandview Road, SH23, Harrogate Place and O'Brien Road, together with pedestrian and cycle links to surrounding neighbourhoods and reserve networks. Collector roads have been designed with bus-capable geometry and provision for future public transport infrastructure, enabling future public transport services to be extended into the development as demand grows. The ITA confirms that the

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	network has been designed to support walking, cycling, public transport and private vehicle travel while integrating with the wider planned growth of the Rotokauri area. Adequate provision is also made for parking, manoeuvring and servicing requirements within the development. The transport assessment confirms that roads, intersections and access arrangements have been designed to accommodate service vehicles, waste collection vehicles, freight vehicles and emergency services, while commercial and residential areas include on-site parking and servicing facilities appropriate to their intended activities. Construction-related effects will be managed through Construction Traffic Management Plans and associated erosion, sediment and construction management measures, while the road corridor design has been developed alongside the wider infrastructure strategy to accommodate stormwater, water supply, wastewater and other network utilities in accordance with relevant technical standards. Accordingly, the proposal is consistent with Policy AINF-P35.
Hazards and Risks	
CL – Contaminated Land	
CL-O1 – Contaminated Land. The subdivision, use and development of contaminated land is managed to prevent, as far as possible, and, in any event reduce to acceptable levels, the risks to human health and safety and the environment.	The DSI (refer to Appendix 21) has identified localised areas of contaminated land associated with historic activities on the Site. In particular, shallow soil contamination has been identified around the cottage and stockyard areas, including elevated lead, asbestos and arsenic concentrations. These affected areas are localised, and the DSI confirms that soils across the remainder of the Site are suitable to remain on-site. The identified contaminated areas will be appropriately managed and remediated as part of the development. Approximately 1,850 m³ of soil within the identified areas is expected to require disturbance and off-site disposal, with the works requiring consent as a restricted discretionary activity under the NESCS. A RAP-

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	CSMP (refer to Appendix 22) has been prepared to establish controls for the safe handling, management and disposal of contaminated soils and to address any unexpected contamination encountered during development. The RAP-CSMP includes controls to minimise exposure to contaminated soil and dust during earthworks, including controlled site access, appropriate PPE, dust controls, earthworks management and procedures for unexpected discoveries. Where groundwater is encountered during contaminated soil works, a suitably qualified and experienced practitioner will determine whether further management measures are required. Accordingly, the identified contamination does not preclude the proposed residential use of the Site and can be appropriately remediated and managed so that risks to human health, safety and the environment are reduced to acceptable levels, consistent with Objective CL-O1.
CL-P1 – Managing the use of contaminated land. (1) Contaminated land is managed (which may include remediation) to ensure that contaminants are at a level acceptable for the proposed land use. (2) Disposal of contaminated soil is carried out in a manner that avoids adverse effects on human health and safety or on the environment. (3) Use or development of contaminated land does not damage or destroy any contaminant containment works, unless comparable or better containment is provided, or monitoring demonstrates that the containment is no longer required. (4) Ensure that contaminated land management approaches associated with the use, subdivision and development of actual or potentially contaminated land includes, to the extent necessary:	A DSI (refer to Appendix 21) has been undertaken prior to subdivision and development of the Site and has identified localised areas of contamination associated with the cottage and Stockyards 1–3. These areas contain elevated concentrations of lead, asbestos and/or arsenic and require appropriate remediation or management, while soils across the remainder of the Site are considered suitable to remain on-site. A RAP-CSMP (refer to Appendix 22) has been prepared to establish how contaminated soils will be safely managed during development. The RAP-CSMP requires remediation of the identified areas so that contaminant concentrations remaining in situ are suitable for the proposed residential land use. This includes excavation of affected soils, validation sampling by a suitably qualified and experienced practitioner and comparison against the relevant residential soil contaminant standards. Contaminated soils removed from the Site are required to be disposed of at a suitably licensed facility authorised to receive material with the

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(m) Site investigations being undertaken prior to any new subdivision or change of land use that could result in an increase in any adverse effects of land contamination; (n) Remedial action plans; (o) Site validation reports; and (p) Site management plans as appropriate for identifying, monitoring and managing contaminated land. (5) All site investigation reports, remedial action plans, site validation reports and ongoing site management plans are prepared in accordance with the Ministry for the Environment's Contaminated Land Management Guidelines #1 and #5, and are provided to both Waikato District Council and Waikato Regional Council for their records.	contaminant concentrations identified in the DSI, thereby managing potential effects on human health and the environment. The reporting and validation framework also responds directly to CL-P1(4). Following remediation, a Site Validation Report will be prepared in accordance with Ministry for the Environment Contaminated Land Management Guideline No. 1 and lodged with Waikato District Council, with all reporting certified by a suitably qualified and experienced practitioner. The DSI also records the requirement for the DSI and remedial action plan to be provided prior to remediation and for the Site Validation Report and any ongoing monitoring and management plan to be provided following remediation. There are no existing contaminant containment works identified that would be damaged or removed by the proposal, such that CL-P1(3) is not directly engaged. Overall, the investigation, remediation, soil disposal, site management and validation measures provide an appropriate framework to ensure that contaminated land is made suitable for its intended residential use and that risks to human health and the environment are appropriately managed, consistent with Policy CL-P1.
NH – Natural Hazards and climate change	
NH-O2 – Areas at risk from natural hazards. Subdivision, use and development within areas at risk from natural hazards are managed so that natural hazard risks on people, property and infrastructure are avoided, remedied or mitigated.	The proposed Brymer development is considered to be consistent with Objective NH-O2. The natural hazards relevant to the Site have been investigated through the GIR, GEMP, hydrogeological assessment and stormwater modelling (refer to Appendices 17, 18, 20 and 14), with the findings directly informing the proposed landform, infrastructure and servicing response. The key geotechnical hazards include liquefaction and associated settlement, compressible and expansive soils, shallow groundwater and localised slope instability. These risks are to be managed through measures including foundation design, preloading and consolidation,

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	engineered fill, groundwater management, slope design and further detailed assessment where required. Flooding and overland flow risks have also been specifically assessed. The SMP includes modelling of existing and post development flooding, overland flow paths and the 100 year event, with the stormwater system designed to provide attenuation, flood storage and safe conveyance of larger storm events through the proposed wetland and drainage network. The associated infrastructure and earthworks design also responds to the Site's shallow groundwater conditions, while the GEMP provides for ongoing groundwater and settlement monitoring and management during construction. Overall, the proposal adopts a risk-based response to the natural hazards affecting different parts of the Site. The identified hazards do not preclude development but require site-specific engineering, stormwater and monitoring measures to ensure risks to future residents, neighbouring properties and infrastructure are appropriately avoided or mitigated. Subject to implementation of the recommendations and management measures contained in the specialist assessments, the proposal is therefore considered consistent with Objective NH-O2.
NH-O4 – Climate Change. Communities are well-prepared to adapt to the effects of climate change.	The proposed Brymer development aligns with NH-O4. Climate change has been expressly incorporated into the design of the development, particularly through climate change adjusted rainfall and flood modelling and an integrated stormwater system providing attenuation, flood storage and safe conveyance of larger storm events. The development also incorporates a substantial blue-green network of wetlands, watercourses and open spaces that supports longer-term resilience to changing hydrological conditions. Accordingly, Brymer has been planned to

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	accommodate and adapt to the anticipated effects of climate change, consistent with Objective NH-O4.
NH-P6 – Existing infrastructure and utilities in all areas subject to natural hazards. Provide for the operation, maintenance, minor upgrading, and upgrading of existing infrastructure and utilities, including ancillary activities, and site rehabilitation, in all areas subject to natural hazards.	Policy NH-P6 is principally enabling in nature and relates to the continued operation, maintenance and upgrading of existing infrastructure and utilities in areas subject to natural hazards. The Brymer development primarily involves the establishment of new infrastructure to service the proposed urban development and therefore the policy has limited direct application. However, where the proposal interfaces with or requires works associated with existing infrastructure and utility networks, those assets will remain capable of being operated, maintained and upgraded. Accordingly, the proposal does not conflict with the enabling intent of Policy NH-P6.
NH-P7 – Managing natural hazard risk generally (1) Outside of high risk natural hazard areas, provide for subdivision, use and development where: (a) Natural hazard risk has been appropriately identified and assessed; (b) The risk can be adequately avoided, remedied or mitigated; (c) The risk does not transfer to adjoining sites; and (d) The risk is not exacerbated.	The proposed Brymer development is considered consistent with Policy NH-P7. Natural hazard risks have been appropriately identified and assessed through the specialist investigations undertaken for the Project, including the GIR, GEMP, Stormwater Management Plan and Infrastructure Report. These assessments identify the principal hazards relevant to the Site as including flooding and overland flow, shallow groundwater and peat-related settlement, liquefaction susceptibility and localised slope instability. The proposed development incorporates a range of engineering and design measures to avoid or mitigate these risks, including appropriate earthworks and ground improvement, management of groundwater and settlement, slope stability measures, stormwater attenuation and conveyance, and the retention and management of overland flow paths. In relation to flooding, while parts of the Site comprise low-lying land affected by existing flood hazard and overland flow, the Site is located immediately upstream of the existing downstream floodplain associated with the Ohote Basin Drainage Scheme. The proposed stormwater system has been informed by detailed hydraulic modelling and is designed to manage runoff and flood flows so that development

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	does not exacerbate existing downstream flooding or transfer additional flood risk to neighbouring properties. Groundwater recharge measures are also proposed within the low-lying peat areas to assist in maintaining groundwater conditions and reducing the potential for peat dewatering, shrinkage and associated settlement. Accordingly, the relevant natural hazards have been identified and incorporated into the design of the development, with appropriate mitigation and further detailed design and monitoring provided where necessary. On this basis, the proposal is not anticipated to exacerbate natural hazard risk or transfer material additional risk to adjoining sites and is considered consistent with Policy NH-P7.
NH-P15 - Managing flood hazards through integrated catchment management. (1)Manage flood hazards by requiring new subdivision and development within floodplains, flood ponding areas and overland flow paths to adopt integrated catchment plan-based management methods which: (a) Maintain the function of natural floodplains, wetlands and ponding areas including flood storage capacity; and (b) Retain the function and capacity of overland flow paths to convey stormwater run-off without resulting in increased scour and erosion; and (c) Do not transfer or increase risk elsewhere within the catchment; and (d) Promote best practice stormwater management with reference to the Waikato Stormwater Management Guideline and the Regional Infrastructure Technical Specifications (RITS); and (e) Minimise impervious surfaces.	While parts of the Site comprise low-lying land affected by existing flood hazard and overland flow, the stormwater response has been developed on an integrated catchment basis through the SMP (refer to Appendix 14) and supporting hydraulic modelling. The proposed system retains and enhances the principal drainage corridors and wetlands and incorporates constructed wetlands providing attenuation and flood storage, thereby maintaining appropriate flood storage and conveyance functions within the Site. Existing overland flow paths and discharge locations are generally retained within the proposed drainage network, with larger storm events safely conveyed through designated overland flow paths, wetlands and watercourses. The stormwater system limits post development peak discharges to no more than 80% of pre-development flows for the relevant design events, while hydraulic modelling has considered both the Site and upstream catchment inflows to demonstrate that the development will not exacerbate flooding or transfer additional flood risk downstream. Appropriate outlet design and erosion protection measures will also manage potential scour and erosion.

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	The stormwater strategy has been developed in accordance with the Waikato Stormwater Management Guideline and RITS and adopts a treatment-train approach incorporating at-source soakage and retention, treatment, attenuation and controlled discharge. While urbanisation will necessarily increase impervious surfaces, on lot soakage and the extensive blue-green network of wetlands, watercourses and open spaces assist in reducing and managing runoff and maintaining groundwater recharge. Accordingly, the proposal adopts an integrated catchment-based approach that maintains key flood management functions and avoids increasing flood risk elsewhere, consistent with Policy NH-P15.
NH-P19 - Development on land subject to instability or subsidence. Avoid locating new subdivision, use and development, including rezoning, on land assessed as being subject to, or likely to be subject to, instability or subsidence, unless appropriate mitigation is provided and the activity does not increase the risk to people, property or infrastructure.	The GIR (refer to Appendix 17) identifies areas of the Site that are susceptible to instability or subsidence related effects, principally associated with compressible peat and soft soils in the low-lying areas, load-induced settlement, liquefaction and localised slope instability. In particular, the assessment identifies potentially significant consolidation settlement within the compressible soils and confirms that specific ground improvement measures are required before development occurs. These constraints have been incorporated into the proposed engineering response. Ground improvement will include temporary surcharge/preloading to consolidate compressible soils before construction, thereby limiting post-construction settlement affecting buildings and infrastructure. Alternative measures, including piled solutions or excavation and replacement with engineered fill, are available where required. The concept surcharge assessment confirms that settlement of the peat can be appropriately mitigated through the proposed methodology. Liquefaction-induced settlement and reduced bearing capacity will be addressed through specific foundation design, while slope instability will be managed through appropriate batter slopes and, where necessary, reinforcement or retaining structures.

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	The GEMP (refer to Appendix 18) provides an additional monitoring and management framework for groundwater drawdown and settlement during construction, including review of cumulative and differential settlement effects and updating of mitigation where monitoring identifies the need for further action. Accordingly, while parts of the Site are subject to identified instability and subsidence constraints, the specialist investigations demonstrate that these risks can be appropriately mitigated through ground improvement, engineering design and monitoring so that development does not result in unacceptable risks to people, property or infrastructure. The proposal is therefore consistent with Policy NH-P19.
NH-P21 - Stormwater management in areas subject to risk of land instability or subsidence. (1) Avoid discharge of stormwater directly to ground on land that is potentially at risk of land instability or subsidence unless: (a) An assessment has been undertaken by an appropriately qualified geotechnical specialist, indicating that the site is suitable for the proposed discharges; and (b) Any adverse effects on the site and receiving environment can be appropriately mitigated.	The proposed Brymer development is considered consistent with Policy NH-P21. Parts of the Site contain deep compressible peat and soft soils and are therefore susceptible to settlement and subsidence effects. These ground conditions, together with the Site's shallow groundwater regime, have been specifically investigated through the GIR and hydrogeological assessment and have informed the proposed stormwater management approach. The hydrogeological assessment confirms that groundwater conditions in the low-lying areas are characterised by shallow groundwater within the peat and silts and considers the interaction between the proposed stormwater infrastructure, groundwater and potential ground settlement. The SMP (refer to Appendix 14) proposes stormwater soakage where practicable to replenish groundwater and reduce runoff volumes, rather than relying on unrestricted discharge to ground across the Site. This forms part of a wider treatment-train approach incorporating retention, treatment, attenuation and controlled discharge. Importantly, the potential for groundwater changes to cause settlement has been specifically considered by the geotechnical and hydrogeological specialists, with the proposed preloading of peat and associated groundwater and settlement management measures intended to maintain stable

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	ground conditions. The assessments conclude that the proposed development is not expected to materially alter the overall groundwater flow regime or result in a measurable long-term change to the catchment water balance. Accordingly, any stormwater discharge to ground will occur only where demonstrated to be practicable and appropriate having regard to the Site's geotechnical and groundwater conditions, with detailed design and monitoring providing further safeguards against settlement or instability effects. On this basis, adverse effects on the Site and receiving environment can be appropriately mitigated, consistent with Policy NH-P21.
NH-P22 - Liquefaction susceptible land risk assessment. (1) On land assessed as potentially susceptible to liquefaction, ensure that: (a) An assessment by a geotechnical specialist occurs before new subdivision, use or development takes place; and (b) The level of assessment reflects the type and scale of the subdivision, use or development and the overall vulnerability of the activity to the effects of liquefaction; and (c) The assessment confirms that the land is suitable for the proposed development.	The proposed Brymer development is considered consistent with Policy NH-P22. A detailed geotechnical investigation has been undertaken by CMW Geosciences to identify and assess the geotechnical hazards affecting the Site, including liquefaction susceptibility. The GIR (refer to Appendix 17) identifies liquefaction as a potential hazard across the Site and assesses the associated risk of liquefaction-induced settlement and reduced bearing capacity. The assessment is commensurate with the scale and nature of the proposed development and specifically considers the implications for future residential development and infrastructure. The GIR concludes that the identified liquefaction risk can be appropriately addressed through engineering design, including designing building foundations to accommodate liquefaction-induced settlement and reduced bearing capacity. Accordingly, while the Site has areas susceptible to liquefaction, the specialist assessment demonstrates that this does not preclude development and that the associated risks can be appropriately managed through detailed geotechnical and foundation design. Subject to implementation of the GIR recommendations, the

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	land is considered suitable for the proposed development and the proposal is therefore consistent with Policy NH-P22.
NH-P26 - Effects of climate change on new subdivision and development. (1) Ensure that adequate allowances are made for the projected effects of climate change in the design and location of new subdivision and development including new urban zoning throughout the District, including undertaking assessments where relevant that provide for: (a) The projected increase in rainfall intensity, as determined by national guidance, assuming a temperature increase of not less than 2.3°C by 2120; (b) The projected increase in sea level, where relevant, as determined by national guidance and the best available information, but being not less than 1m by 2120; (c) In respect to new urban zoning, stress testing under the RCP 8.5 scenario for rainfall¹ and RCP 8.5H+ for sea level rise²; (d) In respect to the coastal environment, increases in storm surge, waves and wind; and (e) The ability for natural systems to respond and adapt to the projected changes included in (a) to (d) above.	The proposed Brymer development is considered consistent with Policy NH-P26. Climate change has been expressly incorporated into the stormwater and flood assessment for the development. The SMP (refer to Appendix 14) uses NIWA climate-change-adjusted rainfall and adopts the RCP8.5 scenario for the 2100–2120 period, including assessment of the 2, 10 and 100 year rainfall events. This is a conservative approach, with the modelling adopting climate change assumptions of approximately 4°C, exceeding the minimum 2.3°C temperature increase referenced in the policy. The hydraulic modelling assesses both existing and post-development conditions and incorporates the wider downstream Ohote Basin Drainage Scheme and Waipā River boundary conditions. The proposed stormwater system incorporates on-lot retention, constructed wetlands, attenuation storage, controlled outlets and overland flow paths, with modelling demonstrating substantial attenuation of post-development runoff under climate change adjusted conditions. Retained and enhanced wetlands, streams and drainage corridors also provide a blue-green framework that assists natural hydrological systems to continue functioning as conditions change. Given Brymer's inland location, the sea-level rise and coastal storm surge, wave and wind matters in NH-P26(1)(b), (c) and (d) are not relevant to the Site. Overall, the proposal has appropriately allowed for projected increases in rainfall associated with climate change and has been stress-tested using the RCP8.5 scenario sought by the policy. Accordingly, Brymer is considered consistent with Policy NH-P26.

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NH-P28 - Precautionary approach for dealing with uncertainty. In areas throughout the district likely to be affected by climate change over the next 100 years, adopt a precautionary approach towards new subdivision, use and development which may have potentially significant or irreversible adverse effects, but for which there is incomplete or uncertain information.	The proposed Brymer development is considered consistent with Policy NH-P28. The potential effects of climate change have been addressed through a precautionary approach to the assessment and design of the development, particularly in relation to increased rainfall and flood risk. The SMP (refer to Appendix 14) adopts climate change adjusted rainfall based on the RCP8.5 scenario for 2100–2120, including assessment of the 2 , 10 and 100 year events, and applies climate change assumptions of approximately 4°C. This provides a conservative basis for assessing future flood conditions and exceeds the minimum climate change allowance anticipated by the District Plan. The stormwater and flood-management system also incorporates resilience to uncertainty through wetlands and attenuation storage, controlled outlets, overland flow paths and hydraulic modelling of both existing and post-development conditions. The modelling demonstrates substantial attenuation of post-development runoff under climate change adjusted conditions, with post-development discharge rates generally below the adopted design targets and additional capacity available within the stormwater system. Accordingly, rather than relying on a single present-day design scenario, Brymer has been assessed against conservative future climate conditions and incorporates capacity and resilience within its stormwater system to respond to uncertainty. This represents an appropriately precautionary approach to climate-change-related risk and is consistent with Policy NH-P28.
NH-P30 - Assess the impact of climate change on the level of natural hazard risks. (1)For all new subdivision, use and development requiring rezoning or a resource consent, ensure that account is taken of the projected effects of climate change over the next 100 years when assessing any identified risks	The proposed Brymer development is considered consistent with Policy NH-P30. The specialist assessments have considered the interaction between climate change and the natural hazards relevant to the Site, particularly flooding and stormwater-related risks. As outlined in relation to Policy NH-P26, the SMP (refer to Appendix 14) adopts NIWA climate-change-adjusted rainfall based on the RCP8.5 scenario for

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from natural hazards, and their effects on people, property, infrastructure and the environment. (2) Ensure that, when assessing the effects of climate change on the level of natural hazard risk in accordance with Policy NH-P30(1) above, the allowances in Policy NH-26(1)(a)-(d) are applied. (3) Where the assessment required by Policy NH-P30(1) indicates that natural hazards are likely to be exacerbated by climate change, ensure that subdivision and development are designed and located so that any increased and cumulative risk from natural hazards is managed to acceptable levels and any intolerable risks are avoided or reduced to tolerable or acceptable levels.	2100–2120, including assessment of the 2, 10 and 100 year events and an approximately 4°C climate change allowance. This provides a suitably conservative assessment of flood risk over the timeframe contemplated by the policy. The resulting hydraulic modelling has informed the design and location of development and infrastructure, including constructed wetlands, attenuation storage, controlled outlets and overland flow paths. The modelling considers both existing and post-development conditions, together with the downstream Ohote Basin Drainage Scheme and climate-change-adjusted Waipā River levels, thereby accounting for potential cumulative and downstream flood effects. Accordingly, where climate change has the potential to exacerbate flood hazards, those increased risks have been incorporated into the design of the development and stormwater system so that risks to people, property, infrastructure and the receiving environment are appropriately managed. Sea-level rise and coastal hazards are not relevant given Brymer's inland location. Overall, the proposal has appropriately accounted for climate change when assessing and responding to natural hazard risk and is considered consistent with Policy NH-P30.
Subdivision	
SUB-O1 - Subdivision Subdivision layout and design promotes the land use outcomes sought for the residential, business, industrial, open space and special purpose zones.	The proposed Brymer development is considered consistent with and supportive of Objective SD-O1, as the subdivision layout has been comprehensively designed to establish the underlying land-use pattern for the future residential neighbourhood. The UDA (refer to Appendix 10) confirms that the masterplan and subdivision scheme establish the overall urban structure, including the block and road layout, lot locations and dimensions, access arrangements, relationships with open space and the distribution of residential typologies. These elements are supported by

