Memorandum

B&A Urban & Environmental

To: Ben Bond – Environmental Protection Authority

From: Fraser McNutt and Sam Le Heron – Barker & Associates Limited

Date: 12 October 2026

Re: Request for further information - Fast-track Approvals Act 2024 - FTAA-2609-1294 - Southern Links 1

1.0 Introduction and Purpose

Golden Ridge Farm Limited, Golden Ridge Park Limited, Industre Property Rua Limited, and Southpark Agri Development Limited (together, the Applicants) lodged a substantive application under the Fast-track Approvals Act 2024 (the Act) on 11 September 2026 seeking approvals for Southern Links 1 (the Project or the Application). The Project is a listed project under Schedule 2 of the Act.

On 24 September 2026, the Environmental Protection Authority (EPA) wrote to the Applicants making a request for further information (RFI) to assist the EPA in assessing the completeness and scope of the Application. As outlined in the RFI, before referring a substantive application to an Expert Panel, the EPA is required to assess whether the application is complete and complies with the requirements of section 46(2) of the Act. In undertaking this assessment, section 46(2A) of the Act enables the EPA to seek further information from an applicant where required.

The Applicants have considered the matters raised in the RFI and provide the following information and clarification in response to each of the matters identified in the table below.

This information is provided to assist the EPA in completing its assessment of the Application and determining whether the requirements of section 46(2) of the Act have been satisfied.

2.0 Response to Matters Raised by the EPA

Request Item	Detail	Response
1. Hamilton City Council Operative District Plan Assessment	This request was raised as part of the mandatory consultation the EPA undertook with Hamilton City Council. *While the Application area is largely within the Waipa District, small parts of the site are within the plan area of Hamilton City Council. Please provide an assessment of the Application against any relevant chapters / provisions of the Operative Hamilton District Plan (OHPD) pursuant to Schedule 5, Clause (2) of the FTAA.*	Refer to **Attachment 1** – HCC Objectives and Policies Assessment. The Application included an assessment against Chapter 2 – Strategic Framework for the Residential South site. For completeness, Attachment 1 updates that assessment, extends it to the Industrial North site and addresses the other relevant chapters. A targeted assessment of the relevant HCC ODP objectives and policies has been undertaken, reflecting the limited extent of the Project within Hamilton City. The assessment addresses the relevant Chapter 25.14 –Transportation provisions

		associated with the proposed road connections, wider transportation considerations, together with relevant higher order provisions in Chapter 2 – Strategic Framework. The assessment also addresses the relevant Chapter 20 – Natural Environments considerations in relation to notable trees. This is consistent with section 44 of the Act which states that "*Information required by Section 43 must be specified in sufficient detail to satisfy the purpose for which it is required",* which in this case is a limited purpose e.g. to understand the transport connections and wider transport chapter, the strategic framework and notable tree removals.
2. Notable Tree and Street Tree Assessment	This request was raised as part of the mandatory consultation the EPA undertook with Hamilton City Council. *Further, HCC has identified that the recommended transport interventions contained in Appendix 16 – Integrated Transport Assessment – Concept Plans, will result in the removal of numerous trees scheduled in the OHDP, along with numerous other street trees being affected. The application omits a OHDP assessment in relation to the removal of these trees, nor does it contain an assessment of effects relating to this activity.* *Please provide an assessment addressing these matters raised by HCC pursuant to Schedule 5, Clause 7(b) of the FTAA.*	Refer to **Section 2.1** below for an assessment of Notable Trees and Street Trees. The planning response identifies any specific notable tree proposed to be removed and captures more broadly any relevant street trees proposed to be removed as part of wider infrastructure works to support the Project. It confirms that the loss of two notable trees is likely to be unavoidable within the associated works and outlines the proposed compensatory measures. An updated assessment of effects as it relates to the scheduled tree and street tree removals has been undertaken. That assessment concludes that the removal of T256 and T257 will result in the permanent loss of two mature notable English Oak trees, together with other trees within the E82 designation and the wider local transport corridor environment. The adverse effects will be most evident in the immediate vicinity of the notable tree removals, once removal has occurred, and during the period before any replacement planting establishes. However, the transportation improvements are necessary to provide a safe and functional supporting upgrade for the Ohaupo Road corridor to benefit the E82 Designation and wider HCC network. Any notable tree effects will be addressed through replacement planting, arboricultural controls, documentation of the existing

		trees and reuse of salvaged timber where practicable. On that basis, the removal of T256 and T257 is broadly consistent with the notable tree provisions of Chapter 20 of the HCC ODP, and the adverse effects are considered acceptable, subject to the proposed mitigation and consent conditions. Regarding the Street Trees, which are considered separately under the Hamilton Street Trees Policy, the removal, which will tie to staging of infrastructure and upgrades to support the Project, will result in a reduction in established canopy and streetscape amenity where those removals are occurring. The full extent of the street trees will be addressed through a coordinated replacement planting programme, where a condition of consent will include the development of a replacement planting plan once final detailed design and any street tree removal is formally identified. Importantly, these street trees sit outside the District Plan (not notable trees), with the HCC Tree Policy prevailing. Consistent with the Policy, at least two new trees will be provided for each Council tree removed, with final species, locations, grades and establishment requirements agreed with Council. Replacement planting will be integrated with the road, reserves, stormwater areas and public-realm network to establish a resilient long-term canopy. Overall, the proposal is considered consistent with the Tree Policy because alternative retention options have been considered, removal is limited to trees that conflict with necessary urbanisation works, and the loss will be mitigated through Council-approved replacement planting.
3. Traffic and Amenity Effects	This request was raised as part of the mandatory consultation the EPA undertook with Hamilton City Council. *HCC has expressed concern in relation to the information given about traffic and amenity effects associated with significant ongoing operational*	As outlined in the Application, including the Volume 1 Overview Report, Volume 2 Assessment of Environmental Effects Residential South and Volume 3 Assessment of Environmental Effects Industrial North, no permanent wastewater truck movements were proposed or assessed. The wastewater

	wastewater truck movements, in the instance that a reticulated wastewater servicing option is not available. HCC has commented "Regardless of whether alternative infrastructure solutions are otherwise acceptable or not, no assessment has been provided of the traffic and amenity effects on existing local residents from significant ongoing operational wastewater truck movements" *Please provide an assessment addressing this matter raised by HCC pursuant to Schedule 5, Clause 7(a) of the FTAA.*	servicing solutions for Residential South and Industrial North include connections to the reticulated network, and alternative options as outlined in the respective reports. Should any interim wastewater trucking solution be presented, conditioned or included as part of the Application via panel consideration, the duration and extent of this would be temporary. Should a temporary wastewater trucking approach be included as an interim arrangement for the residential and/or industrial activities, given the very limited number of movements, primary use of existing urban roads and temporary duration of the activity, any effects are expected to be negligible. The effects would be monitored through records of tanker movements, collection times, routes, complaints and any operational incidents. A material increase above any condition duration or frequency, would trigger a review of conditions of consent. Any temporary wastewater truck movements, if considered and included as part of Panel consideration, would be appropriately conditioned and built into a wastewater trucking management plan to be certified prior to implementation and associated with each land use consents. Overall, provided an appropriate condition and Wastewater Trucking Management Plan is implemented, the environmental effects of the interim trucking arrangement are expected to be temporary, localised and no more than minor. See further assessment in **Section 2.3** below.
4. Transport Components	This request was raised as part of the mandatory consultation the EPA undertook with Hamilton City Council. *HCC has expressed concerns regarding a lack of information in relation to some of the transport elements of the proposal, including:* *"Ohaupo Rd / Lambert Court signalised intersection required for SL1*	Refer to **Attachment 2 – Transportation Matters and Response**, which responds to the points raised and reaffirms the completeness of the ITA and supporting appendices. Attachment 2 concludes that the ITA adequately; • Assesses the proposed Ohaupo Road / Lambert Court signalised intersection at a level sufficient to

	Residential, particularly where important aspects of the proposed mitigation appear to be deferred to future detailed design. *Industrial North Interim Option B and the transition from the interim access arrangement to the ultimate HSL network configuration.* *The role and timing of the proposed future minor arterial road connection and its relationship to later development stages."* Please provide any further information you wish to have considered in response to these comments by HCC.	understand its operation and effectiveness. • Demonstrates that Interim Option B provides a feasible interim Industrial Development access solution that remains compatible with future HSL delivery. • Explains the role and staged delivery of the future minor arterial corridor. • Clearly identifies the 543-dwelling threshold as a transport reassessment trigger rather than a permanent development limit.
5. Scope and Consistency with Listed Project Description	This request was raised as part of the mandatory consultation the EPA undertook with Hamilton City Council and Waipa District Council. *HCC and Waipa District Council have expressed concern with the project scope, outlining that:* *The Southern Links 1 application was listed in the FTAA for the approximately 1035 residential allotments and for 66 hectares of industrial activity, while the Southern Links 1 substantive application has been lodged for 938 residential lots and 60 hectares of industrial activity.* *The application documents discuss the reliance on Hamilton Southern Links (HSL) and implications to this development. In the absence of HSL, the transport assessment imposes an effective cap of 543 dwellings and raises questions about how access to SL1 Industrial would be funded. This represents a 46% reduction from the 1,035 dwellings on which the decision to list the project was based.* *Reducing the scope to this extent will increase the likelihood that the original national or regional benefits that merited listing will not materialise and will not outweigh the adverse environmental effects of the proposal.*	Refer to **Attachment 3 - Legal Memorandum - Scope** and see also **Section 2.2** below.

	Please provide any further information you wish to have considered in response to these comments from HCC and Waipa District Council.	

2.1 Notable Trees and Street Trees

Notable Trees

The Project involves the removal of two notable trees identified in the Hamilton City Council Operative District Plan (HCC ODP) as:

T256 — English Oak (*Quercus robur*); and

T257 — English Oak (*Quercus robur*).

Both notable trees are within the E82 NZTA designation corridor for Ohaupo Road. The Applicants acknowledge that s176 Approval will be required from NZTA prior to upgraded works within the Ohaupo Road corridor, within the E82 Designation, including the removal of two notable trees, should that be required.

The Integrated Transport Assessment (ITA) that was provided with the Application (Appendix 16 – Residential South) identified several transportation improvements within the immediate and wider surrounding network that are required to support the staged and phased development of the Project. For the Residential South component of the Project this includes works within the Ohaupo Road corridor.

The V2 Appendix 16 ITA – Concept Plans, submitted with the Application titled '*Concept Design Ohaupo Road / Resthill Crescent Intersection Upgrade*', identify road widening within the Ohaupo Road corridor to facilitate wider improvements, including the implementation of an upgraded Ohaupo Road / Resthill Crescent intersection. The ITA confirms this is required prior to Stage 2 (i.e. beyond 543 dwellings). Therefore, although the Application includes the upgraded Ohaupo Road / Resthill Crescent intersection, the actual physical works will not be undertaken for some time.

Based on the concept plan, it is likely that both T256 and T257 will require removal to facilitate the implementation of the proposed concept plan and transport improvements.

The notable trees are protected under the HCC ODP, and their removal requires resource consent as a Discretionary Activity under Rule 20.3aa. *Non-emergency works to, removal of, or transplanting of a Notable Tree – Discretionary*. Accordingly, the Application seeks to include the removal of T256 and T257, within the approvals being sought, and a supporting effects assessment is outlined below.

The trees are located within the Ohaupo Road E82 designation (administered by New Zealand Transport Agency) and are likely to be removed to facilitate transportation improvements associated with the proposed Residential South component of the Project, as outlined in '*Concept Design Ohaupo Road / Resthill Crescent Intersection Upgrade*', within Appendix 16 – Residential South. The relevant works include road widening, intersection works, footpath and cycle facilities and visibility improvements.

The transportation improvements are required to provide a safe and appropriately designed connection between the development and the surrounding transport network once development goes beyond the 543-dwelling reassessment proposed. The trees are located within, or sufficiently close to, the required construction footprint such that retaining them, if possible, would likely result in significant instability with works proposed within the root protection zone and trunk locations.

This assessment addresses the effects arising specifically from the removal of T256 and T257. It should be read alongside the original V2 Planning Assessment of Environmental Effects and ITA.

District Plan context

Schedule 9D of the Hamilton District Plan identifies trees considered to have special community value or to be outstanding specimen examples worthy of protection. Non-emergency works to, removal of, or transplantation of a scheduled tree are identified as a discretionary activity under Chapter 20 of the HCC OPD.

Objective 20.2.4 seeks to protect and maintain the values of significant trees. The associated policies require consideration of:

- the particular factors and values for which each tree is scheduled;
- the character of the surrounding area, including the streetscape and public realm;
- effects on the health of the trees;
- activities within their root protection zones;
- alternatives to removal;
- advice from a suitably qualified arborist; and
- replacement planting or other measures to remedy or mitigate the loss.

The policies in the urban context, which the Ohaupo Road corridor relates, only contemplate removal where alternatives have been exhausted, and any removal can be mitigated by replacement planting. Where removal cannot be avoided, the loss of value is to be appropriately remedied or mitigated. An assessment against the relevant Objective and Policies of Chapter 20, Natural Environment is included in Attachment 1, however overall, the SL1 Residential South Project is considered broadly consistent with the Chapter 20, Natural Environment, where the transportation improvements are necessary to provide a safe and functional supporting upgrade for the Ohaupo Road corridor to benefit the E82 Designation and wider HCC network. Any notable tree effects will be addressed through replacement planting, arboricultural controls, documentation of the existing trees and reuse of salvaged timber where practicable.

Existing environment and tree values

T256 and T257 are mature English Oak trees located within the Ohaupo Road E82 NZTA designation. The HCC ODP records the purpose of the E82 designation as:

To manage the State highway system, including planning, funding, design, supervision, construction, and maintenance and operations, and improvements in accordance with the Land Transport Act 2003 and the Government Roading Powers Act 1989.

The purpose of the E82 designation and the proposed transportation improvements are important context when considering the alignment of the proposed works and the underlying purpose of the E82 designation. The NZTA designation forms an important component of the existing environment. Notwithstanding this, a detailed assessment of the effects of the removal of the two notable trees is outlined below.

An arboricultural assessment has not been commissioned at this stage. The concept plans show that the works will likely require the removal of the trees, and the proposed conditions require a suitably qualified arborist to certify, before removal, that the works cannot be undertaken while retaining the trees in a safe and viable condition. A compensatory approach is therefore proposed to address residual effects, should removal be required to implement the transportation improvements.

As mature trees, T256 and T257 contribute to the established vegetated character of the surrounding residential and business zoning. Their principal values include:

- visual prominence and contribution to the streetscape;
- mature scale, form and canopy cover; and
- potential for habitat and foraging opportunities for common urban fauna.

The trees are exotic specimens and do not themselves constitute indigenous vegetation. Their ecological significance is therefore principally associated with their function as mature urban trees rather than the protection of indigenous botanical values. Nevertheless, their notable status means that their amenity, require specific consideration and cannot be discounted solely because they are exotic species.

Necessity for removal

The proposed transportation works require the relevant works are outlined in Appendix 16, *Concept Design Ohaupo Road / Resthill Crescent Intersection Upgrade,* and include road widening, intersection works, footpath and cycle facilities and visibility improvements through the area presently occupied by T256 and T257 and their root protection zones.

BBO has advised that the physical works required including, but not limited to, excavation, pavement construction and level changes would likely remove or damage a substantial proportion of the trees' structural roots, based on the Appendix 16 Concept Plans. The proposed improvements are part of the wider Ohaupo Road improvements expected to be implemented in a phased manner as a move to bus priority, pedestrian and active mode priority and safety and efficiency is prioritised within this key corridor. The Metro Spatial Plan identifies this corridor as an important bus priority corridor, and ongoing input from HCC and WRC reinforces the likely future role of Ohaupo Road for bus priority. The proposed transportation improvements are aligned with this wider focus.

Attempting to retain the notable trees while constructing the proposed improvements would therefore likely result in:

- substantial and irreversible root loss;
- compromised tree health and long-term structural stability;
- an increased risk of branch or whole-tree failure;
- the trees being left in a declining condition immediately adjoining a road or pedestrian area; and/or
- an inability to construct the transportation improvements to the preferred or required geometric and safety standards.

On that basis, nominal retention of the trunks while undertaking extensive works within the root protection zones would not provide a satisfactory environmental outcome. It would likely defer, rather than avoid, the loss of the trees and could create an unacceptable safety and maintenance risk.

Alternatives considered

The following alternatives have been assessed through the design process:

Retention of both trees

Retention of both trees would require a less optimal transportation configuration and network improvements that may not deliver on the safety and efficiency requirements within the Ohaupo Road corridor. It is noted that the trees are located with the NZTA designation with consequences on their long-term retention irrespective of the Project.

This option has not been adopted because it would likely not achieve the safety, efficiency and overall network performance aspects required to support the transportation improvements, for both the Residential South development, and delivering on wider network improvements in the Ohaupo Road corridor which would significantly benefit the E82 designation corridor and wider HCC network.

As part of detailed design and engineering approval, at the point in time when the improvements are required, a more detailed assessment of the physical works, exact location and any impact on the notable trees will be undertaken. This can and should be appropriately conditioned to ensure the notable tree removal only occurs if required, and if demonstrated to be necessary to support the proposed works and with appropriate mitigation implemented.

Retention of one tree

BBO has considered whether the transportation works could be reconfigured to retain either T256 or T257. The existing road and parcel boundaries mean that retaining one tree would still likely require material works within its root protection zone. It would be expected that works within the root protection zone would not provide for the viable long-term retention of the remaining tree.

Reduced construction footprint

Options involving a reduced carriageway, footpath or berm width have been considered. These options would not deliver the required safety and efficiency outcomes necessitated by the corridor improvements proposed, where the improvements are contributing to a future focused Ohaupo Road. A reduced construction footprint may still involve works within the root protection zone and compromise the integrity of the two notable trees. The Appendix 16 – Residential South ITA has considered the improvements and alternatives as part of the detailed transport assessment.

Root-sensitive construction

Bridging, permeable pavement and no-dig construction techniques have been considered. These methods can reduce impacts where works affect only the outer portion of a root protection zone. In this case, however, the works extend through the area occupied by the trees and their root protection zones, so root-sensitive construction would not avoid material damage.

Overall, the alternatives assessment demonstrates that the transportation design has been refined to avoid notable tree removal where reasonably practicable. There is no reasonably available alternative that would retain T256 and T257 in a safe and viable condition while also delivering the necessary transport outcomes and the intent underlying strategic intent of the E82 Designation.

Positive effects

The removal of T256 and T257 will enable the delivery of transportation improvements that will support the safe and efficient operation of the wider Ohaupo Road transportation network and facilitate residential development and surrounding network. The positive effects include:

- safe vehicle access to and from the development;
- appropriate intersection geometry and visibility;
- safer provision for pedestrians and, where applicable, cyclists;
- integration of the development with the existing street network;
- reduced potential for vehicle conflict or unsafe turning movements;
- improved accessibility for residents, visitors, service vehicles and emergency services;
- enabling additional residential capacity and housing choice; and
- providing strategic improvements that align with the wider network hierarchy

These benefits are relevant when considering the proposal as a whole and whether the overall effects are acceptable.

Landscape, visual and amenity effects

The proposed transportation improvements within the Ohaupo Road corridor will require the removal of several trees, including the notable trees T256 and T257 and other existing street trees,. The landscape, visual and amenity effects of these tree removals will be visible in the immediate roading environment, however, are not out of keeping with the intent of the E82 NZTA designation and road corridor. More recent upgrades within the corridor have included shared paths, widening and in lane bus provisions, which reflect the changing environment as this key corridor continues to receive investment and improvements. The existing vegetation and trees on the northern side of Ohaupo Road assist in visual screening between the adjoining residential and road corridor, and there is the ability to continue to manage this interface and screening with appropriate planting outcomes.

A replacement planting programme is proposed as a condition of consent (see below), with the planting plan to be prepared through the detailed design and engineering approval process. Subject to those measures, the residual landscape and visual effects are expected to be managed in the context of the road corridor and underlying transport zoning.

Ecological effects

English Oak is an exotic species, and neither tree represents indigenous botanical habitat. Removal will nevertheless result in the loss of mature canopy and potential habitat used by common urban birds.

Before removal, each tree should be inspected by a suitably qualified ecologist for:

- active bird nests;
- cavities or features capable of supporting roosting fauna; and
- other evidence of protected wildlife.

Tree removal should, where practicable, occur outside the principal bird-nesting season. If an active native bird nest of a protected species is identified, works should cease within an appropriate exclusion area until the nest is no longer active or the works are otherwise authorised.

With pre-felling inspections and a replacement planting programme, the ecological effects are assessed as negligible.

Historic and community values

The scheduling of T256 and T257 indicates that the trees possess primarily botanical and amenity value. Their removal will permanently eliminate these values.

The effect can nevertheless be acknowledged and partially remedied by:

- obtaining a photographic record of the trees and their setting before removal;
- recording their dimensions, condition and relevant historical information;
- salvaging suitable timber for reuse in public seating, landscape features or other suitable purposes within the wider SL1 Residential South reserves;
- planting successor English Oaks or another heritage-appropriate species in locations capable of accommodating their mature dimensions, such as within the Residential South subject site, or nearby Council reserve or park closer to Ohaupo Road.

These measures will preserve a record of the trees and maintain a tangible connection with their former presence.

Proposed mitigation and consent conditions

The following measures are proposed:

- T256 and T257 shall not be removed until the final detailed design transportation drawings and landscape plan have been certified by Hamilton City Council.
- Before removal, the consent holder shall provide certification from a suitably qualified arborist confirming that the approved transportation works cannot be undertaken while retaining the trees in a safe and viable condition.
- The trees shall be photographed and their species, dimensions and condition recorded.
- A pre-felling inspection shall be undertaken by a suitably qualified ecologist for active native bird nests and roosts.
- Removal shall be undertaken by a suitably qualified arborist in accordance with accepted arboricultural practice.
- Replacement planting shall be undertaken at a minimum ratio of 2:1, comprising no fewer than 4 large-canopy trees within the wider SL1 Residential South site, or nearby Council reserve or park.
- Replacement species and locations shall be approved by Hamilton City Council and shall be capable of achieving long-term canopy cover without creating conflict with transport infrastructure or services.
- Replacement trees shall be planted in the first suitable planting season following certification of the landscape plan and Ohaupo Road intersection / upgrade plan certification, identified in the BBO Appendix 16 drawings, are prior to notable tree removal.
- Suitable timber from T256 and T257 shall, where practicable, be salvaged for reuse within the development or donated for community use.
- Prior to removal of T256 or T257 notable trees or street tree removal, the Applicants shall prepare a tree planting programme plan for tree replacements to be certified by Hamilton City Council, Parks and Reserves Unit Director or representative. The purpose of this plan is:
    - Determine the offset ratio for replacement planting for Notable Tree removal
    - Determine the offset ratio for replacement planting for street tree removal
    - Identify the location(s) of offset replacement planting, the species, size to support healthy tree growth.

Conclusion

Removal of T256 and T257 will result in the permanent loss of two mature notable English Oak trees, together with other trees within the E82 designation. The adverse effects will be most evident in the immediate vicinity once removal has occurred, and during the period before any replacement planting establishes.

However, the transportation improvements are necessary to provide a safe and functional supporting upgrade for the Ohaupo Road corridor to benefit the E82 Designation and wider HCC network. Any notable tree effects will be addressed through replacement planting, arboricultural controls, documentation of the existing trees and reuse of salvaged timber where practicable.

On that basis, the removal of T256 and T257 is broadly consistent with the notable tree provisions of Chapter 20 of the HCC ODP, and any adverse effects are considered acceptable, subject to the proposed mitigation and consent conditions.

Street Tree (Hamilton City Council Policy)

The proposal requires the removal of several Council-owned street trees to facilitate the comprehensive urbanisation of the transport corridor associated with the wider master-planned residential development, including facilitating access onto Saxbys Road, wider shared path implementation and localised intersection improvements.

The Policy is distinct from the District Plan controls applying to notable trees listed in Schedule 9D of the HCC ODP.

The relevant Tree Policy requirements include:

- Council should be notified at the early stages of development design where works could affect a Council-owned tree;
- an Application for Tree Owner Approval must be submitted before works or removal;
- good-quality mature trees should be retained wherever reasonably practicable;
- Council may consider removal to facilitate an activity or development on a case-by-case basis where no suitable alternative design option is available;
- removal approval is subject to tree-replacement requirements;
- at least two new trees are required for every Council tree removed for development;
- the applicant is responsible for Council's calculated replacement and establishment costs; and
- an ecological assessment may be required where trees are likely to contain protected indigenous fauna.

Hamilton City Council's Tree Policy treats Council-owned trees as important long-term public assets. Removal to facilitate development may be considered on a case-by-case basis where no suitable alternative design option is available.

The project design has considered options to limit the potential effects of street tree removal, however, as part of wider master planned development there are localised areas where affected trees are proposed to be removed. The proposed removal supports a comprehensive master planned residential development, Southern Links 1 Residential South, and any street trees removed are to support infrastructure upgrades and connectivity, with improvements that will also benefit the wider community.

The removal, which will tie to staging of infrastructure and upgrades, will result in a reduction in established canopy and streetscape amenity where those removals are occurring. The full extent of the street trees will be addressed through a coordinated replacement planting programme, where a condition of consent will include the development of a replacement planting plan once final detailed design and any street tree removal is identified. Importantly, these street trees sit outside the District Plan (not notable trees), with the HCC Tree Policy prevailing. Consistent with the Policy, at least two new trees will be provided for each Council tree removed, with final species, locations, grades and establishment requirements agreed with Council, as part of the tree planting programme plan. Replacement planting will be integrated with the road, reserves, stormwater areas and public-realm network to establish a resilient long-term canopy.

The affected trees will be inspected for potential protected-fauna habitat before removal, with an ecological assessment provided where required. Removal will be undertaken by a suitably qualified arborist and subject to appropriate traffic, safety and retained-tree protection measures.

Overall, the proposal is considered consistent with the Tree Policy because alternative retention options have been considered, removal is limited to trees that conflict with necessary urbanisation works, and the loss will be mitigated through Council-approved replacement planting.

Hamilton City Council, including the Parks and Reserves group as the owner of street trees within Hamilton jurisdiction, was consulted during pre-lodgement engagement as part of the wider master plan development, not specifically in relation to the street tree policy. Notwithstanding this, the Applicants will continue to engage with the Parks and Reserves group, particularly on replacement planting locations and species.

2.2 Traffic and Amenity Effects

As outlined in the Application, including the Volume 1 Overview Report, Volume 2 Assessment of Environmental Effects Residential South and Volume 3 Assessment of Environmental Effects Industrial North, and supporting specialist infrastructure reports from Maven, no permanent wastewater truck movements are proposed. The wastewater servicing solutions for both the Residential South and Industrial North components of the Project include connections to the reticulated network, and alternative options as outlined in the respective reports. Should any interim wastewater trucking solution be presented, conditioned or included as part of the Application via panel consideration, the duration and extent of this would be temporary. Notwithstanding this, a high-level effects assessment is provided to support the consideration of a temporary wastewater trucking solution, should that be conditioned or included as part of the Application via panel consideration.

As an interim servicing measure, wastewater generated by the residential and industrial activities could be collected in appropriately designed storage facilities and transported by sealed tanker to an authorised wastewater treatment facility, likely the Cambridge Treatment Plant, like the Hamilton Airport current servicing approach. This servicing arrangement, if conditioned or included as part of the Application (which it currently is not) would operate only until the permanent wastewater servicing solution was available.

The tanker movements would be highly infrequent relative to existing traffic volumes and would be scheduled outside weekday commuter and school peak periods where practicable. Tankers would use established urban roads capable of accommodating heavy vehicles and an approved route that avoids local residential streets where a reasonable alternative is available. Accordingly, the temporary infrequent additional movements are not expected to materially affect the capacity or efficient operation of the transport network for the temporary period any wastewater trucking were to occur.

Temporary noise, vibration and amenity effects may be experienced by residential properties adjoining the transport route. These effects will be limited by the low frequency and short duration of individual vehicle pass-bys, off-peak scheduling, use of established heavy-vehicle routes, and maintenance of tankers to appropriate operational standards. While adjoining residential catchments are sensitive to additional heavy-vehicle activity, the temporary and intermittent nature of the movements means that material reverse-sensitivity effects are not anticipated. Tankers should not idle unnecessarily near residential properties, and routine collection from the development should occur during daytime hours. The truck movements would be considered largely indiscernible to existing truck movements, or construction works associated with the wider development, or wider activity in the South Hamilton environs.

Wastewater would be transported in sealed, purpose-designed tankers, limiting the potential for odour, leakage and public-health effects. Collection points would be designed to enable safe access, manoeuvring and loading within each development area. A spill-response procedure would be maintained, including requirements for immediate containment, notification and clean-up in the unlikely event of an incident. Industrial wastewater would also be characterised and confirmed as acceptable for transport and receipt at the nominated treatment facility, likely the Cambridge Treatment Plant, which is managed by Waikato Waters Limited.

Given the limited number of movements, primary use of existing urban roads and temporary duration of the activity, these effects are expected to be negligible. The effects would be monitored through records of tanker movements, collection times, routes, complaints and any operational incidents. A material increase above any condition duration or frequency, would trigger a review of conditions of consent.

Any temporary wastewater truck movements, if considered and included as part of Panel consideration, would be appropriately conditioned and include a Temporary Wastewater Trucking Management Plan (WTMP) built into each respective set of relevant Waipa land use consents. Below is an example of how temporary wastewater truck movements could be considered in the current draft condition set, should it be built into the Application.

