

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

Project name	Te Kowhai East FTAA-2508-1092
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

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

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

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

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

Managers signoff



Craig Hobbs

Chief Executive

Date 26 September 2025

26 September 2025

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

Dear Ilana Miller

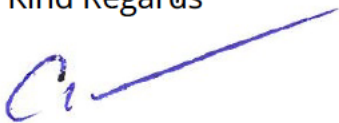
FAST-TRACK PROPOSAL: Te Kowhai East - Reference FTAA-2508-1092

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

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

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

Kind Regards



Craig Hobbs
CHIEF EXECUTIVE
WAIKATO DISTRICT COUNCIL

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

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

1. Within the Waikato District, no applications have been lodged with Council that would be a completing application.

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

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

General Comments

Strategic Land Use Pattern and Strategy Alignment

3. The Te Kowhai East development area is not identified in the Waikato District Growth and Economic Development Strategy, the Hamilton Urban Growth Strategy, or the Waikato Regional Policy Statement.
4. Waikato District Council is part of the Future Proof sub-regional partnership. The Te Kowhai East development is not identified in the Future Development Strategy 2024 (FDS). Waikato District is supportive of the proposed Te Kowhai East industrial land use to meet the medium term and long-term industrial supply deficit in the Future Proof Business Capacity Assessment 2024, and to leverage its location close to the Te Rapa industrial node, Horotiu Inland Port (operated by Ports of Auckland) and the Waikato Expressway (SH1C) interchange.
5. The development area has a zoning of rural zone (Operative Waikato District Plan) and general rural zone (Operative in Part Waikato District Plan).
6. The land meets the transitional definition of 'highly productive land' under the National Policy Statement for Highly Productive Land 2022 (NPS-HPL). The loss of highly productive land associated with the proposed development needs consideration.

Wastewater and Water Supply

7. Waikato District Council has no water supply or wastewater networks in this area or any funding currently allocated or available to fund the provision of public infrastructure in Te Kowhai East and so its urbanisation will require substantial third-party funding from Te Kowhai East. Additionally, Hamilton City Council does not have funding in its 2024-2034 Long-Term Plan to fund any enabling infrastructure for this area or any wider upgrades that might be required other than the Pukete Wastewater Treatment Plant upgrade.
8. Modelling work is needed to understand if connection to water and/or wastewater networks is feasible.
9. Independent wastewater solutions are likely to be unsustainable in the medium-long term and present maintenance and cost challenges that inevitably get shifted to the local council. We note that no technical information has been provided to the council(s) to consider as a viable alternative to municipal connections.
10. Waikato District Council and Hamilton City Council have recently agreed to establish a joint waters CCO, IAWAI - Flowing Waters. As part of the preparation of any substantive application agreements will have to be secured with IAWAI to secure water and wastewater services to the site. These connection costs would need to be borne by the applicant.

Stormwater

11. Stormwater issues connected to the site's proposed development are significant and will require considerable intervention to be resolved adequately and may result in changes to original plans and anticipated yield.

Transport

12. Waikato District Council has no plans currently to develop the transport network in this vicinity other than respond to maintenance issues. The Council's Road network in the vicinity, particularly to the north, has not been developed to respond to the traffic volumes generated from this development. Modelling will need to determine the wider implications and potential upgrades on the State Highway, Waikato District, and Hamilton City networks. Any associated costs with upgrades to support this development will need to be borne by the applicant.

13. Waikato District Council models traffic growth in the Waikato Regional Transport Model (WRTM). It is expected a development of this scale will include a Traffic Impact Study including modelling undertaken by the applicant.
14. Walking and cycling connections within the site and to other walking and cycling networks should be established for connectivity to be possible.
15. Waikato Regional Council has no public transport servicing to this area. The intensification signalled in the proposed development may suggest a demand for public transport.
16. Any proposed roads or footpaths to be vested to Waikato District Council and have connection into the Hamilton City Council network resulting from this development will require both Council's acceptance.

Affected Neighbouring Landowners

17. The change in land use from Rural to Industrial will have a significant impact and reverse sensitivity needs to be considered on neighbouring properties. Waikato District Council recommends that if this referral is Approved, that the Panel appointed by the Environmental Protection Authority adequately considers engagement with all adjoining properties and the wider area that will be affected by the development (such as noise, visual, traffic movements, lighting, and hours of operation).

Boundary change

18. The site adjoins the boundary between Hamilton City Council and Waikato District Council. The effects of the development will occur within both jurisdictions. The developer will be required to work with both councils to ensure the appropriate servicing, funding and financing is captured.
19. There is a Strategic Boundary Agreement (SBA) between Waikato District Council and Hamilton City Council, first agreed to on the 23rd of March 2005 and subsequently updated on the 5th of November 2020, the agreement covers the transfer of jurisdiction over areas from Waikato District Council to Hamilton City Council. Te Kowhai East is not an identified mapped area within the SBA, inclusion in the agreement to enable a boundary reorganisation would need to be considered by both Council's. The Council's are working collaboratively on these matters in relation to this site and others.

Summary

20. While the proposed development is not identified in the future settlement pattern, the location and land use are favorable. Waikato District Council supports working with the Applicant prior to lodgment of the substantive application in partnership with Hamilton City Council, IAWAI and NZTA.

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

Project name	Te Kowhai East
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All sections of this form with an asterisk (*) must be completed.

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

2. Please provide your comments on this application
Waikato Regional Council (WRC) appreciates the opportunity to provide comments on this application for referral to the Fast-track Approvals Act 2024 (the Act). The following responds: - firstly to the matters under section 17(3) of the Act that a local authority must provide comment on (PART A), and - secondly comments on some of matters the Minister will consider under section 22 of the Act (PART B).

PART A

SECTION 17(3)

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

WRC is not aware of any competing applications.

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

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

PART B

SECTION 22

WRC provides the following comments which are aimed at informing of certain matters relevant to the Minister's considerations under section 22 of the Act.

WRC considers that the only criteria of potential relevance to the project under section 22(2)(a) are whether the project:

- (iii) will contribute to a well-functioning urban environment
- (iv) will deliver significant economic benefits
- (x) is consistent with local or regional planning documents, including spatial strategies.

22(2)(a)(iii) & (iv) Will the project contribute to a well-functioning urban environment and will it have significant regional benefits?

