

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

Project name	Greenhill Industrial Park - FTAA-2602-1171
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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 – Te Kaunihera aa Takiwaa o Waikato		
*First name	Donna		
*Last name	Tracey		
Postal address	s 9(2)(a)		
*Contact phone number	s 9(2)(a)	Alternative	0800 492 452
*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 21 July 2026

21 April 2026

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: Greenhill Industrial Park - Reference FTAA-2602-1171

Thank you for inviting Waikato District Council (Council) to provide written comments on the Referral Application for Greenhill Industrial Park (the subject site).

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

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

Kind Regards



Craig Hobbs
CHIEF EXECUTIVE
WAIKATO DISTRICT COUNCIL

Mandatory Comments

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

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

1. Council has received one land use resource consent application for an expressway service centre comprising a service station, three quick service restaurants, food and beverage outlets, and other ancillary activities at 133 Pukeroa Road (Legal Description: Section 88 SO 572875, RT 1177690).

This application is currently on hold under section 92 of the Resource Management Act 1991.

The land use consent application site is located on a portion of one of the titles identified in the Fast-track proposal. However:

- the consent application relates solely to land subject to the Greenhill Expressway Service Centre Commercial Overlay, which was confirmed as part of a settled appeal to the Waikato District Plan (Operative in Part); and
- the land subject to the overlay and the land use consent is not included in the proposed Fast-track application.

Given the different land uses and non-overlapping application areas, Council does not consider this to be a competing application for the purposes of section 47 of the Fast-track Approvals Act 2024.

2. The Ruakura 2 (R2) Growth Cell development area is a listed Fast-track application under the Act, which proposes to supply 35 hectares of industrial land and 132 hectares (approximately 1350 dwellings) of residential land. While this is not an application that will be lodged with council, given that R2 and the subject site are separated by the Waikato Expressway (WEX), Council considers R2 to be a competing application (**Figure 1**), particularly considering industrial land supply and consequential infrastructure demands.



Figure 1: Locality map of R2 (brown polygon) and the subject site (red polygon).

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 provide written Confirmation.

3. Council confirms that there are no existing resource consents issued where section 165ZI could apply if the project were to be applied for as a resource consent under the RMA.
4. There is an existing resource consent attached to one of the subject properties. This is a land use resource consent to establish and operate a landscaping supply yard at 112 Puketaha Road (Lot 1 DP 515771).
5. Council is of the opinion that the consented activity (being industrial in nature) is compatible with the proposed Application.

General Comments

Council records the following in relation to the Referral Application for the subject site, including a response to the invitation to comment on the applicant's assertion that the development will have significant regional benefits including *"increasing industrial land supply that will contribute to addressing forecast shortfall and tenure constraints in the Hamilton City market."*

Strategic Land Use Pattern and Strategy Alignment

6. The subject site is zoned Rural Zone. The proposal is not strategically aligned with the Future Proof Strategy (FPS), Waikato Regional Policy Statement (WRSP) or the Waikato District Growth and Economic Development Strategy 2070 (Waikato 2070).
7. The development has not been subject to any spatial planning processes and is located outside the urban limits set out in the WRPS.
8. Although industrial land demand pressures in Hamilton City are recognised, they are expected to materialise over the long term. The city's projected future shortfall highlights limited capacity within its boundaries; however, three additional Fast-track projects situated on the city's periphery may help address the anticipated shortfall in industrial land supply.
9. Rural residential lots and buffers are proposed to manage industrial interfaces, but there is currently limited certainty around their effectiveness, permanence and ability to avoid long-term reverse sensitivity effects. This is relevant to the considerations in section 22(1)(b)(i) of the Act, including whether the fast-track approvals process provides an appropriate framework to manage long-term land-use compatibility outcomes.
10. The subject site comprises of Land Use Classification (LUC) 2 and 3 soils, which will require an assessment against the National Policy Statement for Highly Productive Land (NPS-HPL).
11. The Waikato Expressway (WEX) serves as an urban growth boundary for Hamilton City Council, especially for the R2 Growth Cell. The proposed development extends beyond this limit, which could lead to unplanned growth and urban sprawl, weakening the WEX's strategic role.
12. The proposal generates notable cross-boundary implications for both Council and HCC, encompassing effects on the WEX interchange, transportation and servicing infrastructure, land use compatibility, and the long-term urban form. These factors have not been accounted for in existing growth and infrastructure planning.

Natural Hazards

13. Key commentary on natural hazards in Council's database for the subject site has been summarised (**Table 1**).

Table 1: Summary of natural hazard assessments.

Property	Assessment
257 Greenhill Road, Hamilton – Property Number 2017808	No recorded hazards on Natural Hazard Register.
133 Pukeroa Road, Hamilton – Property Number 2026733	
4 Taha Lane, Hamilton – Property Number 2002438	
175 Puketaha Road, Hamilton – Property Number 2020884	
192 Puketaha Road, Rototuna – Property Number 2007873	
154 Puketaha Road, Rototuna – Property Number 2019221	
112 Puketaha Road, Rototuna – Property Number 2020247	Recorded Natural Hazard – Subsidence - Possible subsidence - Utilities assessment carried out by Environmental Planning Engineer, as part of a subdivision resource consent (SUB0026/08) verifies Peat soils and unconsolidated sediments.
112A Puketaha Road ROTOTUNA – Property Number 202048	

14. Council concurs with the key findings and recommendations made in Attachment 8 to the Application.
15. The investigations available on the New Zealand Geotechnical Database (NZGD) along the western boundary of the site (WEX) show soils in low lying areas around the site consistent with the mapped Hinuera Formation.
16. Based on the expected geology, natural hazards on the site are likely to include:
 - a. liquefaction - preliminary assessment indicates a high hazard is likely on the plains areas.
 - b. static settlement - is likely to be a hazard in the low-lying areas.
 - c. slope instability - High-level assessment indicates a low risk of instability, with steeper slopes likely to be modified by earthworks.

d. low bearing.

17. Council recommends an acid-sulphate soil survey (ASS) to investigate if actual or potential acid-sulphate soil is present on the subject site and any subsequent management plans, including construction methodology.

Land Hazards

18. Attachment 9 (of application) identified potentially Hazardous Activities and Industries List (HAIL) activities across the subject site, including historic agricultural practices (e.g. livestock spray races and fertiliser application), areas of uncharacterised fill, and potential contamination associated with legacy buildings, such as asbestos-containing materials and lead-based paint.
19. As a result, parts of the site are likely to meet the definition of a 'piece of land' under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NESCS), suggesting that the proposed development will be subject to its requirements.
20. Council supports a standard contaminated land management pathway, including a Detailed Site Investigation and Site Management Plan, with further remediation and validation measures to be implemented where contamination exceeds relevant human health criteria.
21. Key commentary on land hazards in Council's database for the subject site and Attachment 9 to the Application has been summarised (**Table 2**).

Table 2: Land hazard assessment summary.

Property	Assessment
257 Greenhill Road, Hamilton – Property Number 2017808	HAIL: I (asbestos, lead-based paint), G.3 (uncharacterised fill). Risk associated with legacy structures and potential contamination from infilled material of unknown origin. Pastoral use indicates cadmium risk.
133 Pukeroa Road, Hamilton – Property Number 2026733	
175 Puketaha Road, Hamilton – Property Number 2020884	HAIL: I (asbestos, lead-based paint), A.8 (livestock spray race). Elevated risk due

112 Puketaha Road, Rototuna - 2020247	to potential pesticide residues associated with historical stock treatment. Pastoral land use also indicates potential cadmium accumulation.
192 Puketaha Road, Rototuna - Property Number 2007873	No recorded HAIL activities. Historical pastoral use indicates potential cadmium risk.
154 Puketaha Road, Rototuna - 2019221	HAIL: I (asbestos, lead-based paint). Risk primarily associated with legacy buildings. Pastoral cadmium risk present.
4 Taha Lane, Hamilton - Property Number 2002438	HAIL: I (asbestos). Regional Council LUI entry considered likely erroneous. Overall low contamination risk relative to wider site.

Transportation

22. Council generally concurs with the concluding statement from Attachment 2 to the Application that *“through strong design and technical input, Greenhill can achieve a built form, environment and community that positively benefits future residents and the wider Waikato community, without resulting in adverse environmental effects.”*
23. As anticipated, the Application does not provide the level of detail required for a comprehensive technical assessment. Should the Referral Application progress to a Substantive Application stage, it is essential that the transportation and stormwater matters previously identified in the joint Council and HCC Statement of Facts letter, dated 17 December 2025, are fully addressed and supported by appropriate technical evidence.

Three Waters Servicing

24. Council and HCC have jointly agreed to the establishment of an asset-owning waters services council-controlled organisation, IAWAI – Flowing Waters Limited (IAWAI) pursuant to the Local Government (Water Services) Act 2025.
25. From its establishment on 1 July 2026, IAWAI will be involved in future discussions relating to three waters servicing for the subject site.

26. Any potential Substantive Application will require input from IAWAI in relation to all water supply and wastewater services.

Water Supply

27. There is an existing water supply scheme in the area, but it is not to accommodate a development of this scale and intensity.

