

Memorandum

To: Antonia Croft – Ministry for the Environment
From: Sam Le Heron and Fraser McNutt – Barker & Associates Limited
Date: 7th April 2026
Re: SL1 Houchens Development, SL1 FTAA – 2602 – 1174 – Further Information Request

Dear Antonia,

Thank you for the request for information in relation to the above, SL1 Houchens Development project. We value the opportunity to provide this further information to MFE as the application is being assessed as part of the Referral process.

We will respond directly to each of the two points raised; (request in italics)

1. *on the certainty of delivery of the project components proposed to be delivered over a 10–30 year timeframe, including the risk of changes to design and/or scope over time, and how this would impact the significant regional or national benefits of the project.*

As outlined in Attachment 2 Planning Memorandum, Attachment 4 Economic Assessment and Attachment 7 Transportation Memorandum of the lodged referral package, each technical assessment talks to the 10 – 15-year lifespan for the full development of the SL1 Houchens project. Attachment 5 Urban Design Memorandum includes within *Section 3.7 Wider SL1 Staging* an **estimated** timeline for the listed, referred or development areas (SL1 Houchens) being considered within the SL1 Consortium landholdings that we are currently aware of and how this is represented within the SL1 Growth Cell.

This *Section 3.7 Wider SL1 Staging* includes portions of SL1 Houchens stated as being within the 10 – 30-year period, however, as outlined in the Planning Memorandum and Economic Assessment, it is our expectation that SL1 Houchens could be delivered in the 10 – 15-year period, subject to interim and strategic infrastructure being suitably phased. The longer estimated period for the *Wider SL1 Staging* reflects the scale and size of the SL1 Growth Cell in the context of Hamilton.

This SL1 growth cell lifespan anticipates some external infrastructure deliverables within the immediate or wider adjacent environment. As outlined in our Planning Memorandum, these include:

- the Hamilton Southern Links (Road of National Significance – Housing Growth) project.
- The Southern Wastewater Treatment Plant (SWTP); and
- Southern Water Reservoir.

Fundamentally, SL1 Houchens development does not rely on any of the above strategic infrastructure being in place at the outset. As part of detailed substantive modelling and assessments the appropriate staging and phasing of the development, in the context of this potential strategic infrastructure will be further understood. Whilst it is anticipated that these

Barker & Associates

+64 375 0900 | admin@barker.co.nz

Kerikeri | Whangārei | Warkworth | Auckland | Hamilton | Cambridge | Tauranga | Havelock North | Wellington | Christchurch | Wānaka & Queenstown

strategic pieces of infrastructure are the likely outcomes long term within South Hamilton, there are genuine alternative options that could be explored as part of a substantive application that would not limit development until such strategic infrastructure were in place. This is standard practice for interim or alternative optioneering as part of greenfield development master planning. There would be scope as part of the referral as applied or post referral as part of preparation of a substantive application under the Fast-Track Approvals Act 2024 to further refine any such options if required.

Certainty of delivery of project components:

SL1 Houchens Development, including Stage 1 Option 1A and Stage 1 Option 1B are both anticipated prior to any of the above strategic infrastructure being delivered, subject to further detailed modelling as part of a substantive application.

Both Stage 1 Scenarios include the following, as outlined in Attachment 5 Urban Design Memorandum:

- **Stage 1 Option 1A:** circa 500 residential units (200 on Chinamans Hill Limited and 300 on Ohaupo Land Limited Partnership), 400-unit retirement village, neighbourhood commercial centre and circa 7ha of net industrial.
- **Stage 1 Option 1B:** circa 545 residential units (245 on Chinamans Hill Limited and 300 on Ohaupo Land Limited Partnership), 400-unit retirement village and neighbourhood commercial centre.

