

Te Kowhai East Limited Partnership

Te Kowhai East Industrial Development

Substantive Application for Approvals

Volume A – Main Application

August 2026



Document control

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Acronyms and abbreviations

Acronym/Abbreviation	Term
Applicant	Te Kowhai East Limited Partnership
Approvals or Application	Resource Consents under the Resource Management Act 1991, Wildlife Approval under the Wildlife Act 1953, and Complex Freshwater Fisheries Approval under the Freshwater Fisheries Regulations 1983
ARI	Average Recurrence Interval
BBO	Bloxam Burnett & Olliver
BMHCP	Black Mudfish Habitat Creation Plan
BMP	Bat Management Plan
CIA	Cultural Impact Assessment
CMP	Construction Management Plan
DOC	Department of Conservation
DSI	Detailed Site Investigation
EcIA	Ecological Impact Assessment
EPA	Engineering Plan Approval
EWMP	Earthworks Management Plan
FMP	Fish Management Plan
FTAA	Fast-track Approvals Act 2024
FTAT	Fast Track Action Team
FTE	Full-time Equivalent
GIR	Geotechnical Completion Report
GDP	Gross Domestic Product
ha	Hectare
HAIL	Hazardous Activities and Industries List
HBA	Future Proof Housing and Business Capacity Assessment
HCC	Hamilton City Council
HCC ODP	Hamilton City Council Operative District Plan
IAWAI	IAWAI – Flowing Waters Ltd
ITA	Integrated Transportation Assessment
km	Kilometre
LMP	Lizard Management Plan
m	Metre
mm	Millimetre
m ³	Cubic metre
m ³ / day	Cubic metres per day
MACA	Marine and Coastal Area (Takutai Moana) Act 2011
MOU/Kawenata	Memorandum of Understanding/Kawenata
MSEP	Mangaheka Stream Enhancement Plan
MVA	Megavolt-ampere
NES-CS	National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NES-F	Resource Management (National Environmental Standards for Freshwater) Regulations 2020
NPS-UD	National Policy Statement on Urban Development 2020
NZTA	New Zealand Transport Agency Waka Kotahi
NZTA-7	Roading Designation for SH1C under the Waikato District Plan
NZTA-17	Roading Designation for SH39 under the Waikato District Plan
PDA	Private Development Agreement
PSI	Preliminary Site Investigation



RITS V2	Regional Infrastructure Technical Specifications Version 2
RL	Reduced Level
RMA	Resource Management Act 1991
SAR	Substantive Application Report
SH1C	State Highway 1C
SH39	State Highway 39
STMP	Stream Works Management Plan
TTF	Tuatahi First Fibre
TKE	Te Kowhai East
TKELP	Te Kowhai East Limited Partnership
TR20/06	Waikato stormwater runoff modelling guideline
TR20/07	Waikato stormwater management guideline
The Project	Te Kowhai East Industrial Development
The Site	270 Te Kowhai Road, 248 Onion Road, 28 Mathers Road, 246 Te Kowhai Road, Section 13 SO 416124 and Section 25-26 SO 417000
TWWG	Tangata Whenua Working Group
WDC	Waikato District Council
WDP-OiP	Waikato District Plan – Operative in Part
WRC	Waikato Regional Council
WRP	Waikato Regional Plan
WRTM	Waikato Regional Transport Model
vpd	Vehicles per day



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1. Application Overview

1.1 Overview

This Substantive Application Report (SAR) has been prepared on behalf of Te Kowhai East Limited Partnership (“TKELP” or “the Applicant”) to support its substantive application under the Fast-track Approvals Act 2024 (FTAA) for the approvals necessary to establish Te Kowhai East Industrial Development (the Project). The Project provides for an industrial development on the north-western edge of Hamilton.

The Project is a referred project under the FTAA. The referral application was accepted under section 21(1)(c) of the FTAA¹, enabling TKELP to lodge this substantive application for consideration by an expert Panel. The information provided in support of the referral application can be accessed on the Fast-track website². The Project addressed by this SAR is the Project authorised to proceed through the fast-track process.

In accordance with section 42(4)³ of the FTAA, TKELP is seeking the approvals required to authorise the Project, comprising resource consents under the Resource Management Act 1991 (RMA), a Wildlife Approval under the Wildlife Act 1953, and a Complex Freshwater Fisheries Approval under the Freshwater Fisheries Regulations 1983 (collectively referred to as the “Approvals” or the “Application”).

This SAR, together with its supporting technical reports, drawings, management plans, proposed conditions and other attachments, has been prepared to meet the relevant requirements for a substantive application under the FTAA, including sections 42, 43 and 44 and the applicable schedules to the FTAA. The information has been provided at a level of detail appropriate to the purpose for which it is required⁴.

Section 43(1)(c) of the FTAA requires an applicant to demonstrate that a project does not involve any ineligible activities other than those that may be subject to a determination under section 23 or 24. BBO has reviewed the relevant landholdings and confirms that the Project does not involve any ineligible activities as defined in section 5 of the FTAA. There is no identified Māori land within the Site, and TKELP does not seek a determination under section 23 or 24 of the FTAA.

1.2 Structure of this Application

The SAR has been separated into four volumes, consisting of the following:

- **Volume A – Main Application (this Report):** This volume is the overarching report for the Application. It contains information relevant to all approvals, including the Project background and strategic context, a description of the existing environment, a description of the Project, and a summary of the consultation undertaken for the Project.
- **Volume B – RMA Approvals:** Volume B supports the RMA approvals sought, including the resource consents, and contains the assessment of environmental effects, relevant statutory and policy framework, and proposed RMA conditions.
- **Volume C – Wildlife Act Approvals:** Volume C addresses the Wildlife Approval sought under the Wildlife Act 1953, including the relevant assessment and proposed conditions.

¹ See Volume A – Appendix H for a copy of the referral decision

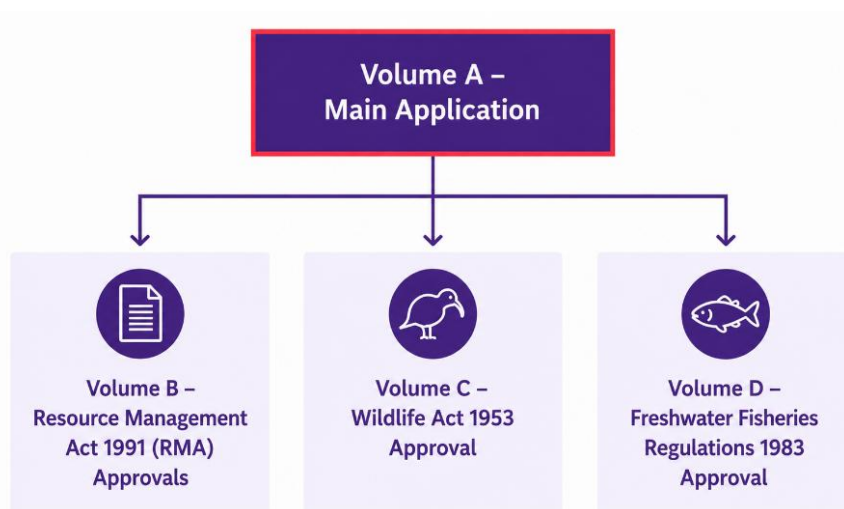
² <https://www.fasttrack.govt.nz/projects/te-kowhai-east/second-referral-application-accepted>

³ Section 42(4)(a), (h) and (j) FTAA

⁴ Section 44 FTAA



- **Volume D** – Freshwater Fisheries Approval: Volume D addresses the approval sought under the Freshwater Fisheries Regulations 1983, including the relevant assessment and approach to consent conditions.



The SAR is structured in this manner to avoid unnecessary duplication while ensuring that each approval pathway is clearly addressed and that the Panel can readily identify the information relevant to each approval sought.

As Volume A contains the overarching information for the Application, Volumes B to D must be read in conjunction with it.

1.3 The Applicant

Te Kowhai East Limited Partnership is the Applicant for the Project, and the person/entity authorised to lodge this substantive application under the FTAA.

TKELP is a joint partnership between Bluehaven Group and Kilroy Group, two New Zealand-owned property development businesses with extensive experience in the delivery of large-scale development projects. Both organisations have operated in the property sector for more than 30 years and collectively bring experience in residential, industrial, commercial and infrastructure development.

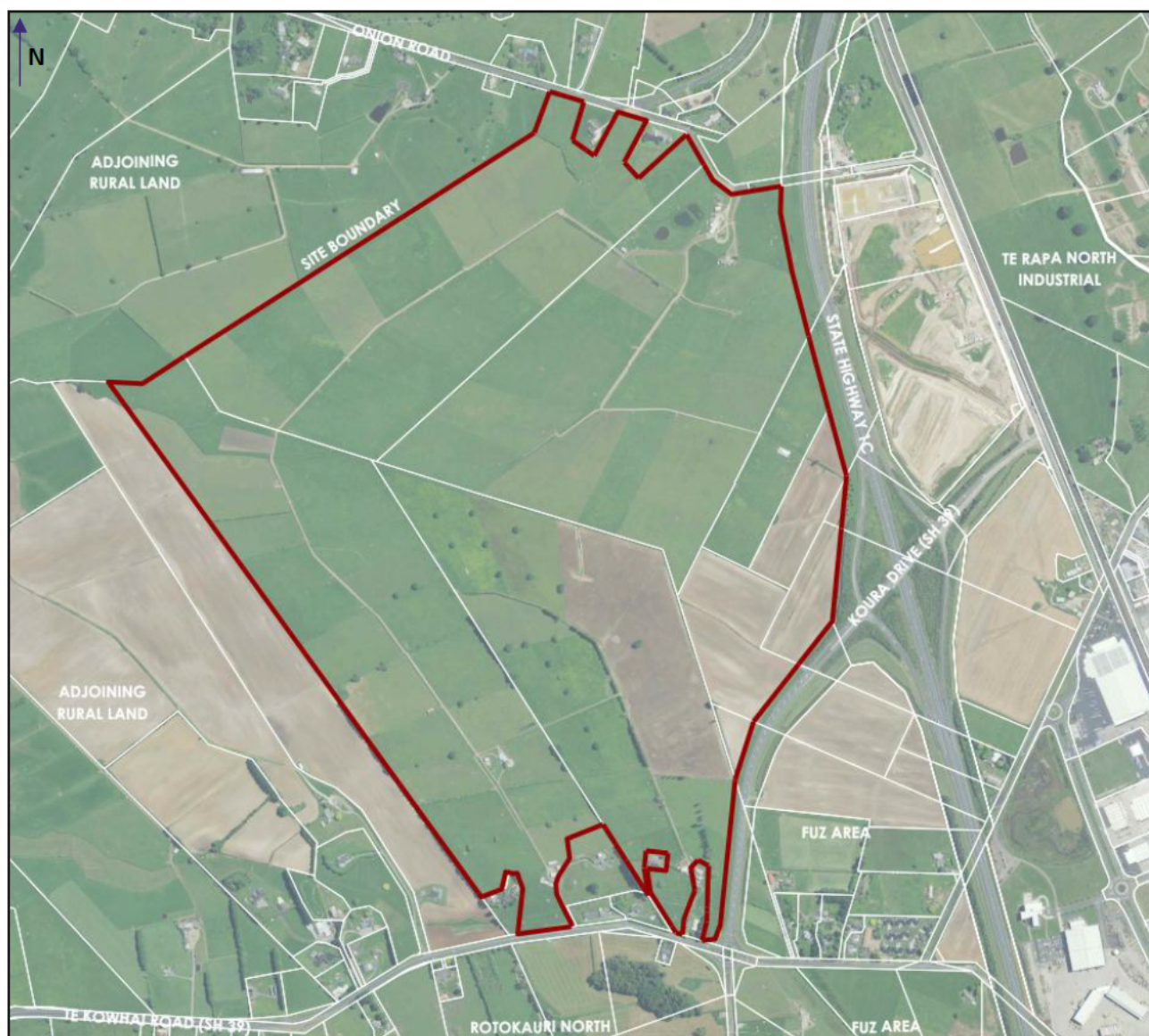
Bluehaven Group has played a significant role in the development of Pāpāmoa East in Tauranga, including the delivery of more than 2,300 homes together with supporting infrastructure, commercial centres and neighbourhood facilities. Kilroy Group has undertaken residential and industrial development in Hamilton and elsewhere in the upper North Island, including The Boulevard and Te Rapa Gateway in Hamilton and Lockerbie Estate in Morrinsville.

1.4 The Site

The Site comprises approximately 187.5 ha of land on the north-western fringe of Hamilton, within the Waikato District and immediately adjacent to the Hamilton City boundary. It is generally bounded by SH1C to the east, Te Kowhai Road (SH39) to the south, Onion Road to the north, and rural land to the west. The Site is commonly identified by the primary addresses of 270 Te Kowhai Road and 28 Mathers Road. The extent of the Site is shown on **Figure 1**.



Figure 1: Site Plan⁵



The Site is strategically located within the Auckland–Hamilton–Tauranga economic corridor and immediately adjacent to the Koura Drive / SH39 interchange and SH1C. This provides strong regional connectivity and places the Site close to established industrial and employment areas at Te Rapa and Horotiu.

The Site is currently predominantly in agricultural use and is generally flat, with a gradual rise toward its northern extent. Existing vegetation is limited largely to pasture, shelterbelts and scattered exotic vegetation, with only limited indigenous vegetation present. The Site is traversed by the Mangaheka Stream from the south-eastern corner to the north-western corner, a short section of the Te Otamanui Stream at the very southern end adjacent to Te Kowhai Road and various other highly modified farm drains. Existing built development is sparse and comprises farm-related buildings and associated rural infrastructure.

⁵ Adapt Studio Ltd, *Te Kowhai East Industrial Development Urban Design Statement (FINAL, 25 August 2026)*, Figure 3 – Illustrative Masterplan Concept.

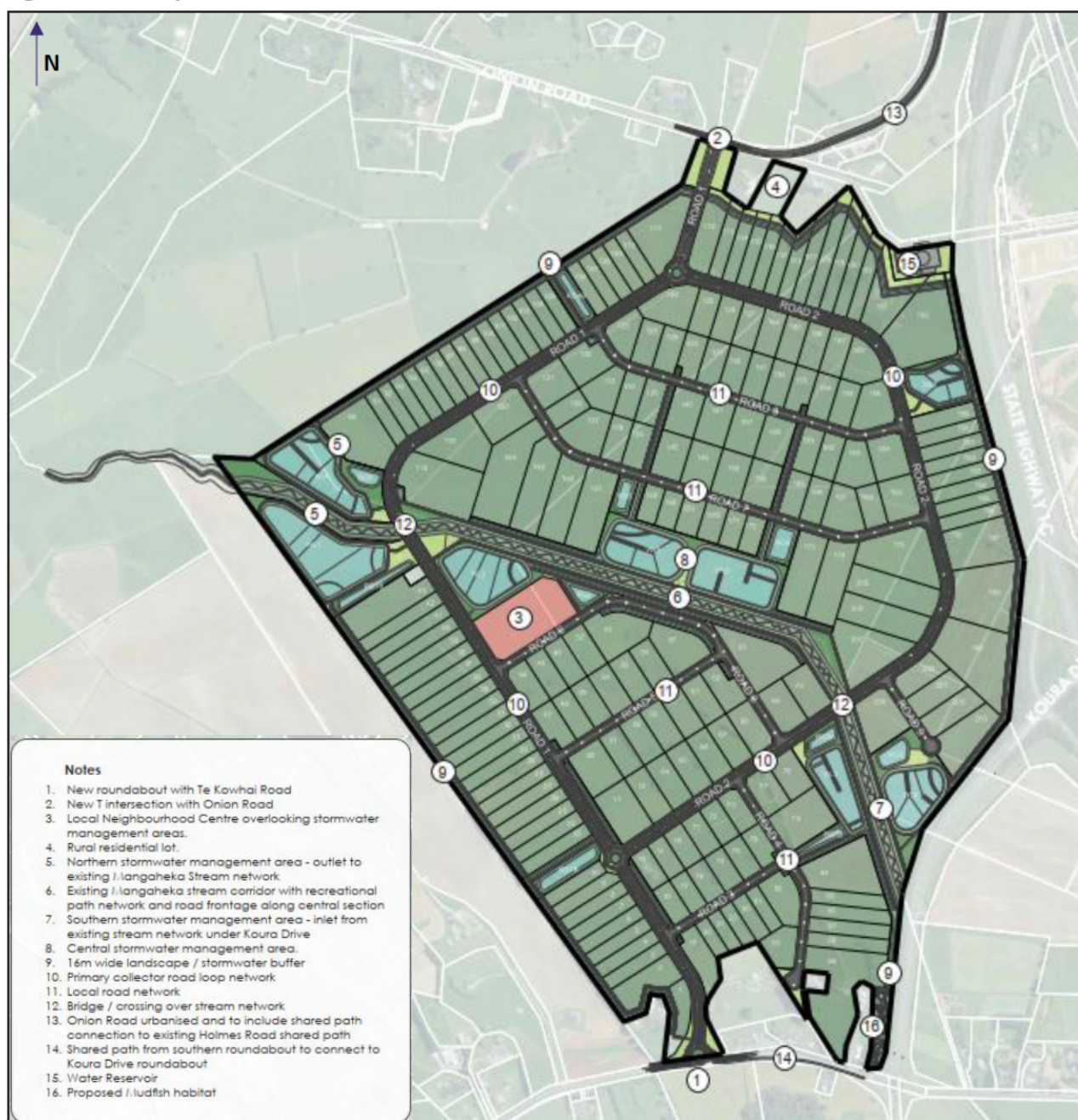


1.5 The Project

The Project provides for the comprehensive development of the Site as an integrated industrial precinct. It includes approximately 210 industrial lots, a 2 ha Neighbourhood Centre, reserves for recreation, stormwater management and ecological mitigation, together with the internal roading network, connections to the surrounding transport network and the infrastructure required to service the development.

The Project has been masterplanned (see Figure 2) to provide a coordinated framework for land use, subdivision, transport, three waters infrastructure, open space and ecological outcomes across the Site. Development will occur in stages, with the Masterplan providing the overarching framework for the ultimate form and integration of the industrial precinct.

Figure 2: Masterplan⁶



⁶ Adapt Studio Ltd, *Te Kowhai East Industrial Development Urban Design Statement (FINAL, 25 August 2026)*, Figure 6 – Illustrative Masterplan Concept.



1.6 Need for the Project

The Project responds to an identified need for additional industrial land to support the continued growth of Hamilton and the wider Hamilton–Waikato metropolitan area. That need is demonstrated through the Future Proof Housing and Business Capacity Assessment (HBA), Hamilton City Council’s (HCC’s) ongoing work on industrial land supply and demand, Waikato District Council’s (WDC’s) strategic growth planning, and the Economic Assessment prepared for the Project (see **Vol B – Appendix H**).

Hamilton City, Waikato District and Wāipā District form the Hamilton Tier 1 urban environment under the National Policy Statement on Urban Development 2020 (NPS-UD). The NPS-UD requires planning decisions within that urban environment to contribute to well-functioning urban environments and requires sufficient development capacity to be provided for business land over the short, medium and long term. Industrial land demand and supply is therefore appropriately considered across the wider metropolitan area, rather than solely by reference to territorial authority boundaries.

Hamilton is experiencing sustained population and economic growth. HCC’s Urban Growth Strategy anticipates Hamilton’s population increasing from approximately 180,000 to around 310,000 people over the next 50 years⁷. The Economic Assessment prepared for the Project similarly projects Hamilton’s population to reach approximately 286,500 by 2055. This growth will increase demand for employment and industrial land. The Economic Assessment identifies industrial land demand of approximately 17-25 ha per annum, or 170-250 ha per decade, a range that is broadly consistent with both the HBA and more recent industrial demand modelling commissioned by HCC.

The recent HCC work provides further evidence of the pressures on Hamilton’s industrial land market. HCC’s Industrial Land Projections report, June 2025⁸ assessed a range of future demand scenarios and identified materially greater industrial land requirements where dynamic growth factors are taken into account. HCC subsequently noted that there remains uncertainty over the precise scale and timing of the shortfall, but that there is general recognition that industrial land supply is highly concentrated and that greater choice and competition are required. HCC has also recognised the long lead times associated with identifying, planning and servicing new industrial land and the need to plan ahead to maintain adequate supply.

While Hamilton currently contains approximately 452 ha of vacant industrial land, the Economic Assessment identifies that this supply is concentrated in a small number of locations, principally Ruakura and Te Rapa. At the assessed rate of demand, this represents approximately 18–26 years of remaining supply, but does not provide a robust long-term supply position, with a shortfall projected over the longer term. There is also a spatial imbalance in the distribution of industrial land supply, with a substantial proportion of vacant industrial capacity located at Ruakura in Hamilton’s south-east, while industrial land availability in the north and north-west of the City remains comparatively constrained.

This issue is also reflected in HCC’s strategic planning. HCC has identified Te Kowhai East as an emerging growth area with the potential to contribute additional industrial land supply. In June 2025, HCC specifically referred to Te Kowhai East alongside other emerging industrial areas as part of the response to the City’s future industrial land requirements⁹. Although the Site lies within Waikato District, its location immediately adjoining Hamilton City and the established Te Rapa industrial area means its development is closely connected to the wider Hamilton urban environment.

⁷ <https://hamilton.govt.nz/strategies-plans-and-projects/strategies/hamilton-urban-growth-strategy/>

⁸ <https://hamilton.govt.nz/assets/Uploads/Documents/Content-Documents/Your-City/Formative-report-on-Hamilton-Industrial-Land-Projections.pdf>

⁹ <https://hamilton.govt.nz/assets/Uploads/Documents/Agendas-and-minutes/Agendas/Strategic-Growth-and-District-Plan-Committee-OpenAgenda-10-June-2025>



The wider strategic direction within Waikato District is complementary. Waikato 2070 – Growth and Economic Development Strategy identifies Horotiu as an employment growth area and anticipates continued employment and industrial growth north of Hamilton. WDC’s submission on the Te Rapa North industrial plan change¹⁰, similarly recognised that industrial growth at Te Rapa North would complement, rather than undermine, the sub-regional industrial growth anticipated at Horotiu.

Against this context, the Site is particularly well placed to respond to the identified need. Although located within Waikato District, it forms part of the wider Hamilton Tier 1 urban environment and lies immediately adjacent to Hamilton’s established Te Rapa industrial area, between the Te Rapa and Horotiu employment areas. It is also strategically located adjacent to SH39, SH1C (which is part of the Waikato Expressway) and close to substantial planned residential growth at Rotokauri. The Project would therefore extend and consolidate an existing and emerging cross-boundary employment corridor rather than establish an isolated industrial node.