28. The connections are on Restricted Flow Supply, which will not meet firefighting requirements for the subject site.

29. The development may need to be modelled as an addition to the R2 Growth Cell to assess whether connection to the HCC water network is feasible.

Wastewater

30. There is no Council wastewater scheme in the area to service the subject site.

31. The development may need to be modelled as an addition to the R2 Growth Cell to assess whether connection to the HCC wastewater network is feasible.

Stormwater

32. Council and its partners acknowledge the importance of integrated stormwater management for the subject site. Council anticipates further information will be provided at the Substantive stage that canvasses the matters presented below.

33. Applicants must submit financial modelling for any stormwater assets to be vested to Council, demonstrating sustainable lifecycle costs under the Local Government (Water Services) Act 2025, including revenue, investment, and financing sufficiency.

34. A downstream drainage assessment to determine existing risks such as tail water, flooding, and erosion is expected. Council recommends that the Applicant consider the key culverts (WEX, Puketaha Road, Gordonton Road, Sainsbury Road) identified in Figure 11 of Attachment 4 to the Application.

35. Council acknowledges the high-level Hydrologic Engineering Center River Analysis Software (HEC RAS) modelling undertaken by the Applicant in Attachment 4 and requests that detailed pre-development and post-development modelling be

undertaken to demonstrate that there will be no property flooding or access risks within the subject site and on surrounding landowners in a 100-year ARI event.

Reserves and Open Space

36. Council broadly supports the high-level outline of open spaces shown in the development masterplan.

37. Council expects streetscape and street tree planting to adhere to the Waikato Regional Technical Specifications (WRITS).

38. Footpaths shouldn't be included if they repeat the existing walking or cycling paths along roads. The landscape strategy suggests adding walking and cycling routes to reserve or stormwater areas, but this would duplicate the network.

Affected Neighbouring Landowners

39. The change in land use from Rural to Industrial may have an impact on neighbouring properties that needs to be considered.

40. WDC recommends that if this Referral Application is approved, that the Panel appointed by the Environmental Protection Authority adequately considers engagement with all adjoining properties with regards to reverse sensitivity, visual amenity, lighting effects, noise, hours of operation, and traffic movements.

Summary

41. Council is of the view that there is a competing application under the Act, being the R2 listed project.

42. The projected industrial land supply shortfall in Hamilton City is on a long-term horizon that can also be satisfied by other listed Fast-track projects on the Hamilton City periphery.

43. Council recommends that the Applicant consider and respond to the points raised in the joint Council and HCC Statement of Facts, dated 17 December 2025.

44. Council also recommends that the Applicant commence Development Agreement negotiations during the preparation of any potential Substantive Application.

45. Council is committed to continue working collaboratively with the Applicant, Future Proof Partners, and Government Departments through any potential Substantive Application.

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

Please upload comments directly via the portal by completing this template.

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).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

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More information on the fast-track approvals process and providing comments can be found at [Process overview](#) | [Fast-track website](#)

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

Project name	Greenhill Industrial Park
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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	Katrina		
*Last name	Andrews		
Postal address	Private Bag 3038 Waikato Mail Centre Hamilton 3240		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages. Waikato Regional Council (WRC) appreciates the opportunity to provide comments on this application for referral under the Fast-track Approvals Act 2024 (the Act). The following comments: - Respond to the matters under section 17(3) of the Act that a local authority must provide comment on (PART A); - Respond to the invitation to comment on the applicant's assertion that the development project will have significant regional benefits including "increasing industrial land supply that will contribute to addressing forecast shortfall and tenure constraints in the Hamilton City market." (PART B); and - Provide comment on some additional considerations relevant to the proposal (PART C).

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?

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

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

WRC can confirm that as of the date of this response, there are no competing applications or existing resource consents to which section 124C(1)(c) of the Resource Management Act 1991 (RMA) would apply if the approvals sought were to be applied for as a resource consent under that Act.

Further, WRC can confirm that 165ZI of the RMA does not apply because the proposed project is not located in the common marine and coastal area in accordance with the Waikato Regional Coastal Plan (proposed or operative).

PART B

SECTION 22

WRC was invited to comment on the applicant's assertion that the development project will have significant regional benefits including "increasing industrial land supply that will contribute to addressing forecast shortfall and tenure constraints in the Hamilton City market."

- Regarding the Minister's considerations under section 22(2)(a) of the Act relating to whether the project would have significant regional or national benefits, WRC considers that the only criteria of potential relevance to the project are whether it:
 - (iii) will contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020)*
 - (iv) will deliver significant economic benefits*
 - (x) is consistent with local or regional planning documents, including spatial strategies.*
- The Future Proof Business Capacity Assessment 2023 (BCA)¹ identifies a sufficient supply of industrial land in the short and medium term (1-10 years, as defined by the National Policy Statement on Urban Development 2020 (NPS-UD)), and a 114ha shortfall of industrial land in Hamilton City in the long-term (11-30 years). However, there are significant areas of industrial development proposed as part of other fast-track projects listed in Schedule 2 of the Act and applications that have been referred under the Act around the periphery of Hamilton (please

¹ Business Development Capacity Assessment 2023

refer to Attachment A which shows the current and proposed fast-track projects around Hamilton). Collectively, listed and referred projects (excluding the 180ha in this project) propose a total of approximately 266ha of additional industrial development²; exceeding the demand for industrial land identified in the BCA in the long-term. It should also be noted that while the BCA provides territorial authority-specific demand and capacity information, it recognises the integrated nature of the Waipā and Waikato districts with Hamilton City and states “At the total FPP³ level, the plan enabled capacity for retail and industrial land (plus a competitiveness margin) is sufficient to meet the anticipated growth needs over the long term”.

We consider the significant amount of industrial land supply proposed around the Hamilton periphery under the Act to be relevant context for assessing the benefits of this referral application. Considering the proposed project in relation only to the shortfall forecast in the BCA 2023 is overly simplistic and would overlook the current context in relation to the industrial market of Hamilton and the wider Future Proof sub-region. Additionally, if all these proposed projects were to be progressed over a similar timeframe, this may pose a challenge for ensuring the creation of a well-functioning urban environment, particularly in relation to cumulative impacts on infrastructure and servicing.

The proposed location of the Greenhill Industrial Park is also not in alignment with current strategic planning, as detailed below.

- The Greenhill Industrial site is located on eastern side of the Waikato Expressway (the opposite side to Hamilton City). The relevant strategic planning documents do not anticipate urban development on the eastern side of the Expressway in this location; the Expressway represents a clear boundary for urban growth within this area. This proposal has potential to lead to urban sprawl into a rural area which is not otherwise anticipated to be developed for urban purposes.
- The site meets the transitional definition of ‘highly productive land’ under the National Policy Statement for Highly Productive Land 2022 (NPS-HPL), with approximately 84% of the site comprising Land Use Capability (LUC) Class 2 soils based on NZLRI mapping. The requirements under Clauses 3.8-3.10 of the NPS-HPL will therefore be relevant to any substantive application. It may be challenging for the proposal to meet these requirements. The recent draft decision for the Ashbourne Fast Track application has highlighted the difficulty for development and use of land classed as LUC Class 2 through the current NPS-HPL provisions. In that draft decision it stated that “*There is no lawful pathway for locating the RV on highly productive land (HPL).*” Given the identified level of LUC Class 2 soils associated with this site a clear pathway through Clauses 3.8-3.10 of the NPS-HPL must be clearly demonstrated.

² Based on the application documents on the Fast-track website.

³ Future Proof partnership

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- WRC considers the project is inconsistent with criterion (x) under section 22(2)(a) of the Act relating to regional or local planning documents because the project site is not identified for future development in any regional or local planning documents or spatial strategies.

The Future Proof Strategy⁴ 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 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 Greenhill Industrial area has not been identified for growth in the Future Proof settlement pattern, which is also incorporated in the Waikato Regional Policy Statement (WRPS). The site is also not identified for development in the Waikato District Growth and Economic Development Strategy (Waikato 2070). Further comments in relation to the WRPS are provided below.

Waikato Regional Policy Statement

Te Ture Whaimana o Te Awa o Waikato

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

Urban form and development

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, whether it would contribute to well-functioning urban environments and how it would impact infrastructure capacity and contribute to infrastructure affordability.

⁴ Our strategic direction | Future Proof

Land and freshwater

The subject site contains LUC 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.

PART C

OTHER CONSIDERATIONS

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

Ecology

A comprehensive ecological assessment with detailed surveys, proposed mitigation measures and management plans for bats, lizards and birds will be required as part of any future substantive application.

Assessments will need to be undertaken to determine whether wetlands on the site are ‘natural inland wetlands’ as defined by the National Policy Statement for Freshwater Management 2020 and, if so, their loss should be avoided, values protected, and restoration promoted.

Acid Sulphate Soils

WRC’s preliminary regional Acid Sulphate Soils Probability spatial layer⁵ indicates a high probability of acid sulphate soils occurrence across part 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. 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.

It is recommended that the applicant develops a strategy for managing acid sulphate soils encountered during the various stages of construction and addresses this matter in detail within any substantive application.

