



22 June 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ- 0034455

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 on referral applications Awanui Links (FTAA-2604-1216), Mangapapa Wind Farm (FTAA-2605-1231), Milbrow Estate project (FTAA-2604-1223), Oakland Estates (FTAA- 2605-1230) and Shannon Farm Residential and Commercial Extension (FTAA-2605-1234). I am providing comment in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided during this referral stage of the process.

Awanui Links, FTAA-2604-1216

This application is for a comprehensively master-planned mixed-use development at Puketaha, in the Waikato District. The proposal includes an 18-hole championship golf course, 62 visitor units, wellness and hospitality facilities, 70 rural-residential lots, a 137-unit retirement village, a 50-bed care facility, nine light-industrial lots, a 3,000 square metre solar farm, wetlands, open space and supporting infrastructure.

Based on the economic assessment provided by the applicant, total development costs are estimated at approximately \$300 million. Over the five-year build period, the proposal is estimated to generate approximately \$194 million in GDP and \$113 million in wages. It is estimated to support approximately 79 direct FTEs annually and 182 indirect FTEs annually, equivalent to approximately 395 direct FTE-years and 910 indirect FTE-years over the five-year build period, or 1,305 FTE-years in total.

Once fully operational, the non-residential components of the proposal are estimated to support 228 ongoing FTEs, \$29.4 million in annual GDP and \$17.5 million in annual wages. These benefits are expected to come from the golf course and visitor facilities, accommodation, wellness and dining activities, the retirement village and aged-care facility, and light-industrial activity.

The economic assessment provided by the applicant indicates that the proposal's benefits are primarily regional in nature, with the assessment assuming that 85 per cent of the direct and indirect national one-time impacts would accrue to the Waikato region. The proposal could enhance the Waikato visitor economy, increase housing and retirement-living supply, provide additional aged-care capacity, and enable light-industrial activity.

On this basis, the proposal may have significant regional economic benefits under section 22(2)(a)(iv) of the Fast-track Approvals Act 2024. It may also be relevant to section 22(2)(a)(iii), given the proposed rural-residential lots, retirement-living units and aged-care facility, which would increase housing and accommodation in the Waikato District.

Mangapapa Wind Farm, FTAA-2605-1231

This application is for the construction and operation of a large-scale wind farm on the Mamaku Plateau in the Bay of Plenty, between Tauranga and Rotorua. The project would cover approximately 3,800 hectares and include around 70 wind turbines, substations, an on-site battery energy storage system, grid connection and associated infrastructure.

Based on the economic impact assessment provided by the applicant, the project would have installed capacity of approximately 453.6 megawatts and generate around 1.39 terawatt hours of electricity per annum, equivalent to approximately 3.5 per cent of New Zealand's annual electricity demand. The project represents total capital investment of approximately \$1.3 billion, with around \$390 million expected to occur within New Zealand after accounting for imported components.

The assessment estimates that construction activity would contribute approximately \$231.6 million to GDP over the three-year construction period. The project will support approximately 715 direct FTEs and 563 indirect FTEs, equivalent to around 238 direct FTEs and 188 indirect FTEs per year (426 FTEs in total) during the construction period. Once operational, the project is estimated to generate approximately \$138 million in annual revenue, contribute around \$81.2 million to GDP per annum, and support approximately 250 direct and indirect FTEs on an ongoing basis. This is material for the Bay of Plenty region, with the construction phase accounting for approximately 0.3 percent of Bay of Plenty regional GDP per annum, and ongoing operational activity contributing approximately 0.4 percent of regional GDP per annum.

The broader benefits identified in the assessment relate to increased renewable electricity generation, improved energy security, reduced reliance on gas-fired generation, and emissions reduction. Increased electricity generation is beneficial to New Zealand by providing businesses with greater certainty of supply, reduced-price volatility, improved market competition, and contributing to lower electricity prices. The assessment also estimates that the project could avoid approximately 0.72 million tonnes of carbon dioxide equivalent emissions per annum and offset approximately 9 to 10 petajoules of gas annually.

On this basis, the proposal appears likely to deliver material regional and national economic benefits under section 22(2)(a)(iv) of the Fast-track Approvals Act 2024, noting that the Act does not prescribe a specific quantitative threshold for significance.

Milbrow Estate project, FTAA-2604-1223

This application is for a rural-residential lifestyle development at Hamurana, Rotorua. The applicant's economic assessment describes the proposal as comprising 89 premium lifestyle residential lots on an approximately 83-hectare site, with around 30 hectares retained as indigenous forest.

Based on the economic assessment provided by the applicant, the proposal is estimated to contribute approximately \$27.2 million to GDP and support around 175 FTEs during the construction period. Ongoing impacts are estimated at approximately \$2.0 million in annual GDP and around 20 FTEs, primarily associated with household expenditure from future residents.