Temporary Wastewater Trucking

(XX) Temporary wastewater collection and transport

[Condition X] *Until the development is connected to an operational reticulated wastewater network or another consented permanent wastewater system, wastewater generated by the residential and industrial activities authorised by this consent may be removed from the site by road tanker, subject to the following:*

a. Wastewater shall be stored in sealed, appropriately designed storage facilities and transported by a suitably licensed contractor to a wastewater treatment or disposal facility authorised to receive the wastewater.

b. Tankers shall be fully enclosed and maintained to prevent wastewater leakage, spillage and unreasonable odour.

c. Tanker route to be certified with relevant road controlling authorities prior to implementation.

d. Routine tanker movements shall:

i. not exceed ***[XX] movements per day****, where one arrival and one departure constitute two movements;*

ii. occur only between ***[7:00am and 7:00pm Monday to Saturday]****;*

iii. avoid weekday commuter and school peak periods of ***[7:30–9:00am and 3:00–6:00pm]****; and*

iv. use the approved route shown covered in 'c', except where temporary road closures, emergencies or directions from a road-controlling authority require an alternative route.

e. Tanker loading shall occur within the site. Tankers shall not queue, park or idle on the public road or unnecessarily idle near residential properties.

f. Before wastewater trucking begins, the consent holder shall provide Council's Compliance Monitoring Officer with a ***Wastewater Trucking Management Plan (WTMP).*** *The objective of the WTMP is to detail the approach to be taken for managing temporary wastewater trucking to ensure that adverse effects that may arise from the works have been appropriately identified, managed and minimised. The WTMP must be updated as required to meet the objective. The WTMP shall include:*

i. the anticipated volume of wastewater and frequency of collection;

ii. the storage capacity and measures for preventing overflows;

iii. the tanker contractor and authorised receiving facility;

iv. the approved transport route and collection hours;

v. procedures for managing noise, odour and tanker access;

vi. contingency arrangements for equipment failure, delayed collection or periods of high wastewater generation;

vii. spill containment, notification and clean-up procedures; and

viii. procedures for receiving and responding to complaints.

g. Industrial wastewater shall be characterised before removal and shall not be transported until the receiving facility has confirmed that it is able and authorised to accept that wastewater.

h. The consent holder shall maintain records of wastewater volumes, tanker movements, collection dates and times, receiving facilities, complaints and spills. These records shall be retained for at least 24 months and provided to Council within five working days of a written request.

i. Any wastewater spill outside the sealed storage or tanker system shall be immediately contained and cleaned up. Council shall be notified as soon as practicable, and no later than 24 hours after any spill that enters, or has the potential to enter, the stormwater network, land outside the site or a water body.

j. Wastewater trucking shall cease within ***[10 working days]*** *of the permanent wastewater connection or other consented permanent servicing system becoming operational and available to the development.*

Advice note: *Emergency tanker movements required to prevent an imminent wastewater overflow may occur outside the specified hours or movement limits. Council should be notified within 24 hours, including the reason for the emergency movement and any corrective action undertaken.*

Overall, provided the above conditions and WTMP is implemented, the environmental effects of the interim trucking arrangement are expected to be temporary, localised and less than minor.

2.3 Scope and Consistency with Listed Project

Applicants Response

The Application included Volume 1 Overview Report, where Section 8.0 Proposal and Section 8.1 Scope of Southern Links 1 Substantive Application appropriately detailed the proposed departures from the originally listed project. Section 8.0 and 8.1 both detail the departures, the rationale for the approach taken and the overall consideration of how the revised project is considered in scope with the original listed project, Southern Links 1. In addition, Attachment 4, Legal Submission, section 6.0 Scope of the Application, addresses the scope of the substantive application as applied for, in the context of case law under the FTAA.

Fundamentally, the substantive application for the Project sites remains the same for the overall activity, being a masterplanned residential development and comprehensively designed industrial development.

In addition to the above, and in response to the HCC and Waipa District Council scope considerations raised with the EPA, the following is provided;

Hamilton Southern Links and implications

The Volume 1 Overview Report, *Section 7.5.2 Hamilton Southern Links Designation* provides an overview of the Hamilton Southern Links designation within the SL1 Growth Cell, and describes the various contextual components that make up the HSL designation status. This includes the various stages of HSL as identified by NZTA, and published online, and how this fits into the investment case framework. Specifically, Section 7.5.2 includes the following summary;

For the purposes of this Application HSL has been considered as part of the future strategic transport environment*. However, as outlined in detail within* ***V2*** *and* ***V3 Appendix 16*** *Transport Assessment,* ***the***

***transport conclusions contained do not rely on HSL being delivered within any specific timeframe**. **Rather, the assessment identifies both interim and future network scenarios and recommends appropriate mitigation and staging measures under each scenario**. [emphasis added]*

*Consultation and engagement with NZTA as part of the Substantive Application pre-lodgement process and has been outlined in detail within **V2** and **V3 - Attachment 2,** and the SL1 Project understands and promotes the vital strategic role that the future HSL will play in the south Hamilton and North Waipā environment.*

The Application documentation and supporting technical assessments have clearly understood the status of HSL, and some of the uncertainty associated with timing for this Road of National Significance. The comprehensive ITA submitted with the Application (see **Appendix 16 ITA**), includes Waikato Regional Transport Modelling (WRTM) with 11 scenarios, including with and without HSL. These scenarios were worked through with the relevant Road Controlling Authorities (including NZTA, HCC, Waipa) and agreed upon prior to undertaking the WRTM modelling.

The high-level transportation staging, as outlined in Section 8.3.5.1 for SL1 Residential South and Section 8.3.8.1 for Industrial North within the Volume 1 Overview Report, details the different scenarios of development occurring prior to HSL. As outlined in Attachment 3 – Legal Memorandum, footnote 12 on Page 7 captures the following: *For completeness we note an error in section 8.3.5.1 of the Overview Report lodged with the Application which described an earlier version of this condition, which would have required an updated ITA to be certified by NZ Transport Agency Waka Kotahi, HCC and WDC before further dwellings were constructed. That description does not reflect proposed Condition 285, which is the condition the Applicants seek.*

543 Dwelling Trigger

As outlined in the submitted **Appendix 16 ITA** and Volume 2 Assessment of Environmental Effects, the wider existing and planned transport environment is well understood, and the role and impact of a staged and phased SL1 Residential South development has been presented as part of conditions of consent.

In addition, a table, replicated as Table 5 below, with supporting variables has been presented which demonstrates the development beyond 543 dwellings. In practical sense, the residential development at 938 residential lots is of a scale where it will take multiple years to build and give effect to the overall residential supply. As outlined in the Overview Report and Economic Assessment, a period of 9 – 15 years is anticipated, noting enabling works and relevant civils to take place which can add lengthy ancillary time periods to the overall delivery of large greenfield developments like SL1. HCC and Waipā District Council have characterised the requirement for an additional ITA as a 'cap' on development beyond 543 dwelling. It is not: the Application seeks approval for the entire residential development, and the condition provides a mechanism to confirm the appropriate transport response before development proceeds beyond 543 dwellings taking into account that transportation environment as it may be at that time.

Attachment 2 Transportation Matters and Response, reaffirms that the 543-dwelling threshold is a reassessment, not a 'cap'. The importance of the dwelling threshold ties to development beyond that level without HSL, and therefore the need for a reassessment. As outlined in the BBO Appendix 16 – ITA and Attachment 2 response, a pathway of variables have been identified that are expected to influence development post 543 dwellings, at the time further reassessment has occurred.

As submitted in V2 Attachment 10 – Proposed Consent Conditions, condition 285 on the Waipa Land Use consent included the following:

543-Dwelling Comprehensive Reassessment Threshold

(285) 543 dwellings is a comprehensive transport reassessment threshold and not a development cap.

Prior to occupation of development exceeding this threshold, the Consent Holder shall prepare a UTA in accordance with Condition 272.

In addition to the matters required by Condition 272, the UTA shall specifically assess:

(a) the operation and safety of the Ohaupo Road corridor;

(b) whether the right-turn restriction at Ohaupo Road / Resthill Crescent identified in the 2026 ITA remains necessary and, if so, its approximate timing;

(c) the status of HSL and any resulting changes to route choice and network capacity;

(d) whether further walking, cycling or public transport-supporting infrastructure is required; and

(e) the appropriate mitigation and/or subsequent transport assessment threshold for further development.

Development beyond 543 dwellings may proceed in accordance with the mitigation and subsequent assessment threshold, if any, identified by the UTA.

Condition 272 as submitted reads:

Updated Transport Assessment

(272) Where these conditions identify a transport assessment threshold, the Consent Holder may, prior to exceeding that threshold, prepare an UTA by a suitably qualified and experienced transport engineer.

The UTA shall assess the transport effects of further development having regard to the best reasonably available transport information at the time, including, where relevant:

(a) actual development yield, land use and trip generation;

(b) observed traffic volumes, turning movements, heavy vehicle proportions, queues and intersection performance;

(c) updated crash and safety information;

(d) development completed or committed within relevant surrounding growth areas;

(e) transport infrastructure completed, under construction or committed since preparation of the 2026 ITA;

(f) the status, timing and form of HSL, including any relevant connections to SH3 or the local transport network;

(g) public transport provision, travel behaviour and mode share;

(h) walking and cycling infrastructure and active-mode uptake; and

(i) updated strategic and/or operational transport modelling.

BBO, and the Applicant, consider with the implementation of the above conditions and with consideration of the variables outlined below in **Table** , a clear consenting framework has been established that will enable the full extent of the SL1 Residential South development to be implemented.

Table 5: Variables for Residential Development – SL1 Residential South, source BBO ITA Appendix 16 Table 45

Illustrative Variables for Residential Development Reassessment Beyond 543 Dwellings

Variable	Current Assessment Assumption in Scenario 2	Example Alternative Assumption	Indicative Change to Assessment
Residential vehicle trip generation	Scenario 2 (543 dwellings) generates approximately 345 vehicle trips per peak hour (0.66 vehicles per low-density dwelling and 0.62 vehicles per medium-density dwelling).	If the lower range of vehicle trip rates from the NSW Guide were adopted: Low-density dwelling: 0.83 vehicles per dwelling Medium-density dwelling: 0.41 vehicles per dwelling A lower vehicle trip rate is likely to capture some combination of higher public transport use, higher active-mode use, trip chaining, internal trips and lower vehicle ownership.	By way of illustration, if lower vehicle trip-generation rates were realised in practice, the Residential Development could generate materially fewer peak-hour vehicle trips than assumed in Scenario 2. This could increase the number of dwellings accommodated before the development generates the same peak-hour traffic demand—345 vehicles per hour—assessed for Scenario 2. Indicatively, this difference is equivalent to approximately 94 additional medium-density dwellings based on vehicle trip generation alone and assuming the same trip-distribution patterns as adopted in the current assessment. This does not represent a reassessment of network capacity or intersection performance.
Airport Business Zone ("ABZ") Development	The land-use and employment assumptions for the ABZ are based on HSL Scenario 31 model runs undertaken by NZTA.	Development does not progress as assumed in WRTM Scenarios 2–5.	Potential reduction or increase in traffic volumes on Ohaupo Road and a change in traffic distribution at critical intersections.
Peacocke Structure Plan Development	The land-use and employment assumptions for the Peacocke Structure Plan area are based on HSL Scenario 31 model	Development does not progress as assumed in WRTM Scenarios 2–5.	Potential reduction or increase in traffic volumes on Ohaupo Road and a change in traffic distribution at critical intersections.

	runs undertaken by NZTA.		
HSL delivery	Stage 1 of HSL—the section between Kahikatea Drive and Killarney Road—is assumed to be completed in Scenario 2.	HSL is fully delivered and operational.	Potential change in route choice, traffic distribution and demand on the Ohaupo Road corridor.

For the above reasons, as reaffirmed by the Attachment 2 Transportation Matters and Response and Attachment 3 – Legal Memorandum – Scope, the Application seeks approvals for the entirety of the development.

Relevance to Section 46 completeness

Please see Attachment 3 – Legal Memorandum – Scope, which addresses S46 and other matters. In summary, **the Applicants consider that the matters raised do not identify a deficiency that prevents the EPA from accepting the application as complete under s 46(1) of the FTAA.** Questions concerning the ultimate form of conditions, infrastructure interfaces and implementation arrangements are capable of being considered through the substantive Panel process.

Funding uncertainty and potential implications for staging and timing of development

The Applicants acknowledge that funding and delivery arrangements for transport and three waters infrastructure remain matters to be finalised between the Applicants, HCC (including IAWAI staff) and Waipa District Council (to a lesser extent). Those matters have been the subject of pre-lodgement engagement discussions addressing infrastructure delivery, funding, cost allocation and implementation.

Ongoing consultation with New Zealand Transport Agency, the status of the Hamilton Southern Links project and subsequent design, funding and implementation continues to be progressed. **The SL1 Industrial North layout does not preclude the future implementation of the HSL designation, particularly for Stage 1 of HSL the Applicants see the Industrial North project as an enabler and early facilitator for this investment in the future.** The transition from an interim or permanent solution within the HSL corridor has been considered within the Appendix 16 ITA and further described in the Attachment 2 Transportation Matters and Response.

Economic benefit

As outlined above, the scope of what has been applied for is consistent with the listed project. Insight Economics have provided Economic Assessments to support the Industrial North and Residential South economic benefits, which articulate the regional benefits for the Listed Project. The Southern Links 1 project was listed together, i.e. both Industrial North and Residential South, and both Insight Economic assessments have demonstrated the significant regional benefit in industrial and residential supply and the wider associated benefits with the SL1 Project, which will support further strategic infrastructure investment, like in Hamilton Southern Links, Southern Wastewater Treatment Plant, Southern Water Reservoir, transportation improvements, which are important wider enablers for South Hamilton and North Waipa. Any conditions imposed by the panel will appropriately manage the potential adverse effects, including on the localised and wider transportation network. The Applicants do not accept that the proposed conditions act as a 'cap'. They reflect incremental interventions proposed to respond to the transportation effects associated with the proposed development. The Economic Assessments included in the Application assess

the Project as applied for (938 dwellings and approximately 60 ha of industrial land), and demonstrate the regionally significant benefits that both the Residential and Industrial developments would contribute.

Yours sincerely | Nā māua noa, nā

Barker & Associates Limited





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Attachment 1

Hamilton City Council Objectives and Policies Assessment

B&A
Urban & Environmental

Attachment 1 –HCC Objectives and Policies Assessment

Contents

1.0 Overview **2**

2.0 Hamilton City District Plan **3**

Chapter 2 – Strategic Framework (combined SL1 Residential South and Industrial North assessment) 3

Chapter 20 Natural Environments 63

Chapter 25.14 – Transportation 69

1.0 Overview

As identified in the Application, the Project is predominantly located within the Waipā District. However, three parcels, Lot 2 DP 589463, Part Lot 2 DP 25668 and Lot 3 DP 394366 and Lot 1 DP 51518, of the Project site are partially within Hamilton City, where they front Saxbys Road. In addition, the proposed transportation improvements cover the wider surrounding residential streets for Residential South, including Forth Crescent, Macmurdo Avenue, Ohaupo Road, Deanwell Avenue, and others. The wider Industrial North project includes proposed transportation improvements, including Kahikatea Drive and Greenwood Street, Wickham Street, and others. The above identified parcels form part of the Project site for the purpose of providing roading and shared path connections between the development and the existing Hamilton City transport network, and the roads described above, in the supporting Appendix 16 ITA, capture the wider infrastructure improvements in the Hamilton roading network.

Section 44 of the FTAA requires the information set out in section 43 to be specified in sufficient detail to satisfy the purpose for which it is required. Consistent with this requirement, the assessment of the Hamilton City Operative District Plan (HCC ODP) reflects the limited nature and extent of the activities proposed within the Hamilton City jurisdiction.

Two resource consent triggers have been identified under the HCC ODP: the first arises from the formation of the proposed road connections under Chapter 25.14 – Transportation [Rule 25.14.3b *New Transport Corridors – Restricted Discretionary*]; and the second is the removal of two notable trees under Chapter 20 – Natural Environments, which is a discretionary activity under Rule [20.3aa] (refer to Section 2.1 of the Planning Response Memorandum). Accordingly, the assessment below focuses on the objectives and policies of Chapter 25.14 relevant to the proposed road connections and their integration with the existing and planned transport network. In addition, as outlined in the Appendix 16 Integrated Transport Assessment Concept Plans, the proposed Ohaupo Road / Resthill Crescent intersection upgrade, which is required before development exceeds 543 dwellings, will likely require the removal of two notable trees. An assessment against the relevant objectives and policies of Chapter 20 – Natural Environments is therefore also included below.

The assessment also addresses relevant higher-order objectives and policies in Chapter 2 – Strategic Framework of the HCC ODP. These provisions were assessed for the Residential South site in the Application. That assessment is carried over below and extended to the Industrial North site, where the provisions give context to the Project's relationship with Hamilton City's wider urban and transport network. Given the limited extent of works within Hamilton City and the absence of other HCC ODP consent triggers beyond those identified above, a broader assessment of objectives and policies relating to activities not proposed within Hamilton City is not considered necessary, beyond the chapter specific and strategic framework assessment which follows.

2.0 Hamilton City District Plan

Chapter 2 – Strategic Framework (combined SL1 Residential South and Industrial North assessment)

Provision	Comment
Chapter 2: Strategic Framework	
2.2 Objectives and Policies: Strategic Framework	
Objective 2.2.1 Resource management priorities are developed in partnership with mana whenua.	The proposal is considered consistent with Objective 2.2.1. Mana whenua have been actively involved in the development of the proposal through the SL1 Tangata Whenua Working Group, which includes representatives of Ngaati Wairere, Ngaati Maahanga, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Koroki-Kahukura, Ngaati Apakura and Waikato-Tainui. This engagement has provided an ongoing forum for mana whenua to identify relevant cultural values, priorities and resource management matters associated with the wider SL1 Growth Cell, Residential South and Industrial North sites. The Cultural Impact Assessment (refer to **Residential South - Appendix 24**) further identifies the relationships of tangata whenua with the whenua, wai and wider cultural landscape and has informed the planning and design response. In particular, mana whenua input has influenced the treatment of the Mangakōtukutuku Stream and associated waterways, stormwater management, riparian restoration and indigenous planting, together with opportunities for cultural expression and the ongoing exercise of kaitiakitanga. The Cultural Impact Assessment (refer to **Industrial North - Appendix 24**) further identifies the relationships of tangata whenua with the whenua, wai and wider cultural landscape and has informed the planning and design response. In particular, mana whenua input has influenced stormwater management and indigenous

	planting, together with opportunities for cultural expression and the ongoing exercise of kaitiakitanga. The engagement undertaken has been comprehensive. Mana whenua have been involved in identifying relevant values and shaping the environmental and cultural response as the development of the proposal has progressed. Continued involvement through implementation and environmental management will provide further opportunities for mana whenua priorities to be reflected in the development. Accordingly, the proposal is considered to give effect to the partnership-based approach sought by Objective 2.2.1.
Policy 2.2.1a The relationship mana whenua have with the City is recognised and promoted.	The proposal is considered consistent with Policy 2.2.1a. The relationship of mana whenua with the Site and the wider Hamilton area has been recognised through ongoing engagement with the SL1 Tangata Whenua Working Group, comprising representatives of Ngaati Wairere, Ngaati Maahanga, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Koroki-Kahukura, Ngaati Apakura and Waikato-Tainui. This engagement has provided a mechanism for mana whenua values, aspirations and mātauranga to inform the development of the proposal in relation to both the Residential South and Industrial North sites. The Cultural Impact Assessment (refer to Residential South - Appendix 24) identifies the cultural relationships with the whenua, wai and wider ancestral landscape and has informed the proposal, including the treatment of the Mangakōtukutuku Stream and associated waterways, riparian restoration, indigenous planting, stormwater management and opportunities for cultural expression and kaitiakitanga. The proposal also provides for continued mana whenua involvement through implementation and environmental management. The Cultural Impact Assessment (refer to Industrial North - Appendix 24) further identifies the relationships of tangata whenua with the whenua, wai and wider cultural landscape and has informed the planning and design response. In particular, mana whenua input has influenced stormwater management and indigenous

	planting, together with opportunities for cultural expression and the ongoing exercise of kaitiakitanga. Accordingly, the Residential South and Industrial North sites each recognise and provide practical opportunities to maintain and strengthen the relationship of mana whenua with the area, consistent with Policy 2.2.1a.
Policy 2.2.1b Development considers effects on the unique mana whenua relationships, values, aspirations, roles and responsibilities with respect to an area.	The proposal is considered consistent with Policy 2.2.1b. The effects of the Residential South proposal on the relationships, values, aspirations, roles and responsibilities of mana whenua have been specifically considered through ongoing engagement with the SL1 Tangata Whenua Working Group and preparation of the Cultural Impact Assessment (refer to Residential South - Appendix 24). This process has identified the importance of the whenua, wai and wider ancestral landscape, including the Mangakōtukutuku Stream and its relationship with the Waikato River catchment, and has informed the design and environmental management of the development. The proposal incorporates measures including retention and enhancement of the stream and riparian corridor, indigenous planting and ecological restoration, integrated stormwater management and opportunities for cultural expression. It also provides for continued mana whenua involvement in implementation and monitoring, supporting the ongoing exercise of mana whakahaere and kaitiakitanga. In addition, the Cultural Impact Assessment (refer to Industrial North - Appendix 24) further identifies the relationships of tangata whenua with the whenua, wai and wider cultural landscape and has informed the planning and design response. In particular, mana whenua input has influenced stormwater management and indigenous planting, together with opportunities for cultural expression and the ongoing exercise of kaitiakitanga. Accordingly, the proposal has considered mana whenua values as an integral part of the development and its effects-management response, rather than as a separate or subsequent consideration. The proposal therefore appropriately recognises the

	unique relationships, aspirations, roles and responsibilities of mana whenua with respect to the area, consistent with Policy 2.2.1b.
Policy 2.2.1c As part of the development process, decisions on land use, subdivision and development include ongoing consultation and collaboration with mana whenua where appropriate.	The proposal is considered consistent with Policy 2.2.1c. Mana whenua engagement has been an ongoing component of the planning and development of Residential South and Industrial North proposals, principally through the SL1 Tangata Whenua Working Group and preparation of the Cultural Impact Assessment (refer to **Residential South - Appendix 24 and Industrial North - Appendix 24**). This has provided opportunities for mana whenua to participate in discussions as the proposal has developed and for their values, aspirations and concerns to inform decisions on the layout, design and environmental management of the Site. This collaboration has influenced matters including the treatment and enhancement of the Mangakōtukutuku Stream and associated waterways, riparian and indigenous planting, ecological restoration, stormwater management and opportunities for cultural expression and kaitiakitanga. Importantly, mana whenua involvement is not limited to the application process, with opportunities for continued involvement through implementation, environmental management and monitoring. Accordingly, the proposal demonstrates an ongoing and collaborative approach to mana whenua engagement throughout the development process, consistent with Policy 2.2.1c.
Policy 2.2.1d Where required, development and the decisions associated with developments are to consider any relevant Iwi Management Plan.	The proposal is considered consistent with Policy 2.2.1d. Relevant iwi management planning documents have been considered as part of the development of Residential South and Industrial North, including the Waikato Tainui Environmental Plan – Tai Tumu, Tai Pari, Tai Ao. The proposal has also been informed by the Cultural Impact Assessment (**Residential South - Appendix 24 and Industrial North - Appendix 24)** and ongoing engagement with the SL1 Tangata Whenua Working Group. The proposal responds to relevant iwi environmental management priorities through its treatment of whenua and wai, including the protection and enhancement of the Mangakōtukutuku Stream corridor, riparian and indigenous planting, ecological

	restoration, integrated stormwater management and measures to maintain and improve freshwater values. The proposal also provides for the ongoing exercise of kaitiakitanga and mana whakahaere through continued mana whenua involvement in implementation and environmental management. Accordingly, relevant iwi management planning considerations have formed part of the assessment and development of the proposal, consistent with Policy 2.2.1d.
Objective 2.2.2 a. The health and wellbeing of the Waikato River is restored and protected so that it may sustain abundant life and prosperous communities b. The Waikato River is celebrated as being at the heart of the region's identity and recognised as a feature of national importance.	The proposal is considered consistent with Objective 2.2.2. While the Residential South site and Industrial North site do not directly adjoin the Waikato River, the sites are within the wider Waikato River catchment, with the Mangakōtukutuku Stream ultimately forming part of the receiving environment connected to the Waikato River, and the Industrial North site being within the wider catchment of the upper tributary of the Waitawhiriwhiri Stream The health and wellbeing of the Waikato River is therefore relevant to the way freshwater, stormwater and ecological effects are managed within the Project Site. The proposal incorporates an integrated blue-green and stormwater management approach designed to protect and improve the quality of water leaving the Site. This includes retention and enhancement of the Mangakōtukutuku Stream corridor, riparian and indigenous planting, on-lot stormwater retention and soakage, treatment through six constructed artificial wetlands, attenuation of peak flows and erosion and sediment controls during construction. The proposal will also remove existing pastoral land uses and associated stock access and agricultural contaminant inputs from the site, while ecological restoration will improve freshwater habitat and connectivity. The relationship of mana whenua with the Waikato River and its tributaries has also been recognised through engagement with the SL1 Tangata Whenua Working Group and the Cultural Impact Assessment (refer to **Residential South - Appendix 24 and Industrial North – Appendix 24**). This has informed the treatment of wai within the masterplan, including restoration and enhancement of waterways, indigenous

	planting and opportunities for ongoing kaitiakitanga and mana whakahaere. These measures support Te Ture Whaimana / the Vision and Strategy for the Waikato River, particularly its overarching focus on restoring and protecting the health and wellbeing of the Waikato River for present and future generations. For the Industrial North site an integrated stormwater management approach designed to protect and improve the quality of water leaving the site is proposed, which accords with the Waitawhiriwhiri ICMP and broader catchment based approach. Although the Waikato River itself is physically removed from the proposal site, the proposal recognises that the health of the Waikato River depends on the management of its wider catchment and tributaries, therefore both Residential South and Industrial North are considered within the wider Waikato River catchment. Through the proposed water-sensitive design, freshwater and riparian restoration, contaminant management and involvement of mana whenua, the proposal will contribute to protecting and enhancing the wider Waikato River system. The proposal is therefore considered consistent with Objective 2.2.2 and its recognition of the Waikato River as a nationally significant feature central to the environmental, cultural and community identity of the region.
Policy 2.2.2a Realise opportunities to restore and protect the natural character, amenity, and the indigenous aquatic and terrestrial biodiversity of the Waikato River by: (i) Managing activities in the Natural Open Space Zone and Waikato Riverbank and Gully Hazard Area. (ii) Identifying and managing Significant Natural Areas. (iii) Preparing and implementing Integrated Catchment Management Plans.	For the Residential South site, the proposal aligns particularly strongly with (v)–(vi) through the incorporation of water sensitive design techniques throughout the Project. Each residential lot will incorporate a 5,000 litre rainwater tank, with stormwater also managed through soakage, a reticulated network and six constructed wetlands. These measures provide for retention and treatment at source, support groundwater recharge and reduce the volume and rate of runoff entering the receiving environment. The stormwater system is designed to achieve water-quality treatment and attenuation, including managing the 2- and 10- year events to pre-development levels and the 100-year future climate event to no more than 80% of the pre-development peak flow. While the proposal introduces additional impermeable surfaces, their effects are addressed through an integrated

(iv) Require financial contributions from developments to fund works to restore and protect the Waikato River. (v) Requiring new subdivision and development to incorporate water-sensitive techniques to reduce demand for water supply and wastewater disposal and to manage stormwater. (vi) Limiting the area of impermeable surface to sustain ground-water recharge and stream flow and reduce the volume of contaminants discharged to surface water. (vii) Managing residential intensification and infrastructure provision to ensure the latter has sufficient capacity to support the former. (viii) Managing activities to avoid river and stream bank erosion, river and stream bed scouring and deposition.	water-sensitive stormwater system rather than relying solely on conventional conveyance. With respect to (vii), the approximately 938 dwellings will be delivered progressively across five stages and coordinated with the necessary water, wastewater, stormwater and transport infrastructure. The Infrastructure Report (refer to Residential South - Appendix 13) identifies both interim and longer-term servicing solutions to ensure that development is matched with sufficient infrastructure capacity rather than allowing residential growth to outpace servicing. The proposal also responds to the policy's direction concerning stream erosion, scour and deposition. Stormwater attenuation and controlled discharge will limit increases in peak flows, while riparian restoration and enhancement of the Mangakōtukutuku Stream corridor will assist in protecting stream margins and aquatic habitat. Construction-phase erosion and sediment controls will further manage the potential for sediment to enter waterways during earthworks. With respect to the Industrial North site, (iii), (v), (vi) have been carefully considered in the wider refinement of the proposed industrial land use and subdivision. The stormwater management philosophy aligns with the Waitawhiriwhiri ICMP and broader principles. A balanced approach to impermeable surfaces has been adopted, planting provisions and planted stormwater ponds that contribute positively toward the industrial amenity outcomes can be achieved and improve stormwater discharge via the integrated stormwater pond design. No high user water activities are anticipated, and water efficiency measures are to be integrated into future buildings. Overall, although some of the specific mechanisms in Policy 2.2.2a are not directly applicable to the Project Site, where the site is not subject to Waikato River Gully Hazard Area overlay, or Significant Natural Areas overlays, the proposal adopts the water sensitive, catchment based and infrastructure coordinated approach sought by the policy. In particular, the combination of stormwater treatment and attenuation, soakage and rainwater retention, riparian and ecological restoration, and staged infrastructure provision will assist in protecting the Mangakōtukutuku Stream

	(Residential South) and the Waitawhiriwhiri Stream (Industrial North) and, in turn, the wider Waikato River catchment. The proposal is therefore considered generally consistent with Policy 2.2.2a.
2.2.2b Restore and protect the cultural, spiritual, social and economic relationships of Waikato-Tainui with the Waikato River by: (i) Providing for all the activities, infrastructure, amenities, and services necessary to achieve a well-functioning city to support personal, community, and environmental wellbeing. (ii) Implementing the Joint Management Agreement with Waikato Tainui. (iii) Providing for active involvement of mana whenua in freshwater management, including decision-making processes and implementing maatauranga Maaori, including cultural monitoring. (iv) Identifying and providing for mana whenua freshwater and other values and aspirations through the preparation and implementation of Integrated Catchment Management Plans and Structure Plans. (v) Implementing Policy 2.2.2a Identifying, and managing activities within, natural hazard areas. (vi) Realising opportunities to maintain and enhance public access to and along the Waikato River, including through the retention of existing, and creation of new, esplanade reserves. (vii) Providing for customary activities within Open Space Zones. (viii) Identifying, respecting and protecting archaeological sites, taonga and sites of significance to Maaori and providing for their recognition.	The proposal is considered consistent with Policy 2.2.2b. The proposal has been developed having regard to the relationship of Waikato Tainui and mana whenua with the Waikato River and its wider catchment. While several of the specific methods within the policy relate to Council-led processes or activities directly associated with the Waikato River and are therefore not directly applicable to the proposal, the proposal responds to the policy's broader direction to restore and protect cultural, spiritual, social and economic relationships with the River. In relation to (i), the Residential South development will contribute to a well-functioning urban environment through the provision of approximately 938 dwellings, a neighbourhood commercial node, public open space, walking and cycling connections and coordinated transport and three waters infrastructure. These elements will support the social and economic wellbeing of the future community, while the integrated blue-green network, stormwater management and ecological restoration provide for environmental wellbeing. In relation to (i), the Industrial North development will contribute to a well-functioning urban environment and will deliver a substantial increase in development-ready industrial and employment capacity in an appropriate and strategically connected location. It responds directly to an identified shortage of industrial land while integrating land use, infrastructure, transport accessibility, environmental management, resilience and amenity considerations within a comprehensively planned development. The resulting employment opportunities, increased business choice and competition, strategic infrastructure integration and substantial economic benefits will contribute materially to the social and economic wellbeing, health and safety of the wider urban community. The proposal will

(ix) Providing for papakaainga development within Residential Zones and Community Facilities Zone. (x) Enabling public art in selected Zones.	therefore contribute to a well-functioning urban environment and is considered consistent with Policy 2.2.2b. With respect to (ii)–(iv), the Joint Management Agreement is principally a matter for the relevant local authorities and Waikato Tainui rather than an implementation requirement for the Applicant. However, it is noted that mana whenua have been actively involved in the development of the proposal through the SL1 Tangata Whenua Working Group and the Cultural Impact Assessment (refer to **Residential South - Appendix 24 and Industrial North – Appendix 24**). This engagement has enabled mana whenua values and aspirations relating to whenua and wai to inform the proposal, including the treatment of the Mangakōtukutuku Stream and associated waterways, riparian restoration, indigenous planting, ecological enhancement and stormwater management. The proposal also provides opportunities for continued mana whenua involvement in implementation and environmental management, including the exercise of kaitiakitanga and mana whakahaere. In relation to (v), the proposal responds to Policy 2.2.2b through an integrated and water sensitive approach to stormwater and freshwater management. Natural hazard risks, particularly flooding, groundwater and geotechnical hazards, have been comprehensively assessed and incorporated into the subdivision design. The six constructed artificial wetlands, defined overland flow paths, development levels and stormwater attenuation measures provide a resilient response to flooding, including under future climate change conditions. Clauses (vi), (vii), (ix) and (x) are not directly applicable. The Project Site does not adjoin the Waikato River itself. However, the masterplan provides substantial public open space and walking and cycling connections associated with the Mangakōtukutuku Stream and riparian corridor, improving access to and interaction with the site's freshwater environment. Opportunities for cultural expression within the Project Site have also been identified through the mana whenua engagement process.