The approximate 187.5 ha Site will provide approximately 123 ha of net developable industrial land, together with a 2 ha neighbourhood centre. The Economic Assessment considers this to represent approximately 7–11 years of Hamilton’s future industrial land demand. The Project will therefore make a material contribution to future industrial land supply, particularly in the north-west of the metropolitan area, while improving the location, diversity and responsiveness of industrial land available to the market.

1.7 Benefits of the Project

The Project will deliver a range of significant economic, strategic, transport, environmental and cultural benefits. These benefits build on those identified through the referral process and are supported by the technical assessments prepared for the substantive application.

The key benefits of the Project are:

1. **Additional industrial land supply.** The Project will provide approximately 123 ha of net developable industrial land and make a material contribution to addressing the identified long-term shortfall in industrial land within the Hamilton–Waikato metropolitan area. The Project represents approximately 7–11 years of future industrial land demand and will materially improve the distribution of industrial land supply in north-west Hamilton, where existing capacity is more constrained.
2. **Significant economic and employment benefits.** The Project represents an approximately \$1.9 billion development. The Economic Assessment estimates that construction will contribute approximately \$580.9 million to GDP and support 4,800 FTE jobs. Once operational, the Project is estimated to contribute approximately \$557.0 million to GDP per annum and support approximately 3,740 FTE jobs. Relative to the existing dairy farming use of the Site, this represents a net increase of approximately \$556.0 million in GDP and 3,734 FTE jobs per annum.
3. **A well-functioning and more balanced urban environment.** The Project will locate a substantial employment area close to established and planned residential growth in north-west Hamilton, including Rotokauri and Te Kowhai, increasing opportunities for people to live closer to employment and reducing the spatial mismatch between population growth and employment land supply. The Economic Assessment identifies this proximity as improving the relationship between places of employment and future residential growth and supporting a more balanced distribution of industrial land relative to Hamilton’s growth pattern. The Project also consolidates industrial development alongside the existing Te Rapa and Horotiu employment areas rather than creating a dispersed industrial node.

¹⁰ <https://hamilton.govt.nz/assets/Uploads/Documents/Content-Documents/Property-Rates-and-Building/PC-17-Te-Rapa-North-Industrial-Private-Plan-Change/Submissions/PPC17-Submission-010-Waikato-District-Council.pdf>



4. **Efficient use of a strategically located site.** The Site is located adjacent to SH39 and SH1C and forms a logical extension of the established Te Rapa industrial area within the Auckland–Hamilton–Tauranga economic corridor. The Economic Assessment identifies opportunities for co-location and agglomeration benefits associated with expanding the north-western industrial area, together with efficient access to key freight routes and markets.
5. **Increased competition and choice in the industrial land market.** The Project will introduce a substantial new source of industrial land into a market where remaining vacant supply is concentrated in a relatively small number of locations and ownerships. The Economic Assessment identifies this concentration as limiting the responsiveness and competitiveness of industrial land supply. TKE will provide a range of lot sizes and tenure options capable of responding to different industrial occupiers and business requirements, improving market choice and competition.
6. **Improved transport connectivity, resilience and transport choice.** The Project will establish a connected internal road hierarchy with separate external connections to both SH39 and Onion Road. The ITA identifies that these multiple access points will provide greater route choice and reduce reliance on any single connection to the wider transport network, supporting network resilience as the wider metropolitan area grows. The Project will also deliver new walking and cycling infrastructure, including connections to the existing shared path network, and will provide for future public transport integration.
7. **Improved freshwater and stormwater outcomes.** Development of the Site provides an opportunity to substantially improve the existing highly modified rural drainage environment. The Mangaheka Stream currently functions as a modified agricultural drainage system and has constrained conveyance capacity. The Project will reconstruct and enhance the stream corridor, including a meandering baseflow channel, permanent pools, riparian enhancement and integration with the wider stormwater and open space network. The works will also improve flood conveyance and reduce erosion risk while providing ecological enhancement within the Mangaheka Stream corridor.
8. **Ecological enhancement and habitat creation.** The Project will replace extensive areas of intensively managed farmland and artificial farm drains with an integrated network of streams, wetlands, stormwater areas, riparian planting and open space. The masterplan specifically provides for enhancement of the Mangaheka Stream, new mudfish habitat and an open-space network with a predominant stormwater and ecological enhancement function. The ecological restoration package includes approximately 84,430 m² of riparian planting and enhancement along the Mangaheka Stream and approximately 3,600 m² of purpose-built black mudfish habitat. The Ecological Impact Assessment (EcIA)¹¹ concludes that these measures, together with the creation of additional stream length and enhancement of the Mangaheka Stream, will improve freshwater habitat quality and ecological connectivity and deliver net-gain outcomes for a number of ecological values.
9. **Integration of mana whenua values.** Mana whenua values have informed the development of the Project and will continue to be incorporated through detailed design and implementation. The masterplan provides opportunities for mana whenua expression within the Mangaheka Stream and open-space network, including at the proposed pedestrian bridge and through landscape and cultural design. The Project also provides for ongoing engagement in relation to ecological restoration, taonga species, cultural protocols and the implementation of cultural values as the development progresses.

Overall, the Project will not only respond to the identified need for additional industrial land, but will provide substantial employment and economic activity, strengthen the north-western employment corridor, improve transport connectivity and resilience, and deliver environmental and cultural outcomes as part of the transformation of the Site.

¹¹ Vol B. Appendix M



1.8 Summary of approvals sought under the FTAA

Set out below are the approvals sought under the FTAA. The Application seeks all approvals presently identified as necessary to authorise the Project. No other resource consents, notices of requirement for designations, or alterations to existing designations are presently identified as being required for the Project beyond those described in this Application.

1.8.1 Resource Consents

Section 42(4)(a) of the FTAA provides that approvals may be sought for resource consents that would otherwise be applied for under the RMA. Various resource consents are required for the Project. Volume B of this SAR describes each resource consent in more detail and includes the information assessment required by clauses 5 to 9, and 17 of Schedule 5 and section 43(3)(a) of the FTAA.

In summary, TKELP seeks the following resource consents:

- Land use consent under the Waikato District Plan – Operative in Part (WDP-OiP) as a Non-complying Activity for the proposed industrial development and associated activities across the Site, including industrial activities, Neighbourhood Centre activities and other compatible supporting land uses provided for through the Development Framework;
- Subdivision consent under the WDP-OiP as a Prohibited Activity¹² for the staged subdivision of the Site. The prohibited activity status arises under Rules SUB-R40 and SUB-R41 because the subdivision will create additional allotments on high class soils and located within the General Rural Zone;
- Resource consent as a Controlled Activity under regulation 9 of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS)¹³; and
- Resource consents under the Waikato Regional Plan (WRP), with an overall Discretionary Activity status for:
 - Temporary groundwater and surface water takes associated with construction dewatering;
 - Drilling of groundwater dewatering wells/bores;
 - Operational stormwater discharges to surface water;
 - Temporary damming and diversion of the Mangaheka Stream, Te Otamanui Stream, and diversion of flows within the existing artificial drainage network on the site during construction, alongside permanent groundwater diversion as a result of interception by the constructed stormwater wetlands, vegetated swales and deepened Mangaheka Stream;
 - Structures and works within river beds, including installation of bridges, culverts, stormwater outfall structures and erosion-control structures, alongside the associated bed disturbance;
 - Soil disturbance, roading, tracking and vegetation clearance, including works within high-risk erosion areas, and cleanfill placement, including placement within high-risk locations; and
 - Activities within the WRC-managed Mangaheka Stream / McBeth Drain corridor requiring maintenance access.
- Resource consent as a Discretionary Activity under regulation 57 of the National Environmental Standards for Freshwater 2020 (NES-F) for the permanent reclamation of approximately 212 m of a watercourse.

A standard lapse period is sought for the land use consents and the regional consents, which are not subject to a fixed consent duration. The proposed durations for the regional consents vary according to the nature of the activity, with 20-year durations sought for construction-related approvals and 35-year durations for

¹² Section 42(5)(a) enables an approval for an activity that is a prohibited activity under the RMA.

¹³ Section 42(4)(a).



permanent stormwater, stream and groundwater diversion activities. Extended lapse periods¹⁴ are sought for the subdivision consent to reflect the scale of the Project and its staged implementation over time.

1.8.2 Wildlife Approval

A wildlife approval is sought under section 42(4)(h) and Schedule 7 of the FTAA to authorise activities that would otherwise require authorisation under the Wildlife Act 1953. TKELP seeks a 10-year period for the Wildlife Approval.

The approval is required principally to authorise the handling, capture, salvage, transfer and relocation of indigenous lizards, together with any incidental injury or mortality associated with those authorised activities. The draft LMP is included in **Volume C – Appendix A** and sets out the framework for managing effects on indigenous lizards and implementing the authorised salvage and relocation activities.

An assessment of the relevant ecological effects and the proposed approach to wildlife management is provided in **Volume C** of this SAR.

1.8.3 Complex Freshwater Fisheries Approval

A dispensation for complex freshwater fisheries activities is sought under section 42(4)(j) and Schedule 9 of the FTAA from requirements that would otherwise apply under the Freshwater Fisheries Regulations 1983.

The dispensation is sought in relation to the temporary dams, diversions and associated structures required to enable construction works within the Mangaheka Stream and Te Otamanui Stream. This includes the temporary damming, diversion and dewatering required to facilitate the staged modification of the Mangaheka Stream and associated instream works, and the temporary damming, diversion and dewatering of the Te Otamanui Stream required to install the proposed culvert associated with the new collector road connection.

An assessment of the activities for which the dispensation is sought, their effects and the proposed management measures is provided in **Volume D** of this SAR.

1.9 Consistency with the purpose of the FTAA

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

The Project is considered directly consistent with that purpose. As set out in Sections 1.6 and 1.7 above, it will deliver approximately 123 ha of net developable industrial land within the Hamilton–Waikato metropolitan area in response to an identified long-term requirement for additional industrial development capacity. The Site is strategically located adjoining the established Te Rapa industrial area and the SH1C/SH39 strategic transport network, and will extend and consolidate an existing employment corridor rather than establish an isolated industrial node.

The Project will also generate significant regional economic and employment benefits, with an estimated development value of approximately \$1.9 billion, approximately \$580.9 million in construction GDP and 4,800 construction FTE jobs, and approximately \$557.0 million in annual GDP and 3,740 FTE jobs once operational.

¹⁴ For s223 approval under the RMA



Those economic and development benefits are supported by substantial investment in transport and three-waters infrastructure, improved walking and cycling connectivity, restoration and enhancement of the Mangaheka Stream corridor, new freshwater habitat and wider ecological enhancement. The Project therefore provides significant regional development, infrastructure, economic, employment and environmental benefits.

Accordingly, the Project is considered consistent with the purpose of the FTAA.



2. EXISTING ENVIRONMENT

2.1 The Site

The Site comprises a large, contiguous landholding of approximately 187.5 ha on the north-western edge of Hamilton, as shown in Figure 1. It is located within Waikato District, immediately adjacent to the Hamilton City boundary, and is generally bounded by SH1C to the east, Te Kowhai Road (SH39) to the south, Onion Road to the north, and rural land to the west. The Site is commonly identified by the primary addresses of 270 Te Kowhai Road and 28 Mathers Road, together with other associated landholdings forming part of the Site.

The Site comprises six Records of Title held by TKE and Empire Corporation Limited. TKE owns the majority of the Site¹⁵ with Empire Corporation Ltd owning the balance.

The relevant Records of Title, legal descriptions, ownership details and registered interests are summarised in Table 2.1 below. Copies of the relevant titles are contained in Volume A – Appendix B.

Table No. 2.1

Record of Title Details				
Physical Address	Legal Description	RoT	Owner	Registered Interests
270 Te Kowhai Road, Hamilton	Lot 2 DP 523063	831324	Te Kowhai East LP	• S644432: Subject to drainage rights and fencing. • Right to transmit electricity specified in easement 5103899.9. • WEL Easement 9822881.1. • Right of Way Easement 11184513.2. • WEL Easement 11184513.4
248 Onion Road, Horotiu	Lot 3 DP 523063	831325	Te Kowhai East LP	• Subject to a drainage right.
28 Mathers Road, Horotiu	Part Allotment 6 Pukete Parish and Part Allotment 215 Parish of Pukete and Section 1 Survey Office Plan 473918	SA770/125	Te Kowhai East LP	• Subject to drainage and fencing rights. • 9216410.1: Gazette Notice to acquire section 3 SO 417000 for road, to vest in Her Majesty the Queen and acquire section 2 SO 41700 for the functioning indirectly of a road. • 9216419.2: Gazette Notice. Section 28 SO 417000 and Section 29 SO 417000 to be taken for severance. • 9216419.3: Gazette Notice declares Section 4 SO

¹⁵ Including the land formerly held by Thelma Jean Murray, which was transferred into TKELP's ownership in January 2026



				417000 to be taken for severance. - Public Works Act 1981 Section 1 SO 473918 is included in this CFR (10006618.3). - Subject to Section 11 Crown Minerals Act 1991 (Section 1 SO 473918). - Subject to Part IVA Conservation Act 1987 (Section 1 SO 473918).
246 Te Kowhai Road	Lot 1 DP 546273	929707	Te Kowhai East LP	- Subject to drainage created by S644432. - Appurtenant hereto is a drainage right created by S644432. - Electricity transmit easement 5103899.9.
No physical address	Section 13 SO 416124. Section 2 SO 577981	1109516	Empire Corporation Limited	- Subject to section 11 Crown Minerals Act (section 13 SO 416124). - Subject to Part IVA of the Conservation Act (Section 13 SO 416124). - Subject to the provisions regarding drainage and fencing over Section 13 SO 416124.
No physical address	Section 25-26 SO 417000. Section 2 SO 473918	1109519	Empire Corporation Limited	- Subject to Section 11 Crown Minerals Act (Section 2 SO 473918). - Subject to Part IVA Conservation Act (Section 2 SO 473918).
196 Onion Road, Horotiu	Lot 6 DP 397443	388876	[REDACTED]	- Fencing provision in conveyance 288247 - Land covenant in conveyance 288247 - Subject to drainage right created by conveyance 288247 - Subject to natural gas pipeline easement
302A Te Kowhai Road, Te Kowhai	Lot 3 DP 422212	485829	[REDACTED]	- Subject to drainage and fencing rights. - Consent Notice pursuant to s221 of the RMA (8344401.2). - Right of way easement instrument 8344401.8 (subject to s243(a) RMA.



360/360A/ 360B Te Kowhai Road, Te Kowhai	Lot 3 DP 359100	240791	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	• Subject to drainage and fencing rights. • Compensation Certificate by Waipa County Council. • Right to drain water in favour of Waipa County Council. • Two natural gas pipeline easements. • Compensation Certificate pursuant to the Public Works Act 1981 in favour of Waikato District Council. • Compensation Certificate pursuant to the Public Works Act 1981 in favour of His Majesty the King. • Right to drain water in favour of New Zealand Transport Agency.
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The registered interests are primarily associated with existing drainage and fencing rights, electricity infrastructure, rights of way, and historical Public Works Act and Crown interests.

As identified in Table 2.1, Section 13 SO 416124, Section 2 SO 473918 and Section 1 SO 473918 are noted as being subject to Part 4A of the Conservation Act 1987. Part 4A provides for marginal strips to be reserved when qualifying Crown land is disposed of.

Sections 1 and 2 SO 473918 do not adjoin or contain a river or stream and, accordingly, the marginal strip provisions were not triggered in relation to those parcels. Section 13 SO 416124 adjoins the Mangaheka Stream and is subject to the marginal strip provisions associated with that watercourse. DOC has confirmed that the relevant Part 4A assessment arose when the land was disposed of in 2012. The Project retains the marginal strip alongside the Mangaheka Stream and integrates it within the wider stream corridor, which will accommodate the reconstructed and enhanced stream, riparian planting, ecological restoration and pedestrian connections. The marginal strip will remain in place as subdivision occurs and will continue to be identified on any new Records of Title created through the subdivision process.

Also identified in Table 2.1 is Gazette Notice 9216410.1 on Part Allotment 6 Pukete Parish and Part Allotment 215 Parish of Pukete and Section 1 Survey Office Plan 473918. The notice records the historic acquisition of land from the property by the Crown for the State Highway corridor, including a small segregation strip associated with the functioning of the road. The Gazette Notice therefore reflects a historic land acquisition rather than an encumbrance requiring the Applicant to undertake any particular action as part of the Project.



Figure 3: Parcels subject to Part 4A of the Conservation Act 1987



2.2 Existing features and built form

Physically, the Site is predominantly low-lying and generally flat. Most of the land sits at approximately RL27–29 m, before rising toward the northern boundary where the terrain transitions into rolling hill country reaching approximately RL40 m within the Site. This northern landform is the principal topographic feature of the Site; otherwise, the land consists largely of broad, open agricultural plains.

The Site is currently used predominantly for dairy farming and associated rural activities. It comprises a series of pasture paddocks separated by farm drains, fences and shelterbelts, together with a network of farm



tracks providing access across the property. Historic and current land uses also include cropping and associated farm infrastructure.

Existing built development is limited and dispersed. Existing structures are principally associated with the farming operation and include farm dwellings, a milking shed, ancillary farm buildings and other rural infrastructure. The northern part of the Site contains the principal farm residence and milking facilities, while smaller utility and farm buildings occur elsewhere across the Site.

Vegetation across the Site is limited. The majority of the land is improved pasture or cropping land, with vegetation largely comprising exotic shelterbelts, hedgerows, paddock trees and other scattered exotic vegetation. There are no substantial areas of remnant indigenous forest within the Site.

The Site is crossed by an extensive network of modified waterways and artificial farm drains. The principal natural watercourse is the Mangaheka Stream, which traverses the Site before flowing west toward the Waipā River. The Site also contains the Te Otamanui Stream near its southern extent and approximately 16.2 km of artificial farm drains. The Mangaheka Stream and associated drain network have been substantially modified by historic agricultural drainage and currently perform both drainage and flood-conveyance functions across the Site. **Figure 4** below demonstrates the existing streams and drains on the site.

Figure 4: Watercourse Classification (existing)¹⁶



The Site is also low-lying in places and is affected by existing floodplain and overland flow paths associated principally with the Mangaheka Stream and the wider farm drainage network, being tributaries of the Mangaheka Stream. Shallow groundwater is also present across parts of the Site, as described in Section 2.6 below.

¹⁶ Ecological Solutions, *Te Kowhai East – Industrial Development: Ecological Impact Assessment (EcIA)*, (31 August 2026) Figure 28, p. 34



Overall, the existing Site is characterised by a large-scale, predominantly open pastoral landscape with limited built development and vegetation, modified waterways and drainage features, and a generally flat landform rising toward the north.

2.3 Surrounding locality

The Site is located approximately 8 km southeast of Hākarimata / Taupiri Maunga, approximately 1.6 km west of the Waikato River and 5.2 km south-east of the Waipā River. Surrounding land uses are mixed, comprising established industrial, commercial, residential and rural activities. The Site also adjoins the Rotokauri and Rotokauri North Structure Plan areas which identify planned future urban growth in the direct vicinity of the site. The wider locality therefore has a transitional character, with established and planned urban and industrial development to the east, south and north, and predominantly rural land to the west and north-west.

To the east and south-east, across SH1C, is the established Te Rapa industrial area. Immediately north of Te Rapa is Te Rapa North, which is identified for further industrial development. To the north is the existing Horotiu Industrial Park, an established industrial and employment area within Waikato District.

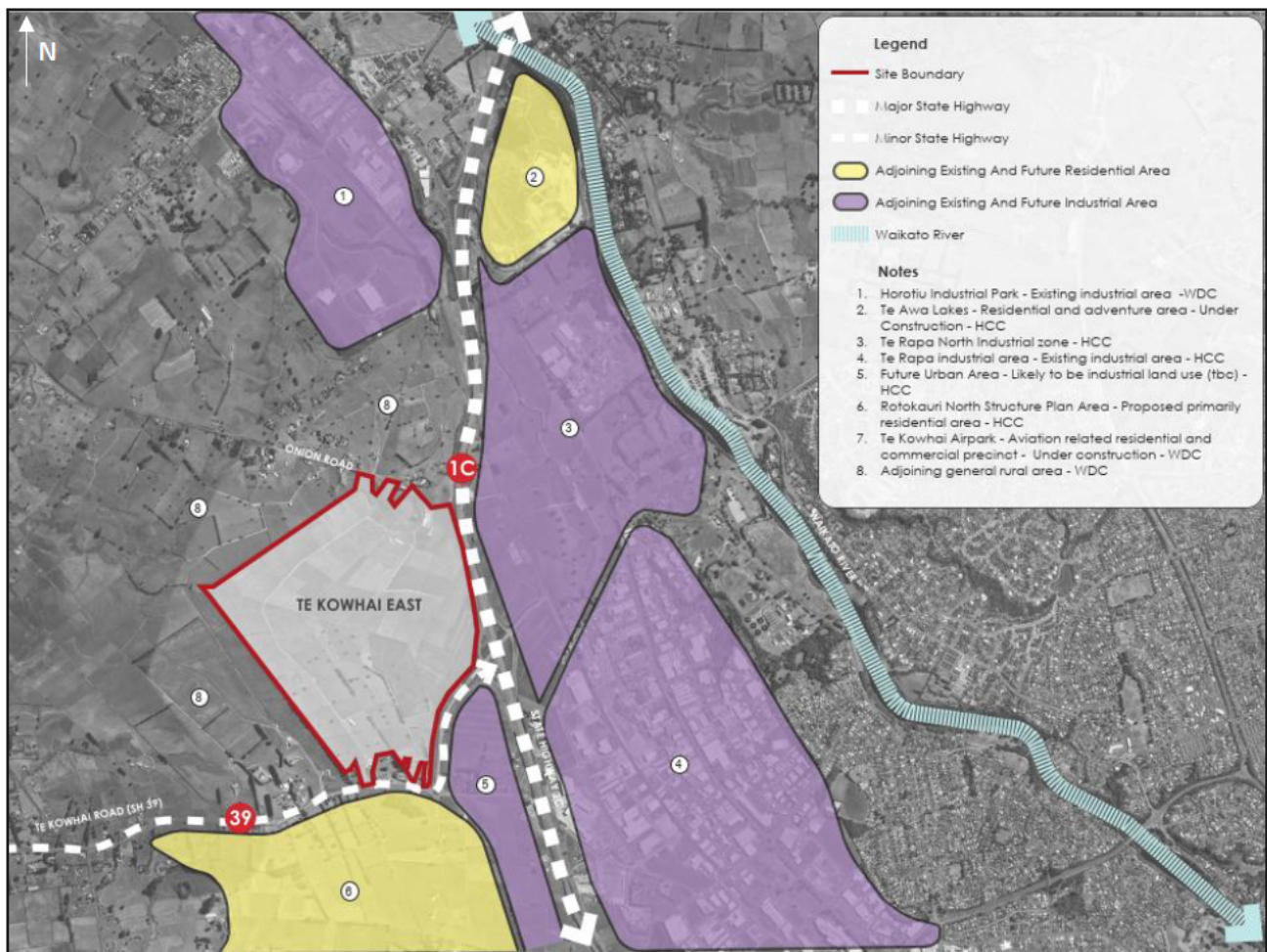
Immediately south of the Site, across SH39, is the Rotokauri North Structure Plan area, which is planned predominantly for residential development. Further to the north-east is Te Awa Lakes, a residential and recreation development currently under construction.

