

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

Project name	SL1 Houchens Development
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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Hamilton City Council		
*First name	Juliana		
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2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

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

Managers signoff



Dr Juliana Reu Junqueira

Date 20 April 2026

20 April 2026

Ilana Miller
General Manager, Delivery and Operations
Minister for Infrastructure
C/o Ministry for the Environment
contact@fasttrack.govt.nz

Dear Ilana

FAST-TRACK PROPOSAL: SL1 Houchens Development - Reference FTAA-2602-1174

Thank you for the invitation to provide written comments on the SL1 Houchens Development referral application under the Fast-track Approvals Act 2024.

The comments below summaries key matters already recorded in Hamilton City Council's Statement of Facts for SL1 Houchens Developments and highlight the risks and dependencies that in our view, should shape both any referral decision and the information requirements for a substantive application.

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

Kind Regards,



Dr Juliana Reu Junqueira
Director Urban and Spatial Planning Unit | Strategy, Growth & Planning Group
Hamilton City Council
s 9(2)(a)

Cc: Blair Bowcott
General Manager – Strategy, Growth & Planning Group
Hamilton City Council
s 9(2)(a)

Hamilton City Council Comments:

We record the following in relation to the referral application for the subject area:

1. SL1 Houchens is within the SL1 Growth Cell, which has been identified for future urban growth, and is an area subject to a Memorandum of Understanding between Waipā District Council and HCC for the potential transfer to Hamilton City Council (HCC) and urbanisation.
2. Any successfully referred SL1 Houchens application will need to be consistent with the concept plan that has been developed for the wider SL1 Growth cell. This is to ensure that all Fast-track substantive applications and any other development within the SL1 Growth Cell is integrated and coordinated. This will result in a well-functioning urban environment, which includes planning for parks, social infrastructure and local amenities.
3. New strategic infrastructure is required to enable the full build-out of the SL1 Houchens Development, including the Hamilton Southern Links expressway and sustainable water supply and wastewater services.
4. Given the site's proximity to the Hamilton City boundary and the existing Hamilton water and wastewater networks, the developer is investigating options to service the development via HCC/IAWAI infrastructure.
5. Technical assessments are underway to evaluate water and wastewater servicing options for the SL1 Houchens Development using existing and/or planned HCC/IAWAI systems. These assessments are being undertaken collaboratively by HCC and IAWAI in good faith. However, IAWAI currently has no jurisdiction, nor the necessary commercial agreements, with Waikato Waters Ltd or Waipā District Council to provide services outside the Hamilton City and Waikato District Council areas.
6. Until an appropriate commercial agreement is established between IAWAI and Waikato Waters Ltd, IAWAI is unable to provide water and wastewater services to the development. Discussions between IAWAI and Waikato Waters Ltd are ongoing; however, the outcome and timeframe for reaching an agreement remain uncertain.
7. The existing HCC/IAWAI water and wastewater networks directly adjacent to the development area are subject to capacity constraints. As a result, interim servicing solutions to enable initial or staged development connections to the HCC/IAWAI networks cannot be guaranteed. Any potential connection to the existing or future HCC/IAWAI networks will be dependent on appropriate commercial agreements between IAWAI and Waikato Waters Ltd.
8. Other infrastructure connections will be subject to approvals from HCC, Waipā District Council, NZ Transport Agency (NZTA),
9. Conditions of consent should be proposed by the applicant and attached to any substantive application to ensure that each stage of development can be appropriately serviced without compromising acceptable levels of service across the wider networks.
10. Given that the full build out of the SL1 Houchens Development is reliant upon key water, wastewater and transportation infrastructure being operational (potentially 10

years away, or commitment uncertain), the Fast-track approvals pathway may not be the most appropriate avenue for obtaining approval.

11. The identified infrastructure constraints and the corresponding delays to full-build out, must be considered when considering the economic benefits of the SL1 Houchens Development. The analysis should also include an assessment of the capacity that could be enabled by the other Fast-track areas within SL1 and realised once the strategic infrastructure is in place.

Background

SL1 Houchens (the site) is located immediately outside the Hamilton City boundary, within the Waipā District, and forms parts of the Southern Links 1 (SL1) Growth Cell. The SL1 Growth Cell is bounded by Glenview and Deanwell neighbourhoods to the north and east, and the Hamilton Southern Links expressway to the west.

There are already two significant urban development projects proposed within the SL1 growth cell that have been referred for consideration under the Fast Track Approvals Act. These projects are the SL1 Mexted development and SL1 North / Industrial development (contained within the one Fast-track substantive application) and the SL1 Rogerson proposal. Collectively, these developments will add approximately 2500 residential lots and 100 hectares of land for industrial development in this part of Hamilton.

The full build-out of these Fast-track proposals is heavily reliant upon the completion of the Hamilton Southern Links expressway. Most SL1 Fast-track areas are also reliant upon the Southern Wastewater Treatment Plant and key reticulated water upgrades. These infrastructure projects are significant, with uncertain start and/or completion dates and unconfirmed funding. It is possible that smaller portions of these Fast-track developments could proceed through various interim infrastructure solutions, until such time as the strategic infrastructure has been constructed and is operational to provide a long-term solution to allow full realisation of the proposed projects.

HCC and its Future Proof Partners (Waipā District Council, Waikato Regional Council, and New Zealand Transport Agency) have been working proactively with Fast-track applicants to investigate interim solutions (where available) that may overcome these constraints and potentially enable some development to be initiated. In some cases, interim solutions could involve sharing the available reserve capacity between Fast-track areas, which only hastens the depletion of the reserve capacity.

Local Government boundary change processes

HCC and Waipā District Council have a Strategic Boundary Agreement framework for the SL1 Growth Cell, which includes the subject Fast-track site. The agreement provides for the future transfer of the SL1 Growth Cell from Waipā District Council to HCC.

If the project is referred, a boundary adjustment may be required to support integrated servicing and funding outcomes. Giving effect to any Fast-track consent is complicated by

differing water entity jurisdictional boundaries. IAWAI, the joint waters authority controlled by HCC and Waikato District Council currently only has jurisdiction within the boundaries of the parent territorial authorities. As the subject application is currently located within the Waipā District Council area, Waikato Waters- the joint CCO of Hauraki, Matamata-Piako, Ōtorohanga, South Waikato, Taupō, Waipā and Waitomo District Councils- is, in jurisdictional terms, the relevant water entity.

However, given the proximity of Hamilton City's reticulated water and wastewater networks to the site, and the strong likelihood that the development could only be feasibly serviced by those networks, IAWAI has been closely involved in discussions with the applicant.

This engagement has taken place in good faith, in the absence of formal commercial arrangements and in anticipation of a potential future boundary adjustment. A similar approach has been adopted for the other two listed and referred applications within the SL1 Growth Cell.

The Local Government Act boundary transfer processes are exhaustive, long and poorly aligned with the pace of Fast-track consenting and the development unlocked. Discussions between SL1 Fast-track applicants, Waikato Waters and IAWAI are ongoing to put in place sufficient formal agreements that allow continued engagement between applicants and IAWAI that cover the period up to formal transfer and extension of IAWAI jurisdiction.

These are likely to be resolved soon, but are an extra issue containing added uncertainty that must be navigated by all parties specific to those applications on Hamilton's southern periphery.

A boundary change may not be a direct or immediate consequence of any Fast-track consent being granted. However, without early clarity on boundary alignment and infrastructure servicing arrangements, there is a high risk of misaligned development stages and sub-optimal integration with HCC's infrastructure networks and long-term investment programme. This includes recouping costs of servicing through rates, and the complexity of other cost recovery methods such as development contributions outside its jurisdictional boundary.

The practical complexities of developing immediately adjacent to HCC's boundary, combined with differing landowner expectations across Council jurisdictions, will require careful management to ensure well-coordinated, efficient and integrated urban design outcomes.

Integrated approach

An integrated and coordinated planning approach is expected for development within the SL1 Growth Cell (Appendix 1), ensuring that key considerations such as land use, transport, three waters, open space, urban form and urban design, are informed by a holistic understanding of the entire growth area, and its interface with future development in the Peacocke's area, rather than individual Fast-track application areas in isolation. Integrated

planning for infrastructure with responsible agencies including relevant councils, IAWAI, Waikato Waters Ltd and NZTA is also extremely important.

The SL1 Houchens Development proposal needs to respond to the concept plan that has been developed for the SL1 Growth Cell in partnership with HCC and its Future Proof Partners (Waipā District Council, Waikato Regional Council, and New Zealand Transport Agency Waka Kotahi), which includes key elements such as indicative road connections, stormwater management areas and commercial areas, that collectively support high-quality and well-functioning urban outcomes.

A key element of the concept plan is the indicative spine road from Houchens Road to Collins Road that would pass through the SL1 Houchens Development. HCC expect the spine road to be formed to local collector standard and allow for traffic and alternative modes to transit between the Stage 1A and 7 areas of the SL1 Houchens Development. HCC requires that the spine road is formed to an HCC local collector standard with 18m legal carriageway width (2 x 3.0m minimum traffic lanes).

It is noted that the spine road passes through land to the north of the Houchens land, which does not form part of a referred Fast-track proposal. Accordingly, the applicant will need to engage with the adjacent landowner to confirm and secure the point at which the spine road crosses the Fast-track boundary, and to ensure appropriate coordination and integrated planning across the wider SL1 Growth Cell. This will be pursued with the applicant if the referral application is accepted.

Another important consideration is that the proposal is not detrimental to Hamilton's urban form. The development needs to be read as a seamless extension of the city through close knitting into the existing urban fabric by permeable road and open space networks. At exterior boundaries potential interface friction with surrounding rural uses and the Southern Links motorway is avoided by sufficient buffering.

Peacocke Development

The site adjoins the Peacocke Growth Cell to the east, located within Hamilton City. This area has been the focus of significant planning and investment by HCC on trunk infrastructure. Development uptake within the Peacocke Growth cell has been slower than expected and for that reason some interim water and wastewater capacity may be available to initiate some limited development within the subject development. It is stressed that this would be a temporary solution and full realisation of development within SL1 Houchens will require independent water and wastewater solutions. It is of utmost importance to HCC that the SL1 Fast-track referred, listed and referral applications do not compromise the significant development and investment at Peacocke. Although interim capacity may be made available, any allocation is likely to be conservative to ensure that development within Peacocke is not compromised. With significant investment, it is important that unplanned proposed developments like SL1 Houchens do not impact the growth of planned areas.

This also extends to ensuring the interface between Peacocke and SL1 Houchens is properly managed, and will be a focus of engagement for any substantive application by HCC.

Further, planning and infrastructure developed within Peacocke has not anticipated any development within the subject site, and the cost of changes required within Peacocke to give effect to development within the subject site will need to be assigned to the applicant.

Transportation / Network Connections

General

Traffic modelling will be essential to assess capacity, safety, and integration with existing roads to ensure that the transport network supports a well-functioning urban environment. This modelling will also be required to identify necessary upgrades to the existing network and to determine the infrastructure needed to support any proposed staging of development.

The development proposal must include a road hierarchy, safe intersections, realistic public transport assumptions, routing and infrastructure, and walking and cycling infrastructure. All modes must connect to existing urban areas and future urban areas within the SL1 growth cell and adjacent Peacocke Precinct.