WRC has undertaken a high level review of the proposal to date. The economic benefits of the project and whether it will contribute to a well-functioning urban environment have not been assessed in depth, however the following points must be addressed in any subsequent substantive application that may be lodged to enable a more detailed review to occur:

- The proposal would increase the supply of industrial land near Hamilton City. The Future Proof Business Capacity Assessment 2023 (BCA)¹ identifies a shortfall of industrial land in Hamilton City in the long-term. WRC also notes that there are significant areas of industrial development proposed as part of other projects listed in Schedule 2 of the Act and other fast-track referral applications being prepared around the periphery of Hamilton, as well as Resource Management Act processes. These collectively exceed the demand for industrial land identified in the BCA (see attachments A and B which show the current and proposed fast-track projects around Hamilton and in the Waikato Region).
- The Te Kowhai East site is located close to the Te Rapa industrial node, Horotiu Inland Port and Waikato Expressway interchange. However, there are also infrastructure capacity constraints associated with this project that would need to be addressed, including wastewater and water supply.
- The land meets the transitional definition of ‘highly productive land’ under the National Policy Statement for Highly Productive Land 2022 (NPS-HPL). The loss of highly productive land associated with the proposed development needs to be considered, including at time of substantive application.
- The application proposes to undertake lowering of the streambed gradient on the Managaheka Stream. This would have significant hydrological implications for the catchment, as well as ecological implications. These effects would need to be assessed in detail as part of any substantive application.
- The project site is located within WRC’s Waikato Central Land Drainage Scheme and there are seven land drainage drains located on or near the site. Impacts of discharges from the proposed development on the rural land drainage system need to be addressed. This includes potential upstream effects (such as flooding and pasture die off caused by standing water) and downstream flooding and ponding effects.
- The ‘Flood Extent MPD100yr Climate Change with Proposed Mitigation’ map provided in the Infrastructure Design Memo (Appendix 12 to the referral application) appears to underestimate the extent of flooding at the site. Modelling currently being developed by WRC suggests that there is likely to be shallow flooding across much of the site. More detailed modelling and analysis will be required to determine the extent of flooding within the site and to assess offsite impacts of the proposed development.

¹ Business Development Capacity Assessment 2023

22(2)(a)(x) *Is this project consistent with local or regional planning documents, including spatial strategies?*

Summary

Overall, WRC considers the project is not consistent with criteria (x) being regional or local planning documents, including spatial strategies because the project site is not identified for future development in any regional or local planning documents or spatial strategies.

WAIKATO REGIONAL POLICY STATEMENT

We note that the referral application does not include any assessment against the Waikato Regional Policy Statement (WRPS).

Te Ture Whaimana o Te Awa o Waikato

Te Ture Whaimana o Te Awa o Waikato - the Vision and Strategy for the Waikato River is incorporated into the WRPS. There is no assessment of this matter within the referral documents viewed by WRC. Any application should address how the proposal will give effect to Te Ture Whaimana.

Urban form and development

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

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

Assessment of these provisions is necessary to understand matters such as whether the development would add significantly to meeting a demonstrated need or shortfall for business floorspace, how it would contribute to well-functioning urban environments and how it would impact infrastructure capacity and contribute to infrastructure affordability.

Land and freshwater

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

Further drainage of these peat soils for development of the site will likely lead to further ground surface subsidence as the de-watered peat consolidates and breaks down (oxidises). Ongoing ground surface subsidence is likely to present ongoing challenges for construction and infrastructure

development at the site. Oxidation of the peat will also likely result in further carbon dioxide (a greenhouse gas) emissions to the atmosphere.

The subject site contains Land Use Capability Class 2 soils that meet the definition of high class soils under the WRPS. The relevant policy is LFP11 – *“Avoid a decline in the availability of high class soils for primary production due to inappropriate subdivision, use or development”*.

As highlighted above, the site also meets the transitional definition of ‘highly productive land’ under the NPS-HPL. Therefore, an assessment will be required against the relevant clauses of the NPS-HPL. If the proposed development proceeds, it will contribute further to the irreversible, cumulative loss of highly productive land in the region.

Ecosystems and indigenous biodiversity

The provisions of the Ecosystems and indigenous biodiversity (ECO) chapter of the WRPS are relevant in this project. This includes policies ECO-P1 – Maintain or enhance indigenous biodiversity and P2 - Protect significant indigenous vegetation and significant habitats of indigenous fauna.

Since the Preliminary Ecological Assessment (Appendix 16 to the referral application) was completed in 2021, there have been numerous developments and updates in national policy and other relevant matters that need to be considered (e.g. the National Policy Statement for Indigenous Biodiversity 2023, amendments to the National Policy Statement for Freshwater Management 2020, the national list of exotic pasture species and the wetland delineation hydrology tool). These changes may impact on the results and conclusions of the ecological assessment.

There are no positive benefits for freshwater ecology as part of the proposal, as significant black mudfish (an “At Risk – Declining” species) habitat will be lost. Based off previous work undertaken on and near the site, black mudfish are likely to be widespread in the drains/watercourses within the site. This would be a significant ecological constraint that will require careful assessment and management as part of any substantive application.

There are opportunities to naturalise and restore some remaining stream habitat to improve some native fish habitat quality and values, but this is limited. A significant offset mitigation plan and fish management plan will be required to manage mudfish (as well as other native fish species) values lost as a result of the proposed development.

WRC agrees that the terrestrial environment of the project area is highly modified, however highlights the following matters that will require further assessment as part of any substantive application:

- The seepage identified in the ecological assessment requires further investigation as a potential wetland. Additionally, some areas considered ephemeral watercourses in the ecological assessment were likely once wetlands that have subsequently been drained.
- The Preliminary Ecological Assessment does not provide any consideration of avifauna; effects on avifauna would need to be assessed as part of any substantive application.
- Herpetofauna (lizard) habitat is available on the project site and requires further investigation.

Insert Fast-track logo

- The large trees on the site could have features commensurate with roost habitat for long-tailed bats. This requires further consideration and bat roost protocols would need to be adopted.

Hazards and risks

As highlighted above, more detailed modelling and analysis will be required to determine the extent of flooding within the site and to assess the impacts of the proposed development offsite. Provisions within the Hazards and Risks (HAZ) chapter of the WRPS will be relevant in this regard.