The broader economic benefits relate to increasing the supply of premium lifestyle housing in the Rotorua District, where the assessment indicates this segment is currently constrained.

The economic assessment provided by the applicant indicates that the proposal's benefits are primarily regional in nature. The estimated benefits are modest in absolute terms but may be material in the context of the Rotorua housing market, particularly within the premium lifestyle segment. The evidence base is strongest in relation to housing market context and construction-related economic impacts, but more limited in relation to wider economic metrics such as net present value.

On this basis, the proposal may have regional economic benefits under section 22(2)(a)(iv) of the FTAA. It may also be relevant to section 22(2)(a)(iii), to the extent that it contributes to increased housing supply within a constrained segment of the local market.

Oakland Estate, FTAA- 2605-1230

This application is for a residential-led development at Stoke, Nelson City. The proposal covers approximately 58 hectares and would provide around 580 to 740 dwellings, with the potential for a retirement village, supporting commercial activities, open space, and local transport, walking and cycling connections.

Based on the economic assessment provided by the applicant, the proposal has been modelled on a 10-year staged delivery programme, delivering 650 dwellings with 6,800 square metres of commercial floorspace. The total project investment is approximately \$472 million. Development activity is estimated to generate approximately 1,665 FTE-years of employment over the development period, including 510 direct and 1,155 indirect FTE-years, equivalent to an average of around 51 direct and 116 indirect FTEs per year. It is also estimated to generate \$149 million in wages and salaries and around \$298 million in GDP for the Nelson-Tasman economy.

Once operational, the future commercial component is estimated to support around 116 FTEs, alongside around \$9 million in annual wages and salaries and more than \$18 million in annual GDP. These ongoing benefits are associated with the local-scale commercial activities enabled by the development.

The economic assessment provided by the applicant indicates that the proposal could materially increase housing supply in a constrained market, improve land market competition, and support a well-functioning urban environment. The assessment describes the site as being in a transitional location between established urban development and rural land and considers it suitable for coordinated urban expansion. It also notes that foregone rural production is expected to be negligible compared with the scale of the proposal's housing and economic benefits.

On this basis, the proposal may have significant regional economic benefits under section 22(2)(a)(iv) of the FTAA. It may also be relevant to section 22(2)(a)(iii), given the scale of proposed housing supply and its potential contribution to a well-functioning urban environment.

Shannon Farm Residential and Commercial Extension, FTAA-2605-1234

This application is for a master-planned residential and commercial extension on approximately 70 hectares in Cromwell, Central Otago. The proposal would provide approximately 755 residential lots, 3.1 hectares of retail and mixed-use commercial land, 5.19 hectares of light-industrial land, open space, green corridors and supporting infrastructure.

Based on the economic assessment provided by the applicant, total development costs are estimated at approximately \$614 million. Construction and development activity is estimated to generate \$365 million in GDP, support approximately 2,528 FTE-years of employment over an eight-year development period, including around 93 direct FTEs and 223 indirect FTEs per annum, alongside approximately \$216 million in wages and salaries.

Once fully built, the proposed retail and industrial components are estimated to support approximately 338 FTEs, alongside around \$37 million in annual GDP and approximately \$23 million in annual wages and salaries.

The broader benefits relate to supporting Cromwell's growth through a material increase in housing supply, additional local employment land, and increased local retail and industrial activity. The assessment notes that Cromwell's population has grown from 3,510 in 1996 to 10,910 in mid-2025, and that the proposal would represent a substantial increase in residential development capacity in a high-growth local market.

The applicant's economic assessment indicates that the proposal's benefits would mainly be felt in Cromwell and the wider Otago region. It assumes that 80 per cent of the project's direct and indirect national one-off impacts would occur in Otago.

On this basis, the proposal appears likely to have significant regional economic benefits under section 22(2)(a)(iv) of the FTAA. It may also be relevant to section 22(2)(a)(iii), to the extent that it would increase housing supply, address housing needs and contribute to a well-functioning urban environment in Cromwell.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Hon Nicola Willis', is written over a light blue horizontal line.

Hon Nicola Willis
Minister for Economic Growth

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

Project name	Awanui Links (FTAA- 2604-1216)
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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.

*Portfolio	Tourism and Hospitality
*First name	Andrew
*Last name	Lim

2. Please provide your comments on this application

We have been asked to provide comments on behalf of the Minister of Tourism and Hospitality on Swordfish Projects Limited's application to use the fast-track process for its Awanui Links project. We have therefore commented only from a Tourism and Hospitality portfolio perspective.