⁵ Waikato region acid sulfate soils preliminary risk assessment | Waikato Regional Council

Wastewater and water supply

Regarding the management of wastewater, we note the applicant is in discussions with Hamilton City Council (HCC) regarding connecting to the municipal reticulated system.

Connecting to the HCC network for potable water seems to be the preferred option. WRC understands that the volume of water currently allocated to the Hamilton water supply does not include any volume for supply to this development. Therefore, an additional allocation may be required if the HCC water supply option is available. It is likely that the applicant will be required to seek a water permit to facilitate this option.

An additional source of water is proposed, with on-site groundwater supply to provide water for both dust/construction and firefighting purposes. Rainwater harvesting is also proposed to reduce water demand from other supply sources. This activity will require consent to divert and take surface water.

The property is located within the Hamilton Basin – North groundwater management level area. Given the current allocation level for this management level area, it is likely that there is ample allocation available to provide for a groundwater take consent allowing volumes that are reasonably commensurate with the indicated purposes – dust/construction and firefighting – for the scale of the proposed development.

Land drainage

The project site is located within WRC's Waikato Central Land Drainage Scheme, which includes several rural drains in and around the development area. 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. Given that rural drains are not designed for urban runoff, it will be imperative that the proposed development mitigates stormwater runoff for volume retention. This may be a key limiting factor for the proposed development. Additionally, access to WRC's Land Drainage Scheme is required for all rural drains within the area for maintenance activities. This can be accommodated via appropriate conditions of consent on any subdivision or land use consent should the proposal go ahead.

Stormwater

In terms of the stormwater management, the information provided in the referral application is very high level and lacks detail. Although we note that the proposed stormwater philosophy is consistent with what WRC would expect to see, achieving those targets and criteria may be challenging based on the existing environment and, in particular the hydrological conditions as the groundwater is high and there are peat/organic soils present throughout the site.

As the site is serviced and managed by WRC's rural drainage scheme, volume retention is critical for the site. As industrial developments have a significantly high imperviousness, this makes it even more difficult to remove the new urban volumes from these rural drains. The applicant is proposing to use a combination of soakage and on-lot water reuse, however achieving this volume reduction in reality will be difficult.

Public transport

The proposal's location on the eastern side of the Waikato Expressway represents an urban expansion that has not been planned for in existing growth and transport planning. The proposed introduction of almost 180ha of additional industrial development to a rural area would have implications for the transport network and for the provision of additional roading, public transport, walking and cycling services and infrastructure that is not planned for or funded.

The proposal's proximity to the Waikato Expressway and the Ruakura Inland Port would make use of existing and planned transport infrastructure that can support industrial activities, particularly with regard to supporting the movement of freight.

It is important that the project aligns with the strategic direction set out in the Regional Land Transport Plan and the Regional Public Transport Plan (RPTP), both of which emphasize enabling well-connected, accessible, low-emission, multi-modal transport networks. The RPTP also emphasizes the need to future proof new urban areas so that efficient, reliable and attractive public transport services can be developed as populations grow and travel demand increases.

Attachment 10 of the referral application indicates the proposal could include connections to the wider walking and cycling network as well as an internal network, internal road intersections to accommodate large vehicles, and discusses the possibility of an on-demand shuttle service and potential scheduled service provision over time. It is essential that connections are made into these networks. To support this, we recommend further detailed consideration of:

- Early visibility of proposed on demand or bus routing, staging and funding, and how any services would tie into the wider network particularly given the sequencing of development across the area from south to north.
- Inclusion of public transport enabling infrastructure such as appropriately located and designed bus stop pairs with pedestrian access and safe crossing points, shelters and provisions for accessible boarding.
- Ensuring the internal road layout is fit for future bus routes including consideration of carriageway widths and turning geometry and the weights of electric vehicle buses.
- Ensuring early transport infrastructure connections into the city network and the proposed R2 growth cell for active modes of transport to access the site and the continuation of these within the development area. The Expressway creates a significant barrier between the urban area and this proposed development. The proposal will need to address how to provide quality links that address this barrier.

We recommend that discussions be held with WRC's Transport Strategy and Delivery team and Hamilton City Council as any substantive application progresses. These would support refinement of street layouts and integration of future public transport services and active modes in a way that is consistent with regional and local transport objectives and aspirations for a well-functioning urban environment.

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Earthworks

- Any land disturbance activities should be undertaken with regard to WRC's Erosion and Sediment Control Guidelines and an approved Earthworks and Sediment Control Plan. This plan should also include appropriate management practices should acid sulphate soils be uncovered during initial earthworks.

Waikato Regional Plan

- The proposed development will trigger a wide variety of activities under the Waikato Regional Plan and will subsequently require several associated resource consents. We recommend the applicant undertakes early discussion with WRC on these activities.

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.

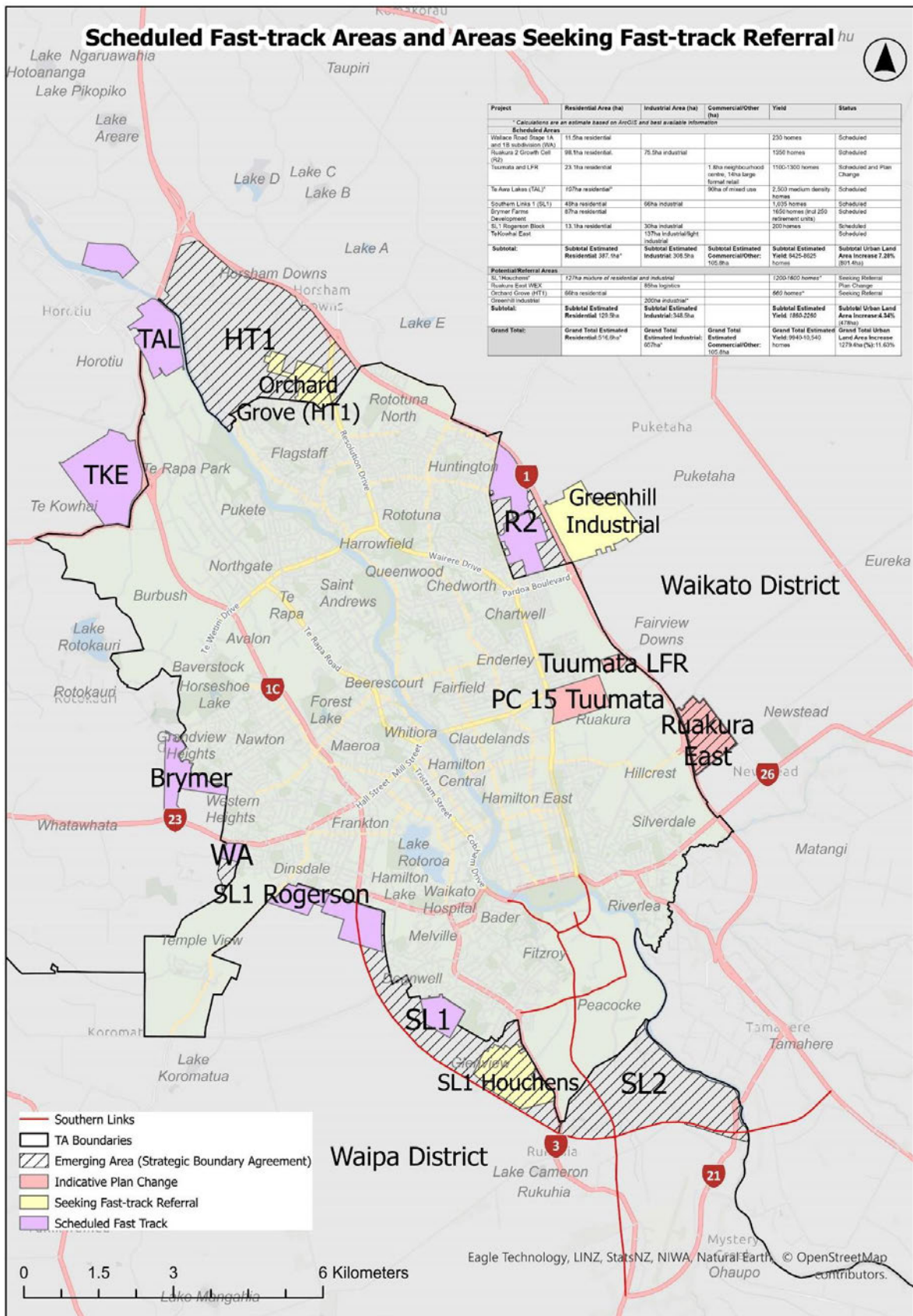
Managers signoff



AnaMaria d'Aubert

Date 21 April 2026

Manager – Regional Consents



Hon James Meager

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



16 APR 2026

JMITC-43

Hon Chris Bishop
Minister for Infrastructure

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

Dear Chris,

Thank you for your invitation to comment, as the Associate Minister of Transport, on the referral application for Greenhill Industrial Park [FTAA-2602-1171].

The Greenhill Industrial Park project aims to establish a regionally significant industrial hub that would have a positive impact on economic activity and employment while increasing housing capacity.

I consider this project has significant regional benefits, and I therefore support the Greenhill Industrial Park application being referred to the Fast-track Approvals Act process.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'James Meager', followed by a large, stylized flourish.

