

To: Ministry for the Environment (MfE)

From: Briar Belgrave, Fraser McNutt – Barker & Associates Limited

Date: 5 May 2026

Re: Planning Memorandum for **Awanui Links**

1.0 Introduction

1.1 Awanui Links

Swordfish Projects Limited, as the applicant, engaged Barker & Associates (**B&A**) to provide planning services for the masterplanning, consenting and design of **Awanui Links**. The **Awanui Links** site is located in the Waikato District and is accessible via Telephone Road (SH1B) to the south-west. The Site also adjoins several existing rural lifestyle residential properties, particularly to the west on the opposite side of Telephone Road and to the north-west. The Site is approximately 10 kilometres from the Hamilton City Centre. The Site is made up of 27 lots ranging in size from 3 to 6 hectares. The combined land area is approximately 123 ha. The conceptual Awanui Links Masterplan is shown in **Figure 1**, and contained within the Urban Design Memorandum.



Figure 1: Conceptual masterplan.

The purpose of this project is to establish a comprehensively master-planned mixed-use development in the Waikato District that integrates high-end tourism, lifestyle living, retirement accommodation, and light-

industrial activity around an 18-hole championship golf course. The project includes extensive visitor infrastructure, wellness and hospitality facilities, luxury villas, rural-residential lots, an integrated retirement village and care facility, and a dedicated light-industrial precinct.

Development is proposed to complement an 18-hole-golf course, which will be centred around a contemporary clubhouse, proshop, driving range, wellness centre, fine dining restaurant, and boutique hotel with associated event and conference facilities. The golf course is accessed via a local road which links the centre of the site to Telephone Road. Visitor accommodation will be set amongst the proposed fairways and artificial wetlands. Extensive planting, ecological restoration, and integrated water features have been proposed throughout the development to support amenity for future residents and visitors.

137 retirement living units are proposed to support the growing demand for retirement living in Hamilton and the wider Waikato Region. A mix of independent living villas will be provided and supported by a central care facility, healthcare and community facilities.

The rural residential lots are proposed at the north-eastern, and north-western boundaries of the site. Access to the rural residential lots and retirement village is proposed via a 20-metre-wide local road entering the site from the existing culvert to the west of the site and extending parallel to the northern and eastern boundaries. The local road is supported by two 10-metre-wide private access / right of ways to provide accessibility and circulation throughout the development. Allotments are generally sized at approximately 3,000 square metres, allowing for a variety of housing forms and landscape outcomes.

The proposed industrial area comprises nine lots ranging from 2300 – 5700 square metres (approximately 3.99 ha in total), all served by a 10 m right-of-way that partially utilises the existing farm access and one of the existing culverts at Telephone Road. The industrial lots are intended to accommodate rural service industries that are currently underprovided in the area, reducing the need for people to travel to other centres to access essential rural services. A 3,000 sqm solar farm is also proposed adjacent to the industrial area along the southern boundary providing on-site renewable energy generation.

The overall project will deliver significant lifestyle and wellbeing benefits for both the local community and the wider region, while also providing a unique, integrated tourism and recreation destination for conferences, working retreats, and wellness; creating a point of difference that is expected to attract visitors from outside the region.

Awanui Links will be delivered through a carefully planned staged approach to align closely with infrastructure provision, and in particular stormwater and transport infrastructure. Awanui Links will consist of stages for each land use development which could be delivered simultaneously. The proposed rural residential allotments will be delivered via two stages, retirement village three stages, golf course three stages and a single industrial development stage.

Apart from Stage 1 of each land use development occurring first, the subsequent stages may be delivered in any order in response to market demand. The stage boundaries will be confirmed through the substantive application process subject to detailed technical assessments, infrastructure investigations, and further design refinement.

1.2 Site Description

The site is of a regular shape and is approximately 123 hectares, and situated within the Waikato District, to the east of the Hamilton City boundary and situated between the rural communities of Puketaha to the

north and Matangi, refer to **Figure 2**. The existing Site consists of 27 lots, cumulatively forming an extensive greenfield area intended for urban growth.



Figure 2: Site locality plan.

The site is framed by Telephone Road to the south-west, the East Coast Main Trunk rail corridor to the south-east, and Holland Road running parallel to the railway line. These transport corridors provide key north-south and east-west links between Gordonton, Cambridge, Hamilton, and Morrinsville. The site sits at a strategic interface between Hamilton City's eastern urban edge and the surrounding rural landscape within the Waikato District.

The site is held in pasture and contains residential and accessory buildings and farm buildings a milking shed, and ancillary buildings located within the 28 Telephone Road land parcel. The sites topography is predominantly flat with a total level change of approximately 3m across the site (from 42m to 45m above sea level). The existing water courses are generally artificial in origin including a few farm drains and 2 constructive farm ponds. An off-site board drain along the west boundary has resulted in 5 existing entrances from Telephone Road through culverts over the drain.

In terms of vegetation, the site is dominated by exotic vegetation, shelterbelts, and grazed pasture, with some individual native saplings and small trees located within the shelterbelts. There are 2 small wetlands located in the north-western portion of the site, which potentially provide natural habitats that are ecologically sensitive. These wetlands are currently under investigation to further confirm their ecological status and conditions.

As illustrated in **Figure 2**, the surrounding land includes rural land held in pasture to the north, east, and west typical of the wider Waikato District. Several rural residential properties and lifestyle allotments are located adjacent to the site and on the opposite side of Telephone Road. Puketaha Primary School is the nearest educational facility serving the local area (approximately 6km from the site). Beyond this, a range of amenities and services are provided within Hamilton City, including grocery stores, hospitality venues,

and secondary schools. Comparable land uses to the proposed development, such as golf courses and retirement villages are primarily located within Hamilton’s eastern suburbs, including Rototuna and Fairfield.

1.3 Records of Title and Interests

The site consists of the Records of Title as identified in **Table 1** below. As the Records of Titles below demonstrate, the site while being rural, does not reflect a typical rural environment or landholding pattern. The site comprises 27 individual lots held under separate legal titles that have been in place since 1977. The individual lots create a fragmented baseline for the site – each lot is entitled to accommodate one dwelling as a permitted baseline and a minor residential unit as a permitted activity. Together these provisions establish a unique development baseline that differs significantly from a conventional rural property.

Table 1: Legal description of the site parcel.

Legal Description	Area (Hectares)	Landowner
Lot 1 Deposited Plan South Auckland 14821 SA212C/623	4.05	Melanie Jones & CB Trustee 2010 Limited
Lot 2 Deposited Plan South Auckland 14821 SA21C/624	4.05	Melanie Jones & CB Trustee 2010 Limited
Lot 13 Deposited Plan South Auckland 14821 SA25D/1289	4.23ha	Melanie Jones & CB Trustee 2010 Limited
Lot 11 Deposited Plan South Auckland 14821 SA25D/1287	4.28ha	Melanie Jones & CB Trustee 2010 Limited
Lot 10 Deposited Plan South Auckland 14821 SA25D/1286	4.23ha	Melanie Jones & CB Trustee 2010 Limited
Lot 4 Deposited Plan South Auckland 14821 SA21C/626	4.05ha	Melanie Jones & CB Trustee 2010 Limited
Lot 5 Deposited Plan South Auckland 14821 SA21C/627	4.05ha	Melanie Jones & CB Trustee 2010 Limited
Lot 6 Deposited Plan South Auckland 14821 SA21C/628	4.07ha	Melanie Jones & CB Trustee 2010 Limited
Lot 1 Deposited Plan 36551 SA933/285	6.07ha	Melanie Jones & CB Trustee 2010 Limited
Lot 19 Deposited Plan South Auckland 14821 SA25D/1295	4.13ha	Melanie Jones & CB Trustee 2010 Limited

Legal Description	Area (Hectares)	Landowner
Lot 7 Deposited Plan South Auckland 14821 SA25D/1283	4.13ha	Melanie Jones & CB Trustee 2010 Limited
Lot 18 Deposited Plan South Auckland 14821 SA25D/1294	4.17ha	Melanie Jones & CB Trustee 2010 Limited
Lot 8 Deposited Plan South Auckland 14821 SA25D/1284	4.16ha	Melanie Jones & CB Trustee 2010 Limited
Lot 17 Deposited Plan South Auckland 14821 SA25D/1293	4.21ha	Melanie Jones & CB Trustee 2010 Limited
Lot 9 Deposited Plan South Auckland 14821 SA25D/1285	4.19ha	Melanie Jones & CB Trustee 2010 Limited
Lot 16 Deposited Plan South Auckland 14821 SA25D/1292	4.25ha	Melanie Jones & CB Trustee 2010 Limited
Lot 15 Deposited Plan South Auckland 14821 SA25D/1291	4.29ha	Melanie Jones & CB Trustee 2010 Limited
Lot 11 Deposited Plan South Auckland 14821 SA25D/1287	4.28ha	Melanie Jones & CB Trustee 2010 Limited
Lot 14 Deposited Plan South Auckland 14821 SA25D/1290	4.19	Melanie Jones & CB Trustee 2010 Limited
Lot 12 Deposited Plan South Auckland 14821 SA25D/1288	5.71ha	Melanie Jones & CB Trustee 2010 Limited
Lot 13 Deposited Plan South Auckland 14821 SA25D/1289	4.23ha	Melanie Jones & CB Trustee 2010 Limited
Lot 7 Deposited Plan South Auckland 15049 SA14D/1252	4.24ha	Melanie Jones & CB Trustee 2010 Limited
Lot 6 Deposited Plan South Auckland 15049 SA14B/1251	4.39ha	Melanie Jones & CB Trustee 2010 Limited
Lot 5 Deposited Plan South Auckland 15049 SA14B/1250	6.13ha	Melanie Jones & CB Trustee 2010 Limited

Legal Description	Area (Hectares)	Landowner
Lot 4 Deposited Plan South Auckland 15049 SA14B/1249	6.01ha	Melanie Jones & CB Trustee 2010 Limited
Lot 3 Deposited Plan South Auckland 15049 SA14B/1248	4.39ha	Melanie Jones & CB Trustee 2010 Limited
Lot 2 Deposited Plan South Auckland 15049 SA14B/1247	4.23ha	Melanie Jones & CB Trustee 2010 Limited

The Records of Title for the site are subject to a number of interests (refer **Attachment 1**), as detailed below. Overall, there are no interests which will prevent the proposed works from being undertaken.

Table 2: Existing interests.

Title	Interest	Comment
SA14B/1246 (Lot 1 DPS 15049)	Transfer Interest 44864	Drainage rights in favour of the New Zealand Land Association Limited
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042 Applicant is Grantor.
	Mortgage to ASB Bank Limited	
	Easement Instrument 12934299.1	To convey electricity and telecommunications on DP 597077 in favour of WEL Networks Limited
SA14B/1247 (Lot 2 DPS 15049)	Transfer Interest 44864	Drainage rights in favour of the New Zealand Land Association Limited
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042 Applicant is Grantor.
SA14B/1248 (Lot 3 DPS 15049)	Transfer Interest 44864	Drainage rights in favour of the New Zealand Land Association Limited
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042

Title	Interest	Comment
		Applicant is Grantor.
SA14B/1249 (Lot 4 DPS 15049)	Transfer Interest 44864	Drainage rights in favour of the New Zealand Land Association Limited
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042
		Applicant is Grantor.
SA14B/1250 (Lot 5 DPS 15049)	Transfer Interest 44864	Drainage rights in favour of the New Zealand Land Association Limited
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042
		Applicant is Grantor.
SA14B/1251 (Lot 6 DPS 15049)	Transfer Interest 44864	Drainage rights in favour of the New Zealand Land Association Limited
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042
		Applicant is Grantor.
SA14B/1252 (Lot 7 DPS 15049)	Transfer Interest 44864	Drainage rights in favour of the New Zealand Land Association Limited
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042
		Applicant is Grantor.
SA21C/623 (Lot 1 DPS 14821)	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042
		Applicant is Grantor.
SA21C/624 (Lot 2 DPS 14821)	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	

Title	Interest	Comment
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042 Applicant is Grantor.
SA21C/625 (Lot 3 DPS 14821)	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042 Applicant is Grantor.
SA21C/626(Lot 4 DPS 14821)	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042 Applicant is Grantor.
SA21C/627 (Lot 5 DPS 14821)	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042 Applicant is Grantor.
SA21C/628 (Lot 6 DPS 14821)	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042 Applicant is Grantor.
SA25D/1283 (Lot 7 DPS 14821)	Subject to Section 348 Local Government Act 1974	
	Easement Certificate H122339	Right of way easement
	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042 Applicant is Grantor.