If fully realised, this project has the potential to boost regional tourism activity in the Waikato District through its high-end tourism developments. It is expected to support 228 full-time jobs and contribute more than \$29 million in annual GDP. Approximately one third of these jobs and one quarter of the GDP relates to the tourism offerings within the development. We note that the application does not forecast the volume of domestic/international visitors the development is expected to draw into the district or wider Waikato region, making it difficult to assess the full tourism GDP impact.

The project encourages the dispersal of visitors across regions by increasing accommodation capacity in the rural community of Puketaha (i.e. outside of the Hamilton as the main urban centre). It also supports Government priorities to grow tourism exports and employment in tourism and hospitality. The tourism offerings align well with Tourism New Zealand's international marketing themes, which for 2026/27 include food and beverage, active escapes (e.g. running, hiking, golf) and wellness.

Minister's signoff



Hon Louise Upston

Date 20260625

Minister for Tourism and Hospitality

Hon Tama Potaka

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



25 June 2026

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

Tēnā koe Minister Bishop,

Invitation to comment on the Awanui Links project under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on the **Awanui Links** project under section 17 of the Fast-track Approvals Act 2024.

I have considered the application and its alignment with my portfolios as Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report prepared by the Ministry for the Environment.

Nāku noa, nā

A handwritten signature in blue ink, reading 'Tama Potaka'.

Hon Tama Potaka

Te Minita mō Te Arawhiti me Te Minita Whanaketanga Māori
Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

Hon Tama Potaka

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



25 JUN 2026

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

Tēnā koe Hon. Bishop

Thank you for your invitation to comment on the fast-track consent application for the Awanui Links project in Waikato District. The proposal is for a 123-hectare mixed-use development comprising a golf course, 30 rural-residential lifestyle lots, around 140 retirement village units, a central care facility, light industry, and a solar farm.

Waikato District is projected to continue experiencing strong growth, particularly in its main urban areas. Total dwelling demand is projected to increase by around 58 per cent between 2020 and 2050, with demand for urban dwellings increasing by around 90 per cent over the same period. Additional dwelling capacity of the kind proposed by this project would help meet this demand.

A range of matters would need to be considered if the project proceeds to the detailed consenting stage. These include the site's location on highly productive land, the potential presence of peat soils and associated subsidence risks, and infrastructure requirements. Councils are likely to identify issues relating to wastewater, drinking water, and stormwater servicing for the site, and may also raise issues with cross-boundary infrastructure funding.

These are significant matters but can be worked through by the expert panel with councils if the project proceeds. Accordingly, I have no objection from the housing portfolio perspective to the project being referred to the next stage. Thank you again for the opportunity to comment.

Mauriora,

A handwritten signature in blue ink, reading 'Tama Potaka', with a large, stylized flourish at the end.

Hon Tama Potaka
Associate Minister of Housing

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

Project name	Awanui Links
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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)	Department of Conservation (DOC)		
*First name	David		
*Last name	Greaves		
Postal address			
*Contact phone number	027455 3355	Alternative	
*Email	Fast-track@doc.govt.nz ;		

2. Please provide your comments on this application

Comments follow overleaf.

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

Manager's signoff

Jenni Fitzgerald

17th of June 2026

Director-General of Conservation s17 comments

Project name	Awanui Links
Applicant name	Swordfish Projects Limited
Application number	FTAA-2604-1216
Project summary details	To establish a mixed-use development in the Waikato District that integrates tourism, lifestyle living, retirement accommodation, and light-industrial activity around an 18-hole championship golf course.

1. General comment

- 1.1.1. As the Project includes an approval under a specified Act for which DOC is the administering agency (being the Wildlife Act 1953), the applicant was required to notify DOC in accordance with section 11 of the Fast-track Approvals Act 2024 (the 'FTAA' or the 'Act').
- 1.1.2. In relation to this application, the applicant took steps to engage with DOC prior to lodging. A meeting between DOC and the Applicant occurred on the 10th of March 2026 wherein the Applicant provided an overview of the Project, including preliminary plans and a high-level ecological assessment. DOC provided a formal pre-lodgement consultation summary to the Applicant on the 13th of March 2026.
- 1.1.3. 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.
- 1.1.4. DOC is not aware of any reason the Project should not be referred.

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 therefore targeted 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 for assessing referral applications 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. Section 21(3) and (4) set out when the Minister may/must decline a referral application. DOC has considered these criteria and comments as follows:

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) of the Act. 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	DOC considers that there is adequate information to evaluate the Project in terms of a referral decision.
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; • Marine and Coastal Area (Takutai Moana) Act 2011.	DOC has not identified any inconsistency with any relevant settlement or other obligation. Relevant Treaty Settlement Acts are: • Ngāti Hauā Claims Settlement Act 2014 • Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010
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 Wildlife Approval should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Based on our knowledge of the existing environment and species expected to occur on the Site, our understanding of the Project, and our experience of the kinds of design measures and conditions that could be implemented, DOC considers that once more detailed information is available, it would be possible to achieve a project with the imposition of conditions (that are appropriate, enforceable, include best management practice, and apply the relevant ecological management plans, as and where

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Section	Criteria	Comments
		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 for which DOC is the administering agency have been identified.