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	Residential Core Controls and Design Guidelines that will guide the subsequent development of individual lots and their relationship with streets and public spaces. The subdivision provides for a range of residential densities and housing typologies, with their distribution responding to the movement network, neighbourhood centre, open spaces, topography and surrounding interfaces. The two mixed-use commercial sites are integrated with higher-density housing and public open space to establish a neighbourhood focal point, while the subdivision also provides an interconnected street, walking and cycling network and an integrated blue-green network of wetlands, watercourses, stormwater areas and reserves. The LVA (refer to Appendix 12) similarly confirms that the commercial areas, public parks, recreation and stormwater reserves, blue-green network and movement hierarchy are integrated components of the masterplan. Accordingly, the subdivision is not simply a division of land into residential lots; it establishes a coordinated framework for residential, commercial and open-space activities, movement and infrastructure, enabling the intended land-use outcomes to be delivered as an integrated neighbourhood. On this basis, Brymer is considered to directly support Objective SD-O1.
SUB-P1 - Subdivision location and design (1) Ensure subdivision, is located and designed to: (f) Be sympathetic to the natural and physical qualities and characteristics of the surrounding environment; (g) Establish boundaries that minimises, to the extent practicable, buildings and structures dominating adjoining land or public places, the coast, or fresh waterbodies; (h) Arrange allotments to promote view sharing;	The proposed Brymer subdivision is considered generally consistent with Policy SUB-P1, as the layout has been comprehensively designed in response to the Site's physical characteristics, surrounding environment, movement network and intended residential, commercial and open-space outcomes. • SUB-P1(1)(a) – Natural and physical qualities: The subdivision responds to the Site's landform, wetlands, watercourses and surrounding interfaces through the distribution of housing densities, open space and the blue-green network. The LVA (refer to Appendix 12) identifies the public parks, recreation and

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(i) Promote safe communities through quality urban design; (j) Accommodate safe and stable building platforms and vehicle accesses; and (k) Promote consistent grid layout.	stormwater reserves, wetland enhancement and riparian and buffer planting as the primary organising landscape structure for the development. • SUB-P1(1)(b) and (c) – Dominance and view sharing: Higher-intensity apartment, commercial and terrace development is concentrated internally, away from the more sensitive Site edges, with intervening lower-intensity housing, open space and planting assisting to moderate built-form prominence. The Residential Design Guidelines (refer to Appendix 9) also manage building bulk, outlook, setbacks, landscaping and frontage treatment, supporting reasonable outlook and reducing visual dominance. • SUB-P1(1)(d) – Safe communities: The UDA (refer to Appendix 10) supports a connected and legible subdivision structure with dwellings addressing streets and public spaces, strong pedestrian connections and an integrated open-space network. Terrace typologies with rear-loaded access also provide opportunities for continuous street frontages and reduced garage dominance, supporting pedestrian safety and passive surveillance. • SUB-P1(1)(e) – Safe and stable building platforms and accesses: The GIR (refer to Appendix 17) confirms that suitable building platforms can be established through engineered earthworks, ground improvement and appropriate foundation and retaining design. Earthworks are to be undertaken in accordance with NZS 4431 and under Chartered Geo-professional oversight, with specific measures addressing settlement and slope stability. Vehicle accesses and the road network have likewise been designed to provide safe and efficient connections and respond to topography and visibility constraints. • SUB-P1(1)(f) – Grid layout: The subdivision establishes a generally interconnected grid-based street structure, modified where necessary to respond to topography, water features and other Site constraints. This

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	promotes legibility, connectivity and multiple movement choices rather than relying on extensive isolated cul-de-sac development. Overall, Brymer demonstrates a coordinated subdivision response that balances urban connectivity and legibility with the Site's landform, environmental features, geotechnical constraints and surrounding interfaces, and is therefore considered generally consistent with Policy SUB-P1.
SUB-P2 - Residential Subdivision (1) Promote residential subdivision and development that: (l) Integrates staging to ensure multi-modal connectivity; (m) Limits the number and length of cul-de-sacs; (n) Ensures pedestrian access is consistent with the Crime Prevention through Environmental Design (CPTED) principles (o) Discourages the creation of rear lots; (p) Includes adequate lighting levels in publicly accessible spaces; (q) Reflects local characteristics; (r) Lots are orientated in a way that: (i) Maximizes solar access (ii) Addresses the street frontage and public places. (s) Creates lots that can accommodate a variety of density with a mix of usable lot types; and (t) Designs infrastructure to manage stormwater in a sustainable manner by:	The proposed Brymer development is considered generally consistent with Policy SUB-P2, as the subdivision has been designed as a connected, staged and comprehensively planned residential neighbourhood, with the layout responding to transport, urban design, housing, landscape and stormwater considerations. SUB-P2(1)(a) and (b) – Staging, connectivity and cul-de-sacs: The development will be delivered progressively through 12 stages (refer to Appendix 5), with the movement network established alongside each stage. The UDA (refer to Appendix 10) confirms that the street network is designed as a connected hierarchy rather than a series of disconnected cul-de-sacs, providing multiple movement directions and connections between residential areas, the neighbourhood centre, open spaces and external access points. Walking and cycling are provided through public-road footpaths/shared paths and additional open-space and mid-block connections. SUB-P2(1)(c), (e) and (g) – CPTED, lighting and orientation: The UDA (refer to Appendix 10) confirms that streets, pedestrian accessways and open-space edges are designed to achieve clear sightlines, passive surveillance and legible public-private interfaces. Dwellings are encouraged to address streets and public spaces through visible entrances and habitable-room windows, while JOALs incorporate lighting and controlled landscaping and fencing. Housing typologies have also been selected and arranged to respond to orientation and topography, including

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(i) Minimising environmental impacts and maintenance costs, and reducing stormwater discharging to existing reticulated networks and downstream sites; and (ii) Promoting and maintaining riparian margins.	providing opportunities to maximise northern sunlight to living areas and outdoor spaces. SUB-P2(1)(d), (f) and (h) – Lot pattern and housing choice: While the proposal includes JOALs and rear access for some compact housing typologies, these are subordinate access arrangements and are not relied upon as substitutes for the public street network. The subdivision provides a broad range of lot sizes and dwelling types, including apartments, terraces, duplexes and detached dwellings. The lot pattern and density distribution respond to topography, access, open space and surrounding urban and rural interfaces, creating a varied but coherent neighbourhood that reflects the Site’s particular characteristics. SUB-P2(1)(i) – Sustainable stormwater management: The Infrastructure Report (refer to Appendix 13) confirms that stormwater is managed through an integrated system of on-lot retention/soakage, piped networks, modified drainage channels and constructed wetlands. The system seeks to preserve existing flow paths, manage peak discharges to no more than 80% of pre-development flows where applicable, and avoid worsening downstream effects. Wetlands provide water-quality treatment, extended detention and attenuation for events up to the 100-year storm, including climate change. Riparian planting is also incorporated alongside relevant drainage and watercourse areas. Overall, the subdivision establishes a connected, safe and varied residential environment, supported by active-mode connections, CPTED principles, a range of usable lot types and an integrated water-sensitive stormwater network. Accordingly, Brymer is considered generally consistent with Policy SUB-P2.
SUB-P3 - Lot Sizes	The proposed Brymer development is considered generally consistent with Policy SUB-P3, as the subdivision provides a deliberate range of lot sizes and dimensions

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(1) Minimum lot size and dimension of lots enable the achievement of the character and density outcomes of each zone; and (2) Prevent undersized lots in the SETZ - Settlement zone and LLRZ - Large lot residential zone.	that correspond with the intended housing typologies, density and character outcomes across the Site. SUB-P3(1) – Lot size, dimensions, character and density: The UDA (refer to Appendix 10) confirms that the masterplan provides a range of residential lot types, including terrace lots, 7.5 m and 8 m lots, 10–11 m and 12–13 m lots, lots of 14 m or greater, sloping and irregular lots, and eight large-lot residential sites. Each lot type is associated with an identified housing typology, including terrace, duplex and detached housing, with future dwellings required to be accommodated within the approved lot boundaries and comply with the relevant typology drawings and Core Controls. Importantly, the typology plans (refer to Appendix 7) demonstrate that these lot dimensions are practically capable of accommodating the intended dwelling forms together with associated access, parking, outdoor living, landscaping and other residential amenity requirements. This includes tested terrace typologies on lots as narrow as 4.5 m, compact duplex typologies on 7.5–8 m lots, and detached and duplex options on wider 10–13 m lots. - This range of lot dimensions establishes a graduated pattern of residential intensity, with apartments and terrace housing providing the more intensive components, detached and duplex-capable lots establishing the principal suburban residential character, and the eight rural residential lots providing the lowest-intensity form at the Site's outer edge. The LVA (refer to Appendix 12) confirms that the differing lot dimensions provide variation in building separation, garden areas, dwelling types and streetscape character, while larger rural residential lots provide greater building separation, planting opportunities and a more open character appropriate to the transition to adjoining rural land.

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	The proposal does not seek to apply a uniform minimum lot size across the development. Rather, lot dimensions have been comprehensively planned and matched to the intended dwelling form, density and Site context. The masterplan (Appendix 6) demonstrates a deliberate progression from compact terrace and duplex lots through to conventional detached lots, split-level lots responding to topography and large-lot residential sites at the outer interface. Even where irregular lot configurations arise from road geometry, stormwater infrastructure or Site geometry, the majority are at least 300 m² and capable of containing a 12.5 m diameter circle, providing sufficient dimensions to accommodate the anticipated dwelling forms. The combination of the approved lot pattern, tested residential typologies, Core Controls and Residential Design Guidelines provides an integrated implementation framework that ensures the proposed lot sizes translate into the intended built-form, amenity and character outcomes. Overall, the proposed lot sizes and dimensions appropriately support the planned character and density of the Brymer development. The proposal is therefore considered generally consistent with Policy SUB-P3
SUB-P4 - Servicing Requirements (1) Require subdivision and development in all zones except for GRUZ - General rural zone and RLZ - Rural lifestyle zone to be serviced to a level that will provide for the anticipated activities in a structure plan, or otherwise anticipated within the zone, including through the provision of: (a) Reserves for community, active and passive recreation; (b) Pedestrian and cycle connections; (c) Roads;	The proposed Brymer development is considered consistent with Policy SUB-P4, as the subdivision has been comprehensively planned alongside the infrastructure and community facilities required to support the anticipated residential and mixed-use activities. The Infrastructure Report (refer to Appendix 13) confirms that the development can be serviced by an integrated package of transport, three-waters and utility infrastructure, delivered progressively alongside the staged development. In particular, Brymer provides for public parks, recreation reserves and an integrated open-space network, together with pedestrian and cycle connections linking residential areas, the neighbourhood centre, adjoining reserves and the wider

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(d) Public transport infrastructure, e.g. bus stops; (e) Telecommunications; (f) Electricity; (g) Stormwater collection, treatment, attenuation and disposal; (h) Wastewater treatment and reticulation; (i) Water provision for domestic and fire fighting purposes; and (j) Connections to identified adjacent future growth areas.	movement network. The internal road hierarchy has been designed to support walking, cycling and future public transport, with the transport work also identifying provision for future bus services and associated infrastructure. The UDA (refer to Appendix 10) further confirms that the proposal allows for longer-term connections to adjoining land and the wider transport network, reducing the risk of the development becoming isolated and supporting integration with future growth. The Infrastructure Report confirms that stormwater can be managed through an integrated treatment, attenuation and conveyance system; wastewater can connect to the existing public network through staged reticulation, pump stations and rising mains; and the proposed water network, including a new reservoir, can provide both potable and firefighting supply. WEL Networks and Tuatahi First Fibre have also confirmed that the development can be serviced for electricity and telecommunications, with the relevant networks to be incorporated into the detailed infrastructure design. Engagement with IAWAI has further informed the staging, sequencing and infrastructure required to connect Brymer to the reticulated water and wastewater networks. Accordingly, Brymer provides for the full range of infrastructure and servicing necessary to support the proposed community, with servicing coordinated with development staging and opportunities retained for integration with adjoining and future growth areas. The proposal is therefore considered to directly support Policy SUB-P4.
SUB-P5 - Co-ordination between servicing and development and subdivision (1) Ensure development and subdivision: (a) Is located in areas where infrastructure capacity has been planned and able to be funded;	The proposed Brymer development is considered generally consistent with Policy SUB-P5, as the subdivision, staging and infrastructure requirements have been developed in an integrated manner to ensure that development proceeds in step with the infrastructure necessary to service it. While the Site is not within an approved structure plan area, the proposal is supported by a comprehensive

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(b) Where located in areas subject to an approved structure plan, provides sufficient infrastructure capacity to meet the demand identified in the structure plan; (c) Within urban areas (including Future Urban Zone), achieves the lot yield anticipated in an approved structure plan; and (d) Includes infrastructure provision for both the strategic infrastructure network and local infrastructure connections.	Masterplan and wider Concept Plan and has been subject to detailed infrastructure investigations and engagement with WDC, HCC and IAWAI. • SUB-P5(1)(a) – Infrastructure capacity and funding: The Infrastructure Report (refer to Appendix 13) confirms that the necessary transport, stormwater, wastewater, water and utility infrastructure can be provided to service the development. Water and wastewater network modelling and engagement with IAWAI have progressively identified the infrastructure requirements and servicing solutions, with draft conditions and a Private Development Agreement being progressed to formalise timing, sequencing, funding and delivery arrangements. The Applicant will fund the infrastructure required to enable the development, thereby avoiding reliance on uncommitted local authority funding. • SUB-P5(1)(b) and (c) – Structure plan capacity and yield: These provisions are not directly applicable, as Brymer is not located within an approved structure plan area and therefore there is no approved structure plan infrastructure demand or prescribed lot yield against which the proposal is required to be assessed. Nevertheless, the proposed yield of approximately 1,043 dwellings has been developed alongside the Site-specific infrastructure strategy, with servicing and infrastructure delivery linked to the staged development programme. • SUB-P5(1)(d) – Strategic and local infrastructure: Brymer provides for both the local infrastructure required to service individual stages and the strategic connections necessary to integrate the development with wider networks. This includes internal roads and active-mode connections, water and wastewater reticulation and strategic network connections, stormwater treatment and conveyance, and utilities. The wider Concept Plan also provides for longer-term

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	connections and integration with surrounding and future development. Consultation with WDC and HCC has specifically addressed infrastructure delivery, staging, connectivity and the relationship of Brymer with the wider growth area. Accordingly, although Brymer is not development anticipated by an approved structure plan, the proposal achieves the underlying intent of Policy SUB-P5 through a comprehensive and funded infrastructure strategy that coordinates development staging, local servicing and strategic network requirements. On this basis, the proposal is considered generally consistent with Policy SUB-P5.
SUB-P6 - Achieving sufficient development density to support the provision of infrastructure services in areas without a structure plan In areas where there is no structure plan, ensure that the land is developed efficiently to support the provision of infrastructure services.	The proposed Brymer development is considered consistent with Policy SUB-P6. While the Site is not subject to an approved structure plan, the masterplan provides for an efficient urban form and sufficient development density to support the provision of infrastructure services. The UDA (refer to Appendix 10) confirms that approximately 1,043 dwellings are accommodated through a deliberate range of housing forms, including apartments, terrace housing, duplexes and detached dwellings, rather than a uniform low-density subdivision. This provides for efficient use of the land, with higher-intensity housing concentrated around the neighbourhood centre, key movement routes and public open spaces, while lower-intensity development responds to rural and established residential interfaces. This development density is supported by a comprehensively planned infrastructure strategy. The Infrastructure Report (refer to Appendix 13) confirms that water supply and wastewater will connect to the IAWAI reticulated networks, with internal reticulation and associated infrastructure established progressively as development is staged. The masterplan also provides for a well-connected road network and infrastructure corridors, together with an integrated stormwater system incorporating treatment, attenuation and conveyance measures. This coordinated

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	and staged approach ensures that each stage is appropriately serviced and enables the scale and density of Brymer to make efficient use of the infrastructure provided, rather than establishing a dispersed development pattern that would be inefficient to service. Accordingly, notwithstanding the absence of an approved structure plan, Brymer provides a compact and comprehensively planned urban development of sufficient scale and density to efficiently support the provision of infrastructure services and is therefore considered consistent with Policy SUB-P6.
SUB-P7 – Staging of subdivision Require any staging of subdivision to be undertaken in a manner that promotes efficient development and integration of infrastructure and community facilities.	The proposed Brymer development is considered consistent with Policy SUB-P7, as the subdivision has been deliberately structured to enable development, infrastructure and community facilities to be delivered progressively through stages in a coordinated and efficient manner. • The Staging Plan (refer to Appendix 6) identifies a staged residential programme comprising Stages 1–12, together with Stage 1A for the large lot residential lots, with individual stages ranging from 31 to 136 residential lots. The staging pattern follows the overall masterplan and movement structure, enabling successive residential areas to be developed in logical increments while progressively extending the internal road, pedestrian and cycle networks, open-space connections and supporting infrastructure. The wider Concept Plan also demonstrates how the proposed collector and local road network, pedestrian pathways and connections to the existing road network form part of an integrated movement framework rather than isolated stages. • The Infrastructure Report (refer to Appendix 13) confirms that water, wastewater, stormwater and transport infrastructure will be established progressively as development is staged, with each stage appropriately serviced

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	and integrated with the wider development and surrounding environment. Community facilities and open spaces are likewise embedded within the overall masterplan, including public parks, recreation reserves and the neighbourhood centre, allowing these facilities to be delivered in conjunction with the growth of the residential community. Accordingly, the proposed staging framework promotes efficient development and the coordinated delivery of infrastructure, movement connections and community facilities, and is therefore considered consistent with Policy SUB-P7.
SUB-P8 – Connectivity (1) Design subdivision in urban areas to support the creation of a liveable, walkable and connected neighbourhood to: (a) Provide a road network that is: (i) Easy and safe to use for pedestrians and cyclists; and (ii) Accessible for emergency and other services; (b) Provide connections with a variety of routes within the immediate neighbourhood and between adjacent land areas; (c) Provide connections to public transport, shops, schools, employment, open spaces and other amenities; (d) Provide vehicle crossings and associated access that allow for safe and efficient movement to and from sites; and (e) Minimise potential conflict between vehicles, pedestrians, and cyclists on the adjacent road network. (2) Design subdivision in rural areas to: (a) Provide accessibility for emergency and other services; and	The proposed Brymer development is considered consistent with Policy SUB-P8, as the subdivision has been designed as a connected urban extension that supports safe and convenient movement by vehicles, pedestrians and cyclists. The masterplan provides a legible hierarchy of public streets and private accessways that distributes movement across the Site, connects with the existing road network and provides for potential future connections to adjoining land where practicable. The Roding Hierarchy Plan identifies collector, commercial and local roads of differing functions, while the Concept Plan identifies multiple connections to the surrounding road network and pedestrian pathways through the development. Walking and cycling are integrated into the layout through connected footpaths, shared paths and mid-block pedestrian connections, including links to proposed and existing open spaces such as Te Kootii Park. The wider movement network connects the development towards Brymer Road, Grandview Road and Whatawhata Road/SH23 and provides access towards established centres and community facilities, including Dinsdale and Nawton, schools and surrounding parks. The Concept Plan also locates the proposed neighbourhood centres, public parks and

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(b) Provide vehicle crossings and associated access that allow for safe and efficient movement to and from sites.	higher-density residential areas within this connected movement framework, supporting convenient access to local services and amenities. Vehicle access is integrated with the street network, with the masterplan providing for individual vehicle crossings, JOALs and other access arrangements. The use of rear access arrangements for higher-density housing assists in reducing vehicle crossings along key street frontages and therefore potential conflicts between vehicles, pedestrians and cyclists. The overall street and access network also provides connectivity through the development for service and emergency vehicles. Accordingly, the proposed subdivision establishes a liveable, walkable and well-connected neighbourhood, providing a range of movement choices and connections to surrounding land, open spaces, centres and community facilities while appropriately managing vehicle access and interactions between transport modes. The proposal is therefore considered consistent with Policy SUB-P8.
SUB-P9 – Recreation and access (1) Provide for the recreation and amenity needs of residents within urban areas by: (a) Encouraging open spaces which are prominent and accessible by pedestrians; (b) Requiring the location, number and size of open spaces to be in proportion to the future density of the neighbourhood and provide for a range of different activities and users; and (c) Enabling pedestrian and/or cycle linkages.	The proposed Brymer development is considered consistent with Policy SUB-P9, as the masterplan provides an integrated network of open spaces, recreation areas and pedestrian and cycle connections that respond to the needs of the future residential community. The LVA (refer to Appendix 12) confirms that the proposal includes two public parks, two recreation reserves and 14 stormwater reserves, integrated with the wider blue-green network across the Site. The location and distribution of these spaces have been considered alongside the proposed housing densities and neighbourhood centre, with higher-density housing having a close relationship with public open space, pedestrian movement and principal streets. The Concept Plan also demonstrates that the proposed parks are distributed through the development and

Objective / Policy	Comment
	connect with the wider open-space network, including adjoining Te Kootii Park and nearby existing reserves. The UDA (refer to Appendix 10) identifies walking and cycling as a key component of the masterplan, with connected footpaths and shared paths, mid-block pedestrian connections where appropriate, and links to proposed and existing open spaces. The open-space provision has also been refined through engagement with WDC, including consideration of its location, scale, function and distribution, opportunities for recreation and community use, and integration with movement connections and natural features. Accordingly, Brymer provides a prominent, accessible and connected open-space network that supports a range of recreational and amenity functions and is linked through the pedestrian and cycle network. The proposal is therefore considered consistent with Policy SUB-P9.
SUB-P10 - Reverse Sensitivity (1) Other than in the GIZ – General Industrial zone and HIZ – Heavy industrial zone, development and subdivision design minimises the potential for reverse sensitivity effects on adjacent sites, adjacent activities, or the wider environment; and (2) Avoid, to the extent possible, and otherwise minimise, potential reverse sensitivity effects of locating new sensitive land uses in the vicinity of an intensive farming, extraction industry or industrial activity and regionally significant infrastructure.	The proposed Brymer development is considered generally consistent with Policy SUB-P10, as the subdivision and land-use pattern have been designed to minimise potential reverse sensitivity effects on adjoining rural activities, existing residential areas and regionally significant infrastructure, particularly SH23. The UDA and LVA (refer to Appendices 10 and 12) demonstrate that the masterplan manages sensitive interfaces through the distribution of land uses and densities, setbacks, lot configuration, landscaping, fencing and open-space edges. In particular, the lowest-intensity residential component is located toward the rural edge, with greater building separation, planting opportunities and a more open character assisting the transition between the urban neighbourhood and adjoining rural land. The wider masterplan also incorporates stormwater, recreation and

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	ecological areas along parts of the rural interface, providing additional physical separation from adjoining rural activities. The Acoustic Assessment (refer to Appendix 27) has specifically considered the potential effects associated with SH23. Dwellings within the State Highway Corridor Noise Control Boundary will be required to comply with NOISE-R44, including internal acoustic design requirements for road-traffic noise. The assessment concludes that compliance can be readily achieved through standard construction measures, with a recommended consent condition ensuring that affected future dwellings demonstrate compliance. This appropriately manages the potential for new sensitive activities to constrain the ongoing operation of SH23. Overall, while Brymer introduces residential activities adjacent to rural land and existing transport infrastructure, the comprehensive layout, lower-intensity edge treatments, physical separation, landscaping and acoustic controls provide an appropriate response to these interfaces. Accordingly, potential reverse sensitivity effects are avoided or minimised to the extent practicable, and the proposal is considered generally consistent with Policy SUB-P10.
SUB-P15 – Effects of subdivision and development on soils in the GRUZ – General Rural Zone Subdivision, use and development minimises the fragmentation of productive rural land, particularly where high class soils are located.	The proposal is not directly consistent with Policy SUB-P10, as it will result in the permanent urbanisation of land currently within the General Rural Zone, including land classified as highly productive land, and will therefore reduce the area available for productive rural use. However, the proposal does not represent the type of fragmented or ad hoc rural subdivision that the policy principally seeks to manage. Rather, Brymer is a comprehensively planned urban development adjoining Hamilton’s existing urban boundary and established residential areas, providing approximately 1,043 dwellings together with supporting infrastructure, neighbourhood-scale commercial activities, open space and ecological restoration.

