Hon Todd McClay

Minister of Agriculture
Minister of Forestry
Minister for Trade and Investment
Associate Minister of Foreign Affairs

21 SEP 2026

Hon Chris Bishop
Minister for Infrastructure

TM011064

Dear Minister Bishop,

Thank you for the opportunity to provide comments on the FTAA-2607-1270 Stillhaven application under the Fast-track Approvals Act 2024 (FTAA), as part of my responsibilities as Minister of Agriculture. My comments on this application are outlined below.

I am generally supportive of referring this project to the Expert Panel, and consider that the project aligns with the intent of the FTAA to deliver regionally and nationally significant infrastructure projects.

I appreciate that the application notes key areas that the applicants will provide more information on, if the project is progressed. As Minister of Agriculture, I will be specifically interested in:

- additional information about the Land Use Capability class (LUC) of the soils on the proposed project site; and
- information on the wetlands area included in the project area, as this relates to the National Environmental Standards for Freshwater (NES-F).

Thank you for the opportunity to provide feedback. I look forward to learning about the outcome of this application in due course.

Warm regards,

Hon Todd McClay
Minister of Agriculture

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand | +64 4 817 6810 | t.mcclay@ministers.govt.nz

Appendix One: Draft response to Minister Bishop

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

Project name	Stillhaven

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.			
***Portfolio**	Seniors		
***First name**	Hon Casey		
***Last name**	Costello		
Contact person (if different from above)			
***Contact phone number**	+64 4 817 6827	**Alternative**	
***Email**	c.costello@ministers.govt.nz		

2. Please provide your comments on this application
My comments are attached below.

Minister's signoff

Hon Casey Costello

Minister for Seniors

Date 15/4/20

Hon Casey Costello

Minister of Customs
Minister for Seniors
Associate Minister of Health
Associate Minister of Immigration
Associate Minister of Police

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act referral application: Stillhaven, FTAA-2607-1270

Dear Chris

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

I have considered whether this application is likely to '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)', under s22(2)(a)(iii) of the Act, based on the information provided in the application. I will leave it to you and other relevant Ministers to assess the other criteria.

The following aspects of the project are likely to meet this criterion:

- the construction of approximately 700 residential dwellings
- a retirement village with approximately 200 retirement units, 40 to 50 aged care beds, and associated facilities.

Based on this information, the project is suitable for referral to the fast-track process. If the application is referred, I would welcome the opportunity to comment on the project in more detail.

Sincerely,

Hon Casey Costello

Minister for Seniors

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand | +64 4 817 6827 | c.costello@ministers.govt.nz

Hon Tama Potaka

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

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

16 SEP 2026

CORTP-9209

Tēnā koe Hon. Bishop

Thank you for your invitation to comment on the fast-track consent application for the Stillhaven project in Te Kōwhai, Waikato. The proposal comprises a mixed-use urban development including approximately 700 residential dwellings, a retirement village comprising approximately 200 retirement units and 40 to 50 aged care beds, commercial areas providing local services and amenities, public open space, and associated infrastructure. The development would extend the existing Te Kōwhai township and provide a range of housing options.

Te Kōwhai is identified as a future growth area within Waikato District, with growth driven by the continued expansion of the Hamilton-Waikato urban area and demand for housing close to Hamilton. The proposal would provide a substantial increase in housing supply and housing choice, including retirement living opportunities.

The site is currently zoned General Rural and is not identified as a Future Proof urban growth area. However, Te Kōwhai is expected to experience ongoing growth due to its proximity to Hamilton. The proposal is located close to planned growth areas such as Rotokauri and Horotiu and would extend the existing township. As the development is reliant on infrastructure that is still being planned or delivered, consideration will need to be given to infrastructure capacity, timing and sequencing should the project proceed. The site also comprises predominantly highly productive Class 2 land, which will require careful consideration through the assessment process. Infrastructure delivery will be an important consideration. Water and wastewater servicing is intended to connect to infrastructure currently being delivered along Horotiu Road, although capacity and connection arrangements are yet to be confirmed. The site also contains existing drainage features and low-lying land, and further assessment of flooding, stormwater management, wetland values and wider transport effects will be required.

From the perspective of the Housing Portfolio, the proposal has the potential to make a significant contribution to housing supply and housing choice in the Hamilton-Waikato growth area, including providing retirement housing and aged care facilities. While there are infrastructure, transport, flooding and land-use matters that warrant further consideration, these can be worked through during the detailed assessment process. I have no objection to this project being referred to the next stage.

Mauriora,

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 the Stillhaven project under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on the Stillhaven 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

8 September 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0038652

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on the referral applications for Out of Scope [redacted] Stillhaven (FTAA-2607-1270).

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 provided by the applicants.

Out of Scope [redacted]

[redacted]

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand | +64 4 817 6801 | n.willis@ministers.govt.nz

Out of Scope

Stillhaven, FTAA-2607-1270

The proposed 104-hectare development east of Te Kowhai would deliver around 700 dwellings, a retirement village with 200 units and up to 50 aged-care beds, 1,500 square metres of commercial space across two commercial nodes, and supporting open space and infrastructure over a 12-year period.

According to the applicant's economic assessment, capital expenditure is estimated at approximately $146.7 million for residential land development, $18 million for the aged-care hospital and $5 million for the retirement village's main facilities, excluding construction of the individual dwellings. This expenditure is estimated to generate present-value direct and indirect GDP of $94.7 million to $120.7 million and household income of $55.4 million to $70.6

million. Including induced effects, these estimates increase to $135.9 million to $173.0 million in GDP and $72.3 million to $92.1 million in household income. The ranges reflect 8 per cent and 2 per cent discount rates.