Road layout, design and land use patterns must support walkable neighbourhood outcomes and the delivery of planned rapid transit initiatives on Ohaupo Road / State Highway 3. Any assumptions made on trip mode share (i.e. active modes and public transport uptake), must be supported in the substantive subdivision and land use proposals.

Hamilton Southern Links expressway

The SL1 Houchens development is heavily reliant on the Hamilton Southern Links expressway becoming operational. While the Hamilton Southern Links corridor has been designated and the NZTA Board has endorsed the Investment Case, the funding, timing, and sequencing of the expressway remain uncertain. This uncertainty has the potential to affect the practicability and timing of delivering of the later stages of the proposed development.

Delivery of the SL1 Houchens development is closely linked to the operation of the Hamilton Southern Links expressway. The substantive application will also need to identify the upgrades required to the surrounding public road network, both with or without the Hamilton Southern Links expressway in place, including the implications of partial staging should only sections of the expressway become operational).

Any proposed upgrades to the public road network would be subject to HCC, Waipā District Council and NZTA approval.

Ohaupo Road / State Highway 3 (SH3) intersection

Most of the SL1 Houchens Development would be accessed from Houchens Road, which is a local road that currently serves a relatively small number of residential properties. The Houchens Road / SH3 intersection would be the primary road access to the SL1 Houchens Development area if the Hamilton Southern Links expressway does not proceed or is not operational with an interchange at Houchens Road.

The Houchens Road / SH3 intersection has existing safety and performance constraints that could be worsened if effects arising from SL1 Houchens are not properly mitigated. This may include restricting the scale or intensity of development that can proceed without upgrading the intersection, with any staging undertaken in close coordination with NZTA to achieve appropriate network outcomes.

At this stage, traffic generated by the initial stage of the SL1 Houchens development has the potential to result in significant adverse effects on the safe and efficient performance of the intersection if the Hamilton Southern Links expressway is not operational.

Public Transport

Existing local and regional public transport services in Hamilton currently operate in proximity to the Southern Links growth area, but coverage within and along the SL1 Houchens development boundary is limited. Following the Public Transport Pathways report developed in 2024, Waikato Regional Council currently plans to transition to a more direct and frequent bus service from 2028 into the next decade. State highway 3 (Ohaupo road) will remain a key bus transit corridor but coverage may reduce in surrounding residential suburbs which will directly affect the public transport connection of SL1 Houchens.

Three Water Servicing

Water supply

There is currently no reticulated water supply servicing the SL1 Houchens Development area.

There is a strong preference for all stages of the SL1 Houchens development to connect to the HCC/IAWAI public reticulated water and wastewater services. At-source or decentralised servicing solutions are not supported, and such infrastructure would not be suitable for vesting into public networks.

The strategic water supply infrastructure required to service the full development of the SL1 Houchens area, includes establishment of a new water supply demand management zone comprising:

- a dedicated reservoir filling main connected to the existing bulk network,
- a dedicated water reservoir, and

- associated trunk and local distribution networks within the demand management area.

There is no funding in place to establish this strategic infrastructure which applicants will need to contribute to (secured through a separate Private Developer Agreement).

There is currently no capacity in the existing Hamilton City reticulated water network to serve the entire SL1 Houchens Development area.

An interim water supply solution would be needed to serve the initial phases of the SL1 Houchens Development. Subject to modelling and the appropriate commercial agreements being reached between IAWAI and Waikato Waters Ltd, a portion of the SL1 Houchens area may be able to be serviced by existing infrastructure with local and trunk network upgrades. It is unclear how much of the SL1 Houchens development could be served without the strategic infrastructure requirements in place.

Water demand planning for both the long-term and interim scenarios is predicated on the Houchens (and greater SL1) area attaining separate water abstraction consent through Waikato Regional Council. This assumes that the necessary agreements between IAWAI and Waikato Waters Ltd can be reached and that water would be supplied from the HCC/IAWAI water system. The requirement for gaining an additional water abstraction consent to provide for this area is because the existing HCC abstraction consent caters for only organic growth within HCC and not the Fast-track areas).

SL1 Houchens developers have applied to Waikato Regional Council for the water abstraction consent and are working through this process and including HCC/IAWAI as an interested party.

Wastewater

HCC have a strong preference for all stages of the SL1 Houchens development to be connected to the HCC/IAWAI reticulated wastewater services. At-source or decentralised systems are not supported and would not be accepted for vesting.

There is no capacity in the existing network to serve the full build-out of SL1 Houchens, meaning an interim wastewater solution would be needed to serve initial phases of the development.

The preferred long-term solution to serve growth in SL1 and Peacocke areas, and northern Waipā, is to establish a Southern Wastewater Treatment Plant. IAWAI's draft Water Services Strategy that is out for public consultation states that this project would be constructed in stages during the 2026-2036 period. Funding has only been secured for the land and design process. The Southern Wastewater Treatment Plant is therefore more likely to be operational in the later part of the period 2026-2036 at the earliest.

Subject to modelling, IAWAI verification and the appropriate commercial agreements being reached between IAWAI and Waikato Waters Ltd, it is possible that wastewater from initial stages of the SL1 Houchens Development could be pumped to the existing Peacocke Wastewater Pumping Station as a connection point to the HCC/IAWAI system, as an interim servicing option. The Peacocke Wastewater Pumping Station has limited reserve capacity so allocation to Fast-track applicants would need to be coordinated, and would be deadlined, which may change depending on uptake within the Peacocke cell and reallocation back to the development it was originally intended for.

This may force early decision making on the Southern Wastewater Treatment Plant to ensure that infrastructure and treatment is in place for the SL1 Houchens site when there is reallocation of Wastewater capacity back to Peacocke development.

Stormwater

The SL1 Houchens development site is located within the Mangakootukutuku catchment, which ultimately discharges to the Waikato River. HCC have developed an Integrated Catchment Management Plan (ICMP), which along with Te Ture Whaimana, District & Regional Plans and relevant infrastructure standards form the framework for development of appropriate stormwater infrastructure. It is expected that:

- a. The application should demonstrate alignment with the objectives of Te Ture Whaimana, and the Waikato-Tainui Environmental Plan.
- b. All proposed stormwater infrastructure should be developed in accordance with the Mangakootukutuku ICMP, HCC and Waipā Operative District Plans, Waikato Regional Plan, and the Waikato Regional Infrastructure Technical Specification and properly recognised within the SL1 Growth Cell Concept Plan with which any substantive application must align.
- c. All potential impacts to areas both downstream and upstream of the proposed development site are fully quantified, and that proposed infrastructure adequately identified impacts.
- d. Stormwater infrastructure solutions are integrated with ecological & biodiversity outcomes with the intent of achieving restoration of the Waikato River & it's tributaries.

There will also need to be a discussion with NZTA how stormwater will be managed off the State Highway, to the south.

Geotechnical

There are significant deposits of peat and acid sulphate soils at various depths within this Fast-track application area. These soils need to be assessed by a geologist in the substantive application, with appropriate measures applied where these soils are to be modified or built

on. Adequate mitigation through pre-loading must be demonstrated as achievable within reasonable timeframes.

Land Use and Urban Design

The proposed application concept plan provided adopts a mixed block orientation and while some are aligned north–south this has not been consistently applied. It would be better for the road layout to follow the topography which is somewhat varied in this part of the SL1 Growth Cell.

The lot sizes and length of lot frontages proposed are too small and give rise to concerns for fitting accesses, infrastructure, street trees and lighting as well as ensuring pedestrians and cyclists can travel safely without vehicles backing out of accessways. Rear vehicle access is required for lots fronting arterial transport corridors. HCC staff seek that transport corridors should align with district plan width standards to ensure all modes of travel can occur safely. This will also assist in the integration of the proposed development with existing Hamilton suburbs.

An Urban Design Assessment should be submitted with the substantive application to explain the design basis, including street and lot layout. It is preferable that the design basis reflect Hamilton City District Plan provisions and any strategies or policies on the HCC website. A Development Framework including Design Guidelines is required to guide the development of the created lots until such time as an operative urban zoning applies. Bespoke development controls must be limited to achieve a specified outcome.

Potential reverse sensitivity effects related to establishing industrial and residential development in proximity to one another will need to be considered, and it may be appropriate to separate these land uses with a landscaped buffer or an area of open space. The design should embrace any local features (e.g. topographical, stormwater reserves, wetlands).

Industrial areas should be developed to accommodate a diverse range of industrial activities. Commercial activities within industrial areas should be limited in scale and should be restricted to those activities that support the day-to-day needs of workers.

Any neighbourhood centres within residential or industrial areas should be located to ensure optimum amenity and access and will be designed and size to only service the immediate neighbourhood and avoid attracting traffic from outside the proposal area.

Ecology

Ecological effects and management need to be demonstrated in any substantive application. The ecological report acknowledges potential adverse effects to birds, lizards, bats, fish, wetlands and water quality. Any effects should be avoided or mitigated - reflected in the masterplan as well as appropriate assessments against National Policy Statements and legislation. The Houchens area is located closely to the Peacocke development area and

long-tailed bat activity has been previously recorded within the site during radio tracking in 2019. There is also significant bat activity, west of the site in Resthills park. Significant steps will need to be undertaken to protect Hamilton's long-tailed bat population, and it is noted compensation against any identified effects is the least desirable outcome. HCC's preferred approach is for sensitive areas to be appropriately planned for and protected in the first instance.

Wetlands in the area have been highly modified and drained over the years; therefore, the gully system to the northern end of the site will need to be protected and ecological affects appropriately assessed. An assessment of environmental effects has not been provided, and the ecological assessment does not provide significant justification for the loss of wetlands and biodiversity. It is expected that an assessment against the National Policy Statement for Indigenous Biodiversity be undertaken. The gully contains natural watercourses, and investigation needs to be undertaken regarding riparian requirements and esplanade provisions.

Parks, Open Space and Social Infrastructure

Parks and open spaces will need to be vested at no cost to HCC and in accordance with the HCC Open Space Provision Policy (2018).

The open space included in the proposal is only focused on stormwater devices, no public parks are provided. The HCC Nature in the City strategy contains a goal "We achieve 10% native vegetation cover in Kirikiriroa/Hamilton by 2050", street trees, parks and tree canopy coverage on lots will need to be incorporated into the Houchens design in order to achieve this.

HCC staff have been in contact with the SL1 agents of all referred Fast-track areas to discuss the importance and need for social infrastructure in all Fast-track application areas. Social Infrastructure such as sports facilities, community hubs and libraries are essential to amenity and proper functioning of significant large new urban areas. We note that the Houchens development does not include any proposal to provide local social infrastructure within the Fast-track application area. An eventual proposed additional 2,500 residential lots will generate a significant increase in population triggering the need for new social infrastructure, and will be pursued through discussions on any substantive application, and could include allocated land in the area's master plan and/or financial contributions.