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	Importantly, the soils assessment (refer to Appendix 29) provides more detailed site-specific information regarding the productive characteristics of the land. While the NPS-HPL classification relies on regional-scale NZLRI mapping, the detailed assessment identifies that approximately 40% of the Site comprises LUC 4–6 land and non-productive areas, indicating that the Site does not comprise a wholly cohesive or versatile productive land resource. The loss of productive land must also be considered against the significant benefits of locating urban growth in this location. Brymer adjoins Hamilton's existing urban area, responds to an identified housing capacity shortfall and can deliver substantial housing supply in a timely manner, with the developer funding and providing the infrastructure required to service the development. The economic assessment concludes that the resulting environmental, social, cultural and economic benefits outweigh the long-term costs associated with the loss of the classified highly productive land. Accordingly, while the proposal is inconsistent with the specific direction of Policy SUB-P10 insofar as productive rural land will be urbanised, the development represents a consolidated and comprehensively planned urban expansion rather than fragmentation of rural land. In the context of the Site's productive constraints, identified housing need and significant urban-development benefits, the proposed departure from the policy is considered appropriate.
<i>Natural environment values</i>	
<i>ECO – Ecosystems and indigenous biodiversity</i>	
Objective ECO-O2 – Biodiversity and ecosystems. Indigenous biodiversity and the life-supporting capacity of indigenous ecosystems are maintained or enhanced.	The Brymer EclA (refer to Appendix 23) identifies that the Site is highly modified by its historic agricultural use, with existing watercourses generally providing very low

Objective / Policy	Comment
	ecological function and the natural wetlands being degraded and predominantly exotic, although retaining moderate ecological value and restoration potential. The proposal applies the effects management hierarchy and incorporates a substantial programme of ecological restoration and enhancement. While some wetland and stream habitat will be affected, approximately 0.75 ha of new wetland habitat will be created and approximately 1.197 ha of existing wetlands restored, including through indigenous planting, livestock exclusion and pest control. The EclA anticipates that restored wetlands will increase from moderate to high ecological value and become better connected with the stream network, kānuka treeland and created wetland habitat. Stream creation and restoration, together with indigenous riparian planting, will further improve habitat quality and connectivity across the Site. Importantly, the EclA concludes that the proposed package is expected to achieve net positive biodiversity outcomes, including from the first stage of development. Accordingly, the proposal will not only manage the loss and modification of existing ecological features but will provide for the restoration, enhancement and improved connectivity of indigenous habitats, supporting the maintenance and enhancement of indigenous biodiversity and the life-supporting capacity of ecosystems over time.
Policy ECO-P8 – Maintaining and enhancing biodiversity. (1) Identify and protect indigenous vegetation and habitats of indigenous fauna. (2) Enable activities that maintain or enhance indigenous biodiversity including: (a) Planting using indigenous species suitable to the habitat and eco-sourcing these where practical; (b) The removal or management of pest plant and animal species; and	The Brymer EclA (refer to Appendix 23) has identified the indigenous vegetation and habitats present across the Site and the proposal has been designed to retain and enhance the areas with the greatest ecological value and restoration potential. In particular, the existing 1.52 ha kānuka treeland will be retained and protected, while approximately 26.7 ha of wetland, riparian, hillside and stormwater reserve areas will be planted and/or enhanced. These areas are integrated to strengthen

Objective / Policy	Comment
(c) Biosecurity works. (3) Avoid, remedying or mitigate adverse effects on indigenous biodiversity, including by considering: (a) The range of natural food sources required to sustain indigenous fauna; (b) Habitats of threatened and at risk species; (c) Ecological sequences; (d) Migratory pathways; (e) Pest plants and pest animals; (f) Natural waterway habitats and hydrology; (g) Ecological corridors, natural processes and buffer areas; and (h) Legal and physical protection of existing habitat. (4) Provide for the removal of manuka or kanuka on a sustainable basis.	ecological connections between wetlands, streams and terrestrial habitat across the Site. The proposal also provides for the restoration of approximately 1.2 ha of existing natural wetlands, creation of more than 0.75 ha of new wetland habitat, and associated buffer planting using indigenous species suited to differing wetland conditions. Restoration will include removal of grazing and pest plant and animal control, with the EclA concluding that these measures will have positive ecological effects. Consistent with ECO-P8(2)(a), the CIA (refer to Appendix 24) specifically recommends that riparian and wetland planting utilise eco-sourced native species from within the catchment wherever practicable. Adverse effects on indigenous fauna are also specifically addressed through the proposed management framework. This includes bird nesting checks, lizard salvage and relocation and pest control, together with bat roost protocols and longer-term replacement and enhancement of bat habitat through indigenous planting. Biosecurity protocols will also manage the potential introduction of pest plants and plant pathogens during construction. Freshwater habitat and connectivity will be improved through stream restoration and creation, wetland enhancement and improved fish passage, while stormwater flows will be managed to maintain wetland hydrology. Overall, the proposal provides a comprehensive approach to avoiding, remedying and mitigating effects on indigenous biodiversity, while delivering substantial restoration, planting, pest management and habitat connectivity measures. The EclA anticipates net positive ecological outcomes, including increased habitat quality and connectivity and long-term protection of restored ecological features, and the proposal is therefore considered consistent with Policy ECO-P8.

Objective / Policy	Comment
Policy ECO-P9 - Management hierarchy outside Significant Natural Areas. (1) Maintain or enhance indigenous biodiversity outside Significant Natural Areas by: (a) Avoiding, as far as practicable, the significant adverse effects of vegetation clearance and the disturbance of habitats in the first instance; (b) Remedying any significant adverse effects that cannot be avoided; then (c) Mitigating any significant adverse effects that cannot be remedied; and (d) After remediation or mitigation has been undertaken, offset any significant residual adverse effects in accordance with Policy ECO-P10. (e) If offsetting of any significant residual adverse effects in accordance with Policy ECO-P10 is not feasible, then biodiversity compensation may be considered. (f) If biodiversity compensation of any significant residual adverse effects is not appropriate, the activity itself is avoided. Clause (f) does not apply to the development, operation, maintenance, or upgrade of renewable electricity generation assets and activities and electricity transmission network assets and activities. (2) When evaluating the significance of adverse effects of vegetation clearance and the disturbance of habitats, consider; (a) The values of indigenous biodiversity by reference to the criteria in APP2; and (b) The operational and functional requirements and benefits of infrastructure, where no reasonably practicable alternative location exists.	The Brymer EclA (refer to Appendix 23) confirms that no terrestrial vegetation within the Site meets the relevant significance criteria, while the Site's modified watercourses and artificial drains are also not considered significant. The existing wetlands are of moderate ecological value, primarily because wetlands are a threatened and under-represented habitat type, notwithstanding their generally degraded condition. The proposal has applied an effects management hierarchy to the identified ecological effects. Areas with higher ecological value or restoration potential are retained and enhanced where practicable, including the existing kānuka treeland and the majority of the Site's natural wetlands. Where habitat disturbance cannot be avoided, effects on indigenous fauna will be managed through measures including bat roost protocols, bird nesting checks, lizard salvage and relocation, biosecurity controls and habitat restoration. The EclA specifically assesses ecological effects and identifies measures to avoid, minimise, remedy or mitigate those effects before addressing residual effects through the proposed ecological compensation package. Residual effects principally relate to the loss of approximately 0.514 ha of modified natural wetland habitat and effects on modified watercourses. These effects are addressed through an on-site package of wetland creation and restoration, stream restoration and creation, indigenous planting, buffers, pest control and long-term protection. More than 0.75 ha of new wetland will be created and approximately 1.197 ha of existing wetland restored, with the created and restored wetlands to be legally protected in perpetuity. The EclA's Biodiversity Compensation Model predicts a 13.2% net positive outcome for wetland habitat, with net positive outcomes also anticipated for stream habitat. The CIA (refer to Appendix 24) similarly supports an approach whereby adverse effects are avoided where practicable and otherwise

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	remedied or mitigated, with on-site restoration preferred and biodiversity offsetting treated as a last resort. Accordingly, the proposal appropriately progresses through the effects management hierarchy and, where residual ecological effects remain, provides a comprehensive on-site restoration and compensation package designed to achieve a net positive ecological outcome. The proposal is therefore considered consistent with Policy ECO-P9.
<i>General district-wide matters</i>	
<i>EW – Earthworks</i>	
Objective EW-O1 – Earthworks in all zones except the MRZ 1 - Medium density residential zone 1 and MRZ2 - Medium density residential zone 2. Earthworks facilitate subdivision, use and development.	The proposed Brymer development is considered consistent with Objective EW-O1, as the proposed earthworks are necessary to facilitate the comprehensive subdivision and development of the Site. The earthworks will establish suitable building platforms, the road and movement network, infrastructure corridors, stormwater facilities and reserves, while responding to the Site's existing topography and geotechnical conditions. The Infrastructure Report (refer to Appendix 13) identifies approximately 73 ha of ground disturbance, comprising the cut, fill and site formation required to enable the development. The GIR (refer to Appendix 17) confirms that earthworks and ground improvement can appropriately address the Site's geotechnical conditions, including compressible soils within low-lying areas. This includes preloading where required, engineered fill and appropriate treatment of unsuitable materials to establish suitable building platforms and infrastructure. Earthworks will be undertaken in accordance with relevant engineering standards and under the guidance of a Chartered Geo-professional.

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	The Earthworks Management Plan and Infrastructure Report (refer to Appendices 32 and 13) also provide for staged earthworks and erosion and sediment controls, with measures to be established prior to works commencing and implemented in accordance with the Waikato Regional Council guidelines. Accordingly, the earthworks are an integral and appropriately managed component of enabling the planned subdivision, infrastructure and land-use outcomes for Brymer and are consistent with Objective EW-O1.
Policy EW-P2 – Earthworks in the GRUZ - General rural zone, FUZ - Future urban zone, CORZ - Corrections zone or TTZ - TaTa Valley zone. (1) Enable earthworks associated with rural or conservation activities including: (a) Ancillary rural earthworks; (b) Farm quarries; (c) The importation of controlled cleanfill material to a site; and (d) Indigenous biodiversity restoration. (2) Manage earthworks to ensure that: (a) Erosion and sediment loss is avoided or mitigated; (b) The ground is geotechnically sound and remains safe and stable for the duration of the intended land use; (c) Changes to natural water flows and established drainage paths are avoided or mitigated; (d) Adjoining properties and infrastructure are protected; (e) Historic heritage and cultural values are recognised and protected; and (f) Ecosystem protection, restoration, rehabilitation or enhancement works are encouraged.	The proposed earthworks will be undertaken in a manner that manages erosion and sediment loss and ensures that the resulting landform is geotechnically sound, safe and stable for the intended residential use. The GIR (refer to Appendix 17) identifies the key geotechnical constraints associated with the earthworks, including compressible and expansive soils, shallow groundwater, settlement and slope instability, and establishes appropriate mitigation measures. These include preloading and consolidation of compressible soils, controlled placement of engineered fill, appropriate cut and fill batter design, foundation design and geotechnical construction monitoring. Slope stability assessments confirm that the proposed slopes meet the requisite factors of safety under the assessed static conditions, including elevated groundwater conditions, with further detailed assessment and design where required. The Infrastructure and Earthworks Reports (refer to Appendix 13) provide further detail on the management of the approximately 73 ha earthworks area. Earthworks will be undertaken progressively, with erosion and sediment controls established before works commence and designed in accordance with Waikato Regional Council guidance. Controls include clean and dirty water diversions, sediment retention devices, banded stockpiles and progressive stabilisation, with exposed areas limited as far as practicable. The earthworks strategy also responds to the Site's existing drainage and wetland systems, including by coordinating preload boundaries with

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	proposed stormwater and wetland areas and reviewing the construction sequence where earthworks, drainage changes and wetland works interact. Imported material required for peat preloading is also proposed to be reused within the development following preloading, reducing the amount of additional fill required. The GEMP (refer to Appendix 18) provides additional measures to manage changes in groundwater conditions, ground settlement and potential effects on adjoining properties and infrastructure. It provides for groundwater and settlement monitoring and a Trigger Action Response Plan (TARP), with mitigation and contingency measures where unexpected effects are identified. Monitoring is particularly focused on areas where existing residential buildings, utilities or other assets could potentially be affected. Dewatering and trenching will also be managed to avoid uncontrolled loss of fines, base heave and off-site settlement. Accordingly, the GIR, GEMP and Infrastructure and Earthworks Reports provide a robust framework to ensure that erosion and sediment effects are minimised, changes to drainage and groundwater are appropriately managed, the completed landform remains safe and stable, and adjoining properties and infrastructure are protected. The proposal is therefore considered consistent with the relevant outcomes sought by Policy EW-P2(2)(a)–(d).
Part 3: Area-specific matters	
Zones	
GRUZ – General Rural Zone	
Objective GRUZ-O1 – Purpose of the zone Enable farming activities; (1) Protect high class soils for farming activities;	The proposed Brymer development is not consistent with the specific outcomes sought by Objective GRUZ-O1, as it will transition land currently zoned General Rural from farming to urban residential development, result in the loss of some high class soils, and materially change the Site’s existing rural character. The LVA (refer to

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(2) Provide for rural industry, infrastructure, rural commercial, conservation activities, community facilities, and extractive activities; (3) Maintain rural character and amenity; (4) Limit development to activities that have a functional need to locate in the zone.	Appendix 12) confirms that the proposal will result in a substantial and permanent change from an open pastoral landscape to an urban neighbourhood and therefore will not maintain the existing rural character anticipated by the GRUZ. However, this inconsistency needs to be considered in the context of the Site's location and suitability for continued productive rural use. The Site directly adjoins Hamilton's established western urban boundary and is already influenced by adjoining residential development, roads and reserves. The proposal therefore represents a comprehensively planned and contiguous extension of the existing urban area rather than isolated development within the wider rural environment. Further, the Soil and LUC Assessment (refer to Appendix 29) identifies that the areas meeting the District Plan definition of high class soil are relatively small and discrete, while approximately 48% of the Site is subject to soil wetness limitations that constrain its long-term productive versatility. The Rural Productivity Assessment (refer to Appendix 29) further identifies physical, locational and economic constraints affecting ongoing primary production and concludes that the benefits of urban development outweigh the loss of the Site's productive capacity. Accordingly, while Brymer is inconsistent with GRUZ-O1 as a consequence of its proposed change from rural to urban use, that outcome is considered appropriate given the Site's immediate relationship with Hamilton, constraints on productive rural use, identified housing need, and the significant social and economic benefits arising from a comprehensively planned urban development.
Policy GRUZ-P4 - Productive rural activities (1) Enable the on-going use of the rural environment zone as a productive working environment by:	The proposed Brymer development is not directly consistent with Policy GRUZ-P4, as it will replace existing rural activities on the Site with urban development and will therefore reduce the extent of land available for productive rural use.

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(a) Recognising that buildings and structures associated with farming and forestry and other operational structures for productive rural activities contribute to rural character and amenity values; (b) Ensuring productive rural activities are supported by appropriate rural industries and services; (c) Providing for lawfully-established rural activities and protecting them from sensitive land uses and reverse sensitivity effects; and (d) Recognising the economic, social and cultural benefits that result from use and development of rural resources.	Importantly, the Rural Productivity Assessment (refer to Appendix 29) identifies that the Site itself is subject to significant and long-term constraints on productive rural use. These include poorly and very poorly drained soils, elevated seasonal groundwater, wetness and flooding constraints, fragmented areas of higher-quality soils, limited effective production area and increasing reverse sensitivity pressures associated with the adjoining urban environment. Alternative productive uses, including arable cropping, dairy farming or dairy support and horticulture, have been assessed with the Rural Productivity assessment concluding that none overcome the identified constraints on economic viability. The assessment ultimately concludes that the Site is not economically viable for land-based primary production over the next 30 years and that there are no reasonably practicable land-use or management options that would materially improve its productive capacity or economic performance. This reduces the potential for the proposal to displace or constrain viable productive rural activities on the Site itself. The proposal is also comprehensively planned as an extension of Hamilton's existing urban area, rather than dispersed development within a productive rural environment. While some loss of rural productive capacity is unavoidable, the assessment concludes that the significant housing, employment, economic, social and environmental benefits of Brymer outweigh the productive benefits currently derived, or reasonably capable of being derived, from the Site. Accordingly, while there is some inconsistency with GRUZ-P4, the proposed transition from rural to urban use is considered appropriate in the particular circumstances of the Site.
GRUZ-P13 - Reverse sensitivity (1) New or extended sensitive land uses avoid or minimise potential reverse sensitivity effects on lawfully established activities including (but not limited to) productive rural activities, intensive farming, rural industry, infrastructure, industrial activities, extractive activities, by	The proposed Brymer development is considered generally consistent with Policy GRUZ-P13, as the subdivision has been designed to minimise potential reverse sensitivity effects arising from the introduction of sensitive residential activities adjacent to existing rural land uses and regionally significant transport infrastructure. The Site adjoins General Rural zoned land to the north, west and

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achieving adequate separation distances from site boundaries and/or adoption of appropriate measures.	south, including land used for pasture, grazing and rural-residential activities, while SH23 adjoins the southern boundary. These interfaces have been specifically considered through the masterplan and supporting technical assessments. The UDA and LVA (refer to Appendices 10 and 12) demonstrate that the rural interfaces are managed through graduated residential density, separation, setbacks, landscaping and open-space areas. In particular, the eight large-lot residential sites form the lowest-intensity component of the development and provide greater building separation, opportunities for boundary planting and a more open edge condition adjoining rural land. These measures provide an appropriate transition between urban development and adjoining rural properties and reduce the likelihood of incompatibility or future pressure on the continued operation of lawful rural activities. The Acoustic Assessment (refer to Appendix 27) has also specifically assessed the interface with SH23. The State Highway Corridor Noise Control Boundary extends approximately 25–95 m into the Site, and future dwellings within that area will be required to comply with NOISE-R44, including the applicable internal noise standard. The assessment confirms that compliance can be readily achieved through standard construction upgrades, with a condition recommended to ensure these requirements are addressed at the building consent stage. Accordingly, while the proposal introduces sensitive activities adjacent to rural land and significant transport infrastructure, the proposed separation, graduated density, landscape treatment and acoustic mitigation appropriately minimise the potential for reverse sensitivity effects. The proposal is therefore considered generally consistent with Policy GRUZ-P13.

Objective / Policy	Comment
Objective GRUZ-O2 – Productive capacity of soils The primary productive value of soils, in particular high class soils, is retained.	The proposed Brymer development is not consistent with the specific outcome sought by Objective GRUZ-O2, as urbanisation of the Site will result in the permanent loss of the primary productive value of soils within the development footprint, including areas identified as high class soil under the District Plan. However, the significance of this inconsistency is reduced by the findings of the detailed Soil and LUC Assessment and Rural Productivity Assessment (refer to Appendix 29). The Soil and LUC Assessment identifies that, based on detailed property-scale mapping, only approximately 2.5 ha (3.2%) of the 81 ha Site meets the WDP-OiP definition of high class soil, with those areas comprising relatively small and discrete pockets rather than a large and geographically cohesive soil resource. Further, approximately 48% of the Site is subject to soil wetness limitations, restricting long-term land-use options and the versatility of the soil resource. Consistent with these findings, the Rural Productivity Assessment identifies substantial physical, economic and locational constraints affecting the Site, including wetness and drainage limitations, fragmentation, reduced land-use versatility and reverse sensitivity pressures. Alternative productive uses, including arable cropping, dairy farming or dairy support and horticulture, have been assessed and do not overcome the constraints on economic viability. Accordingly, while the proposal does not retain the productive value of soils as sought by GRUZ-O2, the Site contains a limited and fragmented high class soil resource and has significant constraints on its ongoing productive use. In this context, and having regard to the substantial housing and wider urban-development benefits of Brymer, the inconsistency with the Objective is considered acceptable.

Objective / Policy	Comment
Policy GRUZ-P1 - High class soils Ensure the adverse effects of activities do not compromise the physical, chemical and biological properties of high class soils.	The proposed Brymer development is not directly consistent with Policy GRUZ-P1, as urbanisation and associated earthworks will permanently modify areas of high class soil within the Site, meaning their physical properties and productive function will not be retained. However, the significance of this inconsistency is substantially reduced by the findings of the detailed Soil and LUC Assessment (refer to Appendix 29). The site-specific assessment identifies only approximately 2.5 ha (3.2%) of the 81 ha Site as meeting the WDP-OiP definition of high class soil, with the remaining 96.8% not classified as high class soil. The identified high class soils occur in small, discrete areas, separated from any large and geographically cohesive area of high class soil and are not considered sufficient in size to be practically managed differently from the surrounding LUC units. Further, the Site has significant inherent soil constraints, particularly wetness and poor drainage, with approximately 48% of the Site subject to soil wetness limitations that restrict long-term land-use options. Accordingly, while the proposal will modify and remove the productive function of the limited high class soil resource and is therefore inconsistent with GRUZ-P1, the extent and significance of that inconsistency is limited given the small, fragmented nature of the high class soils and the wider constraints affecting productive use of the Site.
Policy GRUZ-P2 - Effects of subdivision and development on soils Subdivision, use and development minimises the fragmentation of productive rural land, particularly where high class soils are located.	The proposed Brymer development is not directly consistent with Policy GRUZ-P2, as the subdivision and urbanisation of the Site will result in the permanent loss of productive rural land. However, the proposal does not result in the type of ad hoc or dispersed fragmentation of rural land that the policy seeks to minimise. Rather, Brymer comprises a comprehensively planned urban development adjoining

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	Hamilton's existing urban boundary, consolidating development within a single integrated area. The Soil and LUC Assessment (refer to Appendix 29) identifies that only approximately 2.5 ha (3.2%) of the 81 ha Site meets the WDP-OiP definition of high class soil. These areas are small and discrete, while the wider Site is subject to significant wetness, drainage and erosion limitations that constrain productive use. The Rural Productivity Assessment (refer to Appendix 29) further concludes that alternative productive uses do not overcome the Site's physical, economic and locational constraints, with the assessed alternative production systems remaining economically unviable. Accordingly, while the proposal will result in the loss of productive rural land and is therefore inconsistent with the specific direction of GRUZ-P2, it avoids creating a fragmented rural subdivision pattern. Given the limited and discrete high class soil resource, the constraints on viable primary production, and the comprehensive urban form proposed, the inconsistency with the Policy is considered acceptable.
GRUZ-O3 - Rural character and amenity (1) Maintain rural character and amenity. (2) The attributes of areas and features valued for their contribution to landscape values and visual amenity are maintained or enhanced.	The proposed Brymer development will result in a change to the existing rural character and amenity of the Site through its transition from an open pastoral landscape to a comprehensively planned residential neighbourhood. However, the LVA (refer to Appendix 12) identifies that the Site forms part of a modified rural edge landscape, is already influenced by Hamilton's adjoining urban area, and is not subject to any Outstanding Natural Landscape, Outstanding Natural Feature or Significant Natural Area overlay. Accordingly, the LVA assesses the Site as having lower landscape value and lower susceptibility to change, while recognising its local values associated with rural openness, undulating landform, wetlands, drainage patterns and the relationship between whenua and wai.