FUTURE PROOF STRATEGY

The Future Proof Strategy² 2024, is a 30 year growth management and implementation plan for the Hamilton, Waipā, Waikato and Matamata-Piako sub-region and is the Future Development Strategy for the sub-region (as per the requirements of the National Policy Statement on Urban Development 2020 (NPS-UD)).

The Strategy aims to manage growth in a staged and coordinated manner. It has a compact and concentrated approach to growth, with future development focused in and around key growth areas that are identified on the settlement pattern map. The Te Kowhai East area has not been identified for growth in the Future Proof settlement pattern.

The Strategy recognises the need to be flexible when considering development proposals (as required by the NPS-UD) and includes a set of criteria, which has been embedded in the WPRS. As noted above, these criteria are particularly relevant to the proposal and should be assessed.

HAMILTON URBAN GROWTH STRATEGY AND WAIKATO 2070

The Te Kowhai East site is not identified for development in the Waikato District Growth and Economic Development Strategy (Waikato 2070) or in the Hamilton Urban Growth Strategy 2023 (HUGS).

OTHER CONSIDERATIONS

Acid sulphate soils

WRC's preliminary regional Acid Sulphate Soils Probability spatial layer³ indicates a high probability of acid sulphate soils occurrence across most of the site. When disturbed (e.g. excavated) and exposed to oxygen, acid sulphate soil materials can produce sulfuric acid which can become mobilised following rainfall.

² Our strategic direction | Future Proof

³ Waikato region acid sulfate soils preliminary risk assessment | Waikato Regional Council

This can lead to impacts on the environment, including aquatic ecosystems, and infrastructure. The potential for the occurrence of acid sulphate soils at the site should be considered in relation to the proposed development.

Water supply

The applicant is proposing to connect to Hamilton City Council (HCC) water supply infrastructure, subject to HCC approval, or alternatively take groundwater and/or rainwater. The Hydrogeological Assessment (Appendix 14) suggests the volume of water required (2200 m³/day) is feasible although groundwater quality is poor, so is not the applicant's preferred option.

The Planning Approvals List (Appendix 9) indicates that consent is needed under the Waikato Regional Plan to *"temporary divert groundwater and take surface water for dewatering and dust suppression and wheel washing"*. It is unclear where the applicant intends to source surface water for these purposes, so it is unclear whether the rule and activity status stated in the document is correct. Depending on where the water is proposed to be taken from then the surface water take may be a Non-complying activity under Rule 3.3.4.26. The groundwater diversion would be a Discretionary activity under Rule 3.6.4.13 (which has not been identified).

Public transport

The inclusion of public transport stops within the proposed development is acknowledged and supported. To ensure adequate coverage and accessibility, it is recommended that an additional off-lane public transport stop be considered near the proposed eastern neighbourhood centre.

While the proposed internal road layout allows for future public transport routing, access to the site in the short-to-medium term remains constrained. This presents challenges for service efficiency and cost-effectiveness and may require interim solutions or staged service introduction.

Should the application be referred, it is recommended that the applicant work with WRC and HCC to develop a public transport service staging plan, aligned with the Waikato Regional Public Transport Plan, which promotes access and mobility through demand-responsive service planning. This plan should identify:

- When public transport services should be introduced (e.g., post Stage Two or Three).
- What infrastructure (e.g., bus stops, turning circles) must be in place before service commencement.
- How public transport access will be coordinated with the delivery of the Rotokauri Arterial Road and other strategic connections.

This approach would ensure that public transport provision is both strategically timed and scalable, supporting mode shift while maintaining operational viability.

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

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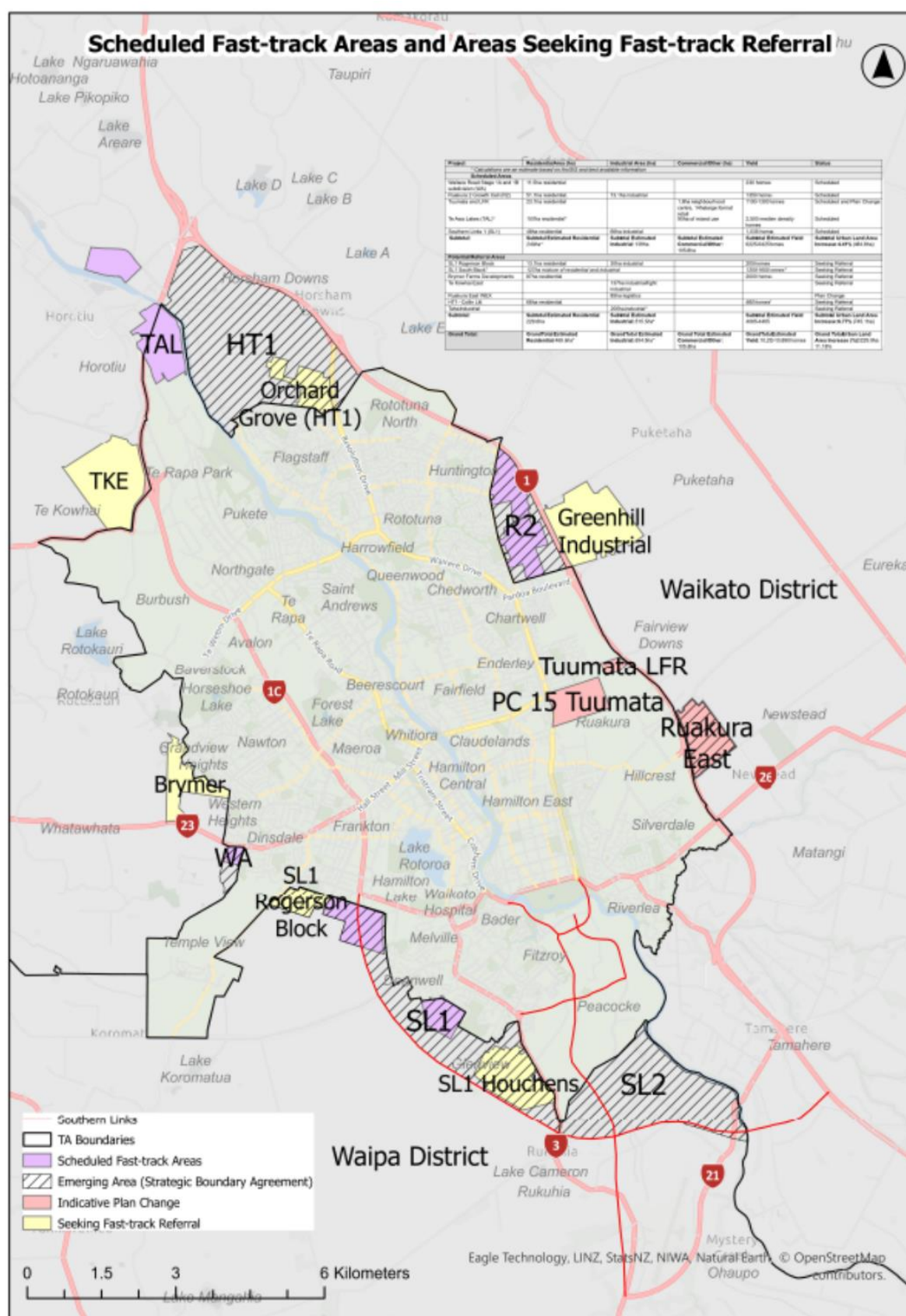
Managers signoff

