**Hon Tama Potaka**

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing

05 AUG 2026

Hon. Chris Bishop
Minister for Infrastructure
infrastructure.portfolio@parliament.govt.nz
Parliament Buildings
Private Bag 18041
WELLINGTON 6160

Tēnā koe Hon Bishop

Thank you for your invitation to comment on the fast-track application for the proposed development at Horsham Downs in Waikato District.

Waikato District is projected to continue experiencing strong population growth and increasing demand for housing, particularly in the northern part of the district. The wider Hamilton-Waikato sub-region is also expected to accommodate significant future growth over coming decades. Development of the scale proposed could contribute to increasing housing supply and supporting future growth in the region.

A range of matters are likely to be raised by local authorities and can be considered if the project proceeds to the detailed assessment stage. These include effects on wetlands and freshwater values, development on highly productive land, the site's relationship to existing growth planning and sequencing arrangements, and geotechnical considerations including peat and acid sulphate soils.

The proposal will also require further consideration of infrastructure and servicing arrangements. Assessment will be needed of water, wastewater and stormwater servicing, strategic transport requirements, impacts on the State Highway 1 corridor, and the integration of the development with wider sub-regional infrastructure planning. Cross-boundary matters, including reliance on infrastructure and services associated with Hamilton City, are also likely to be relevant considerations.

These are significant issues, but they can be addressed by the Expert Panel, including through seeking comment from relevant local authorities and infrastructure providers. Accordingly, I have no objection from the housing portfolio perspective to the project being referred to the next stage.
Thank you again for the opportunity to comment.

Hon Tama Potaka
**Associate Minister of Housing**

**Hon Tama Potaka**

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing

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

Tēnā koe Minister Bishop,

**Invitation to comment on Horsham Downs Estate project under the Fast-track Approvals Act 2024**

Thank you for the invitation to comment on Horsham Downs Estate project under section 17 of the Fast-track Approvals Act 2024.

I have considered the application and its alignment with my portfolios as Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report.

Nāku noa, nā

**Hon Tama Potaka**
Te Minita mō Te Arawhiti me Te Minita Whanaketanga Māori
Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand | +64 4 817 6811 | t.potaka@ministers.govt.nz

**Hon Nicola Willis**

Minister of Finance
Minister for Economic Growth
Minister for Social Investment

27 July 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ- 0036665

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 on the referral applications for Whangapouri Road (FTAA-2606-1247), Drury West Crossing (FTAA-2606-1248), The Rest (FTAA-2606-1249), New Central Park (FTAA-2606-1252), and Horsham Downs Estate (FTAA-2606-1257).

I am providing these comments in my capacity as Minister for Economic Growth. They focus on whether each application is likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided by the applicants. The quantitative estimates below are drawn from economic assessments prepared for the applicants.

***Whangapouri Road, FTAA-2606-1247***

The application is for an integrated residential-led development across approximately 100 hectares near Whangapouri Road and Bycroft Road, north of State Highway 22 in Drury, Auckland. It would provide approximately 1,050 to 1,150 dwellings, comprising 850 to 950 general residential dwellings and 200 retirement village dwellings on an 11.9-hectare site, together with a local centre, open space, and supporting infrastructure.

According to the formal economic assessment prepared for the applicant, total project investment is estimated at approximately $764 million. Over the seven-year development programme, construction and development activity is estimated to contribute approximately $543 million to Auckland's gross domestic product (GDP), comprising $173 million in direct effects and $370 million in indirect effects. It is also estimated to support 3,030 full-time-equivalent (FTE) years of employment, comprising 925 direct and 2,105 indirect FTE-years. The assessment expresses this as equivalent to around 433 FTEs per year over the development programme. The associated employment is estimated to generate approximately $271 million in wages and salaries, comprising $86 million from direct activity and $185 million from indirect activity.

Once complete, the local centre is expected to provide approximately 3,500 square metres of retail and commercial floorspace. At full build-out, it is estimated to support approximately 80

ongoing FTEs, equivalent to employment for around 84 people, and generate more than $8.2 million in annual GDP and approximately $4.9 million in annual wages and salaries.

The wider benefits would be primarily regional. The proposed 1,050 to 1,150 dwellings, including retirement living options, would substantially increase housing capacity in southern Auckland and may improve the market's responsiveness to demand growth. Co-location with a local centre and supporting infrastructure may improve access to existing and planned employment opportunities.

On balance, the proposal appears likely to deliver significant regional economic benefits under section 22(2)(a)(iv) of the Act, given the scale of the proposed investment, construction activity, and housing delivery. It may also be relevant to section 22(2)(a)(iii), as it would increase housing supply and contribute to a well-functioning urban environment.

***Drury West Crossing, FTAA-2606-1248***

The application is for an approximately 123-hectare industrial development between State Highway 1 and Great South Road, adjacent to the Ramarama Interchange in southern Auckland. It would provide a 111.9-hectare light-industrial precinct comprising 91 lots, 66.8 hectares of net developable land, 350,000 square metres of industrial floorspace, and up to 5,000 square metres of supporting commercial floorspace. It would also include internal roads, a green network, public open space, up to six electronic billboards, an interim construction storage yard, and associated transport and utility infrastructure.

According to the economic assessment prepared for the applicant, total project investment is estimated at $1.293 billion, including around $1.035 billion in building construction costs. Over the nine-year development period, construction and development activity is estimated to contribute $923 million to Auckland's regional GDP, comprising $297 million in direct effects and $626 million in indirect effects.

It is also estimated to support 5,135 FTE-years of employment, comprising 1,570 direct and 3,565 indirect FTE-years, and generate approximately $461 million in wages and salaries, comprising $146 million from direct activity and $315 million from indirect activity. This equates to a simple annualised equivalent of approximately 571 FTE-years over the nine-year development period.

At full build-out, the industrial and commercial activities enabled by the proposal are estimated to directly support work for approximately 1,920 people, equivalent to 1,820 ongoing FTEs. They are also estimated to contribute approximately $360 million to Auckland's regional GDP annually and generate around $175 million in annual wages and salaries.

The proposal would increase the supply and range of large-format industrial land in southern Auckland. Its location beside State Highway 1 and the Ramarama Interchange could support warehousing, logistics, construction-related services, and light manufacturing, while improving access to large, well-connected sites. The assessment also identifies potential benefits from greater land-market competition, stronger links between employment and planned residential growth in the wider Drury area, and connections to regional and North Island supply chains.

The benefits would be principally regional, although Auckland's wider freight and supply-chain role may generate national effects.

On the basis of the points above, the proposal appears likely to deliver significant regional economic benefits under section 22(2)(a)(iv) of the Act, primarily through the scale of capital investment, construction and development activity, and ongoing industrial and commercial activity.

***The Rest, FTAA-2606-1249***

The application is for a comprehensively planned mixed-use development across approximately 55 hectares at Tauwhare in the Waikato District. It would provide an agricultural education institute, approximately 36 rural-residential lots, a retirement village with around 125 independent living villas and 30 care suites, a neighbourhood commercial centre, storage and farming and equipment-hire facilities, open space, roading, and three-waters infrastructure.

According to the economic assessment provided by the applicant, total development costs are estimated at $201 million. Over a five-year development period, the proposal is estimated to contribute $122 million to GDP, comprising $33 million in direct effects and $89 million in indirect effects. It is also estimated to generate approximately $71 million in wages and salaries and support approximately 830 FTE-years of employment. The assessment expresses this as 166 FTEs in each year of the assumed development period, comprising 48 direct and 118 indirect FTEs.

Once fully operational, the commercial, care, and agricultural education activities are estimated to support employment for approximately 107 people, equivalent to 88 ongoing FTEs, and generate approximately $10.3 million in annual GDP and $6.2 million in annual wages and salaries. The 88 FTEs comprise 44 in commercial activities, 25 at the care facility, and 19 at the agricultural education institute.

The wider benefits would be primarily regional. The proposal would provide approximately 125 retirement living villas, 30 care suites, and 35 net additional rural-residential dwellings in the Waikato District, increasing accommodation and aged-care capacity where the applicant's assessment identifies an existing supply shortfall. The agricultural education institute may also support regional workforce development and primary-sector skills formation.

On this basis, the proposal may deliver significant regional economic benefits under section 22(2)(a)(iv) of the Act, particularly through construction activity and ongoing employment across its commercial, care, and agricultural education components. It may also be relevant to section 22(2)(a)(iii), as the proposed rural-residential dwellings and retirement living units would increase housing and accommodation choice in the Waikato District.

***New Central Park, FTAA-2606-1252***

The application is for a 28-hectare mixed-use development at 77 and 109 Kāpiti Road, adjacent to the Paraparaumu Town Centre. It would provide 520 to 620 residential units, large-

format and specialty retail activities, commercial space, open space, flood management and wetland restoration areas, transport connections, and associated infrastructure.

According to the economic assessment prepared for the applicant, the project represents approximately $487 million in investment expenditure. Construction activity is estimated to contribute approximately $289.2 million in GDP and support 1,625 FTEs across the construction period. This comprises $147.9 million in direct GDP and 920 direct FTEs, together with $141.3 million in indirect GDP and 705 indirect FTEs generated through supply-chain effects. Within the indirect total, approximately $8.3 million in GDP and five FTEs are attributed to primary industries.

Once operational, the retail and commercial components are estimated to contribute approximately $63.7 million in GDP annually, comprising around $47.2 million from retail activities and $16.5 million from commercial office activities.

The assessment also identifies broader regional benefits, including the delivery of approximately 520 dwellings under the non-retirement village scenario and an increase in identified greenfield housing capacity from approximately 6.2 years to 8.4 years. It suggests the development could improve local retail provision, increase expenditure retention within the district, and support additional commercial activity across the Kāpiti Coast. These benefits would be concentrated within the region, although increased housing supply may support broader economic outcomes through population and labour market growth.