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	While the existing rural character cannot be maintained unchanged, the proposal has been designed to manage the transition and maintain or enhance important landscape and visual amenity values where practicable. This includes a comprehensive blue-green and open space network incorporating retained and enhanced wetlands, wetland creation, new stream channels, riparian and buffer planting, two public parks, two recreation reserves and 14 stormwater reserves. Higher-intensity development is generally located internally, with lower-intensity housing, including rural residential lots, used toward parts of the Site's outer edges to provide a transition to adjoining rural land. The LVA concludes that these measures will increasingly soften and structure the development as planting establishes, improve visual amenity and the coherence of the new urban edge, and reduce overall landscape and visual effects towards Moderate over time. On this basis, while recognising the unavoidable change in rural character arising from urbanisation of the Site, the proposal appropriately responds to and manages the landscape and amenity values relevant to GRUZ-O3.
GRUZ-P3 - Contributing elements to rural character and amenity values Recognise that rural character and amenity values vary across the zone as a result of the natural and physical resources present and the scale and extent of land use activities.	The proposed Brymer development is considered partially consistent with Policy GRUZ-P3. The proposal recognises that rural character and amenity are not uniform across the General Rural Zone and that the character of this Site is influenced by both its existing rural attributes and its immediate relationship with Hamilton's established urban edge. The LVA (refer to Appendix 12) identifies the Site's existing rural character as comprising an open pastoral pattern, relatively limited built development, landform, wetlands and watercourses, mature vegetation and its relationship with remaining rural land to the west and south. However, the Site is already influenced by adjoining residential development, roads, reserves and other urban-edge activities and is

Objective / Policy	Comment
	therefore characterised as a modified rural-edge landscape, rather than an isolated or highly intact rural environment. Brymer will result in a permanent change to these existing rural character and amenity values, particularly through the loss of rural openness and introduction of urban built form, roads and associated earthworks. The LVA identifies these effects as adverse, while also recognising beneficial components associated with the proposed blue-green network, wetland and stream enhancement, riparian and buffer planting, and extensive public open-space network. The masterplan also provides a graduated transition in residential intensity, with lower-density development and greater opportunities for planting toward the rural edge to assist in managing the interface with adjoining rural land. Accordingly, while the proposal will not maintain the Site’s existing rural character, it appropriately recognises the particular character and amenity values of this urban-edge location and incorporates measures to manage the transition to adjoining rural land. On that basis, the proposal is considered partially consistent with Policy GRUZ-P3.

Operative District Plan (Waikato Section)

Objective / Policy	Comment
Part 1: Issues, Objectives, Policies	
1A Waikato District Growth Strategy	
Objective 1A.2.1 Towns, villages and other defined growth areas are the focus of future residential, industrial and commercial development.	The proposed Brymer development is considered not directly consistent with Objective 1A.2.1, as the Site is currently zoned General Rural and is not identified as a town, village or other defined growth area under the Operative Waikato District Plan. However, the proposal represents a contiguous extension of Hamilton’s established urban area, rather than dispersed or isolated urban development within the wider rural environment. The Economic Assessment (refer to Appendix 30) confirms that, despite being within Waikato District, the Site directly adjoins Hamilton’s western urban edge and its urbanisation would function as part of the wider Hamilton urban area, with convenient access to established employment, education, retail, recreation and community facilities. The strategic appropriateness of this location is reinforced by the scale of housing demand identified in the Economic Assessment, which finds that growth pressures across Hamilton and the lower Waikato District are expected to generate strong demand for greenfield housing over the short, medium and long term, exceeding currently planned capacity. The proposal therefore provides substantial additional housing capacity in a location that is physically integrated with an existing urban area and can be comprehensively planned and serviced. Accordingly, while Brymer is outside the defined growth areas anticipated by Objective 1A.2.1, its location immediately adjoining Hamilton, together with the identified need for additional housing capacity and its comprehensive urban form,

Objective / Policy	Comment
	provides a strong planning basis for the proposed development notwithstanding this inconsistency.
Policy 1A.2.2 Subdivision, use and development of an urban nature should occur within clearly defined boundaries of towns and villages rather than in rural areas.	The proposed Brymer development is not directly consistent with Policy 1A.2.2, as the Site is currently zoned General Rural and lies outside the defined urban boundary anticipated by the Operative District Plan. However, the proposal does not represent isolated or dispersed urban development within the rural environment. Rather, the Site directly adjoins Hamilton’s established western urban edge, including the residential areas of Grandview Heights and Western Heights, and will form a contiguous and comprehensively planned extension of the existing urban area. The Economic Assessment (refer to Appendix 30) identifies strong and sustained housing demand across Hamilton and the lower Waikato District, while the proposal will provide substantial additional housing capacity in a location closely connected to Hamilton’s existing employment, services and facilities. The UDA (refer to Appendix 10) further supports the Site as an appropriate location for sustainable residential growth at the urban boundary, with an integrated urban form, movement network, infrastructure, open space and appropriate treatment of rural interfaces. Accordingly, while the proposal is inconsistent with the specific locational direction of Policy 1A.2.2, Brymer represents a logical extension of Hamilton rather than ad hoc urbanisation of the rural environment. Its strategic location, comprehensive planning and contribution to identified housing demand provide a strong basis for the proposal notwithstanding this inconsistency.
Policy 1A.2.4	The proposed Brymer development is considered partially consistent with Policy 1A.2.4. While the Site is not an identified growth area under the Operative District

Objective / Policy	Comment
New growth areas, including new rural residential areas, should be identified and planned for in conjunction with towns and villages where they support local services and minimise adverse effects on productive rural activities and lawfully established rural-based activities.	Plan, it directly adjoins Hamilton’s established western urban edge and represents a contiguous, comprehensively planned extension of the existing urban area, rather than isolated development within the wider rural environment. The Economic Assessment (refer to Appendix 30) describes Brymer as a comprehensively planned residential development on Hamilton’s western urban edge, providing approximately 1,043 dwellings and a neighbourhood centre to provide local amenity. The proposal will support existing services and facilities within the wider Hamilton urban area, while also providing integrated infrastructure, open space and neighbourhood-scale commercial activities to meet the day-to-day needs of future residents. The development will therefore reinforce and extend the existing urban area in a coordinated manner rather than establishing a separate settlement. While urbanisation will result in the loss of existing productive rural land, the Rural Productivity Assessment (refer to Appendix 29) identifies substantial physical, economic and locational constraints affecting its productive use, including wetness limitations, reduced land-use versatility, fragmentation and reverse sensitivity effects. Alternative productive uses have been assessed and do not overcome the Site’s economic viability constraints. Accordingly, although Brymer was not previously identified and planned as a growth area, its relationship with Hamilton, ability to support and integrate with local services, and the limited viability of ongoing productive rural use provide a strong basis for the proposed urban development in the context of Policy 1A.2.4.
Policy 1A.2.5 Urban development should occur in an integrated manner so that employment and recreation areas are easily accessible from residential areas.	The proposed Brymer development is considered consistent with Policy 1A.2.5, as it has been comprehensively planned to integrate residential development with employment, recreation and other day-to-day activities. The masterplan includes a

Objective / Policy	Comment
	neighbourhood centre comprising approximately 2,184 m² of commercial GFA, providing local services and employment opportunities within the development. The UDA (refer to Appendix 10) demonstrates that the neighbourhood centre and associated neighbourhood park are integrated within the residential areas and movement network, with the distribution of residential densities responding to these facilities and other open spaces. The wider open-space network includes public parks, recreation reserves, stormwater reserves and the blue-green network, providing a range of recreational opportunities throughout the Site. Importantly, these destinations are connected by an integrated movement network incorporating roads, footpaths, pedestrian connections and pathways through open-space and reserve areas, with provision also made for future public transport. This enables residents to conveniently access employment, recreation and local services by a range of transport modes and supports the integrated urban form sought by Policy 1A.2.5.
Policy 1A.2.6 Subdivision, use and development should be managed so that a range of lifestyle choices is available, while ensuring residential development occurs in identified towns, villages and other defined growth areas.	The proposed Brymer development is considered partially consistent with Policy 1A.2.6. The proposal strongly supports the first part of the Policy by providing a broad range of housing and lifestyle choices. However, the Site is currently zoned General Rural and is not within an identified town, village or defined growth area under the Operative District Plan. The Economic Assessment (refer to Appendix 30) confirms that Brymer provides approximately 1,043 dwellings across a diverse range of typologies, sizes and price points, including apartments, terraces, duplexes and detached dwellings. This mix is specifically intended to respond to different household sizes, preferences and stages of life, and enables households to make trade-offs between dwelling type, size, location and price. The assessment also identifies that up to 24% of dwellings could

Objective / Policy	Comment
	fall within the assessed affordable dwelling value bands, further broadening the range of housing choices available. While Brymer does not satisfy the Policy's direction that residential development occur within an identified growth area, it directly adjoins Hamilton's established urban area and represents a comprehensively planned and contiguous urban extension rather than dispersed residential development in the rural environment. Further, the Economic Assessment identifies substantial medium and long-term housing demand and capacity shortfalls within the Hamilton and lower Waikato housing market. Accordingly, while partially inconsistent with the locational component of Policy 1A.2.6, Brymer strongly advances its housing and lifestyle choice outcome, and the departure from the identified growth pattern is considered appropriate given the Site's urban-edge location and demonstrated need for additional housing capacity.
Objective 1A.2.9 Rural areas are maintained as a resource for productive rural activities and lawfully established rural-based activities.	The proposed Brymer development is not consistent with the specific direction of Policy 1A.2.9, as urbanisation of the Site will permanently remove land from the rural resource and prevent its ongoing use for productive rural activities. However, the significance of this inconsistency is reduced by the findings of the detailed Soil and LUC Assessment and Rural Productivity Assessment (refer to Appendix 29). The Soil and LUC Assessment confirms that only approximately 2.5 ha (3.2%) of the Site meets the WDP-OiP definition of high class soil, with the remaining 96.8% not classified as high class soil. The wider Site is also subject to significant physical constraints, particularly poorly drained soils, elevated seasonal groundwater and prolonged wetness, which restrict land-use versatility and the practical ability to undertake productive activities.

Objective / Policy	Comment
	The Rural Productivity Assessment has considered alternative productive uses, including arable cropping, dairy farming or dairy support and horticulture, as well as whether amalgamation or boundary adjustments could overcome existing fragmentation constraints. It concludes that these alternatives do not overcome the constraints on economic viability, with the assessed properties showing a loss in profitability. The assessment therefore concludes that the Site has limited productive capacity and is unable to sustain economically viable land-based primary production, and that the benefits of the proposed urban development outweigh the productive benefits currently or reasonably capable of being derived from the Site. Accordingly, while Brymer is inconsistent with Policy 1A.2.9 because the Site will no longer be retained for rural activities, the specialist assessments demonstrate that its value as an ongoing productive rural resource is materially constrained. In the context of these constraints and the significant housing and wider urban-development benefits of Brymer, the departure from the Policy is considered appropriate.
Policy 1A.2.12 Subdivision, use and development that is not directly associated with productive rural activities should occur in towns, villages and other defined growth areas.	The proposed Brymer development is not consistent with the specific locational direction of Policy 1A.2.12, as the development is not directly associated with productive rural activities and the Site is currently zoned General Rural rather than being within an identified town, village or defined growth area. However, Brymer directly adjoins Hamilton’s established western urban edge and would function as part of the wider Hamilton urban area, rather than establishing an isolated or dispersed pocket of urban development within the rural environment or on high quality productive land. The Economic Assessment (refer to Appendix 30) confirms that the Site is contiguous with Hamilton and has convenient access to established employment, education, retail, recreation and community facilities.

Objective / Policy	Comment
	Importantly, the Rural Productivity Assessment (refer to Appendix 29) demonstrates that the Site is subject to substantial physical, economic and locational constraints affecting its continued use for land-based primary production. As discussed in relation to the preceding rural policies, alternative productive uses do not overcome the Site's economic viability constraints. The Soil and LUC Assessment also confirms that only approximately 2.5 ha (3.2%) of the Site meets the WDP-OiP definition of high class soil. Accordingly, while the proposal is inconsistent with Policy 1A.2.12, the Site's limited long-term productive potential, its location immediately adjoining Hamilton, and the identified demand for additional housing provide a strong basis for urban development in this location notwithstanding the Policy's locational direction.
Policy 1A.2.13 The potential for reverse sensitivity effects on productive rural activities and lawfully established rural-based activities should be avoided.	The proposed Brymer development is considered generally consistent with Policy 1A.2.13, as the masterplan has been designed to minimise the potential for new sensitive residential activities to constrain productive rural and other lawfully established rural-based activities on adjoining land. The principal rural interface occurs along the western and northern edges of the Site, where adjoining properties comprise a mix of pasture, grazing and rural-residential activities. The UDA and LVA (refer to Appendices 10 and 12) demonstrate that this interface is managed through a graduated transition in development intensity. In particular, lower-intensity detached housing is generally located toward rural interfaces, including eight large-lot residential sites at the northern edge which provide greater building separation, opportunities for planting and a more open residential character. Setbacks, landscape treatment and adjoining open space and blue-green areas provide further separation and assist in reducing potential incompatibility between future residents and adjoining rural activities.

Objective / Policy	Comment
	Accordingly, while Brymer will introduce sensitive residential activities adjacent to rural land, the proposed separation, lower-intensity edge development and landscape treatment appropriately minimise the potential for reverse sensitivity effects and reduce the likelihood of existing lawful rural activities being constrained. The proposal is therefore considered generally consistent with Policy 1A.2.13.
Objective 1A.6.1 The capacity of rural areas to support productive rural activities and lawfully established rural-based activities is maintained.	The proposed Brymer development is not directly consistent with Objective 1A.6.1, as urbanisation will permanently remove the Site from rural production and therefore reduce the overall area available to support productive rural activities. However, the significance of this inconsistency is reduced by the Site's limited capacity to support economically viable primary production. The Soil and LUC Assessment and Rural Productivity Assessment (refer to Appendix 29) identify substantial physical, economic and locational constraints affecting the Site, including poor drainage and wetness, flooding and erosion limitations, fragmented landholdings, limited productive infrastructure, elevated land values and increasing urban influences. Only approximately 2.5 ha (3.2%) of the Site is identified as high class soil under the WDP-OiP definition. The Rural Productivity Assessment concludes that alternative productive uses, amalgamation, improved management and leasing would not overcome these constraints and that the Site cannot sustainably support a more intensive or economically viable form of land-based primary production. Importantly, the proposal has also been designed to maintain the ability for productive rural activities to continue on adjoining rural land. Larger residential lots, increased setbacks, landscape planting and reserves along parts of the rural interface provide separation between future residents and adjoining rural activities,

Objective / Policy	Comment
	reducing the potential for reverse sensitivity effects to constrain their ongoing operation. Accordingly, while Brymer will reduce the extent of land available for rural production and is therefore not fully consistent with Objective 1A.6.1, the Site has limited long-term productive capacity and the proposal appropriately manages effects on the continued productive use of the surrounding rural environment.
Policy 1A.6.2 Rural resources should be managed so that opportunities to use them for productive rural activities or lawfully established rural-based activities are retained.	The proposed Brymer development is not consistent with the specific direction of Policy 1A.6.2, as urbanisation of the Site will mean that opportunities to use the land for productive rural activities are not retained. However, the Soil and LUC Assessment and Rural Productivity Assessment (refer to Appendix 29) demonstrate that the significance of this loss is limited by the Site’s physical, economic and locational constraints. The Soil and LUC Assessment identifies only approximately 2.5 ha (3.2%) of the Site as high class soil under the WDP-OiP definition, with 48% of the Site subject to soil wetness limitations that materially restrict long-term productive land-use options. The Rural Productivity Assessment further considers alternative productive uses, improved management, amalgamation and leasing, and concludes that these options would not overcome the Site’s permanent or long-term economic viability constraints. In particular, increasing the scale of pastoral farming would not materially improve viability, while the available productive returns are insufficient to support a viable lease arrangement. Accordingly, while the proposal does not retain the Site itself as a rural resource and is therefore inconsistent with Policy 1A.6.2, the specialist assessments demonstrate that the practical opportunity for the Site to support viable productive rural activities is already materially constrained. In that context, the loss of the Site from rural

Objective / Policy	Comment
	production is considered acceptable and does not undermine the broader intent of retaining genuinely productive rural resources.
Policy 1A.6.3 Activities that are not related to productive rural activities should not locate in rural areas unless there is a demonstrable functional need and they will not constrain existing lawfully established productive rural activities, lawfully established rural-based activities or compromise access to and the extraction of mineral resources from Coal Mining Policy Areas.	The proposed Brymer development is not consistent with the specific locational direction of Policy 1A.6.3, as the proposed urban activities are not related to productive rural activities and do not have a functional need to locate within the rural area. However, the Site directly adjoins Hamilton’s existing urban area and, as discussed in relation to the preceding rural policies, its ongoing productive use is materially constrained. The Rural Productivity Assessment (refer to Appendix 29) identifies a combination of poor drainage and wetness, fragmented landholdings, reverse sensitivity, elevated land values and rates, and proximity to Hamilton as permanent or long-term constraints. It concludes that alternative productive systems, improved management, water management, amalgamation and leasing would not materially improve economic viability, and that the Site cannot sustainably support a more intensive or economically viable form of land-based primary production. Taken together, the findings of the Soil and LUC Assessment and Rural Productivity Assessment demonstrate that, where additional land is required to respond to identified housing demand, the Site represents a more appropriate location for urbanisation than genuinely highly productive rural land with greater productive capacity and long-term versatility. In this respect, directing growth to Brymer enables a more efficient use of the land resource while assisting in the protection of more productive rural land elsewhere. Importantly, the proposal has been designed to minimise reverse sensitivity effects on lawfully established rural activities on adjoining land, including through lower-intensity development, separation and landscape treatment at the rural interface.

Objective / Policy	Comment
	There are also no Coal Mining Policy Areas or identified mineral-resource access matters relevant to the Site, such that this aspect of the Policy is not engaged. Accordingly, while Brymer is inconsistent with the Policy because it introduces non-rural activities without a functional need to locate in the rural area, the Site's constrained productive potential, its location immediately adjoining Hamilton, and the measures incorporated to protect adjoining rural activities provide a strong basis for the proposal notwithstanding that inconsistency.
Objective 1A.8.1 Landscape, character and amenity values of rural areas are maintained.	The proposed Brymer development will result in a clear change to the existing rural landscape character and amenity of the Site through its transition from open pastoral land to a comprehensively planned residential neighbourhood. However, the LVA (refer to Appendix 12) identifies the Site as a modified rural edge landscape adjoining Hamilton's established urban area, with lower landscape value and lower susceptibility to change. While the Site retains local values associated with rural openness, undulating landform, wetlands, drainage patterns and the relationship between whenua and wai, it is not identified as an Outstanding Natural Landscape or Outstanding Natural Feature and is already influenced by pastoral modification, drainage and adjoining urban development. The proposal responds to these values through a comprehensive landscape framework that includes retained and enhanced wetlands, wetland creation, new stream channels, riparian and buffer planting, public parks, recreation reserves and stormwater reserves, together with lower-intensity housing and increased landscape treatment along parts of the Site's rural interfaces. These measures will retain and enhance important landscape features, provide visual relief and soften the transition between the proposed development and surrounding rural land as planting establishes. While the existing rural character cannot be maintained unchanged, the LVA concludes that the proposed landscape mitigation will

Objective / Policy	Comment
	progressively improve the coherence and visual amenity of the new urban edge, with overall landscape and visual effects reducing towards Moderate over time. Accordingly, the proposal appropriately maintains and responds to the landscape, character and amenity values of the surrounding rural environment, consistent with the intent of Objective 1A.8.1.
Policy 1A.8.2 Activities that do not have a functional need to establish in rural areas should be accommodated in towns, villages and defined growth areas.	The proposed Brymer development is not consistent with the specific locational direction of Policy 1A.8.2, as the proposed urban activities do not have a functional need to establish in the rural area and the Site is not currently within a town, village or defined growth area. However, the Site directly adjoins Hamilton’s established urban area and represents a contiguous urban extension rather than isolated development within the wider rural environment. Importantly, the Soil and LUC Assessment and Rural Productivity Assessment (refer to Appendix 29) demonstrate that the Site has limited value for ongoing productive rural use. Only approximately 2.5 ha (3.2%) of the Site meets the WDP-OiP definition of high class soil, with much of the Site affected by wetness, drainage and erosion limitations. The Rural Productivity Assessment further concludes that alternative productive uses, improved management, amalgamation and leasing would not overcome the Site’s physical and economic constraints. These findings indicate that, where additional land is required to respond to identified housing demand, Brymer represents a more appropriate location for urbanisation than genuinely highly productive rural land with greater productive capacity and long-term versatility. This is particularly relevant given the Economic Assessment identifies strong housing demand and a potential long-term shortfall of approximately 16,700 dwellings across the combined Hamilton and lower Waikato market.