To the north and west of the Site, land uses are predominantly rural, comprising pastoral and cropping land, together with a number of rural-residential and lifestyle properties, particularly along Onion Road and Mathers Road. Shelterbelts, scattered groups of trees and other vegetation are present throughout the surrounding rural landscape.

Figure 5 below illustrates the relationship of the Site to the surrounding established and planned land uses.



Figure 5: Surrounding Locality¹⁷



2.4 Planning context

The Site is located within Waikato District and directly adjoins the Hamilton City boundary. The territorial authority boundary generally follows Te Kowhai Road and Koura Drive along the southern and eastern edges of the Site. Accordingly, the district planning framework applying to the Site is administered by Waikato District Council (WDC), while land immediately to the south and east is within Hamilton City.

The Site is wholly within the Waikato Region and is subject to the regional planning framework administered by Waikato Regional Council (WRC).

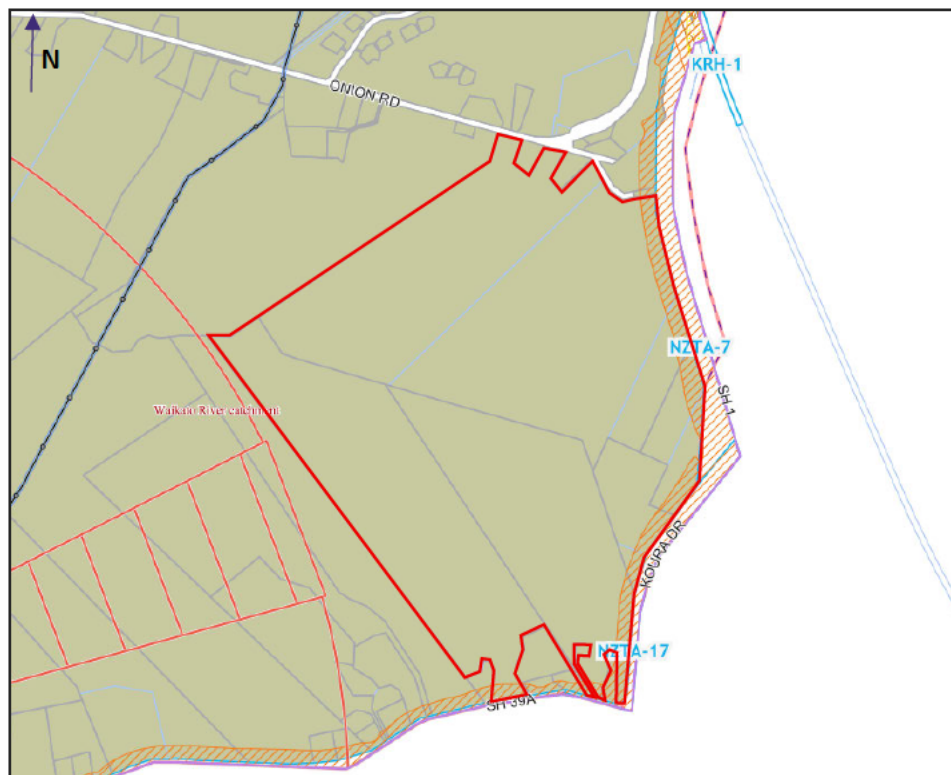
2.4.1 Zoning and planning notations

The Site is zoned General Rural Zone under the WDP-OiP as shown in green shading in Figure 6.

¹⁷ Adapt Studio Ltd, *Te Kowhai East Industrial Development Urban Design Statement* (FINAL, 25 August 2026), Figure 2 – Illustrative Masterplan Concept.



Figure 6: Site Zoning and overlays



The Site is also subject to, or adjoins, a number of planning notations and overlays. These include:

- Designation NZTA-7 (SH1C) and NZTA-17 (SH39) protecting the State highway network adjoining the Site;
- The State Highway Noise Control Boundary along parts of the eastern and southern boundaries adjoining SH1C and SH39; and
- Its location within the Waikato River catchment.

Designation NZTA-7 and NZTA-17 provide for the operation, maintenance, use and improvement of the State highway network. The State Highway Noise Control Boundary identifies land adjoining State highways that may experience elevated road traffic noise and is relevant to the establishment of noise-sensitive activities to avoid reverse sensitivity effects.

The regional planning framework applying to the Site includes the Waikato Regional Policy Statement and Waikato Regional Plan. The Site is also located within the Waikato Central Drainage Scheme – Ngāruawāhia District.

The surrounding area to the north and west is zoned General Rural in the OiP. The land to the south and east is within Hamilton City and is subject to the following zones in the Hamilton City District Plan:

- To the south (opposite the Site across SH39): Medium Density Residential Zone and is within the Rotokauri North Structure Plan area;
- To the south east (opposite Koura Drive): Future Urban Zone with land identified for future industrial/employment development within the Rotokauri Structure Plan; and
- To the east (opposite SH1C) is the Te Rapa North Industrial Zone.

2.4.2 Existing consents – s30 FTAA

Section 30 of the FTAA addresses existing resource consents where a substantive application seeks a resource consent for an activity using the same natural resources as an existing consent.



On 10 August 2026, TKE provided WRC with notice under section 30(2) of the FTAA identifying the existing regional resource consents relevant to the Site and requesting confirmation under section 30(3) as to whether there are any existing resource consents that could prevent the resource consents sought through this Application from being fully exercised. WRC response under section 30(3) is included in **Volume A – Appendix C**.

The notice identified a number of existing regional resource consents associated with existing farming activities and investigations undertaken for the Project. These are summarised in **Table 2.2**. Table 2.2 also records the surface water take consent obtained to authorise the taking of water from the Waikato River via HCC's existing intake infrastructure to service the Project.

Table No. 2.2 Existing Regional Consents

Consent	Purpose	Consent Holder	Status/relevance
AUTH127639.01.01	Groundwater take at 284 Onion Road	TKE	Associated with existing dairy farming activities. Expires 30 November 2029.
AUTH119073.01.01	Discharge of farm animal effluent to land	-	Associated with existing farming activities.
AUTH144600.01.01	Well drilling at 270 Te Kowhai Road	Te Kowhai East General Partner Limited	Authorises ten well points associated with geotechnical and groundwater investigations for the Project.
AUTH148530.01.01	Well drilling at 28 Mathers Road	Kilroy Group Ltd	Authorises seven well points associated with geotechnical and groundwater investigations for the Project.
AUTH147743.01.01	Surface water take from the Waikato River	TKE	Authorises the taking of water from the Waikato River via HCC's existing intake infrastructure to service the Project.

The groundwater take consent and farm effluent discharge permit relate to the existing farming operation and are intended to be surrendered once those activities cease. Given the staged implementation of the Project, farming may continue on parts of the Site during the initial stages of development.

The well-drilling consents were obtained to enable geotechnical and groundwater investigations undertaken to inform the Project. The surface water take consent was obtained to secure the future potable water supply for the Project. Accordingly, no further water take consent for the Project's potable water supply is sought through this Application.

Thus there are no existing consents that could prevent the consents being applied for from being fully exercised.

2.5 Geology

The Site comprises two broad landforms, being the low-lying plains across the majority of the Site and the rolling hill country toward the northern boundary. The low-lying plains are underlain predominantly by Hinuera Formation soils comprising interbedded sands and silts. The northern rolling hill area is underlain by Walton Subgroup deposits comprising weathered volcanic and alluvial clays, silts and sands.

The GIR identifies shallow groundwater, variable settlement susceptibility and liquefaction-related deformation as relevant ground conditions across parts of the Site. These matters are capable of being managed through established earthworks, foundation and detailed-design measures.



Further detail on the geology and ground conditions is provided in the Geotechnical Investigation Report (**Volume B – Appendix R**).

2.6 Groundwater

Groundwater conditions vary across the Site due to changes in topography and geology. Groundwater is generally shallow across the low-lying areas of the Site, with monitoring indicating groundwater levels typically around 0.5–1.0 m below ground level during winter and lowering seasonally to approximately 2.0 m below ground level during summer. Groundwater is generally deeper within the northern rolling hill area. Groundwater flow across the low-lying areas is generally toward the Mangaheka Stream and the north-west, reflecting the Site topography and the influence of the stream and wider drainage network. The Mangaheka Stream is understood to locally draw shallow groundwater toward it, particularly during periods of higher winter groundwater levels. Further detail on the existing groundwater environment is provided in the Hydrogeological Assessment (**Volume B – Appendix Q**).

2.7 Surface water catchments

The Site lies within three surface water catchments: the Mangaheka Stream, Te Rapa Stream and Te Otamanui Stream catchments. The majority of the Site is located within the Mangaheka Stream catchment.

The Mangaheka Stream catchment covers approximately 2,080 ha and drains generally north-west toward the Waipā River. The Mangaheka Stream enters the Site from the south-east, traverses the Site and exits at the western boundary before continuing toward the Waipā River. The Mangaheka Stream corridor currently functions as a modified agricultural drainage system within a low-gradient rural catchment.

The Site also contains an extensive network of artificial farm drains that discharge toward the Mangaheka Stream. A smaller eastern part of the Site lies within the Te Rapa catchment, which drains generally toward the Waikato River. The Te Otamanui Stream catchment is located to the south of the Mangaheka Stream catchment and drains generally west toward the Waipā River. A short reach of the Te Otamanui Stream is present within the southern part of the Site.

2.8 Contaminated land

A Preliminary and Detailed Site Investigation (PSI–DSI) has been prepared for the Project by SLR Consulting included as **Volume B - Appendix N**. The PSI–DSI considers the potential for land contamination based on current and historical land uses and targeted soil sampling.

The PSI–DSI identifies a number of activities that have, or may have, occurred within the Site with the potential to cause land contamination. These include pastoral farming and cropping, farm infrastructure, fuel storage and vehicle maintenance activities, and buildings potentially containing asbestos-containing materials.

The investigation identified isolated areas that meet the definition of a “piece of land” under the NES-CS. However, the PSI–DSI concludes that soils across the majority of the Site are highly unlikely to present a risk to human health or the environment during the proposed development activities. Localised soil will require specific management where removed from the Site. The Site is also not considered to meet the definition of contaminated land under the WRP.



2.9 Transport environment

The existing transport environment is described in detail in the Integrated Transportation Assessment prepared by CKL (ITA) included as **Volume B - Appendix L**.

The surrounding transport network comprises a combination of strategic state highway connections and lower-order rural and industrial roads. SH1C forms part of the Waikato Expressway. SH39 / Koura Drive provides east–west connectivity between the Expressway, Te Kowhai and the western Waikato, while Onion Road provides a lower-volume local connection towards Holmes Road, Gateway Drive, Horotiu and the Northgate industrial area.

The roads immediately adjoining the Site generally retain a rural character, transitioning to a more urban and industrial form to the east and north-east. Existing traffic volumes recorded are approximately 13,159 vpd on SH1C, 5,880 vpd on SH39 and 444 vpd on Onion Road east of Mathers Road. Heavy commercial vehicles form a notable component of traffic on the strategic network, consistent with the surrounding industrial and freight-generating activities.

Existing walking and cycling provision is limited in the vicinity of the site. Shared-path facilities are provided along parts of SH1C, around the SH39 / Burbush Road intersection and through the more developed areas to the north and east, but there is currently no comprehensive active-mode network serving the Site. There is no public transport service immediately adjoining the Site. The nearest bus stops are on Te Rapa Road, with the Rotokauri Transport Hub and The Base Bus Hub providing the nearest significant public transport facilities.

2.10 Landscape, visual amenity and natural character

The existing landscape characteristics are described in detail in the Landscape Assessment prepared by Adrian Morton Landscape Architects, included as **Volume B – Appendix J**.

The Site forms part of a predominantly open rural landscape on the north-western edge of Hamilton, characterised by generally flat to gently rolling pastoral and cropping land, shelterbelts, scattered trees and rural-residential properties. The wider landscape sits within an environment experiencing a significant rural–urban transition and is influenced by major transport infrastructure and established and emerging urban and industrial development to the east, south-east and north. Existing shelterbelts and scattered vegetation provide some visual containment within the otherwise open landscape.

The Site itself is highly modified, contains no significant areas of indigenous vegetation and has limited natural character. The Mangaheka Stream is also highly modified and channelised, with limited riparian vegetation, and forms part of the wider modified drainage network across the Site.

The Site is reasonably contained at the wider landscape scale by landform and vegetation, but a number of immediately adjoining and elevated rural-residential properties, particularly along Onion Road and Te Kowhai Road, currently have relatively open views across the Site.

2.11 Ecological environment

The ecological environment associated with the site has been assessed by Ecological Solutions Limited in the Ecological Impact Assessment (EcIA) included as **Volume B - Appendix M**.



2.11.1 Terrestrial vegetation and habitats

The site is predominantly a highly modified agricultural environment. Terrestrial vegetation comprises approximately 154.6 ha of high-producing exotic grassland, areas of cropping, scattered paddock trees, approximately 4,945 m of exotic shelterbelts and hedgerows, and areas of exotic scrub and rank vegetation associated with drains, watercourses and farm infrastructure.

Indigenous vegetation is limited. A small area of regenerating native bracken fernland, approximately 232 m² in extent, occurs alongside an artificial drain. Native fern species are also scattered through some areas of otherwise exotic scrub and vegetation. No plant species of botanical or conservation interest were recorded during ecological surveys.

Overall, terrestrial vegetation within the Site is assessed as having **negligible to low ecological value**. Native fernland and exotic scrub/vegetation are assessed as low value, while exotic pasture, cropping, shelterbelts, hedgerows and paddock trees are assessed as negligible value.

2.11.2 Avifauna

The bird assemblage within the site is characteristic of a modified rural environment and comprises common indigenous and introduced species. Native species observed include pūkeko, spur-winged plover, swamp harrier and welcome swallow. The site provides potential foraging, roosting and nesting habitat, principally within trees, shelterbelts, hedgerows and scrub, but is not considered to provide important breeding habitat for bird species of conservation concern. Overall, birds and bird habitat are assessed as having **low ecological value**.

2.11.3 Herpetofauna

Potential native lizard habitat occurs in small and dispersed areas of fernland, rank vegetation, shelterbelts, hedgerows, scrub, debris and around existing farm buildings. No indigenous lizards were detected during manual searches, although copper skink (*Oligosoma aeneum*), which is classified At Risk – Declining, is considered likely to occur in low numbers. The available habitat is generally low quality and fragmented, but the overall ecological value for lizards is assessed as **moderate**, reflecting the conservation status of copper skink.

2.11.4 Bats

Long-tailed bats are classified Threatened – Nationally Critical and have previously been recorded approximately 2–3 km from the site. A Project-specific acoustic survey was undertaken using 21 automatic bat monitors over 28 nights during December 2025 and January 2026. No confirmed bat activity was detected. While some isolated trees and shelterbelts contain potential roosting or foraging features, these habitats are generally isolated and of low quality. The site is not considered important bat habitat, although the overall ecological value for bats is assessed as **moderate** due to the conservation status of the species.

2.11.5 Freshwater ecology

The principal freshwater features within the Site are the Mangaheka Stream, approximately 135 m of the Te Otamanui Stream, the 212 m long modified watercourse identified as M13, and an extensive network of artificial farm drains. The Mangaheka and Te Otamanui Streams have both been substantially modified through historic straightening and deepening, while the farm drains are artificial watercourses established for agricultural drainage.



The Mangaheka Stream and other modified streams generally have limited habitat diversity, steep or incised banks, little effective riparian shading and predominantly fine silt substrates. Stream Ecological Valuation surveys undertaken in May 2026 produced low scores of between 0.201 and 0.234, reflecting the modified channel form, limited riparian vegetation and generally poor ecological function.

Despite its modified condition, the Mangaheka Stream supports indigenous freshwater fish, including At Risk species such as longfin eel, banded kōkopu and giant kōkopu. The EclA assesses the Mangaheka Stream within the Site as having **moderate ecological value**, reflecting its highly modified physical condition and low ecological function, together with the presence of fish species of conservation interest. The Te Otamanui Stream is also highly modified and provides habitat for indigenous freshwater fauna.

The artificial farm drains are generally straight, shallow, poorly shaded and of low habitat complexity. However, surveys have confirmed the presence of black mudfish (*Neochanna diversus*), an At Risk – Declining species, within parts of the drain network. Other indigenous fish detected within the Site include shortfin eel, longfin eel and giant kōkopu.

Black mudfish have been recorded in several drains within the Site and in the NZTA drain immediately east of the Site. Artificial drains without confirmed black mudfish are presently assessed in the EclA as having **low ecological value**, while drains supporting black mudfish are assessed as having **moderate ecological value**. The artificial drains supporting black mudfish are also identified as significant habitat under the significance criteria of the Waikato Regional Policy Statement.

2.11.6 Wetland environments

Ecological surveys identified small, discrete areas of damp pasture and periodically ponded ground within the Site. These areas are highly modified by agricultural use, dominated by exotic pasture and wet-tolerant exotic species, and generally have no surface connection to other freshwater features. The EclA concludes that no areas within the Site meet the RMA definition of wetland. Historic peat bog and wetland communities formerly associated with the wider Hamilton Basin are no longer present within the Site.

2.12 Archaeology

An Archaeological Assessment of Effects has been prepared for the site by RedOx Cultural Heritage Services. The assessment included a review of recorded archaeological sites, historical plans and aerial photographs, LiDAR data and previous archaeological investigations, together with a two-day field survey of the Site comprising pedestrian inspection and soil auger testing.

There are no recorded archaeological sites within the Site and the investigations did not identify any unrecorded archaeological sites, archaeological soils, features or deposits. Recorded archaeological sites within the wider area are located more than 1 km from the Site and are principally associated with pre-European Māori horticulture and occupation along the Waikato River corridor. The assessment concludes that the Site has very low to nil potential for unrecorded archaeology and that no archaeological authority from Heritage New Zealand Pouhere Taonga is required for the Project.

Heritage New Zealand has separately confirmed that an archaeological authority is not required prior to works commencing, and recommends accidental discovery protocols are implemented during ground disturbance activities. Conditions have been included to this extent.



3. Description of the Project

3.1 Overview

The Project provides for the comprehensive development of an approximately 187.5 ha site as a masterplanned industrial precinct. The application is for a comprehensive suite of resource consents and required approvals to implement the development outcome.

Following construction and establishment of the supporting infrastructure and services, including the internal road network, three waters infrastructure, stormwater management systems and utilities, the Project will provide approximately 123 ha of net developable industrial land to the market. Together, these elements have been planned as an integrated response to the Site's opportunities and constraints, balancing the efficient use of the land and maximisation of net developable industrial area with the need to appropriately service the development and manage potential adverse effects.

Alongside the Masterplan, the Site is governed by the proposed Development Framework¹⁸ which identifies the range and location of activities that may appropriately establish within the development over time, without prescribing the specific future uses or occupiers of individual lots at the time of subdivision. The Development Framework is described in more detail in Section 3.1.2 of this report.

At a high level, the Project comprises:

- The staged subdivision of the Site to create approximately 210 industrial lots, together with land for a Neighbourhood Centre, a rural-residential lot, and lots accommodating the roading, stormwater and other infrastructure services;
- Land use approval to enable the future establishment and operation of industrial and neighbourhood centre activities and compatible supporting activities in accordance with the Development Framework;
- Bulk earthworks and ground improvements required to establish development platforms, road corridors and infrastructure to prepare the site for development;
- A new internal public road network, with primary access from Te Kowhai Road (SH39) and a secondary access from Onion Road, together with provision for walking and cycling networks;
- New water supply, wastewater, stormwater and utility infrastructure to service the development;
- An integrated stormwater and flood management network comprising reticulation, swale conveyance channels, wetlands, raingardens, overland flow paths and upgrades to the Mangaheka Stream, all held within stormwater reserves;
- Ecological mitigation and enhancement, including riparian restoration, habitat creation and measures for the management of indigenous fauna; and
- A site-specific landscape framework that responds to the Mangaheka Stream corridor, stormwater areas, shared paths and site interfaces, providing a consistent landscape treatment that ties the development together and supports ecological enhancement and ecosystem function.

The Project will be delivered progressively in stages. The Masterplan establishes the overall spatial framework within which that staged development will occur, while the Development Framework establishes the land use and built form parameters that will guide future development of individual sites.

The principal components of the Project are described in the following sections. Detailed design, methodology and effects assessments are addressed in the relevant technical reports accompanying this application.

¹⁸ Embedded into the proposed Draft Conditions.



3.1.1 Masterplan

The Te Kowhai East Masterplan establishes the overarching spatial framework for the Project and illustrates, at a high level, the intended form and arrangement of development across the Site. It has been informed by the physical characteristics of the Site, its relationship with surrounding land uses and transport networks, and the earthworks, infrastructure servicing, stormwater, flooding, hydrogeological, ecological, geotechnical, landscape and constructability considerations associated with developing the land for industrial purposes. The Masterplan is shown in **Figure 2**.