Conditions strategy: information and drafting expectations (if referred)

1. Taking the above into account, HCC supports using a standardised conditions strategy across Fast-track Approvals Act projects, with scope for project specific tailoring where required. For SL1 Houchens we recommend any substantive application is required to:
 - fit within the SL1 Growth Cell, with SL1 Houchen stages within it;
 - reference the masterplan in conditions as an approved plan for the applicant's land, and

- treat third party land at a non-binding level.
- 2. Submit a Development Framework that:
 - Lists enabled activities and exclusions;
 - Sets development controls / bulk and location controls largely drawn from the operative provisions);
 - Includes design principles / criteria for attached typologies, and
- 3. Use staging with infrastructure triggers (including open space / social infrastructure) tied to s224(c) release for each stage, keep funding and responsibilities to commercial agreements (PDA) separate from conditions.
- 4. Include stormwater performance requirements consistent with the catchment approach, including primary conveyance channels, appropriate buffers and overland flow protection. Evidence should be provided that Waikato Regional Council drainage level of service is maintained.
- 5. Separate consent types (land use, subdivision, temporary works) and apply “fall away” conditions for bulk earthworks and temporary activities.

Section 22 of the Fast-track Approvals Act

Section 22 of the Fast-track Approvals Act lists the criteria for accepting a referral application. Section 22(1)(b) specifically asks the Minister to consider whether the Fast-track approvals process:

- a) Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and
- b) Is unlikely to materially affect the efficient operation of the Fast-track approvals process.

HCC questions the use of the Fast-track process for this proposal, given that the project relies heavily on infrastructure that will not be operational for potentially another 10 years such as the Southern Wastewater Treatment Plant, or on other infrastructure like the Southern Links Road that is as yet unconfirmed. As a result, any consent granted under the Fast-track Approvals Act will not be able to be fully given effect to and completed development not fully realised for some time.

Further, under the compressed time frames of the Fast-track Approvals Act, cumulative effects triggered by several Fast-track applications in one area may not be able to adequately identify and be mitigated through conditions, potentially resulting in externalities borne by rate-and taxpayers.

The Future Development Strategy 2024 for the sub-region, has already plan enabled 30 years of residential land supply including nearby Peacocke that has had significant funding invested.

With the significant number of Fast-track applications already approved for referral around the city along with planned and consented greenfield developments, namely Peacocke, Rotokauri and Greenhill still in the construction phases, HCC questions whether acceptance

of an additional referral application at Houchens is the most appropriate use of finite council resourcing and infrastructure.

In the context of the duration of realisation of certain required infrastructure, unconfirmed status of other essential infrastructure and misaligned timing of boundary change processes that enable full formal extension of IAWAI jurisdiction, that conventional planning processes may be more appropriate in this instance. No real acceleration of development at the site will be achieved through the Fast-track process while the strategic infrastructure issues remain unresolved or non-operational. Further the more extensive duration of normal planning processes will enable all matters and cumulative effects to be properly identified, mitigations put in place and incorporated into consents granted, ensuring externalities are avoided.

Summary

- The appropriate waters entity jurisdiction for the subject area remains uncertain, creating practical challenges for the initiation of development.
- A boundary change process may be required to enable extension of jurisdiction; however, the timing of such processes are misaligned with pace of development anticipated by any Fast-track consent, therefore interim measures may have to be implemented.
- The development must be seamlessly integrated with Hamilton's existing urban form and implemented in a manner consistent with the SL1 Growth Cell concept plan.
- The proposal has the potential to adversely affect the timing and uptake of development in the adjoining Peacocke Growth Cell, with implications for the effective utilisation of significant HCC investment in that area.
- Transport planning must incorporate existing HCC standards and public transport and must fully anticipate possible construction of the Hamilton Southern Links.
- Some initial water and wastewater capacity may be available from Peacocke as an interim measure; however, this would be temporary and contingent, and separate long-term servicing solutions would be required to enable full realisation of the proposal.
- The cost of strategic upgrades to waters and transport infrastructure triggered by the proposal will be appropriately assigned to the applicant.
- Further work will be required to finalise the proposed urban layout.
- The applicant will be encouraged to appropriately respond to the presence of bats at the site and the preference will be in the first instance for avoidance, and only as a last resort compensation.
- The incorporation of social infrastructure will be pursued through engagement on any substantive application, as it is essential to the proper functioning of these significant new residential areas.
- The applicant will be expected to submit a development framework that aligns with HCC's Operative District Plan (or successor).
- Given the extended lead times and uncertainty around key enabling infrastructure (e.g. Hamilton Southern Links), the Fast-track approvals process may not represent the most suitable pathway at this stage. A conventional planning process may better

enable comprehensive effects assessment and integration of necessary mitigation measures.

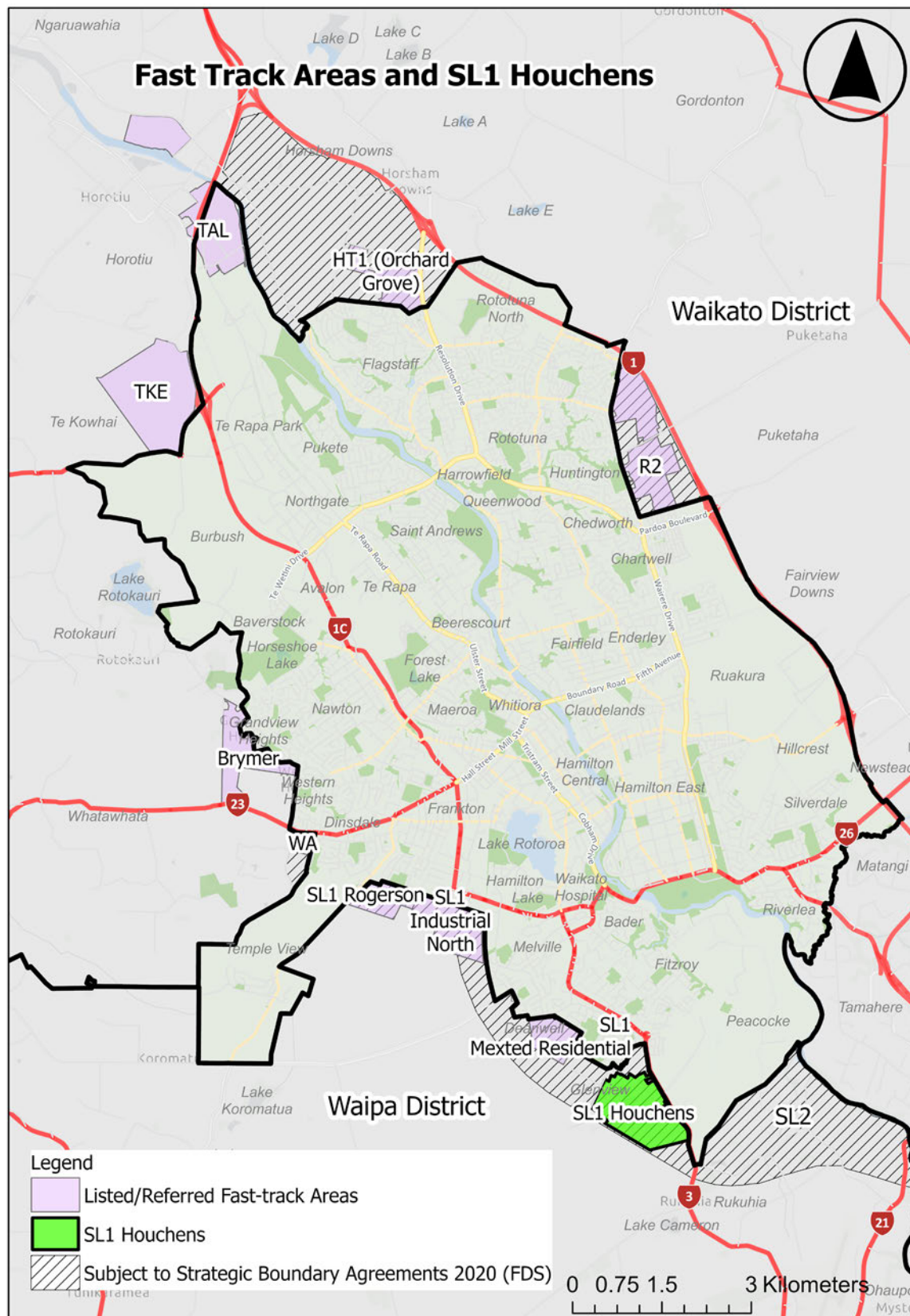
Thank you,

A handwritten signature in blue ink, appearing to read 'JLRJ-r', located below the 'Thank you,' text.

Dr Juliana Reu Junqueira

Director Urban and Spatial Planning Unit | Strategy, Growth & Planning Group
Hamilton City Council

Appendix 1: Map of Fast-track Areas and Areas seeking referral



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

Project name	SL1 Houchens Development
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All sections of this form with an asterisk (*) must be completed.

1. Contact Details

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

Organisation name (if relevant)	Waikato Regional Council (WRC)		
*First name	Paul		
*Last name	Bowman		
Postal address	Private Bag 3038 Waikato Mail Centre Hamilton 3240		
*Contact phone number	s 9(2)(a)	Alternative	s 9(2)(a)
*Email	s 9(2)(a)		

2. Please provide your comments on this application

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

The following comments:

- Respond to the matters under section 17(3) of the Act that a local authority must provide comment on (**PART A**); and
- Provide comment on some additional considerations relevant to the proposal (**PART B**).

PART A

SECTION 17(3)

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

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

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

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

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

PART B

SECTION 22

Waikato Regional Council provides the following comments which are aimed at informing of certain matters relevant to the Ministers considerations under section 22 of the FTAA.

WRC considers that the only criteria of potential relevance to the project are whether it:

(iii) will contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020)

(iv) will deliver significant economic benefits

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

WRC consider that the SL1 Houchens project in its entirety has the potential for significant regional benefits, however three fast track proposals in the SL1 area are currently disjointed and only form part of the SL1 area. For the benefits to be released, it would require future planned strategic infrastructure to be integrated with the wider SL1 area which includes the listed SL1 Houchens project and referred Rogerson Block¹ application together with the proposed staging of the Hamilton Southern Links Road of National Significance² to prevent ad hoc piecemeal development.

Parts of this development (e.g. a potential new interchange with Houchens Road) will be dependent upon completion of Hamilton Southern Links and major upgrades to the local transport network. It is WRC staff's understanding that these projects are not expected to

be delivered in the next ten years which would likely impact the delivery of the Houchens project. Given the longer-term infrastructure and funding issues associated with other as yet applied for Fast Track projects, the timing of this substantive project requires careful planning and oversight to be effective and ensure the desired outcomes are met.

