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5 August 2026

Environmental Protection Authority
Private Bag 63002
Wellington 6140
NEW ZEALAND

Teenaa koe

HORSHAM DOWNS - FTAA-2606-1257 – REFERRAL APPLICATION

1. These comments are provided on behalf of Te Whakakitenga o Waikato Incorporated (Waikato-Tainui).

2. Te Whakakitenga o Waikato Incorporated is the governing body for the 33 hapuu and 68 marae of Waikato and manages the tribal assets for the benefit of over 100,000 registered tribal members. It is also:

    a) the trustee of the Waikato Raupatu Lands Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato Raupatu Lands Deed of Settlement 1995 and the Waikato Raupatu Claims Settlement Act 1995;

    b) the trustee of the Waikato Raupatu River Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato-Tainui River Deed of Settlement 2009 and the Waikato Raupatu Claims (Waikato River) Settlement Act 2010 (River Settlement);

    c) the mandated iwi organisation for Waikato-Tainui for the purposes of the Maaori Fisheries Act 2002; and

    d) the iwi aquaculture organisation for Waikato-Tainui for the purposes of the Maaori Commercial Aquaculture Claims Settlement Act 2004.

3. Waikato-Tainui welcomes the opportunity to provide comment on the Horsham Downs fast-track referral application.

WAIKATO-TAINUI COMMENTS

4. Waikato-Tainui notes that the Horsham Downs project is located on Gordonton Road within the Waikato District and is currently zoned for rural purposes. The site adjoins the Waikato Expressway, which also forms the boundary with Hamilton City Council in this location. The proposal is located outside the areas identified for urban growth

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under the current strategic planning framework, including the Future Proof Strategy, the Waikato Regional Policy Statement, and Waikato 2070. Waikato-Tainui also notes that transport planning for the Waikato Expressway has been undertaken on the basis of the existing rural land use pattern.

5. While the proposal may contribute to housing supply and generate short-term economic benefits during construction, the Future Proof NPS-UD Housing Development Capacity Assessment identifies no sub-regional shortfall in housing development capacity. The site has not been strategically identified for urban growth, and the infrastructure required to support development has not been planned or funded. This concern is reinforced by nearby Fast-track proposals, including Ruakura Growth Cell 2 and Orchard Grove, which together provide more than 30 years of housing supply. Waikato-Tainui questions whether the proposal, in the context of section 22(b)(i), is more appropriately facilitated through the Fast-track process than through the ordinary planning framework.

6. There is currently no wastewater network servicing the site, requiring careful consideration of how wastewater servicing would be achieved. While an existing water supply scheme serves the area, it was not designed to accommodate development of this scale and intensity and operates under restricted flow conditions, limiting available capacity, including for firefighting. Early engagement with Waikato Regional Council on surface water and groundwater matters will also be important to identify and manage issues relating to water allocation, groundwater effects, and discharge requirements.

7. The extent to which the NPS-HPL applies to the site, the proposal's consistency with the relevant policy framework, the significance of any loss of productive land, and the balance between housing, social and economic benefits and the long-term effects of converting productive rural land, will require consideration if advanced to the substantive phase. Any benefits arising from the proposal should be considered as part of the overall planning assessment, having regard to the full range of relevant environmental, cultural, social, economic, and strategic considerations.

8. The application references the relevant Treaty settlement legislation and associated statutory acknowledgements, and records engagement with relevant iwi and hapuu, including Ngaati Wairere and Ngaati Hauaa. Waikato-Tainui notes that the Applicant has also submitted a pre-engagement form through Waikato-Tainui's standard engagement process. Should the project advance to the substantive Fast-track phase, the Applicant should continue to engage with, and appropriately resource, mana whenua to participate in the process, including the preparation of any Cultural Values Assessments or other cultural assessments identified as necessary.

OVERALL POSITION

9. Waikato-Tainui does not take a final position on the proposal at referral stage. However, the matters identified above are considered to be of significance to Waikato-Tainui and will require further detailed assessment should the project be advanced to the substantive phase.

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10. In particular, further consideration would be required in relation to:

    - effects on freshwater systems;
    - loss of highly productive land and cumulative land use change;
    - cultural and archaeological values within the project area; and
    - alignment of the project with Tai Tumu, Tai Pari, Tai Ao (Waikato-Tainui Environmental Plan).

11. Waikato-Tainui reserves its position pending further information, including completion of cultural impact assessments, ongoing engagement with mana whenua, and appropriate resourcing by the Applicant to support continued involvement.

12. The referral application provides a sufficient high-level understanding of the proposal and its potential interface with Waikato-Tainui interests. However, significant matters remain to be addressed at the substantive stage to enable a full assessment of effects and mitigation outcomes.

13. The matters raised in these comments are not intended to be exhaustive. Given the preliminary nature of the referral stage and the information currently available, Waikato-Tainui may raise additional matters and provide further comments should the proposal progress beyond the referral stage and further information become available.

14. Waikato-Tainui looks forward to continued engagement as the proposal progresses through the fast-track approvals process.

Naaku i roto i ngaa mihi, naa

T Mapu

Te Maakariini Mapu
ENVIRONMENTAL PLANNER
WAIKATO-TAINUI