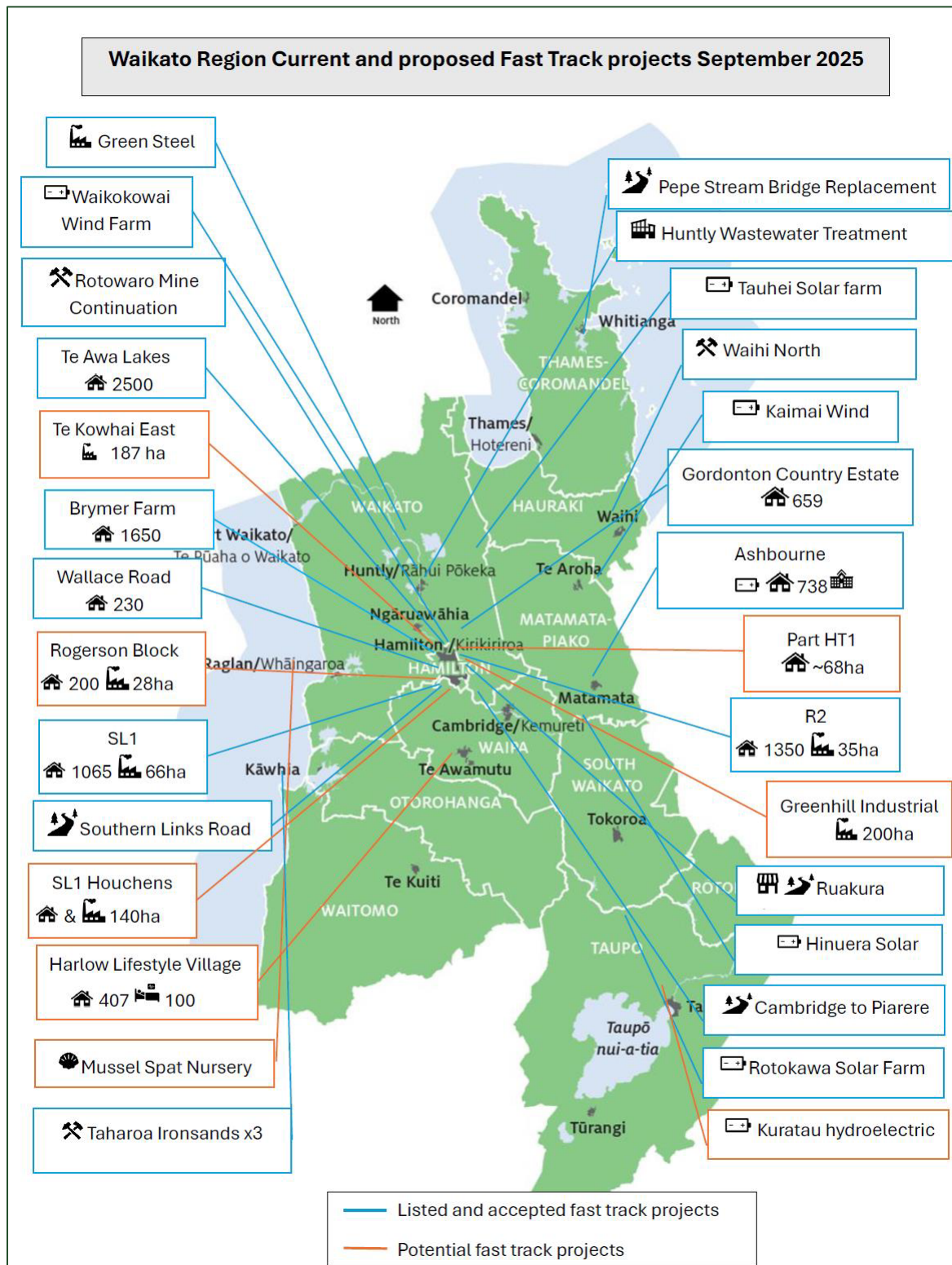
A handwritten signature in black ink, appearing to read 'AM d'Aubert', is centered within a light gray rectangular box.

AnaMaria d'Aubert

Date 26 September 2025

Manager – Regional Consents





Hon James Meager

Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport



24 SEP 2025

JMITC-10

Hon Chris Bishop
Minister for Infrastructure

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

Dear Minister,

Thank you for your invitation to comment on the referral application for Te Kowhai East [FTAA-2508-1092] under the Fast-track Approvals Act 2024. You have invited me to comment in my capacity as Associate Minister of Transport.

This application is for an industrial precinct just outside of Hamilton. The proposed spine road through the site would provide resiliency to the regional transport network by enabling an alternate arterial route between the primary transport interchanges of Horotiu and Te Kowhai (SH39) and reducing reliance on SH1.

The project is regionally significant. It will help to address significant medium and long term industrial land supply insufficiency and will contribute to a well-functioning urban environment by creating jobs in proximity to large residential growth nodes, with multi modal access.