Objective / Policy	Comment
	Accordingly, while Brymer is inconsistent with Policy 1A.8.2, its immediate relationship with Hamilton, limited long-term productive potential and contribution to meeting identified housing demand provide a strong basis for the proposed development notwithstanding the Policy's locational direction.
Policy 1A.8.3 The expansion of towns, villages and defined growth areas should occur in a manner that minimises the potential for conflicts with the surrounding rural area.	The proposed Brymer development is considered generally consistent with Policy 1A.8.3. While the proposal extends urban development into an area currently zoned for rural purposes, it directly adjoins Hamilton's established urban edge and has been comprehensively designed to manage the transition between the new neighbourhood and the surrounding rural environment. The UDA (refer to Appendix 10) identifies differing edge conditions around the Site, including rural and rural-lifestyle properties along the northern, western and southern interfaces, comprising a mix of pasture, grazing land, rural-residential activities, larger landholdings and established vegetation. The masterplan responds to these interfaces through a graduated distribution of residential density and a range of physical and landscape transition measures. Lower-intensity residential development is generally located toward the rural edges, including eight large-lot residential sites of more than 2,500 m² at the northernmost interface, providing greater building separation and opportunities for planting. Stormwater wetlands and corridors, wetland and watercourse margins, open-space areas and landscape planting along external boundaries provide additional separation and contribute to a softer transition between the urban neighbourhood and adjoining rural land. The LVA similarly confirms that the large-lot residential component has a specific role in managing the rural transition through greater building separation, generous planting, setbacks and retention of a relatively open edge condition.

Objective / Policy	Comment
	These measures, together with the comprehensive masterplanned approach to the Site, minimise potential amenity and reverse sensitivity conflicts that could otherwise arise from urban development adjoining rural activities. The proposal therefore provides a deliberate and graduated urban-rural interface rather than an abrupt or fragmented pattern of development. Overall, the integrated masterplan, graduated density, lower-intensity edge development, open-space and blue-green network, setbacks and landscape treatment appropriately minimise the potential for conflict with the surrounding rural area. The proposal is therefore considered generally consistent with Policy 1A.8.3.
Policy 1A.8.5 Subdivision, use and development in rural areas should be managed so that a range of lifestyle choices is available while ensuring that rural landscapes and rural character are retained.	The proposed Brymer development is considered consistent with Policy 1A.8.5. While the proposal will result in a transition from the Site's existing rural character to a comprehensively planned residential environment, the LVA (refer to Appendix 12) identifies the Site as a modified rural edge landscape adjoining Hamilton's established urban area, with lower landscape value and susceptibility to change. The Site is not identified as an Outstanding Natural Landscape or Outstanding Natural Feature, although it retains local landscape values associated with its rural openness, undulating landform, wetlands and drainage patterns. The proposal responds to these values through its landscape and development framework, including the retention and enhancement of wetlands, creation of new stream channels, extensive riparian and buffer planting, and provision of public parks, recreation reserves and stormwater reserves. Importantly, lower-intensity development, including large lot residential, is proposed along parts of the Site's outer edges, providing a greater range of housing and lifestyle choices while creating a transition between the more intensive residential development and adjoining rural land. These measures will retain and reinforce key elements of the Site's existing

Objective / Policy	Comment
	landscape character and soften the new urban-rural interface as planting establishes. Accordingly, while recognising that the Site itself will undergo an unavoidable change in character, the proposal provides for a range of residential and lifestyle choices while appropriately managing and responding to the landscape and rural character values of the surrounding rural environment, consistent with the intent of Policy 1A.8.5.
Policy 1A.8.6 Subdivision, use and development in rural areas that have been modified through development should be managed to ensure that cumulative adverse effects do not compromise rural landscapes and rural character.	The proposed Brymer development is considered consistent with Policy 1A.8.6. The LVA (refer to Appendix 12) identifies the Site as forming part of a modified rural edge landscape, influenced by existing pastoral modification and its proximity to Hamilton’s established urban area. While the development will result in a clear change from the Site’s existing open rural character to a residential environment, the Site has lower landscape value and susceptibility to change and is not identified as an Outstanding Natural Landscape or Outstanding Natural Feature. The potential for cumulative effects on the wider rural landscape has been addressed through the overall structure and landscape treatment of the development. The proposal retains and enhances key natural features, including wetlands and drainage patterns, and incorporates new stream channels, riparian and buffer planting, public open spaces and stormwater reserves. Lower-intensity development, including large residential lots, is also located along parts of the Site’s outer edges to provide a transition between the more intensive residential areas and adjoining rural land. The LVA concludes that landscape mitigation will increasingly soften and integrate the development as planting establishes, with overall landscape and visual effects reducing towards Moderate over time. Accordingly, while the proposal will contribute to the ongoing modification of the rural-urban interface, its cumulative effects are appropriately managed so that the

Objective / Policy	Comment
	landscape and rural character values of the wider rural environment are not compromised, consistent with Policy 1A.8.6.
Policy 1A.8.7 Rural landscapes, rural character and associated amenity values should be retained by ensuring allotments are of sufficient size for rural land uses to predominate in rural areas.	The proposed Brymer development is considered generally consistent with the broader intent of Policy 1A.8.7, recognising that the proposal will result in a transition of the Site from predominantly rural land to a comprehensively planned residential environment and therefore will not retain rural land uses across the Site itself. The LVA (refer to Appendix 12) identifies the Site as a modified rural edge landscape adjoining Hamilton’s established urban area. While the Site retains local landscape values associated with pastoral openness, landform, wetlands, watercourses and its rural edge character, it is already influenced by adjoining residential development, roads, reserves and other urban-edge activities. The UDA (refer to Appendix 10) identifies a clear transition from established Hamilton residential development to the larger rural and rural-lifestyle properties west of the Site, characterised by dispersed buildings, pasture and substantial areas of open space. The masterplan responds through a graduated pattern of residential intensity, with more intensive housing focused around the neighbourhood centre, principal movement routes and public open spaces, and lower-intensity housing toward rural and other sensitive interfaces. In particular, the eight large lot residential lots form the lowest-intensity component and provide greater building separation, space for substantial planting and a more open built character, specifically assisting the transition between the urban neighbourhood and adjoining rural land. The wider blue-green and open-space network, including wetlands, stream corridors, reserves and riparian and boundary planting, further assists in moderating the prominence of built development and establishing a coherent urban edge. Accordingly, while the development will materially change the rural character of the

Objective / Policy	Comment
	Site itself, its density transition, lower-intensity rural edge, open-space network and landscape treatment appropriately manage its relationship with the adjoining rural environment and assist in limiting effects on surrounding rural landscape, character and amenity values.
4 Natural resources	
Policy 4.2.1 Physical, chemical and biological properties necessary for maintaining the life supporting capacity and productive use of the soil, especially high quality soil, are retained.	The proposed Brymer development is not directly consistent with Policy 4.2.1, as urbanisation and associated earthworks will permanently remove the productive use of soils within the developed parts of the Site, including the limited areas of high quality soil. However, the significance of this inconsistency is substantially reduced by the findings of the Soil and LUC Assessment and Rural Productivity Assessment (refer to Appendix 29). The Soil and LUC Assessment identifies only approximately 2.5 ha (3.2%) of the 81 ha Site as high class soil, with the remaining 96.8% not meeting the WDP-OiP definition. The high class soils occur as small, discrete areas that are not sufficiently large or cohesive to be managed separately from the surrounding lower-capability soils. Further, approximately 48% of the Site is subject to soil wetness limitations, which restrict long-term productive use, while other areas are constrained by topography and erosion risk. The Rural Productivity Assessment further demonstrates that these soil and land constraints, together with the Site's economic and locational constraints, materially limit the viability of ongoing productive rural use. Accordingly, while the proposal will not retain the productive use of the affected soils and is therefore inconsistent with Policy 4.2.1, the Site represents a more appropriate location to accommodate identified housing demand than land containing larger, cohesive areas of genuinely high quality soil with greater productive capacity and versatility. The proposal

Objective / Policy	Comment
Policy 4.2.2 The productive potential of soil, especially high quality soil, should not be compromised by activities that do not use or rehabilitate the productive capability of the soil or that adversely affect the physical, chemical and biological properties of the soil.	therefore assists, at a broader level, in directing urban growth away from more valuable productive soil resources. The proposed Brymer development is not directly consistent with Policy 4.2.2, as urbanisation of the Site will permanently remove the productive potential of soils within the development footprint, including the limited areas of high quality soil, and those soils will not be rehabilitated for productive rural use. However, the Soil and LUC Assessment (refer to Appendix 29) demonstrates that only approximately 2.5 ha (3.2%) of the Site meets the WDP-OiP definition of high class soil, with the remaining 96.8% not classified as high class soil. The identified high class soils occur in small, discrete areas and are not sufficiently large or cohesive to be practically managed separately from surrounding lower-capability land. Approximately 48% of the Site is also affected by soil wetness limitations, while other areas are constrained by topography and erosion risk, materially reducing the productive versatility of the land. The Rural Productivity Assessment (refer to Appendix 29) further demonstrates that alternative productive uses and management responses would not overcome the Site's physical and economic constraints, with wetness, drainage limitations and fragmented productive areas increasing costs and limiting yield potential. Accordingly, while the proposal is inconsistent with Policy 4.2.2, the productive potential being lost is materially constrained. In the context of identified housing demand, Brymer represents a more appropriate location for urbanisation than land containing larger, cohesive areas of genuinely high quality soil with greater productive capacity and long-term versatility, thereby assisting in the protection of more valuable productive land elsewhere.

Objective / Policy	Comment
Policy 4.2.3 Soil, especially high quality soil, should be available in its natural state and original location for future generations.	The proposed Brymer development is not consistent with the specific direction of Policy 4.2.3, as urbanisation will mean that soils within the development footprint will no longer remain in their natural state and original location for productive use by future generations. However, the Soil and LUC Assessment (refer to Appendix 29) demonstrates that the soil resource affected is of relatively limited productive value. Only approximately 2.5 ha (3.2%) of the Site meets the WDP-OiP definition of high class soil, with 96.8% not classified as high class soil. The high class soils occur in small, discrete areas that are not sufficiently large or cohesive to be practically managed separately, while approximately 48% of the Site is affected by soil wetness limitations that restrict long-term productive options. Accordingly, while the proposal will result in the permanent loss of the Site's soils for future rural production, the extent and productive significance of the high quality soil affected is limited. In the context of the Site's wider productive constraints and identified housing demand, Brymer represents a more appropriate location for urbanisation than land containing larger, cohesive areas of genuinely high quality and versatile soil. In this way, accommodating growth at Brymer assists at a broader level in retaining more valuable productive soil resources elsewhere for future generations.
Policy 4.2.4 Activities that do not utilise or rehabilitate the life supporting capacity and the productive capability of high quality soils should not locate on land containing high quality soils.	The proposed Brymer development is not consistent with the specific direction of Policy 4.2.4, as residential development does not utilise or rehabilitate the productive capability of high quality soils and will result in the permanent urbanisation of the limited areas of such soils within the Site. However, the Soil and LUC Assessment (refer to Appendix 29) provides important context as to the significance of this inconsistency. Detailed site-specific assessment

Objective / Policy	Comment
	identifies only approximately 2.5 ha (3.2%) of the Site as high class soil under the WDP-OiP definition, with the remaining 96.8% not meeting that definition. The identified high class soils are small and discrete rather than forming a large, cohesive productive resource, while substantial areas of the Site are affected by poor drainage, seasonal wetness, high water tables, topography and erosion limitations. The Rural Productivity Assessment (refer to Appendix 29) further demonstrates that reasonably practicable alternative productive uses, including arable, dairy/dairy support and horticultural activities, do not overcome the Site's constraints on economic viability. It concludes that the Site is unable to sustain economically viable land-based primary production and that the benefits of the proposed urban development outweigh the productive benefits reasonably capable of being derived from the Site. Accordingly, while the proposal is inconsistent with Policy 4.2.4, the amount and productive significance of high quality soil affected is limited. Given the identified housing demand, Brymer represents a more appropriate location for urbanisation than land containing larger and more cohesive areas of genuinely high quality and versatile soil, thereby assisting in the protection of more valuable productive land elsewhere.
Policy 4.2.5 Where high quality soil removal or disturbance cannot be avoided, the soil should be used to rehabilitate the land or enhance soils elsewhere to retain soil versatility and productive capacity.	The proposed Brymer development will require earthworks and disturbance of soils across the Site, including the limited areas identified as high class soil. The Soil and LUC Assessment (refer to Appendix 29) confirms that only approximately 2.5 ha (3.2%) of the Site meets the WDP-OiP definition of high class soil. These areas are small and discrete, are separated from larger cohesive areas of high class soil, and are not of sufficient scale to be managed differently from the surrounding lower-capability land.

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	Policy 4.2.5 is therefore principally relevant to the management of high quality soils disturbed during construction, rather than whether urban development should occur. The Earthworks Report (refer to Appendix 13) provides for topsoil to be stripped and stockpiled separately from structural and engineering fill, with material managed and reused through the staged earthworks programme. The wider earthworks strategy similarly seeks to maximise the beneficial reuse of material within the Site, including the reuse of cut material and imported preload material within subsequent stages of the development. Suitable high quality topsoil should therefore, to the extent practicable, be retained and beneficially reused within the development, including for landscaping, open space and ecological restoration, or otherwise used to enhance soils elsewhere where practicable. While the Earthworks Report provides a framework for the separation and reuse of topsoil, it does not specifically identify high quality soil or prescribe its ultimate reuse, and this can appropriately be addressed through detailed earthworks and soil management measures. Subject to appropriate measures being implemented to identify, retain and beneficially reuse suitable high quality soil disturbed by the works, the proposal is considered capable of achieving the intent of Policy 4.2.5.
Objective 4.4.1 Versatility and productive capability of rural land, especially that containing high quality soil and open space, is retained.	The proposed Brymer development is not directly consistent with Policy 4.4.1, as urbanisation will result in the permanent loss of the Site's rural land and its associated productive capability. However, the significance of this inconsistency is substantially reduced by the findings of the Soil and LUC Assessment and Rural Productivity Assessment (refer to Appendix 29). The Soil and LUC Assessment confirms that only approximately 2.5 ha (3.2%) of the Site meets the WDP-OiP definition of high class soil, with the remaining 96.8% not classified as high class soil. The identified high class soils occur as small, discrete

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	areas that are not sufficiently large or cohesive to be separately managed, while approximately 48% of the Site is affected by soil wetness limitations that restrict long-term productive options. The Rural Productivity Assessment further demonstrates that the Site's productive potential is constrained by its soils, fragmented landholdings, limited productive infrastructure and the relationship between land values and productive returns. It concludes that increasing the scale of pastoral farming, improved management, alternative productive uses or leasing would not materially overcome the Site's economic viability constraints. Accordingly, while the proposal will not retain the Site's rural productive capability and is therefore inconsistent with Policy 4.4.1, the productive resource being lost is materially constrained. Given the identified housing need, Brymer represents a more appropriate location for urbanisation than land containing larger, cohesive areas of genuinely high quality and versatile soils, thereby assisting in the broader retention of more productive rural land elsewhere.
Policy 4.4.3 Subdivision of rural land composed principally of small land holdings outside defined growth areas should be constrained to ensure rural land uses continue to predominate in these areas.	The proposed Brymer development is not consistent with the specific direction of Policy 4.4.3, as it involves subdivision of rural land outside a defined growth area for urban development, rather than constraining subdivision so that rural land uses continue to predominate. However, the proposal is materially different from the incremental subdivision of rural land into smaller rural or rural-residential holdings that the Policy seeks to discourage. Brymer is a comprehensively planned urban development adjoining Hamilton's established urban edge, rather than further fragmentation of the rural environment. The Rural Productivity Assessment (refer to Appendix 29) demonstrates that the existing pattern, size and shape of landholdings already constrain productive use. It

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	identifies irregularly shaped parcels, additional fencing and access requirements, poorly drained soils, limited productive infrastructure and land values that are disproportionately high relative to productive returns. It concludes that amalgamation or increasing the scale of pastoral farming would not materially improve economic viability. The Soil and LUC Assessment (refer to Appendix 29) also confirms that only approximately 2.5 ha (3.2%) of the Site comprises high class soil, with the remainder subject to varying productive limitations. Accordingly, while the proposal is inconsistent with Policy 4.4.3, constraining subdivision in order to retain the existing rural landholding pattern would provide limited productive benefit. Given the Site's constrained productive potential and immediate relationship with Hamilton, its comprehensive urban development represents a more efficient use of the land and assists in directing identified housing growth away from more productive rural land elsewhere.
Objective 4.8.1 Future urban development potential of Hamilton and other urban areas is not impeded.	The proposed Brymer development is considered consistent with Policy 4.8.1, as it will not impede the future urban development potential of Hamilton or surrounding urban areas. Rather, the proposal represents a logical extension of Hamilton's existing urban edge. The UDA (refer to Appendix 10) confirms that the Site directly adjoins established Hamilton neighbourhoods to the north and east, together with urban streets and Te Kootii Park, and is connected to the wider city through Brymer Road and SH23. Importantly, the masterplan has been designed to enable longer-term connections to adjoining land and the wider transport network, reducing the potential for the development to become an isolated or disconnected urban area. The UDA also identifies land between the Site and the established Hamilton urban area where further subdivision and urban development could potentially occur over time. A broader concept plan has been prepared to demonstrate how that land could

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	integrate with the future urban structure, rather than being sterilised or isolated by the Brymer development. The proposal therefore supports rather than impedes future urban development potential, establishing a coherent urban extension while retaining opportunities for future connectivity and integration with surrounding land. On this basis, the proposal is considered consistent with Policy 4.8.1.
Policy 4.8.2 Subdivision and building in the urban fringe should not compromise future urban development potential.	The proposed Brymer development is considered consistent with Policy 4.8.2, as the subdivision and development of the Site has been comprehensively planned so that it does not compromise the future urban development potential of the surrounding area. The UDA (refer to Appendix 10) identifies Brymer as occupying a distinct urban-edge position, directly adjoining established Hamilton neighbourhoods, urban streets and Te Kootii Park, and considers the proposal to form a logical physical continuation of the existing urban area. Importantly, the masterplan and movement network have been designed to provide for longer-term connections to adjoining land and the wider transport network, while remaining functional without reliance on those future connections. The transport planning has similarly sought to safeguard appropriate connections to adjoining areas so that future integration is not precluded. A broader concept plan has also been developed to consider how surrounding land could integrate with Brymer as urban development extends over time. Accordingly, rather than creating an isolated subdivision or establishing a layout that would constrain subsequent urbanisation, the proposal provides a coherent and connected framework capable of integrating with future development of adjoining land. The subdivision and building pattern therefore does not compromise future urban development potential and is considered consistent with Policy 4.8.2.

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Policy 4.8.3 Non-rural activities in the urban fringe should be avoided.	The proposed Brymer development is not consistent with the specific direction of Policy 4.8.3, as it introduces residential and associated non-rural activities within the urban fringe. However, the Site is not an isolated rural location. The UDA (refer to Appendix 10) identifies Brymer as occupying a distinct urban-edge position, directly adjoining established Hamilton neighbourhoods, urban streets and Te Kootii Park to the north and east. From an urban design perspective, the proposal represents a logical physical continuation of the existing urban area, with lower-intensity development providing a transition toward the remaining rural edge. The Rural Productivity Assessment (refer to Appendix 29) also demonstrates that retention of the Site for rural purposes would provide limited productive benefit. Existing landholding patterns, poorly drained soils, limited productive infrastructure and disproportionately high land values constrain viable rural production, and neither amalgamation, alternative productive uses nor leasing would overcome those long-term constraints. Conversely, the Economic Assessment (refer to Appendix 30) identifies strong and sustained housing demand across Hamilton and the lower Waikato market, with projected growth exceeding planned capacity and a potential long-term shortfall of approximately 16,700 dwellings. In this context, Brymer provides an opportunity to accommodate identified housing demand through a comprehensively planned extension of Hamilton on land with constrained productive potential, rather than through dispersed development across more productive rural land. Accordingly, while the proposal is inconsistent with Policy 4.8.3, its strategic urban-edge location, limited long-term rural productive potential and contribution to meeting identified housing demand provide a strong basis for the proposed non-rural use notwithstanding the Policy's direction.