The Masterplan and the urban design considerations that have informed its development are described in detail in the Urban Design Statement prepared by Adapt Studio, including the Folio of Masterplan Figures appended to that report (refer to **Volume B - Appendix I**). The following summarises the key spatial and design elements of the Masterplan:

- **Mangaheka Stream corridor:** The Mangaheka Stream is a key existing feature of the Site, extending generally from the south-east in a north-west/westerly direction. The Masterplan integrates the stream corridor with stormwater management, ecological restoration and enhancement, landscaping and shared pedestrian and cycle connections, enabling the corridor to perform various functions.
- **Movement network:** A primary collector road forms the main internal movement loop, connecting with Te Kowhai Road and Onion Road and supported by a network of local industrial roads. This establishes a clear hierarchy of movement, provides access throughout the development and accommodates the range of vehicle types and transport modes anticipated to use the Site. The road network also assists in establishing a legible subdivision pattern and the orientation and configuration of development blocks.
- **Flexible industrial development blocks:** The Masterplan establishes relatively large development blocks capable of being subdivided into a range of lot sizes to respond to future industrial occupiers and market requirements. While individual lot boundaries may change as the development is implemented, the principal road corridors, stormwater infrastructure and other key structural elements provide the enduring spatial framework for development of the Site. The proposed subdivision and associated flexibility are described further in Section 3.1.3.
- **Neighbourhood Centre and Non-industrial Precinct:** A 2 ha Neighbourhood Centre is located centrally within the development. The Neighbourhood Centre sits within a broader non-industrial land use precinct, which provides for the establishment and grouping of a limited range of identified non-industrial activities that are compatible with, and complementary to, the surrounding industrial activities. This approach concentrates supporting services and activities within a central, accessible location rather than dispersing them throughout the wider industrial area.
- **Site Interfaces and Landscape Integration:** The Masterplan incorporates a site-specific landscape framework that responds to the Site's wider landscape context and key on-site features. Landscape outcomes are integrated with the principal spatial elements of the development, including the Mangaheka Stream corridor, stormwater areas, shared paths and 16 m wide landscape/stormwater buffers are provided around much of the Site perimeter, to provide a coherent landscape response across the Site and appropriately complement the interface with adjoining land and land uses.

3.1.2 Development Framework

The Project includes a site-specific Development Framework to govern the future use and development of land within the TKE Site following subdivision and/or sale of individual lots. It establishes the range and location of activities that may occur, together with the development standards and assessment requirements that will apply to future development on the lots. The Development Framework is included in **Volume A –**



Appendix D, together with the accompanying Development Framework Justification, which explains the basis for the provisions and the key departures from the underlying district plan framework.

The Development Framework has been developed using the Industrial Zone provisions of the Hamilton City Council Operative District Plan (HCC ODP), with amendments to reflect the Site's location, masterplan and intended development outcomes. The Development Framework has been developed in coordination with HCC and WDC and refined, where agreed, to incorporate feedback received from both Councils. The rationale for the activity framework, development standards and project-specific amendments is set out in the Development Framework Justification.

The Development Framework will be incorporated into the land use consent and will provide the ongoing planning framework for the establishment and development of activities across the Site. This is important given the underlying land is presently zoned General Rural under the WDP OIP. Without the land use/development framework, future industrial occupiers would otherwise require separate resource consents for activities that are anticipated as part of the approved industrial development. Incorporating the Development Framework into the land use consent therefore avoids unnecessary duplication of consenting, while retaining appropriate controls over the nature, scale and location of activities and ensuring that future development remains within the scope of the effects assessed through this substantive application.

As the subdivision proceeds, consent notices will be registered against the records of title for the new lots to ensure that future owners and occupiers are aware of, and remain subject to, the relevant requirements of the land use consent and Development Framework. This approach provides an enduring and integrated consent framework for the Site to ensure activities are established in accordance with what is anticipated and assessed through this substantive application.

At a high level, the activities provided for within the Development Framework are summarised below. The detailed activity definitions, thresholds, locational requirements and development standards are set out in the Development Framework in **Volume A – Appendix D**.

Table No. 3.1 Development Framework Activities

Area	Activities provided for
Industrial Areas	Industrial activities and associated ancillary retail and offices; public transport facilities; parking lots and parking buildings; emergency service facilities; battery storage facilities; data centres; ancillary residential units subject to the specified standards; food and beverage outlets; and boarding kennels and catteries.
Non-industrial land use precinct	All activities provided for within the wider industrial area, together with places of worship; gymnasium; childcare; wholesale membership retail; wholesale retail trade and supplier activities; yard-based retail; and an outdoor golf driving range.
Neighbourhood Centre	Retail and supermarket activities; restaurants, cafés and licensed premises; gymnasium; public transport facilities; health facilities; childcare and community facilities; tertiary education and specialised training; places of worship; offices; and residential units above ground-floor level, subject to the thresholds contained in the Development Framework.

In addition to controlling the nature and location of activities, the Development Framework establishes the bulk, location and site development standards applicable to future development, addressing matters such as building height and setbacks, site coverage, landscaping, site layout, servicing, outdoor storage and the relationship of development with adjoining roads and public areas. Separate performance standards apply to the industrial areas and the Neighbourhood Centre to reflect their different intended functions and built form.



Implementation of the Development Framework provides certainty as to the overall nature, scale and form of development anticipated within TKE, while retaining the flexibility necessary for individual sites to respond to future occupier requirements and market demand.

3.1.3 Subdivision and Proposed Staging

The Project includes subdivision of the Site to create development-ready industrial lots, together with the road, stormwater and other infrastructure lots required to support the development. The subdivision scheme plans prepared by Maven Associates are included in **Volume B - Appendix O** and show the proposed overall subdivision layout and staging.

The subdivision layout has been developed to give effect to the Masterplan and provides an indicative configuration of industrial lots within the principal road, stormwater and infrastructure framework established for the Site. As the future purchasers and end-users of the industrial land are not yet known, the final size and configuration of individual development lots cannot reasonably be fixed at this stage. The proposed conditions therefore incorporate flexibility to enable lot layouts to respond to market demand and purchaser requirements, while maintaining the key planning, access, servicing and stormwater outcomes approved through this application.

Staging

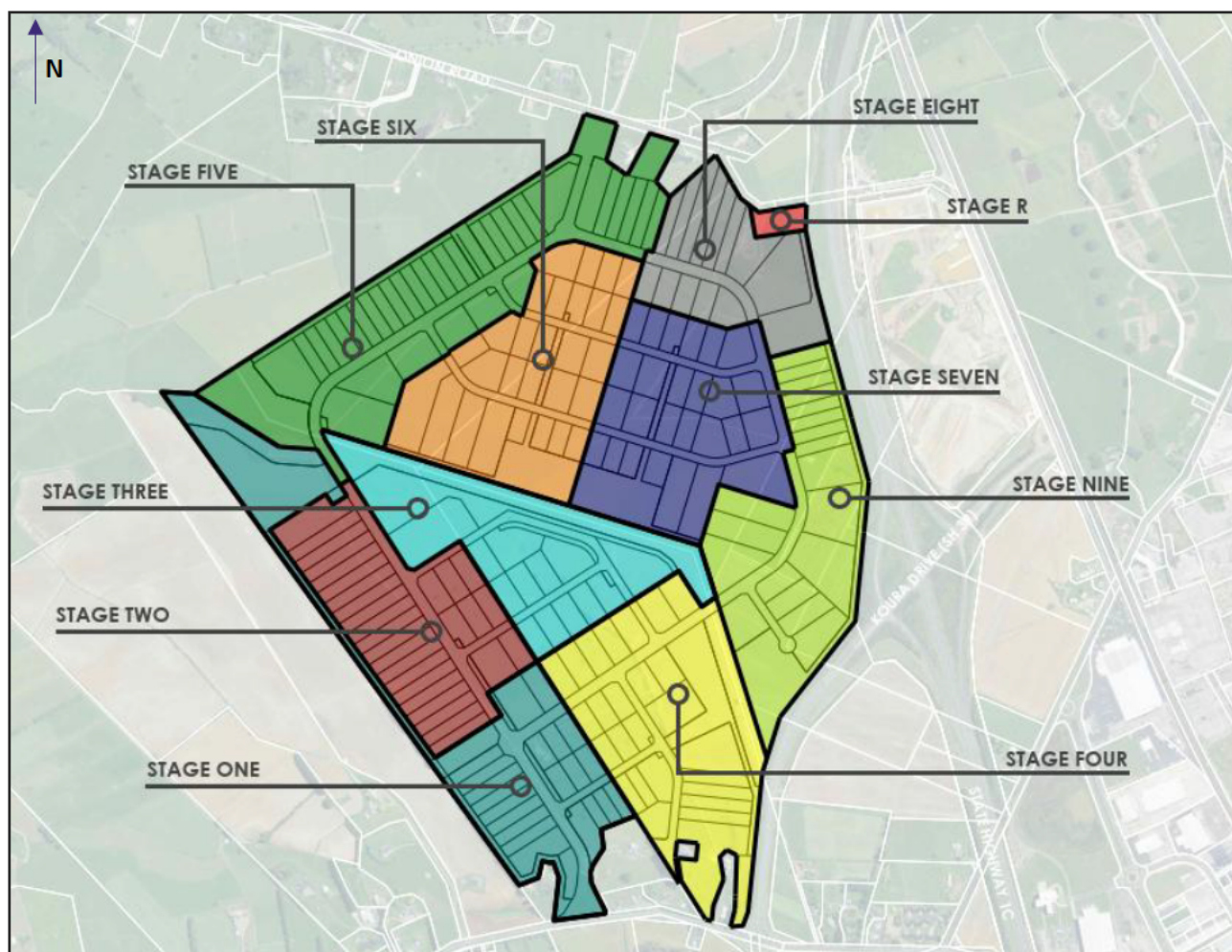
The subdivision is divided into nine stages (see **Figure 7**). The stage boundaries have been informed primarily by the stormwater sub-catchments across the Site and the logical and efficient provision of the road and three waters infrastructure required to service each area. The staging also enables land to be progressively released in response to market demand and uptake.

The nine stages establish the spatial framework for delivery of the subdivision; however, they are not required to be completed in numerical order. The proposed conditions allow stages to proceed concurrently or out of sequence where the relevant stage can be appropriately accessed and serviced, forms a logical and coherent area of development, and does not compromise the servicing or future development of the balance of the Site.

For clarity, this flexibility relates to the sequencing of stages and the configuration of lots within them. The approved stage boundaries themselves are not proposed to be altered through the subdivision flexibility mechanism.



Figure 7: Staging Plan¹⁹



Lot layout flexibility

The individual industrial lot boundaries shown on the scheme plans represent a practicable subdivision configuration but are not intended to prescribe the final lot pattern across the development. Future industrial occupiers may have significantly different land area, frontage and configuration requirements, which cannot be known at the time of this Application.

The proposed conditions therefore provide a mechanism for the subdivision layout within each stage to be refined as the development progresses. Lot boundaries may be amended prior to section 223 certification, subject to specified parameters relating to lot size and frontage, legal and physical access, infrastructure servicing and stormwater management. Any revised layout must demonstrate that the resulting lots can continue to be appropriately serviced and that the overland flow network achieves equivalent or better conveyance to the nominated discharge locations.

The conditions also recognise that aspects of the supporting infrastructure may require refinement through detailed design. Material departures from the road layout may be certified where the revised design continues to achieve the intended function, safety and level of service of the road and does not result in materially different or greater adverse effects than those assessed as part of this Application. Similarly, departures from the approved stormwater design may be certified where an equivalent or better stormwater management outcome is achieved, and the effects remain consistent with those assessed for the Project.

¹⁹ Adapt Studio Ltd, *Te Kowhai East Industrial Development Urban Design Statement* (FINAL, 25 August 2026), Figure 10 – Illustrative Masterplan Concept.



This approach provides appropriate flexibility to respond to future purchaser requirements and detailed engineering design, while retaining the key servicing, transport, stormwater and environmental outcomes established through this Application. It also avoids unnecessary additional consenting where refinements remain within the scope and effects of the Project as assessed.

Easements and title arrangements

A range of easements will be created as part of the subdivision to provide legal access and protect infrastructure that crosses or serves individual lots. These include, as applicable, easements for stormwater and overland flow paths, wastewater and water supply infrastructure, electricity and telecommunications, maintenance access and other shared or public infrastructure. The final easements required for each stage will be identified on the relevant survey plan at section 223 certification.

Consent notices

Consent notices under section 221 of the RMA will be registered on the relevant new titles at the time of subdivision, to secure requirements that need to be addressed at the time of future development, or otherwise continue to apply after completion of the subdivision. This is particularly important for TKE because the final built development and occupiers of individual industrial lots are not known at the subdivision stage.

The consent notices that are proposed for TKE include those relating to:

- **Geotechnical requirements** – requiring future development to have regard to, and comply with, the recommendations of the relevant Geotechnical Completion Report which is prepared after bulk earthworks and site preparation are completed at the time of subdivision.
- **Land use consent requirements** – linking future development of the lots to the land use consent and the associated Development Framework approved as part of this Application.
- **On-lot stormwater management** – securing the lot-specific stormwater quantity and quality requirements identified through detailed design and the Site Suitability Report for each subdivision stage, including retention, reuse, soakage, detention, treatment, and other source-control measures (refer to Section 3.2 below for further detail on stormwater management).
- **Site-specific requirements** – where particular lots require additional controls arising from their location or servicing arrangements. For example, Lot 89 will be subject to specific requirements governing the management and discharge of stormwater at the time that lot is developed.

Infrastructure triggers

The draft subdivision conditions also establish a series of infrastructure triggers that coordinate the release of development with the delivery of the transport, water supply, wastewater and stormwater infrastructure required to support it. A subdivision stage will not be able to obtain section 224(c) certification where doing so would exceed an identified infrastructure threshold unless the corresponding infrastructure requirement has been satisfied.

The trigger framework also allows strategic infrastructure to be constructed and commissioned independently of the subdivision stage in which it is physically located where it is required to service an earlier stage. The particular infrastructure requirements and trigger points are described in the relevant servicing and transport sections below.



3.2 Infrastructure Design

The Project includes the construction of the civil infrastructure required to service the staged industrial development, including the internal road network, stormwater and flood management, wastewater and water-supply networks, and power and telecommunications services.

The infrastructure strategy has been developed on a site-wide basis and integrated with the subdivision staging, earthworks, stormwater management and wider Masterplan to ensure that each stage can be appropriately accessed and serviced as development progresses. Given the Site directly adjoins Hamilton City's existing and planned urban infrastructure networks, the servicing strategy provides for connection to those wider networks, as agreed through consultation with HCC, WDC and IAWAI.

The infrastructure will be delivered progressively, with the extent and timing of works for each stage determined by the servicing requirements of that stage and the relevant infrastructure capacity and delivery triggers. Detailed design will be undertaken through the engineering approval process in accordance with the subdivision consent conditions and applicable engineering standards.

The following sections describe the principal infrastructure proposed and how each component will enable development of the Site. Further technical detail, including design assumptions, modelling, staging and engineering requirements, is provided in the Civil Infrastructure Report²⁰ and/or the Stormwater Management Plan²¹ prepared by Maven Associates and the ITA²² prepared by CKL.

3.2.1 Water Supply

General

Water supply for TKE will be provided through a new public water supply network within the development, connected to Hamilton's existing public water supply system. The servicing strategy provides for an interim connection to the existing network at Ruffell Road / Arthur Porter Drive, providing an interim servicing pathway for the initial stages of development, subject to any required external upgrades. The ultimate strategic solution comprises a new reservoir within the Site and a bulk water connection to Hamilton's existing bulk water network. The ultimate network is intended to provide the long-term water supply required to service the full development.

The Applicant has separately obtained WRC water take consent AUTH147743.01.01, authorising the taking of up to 2,200 m³/day from the Waikato River for municipal supply purposes associated with TKE. Water authorised by that consent will be taken through the existing Waiora Water Treatment Plant intake structure and supplied to the development through the existing IAWAI water treatment and reticulation network. No new intake infrastructure within the Waikato River is required. The consent is intended to be transferred to IAWAI, in due course, supplementing the water allocation available through the public network to service the TKE Site. The water take consent was obtained in advance of this Application to provide certainty that sufficient water allocation was available to service the development and to give the Applicant and infrastructure providers confidence in the viability of the proposed water supply strategy.

Water demand and network performance have been assessed through hydraulic modelling undertaken for the Project in consultation with HCC, WDC and IAWAI. The assessment considers anticipated industrial water demand and firefighting requirements and confirms that the proposed internal network can provide the required level of service, subject to the external supply arrangements being established as required.

²⁰ Volume B – Appendix O

²¹ Volume B – Appendix O (being Appendix D of that report)

²² Volume B – Appendix L



On-site Reticulation and lot connections

A new public water supply reticulation network will be constructed throughout the Site, with watermain lines provided along both sides of the internal road network in accordance with RITS. The network will provide potable water supply and the required firefighting capacity, including fire hydrants, to each stage of the development.

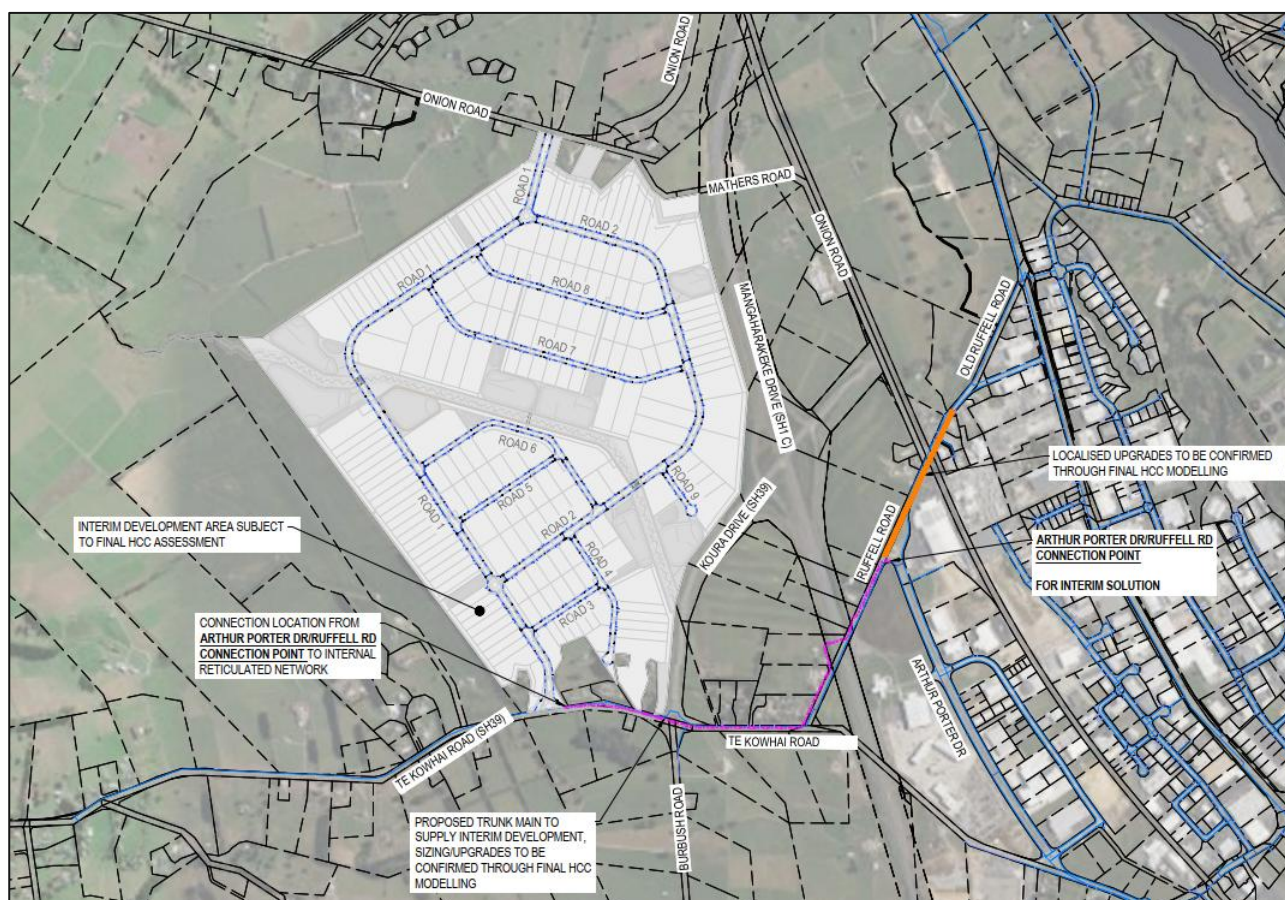
Each development lot will be provided with a separate metered water connection. Given the flexibility proposed for the final industrial lot boundaries, the precise location and sizing of individual lot connections will be confirmed through detailed design and the Engineering Plan Approval process for each stage. Connection locations will be coordinated with vehicle crossings, street trees, lighting, stormwater devices and other services within the road corridor to ensure an integrated streetscape and servicing layout.

The Development Framework provides some activities that have the potential for higher than typical water demand (such as data centres). While these activities are provided for in principle, any proposed activity requiring more than 15 m³/day of water will be subject to further assessment prior to establishment to confirm that sufficient network capacity is available and that the proposed demand can be accommodated by the public water supply network.

Interim Servicing Solution – Connection to existing network

The interim servicing solution comprises a connection to the existing water network at Ruffell Road / Arthur Porter Drive, as shown in **Figure 8** below.

Figure 8: Interim Water Supply Servicing Solution²³



²³ Maven Associates, *Te Kowhai East Civil Infrastructure Report (28 August 2026, Revision A) – Appendix B, Drawing C605 Rev A*



This provides a feasible pathway for servicing the initial stages of development while the ultimate infrastructure is established. HCC has advised that some upgrades to the existing external network may be required around the Ruffell Road connection. The confirmed interim servicing capacity, network pressures, connection configuration and scope of any associated external upgrades will be established through HCC hydraulic modelling and confirmed with HCC and IAWAI prior to engineering approval.

The interim connection is required to be commissioned and operational before section 224(c) certification for Stage 1. Its route is shown by the purple dashed line at the south end of the site in **Figure 8** above.