2.1.5. Section 22 sets out the criteria for the Minister for accepting a referral application. DOC has considered these criteria and comments as follows:

Section	Criteria	Comments
2(1A)	Is there a relevant Government Policy Statement	No Government policy statements have been issued under s10A.

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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?	A Wildlife Act approval 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 DOC Statutory Planning documents are relevant to the Proposal: • Conservation General Policy 2005 ('CGP'); • Waikato Conservation Management Strategy 2014. The Proposal is not inconsistent with the relevant statutory planning provisions. However, consideration should be given to: • Maintaining and restoring the ecological integrity of relevant ecosystems and habitat types; • Conserving any threatened and at-risk species to ensure their persistence; • Protecting freshwater fish habitat, fish passage and the maintenance of habitat connectivity and water quality of any waterway.

22(b)	Any other matters the Minister may consider as relevant?	• The Applicant has determined a Wildlife Act approval is required to handle, capture and relocate salvaged lizards, if discovered on-site, including any accidental killing. Assessments should be undertaken to confirm lizard presence and mitigation needs and relocation in preparing the potential substantive application. • Long-tailed bats are common within the Hamilton Ecological District, and likely to visit the Project site. Artificial lights at the Project site could interrupt and negatively affect the behavioural patterns of these Threatened – Nationally Critical – species if it is not adequately mitigated.
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3. Other considerations

3.1.1. Given the lack of specific detail in the referral application, DOC considers it would be highly beneficial for the Applicant to engage further with DOC as it relates to any conservation approvals (as well as conservation matters subject to RMA consideration) prior to making any substantive application. Benefits include ensuring information necessary to support decision-making with respect to conservation approvals is included; supporting the management of any actual and potential adverse effects on the environment; and early identification and resolution of any issues.

4. Matters for the Minister to specify (s27)

4.1.1 None identified.



Jenni Fitzgerald
Fast-Track Applications Manager

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

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Date: 17th of June 2026

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

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

Project name	Awanui Links - Reference FTAA-2604 -1216
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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 District Council		
*First name	Donna		
*Last name	Tracey		
Postal address	Private Bag 544, Ngaruawahia 3742		
*Contact phone number	0800 492 452	Alternative	027 614 3315
*Email	Donna.Tracey@waidc.govt.nz		

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

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

Managers signoff



William Gauntlett

Acting Chief Executive

Date 18 June 2026

18 June 2026

Stephanie Frame
Manager, Fast-track Operations
Ministry for the Environment
referral@fasttrack.govt.nz

Dear Stephanie Frame

FAST-TRACK PROPOSAL: Awanui Links - Reference FTAA-2604 -1216

Thank you for inviting Waikato District Council (WDC) to provide written comments on the Referral Application for Awanui Links.

Please find attached staff response and general comments regarding the proposed subject site.

Should you have any queries regarding the content of this document please contact Donna Tracey, Cross Boundary Growth Manager
Donna.Tracey@waidc.govt.nz.

Kind Regards



William Gauntlett
ACTING CHIEF EXECUTIVE
WAIKATO DISTRICT COUNCIL

Mandatory Comments

Council, under section 17(3) of the Act and without limiting any general comments under subsection (17)(3)(b), provides comments advising on the following matters:

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

No such applications exist for the properties identified in the referral application.

General Comments

1. The Awanui Links – Puketaha site is located within the Waikato District at the corner of Telephone Road and Holland Road and is currently zoned for rural purposes. The proposal therefore sits outside areas previously identified for urban development through current strategic planning documents (including the Future Proof Strategy, the Waikato Regional Policy Statement, and Waikato 2070), and existing transport modelling associated with the Waikato Expressway has generally reflected non-urban land use patterns in this location.
2. The site is located within a rural environment, and its development presents an opportunity to consider how land use outcomes respond to accessibility, servicing, and impacts on the surrounding rural environment.
3. Recent analysis undertaken through the Future Proof Retirement Living Report (October 2025) highlights that demand for retirement living can be accommodated within a range of locations, including existing urban areas and established settlements with access to services and community infrastructure. This provides useful context for considering how the future residents in the proposed retirement village have accessibility, access to services and the long-term community outcomes.
4. Development on Highly Productive Land brings with it important considerations around land use efficiency, infrastructure provision, and long-term sustainability. These matters will need to be balanced alongside the objectives of the proposal and assessed accordingly.
5. The presence of peat soils remains a challenge in parts of our district. Further assessment will be needed to understand how potential effects, including

subsidence and construction constraints, are managed through design and development approaches.