On this basis, the proposal appears likely to deliver significant regional economic benefits under section 22(2)(a)(iv) of the Act through its construction activity, investment expenditure, and ongoing retail and commercial operations. It may also be relevant to section 22(2)(a)(iii), as it would increase housing supply and may contribute to a well-functioning urban environment.

***Horsham Downs Estate, FTAA-2606-1257***

The application is for a 54-hectare master-planned residential development on Gordonton Road, on Hamilton's north-eastern edge. It would provide approximately 850 to 950 residential lots or dwellings across a range of housing typologies, including standalone, duplex, terrace, and potentially live-work development. The proposal also includes a 1,500-square-metre neighbourhood centre, open space, a green-blue network, and associated infrastructure. Private water and wastewater services are proposed if connections to existing networks are unavailable.

According to the economic assessment provided by the applicant, the proposal represents $598.8 million in development expenditure. Construction is estimated to contribute $181.9 million in direct GDP and support 1,148 direct FTE jobs. Including indirect supply-chain effects, the estimated impact increases to $355.6 million in GDP and 2,014 FTE jobs. Within the indirect effects, approximately $10.2 million in GDP and six FTE jobs are attributed to primary industries. Full delivery is expected over eight to nine years. However, the assessment does

not express the employment estimates as FTE-years or provide peak or average annual employment figures, so the FTE estimates cannot be annualised over the development period.

Once complete, annual household expenditure associated with an assumed 900 dwellings is estimated at $45.2 million. This is expected to contribute approximately $25.1 million in GDP annually and support around 250 ongoing FTEs, including activity associated with the neighbourhood centre.

The wider benefits would be primarily regional. The proposal would materially increase Hamilton's greenfield housing capacity, broaden the range of dwelling types and price points, and support competition in the residential land and development market. The assessment estimates that current and pipeline developments provide approximately 8.8 years of greenfield demand, increasing to around 10.0 to 10.2 years with the proposal. Its proximity to major employment areas, including central Hamilton, Te Rapa, and Ruakura, could also support housing choice, labour market access and a better-functioning urban environment across Hamilton and the wider Waikato Region.

The economic costs identified in the assessment are limited. The proposal would displace the site's existing rural use, which is estimated to contribute approximately $0.2 million in GDP and support two FTE-years, and generate temporary construction-related effects such as noise and traffic disruption.

On balance, the proposal appears likely to have significant regional economic benefits under section 22(2)(a)(iv) of the Act, particularly through the scale of construction activity and the addition of housing capacity in the Hamilton market. These benefits appear likely to outweigh the limited economic costs identified. The proposal may also be relevant to section 22(2)(a)(iii), given its contribution to housing supply and a better-functioning urban environment.

Yours sincerely



Hon Nicola Willis
**Minister for Economic Growth**

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

| | |
|---|---|
| Project name | Horsham Downs Estate |

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

## 1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

| | | | |
|---|---|---|---|
| **Organisation name** | Director-General of Conservation<br>Statutory delegations are in place for the Department of Conservation (DOC / the Department) to provide commentary on behalf of the D-G. | | |
| ***First name** | Loren | | |
| ***Last name** | Brown | | |
| **Postal address** | | | |
| ***Contact phone number** | 0273579998 | **Alternative** | |
| ***Email** | Fast-track@doc.govt.nz; | | |

## 2. Please provide your comments on this application

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

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

**Manager's signoff**



**Fast Track Applications Manager** 5 August 2026

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.
Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

# Director-General of Conservation s17 comments

| | |
|---|---|
| **Project name** | Horsham Downs Estate |
| **Applicant name** | Horsham Downs Estate Limited |
| **Application number** | FTAA-2606-1257 |
| **Project summary details** | Urban development on approximately 54 hectares at 319 Gordonton Road, Rototuna in the Waikato District, comprising subdivision and land use consent for appropriately 850-950 lots for residential activities, including some live work units and commercial and/or light industrial use and a neighbourhood centre. The application site although within the Waikato District, is directly adjacent to the boundary of Hamilton City.<br><br>The proposal includes land modification including potential watercourse works, wetland reclamation and off-setting and creation of enabling infrastructure including new roads, alterations to existing roads, water and wastewater supply networks and stormwater management.<br><br>The proposal does not involve any development on Public Conservation Land. |

## 1 Applicant engagement

1.1 As the project includes an approval under a specified Act for which the Director-General of Conservation is the administering agency, the applicant was required to notify DOC and allow 20 working days to respond before lodging the referral application in accordance with section 11.

1.2 In relation to this application, DOC has had the following engagement with the applicant:

1.2.1 DOC was notified of the application on 13 May 2026;

1.2.2 DOC provided the applicant with the pre-lodgement response on 8 June 2026, within the 20 working day timeframe;

1.2.3 the referral application was lodged on 30 June 2026;

1.3 In the period available specific feedback was able to be provided as discussed below.

## 2 Wildlife approval

2.1 The referral application does mention that Wildlife Permits will be sought if required, but does not specify any particular Wildlife Approvals.

2.2 The Applicant states that if lizards are detected on site a lizard management plan will be prepared. The application material also identifies the general area is known for bats and there

are several stands of trees that may be home to bat roosts. The brief ecological assessment highlights that any disturbance to bats will be avoided.

2.3 DOC considers that copper skinks are likely to be present at the site and considers a Wildlife Approval would be appropriate, but the referral application does not specifically identify what approval will be sought for.

2.4 The Applicant does identify the possibility of wetlands, albeit highly modified, and the likelihood of bats and birds on the site but is of the opinion that Wildlife Approvals are not required. DOC does not have enough information at this stage to specifically comment on the Applicant's interpretation regarding the need, or not, for Wildlife Approvals.

## 3 Freshwater Fisheries

3.1 The Applicant specifically states that the referral application will not seek any complex freshwater fisheries approval as, if required, these will be dealt with in a separate process.

3.2 The Applicant also states that given the drains are man-made features, the Freshwater Fisheries Regulations do not apply.

3.3 DOC notes that the Fast-track Approvals Act does not include the same provisions as the Freshwater Fisheries Regulations. For example, under the FTAA, the construction of dams, diversions and reclamations fall within the definition of the complex freshwater fisheries activities and as such require approval.

## 4 Other considerations

4.1 It has been noted above that all relevant approvals may not have been applied for. DOC has provided input to a number of fast-track projects to date where additional conservation approvals that would have been available under the FTAA have not been included in an application. In some of these cases it has been necessary for applicants to seek additional approvals under the specified Acts via normal processing. This can result in inefficiencies, additional costs and undermining of the benefits of the 'one stop shop' approach the FTAA was designed to deliver.

4.2 DOC also noted in its pre-lodgement response that the site lies approximately 1.5 km east of Lake E (Lake Tunawhakaheke), in part of a Government Purpose Wildlife Management Reserve, administered by DOC. Lake E and the surrounding environment are unsuitable for the discharge of urban stormwater or treated wastewater. The information provided at this point by the applicant is not adequately detailed to be certain of the performance of stormwater drainage during high groundwater levels in the winter. DOC requests that prior to lodging its substantive application, the applicant provide a drainage plan demonstrating that Lake E will not receive urban runoff during high groundwater periods or receive treated wastewater.

4.3 DOC recommends the Minister consider whether further information should be sought from the applicant under s20 prior to making the decision to ensure all approvals in scope of the FTAA and necessary to implement the project are included.

## 5 Criteria for Minister's decision on referral application

5.1 Sections 21 and 22 of the FTAA set out matters to be considered by the Minister in determining whether a referral application should be accepted.

5.2 Comments below are targeted to provisions where DOC has specific interests or information relevant to the Minister's decision.

5.3 Criteria for declining a referral application

5.3.1 Section 21 sets out the criteria for the Minister for declining a referral application. DOC has considered these criteria and provides comments in the table below.

| Section | Criteria | Comments |
|---|---|---|
| 21(3)(b) | Does the project involve an ineligible activity | Based on the information available, DOC has considered the ineligibility criteria at sections 5(1)(h), (i), (j) and (k), and has not identified any aspect of the Project that would be ineligible based on those criteria. |
| 21(3)(c) | Is there adequate information to inform a decision | With respect to the approvals identified in the referral application for which DOC is the administering agency, DOC considers the information **adequate** in terms of a referral decision. |
| 21(4) | Are there any other reasons to decline the application? | Based on the information available, DOC has not identified any reason why the referral application should be declined. |
| 21(5)(a) | Is the project inconsistent with:<br>• a Treaty settlement;<br>• Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019;<br>• Marine and Coastal Area (Takutai Moana) Act 2011. | Based on the information available, DOC has not identified any inconsistency with any relevant Treaty settlement or other obligations. The relevant Treaty settlements are:<br>• Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010<br>• Ngāti Hauā Claims Settlement Act 2014 |
| 21(5)(b) | Would it be more appropriate to deal with the proposed approvals under another Act(s) | Based on the information available, DOC has not identified any reason why the Project should not be dealt with under the FTAA. |
| 21(5)(c) | Would the project have significant adverse effects on the environment | Based on the information available, DOC considers it is likely that adverse effects of the Project can be addressed through appropriate conditions on any substantive approvals. |
| 21(5)(d) | Does the applicant(s) have a poor compliance history under a specified Act | DOC has not identified any issues with the applicant's compliance history. |

| Section | Criteria | Comments |
|---|---|---|
| 21(5)(g) | Would a substantive application have any competing applications | Based on the information available, DOC has not identified any competing applications in respect of conservation approvals. |

## 5.4 Criteria for accepting a referral application

5.4.1 Section 22 sets out the criteria for the Minister for accepting a referral application.

5.4.2 DOC has considered these criteria and has not identified anything where DOC has specific interests or information relevant to the Minister's decision.