The expenditure is estimated to support 1,344 Modified Employee Count-years (MEC-years) directly and indirectly, increasing to 1,816 MEC-years when induced effects are included. A Modified Employee Count is a measure of employee numbers adjusted to include working proprietors, while MEC-years measure employment accumulated over the development period. These are cumulative figures, not annual employment estimates. Direct and indirect employment is estimated to peak at 155 MECs for residential land development and 105 MECs for the retirement village, increasing to 210 and 142 MECs respectively when induced effects are included.

The development would expand housing and retirement-living capacity and choice. However, converting the site from dairy farming would involve an economic opportunity cost, including forgone dairy-farming income and activity. Over 35 years, the assessment estimates forgone direct and indirect GDP of $10.5 million to $21.3 million and 210 MEC-years, increasing to $12.9 million to $26.1 million and 251 MEC-years when induced effects are included. As the assessment does not quantify net national benefits, the estimates indicate the scale of economic activity associated with the project rather than its net benefit to New Zealand.

On balance, the proposal appears likely to deliver significant regional economic benefits under section 22(2)(a)(iv), particularly through its development expenditure, contribution to regional GDP, income and employment, and longer-term expansion of housing and retirement-living capacity, subject to the assumptions and limitations above. It also appears relevant to section 22(2)(a)(iii), as it would materially increase housing supply and choice in the lower Waikato and may support a more responsive housing market and well-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	Stillhaven Project

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	Director-General of Conservation Statutory delegations are in place for the Department of Conservation (DOC / the Department) to provide commentary on behalf of the D-G.		
***First name**	Shawn		
***Last name**	Gardner		
Postal address			
***Contact phone number**	s 9(2)(a)	**Alternative**	
***Email**	Fast-track@doc.govt.nz;		

2. Please provide your comments on this application

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



Linda Kirk

16 September 2026

Director-General of Conservation s17 comments

Project name	Stillhaven Project
Applicant name	Stillhaven Limited
Application number	FTAA-2607-1270
Project summary details	The project is for the construction and establishment of a mixed-use urban development on approximately 104 hectares of rural land near the existing Te Kowhai township in the Waikato District. The project area is accessed from Te Kowhai Road and Horotiu Road and is located approximately 16 kilometres north-west of Hamilton. The project comprises: • Approximately 700 residential dwellings across a range of housing densities • A retirement village across approximately 11 hectares of land, comprising approximately 200 retirement units, 40 to 50 aged care beds, and associated facilities • Two commercial areas totalling approximately 5,000 m^2, with approximately 1,500 m^2 of commercial floor space for local services and amenities • Public open space, including stormwater management areas, recreation areas, and ecological enhancements • Transport, stormwater, wastewater, water supply, electricity, and telecommunications infrastructure, including upgrades to existing infrastructure and construction of new infrastructure The applicant seeks the following approvals via the fast-track approvals process to authorise the project, including some approvals sought at this stage on a precautionary basis, subject to further investigations prior to any substantive application: • RMA approvals • Wildlife Act Approvals • An approval, a dispensation, or an authorisation that would otherwise be applied for in respect of a complex freshwater fisheries activity under the Freshwater Fisheries Regulations 1983 or the Conservation Act 1987

1 Overview of comments

1.1 Applicant Engagement

1.1.1 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.

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

1.1.3 DOC was notified of the application on 23 June 2026;

1.1.4 DOC provided a pre-lodgement notification response on 29 July 2026.

1.2 Conservation Approvals

1.2.1 The referral application states that the Project will require the following conservation approvals:

- Approval under the Wildlife Act 1953 for the salvage, relocation, and incidental injury and death of indigenous lizards during vegetation clearance.
- Complex Freshwater Fisheries Approval (CFFA) under s.42(4)(j)(iv) of the FTAA for the transfer of live aquatic species.

1.3 Other considerations

1.3.1 It is noted that the applicant has indicated a desire to undertake the project in stages, with no definite timeline for actualising the full development. DOC would like to note that approvals under the Wildlife Act 1953 (WAAs) are typically not issued for more than 10 years at a time. The term of the approval should be confined to a timeframe within which the environment will not seriously change. Otherwise, the effects could be different from what is assessed under the fast-track process. In seeking a staged long-term approach, its incumbent on the applicant to demonstrate how the Panel, when considering the substantive application, can be certain all the conditions it is proposing will remain appropriate, and that the effects will be no greater than the Panel assesses them to be.

1.3.2 Further, the applicant is proposing to apply for a CFFA under s.42(4)(j)(iv) of the FTAA. This is an approval for the transfer of aquatic wildlife under s.26ZM(3)(b) of the Conservation Act 1987. The applicant does not appear to have provided a specific term over which they would like this approval to apply. DOC would typically only grant such approvals for a period of two years. The term of the CFFA should be confined to a timeframe within which the freshwater environment will not seriously change. Otherwise, the effects could be different from what is assessed as a part of the fast-track process. In seeking a staged long-term approach, it is incumbent on the applicant to demonstrate how the Panel, when considering the substantive application, will be certain all the conditions it is proposing will remain appropriate, and that the effects will be no greater than the Panel assesses them to be.

1.3.3 Further detail is provided in Part 3 of these comments.

1.4 Conclusion

1.4.1 In conclusion, DOC is not aware of any reason the Project should not be referred.

2 Criteria for Minister's decision on referral application

2.1.1 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.

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

2.2 Criteria for declining a referral application

2.2.1 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 Project should be declined.
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	Based on the information available, DOC has not identified any inconsistency with any relevant Treaty settlement or other obligations.
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.