6. Waikato Regional Council's information indicates a high probability of acid sulphate soils across much of the site. This highlights the need for appropriate investigation and management approaches to address potential environmental and infrastructure effects.

7. The site connects directly to Telephone Road/State Highway 1B, which is classified as a Regional Arterial Road and a Primary Collector within the One Network Road Classification. The existing speed environment is 100 km/h, which provides context for access and network integration considerations. Telephone Road is currently managed by NZTA, with potential future changes to network ownership subject to wider network planning processes.

8. An Integrated Transport Assessment (ITA) will be important to understand anticipated traffic impacts including access requirements, trip generation and the effects on the surrounding transport network. Given the range of land use activities proposed, the ITA should consider the variety of uses and the different trip patterns across peak and interpeak periods, including weekends and event-based activity.

9. There is currently no wastewater network servicing the site this highlights the need for detailed consideration of how wastewater servicing would be achieved.

10. While there is an existing water supply scheme in the area, it is not designed to service development of this scale and intensity. The current network operates under restricted flow conditions, which limits capacity, including for firefighting requirements.

11. Early engagement with Waikato Regional Council on surface and groundwater matters will be important to identify and manage risks such as allocation limits, groundwater effects, and discharge considerations.

12. The site is located within the Waikato Central drainage scheme. Any development will need to ensure that existing levels of service within the scheme are maintained.

13. Where stormwater assets are proposed to be vested to WDC, consideration will be given to lifecycle costs and maintenance requirements to ensure long-term sustainability.

14. A change in land use at this scale will require careful consideration of effects on neighbouring properties, including reverse sensitivity and amenity effects, including for the future residents of the proposed development. If the referral progresses, engagement with adjoining landowners will be an important part of the process.

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

Project name	Awanui Links
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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		
*First name	Katrina		
*Last name	Andrews		
Postal address	Private Bag 3038 Waikato Mail Centre Hamilton 3240		
*Contact phone number	07 8590 929	Alternative	
*Email	Katrina.Andrews@waikatoregion.govt.nz		

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 comments outlined below are grouped into two sections and respond to the following matters: • Matters under section 17(3)(a) of the Act that a local authority must provide comment on (PART A); • Additional comments, under section 17(3)(b) of the Act, relevant to the proposal (PART B). <u>PART A – Section 17(3)</u> <i>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?</i> As of the date of this response WRC is not aware of any competing applications.

Insert Fast-track logo

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 – Additional comments

Section 22

WRC provides the following comments which are aimed at informing of certain matters relevant to the Minister's considerations under section 22 of the Act.

WRC considers that the only criteria of potential relevance to the project under section 22(2)(a) are whether the project:

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

(iv) will deliver significant economic benefits

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

WRC considers that the significance of the economic benefits of this project should be considered in the context of the location of the proposed development being in an unserved rural area disconnected from any urban area. While golf courses are relatively common within rural areas, the creation of a large-scale mixed-use development, including 70 rural-residential lots, a retirement village, visitor accommodation and light industrial development in this location does not align with the Future Proof Strategy, the Waikato Regional Policy Statement (WRPS) (particularly Change 1), or the accessibility requirements for a 'well-functioning urban environment' as defined by the National Policy Statement on Urban Development 2020 (NPS-UD).

Rural-residential development on highly productive land results in the permanent loss and fragmentation of regionally significant soils and potentially imposes inefficient infrastructure and servicing costs on councils. Allowing residential and rural residential development on highly productive land, undermines strategic growth planning and diverts resources away from existing efficiently serviced urban locations.

The above matters are further explained below.

- **Current strategic planning** - WRC considers that the project is inconsistent with criterion (x) under section 22(2)(a) of the Act relating to regional or local planning documents.

The Future Proof Strategy¹ 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 for the sub-region. The Strategy aims to manage growth in a staged and coordinated manner. It has a compact and concentrated approach to growth, with future development focused in and around key growth areas that are identified on the settlement pattern map. The Awanui Links site has not been identified for growth in the Future Proof settlement pattern, which is embedded in the WRPS and the decisions version of Proposed WRPS Change 1 – NPS-UD and Future Proof Strategy Update (2023)². The site is also not identified for development in the Waikato District Growth and Economic Development Strategy (Waikato 2070).