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

| | |
|---|---|
| **Project name** | Horsham Downs Estate |

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

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

## 1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

| | | | |
|---|---|---|---|
| **Organisation name (if relevant)** | Hamilton City Council | | |
| ***First name** | Dr Juliana | | |
| ***Last name** | Reu Junqueira | | |
| **Postal address** | 260 Anglesea Street, Hamilton (Council Building) | | |
| ***Contact phone number** | 07 245 0013 | **Alternative** | 022 850 2226 |
| ***Email** | Juliana.reujunqueira@hcc.govt.nz | | |

## 2. Please provide your comments on this application

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

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

**Managers signoff**



***Dr Juliana Reu Junqueira*** Date 04/08/2026

Unit Director – Urban and Spatial Planning

Hamilton City Council

Hamilton City Council
Te kaunihera o Kirikiriroa

Private Bag 3010
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**4th August 2026**

**Stephanie Frame**
Manager – Fast-track Operations
contact@fasttrack.govt.nz

**Dear Stephanie,**

**RE: FAST-TRACK PROPOSAL: Horsham Downs Estate - Application Number FTAA-206-1257**

Thank you for the invitation to provide written comments on the Horsham Downs Estate referral application under the Fast-track Approvals Act 2024.

The comments below highlight the risks and dependencies that in our view, should shape both any referral decision and the information requirements for a substantive application.

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

Kind Regards,



Dr Juliana Reu Junqueira
Director - Urban and Spatial Planning Unit
Hamilton City Council
Juliana.reujunqueira@hcc.govt.nz

CC: Blair Bowcott
General Manager – Strategy, Growth & Planning Group
Hamilton City Council
Blair.bowcott@hcc.govt.nz

**Hamilton City Council Comments:**

**Summary**

Hamilton City Council (**HCC**) considers that the proposal raises significant strategic and infrastructure-related concerns, particularly given its apparent inconsistency with existing growth strategies, planned urban form, and infrastructure investment priorities.

The key concern is the lack of infrastructure capacity available to service the site. As this area has not been strategically identified for growth in the Future Proof Strategy 2024 or the Waikato District Plan, the proposal appears inconsistent with section 22 of the Fast-track Approvals Act 2024. The infrastructure upgrades required to support the development have not been planned and remain unfunded.

Hamilton is currently estimated to have more than 11 years of serviced residential land supply available, significantly exceeding the three-year target. This position is strengthened further through the delivery of several major Fast-track developments, including Ruakura 2, Orchard Grove, Brymer Farms, Southern Links Stage 1, and a range of other residential projects. Given this substantial supply pipeline, the key challenge for HCC is ensuring that infrastructure investment can be prioritised, funded, and delivered in an efficient and coordinated manner.

The proposal contains several significant transport gaps. Most notably, the Haynes Place intersection requires further review, particularly given the corridor's High Collective Risk and Medium-High Personal Risk profile. Additionally, given the scale and urban nature of the proposal, rural census-based trip rates may not be appropriate, and Gordonton Road should be upgraded to a full urban minor arterial standard accordingly.

Hamilton's water network currently ends around Borman Road, and HCC Master plans for Water (and Wastewater separately) make no provision for servicing the subject area which sits outside of HCC boundary. The feasibility of servicing the site should be confirmed in consultation with IAWAI – Flowing Waters (IAWAI), noting that any self-supply arrangement would place significant obligations and liabilities on the provider.

HCC would reiterate that there is currently no significant water or wastewater capacity east of the Waikato Expressway, nor is any such capacity planned. Given the out-of-sequence nature of the proposed development, a comprehensive strategy will be required to identify appropriate short- and medium-term infrastructure solutions.

The proposed stormwater strategy raises significant concerns. The current approach appears to rely primarily on detention, with limited provision for volume retention, which may not meet Waikato Regional Council requirements. If unresolved, this could represent a fundamental constraint to the proposal. Additionally, the stormwater memorandum does not clearly define the proposed treatment train.  preferred stormwater treatment toolbox should be identified to demonstrate how stormwater quality and quantity effects will be effectively managed.

HCC emphasises that IAWAI is the relevant authority for water and wastewater servicing matters and technical advisor on stormwater. In relation to three waters, HCC endorses and refers to IAWAI's comments.

**Background**

Horsham Downs Estate is located immediately beyond Hamilton's northern city boundary, within the Waikato District (refer to Figure 1). The surrounding area is predominantly rural in character.

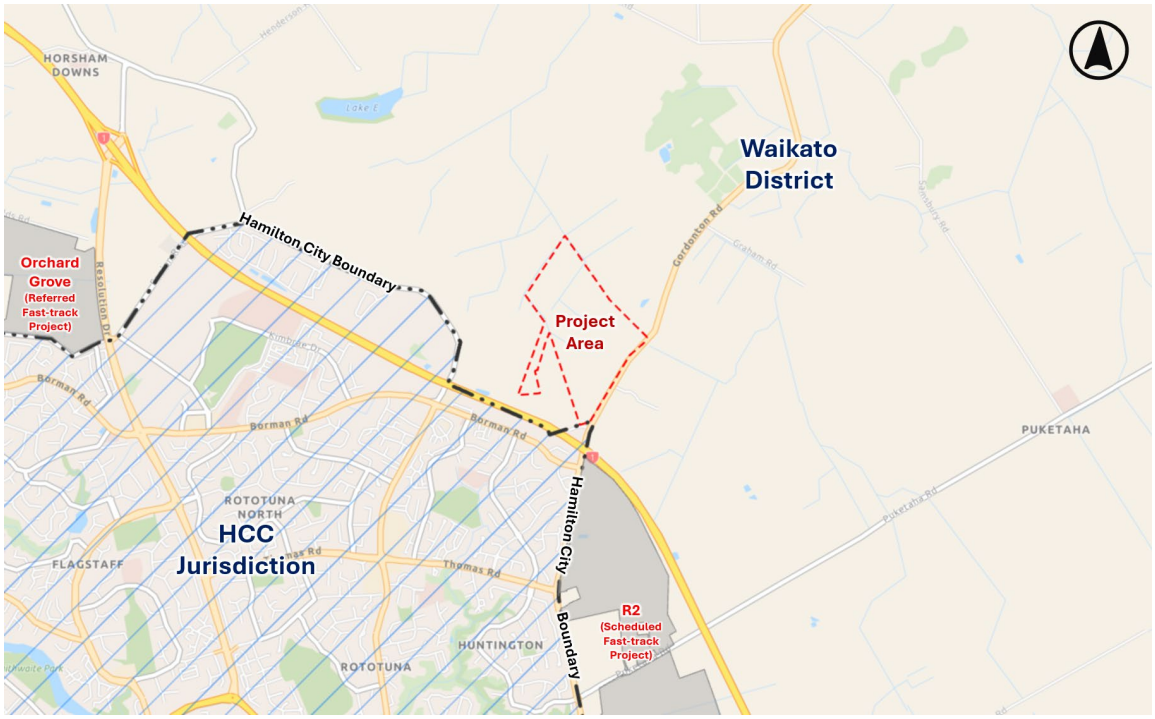



*Figure 1 – Project Locality*

Two significant urban development projects are proposed in the vicinity of Horsham Downs Estate: Orchard Grove and Ruakura 2 (R2) Growth Cell. Orchard Grove was referred on 29 March 2026, while R2 is listed in Schedule 2 of the Fast-track Approvals Act 2024 (**FTAA**). Together, these developments are expected to deliver approximately 2,200 residential lots and 35 hectares of industrial land.

Hamilton's water network currently ends around Borman Road, and HCC's water and wastewater master plans have no provisions for servicing the subject area, which lies outside the HCC boundary. This presents a significant constraint, as the site cannot be serviced in the short- to mid-term. HCC has also indicated that there is no significant existing or planned water or wastewater capacity east of the Waikato Expressway. Given the out-of-sequence nature of the proposed development, a comprehensive strategy setting out short- and medium-term infrastructure solutions will be required.

HCC and its Future Proof partners - Waikato District Council, Waikato Regional Council, and the New Zealand Transport Agency - have been working proactively with Fast-track applicants to investigate potential interim solutions, where available, that may help address these constraints and enable some development to commence. In some instances, these interim solutions may involve sharing available reserve capacity across other Fast-track areas; however, this would accelerate the depletion of that capacity.

**Section 22 Analysis (Scope)**

Under section 22(2)(a)(x) of the FTAA, an application's consistency with relevant local and regional planning documents, including spatial strategies should be considered. While the proposal may contribute to increased housing supply and deliver economic benefits, it appears inconsistent with the Future Proof Strategy 2024 and the Waikato District Plan. The key concern is the absence of the infrastructure required to service the site. As the area has not been strategically identified for growth, the necessary upgrades have not been planned or funded at this stage.

The statements in paragraphs 5.30 to 5.32 of the Application Companion Document (Attachment 1) do not appear to fully reflect HCC's current housing capacity position. HCC's latest internal Key Performance Indicator update estimates that the city has more than 11 years of serviced residential land available, significantly exceeding the three-year target. This indicates that Hamilton has a strong supply of development-ready housing land, a position that will be further strengthened by several forthcoming Fast-track projects, including R2, Orchard Grove, Brymer Farms, Southern Links Stage 1, and several other residential developments.

Building on this, Future Proof advised Minister Bishop in correspondence dated 23 March 2026 that the Waikato region has experienced a significant influx of Fast-track proposals. At the time of writing, Future Proof was aware of 26 applications, 21 of which had either been listed in the legislation or subsequently referred into the Fast-track process. A key implication this situation is that, if approved, these projects would substantially increase the amount of plan-enabled residential and business land within the region—potentially providing well beyond 30 years of growth capacity (and potentially exceeding 50 years of supply). The housing land shortfall identified in the Housing and Business Development Capacity Assessment is now largely eclipsed by the volume of Fast-track proposals being advanced across the region. Consequently, the primary challenge has shifted from enabling sufficient development capacity to managing the infrastructure demands generated by this unprecedented pipeline of growth.

With this context in mind, it is important to recognise that HCC has limited resources and capacity to support further infrastructure upgrades associated with future development projects. In the case of this application, this constraint is compounded by the scale of the existing development pipeline in the surrounding area, including R2 and Orchard Grove, both of which are also being progressed through the FTAA process. As a result, competing demands on infrastructure investment and delivery are increasing, placing greater pressure on HCC's ability to effectively coordinate and sequence growth.