Title	Interest	Comment
SA25D/1284 (Lot 8 DPS 14821)	Subject to Section 348 Local Government Act 1974	
	Easement Certificate H122339	Right of way easement
	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042 Applicant is Grantor.
SA25D/1285 (Lot 9 DPS 14821)	Subject to Section 348 Local Government Act 1974	
	Easement Certificate H122339	Right of way easement
	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042 Applicant is Grantor.
SA25D/1286 (Lot 10 DPS 14821)	Subject to Section 348 Local Government Act 1974	
	Easement Certificate H122339	Right of way easement
	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042 Applicant is Grantor.
SA25D/1287 (Lot 11 DPS 14821)	Subject to Section 348 Local Government Act 1974	
	Easement Certificate H122339	Right of way easement
	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042

Title	Interest	Comment
		Applicant is Grantor.
SA25D/1288 (Lot 12 DPS 14821)	Subject to Section 348 Local Government Act 1974	
	Easement Certificate H122339	Right of way easement
	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042
		Applicant is Grantor.
SA25D/1289 (Lot 13 DPS 14821)	Subject to Section 348 Local Government Act 1974	
	Easement Certificate H122339	Right of way easement
	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042
		Applicant is Grantor.
SA25D/1290 (Lot 14 DPS 14821)	Subject to Section 348 Local Government Act 1974	
	Easement Certificate H122339	Right of way easement
	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042
		Applicant is Grantor.
SA25D/1291 (Lot 15 DPS 14821)	Subject to Section 348 Local Government Act 1974	
	Easement Certificate H122339	Right of way easement
	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042

Title	Interest	Comment
		Applicant is Grantor.
SA25D/1292 (Lot 16 DPS 14821)	Subject to Section 348 Local Government Act 1974	
	Easement Certificate H122339	Right of way easement
	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042
		Applicant is Grantor.
SA25D/1293 (Lot 17 DPS 14821)	Subject to Section 348 Local Government Act 1974	
	Easement Certificate H122339	Right of way easement
	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042
		Applicant is Grantor.
SA25D/1294 (Lot 18 DPS 14821)	Subject to Section 348 Local Government Act 1974	
	Easement Certificate H122339	Right of way easement
	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042
		Applicant is Grantor.
SA25D/1295 (Lot 19 DPS 14821)	Subject to Section 348 Local Government Act 1974	
	Easement Certificate H122339	Right of way easement
	Transfer B090603.5	Water supply right
	Mortgage to ASB Bank Limited	

Title	Interest	Comment
SA933/285 (Lot 1 DP 36551)	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042 Applicant is Grantor.
	Transfer 44864	Drainage rights in favour of the New Zealand Land Association Limited
	Mortgage to ASB Bank Limited	
	Land Covenant Instrument 12492329.1	Limited as to duration – Expires 31 December 2042 Applicant is Grantor.

1.4 Planning Context

The site is zoned Rural (Waikato) under the Waikato Operative District Plan (**WODP**) and General Rural Zone under the Waikato Proposed District Plan – Operative in Part (**WDP-OP**).

Under both the WODP and WDP-OP the Airport Obstacle Limitation Surface Overlay applies to the entire site.

Under the WDP-OP the KiwiRail designation KRH-2 runs along the south-western boundary of the site with the Rail Corridor Vibration Alert Area and Noise Control Boundary extending into part of the subject site.

The subject site is located within the Waikato River Catchment Area.

No other planning controls or overlays are located over the site under the WODP and WDP-OP and Waikato Regional Plan and Waikato Regional Policy Statement (**RPS**).

The zoning pattern of the site and surrounding environment is illustrated in **Figure 3**. The adjacent land is zoned Rural under the WODP and General Rural under the WDP-OP.

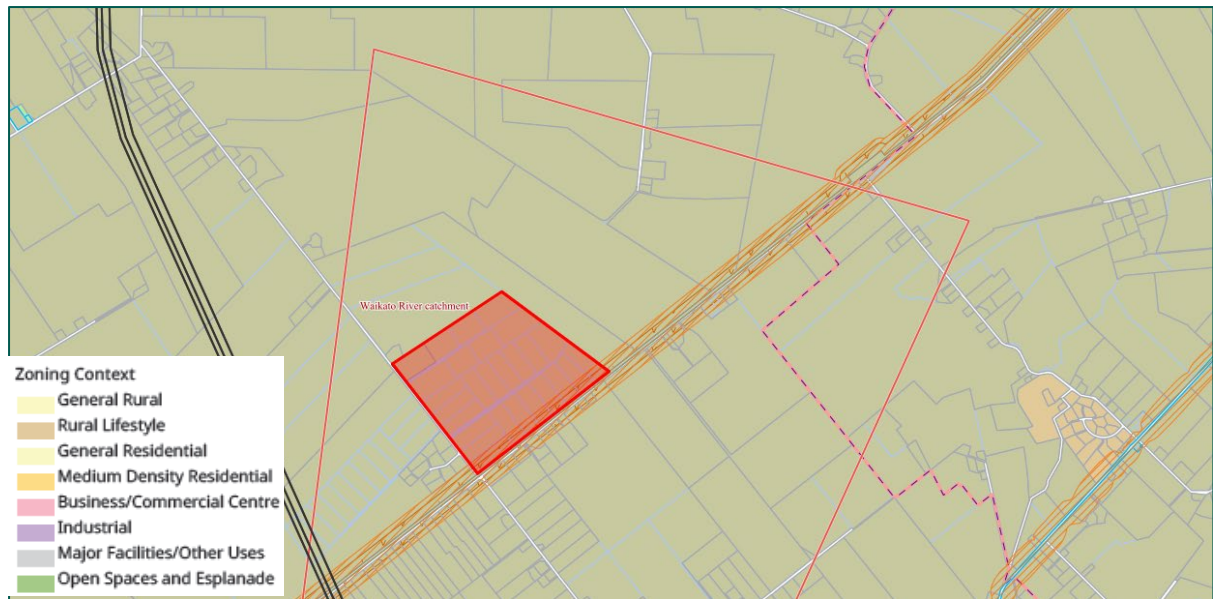


Figure 3 Council GIS - District Plan Zoning and Overlays.

As noted in Section 1.3, while zoned rural, the site comprises 27 long-established titles (since 1977), creating a fragmented landholding pattern and an atypical development baseline that enables multiple dwellings across the site, distinguishing it from a conventional rural property.

1.5 Strategic Context

Awanui Links is strategically located within the Waikato region, centrally located with convenient access to Hamilton, Gordonton, Cambridge and Morrinsville offering development with a range of internal opportunities with connectivity and accessibility to key urban centres and freight corridors.

The site is located outside of Future Proof growth areas.

The site benefits from being located in proximity to major state highways, planned infrastructure upgrades, and emerging public transport services, making it well-positioned to support regional growth and development. State Highway 1B (Telephone Road) forms the western boundary of Awanui Links forming strong connectivity to key urban centres and freight corridors. SH1B forms the critical Hamilton–Gordonton link and ties into SH1, New Zealand’s primary north–south spine, supporting efficient regional movement of people and goods.

This proximity to major state highways positions the site to leverage regional growth, planned infrastructure upgrades, and emerging public transport services.

1.6 Regional Significance of the Project

The Fast-track Approvals Act 2024 has established a framework that differs from the Resource Management Act 1991. We acknowledge that the matters outlined in Sections 22(1)(a) and 22(2)(a) of the Fast Track Approvals Act direct the considerations available to the Minister when assessing a project’s eligibility for referral.

In summary, Awanui Links is a development project that will create economic benefits, provide significant tourism and recreation opportunities in the region, increase the supply of housing, address housing needs particularly catering to a variety of needs and preferences, in terms of supply, type, and price at a scale that

will provide significant regional benefits. The Awanui Links will enable approximately 70 new rural residential homes, a retirement village comprised of 137 independent living units and 3000m² (50 beds) dedicated care facility directly addressing the identified housing shortfalls across the Waikato Region.

A key point of difference for the Awanui Links development is its focus on supporting a multi-generational living lifestyle, an offering that is not widely available across the Waikato. Set within a rural context, the development recognises the strong connection many people have to the land and to the communities in which they were raised. It provides an opportunity for families to remain close to the place they grew up or have worked for generations, rather than being displaced as housing needs change over time.

The project is intentionally designed to enable families to live in close proximity, allowing children to remain near their parents while maintaining independence, and vice versa, and creating a natural support network as families grow and evolve. This is particularly important in rural settings, where generational ties to land, local knowledge, and community relationships play a significant role in identity and wellbeing.

This approach delivers a range of meaningful benefits. It encourages stronger family connections and more frequent interaction across generations, helping to foster a sense of belonging and continuity. For young families, it provides practical day-to-day support such as shared childcare, guidance, and flexibility, reducing stress and enhancing work life balance. For older generations, it offers increased social connection, a greater sense of purpose, and the reassurance of having family close by, which can reduce feelings of isolation while allowing them to remain in a familiar environment.

Ultimately, Awanui Links creates more than just a place to live, it fosters a lifestyle grounded in connection to family, land, and community, delivering enduring social, emotional, and practical wellbeing for residents at every stage of life

We respond to the relevant Section 22(2)(a) considerations for Awanui Links below.

Section 22(2)(a)(i) – has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list:

While the Awanui Links project is not explicitly listed as a priority in a central government, local government, or sector plan or strategy, it fits well with the strategic intent and lens of the urgent need to increase housing supply in the Waikato Region. In this regard, the project aligns with the FTAA (2024) purpose of accelerating projects that deliver significant regional benefits, as set out below.

Section 22(2)(a)(iii) – will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020):

Awanui Links will enable the delivery of approximately 70 new rural residential homes, a retirement village comprised of 137 independent living units and 3000m² (50 beds) dedicated care facility, helping to improve the efficiency of the regional housing market, particularly by enabling older residents to transition into purpose-built accommodation better suited to their needs.

As set out in the Economic Assessment prepared by Insight Economics and included at **Attachment 9**, the proposal will boost housing supply in the Waikato Region, which is important because affordability across the sub-region remains under sustained pressure. For Waikato District specifically, Cotality's most recent affordability report shows that median house values sit around 7–8 times median household income, and servicing a standard mortgage typically requires close to half of gross household income. With affordability

well above long-term norms, and price growth continuing to outpace income growth, the addition of new dwellings in well-located areas is increasingly important for helping to stabilise housing costs over time.

The proposed retirement village at Awanui Links will also help improve the efficiency of the regional housing market by enabling older residents to transition into purpose-built accommodation better suited to their needs. Most future residents are likely to already live within the Waikato region, often in larger standalone homes that no longer match their lifestyle.

By providing an attractive local downsizing option, the proposal will free up existing dwellings for younger households and families, helping to realign housing supply with demand across age groups. In this way, Awanui Links supports greater housing fluidity and choice within the region while allowing older residents to remain connected to their communities.

In addition, Awanui Links will contribute to achieving a well-functioning urban environment. The relevant matters under Policy 1 of the National Policy Statement on Urban Development 2020 (**NPS-UD**) are assessed in Section 4.4 below.