In addition, the following key considerations are relevant and important:

- The proposal will increase the supply of industrial and residential/ retirement land within the Future Proof Strategy sub-region (consisting of Waikato District, Hamilton City, Waipā District and Matamata-Piako District). The most recent Future Development Strategy (FDS) 2024 for the sub-region, has already identified plan-enabled 30 year residential land supply excluding this proposal.
- The Future Proof Housing and Business Development Capacity Assessments (HBA) identifies sufficient plan-enabled residential capacity across all time periods (1-30 years) but notes a short-medium term (1-10 years) insufficiency in serviced residential land and reasonably expected to be realised. However, that issue equally applies to this site (i.e. it is not serviced by infrastructure). There are also other significant housing areas proposed as part of other fast-track projects listed in Schedule 2 of the Act and applications that have been referred under the Act around the periphery of Hamilton (please refer to Attachment A which shows the current and proposed fast-track projects around Hamilton). Collectively, listed and referred projects (excluding the 70ha land for residential/retirement village purposes in this project) propose a total of approximately 324.5ha of additional residential land, enough for an additional 8000 plus houses. Given that Future Proof has already provided sufficient housing supply for 30 plus years, there is a risk that further residential developments will merely redistribute housing demand over a more dispersed area resulting in further infrastructure challenges.
- The FDS does not identify additional industrial land for development in this location and therefore there is no supporting infrastructure planned. As such, there is the potential for capacity constraints with the infrastructure needed for this proposal.
- The Future Proof Business Capacity Assessment 2023 (BCA)³ identifies a sufficient supply of industrial land in the short and medium term (1-10 years), and a 114ha shortfall of industrial land in Hamilton City in the long-term (11-30 years). However, there are significant areas of industrial development proposed as part of other fast-track projects listed in Schedule 2 of the Act and applications that have been referred under the Act around the periphery of Hamilton. Collectively, listed and referred projects (excluding the 25ha proposed for industrial purposes in this project) propose

¹ [Rogerson Block, SL1](#)

² [Hamilton Southern Links](#)

³ Business Development Capacity Assessment 2023

a total of approximately 266ha of additional industrial development⁴; exceeding the demand for industrial land identified in the BCA in the long-term (11-30 years). It should also be noted that while the BCA provides territorial authority-specific demand and capacity information, it recognises the integrated nature of the Waipā and Waikato districts with Hamilton City, and states “At the total FPP⁵ level, the plan-enabled capacity for retail and industrial land (plus a competitiveness margin) is sufficient to meet the anticipated growth needs over the long term”.

- We consider the significant amount of industrial land supply proposed around the Hamilton periphery under the Act to be relevant context for assessing the benefits of this referral application. Considering the proposed project only in relation to the long-term shortfall forecast in the BCA 2023 is overly simplistic and would overlook the current context in relation to the industrial market of Hamilton and the wider Future Proof sub-region.
- Additionally, if all these proposed projects were to be progressed over a similar timeframe, this may pose a challenge for ensuring the creation of a well-functioning urban environment, particularly in relation to cumulative impacts on infrastructure and servicing.

Is this project consistent with local or regional planning documents, including spatial strategies?

- WRC considers the project is inconsistent with criterion (x) under section 22(2)(a) of the Act relating to regional or local planning documents because the project site is not identified for future development in any regional or local planning documents or spatial strategies.

Future Proof Strategy

- The Future Proof Strategy⁶ 2024, is a 30-year growth management and implementation plan for the Hamilton, Waipā, Waikato and Matamata-Piako sub-region and is the Future Development Strategy (FDS) for the sub-region (as per the requirements of the National Policy Statement on Urban Development 2020 (NPS-UD)). The Strategy aims to manage growth in a staged and coordinated manner. It has a compact and concentrated approach to growth, with future development focused in and around key growth areas that are identified on the settlement pattern map.
- The SL1 area has not been identified for growth in the Future Proof settlement pattern (Map 6), which is also incorporated in the Waikato Regional Policy Statement

⁴ Based on the application documents on the Fast-track website.

⁵ Future Proof partnership

⁶ Our strategic direction | Future Proof

(WRPS). The site is also not identified for development in the Waipā 2050 Growth Strategy. Further comments in relation to the WRPS are provided below.

Spatial Plans (North Waipā/South Hamilton)

- The applicant refers in their Attachment 26 to the recent draft spatial plan work which has not, at the time of writing, been adopted by Future Proof. This work outlines a range of possible future growth scenarios for the wider SL1 area.
- This spatial concept work, which does not preclude the Houchens proposal, makes clear that land use planning in the wider SL1 area must anticipate, align with, and support the delivery of regionally significant infrastructure including Hamilton Airport, the Southern Links transport corridor, and the Southern Wastewater Treatment Plant to enable efficient, co-ordinated growth over time.
- This requires planned investment in infrastructure, staging and is highly funding dependent. The above components may not be resolved in sufficient detail within the timeframe of the Fast Track process for this project and may be more suited as part of an integrated regional spatial planning process over the next three years. The latter would enable a better understanding of new three waters strategies, infrastructure staging, and future funding pathways (considering new funding tools) in this area, than the current adopted Future Proof strategy.

Waikato Regional Policy Statement

The planning memorandum (Attachment 2 to the referral application) does contain an assessment of the Waikato Regional Policy Statement, however, we consider there are notable omissions regarding the out of sequence criteria as detailed below.

Urban form and development

The proposal is not consistent with the Future Proof settlement pattern, which is embedded in the Waikato Regional Policy Statement (WRPS) and the decisions version of WRPS Change 1 - National Policy Statement on Urban Development 2020 and Future Proof Strategy Update [2023].

WRC staff note that there is a high-level reference to SL1 as a 'future' urban enablement area within Table 9 of the Future Proof Strategy and that the wider SL1 area is also subject to a Strategic Boundary Agreement. These areas have not been included as an urban enablement area (i.e. an area identified for growth) in the Future Proof settlement pattern (shown spatially on Map 6) as this area is not currently required within the 30-year period of the Strategy.

Specifically, Map 43 within WRPS Change 1 – Decisions version, depicts the Future Proof indicative urban and village enablement areas. The subject site is not identified as an urban enablement area on this map. The proposal therefore represents an unanticipated development.

WRC staff consider that a number of specific provisions from the WRPS are relevant to the proposal and should be assessed as part of any substantive application:

- Policy UFD-P11,
- UFD-P15, Method UFD-M49,
- Appendices APP11 – General development principles, and APP13 – Responsive planning criteria (out of sequence and unanticipated developments).

Assessment of these provisions is necessary to understand matters such as whether the development would add significantly to meeting a demonstrated need or shortfall for housing or business floorspace, how it would contribute to well-functioning urban environments, and how it would impact infrastructure capacity and contribute to infrastructure and housing affordability.

Te Ture Whaimana o te Awa o Waikato

Te Ture Whaimana o te Awa o Waikato (the Vision and Strategy for the Waikato River) is incorporated into the WRPS. Given the site's location within the Waikato River catchment, any substantive application should address in detail how it will give effect to Te Ture Whaimana.

Hazards and risks

The level of detail supplied in the documentation with respect to hazards and risks does not lend itself to any meaningful assessment against the RPS.

The substantive application should include an assessment of the relevant provisions of the Hazards and Risks (HAZ) chapter within the RPS, including an assessment on the flood risk associated with the site.

A detailed flood assessment would be needed as part of a substantive application to ensure development of the site gives effect to the WRPS and to the National Policy Statement on Natural Hazards, and that the development does not have offsite impacts.

Land and freshwater

Part of the site consists of peat soils. The relevant WRPS policy is LF-P10 "Manage the adverse effects of activities resulting from use and development of peat soils, including by slowing the rate of subsidence and the loss of carbon by oxidation from peat soils".

WRC staff consider that there is the potential for residential or industrial development of the site to lead to further ground surface subsidence as the de-watered peat consolidates and breaks down (oxidises).

Ongoing ground surface subsidence may present ongoing challenges for construction and infrastructure development at the site. Oxidation of the peat may also result in further carbon dioxide (a greenhouse gas) emissions to the atmosphere.

As a result, an assessment of the effects of subsidence from this proposal would be required in any subsequent substantial application.

The desktop assessment in the application makes use of available regional-scale soil and LUC spatial information. Based on the latest regional-scale soil information (S-map), the report suggests that the proportion of Organic ('peat') Soils contained within the property may be less than suggested by earlier mapping. Although this may well be the case, property-scale soil mapping of the site would be helpful to confirm the extent of Organic Soils (and the location and distribution of the other soil types) at the site in the substantive application.

OTHER CONSIDERATIONS

National Policy Statement – Highly Productive Land 2022 (NPS-HPL)

Although the existing Waipā District Plan Large Lot Residential zone reduces the area of HPL on rural land within the site, there remains a total 29.3 ha of HPL suitable for pastoral grazing use (according to the applicant's report) that would be lost from production if the proposal proceeds, adding to the irreversible, cumulative loss of HPL across the region.

Therefore, part of the site meets the transitional definition of 'highly productive land' under the National Policy Statement for Highly Productive Land 2022 (NPS-HPL). The requirements under Clauses 3.8-3.10 of the NPS-HPL will therefore be relevant to any substantive application.

The applicants Land Use Capability classification report correctly indicates that no land within the site is classified as being High Class Soils as currently defined in the WRPS (and the Waipā District Plan) because organic soils are excluded from this definition. However, under the NPS-HPL, the areas of LUC class 2 land are classified as HPL

The planning assessment provided indicates that part of the site has been identified in a strategic planning document as being scheduled to be developed within ten years of the NPS-HPL becoming operative (i.e. a future development area). It references that future development areas are excluded from being identified or mapped as HPL.

This part of the planning assessment is not correct. This specific site is not identified in the WRPS Change 1 – Decisions version or the Future Proof Strategy as a future urban enablement area. Whilst there is a strategic boundary agreement in place for the wider SL1 growth cell, it is to be implemented in a manner that gives effect to the Future Proof Strategy and that agreement, in itself, does not constitute sufficient identification of the site in a strategic document as land suitable for commencing urban development in the 10 year timeframe.

Ecosystems and indigenous biodiversity

The following comments in response to Attachment 8 of the application are provided:

- Any subsequent substantive application needs to include an assessment of the ecological effects post construction – for example effects of light/noise on fauna and any effects of increased pests (associated with urbanisation) on fauna, etc.
- Any subsequent substantive application would need to include up to date information e.g. Figure 2 within the documentation supplied needs to be updated with a more recent basemap – it is three years old and does not accurately represent the current situation.
- The substantive application will need to include an assessment to determine whether wetlands on the site are ‘natural inland wetlands’ as defined by the National Policy Statement for Freshwater Management 2020 and, if so, the application should include how any loss will be avoided, and/or their values protected, and any proposed restoration.
- As part of the substantive application, assessments for fauna, flora and wetlands should be presented and if appropriate the applicant should proffer the preparation of management plans, such as:
 - Bat Management Plan (including lighting designs)
 - Bird Management Plan (including avoidance measures)
 - Lizard Management Plan (including salvage and relocation site attributes)
 - Restoration/Planting Management Plan
 - Pest/Weed Management Plan (including ongoing management)
 - Wetland Management Plan (demonstrating no loss of extent)

Stormwater

The proposed approach is consistent with what WRC would want to see but achieving the targets and criteria may be challenging based on the existing environment and, the hydrological conditions as the groundwater is high and there are peat/organic soils present throughout the site.

Stormwater management needs to be demonstrated in any substantive application, particularly how management within the subject area is integrated with the wider surrounding area including the northern aspect of SL1 and ensuring development does not result in any adverse downstream issues.

The Mangakotukutuku Integrated Catchment Management Plan (ICMP) is in late stages of development by Hamilton City Council (HCC). Design assumptions and attenuation requirements for proposed on site water bodies need to be assessed to ensure there is alignment with the final certified ICMP.