In practical terms, these concurrent developments place increasing pressure on finite infrastructure networks - particularly water supply and wastewater services - which are already operating under capacity constraints. As a result, careful prioritisation, coordination, and sequencing of growth will be essential to ensure infrastructure investment is delivered efficiently and supports well-integrated urban development outcomes.

**Land Use and Urban Design**

Given the predominantly rural character of the surrounding area, the proposed development may give rise to reverse sensitivity effects. Appropriate mitigation measures, including green-space buffer areas, will therefore be required.

As the Urban Design Memorandum does not provide lot dimensions and refers only to approximate lot sizes on page 5, it is not possible to determine whether the proposed design is appropriate. This raises potential concerns regarding access arrangements, infrastructure, street trees, and lighting, as well as whether pedestrians can move safely without conflict from vehicles under the proposed design. An Urban Design Assessment should therefore be submitted with the substantive application to explain the design rationale, including the proposed street and lot layout. Given the site's proximity to Hamilton, the design approach should also have regard to the relevant Hamilton City District Plan provisions.

Due to the scale of the proposal and the site's proximity to the SH1 Waikato Expressway, the development may have implications for the operation of the state highway network. Additional

buffering and controls are therefore likely to be required to manage potential noise effects, including appropriate noise insulation measures.

**Transport**

We note the following issues in relation to transport, categorised in multiple themes:

Waikato Regional Transport Model (WRTM)

WRTM modelling is required to assess wider network effects and identify any necessary mitigation. Key locations for investigation include:

- Borman/Gordonton intersection.
- Thomas/Gordonton intersection.
- Thomas/Hukanui intersection.
- Gordonton/Wairere/Pardoa intersection.
- Increased trip volumes on Borman Road, Gordonton Road, Wairere Drive, Pardoa Avenue, and the Waikato Expressway.

Trip Generation

The proposal may significantly affect Gordonton Road, Haynes Place, and State Highway 1. A full Integrated Traffic Assessment should test staging scenarios with and without planned R2, Eastern Transport Corridor, and Wairere Drive upgrades.

Trip generation assumptions also require further review. The proposed mode share appears optimistic for a fringe location with longer trips to jobs, schools, shops, health services, and other key destinations. Rural census-based trip rates may be unsuitable for this proposal. Additionally, the neighbourhood centre is not sufficiently defined to assess whether it would attract additional local trips.

Layout and Roading Network

The master plan shows two access points onto Gordonton Road, retains the existing Haynes Place give-way T-intersection, and proposes a roundabout north of Haynes Place. However, it does not define the transport hierarchy or show where proposed road widths and treatments would apply.

The Haynes Place intersection should be reviewed to confirm its appropriate form and function. Given the development scale and expected traffic patterns, the existing T-intersection may be unsuitable; a roundabout or revised priority arrangement may be required.

Given the scale and urban nature of the proposal, Gordonton Road should be upgraded from a rural road to a full urban minor arterial. Required upgrades include:

- Two-lane minor arterial standards, including carriageway upgrades, footpaths, lighting, landscaping, stormwater management, and walking and cycling facilities.
- A flush median and safe access for motorists, pedestrians, and cyclists, recognising land use on both sides of Gordonton Road.
- Walking and cycling connections extended beyond Haynes Road to Thomas Road and linked into Hamilton's network.
- Sufficient land to accommodate the required minor arterial corridor width.
- A reduced speed environment, with a 60 km/h limit and clear speed threshold north of the site.
- Off-carriageway facilities to separate vulnerable users from traffic.
- Urbanisation works that are not limited to the development frontage or stopping at Haynes Road or the Waikato Expressway bridge.

Safety

The proposal area has a recent history of serious crashes, particularly at the Haynes Place intersection, which appears inconsistent with the conclusion that no fundamental safety issues exist. Gordonton Road is also identified as having High Collective Risk and Medium-High Personal Risk (refer to Figure 2). A Safe System approach should be applied across the corridor, within the development, and at key intersections such as Borman/Gordonton and Thomas/Gordonton.

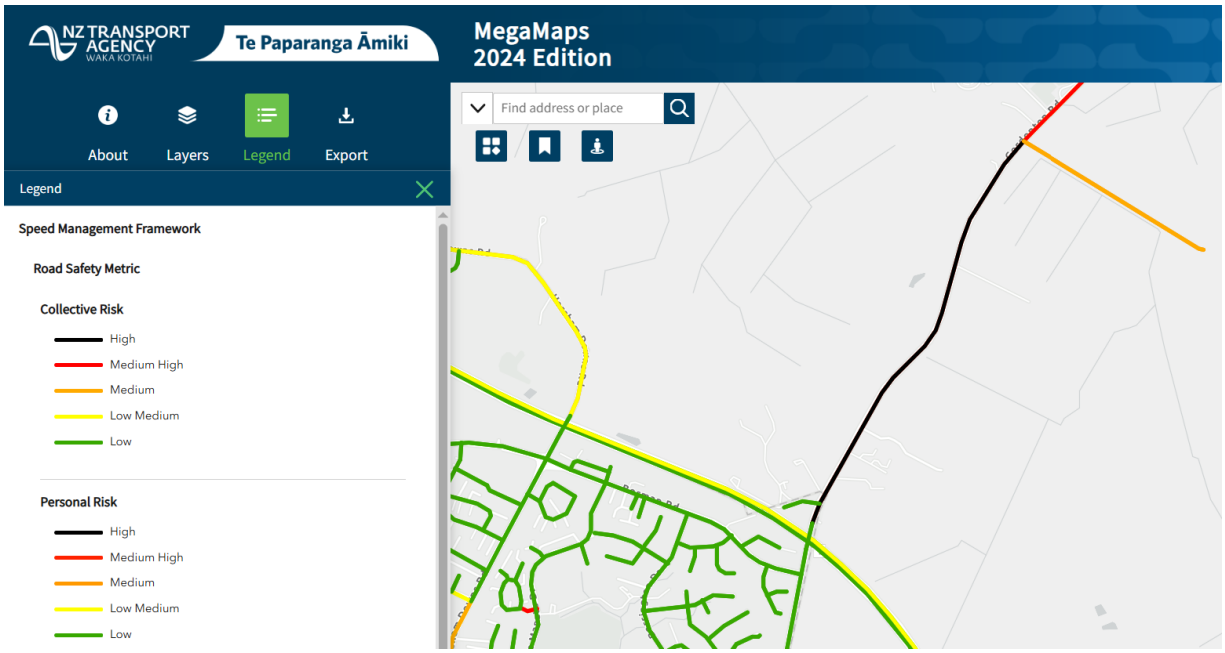



*Figure 2 NZTA MegaMaps 2024*

Public transport

Public transport access is currently limited. No new or enhanced services are proposed, and the availability of public transport and safe access to key destinations will require further assessment.

For instance, there are currently no bus routes directly serving the site, and no bus stops within a reasonable walking distance of approximately 400 metres. Future residents will need to walk approximately 1km (from nearest edge of development) to existing service.

Pedestrian Activity

It should be noted that the site is relatively isolated from key destinations, with schools and shopping areas located 2.5 to 3 km away.

The proposal provides insufficient land-use and housing typology information to support a robust transport assessment. Pedestrian connections should be integrated throughout the development and linked to Gordonton Road. Given the scale of growth proposed, walking and cycling facilities should also be extended beyond Haynes Road to Thomas Road and connected to the wider network.

Stormwater (in relation to Transport)

Stormwater management is not addressed in the transport report and relies on information contained in the stormwater assessment. The proposal should clearly identify stormwater infrastructure within the transport network, including the management of the Gordonton Road

corridor, and confirm the role of piped systems, rain gardens, swales, wetlands, and overland flow paths.

Water and wastewater servicing will require close coordination with IAWAI, particularly where infrastructure must connect to Hamilton's network. Early engagement will be necessary to secure Road Controlling Authority approvals and align servicing works with planned transport investments.

**Water and Wastewater**

Hamilton's water network currently ends around Borman Road, and HCC Master plans for Water (and Wastewater separately) make no provision for servicing the subject area which sits outside of HCC boundary. A key issue is therefore how the site would be serviced. The feasibility of servicing the site should be confirmed in consultation with IAWAI, noting that any self-supply arrangement would place significant obligations and liabilities on the provider.

Wastewater servicing presents similar constraints to water supply. HCC has consistently maintained that it does not support decentralised wastewater systems. IAWAI, as the newly established water services council-controlled organisation for HCC and WDC, is currently developing and considering its policy position on these matters. Accordingly, any interim or localised wastewater treatment solution would need to remain in private ownership and be appropriately managed for the full duration of its operational life. Conditions on the property titles should include maintenance costs for running the microbioreactor/aeration plants which will be covered by the new property owners, until the wastewater can be connected into the public network.

HCC reiterates that there is currently no significant water or wastewater capacity east of the Waikato Expressway, nor is any such capacity planned. Given the out-of-sequence nature of the proposed development, a comprehensive strategy will be required to identify appropriate short- and medium-term infrastructure solutions.

HCC would also emphasise that IAWAI is the relevant authority for water and wastewater servicing matters. In relation to water and wastewater, HCC endorses and refers to IAWAI's comments on those matters.

**Stormwater**

We note the following issues in relation to stormwater, categorised in multiple themes:

<u>WRC Drainage Board Scheme</u>

The Site is located within a WRC rural drainage scheme zone. The WRC stormwater management guideline (TR2020/07) requires that total runoff volume for the 10-year Average Recurrence Interval (**ARI**) event does not increase in the post-development scenario (Section 15.5.2). The current proposal appears to provide minimal volume retention – the solution relies on detention. This may not be acceptable to WRC, which could then present a fatal flaw to the overall stormwater management approach.

The stormwater memorandum identifies that the performance of the existing WRC pumps was not confirmed. The performance of the existing pumps is critical to understanding the performance of the current drainage scheme & needs to be incorporated into the current assessment.