Section	Criteria	Comments
21(5)(c)	Would the project have significant adverse effects on the environment	Based on our knowledge of the existing environment and species expected to occur on the site, our understanding of the Project, and our experience of the kinds of design measures and conditions that could be implemented, DOC considers that once more detailed information is available, it would be possible to achieve a project with the imposition of conditions (that are appropriate, enforceable, include best management practice, and apply the relevant ecological management plans, as and where required), that does not have significant adverse effects on the environment.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the applicant's compliance history.
21(5)(g)	Would a substantive application have any competing applications	DOC has identified the following application that relates to the same natural and physical resources as those applied for in the application: Holder: Boffa Miskell Limited ID: 126744 Status: Pending Primary Service: Permits to collect, capture, handle, release, or kill Location: Waikato – non-DOC land Description: Surveys for native skinks and geckos for the purpose of characterising the ecological value of the environment and/or any circumstances where required, including sites that have been proposed for development and/or where habitat is likely to be affected or removed, to determine whether there are risks to native lizards.

2.3 Criteria for accepting a referral application

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

2.3.2 DOC has considered these criteria and has provided comments in the table below.

Section	Criteria	Comments
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	The applicant is seeking resource consents, WAA and CFFA for the translocation of protected freshwater species. The potentially long timescale of the project makes the management of wildlife effects across the entire lifetime of the project difficult to understand at this time. Applying for WAA where effects are not expected to occur for more than 10 years through the business-as-usual process closer to the time when effects are anticipated may be more efficient and effective from an effects management perspective. However, given the multiple approvals sought, there would likely be cost and efficiency benefits for the applicant in terms of consideration of the approvals being combined under the FTAA decision-making framework.
22 1A	Is there a relevant Government Policy Statement?	This criteria was added by the 2025 Amendment Act. Currently there are no relevant Government Policy Statements.
22(2)(a)(ix)	Will this project address significant environmental issues?	No

22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	The following DOC Statutory Planning documents are found to be relevant to the project: • Conservation General Policy 2005 • Waikato Conservation Management Strategy 2014 At a high level, no inconsistency with these documents has been identified, but the Project will need to consider them if it proceeds to a substantive application. Consideration needs to be given to: • The relevant provisions in Te Ture Whaimana with respect to streams which are tributaries of the Waikato River; • Maintaining and restoring the ecological integrity of relevant ecosystems and habitat types; • Conserving any Threatened and At-Risk species to ensure their persistence; and • Protecting freshwater fish habitat, fish passage, and the maintenance of habitat connectivity and water quality of any waterway.
22(b)	Any other matters the Minister may consider as relevant?	The applicant is proposing to apply for CFFA under s. 42(4)(j)(iv) of the FTAA. This is an approval for the transfer of live aquatic wildlife as though under s26ZM(3)(b) of the Conservation Act 1987. Typically an approval under s26ZM(3)(b) would be granted for a period of two years. While it is understood that approvals may be granted under Fast-track for any period deemed appropriate by the Panel, DOC notes that much can change from a freshwater ecology perspective over timescales that are greater than a few years. Therefore, the applicant will need to ensure that the Panel has confidence that the approvals including the conditions will remain appropriate for the duration sought.

3 Other considerations

3.1 The timing of activities that will impact wildlife and freshwater fisheries is a critical consideration for DOC in relation to how best to advance the required approvals. It is noted that the applicant has stated:

> *Stillhaven will consist of 8 stages . . . Apart from Stage 1 occurring first, the subsequent stages may be delivered in any order in response to market demand.*

It is not clear at this time what the anticipated development timeline is for the full 8 stages of the project. However, management regimes for wildlife and the presence of wildlife at the site is likely to meaningfully change beyond a 10-year timeframe. It would therefore be ideal for any WAA that are included in the FTAA application to either be for those activities that are expected to occur within the next 10 years or for such approvals to be structured in such a way that DOC can review the applicant's proposed management regime on a recurring basis with no more than a 10-year period. Similarly, approvals for the transfer of freshwater species are typically only granted for a period of 2 years. DOC recommends that fish transfer approvals not exceed this timeframe or there are further surveys and review of conditions/standards prior to each next stage.

4 Matters for the Minister to specify (s27)

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

4.1 For any conservation approvals being sought beyond the typical timeframe for such approval, the applicant should provide a clear plan for how such approvals will adhere to conditions and respond to changing ecology over this timeframe. This may include management plans with requirements for further reviews/surveys and certifications at set intervals or prior to each activity.



Linda Kirk
Fast Track Applications Manager

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

Date: 16 September 2026

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

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

Project name	Stillhaven - Reference FTAA-2607 -1270

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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**	s 9(2)(a)	**Alternative**	
***Email**	s 9(2)(a)		

2. Please provide your comments on this application

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

This set of comments responds to the invitation to comment on the fast track referral application for the Stillhaven development proposal in Waikato District.

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 July 2026 (see attached).

Water Allocation Consents

Neither the existing potable water allocation secured for the Hamilton City urban area nor the existing potable water allocations across Waikato District provide for servicing this area. The

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Applicant will need to secure potable water allocation consents to enable this development and transfer these to IAWAI should a connection to the IAWAI network be sought.

Water and Wastewater Servicing

The applicant proposes extending and connecting to the existing water and wastewater networks that are now owned and operated by IAWAI and are located within the Waikato District boundary. However, there has been no prior engagement with IAWAI regarding the feasibility of extending these services to the development site.