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

From: [Infrastructure Portfolio](#)
To: [FTArefferrals](#)
Subject: FW: Invitation to comment on Fast-track referral application for the Greenhill Industrial Park under the Fast-track Approvals Act 2024 – FTAA-2602-1171 - For Minister's Office
Date: Tuesday, 31 March 2026 10:13:57 am

From: Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Sent: Tuesday, 31 March 2026 9:17 AM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: RE: Invitation to comment on Fast-track referral application for the Greenhill Industrial Park under the Fast-track Approvals Act 2024 – FTAA-2602-1171 - For Minister's Office

Good morning,

Confirming Minister Goldsmith has no comment

Kind Regards,



Office of Hon Paul Goldsmith
Minister for Arts Culture and Heritage | Minister of Justice
Minister for Treaty of Waitangi Negotiations | Minister for Media and Communications

Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Friday, 20 March 2026 8:59 am
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Hon Shane Jones <Shane.Jones@parliament.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>; James Meager (MIN) <J.Meager@ministers.govt.nz>
Cc: FTArefferrals <ftarefferrals@mfe.govt.nz>
Subject: Invitation to comment on Fast-track referral application for the Greenhill Industrial Park under the Fast-track Approvals Act 2024 – FTAA-2602-1171

To:

- Minister for Economic Growth
- Minister for Regional Development
- Minister of Conservation
- Minister for the Environment
- Minister for Arts, Culture and Heritage
- 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 Greenhill Industrial Park Consortium for referral of Greenhill Industrial Park project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2602-1171).

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, being 21 April 2026. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

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

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

Process

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

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

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

Important Information

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

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

Project summary

Project name	Greenhill Industrial Park
Applicant	Greenhill Industrial Park Consortium – the Consortium is made up of four key landowners: McDonald Farming Enterprises Limited, Responsive Trade Education, Flnlay Family Partnership and GT Taylor Family Trust.
Location	Northeast of Hamilton
Project description	The project will construct a new industrial park on approximately 180 hectares of land located northeast of Hamilton adjacent to the eastern side of the Waikato Expressway within the Waikato District. The project includes: 1. approximately 161 new industrial lots, with a range of sizes from 2,500m² and above

- | | |
|--|---|
| | <ul style="list-style-type: none">2. 25 new rural residential lots3. additional components, including:<ul style="list-style-type: none">i. a new north-south orientated collector road (connecting with Puketaha Road to the north and Greenhill Road to the south) and a series of new local roadsii. four stormwater pond areas, including a larger centralised area that will also contain a new central wastewater pumpstation. |
|--|---|

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

Email disclaimer:

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Confidentiality notice: This email may be confidential or legally privileged, and it does not necessarily reflect the official view of the Ministry for Culture and Heritage. If you have received it by mistake, please tell the sender immediately by reply, remove this email and the reply from your system, and don't act on it in any other way. Ngā mihi.



Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0030610

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (FTAA) on the following applications:

- Out of Scope
- Greenhill Industrial Park (FTAA-2602-1171)
- Out of Scope

I am providing comment in my capacity as Minister for Economic Growth, focusing on whether the applications are likely to deliver significant economic benefits under section 22(2)(a)(iv) of the FTAA, based on the economic assessments provided by the applicants.

Out of Scope



Greenhill Industrial Park, FTAA-2602-1171

This application is for the establishment of a master-planned industrial park at Puketaha, immediately east of Hamilton City and adjacent to the Waikato Expressway (State Highway 1). The proposal covers approximately 181 hectares and enables the staged delivery of around 161 industrial lots and 25 rural-residential lots supported by new internal roading and supporting infrastructure.

According to the economic assessment provided by the applicant, the proposal is estimated to deliver a one-time increase in gross domestic product of approximately \$830 million over an estimated ten-year development period, including flow-on effects. Construction and development activity is estimated to support approximately 5,420 full-time equivalent job-years, equivalent to sustaining around 542 people in full-time employment over the development period and generate approximately \$479 million in additional household incomes. At full build-out, the applicant estimates the industrial park could sustain significant levels of ongoing economic activity.

The primary economic benefits would be realised during the development phase, while longer-term benefits would arise from the provision of a large quantum of serviced industrial land adjacent to a major transport corridor, supporting ongoing industrial activity and improving the availability and timely supply of industrial land in the Hamilton region.

Out of Scope

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis', is positioned above the printed name.

Hon Nicola Willis
Minister for Economic Growth

Hon Shane Jones

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



23 April 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act 2024 – Greenhill Industrial Park referral application (FTAA-2602-1171)

Dear Chris,

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

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

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

Yours sincerely,

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

Hon Shane Jones
Minister for Regional Development

Annex One – Regional Development comments

Project overview

1. The applicant, Greenhill Industrial Park Consortium, is seeking referral under the Fast-track Approvals Act 2024 to progress its Greenhill Industrial Park project. The proposed project is to develop approximately 181 hectares of land in Puketaha, Waikato (around 8 kilometres northeast of Hamilton city centre) into 161 industrial lots and 25 rural-residential lots.
2. According to the independent economic assessment provided by the applicant, the project is estimated:
 - a. over the expected 10-year development period, to provide a gross domestic product (GDP) boost of approximately \$830 million, employment for 542 people, and additional household incomes of \$479 million;
 - b. once the development is complete, to sustain full-time employment for 3,555 people (with \$265 million paid annually in salaries/wages) and additional annual GDP of \$471 million.
3. The economic assessment claims that the proposed development will put the land to its highest and best use and sets out that an alternative use from rural production would have negligible economic impacts in comparison. The economic assessment also indicates that the development would respond to future regional demand for industrial space, providing additional economic benefit.

Regional Development comments

4. Based on the information provided, the proposed 10-year development period would offer important employment and a one-time GDP boost for the region. However, for context, Hamilton's GDP for the year ending March 2025 was estimated as \$17.06 billion (source: Infometrics), so the expected average annual GDP boost of \$83 million across the project's 10-year lifetime could be considered modest.
5. The ongoing economic value of the development once complete is likely to be significant for the region for both the employment and GDP impacts from the industrial activity supported by the new development's infrastructure.
6. It may be difficult to confirm that the proposed development will put the land to its highest and best use, without understanding and analysing the full range of options that the land could be used for, which the application does not do. The application also does not analyse whether the use of resources at the new development may directly compete with – and impact on the success of – other existing industrial parks, which would affect the accuracy of the proposed 'additional' benefits. If these are important factors in your referral decision, I recommend you seek further information from the applicant.

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

Project name	Greenhill Industrial Park
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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	Department of Conservation		
*First name	Shawn		
*Last name	Gardner		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz ;		

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

Manager’s signoff



Celia Haden
Acting Manager Fast-track Applications

2 April 2026

Director-General of Conservation s17 comments

Project name	Greenhill Industrial Park
Applicant name	Greenhill Industrial Park Consortium
Application number	FTAA-2602-1171
Project summary details	The Project is to construct and establish a new industrial park on approximately 180 hectares of land located northeast of Hamilton adjacent to the eastern side of the Waikato Expressway within the Waikato District. No Public Conservation Land has been identified within the Project area. However, the Title for Lot 1 DP 515771 notes that the site is Subject to Part IVA of the Conservation Act 1987. Wildlife approval is sought under the Wildlife Act 1953.

1 General comment

- 1.1.1 As the project includes an approval under a specified Act for which DOC is the administering agency -- and the referral application was lodged prior to the March 31st start date for changes to referral consultation under the Fast-track Approvals Amendment Act 2025 -- the applicant was required to undertake pre-lodgement consultation in accordance with section 11(e) of the Fast-track Approvals Act (FTAA).
- 1.1.2 Formal pre-lodgement consultation on this application commenced on the 4th of November 2025 and formal comments were provided to the applicant on the 28th of November 2025. DOC received the request for s.17 comments on the 30th of March 2026.
- 1.1.3 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, DOC considers that it is likely that, with the appropriate design and conditions, effects can be managed to appropriate levels.
- 1.1.4 DOC is not aware of any reason the project should not be referred.