	In relation to (viii), cultural and archaeological values have been specifically considered. The Archaeological Assessment (refer to **Residential South - Appendix 25 and Industrial North – Appendix 25**) identifies no recorded archaeological sites within the Project Site, with accidental discovery procedures proposed to manage any previously unidentified archaeological material encountered during earthworks. The Cultural Impact Assessment and ongoing mana whenua engagement provide a broader mechanism for recognising cultural values, associations and sites of significance beyond formally recorded archaeological sites. Overall, the proposal recognises that the Mangakōtukutuku Stream and Waitawhiriwhiri Stream form part of the wider Waikato River catchment and that management of their whenua and wai contributes to the relationship of Waikato Tainui with the River. Through ongoing mana whenua involvement, water sensitive design, freshwater and ecological restoration, cultural recognition and the creation of a well-functioning community, the proposal supports the cultural, spiritual, social and economic outcomes sought by Policy 2.2.2b.
Policy 2.2.2c Restore and protect communities' relationships with the Waikato River, including their economic, social, cultural and spiritual relationships by: (i) Implementing Policies 2.2.2a and 2.2.2b. (ii) Identifying and protecting heritage sites and buildings.	The proposal is considered consistent with Policy 2.2.2c. The Residential South proposal will contribute to restoring and protecting the community's relationship with the wider Waikato River catchment through the measures addressed under Policies 2.2.2a and 2.2.2b. Although the Project Site does not directly adjoin the Waikato River, the Mangakōtukutuku Stream forms part of its wider catchment, and the proposal recognises this relationship through its integrated freshwater, ecological, cultural and open-space response. The masterplan incorporates the Mangakōtukutuku Stream and associated riparian corridor within a wider blue-green network, including ecological restoration, indigenous planting, stormwater treatment and walking and cycling connections. These measures will improve the environmental quality and accessibility of the Site's freshwater environment and provide opportunities for future residents and the wider community to experience and connect with the catchment. The proposal also supports social and economic wellbeing through the development of approximately

	938 dwellings, a neighbourhood commercial node, public open space and coordinated infrastructure, while cultural and spiritual relationships with whenua and wai have been recognised through engagement with the SL1 Tangata Whenua Working Group and the Cultural Impact Assessment (refer to **Residential South - Appendix 24**). The Industrial North proposal is considered consistent with Policy 2.2.2c, where the stormwater methodology will contribute to improvement in water quality to the downstream Waitawhiriwhiri Stream and tributary, which will contribute to restoring and protecting the community's relationship with the wider Waikato River catchment through the measures addressed under Policies 2.2.2a and 2.2.2b. The proposal also supports social and economic wellbeing through the development of 22 industrial lots with coordinated infrastructure, while cultural and spiritual relationships with whenua and wai have been recognised through engagement with the SL1 Tangata Whenua Working Group and the Cultural Impact Assessment (refer to **Industrial North - Appendix 24**). In relation to heritage, the Archaeological Assessments (refer to **Residential South - Appendix 25 and Industrial North – Appendix 25**) identify no recorded archaeological sites within the development area, and no identified heritage buildings are affected by the proposal. Accidental discovery procedures will apply during earthworks to appropriately manage any previously unidentified archaeological material. Overall, through implementation of the measures addressed under Policies 2.2.2a and 2.2.2b, together with the protection of heritage and archaeological values, the proposal supports the environmental, social, economic, cultural and spiritual relationships of communities with the wider Waikato River catchment and is therefore consistent with Policy 2.2.2c.
Objective 2.2.3 Hamilton is characterised by an increasingly sustainable urban form.	The proposal is considered consistent with Objective 2.2.3, as the Residential South proposal will establish a compact, connected and comprehensively planned

extension of Hamilton's existing urban area that incorporates sustainable land use, transport, infrastructure and environmental design principles.

The development will provide approximately 938 dwellings across a range of terrace, duplex and detached housing typologies, achieving an efficient use of land while providing housing choice. The Site directly adjoins the existing urban area at Glenview and Deanwell and forms part of the strategically identified SL1 Growth Cell. The proposal therefore represents a contiguous extension of Hamilton rather than dispersed or isolated urban development. The masterplan integrates residential development with a neighbourhood commercial node, public open space and the Mangakōtukutuku Stream and wider blue-green network, enabling future residents to access local services, recreation and open space within a walkable neighbourhood.

The movement network further supports a sustainable urban form through connections to Saxbys Road, Macmurdo Avenue and Forth Crescent, a connected network of walking and cycling facilities and provision for future public transport. These measures provide alternatives to private vehicle travel and support improved connectivity with the existing city and future development within the wider growth cell.

Sustainability is also embedded in the servicing and environmental response. The development incorporates water sensitive stormwater management, including on-lot rainwater retention and soakage, six constructed wetlands, defined overland flow paths and controlled discharge. The stormwater system has been designed for future climate change conditions, while riparian restoration, indigenous planting and ecological enhancement associated with the Mangakōtukutuku Stream will provide a multifunctional blue-green network delivering stormwater, biodiversity, amenity and recreational benefits. Infrastructure will also be delivered progressively with the five-stage development, ensuring growth is coordinated with the capacity and provision of transport and three-waters infrastructure.

While the proposal will convert a greenfield rural site to urban use, this needs to be considered in the context of its identified strategic growth role. The proposal makes

	efficient use of that land through a relatively compact residential form and integrates land use, transport, infrastructure and environmental outcomes rather than providing conventional low-density or fragmented peripheral development. In respect of the Industrial North site, the proposal will result in the further urbanisation and intensification of the Site as a planned industrial precinct. While this represents a permanent change, the significance of that change is moderated by the existing environment and strategic context. Industrial activities already occupy a portion of the wider area which immediately adjoins the established Frankton industrial area and is strongly influenced by existing industrial development, the North Island Main Trunk railway and the designated Hamilton Southern Links corridor. The Site also forms part of the wider SL1 Growth Cell identified for urban expansion. The proposal therefore represents a logical consolidation and extension of an established industrial environment rather than an isolated or unanticipated urban development. Overall, the Proposal will contribute to an increasingly sustainable urban form for Hamilton by concentrating substantial housing capacity and industrial land in a contiguous and strategically identified growth location, providing a compact and connected neighbourhood, supporting active and future public transport modes, coordinating development with infrastructure and incorporating resilient blue-green infrastructure. The proposal is therefore considered consistent with Objective 2.2.3.
Policy 2.2.3a Development makes use of opportunities for urban intensification.	The proposal is considered generally consistent with Policy 2.2.3a. The Residential South proposal is a greenfield development and therefore does not constitute urban intensification in the conventional sense of redevelopment or increased density within an existing urban area. However, the proposal makes efficient use of land identified for Hamilton's future urban growth by providing a relatively compact, predominantly medium-density residential form immediately adjoining the existing urban area.

	The proposal will provide approximately 938 dwellings across terrace, duplex and detached housing typologies, with an average lot size of approximately 250 m² and more than 80% of residential lots below 300 m². Higher densities are generally concentrated internally and in proximity to the neighbourhood commercial node, open space and movement network, enabling substantial housing capacity to be accommodated within the Site while maintaining appropriate transitions at its boundaries. The proposal therefore represents an efficient and comparatively intensive use of greenfield land, reducing the amount of additional land required to accommodate an equivalent level of housing growth and supporting walking, cycling and future public transport. While it does not directly deliver intensification of the existing urban area, it responds to the underlying intent of Policy 2.2.3a by maximising opportunities for a compact and efficient urban form within the strategically identified SL1 Growth Cell.
Policy 2.2.3b Development is designed and located to minimise energy use and carbon dioxide production by: (i) Minimising the need for private motor vehicle use; (ii) Prioritising walking, cycling, micro-mobility, and the use of public transport. (iii) Maximising opportunities for people to live, work and play within their local area.	The Residential South and Industrial North proposals are considered consistent with Policy 2.2.3b. Each proposal has been designed as a compact, connected neighbourhood that integrates land use and transport planning to reduce reliance on private motor vehicles and support lower-carbon travel choices. In relation to (i) and (ii), the Residential South masterplan provides a highly connected movement network with walking and cycling facilities integrated throughout the development and connections to the existing network via Saxbys Road, Macmurdo Avenue and Forth Crescent. Walking and cycling are prioritised through the street hierarchy and connections to open spaces, the Mangakōtukutuku Stream corridor and Resthills Park. The proposed collector network also provides for future public transport, enabling the development to be served by public transport as the wider southern growth area develops. The compact residential form and relatively high density will further support the viability and accessibility of active modes and future public transport.

	In relation to (iii), the development integrates approximately 938 dwellings with a centrally located neighbourhood commercial node, neighbourhood park, blue-green corridors and connected recreational spaces. This will provide opportunities for residents to access everyday services, recreation and open space within or close to the neighbourhood, reducing the need to travel elsewhere for all daily activities. The Site's location immediately adjoining the existing Hamilton urban area also provides access to the established employment, education, retail and community facilities within the wider city. The Industrial North proposal supports a more efficient urban form by locating a substantial employment precinct immediately adjoining Hamilton's existing industrial area and adjacent to strategic freight and transport infrastructure. The Economic Assessment (refer to Industrial North – Appendix 29) notes that co-locating employment and planned housing within the same growth cell can reduce commuting distances and improve the balance of jobs and homes, while the site's proximity to the Southern Links corridor places land-intensive industrial, logistics and distribution activities where they can efficiently access the strategic road network. The internal transport network also provides alternatives to private vehicle travel. The design includes safe and direct walking and cycling routes along key public streets, including shared paths associated with the collector and Higgins Road connections, and provides for integration with the wider planned active-mode network. While the proposal is an industrial development with an inherent freight function, these measures support mode choice for employees and contribute to the longer-term transition toward lower emissions travel. Overall, the combination of a compact urban form, connected active-mode network, provision for future public transport and integration of housing with local services and recreation will reduce dependence on private vehicles and support lower energy use and transport-related emissions. The proposal is therefore considered consistent with Policy 2.2.3b.

Policy 2.2.3c Land use zoning and subdivision controls will be used as methods to achieve the sustainable use of the City's land resources including providing for separation, proximity and agglomeration of land uses.	The proposal is considered generally consistent with Policy 2.2.3c. The policy is principally directed at the use of zoning and subdivision controls as planning methods to achieve an appropriate spatial relationship between land uses. While the Residential South site is currently zoned Rural and the proposal does not itself rezone the Site, the development has been comprehensively masterplanned to establish a logical and sustainable pattern of urban land use within the strategically identified SL1 Growth Cell. The Residential South proposal provides approximately 938 dwellings together with a neighbourhood commercial node, neighbourhood park, blue-green network and integrated transport and three waters infrastructure. The arrangement of these activities promotes appropriate proximity and agglomeration, with higher residential densities generally located internally and close to amenities, open space and key movement routes. The neighbourhood commercial node provides opportunities for local services within walking and cycling distance of residents, while the Site's location immediately adjoining Hamilton enables ready access to the wider Hamilton City's employment, education, retail and community facilities. The masterplan also provides appropriate separation and transitions between potentially incompatible activities. Lower intensity residential development, setbacks, landscaping and other design controls are used at sensitive rural interfaces, while the layout responds to existing and planned infrastructure and separates development from environmental constraints through the Mangakōtukutuku Stream and blue-green network. Although the proposal does not accord with the Site's existing Rural zoning, this reflects the operative zoning rather than an inherently unsustainable spatial relationship between the proposed land uses. The Residential South proposal represents a comprehensively planned and contiguous urban extension in an area strategically identified for future growth, with the subdivision layout and associated controls establishing an appropriate distribution and relationship of residential, commercial, recreational and infrastructure activities. The proposal therefore

supports the sustainable land use outcomes sought by Policy 2.2.3c, notwithstanding that those outcomes are being achieved through the Fast-track approval rather than a preceding rezoning process.

In respect of the Industrial North site, the policy is principally directed at the use of zoning and subdivision controls as planning methods to achieve an appropriate spatial relationship between land uses. While the Industrial North site is currently zoned Rural and the proposal does not itself rezone the Site, the development has been comprehensively masterplanned to establish a logical and sustainable pattern of urban land use within the strategically identified SL1 Growth Cell adjoining the established Frankton industrial area.

The proposal will provide approximately 41.4 ha of net industrial land, enabling approximately 168,000 m² of future industrial and associated floorspace across 22 serviced lots. This represents a substantial addition to industrial capacity within greater Hamilton and responds directly to the identified long-term shortfall in industrial land supply detailed in the Economic Assessment (refer to Industrial North – Appendix 29). The lots provide a range of sizes and configurations capable of accommodating a broad spectrum of anticipated industrial activities, from smaller trade and service businesses through to larger warehousing, distribution and logistics activities. This will increase both the supply and choice of development ready industrial land. The Site is also contiguous with the established Frankton industrial area and strategically located in relation to the Hamilton Southern Links corridor and North Island Main Trunk railway, making it well suited to industrial, employment and freight-generating activities.

The proposal consolidates employment growth as a logical extension of an established industrial area and in close proximity to existing and planned strategic transport infrastructure, rather than establishing a fragmented or isolated industrial location. The internal transport network incorporates walking and cycling infrastructure, providing alternatives to private vehicle travel for future workers. The proximity of the employment precinct to existing and planned residential

	development within the wider SL1 Growth Cell also has the potential to reduce travel distances between homes and employment and support a more efficient urban form. Overall, the Industrial North proposal will provide a diverse and substantial addition to greater Hamilton's industrial land supply in a strategically connected location, while increasing employment opportunities, improving business land choice and competition, integrating with existing and planned transport infrastructure, providing for alternative transport modes and incorporating a coordinated and climate-resilient infrastructure response. The proposal will therefore also achieve Policy 2.2.3c. The Residential South proposal supports the sustainable land use outcomes sought by Policy 2.2.3c, notwithstanding that those outcomes are being achieved through the Fast-track approval rather than a preceding rezoning process. The Residential South proposal will therefore also achieve Policy 2.2.3c
Objective 2.2.4 Greenfield urban development takes place within areas identified for this purpose in a manner which uses land and infrastructure most efficiently.	The proposal is considered generally consistent with Objective 2.2.4. The proposal is a greenfield development and, while the Site is currently zoned Rural and is not identified for urban development through the HCC ODP zoning, it forms part of the strategically identified SL1 Growth Cell and directly adjoins Hamilton's existing urban area. The wider area has been identified through the Future Proof growth framework and associated strategic boundary arrangements as an area intended to accommodate Hamilton's future urban expansion. The proposal therefore represents planned growth in a strategically identified location rather than an isolated or ad hoc greenfield development. The Residential South proposal makes efficient use of the land resource. Approximately 938 dwellings are proposed to be provided through a compact, predominantly medium density form comprising terrace, duplex and detached housing, with an average lot size of approximately 250 m² and more than 80% of residential lots below 300 m². The masterplan integrates this housing with a neighbourhood commercial node, neighbourhood park, the Mangakōtukutuku Stream and wider blue-green network, enabling substantial housing capacity to be

accommodated while also providing the open space, ecological and amenity functions necessary to support a high-quality urban environment.

Infrastructure efficiency has similarly been a key consideration in the development of the proposal. Residential South is contiguous with Hamilton and will connect to the existing transport network through Saxbys Road, Macmurdo Avenue and Forth Crescent, while providing an integrated walking and cycling network and provision for future public transport. Water, wastewater and stormwater infrastructure will be delivered progressively alongside the five-stage development, utilising available existing network capacity in the earlier stages and transitioning to planned strategic infrastructure as the wider southern growth area develops. This staged approach enables infrastructure investment to be coordinated with development demand and avoids unnecessary or premature infrastructure provision.

The proposal will also contribute to the efficient use of future strategic infrastructure by establishing a substantial residential population within the wider southern growth area, including in proximity to Southern Links and planned longer-term water and wastewater infrastructure. The concentration of approximately 938 dwellings within a comprehensively planned growth area will provide a stronger demand base for these investments than a dispersed pattern of peripheral development.

The Industrial North proposal is underpinned by a natural extension to the existing Frankton Industrial area, leveraging off the wider strategic road network, including Kahikatea Drive, Greenwood Street, and the future Hamilton Southern Links, and strategic East / West Collector. Collectively, this will support the agglomeration of industrial activity within the site, and wider existing Frankton industrial area, which utilises both land and infrastructure efficiently and makes best use of the locational attributes of the land.

Accordingly, while there is a distinction between the Site's operative Rural zoning and its strategic identification for future urban growth, that does not detract from the fundamental outcome sought by Objective 2.2.4. Residential South and Industrial North are both compact and comprehensively planned extensions of the existing city

	within an identified strategic growth area, with development coordinated with both existing and future infrastructure. The proposal therefore provides for the efficient use of both land and infrastructure and is considered generally consistent with Objective 2.2.4.
Policy 2.2.4a Development shall occur in locations that are consistent with the growth management policies of the Waikato Regional Policy Statement.	The proposal is considered generally consistent with Policy 2.2.4a. The proposal forms part of the strategically identified SL1 Growth Cell and has been assessed against the growth management framework of the Waikato Regional Policy Statement (WRPS), including the Urban Form and Development provisions and the APP11 Development Principles. The Site directly adjoins Hamilton's existing urban area and the wider SL1 area is recognised through the Future Proof Strategy 2024–2054 as part of the future growth and urban enablement of Hamilton. The proposal will therefore consolidate growth adjacent to the existing city rather than establish a separate or dispersed settlement. Residential South provides for 938 dwellings in a compact, predominantly medium-density form, together with a neighbourhood commercial node, public open space, a connected walking and cycling network and coordinated three-waters and transport infrastructure, and the Industrial North provides for 22 serviced industrial lots which support a range of anticipated industrial uses in a strategically located industrial node. Development will also be staged so that infrastructure provision and network upgrades are coordinated with growth. As assessed against the WRPS, within V2 Attachment 7 and V3 Attachment 7, there are some areas of tension, particularly because the proposal involves greenfield urbanisation of land currently zoned Rural and land presently treated as highly productive land. SL1 Industrial North is located within the Hamilton Airport/Southern Links strategic industrial node, where the WRPS and Future Proof Strategy anticipate substantial industrial growth. The relevant strategic framework provides for approximately 94 ha of industrial land from 2020–2030 and a further 46 ha from 2031–2050 within this

node. Industrial North will contribute approximately 40.1 ha of net industrial land and around 182,000 m² of industrial floorspace, directly supporting that planned growth pattern. It also represents a logical extension of the established Frankton industrial area rather than dispersed industrial development within the wider rural environment.

The development is coordinated with existing and planned infrastructure, including Hamilton Southern Links (HSL), three waters infrastructure and upgrades to the surrounding transport network. The HSL designation passes through Industrial North and has directly informed the industrial layout, road hierarchy and future connections, while the proposal is designed to function without relying on HSL being completed from the outset.

In regard to HPL, for Residential South, the proposal will result in the loss of some land that meets the Waipā District Plan definition of High-Class Soil and is therefore not directly consistent with the direction in Policy to avoid a decline in the availability of high-class soils for primary production. The detailed Soil and Land Use Capability Classification Assessment (refer to **Residential South – Appendix 29**) identifies approximately 13.6 ha (about 30% of the Site) as High Class Soil, rather than the whole Site.

The degree of tension is moderated by the Site's constrained productive characteristics and strategic context. The wider landholding contains organic/peat soils, wetness and drainage limitations, LUC 3 and 4 areas and modified/non-productive land, while the higher quality soils are fragmented. The specialist NPS-HPL assessment (refer to **Residential South – Appendix 26**) identifies enduring physical and operational constraints on viable primary production, including the Southern Links designation and loss/severance of dairy infrastructure, the Site's effective scale and its immediate urban-edge location. The Residential South site is also within the strategically identified SL1 Growth Cell and will provide a compact, comprehensively planned extension of Hamilton, rather than dispersed rural residential development. Accordingly, the policy tension is acknowledged but should be weighed in the context

of the detailed productive-capacity evidence and subsequent strategic direction for urbanisation of the Site.

Overall, the Residential South proposal demonstrates a high degree of alignment with Policy 2.2.4a, where the principal areas of tension arise from the proposal being a greenfield development and involving the urbanisation of land presently treated as highly productive land. Those matters should be acknowledged and afforded appropriate weight. However, the proposal is not an isolated or dispersed urban expansion, it is a compact, comprehensively masterplanned extension of Hamilton within the strategically identified SL1 Growth Cell, providing approximately 938 dwellings with coordinated infrastructure, active mode connections, blue-green infrastructure and substantial ecological and landscape enhancement. When the APP11, within WRPS, principles are considered collectively, the proposal is considered generally consistent with the form, location, integration, sustainability and environmental outcomes sought for new development.

The proposal will result in the permanent conversion of land that is conservatively treated as highly productive land under the transitional NPS-HPL provisions. However, the detailed Soil and Land Use Capability Assessment (refer to Industrial North – Appendix 28) demonstrates that the Site does not contain 'High Class Soil' as defined in the Waipa Operative District Plan and that the regional scale mapping materially overstates the extent and versatility of the land actually available for productive use.

The detailed NPS-HPL assessment addresses the applicable statutory pathways separately. In this context, the proposed conversion is considered appropriate and the extent of conflict with the underlying intent of LF-P11 is materially limited by the Site's constrained, fragmented and modified productive resource

However, these matters need to be considered alongside the Site's strategic growth role, its location contiguous with Hamilton, the efficient and compact form of development proposed, the comprehensive infrastructure response and the environmental and ecological enhancements incorporated into the masterplan. The

	proposal also demonstrates a high degree of alignment with the APP11 Development Principles, including those relating to connectivity, compact urban form, active transport, infrastructure integration, water-sensitive design, climate resilience, biodiversity and tangata whenua values. Accordingly, while the proposal does not align with every element of the WRPS growth management framework without qualification, the WRPS provisions considered as a whole support planned, compact and infrastructure-coordinated urban growth in appropriate locations. The Residential South and Industrial North proposals represent such a form of development within a strategically identified growth area adjoining Hamilton. The proposals are therefore considered generally consistent with Policy 2.2.4a.
Policy 2.2.4b Any development that is within an identified growth area is to be undertaken in general accordance with an approved Structure Plan.	Policy 2.2.4b is of limited direct relevance to the proposal. While the Residential South and Industrial North sites form part of the identified SL1 Growth Cell, there is no approved Structure Plan under the operative District Plan applying to the Site against which the development can be assessed for general accordance. Notwithstanding this, the proposal has been subject to comprehensive structure planning and masterplanning through the wider SL1 planning process. The Masterplan (refer to Residential South - Appendix 6 and Industrial North Appendix 6) provides an integrated framework for land use, movement, open space, blue-green infrastructure and three waters servicing and has been informed by the wider strategic planning undertaken for the SL1 Growth Cell. Accordingly, while the proposal cannot demonstrate general accordance with an approved Structure Plan as specifically contemplated by Policy 2.2.4b, it adopts the comprehensive and coordinated approach to development that underlies the policy.
Policy 2.2.4c The release of land for urban development will not be allowed unless appropriate infrastructure is available and the servicing of this land does not compromise the efficiency and sustainability of planned infrastructure.	The proposal is considered consistent with Policy 2.2.4c. The Residential South and Industrial North developments have been comprehensively planned to ensure that urban development is coordinated with the availability and capacity of the transport and three waters infrastructure necessary to service it. The Infrastructure Report

(refer to Residential South - Appendix 13 and Industrial North – Appendix 13) establishes a staged servicing strategy aligned with the five stage development programme for residential and industrial, so that infrastructure is provided progressively as development occurs.

For water and wastewater, the proposal provides for interim connections to existing Hamilton networks where sufficient capacity is available, followed by integration with planned longer term strategic infrastructure as the wider southern growth area develops. Alternative solutions are presented in the Maven Infrastructure Reports V2 Appendix 13 and V3 Appendix 13, notwithstanding these alternatives, a temporary wastewater trucking solution, should that be conditioned or included as part of the Application via panel consideration, can also be considered as an interim servicing measure for wastewater generated by the residential and industrial activities. This wastewater could be collected in appropriately designed storage facilities and transported by sealed tanker to an authorised wastewater treatment facility, likely the Cambridge Treatment Plant, like the Hamilton Airport current servicing approach. This servicing arrangement, if conditioned or included as part of the Application (which it currently is not) would operate only until the permanent wastewater servicing solution was available.

Stormwater will be managed through an integrated on-site system incorporating retention and soakage, a reticulated network, six constructed wetlands, defined overland flow paths and controlled discharge. Transport infrastructure will similarly be delivered progressively, with connections to the existing network through Saxbys Road, Macmurdo Avenue and Forth Crescent for Residential South and Greenwood Street / Kahikatea Drive for Industrial North with identified external upgrades, walking and cycling infrastructure and provision for future public transport identified.

Importantly, the proposal does not assume that all existing infrastructure can accommodate the full development from the outset. The staging and proposed servicing framework enable development to be aligned with available network capacity and the delivery of necessary upgrades and longer-term strategic solutions.