There are no existing water or wastewater networks owned by IAWAI and located within the Waikato District available to service this development. Network planning has not provided for servicing the subject site. IAWAI notes that there is currently no local water or wastewater capacity available to service the proposed development, no strategic infrastructure is in place or planned to service the development, and no such capacity is identified in existing network planning. There is a planned future water and wastewater scheme for parts of Te Kowhai Village; however, these future plans do not include servicing the Stillhaven proposal.

Given the out-of-sequence nature of the proposed development, a comprehensive water and wastewater strategy will be required by the Applicant. Modelling work will be needed to understand whether connection to water and/or wastewater networks is feasible. The strategy will need to identify appropriate and sustainable short, medium and long-term infrastructure solutions. These solutions must satisfy environmental, public health and other operation, maintenance, renewal and compliance requirements and meet Te Ture Whaimana o Te Awa o 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 o 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, although the proposal notes that these are not preferred.

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:

- provide sustainable and long-term water supply security for the development;
- 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 and compliance throughout its operational life, and to support 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 described in the infrastructure memo raises several concerns.

The application relies on two stormwater discharge locations: an existing culvert beneath Horotiu Road approximately 150 metres east of the Ngaaruawahia Road intersection, and a farm drain at the northeast of the site adjacent to proposed Wetland F. Both outlets appear to discharge to Waikato Regional Council drainage scheme areas and, based on available information, may be constrained in terms of flow capacity. In particular, the Horotiu Road outlet may have significant capacity limitations. This is likely to result in higher attenuation requirements than currently identified and may create an elevated residual risk of downstream flooding due to increased runoff volumes.

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. If these matters cannot be satisfactorily resolved, they could represent a significant constraint to the proposed stormwater management approach.

Stormwater detention tanks are proposed on individual lots to provide attenuation up to the 10-year ARI event. This is not consistent with the Regional Infrastructure Technical Specifications, which generally require reticulation networks to accommodate the 10-year ARI event and attenuation to be provided through centralised public devices before discharge to receiving environments or the wider network.

Existing grades on the proposed site are very flat. It can be very difficult to achieve appropriate post-development grades on this type of site without importation of significant amounts of fill. The cut-fill balance presented in the Infrastructure Memo indicates minimal importation of material to the site. This raises concerns around the ability to deliver an efficiently functioning

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stormwater system that aligns with relevant infrastructure requirements/guidelines. Concerns also exist around elevated operation and maintenance requirements to maintain drainage functionality if such a flat system were to be approved. IAWAI notes that further investigations are proposed to identify opportunities to mitigate existing flooding issues affecting neighbouring properties and supports continued exploration of these opportunities where feasible.

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
GM Growth & Delivery IAWAI

Date 16 September 2026

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

Project name	FTAA-2607-1270 Stillhaven

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)	NZ Transport Agency		
***First name**	Nicola		
***Last name**	Foran		
Postal address			
***Contact phone number**	s 9(2)(a)	**Alternative**	
***Email**	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application

The NZ Transport Agency Waka Kotahi (NZTA) thanks the Minister for the opportunity to comment on the referral of this application into the fast-track approvals process.

The development does not propose any new access points from the subject sites directly onto the state highway, however it is understood that traffic from the proposed development will gain access to the state highway via the existing connections with local roads.

As always, in order to understand the impact of the proposed development on the wider state highway network, NZTA expects that the substantive application includes a comprehensive Integrated Transport Assessment that assesses the potential impact of the development on existing state highway infrastructure.

NZTA does not have any concerns with this project being referred, and welcomes the opportunity to discuss the proposal further with the Applicant and 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 nicolaforan Date 11 September 2026

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

Project name	Stillhaven - Reference FTAA-2607-1270

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**	s 9(2)(a)
***Email**	s 9(2)(a)		

2. Please provide your comments on this application

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

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

Managers signoff



Craig Hobbs

Chief Executive

Date 15 September 2026

15 September 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: Stillhaven - Reference FTAA-2607-1270

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 Stillhaven.

Council's response and comments on the proposed project area are set out below.

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

Kind regards



Craig Hobbs
CHIEF EXECUTIVE
WAIKATO DISTRICT COUNCIL

Mandatory Comments

Under section 17(3)(a) of the Act, Council provides the following information:

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 Stillhaven project area is located within the Waikato District with frontage to Horotiu Road and Te Kowhai Road, and is currently zoned for rural purposes. It therefore lies outside areas identified for urban development in current strategic planning documents, including the Future Proof Strategy, the Waikato Regional Policy Statement, and Waikato 2070.

2. The project area was investigated between 2014 and 2017 through development of the Ngaaruawaahia, Hopuhopu, Taupiri, Horotiu, Te Kowhai, & Glen Massey Structure Plan 2017. It was not selected for urban development because of the significant flood hazard shown in image 1.

3. IAWAI is the Water Council-Controlled Organisation (CCO) responsible for the provision and management of water supply and wastewater services across the Waikato District and Hamilton City. Accordingly, Fast-track applications with implications for water supply or wastewater infrastructure and services should 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, upgrade requirements, and management of water supply and wastewater infrastructure.

4. While WDC retains ownership of, and decision-making responsibility for, stormwater assets, IAWAI provides technical advice and is responsible for the operation and maintenance of the stormwater network on Council's behalf. As a result, WDC will rely on IAWAI's technical expertise in assessing stormwater servicing requirements and potential network impacts associated with the proposed development. Given IAWAI's responsibilities for water supply,

wastewater services, and its operational role in stormwater management, WDC recommends that IAWAI be recognised as an affected and interested party and be invited to provide comments on any subsequent substantive application.