The Economic Assessment which supported the Referral recognized collectively, *“the proposal helps anchor future demand for these assets and improves their business cases by providing certainty of timing, scale, and end-users. In turn, the confirmation and staging of Southern Links, the SWTP, and the water reservoir improve the efficiency and resilience of servicing the SL1 Growth Cell. **The relationship is mutually reinforcing: the proposal benefits from access to high-capacity strategic infrastructure, while its scale and timing improve the viability of that infrastructure being delivered when needed.** (p. 24).”*

To clarify this further, whilst the SL1 Houchens development would significantly benefit from the timely establishment of the strategic infrastructure outlined above, it is not solely reliant on this to give effect to the referral sought, and the staging and phasing that would be anticipated and clarified as part of a substantive application.

The *Section 3.7 Wider SL1 Staging* and *3.4 Staging* from Attachment 5 Urban Design Memorandum, breaks down SL1 Houchens into 8 stages, this is largely to assist identification of the different components of the referral, rather than to inform the likely development sequence. It is the purpose and intent of a substantive application, of which only one would be applied for, which would carefully detail the staging sought and the alignment with key strategic infrastructure and any alternatives.

The three strategic long-term infrastructure examples outlined above each could play a defining part in South Hamilton future development, including the recognized SL1 Growth Cell, of which SL1 Houchens forms part of.

The Hamilton Southern Links (HSL) project, a New Zealand Transport Agency project, has secured pre-implementation funding for the corridor. There is an existing designation in place for the corridor, and pre-implementation work is continuing. There is currently no construction funding for this project. Within the Road of National Significance program, the HSL project is unique in that it is designed and identified to **support housing growth**. As outlined in our Planning Memorandum, it is

understood that SL1 Houchens interchange is an emerging preferred location for HSL.

In collaboration with Hamilton City Council and other stakeholders, the long-term strategic wastewater solution for SL1 Houchens, and the wider SL1 Growth Cell, is via a connection to the planned SWTP. Prior to the SWTP being operational, an interim (medium term) wastewater connection to Whatukooruru Drive (within Peacocke) is anticipated to facilitate both Peacocke growth and SL1 Houchens and SL1 Mexted wastewater in the medium term. Outside of these three significant projects, there are likely to be localized and phased upgrades within the existing and planned network, like intersection upgrades.

The rationale for presenting two staging options as part of the SL1 Houchens referral reflects some of the uncertainty associated with HSL and its implementation. Further detailed modelling and scenario sensitivity testing, e.g via the Waikato Regional Transport Model (WRTM) or similar for transportation, will occur to explore all options available for the SL1 Houchens development, in both interim and longer-term strategic contexts. This will include with and without HSL scenarios. This will ensure that any substantive application applied for will include conditions that reflect the key strategic transport infrastructure solutions and when they are required to enable a staged development of SL1 Houchens.

A key catalyst for advancement of strategic infrastructure in south Hamilton will be successful Fast Track projects commencing in a staged and phased manner, appropriately tied to infrastructure upgrades and connections.

SL1 Houchens is a significant project regionally, and nationally when considered in the context of the SL1 Growth Cell and South Hamilton environs. A suitably staged and phased SL1 Houchens development could see the fruition of the residential, retirement village and industrial components in advance of the HSL Houchens interchange (and wider HSL delivery) or in the absence of, where alternative solutions, upgrades or triggers are presented and built into conditions. The specifics of this is subject to the detailed assessments, ongoing stakeholder input and staging that will be comprehensively addressed as part of a substantive application for the SL1 Houchens development.

The SL1 Houchens Referral includes the enablement for a future water reservoir within the SL1 Houchens Master Plan. This demonstrates another example of key strategic infrastructure that is beneficial to the SL1 Growth Cell, and broader Hamilton and South Hamilton catchment. Any such trigger or requirement for this future water reservoir will be subject to detailed modelling underpinned as part of a substantive assessment. Such modelling would occur in coordination with Hamilton City and key stakeholders (IAWAI, Waikato Region etc).