Section 22(2)(a)(iv) – will deliver economic benefits

The Economic Assessment sets out the economic benefits that will be delivered by Awanui Links. In summary these include:

- A one-time boost in GDP of around **\$189 million**;
- The generation of full-time employment for **260 people** over a five-year period. The employment opportunities will be in:
 - **Design and consenting**: providing full time work for 5 people over 5 years, generation approximately **\$2 million** in wages and salaries;
 - **Land development** (excluding the golf course): providing full time work for 130 people over 5 years, generating approximately **\$54 million** in wages and salaries; and
 - **Residential construction**: providing full time work for 130 people over five years, generating approximately **\$54 million** in wages and salaries.
 - **Non-residential construction**: providing full time work for 72 people over five years, generating approximately **\$32 million** in wages and salaries.
 - Development of the golf course construction: providing full time work for 8 people over five years, generating approximately **\$4 million** in wages and salaries.
- The developments non-residential development could sustain full-time employment for 228 people, with annual GDP of over **\$29 million** and more than **\$17 million** paid annually in salaries and wages.
- The proposal provides nine light industrial lots of various sizes and configurations, collectively enabling the development of approximately **12,800 m²** of industrial floorspace, boosting industrial land supply.
- The Awanui Links golf course is clearly positioned toward the higher end of the market and would add depth and variety to the established golf tourism network which supports more than 2,000 jobs nationwide and contributes more than **\$1 billion** per annum to GDP. By pairing a high-quality golf experience with onsite luxury accommodation, wellness facilities, and fine dining, the development strengthens the Waikato's appeal as a multi-course destination for both domestic and visiting golfers.

- The development will respond to the demand for aged-care beds in the Waikato and wider Hamilton sub-region is rising sharply as the population aged 75+ grows. Awanui Links delivers new capacity in a sub-region where demand is rising but investment in new care beds is waning. Adding purpose-built facilities in a high-amenity setting, the project makes a clear and measurable contribution to meeting identified regional need.
- The Awanui Links introduces a mix of tourism, accommodation, wellness, hospitality, and care services, the proposal helps to broaden the structure of the local economy and reduces its dependence on a narrow set of traditional industries. This mix supports a wider range of occupations, diversifies sources of regional income, and enhances overall economic resilience.
- The proposal will also enable the land to be put to its highest and best use, which is a precondition for economic efficiency to hold in the underlying land market.

Section 22(2)(a)(vii) – will support climate change mitigation, including the reduction or removal of greenhouse gas emissions:

Awanui Links aims to minimise greenhouse gas emissions where possible through construction and within the masterplan design.

During construction, greenhouse gas emissions will be reduced through the following measures:

- Minimising the number of truck movements required to manage earthworks material by retaining as much as possible within the site; and
- A staged construction approach that allows for the appropriate management of effects on the environment.

Following construction, the ongoing reduction of greenhouse gas emissions will be supported by:

- Enabling mixed use development, including provision for services and amenities within the new rural residential development to reduce the need for vehicle travel;
- Connectivity to existing centres within the vicinity, including:
 - The Gordonton Village (7-minute drive);
 - The Rotoruna North Centre (11-minute drive);
 - The Hamilton City Centre (20-minute drive); and
 - The Cambridge Town Centre (21-minute drive).
- The development of block and lot layouts which encourage energy efficiencies, including through optimising passive solar gain and natural light.
- The proposal includes establishment of a small solar farm to enhance resilience by off-setting onsite energy demand.

Overall, the Awanui Links proposal will contribute to efforts to mitigate climate change and reduce net emissions of greenhouse gases.

Section 22(2)(a)(x) – is consistent with local or regional planning documents, including spatial strategies:

Overall, Awanui Links is consistent with the relevant local and regional planning documents, as set out below.

Future Proof Strategy

Future Proof Strategy 2024 – 2054 (**Future Proof Strategy**) is a 30-year growth management and implementation plan for the Hamilton, Waipā, Waikato, and Matamata-Piako sub-region. It provides a framework to manage growth in a staged and coordinated manner, addressing complex planning issues, especially cross-boundary matters. The strategy seeks to ensure that housing, employment, and transport networks are well-aligned. It also provides a framework for responding to population growth, climate change, and economic challenges while supporting vibrant, liveable communities.

The key relevant guiding principles of Future Proof Strategy are:

- Establish and maintain linkages between the Future Proof sub-region, the wider Waikato Region, the upper North Island and New Zealand, including planning in an integrated way.
- Ensure the sub-region's towns and villages retain their individual and distinct identities with thriving town centres that support people to live, work, play, invest and visit.
- Shape and guide development towards existing urban settlements and nodes and ensure that rural-residential development occurs in a sustainable way to avoid unnecessary sprawl.
- Improve housing affordability, accessible housing and choice, including papakaainga.
- Restore, enhance and create important blue-green corridors for the protection and improvement of the natural environment.
- Give effect to Te Ture Whaimana o Te Awa o Waikato (Vision and Strategy for the Waikato River) by restoring the health and wellbeing of the Waikato and Waipā rivers.
- Ensure that the values, principles, aspirations, roles and responsibilities and the place of taangata whenua as a partner are reflected and incorporated into strategy governance and implementation.
- Recognise mana whakahaere as the basis for engaging with taangata whenua
- Ensure that development does not adversely affect a rohe environmentally, socially or culturally and that the strategy provides for iwi economic development aspirations.
- Everything we gain, we keep – Ensure that planning for the future use of water maintains or improves water quality, reduces demand and promotes efficient use.

Awanui Links demonstrates strong alignment with these key objectives and principles as follows:

- Awanui Links supports integrated planning by combining tourism, residential, retirement, and light-industrial activities within a single master-planned development. Its connection to SH1B (Telephone Road) and proximity to Hamilton City (10 km) enhance regional accessibility, linking visitors and residents to key transport routes and services.
- The development creates a high-quality destination hub around the 18-hole championship golf course, clubhouse, boutique hotel, fine dining restaurant, and wellness facilities. These complements existing nearby towns by attracting visitors, supporting local employment, and reinforcing a unique identity centered on recreation, wellness, and tourism.
- Through a staged, master-planned approach, the project concentrates development within a defined 123-hectare site rather than allowing ad hoc rural subdivision. Grouping residential (rural-residential lots and retirement village), visitor accommodation, and industrial uses within clear precincts improves infrastructure efficiency and minimizes unnecessary sprawl.

- Awanui Links enhances housing diversity by providing:
 - 137 retirement units (mix of independent living villas and central care facility),
 - 70 rural-residential lots (~3,000 m² each), and
 - visitor accommodation set amongst the fairways and wetlands.

This mix caters to lifestyle, retirement, and tourism-related housing needs, supporting different life stages and preferences.

- The development actively enhances the natural environment through:
 - artificial wetlands integrated with fairways,
 - extensive native planting along site boundaries, and
 - ecological restoration zones throughout the 123-hectare site.
 - These measures improve biodiversity, provide amenity for residents and visitors, and create connected blue-green corridors within the site.
 - Water-sensitive design, including stormwater management integrated with wetlands and water features, supports improved water quality outcomes. By managing runoff from the golf course, villas, and industrial precinct, the project contributes positively to the health of local waterways feeding into the Waikato catchment.
- The scale and variety of the project provide opportunities for collaboration with tangata whenua on cultural landscape design, restoration of native habitats, and inclusion of mātauranga Māori principles in the planning of key public and recreational spaces.
- Awanui Links offers the potential to recognize mana whakahaere by engaging iwi in decision-making for environmental management, infrastructure staging, and land use planning, especially in areas such as wetland creation and ecological restoration.
- The project delivers economic and social benefits through:
 - job creation during construction and operation (hospitality, golf course, industrial precinct),
 - tourism and wellness services (boutique hotel, proshop, driving range, wellness centre), and
 - retirement living supporting Hamilton's growing aging population.
 - The design also creates opportunities to support iwi economic development through partnerships in visitor services, hospitality, and ecological initiatives.
- Awanui Links promotes sustainable water and energy use through:
 - stormwater management integrated with wetlands,
 - on-site renewable energy via a 3,000 m² solar farm near the industrial precinct, and
 - careful staging to align infrastructure delivery (roads, water, and stormwater) with development.

These measures support efficient resource use while maintaining or enhancing water quality.

Te Ture Whaimana o Te Awa o Waikato (Vision & Strategy)

The Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 gives effect to the Deed of Settlement signed by the Crown and Waikato-Tainui on 17 December 2009. The Settlement Act has an

overarching purpose to restore and protect the health and wellbeing of the Waikato River for future generations. Section 9(2) of the Settlement Act confirms that the vision and strategy for Waikato River (Te Ture Whaimana o Te Awa o Waikato) applies to the Waikato River and activities within its catchment affecting the Waikato River.

As identified in the Engineering Memorandum prepared by Maven (refer to **Attachment 13**), the stormwater strategy for the site will incorporate the following key principles to manage stormwater quantity and quality:

- Provision of stormwater quality treatment;
- Limit peak flow from post development to 80% of pre-development levels;
- Secondary flow paths will be designed to dispose of stormwater runoff up to 100-year rainfall events; and
- Provision and active management of stormwater devices to maintain flood carrying capacity.

In addition, all earthworks will be undertaken in accordance with best practice erosion and sediment control measures to protect the health and wellbeing of the Waikato River.

The proposed stormwater strategy for the site will be refined through detailed design, and will be discussed as part of ongoing engagement with Ngāti Haua, Ngāti Wairere, and Waikato Tainui to ensure that Awanui Links supports the restoration and protection of the health and wellbeing of the Waikato River.

Lwi Planning Documents

Engagement correspondence was sent to hapū with resource management interest in the Awanui Links site, and Ngāti Hauā, Ngaati Wairere, and Waikato Tainui have confirmed their interest in being involved in this project on an on-going basis.

Of these hapū, Waikato Tainui has an environmental plan, the Waikato-Tainui Environmental Plan. This planning document is assessed below.

Waikato-Tainui Environmental Plan

The Waikato-Tainui Environmental Plan (**WTPE**) provides a background to, and identifies key, resource-based issues for Waikato-Tainui. The plan sets out Waikato-Tainui's vision statement for environmental and heritage issues and key strategic objectives such as tribal identity and integrity, including "to grow our tribal estate and manage our natural resources." The plan is designed to enhance Waikato-Tainui participation in resource and environmental management.

Section 25 of the WTPE refers to land use planning and development activities and includes objectives and policies which accept that development activities will occur on the basis of achieving positive environmental outcomes and overall environmental enhancement initiatives. In this respect, the WTPE is considered to enable this type of development provided that the potential environmental effects are appropriately managed and the overall environmental management objectives of these documents are achieved.

Section 19.4 of the WTPE outlines water quality objectives to ensure that fresh waters within the rohe of Waikato-Tainui are drinkable, swimmable and fishable in all places. Based upon the methods proposed to address the potential water quality effects of the proposed activities, it is considered that these objectives of the WTPE will be achieved for the proposed development and water quality values of the Waikato River receiving environment will not be compromised.

Regular hui with representatives of Waikato Tainui have been held regarding Awanui Links, and engagement will be ongoing through detailed design and the substantive application. A letter and Memorandum of

Understanding for the Awanui Links site has been developed with hapū, and is included within **Attachment 16 and 17**. Overall, it is considered that Awanui Links development will not be inconsistent with the objectives of WTEP.

Waikato 2070 – Growth & Economic Development Strategy

The Waikato 2070 Growth & Economic Development Strategy (**Waikato 2070**), outlines a 50-year vision for sustainable and strategic growth across the Waikato district. The strategy provides a framework for balancing economic development, community wellbeing, and environmental stewardship to create liveable, thriving, and connected communities. The project is strongly aligned with the focus areas identified under Waikato 2070. It reflects the strategy's core vision of creating liveable, thriving, and connected communities and contributes to all four focus areas outlined in the strategy.

The project is consistent with the relevant focus areas and opportunities identified under Waikato 2070, as identified below.

Growing Our Communities:

- Deliver well-planned and people-friendly communities: The project will enable the delivery of a new masterplanned residential community with approximately 70 new rural residential homes, a retirement village comprised of 137 independent living units and 3000m² (50 beds) dedicated care facility.
- Promote sustainable and cost-effective land-use patterns: The project will support cohesive growth outcomes providing residential and industrial development with on-site amenities supporting the community, including purpose built retirement facility with care centre, café, community facilities, recreational spaces and an 18 hole golf course within the rural setting, maximising the open landscape.
- Infrastructure: As outlined below, Awanui Links will be supported by efficient transport and onsite three waters infrastructure to serve the community now and into the future. The project includes on-site amenities such as passive recreation opportunities within the walking paths and recreational spaces and the golf course.