WRC considers the statement within the referral documents that *“the site sits at a strategic interface between Hamilton City’s eastern urban edge and the surrounding rural landscape within the Waikato District”* is not an accurate description of the site’s location in a spatial planning context. The site is located approximately 6km east of the Waikato Expressway, which currently represents a clear boundary for urban growth to the east of Hamilton. The relevant strategic planning documents do not anticipate urban development to the east of the Expressway in this location; therefore, the proposal has potential to lead to urban sprawl into a rural area which is not otherwise anticipated to be developed for urban purposes.

- **Housing capacity** - the Future Proof Housing Development Capacity Assessment 2023 (HBA)³ identifies sufficient plan-enabled residential capacity across all time periods (1-30 years) in Waikato District and Hamilton City but notes a short-medium term (1-10 years) insufficiency in serviced residential land and reasonably expected to be realised capacity. However, that issue equally applies to this site (i.e. it is not serviced by infrastructure). There are also significant areas of housing 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 around the periphery of Hamilton (excluding the rural-residential and retirement living proposed in this project) propose a total of approximately 394.5ha of additional residential land. Given that the Future Proof Strategy already provides sufficient housing supply for 30 plus years, there is a risk that further residential developments will merely redistribute housing demand. This also has cumulative impacts in relation to infrastructure and servicing.

Any substantive application for the proposal should provide further information that addresses whether there is demand for the rural-residential and retirement living, as well as the light industrial, components of this proposal in the short, medium and long term.

- **‘Well-functioning urban environment’** - WRC considers that the proposal does not align with the creation of a ‘well-functioning urban environment’ as defined by the NPS-UD. The site is located within a rural area, approximately 10km from urban and neighbourhood centres in

¹ Our strategic direction | Future Proof

² Proposed WRPS Change 1 is currently in the process of being made operative.

³ Future Proof Residential Housing and Business Assessment December 2023

Hamilton. While some facilities are proposed to be provided on-site for retirement village residents and visitors to the golf course and tourism facilities, residents (including of the rural-residential lots) and visitors will likely need to travel to urban centres such as Hamilton for most essential services. As there are no public transport or walking and cycling connections from the site to Hamilton, residents and visitors will be reliant on private vehicles to access these services.

Future Proof has recently undertaken a review of retirement living options in the Future Proof area⁴. This review provides context for considering new retirement living proposals, including those in rural areas. The report concludes that “retirement housing should be close to services particularly health and public transport”.

Any substantive application should provide further information that addresses the suitability of the location for this proposed development and how it will contribute to the creation of well-functioning urban environments.

- **Highly productive land** - the site meets the transitional definition of ‘highly productive land’ under the National Policy Statement for Highly Productive Land 2022 (NPS-HPL), with the entire site comprising Land Use Capability (LUC) Class 2 soils based on NZLRI mapping. The relevant clauses of the NPS-HPL are 3.8 – *Avoiding subdivision of highly productive land*, 3.9 – *Protecting highly productive land from inappropriate use and development*, and 3.10 – *Exemption for highly productive land subject to permanent or long-term constraints*. Further assessment will be required within any substantive application to demonstrate whether the proposal is able to meet these clauses.

Waikato Regional Policy Statement

Te Ture Whaimana o Te Awa o Waikato

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

Urban form and development

As noted above, the proposal is inconsistent with the Future Proof Strategy settlement pattern, which is embedded in the WRPS and the WRPS Change 1 – Decisions version. Specifically, Map 43 within WRPS Change 1 depicts the Future Proof indicative urban and village enablement areas. As the subject site is not identified as an urban enablement area on this map, the proposal represents an unanticipated development. Given this, a number of specific provisions from the WRPS are relevant to the proposal and should be assessed in any subsequent substantive application. In particular, this includes Policy UFD-P11, Policy UFD-P14, Method UFD-M5, Method UFD-M49, Appendices APP11 – General development principles, and APP13 – Responsive planning criteria (out of sequence and unanticipated developments).

⁴ Future Proof Retirement Living Report December 2025

Soil and Land Use Capability Assessment

Any substantive application will need to assess the project against the relevant clauses of the NPS-HPL. WRC notes that the Desktop Soil and Land Use Capability Assessment provided as part of the referral application states that *“Taking soil properties, wetness limitations, and subsidence risk into account, the Site is best suited to pastoral systems, with careful management required to maintain soil structure, minimise subsidence, and optimise productive use.”*

The report also suggests that occurrence of farm tracks, shelterbelts, and drains (which the report classes, together with curtilage and areas of disturbance, as ‘non-productive land’) *“causes internal fragmentation, which severely reduces the cohesion and spatial continuity of the remaining productive area. This isolation limits the land's potential for intensive, single-purpose uses, thereby lowering the overall long-term productive capacity.”* WRC staff do not agree with this assessment, particularly in the context of pastoral production (e.g. dairy farming) where farms tracks, drains, and shelterbelts are essential or typical farm infrastructure for this type of farming system. Assessing these features as ‘fragmenting’ the productive land and lowering its overall long-term productive capacity does not make sense in this context.