No assessment of comparison of pre- and post-development performance of the drainage scheme is presented. This should be included in the assessment. The assessment should incorporate rainfall events more frequent than the 2-year ARI event and provide an analysis of drain-downs times.

<u>Proposed stormwater management approach</u>

The proposed stormwater treatment train is not clearly articulated in the stormwater memorandum. It is noted that the stormwater memorandum recognises that this will require further resolution. A preferred stormwater treatment train toolbox should be incorporated into the proposal, as this is needed to provide confidence that effects of the proposal are being mitigated in line with the relevant infrastructure standards and stormwater management guidelines.

Potential stormwater management measures considered in the stormwater memorandum include road-corridor raingardens and proprietary devices. These measures can result in high levels of operational cost for council. The adopted treatment train toolbox should align with RITS device selection hierarchy & should seek to minimise ongoing operation and management burdens.

The calculations used to determine the water quality volume (**WQV**) for the site appear to require further review. The WQV calculation only includes runoff from trafficked impervious surfaces (i.e. excludes non-trafficked impervious and pervious surfaces). While trafficked impervious surfaces will be the key source of contaminant load, runoff volumes from other surfaces will still discharge to treatment devices & will need to be incorporated into the sizing of treatment devices – in particular wetlands & swales.

Limited assessment/commentary is made in the stormwater memorandum around potential erosion or channel stability impacts on downstream waterways. Reference is made to hydrology mitigation for frequent storm events, but it is unclear exactly what is intended to be achieved.

<u>Proposed Detention Structure</u>

The proposed stormwater management strategy relies on construction of a large flood detention structure at the downstream extent of the site. The stormwater memorandum acknowledges potential constructability challenges associated with this structure, but no assessment has been made around likelihood or severity of these challenges are. Given that the proposed stormwater strategy is reliant on this structure being implemented, further assessment of the constructability (and functionality) of this structure is warranted to provide assurance/confidence that effects can be appropriately mitigated.

<u>Recognition of the Waikato-Tainui Raupatu Claims</u>

Any application that ultimately discharges to the Waikato River must comply with the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010, namely to:

- Have particular regard to Te Ture Whaimana
- Give notice to the Waikato River Authority of the application
- Have regard to the Waikato-Tainui Environmental Plan

Finally, HCC would also emphasise that IAWAI is the technical advisor to WDC and HCC on stormwater matters. In relation to stormwater, HCC endorses and refers to IAWAI's comments on those matters.

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

## Horsham Downs Estate, FTAA-2606-1257

| Contact Details | |
|---|---|
| **Organisation Name** | Heritage New Zealand Pouhere Taonga (HNZPT) |
| **Contact person** | HNZPT Fast-track Team |
| **Contact Number** | (04) 470 8053 |
| **Email** | fasttrack@heritage.org.nz |

**General Comments**

1. Horsham Downs Estate Limited (Applicant) has lodged an application for referral of the Horsham Downs Estate (project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. In accordance with section 17(1)(c) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the referral application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.
3. HNZPT has been provided application documents that are relevant to the archaeological authority application. These have been assessed and HNZPT comments as follows:

**Consultation and Engagement**

4. On 13 May 2026 HNZPT was notified by email of the Applicant's intention to lodge a Fast-track referral application for the Horsham Downs Estate Project. On 10 June 2026 HNZPT responded, requesting more information about the potential for archaeological material to be present and the date of the villa within the project area.

**Archaeological Authority Application**

5. There is not enough information to determine if an authority is required for the project. The Applicant has provided an archaeological assessment that shows there are no recorded archaeological sites and the risk of encountering unrecorded Māori archaeological sites is very low. The archaeological assessment identified a villa within the project area, but the date of construction has not been determined. The date of construction must be determined; if the villa is pre-1900 then an authority will be required for its demolition.
6. The project area is of significance to Waikato-Tainui, Ngaati Hauaa, Te Haa o te whenua o Kirikiriroa, Ngaati Wairere, Waikato River Authority and Waikato Raupatu Trust. These iwi, hapū, and trust have interests in the area through treaty settlement or are a recognised governance body to help mitigate and manage the impacts to the Waikato River and its tributaries. There has been no reply received from any of the parties stated above. Should an

authority be required, consultation with tangata whenua must be provided with a substantive application.

7. The applicant should explore commissioning a Cultural Impact Assessment to understand the cultural impacts of this development and how these can be mitigated.

**Conclusion**

8. The construction date of the villa within the project area must be established to determine whether an authority is required for the works.
9. If the villa is pre-1900, it must be assessed fully to establish the project's effects on archaeological values. This will inform what conditions will be required to mitigate the adverse effects on archaeological values.
10. If the project is referred and an authority is required, HNZPT anticipates further engagement with the Applicant to ensure all relevant documentation is provided with a substantive application, including:

- A fulsome archaeological assessment;
- Appropriate methodologies and strategies proposed;
- Appropriate draft management plan and research strategy;
- Evidence of appropriate consultation with tangata whenua; and
- Appropriate draft conditions.

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

| | |
|---|---|
| **Project name** | Horsham Downs |

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

## 1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

| | | | |
|---|---|---|---|
| **Organisation name (if relevant)** | IAWAI - Flowing Waters Ltd (IAWAI) | | |
| ***First name** | Andrew | | |
| ***Last name** | Parsons | | |
| **Postal address** | | | |
| ***Contact phone number** | +64 021 791 612 | **Alternative** | |
| ***Email** | Andrew.parsons@iawai.co.nz | | |

## 2. Please provide your comments on this application

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

**IAWAI Role**

IAWAI is the Water Council-Controlled Organisation (CCO) responsible for water services across the Waikato District and Hamilton City. IAWAI is the provider of potable water and wastewater services for Waikato District and Hamilton City and provides technical advice to WDC and Hamilton City Council on stormwater matters. IAWAI outlined its role in a letter to the EPA in June 2026 (see attached).

**Water Allocation Consents**

Neither the existing potable water allocation secured for the Hamilton City urban area or the existing potable water allocations across Waikato District provide for servicing this area. The Applicant will need to secure potable water allocation consents to enable this development.

**Water and Wastewater Servicing**

Insert Fast-track logo

There are no existing water or wastewater networks owned by IAWAI and located within the Waikato District available to service this development.

The applicant proposed extending and connecting to the existing water and wastewater networks that are now owned and operated by IAWAI and are located within the Hamilton City boundary. However, there has been no prior engagement with IAWAI, as the current network owner, or with Hamilton City Council as the former owner, regarding the feasibility of extending these services to the development site.

The existing reticulated water and wastewater networks currently terminate on Borman Road within the Hamilton City urban area. Network planning has not provided for servicing the subject site, which is located outside Hamilton City's urban boundary. IAWAI notes that there is currently no water or wastewater capacity available to service the proposed development, and no such capacity is identified in existing network planning.

Given the out-of-sequence nature of the proposed development, a comprehensive water and wastewater strategy will be required by the Applicant to identify appropriate and sustainable short, medium and long-term infrastructure solutions. These solutions will need to satisfy environmental, public health and other operation, maintenance, renewal and compliance requirements and to meet Te Ture Whaimana o Te Awa of Waikato obligations. IAWAI notes in particular that the national standards for wastewater discharge only apply in the Waikato region to the extent to which they are consistent with Te Ture Whaimana o Te Awa of Waikato. IAWAI considers that the national wastewater standards are too low to give effect to Te Ture Whaimana and higher standards must be achieved.

**Decentralised Water and Wastewater Servicing**

The Applicant proposes decentralised potable water and wastewater systems as a servicing option. IAWAI does not support decentralised servicing in peri-urban areas and will not accept ownership or vesting of these systems.

Any private potable water supply must:

- remain in private ownership;
- comply with Taumata Arowai and any other regulatory requirements (including treatment standards consistent with giving effect to Te Ture Whaimana);
- include appropriate arrangements for its ongoing operation, maintenance, renewal and monitoring; and
- be managed on the basis that it may remain private indefinitely.

The same requirements apply to any decentralised wastewater treatment and disposal system. Any localised wastewater system must remain in private ownership and include safeguards for its

appropriate operation, maintenance, renewal, compliance throughout its operational life, and to support the reconsenting of the system at the end of any discharge consent.

IAWAI does not support interim private systems serving residential subdivisions that create multiple freehold titles and asset owners. These arrangements fragment responsibility for operation, maintenance, renewal, regulatory compliance and decommissioning. They also create significant long-term risk because such systems may be inconsistently maintained, may be difficult or impossible to integrate into the public network, and often become permanent by default.

**Stormwater**

The proposed stormwater strategy raises significant concerns. The current approach appears to rely primarily on detention, with limited provision for volume retention, which may not meet WRC requirements. If unresolved, this could represent a fundamental constraint to the proposal. Additionally, the stormwater memorandum does not clearly define the proposed treatment train. A preferred stormwater treatment toolbox should be identified to demonstrate how stormwater quality and quantity effects will be effectively managed.

We note also the siting for key wastewater facilities adjacent to stormwater detention and ponds, hence the potential for contamination in the event of overflows and/or high rainfall/floods or failure of critical infrastructure.

<u>WRC Drainage Board Scheme:</u>

- It is expected that more detailed technical commentary will be supplied to the applicant by WRC.
- The Site is located within a WRC rural drainage scheme zone. The WRC stormwater management guideline (TR2020/07) requires that total runoff volume for the 10-year ARI event does not increase in the post-development scenario (Section 15.5.2). The current proposal appears to provide minimal volume retention – the solution relies on detention. This may not be acceptable to WRC, which could then present a fatal-flaw to the overall stormwater management approach.
- The stormwater memorandum identifies that the performance of the existing WRC pumps was not able to be confirmed. The performance of the existing pumps is critical to understanding the performance of the current drainage scheme & needs to be incorporated into the current assessment.
- No assessment of comparison of pre and post-development performance of the drainage scheme is presented. This should be included in the assessment. The assessment should incorporate rainfall events more frequent than the 2-year ARI event, and provide an analysis of drain-downs times.