Transport

More understanding is needed on infrastructure and roading timings in relation to the proposed staging, including how SL1 Houchens will connect with the northern SL1 areas and the other adjoining land areas within the strategic boundary agreement area.

It is important that the project aligns with the strategic direction set out in the Regional Land Transport Plan and Regional Public Transport Plan, both of which emphasise enabling well-connected, accessible, low emission, multi-modal transport networks.

New and upgraded roading infrastructure is proposed to connect the development to the main roads that surround the development in several key locations. It is critical that connections are made that will support all modes of transport including buses, walking, cycling and micromobility.

The layout of the proposal with State Highway 3 and the proposed southern links route on two sides of the development, and with limited access points from those roads into the development, will likely create a barrier to walking and cycling modes that will need to be addressed in the development to avoid poor access to the surrounding area.

WRC supports investment in walking and cycling infrastructure that would support medium and high density living within the development as well as connections to the urban area of Hamilton.

WRC supports the recommendation in the report to investigate opportunities to connect active modes via Houchens Road. We suggest detailed consideration is given to how these connections would be made during the stages of the development, in particular, how connections would be made if the southern end of the development is to be developed first.

WRC suggests detailed consideration is given to safe connections to other areas e.g. Peacocke future development to improve connectivity and accessibility in any substantive application.

In terms of public transport, we note the references to the Metro Spatial Plan Business Case future rapid transit route RT4 , however, we note that further work has superseded this and while the Metro Spatial Plan and Regional Public Transport Plan aspirations are still relevant, we would suggest reaching out to Waikato Regional Council and Hamilton City Council for the most up to date information.

WRC supports in principle the concept of connecting the development to the rapid transit route RT4 corridor in the future and would anticipate that opportunities to speed this up be investigated and prioritised. We support in principle the short-term approach to extend public transport services into SL1 Houchens as it develops.

Acid sulphate soils

WRC's preliminary regional Acid Sulphate Soils Probability spatial layer⁷ indicates a high probability of acid sulphate soils occurrence across part of the site. When disturbed (e.g. excavated) and exposed to oxygen, acid sulphate soil materials can produce sulfuric acid which can become mobilised following rainfall. This can lead to impacts on the environment, including aquatic ecosystems, and infrastructure. The potential for the occurrence of acid sulphate soils at the site should be considered in relation to the proposed development.

It is recommended that the applicant develops a strategy for managing acid sulphate soils encountered during the various stages of construction and addresses this matter in detail within any substantive application.

Water supply

The applicant's preferred option is to source potable water via the HCC network. To enable this the Company has applied to WRC for a consent to take water from the Waikato River. WRC are presently processing this application which will provide for potable water for supply to the wider SL1 area inclusive of the Houchens block.

Water for the retirement village within the development is proposed to be provided by a groundwater take. The property is located within the Hamilton Basin – West groundwater management level area. The current allocation level for this management level area is such that there is sufficient allocation available to provide for a groundwater take consent that will be required.

The proposed development will trigger a wide variety of activities in the Waikato Regional Plan and will subsequently require several associated resource consents. WRC is available to have early discussions with the applicant on these matters.

Wastewater reticulation

Regarding the management of wastewater, we note the applicant is in discussions with HCC regarding connecting to the municipal reticulated system.

If connection to the HCC wastewater system is not available, then the substantive application will need to address how wastewater from the proposal will be provided for. WRC anticipates that resource consents will be required under these circumstances.

Earthworks

This project is a large and intensive development comprising of residential lots, a retirement village and industrial lots, to be developed in stages. The topography of the land is variable ranging from flat to rolling, so the staged land disturbance activities will need to be

⁷ Waikato region acid sulfate soils preliminary risk assessment | Waikato Regional Council

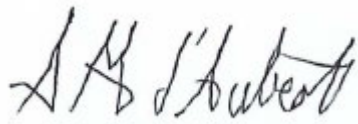
Attachment A

undertaken with regard to WRC's Earthworks and Sediment Control Guidelines and approved Earthworks and Sediment Control Plans.

These plans should also include appropriate management practices should acid sulphate and peat soils be uncovered during each stage of earthworks.

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

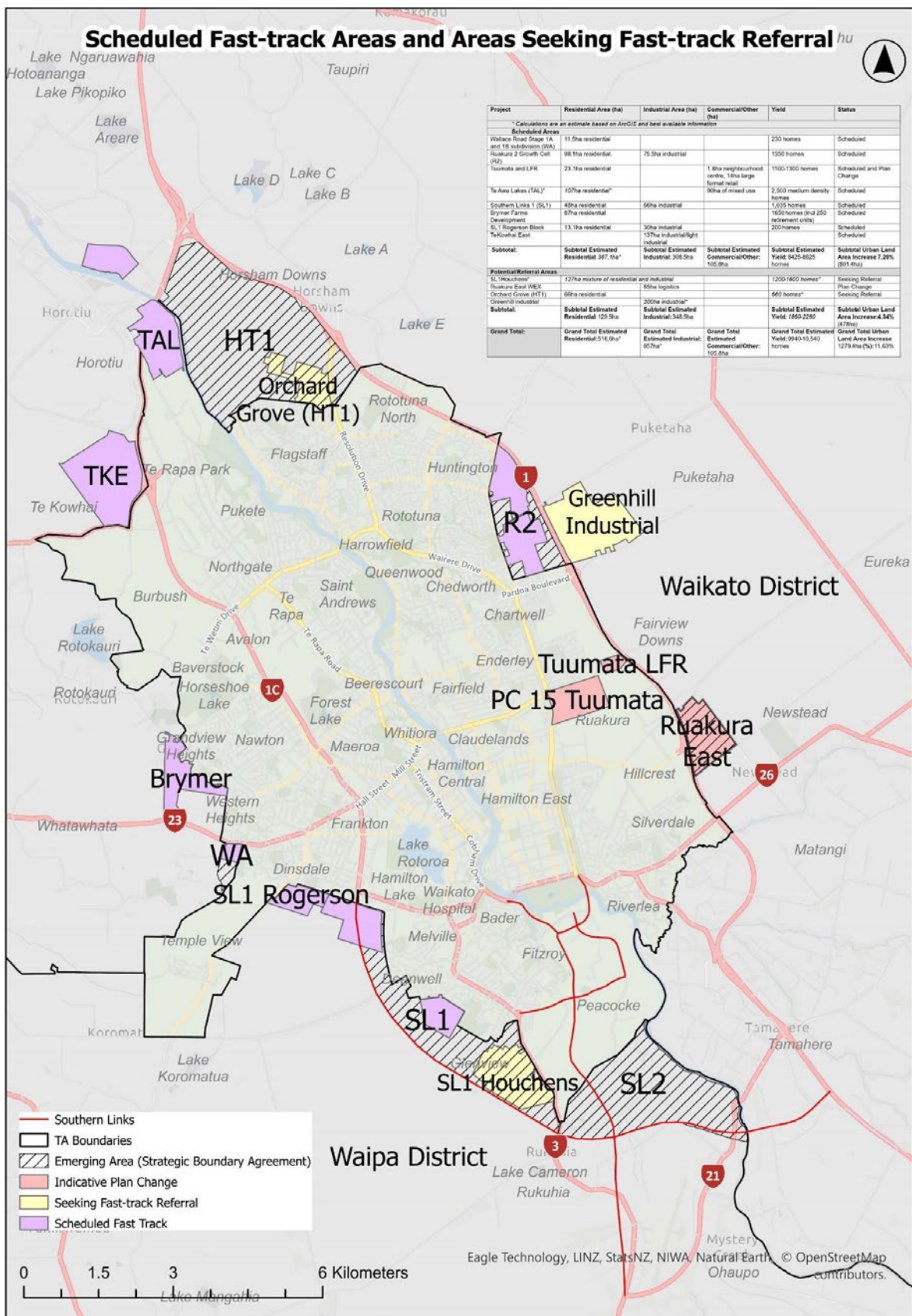
Managers signoff

A handwritten signature in black ink, appearing to read 'AM d'Aubert', is written over a light blue rectangular background.

AnaMaria d'Aubert

Date 21 April 2026

Manager – Regional Consents



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

Project name	SL1 Houchens Development
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

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

1. Contact Details

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

Organisation name (if relevant)	Waipā District Council		
*First name	Wendy		
*Last name	Robinson		
Postal address	Private Bag 2402, Te Awamutu 3840		
*Contact phone number	s 9(2)(a)	Alternative	s 9(2)(a)
*Email	s 9(2)(a)		

2. Please provide your comments on this application

General comments provided by Waipā District Council under section 17 (1)(a)

While the property is located in Waipā District, council planning staff have been engaging with the respective Future Proof partners (Hamilton City Council, Waikato Regional Council and Waka Kotahi) and the applicant in a boundaryless planning approach to support the regions broader strategic priorities. These referral comments should be read in conjunction with those also provided by Hamilton City Council, Waikato Regional Council and Waka Kotahi.

The properties subject the referral application are recorded as 3102 Ōhaupō Road and 3134 Ōhaupō Road, RD2, Hamilton are located in a relatively large area of land subject to a strategic boundary agreement between Hamilton City Council and Waipā District Council (WDC) referred to as the 'Priority 1 Area – Southern Links Land Area'. The agreement outlines a process for the future transfer of this land from Waipā District Council to Hamilton City Council It is assumed that a boundary change may occur [during the 2027-37 Long Term Plan period], if initiated by Hamilton City Council, but the timing and outcome remain uncertain.

Key strategic infrastructure is required to enable the full buildout of the proposed development, including the Hamilton Southern Links (HSL) expressway and sustainable water supply and wastewater services.

There is not any reticulated three waters infrastructure provided or imminently planned to these properties by Waipā District Council or Hamilton City Council. Given the proximity of these properties to Hamilton and the Hamilton City Council reticulated network, the developer is investigating options to service via Hamilton/IAWAI networks. Waipā District Council is working with Waikato Waters Limited to ensure the appropriate legal mandate is provided to support that scenario.

Development Contribution Policies for both Waipā DC and Hamilton CC do not cover this land, so status quo arrangements are inadequate for funding and servicing. All options are being considered to ensure growth pays for growth.

Section 22 of the FTAA lists the criteria for accepting a referral application. Section 22(1)(b) specifically asks the Minister to consider whether the fast-track approvals process:

- a. Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and
- b. Is unlikely to materially affect the efficient operation of the Fast-Track approvals process.

It appears that the full build out of this proposed development is reliant upon key water, wastewater and transportation infrastructure being operational and that being realistically 10 years away. Waipā District Council questions whether this Fast Track approvals pathway is the most appropriate in this instance.