5. While the proposal may contribute to housing supply and provide short-term economic benefits during construction, the Future Proof NPS-UD Housing Development Capacity Assessment[1] identifies no shortfall in housing development capacity across the sub-region. In addition, Council has undertaken extensive strategic planning for Te Kowhai and the surrounding area, including the identification of both existing greenfield zoned land and Future Urban zoned land to accommodate anticipated growth. The proposed project area falls outside these planned growth areas and has not been identified through Council's strategic planning processes as necessary to meet projected demand.

6. Consequently, the infrastructure, servicing, transport, and community facility investments required to support development of the proposed site have not been planned, programmed, or funded. In this context, Council questions whether the proposal aligns with the intent of section 22(1)(b)(i) of the Act and whether the fast-track process would enable the project to proceed more quickly than the normal planning framework, given the substantial planning, infrastructure assessment, and investment still required.

7. The project area includes Highly Productive Land (LUC 2). Its proposed conversion from rural to urban scale use would require careful assessment against the National Policy Statement for Highly Productive Land 2022, including whether the proposal is consistent with the protection of this finite resource.

8. The Future Proof Retirement Living Report[2] (October 2025) identifies that demand for retirement living can largely be met within existing urban areas and established settlements that provide ready access to healthcare, retail, public transport, and community facilities. While Te Kowhai already accommodates a retirement village and demonstrates an existing role in providing for older residents, it is important that any additional development carefully considers these findings. In particular, the proposal should demonstrate how it will integrate with and strengthen the existing community, including supporting access to services, enhancing local connectivity, and enabling social participation.

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

[2] Future Proof Retirement Living Report

9. 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. Existing transport modelling associated with the State Highway 39A and the Waikato Expressway has reflected non-urban land use patterns in this location.

10. Future water and wastewater schemes are planned for parts of Te Kowhai Village. Early and ongoing engagement with IAWAI on potential servicing solutions is encouraged so that there is greater certainty before a substantive application is lodged.

11. Confirmation on water capacity and whether a water take consent is required for the development will need to be determined by IAWAI.

12. The project area is subject to known surface-water ponding and flooding, as shown in image 1. These issues require a catchment-wide response. WDC alongside IAWAI encourage early technical discussions to assess options to deliver a catchment-wide solution that also facilitates the project area development and to involve the Waikato Regional Council who manage the rural drainage system in the locality. If a catchment-wide solutions approach to address the ponding, and flooding issues is not undertaken WDC is unlikely to support the project.

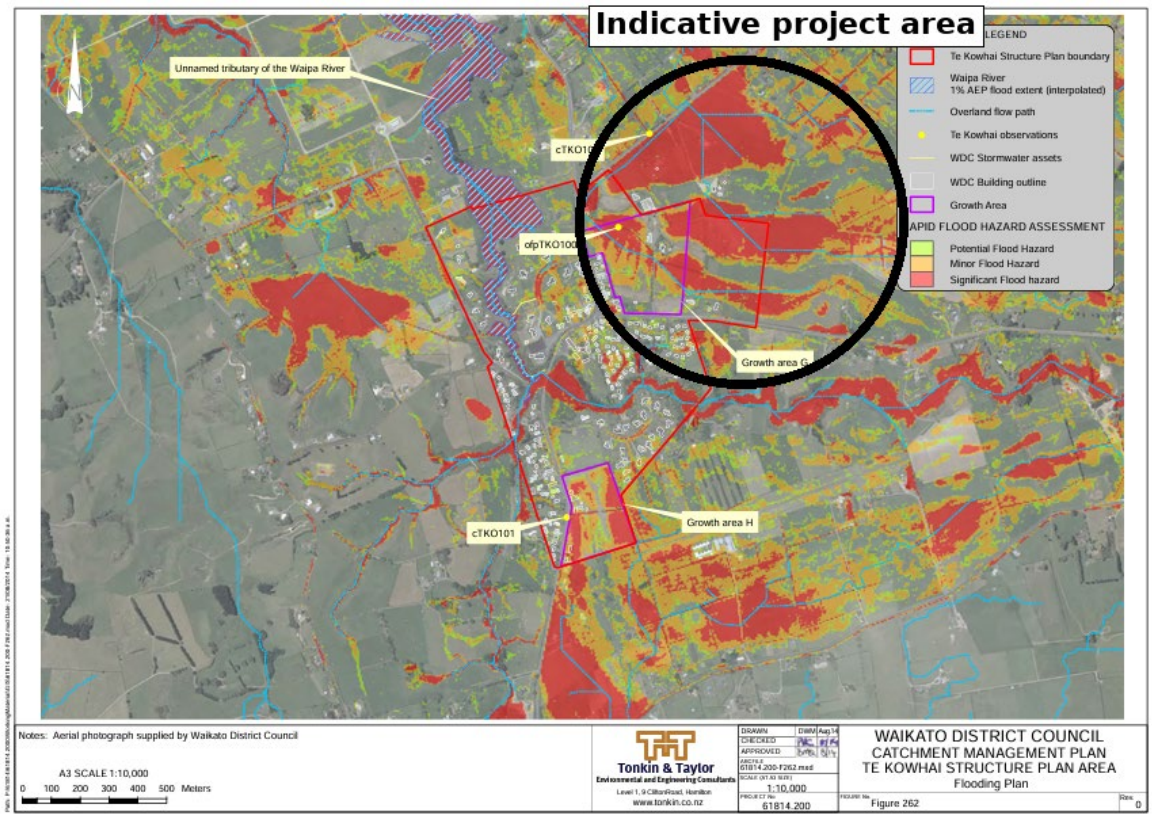


Image 1: Tonkin & Taylor Catchment Management Plan, Appendix E, Te Kowhai Flooding Plan. Link - Catchment Management Plan

13. Stormwater management and design requirements will be critical to this project and should be determined in consultation with WDC and 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.