<u>Proposed stormwater management approach:</u>

Insert Fast-track logo

- The proposed stormwater treatment train is not clearly articulated in the stormwater memorandum. It is noted that the stormwater memorandum recognises that this will require further resolution. A preferred stormwater treatment train toolbox should be incorporated into the submission material as this is needed to provide confidence that effects of the proposal are being mitigated in line with the relevant infrastructure standards and stormwater management guidelines.

- Potential stormwater management measures considered in the stormwater memorandum include road-corridor raingardens and proprietary devices. These measures can result in high levels of operational cost for council. The adopted treatment train toolbox should align with RITS device selection hierarchy & should seek to minimise ongoing O&M burdens.

- The calculations determining the water quality volume (WQV) for the site are not correct. The WQV calculation only includes runoff from trafficked impervious surfaces (i.e. excludes non-trafficked impervious and pervious surfaces). While trafficked impervious surfaces will be the key source of contaminant load, runoff volumes from other surfaces will still discharge to treatment devices & will need to be incorporated into the sizing of treatment devices – in particular wetlands & swales.

- Limited assessment/commentary is made in the stormwater memorandum around potential erosion or channel stability impacts on downstream waterways. Reference is made to hydrology mitigation for frequent storm events, but it is unclear exactly what is intended to be achieved.

<u>Proposed Detention Structure:</u>

- The proposed stormwater management strategy relies on construction of a large flood detention structure at the downstream extent of the site. The stormwater memorandum acknowledges potential constructability challenges associated with this structure, but no assessment has been made around likelihood or severity of these challenges are. Given that the proposed stormwater strategy is reliant on this structure being implemented, further assessment of the constructability (and functionality) of this structure and a risk assessment of downstream impact of any failure of this structure and the stormwater system as a whole is warranted to provide assurance/confidence that effects can be appropriately mitigated and that appropriate long term maintenance, operation, monitoring and compliance of the systems will occur.

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

**Managers signoff**



***Andrew Parsons***
***General Manager IAWAI Growth & Delivery***

Date 5 August 2026

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

| | |
|---|---|
| **Project name** | Horsham Downs Estate |

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

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

## 1.0 Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

| | | | |
|---|---|---|---|
| **Organisation name (if relevant)** | NZ Transport Agency | | |
| ***First name** | Nicola | | |
| ***Last name** | Foran | | |
| **Postal address** | | | |
| ***Contact phone number** | 021 241 8186 | **Alternative** | |
| ***Email** | environmentalplanning@nzta.govt.nz | | |

## 2.0 Please provide your comments on this application

NZTA thanks the Minister for the opportunity to comment on the referral of this application into the fast track approvals process.

NZTA has had pre-application engagement with the applicant regarding this project in June 2026. This consisted of a discussion with the applicant, a NZTA representative and representatives from Waikato Regional Council and Hamilton City Council. As part of this engagement, it was noted that the site has not been identified for future development in the Future Proof Strategy or Waikato 2070 (Waikato District Growth and Economic Development Strategy).

As the site was not identified for future development, it was not included in the Hamilton-Waikato Metro Spatial Plan (MSP) Transport Programme 2022, which sets the long-term direction for the transport network and services to serve the wider Hamilton area. NZTA recommends the substantive application addresses how the project will respond to and support the strategic approach set out in the MSP Transport Programme and gives consideration to the potential cumulative effects of greenfield urban expansion not identified within current strategic growth planning documents.

NZTA has also reviewed the documents submitted as part of the application and recommends the following are addressed as part of the substantive application:

- Consideration of pedestrians, primarily deterring or discouraging pedestrians from crossing the Waikato Expressway as a shortcut to the facilities at Rototuna.

Insert Fast-track logo

- The stormwater design and confirmation that this will not adversely affect the State Highway drainage network or other NZTA assets.

NZTA would welcome the opportunity to provide comments on any substantive application in due course.

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

**Managers signoff**

Nicola Foran 4th August 2026

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

| | |
|---|---|
| **Project name** | Horsham Downs Estate - Reference FTAA-2606 -1257 |

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

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

| **1. Contact Details** | | | |
|---|---|---|---|
| Please ensure that you have authority to comment on the application on behalf of those named on this form. | | | |
| **Organisation name (if relevant)** | Waikato District Council | | |
| ***First name** | Donna | | |
| ***Last name** | Tracey | | |
| **Postal address** | Private Bag 544, Ngaruawahia 3742 | | |
| ***Contact phone number** | 0800 492 452 | **Alternative** | 027 614 3315 |
| ***Email** | Donna.Tracey@waidc.govt.nz | | |

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

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

**Managers signoff**



Craig Hobbs

**Chief Executive** **Date** 3 August 2026

3 August 2026

Stephanie Frame
Manager, Fast-track Operations
Ministry for Cities, Environment, Regions, and Transport (MCERT)
referral@fasttrack.govt.nz

Dear Stephanie Frame

**FAST-TRACK PROPOSAL: Horsham Downs Estate - Reference FTAA-2606 -1257**

Thank you for inviting Waikato District Council (WDC) under section 17(1)(a) of the Fast-track Approvals Act 2024 (the Act) to provide written comments on the Referral Application for Horsham Downs Estate.

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

Should you have any queries regarding the content of this document please contact Donna Tracey, Cross Boundary Growth Manager (Donna.Tracey@waidc.govt.nz).

Kind Regards

Craig Hobbs
CHIEF EXECUTIVE
WAIKATO DISTRICT COUNCIL

## Mandatory Comments

Council, under section 17(3) of the Act advises on the following matter:

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

No such applications exist for the properties identified in the referral application.

## General Comments

Council, under subsection (17)(3)(b), provides other comments advising on the following matters:

1. The Horsham Downs project site is located within the Waikato District on Gordonton Road and is currently zoned for rural purposes. The site is adjacent to the Waikato Expressway which in this location is also the boundary between Waikato District Council and Hamilton City Council. The proposal therefore sits outside areas previously identified for urban development through current strategic planning documents (including the Future Proof Strategy, the Waikato Regional Policy Statement, and Waikato 2070). Existing transport modelling associated with the Waikato Expressway has reflected non-urban land use patterns in this location.

2. IAWAI is the Water Council-Controlled Organisation (CCO) responsible for water services across the Waikato District and Hamilton City. As a result, all Fast-track applications with implications for water infrastructure or services are now required to engage directly with IAWAI as the relevant water service provider. WDC considers IAWAI to be the appropriate authority to assess and comment on the capacity, operation, upgrading and management of water, wastewater and stormwater infrastructure that may be affected by, or required to service, the proposed development. Given its statutory responsibilities WDC recommends that IAWAI be recognised as an affected and interested party and be invited to provide comments on any subsequent substantive application.

3. While the proposal may increase housing supply and deliver short-term economic benefits during construction, the Future Proof NPS-UD Housing Development Capacity Assessment identifies no shortfall of housing development

capacity across the sub-region[1]. As the area has not been strategically identified for urban growth, the infrastructure upgrades required to support development have not been planned or funded. This concern is heightened by nearby developments, including Ruakura Growth Cell 2 and Orchard Grove, both Fast-track proposals which together provide more than 30 years of housing supply. In the absence of future planning for this area and the provision of associated infrastructure including social and community facilities Council questions, in the context of section 22(1)(b)(i), how the project could be facilitated in a more timely manner through the fast-track process than through the normal planning process.

4. Development on Highly Productive Land (LUC 2) brings with it important considerations around land use efficiency, infrastructure provision, and long-term sustainability. These matters will need to be balanced alongside the objectives of the proposal and assessed accordingly.

5. The site is proposed to connect directly on to Gordonton Road, which is classified as an Arterial within the One Network Road Classification. The existing speed environment is 80km/h and 100 km/h, which provides context for access, safety, and network integration considerations.

6. An Integrated Transport Assessment (ITA) will be important to understand anticipated traffic impacts including access requirements, trip generation and the effects on the surrounding transport network.

7. There is currently no wastewater network servicing the site this highlights the need for early discussions with IAWAI and detailed consideration of how wastewater servicing would be achieved.

8. While there is an existing water supply scheme in the area, it is not designed to service development of this scale and intensity. The current network operates under restricted flow conditions, which limits capacity, including for firefighting requirements. This highlights the need for early discussions with IAWAI and detailed consideration of how water servicing would be achieved.

[1] Future Proof NPS-UD Housing Development Capacity Assessment

9. Early engagement with Waikato Regional Council on surface and groundwater matters will be important to identify and manage risks such as allocation limits, groundwater effects, and discharge considerations.

10. The site is located within the Waikato Central drainage scheme. Any development will need to ensure that existing levels of service within the scheme are maintained.

11. Stormwater management and design requirements should be determined in consultation with IAWAI, with appropriate regard to the objectives and outcomes of Te Ture Whaimana o Te Awa o Waikato and the wider health and wellbeing of the Waikato River catchment.

12. Where stormwater assets are proposed to be vested to WDC, consideration will be given to lifecycle costs and maintenance requirements to ensure long-term sustainability.

13. The proposed change in land use from rural to urban-scale development has the potential to affect adjoining landowners and the wider area through matters such as reverse sensitivity, visual change, traffic, lighting, noise, and construction effects.

14. The substantive application should also address the potential for existing and ongoing rural activities and environmental conditions in the surrounding area to affect the amenity, health, and wellbeing of future urban residents, and demonstrate how these interfaces and reverse sensitivity matters will be appropriately managed.

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

| | |
|---|---|
| **Project name** | Horsham Downs Estate |

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

## 1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

| | | | |
|---|---|---|---|
| **Organisation name (if relevant)** | Waikato Regional Council | | |
| ***First name** | Katrina | | |
| ***Last name** | Andrews | | |
| **Postal address** | Private Bag 3038<br>Waikato Mail Centre<br>Hamilton 3240 | | |
| ***Contact phone number** | 07 8590 929 | **Alternative** | |
| ***Email** | Katrina.Andrews@waikatoregion.govt.nz | | |

## 2. Please provide your comments on this application

Waikato Regional Council (WRC) appreciates the opportunity to provide comments on this application for referral under the Fast-track Approvals Act 2024 (the Act).