Objective / Policy	Comment
Policy 4.8.4 Subdivision, use and development should be managed to ensure a predominance of open space within an urban fringe so that opportunities for urban-density expansion are retained.	The proposed Brymer development is considered generally consistent with the intent of Policy 4.8.4, although it will result in a transition from the existing predominantly open rural character to an urban environment. Importantly, the proposal is a comprehensively planned urban extension rather than ad hoc urban-fringe subdivision that could constrain the efficient future development of the wider area. The UDA and LVA (refer to Appendices 10 and 12) demonstrate that substantial open space is integrated throughout the masterplan as part of a connected blue-green network. Existing wetlands and watercourses are integrated with stormwater management areas, ecological offset areas and associated planting, while the proposal includes two public parks, two recreation reserves and 14 stormwater reserves. These areas provide amenity and recreation opportunities while maintaining meaningful areas of openness within the development. Importantly, the masterplan has also been designed to retain opportunities for future urban expansion and integration, including through movement connections that can extend into adjoining land. The project team has specifically considered the relationship between Brymer and future development of surrounding land, including connectivity, infrastructure and the wider growth context. Accordingly, while the Site will no longer retain a predominance of rural open space, the proposal does not compromise the underlying purpose of the Policy, being to preserve opportunities for efficient future urban-density development. Rather, Brymer establishes a coherent urban framework with substantial integrated open space while retaining opportunities for adjoining land to urbanise and connect efficiently in the future.
5 Natural Hazards	

Objective / Policy	Comment
Objective 5.2.1 Risks from natural hazards to health, safety and property, resulting from use, development or protection of land, are minimised.	The proposed Brymer development is considered consistent with Objective 5.2.1. The natural hazards relevant to the Site have been comprehensively investigated through the GIR, GEMP, hydrogeological assessment and stormwater and flood modelling. These assessments identify the principal risks as including flooding and overland flow, liquefaction, compressible soils and associated settlement or subsidence, shallow groundwater and localised slope instability. The proposed development incorporates appropriate engineering and design responses to minimise these risks to people and property. Geotechnical measures include preloading and consolidation of compressible soils, engineered fill, appropriate foundation and slope design, groundwater and settlement monitoring and further detailed geotechnical assessment where required. Flood risk is addressed through an integrated stormwater system incorporating attenuation and flood storage, controlled outlets and designated overland flow paths, with climate-change-adjusted hydraulic modelling informing the design. Accordingly, the identified natural hazards do not preclude development of the Site and can be appropriately managed through the proposed design, engineering, monitoring and mitigation measures. These measures will minimise risks to the health and safety of future residents, neighbouring properties and infrastructure and are therefore consistent with Objective 5.2.1.
Policy 5.2.2 Use or development of land subject to significant natural hazards should be avoided.	The proposed Brymer development is considered consistent with the intent of Policy 5.2.2. While the specialist investigations identify a range of natural hazards relevant to the Site, including flooding and overland flow, liquefaction susceptibility, compressible soils and associated settlement or subsidence, shallow groundwater and localised slope instability, these constraints have been comprehensively

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	assessed and are not considered to represent hazards that preclude development where the recommended mitigation measures are implemented. The proposed development has been specifically designed to respond to these constraints. Geotechnical risks will be managed through measures including preloading and consolidation of compressible soils, engineered fill, appropriate foundation and slope design, and groundwater and settlement monitoring. Flood and overland flow risks are addressed through the proposed landform and integrated stormwater system, including attenuation and flood storage, controlled discharge and designated overland flow paths. The stormwater design has also been informed by climate-change-adjusted hydraulic modelling to ensure that development does not exacerbate flood risk or transfer additional risk to adjoining properties. Accordingly, although the Site is subject to identified natural hazard constraints, the specialist assessments demonstrate that these can be appropriately avoided or mitigated through engineering design and management such that the proposed development does not expose people or property to unacceptable natural hazard risk. On this basis, the proposal is considered consistent with the intent of Policy 5.2.2.
Policy 5.2.3 Use, development or protection of land should not increase the adverse effects of natural hazards, or compromise natural processes.	The proposed Brymer development is considered consistent with Policy 5.2.3. The specialist assessments demonstrate that the development has been designed so that it does not materially increase existing natural hazard risks to the Site or surrounding properties. Flood and overland flow risks are addressed through the integrated stormwater system, including attenuation and flood storage, controlled discharge and retention of appropriate overland flow paths. Climate-change-adjusted hydraulic modelling has informed the design to ensure that post-

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	development runoff is appropriately managed and that flood risk is not transferred or exacerbated downstream. The development also responds to the Site's geotechnical constraints, including compressible soils, shallow groundwater, liquefaction susceptibility and localised slope instability. These risks will be managed through ground improvement, engineered fill, appropriate foundation and slope design, and groundwater and settlement monitoring. Importantly, the hydrological and stormwater response seeks to maintain underlying natural processes where practicable, including groundwater recharge and the hydrological functioning of retained wetlands and watercourses. On-lot soakage is proposed where appropriate, while treated stormwater will be directed to retained wetlands and streams where necessary to maintain their hydrological regime. Accordingly, while development will necessarily modify the existing landform and drainage environment, the proposed engineering, stormwater and ecological measures ensure that natural hazard effects are not increased and that important hydrological and ecological processes are maintained or appropriately accommodated. The proposal is therefore considered consistent with Policy 5.2.3.
Policy 5.2.5 Development should minimise impervious surfaces, provide adequate stormwater drainage, and mitigate the off-site effects of stormwater drained from the site.	The proposed Brymer development is considered consistent with Policy 5.2.5. While the proposed urban development will necessarily increase impervious surfaces relative to the existing rural land use, the masterplan incorporates an extensive blue-green network of wetlands, watercourses, stormwater reserves and other open spaces, together with on lot soakage and retention where practicable, to reduce and manage runoff generated by development. The SMP and Infrastructure Report (refer to Appendix 13 and 14) provide a comprehensive stormwater management system incorporating at-source

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	management, treatment, attenuation and controlled discharge. Constructed wetlands will provide water quality treatment, extended detention and flood storage, while the primary drainage network and designated overland flow paths provide for safe conveyance of larger storm events. The system has been informed by hydraulic modelling, including climate change adjusted rainfall events, and is designed to appropriately manage post-development peak flows and avoid exacerbating flooding on neighbouring or downstream properties. Accordingly, although impervious coverage will increase as a consequence of urbanisation, the proposal incorporates appropriate measures to minimise and manage its effects, provides adequate stormwater drainage and mitigates off-site water quantity, flooding, erosion and water quality effects. The proposal is therefore considered consistent with Policy 5.2.5.
Policy 5.2.9 Development should be designed and located to avoid or mitigate the predicted effects of global climate change on natural hazards, especially increased flooding, erosion, fire, and storms. Where there is incomplete information, a precautionary approach should be taken.	The proposed Brymer development is considered consistent with Policy 5.2.9. The potential for climate change to exacerbate natural hazards has been expressly considered in the design of the development, with increased rainfall and associated flooding representing the principal climate related hazard relevant to the Site. The SMP (refer to Appendix 14) adopts climate change adjusted rainfall based on the RCP8.5 scenario for 2100–2120, including assessment of the 2, 10 and 100 year events and an approximately 4°C climate change allowance. This provides a suitably conservative basis for assessing future flood conditions and reflects a precautionary approach to uncertainty regarding future climate effects. The resulting hydraulic modelling has informed the proposed landform and stormwater system, including constructed wetlands, attenuation and flood storage, controlled outlets and designated overland flow paths. The modelling considers existing and post-development conditions together with the wider downstream

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	Ohote Basin Drainage Scheme and climate-change-adjusted Waipā River levels, thereby accounting for potential cumulative and downstream flood effects. Accordingly, Brymer has been designed having regard to predicted climate change effects and incorporates appropriate resilience to increased rainfall, flooding and storm events. Where uncertainty remains, conservative climate assumptions and appropriate capacity within the stormwater system provide a precautionary response. The proposal is therefore considered consistent with Policy 5.2.9.
6 Built Environment	
Objective 6.2.1 Development that is connected or grouped around infrastructure.	The proposed Brymer development is considered consistent with Objective 6.2.1, as it is a comprehensively planned urban development in which land use, transport and three-waters infrastructure have been planned and staged in an integrated manner. The Infrastructure Report (refer to Appendix 13) confirms that the development will be supported by the necessary transport and three-waters infrastructure, including connections to the IAWAI reticulated water and wastewater networks, internal reticulation, and an integrated stormwater management system incorporating treatment, attenuation and conveyance measures. The infrastructure strategy has been developed alongside the masterplan and staging programme so that infrastructure can be progressively delivered as development occurs. The Infrastructure Report records consultation with HCC and IAWAI regarding strategic water and wastewater servicing, including consideration of alternative connection options and existing network constraints. This has informed the proposed servicing strategy, including staged connections to the existing water network and the preferred wastewater connection to the Western Interceptor via Grandview Road.

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	The UDA (refer to Appendix 10) further demonstrates integration between development and infrastructure through a connected street hierarchy linked to the existing Hamilton movement network, provision for future connections to adjoining land, and integration of wetlands, watercourses and stormwater areas within the wider blue-green network. Accordingly, Brymer represents development that is planned and connected around the infrastructure necessary to support it, consistent with Objective 6.2.1. I think that is more robust than the current draft without becoming materially longer. The main improvement is the reference to the actual strategic servicing work with HCC/IAWAI and the preferred wastewater connection, which gives the conclusion a firmer evidential basis.
Policy 6.2.2 Subdivision or development should be located, and have a density, scale and intensity, to ensure efficient use of land, public facilities and utilities.	The proposed Brymer development is considered consistent with Policy 6.2.2, as its location, density and scale provide for the efficient use of land and support the effective provision and use of public facilities and utilities. The proposal is a comprehensively planned urban extension adjoining Hamilton and will provide approximately 1,043 dwellings, including a range of detached, terrace and apartment housing, together with neighbourhood-scale commercial activities and supporting open space and infrastructure. The UDA (refer to Appendix 10) demonstrates that density is distributed purposefully across the Site, with apartments and terrace housing generally concentrated around the neighbourhood centre, public open spaces and key movement routes. This approach makes efficient use of developable land while placing greater residential intensity where residents have convenient access to local services, recreation and the movement network. The development also connects

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	with existing reserves, including Te Kootii Park, and the wider Hamilton open-space and transport networks. The Infrastructure Report (refer to Appendix 13) confirms that the development will be serviced through integrated transport and three-waters infrastructure, with water and wastewater connecting to the IAWAI networks and infrastructure progressively established as development is staged. Stormwater infrastructure is also integrated with the Site's wetlands, watercourses and open-space network. Overall, the density, scale and integrated layout of Brymer support efficient use of the land resource, existing and proposed public facilities, and infrastructure investment, and the proposal is therefore considered consistent with Policy 6.2.2.
Policy 6.2.3 Residential and business development should occur in current towns and villages in preference to isolated rural locations.	The proposed Brymer development is considered consistent with the intent of Policy 6.2.3. While the Site is presently rural land and sits outside the existing Hamilton City boundary, it is not an isolated rural location. The UDA (refer to Appendix 10) identifies the Site as occupying a distinct urban-edge position, directly adjoining established Hamilton neighbourhoods to the north and east, urban streets and Te Kootii Park, with connections to the wider city through Brymer Road and SH23. From an urban design perspective, the proposal represents a logical physical continuation of the adjoining Hamilton urban area. The proposal will establish a comprehensively planned residential neighbourhood rather than a disconnected rural settlement. The masterplan provides approximately 1,043 dwellings across a range of housing typologies, together with mixed-use/neighbourhood-serving activities that provide a local activity focus and support residents' day-to-day needs. It also provides for longer-term connections to adjoining land and the wider transport network, reducing the potential for the development to become isolated.

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	The Economic Assessment (refer to Appendix 30) further identifies Brymer as contributing to housing supply and choice within the Hamilton urban area, in response to strong growth pressures and housing demand across Hamilton and the lower Waikato market. Accordingly, although technically located on rural-zoned land, Brymer is appropriately characterised as a contiguous extension of the existing Hamilton urban area rather than development in an isolated rural location. The proposal therefore accords with the underlying direction of Policy 6.2.3 to concentrate residential and business development in and around established urban areas.
Policy 6.2.4 Ribbon development should be avoided.	The proposed Brymer development is considered consistent with Policy 6.2.4, as it does not represent ribbon development. Rather than establishing a narrow or linear pattern of development extending along a transport corridor into the rural environment, Brymer is a comprehensively planned and spatially coherent urban extension adjoining Hamilton's existing urban area. The UDA (refer to Appendix 10) identifies the Site as occupying a distinct urban-edge position, adjoining established Hamilton neighbourhoods to the north and east and rural land to the south and west. It concludes that the proposal represents a logical physical continuation of the adjoining urban area rather than an isolated rural development. The masterplan establishes a complete neighbourhood structure comprising a range of residential densities, a neighbourhood centre, public open spaces and an integrated movement network, rather than development concentrated solely along Brymer Road or SH23. The proposal also consolidates approximately 1,000 dwellings within a defined and integrated development area, supported by a hierarchy of collector and local roads, pedestrian connections, reserves and stormwater infrastructure. This compact and

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	coordinated form avoids the inefficient linear extension of urban activities along existing roads that the Policy seeks to prevent. Accordingly, the proposal does not constitute ribbon development and is considered consistent with Policy 6.2.4
8 Land Transport Network	
Objective 8.2.1 An integrated, safe, responsive and sustainable land transport network is maintained, improved and protected.	The proposal is consistent with Objective 8.2.1 as it delivers an integrated transport network that accommodates all transport modes and is designed to support the safe, efficient and sustainable movement of people and goods. The ITA (refer to Appendix 16) concludes that the development can be accommodated within the existing and planned transport network without unacceptable adverse effects on network safety or efficiency, subject to the proposed staging and mitigation measures. The proposal incorporates a connected network of collector and local roads, footpaths on all streets, bi-directional cycleways and shared paths, multiple connections to surrounding neighbourhoods, and provision for future public transport services. These measures support a well-connected and accessible transport environment while promoting transport choice and reducing reliance on private vehicles. The proposal also maintains and protects the operation of the wider transport network through the staged delivery of infrastructure and appropriately designed access arrangements. In particular, the development is subject to a staged access framework that links growth to transport capacity, including the requirement that development beyond approximately 200 dwellings reliant on the Grandview Road connection cannot occur until the SH23 access is constructed and operational. The ITA demonstrates that transport effects can be appropriately managed through infrastructure provision, intersection upgrades, monitoring and construction traffic

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	management measures, while recognising and maintaining the strategic role of SH23 as an important regional transport and freight corridor. Accordingly, the proposal maintains, improves and protects the land transport network by delivering infrastructure that is integrated, safe, responsive to growth demands and supportive of sustainable transport outcomes.
Policy 8.2.2B Subdivision, use and development should be in a location and at a scale that (a) is consistent with the existing or planned capacity and design of the roading network, and (b) (aa) is consistent with the intended function of any roads that may be affected by the subdivision, use and development (roading hierarchy), and (c) does not compromise the safety and efficiency of the roading network, and (d) does not compromise the safety and efficiency of the railway network.	The proposal is consistent with Policy 8.2.2B as the scale and location of the development have been assessed against the capacity and function of the surrounding transport network through the ITA. The ITA notes that the development can be accommodated within the existing and planned transport network without unacceptable adverse effects on network safety or efficiency, subject to the proposed staging, infrastructure delivery and mitigation measures. Transport modelling demonstrates little or no material change in strategic network performance at the 2035 and 2045 assessment horizons, with the wider network capable of accommodating the development when considered alongside the planned access and infrastructure upgrades. The proposal is also consistent with the intended function of the surrounding road hierarchy. Development traffic is directed primarily to roads intended to accommodate growth, including Grandview Road, Brymer Road and SH23, while impacts on surrounding local residential streets are generally minor. A staged access framework ensures that development proceeds in line with available transport capacity, including the requirement that development beyond approximately 200 dwellings reliant on the Grandview Road connection cannot occur until the SH23 access is constructed and operational. The ITA concludes that all site access intersections operate at acceptable levels of service and that the safety and efficiency of the transport network will be maintained.

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	The proposal does not affect the safety or efficiency of the railway network. No new rail crossings are proposed, the development does not adjoin the rail corridor, and the ITA identifies no adverse effects on existing or planned rail infrastructure. Accordingly, the proposal is consistent with Policy 8.2.2B.
Policy 8.2.3 The integrated, safe, responsive and sustainable operation of the land transport network should be promoted through: (a) carriageway, intersection and site design (b) appropriate siting of and access for traffic generating activities (c) traffic management, signage, road marking, lighting, and rest areas and parking as appropriate (d) provision for pedestrians, cyclists and the disabled, including off road routes and connections including pedestrian malls (e) provision of public transport (f) provision for network utilities (g) appropriate access for existing land uses (h) railway crossing design.	The proposal is consistent with Policy 8.2.3 as it promotes the integrated, safe, responsive and sustainable operation of the transport network through a comprehensively planned transport framework that incorporates appropriately designed roads, intersections, access arrangements, active transport facilities and provision for future public transport. The development can be accommodated within the existing and planned transport network without unacceptable adverse effects on network safety or efficiency, subject to the proposed staging and mitigation measures (refer to Appendix 16). In particular, the proposal provides a connected hierarchy of collector and local roads, with intersections and access points designed to safely accommodate anticipated traffic volumes while directing development traffic to roads intended to accommodate growth, including Grandview Road, Brymer Road and SH23. The proposed access strategy has been tested through transport modelling and includes staged infrastructure delivery to ensure network capacity is available as development progresses. Traffic management measures, speed management, lighting, parking provision, monitoring requirements and recommended construction traffic management measures further support the safe and efficient operation of the network. The proposal also promotes transport choice and accessibility through the provision of footpaths on all streets, bi-directional cycleways and shared paths on collector roads, connections to adjoining neighbourhoods and reserves, and roads designed with bus-capable geometry and provision for future bus stop infrastructure. The

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	transport network is integrated with the wider subdivision infrastructure, including stormwater, water supply, wastewater and utility services, and has been designed to accommodate emergency service vehicles, servicing and freight movements. No railway crossings are proposed or affected by the development. Accordingly, the proposal gives effect to Policy 8.2.3 by promoting an integrated and multi-modal transport network that safely and efficiently supports the development and the wider transport system.
Policy 8.2.4 Subdivision and development should not obstruct future road linkages including access to adjoining land and to Hamilton City where relevant.	The proposal is consistent with Policy 8.2.4 as it has been designed to provide a connected and integrated transport network that facilitates, rather than obstructs, future road linkages and access to adjoining land. The internal road network is a legible, connected, grid-influenced layout supported by a collector road network, local roads and multiple connections to the surrounding transport network (refer to Appendix 16). Access is proposed from SH23, Grandview Road, Harrogate Place and O'Brien Road, with the ultimate transport network linking the SH23 and Grandview Road connections through an internal collector road system. The proposal also incorporates multiple pedestrian and cycle connections to surrounding neighbourhoods, reserves and future urban areas, including Grandview Heights and Western Heights, and has been designed to integrate with the wider transport network serving the western Hamilton growth area. Collector roads are designed to accommodate future public transport services and provide connectivity beyond the site boundaries. The ITA confirms that development traffic will be distributed through the planned road network and that the proposal supports the broader transport framework anticipated for the surrounding area. Accordingly, the proposal does not hinder future road connections or access opportunities for adjoining land. Instead, it establishes a transport framework that

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Policy 8.2.5 Subdivision, use and development should be located and designed to connect safely to an existing road.	promotes connectivity with surrounding communities and Hamilton City and supports the integrated development of the wider growth area. The proposal is consistent with Policy 8.2.5 as the subdivision has been designed to connect safely and efficiently to the existing road network through a series of planned and assessed access points. The ITA (refer to Appendix 16) identifies four access connections to the surrounding network via O'Brien Road, Harrogate Place, Grandview Road and SH23, with each access designed having regard to the function and capacity of the receiving road. Detailed transport modelling confirms that the development can be accommodated within the existing and planned transport network without unacceptable adverse effects on network safety or efficiency. The proposed access arrangements have been subject to both strategic and intersection-level assessment. The Grandview Road connection and SH23 access have been modelled and assessed to ensure safe and efficient operation, while the staged access framework links development growth to the provision of transport infrastructure. In particular, development beyond approximately 200 dwellings reliant on the Grandview Road connection cannot occur until the SH23 access intersection has been constructed and is operational. The ITA concludes that all site access intersections operate at acceptable levels of service and that development traffic is appropriately distributed onto roads intended to accommodate growth. The proposal also provides for safe access by pedestrians, cyclists, public transport, service vehicles and emergency services through an integrated internal transport network comprising collector and local roads, footpaths, cycleways and shared paths. Accordingly, the subdivision has been located and designed to connect safely to the existing road network and is therefore consistent with Policy 8.2.5.
9 Contaminated Land	

Objective / Policy	Comment
Objective 9.2.1 Human health or the environment is not harmed by the use or development of contaminated land.	The proposed Brymer development is considered consistent with Objective 9.2.1. The DSI (refer to Appendix 21) identifies localised areas of soil contamination associated with historic activities on the Site, which will be remediated and managed in accordance with the RAP-CSMP. This includes appropriate excavation and disposal of contaminated soils, controls to protect workers and the surrounding environment during earthworks, and validation sampling to confirm that remaining soils are suitable for the proposed residential use. Accordingly, the identified contamination can be appropriately managed so that the development does not result in unacceptable risks to human health or the environment, consistent with Objective 9.2.1.
Policy 2.2.2 Sensitive activities, such as residential, educational, recreational or childcare activities, should not locate on contaminated land.	The proposed Brymer development is considered consistent with the intent of Policy 2.2.2. While localised areas of contamination have been identified within the Site, these areas will be remediated and managed in accordance with the RAP-CSMP (refer to Appendix 22) before being used for sensitive residential activities. Contaminated soils will be appropriately excavated and disposed of, with validation sampling undertaken to confirm that remaining soils are suitable for the proposed residential land use. Accordingly, sensitive activities will not be established on land that remains contaminated at levels presenting an unacceptable risk to human health.
Policy 9.2.3 Prior to a change of use or redevelopment of contaminated land, remediation to make the site suitable for the proposed use or redevelopment must be undertaken.	The proposed Brymer development is considered consistent with Policy 9.2.3. The DSI (refer to Appendix 21) identifies localised areas of contamination that will require remediation before the land is developed for residential use. Remediation will be undertaken in accordance with the RAP-CSMP (refer to Appendix 22), including excavation and appropriate disposal of contaminated soils and subsequent validation sampling to confirm that the affected areas are suitable for their intended

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	use. Accordingly, contaminated areas will be appropriately remediated prior to redevelopment, consistent with Policy 9.2.3.
Policy 9.2.4 Remediation of contaminated land should not pose a more significant risk to human health or the environment than if remediation had not occurred.	The proposed Brymer development is considered consistent with Policy 9.2.4. Remediation of the identified localised contamination will be undertaken in accordance with the RAP-CSMP (refer to Appendix 22), which establishes appropriate procedures for excavation, handling, transport and disposal of contaminated soils, together with controls to protect workers, surrounding land and the environment during the works. Validation sampling will confirm that remediation has achieved appropriate standards for the proposed residential use. Accordingly, the remediation works will be undertaken in a controlled manner that avoids creating greater risks to human health or the environment than the existing contamination.
Policy 9.2.5 Material removed from contaminated land should be disposed of in a manner that avoids further adverse effects on human health or on the environment.	The proposed Brymer development is considered consistent with Policy 9.2.5. The RAP-CSMP (refer to Appendix 22) provides for contaminated soils excavated from the identified areas to be appropriately handled, transported and disposed of at a suitably licensed facility authorised to accept material with the identified contaminant concentrations. These measures will ensure that contaminated material removed from the Site is managed in a controlled manner that avoids further adverse effects on human health or the environment, consistent with Policy 9.2.5.
11 Social, Cultural and Economic Wellbeing	
Objective 11.2.1 Towns, villages, neighbourhoods and localities have social coherence and a sense of place.	The proposed Brymer development is considered consistent with Objective 11.2.1. The comprehensively planned masterplan will establish a coherent new neighbourhood structured around a neighbourhood centre, connected street and walking/cycling network, and an extensive system of public open spaces, wetlands and blue-green corridors. A range of housing typologies and densities will support a

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	diverse community, while the integration of natural features, recreation areas and pedestrian connections will provide opportunities for social interaction and contribute to a distinctive local identity. Collectively, these elements will support the establishment of a well-connected community with a strong sense of place.
Objective 11.2.7 Valued social and cultural characteristics of communities are retained.	The proposed Brymer development is considered consistent with Objective 11.2.7, as it has been designed as a comprehensively planned neighbourhood that integrates with and builds upon the valued social characteristics of the adjoining Hamilton communities. The UDA (refer to Appendix 10) identifies the Site's direct relationship with the established Grandview Heights and Western Heights neighbourhoods and recognises opportunities to connect the development with existing streets, parks and surrounding amenities. The proposal supports community wellbeing through the provision of a range of housing typologies, enabling greater housing choice for different households, together with a neighbourhood centre providing local services and amenities. The masterplan also provides an integrated network of public open spaces, walking and cycling connections and ecological areas, with connections to existing facilities such as Te Kootii Park and the wider open-space network. These features will provide opportunities for recreation, social interaction and community connection, assisting in establishing a strong local identity and liveable neighbourhood. The proposal will also provide broader social and economic benefits through increased housing supply, employment and local economic activity. The economic assessment identifies substantial construction-related employment and expenditure benefits, together with ongoing household expenditure and employment associated with the neighbourhood centre.