	The proposal has also been planned having regard to future infrastructure serving the wider southern growth area, including Southern Links and future strategic water and wastewater infrastructure, so that development does not prejudice their efficient future delivery or operation. Accordingly, the Residential South and Industrial North proposals represent infrastructure led and staged urban development, with servicing coordinated with development rather than occurring independently of it. The proposals are therefore considered consistent with Policy 2.2.4c, as appropriate infrastructure will be available to service development as it proceeds and the development is not expected to compromise the efficiency or sustainability of planned infrastructure.
Policy 2.2.4d The subdivision or use of any rural land within an identified growth area shall not compromise future urban development.	The proposal is considered consistent with Policy 2.2.4d. The Residential South and Industrial North sites form part of the identified SL1 Growth Cell and, rather than introducing an interim rural subdivision or land use that could constrain future urbanisation, the proposal itself provides for the comprehensively planned urban development of the Site. The Masterplan (refer to **Residential South - Appendix 6 and Industrial North – Appendix 6**) establishes an integrated urban framework for approximately 938 dwellings, a neighbourhood commercial node, open space, the blue-green network and transport and three waters infrastructure for Residential South, and 22 serviced industrial lots, transport and three waters infrastructure for Industrial North. Development will occur progressively across five stages, with the layout and servicing strategy designed to integrate with both the existing Hamilton urban area and the future development of the wider SL1 Growth Cell. The proposal has also been designed to avoid prejudicing future strategic infrastructure or connectivity. For Residential South the movement network provides connections to Saxbys Road, Macmurdo Avenue and Forth Crescent, together with provision for future public transport and integration with the wider transport network. For Industrial North the movement network provides connections primarily

	to Kahikatea Drive / Greenwood Street and secures a strategic east-west industrial collector. Water and wastewater servicing similarly provides for transition from interim network connections to longer-term strategic solutions as the wider southern growth area develops. Accordingly, the proposals will facilitate rather than compromise the future urban development of the identified growth area, establishing a coordinated urban form and infrastructure framework that can integrate with subsequent development of the wider SL1 Growth Cell. The proposals are therefore considered consistent with Policy 2.2.4d.
Objective 2.2.5 Promote safe, compact, sustainable, good quality urban environments that respond positively to their local context, recognising that further change may occur through intensification.	The proposal is considered consistent with Objective 2.2.5. Residential South and Industrial North developments will establish a safe, compact and comprehensively planned urban environment that responds to its local context while providing a flexible urban form capable of accommodating changing community needs over time. The Urban Design Assessment (refer to **Residential South - Appendix 10 and Industrial North – Appendix 10**) confirms that the masterplan provides a coherent and connected urban structure, with approximately 938 dwellings across a range of terrace, duplex and detached housing typologies, in addition to 22 serviced industrial lots and supporting infrastructure. In regard to Residential South the relatively compact residential form makes efficient use of the Site, while the distribution of densities responds to context, with higher density housing generally concentrated internally and around key amenities and movement routes and lower intensity development and landscape treatments used toward more sensitive interfaces. The proposed Design Guidelines (refer to **Residential South - Appendix 9**) provide further direction to achieve high-quality buildings, streetscapes, landscaping and interfaces as development occurs. The Industrial North site is designed to be an extension of the existing Frankton Industrial area, with a layout and lot sizes that support a mix of industrial uses.

The neighbourhood has been designed to support safety, accessibility and connectivity. A legible and interconnected street network, pedestrian and cycling facilities, passive surveillance and CPTED principles are incorporated throughout the development. The masterplan integrates residential development with a centrally located neighbourhood park and commercial node, the Mangakōtukutuku Stream and wider blue-green network, providing convenient access to local services, recreation and open space and supporting walking and cycling for everyday trips. Provision is also made for future public transport.

The proposal responds positively to its local context. The Residential South site directly adjoins the established Hamilton urban area at Glenview and Deanwell and forms part of the strategically identified SL1 Growth Cell. While development will change the Site from a predominantly rural environment to an urban neighbourhood, that change occurs within an area identified for Hamilton's future growth. The layout responds to the Mangakōtukutuku Stream, existing and planned transport connections, Resthills Park and the remaining rural interfaces, with riparian restoration, indigenous planting, open-space corridors and landscape treatments contributing to the character and amenity of the resulting neighbourhood.

The Industrial North site responds positively to its local context, integrating with the planned Hamilton Southern Links designation, wider Frankton Industrial area and supporting nodes.

The proposal also incorporates sustainability and resilience through its compact form, active mode connections, provision for future public transport, water sensitive stormwater management, ecological restoration and infrastructure designed for future climate change conditions. The range of housing typologies and adaptable urban structure also provide capacity to respond to changing housing needs and the evolving character of the wider growth area over time.

Overall, the proposal will establish a safe, compact, sustainable and high-quality urban environment that responds appropriately to both its existing context and its planned role within Hamilton's future urban area. The proposal therefore aligns

	strongly with Objective 2.2.5, including its recognition that urban character and amenity will continue to evolve as the city grows and intensifies.
Policy 2.2.5a Development responds to best practice urban design and sustainable development principles, appropriate to its context.	The proposal is considered consistent with Policy 2.2.5a, as it has been comprehensively masterplanned in accordance with best practice urban design and sustainable development principles, while responding to the Site's particular environmental, landscape and infrastructure context. The Urban Design Assessment (refer to **Residential South - Appendix 10**) confirms that the masterplan establishes a compact, legible and connected neighbourhood, providing approximately 938 dwellings across terrace, duplex and detached housing typologies. The layout integrates housing with a centrally located neighbourhood park and commercial node, the Mangakōtukutuku Stream and wider blue-green network, and a connected hierarchy of streets, walking and cycling routes. Higher residential densities are generally concentrated internally and around key amenities and movement routes, with lower intensity development and landscape treatments providing appropriate transitions toward sensitive interfaces. The Design Guidelines (refer to **Residential South - Appendix 9**) provide further controls to achieve high-quality built form, coherent streetscapes, landscaping, passive surveillance and appropriate relationships between buildings and public spaces. The Urban Design Assessment (refer to **Industrial North – Appendix 10)** confirms that the masterplan establishes a legible, connected industrial precinct that provides for 22 serviced industrial lots of varying sizes. Both the Residential South and Industrial North proposals incorporate sustainable development principles through efficient use of land, prioritisation of walking and cycling, provision for future public transport, water-sensitive stormwater management and ecological restoration. Stormwater infrastructure is integrated with the open-space and blue-green network and designed for future climate change conditions, while riparian and indigenous planting will enhance ecological values and contribute to neighbourhood amenity.

	Importantly, the Residential South design responds to the Site's local context, including its relationship with the established Hamilton urban area at Glenview and Deanwell, Resthills Park, the Mangakōtukutuku Stream, remaining rural interfaces and existing and planned infrastructure. While the proposal will substantially change the existing rural character, this transition is appropriate in the context of the Site's location within the strategically identified SL1 Growth Cell and its intended future urban role. Overall, the proposal applies best practice urban design and sustainability principles in a manner tailored to the opportunities and constraints of the Site, resulting in a compact, connected, attractive and resilient urban neighbourhood, consistent with Policy 2.2.5a.
Policy 2.2.5b Development responds to Low Impact Urban Design and Development and Crime Prevention Through Environmental Design (CPTED) principles	The proposal is considered consistent with Policy 2.2.5b, as the design of Residential South incorporates both Low Impact Urban Design and Development (LIUDD) and Crime Prevention Through Environmental Design (CPTED) principles as integral components of the masterplan. In relation to LIUDD, the development incorporates a comprehensive blue-green and water sensitive design approach. Stormwater will be managed through a treatment train comprising on-lot retention and soakage, rainwater tanks, a reticulated network, swales and six constructed wetlands, together with controlled discharge and defined overland flow paths. The masterplan also integrates the Mangakōtukutuku Stream, riparian restoration, indigenous planting and stormwater infrastructure with the wider open-space network. This approach manages stormwater close to source, supports groundwater recharge and water quality, responds to existing hydrological processes and provides resilience to future climate change conditions, while also delivering ecological, landscape and recreational benefits. The Urban Design Assessment (refer to **Residential South - Appendix 10**) also confirms that CPTED principles have informed the layout. Streets, walking and cycling routes,

	the neighbourhood park, commercial node and other public spaces are positioned and designed to encourage activity and passive surveillance from adjoining development. The connected and legible street network provides clear movement routes and avoids unnecessary isolation of public spaces, while the orientation of development toward streets and open spaces supports visibility, safety and a sense of ownership. The Design Guidelines (refer to **Residential South - Appendix 9**) provide further direction for the relationship between buildings, streets, landscaping and public spaces. Overall, LIUDD and CPTED principles are embedded within the landform, stormwater, open space, movement and built form response, rather than being treated as separate design considerations. The proposal will therefore create a water sensitive, resilient, connected and safe urban environment, consistent with Policy 2.2.5b.
Policy 2.2.5c Development enhances civic, natural heritage, cultural, ecology and surrounding public spaces.	The proposal is considered consistent with Policy 2.2.5c, as Residential South has been designed to enhance the natural, ecological, cultural and public-space values of the Site as part of its transition to an urban neighbourhood. The masterplan is structured around a network of public and blue-green spaces, including the Mangakōtukutuku Stream and riparian corridor, a centrally located 3,200 m² neighbourhood park, stormwater wetlands, walking and cycling connections and links to Resthills Park and the surrounding street network. These spaces are integrated with the residential areas and neighbourhood commercial node to provide accessible recreational and amenity opportunities and contribute to a strong and identifiable public realm. Natural heritage and ecological values are enhanced through the retention and protection of Wetland B, riparian restoration, indigenous planting and approximately 4.6 ha of habitat enhancement and restoration planting across the development. The loss of the degraded Wetland A will be addressed through approximately 348 m² of compensatory indigenous wetland habitat, while additional habitat enhancement and compensation is proposed for long-tailed bats. Collectively, these measures will

	improve indigenous vegetation, habitat quality and ecological connectivity within the presently modified pastoral environment. Cultural values have also informed the development through engagement with the SL1 Tangata Whenua Working Group and the Cultural Impact Assessment (refer to **Residential South - Appendix 24**). This has influenced the treatment of whenua and wai, particularly the Mangakōtukutuku Stream corridor, indigenous planting and ecological restoration, and provides opportunities for cultural expression and ongoing kaitiakitanga. Accordingly, the proposal does more than provide for the urbanisation of the Site. It uses the development as an opportunity to establish and enhance a connected network of ecological, cultural, recreational and civic spaces that will contribute to the identity and amenity of the new neighbourhood and its connections with the surrounding community. The proposal is therefore considered consistent with Policy 2.2.5c.
Policy 2.2.5d Development considers the objectives and policies in Chapter 25.15.	The Residential South and Industrial North proposals are considered consistent with Policy 2.2.5d. The objectives and policies in Chapter 25.15 – Urban Design seek high-quality urban environments through the maintenance and enhancement of amenity, appropriate responses to context, CPTED and personal safety, sustainable energy use, and the integration of land use and transport through connected and permeable movement networks. These matters have been comprehensively addressed through the Urban Design Assessment (refer to **Residential South - Appendix 10**) and the Design Guidelines (refer to **Residential South - Appendix 9**). The proposal provides a compact and coherent urban form with a connected street hierarchy, a range of housing typologies, appropriate transitions at its interfaces and a strong relationship between buildings, streets and public spaces. The masterplan incorporates CPTED principles, including passive surveillance and legible and well-connected public spaces, to support personal safety.

	The proposal also responds strongly to the Chapter 25.15 emphasis on integrating land use, transport and open-space networks. Walking and cycling connections are incorporated throughout the Site and connect with the surrounding street network, Resthills Park, the neighbourhood park and the Mangakōtukutuku Stream and blue-green corridors. The street network also provides for future public transport, while the centrally located neighbourhood commercial node and park support a compact and walkable neighbourhood. These outcomes align particularly with the Chapter 25.15 direction to promote walking and cycling, connect development with public reserves and green corridors, and establish permeable and sustainable transport networks. The industrial north layout links in with existing pedestrian and shared path corridors on Greenwood Street / Kahikatea Drive and as part of the east / west collector road will future proof wider active mode connections. Accordingly, the proposal has appropriately considered and responds to the relevant Chapter 25.15 objectives and policies, with the masterplan demonstrating a comprehensive urban design response that will create a connected, safe, attractive and sustainable neighbourhood. The proposal is therefore consistent with Policy 2.2.5d.
Objective 2.2.6 Establish and maintain a hierarchy of viable and vibrant business centres that provide a focus for retail, commercial and entertainment activities and serve the social, cultural, environmental and economic needs of the community.	The Residential South proposal is considered generally consistent with Objective 2.2.6. It is proposed to include a small neighbourhood commercial node intended to provide convenient day to day services for the approximately 938 dwellings proposed, rather than establish a competing higher order commercial centre. This is consistent with the District Plan's centres hierarchy, which recognises neighbourhood centres as serving local residential areas and seeks to maintain the function and viability of the wider hierarchy. The commercial node is centrally located alongside the neighbourhood park and connected walking and cycling network, supporting a focal point for community activity and contributing to a walkable neighbourhood. Its limited scale and local

	serving function will complement, rather than undermine, established suburban and higher-order centres. The Industrial North precinct includes the provision for a food and beverage node and reflects supporting amenities for the industrial activities. Therefore, both proposals and the Project are considered consistent with Objective 2.2.6.
Policy 2.2.6a Business activity and development shall locate in the most appropriate centre for its role, according to the following hierarchy: (i) The Central City is the primary business centre, serving the City and wider region, and is the preferred location for commercial, civic and social activities. (ii) The Base and Chartwell complement the Central City, to serve large parts of the City and adjoining districts, and contain primarily retailing, entertainment and services. (iii) Suburban centres, to provide convenience goods, community services, facilities and employment to serve immediate suburban catchments (iv) Ruakura Retail Centre, to serve the Ruakura Structure Plan area and adjacent catchment. (v) Neighbourhood centres, to contain retailing and service activities to serve immediate residential catchments.	The Residential South proposal is considered consistent with Policy 2.2.6a. The proposed commercial node is appropriately scaled and located to function as a neighbourhood centre, providing a limited range of retail and service activities to meet the day to day needs of the approximately 938 dwellings within the Residential South site and the immediate surrounding catchment. Its scale and local serving function are not intended to compete with higher order suburban or city centres. Rather, it will complement the established centres hierarchy while supporting a walkable neighbourhood by locating everyday services close to residents. The Residential South proposal is therefore consistent with Policy 2.2.6a. The Industrial North precinct includes the provision for a food and beverage node and reflects supporting amenities for the industrial activities and is aligned with Policy 2.2.6a.
Policy 2.2.6b The distribution, type, scale and intensity of activities outside the Central City does not undermine the viability, vitality and vibrancy of the Central City, its amenity values, or role in meeting the needs of the region.	Policy 2.2.6b is of limited relevance, as the proposal does not provide for commercial activities of a scale or nature that could affect the role or viability of the Central City. The proposed commercial node is small scale and intended to serve the immediate Residential South catchment, with the food and beverage node within the Industrial

	North designed for the immediate industrial catchment. Accordingly, it will not undermine the viability, vitality, vibrancy or amenity of the Central City.
Policy 2.2.6c Significant large format retail development beyond the identified out of centre zones is not envisaged for the Plan period.	Policy 2.2.6c is not directly relevant, as the proposal does not provide for significant large format retail development. The proposed commercial node is small scale and intended to provide neighbourhood level retail and services only to the immediate Residential South catchment. In addition, the Industrial North precinct does not include the provision for large format retail development. Accordingly, the proposal does not conflict with Policy 2.2.6c.
Policy 2.2.6d Residential activity above ground floor commercial uses is encouraged where it can be shown to support the business centres and meet the day-to-day needs of residents, achieve attractive and safe streets and public open spaces, including by providing for passive surveillance.	Policy 2.2.6d is of limited relevance, as the proposal does not specifically rely on residential activity above ground floor commercial uses. The proposed neighbourhood commercial node is intended to serve the immediate Residential South catchment and is integrated with surrounding residential development, the neighbourhood park and public spaces to support activity and passive surveillance. Accordingly, the proposal does not conflict with Policy 2.2.6d.
Objective 2.2.8 Sufficient feasible, reasonably expected to be realised development capacity for housing is provided to meet the bottom lines in the table below: <table><tr><td colspan="4">Housing bottom lines (number of dwellings)</td></tr><tr><td>Area</td><td>Short to Medium 1-10 years (2020 – 2030)</td><td>Long term 11-30 years (2031 – 2050)</td><td>Total</td></tr><tr><td>Hamilton City</td><td>14,300</td><td>28,800</td><td>43,100</td></tr></table>	Objective 2.2.8 is not relevant for the Industrial North proposal. The Residential South proposal is considered consistent with Objective 2.2.8, as the proposal will make a substantial contribution to Hamilton's identified housing development capacity. The proposal will deliver approximately 938 dwellings across a range of terrace, duplex and detached housing typologies within the strategically identified SL1 Growth Cell. The development represents a significant addition to housing supply in a location contiguous with Hamilton's existing urban area and will be delivered progressively alongside the necessary infrastructure. It will therefore contribute directly toward meeting Hamilton's identified housing bottom lines and providing sufficient feasible and reasonably expected to be realised development capacity over the relevant planning period.

	Accordingly, the proposal strongly supports Objective 2.2.8 by enabling additional housing capacity at scale within an identified future growth area.
Objective 2.2.9 A range of housing types and densities is available to meet the housing needs and demand and a neighbourhood's planned urban built character.	Objective 2.2.9 is not relevant for the Industrial North proposal. The proposal is considered consistent with Objective 2.2.9. The Residential South proposal will provide approximately 938 dwellings across a range of housing types and densities, including terrace, duplex and detached housing, providing choice for different household sizes, needs and preferences. The Masterplan (refer to **Residential South - Appendix 6**) and Urban Design Assessment (refer to **Residential South - Appendix 10**) provide for a predominantly medium density neighbourhood, with higher densities generally concentrated internally and around key amenities, open spaces and movement routes, and lower density housing used toward more sensitive interfaces. This distribution supports efficient use of land while providing appropriate transitions in built form and character. The range of housing typologies and densities therefore provides substantial housing choice while establishing a coherent planned urban character appropriate to Residential South and its role within the wider SL1 Growth Cell. The proposal is therefore consistent with Objective 2.2.9.
Policy 2.2.9a Residential development enables a variety of household choices and meets diverse cultural and social needs.	Policy 2.2.9a is not relevant for the Industrial North proposal. The Residential South proposal is considered consistent with Policy 2.2.9a. Residential South will provide approximately 938 dwellings across a range of terrace, duplex and detached housing typologies, with varying lot sizes and densities. This diversity will provide greater housing choice and enable the neighbourhood to accommodate a range of household sizes, life stages and housing needs. The mix of housing is supported by a comprehensively planned neighbourhood incorporating accessible open space, a neighbourhood commercial node, walking and cycling connections and opportunities for future public transport. The proposal has

	also been informed by engagement with the SL1 Tangata Whenua Working Group and the Cultural Impact Assessment (refer to **Residential South - Appendix 24**), enabling cultural values and aspirations to influence the development response. Overall, the range of housing types and supporting neighbourhood amenities will provide for diverse social and cultural needs and greater household choice, consistent with Policy 2.2.9a.
Policy2.2.9b High-density residential areas are located within the walkable catchment of the Central City, adjacent to identified commercial centres, and key public transport corridors to support these areas.	Policy 2.2.9b is not relevant for the Industrial North proposal. The proposal is considered generally consistent with Policy 2.2.9b. The Residential South development provides a predominantly medium density residential environment, with terrace and other higher-density housing typologies generally concentrated internally and close to the neighbourhood commercial node, open spaces and key movement routes. The Site is not within walking distance of the Central City or an existing key public transport corridor. However, the masterplan provides for future public transport through the development, together with a comprehensive walking and cycling network. The concentration of higher-density housing around the neighbourhood centre and movement network will support the viability and accessibility of these services as the wider SL1 Growth Cell develops. Accordingly, while the locational direction of the policy is not met in all respects, the proposal applies its underlying principle by locating higher-density housing close to local amenities and routes capable of supporting future public transport.
Objective 2.2.10 Hamilton's unique history, heritage and identity are reflected in its built environment.	The Residential South and Industrial North proposals are considered consistent with Objective 2.2.10. The Residential South proposal will establish a new urban neighbourhood and does not contain identified heritage buildings or recorded archaeological sites that would directly contribute to Hamilton's existing built heritage. The Archaeological Assessment (refer to **Residential South - Appendix 25**)

	nevertheless provides for the appropriate management of any previously unidentified archaeological material through accidental discovery procedures. The Industrial North proposal contiguously extends the existing Frankton Industrial area, within land that is not known to have any heritage or unique identity. More broadly, the Project recognises the cultural and historical identity of the wider area through engagement with the SL1 Tangata Whenua Working Group and the Cultural Impact Assessment (refer to **Residential South - Appendix 24 and Industrial North – Appendix 24**). Mana whenua values and associations with the whenua, wai and wider ancestral landscape have informed the development response, including the treatment of the Mangakōtukutuku Stream corridor, indigenous planting and opportunities for cultural expression within the landscape and public realm. Accordingly, while the proposal is creating a new built environment rather than retaining an established heritage character, it provides opportunities for the history, cultural associations and identity of the area to be reflected in the character and design of the new neighbourhood, consistent with Objective 2.2.10.
Policy 2.2.10a Development is sensitive to and enhances Hamilton's identity and heritage values.	The Project is considered consistent with Policy 2.2.10a. The Residential South proposal does not contain identified heritage buildings or recorded archaeological sites that would be adversely affected by the development. The Archaeological Assessment (refer to **Residential South - Appendix 25 and Industrial North – Appendix 25**) nevertheless both provide for accidental discovery procedures to appropriately manage any previously unidentified archaeological material. The proposal also responds to the wider cultural identity and history of the area through engagement with the SL1 Tangata Whenua Working Group and the Cultural Impact Assessment (refer to **Residential South - Appendix 24 and Industrial North – Appendix 24**). This has informed the treatment of the Mangakōtukutuku Stream corridor, upper wider catchment of Waitawhiriwhiri Stream, indigenous planting and opportunities to incorporate cultural narratives and expression within the landscape and public realm.

	Accordingly, the development provides an appropriate basis for the cultural and historical identity of the area to be recognised and expressed within the new neighbourhood, while protecting identified heritage and archaeological values, consistent with Policy 2.2.10a.
Policy 2.2.10b Development is sensitive to and protects Hamilton's identified built heritage and historic heritage values.	The proposal is considered consistent with Policy 2.2.10b. The site does not contain any identified built heritage features or recorded archaeological sites that would be directly affected by the development. Accordingly, the proposal will not result in the loss or degradation of Hamilton's identified built heritage values. The Archaeological Assessment (refer to **Residential South - Appendix 25**) also provides for accidental discovery procedures to appropriately manage any previously unidentified archaeological material encountered during earthworks. The proposal is therefore sensitive to and appropriately protects identified built and historic heritage values, consistent with Policy 2.2.10b.
Policy 2.2.10c Development is sensitive to and protects Hamilton's archaeological and cultural heritage sites, structures, areas, landscapes and places.	The proposal is considered consistent with Policy 2.2.10c. The Archaeological Assessment (refer to **Residential South - Appendix 25**) identifies no recorded archaeological sites within the development area and no identified archaeological or historic heritage features will be directly affected. Accidental discovery procedures will apply during earthworks to ensure that any previously unidentified archaeological material is appropriately managed. The wider cultural heritage values and ancestral associations of the Site have also been considered through engagement with the SL1 Tangata Whenua Working Group and the Cultural Impact Assessment (refer to **Residential South - Appendix 24**). This has informed the treatment of culturally important elements of the landscape, particularly the Mangakōtukutuku Stream and associated waterways, riparian restoration and opportunities for cultural expression and ongoing kaitiakitanga. Accordingly, the proposal appropriately recognises and protects archaeological and cultural heritage values, consistent with Policy 2.2.10c.

Policy 2.2.10d Development provides for the protection of historic and cultural heritage from inappropriate subdivision, use and development.	The proposal is considered consistent with Policy 2.2.10d. The Archaeological Assessment (refer to **Residential South - Appendix 25**) identifies no recorded archaeological sites within the development area and no identified historic heritage features will be adversely affected by the proposal. Accidental discovery procedures will apply during earthworks to ensure any previously unidentified archaeological material is appropriately protected and managed. Cultural heritage values have also been considered through the Cultural Impact Assessment (refer to **Residential South - Appendix 24**) and engagement with the SL1 Tangata Whenua Working Group, with these values informing the treatment of the Mangakōtukutuku Stream, associated waterways and wider landscape. Accordingly, the proposal provides appropriate mechanisms to protect historic and cultural heritage from inappropriate subdivision and development, consistent with Policy 2.2.10d.
Objective 2.2.11 Protect and enhance natural character, natural features and landscapes, ecosystems and indigenous biodiversity.	The proposal is considered generally consistent with Objective 2.2.11. While the development will substantially modify the existing rural landscape, the Site is a highly modified pastoral environment and the proposal has been designed to protect the more important natural and ecological features while providing substantial opportunities for restoration and enhancement. The Mangakōtukutuku Stream and associated riparian corridor form a central component of the masterplan and wider blue-green network, with riparian restoration and indigenous planting proposed to improve natural character, freshwater habitat and ecological connectivity. Wetland B will be retained and protected, while the unavoidable loss of approximately 285 m² of degraded Wetland A will be addressed through approximately 348 m² of compensatory indigenous wetland habitat. The proposal also includes approximately 4.6 ha of habitat enhancement and restoration planting, together with specific management and compensation measures for long-tailed bats and management measures for indigenous birds, lizards and freshwater fauna.

The Landscape Visual Impact Assessment (refer to Residential South - Appendix 12) acknowledges the transition from a rural to urban landscape and the resulting adverse landscape and visual effects. However, the landscape response integrates the stream corridor, wetlands, open spaces and substantial planting into the development, helping establish a strong blue-green framework and enhance the natural features that will remain within the Site.

Overall, although the existing rural landscape character will change, the proposal will protect the Site's more important natural features and biodiversity values and materially increase the extent, quality and connectivity of indigenous habitat within the presently modified environment. The proposal is therefore considered generally consistent with Objective 2.2.11.

Regarding the Industrial North site, the existing Site is a highly modified environment comprising predominantly intensively managed pasture, existing industrial and fill areas, the Hamilton refuse transfer station and an artificial farm drainage network, including drains along the southern and eastern boundaries of the development area. The Ecological Impact Assessment (EcIA) (refer to Industrial North EcIA Appendix 23) identifies a high level of ecological disturbance across the Site, with minimal indigenous terrestrial vegetation and limited habitat value for indigenous lizards, birds and bats. The freshwater features within the Site are predominantly artificial watercourses of negligible to low ecological value, with shortfin eel the only fish species recorded, and no natural inland wetlands have been identified within the Industrial North Site (Ecological Assessment – Industrial North Appendix 23). Notwithstanding this modified existing environment, the proposal has been designed around a comprehensive and integrated freshwater, groundwater and stormwater management response that seeks to protect the health and well-being of freshwater and downstream receiving environments while enabling the Site to transition to a comprehensively planned industrial area.