It aligns with the strategic objectives for transport outlined in national and local long-term plans for the region. I would therefore like to take this opportunity to note my support for Te Kowhai East through the referral process.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'J Meager', written over a large, stylized blue loop.

Hon James Meager
Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport

From: Kate Whitwell
To: Infrastructure Portfolio; s 9(2)(a)
Cc: s 9(2)(a); J.(Parliament); s 9(2)(a); FTAreferals; s 9(2)(a)
Subject: FW: Invitation to comment on Fast-track referral application for the Te Kowhai East - Stage 1 project under the Fast-track Approvals Act 2024 – FTAA-2508-1092
Date: Wednesday, 24 September 2025 2:51:41 pm

Kia ora,

This email is to advise that the Minister for Climate Change has no comment to make on this application.

Ngā mihi

Kate



Kate Whitwell | Private Secretary – Climate Change
Office of Hon. Simon Watts
Minister of Climate Change
Minister for Energy
Minister of Local Government
Minister of Revenue

M: s 9(2)(a)
E: s 9(2)(a)
Parliament Buildings, Wellington 6160, New Zealand

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Friday, 29 August 2025 8:49 AM
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Shane Jones (MIN) <S.Jones@ministers.govt.nz>; Simon Watts (MIN) <S.Watts@ministers.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; James Meager (MIN) <J.Meager@ministers.govt.nz>
Cc: FTAreferals <ftareferals@mfe.govt.nz>
Subject: Invitation to comment on Fast-track referral application for the Te Kowhai East - Stage 1 project under the Fast-track Approvals Act 2024 – FTAA-2508-1092

To:
Minister for Economic Growth
Minister for Regional Development
Minister for Climate Change
Minister for the Environment
Associate Minister of Transport

Dear Ministers,

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

The Minister has received an application from Te Kowhai East Limited Partnership for referral of the Te Kowhai East – Stage 1 project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2508-1092).

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

Invitation to comment on referral application

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

If you wish to provide written comments, these must be received by **return email** within **20 working days** of receipt of

this email. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

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

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

Process

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

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

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

Important Information

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

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

Project summary

Project name	Te Kowhai East
Applicant	Te Kowhai East Limited Partnership
Location	Te Kowhai, Waikato
Project description	The project involves the development of approximately 186 hectares of rural land into a large-scale industrial and commercial precinct. The project includes associated infrastructure, land modification, and environmental management works to support the establishment of industrial and commercial activities. The project comprises: a. industrial activities across 128 hectares b. commercial activities over 2 hectares c. subdivision of approximately 174 hectares of land over three construction stages d. earthworks including cut-to-fill and cleanfill operations e. stormwater discharge into the Manganahia Stream and associated infrastructure f. surface and groundwater abstraction for potable supply and construction activities

- | | |
|--|---|
| | <ul style="list-style-type: none">g. watercourse diversions, including infilling of artificial channels and floodplain areash. construction of culverts and realignment of streami. bed disturbance associated with watercourse enhancementj. land use changes and soil disturbance on contaminated landk. an intersection upgrade on State Highway 39. |
|--|---|

Yours sincerely



Office of Hon Chris Bishop

Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport |
Associate Minister of Finance | Associate Minister for Sport & Recreation | Leader of the House | MP for Hutt South

Office: 04 817 6802 | EW 6.3

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

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09 SEP 2025

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0020242

Dear Chris

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

- **Out of Scope**
- Out of Scope
- Te Kowhai East, FTAA-2508-1092.

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

Out of Scope

Out of Scope

Out of Scope

Te Kowhai East, FTAA-2508-1092

This proposal is a 186-hectare industrial development in Waikato. The development includes 137-hectares of industrial development for light industrial activities, around 181 industrial lots of varying sizes, two commercial areas, and other related infrastructure developments. The proposal to construct an industrial development in Hamilton addresses significant potential shortages in industrial land supply in an existing and well-located industrial precinct.

The project has substantial potential economic benefits, based on the economic assessment provided by the applicant. The forecasted quantitative economic impacts during the 10-year construction and development period include a \$371.3 million value-add to GDP and the creation of 3,065 new full-time roles. Once operational, the project is estimated to contribute \$619.6 million to GDP annually and generate 4,155 full-time jobs, which would be substantial for Hamilton and the wider Waikato region. This project may also have ongoing economic benefits from the retail and commercial businesses it will attract in the future.

This development is aligned with the Government's economic growth plans as it would provide substantial investments to spur industrial, retail and commercial activity and related employment opportunities. This is important for supporting the growth of regional economies.

Yours sincerely



Hon Nicola Willis
Minister for Economic Growth

Hon Penny Simmonds

Minister for the Environment
Minister for Vocational Education
Associate Minister for Social Development and Employment



22 September 2025

PS-COR1549

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

Dear Chris,

Thank you for the invitation to provide comments on the application for referral of the Te Kowhai East project to an expert panel (the Panel) under section 17 of the Fast-track Approvals Act 2024 (FTAA).

Having reviewed the referral application, I have some comments about the level of information provided to determine the significance of potential adverse environmental effects of the project.

I note the development is proposed on land that is part of the Mangaheka Stream and Te Kowhai Stream catchments with works proposed near and in parts of the Mangaheka Stream but does not provide a site-specific ecological assessment.

The applicant will be required to provide more detailed assessments at the substantive stage. However, it would be more efficient to identify as soon as possible if there are likely to be significant adverse effects from the project. This would enable appropriate strategies to avoid, remedy or mitigate them to be considered prior to lodging the substantive application.

You may wish to use your discretion to specify information that is required to be provided with the substantive application under section 27(3)(b)(ii) of the FTAA, including:

- a. An ecological assessment of operation effects by a suitably qualified person that covers the entire project site, including the following information:
 - i. assessment of the implications of changes to the water courses on the site for the freshwater and indigenous biodiversity
- b. Additional plans and surveys required as a result of the ecological assessment.

This approach will reduce the risk of unanticipated significant matters being identified late in the process and support the smooth and efficient conduct of the Panel's deliberations.

Thank you again for the opportunity to provide comments on this referral application.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'P. Simmonds'.

Hon Penny Simmonds
Minister for the Environment

Hon Shane Jones

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



9 September 2025

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act referral application – Te Kowhai East (resubmission), FTAA-2508-1092

Dear Chris

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

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

I have considered the referral application for the Te Kowhai East (resubmission) project and its alignment with the priorities of my Regional Development portfolio. My comments are attached as Annex One.