14. 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.

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

Project name	**Stillhaven**

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 Regional Council		
***First name**	Miffy		
***Last name**	Foley		
Postal address	Private Bag 3038 Waikato Mail Centre Hamilton 3240		
***Contact phone number**	s 9(2)(a)	**Alternative**	
***Email**	s 9(2)(a)		

2. Please provide your comments on this application

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

We note that the referral application is high-level and does not provide sufficient information to provide detailed feedback at this stage.

The comments outlined below are grouped into three 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**);
- An invitation for WRC to consider if the "project may involve an ineligible activity (as defined in section 5 of the Act)" and if "any of the reasons to decline (under section 21(5) of the Act) a referral application may be applicable to this application" (**PART B**);
- Additional comments, under section 17(3)(b) of the Act, relevant to the proposal (**PART C**).

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PART A – SECTION 17(3)(a)

Are there 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?

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

Are there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA?

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

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

PART B - SECTION 5 and 21(5)

Does the project involve an ineligible activity (as defined in section 5 of the Act)?

WRC does not consider that the proposal involves an ineligible activity.

Are any of the reasons to decline (under section 21(5) of the Act) a referral application applicable?

WRC considers that the proposal may be more appropriately addressed under another Act or Acts, for the reasons outlined below.

PART C – SECTION 17(3)(b)

Section 22

WRC provides the following comments to assist the Minister's consideration of the matters set out in section 22(2) of the Act. WRC considers that the criteria of potential relevance to the project are whether the project:

(iii) will increase the supply of housing, addressing housing needs, or contribute to a well-functioning urban environment.
(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.

Housing supply

Residential

The latest Housing and Business Development Capacity Assessment (HBA) (2023), which underpins the Future Proof Strategy, identifies a projected surplus of housing capacity within the Waikato District over the medium term (2022 to 2032). A substantial surplus is also projected over the long term (2022 to 2052) under the *market growth scenario*, which assumes a gradual increase in housing costs and prices over time and is considered the more realistic growth scenario. This indicates that sufficient housing capacity already exists to accommodate anticipated demand.

We note that the application relies on the *current prices scenario*, which is based on 2023 market conditions and does not account for future changes in housing costs and prices. In our view, the market growth scenario provides a more realistic basis for assessing long-term housing demand and capacity.

Furthermore, the HBA identifies substantial existing development capacity within the Waikato District, with between 59,700 and 74,200 of plan-enabled capacity and between 52,700 and 67,900 of infrastructure-serviced capacity over the medium to long term.

Significant additional areas of housing are also proposed through other fast-track projects listed in Schedule 2 of the Act, as well as referred applications, on the periphery of Hamilton. Collectively, these listed and referred projects would provide approximately 394.5 hectares of additional residential land. Given that the Future Proof Strategy already provides sufficient housing capacity to accommodate growth for more than 30 years, there is a risk that further residential development will simply redistribute housing demand. This could undermine the planned growth strategy by diverting demand away from identified growth areas where substantial public infrastructure investment has already been made.

If the proposal were to be referred, any substantive application should address whether there is demand for residential development in this location, in the short, medium and long term.

Retirement living

Future Proof has recently undertaken a review of retirement living options in the Future Proof area[1]. It concludes that there is *no justified exemption for retirement village activities in rural areas* and that *retirement housing should be close to services particularly health and public transport*.

The analysis shows that there are 11 retirement living options in Waikato District, including five independent living villages. There are also a number of retirement living options in Waipā district, including 11 independent living villages.

Further information should be provided as part of any substantive application to demonstrate the level of demand for retirement living in this location.

[1] Final Future Proof Retirement Living Report December 2025.pdf

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Well-functioning urban environment

Te Kowhai is a small rural village in the Waikato district, comprising a small school (roll of around 330 students), community hall and limited retail services. According to Statistics NZ, Te Kowhai had an estimated population of 2,290 in 2025 and 828 private dwellings in 2023[2].

The proposed development would introduce an additional 700 dwellings (excluding the retirement village), increasing the number of homes by almost 85 percent. If including the retirement village, proposed at 200 independent units, this more than doubles the number of homes. This represents a significant increase relative to the size of Te Kowhai, altering the character which is currently that of a small rural village and placing pressure on local services, amenities and infrastructure.

Regional significance and economic benefits

We do not consider the proposed development to be of regional significance. As discussed above, existing housing capacity within the Waikato District is sufficient to meet anticipated demand over the medium and long term. Accordingly, the proposal does not appear necessary to address any identified regional housing capacity deficit or to ensure a competitive housing market.

It is unclear whether the data presented in Table 2-1 of the Economic Assessment represents marginal increases for the short, medium, and long-term or whether it is cumulative. While this may seem a relatively minor point, greater clarity would be helpful, as the interpretation could materially affect perceptions of the urgency and scale of additional housing capacity required.

The discussion of *existing features and constraints* includes reference to existing drainage channels and culverts. As noted in the comments below, the existing drainage infrastructure is designed for a rural level of service. It is important to ensure that consideration has been given to suitable urban drainage infrastructure.

The report states that the proposed development *will complement, rather than compete directly with, existing greenfield developments*. While this could be true if the development is targeting a different market segment, the statement appears somewhat at odds with the broader objectives of increasing housing supply and improving affordability. In general, the benefits of increased supply are most effectively realised where developments operate within a competitive market environment.