2 Minister's decision on referral application

- 2.1.1 Sections 21 and 22 of the FTAA set out matters to be considered in determining whether a referral application should be accepted.
- 2.1.2 DOC notes that other agencies are better placed to comment on most matters, including those in section 22. Comments below are therefore targeted to sections where DOC has specific interests or information relevant to the Minister's decision.
- 2.1.3 DOC has the following comments on sections 21(3) and (4), and section 22:

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	DOC has considered section 5(1)(f), (h), (i), (j) and (k). DOC has not identified any aspect that would be considered ineligible under these sections.
21(3)(c)	Is there adequate information to inform a decision	The applicant provided a site plan and a high-level ecology scoping report which details preliminary findings about the ecological setting of the project area. This report indicates the likely presence of lizards onsite, the possible presence of bats and noted several waterways and the presence of wetlands onsite. The applicant has not indicated a need to obtain Freshwater Fisheries approvals and there is not enough information at this stage to determine if an approval is required. In its pre-lodgement consultation summary (provided on 28 November 2025) DOC noted that the applicant should be aware of the Freshwater Fisheries Regulations and apply for any necessary approvals. If the project is referred, detailed ecological surveys (including for lizards, fishes, and avifauna) should be done with methodologies and results provided in the substantive application. This will inform what wildlife approvals will be required for the project. Confirmation should be provided in the substantive application of any works proposed within waterways or wetlands, including enhancement activities. It is recommended that the applicant provide a stocktake of any current fish barriers onsite and advice of any works to remove or alter them. DOC notes that the Title for Lot 1 DP 515771 indicates that the site is subject to Part IVA of the Conservation Act 1987. The applicant has not provided enough information to DOC to understand whether this contains qualifying water bodies that would require the creation of a marginal strip under this instrument. This issue is explored in greater detail in the discussion

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Section	Criteria	Comments
		under s.22(b). DOC considers the information to be 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: • Ngāti Tuwharetoa and Te Arawa River Iwi Waikato River Act 2010; • Nga Wai o Maniapoto (Waipā River) Act 2012; • Waikato Tainui Raupatu Claims (Waikato River) Settlement Act 2010; • Ngāti Hauā Claims Settlement Act 2014 The project sits within the co-governance area for the Waikato and Waipā rivers. Strategic documents such as those produced by the Waikato River Authority will be relevant to the project.
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 wildlife approval should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Based on our knowledge of the existing environment and species to occur on the site, our understanding of the project, and our experience of the kinds of measures and conditions that could be implemented, we consider that once more detailed information is available, it would be possible to achieve a project, with the imposition of conditions (that are appropriate, enforceable, include best management practice, and apply the relevant ecological management plans, where required), that does not have significant adverse effects on the environment.
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.

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2.1.4 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?	A Wildlife Act Approval would generally take approximately three to four months to process, which is not significantly longer than the FTAA process is expected to take. However, there may be benefits to the applicant in terms of consideration being combined with RMA approvals (rather than being advanced by a separate process) and given the different decision-making framework under the FTAA.
22(2)(a)(ix)	Will this project address significant environmental issues?	Not applicable.
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	In making this assessment, DOC reviewed the conservation-related matters contained within the following Statutory Planning documents: • Ngāti Tuwharetoa and Te Arawa River Iwi Waikato River Act 2010; • Nga Wai o Maniapoto (Waipā River) Act 2012; • Waikato Tainui Raupatu Claims (Waikato River) Settlement Act 2010; • Ngāti Hauā Claims Settlement Act 2014; • Conservation General Policy 2005; • Waikato Conservation Management Strategy 2014. The application is not inconsistent with the relevant statutory planning provisions. However, consideration needs to be given to: • The protection of freshwater and customary fisheries, historic places and resources and taonga species; • Te Ture Whaimana o Te Awa o Waikato (The Vision and Strategy for the Waikato River) with respect to streams which are tributaries of the Waikato River; • Maintaining and restoring the ecological integrity of relevant ecosystems and habitat types;

Section	Criteria	Comments
		• Conserving any threatened and at-risk species to ensure their persistence; • Protecting freshwater fish habitat, fish passage, and the maintenance of habitat connectivity and water quality of any waterway.
22(b)	Any other matters the Minister may consider as relevant?	The Title for Lot 1 DP 515771 notes that the site is subject to Part IVA of the Conservation Act 1987. Part IVA of the Conservation Act reserves marginal strips of 20 metres wide in perpetuity along the margin of any qualifying water body on any parcel of land that was once Crown Land. The existence of this notation on the Title means that if a qualifying water body exists on the property, a marginal strip is automatically reserved along that water body. DOC understands this would fall within the definition of 'public conservation land' under the FTAA. It is unclear to DOC from the level of information provided whether a qualifying water body under s.24(1) of the Conservation Act exists on the subject property. It is therefore unclear whether there is any qualifying public conservation land within the project site. We understand that for any project that includes public conservation land, DOC is required to provide a s.19 report detailing any risks and liabilities to the Crown and potential issues in relation to referral. At the time of writing, DOC has not received a request for a s.19 report for this project, which may be reflective of the ambiguity regarding whether public conservation land is included within the project site. We therefore highlight this potential issue here in order to provide the Minister with any known potential issues at this stage. DOC does not consider this a reason that the project should not be referred. However, DOC recommends that surveys be undertaken on the subject property to identify any potentially qualifying water bodies.

3 Other considerations

- 3.1.1 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 a substantive application. In some cases, it has been necessary for applicants to seek additional approvals via normal processing. This can result in inefficiencies, additional costs and undermining the benefits of the 'one stop shop' approach of the FTAA.
- 3.1.2 DOC considers it may be beneficial for the applicant to consider whether it should seek to include additional approvals that would potentially be required on a precautionary basis. To this end, DOC suggests the Minister consider whether further information should be sought from the applicant under s20 prior to making their decision to ensure all approvals in scope of the FTAA and necessary to implement the project are included.
- 3.1.3 DOC recommends consideration of whether any culverts or works within waterways might require complex freshwater fisheries approval, as highlighted to the applicant during pre-lodgement consultation.
- 3.1.4 DOC recommends consideration is given to whether bats and birds should be included in the scope of wildlife, or other, approvals sought. Details of the potential approvals required were provided to the applicant as part of the preliminary consultation process.
- 3.1.5 Given the lack of specific 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 a substantive application. Benefits include ensuring information necessary to support decision-making with respect to conservation approvals is included; supporting the management of any actual or potential adverse effects on the environment; and early identification and resolution of any issues.

4 Matters for the Minister to specify (s27)

If the project is referred, it is recommended the Minister request the applicant provide the following information in the substantive application:

- A Lizard Management Plan;
- A survey of Lot 1 DP 515771 to identify any qualifying waterways under Part IVA of the Conservation Act;
- A full ecological assessment, including assessment of actual and potential effects on vegetation, wetlands, freshwater and fauna, including avifauna, lizards and bats. Specifically, the ecological assessment should include baseline surveys for wetlands, fishes, bats and lizards, and a baseline avifauna survey which includes species presence and abundance and flight pathways (including for nocturnal and migratory species). Note that surveys for bats need to be done during the bat season (October – April) when night-time temperatures are warmer. If bats are found to be present, a bat management plan that sets out how the project will avoid the loss of roost trees, mitigate for the loss of vegetation, and address effects of lighting and noise;
- Details of proposed avoidance and mitigation measures to address effects on ecological values;
- Proposed consent conditions, including details of pre- and post-construction monitoring for the populations of avifauna, lizards and fishes, and for bird and bat collisions;
- If necessary, complete details of any proposed offsetting and compensation measures which are adequate to fully address adverse effects identified in the ecological assessment;
- An outline of consultation with DOC, iwi, and any relevant landowners, including any feedback from the same and an explanation of how that feedback has been addressed.



Celia Haden
Acting Fast-Track Applications Manager

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

Date: 2 April 2026

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



Comments on a referral application under the Fast Track Approvals Act 2024

Greenhill Industrial Park, FTAA-2602-1171

Contact Details	
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)
Contact person	Ben Henson
Contact Number	s 9(2)(a)
Email	fasttrack@heritage.org.nz

General Comments

1. Greenhill Industrial Park Consortium (the Applicant) has lodged an application for referral of the Greenhill Industrial Park (the Project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. In accordance with section 17(1)(c) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the referral application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.
3. HNZPT has been provided application documents that are relevant to the archaeological authority application and the resource consent application, insofar as it affects historic heritage. These have been assessed and HNZPT comments as follows:

Consultation and Engagement

4. The applicant requested consultation on 11 February 2026. HNZPT provided a response by email on 19 February 2026 requesting additional information on the assessment of effects on archaeological values and recommending that an archaeological management plan be provided with the application.
5. Consultation has been undertaken with Ngaati Hauaa, Ngaati Wairere and Waikato/Tainui. A letter of support for lodgement has been provided by Ngaati Hauaa and Ngaati Wairere. Ngaati Wairere, Ngaati Hauaa and Waikato/Tainui will provide a CVA at a later date.

Archaeological Authority Application

6. If the project is referred, an archaeological authority is required and HNZPT anticipates further engagement with the Applicant to ensure all relevant documentation is provided with a substantive application, including:
 - A fulsome archaeological assessment;
 - Appropriate methodologies and strategies proposed;



- Appropriate draft archaeological management plan;
- Evidence of appropriate consultation with tangata whenua; and
- Appropriate proposed conditions.

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

Please upload comments directly via the portal by completing this template.

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).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

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All information held by MfE is subject to the Official Information Act 1982.

More information on the fast-track approvals process and providing comments can be found at [Process overview](#) | [Fast-track website](#)

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

Project name	Greenhill Industrial Park
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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)	Hamilton City Council		
*First name	Juliana		
*Last name	Reu Junqueira		
Postal address	Private Bag 3010, Hamilton 3204		
*Contact phone number	s 9(2)(a)	Alternative	s 9(2)(a)
*Email	s 9(2)(a)		

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

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

Managers signoff



Dr Juliana Reu Junqueira

Date: 20 April 2026

20 April 2026

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

Dear Ilana

FAST-TRACK PROPOSAL: Greenhill Industrial Park - Reference FTAA-2602-1171

Thank you for the invitation to provide written comments on the Greenhill Industrial Park referral application under the Fast-track Approvals Act 2024.