The Site falls immediately outside the draft Mangakootukutuku Integrated Catchment Management Plan ("ICMP") area and ultimately discharges to the

	Waitawhiriwhiri West Stream. While an ICMP has not yet been prepared specifically for the Site's receiving catchment, its proximity to the Mangakootukutuku catchment has informed the proposed design response. Accordingly, the stormwater management strategy has adopted an approach generally consistent with the principles and performance expectations of the Mangakootukutuku ICMP. The Stormwater Management Plan (refer to **Industrial North - Appendix 14**) applies a treatment-train and Water Sensitive Urban Design approach incorporating source control and initial abstraction, grass-lined swales, forebays, three constructed stormwater wetlands, extended detention and controlled discharge, together with on-lot measures such as soakage or rainwater harvesting, soakage trenches, rain gardens, swales and the use of appropriate roofing materials. Collectively, these measures are intended to manage both stormwater quality and quantity, maintain the hydraulic function of the wider drainage network and protect downstream receiving environments. The freshwater response has also been informed by tangata whenua values. Tangata whenua have been involved through the SL1 Tangata Whenua Working Group, and the Cultural Impact Assessment(refer to **Industrial North – Appendix 24**) has considered the technical stormwater, hydrogeological and ecological responses through the framework of Te Awa Koiora, Te Ture Whaimana o Te Awa o Waikato and the Waikato-Tainui Environmental Plan. The Cultural Impact Assessmentidentifies the integrated stormwater approach as providing opportunities to support the mauri of wai through improved water quality, reduced contaminant loads, more resilient catchment processes and ecological enhancement, while also providing for ongoing mana whenua involvement through detailed design, implementation and monitoring. Overall, the Industrial North proposal is considered generally consistent with Objective 2.2.11.
Policy 2.2.11a	The proposal is considered generally consistent with Policy 2.2.11a. The Residential South development will result in the urbanisation of a presently rural landscape. However, the Site is a highly modified pastoral environment and the development

Land use and development protects natural character, natural features and landscapes and ecosystems and promotes positive outcomes for indigenous biodiversity in the Waikato region.	has been designed to protect and enhance its more important natural and ecological features. The Mangakōtukutuku Stream and riparian corridor are retained as a central component of the blue-green network, with substantial indigenous riparian restoration and habitat enhancement proposed. Wetland B will be retained and protected, while the unavoidable loss of approximately 285 m² of degraded Wetland A will be addressed through approximately 348 m² of compensatory indigenous wetland habitat. More broadly, approximately 4.6 ha of habitat enhancement and restoration planting is proposed, together with specific management and compensation measures for long-tailed bats and measures to protect indigenous birds, lizards and freshwater fauna. The Landscape Visual Impact Assessment (refer to Residential South - Appendix 12) also confirms that, while the proposal will change the existing rural landscape character, the integration of waterways, wetlands, open space and extensive planting will assist in establishing a strong landscape framework for the development. Regarding the Industrial North site, the existing Site is a highly modified environment comprising predominantly intensively managed pasture, existing industrial and fill areas, the Hamilton refuse transfer station and an artificial farm drainage network, including drains along the southern and eastern boundaries of the development area. The Ecological Impact Assessment (EcIA) (refer to Industrial North EcIA Appendix 23) identifies a high level of ecological disturbance across the Site, with minimal indigenous terrestrial vegetation and limited habitat value for indigenous lizards, birds and bats. The freshwater features within the Site are predominantly artificial watercourses of negligible to low ecological value, with shortfin eel the only fish species recorded, and no natural inland wetlands have been identified within the Industrial North Site (Ecological Assessment – Industrial North Appendix 23). Notwithstanding this modified existing environment, the proposal has been designed around a comprehensive and integrated freshwater, groundwater and stormwater management response that seeks to protect the health and well-being of freshwater

	and downstream receiving environments while enabling the Site to transition to a comprehensively planned industrial area. Accordingly, while the existing rural landscape will be modified, the proposal protects the Site's key natural features and promotes positive indigenous biodiversity outcomes through substantial restoration, enhancement and improved ecological connectivity, consistent with Policy 2.2.11a.
Policy 2.2.11b Land use and development maintains the extent, and where possible, enhances ecological corridors	The Residential South proposal is considered consistent with Policy 2.2.11b. The masterplan retains the Mangakōtukutuku Stream and associated riparian corridor as a key component of the wider blue-green network and provides for substantial indigenous planting and habitat restoration along waterways, wetlands and open-space corridors. Approximately 4.6 ha of habitat enhancement and restoration planting is proposed, together with retention and protection of Wetland B and creation of approximately 348 m² of compensatory indigenous wetland habitat associated with the loss of Wetland A., as outlined in the V2 Appendix 23 Ecological Impact Assessment and Management Plans. These measures will strengthen connections between existing freshwater and terrestrial habitats and improve opportunities for movement and dispersal of indigenous fauna, including long-tailed bats, birds and freshwater species. Accordingly, the proposal will maintain and materially enhance ecological corridors and habitat connectivity within what is currently a highly modified pastoral environment, consistent with Policy 2.2.11b. Regarding the Industrial North site, the existing Site is a highly modified environment comprising predominantly intensively managed pasture, existing industrial and fill areas, the Hamilton refuse transfer station and an artificial farm drainage network, including drains along the southern and eastern boundaries of the development area. The Ecological Impact Assessment (EcIA) (refer to Industrial North EcIA Appendix 23) identifies a high level of ecological disturbance across the Site, with minimal

	indigenous terrestrial vegetation and limited habitat value for indigenous lizards, birds and bats. The freshwater features within the Site are predominantly artificial watercourses of negligible to low ecological value, with shortfin eel the only fish species recorded, and no natural inland wetlands have been identified within the Industrial North Site (Ecological Assessment – Industrial North Appendix 23). Notwithstanding this modified existing environment, the proposal has been designed around a comprehensive and integrated freshwater, groundwater and stormwater management response that seeks to protect the health and well-being of freshwater and downstream receiving environments while enabling the Site to transition to a comprehensively planned industrial area. Accordingly, the proposal will maintain and materially enhance ecological corridors and habitat connectivity, where relevant, within what is currently a highly modified environment, consistent with Policy 2.2.11b.
Objective 2.2.12 Efficient use and development of natural and physical resources, especially land, buildings and infrastructure.	The proposals are considered consistent with Objective 2.2.12, as the Residential South and Industrial North proposals provide for the efficient use and development of land and infrastructure through a compact, comprehensively planned and staged urban development. The Residential South proposal will provide approximately 938 dwellings across a range of terrace, duplex and detached housing typologies, achieving a relatively high residential density and making efficient use of land within the strategically identified SL1 Growth Cell. Residential development is integrated with a neighbourhood commercial node, open space, the blue-green network and a connected movement network, enabling multiple land-use, recreational and environmental functions to be accommodated within the Site. Infrastructure has similarly been planned comprehensively and will be delivered progressively alongside the five stage development. The proposal will utilise available existing transport and three waters infrastructure where appropriate before transitioning to planned longer-term strategic solutions, avoiding unnecessary

	duplication and coordinating investment with development demand. The integrated stormwater system also provides multiple functions, including water treatment, flood management, ecological habitat, open space and amenity. The Industrial North site will provide 22 serviced industrial lots over 41.4ha of net industrial land, enabling approximately 182,000m2 of future industrial and associated floorspace within the strategically identified SL1 Growth Cell adjoining the established Frankton industrial area. This represents a substantial addition to industrial capacity within greater Hamilton and responds directly to the identified long-term shortfall in industrial land supply detailed in the Economic Assessment (refer to Industrial North – Appendix 29). The lots provide a range of sizes and configurations capable of accommodating a broad spectrum of anticipated industrial activities, from smaller trade and service businesses through to larger warehousing, distribution and logistics activities. This will increase both the supply and choice of development ready industrial land. The Site is also contiguous with the established Frankton industrial area and strategically located in relation to the Hamilton Southern Links corridor and North Island Main Trunk railway, making it well suited to industrial, employment and freight-generating activities. Overall, the proposals make efficient use of a strategically located land resource and coordinate development with existing and planned infrastructure, while providing substantial housing capacity and industrial land supply and supporting amenities. They are therefore consistent with Objective 2.2.12.
Policy 2.2.12a Development enables and encourages waste minimisation and efficient use of resources through design and construction methods.	The proposal is considered consistent with Policy 2.2.12a. The comprehensive masterplanning and design of Residential South and Industrial North proposals provides opportunities to minimise waste and use land, materials and infrastructure efficiently throughout construction and operation. The proposed earthworks and construction approach will enable suitable material excavated on the Site to be reused within the development where practicable, reducing the need to import or dispose of material off-site. The compact residential

	form also represents an efficient use of the land resource, while the integrated stormwater and blue-green network provides multiple functions including stormwater treatment and attenuation, ecological habitat, recreation and amenity. Construction activities will be managed through the relevant construction and earthworks management plans, including appropriate management of construction materials and waste. Overall, the proposal incorporates measures to support resource efficiency and waste minimisation through its design, earthworks and construction methodology, consistent with Policy 2.2.12a.
Policy 2.2.12b Buildings should be designed so they can be adapted in the future for a range of uses.	The proposal is considered generally consistent with Policy 2.2.12b, although the policy is of limited direct relevance given the level of building design detail available at this stage. The proposal will provide a range of residential and industrial typologies, together with a small neighbourhood commercial node, but detailed building designs will largely be determined through subsequent design and construction stages. The Residential Design Guidelines (refer to Residential South - Appendix 9) establish a framework for the future design of buildings but do not specifically require buildings to be capable of adaptation to different uses over time. Nevertheless, the comprehensive and flexible development framework does not preclude buildings being adapted as needs change. Accordingly, there is no identified aspect of the proposal that would conflict with Policy 2.2.12b, although the extent to which individual buildings can be adapted for different future uses will depend on their detailed design.
Policy 2.2.12c Development is designed to consider and adapt to the expected effects of climate change by: (i) Reducing embodied and operational carbon to minimise greenhouse gas emissions.	The proposal is considered generally consistent with Policy 2.2.12c. The development has been comprehensively designed to respond to future climate change conditions and to support a more resource and energy efficient urban form. In relation to carbon emissions, the compact residential form, connected walking and cycling network, provision for future public transport, and integration of residential development with local commercial and recreational opportunities will help reduce

(ii) Planning for development and resource use to withstand predicted extreme weather events.	reliance on private vehicle travel. The efficient use of land and infrastructure, together with the reuse of suitable material excavated on site where practicable, will also assist in reducing resource use and embodied carbon associated with development. Detailed building design is not yet available, and therefore the extent of operational and embodied carbon reductions at an individual building level cannot presently be quantified. The proposal has also been specifically designed to respond to predicted extreme weather events and future climate change conditions. The stormwater system has been designed to manage the 100-year event incorporating future climate change, with post-development peak discharges limited to no more than 80% of pre-development flows. The integrated system of rainwater tanks, soakage, constructed wetlands and safe overland flow paths will provide additional resilience to more intense rainfall. Geotechnical and groundwater investigations have also informed the development design, with appropriate engineering, monitoring and management measures proposed to address site conditions and associated natural hazard risks. Overall, the proposal incorporates both climate mitigation and adaptation measures, with particularly robust provision for resilience to future extreme rainfall and natural hazard conditions. It is therefore considered generally consistent with Policy 2.2.12c.
Policy 2.2.12d Development enables and encourages the efficient use of resources and recognises the benefits resulting from integrated land use planning.	The proposal is considered consistent with Policy 2.2.12d. The Residential South and Industrial North proposals represent comprehensively planned developments that integrate land use, transport, three waters infrastructure, open space and ecological outcomes to make efficient use of the Site and supporting infrastructure. The Residential South proposal will provide approximately 938 dwellings in a compact urban form, together with a neighbourhood commercial node, public open space and a connected walking and cycling network. The location and distribution of these activities will enable residents to access some everyday services and recreational opportunities locally, while the movement network provides connections to surrounding areas and makes provision for future public transport. Higher residential

	densities are generally focused around key amenities and movement routes, supporting efficient use of land and infrastructure. The five stage development and infrastructure strategy also coordinates the timing of development with the availability and delivery of transport and three waters infrastructure. The integrated blue-green network further demonstrates efficient resource use by combining stormwater treatment and attenuation with ecological enhancement, open space, amenity and connectivity functions. The Industrial North proposal will provide 22 serviced industrial lots over 41.4ha of net industrial land, enabling approximately 168,000m2 of future industrial and associated floorspace within the strategically identified SL1 Growth Cell adjoining the established Frankton industrial area. This represents a substantial addition to industrial capacity within greater Hamilton and responds directly to the identified long-term shortfall in industrial land supply detailed in the Economic Assessment (refer to Industrial North – Appendix 29). The lots provide a range of sizes and configurations capable of accommodating a broad spectrum of anticipated industrial activities, from smaller trade and service businesses through to larger warehousing, distribution and logistics activities. This will increase both the supply and choice of development ready industrial land. The Site is also contiguous with the established Frankton industrial area and strategically located in relation to the Hamilton Southern Links corridor and North Island Main Trunk railway, making it well suited to industrial, employment and freight-generating activities. Overall, the proposals demonstrate the benefits of integrating land use, infrastructure, transport and environmental planning, enabling efficient use of the land and physical resources while supporting a well-functioning urban environment. They are therefore considered consistent with Policy 2.2.12d.
Objective 2.2.13 Land use and development is integrated with the provision of infrastructure (including transport, three water services and open space)	The proposal is considered consistent with Objective 2.2.13. The proposal has been comprehensively masterplanned so that land use and development is closely

	integrated with the provision and staging of transport, three-waters infrastructure and open space. The development will be delivered across five principal stages, with infrastructure provided progressively to support each stage. Water supply and wastewater servicing will utilise available connections to the existing Hamilton networks in the earlier stages, transitioning to planned longer-term strategic infrastructure as development progresses. Stormwater is managed through an integrated on-site system incorporating rainwater tanks, soakage, constructed wetlands and overland flow paths. The transport network similarly integrates new arterial, collector and local roads with connections to the surrounding network, walking and cycling infrastructure, and provision for future public transport and the wider Southern Links network. Infrastructure is also integrated with the spatial arrangement of development. The Mangakōtukutuku Stream, stormwater facilities, ecological restoration areas and public open spaces form an interconnected blue-green network, while the neighbourhood park and commercial node are located within the residential catchment and connected by the movement network. Accordingly, the proposal demonstrates a coordinated approach to land use, infrastructure and open-space planning, with development staged to align with the infrastructure necessary to support it. The proposal is therefore consistent with Objective 2.2.13.
Policy 2.2.13a Development shall not compromise the safe, efficient, and effective operation and use of existing or planned infrastructure.	The proposal is considered consistent with Policy 2.2.13a. The Residential South and Industrial North proposals have been comprehensively planned and staged to ensure that development can be accommodated without compromising the safe, efficient and effective operation of existing or planned infrastructure. The Infrastructure Assessment (refer to **Residential South - Appendix 13 and Industrial North – Appendix 13**) establishes a staged servicing strategy for water supply, wastewater and stormwater. Earlier stages will utilise available capacity and

	connections to existing Hamilton infrastructure, with development transitioning to longer-term strategic servicing solutions as these become available. The five stage approach enables infrastructure requirements and capacity to be coordinated with the scale and timing of development, rather than relying on infrastructure before it is available. Stormwater will be managed primarily within the Site through the integrated treatment, attenuation and conveyance network. Similarly, the Integrated Transport Assessment and Construction Management Plan (refer to **Residential South - Appendix 16 and Industrial North – Appendix 16**) assess the effects of the development on the surrounding transport network and identify the upgrades required as development progresses. These include improvements to the Macmurdo, Forth, Saxbys and Ohaupo Road connections and intersections for Residential South, and Kahikatea Drive / Greenwood for Industrial North, with relevant upgrades tied to development staging and anticipated traffic demands. The internal network has also been designed to integrate with existing and planned connections, including the future Hamilton Southern Links network. Accordingly, the proposal incorporates staging, infrastructure upgrades and servicing requirements that align development with available and planned network capacity, ensuring that the safe, efficient and effective operation of existing and planned infrastructure is not compromised. The proposal is therefore consistent with Policy 2.2.13a.
Policy 2.2.13b Development allows for future infrastructure needs, including maintenance, upgrading and co-location where appropriate.	The proposal is considered consistent with Policy 2.2.13b. The Residential South and Industrial North proposals have been comprehensively planned to accommodate both the immediate infrastructure requirements of the development and the longer-term infrastructure needs of the wider SL1 Growth Cell and southern Hamilton growth area. The Infrastructure Assessment (refer to **Residential South - Appendix 13 and Industrial North – Appendix 13**) establishes a staged servicing approach that enables early stages to connect to available water supply and wastewater infrastructure,

	while providing for transition to longer term strategic solutions as the wider area develops. The layout also provides for the infrastructure corridors and facilities necessary to operate, maintain and upgrade these networks over time. Stormwater infrastructure is integrated within the wider blue-green network, enabling drainage, ecological, open-space and amenity functions to be co-located where appropriate. The transport network has similarly been designed with future needs in mind, including connections to surrounding land, provision for walking and cycling, future public transport and integration with the planned Hamilton Southern Links network. This approach avoids designing the Site solely around its immediate servicing requirements and provides flexibility for infrastructure to evolve alongside future growth. Accordingly, the proposal provides for future infrastructure requirements and facilitates the maintenance, upgrading and appropriate co-location of infrastructure, consistent with Policy 2.2.13b.
Policy 2.2.13c New development connects well with existing development and infrastructure.	The proposal is considered consistent with Policy 2.2.13c. The Residential South site is located immediately adjoining Hamilton's existing urban area and has been comprehensively masterplanned to provide strong connections with the surrounding transport, three waters and open space networks, while also facilitating connections to the future development of the wider SL1 Growth Cell. The transport network provides for connections to the existing network through Saxbys Road, Macmurdo Avenue and Forth Crescent, supported by associated intersection and network upgrades as development progresses. The internal street network incorporates walking and cycling connections and provides for future public transport, while also recognising and integrating with the planned Hamilton Southern Links network. The layout has been designed to enable connections to adjoining land so that Residential South does not develop as an isolated or internally focused urban area.

The Infrastructure Assessment (refer to **Residential South - Appendix 13**) similarly provides for integration with existing and planned water supply and wastewater networks, with servicing transitioning from available existing connections to longer-term strategic infrastructure as the wider southern growth area develops. The Site's stormwater and open space networks are also integrated through the Mangakōtukutuku Stream corridor, constructed wetlands, ecological restoration areas and other components of the blue-green network.

The Industrial North site is located immediately adjoining Hamilton's existing urban area and has been comprehensively masterplanned to provide strong connections with the surrounding transport, three waters and open space networks, whilst facilitating connections to the future development of the wider SL1 Growth Cell.

The Industrial North site will provide 22 serviced industrial lots over 41.4ha of net industrial land, enabling approximately 168,000m2 of future industrial and associated floorspace within the strategically identified SL1 Growth Cell adjoining the established Frankton industrial area. This represents a substantial addition to industrial capacity within greater Hamilton and responds directly to the identified long-term shortfall in industrial land supply detailed in the Economic Assessment (refer to **Industrial North – Appendix 29**). The lots provide a range of sizes and configurations capable of accommodating a broad spectrum of anticipated industrial activities, from smaller trade and service businesses through to larger warehousing, distribution and logistics activities. This will increase both the supply and choice of development ready industrial land. The Site is also contiguous with the established Frankton industrial area and strategically located in relation to the Hamilton Southern Links corridor and North Island Main Trunk railway, making it well suited to industrial, employment and freight-generating activities.

Accordingly, the Residential South and Industrial North developments will be well connected physically and functionally with existing development and infrastructure, while also enabling integration with future growth and strategic infrastructure, consistent with Policy 2.2.13c.

Policy 2.2.13d Development does not result in incompatible adjacent land uses with respect to existing or planned infrastructure.	The proposal is considered consistent with Policy 2.2.13d. The proposal has been comprehensively planned to ensure that the residential and neighbourhood scale commercial activities are compatible with existing and planned infrastructure and do not constrain its ongoing operation or future development. The masterplan and supporting technical assessments have been informed by the surrounding transport and three waters networks, including the planned Hamilton Southern Links infrastructure. The layout, access arrangements and staging of development have been designed to integrate with these networks and to maintain their safe and efficient operation. Where infrastructure upgrades are required to accommodate development, these are identified and coordinated with the relevant stages rather than relying on incompatible land uses being established in a manner that could constrain future infrastructure provision. Potential interface effects associated with infrastructure, including transport noise and other amenity effects, have also informed the design and management of the development, including appropriate setbacks and controls within the Industrial North proposal, including adjoining the Railway corridor and HSL designation. Appropriate separation, layout, landscaping and other mitigation measures can be applied where necessary to ensure that future residential activities do not create inappropriate reverse-sensitivity effects on existing or planned infrastructure. Accordingly, the proposal appropriately manages the relationship between new development and existing and planned infrastructure and is not expected to establish incompatible adjacent land uses or constrain the operation, maintenance or future development of infrastructure, consistent with Policy 2.2.13d.
Policy 2.2.13e Rail, cycle, pedestrian, public transport, micro-mobility, and motorised vehicle networks are well connected and integrated across and beyond the city.	The proposal is considered consistent with Policy 2.2.13e. Both the Residential South and Industrial North proposals have been designed around a connected and integrated movement network that provides for a range of transport modes and links the Site with the existing Hamilton urban area and the wider future transport network.

	The internal street hierarchy is supported by a comprehensive walking and cycling network, with connections through streets, open spaces and the blue-green network. External connections are provided through Saxbys Road, Macmurdo Avenue and Forth Crescent for Residential South and Greenwood Street / Kahikatea Drive for Industrial North, with associated upgrades enabling the development to integrate with the surrounding transport network. The layout also provides for future public transport routes, particularly along the collector network, and facilitates connections to adjoining land as the wider SL1 Growth Cell develops. Provision for walking, cycling and other forms of micro-mobility alongside the road network will provide residents with alternatives to private vehicle travel. The Integrated Transport Assessment (refer to **Residential South - Appendix 16 and Industrial North – Appendix 16**) also considers the relationship with the planned Hamilton Southern Links network and identifies the transport improvements required as development is progressively delivered. While the proposal does not itself provide rail infrastructure, the wider multimodal network has been planned so that development does not preclude integration with existing or future strategic transport infrastructure. Accordingly, the proposal establishes a well-connected multimodal transport network that integrates with existing development and provides for future connections beyond the Site, consistent with Policy 2.2.13e.
Policy 2.2.13f Development prioritises strong connections to, and use of, public transport and walking, cycling, and micro-mobility.	The proposal is considered consistent with Policy 2.2.13f. Both the Residential South and Industrial North proposals have been designed around a connected movement network that supports walking, cycling and micro-mobility as practical alternatives to private vehicle travel, while also providing for future public transport. The masterplan incorporates footpaths, shared paths and other active mode connections throughout the development, including links through the blue-green and open-space network and connections to the surrounding urban area via Saxbys Road, Macmurdo Avenue and Forth Crescent. The neighbourhood commercial node, park

	and other amenities are integrated within this network, enabling residents to access local destinations by walking, cycling and micro-mobility. The street hierarchy also provides for future public transport along the collector network, allowing services to be introduced as Residential South and the wider SL1 Growth Cell develop. The Integrated Transport Assessment (refer to **Residential South - Appendix 16**) supports this multimodal approach and identifies improvements to external walking and cycling connections as part of the staged transport response. While public transport provision will ultimately depend on the development of the wider network and service provision, the proposal establishes a land use pattern and movement network that will enable and support its future use. Accordingly, the proposal provides strong active-mode connections and enables future public transport integration, consistent with Policy 2.2.13f.
Objective 2.2.14 (i) A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. (ii) City urban form that enables people to satisfy most of their daily needs within a nominal 10-minutes walk from home and all other daily needs within a nominal 20 minute one-way cycle, micro-mobility, or bus ride.	The proposal is considered consistent with Objective 2.2.14. The proposal has been comprehensively masterplanned to establish a well-functioning urban environment, providing approximately 938 dwellings across a range of housing typologies, supported by local commercial activities, public open space, a connected movement network and integrated blue-green infrastructure. This will provide housing choice and access to recreation, services and transport opportunities, supporting the social, economic and cultural wellbeing, health and safety of future residents. The spatial arrangement of the development also supports the 10 minute and 20 minute accessibility principles in the Objective. A centrally located neighbourhood commercial node and approximately 3,200 m² neighbourhood park will place local services and recreation within convenient walking distance of much of the development. These destinations are connected by an extensive network of streets, footpaths, shared paths and connections through the open space and blue-green network. The compact residential form and higher densities around key amenities and movement routes further support walking, cycling and micro-mobility.

	For needs that cannot be met within the Site, the proposal provides connections to the established Hamilton urban area through Saxbys Road, Macmurdo Avenue and Forth Crescent, together with active-mode improvements and provision for future public transport along the collector network. While the precise 20 minute accessibility of all daily needs will depend in part on the future development of the wider SL1 Growth Cell and public transport services, the proposal establishes an urban form and movement network that supports this outcome and does not preclude its achievement. For the Industrial North proposal, the natural extension of the existing Frankton Industrial precinct and roading connections will ensure connectivity and wider urban functionality is achieved. Contributing industrial employment in close proximity to established residential areas supports a coordinated and cohesive approach to the City's growth, supports coordinated infrastructure delivery and aligns with a compact city. Overall, Residential South and Industrial North will establish a compact, connected and comprehensively planned urban environment that provides for the wellbeing of its future community and supports convenient access to daily needs by walking, cycling, micro-mobility and, over time, public transport. The Project is therefore considered consistent with Objective 2.2.14.
Policy 2.2.14a Provide for residential and mixed-use developments of unlimited height within the Central City Zone.	Policy 2.2.14a is not relevant to the proposal, as the Residential South and Industrial North sites are not located within the Central City Zone and does not propose unlimited building heights. Accordingly, the specific direction of this policy is not engaged.
Policy 2.2.14b Provide for high-density residential developments within a nominal 800m walking distance of the Central City Zone.	Policy 2.2.14b is not directly relevant to the proposal, as the Residential South site is not located within a nominal 800m walking distance of the Central City Zone. While the proposal provides a relatively compact, medium-density residential form, it is not the type or location of high density development specifically contemplated by this policy. Accordingly, the specific direction of Policy 2.2.14b is not engaged.

Policy 2.2.14c Provide for medium-density residential developments within a nominal 400m walking distance of the Sub-regional Centre at Chartwell and the Suburban Centres at Five Cross Roads, Clyde Street East, Hamilton East, Frankton, and Dinsdale.	Policy 2.2.14c is not directly relevant to the proposal, as the Residential South site is not located within a nominal 400m walking distance of any of the identified Sub-regional or Suburban Centres. While the proposal provides a predominantly medium-density residential form, it is not within the locations specifically targeted by this policy. Accordingly, the specific direction of Policy 2.2.14c is not engaged.
Policy 2.2.14d Provide for medium density residential development along Boundary Road, Peachgrove and Hukanui Road frequent public transport corridors and high and medium density residential development along the Te Rapa Road frequent public transport corridors.	Policy 2.2.14d is not directly relevant to the proposal, as the Residential South site is not located along any of the identified frequent public transport corridors on Boundary Road, Peachgrove Road, Hukanui Road or Te Rapa Road. While the proposal provides a predominantly medium-density residential form and makes provision for future public transport, it is not within the locations specifically targeted for intensification by this policy. Accordingly, the specific direction of Policy 2.2.14d is not engaged.
Policy 2.2.14e Require subdivision to create: (i) A connected, legible, and universally accessible transport network, and (ii) Neighbourhoods that: – Are permeable to, and prioritise, walking, cycling, micro-mobility and public transport, and – Enable local trips to be undertaken without a private vehicle.	The proposal is considered consistent with Policy 2.2.14e. The proposal has been comprehensively masterplanned to establish a connected, legible and accessible movement network that prioritises walking, cycling and micro-mobility alongside vehicle movement and provides for future public transport. The internal street hierarchy provides multiple connections through the development and to the surrounding network, supported by footpaths, shared paths and active-mode connections through the open space and blue-green network. Connections to Saxbys Road, Macmurdo Avenue and Forth Crescent, together with provision for future connections to adjoining land, ensure that the development is permeable rather than internally focused or reliant on a limited number of movement routes. The layout also provides for future public transport along the collector network. The neighbourhood commercial node, approximately 3,200 m² neighbourhood park, open spaces and recreational opportunities are integrated within the residential catchment and connected by the active-mode network. This enables a range of

	everyday local trips to be made by walking, cycling and micro-mobility rather than requiring use of a private vehicle. Accordingly, the subdivision establishes a connected, legible and permeable neighbourhood that supports and prioritises active and sustainable transport modes, consistent with Policy 2.2.14e.
Policy 2.2.14f Improve the permeability of neighbourhoods for, and give access priority to, pedestrians, cyclists, and micro-mobility users.	The proposal is considered consistent with Policy 2.2.14f. The Residential South development has been designed to provide a permeable and well-connected movement network that prioritises pedestrians, cyclists and micro-mobility users. The internal street network is complemented by footpaths, shared paths and connections through the open-space and blue-green network, providing multiple routes between residential areas, the neighbourhood commercial node, neighbourhood park and other open spaces. These routes also connect to the surrounding network through Saxbys Road, Macmurdo Avenue and Forth Crescent, with further connections enabled as the wider SL1 Growth Cell develops. The resulting network provides convenient alternatives to private vehicle travel and supports safe and direct movement through and beyond the Site for pedestrians, cyclists and micro-mobility users. The proposal is therefore consistent with Policy 2.2.14f.
Policy 2.2.14g Improve the amenity and safety of activity nodes and travel routes to them to make them safer and more attractive for pedestrians, cyclists, and micro-mobility users.	The proposal is considered consistent with Policy 2.2.14g. The Residential South proposal has been designed so that key activity nodes, particularly the neighbourhood commercial node, neighbourhood park and other public open spaces, are readily accessible through a safe, attractive and connected walking, cycling and micro-mobility network. The commercial node and approximately 3,200 m² neighbourhood park are centrally located and integrated with the surrounding residential development, street network and blue-green corridors. Footpaths, shared paths and connections through open spaces provide direct and convenient routes to these destinations, while the Urban

	Design Assessment (refer to **Residential South - Appendix 10**) and Residential Design Guidelines (refer to **Residential South - Appendix 9**) promote building orientation, passive surveillance, legibility and high-quality public interfaces that contribute to the safety and amenity of these routes and destinations. Accordingly, the proposal creates well-connected and attractive activity nodes and provides safe and convenient active-mode routes to them, consistent with Policy 2.2.14g.
Policy 2.2.14h Ensure there is sufficient development capacity in respect of business land to meet the expected demands of the city.	Policy 2.2.14h is of limited direct relevance to the proposal, as Residential South is predominantly a residential development and is not intended to provide a significant component of Hamilton's strategic business land capacity. However, the proposal includes a small neighbourhood commercial node intended to provide for local scale retail and service activities that meet some of the day to day needs of the future community. The proposal does not involve the loss or displacement of existing business land and will complement, rather than compete with, the wider hierarchy of business centres within Hamilton. Accordingly, while the proposal makes a modest contribution to local business capacity, the broader requirement to ensure sufficient business land capacity across the city is principally a strategic planning matter, and the proposal does not conflict with Policy 2.2.14h. For Industrial North, the proposal provides strategic industrial land, which is designed and intended for strategic industrial activities that support and agglomerate in proximity to the future HSL and existing Frankton industrial precinct. This approach is consistent with Policy 2.2.14h.
Policy 2.2.14i Support the renewal and revitalisation of business centres to make them more attractive to customers.	Policy 2.2.14i is of limited direct relevance to the proposal, as Residential South does not involve the renewal or revitalisation of an existing business centre. Rather, the proposal will establish a new, small scale neighbourhood commercial node to serve the day to day needs of the future residential community.