Build Our Business:

- Support existing businesses to grow and attract new businesses to the district: The project will deliver one-off and ongoing economic benefits, including a range of employment opportunities.
- Help deliver inclusive growth: The project supports inclusive growth by delivering a master-planned, mixed-use development that integrates tourism, residential, retirement, and light-industrial activities, creating diverse employment opportunities, enabling business collaboration, and strengthening connections to regional economic networks.

Embrace Our Identity:

- Promote our culture: Awanui Links promotes local culture through ongoing engagement with Ngāti Hauā, Ngāti Wairere, and Waikato Tainui, incorporating cultural values into the masterplan via planting, artwork, and storytelling elements within shared open spaces.
- Celebrate our history: The development celebrates both cultural and rural history by reflecting the Waikato's agricultural heritage and long-standing rural land use patterns, alongside incorporating cultural narratives and storytelling that recognise the area's tangata whenua and farming legacy.

- Protect our environment: Awanui Links protects and enhances the environment through ecological restoration, native riparian planting, and integrated landscape design, while maintaining rural character by carefully transitioning built form and reinforcing the natural identity of the surrounding landscape.

Empower Our People

- Increase capability and capacity: Awanui Links increases local capability and capacity by establishing a diverse economic base across tourism, hospitality, retirement living, and light industry. This includes facilities such as the boutique hotel, fine dining restaurant, wellness centre, and 18-hole championship golf course, alongside a nine-lot light-industrial precinct (2,300–5,700 m² lots) and a 3,000 m² solar farm. The staged development approach enables infrastructure such as transport access, stormwater systems, and servicing to be delivered in line with demand, supporting business growth, operational efficiency, and long-term capacity within the district.
- Build a resilient local workforce: The project supports a resilient local workforce by creating employment opportunities across multiple sectors, including construction (staged delivery of golf course, retirement village, and infrastructure), healthcare and aged care (137 retirement units with integrated care facility), and hospitality and tourism (clubhouse, proshop, hotel, events and conference facilities). This diversity of roles from entry-level service jobs to skilled positions in healthcare, management, and facility operations provides pathways for workforce development, reduces reliance on a single industry, and strengthens long-term employment stability in the Waikato District and surrounds.

Overall, the Awanui Links is a well-considered and strategically located development that supports the key pillars of Waikato 2070. It provides targeted housing, protects natural and cultural resources, supports economic development, and contributes to the long-term vision of connected and sustainable communities within the Waikato District. This alignment demonstrates the project's strategic merit and consistency with Waikato 2070.

Waikato District Housing Strategy (2024)

The Waikato District Housing Strategy (2024) is a comprehensive 10-year plan to address housing challenges across the Waikato District. The strategy acknowledges that the district is facing unprecedented growth, creating a housing challenge that needs to be addressed quickly. The project demonstrates a strong alignment with the Strategy. Specifically, the project's objectives and planned outcomes directly support the Strategy's vision that "everyone in our community has access to a home that is safe, healthy, and affordable, and is part of a prosperous, resilient, and connected community".

Awanui Links is particularly aligned with the Strategy with respect to increasing housing supply and diversity and contributing to the provision of safe, healthy, and affordable homes to the community particularly providing for elderly. The project helps to address core issues such as housing supply, infrastructure integration, and community connectivity while embodying the Strategy's principles of equity, sustainability, and holistic planning. Overall, this project is well-positioned to contribute meaningfully to the district's housing goals and is well aligned to the Strategy's framework.

Waikato Regional Policy Statement

The Waikato Regional Policy Statement: Te Tauāki Kaupapahere Te-Rohe O Waikato (Waikato RPS) became operative in May 2016. The Waikato RPS provides an overview of the resource management issues in the Waikato region, and the ways in which integrated management of the region's natural and physical resources will be achieved.

Awanui Links is consistent and well-aligned with the following objectives of particular relevance:

- IM-O7 recognises the relationship of tangata whenua with the environment. The project supports this by:
 - Engaging with iwi and hapū with resource management interests in the site to incorporate cultural values throughout the development.
- UFD-O1 seeks that the development of the built environment occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural, and economic outcomes. The project achieves this by:
 - As outlined above, Awanui Links is a masterplanned development that will enable growth that is ordered and co-ordinated;
 - Awanui Links will create social and economic benefits, including through the provision of increased housing supply, care facilities, recreational and community spaces and choice and employment opportunities for the community; and
 - As further assessed in Section 5.0 below, potential environmental effects can be appropriately managed and avoided and/or mitigated.
- UFD-O2 seeks that housing bottom lines as identified under Future Proof can be met. The project supports this by:
 - As outlined above, Awanui Links will contribute to housing supply in both Waikato District and Hamilton City, addressing identified shortfalls for housing across both the short, medium, and long terms and in particular across detached housing typologies.
- ECO-O1 requires a full range of ecosystem types, their extent and the indigenous biodiversity that they support to exist in a healthy and functional state. The project supports this by:
 - As outlined in the Ecological Memorandum and assessed in in Section 5.0 below, the effects of the Awanui Links development on ecological values can be appropriately managed. There will also be opportunity to enhance ecological values through new planting across the site, including in the wetland's restoration.
- EIT-O1 – Energy seeks to ensure that energy use, electricity generation, and transmission systems are managed and developed efficiently and sustainably, meeting growing demand while reducing reliance on fossil fuels, minimizing environmental impacts, and supporting national and regional energy needs, benefits, and security of supply within technical and operational constraints. The project will achieve this by:
 - Awanui Links incorporates a 3,000 m² on-site solar farm to supply electricity directly to the industrial precinct, hospitality facilities, and golf course operations.
 - On-site generation reduces reliance on the wider electricity network, enhancing local energy security and resilience.
 - The solar farm promotes sustainable energy use, minimizing greenhouse gas emissions and transmission losses.
 - By aligning renewable generation with site demand, the project efficiently supports operational needs while meeting broader energy efficiency and sustainability objectives.

- LF-O1 seeks to maintain or enhance the mauri and identified values of freshwater bodies. The project will achieve this by:
 - Providing ecological enhancement in riparian areas through new planting located within and around the site boundaries and restoration of the wetlands; and
 - Ensuring potential effects on freshwater values can be appropriately managed, including through the effects management hierarchy, as further detailed in Section 5.0 below.
- LF-O5 seeks to safeguard the life supporting capacity of soil resources for existing and foreseeable uses and to recognise and protect the value of high class soils from inappropriate subdivision, use or development. The project has some inconsistencies with LF-O5 as the site contains extents of LUC class 2 soils, which is classified as high class soils under the Waikato RPS, and the proposal will result to the loss of this land for future primary production activities. However, as identified above, there are several limitations which affect the overall productive capacity of this land which reduces the productive capacity and versatility of the soils on site.

Overall, it is considered that the project demonstrates broad and substantive alignment with the Waikato RPS. The inconsistency with LF-O5 is considered to be acceptable on balance with consideration to the suit or RPS provisions that the proposal will give effect to, and having regard to the significant regional benefits that will be delivered.

Hamilton & Waikato Tourism - Destination Management Plan 2022

The Destination Management Plan 2022 (DMP) has the goal of ensuring the visitor economy positively contributes to thriving Waikato communities – people, culture and the environment. The DMP 2022 identifies a pathway towards a shared vision by, and for, local communities, iwi, visitors, tourism industry, wider business, and local and central government agencies.

The DMP 2022 outlines several guiding principles which were crafted based on feedback from stakeholders including results from previous consultation undertaken for the development of the Hamilton & Waikato destination brand. These principles are inherent in the Vision, they act as a guide to the formation of and implementation of the DMP for Waikato.

The proposal is able to support and meets these through the following ways

- Celebrate and share local culture: Ongoing engagement with Ngāti Hauā, Ngāti Wairere, and Waikato Tainui embeds cultural values through planting, artwork, and storytelling in open spaces.
- Connect visitors, residents, and industry: Integrated hospitality, wellness, and recreational facilities foster interaction and collaboration across tourism, lifestyle, and business sectors.
- Deliver authentic Waikato experiences: Boutique hotel, golf course, fine dining, and wellness offerings provide memorable, high-quality experiences that reflect Waikato's brand values.
- Embrace guests – Manaakitanga: The project's visitor-focused facilities and services ensure a welcoming, supportive, and engaging experience for all users.
- Regenerative tourism and innovation – Kaitiakitanga: Ecological restoration, wetland creation, and the on-site solar farm demonstrate sustainable, environmentally conscious design, while innovative staging and infrastructure planning enhance operational efficiency and visitor experience.

Overall Awanui Links delivers a culturally rich, environmentally responsible, and visitor-focused destination that celebrates local heritage, fosters connections between residents, businesses, and visitors, and provides

authentic Waikato experiences. Through integrated tourism, hospitality, wellness, and recreational facilities, combined with ecological restoration and on-site renewable energy, the project embodies manaakitanga and kaitiakitanga while incorporating innovative design and infrastructure solutions to support sustainable, high-quality visitor and community experiences.

1.7 Benefit of the Fast-Track Approvals Act (2024) for Awanui Links

As outlined in Section 22(1)(b)(i) and (ii), part of the determination for accepting a referral application includes outlining whether the FTAA (2024) process would facilitate a more efficient and timely delivery of the project;

(b) referring the project to the fast-track approvals process—

- i. would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and*
- ii. is unlikely to materially affect the efficient operation of the fast-track approvals process.*

As outlined in Section 3.0 below, Awanui Links requires a range of resource consents (land use, subdivision, discharge) from Waikato District and Waikato Regional Council's, and a specific approval under the Wildlife Act 1953 for an Authority. The ability to apply for a comprehensive range of consenting requirements within one application, to be considered by one panel, offers significant efficiencies in planning and specialist inputs into managing and navigating the consenting process. The overall intent of the FTAA (2024), which is designed for regionally and nationally significance infrastructure and development projects, supports the scale and significant of Awanui Links. The consolidated timeframes for engagement with interested stakeholders and parties, wider consultation requirements to support substantive applications, and the overall detail required support a more timely and efficient consideration of the project.

Outside of the FTAA (2024) process, it would be anticipated that Awanui Links would not be able to obtain resource consent for subdivision as a Prohibited Activity, and other aspects would be subject to a challenging and complex consenting requirement that would test the current District Plan provisions. Our understanding of the FTAA legislation is to support regionally and nationally significant projects with a single consenting process. This would enable development commencing sooner and the economic, social and wider positive benefits to be realised sooner. The FTAA process is considered the right instrument for this scale of project, and the Awanui Links project is not considered to materially impact on the intent or efficient operation of the FTAA process, more so it would reinforce the value and opportunity that the FTAA (2024) presents for regionally and nationally significant projects.

2.0 Experience

B&A have provided planning expertise on a wide range of developments, under the Resource Management Act 1991, COVID-19 Recovery (Fast-track Consenting) Act 2020, and the recent Fast Track Approvals Act. This includes, but is not limited to: providing planning advice; referral applications; obtaining resource consents under District Plans, Regional Plans, and National Environmental Standards; consultation; and expert witness conferencing.

2.1 Rotokauri Greenway & Minor Arterial Fast-Track Consent

B&A were responsible for the planning inputs for the 'Rotokauri Greenway & Minor Arterial Transport Corridor' resource consent application. On behalf of Hamilton City Council and Hounsell Holdings Limited, B&A obtained a comprehensive suite of resource consents for the construction of the Rotokauri Greenway and Minor Arterial transport corridor, under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Located in Rotokauri, Hamilton, this development involved the construction of a 4.7 kilometre length greenway corridor between two lakes to effectively manage and attenuate stormwater within the catchment, construction of artificial wetlands for stormwater treatment, construction of a 1.3 kilometre Minor Arterial transport corridor, and supporting infrastructure.

This primarily infrastructure project was complex, particularly as it involved works within designation and notice of requirement areas, with several ecological matters (such as black mudfish and natural wetlands) that required offsetting and compensation.