The report also states that the development *will expand the Waikato District Council rating base, providing an ongoing source of revenue*. We do not consider this an appropriate justification. While the development would generate additional rates revenue, it would also create ongoing costs, and a development elsewhere in the district would similarly generate both revenues and costs.

Alignment with local or regional planning documents

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.

[2] Te Kōwhai, Place and ethnic group summaries | Stats NZ

The Future Proof Strategy (2024)[3] 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 Future Proof settlement pattern. The settlement pattern is embedded in the Waikato Regional Policy Statement (WRPS).

The Future Proof settlement pattern identifies Te Kōwhai as a *Village Enablement Area*, indicating that only limited growth is expected within the settlement. Consistent with this approach, the Waikato District Growth and Economic Development Strategy 2070[4] identifies two areas for residential growth within Te Kowhai over the medium to long term (10 to 30 years). The proposed site is not located within either of these identified growth areas.

WRC also considers that the proposal does not meet *the out of sequence and unanticipated developments* criteria (APP13) of the WRPS.

Waikato Regional Policy Statement

Te Ture Whaimana o Te Awa o Waikato

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

High class soils and highly productive land

The Land Use Capability Assessment (LUC) indicates that most of the site contains LUC class 2 land. LUC class 2 land is classified as highly productive land under the National Policy Statement for Highly Productive Land 2022 (NPS-HPL), and as such the provisions of the NPS-HPL apply.

We do not agree with the conclusion of the Planning Memorandum that the project is not inconsistent with the NPS-HPL. Further assessment is required to demonstrate how the project meets the exemption pathways.

The LUC report highlights a difference between the regional scale soil information (S-Map) and NZLRI/LUC, with the latter indicating the presence of Organic Soils. The presence of Organic Soils (or peat) could have important implications for engineering and infrastructure design and cost. Peat soils are known to subside over time, with current regional estimates of 2 cm per year on average. We agree that on-site soil profile assessments are required to confirm the presence or absence of Organic Soils.

Ecology

The Ecological Assessment indicates the presence of a potential natural inland wetland, and natural and/or modified watercourses. Any substantive application must demonstrate how the

[3] Our strategic direction | Future Proof

[4] waikato-2070.pdf

proposal meets the relevant clauses of the National Policy Statement for Freshwater Management (NPS-FM) and National Environmental Standards for Freshwater (NES-F).

A detailed Ecological Impact Assessment is required to accompany any substantive application.

Wetlands

WRC recommends the following information:

- Identification of any wetlands, including vegetation species and dominance, hydrology and soil characteristics.
- Delineation and mapping of wetland boundaries.
- Assessment of wetland values.
- How adverse effects will be avoided.
- Whether the proposed works will result in impacts on, or the removal of, any wetland areas.
- Details of proposed offsetting and/or compensation.

Terrestrial ecology

The Ecological Assessment identifies potential bat, avifauna and herpetofauna habitat. WRC recommends the following information:

- Historical evidence of species present.
- Consideration of post-construction effects e.g. increased pest predators and effects of lighting.
- Species surveys.
- Habitat identification.

Freshwater ecology

Further detailed assessments should consider the habitat protection requirements for any species at risk found within these watercourses, consistent with the WRPS.

Black mudfish are known to be present in the vicinity of the site and could be adversely affected by the proposed development. Appropriate mitigation measures would be required to address habitat loss and any translocations. The Ecological Assessment also refers to brown mudfish; however, this species does not occur in the Waikato region.

Land drainage and flooding

The site is located within the Central Waikato Drainage District and contains a number of WRC managed drains. These drains are currently maintained and managed by WRC to a rural level of service – to prevent loss of pasture through drainage of ponded water within 3 days up to the 10-year storm (10% ARI; average return interval). The drains are open, allowing for stormwater to overflow and pond on the pasture until it drains away. Culverts within the network are the responsibility of the private landowners, territorial authorities or roading manager. The rural level of service is not suited to an urbanised area.

Should the site be developed for urban purposes, WRC would be unable to manage these assets to an urban standard. In that event, ownership and management of these assets would be expected to transfer to the relevant territorial authority.

Where current WRC drains extend beyond the site, the proposed development should not alter the functioning of those drains, reduce current levels of service, or impact WRC's ability to access and maintain them.

The applicant should refer to WRC's stormwater management guidelines: https://www.waikatoregion.govt.nz/assets/WRC/TR20-07.pdf

There are known flooding issues within the existing Te Kowhai village. The proposed development should not exacerbate those issues. The referral application does not address the hazard risk or how an increase in impermeable surfaces will impact the surrounding land.

As part of any substantive application, a comprehensive Flood Hazard Assessment is required.

Transport

We note that while the Transport Overview provides a useful high-level summary, there are several matters that would benefit from further assessment:

- Alignment with the Metro Spatial Plan (MSP) and wider strategic growth and transport planning assumptions.
- Future travel behaviour and mode shift assumptions, including the expected role of public transport, walking and cycling in reducing vehicle dependence.
- The transport needs of retirement village residents, aged care users and other transport disadvantaged groups.
- Construction traffic effects, including heavy vehicle movements, haul routes and construction traffic management.
- Road safety impacts, including increased traffic on the surrounding road network, interactions with heavy vehicles, effects on vulnerable road users, safety at key intersections, and construction related safety risks.

We recommend a comprehensive Integrated Transport Assessment to support any substantive application.

Other relevant considerations

Contaminated land and acid sulphate soils

We note that the investigation completed to date is preliminary, and there is still uncertainty regarding the nature and extent of any contamination present. The Preliminary Site Investigation (PSI) identifies several actual and potential HAIL activities and recommends a Detailed Site Investigation. The hydrogeological assessment identifies shallow groundwater, hydraulic connectivity with drains and surface water features, and potential interactions with wetlands, raising the potential for contaminant mobilisation.