The comments outlined below are grouped into two sections and respond to the following matters:

- Matters under section 17(3)(a) of the Act that a local authority must provide comment on (**PART A**);
- Additional comments, under section 17(3)(b) of the Act, relevant to the proposal (**PART B**).

**PART A – Section 17(3)**

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

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

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

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

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

## PART B – Additional comments

### Section 22

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

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

*(iii) will increase the supply of housing, address housing needs, or contribute to a well functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020)*

*(iv) will deliver significant economic benefits*

*(x) is consistent with local or regional planning documents, including spatial strategies.*

Comments in relation to these criteria are provided below.

For clarity, WRC does not consider any of the other criteria under section 22(2)(a) to be of potential relevance to the project.

The applicant states in paragraph 5.46 of Attachment 1 to the referral application, that "*once operational, the Project is expected to reduce the distance travelled by some residents to get to work, local services and retail (thus reducing Vehicle Kilometres Travelled and consequently $CO_2$ emissions from vehicles)*". There is no information within the referral application that backs this statement up. WRC notes that the project site is located on the northern fringe of Hamilton some 1.1 kilometres from the nearest existing bus stop. The site is separated from the Rototuna town centre and existing public transport routes by the Waikato Expressway. WRC requests further information to back the applicant's statement up.

- **Current strategic planning** - WRC considers that the project is inconsistent with criterion (x) under section 22(2)(a) of the Act relating to regional or local planning documents.

The Future Proof Strategy[1] 2024, is a 30-year growth management and implementation plan for the Hamilton, Waipā, Waikato and Matamata-Piako sub-region and is the Future Development Strategy for the sub-region. The Strategy aims to manage growth in a staged and coordinated manner. It has a compact and concentrated approach to growth, with future development focused in and around key growth areas that are identified on the settlement pattern map. The Horsham Downs Estate site has not been identified for growth in the Future Proof settlement pattern, which is embedded in the Waikato Regional Policy Statement (WRPS). The site is also not identified for development in the Hamilton Urban Growth Strategy 2023 nor Waikato District Growth and Economic Development Strategy (Waikato 2070).

The relevant strategic planning documents do not anticipate urban development to the north of the Waikato Expressway in this location; therefore, the proposal has potential to contribute to urban sprawl into a rural area which is not otherwise anticipated to be developed for urban purposes. This risks undermining strategic growth planning and diverting resources away from existing efficiently serviced urban locations.

- **Housing capacity and economic benefits** - the Future Proof Housing Development Capacity Assessment 2023 (HBA)[2] identifies sufficient plan-enabled residential capacity across all time periods (1-30 years) in Hamilton City and Waikato District but notes a short-medium term (1-10 years) insufficiency in serviced residential land and reasonably expected to be realised capacity. This relates to infrastructure constraints; that issue equally applies to this site (i.e. it is not serviced by infrastructure). In addition to the residential land already planned for in the Future Proof Strategy, there are also significant new areas of housing proposed as part of other fast-track projects listed in Schedule 2 of the Act and applications that have been referred under the Act around the periphery of Hamilton (please refer to Attachment A which shows the current and proposed fast-track projects around Hamilton).

  Collectively, listed and referred projects around the periphery of Hamilton (excluding the residential development proposed in this project) propose a total of approximately 394.5ha of additional residential land. This is in addition to rural-residential development proposed in listed and referred projects. Given that the Future Proof Strategy already provides sufficient housing supply for 30 plus years, there is a high likelihood that further residential developments will merely redistribute housing demand. This creates a risk of diverting demand away from planned growth areas in which significant public infrastructure investment has already occurred.

  WRC considers the statements about the pipeline of greenfield development in Hamilton and the proposed project's contribution to residential development capacity in paragraphs 5.32 and 5.33 of the application companion document substantially overstate the significance of the project's potential contribution to housing supply, by focusing only on those greenfield developments that are currently underway. Paragraph 5.32 reads "…*current and known pipeline greenfield developments in the Hamilton area alone only estimated to provide only*

[1] Our strategic direction | Future Proof

[2] Future Proof Residential Housing and Business Assessment December 2023

*approximately 8.8 years of demand*". This overlooks significant areas of planned and proposed residential development in and around Hamilton, as discussed above.

If the proposal were to be referred, any substantive application must provide robust information backing up the applicant's statement that there is demand for the proposed residential development in the short, medium and long term and that takes into consideration the current context of residential development capacity at the time of the application.

- **'Well-functioning urban environment'** – the project site is located on the northern fringe of Hamilton and on the opposite side of the Waikato Expressway from the existing urban area of Rototuna. The severance created by the Waikato Expressway will limit the ability of the proposed development to create "good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport"[3].

- **Economic benefits –** WRC notes that the applicant's assessment of economic benefits is largely focused on economic benefits during construction. As discussed above, given the significant planned and proposed housing supply in Hamilton, there is a high likelihood that further residential developments will merely redistribute housing demand. This is relevant to the consideration of economic benefits from construction and on-going household expenditure associated with the proposal.

- **Highly productive land** – approximately half of the site meets the transitional definition of 'highly productive land' under the National Policy Statement for Highly Productive Land 2022 (NPS-HPL), as the north-western potion of the site comprises Land Use Capability (LUC) Class 2 soils, based on NZLRI mapping.

  Any substantive application will need to provide assessment to demonstrate whether the proposal is able to meet the relevant clauses of the NPS-HPL; 3.8 – *Avoiding subdivision of highly productive land*, 3.9 – *Protecting highly productive land from inappropriate use and development*, and 3.10 – *Exemption for highly productive land subject to permanent or long-term constraints*.

**<u>Waikato Regional Policy Statement</u>**

**Te Ture Whaimana o Te Awa o Waikato**

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

[3] As per the definition of well-functioning urban environment in Policy 1 of the National Policy Statement on Urban Development 2020

**Urban form and development**

As noted above, the proposal is inconsistent with the Future Proof Strategy settlement pattern, which is embedded in the WRPS. Specifically, Map 43 depicts the Future Proof indicative urban and village enablement areas. As the subject site is not identified as an urban enablement area on this map, the proposal represents an unanticipated development. Given this, a number of specific provisions from the WRPS are relevant to the proposal and should be assessed in any subsequent substantive application. In particular, this includes Policy UFD-P11, Policy UFD-P14, Method UFD-M5, Method UFD-M49, Appendices APP11 – General development principles, and APP13 – Responsive planning criteria (out of sequence and unanticipated developments).

**Ecology**

The following information will need to be provided as part of an assessment of ecological effects in any substantive application for the project:

- Provision for appropriate management plans to avoid, remedy or mitigate adverse effects on breeding/nesting birds, including ground nesting pipit and pied oystercatcher as listed in the Ecology Assessment (Attachment 13 to the referral application).
- Description of how loss of natural inland wetlands will be avoided, their values protected, and their restoration promoted as per Policy 6 of the National Policy Statement for Freshwater Management 2020 (NPS-FM) and/or where exceptions to the loss of extent or values of natural inland wetlands apply under Clause 3.22 of the NPS-FM. This is particularly important as the proposed Concept Plan indicates that wetlands identified in Figure 2 of the Ecology Assessment will be removed and the Stormwater Memorandum (Attachment 7 to the referral application) proposes a flood pond/wetland in the north-west of the site.
- Considers effects on putative wetland areas in low lying areas near the north-western boundary of the site and associated with Area 4 (as identified in Figure 2 of the Ecology Assessment).

**Stormwater**

The information in the referral application relating to stormwater management is high level and concept in design. The relevant WRC guidelines are referenced for further development of stormwater management design. The key stormwater restriction for the project area is the downstream WRC Freshfield Pump Station, which controls all the stormwater runoff from the Freshfield catchment. This is discussed in further detailed below.

**Flooding and land drainage**

The project site is located within the WRC's Freshfields Land Drainage Subdivision, which includes drains along the northern and western boundaries of the site**.** The level of service for this land drainage subdivision is to drain water from a 10% AEP rainfall event within three days. This is intended to remove ponding from rural areas to prevent pasture damage occurring, rather than to prevent inundation. The drainage network is not designed to accommodate urban stormwater runoff.

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The Freshfield catchment is a former swamp that has been drained, resulting in ongoing land subsidence. The lower catchment now functions as a low-lying basin, is entirely dependent on pumping for drainage, and is already susceptible to flooding.

The project's proposed location within the land drainage subdivision will see increased impervious surfaces as a result of urban development. This will mean stormwater reaches the system faster which may impact the capacity of the pump, increase rates of erosion within the subdivision drainage network, leading to increased maintenance costs, and result in longer ponding periods.

Any substantive application needs to include a detailed assessment of the downstream hydraulic impacts of the proposed development. As part of this, we recommend:

- Seeking further confirmation that the adopted pump curve, duty point and operational controls are correct, given there is uncertainty in the Freshfield pump operational parameters in the model documented in the Stormwater Memorandum.
- Providing evidence of model verification against a known flood in Freshfield scheme, when information becomes available.

**Earthquake and liquefaction hazards**

The Geotechnical Assessment (Attachment 9 to the referral application) appears to incorrectly interpret the Kukutaruhe Fault's 100,000-year SRT_gen value as indicating the fault is inactive. This value relates to the period over which slip rates have been determined and does not represent the time since the last rupture.

Recent research[4] indicates the Kukutaruhe Fault has been active within the last approximately 15,700 years and is capable of generating at least a Mw 7.2 earthquake; therefore, its classification as 'inactive' requires clarification.