B&A led and supported with the following:

- Coordination of specialist documentation;
- Consultation with stakeholders, including territorial authorities, Mana Whenua, and adjoining landowners;
- Preparation and filing of the referral application;
- Preparation and lodgement of the resource consent application;
- Participation in expert witness conferencing; Obtaining Section 176 Approval; and
- Review of draft conditions.

Resource consent was granted by the panel, subject to conditions of consent, on 17 July 2024.

2.2 Current Projects under Fast-Track Approvals Act

B&A continues to be actively involved in a range of projects progressing under the Fast-Track Approvals Act. Across the wider company, we are working on fast-track projects throughout New Zealand. Within the Waikato, our team is involved in a number of key projects at various stages, including listed projects, referred applications, and others being prepared for referral in collaboration with the Ministry for the Environment (MfE) and the Environmental Protection Authority (EPA).

Our Waikato experience includes preparing referral applications for projects such as Gordonton Country Estate, Brymer, Orchard Grove, Rogerson Block (SL1). We also have had the Ashbourne Fast Track approved. We are also involved in listed projects, including Southern Links 1 and Wallace Road.

Our role spans the full process, from early planning advice and referral applications through to preparing and lodging resource consent applications. We work closely with technical specialists to pull together clear, robust applications, and help guide projects through the fast-track process within tight timeframes.

We regularly engage with councils, government agencies, Mana Whenua, and other stakeholders, and assist with managing key issues such as environmental effects, infrastructure requirements, and planning constraints.

B&A is also involved in expert conferencing, responding to panel queries, and reviewing and refining consent conditions to ensure practical outcomes for our clients.

Through this work, we have developed a strong, practical understanding of how the Fast-Track Approvals process operates, allowing us to efficiently support projects from early stages through to approval.

3.0 Reason for Consent

3.1 Waikato District Plan

Resource consent may be required under the following modules and chapters of the WDP-OP and WODP:

- Subdivision of high class soil (Non-complying Activity (WDP-OP) and Prohibited Activity (WODP));
- Earthworks (Discretionary Activity);
- Three waters infrastructure and servicing (Discretionary Activity);
- New public road, access and traffic generation (Restricted Discretionary Activity);
- Community-scale electricity generation – solar attached to a ground mounted frame (Restricted Discretionary)
- Buildings which do not comply with the building bulk and location controls of the Rural Zone under the WODP and General Rural Zone under the WDP-OP, including height in relation to boundary, building coverage, and setback (Restricted Discretionary Activity);
- Visitor Accommodation (Discretionary);
- Rural Commercial - golf course and ancillary services & wedding venue (Restricted Discretionary Activity);
- Signage (Discretionary Activity);
- Rural Industrial (Restricted Discretionary Activity); and
- Light Industrial (Non-complying Activity).

Detailed design work will confirm the specific rules which apply to the proposed development. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

Overall, the proposal requires resource consent as a **Prohibited Activity** under the WODP and WDP-OP.

3.2 Waikato Regional Plan

Resource consent may be required under the following modules and chapters of the Waikato Regional Plan:

- 3 Water Module
 - 3.3 Water Takes
 - 3.4 Efficient Use of Water
 - 3.5 Discharges
 - 3.6 Damming and Diverting

- 3.7 Wetlands
- 3.8 Drilling
- 5 Land and Soil Module
 - 5.3 Contaminated Land

Detailed design work will confirm the specific rules which apply to the proposed development and the activity status with respect to the above modules and chapters. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

Overall, the resource consents required under the Waikato Regional Plan include:

- Section 9 and section 13 land use consents;
- Section 14 water permit; and
- Section 15 discharge permit.

3.3 National Environmental Standards

3.3.1 National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011

Detailed site investigations will confirm the specific resource consents required under regulations 9-11 of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (**NESCS**). The effects of any proposal for earthworks and subdivision will be assessed as part of a substantive application if successfully referred.

3.3.2 National Environmental Standards for Freshwater 2020

Detailed design work will confirm if work around wetlands require resource consent in accordance with Subpart 1 of the National Environmental Standards for Freshwater 2020 (**'NESFW'**), including Regulations 52, 53, and 54 as well as the overall activity status. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

3.4 Other Approvals

Based on our Ecological Memorandum (**Attachment 8**), we anticipate that a Wildlife Act (1953) Authority would be sought from the Department of Conservation (**DOC**), for the management of native fauna. Further specialist reporting will determine if any other approvals will be sought under WAA. The details of the WAA approval are to be progressed with DOC as part of pre-lodgement consultation of the substantive application and would be outlined in detail as part of a Management Plan, or other type of plan as required, for a substantive application. Should any other WAA be required as part of further specialist reporting, this will be worked through in consultation with DOC.

As per **Attachment 6**, no Archaeological Authority is required under the Heritage New Zealand Pouhere Taonga Act 2014, notwithstanding accidental discovery protocols and ongoing dialogue with HNZPT (where relevant) would continue to occur.

4.0 Statutory Planning Framework

This section is provided in accordance with subclause 2(1)(a)(i) – (iii) of Schedule 5. This requires that applications include an assessment of the activity against the relevant provisions and requirements of the following statutory documents:

- (a) any relevant national policy statements; and
- (b) any relevant national environmental standards; and
- (c) If relevant, the New Zealand Coastal Policy Statement.

4.1 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 ('**NPS-FM**') seeks to manage natural and physical resources to prioritise firstly, the health and well-being of water bodies and freshwater ecosystems, secondly, the health and needs of people, and thirdly the ability to provide for the social, economic, and cultural well-being of people and communities.

It is considered that the project is consistent with the relevant policies of the NPS-FM that relate to land development for the following reasons:

- The development of Awanui Links provides opportunity for ecological restoration of an area that has particularly low ecological value.
- The project seeks to minimise greenhouse gas emissions where possible through this development. The nature of the proposal is to provide infrastructure that will enable efficiencies that will support the reduction of greenhouse gas emissions.
- The project seeks to improve the health and well-being of the Waikato River by treating stormwater prior to discharge through a number of best-practice stormwater management devices.
- Mana whenua have been involved and consulted to this point of the project, which will continue to occur. The project will incorporate cultural values in its design, using Mana Whenua expertise to integrate their values and cultural heritage.
- Maximising the opportunities within the proposed golf course and open space areas for future enhancement, particularly within buffer areas including ecological restoration and enhancement, replanting and offsetting.
- Significant opportunities for restoration and enhancement across the site, including through the maintenance of habitat and vegetation cover where possible.
- Ongoing monitoring will take place to ensure the condition of water bodies and freshwater ecosystems is not degraded.

Based on the assessment above, it is considered that the project is consistent with the NPS-FM.

4.2 National Policy Statement for Highly Productive Land

The National Policy Statement for Highly Productive Land 2022 ('**NPS-HPL**') ensures the availability of New Zealand's most favourable soils for food and fibre production, now and for future generations. It is noted the NPS-HPL recently came into effect on 17 October 2022, and was amended in August 2024.

The *Land Use Capability Classification Assessment (LUC Assessment)* supporting this application identifies the site as LUC 2w2 peat soils. Given this, the site is considered highly productive under the NPS-HPL.

Despite the LUC-2 classification of the site, the LUC Assessment identifies several limitations affecting the overall productive capacity of this land including:

- Soil wetness and drainage constraints across much of the site, reflecting a history of artificial drains, culverts, and a highly modified hydrological network.
- The 11% non-productive land causes internal fragmentation, which severely reduces the cohesion and spatial continuity of the remaining productive area. This isolation limits the land's potential for intensive, single-purpose uses, thereby lowering the overall long-term productive capacity.
- In light of these constraints, the productive capacity and versatility of the soils on site are reduced compared with other HPL in the district. The supporting assessment indicates that a detailed field assessment may identify localised wetter areas with greater soil wetness limitations, which may be classified as LUC 3w1 at property scale and the site may not meet the threshold for ongoing classification as HPL.

Notwithstanding this consideration of the NPS-HPL is required. The NPS-HPL provides for urban development on highly productive land where:

- Urban rezoning or development is needed to provide sufficient development capacity to give effect to the NPS-UD.
- No other reasonably practicable or feasible options exist to provide the required capacity in the same locality and market while achieving a well-functioning urban environment.
- The environmental, social, cultural, and economic benefits of development outweigh the associated costs of losing the HPL.

The NPS-HPL also provides an exemption pathway allowing highly productive land to be subdivided, used or developed for activities not otherwise enabled through the NPS where there are permanent or long term constraints that mean the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years.

The Awanui Links proposal satisfies these policy tests:

- Capacity and demand – Awanui Links can deliver around 70 new rural residential homes, a retirement village comprised of 137 independent living units and 3000m² (50 beds) dedicated care facility, in a timely and integrated manner.
- Location and alternatives – The site is directly adjacent to integrated transport routes with adjacent State Highway 1B (Telephone Road). There are limited alternative options in the same market that would deliver comparable capacity without dispersing development onto other rural/HPL areas. The use of the site for residential uses will also allow for other more productive areas of LUC land to be protected for primary production in the long term.
- Balanced outcomes – The proposal incorporates stormwater treatment ponds, riparian planting, ecological enhancement, and open space. Together with cultural design inputs and proximity to community facilities, these provide environmental, social, cultural, and economic benefits that are assessed to outweigh the long-term costs of developing on land containing HPL.

- Permanent or long term constraints - The site is constrained by widespread soil wetness and drainage issues, fragmented pockets of HPL, and degradation from past farming activities, while its location on Hamilton's urban edge further limits its long-term productive potential.

Accordingly, while Awanui Links development does involve the urbanisation of land currently classified as highly productive, the soils are constrained and the site's urban context limits its long-term productive value. Additionally, given the site's identification in key strategic documents as a future growth area, the land is effectively treated as already allocated for development rather than for the retention of highly productive land.

Based on the assessment above, it is considered that the project is not inconsistent with the NPS-HPL.

4.3 National Policy Statement for Indigenous Biodiversity

The National Policy Statement for Indigenous Biodiversity (**NPS-IB**) ensures that protection, maintenance and restoration of New Zealand's most threatened indigenous species. The NPS-IB came into effect on 4 August 2023.

It is considered that the project is consistent with the relevant objectives and policies of the NPS-IB for the following reasons:

- The proposal commits to avoiding adverse effects where practicable, mitigating through sensitive design and management, and offsetting/compensating where residual adverse effects remain.
- The project seeks to enhance biodiversity across the site through indigenous vegetation planting.
- There are no mapped Significant Natural Areas on the site or adjacent sites.
- Potential low quality wetland areas will be avoided where practicable and where loss is unavoidable, biodiversity offsetting/compensation is proposed.
- Management plans will be prepared through a substantive application to address any potential adverse effects on birds, lizards and bats.
- The proposed restoration and enhancement of wetlands and proposed stormwater treatment wetlands will increase habitat quality and connectivity for indigenous species.
- The project will involve revegetation of riparian areas to enhance the quality of habitat for indigenous fauna throughout the catchment and wider landscape in the medium-long term and improve overall ecological resilience and integrity.
- The incorporation of street trees, greenway planting, and restoration planting in open space and riparian areas, increasing indigenous vegetation and habitat availability.
- The proposal will enhance water quality, support native fauna, and contribute to indigenous biodiversity outcomes beyond the current degraded pastoral baseline.

Based on the assessment above, it is considered that the project is consistent with the NPS-IB.

4.4 National Policy Statement on Urban Development

The National Policy Statement on Urban Development 2020 (**'NPS-UD'**) ensures New Zealand's towns and cities are well-functioning urban environments that meet the changing needs of our diverse communities. It removes overly restrictive barriers to development to allow growth 'up' and 'out' in locations that have

good access to existing services, public transport networks and infrastructure. It is noted that this legislation was amended in accordance with section 77S(1) of the RMA and notified on 11 May 2022.

The NPS-UD enables the development of land and infrastructure for urban land uses while recognising the national significance of well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing (Objective 1 and Policy 1).