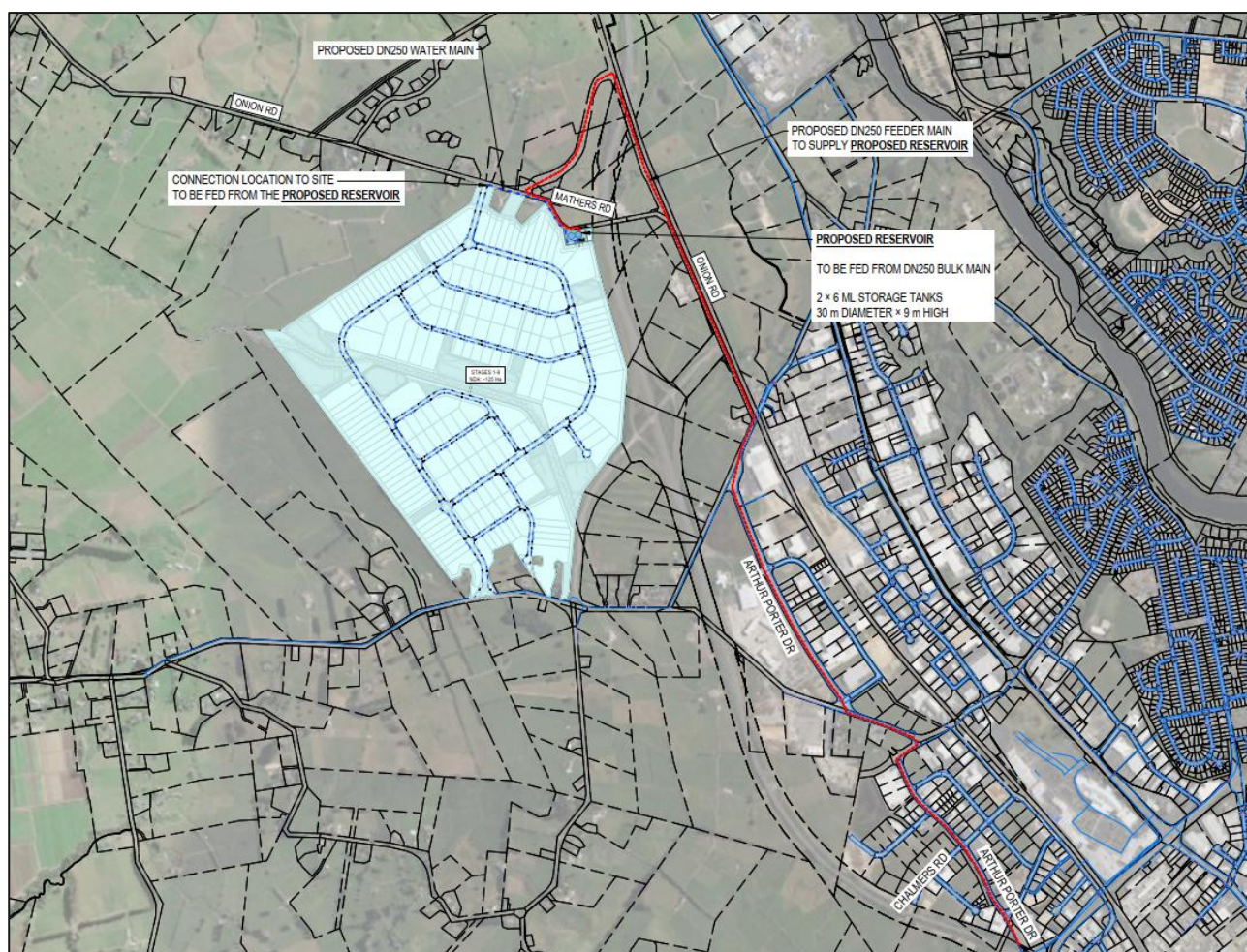
Ultimate Servicing Solution – Bulk water connection to existing network

The ultimate servicing solution comprises a strategic, above ground water reservoir within the Site (proposed at the north-eastern corner of the site²⁴), together with a feed main connecting the reservoir to the existing Hamilton bulk water network at Rotokauri Road via Arthur Porter Drive, as shown by the red line on **Figure 9** below. The indicative reservoir arrangement is shown on the engineering drawings in Volume B – Appendix O, with the final storage capacity, dimensions and configuration to be confirmed through detailed design and engagement with IAWAI. Strategic network modelling undertaken for HCC and IAWAI indicates that the existing bulk network can support the proposed strategic servicing solution (i.e. the proposed TKE reservoir). To implement the ultimate solution, detailed design and delivery of the TKE reservoir, feed-main sizing and any associated pressure-management requirements are required. From the reservoir, water will be distributed throughout the TKE development via the internal public watermain network, providing potable supply and firefighting capacity to each stage.

²⁴ Within Stage R.



Figure 9: Ultimate water supply servicing solution²⁵



Conclusion of Water Supply

The servicing strategy enables water supply infrastructure to be delivered progressively as the site is developed. The proposed infrastructure triggers require the ultimate reservoir, bulk main and associated pumping, pressure-management and connection infrastructure to be constructed, commissioned and operational by the specified trigger, ensuring that development cannot proceed beyond the capacity of the available water supply infrastructure. The proposed conditions specify 1 November 2033 as the trigger for delivery of the ultimate solution.

The public water supply infrastructure will be designed to provide safe and practical access for operation and maintenance and is expected to ultimately be owned and operated by IAWAI. Final ownership, operation, maintenance and asset-handover requirements will be confirmed through detailed design, engineering approval and the relevant development and infrastructure agreements, through the subdivision process.

3.2.2 Wastewater

Wastewater from TKE will be collected through a new public gravity reticulation network within the development and conveyed to a new wastewater pump station to be constructed as part of Stage 1. From the pump station, wastewater will be discharged via a rising main to the wider Hamilton wastewater network. In the absence of the long-term permanent wastewater network, the servicing strategy provides for an

²⁵ Maven Associates, *Te Kowhai East Civil Infrastructure Report (28 August 2026, Revision A) – Appendix B, Drawing C606 Rev A*



interim connection to the Far Western Interceptor, which has been agreed with IAWAI and will enable the initial stages of development to proceed.

The ultimate wastewater servicing solution is connection to the planned Northern Interceptor. Delivery of the Northern Interceptor is dependent on IAWAI's wider infrastructure programme and its precise commissioning date is therefore outside the Applicant's control. The Project has nevertheless been designed to transition to that network once it is available, with the proposed consent conditions requiring the strategic wastewater connection to be constructed, commissioned and operational within 24 months following commissioning of the Northern Interceptor.

On-site infrastructure and lot connections

A new gravity wastewater network will be constructed throughout the development, predominantly within the proposed public road and maintenance corridors. The internal gravity network will convey wastewater to a single wastewater pump station constructed as part of Stage 1. The pump station will be capable of servicing both the interim and ultimate arrangements, with pumps able to be upgraded as development demand increases. Final pipe sizes, grades, manhole locations, pump configuration, rising main design and connection details will be confirmed through detailed design and engineering approval.

Each industrial lot will be provided with a separate wastewater connection to the public network. Given the proposed flexibility in final lot boundaries, as per the water supply lot connections, the precise location and sizing of individual lot connections will be confirmed through detailed design and the Engineering Plan Approval process for each stage.

Wastewater Demand and Capacity

Wastewater demand has been assessed based on the anticipated industrial development of the Site. The wastewater servicing strategy assumes predominantly domestic-strength wastewater associated with light industrial development. Where future occupiers propose trade waste or other atypical discharges, those discharges will be considered separately at the time of development.

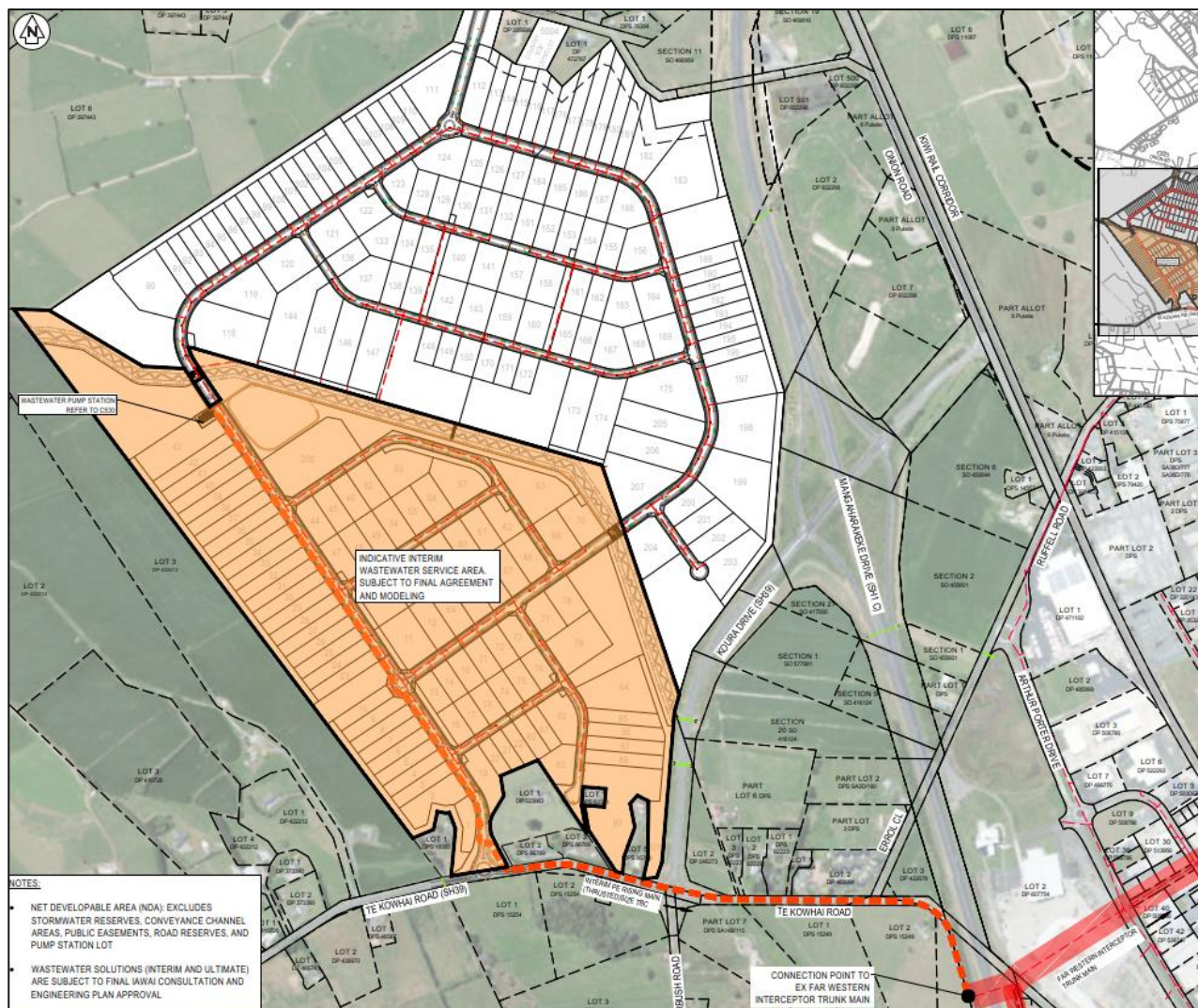
The pump station and internal wastewater network have been designed to accommodate the anticipated development flows. As each stage is delivered, the available downstream network capacity and applicable operating requirements will be confirmed with IAWAI through the normal Engineering Plan Approval process, informed by updated network modelling where required.

Interim Servicing Strategy – connection to existing network

The interim wastewater solution comprises discharge from the TKE pump station via a rising main to the existing Far Western Interceptor, as shown in **Figure 10** below. This interim servicing arrangement has been agreed with IAWAI and will enable the initial stages of the development to proceed ahead of delivery of the Northern Interceptor. The interim connection is required to be constructed, commissioned and operational before section 224(c) certification for Stage 1.



Figure 10: Interim wastewater servicing strategy²⁶



Ultimate Servicing Strategy – connection to existing network

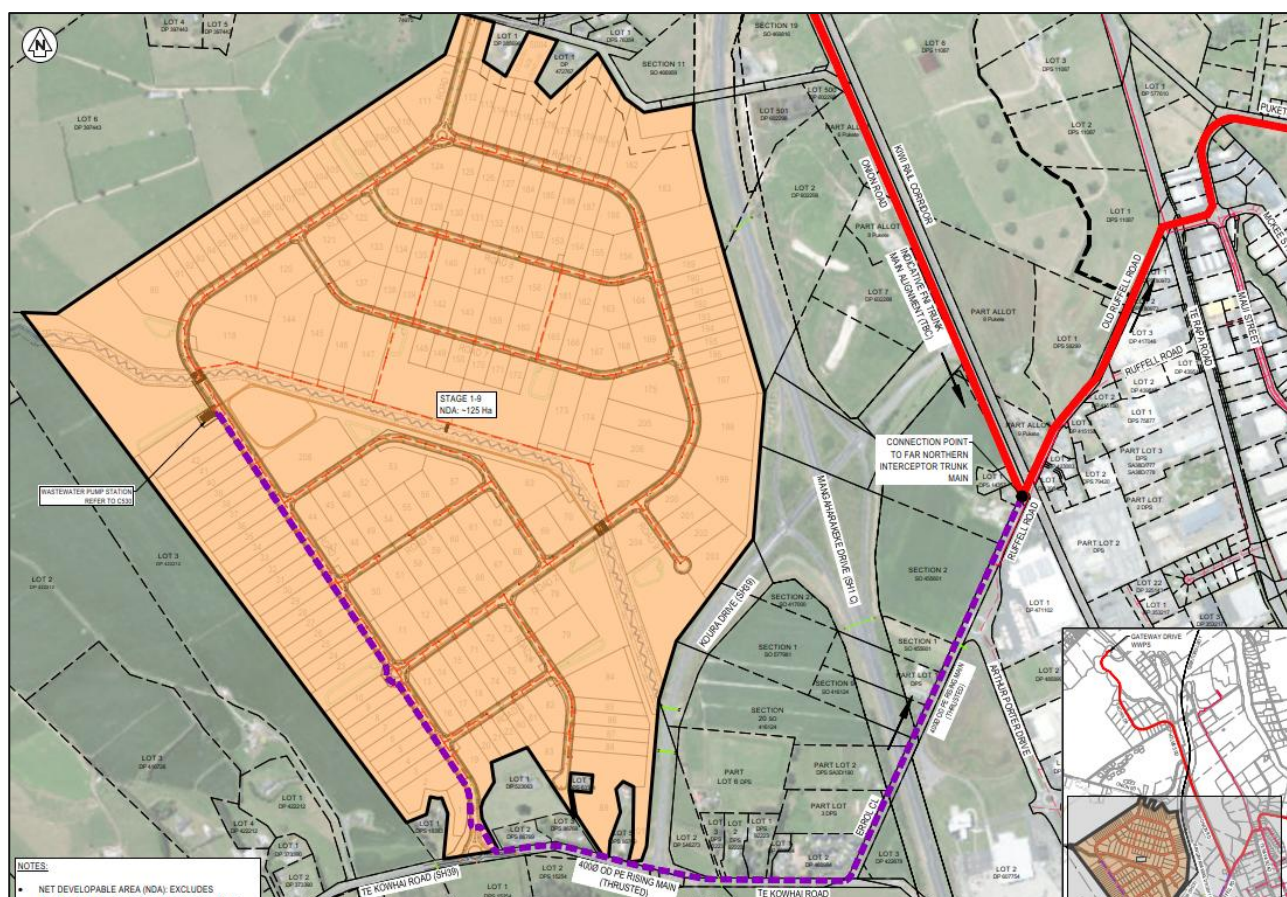
The ultimate wastewater solution will redirect wastewater from the TKE pump station to the planned Northern Interceptor, as shown in **Figure 11** below. The pump station and rising main will be able to accommodate the transition from the interim to ultimate connection as the development progresses.

The subdivision conditions secure the transition to the ultimate wastewater solution, including delivery of the rising main to the agreed Northern Interceptor connection point within the timeframe specified in the development agreement and consent conditions (i.e. 24 months of the Northern Interceptor being commissioned).

²⁶ Maven Associates, *Te Kowhai East Civil Infrastructure Report (28 August 2026, Revision A) – Appendix B, Drawing C540 Rev A*



Figure 11: Ultimate wastewater servicing strategy²⁷



Conclusion of Wastewater

Overall, the proposed wastewater servicing strategy provides a clear and staged pathway for servicing TKE, with the interim connection enabling early development and the ultimate connection to the Northern Interceptor providing the long-term solution for the full Site build-out. The internal gravity network, pump station and rising main will be progressively delivered to match subdivision staging and demand, with the detailed design and final connection arrangements confirmed through the Engineering Plan Approval process. Public wastewater infrastructure will be designed to allow appropriate access for inspection, maintenance and emergency response and, following completion and asset handover, is intended to be owned and operated by IAWAI.

3.2.3 Stormwater Management and Flooding

Stormwater management is a key component of the Project. The change from rural land to industrial development will substantially increase impervious surface area and, without mitigation, would increase the rate and volume of stormwater runoff and associated flood, erosion and water quality effects.

The receiving environment is particularly constrained from a stormwater and flood-management perspective. The Site and wider Mangaheka catchment are characterised by low gradients, an existing rural drainage network and areas of existing flood inundation, with the Mangaheka Stream currently unable to contain peak flows within its banks during larger storm events. Downstream flows are also influenced by WRC-managed land drainage infrastructure and existing hydraulic restrictions. The stormwater system has

²⁷ Maven Associates, Te Kowhai East Civil Infrastructure Report (28 August 2026, Revision A) – Appendix B, Drawing C541 Rev A



For the purposes of the design and assessment of stormwater and flooding effects, it is assumed that the perimeter lots around the eastern, northern and western site boundaries are developed to 100% imperviousness and the internal lots will be a maximum of 90% impervious. Refer to the below **Figure 12** identifying (in grey) the 100% impervious lots and (in pink) the 90% impervious lots.

³⁰ Maven Associates, Te Kowhai East Civil Infrastructure Report (28 August 2026, Revision A) – Appendix B, Drawing C485 Rev A

On-site Stormwater Catchments and Discharges

The Site is predominantly located within the upper Mangaheka Stream catchment, with a smaller eastern portion located within the Te Rapa Stream catchment. The Mangaheka catchment is subject to existing drainage and flood constraints, which have informed the stormwater management approach adopted for the Project. The Te Rapa catchment drains north toward the Waikato River and is managed in accordance with the Te Rapa North Integrated Catchment Management Plan.

For stormwater management purposes, the Project has been divided into eight on-site stormwater catchments. These catchments generally align with the proposed subdivision stages, although some stormwater catchments service more than one stage. The stormwater catchments are shown in Figure 13, and the relationship between the stormwater catchments and subdivision stages is summarised in Table 3.2.

Figure 13: Stormwater catchments³¹

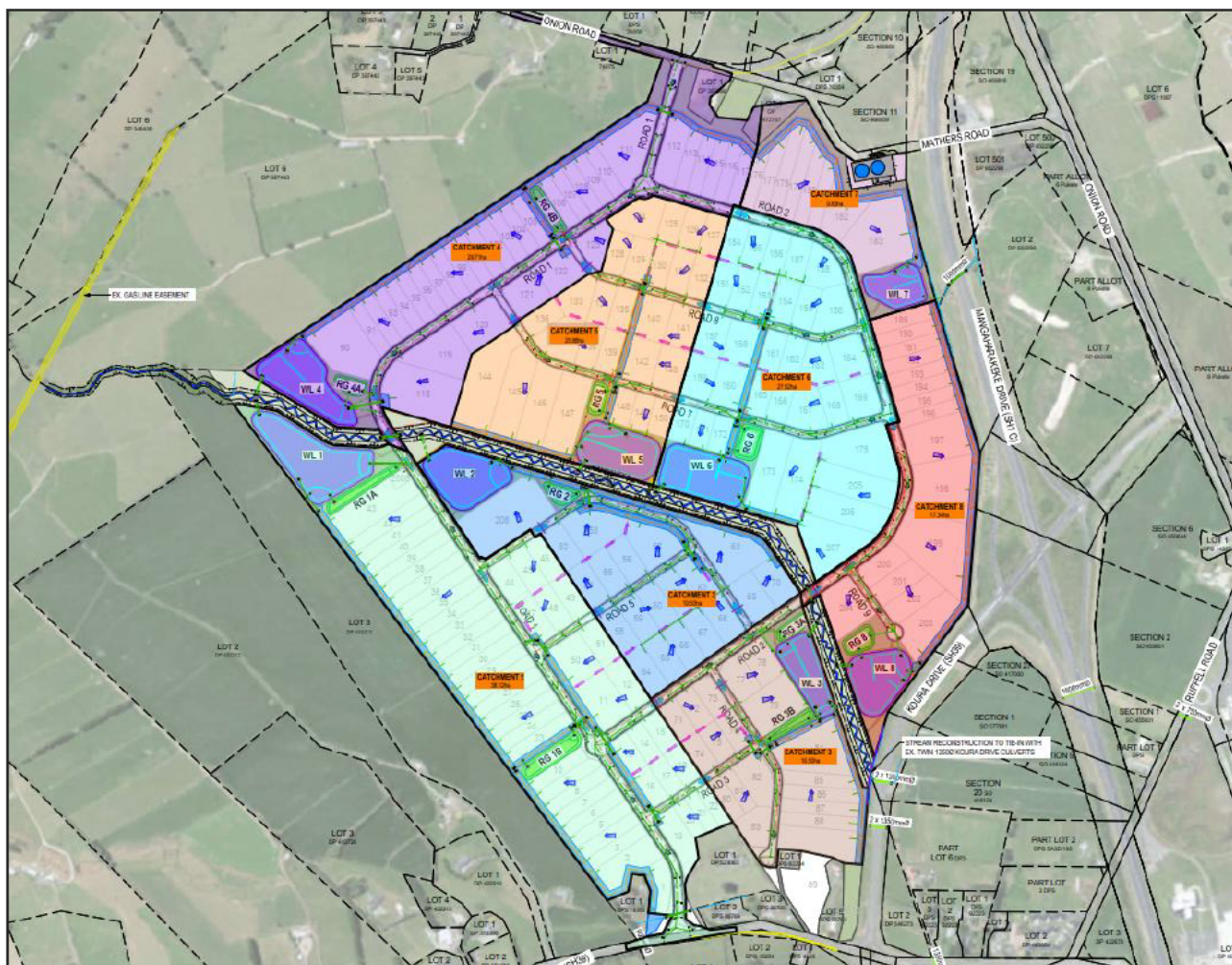


Table No. 3.2 Alignment between stormwater catchments and subdivision stages

SW Catchment	Subdivision Stage
Catchment 1	Stage 1 Stage 2
Catchment 2	Stage 3
Catchment 3	Stage 4
Catchment 4	Stage 5

³¹ Maven Associates, Te Kowhai East Civil Infrastructure Report (28 August 2026, Revision A) – Appendix B, Drawing C400-0 Rev A



Catchment 5	Stage 6
Catchment 6	Stage 7 Part of Stage 8 Part of Stage 9
Catchment 7	Part of Stage 8 Stage R
Catchment 8	Stage 9

Stormwater from the eight on-site catchments will be collected, treated and conveyed through a series of stormwater management devices before discharging via the relevant wetland and outfall structure. Catchments 1-6 and 8 discharge to the Mangaheka Stream system, while Catchment 7 discharges to a modified stream in the Te Rapa catchment. Accordingly, seven outfalls are proposed to the Mangaheka Stream system and one to the Te Rapa Stream catchment.