The comments below summaries key matters already recorded in Hamilton City Council's Statement of Facts for Greenhill Industrial and highlight the risks and dependencies that in our view, should shape both any referral decision and the information requirements for a substantive application.

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

Kind Regards,



Dr Juliana Reu Junqueira
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:

The applicant has submitted a substantial suite of technical assessments to the Ministry for the Environment seeking referral under the Fast Track Approvals Act (the Act) covering matters including urban design, urban form, transport, ecology, three waters servicing, geotechnical conditions, acoustic, contaminated land and cultural values. Hamilton City Council (HCC) officers have reviewed the submitted material to understand its scope and to consider how it engages with the matters raised in the Statement of Facts letter and the Future Proof feedback memorandum.

The review does not assess the acceptability of the technical material or draw conclusions at this stage. Instead, Council officers' consideration of technical reports identifies matters that will require further focus for the Minister's consideration should the proposal proceed to the substantive application stage, having regard to the Minister's decision-making framework under sections 21 and 22 of the Act¹, particularly in relation to:

a) Strategic alignment

The proposal relies on proximity to the Waikato Expressway and Ruakura 2 (R2) Growth cell to justify its location. However, the site remains outside areas identified for urban development in the Future Proof Strategy and Waikato Regional Policy Statement. This matter is relevant to the criteria in section 22(2)(a)(x) of the Act, which requires consideration of consistency with local and regional planning documents.

b) Land use interfaces

Rural residential lots and buffers are proposed to manage industrial interfaces, but there is currently limited certainty around their effectiveness, permanence and ability to avoid long-term reverse sensitivity effects. This is relevant to the considerations in section 22(1)(b)(i) of the Act, including whether the fast-track approvals process provides an appropriate framework to manage long-term land-use compatibility outcomes.

c) Transport

The development would place significant demand on the Greenhill interchange and wider network. While an assessment to evaluate transport and traffic implications are provided, key matters relating to staging, timing, funding and delivery of upgrades, including the Puketaha Road connection, remain unresolved. These matters are relevant to the considerations set out in sections 22(1)(b)(i) of the Act.

¹ MFE. Fast-track Approvals Act 2024. Section 21 - Minister's decision on referral application & Section 22 - Criteria for assessing referral application.

d) Infrastructure capacity

Servicing strategies are outlined, but confirmation of water and wastewater capacity, timing of required upgrades, and integration with wider growth area servicing, including R2, remain uncertain.

There is little to no capacity in existing HCC water and wastewater networks available to the development given that it sits outside of Hamilton City boundaries and has not previously been factored into integrated future growth plans for and by the city, and neighbouring relevant authorities. Accordingly, no guarantees can be made as to connectivity to those networks. Network hydraulic modelling may identify the impacts of the development demands on the networks, and the extent of upgrades or new infrastructure needed to accommodate those impacts.

R2 is being serviced as a separate water supply zone, with infrastructure provision addressed through a standalone Fast-track application. It is, however, possible that there may be some synergies between Greenhill and R2 (e.g. the provision of extra land within R2 for a second reservoir to service Greenhill Fast-Track industrial zone). Any such integration would require further investigation and coordination and does not remove the current uncertainty relevant to the referral decision under sections 21 and 22 of the Act.

Key Strategic Considerations

The sections below summaries key strategic, infrastructure and integration matters already identified through early engagement recorded in the Greenhill Industrial Statement of Facts letter. These matters build on the preceding context and are intended to highlight the key considerations arising from Council's review of the proposal. These issues represent material considerations that are directly relevant to the Minister's decision on whether the proposal is suitable for referral under the Act, and if referred, what information and safeguards would be required at the substantive application stage. A detailed consideration of section 22 criteria is set out later in this response to the Minister, the matters below provide the relevant context for those considerations.

Strategic Land Use and Strategy Alignment:

The Minister is advised that the Greenhill Industrial site is not identified for urban or industrial development in either the Future Proof Strategy or the Waikato Regional Policy Statement and has not been subject to prior structure planning or strategic investigation for urbanisation as illustrated in **Appendix 1**, which shows the site in relation to the other listed, referred and referral application areas.

While the site is located adjacent to Hamilton's eastern growth areas, proximity alone does not equate to strategic alignment. The proposal represents an unplanned extension of industrial development into rural land, outside the agreed long-term growth framework for the sub-region. Although industrial land demand pressures in Hamilton City are recognised, they are expected to materialise over the long term. The city's projected future shortfall highlights limited capacity within its boundaries however, based on applications to date, three additional

Fast-track projects situated on the city's periphery, have been listed or referred under the Fast Track Approvals Act 2024, including Ruakura 2 (listed), SL1 Rogerson (referred) and Te Kowhai East (referred), which may contribute to addressing future industrial land supply needs.

The site comprises Highly Productive Land (LUC Class 2 and 3). As such, the National Policy Statement for Highly Productive Land (NPS-HPL) is directly relevant, and any conversion to urban industrial use requires careful scrutiny. The absence of prior strategic allocation heightens this concern.

Relationship of the Proposal to the Strategic Growth Framework:

The proposal should not be viewed in isolation nor as a logical next stage of planned growth. Unlike other fast-track proposals (such as Orchard Grove within HT1 or Ruakura 2), Greenhill does not form part of an identified growth cell, nor is it supported by an agreed spatial framework.

The Waikato Expressway establishes a deliberate urban growth boundary for Hamilton at the boundary of the adjoining R2 growth cell. Development east of the Expressway creates a risk of ad hoc urban expansion, eroding the strategic function of the Expressway and increasing pressure for further rural land conversion beyond an agreed planning framework. This context is represented in **Appendix 2** which reflects strategically identified future urban areas in the Future Proof mapping.

Integrated approach:

An integrated, cross-boundary planning approach has not yet been established for this area. Although the site sits within Waikato District, the proposal generates significant cross-boundary effects for Hamilton City, particularly in relation to:

- i. Transport network performance
- ii. Three waters servicing demand and sequencing
- iii. Land use compatibility and industrial form
- iv. Long-term urban form east of Hamilton City

At present, there is no agreed masterplan or structure plan that integrates land use, transport, stormwater, and servicing outcomes across the wider area.

Three Waters servicing:

Responsibility for three waters servicing discussions sits with IAWAI Flowing Waters, the joint waters CCO established by Hamilton City Council and Waikato District Council (WDC). The Minister is advised that there is no guaranteed servicing solution for the proposal at this stage.

a) Water supply

There is no confirmed water supply servicing pathway for the site. Any reliance on Hamilton's networks would require significant investigation, network modelling and upgrades, all of which would need to be fully funded by the applicant. Additionally, for the location and scale of this development, a dedicated water storage reservoir for

security of supply, and available flow and pressure (including for firefighting provisions apt to an industrial complex) is expected to be required.

b) Wastewater

There is no reserve capacity in Hamilton's wastewater network, and no existing Waikato District Council wastewater network in this location. Despite the site's relative proximity to Hamilton, there are limited feasible connection options available when the development is considered in its entirety. Connection feasibility, staging and funding remain unresolved. Onsite or fragmented wastewater solutions are not supported as a sustainable long-term outcome for development of this scale.

c) Stormwater

Stormwater management must respond to the wider catchment context, not solely the subject site. The key issues include:

- i. Achieving hydraulic neutrality and required retention volumes
- ii. Avoiding adverse effects on the Waikato Central Drainage Scheme
- iii. Managing wetland loss in accordance with national and regional policy
- iv. Ensuring stormwater solutions do not compromise downstream networks or future development options

The site is partially within the Kirikiriroa Integrated Catchment Management Plan (ICMP), which discharges to the Waikato River. This ICMP along with Te Ture Whaimana, District & Regional Plans and relevant infrastructure standards form the framework for development of appropriate stormwater infrastructure. It is expected that:

- i. The application should demonstrate alignment with the objectives of Te Ture Whaimana, and the Waikato-Tainui Environmental Plan.
- ii. All proposed stormwater infrastructure should be developed in accordance with the Kirikiriroa ICMP, HCC and WDC Operative District Plans, Waikato Regional Plan, and the Waikato Regional Infrastructure Technical Specification (RITS).
- iii. All potential impacts to areas both downstream and upstream of the proposed development site are fully quantified, and that proposed infrastructure adequately identified impacts.
- iv. Stormwater infrastructure solutions are integrated with ecological & biodiversity outcomes with the intent of achieving restoration of the Waikato River & its tributaries.

Transport

Transport implications of the proposal are significant and strategic, extending beyond local road effects. Original Waikato Expressway (WEX) modelling assumed non-urban land use east of the corridor. The proposal would generate traffic that directly impacts the Greenhill interchange, Pardoia Boulevard, Puketaha Road, and wider Hamilton city network. Substantial upgrades are likely to be required.

There are no funded projects in current investment programmes to address these impacts, meaning costs would fall to the applicant. Without comprehensive, network-wide modelling and staging clarity, there is a risk of degrading the performance of regionally significant transport infrastructure.