It is considered that the project is consistent with the relevant objectives and policies of the NPS-UD and will contribute to a well-functioning urban environment for the following reasons:

- Awanui Links will deliver an integrated development that includes approximately 63 new rural residential homes, a retirement village comprised of 137 independent living units and 3000m² (50 beds) dedicated care facility providing housing types, in locations and at prices in a logical and accessible location.
- The Housing and Business Capacity Assessment identifies that there are capacity shortfalls in the short-term, medium-term and long-term for Hamilton, which are driven by capacity constraints within existing urban areas and because the greenfield areas require significant economic investment in infrastructure to enable capacity to be “reasonably expected to be realised”. The shortfalls are in the order of 4,500 dwellings, so additional capacity is clearly needed. Awanui Links can deliver housing to respond to this shortfall in the short-term in a timely and affordable manner.
- Awanui Links enables people to provide for the social, economic and cultural wellbeing, with the community centre servicing the day-to-day needs of residents, with the site well-located to Hamilton’s central city and Cambridge township.
- The proposal encourages and promotes active transport through a range of walking and cycling options to housing, employment, community services and open space within the development.
- The project takes into consideration climate change, particularly through the stormwater management provided by the stormwater basins and wetland enhancement, and incorporates measures to support the reduction of greenhouse gas emissions (such as mode transport infrastructure).
- The project is well suited to the local area and is strongly aligned with delivering a well-functioning urban environment that reduces climate change through providing infrastructure and services in an integrated manner.
- The *Soil and Land Use Capability Classification Assessment* supporting this application identifies drainage and land stability issues limiting the ability of the land to support primary production activities in areas.
- The *Preliminary Geotechnical Assessment Report* supporting this application confirms the majority of the land is suitable for residential development with no geotechnical constraints identified that would prevent the site from urban development.
- The *Infrastructure Memorandum* supporting this application confirms that the development can be serviced from an infrastructure perspective through on-site solutions should that be required.

Based on the assessment above, it is considered that the project is consistent with the NPS-UD.

4.5 National Policy Statement for Natural Hazards 2025

The National Policy Statement for Natural Hazards 2025 (NPS-NH) applies to flooding, landslip, coastal erosion, coastal inundation, active faults, liquefaction, and tsunami natural hazards. The objective and policies of the NPS-NH seek to manage natural hazard risk associated with subdivision use and development to people and property using a risk-based proportionate approach, with the risk level being assessed using the NPS-NH risk matrix.

The risk associated with subdivision, use, and development assessed as having ‘very high’ natural hazard risk must be avoided and increased significant natural hazard risk on other sites must be avoided or mitigated using an approach that is proportionate to the level of actual risk. Decision-makers are required to apply mitigation measures and use the best information available information, even when information is uncertain or incomplete. The NPS-NH also requires the consideration of the potential impacts of climate change to at least 100 years into the future.

The proposal includes subdivision, use and development on land that is subject to flooding natural hazards and is considered to be consistent with the objective and policies of the NPS-NH for the following reasons:

- A preliminary flood assessment has been carried out by Maven, included in Attachment 4. The post-development model shows that the majority of new lots will be located outside of the 1 per cent floodplain. The preliminary assessment has also identified post-development design parameters for water surface levels and flow rates. The assessment confirms that subject to future development achieving these parameters, there will be no adverse downstream effects from the proposal. It is anticipated that additional investigation and detailed design will be undertaken as part of the substantive application to refine the design solution;
- A preliminary geotechnical assessment has been undertaken by CMW at Attachment 8, indicating that natural hazards on the site are likely to include liquefaction, static settlement, and slope instability. The report identifies the potential for ‘high’ liquefaction hazard within parts of the site and identifies that detailed design will need to include considered measures and other mitigation factors. The report also identifies that the risk of global or large-scale slope instability is ‘unlikely’, and that while settlement may be triggered by future buildings, mitigation measures can be implemented to reduce the potential impacts;
- This site is not considered to be at risk of fault rupture on the basis that there are no mapped faults in the area. The GNS Active Fault Database indicates the nearest active fault is the Kerepehi Fault with is approximately 50km to the east of the site and has a recurrence interval of 2,000 to 3,500 years; and
- The site is located outside of the Coastal Environment and is not considered to be susceptible to coastal erosion, coastal inundation, and tsunami natural hazards.

Based on these preliminary investigations, it is considered that Awanui Links will enable ‘very high’ natural hazard risk to be avoided as part of future subdivision, use, and development. Other levels of risk can be managed proportionately through detailed design measures that will be refined as part of the substantive application.

Based on the assessment above, it is considered that the project is consistent with the NPS-NH.

4.6 National Policy Statement for Infrastructure 2025

The National Policy Statement for Infrastructure 2025 (**NPS-I**) provides national direction under the RMA to guide the efficient development, management, and upgrading of infrastructure across New Zealand. The NPS-I provides for infrastructure. While the Awanui Links application is not for an infrastructure activity, it includes ancillary three waters infrastructure to service development, and it is anticipated that the proposal will not be inconsistent with the provisions of the NPS-I.

4.7 National Environmental Standards for Air Quality

The Resource Management (National Environmental Standards for Air Quality) Regulations 2004 (**'NES-AQ'**) sets standards to guarantee a minimum level of health protection for people living in New Zealand.

No specific consents relating to this standard are required for the Project, although the relevant regulations in the NES-AQ have informed the assessment of construction and operational air quality effects. The potential for effects on air quality in relation to the project relate primarily to dust during the construction phase. Measures are proposed to manage potential effects in response to the air quality objectives and policies.

The management of dust and odour will be addressed in the Construction Management Plan and an Erosion and Sediment Control Plan. As such, ambient air quality will be maintained once Awauni Links is constructed.

4.8 National Environmental Standards for Freshwater

The Resource Management (National Environmental Standard for Freshwater) Regulations 2020 (**'NES-F'**) sets standards to regulate activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the project are provisions which prohibit works in and around natural wetlands. Resource consent will be required under the NES-F as works are proposed in and around natural inland wetlands.

Potential natural inland wetlands have been identified on the site with the extent to be determined by further ecological investigation, however this may relate to vegetation clearance and earthworks within or around natural inland wetlands, drainage of natural inland wetlands, and loss of natural inland wetlands. Offsetting and compensation, if appropriate, can be assessed as part of a further Ecological Assessment that would be included as part of a substantive application.

4.9 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (**'NESCS'**) sets a nationally consistent set of planning controls and soil contaminant values.

SLR Consulting (SLR) have undertaken a combined Preliminary Site Investigation (**'PSI'**) for the site, as appended to the referral application (**Attachment 15**).

The PSI has identified that the site is the location of a number of verified potentially contaminating 'HAIL' activities associated with its historic use. A number of unverified but suspected activities that may cause localised contaminated soil and water risks have also been identified.

Consequently, the NESCS applies to the site and any subdivision, change in land use or soil disturbance at the site will trigger the requirement of the NESCS for further investigations, soil and water contact and disturbance risk mitigation, and consent.

Therefore, a Controlled Activity consent under Regulation 9(3) of the NES:CS is required to undertake the change of land use and for future soil disturbance as part of future developments. On this basis, any requirements of the NES:CS can be addressed as part of an application post-referral and potential risks to human health can be appropriately managed and mitigated.

4.10 New Zealand Coastal Policy Statement

The New Zealand Coastal Policy Statement ('NZCPS') sets out a number of objectives and policies for achieving the purpose of the RMA in relation to the coastal environment of New Zealand. As the site is not located within close vicinity to the coastal environment, it is considered that the NZCPS is not relevant to the proposed activity.

5.0 Assessment of Effects

The proposal will not generate significant adverse environmental effects, as any adverse effects on the environment will be appropriately avoided, remedied or mitigated to be minor or less than minor in nature. The key potential adverse effects are addressed in general below and should be reviewed in conjunction with the supporting technical expert memorandums accompanying this application.

5.1 Construction

Earthworks

Earthworks will be carried out in accordance with best practice appropriate erosion and sediment control measures to avoid and mitigate adverse environmental effects. All sediment and erosion control measures will be designed in accordance with the Waikato Regional Council 'Sedimentation and Erosion Control Guideline'. All earthworks will also be managed in accordance with an Erosion and Sediment Control Plan ('ESCP') and any adverse dust effects can be appropriately managed with standard conditions of consent.

Construction Noise & Vibration

During construction, noise and vibration is anticipated to occur as a result of the works proposed to be carried out on the site. Construction will be managed in accordance with the NZS 6803:1999 Acoustics – Construction Noise and German Standard DIN 4150-3:1999 Structural vibration – Effects of vibration on structures.

Construction noise and vibration will be managed in accordance with a Construction Noise and Vibration Management Plan ('CNVMP'). The CNVMP will outline measures, such as restrictions on days and hours of noisy works, consultation with neighbours and use of quieter machinery (among others) to ensure that potential construction noise effects of the project are appropriately managed.

Contaminated Land

The PSI (**Attachment 15**) has identified that the site is the location of a number of verified potentially contaminating 'HAIL' activities associated with its historic use. A number of unverified but suspected activities that may cause localised contaminated soil and water risks have also been identified.

Therefore, a Controlled Activity consent under Regulation 9(3) of the NES:CS is required to undertake the change of land use and for future soil disturbance as part of future developments. On this basis, any requirements of the NES:CS can be addressed as part of an application post-referral and potential risks to human health can be appropriately managed and mitigated.

The Waikato Regional Council has assessed that there is a high probability of acid sulphate soils in this area. Acid sulphates can be found in waterlogged soils and can cause damage to water ways and infrastructure when exposed to oxygen through excavation or drainage. From recent experience in the Waikato region organic/peat soils present a potential higher risk of having acid sulphate conditions. Inorganic soils are typically low risk. Testing and sampling will be required during the geotechnical investigation to assess the level of risk for the site. If mitigation is required, this can typically be done through the addition of Ag-Lime.

Stability

A Preliminary Geotechnical Desktop Report has been prepared by CMW Geosciences. With respect to site stability, CMW identify that earthworks and foundation design solutions can be adequately addressed through further investigations at the time of detailed engineering design. Based on these findings, it is considered that the site can accommodate the proposed development and that any land stability effects can be avoided and mitigated.

5.2 Archaeology

An Archaeology Assessment has been prepared by RedOx. There are no existing records of archaeological or other historic heritage sites being recorded within Awanui Links, with the closest recorded sites being located 5km west of the site.

Fieldwork and onsite surveying was completed by RedOx to identify the potential for any unrecorded archaeology site. The results of the survey did not identify any presence of archaeological soils. On the basis that there are no recorded archaeological sites or areas of identified unrecorded archaeology, RedOX consider that there are no archaeological values associated with the site. The potential for unrecorded archaeology is very low to nil and an Authority from Heritage New Zealand Pouhere Taonga is not required. The proposal would apply accidental discovery protocol conditions as part of the substantive application.

On this basis, it is considered that the proposed development will not adversely affect archaeology values.

5.3 Infrastructure & Servicing

The preliminary infrastructure and servicing strategy for Awanui Links is summarised below and is further detailed in the Engineering Memorandum prepared by Maven and included at **Attachment 13**.

- **Stormwater:** A new private stormwater network will be created to service the site and control stormwater flow, and will include stormwater ponds designed to mitigate flows up to the 100-year ARI event. The ponds will also provide stormwater water quality treatment, and will be designed in accordance with the Waikato Regional Infrastructure Technical Specifications (RITS) and other relevant technical standards. In addition, a series of wetland ponds, as shown in the Masterplan, will flow will discharge into adjacent existing stormwater drains and/or channels that form part of the Waikato Regional Komakorau drainage network at a controlled rate which reflects existing discharges rates. Further Groundwater Recharge methods will also be incorporated into the detail design to maintain local and wider hydrology. Rainwater Harvesting and Reuse will also be explored as additional stormwater mitigation through the substantive process and to fed into Water Supply.