Yours sincerely

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

Hon Shane Jones
Minister for Regional Development

Annex One – Regional Development comments

Project overview

1. Te Kowhai East Limited Partnership has applied for Fast-track approval to develop a 186-hectare industrial precinct adjacent to the Te Kowhai Interchange on the Hamilton City boundary. The site could host a range of tenants from varying sectors, including construction, manufacturing, and wholesale trade businesses.
2. Independent economic analysis included in the application (produced by Urban Economics) sets out the following additional direct, indirect and induced economic impacts for the wider Hamilton area, when compared to the site's existing rural uses:
 - a. During the construction phase (roughly 10-year period) – contribute an additional \$371.3 million to GDP and create approximately 3,065 full-time equivalent (FTE) jobs.
 - b. During the ongoing operation – contribute an additional \$619.6 million in GDP and create approximately 4,155 FTE jobs per annum.
3. The economic analysis suggests the site will service most of the Upper North Island, although it is not clear in exactly what regard.

Comments

4. The proposed economic benefit could be regionally significant and add to the North Waikato's growing central position in economic activity from across the North Island.
5. There may need to be consideration for displaced rural use activities resulting from the project, and the associated impacts, such as a reduction in productive capacity. Comment on this should be provided through relevant Ministerial portfolios (such as Agriculture).

Conservation House
PO Box 10420
Wellington 6143
fast-track@doc.govt.nz

24 September 2025

Ilana Miller
General Manager, Delivery
and Operations
Ministry for the Environment
PO Box 10362
Wellington 6143

Tēnā koe Ilana

Re: Comment under section 20 of the Fast-track Approvals Act 2024

On 29 August 2025, the Department of Conservation (DOC) received an invitation to comment from the Ministry for the Environment (MfE) in relation to the Te Kowhai East application (File ref FTAA-2508-1092) in accordance with section 20 of the Fast-track Approvals Act 2024 (FTAA).

This letter provides comments on the matter.

Request

Whether the interest “Subject to Part IVA of the Conservation Act 1987” recorded on multiple Record of Titles for the project area would affect the applicant’s ability to undertake the works, or whether this interest triggers any additional approvals or requirements that have not been identified in the application.

Response

Part IVA of the Conservation Act relates to the reservation of marginal strips when the Crown disposes of land, extending along and abutting qualifying water bodies. The applicant has not provided information regarding the presence of any qualifying water bodies on the sections in question.

If any qualifying water bodies are located on or adjacent to the sections indicated, then additional requirements and approvals may be required.

Additional requirements would be to provide for marginal strips in the subdivision design. Additional approvals could be in the form of a concession, which could be obtained outside of the FTAA process.

DOC is therefore of the opinion that the applicant should be able to undertake the works, albeit with design detail amended and/or with additional approvals required.

We trust that our comments adequately respond to the matter raised. If there are further questions in relation to this response please don't hesitate to [contact](#) us.

Nāku noa, nā



Jenni Fitzgerald
Fast Track Applications Manager

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

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

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Department of Conservation		
*First name	Terry		
*Last name	Calmeyer		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a) s 9(2)(a)		

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

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

Manager's signoff



Jenni Fitzgerald

24 September 2025

Director-General of Conservation s17 comments

Project name	Te Kowhai East
Applicant name	Te Kowhai East Limited Partnership
Application number	FTAA-2508-1092
Project summary details	Te Kowhai East is a 186 ha proposed Industrial Precinct adjacent to the Te Kowhai Interchange on the Hamilton City boundary. It is currently located within Waikato District Council. The proposal consists of 137 ha of net industrial land, plus two small commercial nodes and includes the construction of culverts in the Mangaheka stream. Wildlife Approval to salvage lizards is sought. The site does not affect any Public Conservation Land.

1 General comment

- 1.1 As the project includes an approval under a specified Act for which DOC is the administering agency, the applicant was required to undertake pre-lodgement consultation in accordance with section 11 of the FTAA.
- 1.2 In relation to this application, the applicant took steps to consult with DOC prior to lodging. Consultation was initiated on the 12th of June 2025 and DOC provided feedback to the applicant on the 16th of July 2025.
- 1.3 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, it considers it likely that with the appropriate design and conditions, effects can be managed to appropriate levels.
- 1.4 DOC is not aware of any other reason the project should not be referred.

2 Minister's decision on referral application

- 2.1 Sections 21 and 22 of the FTAA set out matters to be considered in determining whether a referral application should be accepted.
- 2.2 DOC notes that other agencies are better placed to comment on most matters, including those in section 22. Comments below are therefore targeted to sections where DOC has specific interests or information relevant to the Minister's decision.
- 2.3 For completeness, DOC has considered the criteria for assessing referral applications in section 22 and has not identified anything it considers the Minister should consider.
- 2.4 Section 21(3) and (4) set out when the Minister may/must decline a referral application. DOC has considered these criteria and comments as follows:

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	The meaning of ineligible activity is set out in s5 of the FTAA – DOC has considered s5(1)(f), (h), (i), (j) and (k) and has not identified any aspect of the project that would meet the definition.
21(3)(c)	Is there adequate information to inform a decision	No detailed ecological information has been provided. If the referral to the fast-track process is granted and the applicant proceeds with the substantive application process, then detailed ecological surveys (including lizard surveys) would need to be undertaken. These surveys would confirm which species, if any, are found on the site. A wildlife approval should then be applied for to protect wildlife present at the site that are likely to be impacted by the project. Based on our knowledge of the existing environment and species expected to occur on the site, our understanding of the Proposal, and our experience of what kind of design changes and conditions could be implemented, we are confident that once more detailed information is available, it would be possible to achieve a Proposal with conditions that has acceptable outcomes. DOC therefore considers the information adequate in terms of a referral decision.
21(4)	Are there any other reasons not specified	DOC has not identified any other reasons why the project should not be referred.
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	DOC has not identified any inconsistency with any relevant settlement or other obligation. Relevant Treaty Settlement Acts are: • Ngati Tuwharetoa Raukawa and Te Arawa River Iwi Waikato River Act 2010 • Nga Wai o Maniapoto (Waipa River) Act 2012 • Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 • Ngāti Hauā Claims Settlement Act 2014
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	DOC has not identified any reason why the conservation approval identified should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Comprehensive surveys or investigations of ecological features, including watercourses and habitat of fauna have not been provided by the applicant. As such DOC considers there is the potential for the project to have significant adverse effects given values