Each outfall will be designed to provide a controlled, non-erosive transition to the receiving watercourse, incorporating appropriate energy dissipation and erosion protection measures such as riprap aprons, channel lining and armouring where required. The outfall locations shown on the engineering plans (**Volume B – Appendix O**) are indicative only. Final outfall locations, dimensions, configurations and erosion protection measures will be confirmed through detailed design, having regard to the final hydraulic conditions and receiving environment at each discharge point.

Stormwater infrastructure will be delivered progressively alongside the relevant subdivision stages. A summary of the stormwater management network is provided below. Further detail is contained in Civil Infrastructure Report and its supporting Appendices.

Centralised Site-Wide Stormwater Management

Stormwater across TKE will be managed using a treatment train approach, whereby runoff is progressively collected, treated, attenuated and conveyed through a combination of on-lot and centralised public stormwater devices before discharge to the receiving environment (i.e. the Mangaheka catchment or the Te Rapa catchment). The system has been designed so that different components of the network perform complementary functions, including source control, water quality treatment, peak-flow attenuation, flood conveyance and erosion management.

At a site-wide level, the public stormwater system comprises:

- Piped stormwater reticulation and catchpits, primarily within the road network, to collect and convey runoff into the wider stormwater system.
- Vegetated conveyance channels and swales, which convey stormwater between development areas and the centralised treatment devices while also providing water quality treatment and forming part of the primary and secondary flow network.
- Raingardens, which provide bioretention of runoff from public road areas, including retention of the initial 10 mm of runoff from the roads' impervious surfaces.
- Eight centralised stormwater wetlands, which provide the final stage of the treatment train and provide water quality treatment, extended detention, storage and attenuation of stormwater before controlled discharge to the receiving environment.
- The Mangaheka Stream corridor, which will be reconstructed and enhanced through widening and localised lowering, formation of a meandering baseflow channel and associated flood-conveyance works to improve its ability to safely convey stormwater and flood flows, while also providing ecological and riparian enhancement. The Mangaheka Stream upgrades extend 400 m downstream beyond the development boundary to ensure the upgrades transition into the existing stream alignment appropriately.
- Associated culverts, outfalls, bridges and erosion-protection structures, which enable the stormwater and stream network to pass beneath roads and other infrastructure, safely discharge



into receiving environments, mitigate the risk of erosion, reduce the velocity of stormwater and maintain fish passage where required.

Collectively, these measures provide both stormwater quality and quantity management. For water quality, the treatment train is designed to treat one-third of the 2-year ARI, 24-hour rainfall event, with industrial runoff receiving source treatment before passing through the public conveyance and wetland system, as described in the 'On-lot Stormwater Management' section below. For stormwater quantity, the centralised system attenuates post-development peak flows so that discharge rates for the 2-, 10- and 100-year ARI events are no greater than the corresponding pre-development peak flows.

While full neutrality of post-development runoff volumes cannot be achieved through the centralised system, site-specific hydraulic modelling has been undertaken to assess the resulting effects on the receiving environment and inform the additional management measures required. This is outlined further in the 'Residual Stormwater Volume' section below.

On-lot Stormwater Management

The centralised stormwater system will be supported by stormwater measures implemented on each industrial lot as it is developed. The Stormwater Management Toolbox³² (Toolbox) provides the framework for on-lot stormwater management and identifies both minimum requirements and additional measures that may be implemented depending on the characteristics and proposed use of each lot.

At a minimum, future industrial development will be required to provide appropriate source control and pre-treatment, together with rainwater storage for non-potable reuse equivalent to approximately 100 m³ per 1 ha of lot area, representing the initial 10 mm of runoff. Additional detention will be required where the proposed impervious coverage of a lot exceeds the assumptions adopted in the site-wide stormwater design.

The Toolbox also provides for additional on-lot measures, including greater levels of rainwater harvesting and reuse, soakage where ground and groundwater conditions are suitable, and reduced impervious coverage. This provides flexibility for future industrial occupiers to adopt stormwater measures suited to their particular activities, including greater levels of water reuse where there is sufficient non-potable water demand.

The specific on-lot stormwater requirements applying to each industrial lot will be identified through the Site Suitability Report prepared for the relevant subdivision stage. That report will consider the proposed lot configuration, centralised stormwater infrastructure, ground and groundwater conditions, and the on-lot measures available through the Toolbox. The resulting requirements will be secured through consent notices registered against the relevant titles at the time of subdivision.

Residual Stormwater Volume

As the development is unable to achieve stormwater volume neutrality across the Site, the Project proposes an adaptive management approach to managing residual stormwater volumes.

The approach combines minimum on-lot retention and reuse requirements with additional opportunities for soakage, increased rainwater reuse, reduced impervious coverage and additional retention within public stormwater devices where practicable.

For each subdivision stage, and associated detailed engineering design, it is proposed to prepare a Site Suitability Report which will assess the stormwater retention, soakage and reuse proposed within that stage and quantify the residual stormwater volume remaining after those measures have been taken into account.

³² As set out in Section 12 of the Stormwater Management Plan (Volume B – Appendix O).



The on-lot measures subsequently implemented as individual industrial lots are developed will also be tracked, allowing the residual volume to be progressively updated to reflect the actual stormwater volume management achieved across the development.

Where a residual stormwater volume remains after the available retention, soakage and reuse measures have been implemented, this will form the basis for determining any further mitigation required under the adaptive management framework, including any proportionate financial contribution toward agreed downstream watercourse works.

The draft consent condition framework to manage residual stormwater volume effects is demonstrated in Volume B.

Flooding and Overland Flow Management

The Site is subject to flooding under existing conditions due to its low-gradient topography, shallow drainage network and relationship with the Mangaheka Stream.

Flood management is integrated into the earthworks, stormwater and subdivision design. Development platforms will be formed above relevant flood levels, with floodwater conveyed away from future buildings through the Mangaheka Stream corridor, public roads, stormwater reserves, open conveyance channels and protected overland flow paths. Where overland flow paths cross or are located within private lots, they will be protected through drainage easements established as part of the subdivision.

Hydraulic modelling undertaken by Te Miro Water³³ indicates that the proposed attenuation and flood-management measures appropriately manage post-development peak flows and flood levels, with the Project not resulting in a material worsening of downstream flood hazard.

Flood-management infrastructure will be progressively delivered with each subdivision stage, with detailed design and modelling confirming that the required flood-management outcomes are maintained.

3.2.4 Utilities

Power and telecommunications networks will be provided throughout the development in coordination with the relevant network utility providers. Services will generally be located underground within the road reserve service berms and extended progressively with each subdivision stage, with connections provided to individual development lots. Detailed locations of transformers, cabinets, ducts and lot connections will be confirmed through the Engineering Plan Approval process and coordinated with other underground services, vehicle crossings, street lighting, landscaping and streetscape elements.

Correspondence has been received from WEL Networks and Tuatahi First Fibre confirming the availability of electricity and telecommunications servicing for the development, subject to the relevant network provider requirements and connection processes³⁴.

The detailed design and delivery of these services will be coordinated with the relevant network providers as each stage progresses.

3.3 Roding and Transportation

The Project includes construction of a new public road and multimodal transport network across the Site, connecting to the existing transport network at Te Kowhai Road / SH39 to the south and Onion Road to the

³³ Volume B – Appendix P

³⁴ Refer Appendix G of the Civil Infrastructure Report (Volume B – Appendix O).

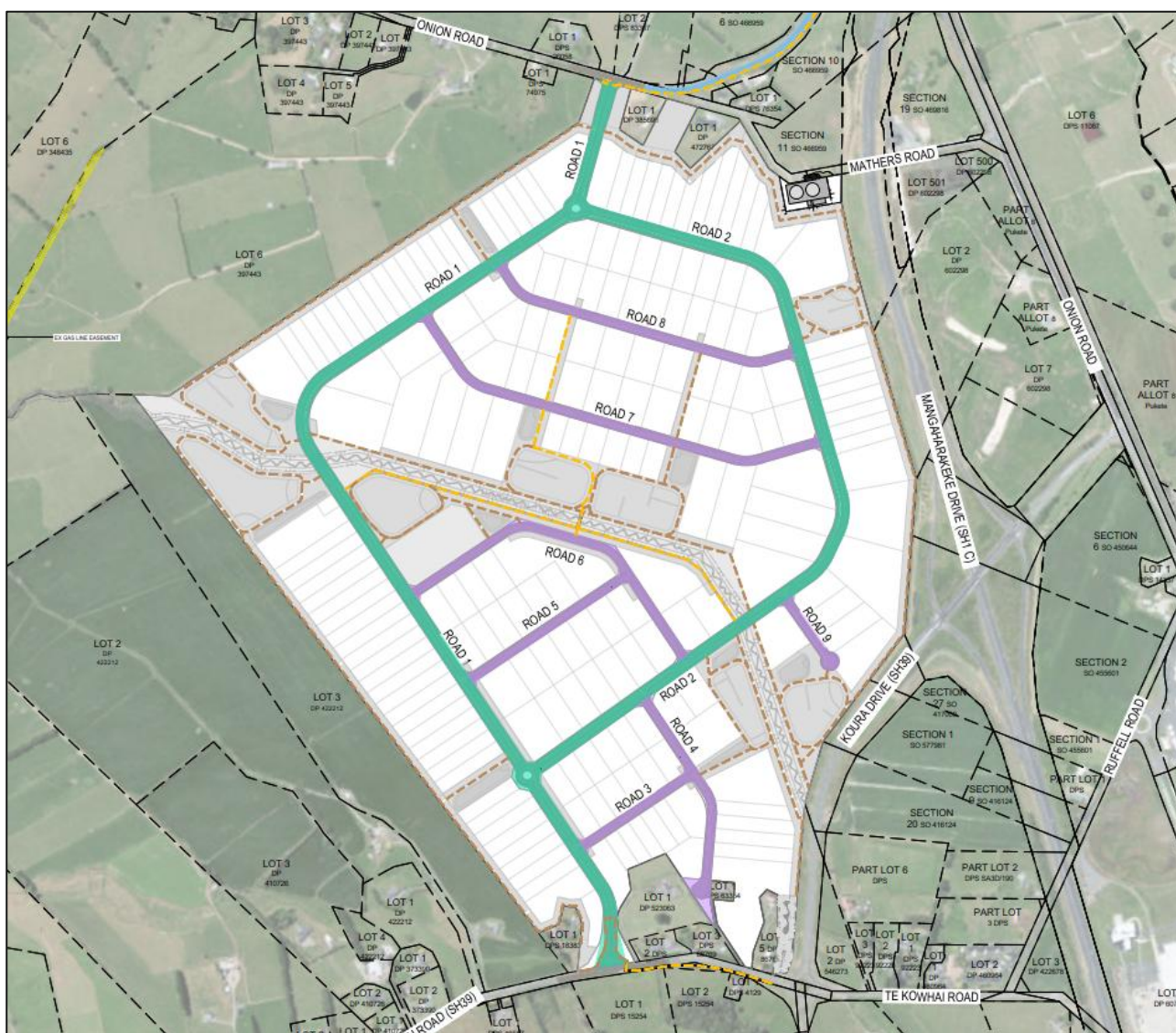


north. The internal network comprises a primary industrial collector loop supported by local industrial roads, together with walking and cycling facilities and provision for future public transport infrastructure. The roads will be constructed progressively as the subdivision progresses and roads are vested.

The road network is shown at a high level on the Road Hierarchy plan in **Figure 14** below. The hierarchy is made up of:

- Green: Collector Road
- Purple: Local Road
- Orange dashed line: Public Recreational Shared Path
- Brown dashed line: Maintenance Tracks
- Blue shading (on Onion Road): Onion Road Urbanisation works

Figure 14: Road hierarchy plan³⁵



³⁵ Maven Associates, *Te Kowhai East Civil Infrastructure Report (28 August 2026, Revision A) – Appendix B, Drawing C300 Rev A*

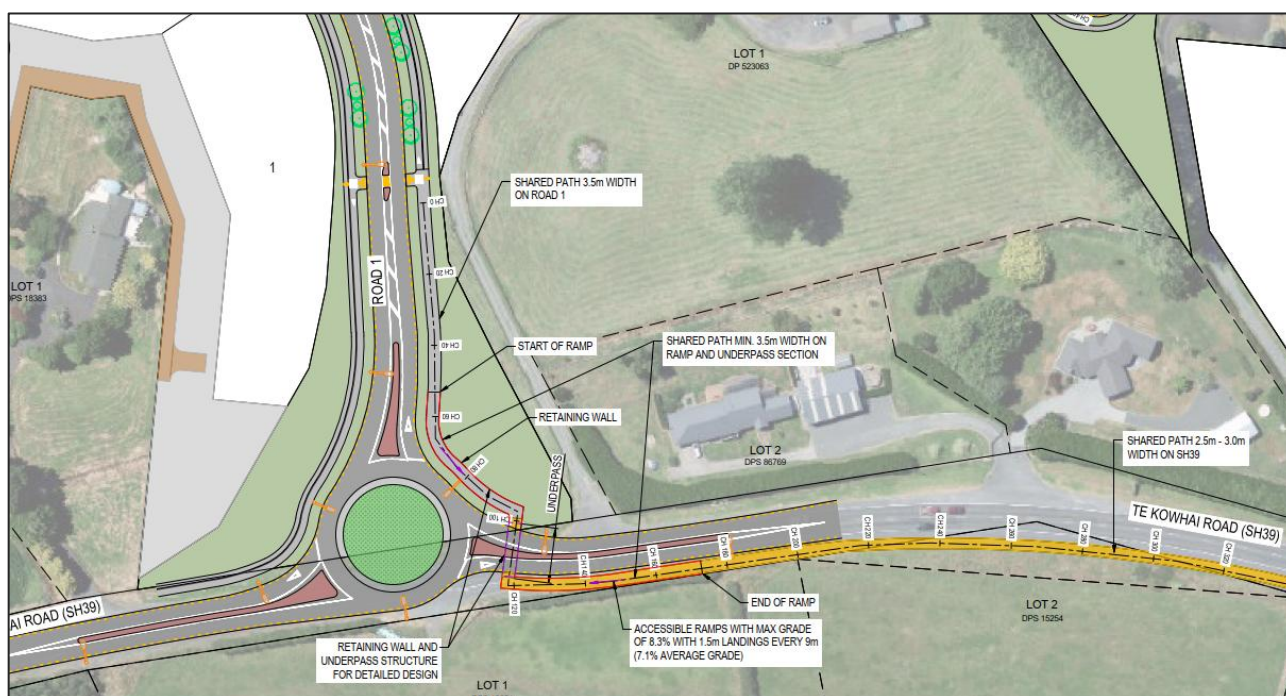


Connections to existing road network

The internal collector road will connect to the existing transport network at two locations, providing a primary southern connection to Te Kowhai Road / SH39 and a secondary northern connection to Onion Road. The intersection layouts are shown in **Figures 15 and 16** below.

The primary southern access will be provided via a new roundabout on SH39 (refer to **Figure 15** below), connecting directly to the internal collector road. Associated works will include walking and cycling improvements along SH39, including a shared path and a grade-separated pedestrian and cycle crossing to connect the Site with the wider active-mode network. The grade-separated pedestrian and cycle crossing is shown as an underpass in **Figure 15** below, however an overpass concept is also included in the civil engineering plans in **Volume B – Appendix O**.

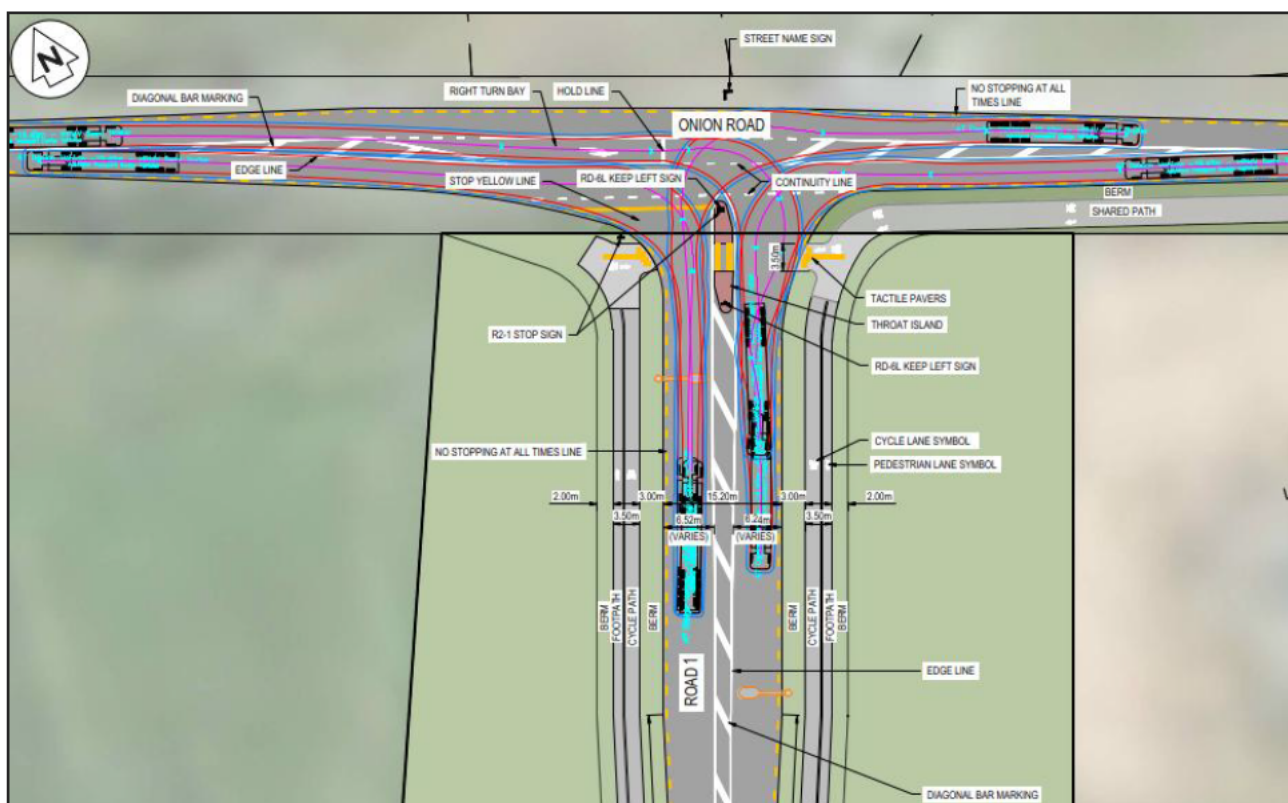
Figure 15: External roading intersection on SH39³⁶



³⁶ Maven Associates, *Te Kowhai East Civil Infrastructure Report (28 August 2026, Revision A) – Appendix B, Drawing C345-2 Rev A*



Figure 16: External roading intersection on Onion Road³⁷



The northern connection to Onion Road (Figure 15 above) is proposed as a priority-controlled intersection. Associated works will include upgrades to Onion Road between the Site and Holmes Road, including kerb and channel, a 3 m shared path, improvements to the Onion Road / Holmes Road intersection and extension of the active-mode connection toward Kohia Drive.

Together, the two connections will provide access to the Site from both the southern and northern transport networks and allow the collector road to operate as a continuous route through the development.

Internal road network

The internal road network comprises two principal road types. The indicative cross sections are shown in Figures 17 and 18, and the following table (Table 3.3) summarises the purpose of each road type. It is noted that the cross sections are indicative only and may be subject to change at the time of detailed design.

Table No. 3.3 Road types and purpose

Road type	Proposed function and indicative detail
Collector	Purpose: Primary movement route through the Site and connection between SH39 and Onion Road. Indicative cross section: 28m road reserve; 11m trafficable width comprising two 4.5m lanes and a 2m flush median; 1.5m footpaths and 2m separated cycle paths on both sides; and indented parking bays where practicable
Local	Purpose: Provides direct access to individual industrial development lots. Indicative cross section: 20m road reserve; 9m carriageway comprising two 4.5m lanes; 1.5m footpaths on both sides; parking within the traffic lane; and cyclists sharing the carriageway.