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	Overall, Brymer will integrate with existing communities while establishing a connected new neighbourhood with its own local services, open spaces and opportunities for social interaction. On this basis, the proposal is considered consistent with Objective 11.2.7.
Policy 11.2.8 Activities should meet the needs of individuals and groups and be sensitive to the existing social and cultural characteristics of communities.	The proposed Brymer development is considered consistent with Policy 11.2.8, as it provides for the needs of a diverse range of future residents while responding sensitively to the social and cultural characteristics of the surrounding community. The UDA (refer to Appendix 10) confirms that the proposal provides approximately 1,043 dwellings across a range of lot sizes, densities and housing typologies, including detached dwellings, duplexes, terrace housing and apartments. This provides greater housing choice to meet differing household needs, circumstances and preferences, including smaller and potentially more affordable housing options. The masterplan also supports the day-to-day social needs of residents through a neighbourhood centre, public parks, open spaces and an integrated walking and cycling network, while connecting with established neighbourhoods, Te Kootii Park and surrounding amenities. The distribution of housing also responds to existing community interfaces, with lower-intensity detached housing generally located adjoining established residential and rural properties. Importantly, the Cultural Impact Assessment (refer to Appendix 24) recognises the cultural values of Ngāti Māhanga as mana whenua and identifies measures required to appropriately respond to cultural effects, including the protection of the mauri and ecological function of wetlands and connected waterways and ongoing mana whenua involvement. Overall, the proposal provides for housing choice, local services, recreation, accessibility and community interaction, while responding to existing residential

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	interfaces and identified mana whenua values. It is therefore considered consistent with Policy 11.2.8.
Objective 11.6.1 People and communities are able to access resources so that they can provide for their economic wellbeing.	The proposed Brymer development is considered consistent with Objective 11.6.1, as it will increase access to housing, employment, local services and infrastructure that enable people and communities to provide for their economic wellbeing. The development will deliver a substantial increase in housing supply and choice, while the proposed neighbourhood centre will provide opportunities for local employment, goods and services within the development. The Economic Assessment (refer to Appendix 30) identifies significant economic benefits arising from the proposal. The development is estimated to generate approximately \$720 million in GDP and \$428 million in wages and salaries, while supporting the equivalent of more than 500 full-time jobs during construction. Once developed, the neighbourhood centre will support ongoing employment, while future residents are estimated to generate more than \$123 million in annual household expenditure, supporting businesses and employment within the wider local economy. The proposal also represents a more economically beneficial use of the Site than its existing rural use. The Rural Productivity Assessment (refer to Appendix 29) identifies substantial physical and economic constraints affecting viable land-based primary production and concludes that the economic and social benefits of urban development outweigh the productive benefits reasonably capable of being derived from the Site. Overall, Brymer will increase housing supply, support employment and local business activity, and generate substantial expenditure and wider economic activity, enabling people and communities to access resources and opportunities that

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	support their economic wellbeing. The proposal is therefore consistent with Objective 11.6.1.
Policy 11.6.2 Community economic wellbeing should be enabled through activities that use and develop natural and physical resources without adverse effects on the local environment.	The proposed Brymer development is considered consistent with Objective 11.6.2, as it enables substantial community economic benefits through the development of land and infrastructure while incorporating measures to appropriately manage adverse effects on the local environment. The Economic Assessment (refer to Appendix 30) identifies significant benefits arising from the proposal, including approximately \$720 million in GDP, \$428 million in wages and salaries and the equivalent of more than 500 full-time jobs during construction. Once developed, the neighbourhood centre will support ongoing employment, while future residents are estimated to contribute more than \$123 million in annual household expenditure to the local economy. The Rural Productivity Assessment (refer to Appendix 29) also concludes that these benefits outweigh the productive benefits reasonably capable of being derived from the Site, having regard to its physical and economic constraints. At the same time, the proposal has been designed to manage its environmental effects. The development incorporates an integrated network of wetlands, watercourses, stormwater reserves, landscaped areas, retained vegetation and public open space, together with ecological mitigation and offsetting to protect, restore and enhance ecological values. The specialist assessments and proposed conditions provide an integrated framework to avoid, remedy or mitigate adverse effects associated with earthworks, transport, stormwater, ecology, landscaping and infrastructure. Accordingly, Brymer enables significant economic and community wellbeing benefits while appropriately managing the environmental effects associated with

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	developing the Site's natural and physical resources, and is considered consistent with Objective 11.6.2.
Policy 11.6.8 Subdivision, use and development in rural areas should not compromise access to resources needed for economic activity, especially resources of a fixed or finite nature, including land, (particularly that used for productive agricultural and farming activities), soil, water, minerals, and the open space that provides separation from sensitive activities.	The proposed Brymer development is not directly consistent with Objective 11.6.8 insofar as urbanisation will permanently remove the Site's land and soil resources from productive rural use. However, the significance of that inconsistency is substantially reduced by the findings of the Soil and LUC Assessment and Rural Productivity Assessment (refer to Appendix 29). The Soil and LUC Assessment confirms that only approximately 2.5 ha (3.2%) of the Site meets the WDP-OiP definition of high class soil, with 96.8% not classified as high class soil. The high class soils occur as small, discrete areas that are not sufficiently large or cohesive to be separately managed, while approximately 48% of the Site is subject to soil wetness limitations that materially restrict long-term productive options. The Rural Productivity Assessment similarly identifies physical, economic and locational constraints affecting the viability of ongoing land-based primary production. The proposal has also been designed to avoid unnecessarily constraining rural resources beyond the Site. The interface with adjoining rural land is managed through the development layout, open space and landscape treatment, while the comprehensive urban form avoids dispersed rural-residential development that could generate a wider pattern of fragmentation and reverse sensitivity effects. Accordingly, while the Site itself will no longer be available for productive rural activity, the productive resource being lost is materially constrained. In the context of identified housing demand, concentrating urban development at Brymer represents a more appropriate use of this urban-edge land than development of larger, cohesive areas of genuinely productive rural land elsewhere, thereby

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	assisting in retaining access to those more valuable finite resources for future economic activity. This conclusion is further supported by the Rural Productivity Assessment, which finds that the Site is unable to sustain economically viable land-based primary production, even under its highest and best reasonably practicable productive use, and that there are no reasonably practicable options available to overcome the identified constraints. Importantly, AgFirst concludes that the benefits of the proposed urban development outweigh the productive benefits currently derived, or reasonably capable of being derived, from the Site, and that urban development represents a substantially more efficient and beneficial use of the land resource. This is consistent with the Economic Assessment, which similarly identifies significant housing and wider economic benefits from urbanisation relative to the comparatively limited economic value associated with retaining the Site in rural production.
13 Amenity Values	
Objective 13.2.1 Adverse effects of activities on amenity values are managed so that the qualities and character of the surrounding environment are not unreasonably compromised.	The proposed Brymer development is considered consistent with Objective 13.2.1. While the proposal will result in a permanent change from an open rural landscape to an urban residential environment, the relevant issue is whether that change unreasonably compromises the qualities and character of the surrounding environment. The LVA (refer to Appendix 12) recognises the Site as a modified rural-edge landscape immediately adjoining Hamilton’s established urban area and considers the proposal as a comprehensively planned extension of that existing settlement pattern. The UDA (refer to Appendix 10) demonstrates that amenity has been an important consideration in the development of the masterplan. The urban design principles seek to integrate wetlands, watercourses and stormwater areas into a connected blue-green network that contributes to neighbourhood amenity; locate higher-

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	density housing in appropriate relationships with the neighbourhood centre, movement routes, parks and open spaces; and manage interfaces with existing residential and rural properties through the distribution and scale of development and appropriate interface treatments. The UDA also identifies the importance of achieving appropriate on-site amenity, privacy, outlook and daylight, together with attractive, safe and well-overlooked streets and public spaces. These outcomes are reinforced through the proposed Residential Design Guidelines, which address matters including building design, garage treatment, public-space interfaces, lighting, front-yard landscaping, fencing and planting. The LVA similarly confirms that the masterplan responds to amenity effects through the distribution and scale of development, treatment of Site boundaries and integration of a substantial blue-green and open-space network. Lower-intensity development is used along sensitive rural interfaces to provide greater building separation, openness and opportunities for planting, while wetlands, watercourses, parks and stormwater reserves establish a strong landscape framework throughout the development. Amenity effects associated with noise have also been specifically assessed. The Acoustic Assessment (refer to Appendix 27) concludes that the proposed noise framework will provide an acoustic amenity consistent with, or slightly better than, permitted residential noise levels, while dwellings affected by the SH23 Noise Control Boundary can achieve the required internal noise standards through standard construction measures. Construction noise and vibration will also be managed through the proposed CNVMP. Overall, although the character of the Site itself will change, the comprehensive urban design response, landscape framework, interface treatments and specialist mitigation measures ensure that both internal residential amenity and the amenity

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	values and character of the surrounding environment are appropriately managed and will not be unreasonably compromised. The proposal is therefore considered consistent with Objective 13.2.1.
Policy 13.2.2 Adverse effects associated with lighting, litter, electromagnetic radiation, vermin, traffic, spray drift, and noise should be contained within the site where they are generated.	There is no electromagnetic radiation, vermin or spray drift anticipated to arise from the proposed development. In relation to lighting, the development will introduce urban lighting associated with dwellings, streets, pedestrian routes, shared accessways, public spaces and the neighbourhood centre. The UDA and Residential Design Guidelines (refer to Appendix 10 and Appendix 9) provide a framework for managing lighting as part of the overall design response. Exterior lighting is to support safety, legibility and ease of movement while minimising glare, light spill and adverse effects on neighbouring properties and the public realm. The Design Guidelines specifically encourage low-level, low-intensity and shielded lighting, together with fittings such as hoods, louvres and shields to direct light downward, and discourage exposed floodlights, bright bulbs and poorly directed fittings. Lighting to rear lanes, pedestrian paths and shared accessways is also to be positioned to improve safety and visibility while avoiding unnecessary spill into habitable rooms and private outdoor spaces. Accordingly, lighting effects can be appropriately contained and managed within the development, including at interfaces with adjoining residential and rural properties. In relation to traffic, the development will generate additional vehicle movements on the surrounding transport network and these effects cannot be entirely contained within the Site. However, the transport effects of the development have been comprehensively assessed through the ITA (refer to Appendix 16), which concludes that the development can be accommodated within the existing and planned transport network without unacceptable adverse effects on network safety or efficiency, subject to the proposed staging, monitoring and mitigation measures.

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	The development provides a connected hierarchy of collector and local roads, together with footpaths, cycleways, shared paths and provision for future public transport services. Traffic generated by the development is directed to roads intended to accommodate growth, including Grandview Road, Brymer Road and SH23, with key infrastructure delivered through a staged framework that includes the provision of the SH23 access intersection. The ITA concludes that residual transport effects are generally less than minor to minor following implementation of the recommended mitigation measures. Accordingly, while traffic generated by the development will necessarily extend beyond the Site, its effects on the surrounding transport network can be appropriately managed, consistent with the intent of Policy 13.2.2. In relation to noise, the proposed development is considered consistent with Policy 13.2.2. The Assessment of Noise Effects (refer to Appendix 27) concludes that the proposed framework of noise limits will ensure operational noise generated within the Site is compatible with the anticipated acoustic environment of surrounding properties. Residential noise will be controlled to levels consistent with those applying in the General Rural Zone and adjoining Hamilton City Residential Zone, while the mixed-use commercial areas are sufficiently separated from existing off-site receivers such that commercial noise is not expected to be audible beyond the Site boundaries. Any pump station infrastructure will also be subject to specific noise limits to ensure mechanical plant is not dominant or intrusive at adjacent dwellings. During construction, noise cannot practicably be entirely contained within the Site; however, the Assessment of Noise Effects concludes that construction noise will be typical for a development of this scale and can comply with the applicable permitted standards through implementation of the CNVMP. The CNVMP requires the best practicable option to minimise construction noise, including restricted working hours, separation distances, quieter plant and methodologies, acoustic barriers,

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	monitoring and corrective action, with additional controls for works close to occupied neighbouring dwellings. Accordingly, while temporary construction noise may extend beyond the Site boundary, adverse noise effects will be appropriately minimised and managed at surrounding sites, consistent with the intent of Policy 13.2.2.
Policy 13.2.4 Adverse effects that cannot be contained on the site where they are generated must be remedied or mitigated.	The proposed Brymer development is considered consistent with Policy 13.2.4, as adverse effects that may extend beyond the Site have been identified through the specialist assessments and are addressed through the design of the development, mitigation measures and proposed conditions of consent. The overall consenting framework specifically provides for the avoidance, remediation or mitigation of environmental effects associated with earthworks, transport, stormwater, ecology, landscaping and the construction and operation of the development. In terms of landscape, visual and amenity effects, the development responds to its interfaces with adjoining residential and rural properties through the distribution of density, landscape treatment and the transition in development intensity toward the Site boundaries. The urban design assessment identifies measures including internalising smaller lots, integrating landscape and architectural responses, and establishing a logical street network as means of mitigating visual and amenity effects. The wider open-space and ecological framework, including wetlands, watercourses, landscaped areas and retained vegetation, also contributes to managing effects on the surrounding environment. The Acoustic Assessment (refer to Appendix XX) specifically addresses effects received beyond the Site. Construction noise and vibration will be managed through a certified CNVMP, including practicable mitigation measures, construction-hour restrictions, neighbour communication and compliance with specified noise and vibration limits at buildings on adjoining sites. The assessment concludes that the

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	development can achieve a good level of compatibility with the acoustic amenity anticipated in both the Waikato District rural environment and the adjoining Hamilton residential environment. Accordingly, while some effects will extend beyond the Site, the masterplan, specialist mitigation measures and proposed consent conditions provide an integrated framework to appropriately remedy or mitigate those effects, and the proposal is considered consistent with Policy 13.2.4.
Policy 13.2.5 Amenity values, health and safety should be protected from adverse traffic effects including: (a) noise, vibration, dust, lighting and glare (b) vehicle emissions (c) accelerated or contaminated stormwater runoff (d) visual effects of parking and loading areas (e) traffic safety and congestion.	In relation to noise and vibration, the proposed Brymer development is considered consistent with and gives effect to Policy 13.2.5, insofar as it relates to protecting amenity values, health and safety from adverse noise effects associated with traffic. The Assessment of Noise Effects (refer to Appendix 27) notes that the proposed internal road network will connect with Harrogate Place, Brymer Road and SH23. While the applicable District Plan noise limits do not require specific controls for road traffic noise from roads vested or dedicated as road, the overall Assessment of Noise Effects concludes that the Project can achieve a good level of compatibility with the acoustic amenity anticipated within the General Rural Zone and the adjoining Hamilton City Residential Zone. The development also appropriately addresses the effects of existing traffic noise from SH23 on future residents. Dwellings located within the State Highway Corridor Noise Control Boundary will be required to meet the indoor acoustic standards of NOISE-R44, with the assessment confirming that compliance can be readily achieved through standard construction upgrades. During construction, noise associated with construction activities and heavy vehicle movements will be managed through restricted construction hours, specified noise limits and the CNVMP, which requires adoption of the best practicable option to minimise noise effects at receivers and compliance with the Project's noise conditions. Collectively, these measures will appropriately protect

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	the amenity and health of existing and future residents from adverse traffic-related noise effects and are therefore consistent with Policy 13.2.5. In relation to dust, construction of the road network and associated infrastructure will involve earthworks, haulage and pavement construction over the staged construction programme. The Assessment of Noise Effects records that water carts will be used for dust suppression and moisture conditioning during the civil works. Together with the wider construction and erosion and sediment controls proposed for the Project, this will enable dust generated by construction traffic and road works to be appropriately managed so that adverse effects on neighbouring properties and road users are minimised. In relation to lighting and glare, the development will introduce street lighting and lighting associated with vehicle access, parking and servicing areas as part of the transition of the Site to an urban environment. The UDA (refer to Appendix 10) confirms that lighting forms part of the Residential Design Guidelines (refer to Appendix 9) and that the design response also addresses the arrangement of vehicle access, parking and servicing areas and their relationship with streets and public spaces. The Design Guidelines require lighting to pedestrian paths, shared accessways and vehicle access areas to support safety and visibility while avoiding unnecessary light spill into habitable rooms and neighbouring outdoor spaces. Rear lanes are similarly required to incorporate consistent and well-positioned lighting to minimise dark spots and improve pedestrian and vehicle safety, while avoiding unnecessary light spill. More generally, exterior lighting is to minimise glare and light spill through measures such as low-level, low-intensity and shielded light sources and downward-directed fittings, with exposed floodlights, bright bulbs and poorly directed lighting discouraged. Lighting can therefore be appropriately designed and located to provide for the safe operation of the transport network while managing unnecessary light spill and glare at adjoining properties. While the LVA recognises

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	that street lighting will contribute to increased luminance as part of the overall urbanisation of the Site, this occurs within a comprehensively designed urban development incorporating landscaping and a substantial blue-green and open-space network. In relation to stormwater runoff, the SMP (refer to Appendix 14) specifically provides for the treatment and attenuation of runoff generated from new impervious surfaces, including the road network. Stormwater is managed through an integrated treatment train incorporating on-site retention, the primary stormwater network, forebays for sediment capture and constructed wetlands providing water-quality treatment, extended detention, attenuation and flood storage before controlled discharge. The SMP requires treatment of runoff before discharge and limits post-development flows to a maximum of 80% of pre-development levels for the relevant design events. This approach appropriately manages both the quantity and quality effects of accelerated or contaminated runoff generated from roads, parking areas and other impervious surfaces. In relation to parking, traffic safety and congestion, the proposed transport network has been comprehensively planned as part of the masterplan to safely accommodate the additional movements generated by the development and integrate with the surrounding transport network. The Infrastructure Report (Appendix 13) provides for a hierarchy of collector and local roads, together with dedicated cycleways, footpaths and provision for future public transport services. The ITA (refer to Appendix 16) confirms that the development can be accommodated within the existing and planned transport network without unacceptable adverse effects on network safety or efficiency, subject to the proposed staging, monitoring and mitigation measures. Parking and servicing are also integrated into the development design, including landscaped parking and servicing areas associated with the apartment developments and basement parking

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	within the mixed-use buildings, reducing the visual prominence of parking within the neighbourhood centre. The proposed staged transport infrastructure framework, including the delivery of the SH23 access and associated network improvements, further ensures that traffic effects are appropriately managed as development proceeds. Accordingly, the proposal appropriately manages effects on traffic safety, congestion and visual amenity and is consistent with the intent of Policy 13.2.5. Overall, the proposed transport network and associated mitigation measures appropriately manage traffic-related noise, vibration, dust, lighting and glare, stormwater, parking and traffic safety effects, such that the amenity values, health and safety of existing and future residents will be appropriately protected, consistent with Policy 13.2.5.
Objective 13.2.6 Amenity values of localities are maintained and enhanced.	The proposed Brymer development is considered consistent with Objective 13.2.6. While the amenity and character of the Site itself will change from a predominantly rural environment to an urban residential neighbourhood, the proposal has been designed to maintain the amenity values of surrounding localities and to establish a high-quality internal amenity for future residents. The UDA (refer to Appendix 10) confirms that the masterplan has been developed to respond to the Site's context and existing neighbourhoods. It integrates wetlands, watercourses and stormwater areas into a connected blue-green network that also contributes to recreation and neighbourhood amenity, locates higher-density housing in appropriate relationships with parks, open spaces and key movement routes, and manages interfaces with adjoining residential and rural properties through building scale, lot configuration and landscape treatment. The LVA (refer to Appendix 12) similarly identifies a substantial landscape and open-space framework comprising retained wetlands, stormwater and ecological areas,

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	two public parks, two recreation reserves and 14 stormwater reserves. Lower-intensity development and greater opportunities for planting are also used along the rural edge to provide a softer transition and maintain a sense of openness toward adjoining rural land. Amenity effects from noise have also been specifically assessed, with the proposed acoustic controls and building treatment designed to provide reasonable residential amenity within the development and manage effects on adjoining residential areas. Overall, the proposal will maintain the amenity values of adjoining residential and rural localities while creating a new neighbourhood with enhanced open space, landscape, ecological and recreational amenity. It is therefore considered consistent with Objective 13.2.6.
Policy 13.2.7 Scale, intensity, timing and duration of effects of activities should be managed to be compatible with the amenity and character of the locality.	The proposed Brymer development is considered consistent with Policy 13.2.7. While the proposal will result in a substantial and permanent change in the character of the Site, the scale and intensity of development have been deliberately distributed through the masterplan to respond to the surrounding locality and manage amenity effects. The LVA and UDA (refer to Appendices 10 and 12) confirm that the development provides a graduated pattern of residential intensity. Higher-density housing is concentrated around the neighbourhood centre, key movement routes and public open spaces, while detached, duplex and larger residential lots provide lower-intensity development toward sensitive rural and residential interfaces. This approach assists in moderating the prominence of built form and provides a coherent transition between the more urban parts of Brymer and adjoining rural land. The proposed Core Controls and Design Guide further manage building height,

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	setbacks, site coverage, outlook, outdoor living, landscaping, fencing, garages and access so that the resulting built form remains appropriate to its context. The timing and duration of construction effects have also been specifically considered. Construction will occur progressively in stages over a longer programme rather than simultaneously across the entire Site, with construction noise required to comply with the relevant NZS 6803 standards and associated management measures. This staged approach limits the geographic extent of construction effects at any one time and enables effects on surrounding residents to be managed progressively. Overall, the scale, intensity and location of permanent development, together with the staged timing and management of temporary construction effects, provide an appropriate response to the amenity and character of the surrounding locality. The proposal is therefore considered consistent with Policy 13.2.7.
Policy 13.2.9 Activities sensitive to noise, dust, smoke, odour, spray drift, lighting, litter, electromagnetic radiation, vermin or traffic should locate in areas where local amenity values are not already compromised by those effects.	There is no electromagnetic radiation, vermin or spray drift anticipated to arise from the proposed development. In terms of noise, the proposed Brymer development is considered consistent with Policy 13.2.9. The Site adjoins established residential development in Hamilton City and is also influenced by traffic noise from SH23 along its southern boundary. The Assessment of Noise Effects (refer to Appendix 27) identifies that only a limited portion of the Site is within the State Highway Corridor Noise Control Boundary, and requires future dwellings within that area to be designed and constructed to mitigate road-traffic noise in accordance with NOISE-R44, including achievement of the specified internal noise environment. The assessment confirms that compliance can be readily achieved through standard construction upgrades. More generally, the noise assessment concludes that the Project can achieve a good level of

