

5 December 2025

Future Proof Implementation Committee

Attn: S 9(2)(a)

Via email: S 9(2)(a)

Submission on the North Waipa – South Hamilton Spatial Study – Scenarios and Options Report

Thank you for the opportunity to provide feedback on the North Waipa – South Hamilton Spatial Study and, specifically, the Scenarios and Options Report.

This submission is prepared on behalf of interests associated with a Fast-Track Approvals Act 2020 (FTAA) project located within the study area: (1) Southern Links 1 (SL1). This project is made up of the listed project described above, the SL1 Rogerson Block referred project and the soon to be submitted SL1 Houchens project. These projects each represent regionally significant residential, industrial, and strategic infrastructure opportunities that should materially influence the assumptions used in preparing the scenario testing for this work.

General Comments on the Scenario Approach

Since the gap analysis was completed, we understand focus has moved to the development of Scenarios. Scenarios are used to stimulate discussion on a range of possible futures. They are not predictions; rather, they provide high-level direction for planning purposes and help visualise and explore possible pathways, test trade-offs, and guide strategic direction in the coming decades. Collectively, the five possible future scenarios span a spectrum — from Scenario 1's status quo to Scenario 2's coordinated delivery, Scenario 3's competitive acceleration, Scenario 4's economic boost driven by a development corporation, and Scenario 5's environmental protection.

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

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

A further limitation is that the current modelling does not factor in all development enabled through other processes such as the Fast-Track Approvals Act (FTAA). The scale of development likely to occur through FTAA projects is substantial and should materially influence growth assumptions and spatial outcomes. This is discussed further in the section below.

Alignment and Integration with FTAA and Future Regulatory Settings

A key concern and omission is that the Scenarios and Options Report does not explain or consider how FTAA projects whether listed, referred, or with substantive applications pending have been incorporated into the scenario development process. Scenarios Two, Three and Four touch on the role of FTAA projects, however not to the specificity or level expected when intending to inform future FDS planning. Further indication of how these projects have been accounted for, given their scale, statutory weight, and relevance to likely growth outcomes is important to be understood. Given the number of FTAA projects already within the spatial study area, and future potential projects, their omission limits the accuracy of the growth assumptions and spatial distributions being tested.

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

More broadly, the scenarios lack integration with the rapidly evolving FTAA project pipeline across the Waikato, and particularly the spatial study area. A substantial number of FTAA projects are in progress, many involving large-scale residential, industrial, and infrastructure components that will materially influence the availability of serviced land, regional housing and industrial capacity, and the sequencing of key infrastructure. These outcomes will also directly shape transport planning, including major connections such as the Roads of National Significance. Excluding these projects results in scenarios that do not accurately reflect real development drivers.

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

Fast-Track Projects within the Spatial Study Area

To illustrate the scale and significance of FTAA projects within the Spatial Study Area, we highlight below one live example currently progressing through the FTAA process. This project, Southern Links 1 (SL1) represents a major development that will materially influence growth patterns, housing supply, industrial land supply, infrastructure and economic activity across the spatial study area and wider. We consider that their inclusion in scenario modelling is essential to ensure that growth assumptions and spatial planning reflect real, imminent development outcomes rather than just potential projections.

Southern Links 1 (SL1)

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

The SL1 Growth Cell continues to promote integrated, strategic industrial land as part of the growth cell, no wet industry or noxious industry is anticipated. The SL1 Growth Cell via the various projects, continue to promote a variety of housing typologies and outcomes within the residential areas, to reflect the collocational benefits of the SL1 Growth Cell and the direct relationship to wider social infrastructure and employment opportunities.

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

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

Wider Opportunities

The spatial study area includes the potential for significant investment and alternative funding mechanisms. Opportunities for Public Private Partnerships (PPPs), NIFFCo (National Infrastructure Funding and Financing Limited), Council Controlled Organisations (CCOs) and similar alternatives, should be considered and factored into the emerging scenarios to appropriately respond to the reality of the golden triangle and continued high growth expectations in the spatial study area, and the wider strategic approach to boundaryless planning in the Waikato. Such opportunities would bring forward regionally significant infrastructure ahead of current timing and provide wider stimulus for higher growth scenarios to better inform future FDS planning.

Summary and Recommendations

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

- (1) Expanding the scenarios to incorporate a broader range of growth variations and stress test alternative development trajectories.
- (2) Integrating FTAA enabled development capacity including SL1 in its entirety, and other regionally significant projects into all relevant modelling and assumptions.
- (3) Providing transparent metrics that demonstrate how FTAA projects, RMA reforms, and infrastructure investment are factored into each scenario.
- (4) Embedding flexibility within the scenario methodology to ensure it remains agile and fit-for-purpose in informing future FDS processes.
- (5) Embedding a high growth scenario that better reflects alternative funding mechanisms for regionally significant infrastructure.

We consider with the undertaking of the above recommendations will enable a hybrid scenario to emerge, that better reflects the planned investment and growth that is being driven by regionally significant infrastructure and development projects. This will reflect the true role of the SL1 Growth Cell within the spatial study area and align with a wide approach to boundaryless planning and infrastructure servicing. We would expect a hybrid scenario will include attributes of Scenario 2 and 3 primarily, which reflect the true demand and opportunities that will be realised within the next 30-year horizon, whilst having additional regionally significant infrastructure projects like Hamilton Southern Links (RON) and Southern Wastewater Treatment Plant being established sooner than currently planned.

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

Yours sincerely | Nā māua noa, nā

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