³⁷ Maven Associates, *Te Kowhai East Civil Infrastructure Report (28 August 2026, Revision A)* – Appendix B, Drawing C380-4 Rev A



Figure 17: Indicative Collector Road Typical Cross-sections (with and without parking bays)³⁸

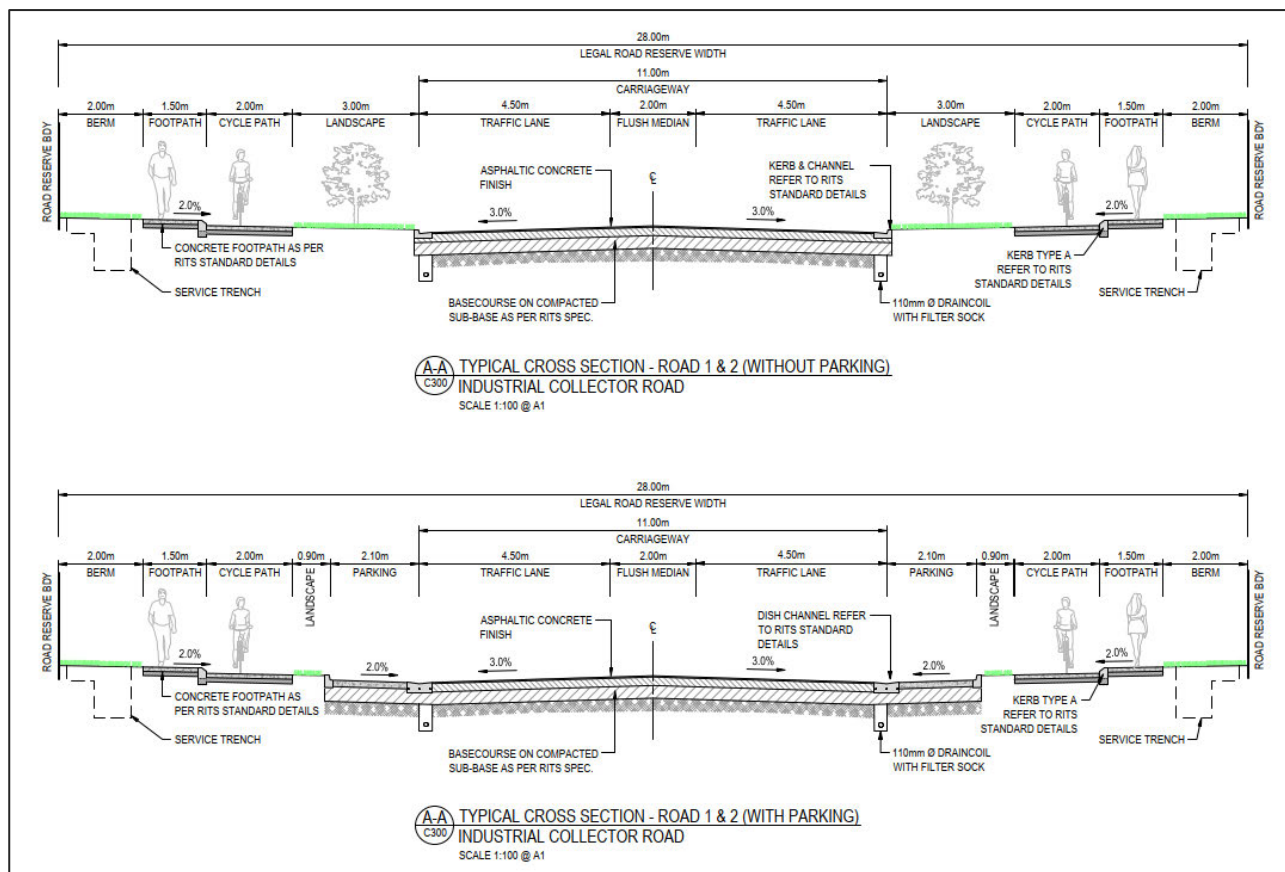
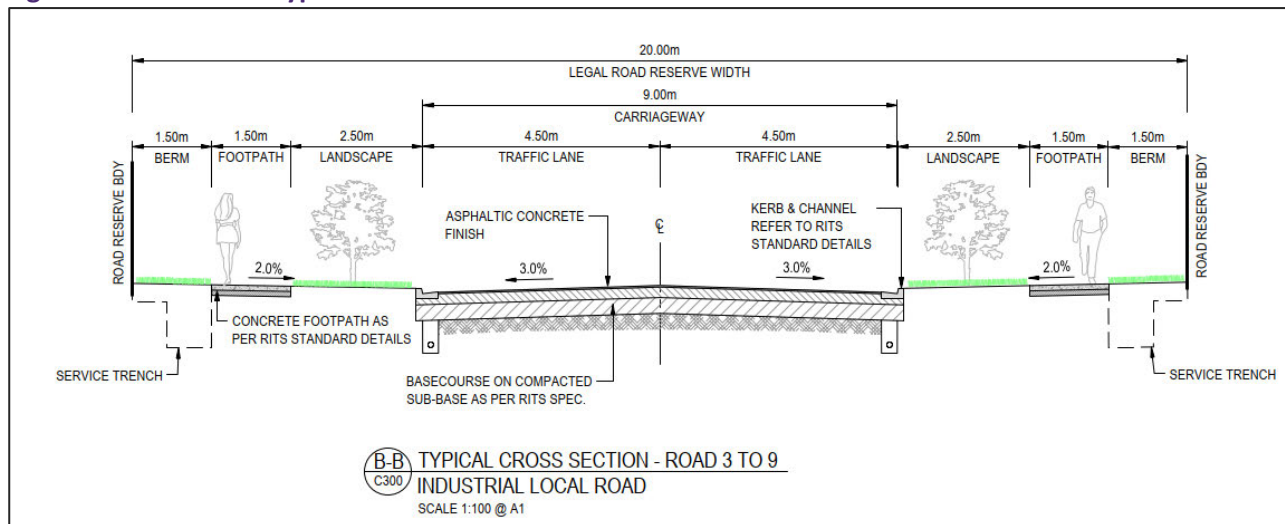


Figure 18: Local Road Typical Cross-sections³⁹



As shown in **Figure 14** above, the primary collector-collector intersections within the Site are proposed as roundabouts, with collector-local and local-local road connections generally formed as priority-controlled T-intersections.

³⁸ Maven Associates, *Te Kowhai East Civil Infrastructure Report (28 August 2026, Revision A) – Appendix B, Drawing C340-1 Rev A*

³⁹ Maven Associates, *Te Kowhai East Civil Infrastructure Report (28 August 2026, Revision A) – Appendix B, Drawing C340-2 Rev A*



Walking and cycling infrastructure is integrated throughout the internal road network. The collector road will provide separate off-road footpaths and cycle paths on both sides, while local roads will provide footpaths on both sides, with cyclists sharing the lower-volume carriageway. Pedestrian refuge facilities will be provided at key collector road intersections and other appropriate locations along the collector road to support safe movement between the pedestrian and cycle routes across the Site.

Additional off-road pedestrian and cycle connections will extend through the wider development, integrated with and located adjacent to the respective stormwater and stream lots/corridors. A dedicated pedestrian and cycle bridge across the Mangaheka Stream is also proposed to improve connectivity between different parts of the Site. The internal network will connect with the new external shared-path facilities along SH39 and Onion Road, providing links to the wider walking and cycling network.

Provision for Public Transport

Based on early engagement with WRC, it is understood that no bus service is presently committed to operate near the TKE site. However, the collector road has been deliberately designed to accommodate buses should a service be introduced in the future. The collector loop could accommodate either a through or loop service, and indicative bus-stop locations have been identified at approximately 800 m spacing.

The road reserve has sufficient space to accommodate future bus-stop infrastructure. As each relevant subdivision stage progresses to detailed design, consultation with WRC will confirm whether bus stops should be installed at that time or provision retained for their future installation.

Property Access

Vehicle crossings shown on the current engineering plans are indicative and demonstrate that the proposed industrial lot arrangement can be appropriately accessed. The final number and location of crossings cannot be fixed until the final property boundaries and future occupier requirements are known.

Vehicle crossing locations will therefore remain indicative until more certainty is available regarding the on-site spatial layout of the proposed lots. Indicative vehicle crossing locations will be demonstrated at the time of detailed design and EPA associated with each subdivision stage, to allow coordination with the final lot configuration, intersection spacing, visibility requirements, street trees, lighting, parking, stormwater devices and other services within the road corridor.

Where it can be confirmed, the crossings shown on the detailed design plans may be constructed in coordination with construction of the road corridor within a stage; however, the consent conditions provide for flexibility of locating and constructing vehicle crossings up until building consent stage to provide for specific on lot built form and operational requirements.

Staged Transport Infrastructure and Wider road network upgrades

Transport infrastructure will be delivered progressively as the subdivision is developed. The proposed conditions link key upgrades to subdivision stages and traffic-generation thresholds so that infrastructure is delivered when required to support the scale of development occurring at that time.

The principal transport triggers are:

- **Stage 1 – SH39 access:** prior to section 224(c) certification for Stage 1, the SH39 / TKE roundabout, upgrades along Te Kowhai Road (SH39), including a shared path connecting the development with the existing active-mode network and a grade-separated pedestrian and cycle crossing of SH39 are required to be completed and operational.
- **Onion Road connection:** the secondary site access to Onion Road, together with associated upgrades to Onion Road including the right-turn bay, shared path, kerb and channel and other agreed corridor works between the site access and Holmes Road, is required by the earlier of:



- Section 224(c) certification for Stage 5; or
- The development generating more than 400 peak-hour vehicle movements.
- **Wider network mitigation:** once the development generates more than 400 peak-hour vehicle movements, the identified off-site mitigation must be completed or secured through an approved agreement with the relevant road controlling authority. This includes:
 - A financial contribution toward the Gateway Drive / Great South Road / Horotiu Bridge Road intersection upgrade; and
 - The identified mitigation at the Koura Drive Interchange, currently comprising a northbound off-ramp right-turn restriction.

The off-site mitigation reflects the Project's contribution to future network demand, rather than requiring the Project to deliver the entirety of upgrades that are also driven by wider background growth.

Detailed design of the transport infrastructure will be undertaken in consultation with the relevant road controlling authorities, with the SH39 and Onion Road intersections also subject to the required Safe System Audit process.

3.4 Groundwater Drawdown and Groundwater Management

Shallow groundwater occurs across much of the low-lying parts of the Site and will interact with several components of the proposed development. A hydrogeological assessment has therefore been undertaken by WGA, including groundwater investigations, monitoring and modelling to characterise the existing groundwater system and assess the temporary and long-term groundwater effects associated with the Project (refer to **Volume B – Appendix Q**).

The principal activities with the potential to affect groundwater are the excavation and construction of stormwater devices, upgrades to the Mangaheka Stream, wastewater infrastructure and creation of black mudfish habitat. Temporary construction dewatering will be required where excavations extend below the groundwater table, while the completed stormwater wetlands, swales and deepened Mangaheka Stream will result in localised long-term groundwater interception and drawdown.

3.4.1 Temporary construction dewatering

Temporary dewatering will be required where construction excavations extend below the prevailing groundwater level. This principally applies to:

- Excavation of the eight stormwater wetlands, stormwater swales, raingardens and pipelines;
- Installation of sections of the wastewater pipeline;
- Construction of the wastewater pump station; and
- Construction of the black mudfish habitat.

The wastewater pipelines are expected to be installed progressively in sections of up to approximately 80 m, with each open trench section completed over approximately 10 days, with localised dewatering undertaken as necessary to maintain a workable excavation. The pump station wet well will require a deeper, targeted dewatering operation, while the stormwater devices will require temporary dewatering during excavation before transitioning to their permanent operating levels.

WGA has assessed the likely groundwater inflows associated with these activities and proposes an overall maximum construction dewatering rate of 7,564 m³/day, allowing for the potential concurrent dewatering of the wastewater pump station wet well, two wastewater pipeline sections, a raingarden and a stormwater wetland. Groundwater removed during construction will be managed through the Site's erosion and sediment-control system and, where practicable, returned to the receiving drainage network upstream of



the works. This will maintain continuity of surface-water flows and minimise short-term stream depletion effects.

3.4.2 Long-term groundwater interception and diversion

Following construction, the stormwater wetlands, swales and deepened Mangaheka Stream will locally intersect the shallow groundwater system and operate as permanent hydraulic features. Groundwater will therefore be passively intercepted and redirected through these features rather than actively pumped.

The black mudfish habitat will also be formed to interact with shallow groundwater, with final excavation levels informed by ongoing groundwater monitoring. The habitat itself is not expected to result in a permanent groundwater diversion.

The long-term groundwater interception associated with the Project represents a redistribution of groundwater discharge within the Site catchments rather than a net loss of groundwater from the system. WGA concludes that the resulting drawdown effects will be localised and will not adversely affect nearby groundwater bores, natural wetlands, the Kahikatea Significant Natural Area or connected surface-water bodies.

3.4.3 Dust suppression water

Water will also be required during construction for dust suppression associated with earthworks and haul roads. The Earthworks Management Plan provides for water carts and temporary storage tanks.

Where available, groundwater abstracted during construction dewatering may be retained and reused for dust suppression, reducing the need for a separate water source. WGA has allowed for up to 1,000 m³/day for this purpose during peak summer conditions.

3.4.4 Monitoring and Management

Groundwater management will be supported by the existing site piezometer network and further monitoring through detailed design and construction. Monitoring will be used to confirm groundwater levels and seasonal variability, refine the design of the stormwater infrastructure and black mudfish habitat, and identify any need for additional groundwater or settlement controls in sensitive locations.

Where required, groundwater and settlement monitoring will also provide a basis for adapting dewatering rates or construction methods if groundwater behaviour differs materially from that anticipated.

3.5 Landscaping

The proposed landscape approach is illustrated in the Concept Landscape Plans contained in **Volume B – Appendix J**. The landscape strategy forms an integrated part of the masterplan and responds to the Site's transition from a rural to industrial environment, including its interfaces with adjoining rural land. Opportunities have also been maximised to integrate landscape planting with other key Site features and infrastructure, particularly stormwater management areas and the Mangaheka Stream corridor.

The landscape design provides for:

- Planted stormwater swales around the Site boundary, providing a dual-purpose landscape buffer;
- Riparian and ecological planting along the Mangaheka Stream corridor;
- Planting associated with wetlands, swales, raingardens and other stormwater infrastructure;
- Street trees and streetscape planting throughout the internal road network;



- Landscape treatment of pedestrian and cycle connections and the principal Te Kowhai Road and Onion Road entrances; and
- Opportunities for cultural expression and tangata whenua input through detailed landscape design.

Landscaping requirements also extend into individual industrial lots as they are developed. The Development Framework requires landscaped road frontages incorporating groundcovers, shrubs and trees, together with screening of outdoor storage areas and other visually prominent service equipment. Drainage and stormwater management measures may also be incorporated into on-lot landscaping where appropriate. These requirements will help establish a consistent landscaped streetscape as individual industrial sites are progressively developed.

Detailed planting layouts, species, sizes, densities and establishment requirements for the public landscape areas will be confirmed through detailed landscape design required by the proposed conditions.

3.6 Earthworks and Streamworks Methodology

The Project requires substantial earthworks to establish the industrial development platforms, internal road network, stormwater infrastructure, stream corridor works and other supporting infrastructure. An Earthworks Management Plan (EWMP)⁴⁰ and Stream Works Management Plan (STMP)⁴¹ have been prepared to set out the proposed indicative staging and construction methodology for these works, supported by the Construction Management Plan (CMP)⁴² and the relevant technical assessments.

3.6.1 Earthworks Methodology

Earthworks will extend across approximately 185.9 ha of the Site and will principally comprise:

- Stripping and management of topsoil;
- Bulk cut and fill to establish industrial development platforms and road subgrades;
- Excavation of the stormwater wetlands, raingardens and conveyance channels;
- Earthworks associated with modification of the Mangaheka Stream and installation of the Te Otamanui Stream culvert;
- Construction of the Onion Road access embankment and northern retaining structures; and
- Associated infrastructure excavations and utility works.

Retaining structures are also proposed along parts of the northern extent of the Site where the existing rolling hill landform is to be cut down to establish the proposed development levels. The current concept design provides for retaining walls of up to approximately 6 m in height, with the final wall type, extent and detailed design to be confirmed through the geotechnical and engineering design process. These retaining structures form part of the earthworks and infrastructure authorised by this Application. Refer to Drawings C240 and C245 in Volume B – Appendix O (Appendix B) for location and cross sections of the retaining structures.

The current earthworks model identifies approximately 1.15 million m³ of structural cut and 1.00 million m³ of structural fill. When allowance is made for the anticipated change in volume through excavation and compaction, the structural earthworks are intended to be substantially balanced within the Site. Approximately 558,000 m³ of topsoil will also be stripped and managed separately, with a portion reused for landscaping and reinstatement and surplus material removed or otherwise beneficially used off-site.

An earthworks methodology has been developed to a level appropriate for consenting and demonstrates a practicable approach to the staging and delivery of the works. The final construction sequence and detailed

⁴⁰ Vol B. Appendix O (Appendix D – Earthworks Management Plan)

⁴¹ Vol B. Appendix O (Appendix F – Stream Works Management Plan)

⁴² Vol B. Appendix S – Construction Management Plan



methodology will be refined through the detailed design process and contractor planning, having regard to actual ground conditions, construction programming, plant and equipment, material suitability and the staging of associated infrastructure. Any refinements will be undertaken in accordance with the consent conditions, the draft management plans and environmental outcomes established through this Application.

The earthworks are divided into four principal earthworks phases, aligned with the nine subdivision stages, together with three stream-work phases associated with the Mangaheka Stream⁴³. The sequencing has been developed to achieve a cut-to-fill balance within each phase where practicable, enabling material to be hauled directly to areas requiring fill, reducing the need for large structural stockpiles and minimising external import and export of earthworks material. Earthworks volumes will be progressively checked and rebalanced as each phase proceeds to respond to actual ground conditions, material suitability and compaction performance.

Earthworks will generally commence with installation of the required erosion and sediment controls, stabilised construction accesses and haul routes, followed by topsoil stripping and bulk cut-to-fill operations. Stormwater devices, stream works, drainage and other infrastructure will then be progressively constructed, with completed areas stabilised as soon as practicable. Stage-specific erosion and sediment control measures will be established before the relevant work area is opened.

The CMW Geotechnical Investigation Report⁴⁴ and future Earthworks Specification will govern the geotechnical methodology. These documents address matters including material suitability and conditioning, engineered fill placement and compaction, settlement, slope stability, retaining structures and the reuse of site-won material. Earthworks will be supervised and tested by the geotechnical engineer, with an Earthworks Completion Report prepared for completed stages.

3.6.2 Streamworks methodology

Stream works will be undertaken progressively alongside the earthworks programme. The principal works comprise modification of the Mangaheka Stream, installation of the two new box culverts for the collector road crossings, construction of the Te Otamanui Stream culvert, various outfall structures from stormwater wetlands and the progressive closure, diversion or piping of the existing farm-drain network.

The Mangaheka Stream works are divided into three main reaches, comprising approximately 1,100 m, 750 m and 410 m respectively, and include lowering and widening of the existing channel, formation of a meandering baseflow channel and flood-conveyance corridor, construction of associated conveyance channels, road crossing culverts and approximately 400 m of downstream transition works beyond the Site. The stream works are proposed to be sequenced with the earthworks so that the required flood conveyance capacity is established progressively to service the staged development.

In-channel works will generally be undertaken within isolated working reaches. The active stream will be temporarily diverted around the work area, with bunds or other temporary structures used to isolate the working reach. Fish capture and relocation will occur before dewatering (in accordance with the Fish Management Plan⁴⁵ (FMP)), after which the isolated section can be excavated and reconstructed. Following reconstruction and implementation of the relevant enhancement and planting works, flow will then be transferred into the completed and stabilised channel before the next reach proceeds. Continuous stream connectivity and fish passage will be maintained during construction.

The Te Otamanui Stream works are more localised and comprise approximately 65m of in stream works associated with installation of the proposed culvert for the new collector-road connection to SH39. The work

⁴³ Refer to Vol B. Appendix O (Appendix B – Engineering Drawings – Plan C221 – Proposed Earthworks Phasing Plan)

⁴⁴ Vol B. Appendix R

⁴⁵ Vol B. Appendix V



area will similarly be isolated and temporarily diverted during culvert installation, with fish salvage, dewatering and reinstatement undertaken in accordance with the STMP and FMP.

The existing farm drains will be progressively managed and altered as earthworks advance. Depending on their future function, drains will be infilled, piped or diverted into the stormwater network as part of the future stormwater and ecological system. Ecological clearance and fish salvage will be undertaken before works occur within affected drains, including specific black mudfish capture and relocation requirements where identified habitat is affected.

3.6.3 Integrated construction and environmental management

The earthworks and stream works will be undertaken within a broader construction management framework. In particular:

- Erosion and sediment control will be implemented on a stage-by-stage basis, including clean- and dirty-water diversions, sediment retention ponds, silt fencing, stabilised accesses, progressive stabilisation and, where required, chemical treatment.
- Ecological management will include pre-clearance surveys, fish and black mudfish salvage, seasonal restrictions, machinery biosecurity controls and implementation of the FMP, Black Mudfish Habitat Creation Plan⁴⁶ (BMHCP), Bat Management Plan⁴⁷ (BMP) and Lizard Management Plan⁴⁸ (LMP).
- Groundwater and dewatering will be managed in accordance with the hydrogeological assessment, including treatment of pumped water and monitoring where deeper excavations or sensitive locations are involved.
- Contaminated land will be managed in accordance with the contaminated land assessment and site-specific management procedures. Identified contaminated areas will be delineated and managed separately, with unexpected contaminated material isolated and appropriately characterised before reuse or disposal⁴⁹.
- Geotechnical controls will govern excavation, material reuse, fill placement, compaction, settlement monitoring and certification of completed development platforms.

The CMP provides the overarching construction framework, while stage specific CMPs, erosion and sediment control plans and contractor methodologies will translate these requirements into the detailed procedures applying to each work area as construction progresses.

3.7 Construction Management

A draft Construction Management Plan (CMP) has been prepared to provide the overarching framework for construction of the Project. Its role is to bring together the various specialist management requirements applying across the Site and translate them into an integrated construction management framework covering matters such as site establishment, erosion and sediment control, ecological hold points, groundwater and dewatering, contamination, dust, construction traffic, health and safety, cultural engagement, incident response and reporting.

The CMP is intended to be read alongside the more detailed specialist plans. Those plans retain responsibility for the detailed technical methodologies and controls within their respective areas, while the CMP provides the site-wide structure for coordinating and implementing them during construction. Prior to physical works commencing, the appointed contractor will prepare a final CMP for the relevant works area, to operationalise the consent stage framework for construction.

⁴⁶ Vol B. Appendix W

⁴⁷ Vol B. Appendix X

⁴⁸ Vol B. Appendix A

⁴⁹ Refer to the draft Contamination Site Management Plan – Vol B. Appendix T



3.8 Ecological Management and Enhancement

The Project incorporates a coordinated package of ecological management, restoration and habitat enhancement measures across the Site. These measures have been developed through the EclA and associated specialist management plans, including the BMP, LMP, FMP, BMHCP and Mangaheka Stream Enhancement Plan (MSEP). Together, these plans address both the management of construction activities and the establishment of long-term ecological habitat within the completed development. The freshwater and bat management plans are contained in **Volume B – Appendices V to Y**, while the LMP is contained in **Volume C – Appendix A**.

During construction, ecological management will include pre-clearance surveys and hold points, fish and black mudfish salvage and relocation, bat roost protocols, lizard salvage and relocation, seasonal restrictions where required, and biosecurity and watercourse protection measures. These requirements will be integrated with the wider earthworks, stream works and construction management framework so that ecological clearances and habitat requirements are coordinated with the staged delivery of the Project.

A major component of the ecological response is the reconstruction and enhancement of the Mangaheka Stream corridor. The existing modified stream will be reshaped to provide a longer, meandering low-flow channel with greater variation in depth and habitat form, restoring the stream from its currently modified and degraded state to a more naturalised and resilient stream environment. Enhancement measures include pools and runs, coarse woody debris and other instream habitat features, together with extensive indigenous riparian planting. Approximately 84,430 m² of riparian and stormwater reserve planting is proposed along the stream corridor, supported by pest plant and animal control, monitoring and ongoing maintenance. The additional stream length and wider enhancement package are assessed in the EclA as providing an overall net-gain outcome for stream extent and ecological values.

The Project will establish approximately 3,600 m² of purpose-designed replacement habitat for black mudfish as a series of discrete, groundwater influenced wetland areas isolated from the wider stream and drainage network to reduce the risk of pest and other unwanted fish species entering the habitat. The wetlands will incorporate aquatic and riparian planting, woody debris, peat substrate and refuge habitat to provide a range of permanent and seasonally wetted conditions. Black mudfish affected by the progressive modification of existing farm drains will be captured and relocated to the created habitat once it has been established and confirmed as suitable, with ongoing monitoring, maintenance and adaptive management provided thereafter. Black mudfish habitat creation will be implemented early in the construction programme to provide sufficient time for the habitat to establish before any black mudfish are translocated.