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	compatibility with the acoustic amenity anticipated in the General Rural Zone and adjoining Hamilton City Residential Zone. Operational noise will be managed through recommended noise limits and acoustic treatment requirements, while temporary construction noise and vibration will be managed through the CNVMP and associated consent conditions. Accordingly, the proposed noise-sensitive residential activities are not being located in circumstances where existing noise effects would result in an inappropriate level of amenity, and appropriate mitigation is provided where the Site is affected by SH23 traffic noise. In relation to lighting, the Site is currently predominantly rural in character, although it adjoins the established Hamilton urban area and SH23 and therefore experiences some existing urban and transport-related lighting. The proposal does not locate residential activities within an environment identified as already being materially compromised by lighting effects. While urbanisation will itself introduce additional street and residential lighting, the UDA (refer to Appendix 10) confirms that lighting is addressed through the Residential Design Guidelines as part of achieving an appropriate relationship between development, streets and the public realm. Accordingly, existing and proposed lighting is not expected to prevent an appropriate level of residential amenity being achieved. In relation to litter, there are no existing activities identified within or adjoining the Site that generate litter at a level that would compromise its suitability for residential development. The proposal is predominantly residential, with neighbourhood-scale commercial activities concentrated within the mixed-use centre. The UDA provides for servicing to be integrated into the design of the development and specifically identifies practical refuse and service arrangements within JOALs alongside landscaping, lighting and access controls. On that basis, litter and refuse effects can

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	be appropriately managed as part of the normal operation and servicing of the development. In relation to traffic and parking, the Site is influenced by the adjoining transport network, particularly SH23 and Brymer Road; however, the proposal has been comprehensively designed to integrate residential activities with a new internal movement network rather than locating dwellings in an environment where existing traffic effects materially compromise residential amenity. Parking, garages and vehicle access are specifically addressed through the UDA, including measures to reduce their visual dominance within streets and provide attractive, safe and well-overlooked public spaces. Higher-intensity residential and mixed-use development is concentrated within the planned neighbourhood centre, where parking and servicing are integrated into the site-specific building designs, including basement parking within the mixed-use development. The overall transport and urban design response therefore provides an appropriate environment for the proposed residential activities while managing potential traffic and parking-related amenity effects. Overall, the Site is not subject to existing noise, lighting, litter, traffic or other effects at a level that would make it inappropriate for the proposed residential activities. Where existing effects are present, particularly those associated with SH23 and the adjoining urban environment, the proposal incorporates appropriate design and mitigation measures to ensure a suitable level of residential amenity, consistent with Policy 13.2.9.
Objective 13.4.1 Amenity values of sites and localities maintained or enhanced by subdivision, building and development.	The proposed Brymer development is considered consistent with Objective 13.4.1. While subdivision and development will change the existing rural character and amenity of the Site, the proposal has been comprehensively designed to establish a

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	high-quality residential environment while appropriately maintaining the amenity values of surrounding residential and rural localities. The UDA (refer to Appendix 10) confirms that the masterplan and proposed development controls seek to achieve appropriate on-site amenity, privacy, outlook and access to daylight across the range of housing typologies. Buildings are orientated to support attractive, safe and well-overlooked streets and public spaces, while landscaping, setbacks, outdoor living areas and controls on garages and vehicle access assist in achieving a high-quality streetscape and residential environment. The development also incorporates a substantial blue-green and open space network, including retained wetlands and watercourses, stormwater and ecological areas, two public parks, two recreation reserves and 14 stormwater reserves. The distribution of housing density and lower-intensity development toward sensitive interfaces further assists in managing the transition to adjoining residential and rural environments. Operational and construction noise will also be managed through the recommended conditions and CNVMP, with the Acoustic Assessment confirming compatibility with the anticipated acoustic amenity of both the Waikato rural environment and adjoining Hamilton residential area. Accordingly, the proposal will establish a high level of amenity within the new neighbourhood while appropriately managing effects on the amenity of surrounding localities, and is therefore considered consistent with Objective 13.4.1.
Policy 13.4.2 Subdivision, building and development should be located and designed to: (a) be sympathetic to and reflect the natural and physical qualities and characteristics of the area	The proposed Brymer development is considered generally consistent with Policy 13.4.2, having regard to the comprehensive masterplan, UDA, LVA (refer to Appendices 12) and supporting specialist assessments.

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(b) ensure buildings have bulk and location that is consistent with buildings in the neighbourhood and the locality (c) avoid buildings and structures dominating adjoining land or public places, the coast, or water bodies (d) retain private open space and access to public open space (e) encourage retention and provision of trees, vegetation and landscaping (f) arrange allotments and buildings in ways that allow for view sharing, where appropriate (g) provide adequate vehicle manoeuvring space on site (h) provide vehicle, cycling and pedestrian connection to transport networks, including roads, cycleways and walkways, and facilitate public transport (i) promote security and safety of public land and buildings, and places (j) mitigate foreseeable effects (including reverse sensitivity effects) on, and from, nearby land use, particularly existing lawfully established activities (k) mitigate foreseeable effects on water bodies (l) maintain adequate daylight and direct sunlight to buildings, outdoor living areas and public places (m) maintain privacy (n) avoid glare and light spill.	In relation to (a)–(c), while the proposal will change the Site from rural land to an urban neighbourhood, the masterplan responds to the Site’s natural and physical characteristics by using landform, wetlands, watercourses and drainage corridors to structure development and the blue-green network. Built form is graduated across the Site, with detached and duplex housing providing a scale familiar within adjoining Hamilton residential areas and lower-intensity rural-residential lots assisting with the transition to rural boundaries. The Core Controls and Design Guide manage building height, bulk, setbacks, site coverage and boundary relationships, while landscape treatment, building articulation and specific retaining-wall measures assist in avoiding visually dominant built or engineered edges adjoining properties, public spaces and water corridors. In relation to (d)–(f), appropriate private amenity and outdoor living space is provided through the residential development controls, while the Site contains an extensive public open-space network comprising two public parks, two recreation reserves and 14 stormwater reserves, together with pedestrian connections, wetlands and watercourses. The proposal encourages substantial new vegetation through street trees, reserve planting, riparian restoration, buffer and boundary planting, alongside retained vegetation where practicable. The layout also maintains visual relief and sightlines through streets, open spaces and blue-green corridors. In particular, the LVA identifies long sightlines toward vegetation and water from Te Kootii Park and open-space corridors that provide visual separation between areas of built development. Accordingly, view sharing is appropriately provided for where relevant, recognising that this is not a landscape characterised by identified protected or significant views. In relation to (g)–(i), vehicle access, parking and manoeuvring have been incorporated into the subdivision and built-form design, with the UDA specifically addressing the integration of vehicle access, parking and servicing. The movement

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	network provides footpaths along collector and local roads, dedicated 3.5 m bi-directional cycleways along collector roads, recreational walking and cycling connections through reserves and Te Kootii Park, and provision for public transport routes connecting through Whatawhata Road and Grandview Road. Safety and security are supported through legible street layouts, building orientation, active frontages and passive surveillance of streets and public spaces, with the UDA specifically seeking attractive, safe and well-overlooked public environments. In relation to (j) and (k), foreseeable effects arising from adjoining land uses have been specifically considered. The development layout and lower-intensity edge treatments assist in managing interfaces with existing rural activities, while the Acoustic Assessment addresses compatibility with surrounding rural and residential activities and SH23, including acoustic treatment for dwellings within the State Highway Noise Control Boundary. Reverse sensitivity effects can therefore be appropriately managed through design and proposed conditions. Effects on water bodies are similarly addressed through the integrated stormwater and ecological framework. The stormwater system retains existing flow paths and discharge locations where practicable, limits post-development peak discharges, provides water-quality treatment and attenuation, and incorporates artificial wetlands, modified channels and riparian planting. Finally, in relation to (l)–(n), the proposed Core Controls and Residential Design Guidelines (refer to Appendix 9) provide a comprehensive framework for managing residential amenity, specifically addressing building height, site coverage, setbacks, height in relation to boundary, outlook, outdoor living space, landscaped areas, fencing, access, garages and parking. The UDA (refer to Appendix 10) identifies the intended outcome as a high-quality residential environment providing appropriate privacy, outlook and access to daylight across the range of housing typologies, including the higher-density forms. The Design Guidelines reinforce these outcomes

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	through requirements for the location and orientation of private outdoor living spaces, privacy measures where these adjoin streets, shared accessways or lanes, and the use of screening, landscaping, setbacks and level changes where appropriate. Balconies are also to provide an appropriate balance between privacy, outlook, daylight and passive surveillance. Lighting is similarly integrated into the amenity response, with low-level, low-intensity and shielded lighting encouraged, downward-directed fittings used to minimise glare and spill, and poorly directed lighting into neighbouring windows and outdoor living areas avoided. This is complemented by the LVA recommendation that external lighting associated with prominent retaining structures be minimised, shielded and directed downward to avoid unnecessary light effects. Collectively, these controls provide an integrated framework for maintaining privacy, daylight, outlook and residential amenity while managing potential dominance, overlooking and lighting effects between adjoining properties. Overall, although Brymer will result in a change to the existing Site, its comprehensive layout, graduated built form, open-space and landscape framework, transport connections, design controls and specialist mitigation measures collectively address each of the matters identified in Policy 13.4.2. The proposal is therefore considered generally consistent with the Policy.
Objective 13.6.1 Rural character is preserved.	The proposed Brymer development is not directly consistent with Objective 13.6.1 insofar as the rural character of the Site itself will not be preserved. The proposal will result in a permanent transition from an open pastoral landscape to a comprehensively planned urban residential neighbourhood, including new buildings, roads, infrastructure and associated earthworks. This will reduce existing landscape values associated with rural openness and rural-edge character.

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	However, the significance of this inconsistency is moderated by the Site's location and existing context. The LVA (refer to Appendix 12) identifies Brymer as a modified rural-edge landscape immediately adjoining Hamilton's established urban area, already influenced by residential development, roads, reserves and other urban-edge activities. It therefore considers the relevant landscape issue to be whether urbanisation can form a coherent and well-integrated extension of Hamilton while appropriately managing effects on the remaining rural environment. The masterplan responds to this interface through a graduated pattern of development intensity. Higher-density development is generally internalised, while lower-intensity housing is provided toward rural boundaries. In particular, the eight large residential lots provide greater building separation, openness and opportunities for substantial garden and boundary planting, and have been specifically positioned to assist the transition between the urban neighbourhood and adjoining rural land. The wider blue-green network, riparian planting, reserve planting and boundary landscaping will further soften the urban edge and moderate the prominence of built form over time. Accordingly, while the existing rural character of the Site will not be preserved, the proposal concentrates urban development in a comprehensively planned area contiguous with Hamilton and incorporates specific measures to protect the character and amenity of the remaining surrounding rural environment. On that basis, the proposal is considered to appropriately respond to the broader intent of Objective 13.6.1, notwithstanding the unavoidable change in character of the Site itself.
Policy 13.6.2 Rural subdivision and development should be of a density, scale, intensity and location to retain or enhance rural character, including:	The proposed Brymer development will result in a change from the Site's existing rural character to a comprehensively planned urban neighbourhood. It will therefore not retain all of the individual rural characteristics identified in Policy

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(aa) a predominance of natural features over built features (a) a very high ratio of open space in relation to areas covered by buildings (b) open space areas in pasture, trees, crops or indigenous vegetation (c) tracts of unmodified natural features, indigenous vegetation, streams, rivers, wetlands and ponds (d) large numbers of farm animals and wildlife (e) noises, smells and sights of farming, horticultural and forestry uses (f) post and wire fences, purpose-built farm buildings, and scattered dwellings (g) (fa) low population density (h) generally narrow carriageways within wide road reserves, often unsealed with open drains, low-speed geometry and low traffic volumes (i) a general absence of urban-scale and urban-type infrastructure such as roads with kerb and channel, footpaths, mown berms, street lights, advertising signs, sealed and demarcated parking areas, decorative fences and gateways (j) a diversity of lot sizes and shapes, related to the character and pattern of the landscape. While recognising that mineral extraction activities are of a different scale and intensity, and where appropriate should be accommodated.	13.6.2, particularly the very low population density, predominance of pasture and farming activities, scattered rural buildings, narrow rural roads and general absence of urban infrastructure. However, the Site is located at Hamilton's western urban edge and is already influenced by adjoining residential development, roads and reserves. The LVA (refer to Appendix 12) identifies the Site as a modified rural-edge landscape rather than a remote or intact rural environment and considers that the relevant landscape response is to provide a coherent and well-integrated transition from the existing urban area while appropriately managing effects on rural character and adjoining rural interfaces. In relation to the specific rural character attributes in the policy, the proposal retains and strengthens a number of natural and open-space elements within the future urban environment. Existing wetlands, watercourses and drainage features are incorporated, where practicable, within a wider blue-green network comprising retained and enhanced wetlands, created wetlands and stream channels, riparian and buffer planting, two public parks, two recreation reserves and 14 stormwater reserves. These features will retain areas where vegetation, water and open space remain prominent and will provide ecological and landscape continuity through the Site. While the proposal will necessarily replace much of the existing pasture and agricultural character, the ecological and landscape restoration proposed will improve the condition and vegetative character of parts of the existing modified wetland and drainage network. The proposed built form and subdivision pattern also avoids a uniform development response. A range of lot sizes and housing typologies is proposed, with higher-intensity development focused around the neighbourhood centre, principal movement routes and open spaces, and progressively lower-intensity development towards more sensitive interfaces. Eight large residential lots form the lowest-intensity component and are specifically intended to manage the transition to

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	adjoining rural land through greater building separation, increased space for planting and a more open edge condition. This variation in lot size, shape and density responds to landform, access, open space and landscape edge conditions and provides a more graduated transition than a uniform suburban subdivision. The transport and servicing framework will clearly introduce urban-scale infrastructure, including formed roads, footpaths, cycle facilities, street lighting and three-waters infrastructure, and therefore will not retain the rural road characteristics identified in Policy 13.6.2(h) and (i). This is an inherent consequence of the proposed urban development. The road and infrastructure network has, however, been comprehensively integrated with the masterplan, open-space network and landscape response, rather than occurring as fragmented or isolated infrastructure. The landscape strategy incorporates street, reserve, riparian and boundary planting to moderate the prominence of roads, built form and associated infrastructure as vegetation establishes. The proposed Brymer development is considered consistent with Policy 13.6.2 insofar as it relates to noise. While the development will change the existing rural character of the Site, including its acoustic environment, the Assessment of Noise Effects (refer to Appendix 27) concludes that the Project can achieve a good level of compatibility with the anticipated acoustic amenity of both the General Rural Zone and adjoining Hamilton City Residential Zone. Construction noise will be temporary and managed through the CNVMP, while operational noise will be subject to appropriate noise limits; accordingly, noise effects associated with the development are not anticipated to result in unreasonable adverse effects on the amenity of the surrounding rural environment. From a landscape and visual perspective, the proposed Brymer development will result in a clear change to the existing rural character of the Site, particularly through

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	the introduction of residential development, increased building density and urban infrastructure. However, the LVA (refer to Appendix 12) identifies the Site as a modified rural edge landscape adjoining Hamilton's established urban area, with lower landscape value and susceptibility to change. While the proposal will reduce the existing sense of rural openness, the development has been structured to respond to the underlying landscape and retain and enhance key natural features, including existing wetlands and drainage patterns, alongside wetland creation, new stream channels and extensive riparian and buffer planting. The proposal also provides a substantial network of public open spaces, recreation reserves and stormwater reserves, which will maintain areas where natural and vegetated features remain prominent within the developed landscape. The proposal also responds to the rural character outcomes in Policy 13.6.2 through variation in development density and lot size, with lower-intensity development, including large lot residential lots, located along parts of the Site's outer edges to provide a transition between the more intensive residential areas and adjoining rural land. As landscape planting establishes, the retained and enhanced natural features and open-space network will increasingly soften built development, provide visual relief and assist in integrating the development with the surrounding landscape. While the proposal will not retain all of the rural characteristics identified in Policy 13.6.2, particularly those inherently associated with farming activities, low population density and an absence of urban infrastructure, the LVA concludes that proposed planting and the blue-green network will improve the coherence and visual amenity of the new urban edge, with overall visual effects reducing towards Moderate over time. Accordingly, the proposal appropriately responds to those rural character attributes that can reasonably be retained or reflected within the proposed urban development, while recognising the planned and permanent transition in character arising from the proposal.

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Policy 13.6.3 Rural land should be retained in large holdings sufficient in size to enable productive rural activities to occur, and the creation of large holdings encouraged and where appropriate boundary relocations should be encouraged that facilitate holdings of sufficient size to support these activities.	The proposed Brymer development is not directly consistent with Policy 13.6.3, as the proposal will subdivide the Site for urban development rather than retain it in large rural holdings capable of supporting productive rural activities. However, the significance of this inconsistency is substantially reduced by the Site's location, productive characteristics and the comprehensive nature of the proposal. The Soil and LUC Assessment (refer to Appendix 29) demonstrates that the Site does not comprise a large, cohesive area of high class soil. Only approximately 2.5 ha (3.2%) meets the WDP-OiP definition of high class soil, and those areas occur as small, discrete areas that are not sufficiently large or cohesive to be separately managed for productive purposes. In addition, approximately 48% of the Site is subject to soil wetness limitations that restrict long-term productive options primarily to pastoral uses. These findings are reinforced by the Rural Productivity Assessment (refer to Appendix 29), which identifies significant physical, economic and locational constraints affecting the viability of ongoing primary production. Importantly, the proposal does not involve the creation of small rural or rural-residential holdings dispersed throughout the rural environment. Instead, it comprehensively urbanises an approximately 81 ha landholding immediately adjoining Hamilton's established urban boundary, delivering an integrated urban neighbourhood of approximately 1,043 dwellings together with supporting infrastructure, open space and community facilities. This consolidated approach avoids a fragmented pattern of rural subdivision that could progressively erode the productive potential of the wider rural environment. Accordingly, while the Site will not be retained as a large rural holding, the land has materially constrained productive potential and limited value for ongoing economically viable rural production. Concentrating urban growth within this comprehensively planned urban-edge location is considered more appropriate than

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	encouraging fragmentation of larger, cohesive and genuinely productive rural holdings elsewhere. On that basis, the proposal is considered to appropriately respond to the broader resource-management intent of Policy 13.6.3, notwithstanding the direct inconsistency arising from the urbanisation of the Site.
Objective 13.6.5 The cumulative adverse effects of subdivision or development on rural character and amenity values are avoided.	The Brymer development will result in a change to the existing rural character and amenity of the Site through its conversion from a predominantly pastoral landscape to an urban residential neighbourhood. The LVA (refer to Appendix 12) recognises this change and assesses the overall landscape effects as adverse and Moderate High, reflecting the loss of rural openness, modification of landform and the introduction of residential built form, roads, retaining walls and other urban infrastructure. However, the potential for these effects to contribute to wider cumulative degradation of rural character has been reduced through the location and comprehensive design of the development. The Site directly adjoins Hamilton’s established western urban edge and is already influenced by residential development, roads, reserves and other urban-edge activities. Rather than establishing an isolated or dispersed pocket of urban development within the wider rural landscape, Brymer provides a contiguous extension of the existing urban area. The LVA identifies this as an important aspect of the landscape response and notes that comprehensive masterplanning enables the settlement edge, movement network, housing, open space and infrastructure to be planned together rather than occurring through fragmented or piecemeal development. The masterplan (refer to Appendix 6) also manages cumulative effects at the rural interface through a graduated pattern of development intensity, including lower-density and rural-residential lots along parts of the Site edge, increased building separation and boundary planting to provide a transition to adjoining rural land. The

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	substantial blue-green and open-space network, including wetlands, stream corridors, riparian and buffer planting, parks and stormwater reserves, will further provide visual relief and soften the cumulative presence of built development and infrastructure as planting matures. The LVA considers that these measures will assist the new urban edge to read as a coherent extension of Hamilton rather than an abrupt or unresolved boundary. Other amenity effects are also specifically managed. In particular, the Assessment of Noise Effects (refer to Appendix 27) concludes that operational and construction noise and vibration can be managed so that the development remains compatible with the acoustic amenity anticipated within the adjoining General Rural Zone and Hamilton residential environment. Accordingly, while the proposal will materially alter the rural character of the Site itself, its contiguous location adjoining the existing urban area, comprehensive masterplanning and measures to manage the rural-urban interface will limit the potential for wider cumulative adverse effects on the character and amenity of the surrounding rural environment. On that basis, the proposal is considered to appropriately respond to the intent of Objective 13.6.5.
Policy 13.6.6 Rural character should be maintained and the cumulative adverse effects of subdivision should be avoided.	The proposed Brymer development will result in a clear change to the existing rural character of the Site through the introduction of residential subdivision, increased building density, roads and associated urban infrastructure. The LVA (refer to Appendix 12) recognises this change, including the reduction in rural openness and modification of the existing pastoral landscape, and assesses the overall landscape effects as adverse and Moderate High. Notwithstanding this change, the proposal has been comprehensively planned to manage the cumulative effects of subdivision on the wider rural environment.

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	Importantly, the Site directly adjoins Hamilton's established western urban edge and is already influenced by adjoining residential development, roads, reserves and other urban-edge activities. Brymer therefore represents a contiguous extension of the existing urban area rather than dispersed or isolated subdivision within the wider rural landscape. The LVA identifies that the comprehensive masterplan enables the settlement edge, movement network, housing pattern, open space and infrastructure to be planned together, providing a more coherent outcome than fragmented or piecemeal development. The layout also responds to the rural interface through a graduated pattern of development intensity. Lower-density development, including rural-residential lots, is located along parts of the Site's outer edge, providing greater building separation, opportunities for substantial planting and a softer transition between the more intensive residential areas and adjoining rural land. Retained and enhanced wetlands, new stream corridors, riparian and buffer planting, public open spaces and stormwater reserves provide further separation and landscape structure, helping to soften the cumulative presence of built development and establish a coherent urban edge as vegetation matures. Accordingly, while rural character will not be maintained within the Site itself, the proposal appropriately manages the cumulative adverse effects of subdivision on the remaining surrounding rural environment through its contiguous location, comprehensive rather than incremental development pattern, graduated rural-urban interface and substantial landscape and open-space framework. In this context, the proposal is considered to appropriately respond to the intent of Policy 13.6.6
Policy 13.6.9	The proposed Brymer development is considered to appropriately respond to Policy 13.6.9. The Site forms part of an already modified rural-edge environment directly

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Subdivision, use and development should not further compromise rural character in rural areas already modified by non-rural activities.	adjoining Hamilton's established urban area and influenced by existing residential development, roads and other urban activities. While the proposal will result in a clear transition from rural to urban character within the Site, the comprehensive masterplan avoids a fragmented or sporadic pattern of non-rural development and provides a coherent extension of the existing urban edge. Lower-density development along parts of the rural interface, together with retained and enhanced wetlands, open space and extensive landscape planting, will provide an appropriate transition to adjoining rural land and assist in limiting further effects on the character of the wider rural environment.