- **Water Supply:** Maven has investigated options for potable water supply, including on lot rainwater harvesting and reuse tanks, sized for both potable and firefighting supply for industrial and rural residential allotments. The retirement village area and the golf/events centre are likely to be serviced via a combination of supply from multiple private bores and rainwater harvesting and reuse tanks. The golf/events centre will include a centralised water treatment plant is also proposed as part of Event Centre area to ensure that any water sourced from the bore for use as potable water will be treated to the required drinking water standards. The potential effects associated with utilising on-site water supply have been assessed by WGA in the Hydrogeological Assessment. Their initial assessment confirms that new water supply bores on site can provide drinking water without adversely affecting other bores within the surrounding area. Detailed investigations and water quality testing will be undertaken to support any new bores required for water supply.
- **Wastewater:** Similar to water supply, Maven has investigated options for reticulated wastewater management as well as a decentralised system and confirm that both options are feasible. Connection into the reticulated network will be supported by a combination of new pump stations and gravity networks, dependent on the catchment location and site topography. Should capacity constraints within the reticulated network be confirmed through detailed design, a decentralised treatment plant will be proposed to provide for treatment and disposal within the site.

Overall, the Engineering Memorandum confirms that the site can be adequately serviced. Therefore, it is considered that there will not be any significant adverse effects in relation to infrastructure and servicing.

5.4 Groundwater

A hydrogeological assessment has been prepared by WGA to assess potential effects on groundwater resulting from earthworks and on-site infrastructure, as well as potential new water supply bores. WGA's preliminary assessment confirms that those activities which have the potential to interact with groundwater are well understood and can be appropriately managed through detailed design to avoid adverse drawdown, mounding, and discharge effects. Based on regional hydrogeological data, site specific assessment, and data from comparable nearby developments, WGA conclude that there is no indication of significant constraints that would prevent the development from proceeding.

5.5 Transportation

A Transportation Memorandum has been prepared by Commute and is included as **Attachment 7**. In summary, their assessment identifies:

- Three separate access points along Telephone Road, which are considered appropriate to provide access subject to further detailed design work and the following conditions:
 - Construction vehicles are to enter the site from the north via Puketaha Road;
 - Following each stage of development, an updated ITA shall be provided to Waikato District Council that provides an assessment of the performance of the Holland Road/Telephone Road intersection and an updated safety assessment of the level crossing.
 - All heavy vehicles accessing the retirement village, the care centre, and the golf course including waste vehicles and regular deliveries are required to enter the site from the north, via Puketaha Road

- Any private bus operators are required to enter the site from the north via Puketaha Road.
- Each use will have its own dedicated parking provision, with the quantity per activity to be determined as part of the ITA prepared for the substantive application. The site is considered large enough that sufficient space will be available to meet the expected demands on site, resulting in no parking effects on the surrounding road network.
- The existing level crossing located at the intersection Telephone Road and Holland Road was subject to significant upgrading to improve safety in July 2025. The additional movements across the level crossing are not expected to present safety concerns. Ongoing monitoring is recommended as part of the staged delivery of the proposal.
- There are limited land use activities within walking or cycling distances from the proposed site. As such no provisions for active modes are proposed on Telephone Road. There is however a comprehensive network internal to the site, with access between the activities available.
- The methodology for undertaking further assessment to inform the ITA and substantive application, as set out at Section 5 of the Transportation Memorandum.

Overall, Commute conclude that there are no significant transport effects that would preclude the development from occurring. On this basis, it is considered that any transport effects can be appropriately avoided and mitigated.

5.6 Character & Amenity

An Urban Design Memorandum has been prepared by Barker & Associates (**Attachment 4**) and includes an assessment of the urban design aspects of the proposal and conceptual masterplan. The Memorandum includes identification of potential effects associated with the proposed street network and block structure, density, built form, and future building typologies, the neighbourhood centre, and the provision of open space. The findings of the Urban Design Memorandum are summarised below:

- The Awanui Links masterplan creates a connected, easy-to-navigate street network linking the proposed land uses to Telephone Road / State Highway 1B. The network is structured around two proposed local roads (~20 m) and supported by Private Access / Right of Ways (~10 m) serving the rural-residential, retirement village, golf course, and industrial areas. A number of design measures have been adopted to support a well-functioning urban environment, including a clear street hierarchy, with local roads forming primary east-west spines and a series of Right of Ways providing fine-grained access between land uses, to support legibility and connectivity, dedicated access to light industrial lots accommodating heavy vehicle movements whilst minimising interaction with resident and visitor traffic.
- Co-location of rural-residential lots, a retirement village, golf course, guest accommodation and light industrial area create a balanced land-use mix, supporting access to amenities while providing opportunities for passive surveillance across the site.
- The provision of golf fairways, wetlands and layered boundary planting creates separation between the proposed built form from SH1B and adjoining farmland. This allows Awanui Links to read as a landscaped extension of the rural environment and manages potential reverse-sensitivity effects between urban and rural activities.

- The proposed 3000m² rural-residential lots provide for a wide range of building forms, setbacks, and on-site landscaping, helping to avoid uniformity and introduce visual variation while maintain and open character consistent with the rural setting.
- The provision of active recreation opportunities and open outlook strengthens overall site amenity by supporting healthy, everyday activity and access to attractive open spaces. Outlook to landscape and recreation areas provide visual relief and wellbeing, contributing to a stronger visual character.
- The retirement village introduces age-friendly housing and everyday activity into the masterplan, and by clustering the café and care facilities along the local street it can support passive surveillance to the public realm. The larger built form associated with the retirement village is setback from the external boundaries to limit potential visual effects.
- Transitions at rural interfaces are managed by graduating development intensity toward the site edges through lower-density rural-residential lots, generous setbacks, and landscape/shelter planting. This approach maintains a more open rural outlook, reduces the perceived scale of built form and helps new development sit comfortably within the existing rural context. It also provides a clear, legible edge condition and an appropriate buffer to support rural amenity.
- Stormwater ponds are formed with gentle batters and safety shelves, with integrated paths and specimen trees so that stormwater infrastructure reads as parkland rather than inactive spaces, and double as dispersed landscape features within the golf course providing amenity and outlook for future residents and users.
- The proposed golf course planting increases overall vegetation coverage, enhances habitat and biodiversity, provides shade for players, and establishes green buffers that separate the golf course from guest accommodation and retirement village units to mitigate potential conflicts between on-site uses.

Overall, the Memorandum finds that Awanui Links delivers a coherent street and open space framework, and a mix of land-uses to create diverse activity while managing reverse sensitivity along key transport routes and providing an appropriate visual transition at rural edges.

The masterplan integrates a blue-green network of wetlands, drains and landscape corridors that both manage stormwater while providing future amenity. Subject to further technical inputs, the development of more detailed building plans, comprehensive design controls and/or guidelines, the proposal will support a well-functioning urban environment consistent with contemporary New Zealand urban design practice and the FTAA purpose.

5.7 Landscape & Visual

A Landscape and Visual Effects Memorandum has been prepared by Barker & Associates (**Attachment 5**), identifying the potential effects of the development on character and visual amenity and potential measures which can be implemented to appropriately address the resulting change in the landscape and to the urban form.

These identified measures include:

- A connected open space network (greenways, wetland margins, and shared path corridors) should be designed to preserve “breathing space” within the masterplan, sustaining aspects of openness and providing a perceptual counterpoint to built intensity;

- Setbacks, interface open spaces, and layered structure planting should be used to reduce visual dominance and to manage the relationship with adjoining rural and rural-residential properties. Building height and massing controls at the edges, coupled with planting that echoes the rhythm and scale of existing shelterbelts, can create a graduated transition that maintains legibility of the rural edge.
- Planting palettes and spatial patterns should be locally grounded and consistent with the surrounding rural landscape character, so that the developed landscape reads as an evolution of existing attributes rather than an unrelated visual language.
- Generous street trees, coherent avenue planting, and well-designed berms and swales should be used to establish an attractive and legible movement network. Reserves, wetland margins, and shared walking/cycling routes should be integrated into a cohesive system that is continuous, accessible, and clearly structured.
- Reflecting mana whenua values in public realm design.

Overall, the Landscape Memorandum confirms that the Awanui Links masterplan will result in a clear and enduring change in landscape character, transitioning a modified rural, pastoral setting into an intensively programmed mixed-use environment. With robust implementation of sensitive perimeter design, a strong blue-green framework, cultural landscape integration, and a high-quality public realm, the proposal has the potential to establish a coherent and well-integrated development that is responsive to its receiving environment and maintains continuity of landscape identity through an explicit relationship between people, place, and the living landscape.

5.8 Noise

An Acoustic Assessment has been prepared by Styles Group (**Attachment 11**) which identifies the likely noise effects resulting from the proposal and the potential mechanisms available to manage those effects. In summary, their assessment finds:

- Construction noise and vibration can generally be undertaken in compliance with the relevant noise and vibration limits. Exceedances are likely to be temporary and intermittent, and can be appropriately managed through the preparation of a Construction Noise and Vibration Management Plan.
- No challenges have been identified in terms of industrial activities operating in a way that ensures compliance with the relevant district plan standards at any notional boundary (within and adjacent to the Site).
- With respect to the Solar Farm Styles is confident that all mechanical solar plants can be selected and located in a way that ensures plant noise will readily complaint and unintrusive outside the Site.
- With respect to the golf course and facility the following was assessed:
 - The location of the driving range ensures adequate separation that will ensure noise will be reasonable for proximate receivers adjacent to the site.
 - The noise levels from day-to-day operations associated with hospitality and accommodation activities are expected to be generally inaudible outside the Site. Noise from vehicles entering or exiting the Site from SH1B is not expected to be intrusive to the closest receivers on Amber Lane given the low vehicle volumes.

- The noise from residential activity on the rural-residential lots is expected to be controlled by intermittent vehicle movements and noise from typical household activities. The overall character, timing and duration of noise generated by residential activity is expected to be consistent with the timing, character and level of noise from the rural lifestyle lots that are directly adjacent to the Site.
- The Masterplan shows that no sensitive land uses are proposed within 100m of the ECMTR. There are no sensitive land uses adjacent to SH1B. We have not identified any concerns relating to noise or vibration from road and rail. The proposed masterplan does not trigger any mitigation requirement for road noise or rail noise or vibration.

Styles Group finds that the proposal can achieve a high level of compatibility with the level of acoustic amenity provided for and anticipated under the relevant district plan for the Waikato District. It is therefore considered that any potential noise effects associated with the proposal can be appropriately managed through design details.

5.9 Cultural

The project is not located on land returned under a Treaty Settlement, nor does it fall within a Treaty Settlement Statutory Acknowledgement area.

Extensive engagement has been undertaken with Mana Whenua throughout the life of the project and will continue as it progresses. As detailed in **Attachment 16 and 17**, a letter of support confirm that Mana Whenua have been actively involved and consulted to date. Through continued, meaningful engagement, it is anticipated that any potential adverse cultural effects can be appropriately avoided, remedied, or mitigated.

Mitigation measures include the implementation of appropriate cultural protocols (such as karakia, cultural monitors, and site-specific procedures), Mana Whenua involvement in the design process, and the incorporation of indigenous planting. These measures collectively ensure that cultural values are embedded within the project's design and delivery.

While there remains a very low risk of encountering archaeological material during construction, this will be effectively managed through an established Accidental Discovery Protocol. The project also represents an opportunity to reflect and celebrate the area's cultural heritage through design. This will be achieved by incorporating Mana Whenua expertise to express cultural narratives and values which is currently not visible in the landscape through built form, public spaces, artworks, indigenous flora, and materials that signify the re-establishment of Mana Whenua presence and aspirations.

The Applicant and Ngāti Wairere have entered into a Memorandum of Understanding (MOU) for the site. The MOU provides a record of intent and understanding, confirming Ngāti Haua's and Ngāti Wairere's support in principle for the project, subject to the completion of a Cultural Values Assessment (CVA). The MOU also formalises the commitment to prepare a CVA to inform and support the substantive application.

5.10 Ecology

An Ecological Memorandum has been prepared by EcoLogical Solutions (**Attachment 8**), which identifies the existing terrestrial and freshwater ecological features across the site, and provides an overview of their value.