Detailed design, implementation, monitoring and maintenance requirements for each component of the ecological response are set out in the EclA and supporting management plans referred to above.

3.9 Consent Durations

The proposed lapse periods and consent durations have been tailored to reflect the nature of each approval and the staged delivery of the Project. The proposed durations are summarised in **Table 3.4** below.

Table No. 3.4

Consent/Approval	Proposed Lapse Period	Proposed Duration
Land use consent – industrial development and associated activities	Standard statutory lapse period	Enduring
Land use consent – contaminated land disturbance (NES-CS)	Standard statutory lapse period	No fixed duration / as applicable to the land use consent



Subdivision Consent	Stage 1: 5 years from commencement of consent. Subsequent stages: extended/incremental lapse periods to enable staged delivery of the subdivision as set out in the consent conditions	Enduring
Regional land use consent – land disturbance and cleanfill placement / earthworks	Standard statutory lapse period	20 years
Water permit – groundwater take for construction dewatering	Standard statutory lapse period	20 years
Water permit – surface water take for construction dewatering	Standard statutory lapse period	20 years
Regional land use consent – installation and use of dewatering wells / wellpoints	Standard statutory lapse period	20 years
Water permit – permanent groundwater and surface water diversion and permanent stream works	Standard statutory lapse period	35 years
Structures – structures in, on, under or over the bed of a river	Standard statutory lapse period	35 years
Discharge permit – stormwater diversion and discharge	Standard statutory lapse period	35 years
Wildlife Approval	N/A	10 years
Freshwater Fisheries dispensation	N/A	No fixed duration

The longer 35-year terms sought for the permanent stream works, permanent groundwater diversions and stormwater diversion and discharge consents reflect the ongoing operation of those permanent components of the development. The 20-year terms sought for the earthworks and construction-related water permits provide sufficient time for the staged construction of the Project, while the extended subdivision lapse framework recognises that the development will be progressively delivered over a longer timeframe.



4. ENGAGEMENT AND CONSULTATION

Consultation and engagement commenced before referral of the Project and has continued as the Project design and technical assessments have been developed for the substantive application.

This section summarises engagement undertaken with relevant local authorities, iwi authorities, hapū, Treaty settlement entities, administering agencies, key infrastructure stakeholders and adjacent landowners. It also addresses the consultation-related information requirements applicable to the approvals sought under the FTAA, including the affected-person requirements in clauses 6 and 12 of Schedule 5.

A more detailed record of consultation and engagement undertaken for the Project, including the principal engagement events, correspondence and responses received, is provided in **Volume A – Appendix F**.

Engagement has been iterative. Matters raised through consultation have been progressively considered through further technical investigations, workshops, modelling, revised design information and development of proposed conditions. The engagement has therefore informed the development of the Project and the technical assessments supporting this substantive application.

4.1 Engagement history and context

Engagement in relation to the future development of the Site has occurred over several years. Since 2021, the Applicant and its related interests have participated in strategic planning processes and direct engagement with relevant local authorities and infrastructure agencies regarding the potential urbanisation and development of the land.

This engagement has occurred in the context of wider investigations into growth pressures and future urban development in north-west Hamilton, including through the Hamilton Urban Growth Strategy, Future Proof Strategy, Waikato District Plan review and Hamilton City Council Emerging Areas process.

NZTA confirmed through the referral process that the Site has been included in these wider discussions since 2021, with the nature of future land use and transport matters identified as requiring further investigation. HCC has similarly confirmed the longstanding nature of the engagement. In its comments on the referral application, HCC recorded that TKE had been actively engaging with HCC, WDC and WRC for more than two years regarding its development aspirations for the area. HCC also noted that it had been investigating the potential urbanisation of the Site with the Applicant and the Future Proof partners.

The form of development proposed for the Site has evolved through this period. Earlier engagement considered the broader potential for urbanisation of the land for residential development, while subsequent work has refined the proposal contained in this substantive application.

The referral process therefore formed part of a longer period of engagement rather than the commencement of consultation on the Project. Feedback received through that process, together with the earlier engagement described above, informed the further technical investigations, design development and engagement undertaken for the substantive application. That more detailed engagement is described in the following sections.

4.2 Relevant local authorities and key stakeholders

Following referral, the relevant local authorities and key infrastructure stakeholders established a Fast Track Action Team (FTAT) to provide a coordinated forum for engagement on the Project and support preparation of the substantive application.



The FTAT has included representatives from:

- Waikato District Council (WDC);
- Hamilton City Council (HCC);
- Waikato Regional Council (WRC);
- IAWAI – Flowing Waters Limited (IAWAI); and
- NZ Transport Agency Waka Kotahi (NZTA).

HCC has been recognised throughout the engagement process as a relevant local authority under the FTAA. The referral decision also specifically identifies HCC and NZTA as persons from whom the Panel must invite comments under section 27(3)(b)(iii) of the FTAA, in addition to those otherwise specified in section 53. Both organisations will therefore have a formal opportunity to review and comment on the substantive application as part of the Panel process.

A structured programme of multi-agency workshops commenced in September 2025. These workshops addressed stormwater, transport, ecology, land use and urban design, parks and open space, water and wastewater servicing, infrastructure ownership and traffic modelling.

Engagement has also occurred through separate technical meetings, correspondence, review of draft technical material and follow-up discussions on particular matters. From July 2026, regular Project Control Group meetings were established with key parties to focus on outstanding technical information, servicing arrangements, the Development Framework and proposed consent conditions prior to lodgement.

The principal matters considered through this engagement included:

- Land use, subdivision and urban design outcomes;
- The form and content of the Development Framework;
- Water and wastewater servicing, including interim and ultimate servicing arrangements, network capacity, staging, ownership and funding;
- Stormwater management, downstream flooding and erosion, the Mangaheka Stream, water quality, treatment, vesting and long-term operation and maintenance;
- Ecological effects, including freshwater habitat, black mudfish, mitigation and restoration;
- Transport modelling, access to SH39 and Onion Road, effects on the wider strategic transport network, active-mode connections and future network upgrades;
- The form of proposed consent conditions; and
- The Private Development Agreement (PDA).

Following completion of the principal pre-lodgement engagement programme, WDC, HCC and WRC provided written responses recording their engagement with the Project. WDC and HCC both confirmed in-principle support for the substantive application, subject to the effects of the Project being appropriately addressed. WRC acknowledged the constructive engagement undertaken and the substantial progress made through the pre-lodgement process, while identifying a number of matters for continued consideration through the substantive process. The letters are included in **Appendix F**.

A detailed record of this engagement is provided in **Appendix F**.

4.3 Customary marine title and protected customary rights groups

The Project is not within the common marine and coastal area, and there are no relevant customary marine title groups, protected customary rights groups or MACA mandate applicants relevant to the Project. The Project is also not within, adjacent to, or likely to directly affect ngā rohe moana o ngā hapū o Ngāti Porou.



4.4 Relevant iwi authorities and hapū

The Cultural Impact Assessment (CIA) (**Volume A – Appendix G**) identifies Ngāti Reko, Ngāti Māhanga, Ngāti Wairere and Ngāti Tamainupō as having cultural significance and mana whenua interests in the Te Kowhai East area. Ngāti Hauā and Ngāti Korokī Kahukura are also identified as having recognised whakapapa connections and customary interests. Te Whakakitenga o Waikato also has a wider collective governance and representative role across the Waikato-Tainui confederation.

The section 18 report also identifies Te Whakakitenga o Waikato and Ngāti Hauā Iwi Trust as relevant iwi authorities and Te Whakakitenga o Waikato, Waikato Raupatu River Trust, Waikato River Authority and Ngāti Hauā Iwi Trust as relevant Treaty settlement entities for the Project.

Formal tāngata whenua consultation and engagement has been undertaken through the Tangata Whenua Working Group (TWWG). The TWWG comprises mandated representatives from Ngāti Māhanga, Ngāti Hauā, Ngāti Tamainupō, Ngāti Wairere, Ngāti Reko (Waikeri Marae), Te Uri o Māhanga and Waikato-Tainui. Engagement has occurred over a number of years and has included project briefings and hui, a site visit, provision and review of technical information, and discussion of cultural values, environmental matters and partnership opportunities.

The matters discussed through the TWWG have included:

- The Mangaheka Stream and freshwater values;
- Stormwater, wastewater and water supply;
- Ecological effects, restoration and biodiversity;
- Earthworks and cultural heritage;
- Landscape, open space and cultural expression;
- The water take consent and Te Ture Whaimana;
- Transport and infrastructure;
- Highly productive land; and
- Opportunities for ongoing partnership and involvement in the Project.

A site visit was undertaken on 10 November 2025. The CIA was developed through the engagement process, including discussion of the draft CIA on 26 June 2026. The final CIA was confirmed and approved in August 2026. The CIA identifies recommendations relating to ongoing partnership and engagement, cultural heritage, three waters, earthworks, biodiversity and ecological restoration, cultural landscape, climate resilience, and social and economic outcomes. The CIA also records that mana whenua supports the Te Kowhai East development, including the activities required to enable it, subject to the establishment of an MOU / Kawenata, appropriate consent conditions and implementation of the recommendations contained in the CIA.

Waikato-Tainui has participated through the TWWG and was also separately engaged through a project update hui on 27 June 2025 concerning the masterplan, three waters infrastructure and water supply options. Waikato-Tainui staff were also engaged in relation to Te Ture Whaimana and water-take matters.

4.5 Mana Whakahono ā Rohe and ngā rohe moana o ngā hapū o Ngāti Porou

There is no Mana Whakahono ā Rohe identified as applying specifically to the Site. The wider Waikato River settlement framework provides for joint management arrangements between Waikato-Tainui and relevant local authorities. Those arrangements, to the extent relevant to the Project and the exercise of statutory functions by the relevant councils, are addressed in **Volume B – Appendix C**.

There is also no tangata whenua of any area within the Project extent that is a taiāpure-local fishery, a mātaimai reserve, or an area subject to bylaws or regulations made under Part 9 of the Fisheries Act 1996.



The Project is not within, adjacent to, or likely to directly affect ngā rohe moana o ngā hapū o Ngāti Porou and does not require approval for a land exchange. There are no relevant provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019.

4.6 Relevant administering agencies

The relevant administering agency for the Project is the Department of Conservation (DOC) in relation to the Wildlife Act 1953 and Freshwater Fisheries Regulations 1983 approvals sought as part of the substantive application. Engagement with DOC has focused on the ecological matters relevant to those approvals and has included technical meetings and provision of draft technical material and consent conditions for review and feedback. A detailed record of this engagement, along with correspondence received from DOC is provided in **Volume A - Appendix F**.

4.7 Other Stakeholders

4.7.1 Network Utility Operators

Engagement has been undertaken with relevant network utility operators to confirm the availability and servicing requirements for electricity and telecommunications infrastructure to support the Project.

Tuatahi First Fibre Limited (TFF) confirmed on 7 November 2025 that a telecommunications connection can be made available to each site within the development, subject to the Applicant entering into a TFF Installation Agreement. TFF has confirmed that it would own, operate and maintain the telecommunications reticulation serving the development.

WEL Networks confirmed on 2 April 2026 that electrical reticulation can be supplied to the Project. Existing available capacity is approximately 9 MVA, which is expected to service approximately 70–75 ha of development depending on individual customer load requirements. Further development would be supplied from the planned new Exelby zone substation, currently anticipated by 2033, or potentially earlier if required as development progresses.

The relevant correspondence from these providers is included in the Civil Infrastructure Report (**Volume B – Appendix O**).

4.8 Directly adjacent landowners

Engagement has been undertaken with landowners adjoining the Project and with a wider group of nearby landowners during the preparation of the substantive application.

The level of engagement has reflected the relationship of each property to the Project. General information letters were provided to nearby landowners, while more detailed engagement occurred with landowners directly adjoining the Site or located near proposed works and access points.

The more detailed discussions have addressed matters including:

- Boundary treatment and landscaping;
- Stream works and access for investigations;
- Acoustic controls;
- The proposed SH39 access; and
- The proposed Onion Road connection.



Where agreement has been reached, written approvals and, where required, separate stream works agreements have been obtained. These include approvals relating to the Project generally and, for some adjoining properties, specific agreement to proposed boundary treatments, stream works and operational noise controls.

The engagement has resulted in written approval being obtained from a number of directly adjoining landowners, with engagement continuing with the remaining landowners where agreement has not yet been finalised.

A detailed record of landowner engagement, including the matters discussed and the status of written approvals and associated agreements, is provided in **Volume A - Appendix F**.

4.9 Engagement and consultation summary

Consultation and engagement undertaken during development of the Project has identified a number of recurring themes across the relevant local authorities, administering agencies, tangata whenua, infrastructure providers and adjoining landowners. These matters have informed the development and refinement of the Project design, technical assessments, management plans and proposed conditions.

Table 4.1 summarises the key themes arising from that engagement and the manner in which they have been addressed through development of the Project.



Table No. 4.1 Summary of key themes from engagement

Theme	Details	How feedback has been addressed
Water and wastewater servicing	HCC, WDC and IAWAI sought clarity on the long-term water and wastewater servicing strategy, network capacity, staging, infrastructure ownership and funding, and the relationship between interim and ultimate servicing solutions. Engagement also focused on identifying the development capacity available within the existing network, the infrastructure upgrades required as development progresses, and the timing of reservoir and trunk infrastructure.	The servicing strategy has been progressively refined through technical workshops and modelling. The Northern Interceptor has been identified as the preferred long-term wastewater solution, with interim servicing arrangements provided for until that connection is available. Water servicing options, demand, network capacity and staging requirements have also been further assessed.
Water take and water efficiency	WRC, HCC and tangata whenua have engaged on the proposed Waikato River water take, allocation, use of existing HCC infrastructure, water efficiency and rainwater harvesting, monitoring and metering, future transfer of the consent, and the relationship between the water take and longer-term reticulated water supply.	A separate water-take consent process has progressed alongside the Project. Water demand, rainwater harvesting, monitoring and servicing options have been considered through that process and through the wider infrastructure engagement, including the relationship between the water take, interim servicing and the longer-term reticulated network.
Stormwater management and downstream effects	WRC, HCC and WDC raised matters relating to stormwater treatment and attenuation, increased runoff volumes and peak flows, downstream flooding and erosion, flood-level increases, effects on the Mangaheka Stream and downstream channel stability, groundwater levels, conveyance channels and the long-term operation and maintenance of the stormwater system.	The stormwater strategy incorporates site-wide treatment and attenuation, eight stormwater wetlands, Mangaheka Stream works, downstream hydraulic modelling and an adaptive framework for managing residual runoff-volume effects.
Infrastructure ownership, staging and implementation	HCC, WDC and IAWAI have raised matters relating to infrastructure ownership and vesting, development staging, servicing breakpoints, funding, commercial agreements and the triggers linking development to delivery of external and internal infrastructure.	These matters have been progressively addressed through the servicing work, technical workshops, Development Framework, proposed staging provisions and consent conditions. Water modelling has assisted in identifying servicing breakpoints and future infrastructure triggers, while commercial and PDA arrangements are being progressed separately.
Geotechnical suitability and detailed design	Council and its peer reviewer sought further information on settlement, liquefaction, lateral spreading, groundwater conditions, earthworks, batter stability, stream realignment and the geotechnical feasibility of proposed infrastructure. A recurring issue was distinguishing matters relevant to	The GIR has been expanded and refined to address the identified ground conditions and their implications for development. The GIR confirms that the Site is suitable for the proposed development, subject to the identified geotechnical recommendations. Settlement, liquefaction, lateral-spread,



	establishing suitability for development from matters appropriately addressed through detailed design.	slope-stability and infrastructure-specific matters are addressed through established mitigation measures and detailed design.
Groundwater and interaction with earthworks and waterways	Feedback sought greater clarity on shallow groundwater, dewatering, the effects of earthworks and drainage on groundwater levels, and the interaction between groundwater, the reconstructed Mangaheka Stream, stormwater infrastructure and proposed ecological mitigation areas.	The hydrogeological assessment and related technical reports have been developed to better define groundwater conditions and potential effects. The relevant findings have been incorporated into the geotechnical, stormwater and ecological assessments and the proposed detailed-design and monitoring requirements.
Transport modelling and network effects	HCC, WDC and NZTA raised matters relating to trip generation and distribution, development staging, WRTM assumptions, future network infrastructure, effects on SH39 and the Koura Drive Interchange, the Northern River Crossing and the timing of network upgrades. The modelling scope also considered sensitivity testing for different land-use and network scenarios, including large-format/wholesale retail and SH39 four-laning.	The ITA and supporting WRTM modelling have been progressively refined through engagement with the road controlling authorities. The modelling brief was agreed around defined staging, land-use assumptions, forecast years and network sensitivities, including testing with and without the Northern River Crossing, SH39 four-laning and large-format/wholesale retail scenarios. The modelling has been used to distinguish Project-related network effects from wider existing and future network constraints.
Site access and active-mode connections	Engagement addressed the form and location of the SH39 access, the Onion Road connection, walking and cycling connections, public transport provision and integration with the surrounding network.	The Project provides for primary access via a new SH39/Te Kowhai Road roundabout, a secondary Onion Road connection and walking and cycling improvements. The SH39 roundabout and shared-path connection have been developed through engagement with NZTA and the Councils.
Development framework, staging and land-use controls	HCC and WDC sought greater clarity on subdivision and development staging, the relationship between the masterplan and Development Framework, the location and extent of different activity areas, and the controls applying to industrial and non-industrial activities. Engagement also considered how infrastructure and servicing triggers should relate to development stages.	The Development Framework and masterplan have been progressively refined through workshops with HCC and WDC. This has included refinement of the spatial overlays, activity framework, definitions and staging provisions, together with alignment between the Development Framework and proposed consent conditions.
Urban design, landscape and site interfaces	Feedback addressed the extent and function of landscape and stormwater buffers, native planting, riparian treatment, road and edge cross-sections, amenity areas, rural interfaces and the long-term ownership and maintenance of these areas.	These matters have informed refinement of the masterplan, landscape strategy and Development Framework, including the green-blue network, riparian planting, road and edge treatments and interfaces with adjoining land.



Non-industrial activities and neighbourhood centre	HCC and WDC raised concerns about the range, scale and location of non-industrial activities proposed within the development and the need to maintain the primary industrial function of TKE. Detailed discussions addressed the neighbourhood centre, offices, childcare, retail, trade supplies, yard-based retail, data centres and large-format/wholesale retail.	The activity framework has been progressively refined in response to this feedback, including changes to the location, scale and definitions of non-industrial activities and the use of defined precincts or overlays. The Development Framework retains the primary industrial focus of the Project while providing for a more limited range of supporting non-industrial activities in identified locations.
Freshwater ecology and black mudfish habitat	WRC, HCC and DOC raised detailed matters relating to freshwater ecological values, the extent and quality of black mudfish habitat, survey methodology, habitat-loss calculations, the design and hydrology of replacement habitat, predator exclusion and the basis for proposed enhancement measures.	The EclA and Black Mudfish Habitat Creation Plan have been progressively refined, including further explanation of habitat values, survey information, habitat creation calculations and design rationale. The Project provides for purpose-built black mudfish habitat, together with monitoring and management measures.
Mangaheka Stream reconstruction and ecological enhancement	Feedback addressed the design and ecological function of the reconstructed Mangaheka Stream, stream habitat, riparian restoration, fish passage, monitoring and the need for measurable and enduring ecological outcomes.	The stream design and Mangaheka Stream Enhancement Plan have been further developed to incorporate naturalised channel form, riparian planting and habitat enhancement. Monitoring and management requirements have also been refined through the technical review process.
Terrestrial ecology, bats and lizards	HCC, WRC and DOC raised matters relating to indigenous vegetation, lizard habitat and salvage, bat management, restoration planting, pest and weed management, predator control and the long-term maintenance of ecological mitigation areas.	The EclA and associated management plans have been refined in response to this feedback, including the LMP, BMP and restoration and pest-management provisions. DOC's feedback has informed the LMP and Wildlife Approval material, including the proposed salvage, relocation and release-site requirements.
Freshwater fisheries and fish passage	DOC raised matters relating to temporary damming and diversion, fish passage, fish salvage and relocation, pest-fish management, the scope of the Complex Freshwater Fisheries approval and the information required for relevant structures.	The freshwater fisheries approval material, FMP and proposed conditions have continued to be developed in response to DOC's feedback. The Project's approach is to maintain fish passage during staged works and through the reconstructed Mangaheka Stream.
Contaminated land and soil management	WDC and WRC sought further information on identified HAIL activities, contaminant pathways, management of contaminated soils during bulk earthworks, asbestos, acid	The PSI/DSI and site-management provisions have been refined to better identify HAIL areas and contaminant pathways and to provide for management of contaminated or unexpected material during earthworks. Relevant controls are also



	sulphate soils and the relationship between contaminated land, groundwater and surface water.	incorporated into the proposed management and consent framework.
Earthworks staging and construction management	WDC sought greater site-specific detail on earthworks staging, cut-to-fill balance, stockpiling, material blending, erosion and sediment control, construction access and the potential need to import or export material.	The Earthworks Management Plan and Construction Management Plan have been developed to more clearly describe the staged earthworks approach, material management, erosion and sediment controls and the framework for stage-specific construction planning.
Construction traffic	Feedback sought greater clarity on construction traffic volumes, haul routes, access points, effects on public roads and pavement condition, safety and the relationship between earthworks staging and material movements.	The Construction Management Plan includes a Construction Traffic Management Plan framework addressing haul routes, access and public-road controls, with more detailed construction traffic management to be confirmed prior to relevant works.
Tangata whenua values and cultural outcomes	Engagement through the TWWG has addressed freshwater and stormwater management, the Mangaheka Stream, ecological restoration, earthworks, landscape and cultural expression, and opportunities for continued partnership.	Tangata whenua engagement has informed development of the Project and associated technical work. The CIA was developed through the TWWG process and confirmed and approved in August 2026.
Effects on adjoining properties	Adjoining landowner engagement has addressed boundary landscaping and retaining treatments, stream works, acoustic controls, electricity servicing and the relationship of proposed access points to nearby properties.	Property-specific responses have been developed through direct engagement. Written approvals have been obtained from a number of adjoining landowners, including specific agreement on boundary treatment, stream works and operational noise controls, with some engagement continuing.