Section	Criteria	Comments
		known/anticipated to be present. Based on our knowledge of the existing environment and species expected to occur on the site, our understanding of the Proposal, and our experience of what kind of design changes and conditions could be implemented, we are confident that once more detailed information is available, it would be possible to achieve a Proposal with conditions that has acceptable outcomes. Overall, however, based on the high-level information available, DOC considers adverse effects of the project may be able to be addressed through the design phase and with the imposition of appropriate conditions.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the applicant's compliance history under the Wildlife Act 1953.
21(5)(g)	Would a substantive application have any competing applications	No competing applications relating to Wildlife Approvals have been identified.

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

Section	Criteria	Comments
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	DOC notes that a Wildlife Act approval of this nature would typically take three-four months to process, which is not significantly longer than the FTAA process is expected to be. However, there may be benefits for the applicant in terms of consideration being combined with RMA approvals, and given the different decision-making framework under the FTAA.
22(2)(a)(ix)	Will this project address significant environmental issues?	No.
22(2)(a)(x)	Is the project consistent with local or regional planning documents, including spatial strategies?	Relevant local or regional documents include the Waikato Conservation Management Strategy 2014 – DOC has not identified any inconsistency with this document. However, in preparing their substantive application, the applicant should give consideration to matters in section 5.1.1 of the CMS, including: • maintaining and restoring the ecological integrity of relevant ecosystems and habitat types; • conserving any threatened and at-risk species to ensure their persistence; and • protecting freshwater fish habitat, fish passage, and the maintenance of habitat connectivity and water quality of any waterway. DOC notes that relevant iwi authorities have produced planning documents that should also be considered.
22(b)	Any other matters the Minister may consider as relevant?	DOC notes that the application falls within the Waikato River catchment and therefore Te Ture Whaimana must be considered. DOC has not assessed the application for consistency with Te Ture Whaimana.

3 Other considerations

- 3.1 DOC notes that once a referral decision is made, the scope of any subsequent substantive application is confined by that of the referral application. DOC has provided input to a number of fast-track projects to-date where additional conservation approvals that would have been

available under the FTAA have not been included in an application. In some of these cases it has been necessary for applicants to seek additional approvals under the specified Acts via normal processing. This can result in inefficiencies, additional costs and undermining of the benefits of the 'one stop shop' approach the FTAA was designed to deliver.

- 3.2 Given the lack of assessment undertaken at the referral stage, DOC considers it may be beneficial for the applicant to consider whether it should seek to include additional approvals that would potentially be required on a precautionary basis. To this end, DOC suggests the Minister consider whether further information should be sought from the applicant under s20 prior to making their decision to ensure all approvals in scope of the FTAA and necessary to implement the project are included.
- 3.3 In particular, DOC recommends that the Minister request further information from the applicant, clarifying whether any activities proposed in natural rivers, streams, or water meet the criteria for requiring approval under the Freshwater Fisheries Regulations, and if so, whether the applicant is also seeking these approvals under the FTAA or intends to instead obtain approval separately outside of this process.

4 Matters for the Minister to specify (s27)

- 4.1 DOC notes that there is no obligation on an applicant to undertake pre-lodgement consultation with administering agencies in respect of a substantive application for a referred project. Given the lack of detail in the referral application DOC considers it would be highly beneficial for the applicant to engage further with DOC as it relates to any conservation approvals (as well as conservation matters subject to RMA consideration) prior to making any substantive application. Benefits include ensuring information necessary to support decision-making with respect to conservation approvals is included; supporting the management of any actual and potential adverse effects on the environment; and early identification and resolution of any issues.
- 4.2 To this end, DOC suggests the Minister considers specifying that evidence of further engagement with DOC be submitted with the substantive application, should the decision be to accept the referral application.

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

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

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

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

If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

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

Managers signoff



Dr Mark Davey
Director Urban and Spatial Planning
Hamilton City Council

Date: 23/09/2025

25th September 2025

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

Dear Ilana Miller

FAST-TRACK PROPOSAL: Te Kowhai East - Reference FTAA-2508-1092

Thank you for the invitation to Hamilton City Council to provide written comments on the referral application for the Te Kowhai East Development.

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

Should you have any queries regarding the content of this document please contact Chris Dillon, Principal Spatial Planner directly on s 9(2)(a)

Kind Regards



Dr Mark Davey
Director Urban and Spatial Planning Unit | Strategy, Growth & Planning Group
Hamilton City Council
s 9(2)(a)

Cc: Blair Bowcott
General Manager – Strategy, Growth & Planning Group
Hamilton City Council
s 9(2)(a)

Hamilton City Council Comments

Strategic Land Use Pattern and Strategy Alignment

Te Kowhai East is outside the current Future Proof Settlement Pattern. However, Hamilton City Council (HCC) has been investigating this area in good faith with Te Kowhai East LP and Future Proof partners for potential urbanisation.

Te Kowhai East LP has been actively engaging with Hamilton City Council, Waikato District Council and Waikato Regional Council for over 2 years regarding their development aspirations for this potential growth area.

HCC is supportive of the provision of industrial land at the subject site to meet the medium and long-term industrial supply deficit in the Business Capacity Assessment 2024 and to leverage it's location close to the Te Rapa industrial node, Horotiu Inland Port (operated by Ports of Auckland) and the Waikato Expressway (SH1C) interchanges.

Wastewater and Water Supply

The Councils have no funding currently allocated or available to fund the provision of public infrastructure in Te Kowhai East and so its urbanisation will require substantial third-party funding from Te Kowhai East LP and other agencies. Additionally, Hamilton City Council does not have funding in it's 2024-2034 Long-Term Plan to fund any enabling infrastructure for this area or any wider upgrades that might be required other than the Pukete Wastewater Treatment Plant upgrade.

There is no potable water allocation available to service this area. Hamilton City Council's existing potable water allocation lacks capacity to service this area. Te Kowhai East LP will need to secure a potable water allocation to enable this development.