These matters will require further assessment as part of any substantive application process.

Peat soils

The entire Awanui Links site is situated on organic (peat) soils⁵. Further drainage of these peat soils for development of the site will likely lead to further ground surface subsidence as the de-watered peat consolidates and breaks down (oxidises). Ongoing ground surface subsidence is likely to present significant and ongoing challenges for construction and infrastructure development at the site. The longevity and functioning of services (e.g. buried water pipes) and infrastructure may be limited and disrupted due ground surface subsidence. Additionally, oxidation of the peat will also likely result in further carbon dioxide emissions to the atmosphere.

Any substantive application will need to provide further information on how adverse effects associated with the presence of peat soils on the site will be addressed and mitigated. WRPS policy 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”* is relevant to the proposal.

Ecology

The site contains potential habitat for birds, long-tailed bats and copper skinks. Bats and copper skinks have been recorded within 5km of the site. Any substantive application will need to include appropriate surveys and assessments in relation to birds, bats and lizards.

We request that further information on freshwater impacts of the proposal, including in relation to the National Policy Statement for Freshwater Management 2020 (NPS-FM), be provided as part of any substantive application. This includes further assessment in relation to the following:

- Wetland classification - the classification of all on-site watercourses as artificial drainage canals is overly simplistic. In landscapes such as the Komakorau peat system, where artificial drainage has replaced natural wetland hydrology, drainage channels are more appropriately

⁵ S-Map Online

considered highly modified natural systems rather than wholly artificial features and should be assessed accordingly.

- Fish survey and interpretation - there is a lack of reporting regarding methods used in the fish survey.
- Downstream and cumulative effects - the assessment is largely site focused, whereas the site drains to the Komakorau Stream and ultimately to the Waikato River. Risks identified do not fully address changes to hydrology and flow regimes in relation to ecology or the loss of foraging fish habitat at higher flows.
- Amount of loss – the proposed reconfiguration of substantial portions of the existing drainage network should be explicitly assessed, including the implications for hydrology, connectivity and function.
- Mitigation strategy - fish salvage is considered insufficient as a primary management strategy. The proposed reliance on stormwater treatment wetlands as mitigation or offset for the loss of existing drainage systems is not well supported ecologically.

Land drainage and flooding

The project site is located within WRC's Waikato Central Land Drainage Scheme, which includes several rural drains in and around the development area. The level of service for open drains and culverts of this scheme is generally to drain water from a 10% AEP rainfall event within three days. This is intended to remove ponding from rural areas prior to pasture damage occurring, rather than to prevent inundation. Impacts of discharges from the proposed development on the rural land drainage system need to be addressed.

As the site is within a drainage scheme, there is likely flood susceptibility. We recommend a comprehensive two-dimensional flood model is required for this site as part of any substantive application, incorporating both current conditions and projected future scenarios, including the impacts of climate change. This modelling should inform appropriate use of the site including minimum floor levels for potential dwellings while also providing a clear understanding of flood frequency by assessing a range of rainfall events.

The model must evaluate the effects of the proposed development on downstream and adjacent drainage areas, particularly in terms of changes to land use and land drainage patterns. To ensure accuracy and reliability, the modelling must encompass the entire catchment rather than a limited portion, enabling a full assessment of cumulative impacts on the drainage network and the site.

Transport

The main transport planning issue in relation to this proposal is the likely reliance on private vehicle travel. The site currently has limited realistic alternatives to private vehicle access, with no strong public transport provision nearby and no external walking or cycling infrastructure on Telephone Road. This creates a risk of long-term car dependency unless alternative transport options are considered early.

We recommend the following further information be provided as part of any substantive application to demonstrate whether transport effects can be appropriately managed:

- A full Integrated Transport Assessment.
- Undertake sensitivity testing of trip generation assumptions, including whether the Australian and international benchmarks used are appropriate for the Waikato context.

Insert Fast-track logo

- Assessing event-based, weekend and seasonal travel demand, particularly for golf, hospitality, visitor accommodation and event activity.
- Develop a transport staging framework with clear triggers for updated assessment, monitoring and mitigation as each development stage proceeds.
- Future-proof the site for alternative modes, including safe internal connections, potential external active mode links, demand-responsive transport, retirement village transport, visitor shuttles or shared mobility options.
- Clarify how the development will manage heavy vehicle routing over time and whether reliance on behavioral compliance is sufficient.
- Assess whether transport demand management measures could reduce private vehicle reliance, such as travel planning, shuttle services, shared vehicle options, visitor transport information, and internal mobility services.
- Ensure that access planning protects the strategic and resilience role of Telephone Road/SH1B.