The Awanui Links site was farmed at the time of the survey, which was reflected in the near absence of indigenous vegetation present. The site comprised mostly exotic pasture with mature exotic paddock trees, shelterbelts, hedgerows and ornamental plantings around buildings and ponds. Two small (collectively = 4,400 m²) fragmented areas of putative wetland within paddocks that could meet the RMA definition of a 'wetland' and the NPS-FM (2020) definition of a 'natural inland wetland'.

Ecological Solutions has identified the potential effects of the proposed development on ecological values, as well as potential approaches to ensure these effects can be appropriately managed. Overall, this includes:

- Removal of poor quality, predominantly exotic, terrestrial vegetation (e.g., pasture, mature exotic trees) and habitat, and the potential for effects of this loss of habitat on terrestrial fauna that may be using it (e.g., birds, lizards, bats).
- Unavoidable loss and/or effects on low-quality wetlands.
- Removal of artificial watercourses that may provide habitat for native fish.
- Removal of artificial ponds that may provide habitat for native fish.
- Potential short-term adverse effects on water quality due to sediment mobilisation and/or contaminant discharges during earthworks.
- Potential stormwater discharges that affect downstream hydrology and water quality.
- Potential wastewater discharges that affect downstream water quality.

In addition, the project presents an opportunity to enhance ecological values through planting of ecologically appropriate plantings in riparian areas and new indigenous vegetation, including in the wetlands, open spaces, and as street trees.

The assessment concludes that:

- Wildlife Act Authorisation will be required for the salvage and relocation of indigenous lizards during vegetation clearance, as well as incidental injury or death.
- Any unavoidable loss of wetlands and black mudfish habitat (if present) would require biodiversity offsetting/compensation to address residual effects and there are areas available within the site where wetlands could be created to address this (e.g., in areas where stormwater treatment wetlands are proposed or along the golf course).
- A detailed ecological assessment and ecological management plan as well as an offset/ compensation plan (if required) will be included in the resource consent application should the application be accepted as a referred project.

On this basis, it is considered that actual and potential effects of the proposal on ecological values can be appropriately managed, including in accordance with the effects management hierarchy where this is applicable.

5.11 Soils

As detailed in the LUC Classification Assessment (**Attachment 10**) and outlined above, the site is underlain by class 2W2 soils, as shown in **Figure 4** below.



Figure 4: Distribution of dominant soils, LUC classes, and LUC units (source: Landsystems).

The class 2 soils within the site meet the definition of highly productive land under the NPS-HPL, however the 2w2 (peat) land is not considered ‘high class soil’ under the WDP-OP and nor is it ‘high quality soil’ under the WODP.

Analysis of aerial imagery shows that approximately 11% of the Site comprises non-productive land, including existing houses and curtilage, farm races, a pond, shelterbelts, and drains. Accounting for these areas, the remaining productive land is estimated at 103.52 ha, or 89% of the Site.

A detailed field assessment may identify localised wetter areas with greater soil wetness limitations, which may be classified as LUC 3w1 at property scale. The Site’s productive capacity is constrained by inherent soil wetness, peat soil subsidence, and severe trafficability limitations when wet. These constraints render the land incompatible with water-sensitive, deep-rooting horticultural crops (e.g., kiwifruit). The Site’s best land use is pastoral use and limited seasonal arable cropping, which requires careful, long-term drainage management.

The 11% non-productive land causes internal fragmentation, which severely reduces the cohesion and spatial continuity of the remaining productive area. This isolation limits the land's potential for intensive, single-purpose uses, thereby lowering the overall long-term productive capacity. An on-site soil and LUC assessment is recommended for the Substantive Application under the Fast-track Approvals Act (‘FTAA’)

Having regard to the above and the actual extent of high-class soil present, it is considered that the potential adverse effects of urban development and the loss of highly productive and high class/high quality soil are outweighed by the benefit of providing needed housing supply and variety.

5.12 Effects on Greenhouse Gas Emissions

Awanui Links aims to minimise greenhouse gas emissions where possible through construction and within the Masterplan design.

During construction, greenhouse gas emissions will be reduced through the following measures:

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- Minimising the number of truck movements required to manage earthworks material by retaining as much as possible within the site; and
- A staged construction approach that allows for the appropriate management of effects on the environment.

Following construction, the ongoing reduction of greenhouse gas emissions will be supported by:

- Multi-modal transport corridors within the development which prioritise pedestrians and cyclists and encourages active modes of transport;
- Enabling co-location of land uses, including provision for services and amenities within the new development to reduce the need for vehicle travel;
- Connectivity to existing centres within the vicinity, including:
 - The Gordonton Village (7-minute drive);
 - The Rotoruna North Centre (11-minute drive);
 - The Hamilton City Centre (20-minute drive); and
 - The Cambridge Town Centre (21-minute drive).
- The lot layouts which encourage energy efficiencies, including through optimising passive solar gain and natural light.

Overall, the Awanui Links proposal will contribute to efforts to mitigate climate change and reduce net emissions of greenhouse gases.

5.13 Positive Effects

Awanui Links will deliver a number of positive effects, including but not limited to:

- Increasing housing supply within a location that will benefit people and communities in both the Waikato District and Hamilton City. In particular, Awanui Links includes provision for detached housing, which accounts for approximately 50 per cent of deficit identified in Hamilton City. In the Waikato, the shortfalls are identified across all dwelling typologies;
- The co-location of rural-residential lots, a retirement village, golf course, guest accommodation and light industrial area create a balanced land-use mix that supports activity, with residents, visitors and workers present at different times of day;
- The retirement village will provide older residents with a secure, socially connected, and supportive environment, enhancing quality of life while contributing to more efficient delivery of local health and support services;
- The provision of a modern, integrated care facility at Awanui Links delivers a purpose-built facility in a high-amenity setting making a clear and measurable contribution to meeting identified regional;
- The golf course will contribute not only a distinctive recreation offering within the Waikato, but also support greater regional connectivity, longer visitor stays, and complementary tourism activity across the central North Island;
- Enhancement of ecological values through new planting within riparian areas, the proposed wetlands, open spaces, and within the road corridor;

- Generation of a wide range of economic benefits, including providing new employment opportunities and GDP value add, as identified in Section 1.5 above;
- Provision of new open spaces, passive recreation and golf course, which will provide for active and passive recreation needs of future residents;
- Provision of co-located land use activities, including new commercial and recreational uses provide employment opportunities within a walkable catchment to the proposed residential lots; and
- With respect to the above, the creation of a well-functioning urban environment that will contribute to the social, economic, and cultural wellbeing of people and communities.
- Awanui Links offers a unique, rural-based multi-generational living model that enables families to remain connected to their land, support one another across generations, and achieve stronger social, emotional, and community wellbeing.

5.14 Mitigation

This memorandum and supporting information from technical experts identify a range of measures to address potential adverse effects of the proposal, and ensure that those effects are avoided, remedied, or mitigated.

This includes the application of standard and well-established mitigation measures as well as targeted responses to manage the effects of this proposal. These can be addressed through design, conditions of consent, and monitoring through a substantive application.

6.0 Engagement and Consultation

The applicant has undertaken engagement and consultation with key stakeholders and iwi and hapū, as set out in the Consultation Tracker included as **Attachment 16**. A copy of meetings and minutes in the form of Consultation evidence can be viewed in **Attachment 17**.

Key outcomes and discussions are also set out below.

- **Iwi and hapū:** Ongoing engagement and consultation has been undertaken with Ngāti Hauā, Ngāti Wairere and Waikato-Tainui. A series of hui have been held to discuss the project and the referral application, complemented by a site walkover on 5 March 2026 to review the masterplan and overall proposal. Following these discussions, a letter of support for the referral application has been received, and a MOU has been signed between the applicant and the hapū to formalise the preparation of a CVA. Refer to **Attachment 16 and 17** for supporting documentation.
- **Future Proof Committee** – On 18 November 2025, a meeting was held online with the Future Proof Partners (including Hamilton City Council, Waikato District Council, Waikato Regional Council and NZTA) to discuss the Awanui Links consultation pack and masterplan. Refer to **Attachment 16 and 17** for pre-lodgement consultation undertaken with the Future Proof Partners.
- **Waikato District Council** – Several meetings have been held with Waikato District Council (WDC) in relation to Awanui Links, as well as ongoing communication via email. The Awanui Links consultation pack was shared with WDC. Following this WDC has supplied a statement of facts for the project which has been taken into account in refining the masterplan and wider proposal. Key discussion points included:

- Transport assessments completed and implications of the development on the recent railway crossing upgrades.
- Rural zoning and highly productive land, including the unique fragmented baseline for the site.
- Three waters infrastructure.
- Ecological value of the site being limited – poor.

Waikato District Council is a Future Proof Partner and a record of consultation is included at **Attachment 16 and 17**.

- **Department of Conservation (DoC)** – Pre-lodgement consultation initiated via formal application to DoC email at Fasttrackapplicationenquires@doc.govt.nz. Subsequently, DoC were provided a copy of the consultation pack and supporting specialist ecological report. The applicant is engaging with DoC on the Wildlife Act Authority as part of this consultation and will continue to meet further with the DoC project lead as we move towards a substantive application. Evidence of pre-lodgement consultation is outlined in **Attachment 16 and 17**.
- **Heritage New Zealand Pouhere Taonga (HNZPT)** – Pre-lodgement consultation initiated via formal email. A desktop archaeology assessment for the site was prepared by RedOx, and is included as Attachment 11. The Archaeology assessment confirms that there are no archaeological sites or areas of unrecorded archaeology with the Awanui Links site. Accordingly, an Authority from HNZPT is not recommended. HNZPT has confirmed their support for the recommendations contained in the RedOx Archaeology Assessment, and their confirmation is included in **Attachment 16 and 17**.
- **Ministry for the Environment (MfE)** – Pre-lodgement consultation initiated via formal email to MfE at AdminAgencyFTAA@mfe.govt.nz. The email provided an overarching description of the proposal and a copy of the masterplan. MfE replied via email confirming the consultation request with a Section 11 letter attached outlining the national direction under the RMA that requires consideration and the relevant matters have been considered and assess above in Section 4. Evidence of pre-lodgement consultation is outlined in **Attachment 16 and 17**.
- **Ministry of Education (MoE)** – Pre-lodgement consultation initiated via formal email. Subsequently, we had a meeting with key MoE representatives to present the consultation pack and discuss any feedback or concerns specifically from a schooling perspective as well as the broader proposal. Following the meeting, the consultation pack and meeting minutes were circulated to MoE. Evidence of the pre-lodgement consultation is outlined in **Attachment 16 and 17**.
- **KiwiRail** - Pre-lodgement consultation initiated via formal email. Subsequently, we had a meeting with KiwiRail to present the consultation pack and discuss any feedback or concerns specifically relating to the railway line and level crossing bordering the site. Following the meeting, the consultation pack and meeting minutes were circulated to KiwiRail. Evidence of the pre-lodgement consultation is outlined in **Attachment 16 and 17**.
- **New Zealand Transport Agency (NZTA)** - Pre-lodgement consultation initiated via formal email. Subsequently, we had a meeting with KiwiRail to present the consultation pack and discuss any feedback or concerns specifically relating to the State Highway. Following the meeting, the consultation pack and meeting minutes were circulated to NZTA. Evidence of the pre-lodgement consultation is outlined in **Attachment 16 and 17**.

7.0 Conclusion

Having undertaken a high-level planning assessment, it is considered that there are no planning related reasons why Awanui Links could not proceed under the Fast-Track Approvals Act 2024. Through strong design and technical input, Awanui Links can achieve an urban environment that positively impact future residents and the wider Waikato and Hamilton City community, without having adverse environmental effects.

Overall, the project represents a regionally significant, master-planned destination that integrates tourism, recreation, lifestyle living, retirement accommodation, and essential rural services into a single, cohesive development. It will deliver substantial economic, social and wellbeing benefits for the local community and wider region by meeting identified housing and retirement demand, enhancing access to key services, and establishing a high-quality recreation and tourism offering that both serves local needs and attracts visitors to the region to access its facilities and recreation opportunities.

It is acknowledged that a full and comprehensive Assessment of Effects will be undertaken as part of the resource consent application, however at this stage, no more than minor adverse effects have been identified that preclude the development from occurring.