Modelling work is needed to understand if connection to water and/or wastewater networks is feasible.

Independent wastewater solutions are likely to be unsustainable in the medium-long term and present maintenance and cost challenges that inevitably get shifted to the local council.

Waikato District Council and Hamilton City Council have recently agreed to establish a joint waters CCO, IAWAI - Flowing Waters. As part of the preparation of any substantive application agreements will have to be secured with the water entity to supply water and wastewater services to the site.

This area will require either upgrade to the Pukete Wastewater Treatment Plant (which are included in Hamilton City Council or Waikato District Council's Ngaaruawahia Wastewater Treatment Plant. Upgrades for Pukete are included in Hamilton City Council's 2024-2034 Long Term Plan. The Councils would expect the Te Kowhai East LP developers to contribute towards the cost of this infrastructure.

Stormwater

Stormwater issues connected to the site's proposed development are significant and will require considerable interaction to resolve adequately and may result in changes to original plans and anticipated yield.

Transport

Urbanisation of Te Kowhai East will likely need:

- a state highway connection
- connections to HCC's and Waikato District's road network
- stormwater interventions to ensure the functionality of the remaining Waikato Regional Council drainage network is maintained

Growth in this location will likely bring forward the need for a range of transport upgrades including ultimately the Northern River Crossing which is identified in the 2024-2034 Infrastructure Strategy due to the east-west commuter flows.

Walking and cycling connections within and between the site and nearby urban areas should be incorporated into the development.

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

Value Capture

Hamilton City Council seeks value capture mechanisms for urban development of this scale to pay for infrastructure new or upgraded within and externally of the development area. This is particularly important given that development contributions cannot be required in relation to developments outside of the current territorial boundary. This value capture will need to be delivered via consent conditions and commercial agreements.

Boundary change

A local government boundary adjustment may be required to enable integrated servicing and funding and financing (i.e. the collection of development contributions and rates). If the Joint Ministers are to agree to this application, the Councils will need to consider a boundary transfer process.

The Strategic Boundary Agreement (SBA) between Hamilton City Council and Waikato District Council, first agreed to on the 23rd March 2005 and subsequently updated on the 5th November 2020, does not include the Te Kowhai East land area, however the SBA allows for other areas as may be nominated and mutually agreed between the two Councils to be transferred into Hamilton City Council's jurisdictional control. The SBA establishes a framework for the transfer of land to occur in order to enable urban development to proceed.

Summary

The proposal is outside the FutureProof settlement pattern but has several locational attributes that commend it for industrial development, including its location to the north of Hamilton and adjoining the Waikato Expressway.

Development of the site will require connection to reticulated networks, and upgrades of existing surrounding roading infrastructure.

Development of the site may rapidly bring forth consideration of a boundary change. However, that is contingent upon the orientation of water, wastewater and transport networks.

Fast Track Referral Application: Te Kowhai East Development NZTA Comments

NZTA thanks the minister for the opportunity to comment on an application to refer this proposal to the fast track approvals process.

NZTA has, for some years, worked with local bodies on efforts to address growth pressures in the wider context of the area to the north west of Hamilton. Assessments of developments have taken place in several contexts including the Hamilton City Urban Growth Strategy, the Future Proof Strategy, the Waikato District Plan review and the Hamilton City Emerging Areas process.

The Te Kowhai East development has been included in these discussions since 2021 resulting in an acceptance that Te Kowhai East was, generally, in line with the strategies for development in the wider area subject to further investigation of several matters including types of land use, and transport.

A large-scale development such as Te Kowhai East could have significant implications for both the wider transport network and the roading network in the vicinity of the proposal. The development as proposed would have only two links to the existing road network – the main link would be to State Highway 39 and a secondary link to the local road network at Onion Road. The referral application contains an initial assessment (Initial Transport Assessment Memo) of the transport effects of the proposal and suggests mitigation measures to integrate the traffic generated by the proposal with the transport network.

NZTA's subject matter experts have reviewed the Initial Transport Assessment Memo and consider that its analysis of traffic generation and the mitigation measures seem to be sound, subject to several matters where additional assessment is needed. The applicant's assessment reaches similar conclusions and commits to the preparation of a formal integrated transport assessment as part of the substantive application. The assessment will include modelling to accurately identify traffic effects and infrastructure changes needed to accommodate the additional traffic.

To have full confidence in the effects identified and mitigation proposed, NZTA needs to review the substantive application prior to lodgement, and the application should examine those matters which NZTA has identified as needing more work, in particular:

- The initial transport assessment assumes that warehousing will make up 85% of land use on the site. Warehousing is a relatively low traffic generator compared with other likely land uses such as industrial, so this assumption needs supporting analysis and testing.
- Trip generation needs sensitivity testing and directional split testing
- Concept designs of mitigation measures are needed.
- The extent of four laning of State Highway 39 / Koura drive should be confirmed and any implications for the State Highway 1C / Koura Drive interchange identified.
- The concept design for the State Highway 39 roundabout should be based on two lanes.
- Confirmation that proposed stormwater management measures will not have adverse effects on the state highway network.

In addition, NZTA would expect significant involvement in design of mitigation measures with reviews at 50%, 85%, and 100% of completion, and provision for safe system audits.

In conclusion, based on the information provided and, subject to the additional work outlined above, NZTA has no concerns with the Te Kowhai East development being referred to the fast track approvals process.

NZTA would welcome the opportunity to comment on any substantive application.

Fast Track Referral Application: Te Kowhai East Development NZTA Comments

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NZTA has, for some years, worked with local bodies on efforts to address growth pressures in the wider context of the area to the north west of Hamilton. Assessments of developments have taken place in several contexts including the Hamilton City Urban Growth Strategy, the Future Proof Strategy, the Waikato District Plan review and the Hamilton City Emerging Areas process.

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In addition, NZTA would expect significant involvement in design of mitigation measures with reviews at 50%, 85%, and 100% of completion, and provision for safe system audits.

In conclusion, based on the information provided and, subject to the additional work outlined above, NZTA has no concerns with the Te Kowhai East development being referred to the fast track approvals process.

NZTA would welcome the opportunity to comment on any substantive application.



Alan Catchpole – Principal Planner

PP Nicola Foran 25/09/2025