It is also important that cumulative effects such as the impact of this proposal in combination with other large proposals in the vicinity like the adjoining Ruakura 2 application are identified and incorporated into mitigation. These matters are complex and should be reflected in the scope and timeframes of any substantive application process. A key example would be the effect of development at the subject site acting in combination with other new development in the vicinity like R2, which together may trigger a different order of traffic effect on the Waikato Expressway, and potentially degrade its regional connector function. Such an effect needs to be properly identified and then mitigations assessed and incorporated into conditions attached to any consent.

An Integrated Traffic Assessment will be essential in understanding the impacts of the development to the highway network, such as the Waikato Expressway, and interaction with local roads (both HCC and WDC) and timing of such impacts. Safety elements will need to be incorporated in the design and construction, particularly for mitigation of 'off-site' impacts. It is expected that as a result the Applicant will be responsible for significant upgrades to local roads, including the 'urbanisation' of existing predominantly rural and local roads.

Geotechnical considerations

The site is underlain by peat and other soil types (as reported in the Preliminary Geotechnical Report). Development will require significant bulk earthworks and modification including consolidation and replacement of peat, with a net importation of material expected to exceed 100,000 cubic metres. Careful design will be required to manage consolidation effects against intended groundwater recharge and drainage, and to avoid unintended consequences, especially where acid-sulphate conditions may be present.

The preliminary geotechnical report identifies parts of the site identified as susceptible to liquefaction during seismic events and are categorised as having high natural hazard risk.

Urban Form

If referred, the proposal would represent an extension to the north-east of Hamilton's urban footprint and would function as part of the city's urban form. While the site is located within Waikato District, the proposal should be assessed and designed in a manner consistent with long-term urban form expectations for the city. A key consideration to ensure the area functions effectively as part of Hamilton City will be to ensure effective connections across the expressway. This will be a challenge as the Expressway is a formidable barrier, and it is imperative the site does not function as a standalone and isolated urban area.

The form and layout of the proposed industrial development will materially influence long-term outcomes at the rural - urban edge.

Key considerations include:

- i. Interface treatment with surrounding rural land
- ii. Quality and width of buffers and open space
- iii. Avoidance of low-amenity, residual landscapes
- iv. Alignment with future industrial design expectations should the area urbanise further over time

Early concept material does not yet demonstrate how high-quality, enduring industrial environments would be achieved in this location.

Reverse sensitivity

HCC does not support the inclusion of any residential or rural-residential component within the Greenhill Industrial proposal.

The level of reverse sensitivity risk is high given the nature, scale and operational characteristics of industrial activities anticipated for the site. Introducing residential or other sensitive land uses within, or immediately adjacent to, an industrial area would:

- i. Constrain the long-term efficiency and operation of industrial activities
- ii. Generate ongoing land-use conflict related to noise, lighting, traffic movements, air quality, and hours of operation
- iii. Undermine the intended function and economic role of the proposed industrial area

These risks are amplified by the site's location outside an established urban framework, the absence of an agreed structure plan, and the proximity to functioning rural land uses. From a strategic planning perspective, industrial developments of this scale should be planned as exclusively industrial environments, with reverse-sensitivity effects managed through appropriate buffers, setbacks, and interface treatments to rural land.

HCC's clear position is that the proposal should be amended to remove all residential or lifestyle components and be limited to a full industrial land-use outcome.

Consenting strategy: Key matters that would need to be addresses through any consent granted.

If the project is referred to the Fast Track approvals process, the Minister is advised that strong and explicit conditions will be essential to lock in an industrial-only outcome and to manage the strategic risks identified above.

As a minimum, any substantive application should be required to:

- a) Confirm that only industrial and associated non-sensitive activities are consented, with residential, rural-residential and other sensitive uses excluded
- b) Provide a Development Framework Plan that controls:
 - i. Industrial land-use typologies

- ii. Buffers and interface treatments to rural land
 - iii. Building envelopes, setbacks, and servicing corridors
- c) Address reverse sensitivity effects primarily through appropriate master planning and generous buffering, not reliance on future rezoning or case-by-case consenting
 - d) Align staging with confirmed transport and three-waters infrastructure delivery, tied to clear trigger thresholds that extends to mitigation of the proposal's cumulative impacts.

Conditions should avoid open-ended pathways that could later enable sensitive use through incremental change or reinterpretation.

Section 22 of the Fast Track Approvals Act

Section 22 of the FTAA lists the criteria for accepting a referral application. Section 22(1)(b) specifically asks the Minister to consider whether the fast-track approvals process:

- a) Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and
- b) Is unlikely to materially affect the efficient operation of the Fast-Track approvals process.

There are significant uncertainties around effects triggered by this proposal that may not be resolved within the timeline of the Fast Track process. They relate chiefly to the cumulative impact of the proposal on the functioning of the Waikato Expressway and the absence of water and wastewater networks and capacity.

The way in which the transport impact of this proposal, in addition to the Ruakura 2 proposal and other background development in the vicinity acts is complex but potentially results in a detrimental effect on the functioning of the Expressway. It is vital that such effects are identified and assessed, and mitigations assigned to ensure negative externalities such as allocation to tax ratepayers is avoided. This timing of this process can be extensive and misaligned with the pace of Fast Track consenting, potentially resulting in their being inadequately assessed or completely missed.

There are no reticulated water and wastewater networks available to service the development, nor capacity available. These networks must be put in place, and enabled by strategic infrastructure, which will take significant time to realise.

In the context of the duration of realisation of certain required infrastructure and unconfirmed status of likely significant cumulative impacts essential infrastructure, conventional planning processes may be more appropriate in this instance. No real acceleration of development at the site will be achieved through the Fast Track process while the strategic infrastructure issues remain unresolved or non-operational. Further the more extensive duration of normal planning processes will enable all matters and cumulative effects to be properly identified, mitigations put in place and incorporated into consents granted, ensuring externalities are avoided.

Summary

- HCC's comments identify strategic, infrastructure and integration matters that are relevant to the Minister's assessment of the referral application under section 22 of the Act, particularly given the proposal's scale, location, cross-boundary implications and cumulative effects.
- While a substantial suite of technical material has been provided, there remains uncertainty in relation to the proposal's strategic alignment with adopted growth frameworks, including the Future Proof Strategy and Waikato Regional Policy Statement, as well as the management of land-use compatibility at the rural-urban edge.
- Land-use compatibility, transport impacts on the Waikato Expressway and surrounding network, and three-waters servicing capacity remain key considerations, with further clarity required around long-term interface management, infrastructure staging, funding and delivery.
- These matters are not determinative at the referral stage but are relevant to whether the fast-track approvals process would appropriately facilitate the project in accordance with section 22, and if referred, to shape the scope, sequencing and safeguards required for any substantive application under section 22 of the Act.

