

28 November 2025

Future Proof Implementation Committee

Attn: S 9(2)(a)

Via email: S 9(2)(a)

Submission on the Hamilton to Tauranga Corridor Spatial Study – Scenarios and Options Report

Thank you for the opportunity to provide feedback on the Hamilton to Tauranga Corridor Spatial Study (HTC Spatial Study) and, specifically, the Scenarios and Options Report.

This submission is prepared on behalf of interests associated with two Fast-Track Approvals Act 2020 (FTAA) projects located within the Hamilton to Tauranga Corridor: (1) Ashbourne, and (2) Southern Links 1 (SL1). These projects represent regionally significant residential, industrial, and strategic infrastructure opportunities that should materially influence the assumptions used in preparing the scenario testing for this work.

General Comments on the Scenario Approach

The Scenarios and Options Report is intended to provide a clear, evidence-based understanding of how growth may unfold across the Hamilton to Tauranga Corridor under different assumptions. Given the purpose of the Spatial Study to inform future strategic planning, including a Future Development Strategy (FDS), it is essential that the scenarios meaningfully test a range of plausible growth pathways with careful consideration of factors such as committed infrastructure and live development activity. However, in their current form, the scenarios do not demonstrate the level of differentiation, flexibility, or integration required to provide a robust basis for long-term spatial planning.

Across the four scenarios, there appears to be very little variation in the projected distribution and scale of residential and industrial growth. The modelling outputs presented in Figures 4.10 and 4.12 show near-identical outputs for the number of dwellings and industrial land demand regardless of the scenario type, which limits the usefulness of the modelling for understanding different growth pathways. The scenario framework does not appear to meaningfully test alternative futures and undermines the use of scenarios as a strategic planning tool.

The scenarios also do not sufficiently stress-test or explore the potential range of plausible growth outcomes. A more robust scenario suite would explore greater variability, including high-growth, low-growth, infrastructure-led scenarios and market-driven alternatives as well as pathways that respond to external shocks or step changes, to better reflect the uncertainty and dynamism of growth across the Hamilton to Tauranga Corridor. The absence of this wider variability means the outputs present only a narrow view of how the corridor may evolve, which limits their ability to inform a fit-for-purpose FDS.

A further limitation is that the current modelling does not factor in development enabled through other processes such as the Fast-Track Approvals Act (FTAA). The scale of development likely to occur through

FTAA projects is substantial and should materially influence growth assumptions and spatial outcomes. This is discussed further in the section below.

We agree that constraints mapping is a critical and necessary component of spatial scenario development and testing. However, the current “no-go” and “go-carefully” spatial layers appear to be mapped at a very coarse grain. At this scale, they are not sufficiently legible to support robust spatial analysis or informed decision-making. The broad-brush mapping approach results in exclusions that lack nuance, particularly in areas where the on-the-ground context, zoning status, national direction pathways (e.g. NPS-HPL) or infrastructure settings may in fact enable development opportunities that the mapping does not capture. Greater clarity is needed on how these constraint layers have been used to inform the scenarios put forward, including how they have been balanced against the practical realities of needing to provide for growth across the corridor. In addition, a more rounded approach is required that not only maps constraints but also explicitly identifies opportunities, recognising locations where infrastructure investment, live zoning, or FTAA enabled development may support strategic and well-sequenced growth.

Alignment and Integration with FTAA and Future Regulatory Settings

A key concern and omission is that the Scenarios and Options Report does not explain or consider how FTAA projects whether listed, referred, or with substantive applications pending have been incorporated into the scenario development process. Section 4.5 (“Hamilton Options”) provides no indication of how these projects have been accounted for, despite their scale, statutory weight, and relevance to likely growth outcomes. Given the number of FTAA projects already within the corridor, their omission limits the accuracy of the growth assumptions and spatial distributions being tested.

There is also no discussion on how imminent future RMA reform or changes to national direction may influence growth patterns, capacity, or development feasibility over the life of the study. The reforms are likely to have material effects on planning frameworks, infrastructure funding, zoning, and development pathways. Without acknowledging or testing these potential influences, the scenarios risk becoming outdated or disconnected from the future regulatory environment they are intended to inform.

The methodology used to identify “no-go” and “go-carefully” areas does not align with the mechanisms or intent of the Fast-Track Approvals Act which is actively facilitating growth and development. The FTAA enables development in locations that may otherwise be constrained under existing planning frameworks, particularly where projects are regionally significant or support critical infrastructure. Applying a constraints only approach to these areas overlooks the statutory pathways that are actively facilitating development notwithstanding those constraints, and may lead to misinterpretation of their actual development potential.

One example of this disconnect is the designation of the entire Peacocke Structure Plan as a “no-go/go-carefully” area. Peacocke is a major, live-zoned growth area in Hamilton with significant infrastructure investment already committed and underway. Categorising this strategic growth node as unsuitable for development undermines both its statutory status and the practical reality of its role in meeting Hamilton’s long-term residential supply obligations.

More broadly, the scenarios lack integration with the rapidly evolving FTAA project pipeline across the Waikato and Bay of Plenty. A substantial number of FTAA projects are in progress, many involving large-scale

residential, industrial, and infrastructure components that will materially influence the availability of serviced land, regional housing and industrial capacity, and the sequencing of key infrastructure. These outcomes will also directly shape transport planning, including major connections such as the Roads of National Significance. Excluding these projects results in scenarios that do not accurately reflect real development drivers.