Other relevant considerations

In addition to the above comments, we highlight the following points for consideration in relation to effects of the proposed project and further information that would be required as part of any subsequent substantive application.

Stormwater

WRC notes the groundwater levels are very high in this location so a significant amount of dewatering would be required to enable many of the proposed activities to occur. This would involve both temporary and permanent diversion and takes.

The proposed stormwater management design provided in the referral application is highly conceptual at this stage. Given the high groundwater and presence of low gradient rural drains, volume retention from new impervious surfaces will be essential.

Water supply

The applicant advises water supply from a council connection is not feasible for the development, and therefore WRC expects a number of consents would be required for the proposal as follows:

- to construct a bore or bores;
- to take groundwater via a bore or bores;
- to divert water within the site in terms of water management during and after construction;
- consent may be required to take surface water via a rainfall runoff harvesting approach; and
- consent may be required to dam water in ponds situated in off-stream areas.

The applicant advises that rainfall runoff harvesting is being investigated as the supply source for all four components of the development; rural residential, industrial, the retirement village and golf course/events centre. Greywater from the events centre is being considered to irrigate the golf course to lower overall water demand.

Detailed design work will be required to determine and support consent requirements as part of a substantive application including a detailed hydrogeological assessment to ensure the potential effects of the proposed activities are appropriately understood and managed.

Wastewater

WRC understands the proposal is to construct four small scale decentralised wastewater treatment plants (WWTP) with dispersal systems to service each of the components of the development. Each WWTP will require a detailed design supported by an assessment of effects of discharging treated wastewater to ground to support discharge consent applications under Waikato Regional Plan Discretionary rule 3.5.7.7.

Geotechnical

Given that the proposal incorporates a range of residential development, including retirement living for naturally vulnerable residents, and is sited upon geologically young, soft and unstable swamp deposits overlying unconsolidated subsurface strata known to liquefy, in relatively close proximity to an active fault⁶, we recommend that the overall seismic hazard is more thoroughly investigated as part of any substantive application. At a minimum, a Level B liquefaction susceptibility assessment should be undertaken, to better understand the actual ground conditions underlying the site.

Earthworks

The majority of the 108ha property is low lying flat farmland. WRC assumes the earthworks will be conducted in stages as the mixed-use development progresses. The earthworks will be required to be carried out in accordance with best practice and undertaken with appropriate erosion and sediment control measures to ensure potential adverse effects are avoided or minimised. WRC recommends earthworks are undertaken during the summer earthworks season to reduce the potential for the discharge of sediment into receiving farm drainage system. WRC also recommends the staged earthworks are undertaken in accordance with detailed Erosion and Sediment Control Plans to minimise any effects beyond the property boundary.

Acid Sulphate Soils

The applicant's assessment confirms there is a high probability of acid sulphate soils occurrence on the property based on the WRC Acid Sulphate Soil probability layer⁷. 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. WRC recommends the applicant undertakes a more in-depth assessment to confirm the presence of acid sulphate soils and to develop a management plan for these soils.

Potential HAIL Sites

The applicant has undertaken a preliminary site investigation to identify any HAIL activities across the property and has identified several sites given the farmland historical use. WRC understand that the applicant will undertake a more targeted investigation of identified HAIL areas to define the extent of contamination and inform appropriate management and remediation measures prior to earthworks. Overall, the approach is considered appropriate for this stage; however, further investigation will be required to adequately address potential contamination risks.

⁶ While not yet listed in the NZAFD, the Kukutaruhe and Te Taitua O Wairere Fault Zones strike within at least approximately 6.5 km of the site and are included in the publicly accessible NZ Community Fault Model - NZ Community Fault Model

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

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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.

Overall WRC considers that:

- The proposal is inconsistent with criterion (x) under section 22(2)(a) of the Act relating to regional or local planning documents.
- The proposal does not align with the creation of a 'well-functioning urban environment' as defined by the NPS-UD.
- There is unlikely to be demand for the rural-residential and retirement living, as well as the light industrial, components of this proposal in the short, medium and long term.
- The site comprises highly productive land; further assessment against Clauses 3.8-3.10 of the NPS-HPL will be required.
- Further assessment is required in relation to the NPS-FM.
- Further information needs to be provided as part of any substantive application to demonstrate whether transport effects can be appropriately managed.

Managers signoff

A handwritten signature in black ink, appearing to read 'AM d'Aubert', written in a cursive style.

AnaMaria d'Aubert

Manager – Regional Consents

Date 23 June 2026

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Attachment A