The timing, delivery, interim considerations, and contributors to this and other strategic infrastructure or interim infrastructure will be progressed as part of Private Development Agreements (PDA), between relevant parties prior to substantive determinations. This ensures transparency of the requisite infrastructure and the strategic nature of this, to service large scale development.

This point is furthered through SL1 Houchens being part of the wider SL1 Consortium, who represent the vast majority of the SL1 Growth Cell (circa 70% land holding). The SL1 Consortium continues to work collaboratively together toward the shared goal of urbanization and growth cell realization within the SL1 Growth Cell. This includes a listed (Southern Links 1) and a referred project (SL1 Rogerson Block) which are both working toward substantive lodgment, in addition to SL1 Houchens. Examples include the SL1 Consortium surface water take from the Waikato River, which is being processed by Waikato Regional Council to support the existing water take demand

Barker & Associates

+64 375 0900 | admin@barker.co.nz

Kerikeri | Whangārei | Warkworth | Auckland | Hamilton | Cambridge | Tauranga | Havelock North | Wellington | Christchurch | Wānaka & Queenstown

associated with the SL1 Consortium port of the SL1 growth cell.

Fast-track Approvals Act 2024 is an important opportunity for forward planning infrastructure and development of regional and national significance. We expect that development of this scale will be suitably staged to reflect the infrastructure milestones that are required along the way. However, as presented in the SL1 Houchens Referral and as part of large-scale development, the requisite infrastructure will be phased during staged development for SL1 Houchens, however the regional and economic benefits are captured within the project lifespan.

Any perceived risk of changes to design and or scope over time.

As outlined in detail above, the HSL, SWTP and Southern Water Reservoir are significant infrastructure projects within, adjacent or near to the SL1 Growth Cell. All are anticipated to be delivered in the longer term, however the exact form, scope and phasing for this is anticipated to be realized as funding pathways and regional and national priorities continue to be refined.

For SL1 Houchens, independent of the delivery of the above three projects, the scope and land use components are not expected to change significantly. As part of detailed substantive assessments, if required and based on detailed infrastructure modelling, a more refined SL1 Houchens could be applied for. However, importantly the scope and integrity of a referral under the Fast Track Approvals Act 2024 for SL1 Houchens would be the basis for a substantive, and any variation or slight change in land use mix would be carefully considered in the context of any referred SL1 Houchens development. Outside of the immediate referral, and subsequent substantive application and determination, once construction commences, as is often the case with projects of significant scale over medium term durations, departures or variations might be required, and the underlying Resource Management Act (1991) or other relevant planning instrument, will provide adequate pathways for this for any later stage requiring further refinement.

How any change may impact on the regional or national benefits of the project.

SL1 Houchens is inclusive of 1300 residential units, a 400 unit retirement village, two neighbourhood centres and 25ha net industrial land and is a cohesively designed and informed master plan for the SL1 Houchens area. Detailed specialist investigation will underpin the exact staging and phasing of Fast Track projects, and SL1 Houchens is no different. Irrespective of which land use or area is incorporated within the first stage, the SL1 Houchens project is reflective of two landowners with a shared vision for the southern portion of the SL1 Growth Cell. The commitment to supporting and enabling key strategic infrastructure outlined above, and the locational attributes of the site, reinforce that even if considered in stages, the regional benefits of the project are significant. The integrated nature of the SL1 Houchens development site, which will be underpinned by shared infrastructure (roading, stormwater, water, wastewater) which perpetuates the integrated and full realization of the SL1 Houchens area.

As outlined previously the SL1 Houchens referral does not rely on the establishment of HSL, SWTP or water reservoir at a particular time point, however these pieces of regionally significant infrastructure are anticipated to be part of the ultimate strategic solution for Hamilton South.