To support credible, future-focused spatial planning, the Scenarios and Options Report must incorporate metrics associated with the FTAA pipeline, live zoning and development data, and more granular constraints mapping. It also needs to enable scenario pathways that reflect FTAA enabled development, including infrastructure led growth patterns and variable growth trajectories. Only with this integration can the study reliably inform future FDS processes and provide a robust platform for strategic land-use planning across the corridor.

Fast-Track Projects within the Hamilton to Tauranga Corridor

To illustrate the scale and significance of FTAA projects within the Hamilton to Tauranga Corridor, we highlight below two live examples currently progressing through the FTAA process. These projects, Southern Links 1 (SL1) and Ashbourne represent major developments that will materially influence growth patterns, housing supply, industrial land supply, infrastructure and economic activity across the corridor. We consider that their inclusion in scenario modelling is essential to ensure that growth assumptions and spatial planning reflect real, imminent development outcomes rather than just potential projections.

Southern Links 1 (SL1)

The SL1 Growth Cell encompasses approximately 440 hectares of land located on the southern edge of Hamilton, within the Waipa District. This area is positioned at a critical interface between Hamilton's urban boundary and key strategic transport and infrastructure corridors, making it one of the most significant future growth locations within the wider Hamilton to Tauranga Corridor. Within SL1, multiple projects are progressing through the FTAA process. These include the SL1 listed project, which proposes 1,035 residential dwellings and approximately 66 hectares of industrial land, with a substantive FTAA application expected to be lodged in the first quarter of 2026. The Growth Cell also includes the SL1 Rogerson Block, a referred project comprising around 200 residential units and 30 industrial lots. In addition, a forthcoming FTAA referral for the SL1 Houchens area is anticipated to provide approximately 1,700 residential dwellings and 25 hectares of net industrial land.

Collectively, these developments represent more than 250 hectares of residential and industrial expansion within SL1, subject to FTAA approvals. This scale of development is substantial and constitutes a regionally significant growth node capable of materially influencing both short and long-term spatial outcomes for the corridor. The sequencing and delivery of SL1 will be closely tied to the provision of key enabling infrastructure, including the Hamilton Southern Links Road of National Significance, upgrades to the Southern Wastewater Treatment Plant, regional water supply infrastructure, and other essential services. These projects will unlock the development capacity within SL1 and contribute to a coordinated, infrastructure led development pattern. Given the magnitude of this growth potential, it is critical that the Scenarios and Options Report fully integrates the SL1 pipeline. Omitting or underrepresenting SL1 significantly reduces the credibility and robustness of the scenario outputs.

Ashbourne

Ashbourne is a major substantive FTAA project currently lodged for consideration, located in Matamata and comprising approximately 530 residential dwellings, 250 retirement units, areas of commercial development, supporting infrastructure, and two solar farms across roughly 125 hectares. This project represents a comprehensive, master-planned development that will provide a diverse range of housing typologies and retirement living options, alongside commercial activity that will support local employment and services. A decision on the FTAA application is expected before the end of 2025.

The Ashbourne development is intended to be delivered in a staged and sequenced manner, aligning with infrastructure availability, servicing capacity, and market demand. Its scale and mix of activities position it as an important growth node within the Hamilton to Tauranga Corridor, enhancing housing choice, supporting energy resilient infrastructure through the solar farms, and strengthening the economic links between Matamata, Hamilton, and Tauranga. As with SL1, this project sits within a broader pipeline of FTAA developments that will influence regional housing supply, infrastructure planning, transport demands, and economic activity. For this reason, Ashbourne should be accounted for within the scenario modelling. Its omission limits the ability of the scenarios to accurately reflect the current and future development context and weakens the strategic insights intended to inform future FDS processes.

Together, SL1 and Ashbourne provide key examples of the scale, complexity, and strategic importance of FTAA enabled development within the corridor. Not including these types of projects and others in the FTAA pipeline into scenario modelling risks delivering outputs that are disconnected from actual growth, undermining the overall utility of the Scenarios and Options Report as a foundation for future FDS or broader spatial planning.

Summary and Recommendations

To enhance the robustness, usefulness, and defensibility of the Scenarios and Options Report, we recommend:

- (1) Expanding the scenarios to incorporate a broader range of growth variations and stress test alternative development trajectories.
- (2) Integrating FTAA enabled development capacity including Ashbourne, SL1, and other regionally significant projects into all relevant modelling and assumptions.
- (3) Refining “no-go/go-carefully” mapping to provide greater detail and legibility, ensuring constraints are represented at an appropriate scale. In addition, incorporate mapping of development opportunities alongside constraints to present a more balanced and informative spatial picture.
- (4) Providing transparent metrics that demonstrate how FTAA projects, RMA reforms, and infrastructure investment are factored into each scenario.
- (5) Embedding flexibility within the scenario methodology to ensure it remains agile and fit-for-purpose in informing future FDS processes.

We appreciate the opportunity to provide feedback and would welcome the chance to meet and discuss these recommendations further.

Yours sincerely | Nā māua noa, nā

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