	The commercial node is integrated with the neighbourhood park, surrounding residential development and walking and cycling network, providing an accessible and attractive focal point for the new community. While this supports the broader intent of creating attractive and accessible business centres, the specific direction of Policy 2.2.14i relating to the renewal and revitalisation of existing centres is not directly engaged.

Objective / Policy	Comment
Notable Trees	
Objective 20.2.4 – Notable Trees The values of Notable Trees are protected and maintained.	The Project, and specifically SL1 Residential South, is considered broadly consistent with the Chapter 20, Natural Environment, where the transportation improvements are necessary to provide a safe and functional supporting upgrade for the Ohaupo Road corridor to benefit the E82 Designation and wider HCC network. Any notable tree effects will be addressed through replacement planting, arboricultural controls, documentation of the existing trees and reuse of salvaged timber where practicable. The supporting Appendix 16 ITA, has considered transportation improvements to facilitate the Project, whilst balancing the wider implications. The Project seeks the removal of two Notable Trees, T256 and T257, however, as outlined in the Planning Response Memo, alternatives have been considered, and any adverse effects of the two notable trees removal is considered acceptable, subject to the proposed mitigation and consent conditions, which include compensatory planting. The Project is considered broadly consistent with Objective 20.2.4 due to the circumstances in which the likely requirement for two notable trees to be removed and associated intersection upgrades to support the Residential South proposal. Whilst the removal of T256 and T257, two notable trees, is proposed as part of the wider mitigation to facilitate transportation upgrades, removal will only occur once the Ohaupo Road / Resthill Crescent intersection upgrade is required (before development exceeds 543 dwellings), and only if the certified detailed design confirms, and a suitably qualified arborist certifies, that the works cannot be undertaken while retaining the trees in a safe and viable condition (refer to the proposed conditions in Section 2.1 of the Planning Response Memorandum). Consent for the removal of these trees is sought as part of this Application. No other scheduled notable trees are affected by the works shown in the Appendix 16 concept plans.

It is acknowledged that Hamilton has a distinctive character derived from its trees, and this forms part of the amenity and identity of Hamilton. Individual notable trees form a part of this wider character and amenity. Notwithstanding that both T256 and T257 are scheduled in the HCC ODP, both are within the E82 Designation of Ohaupo Road, which is administered by the New Zealand Transport Agency.

The strategic intent of scheduling notable trees within the E82 designation corridor seems contrary to the intent and purpose, however, both are notable trees and are assessed as such. No clear future projects are known within Ohaupo Road (E82 Designation) corridor, with NZTA and HCC both considering wider funding and implementation of Hamilton Southern Links, wider funding and implementation of Metro Spatial Plan, and in particular bus rapid transit corridors, and wider implementation. Notwithstanding that no clear projects are understood; the purpose and intent of the E82 Designation is clear. As part of likely further implementation of the E82 designation, for roading and associated transport infrastructure, it is anticipated that T256 and T257 would be removed at some stage in the future. This view is based on practical interpretation of the corridor and the likely form and function of the current State Highway and transition to a key urban connector medium – long term. The locational attribute of a tree should be considered an important contextual component in the scheduling process, whereby the wider intent of E82 and the designation was known. The Residential South Masterplan proposes significant ecological enhancement, riparian corridor planting, landscaping and neighbourhood reserves, all of which will include specimen trees. Over time these trees will mature and form part of the wider amenity and character and positively and meaningfully contribute to the established character that Hamilton exhibits regarding trees.

Any residual loss associated with the T256 and T257 notable trees is factored into the detailed planting strategy outlined in the Residential South masterplan,

	including the riparian corridors, reserve planting, street planting and meaningful contribution to tree canopy outcomes as part of detailed planting implementation. Further replacement planting can be considered if required. In addition, replacement planting is proposed at a minimum ratio of 2:1, comprising no fewer than four large-canopy trees, with species and locations to be approved by Council (refer to Section 2.1 of the Planning Response Memorandum). Overall, the removal of T256 and T257 is considered broadly consistent with the notable tree provisions of Chapter 20, where the transportation improvements are necessary to provide a safe and functional supporting upgrade for the Ohaupo Road corridor to benefit the E82 Designation and wider HCC network. Any notable tree effects will be addressed through replacement planting, arboricultural controls, documentation of the existing trees and reuse of salvaged timber where practicable. On that basis, the removal of T256 and T257 is broadly consistent with the notable tree provisions of Chapter 20 of the HCC ODP, and any adverse effects are considered acceptable given the alternatives considered, subject to the proposed mitigation and consent conditions.
Policy 20.2.4a The particular factors, values and features of trees listed in Schedule 9D shall be protected from inappropriate subdivision, use and development, by assessing: i. The extent that any proposed maintenance will adversely affect the health of the tree ii. The character of the area in which the tree is located, including streetscape and public realm areas. iii. The potential adverse effects on the health of the tree. iv. The nature and extent of any proposed activities to be undertaken within the Protected Root Zone of the tree.	The Residential South proposed development is not directly aligned with this policy, as approval is sought for the removal of two notable trees. Regarding 'i', the proposed works would adversely affect the tree and result in the loss of the tree. Regarding 'ii', the character of the area is intertwined with the E82 NZTA Designation, and the Ohaupo Road corridor, and the wider tree planting which adjoins the shared path adjacent to existing residential. The trees form a distinctive character of the particular street context, and this is evident in part by the notable tree scheduling for T256 and T257. Individually, each tree is considered mature, a good healthy specimen and contributing positively to the wider character of the street scene and public realm. The proposed works would adversely affect the tree and result in the loss of the tree.

	Regarding 'iii', the health affects on the two notable trees would be determinative and would resulting in the loss of the trees. Regarding 'iv', the nature and extent of works within the root protection zone, and within the trunk location make it likely that the two notable trees would be lost. More broadly, the proposal would remove these two notable trees from the wider streetscape, whilst acknowledging that the existing trees adjoining Ohaupo Road are all located within the E82 designation. Contextually, the E82 designation has a roading and transportation purpose. Notwithstanding this, landscaping, and specifically trees, provides an important visual break between Ohaupo Road and the residential area to the north of Ohaupo Road. As part of any notable tree removal, and wider tree removal, and in association with wider outcomes within the E82 designation, the opportunity for further specimen tree planting should be determined and is captured in the proposed conditions of consent.
Policy 20.2.4b Within areas of greenfield development the values of significant trees shall be maintained and taken into account in the layout and design of new development.	The proposed Residential South master plan site has no notable scheduled trees, and seeks to establish via riparian corridor planting, reserve planting, street tree planting a meaningful tree canopy and amenity as the development matures. Therefore, this policy is not relevant to the proposal. The wider implementation of offsite transportation improvements to facilitate the Residential South Project, and the consideration of alternatives, demonstrates the broader consideration of notable trees in the overall Project.
Policy 20.2.4c Removal or transplantation of Notable Trees within established urban areas shall be avoided expect where: i. Alternative options for the retention of the tree have been exhausted.	The development is broadly aligned with Policy 20.2.4c. Whilst the removal of T256 and T257, two scheduled notable trees, is proposed as part of the wider mitigation to facilitate transportation upgrades, this will only occur at a later stage of the development, and will only occur if required as part of detailed design drawings implementing the transportation requirements, which will go through a standard

ii.	The extent to which the removal, re-location, or trimming can be mitigated by replacing planting.	certification process. Alternative options have been considered as part of transportation improvements, as outlined in the Planning Response Memo and Appendix 16 ITA – Residential South, where retention of one tree, reduced construction footprint, root-sensitive construction have all been considered, scenarios with and without HSL have been considered. The proposed conditions are also worded to ensure flexibility should both T256 and T257 not requirement removal once final detailed design and certification have occurred. The extent of alternatives considered is complemented by the purpose and intent of the E82 designation corridor which does not fully align with the notable tree scheduling long-term, particularly when considering broader strategic intent of Metro Spatial Plan and North Waipa – South Hamilton Spatial Study. While Replacement planting adjoining or adjacent to Ohaupo Road is to be considered as part of proposed conditions, where a tree planting programme plan is proposed for certification prior to T256 and T257 removal, which determines the offset ratio, location, species and size to suppory healthy establishment. This will also include a locational consideration of where the replanting is best placed, long-term. Any residual loss associated with the T256 and T257 notable trees is factored into the detailed planting strategy outlined in the Residential South master plan, including the riparian corridors, reserve planting, street planting and meaningful contribution to tree canopy outcomes as part of detailed planting implementation. In addition a replacement planting programme is proposed as a condition of consent, see Planning Response Memo, with the planting plan to be prepared through the detailed design and engineering approval process. This includes the location of any offset planting to be determined with Hamilton City Council. Subject to those measures, the residual landscape and visual effects are expected to be managed in the context of the road corridor and underlying transport zoning. Overall, for the reasons above, the Residential South Project is considered

	consistent with Policy 20.2.4c.
Policy 20.2.4d Any work on a notable tree, or work within the Protected Root Zone of any notable tree shall not adversely affect the values of the tree, having regard to the reasons for the tree's scheduling.	The proposal is considered contrary to this policy, whereby the removal of the two notable trees will directly affect the reasons for the trees' scheduling.
Policy 20.2.4e Ongoing care and maintenance of Notable Trees to ensure the ongoing health, wellbeing and longevity of the notable tree is protected.	The proposal is considered contrary to this policy, whereby the removal of the two notable trees will directly affect the reasons for the trees' scheduling.

Conclusion

Overall, the removal of T256 and T257 is considered broadly consistent with the notable tree provisions of Chapter 20, where the transportation improvements are necessary to provide a safe and functional supporting upgrade for the Ohaupo Road corridor to benefit the E82 Designation and wider HCC network. Any notable tree effects will be addressed through replacement planting, arboricultural controls, documentation of the existing trees and reuse of salvaged timber where practicable. Specifically, Policy 20.2.4c provides a pathway for the removal of notable trees where alternatives have been exhausted and the extent of the removal can be offset by replacement planting or mitigation. As outlined above, on balance the Residential South Project is considered to be consistent with this policy, where alternatives have been considered and assessed, appropriate conditions will further determine the exact footprint of the proposed works as part of detailed design, and the ability to implement a planting programme to manage any residual effects is included. On that basis, the removal of T256 and T257 is broadly consistent with the notable tree provisions of Chapter 20 of the HCC ODP, and any adverse effects are considered acceptable given the alternatives considered, subject to the proposed mitigation and consent conditions.

Context:
The following assessment addresses the relevant Chapter 25.14 –Transportation provisions associated with the proposed road connections, wider transportation considerations for Residential South and Industrial North.

Objective / Policy	Comment
Transportation	
Objective 25.14.2.1 – Integrated Transport Network An integrated, multi-modal, climate-resilient transport network with low embodied and operational greenhouse gas emissions that meets national, regional, and local transport needs, gives effect to Te Ture Whaimana, provides travel choices, supports high quality growth and development of the economy and an enjoyable, liveable city, and is: (i) Efficient, to the extent consistent with Policy 25.14.2.1g. (ii) Affordable. (iii) Safe and where no one is killed or seriously injured. (iv) Accessible to all. (v) Sustainable. (vi) Integrated with land use to minimise the need to travel and the total distance travelled, and avoid wherever practicable conflicts between transport modes. (vii) Easy to use and provides opportunities for play.	The development is consistent with Objective 25.14.2.1. The Residential South and Industrial North transport networks have been comprehensively planned as an integrated, multi-modal extension of Hamilton's southern urban transport network. The Integrated Transport Assessment (ITA) (and supporting appendices, refer to **Appendix 16 – Residential South and Appendix 16 Industrial North**) assesses the proposal across walking, cycling, public transport, freight and general traffic, as well as the integration of land use and transport and opportunities to improve accessibility and travel choice. The objective itself seeks an integrated, multi-modal and climate resilient network that provides travel choice and supports high-quality growth, while being efficient, affordable, safe, accessible and sustainable. The development achieves these outcomes for the following reasons: • Integrated and multi-modal network: The internal transport network for both Residential South and Industrial North include a hierarchy of collector and local roads, footpaths on all roads, dedicated cycleways on collector roads, recreational and shared paths, and roads designed to accommodate future public transport. These facilities connect to Saxbys Road, Forth Crescent and Macmurdo Avenue for Residential South and Kahikatea Drive / Greenwood Street for Industrial North and integrate with the adjoining Hamilton network. The ITA specifically identifies that the internal road, pedestrian and cycle networks have been designed to provide continuity with adjoining residential areas in Glenview / Deanwell and Frankton Industrial area, rather than operate as an isolated transport system. The proposed internal collector and future

arterial corridors have been designed to accommodate public transport, and the walking and cycling network connects the development with surrounding neighbourhoods, schools, existing public transport stops, open spaces and local destinations.

- Travel choice and sustainable transport: Walking and cycling are embedded throughout the development through footpaths, shared paths, separated cycleways, pedestrian accessways and connections through the blue green network. These routes improve permeability and shorten walking and cycling distances. The development also provides for future bus routes and stops, with connections to existing commuter bus stops and the wider walking and cycling network. Extensive shared path improvements on surrounding residential streets seek to integrate the proposal with the existing residential catchments and off / on road facilities. This supports modal shift and behavioural change as part of the Residential South development.

- Integration of land use and transport: The transport network has been developed alongside the masterplan and responds to the distribution of housing, the commercial node, neighbourhood park and other destinations. This integration, together with the provision of local commercial and recreational destinations, helps shorten daily trips and provides opportunities for those trips to be made by walking, cycling or other non-car modes. The same philosophy has underpinned the Industrial North layout and connections, with a strategic east/west collector road future proofing the south Hamilton / North Waipa industrial connectivity. Importantly, the transport strategy does not assume that Hamilton Southern Links will be delivered by a fixed date. The ITA (refer to Residential South – Appendix 16 and Industrial North – Appendix 16) assesses interim and future network scenarios and identifies targeted intersection upgrades, walking and cycling improvements, public-transport integration and staging controls. The internal network provides for future public transport routing and connections to existing surrounding

neighbourhoods.

- Development beyond identified thresholds is subject to additional transport assessment so that network safety and efficiency are maintained. The road pattern has been designed for both immediate connectivity and future integration. Macmurdo Avenue and Forth Crescent are extended into the Site, while the collector road and supporting local-street network provide a legible framework capable of connecting with later SL1 development. The network also accommodates future public transport, including indicative bus routing through the collector road, and provides walking and cycling connections to Saxbys Road, Resthills Park and surrounding neighbourhoods.
- Efficient and capable of supporting growth: The ITA concludes that, subject to the proposed mitigations and conditions, residual effects on network capacity and efficiency will be acceptable. This includes significant mitigation for a roundabout at Kahikatea Drive / Greenwood Street to facilitate the Industrial North development, and significant improvements within the Ohaupo Road corridor in a staged manner attached to incremental growth of the Residential South development.
- The transport strategy has specifically been developed in recognition that the timing of major strategic infrastructure, most notably Hamilton Southern Links (HSL), remains uncertain. The ITA (refer to Residential South – Appendix 16 and Industrial North – Appendix 16) records that although HSL is an important long-term component of the southern Hamilton transport network, its progression remains subject to future funding and delivery decisions. SL1 Residential South is therefore not premised on HSL being completed within a fixed timeframe. This is clearly presented in the Appendix 16 ITA – Residential South and Industrial North, and the circa 11 Waikato Regional Transport Model (WRTM) modelling

	scenarios presented to Road Controlling Authorities (RCAs) and included in the wider network modelling prepared by BBO. • Instead, the proposal adopts a staged transport response under which infrastructure is progressively delivered as development occurs. The ITA identifies specific improvements to the Ohaupo Road corridor and surrounding intersections and ties these to residential development stages. These include widening the southbound dual lanes between Saxbys Road and Lambert Court, four-laning Ohaupo Road between Saxbys Road and Lambert Court, additional lanes on the Saxbys Road and Tomin Road approaches, morning-peak metering and the Lambert Court intersection upgrade and wider Resthills Crescent improvements. • This staged approach allows the development to proceed on the basis of infrastructure that can reasonably be delivered by or in conjunction with the development, while retaining the ability to integrate with future strategic investment. It also avoids making occupation of the development dependent upon infrastructure whose funding and delivery timeframe sits outside the Applicant's control. Later development is subject to transport reassessment to confirm that the assumptions underpinning the ITA remain representative and to determine whether further mitigation or staging controls are required.

Objective / Policy	Comment
	• Safe and accessible: The transport assessment has expressly considered safety, including the existing crash environment in the wider network. Recommended conditions include appropriate interventions, mitigations, physical works and appropriate audits. Streets and active mode routes are also designed to promote personal security through footpaths, lighting, clear sightlines, active frontages and passive surveillance. • Accessible and easy to use: Both the Residential South and Industrial North transport hierarchy and differentiated street cross sections provide a legible network, with the central collector forming a clear principal route through both the Industrial North and Residential South developments. Dedicated walking and cycling facilities provide alternatives to the vehicle network and connect residential areas with the neighbourhood centre, parks and surrounding neighbourhoods. Improvements in the wider transport network, including shared paths, intersection interventions that are phased and staged, will integrate the Residential South development, and facilitate the positive uptake of active modes and promote behavioural change and wider mode shift. Climate resilience and lower-emission travel: The development supports reduced operational transport emissions by providing genuine alternatives to private vehicle travel, including comprehensive walking and cycling infrastructure, and integration with existing public transport services on Ohaupo Road and future more frequent services that may follow. The ITA identifies the active mode and public transport effects of the development as positive and recommends that this infrastructure be progressively delivered alongside development stages. The Infrastructure Report (refer to Appendix 13 Residential South and Industrial North) also identifies the transport network as part of a wider risk managed and integrated infrastructure framework for the development. • Amenity and opportunities for recreation: The movement network is not limited

to transport efficiency. Walking and cycling connections extend through public reserve areas and into Resthills Park, providing recreational as well as transport functions. Street landscaping, active frontages and the integration of movement routes with the neighbourhood centre, riparian corridor, stormwater reserves parks and blue green network will also contribute to an attractive and enjoyable public realm.

- Te Ture Whaimana: The Residential South and Industrial North sites are located relatively proximate to the Waikato River, whereby the Mangakotukutuku Stream and upper tributary for Residential South, and Waitawhiriwhiri Stream and upper tributary for Industrial North are within the existing site and downstream environment, and are both considered within the wider Waikato River catchment. More broadly, the transport network forms part of the integrated design and infrastructure response for the development, including the proposed stormwater management system and ecological and blue-green network. Stormwater generated from roads and other impervious surfaces will be appropriately collected and treated before being discharged back into the receiving catchment, while the wider development provides for the retention, enhancement and restoration of wetland and ecological areas and their integration within an interconnected blue green network where relevant. These measures will assist in managing the quality and quantity of water leaving the Site and contribute to improved ecological and freshwater outcomes, particularly for the Residential South site which includes the upper tributary of the Mangakotukutuku Stream.

Objective / Policy	Comment
	• Accordingly, the integrated design and management measures incorporated into the wider Residential South and Industrial North developments demonstrate that the proposal is consistent with Te Ture Whaimana and its overarching direction to protect and restore the health and wellbeing of the Waikato River and its catchment. Overall, Residential South and Industrial North will establish a connected, multi-modal transport network that integrates directly with Hamilton's existing and planned transport system and supports the urbanisation of the Site. The combination of a clear road hierarchy, comprehensive walking and cycling facilities, provision for future public transport, staged access improvements, and integration between transport and land use provides for an efficient, safe, accessible and sustainable transport environment with meaningful travel choice. The Southern Links 1 Application, and wider SL1 Growth Cell demonstrates the coordinated approach to transportation connectivity and strategic solutions, including acknowledging the Hamilton Southern Links designation and future role HSL will likely play in the south Hamilton / North Waipa environment. The proposal is therefore consistent with Objective 25.14.2.1.

Objective / Policy	Comment
Policy 25.14.2.1a – Land Use Integration Integrate land use and the transport network by: (i) Implementing Policies 2.2.14a to 2.2.14i. (ii) Managing vehicle access in accordance with Policy25.14.2.1o. (iii) Recognising and providing for planned upgrades of transport corridors.	The development is consistent with Policy 25.14.2.1a. The Residential South and Industrial North masterplans and transport networks have been developed in an integrated manner, with the location and intensity of land uses, internal movement hierarchy, external connections and staging of development coordinated to provide a connected urban extension to south Hamilton. This is consistent with the purpose of the HCC ODP transportation provisions and the specific direction in Policy 25.14.2.1a to integrate land use and transport through the urban form policies, management of vehicle access, and recognition of planned transport-corridor upgrades. The Project achieves this for the following reasons: • Integration with the urban-form outcomes in Policies 2.2.14a–i: As assessed above, the proposal provides a comprehensively planned residential neighbourhood incorporating a range of housing typologies and densities, a neighbourhood commercial node, public open space and a connected multi-modal movement network. The internal transport network for both Residential South and Industrial North include a hierarchy of collector and local roads, footpaths on all roads, dedicated cycleways on collector roads, recreational and shared paths, and roads designed to accommodate future public transport. These facilities connect to Saxby Road, Forth Crescent and Macmurdo Avenue for Residential South and Kahikatea Drive / Greenwood Street for Industrial North and integrate with the adjoining Hamilton network. The ITA specifically identifies that the internal road, pedestrian and cycle networks have been designed to provide continuity with adjoining residential areas in Glenview / Deanwell and Frankton Industrial area, rather than operate as an isolated transport system. The proposed internal collector and future arterial corridors have been designed to accommodate public transport, and the walking and cycling network connects the development with surrounding

neighbourhoods, schools, existing public transport stops, open spaces and local destinations. This supports the relevant outcomes in Policies 2.2.14a–i, particularly those relating to well-functioning neighbourhoods, accessibility, permeability, active modes and integration with surrounding development.

- Vehicle access is appropriately managed: Four external access points are proposed for Residential South, with their function and scale tailored to the development they serve. Forth Crescent and Macmurdo Avenue serve the primary connections for initial Stage 1 of the Residential South development, with Saxbys Road forming the key third connection for Stage 2, including a separate pedestrian / cycle connection to Saxbys Road. The provision for a future transport connection south and north, via the Arterial Road, reflects the wider holistic approach to transportation outcomes within Residential South and the wider SL1 Growth Cell.
- Industrial North is served by the Kahikatea Drive / Greenwood Street roundabout as the primary relationship to the site, fully acknowledging the Hamilton Southern Links designation, existing constraints within the network and the importance of achieving a balanced and future-proofed transportation outcome. An East/West industrial collector will future proof connections through the adjoining Rogerson Block to deliver on a strategic industrial collector from Tuhikaramea Road through to the future Hamilton Southern Links Road of National Significance.
- Both the Residential South and Industrial North developments have incorporated appropriate development triggers to deliver on a staged, phased development occurring and allowing for the incorporation of transportation improvements into the wider network as required.
- Land use staging is coordinated with transport infrastructure: The ITA concludes that the wider transport network can accommodate the development provided that development occurs in step with delivery of the external access network. The assessment is expressly based on delivery of the strategic interventions outlined in the Appendix 16 ITA which have been built into the draft condition sets. This ensures that transport infrastructure is available at the point it is

	required to support successive stages of urban development. • Future transport upgrades are not precluded: The ITA, specifically for the Residential South development incorporates a pause, whereby development beyond 543 dwellings requires further evaluation. This aligns with a conservative approach of development incrementally being added to the wider network and a holistic appreciation of how best to respond and manage any potential effects as development and the wider south Hamilton area matures. • Long term integration with Hamilton's transport network is embedded in the design: HCC transport standards have been used as the principal technical benchmark so that the internal road hierarchy, corridor widths, pedestrian and cycling provision, public transport capability, access design and intersection treatments are compatible with adjoining Hamilton infrastructure. The ITA notes that this approach avoids an artificial change in engineering standard at the territorial boundary and allows the network to integrate with Hamilton's wider urban transport system over the longer term. The Residential South and Industrial North proposals, and the staged approach to development and upgrades alongside the delivery of necessary transport infrastructure, demonstrate that the proposal is consistent with Policy 25.14.2.1a.

Objective / Policy	Comment
Policy 25.14.2.1b – Climate Change Promote the protection of existing street trees and the establishment and maintenance of a continuous tree canopy along transport corridors to: (i) Improve amenity for corridor users and adjoining land use; (ii) Minimise the urban heat island effects of urban intensification; (iii) Enhance biodiversity and ecological function; (iv) Provide summer shade to make the corridors more comfortable for walking, cycling, and micro-mobility during hotter weather; and (v) Store carbon.	The development is generally consistent with Policy 25.14.2.1b. Residential South and Industrial North are greenfield developments associated with the wider SL1 Growth Cell, and the principal relevance of the policy is therefore the establishment of new street trees and landscape planting along the proposed transport corridors, rather than the protection of an established urban street tree network. The landscape and urban design framework provides for street tree planting throughout the development, with different signature species proposed for different areas. The landscape strategy also carries elements of the street tree palette into private lot planting, helping to create a coordinated relationship between planting within the road reserve and adjoining residential frontages. The transport corridor design also provides physical space for this landscape treatment. The collector roads include dedicated parking or landscaping areas alongside footpaths and separated cycle facilities, while local streets similarly include areas for parking and/or landscaping. This enables street planting to be incorporated alongside walking and cycling infrastructure rather than treated as an afterthought. The proposed planting will contribute to a number of the outcomes sought by the policy, including: • improving corridor amenity, by providing street trees and landscape treatment alongside roads, footpaths and cycle facilities; • supporting biodiversity and ecological function, particularly when considered as part of the wider landscape and blue green network, which includes ecological restoration, wetlands, watercourses and associated planting; and • improving the comfort and attractiveness of active mode routes over time, as street trees mature and provide vegetation and shade alongside pedestrian and cycling routes.

Objective / Policy	Comment
	• The Urban Design Assessment also notes that the combination of street tree planting and front yard landscaping will ensure that the streetscape is not dominated by buildings, garages, driveways and hard surfaces. As outlined above, two notable trees are proposed to be removed, which is associated with necessary transportation mitigation to support the Residential South development, and additional existing street trees will also require removal to facilitate the proposed improvements, and roading connections. The removal of Council-owned street trees is addressed in Section 2.1 of the Planning Response Memorandum, including replacement at a minimum ratio of two new trees for each Council tree removed, consistent with Council's Tree Policy. Notwithstanding the removal of some existing trees and their canopies, the comprehensive Residential South master plan and Industrial North master plan incorporate a deliberate approach to introduce street trees and planting throughout to integrate with the existing Hamilton urban setting, which has an established tree network. The proposal is therefore generally consistent with Policy 25.14.2.1b.
Policy 25.14.2.1c – Climate Change Reduce embodied greenhouse gas emissions and operational greenhouse gas emissions.	The development is generally consistent with Policy 25.14.2.1c, particularly in relation to reducing operational transport emissions. The Residential South transport strategy in particular provides a range of measures intended to reduce reliance on private vehicle travel and support lower emission transport choices, including a comprehensive walking and cycling network, provision for future bus services, improvement to existing street networks to better integrate the development and wider transportation improvements on Ohaupo Road to facilitate and promote bus priority. In addition the Industrial North development integrates with existing shared paths,

pedestrian connections and future proofs shared paths within the E/W collector road layout.

The ITA (refer to Residential South - Appendix 16 and Industrial North – Appendix 16) identify positive effects for active modes and public transport, including footpaths on all streets, a connected cycleway and shared path network, upgraded connections to established neighbourhoods, roads designed to accommodate future bus services and a neighbourhood commercial node to shorten or remove incidental trips.

The land use pattern further assists in reducing operational emissions by integrating housing with a neighbourhood commercial node, parks and active mode connections, thereby enabling some daily trips to be made locally rather than by private vehicle.

While a specific embodied carbon assessment has not been undertaken for the transport infrastructure, the proposal incorporates a number of measures that will assist in limiting both embodied and operational transport emissions. The transport network has been designed to integrate with existing surrounding roads and infrastructure, and planned infrastructure within Hamilton Southern Links. The Industrial North strategic connection to Kahikatea Drive / Greenwood Street acknowledges this important opportunity and benefit in right sizing this transport outcome.

The development also provides for a connected and multi-modal transport network that supports walking, cycling and future public transport provision. The internal street network and connections to the surrounding transport network will provide opportunities for residents to access alternative modes of travel and reduce reliance on private vehicles over time. The ability to accommodate public transport as the wider south Hamilton and north Waipa growth area develops, particularly for the Ohaupo Road corridor and opportunities for investment in more frequent bus services is particularly important in supporting a longer-term shift towards lower-emission travel. Together, these measures provide a practical means of reducing unnecessary construction and associated embodied emissions, while establishing a

	transport network that can support lower operational carbon emissions over the life of the development. Overall, the Residential South and Industrial North developments support the reduction of operational transport emissions through a land use and transport framework that enables walking, cycling, micro-mobility and public transport. While embodied emissions have not been separately quantified, the integration with existing infrastructure, staged delivery of transport works, avoidance of unnecessary wider network upgrades and future proofing of key infrastructure to avoid reconstruction all assist in limiting embodied emissions. The proposal is therefore considered generally consistent with Policy 25.14.2.1c.