Given the proposed residential and retirement village development, together with the above hydrological features, consideration should be given to:

- The nature and extent of any soil contamination.
- The potential for groundwater contamination.
- Potential contaminant migration pathways to drains, wetlands and surface water bodies.

- Management of any contaminated soils encountered during bulk earthworks.
- Any remediation, validation and long-term management measures that may be required.

In addition, Council's Acid Sulfate Soil Probability mapping indicates that the site is located within an area of high probability for acid sulfate soils. Given the scale of the proposed earthworks and the site's hydrological characteristics, an assessment of the potential presence of acid sulfate soils and any associated management requirement is required.

Stormwater

A key issue not addressed in the high-level documents is how the substantial increase in stormwater runoff from impervious surfaces will be managed. The receiving watercourses and rural drains do not have natural capacity, nor are they currently designed to accommodate increased flows, creating a risk of extensive flooding and erosion. Given the area's high groundwater levels, stormwater volume reduction will be critical. While the application refers to managing stormwater for water quality and peak flow attenuation, it does not address volume retention. Soakage is not a likely viable option in this catchment and on-lot retention is unlikely to meet the initial abstraction requirements (IA).

Current stormwater management within the Te Kowhai residential area is compromised at times during intense rainfall events with flooding occurring on residential streets and on properties. The addition of this development has the potential to compromise the system further and impact on infrastructure and private properties. The applicant has not demonstrated how this issue will be managed to avoid these adverse effects.

The proposal will require a number of resource consents under the Waikato Regional Plan to mitigate potential adverse effects. The specific consent requirements for stormwater can be assessed once further information is available.

Water supply

The Hydrogeological Memorandum lists two potential options for water supply: groundwater taken via bores to be constructed on-site; and connection to the reticulated water supply network operated by IAWAI. The Infrastructure Memorandum identifies connection to the IAWAI reticulated water supply network as the preferred water supply option. It notes that water from two existing on-site bores could provide an interim supply and be used for dust suppression during construction. The Planning Memorandum indicates that the final water supply solution will be confirmed through detailed design at the substantive application stage.

We note that daily and annual water volumes for both the construction and development have not been identified in the referral application.

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.

The site is located within the Waipā Groundwater Management Area. Based on current allocation levels, sufficient allocation is likely to be available for a groundwater take consistent with the indicative scale of the development. Groundwater abstracted from the site would be hydraulically connected to the Waipā and Waikato Rivers and therefore needs to be, and is, accounted for in WRC’s surface water allocation system.

As at 2 September 2026, cumulative allocation levels for the relevant Waipā River and Waikato River mainstem catchments remain within their respective primary allocable flow across all months of the year.

With a grant of either a groundwater take or surface water take consent, for the volume commensurate with the indicative scale of the development, water will remain available for allocation within each catchment's primary allocable flow across all months of the year.

The proposal will require a number of resource consents under the Waikato Regional Plan associated with water supply for domestic use and dust suppression purposes. The specific consent requirements for water supply can be assessed once further information is available.

Wastewater

For wastewater servicing and discharge, the application lists two options; connection to a public network, or connection to a decentralised system. Connection to Waikato District's sewer network is WRC's preferred option.

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 particularly given the high groundwater table identified within the area

The proposal will require resource consent under the Waikato Regional Plan associated with any decentralised wastewater system. The specific consent requirements for wastewater disposal can be assessed once further information is available.

Earthworks

Earthworks should 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 proposal will require resource consent under the Waikato Regional Plan associated with earthworks associated with the development of the site. The specific consent requirements for the earthworks can be assessed once further information is available.

Summary of Issues for Waikato Regional Council

WRC considers that the proposal may be more appropriately addressed under another Act or Acts, for the following reasons:

1. The site is not identified for future urban growth in either the Future Proof Strategy or the Waikato District Growth and Economic Development Strategy.
2. The proposal is unanticipated and does not meet the unanticipated developments' criteria under Policy APP13 of the WRPS.

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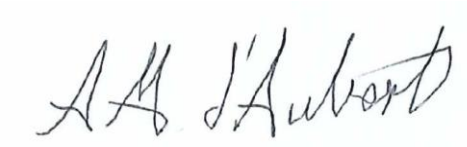
3. The application has not demonstrated that the proposal would contribute to a well-functioning urban environment, consistent with the requirements of the NPS-UD.
4. Insufficient evidence has been provided to demonstrate a need for additional retirement living capacity within the district.
5. The site comprises highly productive land under the NPS-HPL.
6. The site is subject to significant drainage and flood management constraints.

If the proposal is referred, WRC request that the following information is provided within the substantive application:

1. Demonstrates how the proposal meets the WRPS, Future Proof Strategy and Waikato District Growth and Economic Development Strategy.
2. Demonstrates the demand for retirement living and residential in this location, in the short, medium and long-term.
3. Provision of a Flood Hazard Assessment.
4. A detailed Integrated Transport Assessment.
5. A detailed Contaminated Site Management Plan and Acid Sulphate Soils Investigation.
6. A detailed assessment of the relevant provisions of the WRPS, NPS-HPL, NPS-FM and NES-F.
7. A detailed Ecological Impact Assessment.
8. Details of the proposed water supply, stormwater disposal, wastewater treatment and discharge systems, and if they are standalone proposals – who will operate, maintain and manage the systems.
9. Details of how the proposal will address the potential effects on the Central Waikato Drainage District managed drains.
10. Confirmation of the consents to be sought for each activity.
11. 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** 16 September 2026