General Comments Provided under section 17(3)

a) Significant regional or national benefits

The infrastructure constraints for this proposed development and the corresponding delays to full-build out, must be considered when evaluating the economic benefits of this proposed development. The analysis should also include an assessment of the capacity that could be enabled by the other Fast Track areas within the wider SL1 area as well as those around the Hamilton periphery.

b) Alignment with the relevant district plans, policies, and/or strategies

The referral application addresses the below National Policy Statements and National Environmental Standards:

- National Policy Statement for Freshwater Management 2020
- National Policy Statement for Indigenous Biodiversity 2023
- National Policy Statement on Urban Development 2020
- National Policy Statement for Natural Hazards 2025
- National Policy Statement for Infrastructure 2025

- National Environmental Standards for Air Quality 2004
- National Environmental Standards for Freshwater 2020

The application considers that the project is consistent or will not be inconsistent with the above planning instruments.

The following comments only relate to relevant planning instruments or relevant sections of planning instruments not addressed by the referral application. Comment on the NPS-HPL is provided below as there is some disagreement with the applicant's assessment of how its applied.

Future Proof Strategy 2024 – 2054

The Future Proof Strategy is a 30-year growth management and implementation plan specific to the Hamilton, Matamata-Piako, Waipā and Waikato sub-region within the context of the broader Hamilton-Auckland Corridor, the Hamilton to Tauranga Corridor and Hamilton Waikato Metropolitan areas. The Future Proof Strategy incorporates the requirements for a Future Development Strategy under the National Policy Statement on Urban Development. The strategy's growth management approach will be focused in (through infill and intensification) and around (greenfields) the key growth areas shown on the Future Proof settlement pattern map [Map 1].

Part 3 (Implementation) Sub-part 4 (Future Development Strategy of the National Policy Statement – Urban Development requires councils to prepare a Future Development Strategy (FDS) which sets out how a local authority intends to achieve a well-functioning urban environment and provide sufficient development capacity over a 30-year period. The requirement to prepare an FDS, is fulfilled by the Future Proof Strategy.

Table 9 (Part C – Meeting Demand) of the strategy identifies 'Hamilton southern future growth cell S1 (Southern Links)' as part of Hamilton's urban enablement area for meeting housing targets.

Part D (Our Implementation Programme) of the Future Proof Strategy addresses 'Priority Development Areas'. One of these priority areas is North Waipā – South Hamilton that identifies and maps the SL1 area. As the referral project area has been identified for future development, it is, in the simplest sense, considered there is alignment with the Future Proof Strategy.

National Policy Statement - Highly Productive Land 2022 (NPS-HPL)

The Chinamans Hill Limited owned land (3102 Ōhaupō Road) is zoned Large Lot Residential in the Waipā District Plan and is therefore exempt from the NPS-HPL. The remaining development area is Rural Zone and is classified as Class 2 (NZLRI) meaning the land is considered Highly Productive Land for the purpose of the NPS-HPL.

The NPS-HPL requires New Zealand's most productive land to be identified and managed to prevent inappropriate subdivision, use and development, with its one, and only, objective stating "Highly productive land is protected for use in land-based primary production, both now and for future generations". Council's must give effect to the NPS-HPL, as if references to highly productive land were references to land that, at the commencement date is either zoned general rural, and LUC 1, 2 or 3, but is not identified for future urban development, or subject to a plan change to rezone it from

rural to urban. In terms of the subject site, NZLRI Mapping shows the site has Class 2 Land Use Capability. Given this classification, the proposal requires assessment under the NPS-HPL.

The planning assessment provided with the referral application (Attachment 2) outlines their view the proposal is exempt from the mapping as per section 3.4 of the NPS-HPL on the basis of the land being identified in the Future Proof Strategy as an area for “investigation” for future urbanisation and has also been identified as an ‘Emerging Growth Area’ by HCC in their Hamilton Urban Growth Strategy (HUGS). As the mapping by the regional council has not been completed, the correct section to apply is 3.5 (7) (b) of the NPS-HPL which requires areas to have been identified for future development. While the referral project land has been identified as a ‘Priority Development Area’ (North Waipā – South Hamilton) in the Future Proof Strategy and it is also noted as an emerging growth area by the Hamilton Urban Growth Strategy, it appears it does not strictly meet the definition of the NPS-HPL definition of ‘identified for future development’ because it is not confirmed as being suitable for commencing urban development over the next 10 years. Accordingly, council staff consider the NPS-HPL will apply to this development.

Waikato Regional Policy Statement

An assessment of the WRPS was not provided with the referral application. Assessment comments about the referral application in regard to the Waikato Regional Policy Statement (WRPS) will not be provided here as Waipa District Council will defer to the comments provided by Waikato Regional Council.

Operative Waipā District Plan 2016

The referral application property is located in the Large Lot Residential and Rural Zone and a range of overlays such as the Southern Links (NZTA) designation, Hamilton Airport overlays and a Peat Soil overlay. The District Plan contains a number of objectives and policies that directly relate to this referral application. Those objectives and policies are contained in Section 1 -Strategic, Section 3 - Large Lot Residential Zone, Section 4 – Rural Zone and Section 15 Infrastructure, Hazards, Development and Subdivision.

Section 1 – Strategic

Section 1 contains the strategic direction of the Plan and provides the basis upon which growth within the district will be managed and protected. These objectives and policies demonstrate the strategic focus to carefully manage the district’s growing population, infrastructure demands, and protection of environmental, heritage and recreation values.

The objectives and policies in this section seek to ensure development occurs in a location in which it is provided for. The objective and policies highlight the association of development with the wider strategic direction of both the district and region. A particular policy seeks to ensure that the natural resources of the Rural Zone, including high class soils, continue to be used for rural activities by ensuring that development and subdivision activities within the Rural Zone do not reduce the area of land available for farming activities in the district. As the proposal is for future industrial and residential development, it is not in alignment with this objective and policies of the District Plan.

Another objective (Planned and integrated development 1.3.2) seeks to ensure that development and subdivision happen in a way and at a rate that is consistent with the anticipated settlement pattern, maximises the efficient use of zoned and serviced land, and is co-ordinated with cost effective infrastructure provision. A policy within this objective aims to allow subdivision and development that will give effect to the settlement pattern and directions of the Waikato Regional Policy Statement and that is consistent with the settlement pattern and directions in the Future Proof Growth Strategy and Implementation Plan 2009. The development area is not listed in the Waikato Regional Policy Statement (Table 35 (APP12)) as an area identified for future industrial land.

Section 3 – Large Lot Residential Zone

The Large Lot Residential Zone provides for large sites with an open nature, low density residential living with dwellings set well back from roads and adjoining properties. The objectives and policies within Section 3 – Large Lot Residential Zone specifically seek to avoid reverse sensitivity issues on nearby rural land and maintain character within the Large Residential Zone use.

The project involves medium density residential development including a retirement village, commercial hubs and 25 hectares of industrial land which is considered to be contrary to the objectives and policies of the Large Lot Residential Zone.

Section 4 - Rural Zone

The objectives and policies within Section 4 – Rural Zone, provide a framework to enable continued use of the Rural Zone for a wide range of rural productive activities while continuing to emphasise the need to internalise adverse effects, and avoid cumulative adverse effects of land use activities on the environment. The objectives and policies further seek to find a balance between economically driven farming practice and amenity, landscape, biological, cultural and social values.

The project involves medium density residential development including a retirement village, commercial hubs and 25 hectares of industrial land which is considered to be contrary to the objectives and policies of the Rural Zone.

Section 15 Infrastructure, Hazards, Development and Subdivision

The Waipā District Plan maps these properties and the wider area as being subject to ‘Peat Soils’. Section 15.2 (Resource Management Issues) outlines that development and subdivision needs to occur on land that is suitable for the intended use. In some areas of the Waipā District, this is more difficult due to physical constraints including soil types such as peat that hinder stormwater soakage.

Objective 15.3.5 aims to ensure that the primary productive potential of the rural land resource is retained and enhanced. Policy 15.3.5.4 is specific to peat soils in that the policy aims to protect peat soils by recognising that peat soils may limit the location of development and recognise the productive capacity of peat soils. The referral application includes a hydrological assessment with some commentary of stormwater disposal and that additional testing of the local hydraulic properties is required to determine the hydrological effects of the development. It should not be

underestimated the challenges this proposed development presents for construction and ongoing maintenance resulting from the peat in this location (shallow and deep).

Overall, development for residential and industrial activities is not considered to be in alignment with the Waipā District Plan.

Ahu Ake – Waipā Community Spatial Plan

Ahu Ake is Waipā's roadmap for how we get to where our community want our District to look and feel in 30+ years. Alignment Future Proof Strategy is important to our collaborate approach to growth in the subregion - ensuring development happens in the right places.

Waipā 2050 Growth Strategy (2009)

The Waipā 2050 Growth Strategy represents the majority of growth areas as being in or around Cambridge and Te Awamutu. The application site is not identified as a growth area in the Waipā Growth Strategy. The referral application is therefore not in alignment with the Waipā 2050 Growth Strategy. However, it is noted that this document is under review due to the age of the current growth strategy.

c) Infrastructure and commercial matters to be addressed through the substantive application:

Coordinated cross-boundary servicing and commercial agreements

Waipā's expectation is that all servicing and funding arrangements must follow a coordinated, whole of system approach across the relevant servicing entities, including Hamilton City Council (HCC), IAWAI / Waikato Waters Limited (WWL), Waka Kotahi (NZTA), and Waipā District Council.

Waipā considers it important that:

- servicing strategies and commercial agreements are developed collectively, rather than in isolation with individual entities;
- infrastructure delivery, funding, and long term ownership outcomes do not result in financial burdens or subsidisation being transferred to existing Waipā or Hamilton communities; and
- any interim or transitional servicing arrangements clearly identify where infrastructure costs sit prior to, and following, any future local authority boundary adjustment.

Boundary change implications and residual infrastructure risk

Given the location of the site within the Southern Links strategic boundary area, Waipā considers it important that the substantive application clearly demonstrates how infrastructure assets will be managed so that no residual or stranded infrastructure remains within Waipā District following any future boundary adjustment between Waipā District Council and Hamilton City Council.

This includes, but is not limited to:

- three waters assets;

- stormwater assets and overland flow paths;
- transport infrastructure and corridors; and
- any operational or maintenance obligations arising prior to boundary transfer.

As a specific example, Waipā notes that the southernmost stormwater basin shown in the referral material is located on the opposite side of the current NZTA Southern Links designation.

On the basis of the information provided:

- the basin appears somewhat disconnected from the main development area and from the likely future boundary change extent; and
- long term access is potentially constrained, with access theoretically only achievable via the future state highway network.

From Waipā's perspective, this raises matters of:

- long term access and maintenance;
- infrastructure ownership and vesting; and
- compatibility with future changes to Roads of National Significance (RoNS) design and operational standards.

Waipā considers these are matters that must be fully resolved and demonstrated through the substantive application stage to avoid inappropriate legacy infrastructure outcomes.

Waipā District Council Invitation to Comment Specific Requests 1 -2

Under section 17(3) of the Act and without limiting any general comments under subsection (1)(a), Waipā District Council must provide comments advising on the following matters:

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

Section 47 (*EPA makes recommendation on whether there are competing applications or existing resource consents for same activity*) of the Fast-track Approvals Act 2024 relates to resource consents referred to in section 30(3)(a), which in turn relate to resource consents that apply to section 124C(1)(c) or 165ZI (Resource Management Act 1991). These sections relate to resource consents granted under sections 12, 13, 14, and 15 (Resource Management Act 1991) which relate to functions of a regional council. Accordingly, this question is more appropriately responded to by Waikato Regional Council.