Objective / Policy	Comment
Policy 25.14.2.1d – Climate Change Plan the transport network to be resilient to predicted future extreme weather events.	The development is generally consistent with Policy 25.14.2.1d. The Residential South and Industrial North transport networks have been planned as part of the wider landform, stormwater and infrastructure response for the Site, with particular consideration given to the management of significant rainfall and flooding events. A key feature of the proposal is that the road network forms part of the stormwater management system. The Infrastructure Report (refer to Appendix 13) confirms that the stormwater network is designed to convey rainfall events up to the 10 year climate change adjusted event through the piped network, while larger flows up to the 100 year event are conveyed as overland flows within road corridors and directed toward the proposed stormwater ponds. The design also seeks to retain existing flow paths and discharge locations and account for external and upstream catchments so that downstream effects are not worsened. The resilience of this system has also been tested through flood modelling. A sensitivity scenario assuming blockage of all primary stormwater devices was assessed, with the modelling demonstrating that flood immunity is generally maintained. This provides an additional level of resilience in circumstances where primary drainage infrastructure may not operate as intended during an extreme event. The transport network also provides multiple connections to the surrounding network, including Forth Crescent, Macmurdo Avenue, Saxbys Road for Residential South, Kahikatea Drive / Greenwood Street, Wickham Street for Industrial North, with the principal internal collector system for both sites ultimately linking up with the wider SL1 Growth Cell and strategic transport connections. This connected network provides greater resilience than a development reliant on a single access point and supports the ability of the neighbourhood to remain connected to the wider transport system. More broadly, the ITA (refer to Appendix 16 – Residential South and Appendix

	16 – Industrial North) identifies resilience as an outcome of the relevant national and regional transport policy framework and concludes that the Residential South and Industrial North master plans and networks, including their connected road networks and multi-modal infrastructure, are consistent with those directions. Overall, the proposal provides a transport network that is integrated with a stormwater system designed to manage significant rainfall and overland flow events, including a tested failure scenario, while the connected road layout provides multiple routes into and out of the development. These measures provide an appropriate level of resilience to future extreme weather events and are consistent with Policy 25.14.2.1d.

Objective / Policy	Comment
Policy 25.14.2.1e – Accommodating Growth (i) Take account of the whole of life benefits and costs of the transport network. (ii) Minimise the building of new, or widening of existing, transport corridors to accommodate growth by: (a) Making the best use of existing transport corridors by reconfiguring them for more space-efficient modes of transport like walking, cycling, micro-mobility, and public transport rather than adding more lanes for private vehicles; and (b) Locating land uses and densities in such a way as to support walking, cycling, micro-mobility and public transport. (i) Enable transport corridors to be widened to accommodate stormwater treatment, street trees, or dedicated facilities for public transport, walking, cycling, or micro-mobility.	The development is generally consistent with Policy 25.14.2.1e. The Residential South and Industrial North proposals are both greenfield urban developments and therefore require a new internal transport network. However, the network has been comprehensively planned to accommodate the proposed growth in a manner that makes use of the surrounding transport network, provides substantial capacity for walking, cycling and future public transport, and avoids unnecessary widening or capacity upgrades to the wider road network. The transport network is also responding to the wider SL1 Growth Cell and south Hamilton / north Waipa environment. In relation to the specific components of the policy: • Whole of life benefits and costs: The transport network has been designed and staged having regard to its long term function rather than simply the immediate requirements of the initial development stages. Infrastructure and external connections are progressively delivered as development occurs. • While the ITA does not provide a quantified whole-of-life cost-benefit assessment, the ITA has considered the appropriateness of any proposed mitigation in the context of the network's long-term operation, adaptability and infrastructure requirements. • Making efficient use of the existing transport network: The proposal connects directly with the existing network through Forth Crescent, Macmurdo Avenue, Saxbys Road for Residential South, whilst enabling connectivity for the wider SL1 Growth Cell adjoining Residential South, whereas for Industrial North the connection to Kahikatea Drive / Greenwood Street as the primary, with Wickham Street as connectivity resilience, and the inclusion of an east-west collector to the adjoining Rogerson Block Master Plan, demonstrates an integrated approach to transport solutions. The Hamilton Southern Links designation which bisects

the Industrial North site is also incorporated into the proposed development and staging. In addition, localised improvements to existing streets are proposed to improve active mode and public transport provisions, particularly associated with the Residential South and wider immediate destinations, like employment, schools, community activities.

- Prioritising space efficient modes: Within the new development, road corridors are designed from the outset to accommodate a range of transport modes rather than maximising capacity for private vehicles. Collector roads incorporate footpaths, separated cycle facilities, landscaping and provision for future buses and bus stops. A comprehensive walking and cycling network also connects to surrounding neighbourhoods and existing bus connections.
- Providing sufficient corridor width for non-vehicle functions: The proposed road hierarchy specifically provides additional corridor space where required for active modes, public transport and landscaping. Collector roads are wider than local streets because of their broader movement and place functions, incorporating cycleways, footpaths, landscaping areas and provision for buses. By contrast, lower order local roads generally use narrower 16.8 m corridors appropriate to their local-access function. This demonstrates that wider transport corridors are being used selectively to accommodate functions such as public transport, walking, cycling and landscaping rather than simply to provide additional vehicle capacity.
- Street trees and landscape integration: Landscaping is incorporated within the road cross sections and street tree planting is proposed throughout the development. This supports the policy's recognition that corridor width may appropriately accommodate street trees and other non-vehicle functions.
- Overall, while the greenfield nature of Residential South and Industrial North means that construction of a new internal transport network is unavoidable, the proposal does not rely on widespread widening of the existing transport network to accommodate growth. Instead, it provides a fit for purpose road hierarchy,

	makes use of existing external corridors, concentrates higher intensity land uses around accessible locations, incorporates walking, cycling, landscaping and future public transport within the corridor design, and stages infrastructure to meet demand over time. The proposal is therefore generally consistent with Policy 25.14.2.1e.

Objective / Policy	Comment
Urban design 25.14.2.1f i. Provide high quality, safe, efficient, convenient, multi-modal connections for everyone moving from place to place. ii. Enable transport corridors to perform their movement and place functions within the city's transport corridor hierarchy. iii. Establish and protect streetscape amenity and recognise and provide for place functions. iv. Where appropriate, realise opportunities to enable everyone to be active, play, explore the city, and have fun within transport corridors and the transport network.	The development is consistent with Policy 25.14.2.1f. The Residential South and Industrial North masterplans integrate transport and urban design so that streets function not only as movement routes, but also as part of the public realm and neighbourhood structure. The Urban Design Assessment, **V2 Appendix 10 – Urban Design Assessment and V3 Appendix 10 – Urban Design Assessment**, identifies a legible hierarchy of public streets and private accessways, supported by walking and cycling connections, links to open space, and a central neighbourhood focus, particularly for Residential South. In relation to the specific components of the policy: High-quality, safe, efficient and convenient multi-modal connections: The development provides a connected network of public roads, footpaths, shared paths, separated cycle facilities, pedestrian accessways and provision for future public transport. These connections extend beyond the Site to Forth Crescent, Macmurdo Avenue, Saxbys Road for Residential South and Kahikatea Drive / Greenwood Street for Industrial North, whilst connecting with adjoining rural land where appropriate, as part of the wider SL1 Growth Cell consideration. Safety is supported by active frontages, passive surveillance, short and direct pedestrian routes, street lighting and dedicated cycle facilities. • Movement and place functions: The road hierarchy deliberately distinguishes between different corridor functions. Wider collector roads accommodate higher movement demands, walking, cycling, landscaping and future public transport, while narrower local streets perform a predominantly local access function. The Industrial North road hierarchy deliberately interacts with the Hamilton Southern Links designation and creates a logical and strategic connection to support direct industrial expansion from the existing urban edge. • Streetscape amenity and place quality: The masterplan and Design Guidelines for Residential South include street tree planting, front yard landscaping, active

	frontages, visible entrances, management of garage dominance, façade treatment, lighting and the interface between buildings and public spaces. These measures will help ensure that streets are attractive and well overlooked and that the built and paved environment is softened by planting as the neighbourhood establishes. The proposed higher density and mixed-use activities are also concentrated around the neighbourhood commercial node, open space and riparian corridors, to reinforce activity and identity within the public realm. • Opportunities to be active, explore and recreate: The transport network is integrated with a wider system of parks, recreation reserves and blue green spaces. Walking and cycling routes connect into these spaces and to adjoining Resthills Park, which provides sports fields, a playground and informal recreation opportunities. Within Residential South itself, the riparian network, blue-green design approach, neighbourhood public park, and pedestrian accessways provide opportunities for walking, cycling and informal recreation beyond travel. Overall, Residential South and Industrial North provide a connected and multi-modal movement network that is integrated with the urban form and public realm. In particular the Residential South proposed street hierarchy appropriately balances movement and place functions, while active-mode infrastructure, landscaping, active frontages, lighting, open-space connections and the design of the commercial node and public neighbourhood reserve contribute to safe, attractive and enjoyable streets. The proposal is therefore consistent with Policy 25.14.2.1f.

Policy 25.14.2.1g – Priorities (i) Prioritise the needs of transport modes that are higher in the transport mode hierarchy. (ii) Enable and prioritise walking, cycling, micro-mobility, and public transport over private vehicles through: (a) Improving the quality, quantity, extent, amenity, playfulness, convenience, and performance of facilities for public transport, cycling, walking, and micro-mobility to attract more users; (b) Integrating land use and the transportation network in accordance with Policy 25.14.2.1a; (c) Improved design and management of parking, loading, and end of journey facilities. (i) Prioritise climate change adaptation and reduction of greenhouse gas emissions. (ii) Prioritise freight movement and high frequency public transport over private vehicles on the strategic transport network.	The SL1 Residential South and Industrial North Projects each align with Policy 25.14.2.1g. The hierarchy of transport modes is well understood and integrated into the Master Plans for each Project, and reflected of the layout and proposed connections to appropriate connections. The Industrial North project proposes to connect to Kahikatea Drive / Greenwood Street, recognizing the long-term strategic role of this connection. The Residential South project connects to local residential streets, and integrates improvements to facilitate the increased trips. The Appendix 16 ITA – Residential South and Industrial North, goes into specific detail on the prioritisng of walking, cycling, micro-mobility and public transport over private vehicles, this is reflected in the extensive proposed mitigations to improve access to and user experience on shared paths and connections to wider public transport networks. This will facilitate a high-quality, safe, efficient and convenient multi-modal outcome with connections that are integrated into the Master Plan for each and provide strong relationships to existing and proposed facilities within the wider Hamilton City transport network. The strong alignment with active and public transport modes aligns with the underlying policy on climate change adaptation and reduction in greenhouse gas emissions, which is furthered by the locational attributes of both Residential South and Industrial North and their contiguous and well-balanced location in the context of the wider Hamilton City urban environment, redistributing balance to the geographic attributes of the City. Industrial North facilitates an east-west collector, which long-term will link Tuhikaramea Road to Hamilton Southern Links, which strategically will create a freight movement corridor that is efficient and separate from other competing uses, like residential. Residential South integrates with the Ohaupo Road E82 corridor and will

	promote and enable higher frequency public transport overtime serving the wider catchment, like the Airport, Hospital, and key connectors.

Objective / Policy	Comment
Policy 25.14.2.1h – Parking and loading Manage the design, location, quantity, and pricing of any parking or loading infrastructure so that it is provided in a way that: (i) Is safe, convenient, and accessible for all users. (ii) Minimises adverse effects arising from supply of and demand for parking. (iii) Minimises adverse safety and efficiency effects on walking, cycling, micro-mobility, public transport, freight, and emergency services. (iv) Maximises opportunities for the efficient use of existing parking infrastructure. (v) Provides charging facilities and their associated electricity infrastructure for electric powered vehicles and micro-mobility devices, where required including for communal use. (vi) Encourages active modes, micro-mobility, and public transport. (vii) Ensures any required loading and drop-off spaces are available for each development and site. (viii) Provides for car-share, taxis, and ride-share where required.	The development is consistent with Policy 25.14.2.1h. Parking, loading, servicing and travel demand management measures have been considered in detail through the Integrated Transport Assessment (refer to Appendix 16 – Residential South and Appendix 16 – Industrial North), with different responses adopted for the residential lots, commercial node and industrial lots. In relation to the specific components of the policy: • Safe, convenient and accessible parking: The internal streets provide recessed on street parking, while individual residential lots provide on-site parking. The commercial node includes dedicated on-site parking, including accessible spaces. • Protecting walking, cycling and other transport modes: The design seeks to minimise conflicts between parking areas and pedestrians. • Efficient use of parking infrastructure: Parking is provided through a combination of recessed on-street spaces, individual parking and consolidated parking associated with the commercial node. • Supporting active modes and public transport: Cycle parking is provided for the commercial node. These measures sit alongside the wider walking, cycling and future public transport network to reduce reliance on private vehicle travel. • Overall, Residential South and Industrial North provide a coordinated parking, loading and servicing strategy that balances vehicle parking with walking, cycling, micro-mobility and public transport objectives. The combination of accessible parking, loading and servicing controls, cycle and micro-mobility facilities is consistent with Policy 25.14.2.1h.

Objective / Policy	Comment
End-of-journey facilities 25.14.2.1i Require provision of accessible, practical, secure, covered, end-of-journey facilities for users as close as practicable to their journey destination	The Industrial North Project includes large industrial buildings which will be capable of including end of journey facilities, should the site owner / operator wish to provide as part of wider staff amenities. For the Residential South Project each typology includes a garage which can be set up to include end of journey storage facilities, and the commercial node is capable of including an end of journey facility for staff, if the owner / tenants wish to establish this.

Objective / Policy	Comment
Policy 25.14.2.j – Public Transport Encourage growth in public transport patronage to reduce carbon emissions and minimise traffic congestion on transport corridors and demand for parking spaces by: (i) Upgrading public transport facilities and services, particularly on congested transport corridors. (ii) Supporting the transition to a rapid and frequent public transport network, including through policies 2.2.14a to 2.2.14h and policies 25.14.2.1j iii to vi. (iii) Improving the operational efficiency of the public transport network to make public transport faster, more reliable, and easier to use. (iv) Providing free, secure, and covered parking for bicycles and micro mobility devices at public transport Interchanges. (v) Ensuring good walking, cycling, and micro-mobility connectivity with public transport facilities. (vi) Providing public transport infrastructure on proposed or existing public transport routes as part of developing a new, or upgrading an existing, transport corridor.	The development is consistent with Policy 25.14.2.1j. Residential South and Industrial North have been designed to support future public transport use and to integrate with the existing Hamilton network, while also providing strong walking and cycling connections to existing and future bus stops. The Appendix 16 – Residential South and Appendix 16 – Industrial North ITA provide detailed assessments of the existing, planned and future public transport considerations. This is particularly important for the Residential South proposal where a deliberate design and enablement of higher uptake of active modes and public transport is anticipated as part of the wider development. The proposal supports public transport patronage by: • Building on the existing Ohaupo Road public transport services and providing improved pedestrian and cycle connectivity to these existing services; • Intersection and Ohaupo Road corridor improvements that will prioritise and facilitate future public transport connectivity • Centralised collector road, commercial node and public park helping provide a stronger future passenger catchment should services be established within the Residential South site; • Providing footpaths, cycleways and shared paths that connect throughout Residential South and Industrial North and to existing bus stops; • designing the collector network to support future route extensions through the development. Overall, Residential South and Industrial North provide the physical infrastructure and land use pattern necessary to support future growth in public transport patronage, including bus-ready streets and stops, strong walking and cycling connections and

	integration with existing services. The proposal is therefore consistent with Policy 25.14.2.1j.

Objective / Policy	Comment
Policy 25.14.2.1k – Effects of the Transport Network New or altered transport corridors shall: (i) Improve biodiversity, water quality, and air quality, and (ii) Reduce greenhouse gas emissions, and (iii) Adverse effects on the environment which cannot be avoided must be remedied or mitigated as far as practicable, while recognising: (i) The safety, access, and mobility needs of all users. (ii) The movement and place functions of new or altered transport corridor. (iii) The character and purpose of the adjacent land use.	The development is generally consistent with Policy 25.14.2.1k. The proposed transport network has been planned as part of the wider stormwater, landscape, ecological and urban design response for Residential South and Industrial North, rather than as a standalone road network. In relation to the matters identified in the policy: • Biodiversity and water quality: The transport network is integrated with a wider blue green system comprising wetlands, watercourses, stormwater reserves, riparian and buffer planting and retained vegetation. Stormwater from the development will be subject to treatment, attenuation and conveyance measures, with the landscape framework also supporting ecological enhancement and connectivity.

Objective / Policy	Comment
	• Air quality and greenhouse gas emissions: The proposal supports lower emission travel through comprehensive walking and cycling infrastructure, future public transport provision, connections to existing bus stops and future public transport investment and intended to reduce single occupant vehicle trips. • Avoiding, remedying and mitigating adverse effects: The ITA (refer to Appendix 16 – Residential South and Appendix 16 – Industrial North) identifies mitigation through staged access delivery, construction traffic management, monitoring, Safe System measures, and active mode provision. Subject to the recommended mitigation and conditions, residual transport effects are acceptable, while active mode and public transport effects are identified as positive. Wider environmental effects are also managed through the integrated stormwater, ecological, landscape and open space framework and associated consent conditions. The proposed corridors also recognise the safety, access and mobility needs of different users through footpaths, separated cycle facilities, future public transport provision and appropriate road hierarchy. Different street cross-sections reflect their intended movement and place functions. Overall, the Residential South and Industrial North transport networks balance movement needs with environmental, ecological and place outcomes. While some environmental effects associated with establishing a new urban transport network are unavoidable, these are addressed through integrated design, mitigation and conditions, while the network also supports active travel, future public transport, stormwater treatment, planting and ecological enhancement. The Residential South and Industrial North proposals are therefore generally consistent with Policy 25.14.2.1k.

Objective / Policy	Comment
Policy 25.14.2.1l – Adverse Effects on the Transport Network Where adverse effects of subdivision, use or development on the transport network cannot be avoided, remedy or mitigate the effects as far as practicable by: (i) Safely connecting to, and integrating with, the transport network in a manner consistent with the Transport Corridor Hierarchy, Policy 25.14.2.1g, and the Transport Mode Hierarchy. (ii) Protecting strategic and arterial transport networks and associated intersections. (iii) Managing reverse-sensitivity effects of land uses sensitive to adverse transport effects (e.g., noise). (iv) Promoting streetscape amenity through transport corridor design, providing for the Transport Mode Hierarchy, and encouraging a continuous tree canopy along transport corridors. (v) Ensuring performance, condition, safety, efficiency and long-term sustainability and affordability of the transport network. (vi) Ensuring that multi-use developments provide dedicated spaces for storage and collection of rubbish, food scraps, and recycling. (vii) Maximising opportunities to support and take advantage of existing public transport services.	The development is consistent with Policy 25.14.2.1l. The Integrated Transport Assessment (refer to Appendix 16 – Residential South and Appendix 16 – Industrial North) identifies the potential effects of Residential South and Industrial North on both the local and strategic transport network and proposes a suite of staging, design, monitoring and mitigation measures to ensure those effects are appropriately managed. In relation to the specific matters in the policy: • Safe connection and integration: Residential South and Industrial North connect to the surrounding network through Forth Crescent, Macmurdo Avenue, Saxbys Road for Residential South, and Kahikatea Drive / Greenwood Street for Industrial North, with development traffic directed primarily to the roads intended to accommodate it. The ITA finds that the development can be accommodated on the wider strategic network provided development is staged in step with delivery of the external access network and identified mitigations and improvements. • Protection of strategic and arterial networks: Strategic modelling shows changes within intersection and road corridor performance at different stages of development for both Residential South and Industrial North, including positive benefits with the implementation of outlined mitigations within Appendix 16 ITA. Both Residential South and Industrial North are staged over a longer period, and development is phased as wider infrastructure improvements occur. • Reverse sensitivity: The Noise and Vibration Assessment (refer to Appendix 27 Residential South and Appendix 27 Industrial North) specifically considers operational and construction noise effects, including effects received within Hamilton City, and recommends

Objective / Policy	Comment
	conditions to manage those effects. This provides an appropriate mechanism for managing potential transport-related noise effects on sensitive residential activities. • Streetscape amenity and mode choice: Streets are designed to provide footpaths, cycle facilities, landscaping and street trees, together with active frontages and lighting. These measures support both streetscape amenity and the transport-mode hierarchy while creating safe and attractive routes for pedestrians and cyclists. • Network performance, safety and long-term operation: The proposal includes engineering approval for each stage, construction traffic management, staged access triggers and ongoing monitoring. The ITA concludes that, subject to these measures, the proposal will not have unacceptable adverse effects on the safety or efficiency of the transport network. • Supporting existing and future public transport: Existing bus stops on Ohaupo Road, Saxbys Road, Kahikatea Drive, are accessible from the Residential South and Industrial North developments, while the collector network is designed for future bus services. Conditions require roads designed to accommodate buses, stop infrastructure and engagement with Waikato Regional Council (WRC) regarding extension or diversion of scheduled services as the development grows. Overall, the Residential South and Industrial North proposals integrate safely with the existing transport network, protect the function of strategic routes and intersections, provide for active and public transport, and include clear mitigation, staging and monitoring mechanisms. On that basis, adverse transport effects are appropriately avoided, remedied or mitigated and the development is consistent with Policy 25.14.2.1l.

Objective / Policy	Comment
Policy 25.14.2.1m – Integrated Transport Assessments Require Integrated Transport Assessments for new subdivision, use or development of a nature, scale or location that has the potential to generate significant adverse transportation effects.	The development is consistent with Policy 25.14.2.1m. Given the scale and nature of Residential South and Industrial North, a full Integrated Transport Assessment (ITA) (refer to **Appendix 16 – Residential South and Industrial North**) has been prepared by BBO in support of the substantive application. The ITA assesses the effects of the development across all transport modes, including walking, cycling, public transport, freight and general traffic, together with the integration of land use and transport, accessibility, safety, parking and servicing, construction traffic, network performance and the need for mitigation, staging and design responses. The assessment includes strategic and intersection modelling, local traffic distribution analysis, safety assessment and consideration of future transport conditions. It also identifies mitigation and conditions relating to staged access, construction traffic management, public transport, active modes, and monitoring. The ITA goes into detailed staged implementation for both intersection improvements, shared path provisions, and wider supporting infrastructure to tie the existing and planned network together. Subject to these measures, the ITA concludes that residual transport effects are acceptable and manageable, with positive effects for active modes and public transport. Overall, an appropriately comprehensive ITA has been undertaken for Southern Links 1, which covers both Residential South and Industrial North, consistent with the scale and potential transport effects of the proposal. The development is therefore consistent with Policy 25.14.2.1m.

Objective / Policy	Comment
Travel Plans **25.14.2.1n** Require Travel Plans to be prepared and implemented for development or activities of a nature, scale or location that has the potential to generate significant movement of people.	The Residential South and Industrial North Projects are both supported by Appendix 16 ITA, which details a range of methods and considerations for promoting active modes, public transport and wider integration with existing services. Importantly, the ability for travel plans, or similar type of informative assessments, could occur as part of a condition of consent, however as presented in the Appendix 16 ITA, both the Industrial North and Residential South have comprehensive planned staging and infrastructure triggers to support a phased development of Southern Links 1. Accordingly, the Appendix 16 ITA, and the proposed conditions of consent are considered broadly consistent with Policy 25.14.2.1n.

Objective / Policy	Comment
Policy 25.14.2.1o – Access **25.14.2.1o** i. Require vehicle access between properties and the following transport corridors to be from a rear lane or side road lower in the transport corridor hierarchy: A. Major Arterials. B. The Strategic Network. C. A Pedestrian Focus Area. D. Transport corridors that will carry a Cross-City Connection. ii. Design, manage, and maintain rear lanes to: A. Be safe and accessible for pedestrians, cyclists, micro-mobility device users, and vehicle drivers. B. Provide unrestricted access for emergency vehicles and rubbish, food scraps, and recycling collection vehicles. C. Be connected to a transport corridor in at least two locations to always provide unrestricted alternative access and egress. D. Ensure the on-going and long-term maintenance of the pavement and services within the rear lane. iii. Design parking and loading areas so that reverse manoeuvring of vehicles does not occur onto or off an arterial transport corridor, a transport corridor in the Central City Zone, Business 1 to 7 Zones, or	The development is generally consistent with Policy 25.14.2.1o. The Residential South and Industrial North developments adopt a movement network which has been designed to manage vehicle access in a way that protects higher order routes, limits conflicts with pedestrians and cyclists, and provides safe servicing and emergency access. In relation to the specific matters in the policy: • Access from higher-order corridors: Rear lanes are used where direct vehicle access from higher-order roads or roads containing dedicated cycle facilities would be undesirable. Where a rear lane interfaces with a higher order road, vehicle access is instead taken from the lower order local road network, while pedestrian and cycle connections are retained. This reduces the number of vehicle crossings on more important movement routes. • Rear-lane design: A number of rear lanes are proposed, generally as 8 m-wide shared accessways serving rear-loaded residential lots. They provide two-way vehicle movement and connect to the public street network at two or more locations. Larger rear lane arrangements include additional connections where practicable, improving access choice and resilience. Their detailed design is also supported by requirements for lighting, passive surveillance, landscaping and fencing so they function as safe, low-speed shared environments. • Minimising vehicle crossings: Rear loaded terrace housing is used in part to remove driveways and garage doors from key street frontages. This reduces the frequency of vehicle crossings, improves continuity for pedestrians and cyclists and supports more continuous active frontages and landscaping. • Forward vehicle movements and servicing: The ITA (refer to Appendix 16 Residential South and Industrial North) confirms that the internal network has been designed to accommodate service, waste and emergency vehicles, with

	Cross-City connections.	vehicle tracking undertaken against relevant design vehicles and HCC waste guidelines.
iv.	Require all rubbish, recycling, and food scraps collection vehicles to enter and leave sites in a forward direction.	• Separation of pedestrian and vehicle access: The commercial node provides a dedicated pedestrian route in addition to vehicle access, while the wider development provides footpaths on all internal streets and separate walking and cycling connections.
v.	Other than for developments generating few vehicle movements each day, require pedestrian access from transport corridors that is separate from vehicular access.	• The parts of the policy relating specifically to the Central City Zone, Business 1–7 Zones and public access along the Waikato River are not directly relevant to Residential South and Industrial North given the location and nature of the proposal.
vi.	Minimise the number of vehicle crossings to improve safety for walking, cycling, and micro-mobility.	• Industrial North industrial lot accesses have been limited to the lower road hierarchy where available, including no direct access to future Hamilton Southern Links and reduced access to the east / west collector.
vii.	Discourage new vehicle accesses within the Central City Zone and Business 1 to 7 Zones to: A. Give priority to pedestrian movement, safety, and amenity; and B. Provide for continuity of building frontage and associated activities at street level.	• Industrial North and Residential South (commercial node) parking and manoeuvring areas have been designed to avoid any offsite reverse manouevring. Overall, Residential South and Industrial North appropriately manage vehicle access through the use of rear lanes, lower order streets, limited crossings, forward vehicle movements and separate pedestrian facilities. These arrangements protect higher-order routes and active mode infrastructure while providing safe and functional access for residents, servicing and emergency vehicles. The proposal is therefore generally consistent with Policy 25.14.2.1o.
viii.	Maintain and enhance public access to and along the Waikato River in accordance with Policy 2.2.2b.	

Objective / Policy	Comment
Policy 25.14.2.1p – Hamilton Airport airspace Protect Hamilton Airport's airspace from intrusion by potential hazards to aircraft flight paths.	Policy 25.14.2.1p is relevant to the Residential South development, where the Residential South site falls within the wider conical surface, which captures the broader airport environ, however the establishment of residential activity within the outer edge of the conical surface will not introduce any new or expected hazards, as the residential development is essentially an extension of the urban boundary of Hamilton. The Industrial North Project is outside of the Hamilton Airport airspace entirely and is not relevant.

Objective / Policy	Comment
Policy 25.14.2.1q – Biodiversity in Transport Corridors Encourage the planting, retention, and maintenance of indigenous trees and vegetation within transport corridors, where appropriate, to recognise and reflect ecological, amenity, cultural, and landscape values and to support the establishment and enhancement of ecological corridors.	The development is consistent with Policy 25.14.2.1q for the following reasons: • Landscape planting is integrated throughout the transport network. The proposed street hierarchy incorporates dedicated areas for landscaping alongside pedestrian, cycling and vehicle movement. In particular, the collector roads include landscaping areas within the road reserve, while the local streets also provide opportunities for street landscaping. • Street trees form an integral part of the landscape framework. The Urban Design Assessment (refer to Appendix 10 Residential South and Industrial North) confirms that street tree planting is proposed throughout the development, together with front-yard landscaping. As this vegetation establishes, it will improve streetscape amenity and soften the built and paved character of the new urban environment. • Planting within and adjoining transport corridors forms part of a wider connected landscape response. The proposal establishes an extensive blue green network incorporating a wetland, riparian corridor, stormwater areas, riparian and buffer planting, parks and recreation reserves. The Landscape and Visual Assessment (refer to Appendix 12 Residential South and Industrial North) identifies that this planting will contribute to habitat diversity, resilience and stronger connections between land and water across the Site. The landscape framework supports ecological as well as amenity and landscape outcomes. The existing Site contains fragmented vegetation associated with shelterbelts, drains and wet areas that provides limited but important habitat and ecological connections. The proposal builds on this through a substantially more structured blue green and planting network, including street trees, riparian planting and ecological planting. The Landscape and Visual Assessment also identifies street trees, ecological planting, wetland planting, riparian and buffer planting as important components of the long-term landscape framework.