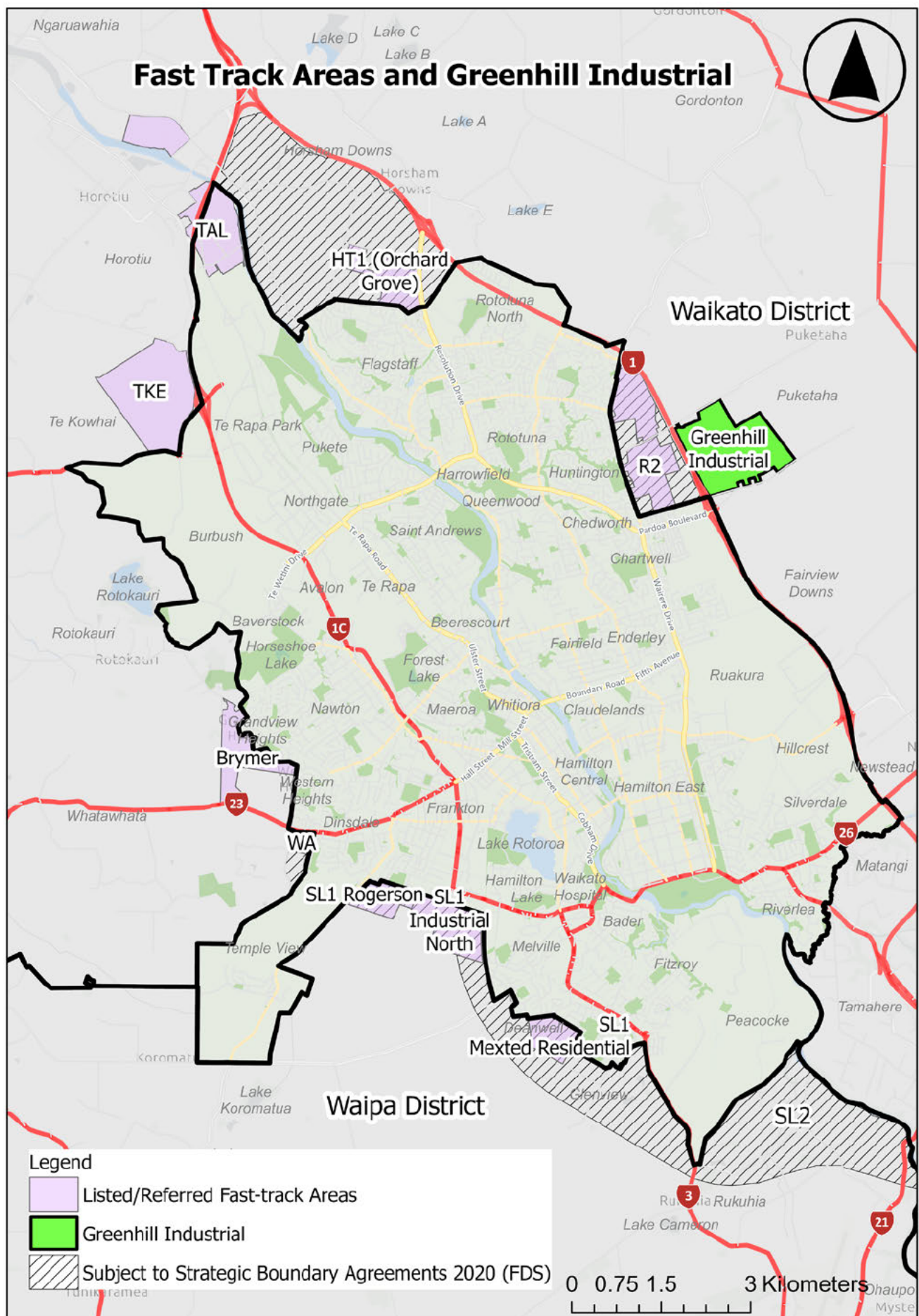
Thank you,



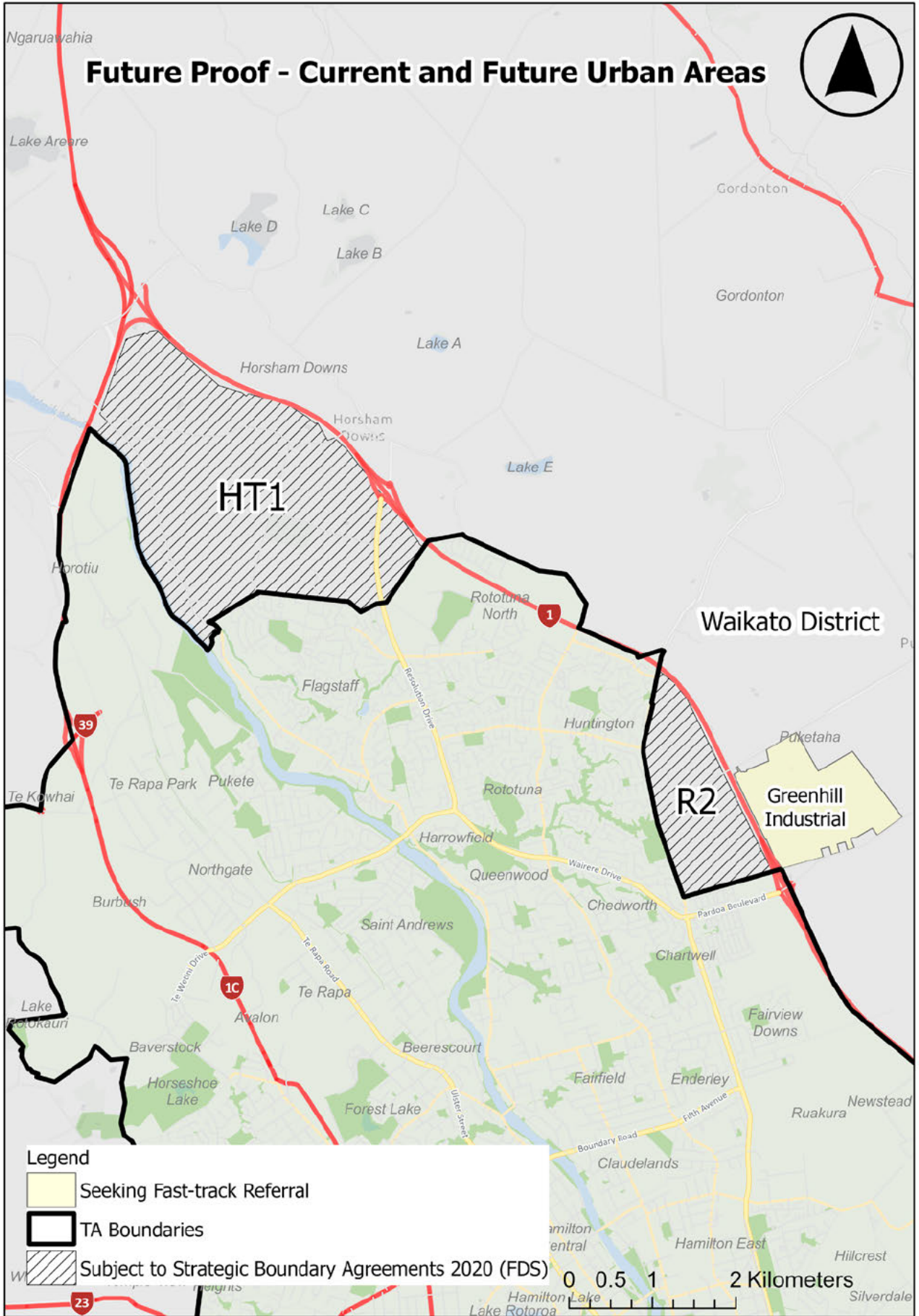
Dr Juliana Reu Junqueira

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

Appendix 1



Appendix 2





44 Bowen Street
Private Bag 6995
Wellington 6141
New Zealand
www.nzta.govt.nz

NZ Transport Agency Waka Kotahi Reference: 2026-0328
Fast-track Reference: FTAA -2602-1171

20 April 2026

Ministry for the Environment
PO Box 10362
Wellington 6143

Attention: Stephanie Frame

Via email: referral@fasttrack.govt.nz

Dear Stephanie,

Invitation for Written Comments on Application for Referral of the Greenhill Industrial Development (the Project) under the Fast-track Approvals Act 2024

Thank you for the opportunity to provide written comments on the request for referral of the Greenhill Industrial Development (**the Project**) under the Fast-track Approvals Act 2024 (**the Act**).

The NZ Transport Agency Waka Kotahi (**NZTA**) is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (**LTMA**) and the Government Rounding Powers Act 1989. The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

The Project is proposed to be located adjacent to State Highway 1 (SH1)/Waikato Expressway (WEX). SH1/WEX, is a critical section of State Highway 1 (SH1) and acts as the primary strategic transport corridor connecting Auckland to the economic hubs of the Waikato and Bay of Plenty.

Although direct vehicle access to and from SH1/WEX is not proposed, the primary access to the development is intended to be via Green Hill Road and the SH1 Greenhill Road Interchange. Consequently, the proposal would result in there being a considerable increase to the volume of traffic using the SH1 Greenhill Interchange. In addition to localised impacts, the increase in traffic generated by the development also has the potential to impact upon the wider SH1/WEX network due to the development's location and subsequent reliance on the network. At this stage, the extent of the potential traffic effects has not been assessed through detailed modelling.

NZTA therefore considers that a comprehensive assessment of transport effects would be required to determine whether, and to what extent, transport upgrades or other mitigation measures would be necessary to maintain the safe and efficient operation of the state highway network. NZTA has no planned funding to accommodate capacity increases on SH1/WEX and it is therefore expected that the Project should be designed and staged to avoid adverse effects on safety or network efficiency. Development of this scale and location should not result in a decline in level of service (LOS) that would adversely affect the safety or efficiency of the state highway network.



If the Minister does refer the Project under section 27 of the Fast Track Approvals Act 2024 (FTAA), NZTA requests that:

1. NZTA be invited to comment under section 53(2)(l) of the FTAA; and
2. The following information be included within any substantive application lodged:
 - An Integrated Transport Assessment (ITA) that includes at a minimum:
 - SIDRA intersection modelling for all relevant SH1/WEX interchanges and modelling of the network wide effects. The expectation from this work is that there should not be a decline in the LOS for SH1/WEX that results in traffic safety or efficiency being compromised.
 - An assessment on how the Project would align with the Waikato Expressway Network Plan (2014), R2 Growth Area, and the cumulative effects from other permitted and consented developments to the east of Hamilton city.
 - How public transport and other active modes (services) would be established and funded to address the traffic flows arising from the Project.
 - Clear identification of the stages and types of development that would be released only once specific transport infrastructure components (eg. WEX/SH1 improvements and local road components) are put in place. NZTA would expect that corresponding planning rules or consent conditions would be required as part of the substantive application to codify this staged approach. This approach would be necessary as NZTA is not proposing any additional funding to mitigate the effects of development of the scale/location being proposed by this Project.
 - Details of the proposed signage and lighting, including confirmation on what controls would be put in place (ie, conditions of consent) to ensure adverse safety effects on state highway users are appropriately managed/mitigated.
 - Sufficient detail and assessment confirming that the stormwater and drainage design would not adversely affect NZTA assets.

If you have any questions, please contact me.

Yours sincerely,

Nicola Foran
Team Leader Environmental Planning– Poutiaki Taiao / Environmental Planning
System Design, Transport Services

Email: environmentalplanning@nzta.govt.nz