- 2. In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied***

Insert Fast-track logo

for as a resource consent under the RMA. If no such consents exist, please provide written confirmation.

Section 124C(1)(c) and 165ZI (Resource Management Act 1991) relate to resource consents granted under sections 12, 13, 14, and 15 (Resource Management Act 1991) which relate to functions of a regional council. Accordingly, this question is more appropriately responded to by Waikato Regional Council.

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

Managers signoff



Wayne Allan

GROUP MANAGER DISTRICT GROWTH & REGULATORY SERVICES

Date: 20 April 2026

Hon James Meager

Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport



JMITC-48

22 April 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Private Bag 18041
WELLINGTON 6160

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

Fast-track Approvals Act – SL1 Houchens Development (FTAA-2602-1174)

Dear Chris,

Your invitation to Hon Tama Potaka to comment on the fast-track consent application for the SL1 (Southern Links 1) Houchens Development, proposed within Waipā District on the southwestern edge of Hamilton City, has been referred to me to comment as Acting Minister of Housing.

The proposal seeks approval for a large-scale, comprehensively planned development incorporating approximately 1,300 residential dwellings of varying densities, an approximately 400-unit retirement village including aged care facilities, neighbourhood centres, strategic industrial land, and associated transport, three waters and open-space infrastructure.

Waipā District is projected to experience ongoing population and housing growth over the long term. The proposal would deliver a significant amount of housing and provide a range of housing typologies and retirement accommodation. While current district and sub-regional growth strategies focus growth toward established urban centres, the site is part of an area identified through longer-term growth planning, and the proposal would contribute to increasing overall housing supply within the wider region.

The subject site is currently zoned Large Lot Residential and Rural, and the scale and timing of urban development proposed is not currently aligned with the operative Waipā District Plan, Waipā 2050 Growth Strategy, or Ahu Ake - the Waipā Community Spatial Plan. These emphasise staged and sequenced growth and direct most residential development toward established urban centres, particularly Cambridge and Te Awamutu.

The site forms part of the wider SL1 growth area identified through sub-regional planning. While the proposal is aligned with these plans at a high level, Waipā District Council has raised concerns regarding the timing of development relative to planned infrastructure delivery. The proposal is dependent on major transport and wastewater infrastructure, including Hamilton Southern Links, which is not yet funded or committed. Waipā District Council have also highlighted unresolved issues relating to infrastructure funding, cross-boundary servicing responsibilities, and development contributions. These issues would need to be worked through at the detailed consenting stage should this proposal proceed.

While I acknowledge the feedback provided by Waipā District Council, from the perspective of the Housing Portfolio I have no objection to this application being referred to the next stage of the fast-track process. The planning, infrastructure and sequencing matters outlined above can be considered in more detail should the project proceed.

Thank you again for the opportunity to comment.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'James Meager', is written over a printed name and title. The signature is stylized with large loops and a long horizontal stroke.

Hon James Meager
Acting Minister of Housing

From: [Infrastructure Portfolio](#)
To: [FTArefferrals](#)
Subject: FW: Invitation to comment on Fast-track referral application for the SL1 Houchens Development under the Fast-track Approvals Act 2024 – FTAA-2602-1174 - For Minister's Office
Date: Tuesday, 31 March 2026 10:13:49 am

From: Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Sent: Tuesday, 31 March 2026 9:15 AM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: RE: Invitation to comment on Fast-track referral application for the SL1 Houchens Development under the Fast-track Approvals Act 2024 – FTAA-2602-1174 - For Minister's Office

Good morning,

Confirming Minister Goldsmith has no comment

Kind Regards,



Office of Hon Paul Goldsmith
Minister for Arts Culture and Heritage | Minister of Justice
Minister for Treaty of Waitangi Negotiations | Minister for Media and Communications

Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Friday, 20 March 2026 9:04 am
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Hon Shane Jones <Shane.Jones@parliament.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Casey Costello (MIN) <C.Costello@ministers.govt.nz>
Cc: FTArefferrals <ftarefferrals@mfe.govt.nz>
Subject: Invitation to comment on Fast-track referral application for the SL1 Houchens Development under the Fast-track Approvals Act 2024 – FTAA-2602-1174

To:

- Minister for Economic Growth
- Minister for Regional Development
- Minister for the Environment
- Minister for Arts, Culture and Heritage
- Associate Minister of Housing
- Minister of Conservation
- Minister for Seniors

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister), has asked for me to write to you on his behalf.

The Minister has received an application from Chinamans Hill Limited and Ohaupo Land Limited Partnership for referral of SL1 Houchens Development project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA- FTAA-2602-1174).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **20 working days** of receipt of this email, being 21 April 2026. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferrals@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Minister for Infrastructure's office they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform my office and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	SL1 Houchens Development
Applicant	Chinamans Hill Limited and Ohaupo Land Limited Partnership
Location	Southwest of Hamilton
Project description	The project is to construct an approximately 145 hectare combined residential, retirement/aged care, and industrial development located on the southwestern fringe of Hamilton City (in the Waipa District), bounded by State Highway 3 (Ohaupo Road) and Houchens Road, within the Southern Links 1 growth area in the Waikato Region. The project comprises: a. approximately 1,300 residential lots

- b. approximately 400-unit retirement village, including aged care facilities
- c. two neighbourhood centres
- d. approximately 25 hectares of light industrial land, comprising around 24-47 industrial lots; and
- e. supporting green infrastructure, three waters, and transport connections, including provision for a future Houchens Road connection and a future water reservoir.

Yours sincerely



Office of Hon Chris Bishop

Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport | Associate Minister of Finance | Associate Minister for Sport & Recreation | Leader of the House | MP for Hutt South

Office: 04 817 6802 | EW 6.3

Email: c.bishop@ministers.govt.nz Website: www.Beehive.govt.nz

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0030610

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (FTAA) on the following applications:

- SL1 Houchens Development (FTAA-2602-1174)
- Out of Scope
-

I am providing comment in my capacity as Minister for Economic Growth, focusing on whether the applications are likely to deliver significant economic benefits under section 22(2)(a)(iv) of the FTAA, based on the economic assessments provided by the applicants.

SL1 Houchens Development, FTAA-2602-1174

This application seeks approval for a comprehensively master-planned residential, industrial and service development within the Southern Links 1 growth cell on the south-western edge of Hamilton City, in Waipā District. The proposal covers approximately 145 hectares and enables the delivery of around 1,300 residential dwellings of mixed typologies, a 400-unit retirement village (including aged-care facilities), approximately 25 hectares of net developable industrial land, and two neighbourhood centres, supported by transport, water, wastewater and stormwater infrastructure, and green infrastructure.

According to the economic assessment provided by the applicant for its referral application, the proposal is estimated to deliver a one-off increase in national gross domestic product of approximately \$741 million over an estimated 15-year development period. Construction and development activity is estimated to support approximately 5,100 full-time equivalent job-years, equivalent to sustaining around 340 people in full-time employment over the development period and generate approximately \$437 million in additional household incomes.

While the quantified economic benefits are primarily concentrated during the development and construction phase, the proposal's longer-term economic value arises from the coordinated provision of housing and serviced industrial land in a strategically recognised growth area, supporting employment growth and broader urban functioning.

Out of Scope

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis', with a stylized flourish at the end.

Hon Nicola Willis
Minister for Economic Growth

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

Project name	SL1 Houchens Development
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
*Portfolio	Seniors		
*First name	Hon Casey		
*Last name	Costello		
Contact person (if different from above)			
*Contact phone number	s 9(2)(a) [REDACTED]	Alternative	
*Email	s 9(2)(a) [REDACTED]		

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

Minister's signoff



Hon Casey Costello
Minister for Seniors

Date 19/4/2026

Hon Casey Costello

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



20 APR 2026
Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act referral application: SL1 Houchens Development, FTAA-2602-1174

Dear Chris,

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

I have considered whether this application is likely to 'increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020)', under s22(2)(a)(iii) of the Act, based on the information provided in the application. I will leave it to you and other relevant Ministers to assess the other criteria.

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

- The construction of a combined residential, retirement, and industrial development with approximately 1,300 residential units and a 400-unit retirement village.

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

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'C' followed by a horizontal line.

Hon Casey Costello

Minister for Seniors

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

Project name	SL1 Houchens Development
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name	Department of Conservation (DOC)		
*First name	Bridgette		
*Last name	Munro		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz ;		

2. Please provide your comments on this application
Comments follow overleaf.

Manager's signoff

Jenni Fitzgerald

21st April 2026

Director-General of Conservation s17 comments

Project name	SL1 Houchens Development
Applicant name	Chinamans Hill Limited and Ohaupo Land Limited Partnership
Application number	FTAA-2602-1174
Project summary details	The SL1 Houchens Development Project ('the Project') is to construct an approximately 145 hectare combined residential, retirement/aged care, and industrial development located on the southwestern fringe of Hamilton City (in the Waipa District), bounded by SH3 (Ohaupo Road) and Houchens Road, within the Southern Links 1 growth area in the Waikato region. The Project comprises: • approximately 1,300 residential lots; • approximately 400-unit retirement village, including aged care facilities; • two neighbourhood centres; • approximately 25 hectares of light industrial land, comprising around 24-47 industrial lots; and • supporting green infrastructure, three waters, and transport connections, including provision for a future Houchens Road connection and a future water reservoir. While the Applicant only proposes to lodge one substantive application for the Project, the delivery is proposed to occur in the following phases: • short term (1–3 years): approximately 500–545 residential lots, 400 retirement and aged care units, and 11–22 industrial lots; • medium term (3–10 years): approximately 460 residential lots, with no additional industrial lots; and • long term (10–30 years): approximately 100 residential lots and 13–25 industrial lots. The Project will require the proposed approvals: • resource consents under the Resource Management Act 1991 ('RMA'); • permits under the Wildlife Act 1953; • authorisations under the Heritage New Zealand Pouhere Taonga Act 2014; • an approval or a dispensation that would otherwise be applied for under regulation 42 or 43 of the Freshwater Fisheries Regulations 1983 in respect of a complex freshwater fisheries activity.

1 General comment

- 1.1.1 As the Project includes an approval or approvals under a specified Act for which DOC is the administering agency, the Applicant was required to undertake pre-lodgement consultation in accordance with section 11(e) of the Fast-track Approvals Act 2024 ('FTAA'). DOC and the Applicant met on the 5th of December 2025. DOC provided written feedback to the Applicant on the 19th of December 2025.
- 1.1.2 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, DOC considers that it is likely that with the appropriate design and conditions, effects can be managed to appropriate levels.