Objective / Policy	Comment
	Overall, the proposal is consistent with Policy 25.14.2.1q. Planting is integrated within the proposed transport corridors and connected with the wider blue-green network, contributing to streetscape amenity, landscape character and ecological connectivity across the development.

Attachment 2

Transportation Matters and Responses

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Memo

To	Fraser McNutt / Sam Le Heron (Barker & Associates)
CC	Robert Dol / Dillon Kelliher (Colliers)
From	Siva Balachandran
Date	8 October 2026
Job No.	149240 / 149340
Job name	SL1 Industrial and Residential
Subject	**FTAA-2609-1294 EPA Request for Further Information – Transportation Matters**

1. Introduction

This memorandum has been prepared to assist with responding to the EPA Request for Further Information dated 24 September 2026. The memorandum addresses the transport matters identified in Item 4 and the transport-related aspects of Item 5.

The focus of the responses below is whether the lodged Integrated Transport Assessment ("ITA") contains sufficient information to enable understanding and assessment of the transport effects of the proposal for completeness review purposes. The responses are not intended to alter the conclusions of the ITA, but rather to clarify the level of assessment already undertaken and explain why the remaining matters are appropriately addressed through subsequent design and delivery processes.

2. Item 4

2.1 Ohaupo Road / Lambert Court Signalised Intersection

Regarding Hamilton City Council's ("HCC") expressed concern that "important aspects of the proposed mitigation appear to be deferred to future detailed design", HCC has not identified the specific aspects it considers to be deferred.

However, significant assessment and conceptual design work has been undertaken and BBO consider that the information contained within the ITA (Section 15.2.3) is sufficient to understand, evaluate and assess the likely transport effects associated with the proposed mitigation measures. The conclusions reached within the ITA do not rely on unresolved transport assessment matters or untested mitigation measures.

Section 15.2.3 in the ITA does not simply identify signalisation of the intersection as a future mitigation measure requiring further assessment. Rather, the ITA:

- Assesses the performance of the existing priority-controlled intersection.

- Demonstrates the need for capacity and safety upgrades, for which signalisation is appropriate in the context.
- Develops a concept signalised intersection layout (Figure 58 in the ITA and attached as Appendix A to the ITA).
- Proposes an indicative signal phasing sequence for operation (Figure 59 in the ITA).
- Assesses the retention of the service lane as the fourth leg of the intersection.
- Considers the alternative of removing the service lane access.
- Undertakes SIDRA intersection modelling demonstrating acceptable operation of the signalised intersection under the assessed development scenarios.

Accordingly, all key questions relating to intersection form, operational performance, pedestrian connectivity and network function have already been assessed. However, we provide the following summary of the key assessment matters and mitigation in the ITA given it is unclear what aspects HCC are referring to specifically.

The ITA (Section 15.2.3) also adopts a specific pedestrian movement strategy rather than deferring consideration of pedestrian provision to future design. The concept signalised intersection layout assessed within the ITA includes pedestrian crossings across Lambert Court and the service lane approaches, while relying on the existing signalised pedestrian crossing approximately 105 m east of the intersection as the primary crossing point across Ohaupo Road itself. This approach was intentional and reflects the proximity of the existing crossing facility and its connection with the bus stop facility on Ohaupo Road. The operational relationship between the proposed signalised intersection and the existing pedestrian crossing was evaluated within Section 15.2.3 in the ITA. The assessment concluded that the spacing between the two facilities is sufficient to accommodate future coordinated signal operation, if required, and does not give rise to unacceptable operational effects. The existing signalised crossing is therefore intended to remain the primary pedestrian crossing facility across Ohaupo Road, with the proposed signalised intersection facilitating pedestrian movement across Lambert Court and the service lane. The pedestrian connectivity strategy therefore forms part of the assessed transport solution rather than a matter left unresolved for future consideration.

Similarly, the treatment of the service lane has already been considered within Section 15.2.3 in the ITA. The assessment evaluates both retention and removal of the service lane access and concludes that retaining the service lane as the fourth leg of the signalised intersection is preferable from a road safety perspective. This conclusion was reached having regard to the potential safety implications associated with redirecting traffic to the alternative northern access point, which would require additional right-turn and merging manoeuvres across multiple traffic lanes on Ohaupo Road. The decision to retain the service lane therefore represents an assessed transport outcome.

NZ Transport Agency Waka Kotahi ("NZTA") had previously raised similar comments during review of draft versions of the ITA. These included the proximity of the existing signalised pedestrian crossing, queue interaction between the two signalised facilities, the operation of the service lane, and cyclist accommodation through the corridor. Those matters were specifically considered through development of the final signalised intersection concept and informed the transport strategy ultimately adopted in the ITA.

The ITA (Section 15.2.3 and Table No: 47 Item 16) notes that the separation distance between the proposed signalised intersection and the existing pedestrian crossing is approximately 105 m, equating to about seven seconds travel time at an operating speed of 50 km/h and approximately nine seconds travel time at 40 km/h. This exceeds the desirable minimum five-second travel time separation referred to in Austroads guidance[1].

[1] Austroads Guide to Road Design Part 4A: Unsignalised and Signalised Intersections, Section 10.3.2

The ITA (Section 15.2.3) also specifically assessed the interaction between the proposed signalised intersection and the existing signalised pedestrian crossing. While the modelling identified that the 95th percentile queue distance on the southern Ohaupo Road approach could extend beyond the pedestrian crossing in some scenarios, the average queue length was approximately 75 m and therefore shorter than the separation distance to the crossing. This indicates that queueing beyond the pedestrian crossing is associated with higher demand operating conditions rather than typical network operation. In any event, the presence of a queue extending through the pedestrian crossing does not, in itself, indicate a safety issue. Queueing at signalised pedestrian crossings occurs on many urban arterial corridors and the assessment did not identify any resulting safety concerns associated with the interaction between the proposed signalised intersection and the existing pedestrian crossing.

Cyclists are accommodated through the wider active mode strategy assessed within the ITA, which directs cyclists to the off-road shared path facilities on Ohaupo Road between Saxbys Road and Houchens Road rather than requiring cyclists to navigate the signalised intersection itself. This transport approach was also developed in response to earlier feedback received from NZTA and forms part of the wider active mode network strategy assessed in the ITA.

The remaining matters are therefore engineering refinements associated with implementation of the adopted transport solution rather than unresolved transport assessment issues. The proposed consent framework also secures the timing, delivery, detailed design and review of the Ohaupo Road / Lambert Court signalised intersection. In particular, Proposed Condition 281 requires the intersection to be upgraded prior to residential development generating traffic through the intersection and identifies a four-arm signalised intersection as the anticipated treatment. Proposed Conditions 287 and 288 require the relevant transport infrastructure to be designed, approved and implemented as part of the development staging process, while Proposed Condition 289 requires Safe System Audits to be undertaken prior to construction, during construction (where appropriate) and prior to opening the infrastructure to traffic. These processes provide for the detailed development of matters such as traffic signal design, services coordination, street lighting coordination and Safe System Audit outcomes. Importantly, those matters do not affect the fundamental transport conclusions reached in the ITA, namely that a four-leg signalised intersection at Ohaupo Road / Lambert Court is a feasible, effective and appropriate transport mitigation measure capable of accommodating the forecast traffic demand associated with the Project. The ITA establishes the transport strategy, operational form and effectiveness of the proposed mitigation, while the proposed consent conditions provide the mechanism through which the detailed design and implementation of that mitigation is secured.

2.2 Industrial North Interim Option B and Transition to Hamilton Southern Links

HCC has expressed concern regarding the transition between Interim Option B and the ultimate Hamilton Southern Links ("HSL") network.

The ITA (Sections 8.1 and 15.1) specifically considers whether a feasible pathway exists whereby Industrial Development can proceed independently of HSL delivery while preserving the ability to integrate with the future HSL network when it is delivered.

The assessment in Sections 8.1 and 15.1 in the ITA demonstrates that Interim Option B can accommodate the full assessed Industrial Development independently of HSL delivery while preserving the ability to integrate with the future HSL network. It further demonstrates that the arrangement does not preclude future HSL implementation.

A key objective of Interim Option B is to minimise sacrificial infrastructure while preserving flexibility for future integration with HSL. This is reflected in the Greenwood Street / Kahikatea Drive roundabout concept, which was deliberately developed having regard to the ultimate HSL roundabout arrangement. Key elements of the concept, including the overall roundabout footprint, central island geometry and northern slip lane arrangement, were retained where practicable so that future reconstruction requirements and network disruption can be minimised should HSL proceed.

Importantly, the assessment does not just assume that a future transition will be possible. Rather, it evaluates whether the proposed interim arrangement can operate independently while maintaining compatibility with future HSL outcomes.

The detailed engineering transition cannot presently be defined with greater precision for sound reason. The ultimate HSL infrastructure remains subject to NZTA-led design development, further detailed transport assessment and modelling, funding decisions, statutory approvals, construction staging decisions and infrastructure delivery programmes. In addition, the ultimate HSL corridor may involve land, infrastructure and network decisions beyond the boundaries of the current application and outside the control of the Applicants.

From a transportation engineering perspective, the relevant question is not whether the interim design perfectly integrates with the ultimate HSL design (which is not locked down), but rather, does the Project prejudice future HSL delivery or the expected future intersection form. BBO considers that the ITA addresses that question directly and demonstrates that it does not. Attempting to prescribe the detailed transition arrangement at this stage is not possible as it would require assumptions regarding future state highway design outcomes, corridor geometry, network staging and infrastructure delivery programmes that are not currently known and sit outside the scope of the substantive application.

Accordingly, BBO considers that insofar as is reasonably practical, the ITA demonstrates that a feasible and compatible pathway exists between Interim Option B and the future HSL network based on the current information available for HSL. Interim Option B recognises that the timing for the ultimate HSL highway is unknown, but it does not preclude refinements through future NZTA processes, investigations and design.

2.3 Future Minor Arterial Road Connection

HCC has sought clarification regarding the role and timing of the proposed future minor arterial road and its relationship to later development stages.

Section 11.1.2 in the ITA establishes that the future minor arterial corridor performs both a local development function and a wider strategic transport function.

At the Project level, the corridor forms part of the future transport framework serving the Residential Development and supports future public transport opportunities identified through the assessment. More broadly, the corridor safeguards a strategically important future transport connection through the wider SL1 Growth Cell and preserves the opportunity for future public transport connectivity towards Houchens Road and other adjoining growth areas.

The future corridor should therefore not be viewed solely as infrastructure servicing the current Residential Development. Protecting the corridor at the subdivision stage avoids future development sterilising the route and preserves future network connectivity opportunities within the wider SL1 Growth Cell.

Importantly, the ITA (Section 11.1.2) does not rely on delivery of the full ultimate corridor to support this initial development proposal. The assessment identifies the transport infrastructure that is required to support the initial SL1 Residential Development and future-proofs for continued development of the minor arterial road corridor as growth continues in SL1. The balance of the corridor is not required to mitigate the

effects of the Residential Development proposal and is anticipated to be delivered progressively as future stages of development occur within the wider SL1 Growth Cell and additional network connections become necessary.

This approach reflects a transportation engineering response that provides for both safeguarding a future strategic transport corridor for the growth cell and constructing infrastructure that is required to mitigate the effects of the current development proposal.

Accordingly, BBO considers the ITA sufficiently explains both the role of the minor arterial road corridor in the context of the ultimate SL1 growth cell, and the reasons for its staged implementation beginning with this initial development proposal.

3. Item 5

3.1 543-Dwelling Threshold

HCC and Waipā District Council have referred to the 543-dwelling threshold identified within the ITA as an "effective cap".

BBO considers that this interpretation does not accurately reflect the conclusions of the ITA.

The ITA does not identify 543 dwellings as the maximum development yield for the Residential Development. Rather, it demonstrates that approximately 543 dwellings can be accommodated under the specific future-network assumptions adopted for the assessed scenario where HSL delivery has not yet occurred.

The significance of the 543-dwelling threshold is that it represents the extent of development demonstrated under the specific assumptions adopted within the assessed 'without HSL' scenario.

The ITA (Sections 15.2.2 and 15.5.2) expressly identifies the threshold as a transport reassessment trigger rather than a permanent development limit. The purpose of that trigger is to ensure that future development stages are assessed against the actual transport environment that exists when those stages occur, rather than relying indefinitely on assumptions adopted in 2026.

The rationale for reassessment is that future transport outcomes will be influenced by a range of factors that cannot presently be known with certainty, including actual traffic growth, realised trip generation rates, future public transport uptake, active mode uptake, development occurring within surrounding growth areas, future transport infrastructure delivery and the status and timing of HSL itself.

Indeed, the ITA specifically identifies examples where future reassessment could conclude that additional development may be accommodated beyond 543 dwellings. The reassessment process therefore creates a mechanism through which future transport conditions can be evaluated using the best available information at the relevant time.

BBO considers that the reassessment trigger should therefore be understood as an adaptive planning mechanism rather than a cap on ultimate development potential. It does not reduce the scale of development sought through the application. Rather, it provides a process for ensuring that future development stages (which are likely to occur 10+ years in the future) consider and respond appropriately to the transport environment and local and national infrastructure programmes that exist at the time.

4. Conclusion

BBO considers that the matters raised under Items 4 and 5 are not information gaps in the assessment of the transport effects of the development proposal, because the ITA report lodged with the application:

- Assesses the proposed Ohaupo Road / Lambert Court signalised intersection at a level sufficient to understand its operation and effectiveness.
- Demonstrates that Interim Option B provides a feasible interim Industrial Development access solution that remains compatible with future HSL delivery.
- Explains the role and staged delivery of the future minor arterial corridor.
- Clearly identifies the 543-dwelling threshold as a transport reassessment trigger rather than a permanent development limit.

Yours sincerely
Bloxam Burnett & Olliver



Siva Balachandran
Senior Transportation Engineer
[redacted]

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Attachment 3

Legal Memorandum

B&A
Urban & Environmental

BEFORE THE ENVIRONMENTAL PROTECTION AUTHORITY **FTAA- 2609-1294**

IN THE MATTER of the Fast-track Approvals Act 2024 ("FTAA")

AND

IN THE MATTER of a substantive application by Golden Ridge Farm Limited, Golden Ridge Park Limited, Industre Property Rua Limited, and Southpark Agri Development Limited for approvals for Southern Links 1, a listed project under Schedule 2

MEMORANDUM OF COUNSEL FOR THE APPLICANTS

Responding to Request for Further Information from the EPA

12 October 2026

Solicitors Acting: JR Welsh
ChanceryGreen

1. Introduction

1.1. This memorandum is filed on behalf of Golden Ridge Farm Limited, Golden Ridge Park Limited, Industre Property Rua Limited, and Southpark Agri Development Limited (together, the "Applicants") who have applied for approvals for Southern Links 1 (the "Project" or the "Application") under the FTAA. The Project is a listed project under Schedule 2 of the FTAA.

1.2. On 24 September 2026, the Applicants received a Request for Further Information ("RFI") from the Environmental Protection Authority ("EPA"), issued under s46(2A) of the FTAA.[1]

1.3. The RFI sets out several matters on which a response is sought. As part of that RFI, the EPA conveyed feedback expressed by Hamilton City Council ("HCC") and Waipā District Council ("WDC") (together the "Councils") regarding the scope of the Application (Item 5 of the RFI). In particular, the Councils outline concerns that:

- *The Southern Links 1 application was listed in the FTAA for the approximately 1035 residential allotments and for 66 hectares of industrial activity, while the Southern Links 1 substantive application has been lodged for 938 residential lots and 60 hectares of industrial activity.*

- *The application documents discuss the reliance on Hamilton Southern Links (HSL) and implications to this development. In the absence of HSL, the transport assessment imposes an effective cap of 543 dwellings and raises questions about how access to SL1 Industrial would be funded. This represents a 46% reduction from the 1,035 dwellings on which the decision to list the project was based.*

- *Reducing the scope to this extent will increase the likelihood that the original national or regional benefits that merited listing will not materialise and will not outweigh the adverse environmental effects of the proposal.*

1.4. This memorandum responds specifically to the comments from HCC and WDC in Item 5 of the RFI (a response to the remaining matters in the RFI is provided separately within the Planning Response Memorandum prepared by Barker & Associates and dated 12 October 2026). This memorandum addresses:

[1] Section 46(2A) provides that the EPA may request further information from the applicant for the purposes of its completeness and scope decision.

(a) why the Application falls within the scope of the Schedule 2 listing despite minor scale variations and the proposed transport staging mechanism; and

(b) why the Councils' concerns conflate the EPA's administrative completeness check under s46 with an expert panel's substantive decision-making role.

2. Scope of the Application

2.1. The primary legal submissions filed with the Application set out in detail why the Project falls within the scope of the Schedule 2 listing.[2] Counsel relies on those submissions, which are summarised below:

(a) The project description for the Project in Schedule 2 of the FTAA provides:

> *Subdivide land and develop approximately 1035 residential allotments across approximately 48 hectares, and land for industrial activity across approximately 66 hectares*

(b) The Application is for, in summary, the Residential South Development comprising 938 residential lots across approximately 46ha and associated dwellings, and a small (433m2 Gross Floor Area) commercial node; and the Industrial North Development comprising 22 industrial lots of varying sizes across approximately 60ha (of which approximately 41.4ha is available for industrial lots) and associated industrial buildings, and a small food and beverage node.

(c) The minor scale variations – representing a 9% reduction in residential lots (from 1,035 to 938), a 4% reduction in residential land area, and a 9% reduction in industrial land area – do not materially alter the nature or scale of the Project. The Application represents an outcome of detailed expert assessment and master-planning following the Project's listing in Schedule 2, including stakeholder engagement through the Future Proof Fast Track Action Team and with the Councils. The reduction in industrial land area is the result of the exclusion of 16 and 16A Wickham Street, which are already subject to implemented consents. These variations are minor in scale, responsive to pre-lodgement feedback, do not materially reduce the Project's significant regional benefits and reflect the precise operational flexibility the word "approximately" in Schedule 2 is intended to accommodate.

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[2] At paragraphs 6.5 – 6.14.

(d) The High Court in *Jones v EPA*[3] established that Schedule 2 descriptions do not set rigid "inner limits" and substantive applications for projects of reduced scope can be permissible.[4] The Court confirmed that the use of the word "approximately" in Schedule 2 project descriptions explicitly provides for a degree of flexibility.

In reaching that view, the Court observed that the FTAA explicitly contemplates that projects will be modified as they progress, including pre-lodgement, and that requiring substantive applications to be exactly the same as Schedule 2 would lead to a "*strange outcome that Parliament could not have intended*", such as a housing project listed for 1000 houses being non-compliant if it applied for 999 houses.[5]

The Court also rejected the imposition of other rigid inner limits, given the practical uncertainty this would create:[6]

> *…if Schedule 2 described a 1000 house project, would an application for 950 houses be the 'same' project? What about an application for 900 houses? Or an application for 600 houses? Parliament could not have intended this kind of uncertainty*.

Importantly, the Court recognised that the consequences of a reduction in scope are addressed through the expert panel's assessment of the project's benefits, rather than through a rigid scope threshold:[7]

> *Reducing the scope of a project may reduce the benefit of the project for the applicant. In addition, if a project's scope is reduced too much, it will increase the risk that the panel concludes that the project does not have sufficient regional or national benefits to be approved*.

(e) This approach is supported by several other fast-track decisions, including Homestead Bay (2,531 units, including superlot capacities was within a "reasonable range" of the listed 2,800 allotments), Delmore ("between 1,217 and 1,248" residential dwellings were considered within scope of the listed 1,250), Sunfield (14% reduction in employment area and a 3% reduction in the overall project development area), Mt Iron Junction (5% housing reduction), and Foxton Solar (9% increase in project area).

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3 [2026] NZHC 1872.
4 See [35]-[41] of *Jones v EPA* and paragraph 6.11 of the legal submissions provided with the Application.
5 *Jones v EPA* at [37]-[38].
6 At [39].
7 At [41].

2.2. Holding applicants to an absolute, inflexible floor would frustrate the delivery of listed projects and run contrary to the enabling purpose of the FTAA; ignore the deliberate inclusion of "approximately" in the Schedule 2 listing; potentially frustrate pre-lodgement consultation and expert assessments; and be contrary to the direction of the High Court in *Jones v EPA*. Accordingly, Counsel submits that the EPA can be entirely satisfied that the Application remains within the scope of its Schedule 2 description.

2.3. Further, notwithstanding the minor scale variations, the Project will continue to deliver the significant regional benefits that merited its listing. Based on the economic assessment by Insight Economics, the Industrial North component is estimated to deliver $2.41 billion in net economic benefit, support 1,830 job-years of employment during construction and, at full build-out, support nearly 1,540 ongoing FTE jobs and $144 million in wages and salaries every year, while substantially increasing greater Hamilton's industrial land supply at a time when the city faces a projected long-term deficit of industrial capacity. The Residential South component is estimated to deliver $266 million in net economic benefit, support 1,830 job-years of employment during construction (around 203 full-time jobs per year) and make a substantial contribution to housing capacity in a sub-regional market experiencing persistent shortfalls. The Project will also provide a defined demand base that directly strengthens the business cases for, and supports the delivery and sequencing of, the Southern Links Road of National Significance and the Southern Wastewater Treatment Plant.[8]

3. The transport trigger

3.1. With respect to the Councils' comments regarding reliance on Hamilton Southern Links ("HSL"), the characterisation of the dwelling threshold as an "effective cap" or "reduction in scope" is misplaced.

3.2. The Application seeks approvals for the full 938 residential lots and 60 hectares of industrial development. The scope under s46(2)(b) is determined by the physical works and subdivision layout applied for, which relates directly to the listed project. Staging does not alter the physical extent of the development being applied for.

3.3. The transport modelling within BBO's Integrated Transport Assessment ("ITA")[9] confirms that the Residential South development can operate with acceptable transport effects up to 543 dwellings (in a scenario that does not include the delivery of the HSL). Beyond this, an updated transport assessment ("UTA") is required to evaluate receiving

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8 Primary legal submissions at paragraphs 4.9-4.10, referring to the Economic Reports by Insight Economics (Appendices 2R and 3R to the Substantive Application Report).

9 Volume 2 Residential South and Volume 3 Industrial North – Appendix 16: Transport Assessment.

environment assumptions and determine if additional mitigation is required. This represents an appropriate and reasonable approach by the Applicants. As stated in the ITA, the function of this mechanism is to confirm network performance:[10]

> *This assessment requirement should be regarded as a transport reassessment trigger rather than a permanent development limit. Its purpose is to provide a mechanism for confirming whether the assumptions underpinning the current assessment remain appropriate as development progresses and whether any additional transport mitigation is required.*

3.4. Proposed consent conditions directly address this. The ITA recommends, and the Applicants have proposed, a consent condition that requires the Consent Holder to submit a UTA prepared by a transport engineer prior to occupation of development exceeding 543 dwellings:[11]

> ***543-Dwelling Comprehensive Reassessment Threshold***
>
> *(285) 543 dwellings is a comprehensive transport reassessment threshold and not a development cap.*
>
> *Prior to occupation of development exceeding this threshold, the Consent Holder shall prepare a UTA in accordance with Condition 272.*
>
> *In addition to the matters required by Condition 272, the UTA shall specifically assess:*
>
> *(a) the operation and safety of the Ohaupo Road corridor;*
>
> *(b) whether the right-turn restriction at Ohaupo Road / Resthill Crescent identified in the 2026 ITA remains necessary and, if so, its approximate timing;*
>
> *(c) the status of HSL and any resulting changes to route choice and network capacity;*
>
> *(d) whether further walking, cycling or public transport-supporting infrastructure is required; and*
>
> *(e) the appropriate mitigation and/or subsequent transport assessment threshold for further development.*

[10] Section 15.2.2 (at page 90).
[11] Page 112 of the ITA. See proposed Condition 285 of the Waipā DC Land Use Consent (V2 Attachment 10).

Development beyond 543 dwellings may proceed in accordance with the mitigation and subsequent assessment threshold, if any, identified by the UTA.

3.5. This proposed condition is designed to respond to any effects as the development progressively builds out and to be responsive to any changes in the wider transportation environment at that time. It represents a responsible pathway to manage infrastructure capacity dynamically.[12]

3.6. The mechanics of the Applicants' proposed Condition 285 are conceptually similar to the traffic survey and monitoring trigger conditions approved by the Expert Panel in the *Delmore* decision.[13] In *Delmore*, the conditions established dwelling thresholds (1,450, 1,600, and 1,750 dwellings) that triggered a requirement for the consent holder to undertake real-world traffic surveys and prepare a "Traffic Monitoring Report" to confirm intersection performance and implement proportionate design, consultation, and mitigation only if a Level of Service E threshold was actually crossed.

3.7. The Councils are postulating what might occur under theoretical, unmitigated network conditions, rather than responding to the actual, managed staging pathway proposed in the Application. Seeking approvals for the full 938 lots secures this development pathway and "enables capacity" from the outset. As confirmed by the Expert Panel in *Homestead Bay*, establishing this master-planned capacity is itself a significant and certain regional benefit, even if the actual construction of the dwellings is delivered progressively as transport capacity becomes available.[14] The BBO transport modelling demonstrates that this capacity can be accommodated over time through the progressive implementation of the staged upgrades and the proposed Condition 285 performance-confirmation trigger.

3.8. Accordingly, the 543-dwelling trigger is an effects management mechanism rather than a cap limiting the Project's scope. It enables the physical capacity of 938 dwellings to be consented and secured from the outset, while providing a clear process to confirm network performance as development progresses. The adequacy of the condition is a substantive effects-management matter for an expert panel to evaluate, not a gateway compliance issue under s46.

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12 For completeness we note an error in section 8.3.5.1 of the Overview Report lodged with the Application which described an earlier version of this condition, which would have required an updated ITA to be certified by NZ Transport Agency Waka Kotahi, HCC and WDC before further dwellings were constructed. That description does not reflect proposed Condition 285, which is the condition the Applicants seek.

13 *Delmore* decision. See Conditions 15–21 in Appendix 1 – Conditions of consent.

14 *Homestead Bay* decision at [61].

4. Section 46 assessment

4.1. Section 46 of the FTAA establishes a gateway administrative procedure for the EPA to check the completeness and scope of a substantive application. Under s46(1), the EPA must decide "*whether a substantive application complies with subsection (2)*". Under s46(2), compliance is determined by an administrative check of whether:

(a) the Application complies with ss42, 43, and 44 (the information and filing requirements) (s46(2)(a)); and

(b) the Application relates solely to a listed project (s46(2)(b)).

4.2. This statutory test is exhaustive and administrative. The gateway check is designed to ensure that the Application contains the requisite technical information to be understood and that it relates to the listed project. It does not require the EPA under s46 to conduct a merits-based assessment of effects/impacts, infrastructure funding, or the adequacy of proposed transport staging. Those are matters for an expert panel.

4.3. In particular, the Councils' question as to how access to SL1 Industrial would be funded is not a matter for the s46 assessment. Since the Application was lodged on 11 September 2026, infrastructure funding has also been addressed by a specific statutory mechanism. Under the Local Government Act 2002, as amended by the Local Government (System Improvements) Amendment Act 2026 (which came into force on 19 September 2026),[15] territorial authorities may adopt or amend a development contributions policy within six months of a fast-track approval to recover growth-related infrastructure costs,[16] including on a cross-boundary basis.[17] The Councils' funding concerns therefore do not bear on whether the Application relates solely to a listed project under s46(2)(b).

4.4. Similarly, the Councils' concern regarding the "*likelihood that the original national or regional benefits that merited listing will not materialise and will not outweigh the adverse environmental effects of the proposal*" is not relevant to the EPA's decision on whether the Application is complete and within scope. The evaluation and balancing of a project's benefits against its adverse impacts is a substantive determination reserved for an expert panel.

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15 The Local Government (System Improvements) Amendment Act 2026 (the "Amendment Act") received Royal assent on 18 September 2026 and came into force on 19 September 2026: s2(1).

16 Local Government Act 2002 ("LGA"), ss102A(2)–(3), 198B(1) and 199AA(2)–(3), inserted by ss21, 28 and 29 of the Amendment Act.

17 LGA, s199AA(4)–(6); see also the definitions of "cross-boundary development", "host authority" and "service provider" in s197(1), inserted by s26 of the Amendment Act.

4.5. Counsel further observes that, more broadly, many of the Councils' comments relate to substantive, merits-based matters (such as the specific intersection designs, the timing of the minor arterial road, and the transition to the ultimate HSL network configuration). Nevertheless, the requests have been responded to even though under the FTAA, the Councils will have an opportunity to address these substantive matters when they are invited to submit comments under s53 during the expert panel's decision-making process.

5. Conclusion

5.1. The Application is only slightly reduced in scale from the Schedule 2 description, falling well within the acceptable margin of variance recognised in previous fast-track decisions, and confirmed by the High Court in *Jones v EPA*. Significant regional benefits will still arise from the Project.

5.2. The transport threshold of 543 dwellings is a standard, effects-based mechanism to manage and confirm network performance. It does not alter the scope of the Application.

5.3. Whether the transport staging is appropriate, and the undertaking of the overall proportionality assessment to weigh the Project's benefits against any potential adverse impacts, are substantive, merits-based matters for an expert panel to determine. It is submitted that the Application meets all completeness and scope requirements of s46 of the FTAA and that the EPA can accept the Application under s46(3) and refer it to an expert panel.

JR Welsh

Counsel for Colliers Project Leaders NZ Limited (as agents and representative of Golden Ridge Farm Limited, Golden Ridge Park Limited, Industre Property Rua Limited, and Southpark Agri Development Limited)

12 October 2026