As presented in our SL1 Houchens Referral, the economic benefit, scale and significance of this project highlight the appropriate flexibility in the staging and phasing of this. If referred, one substantive application will be applied for that covers the entirety of the SL1 Houchens Development which is intended to be given effect to in a staged and phased manner over the 10–15-year period identified, respectively giving certainty to the economic benefit, scale and wider

context of the South Hamilton environment.

It is acknowledged that developments of this scale and duration inherently carry a degree of delivery risk, including potential changes arising from market conditions, such as housing demand, construction costs, and infrastructure timing. However, these factors are typical of large-scale urban growth projects and not unique to the SL1 Houchens development.

The core drivers of regional benefit—namely the delivery of substantial housing supply, retirement living, employment land, and supporting commercial and community infrastructure—are embedded within the overall master-planned framework and are not dependent on any single staging outcome or specific infrastructure trigger. Importantly, early stages of development (including both Stage 1 options) deliver meaningful standalone benefits, with housing, services, and economic activity occurring well in advance of full buildout. As such, benefits accrue progressively and cumulatively over time.

While strategic infrastructure such as Hamilton Southern Links and the Southern Wastewater Treatment Plant will enhance long-term efficiency and capacity, the development can proceed in a staged manner with interim or alternative servicing solutions where required. This flexibility supports delivery by allowing the project to respond to infrastructure timing and market conditions, rather than constraining it.

The project is being advanced by experienced and well-resourced parties with a clear commitment to delivery, as evidenced by the pursuit of approval under the Fast-Track Approvals Act 2024. This, together with the integrated master planning of the site, provides confidence that any evolution in design, staging, or scope over time will not diminish the overall regional or national benefits, but instead reflects a responsive and practical approach to delivering those benefits over the life of the project.

2. *a quantified estimate of the anticipated time savings expected to be achieved through use of the Act.*

Further to Attachment 2 Planning Memorandum of the lodged Referral Package for SL1 Houchens Development, and in particular Section 1.8 *Benefit of the Fast-Track Approvals Act (2024) for SL1 Houchens*, the following context is added.

Outside of the FTAA legislation, the SL1 Houchens development would likely require a Council led plan change or developer led private plan change under the Resource Management Act (1991). Based on our experience we would anticipate a developer-led plan change to be the more likely scenario. Our expectation, based on similar scale developments in the Waikato context, would be a private plan change would take approximately 3 years. This three-year duration includes all detailed first schedule deliverables, including public notification of the private plan change, submissions, further submissions, hearings, appeals and environment court proceedings. Post private plan change implementation our expectation would at minimum, be a further 18 months of resource consents to reach physical works on site occurring (likely notified). This equates to circa 5-year RMA process duration with different consenting authorities and a site bordering two separate Water CCOs (establishing in July 2026).

Legislation	Comments	Timeframe
RMA Plan Change Process	Outside of FTAA legislation, a Council led or developer led plan change is the other pathway. Our expectation, based on similar scale developments in the Waikato context, would be a private plan change would take approximately 3 years. Including: • All detailed first schedule deliverables; • public notification of the private plan change; • submissions, further submissions, hearings, appeals and any environment court proceedings. Post private plan change implementation our expectation would be a further 12 – 18 months of resource consents to reach physical works on site occurring.	3 years for plan change 18-24 months years for resource consents Circa 5 years under traditional Resource Management Act (1991) legislation. Multiple approvals from different decision making stakeholders.
Fast Track Approvals Act 2024	Approximately 18 months, from referral being applied for, being referred, applying for a substantive and having a determination on that application that would enable commencement works on site occurring.	Total of 1.5 years under Fast Track Approvals Act (2024). One decision, one set of approvals.

Therefore, the FTAA legislation for SL1 Houchens Development would provide a **3.5-year benefit** purely in terms of time. Should any further clarifications be required, please don't hesitate to contact us further. We look forward to progressing forward with the SL1 Houchens referral application.



Sam Le Heron
Senior Associate

s 9(2)(a)



Fraser McNutt
Partner

s 9(2)(a)