2 Minister's decision on referral application

- 2.1.1 FTAA sections 21 and 22 set out matters to be considered in determining whether a referral application should be accepted.
- 2.1.2 DOC notes that other agencies are better placed to comment on most matters, including those in section 22. Comments below are limited to sections where DOC has specific interests or information relevant to the Minister's decision.
- 2.1.3 For completeness, DOC has considered the criteria in section 22 and has not identified anything it considers the Minister should take into account that has not already been acknowledged by the Applicant in its referral application.
- 2.1.4 DOC has the following comments on sections 21(3) and (4), and section 22:

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	DOC has considered section 5(1) (f), (h), (i), (j) and (k). DOC has not identified any aspect of the Project that would be ineligible under these sections.
21(3)(c)	Is there adequate information to inform a decision	While DOC considers the information adequate in terms of a referral decision, DOC notes that the Ecology Assessment provided with the referral application (prepared by ecoLogical Solutions and dated 14 November 2025) includes an 'initial' terrestrial and aquatic ecological assessment of the Project only. DOC understands that there has been some recent infilling and vegetation clearance on the Project Site that is not highlighted in the Ecology Assessment Figures. If the Project is referred, the potential substantive application should include detailed and robust baseline monitoring and specifically address the presence and management of aquatic fauna, avifauna, lizards, bats, wetland loss, ecological values and any mitigation

Section	Criteria	Comments
		(including relocation of impacted species), offsetting and compensation required. Waterways in the Project area are connected to the Waikato River system. There are records in the Mangakotukutuku catchment for species ranked as Threatened, Nationally Vulnerable (inanga), At-Risk, Declining (longfin eel, giant kokopu, common smelt), and At-Risk, Naturally Uncommon (torrentfish, banded kokopu, redfin bully. Comprehensive fish surveys will be required as part of the substantive application. With regard to lizards, it is noted that a baseline survey should be undertaken in advance of preparing a Lizard Management Plan (LMP). This is required to determine which species are present, how many lizards are likely to be impacted and how they are distributed around the landscape. The baseline survey will be critical to determining and reviewing methods for mitigation (i.e. salvage and proposed release area/s). The Project area is a significant location for bats. Disturbance and displacement of bats should be avoided in the first instance, with measures to minimise and manage effects on bats, loss of habitat, connectivity and artificial lighting effects to bats addressed within the substantive application. Further, pre-felling surveys should be conducted prior to clearance of bat roosts and any bird areas, with tree felling protocols followed when clearing trees from the area. In addition, the substantive application should demonstrate how wetland loss is to be avoided or offset.
21(4)	Are there any other reasons not specified	DOC has not identified any other reasons why the project should not be referred.
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019;	DOC has not identified any inconsistency with any relevant settlement or other obligation. Relevant Treaty Settlement Acts are: • Ngāti Tuwharetoa, Raukawa and Te Arawa River Iwi Waikato River Act 2010; • Nga Wai o Maniapoto (Waipa River) Act 2012; • Waikato Tainui Raupatu Claims (Waikato River) Settlement Act 2010; and • Ngāti Hauā Claims Settlement Act 2014.

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Section	Criteria	Comments
	Marine and Coastal Area (Takutai Moana) Act 2011.	Waikato Tainui – Remaining Claims It is noted that it is not yet clear what impact this Treaty Settlement might have, however the indicated area of interest includes the Project area.
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	DOC has not identified any reason why the required approvals should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Due to the large scale of the Project, DOC considers the Project may have significant adverse effects on the ecological values anticipated to be present. However, based on our knowledge of the existing environment and species expected to occur in the Project area, our understanding of the Project, and our experience of the kinds of design measures and conditions that could be implemented, DOC considers that once more detailed information is available, it would be possible to achieve a project with the imposition of conditions (that are appropriate, enforceable, include best management practice, and apply the relevant ecological management plans, where required), that does not have significant adverse effects on the environment.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the Applicant's compliance history.
21(5)(g)	Would a substantive application have any competing applications	No competing applications have been identified.
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	Wildlife Act and Complex Fisheries Activity approvals would generally take approximately three-four months to process, which is not significantly longer than the FTAA process is expected to take. However, there may be benefits for the Applicant in terms of consideration being combined with RMA approvals (rather than being advanced by a separate process) and given the different decision-making framework under the FTAA.
22(2)(a)(ix)	Will this project address significant environmental issues?	No.
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	The following Statutory Planning documents are relevant to the Project: - Conservation General Policy 2005 (CGP); and - Waikato Conservation Management Strategy 2014.

Section	Criteria	Comments
		The project is not inconsistent with the relevant statutory planning provisions. However, in preparing their substantive application the Applicant should consider: • The relevant provisions in Te Ture Whaimana o Te Awa o Waikato with respect to the catchment of the Waikato River; • Maintaining and restoring the ecological integrity of relevant ecosystems and habitat types; • Conserving any threatened and at-risk species to ensure their persistence; and • Protecting freshwater fish habitat, fish passage and the maintenance of habitat connectivity and water quality of any waterway.
22(b)	Any other matters the Minister may consider as relevant?	The Planning Memorandum submitted with the referral Project information, prepared by Barker & Associates dated 24th of February 2026 notes that the Project may include the diversion of surface water; damming and diversion of groundwater; temporary water take; vegetation clearance and earthworks within or around natural inland wetlands; potential drainage of natural inland wetlands; and potential loss of natural inland wetlands. An assessment against the National Environmental Standards for Freshwater Management will need to be submitted with the substantive application for the Project. The Applicant is seeking “<i>an approval or a dispensation that would otherwise be applied for under regulation 42 or 43 of the Freshwater Fisheries Regulations 1983 in respect of a complex freshwater fisheries activity</i>”. A comprehensive assessment of the relevant approvals required and potential effects resulting from the works will need to be provided within the substantive application to address this.

3 Matters for the Minister to specify (s27)

3.1.1 None identified.

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Jenni Fitzgerald

Fast-Track Applications Manager

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

Date: 21st of April 2026

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



Comments on referral application under the Fast Track Approvals Act 2024

SL1 Houchens Development, FTAA-2601-1174

Contact Details	
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)
Contact person	Ben Henson
Contact Number	s 9(2)(a)
Email	fasttrack@heritage.org.nz

General Comments

1. Chinamans Hill Limited and Ohaupo Land Limited Partnership (Applicant) has lodged an application for referral of the SL1 Houchens Development project (project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. In accordance with section 17(1)(c) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the referral application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.
3. HNZPT has been provided application documents that are relevant to the archaeological authority application. These have been assessed and HNZPT comments as follows:

Consultation and Engagement

4. The applicant consulted with HNZPT on 12 November 2025 providing a desk top archaeological assessment. An updated archaeological assessment, based on a site visit, was provided on 15 December 2025. On 8 January 2026 HNZPT responded, noting that an archaeological authority would be required.
5. Consultation has been undertaken with Ngaati Wairere, Ngaati Maahanga, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Koroki-Kahukura and Ngaati Apakura, with the support of Waikato-Tainui. A tangata whenua group has been formalised and an MOU has been agreed to, providing a Cultural Values Assessment at a later date.

Archaeological Authority Application

6. The Applicant has provided an archaeological assessment that identifies one recorded archaeological site within the project area. The works proposed as part of the project will modify or destroy that site. As such, an archaeological authority is required prior to work commencing.
7. In order to mitigate the adverse effects on archaeological values, a suite of conditions will be required.



Conclusion

8. If the project is referred, HNZPT anticipates further engagement with the Applicant to ensure all relevant documentation is provided with a substantive application, including:

- A fulsome assessment of the archaeological values that will be affected;
- Appropriate draft management plan and research strategy;
- Evidence of appropriate consultation with tangata whenua; and
- Appropriate draft conditions.

NZ Transport Agency Waka Kotahi Reference: 2026-0328
Fast-track Reference: FTAA-2602-1174

8th April 2026

Ministry for the Environment
PO Box 10362
Wellington 6143

Attention: Antonia Croft

Via email: referral@fasttrack.govt.nz

Dear Ms Croft,

Invitation for Written Comments on Application for Referral of the SL1 Houchens Development Project under the Fast-track Approvals Act 2024

Thank you for the opportunity to provide written comments on the request for referral of the SL1 Houchens Development Project (**the Project**) under the Fast-track Approvals Act 2024 (**the Act**).

The NZ Transport Agency Waka Kotahi (**NZTA**) is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (**LTMA**) and the Government Roadway Powers Act 1989. The primary objective of NZTA under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

The Project requires either direct or indirect access to State Highway 3 (**SH3**). SH3 provides an important connection between the Hamilton Central Business District and southern suburbs, to the Airport and Te Awamutu. The project also relies on the Hamilton Southern Links project (**HSL**) (a Road of National Significance) being constructed to enable the Project to release development for later stages. The full extent of the industrial land use proposed is also predicated on HSL being in place. Although the HSL project is expected to improve efficiency and safety for traffic users on SH3 through this section if delivered, no new funding has been allocated to mitigate the effects of the proposed development on SH3 in this location.

In October 2025, Board endorsed the HSL Investment Case, approving funding for the pre-implementation phase for HSL. This includes site investigation, consenting and design which allows the project to be progressed to a delivery-ready state over the coming years. However, funding for construction is not committed and therefore the specific timing of delivery of HSL is uncertain.

Because of the uncertainty around the timing of construction for, and delivery of, HSL, and the increased traffic flows generated by the development in both directions, there will be transport effects on SH3. In the absence of committed funding for construction of HSL, these effects will need to be mitigated to a large extent by the applicant.

This is likely to include requirements to linking the scale and staging of the development, to the delivery of specific transport upgrades, including the construction of HSL. In the interim, such requirements may reduce or defer some of the potential economic benefits of the Project.

NZTA supports in principle the project being referred, subject to the appropriate mitigation of traffic effects and the imposition of clear and enforceable transport-related conditions.

If the Minister does refer the project under section 27 of the Act, we request that:

- NZTA be invited to comment under section 27(3)(b)(iii) of the Act; and
- The following information be included within any substantive application under section 27(3)(b)(ii) of the Act:
 - An Integrated Transport Assessment that includes at a minimum:
 - Updates the land use assumptions to consider all of SL1 which includes a further 520 residential units in “future growth cells”
 - Updates the proposed trip rates that to exclude mode share corrections based on long term aspirational mode share targets. Vehicle trip rate assumptions should be based on the current mode share, not aspirational long-term targets to consider the likely and worse case scenarios
 - Considers how public transport improvements may be funded;
 - Considers active modes of transport including walking and cycling on both urban and rural roads including SH3 south of Whatukooruru Drive.
 - Confirms whether the signalisation of the Ohaupo Road / Houchens Road intersection is to be provided as a condition of consent or assumed to be provided by others.
 - Clarifies the status of the proposed three leg roundabout onto Ohaupo Road including the possible connection to the roundabout from the future Peacocke Structure Plan Collector Road (i.e. fourth arm at the roundabout). Providing this connection potentially runs the risk of loading up SH3 further with unanticipated traffic flows.
 - The safety effects (and how these can be managed) of introducing the proposed three leg roundabout onto SH3.
 - The safety and efficiency effects arising from the signalisation of Ohaupo Road/Houchens Road on other relevant intersections on SH3. Identification of the stages and types of development that may be released only once specific transport infrastructure components (eg. State Highways and local road components) are in place. We would expect that corresponding planning rules or consent conditions would be developed as part of the substantive application to codify this staged approach. This staged approach is necessary due to the uncertainty of construction timing for HSL and no new funding being identified to mitigate the effects of new development on SH3 along this section.

If you have any questions, please contact me.

Yours sincerely



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