Given the recent findings of new earthquake faults, the scale of the proposed residential development and the vulnerability of its residents, we recommend that any substantive application provides further supporting evidence in relation to the Kukutaruhe fault's classification as 'inactive' and includes further comprehensive seismic hazard assessment for appropriate seismic design to address appropriate design levels to withstand potential earthquake and liquefaction hazards for buildings and infrastructure.

While natural hazards are assessed in the geotechnical and stormwater assessments, there is no clear justification as to how the natural hazard risk was derived as "not significant" in the assessment of the National Policy Statement for Natural Hazards 2025 (NPS-NH) in section 6.28 of the Planning Memorandum (Attachment 2 to the referral application). Any substantive application should provide a revised assessment to clearly demonstrate how the NPS-NH risk matrix has been applied to appropriately identified natural hazards and how the overall risk rating, and residual risk, was derived.

[4] Tephra seismites—Understanding seismic hazard of hidden faults by analyzing liquefied tephra layers in lakes | Science Advances; 3805-Potential-shallow-seismici-sources-Hamilton-Basin.pdf

**Water supply**

The application lists two potential options for potable water supply:

- A private network supplied by a groundwater take and rainfall runoff harvesting; or
- Connecting to the public water supply network operated by IAWAI.

Further, the application states the water supply system will be adaptable should a connection to the public water supply network be desirable in the future. This indicates that the intent might be to develop the private network supply first.

Several water-related consents will be required for the proposal. This includes consents to:

- Construct a bore or bores
- Take groundwater via a bore or bores
- Take surface water via a rainfall runoff harvesting approach
- Divert water within the site in terms of water management during and after construction
- Take water for dewatering purposes during construction and possibly after construction; and
- Dam water in ponds situated in off-stream areas during and possibly after construction.

The calculated demand for the development is an average daily flow requirement of 516.3 $m^3$ and a peak flow requirement of 29.9 l/s, which is equivalent to ~2583 $m^3$ as a volume over 24 hours. The application's preliminary testing and assessment indicate there is potential for a groundwater take to be developed that could yield more than 450 $m^3$/day. It also states that more detailed investigation and testing will be undertaken as part of the substantive application. This additional detailed work aligns with WRC expectation that a detailed assessment be carried out as part of a consent application process and prior to any consent being granted.

If the proposal is to connect to a public water supply network, IAWAI may require a consent to take surface water from the Waikato River that relates specifically to this development be obtained by the applicant as part of any consideration by IAWAI for this development to connect to the public network.

The project area is located within the Hamilton Basin – North groundwater management level area. Given the current allocation level for this management level area, it is expected it is likely that there is ample allocation available to provide for a groundwater take consent at a volume commensurate with what we understand to be the proposed scale of the development.

The subject groundwater that would be tapped is ultimately hydraulically connected to the mainstem Waikato River and thus needs to be, and is, accounted for in the WRC surface water allocation system. With a grant of a groundwater take consent allowing for a volume commensurate with what we understand to be the proposed scale of the development, water will remain available for allocation within each catchment's primary allocable flow across all months of the year.

**Wastewater**

For wastewater servicing and discharge, the application lists two options; connection to a public network, or connection to a private wastewater treatment plant. Connection to Hamilton City's existing sewer network would be WRC's preferred option.

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If the proposal is to construct a private wastewater treatment plant with disposal to a tributary of the Waikato River, a detailed design supported by an assessment of effects for discharging treated wastewater will be required as part of any substantive application. This assessment would have to consider cultural effects, ecological effects and the overall requirements of Te Ture Whaimana o Te Awa o Waikato. In addition, such a proposal would need to describe the mechanisms that would be put in place to ensure that operation, maintenance and compliance would be achieved on an ongoing basis.

**Transport**

The scale of residential development proposed is significant and has the potential to generate substantial travel demand, with the applicant estimating approximately 7,800 daily vehicle movements and around 860 peak hour vehicle trips.

We consider the following matters will require detailed assessment through a future Integrated Transport Assessment and supporting transport documentation, including:

- Travel demand management opportunities and measures to support mode shift.
- Walking and cycling connectivity to the existing and planned active mode networks.
- Public transport accessibility and the ability of the development to support future public transport services.
- Network resilience and staging of transport infrastructure upgrades relative to development growth.
- Assessment of cumulative effects in conjunction with other planned growth and urban development in the northern Hamilton and Waikato urban growth area.

While the Hamilton-Waikato Metro Spatial Plan identifies Rototuna as a growth node that will form part of the future rapid transit network, the proposal site is located some distance from the Rototuna town centre. The severance created by the Waikato Expressway is of particular concern, as this may limit walking, cycling, and public transport accessibility between the development and existing or future transit services. Any substantive application should provide further information regarding how residents and site users would access existing and future public transport services, including the future rapid transit network.

Based on the information available in the referral application, it is not yet clear to what extent the proposal supports the transport-led urban form envisaged by the Metro Spatial Plan. Information on anticipated travel behaviour and mode of share assumptions would also assist in assessing strategic alignment.

**Other relevant considerations**

In addition to the above comments, we highlight the following points for consideration in relation to effects of the proposed project and further information that would be required as part of any subsequent substantive application.

**Earthworks**

The project area is 54 hectares of pastoral farmland and necessary earthworks will be carried out in accordance with best practice and undertaken with appropriate erosion and sediment control measures to ensure potential adverse effects are avoided or minimised. The application also states the earthworks will be undertaken in accordance with WRC's TR2009/02 (Erosion and sediment control: guidelines for soil disturbing activities).

WRC recommends earthworks are undertaken during the summer earthworks season to reduce the potential for the discharge of sediment into receiving watercourses. We also recommend earthworks are undertaken in stages in accordance with detailed Erosion and Sediment Control Plans to minimise any effects beyond the site boundary.

**Acid sulphate soils**

The WRC Acid Sulphate Soil probability layer[5] indicates the project area has a high probability of containing acid sulphate soils. When disturbed (e.g. excavated) and exposed to oxygen, acid sulphate soil materials can produce sulfuric acid which can become mobilised following rainfall. This can lead to impacts on the environment, including aquatic ecosystems, and infrastructure.

WRC understands any substantive application will include an Acid Sulphate Soil Management Plan for managing these soils should they be encountered. WRC recommends the applicant undertakes a more in-depth assessment to confirm the presence of acid sulphate soils to inform this management plan.

**Potential HAIL sites**

The application states there are no known areas of contamination from past HAIL activities within the project area. Given the land's previous historical use, there may be a number of HAIL sites, such as agrichemical storage and use, fuel storage and livestock dosing.

WRC recommends the preparation of a Contaminated Site Management Plan (CSMP) as part of any substantive application. This should include targeted investigation for HAIL areas to define the extent of any contamination and inform appropriate management and remediation measures prior to earthworks commencing.

**Resource consent requirements**

Activities likely requiring authorisations under the operative Waikato Regional Plan include:

- Stormwater - dam, divert and discharge
- Wastewater - discharge to water
- Ground water take -water permit for potable water supply.
- Groundwater and surface water take for dewatering activities

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

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- Soil disturbance, vegetation disturbance, wetland construction and associated cleanfilling activities
- Structures in waterways - bridges/culverts and outfalls
- Construct a bore or bores
- Take groundwater via a bore or bores
- Take surface water via a rainfall runoff harvesting approach
- Divert water within the site in terms of water management during and after construction
- Take water for dewatering purposes during construction and possibly after construction; and
- Dam water in ponds situated in off-stream areas during and possibly after construction.

**Summary of Issues for Waikato Regional Council**

Given the site's location within an unserviced rural area that is physically separated from the existing urban area by the Waikato Expressway, and Hamiton City having a 30 year plus sufficient residential supply, the regional benefits have not been demonstrated to justify the establishment of a residential development in a location that lacks integration with established urban infrastructure and services. The proposal:

1. Is not identified for future growth in either the Future Proof Strategy or the Waikato District Growth and Economic Development Strategy[4] (2070).
2. Is out of sequence and does not meet the unanticipated developments' criteria (APP13) of the WRPS.
3. Does not demonstrate that it is a well-functioning urban environment as per the National Policy Statement on Urban Development 2020 (NPS-UD).

If this proposal is referred, then within the substantive application WRC requests the proposal details the following matters:

4. Demonstrates how the proposal meets the WRPS and Future Proof Strategy or the Waikato District Growth and Economic Development Strategy[5] (2070);
5. Demonstrates demand for residential development in the short, medium and long term in the context of the existing and proposed housing capacity at the time of the application;
6. Demonstrates how the proposal will give effect to Te Ture Whaimana;
7. Demonstrate whether the proposal is able to meet the relevant provisions of the NPS-HPL in relation to highly productive land;
8. A detailed Ecological Impact Assessment (EIA) which includes assessment of natural inland wetlands ad NPS-FM matters;
9. Provision of detailed design drawings of the final design of the stormwater system(s);
10. Provision of a detailed assessment of the downstream hydraulic impacts of the proposed development;
11. Further supporting evidence in relation to the Kukutaruhe fault's classification as 'inactive' and includes further comprehensive seismic hazard assessment and a revised assessment to clearly demonstrate how the NPS-NH risk matrix has been applied;

12. A detailed Integrated Transport Assessment that includes further information regarding how residents and site users would access existing and future public transport services;
13. A detailed Contaminated Site Management Plan (CSMP) and Acid Sulphate Soils (ASS) investigation;
14. Details of the proposed water supply, wastewater treatment and discharge systems, and if they are standalone proposals – who will operate, maintain and manage the systems;
15. Whilst WRC has undertaken a preliminary assessment of potential consent requirements based on the initial documentation, confirmation is required to detail the exact consents sought for each activity e.g. exact consents associated with the final stormwater design, the proposed water take and wastewater options, earthworks and any ancillary consents e.g. dewatering consents, structures within waterways;
16. Conditions of consent commensurate with the level of effects of each activity for which consent is sought.

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

**Managers signoff**



AnaMaria d'Aubert **Date** 5 August 2026

Manager – Regional Consents

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**Attachment A**

## Waikato Region current and proposed Fast Track projects July 2026

