

Planning Memorandum

To: Listed Projects Team – Ministry for the Environment (MfE)

From: s 9(2)(a) – Barker & Associates Limited

Date: 24 February 2026

Re: Planning Memorandum for SL1 Houchens

1.0 Introduction

1.1 SL1 Houchens Development

Ohaupo Land Partnerships Limited and Chinamans Hill Ltd, as the Applicants, have engaged Barker & Associates ('B&A') to provide planning services for the master planning, consenting and design of the project referred to as the **SL1 Houchens Development**. The conceptual SL1 Houchens Masterplan is shown in Figure 1, and contained within the Urban Design Memorandum.

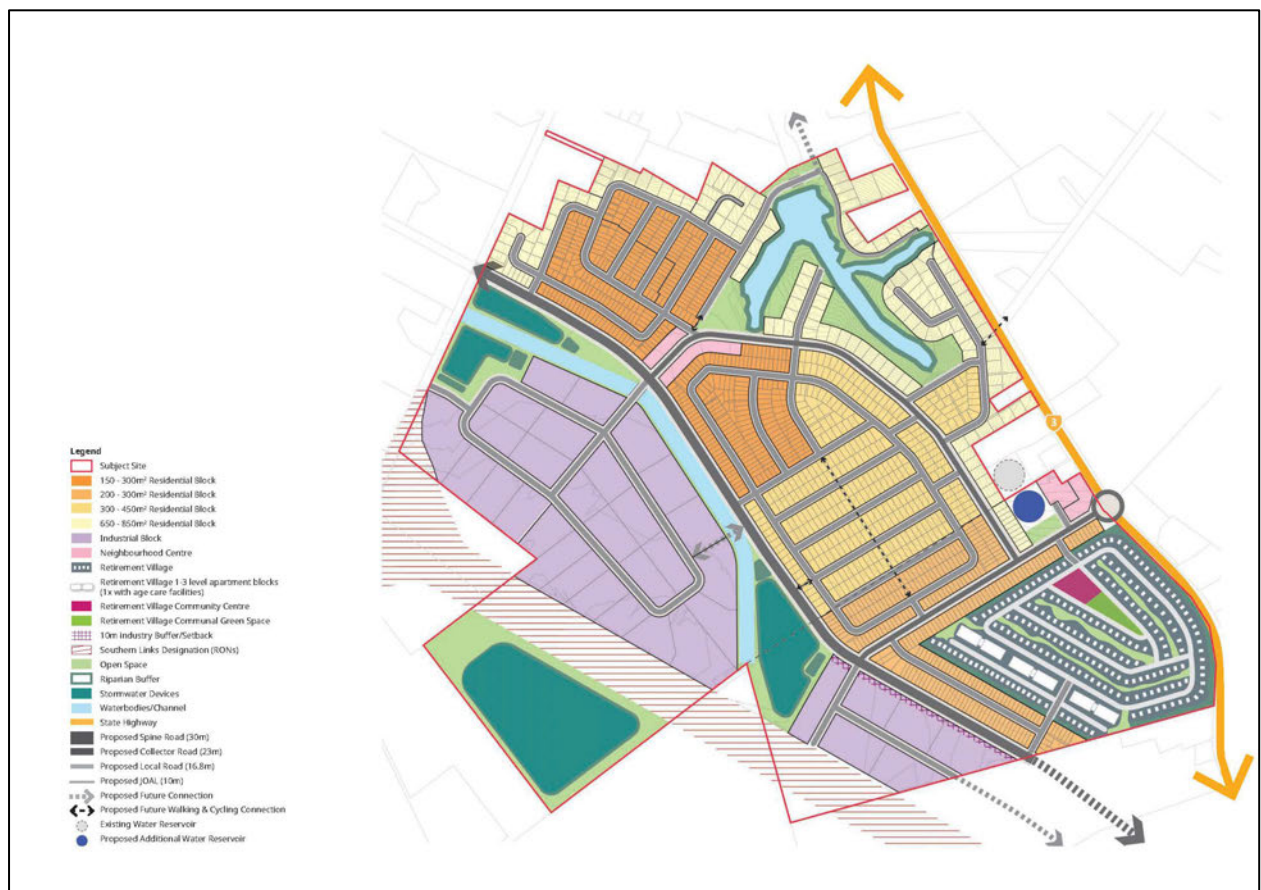


Figure 1: SL1 Houchens High Level Masterplan

Ohaupo Land Partnerships Limited and Chinamans Hill Ltd are part of a well-established group of developers involved in a consortium that has been established for some time that represent the bulk of the SL1 growth cell, recognised by Future Proof and the development community in the Waikato. Strong synergies with the

listed (SL1 Stage 1 Industrial and Stage 1 Residential) Fast-Track project exist, and the referred SL1 Rogerson Block.

The purpose of this project is to establish a new comprehensively planned residential, commercial and industrial environment. The key components of SL1 Houchens are:

- Approximately 1300 residential lots ranging from larger lots (over 600m²) and medium density lots (200m²-450m²) and higher density lots (150m²-300m²);
- An approximately 400-unit retirement village including age care facilities;
- Two new neighbourhood centres (approximately 6,500m² each) to provide for the day-to-day needs of future residents and support wider industrial employment;
- Circa 25ha of net strategic industrial land ranging from small lots (approximately 5,000m²) and medium lots (between 5,000m² and 9,000m²), to support a range of light industrial uses, no heavy or wet industry;
- An integrated greenway network with stormwater management, active mode, ecological enhancement, and passive recreation functions;
- Associated roading and three waters infrastructure; including the enablement for a future water reservoir adjoining the existing reservoir; and
- Provision for a future connection to Houchens Road adjacent to Southern Links potential Houchens Interchange. Enablement of future connectivity south and north within wider SL1 Growth cell, and not precluding the delivery of Southern Links roading project.

SL1 Houchens will be delivered through a carefully planned staged approach to align closely with infrastructure provision, and in particular stormwater and transport infrastructure, this is expanded in section 1.2 below.

1.2 Staging and sequencing

SL1 Houchens will consist of 8 stages, and further sub-stages. Each stage will deliver residential lots or superlots, or industrial lots or superlots with the required infrastructure and amenity facilities to ensure steady market absorption and continuity in development delivery. Two Stage 1 scenarios are presented in the Referral, and subject to further detailed assessment and refinement with key stakeholders and adjoining and adjacent landholdings, a refined Stage 1 will be applied for as part of a Substantive. Post Stage 1, the subsequent stages may be delivered in any order in response to market demand but tied to infrastructure sequencing. The stage boundaries will be confirmed through the substantive application process subject to detailed technical assessments, infrastructure investigations, and further design refinement.

The SL1 Houchens Development is proposed to be delivered in 8 stages, reflecting the scale of the proposal over 145 hectares and to ensure efficient and effective delivery of supporting infrastructure. Options have been explored for initial staging, snapshots of the staging plans are shown in Figures 6 and 7 below. The stages will all form part of one single substantive consent application.

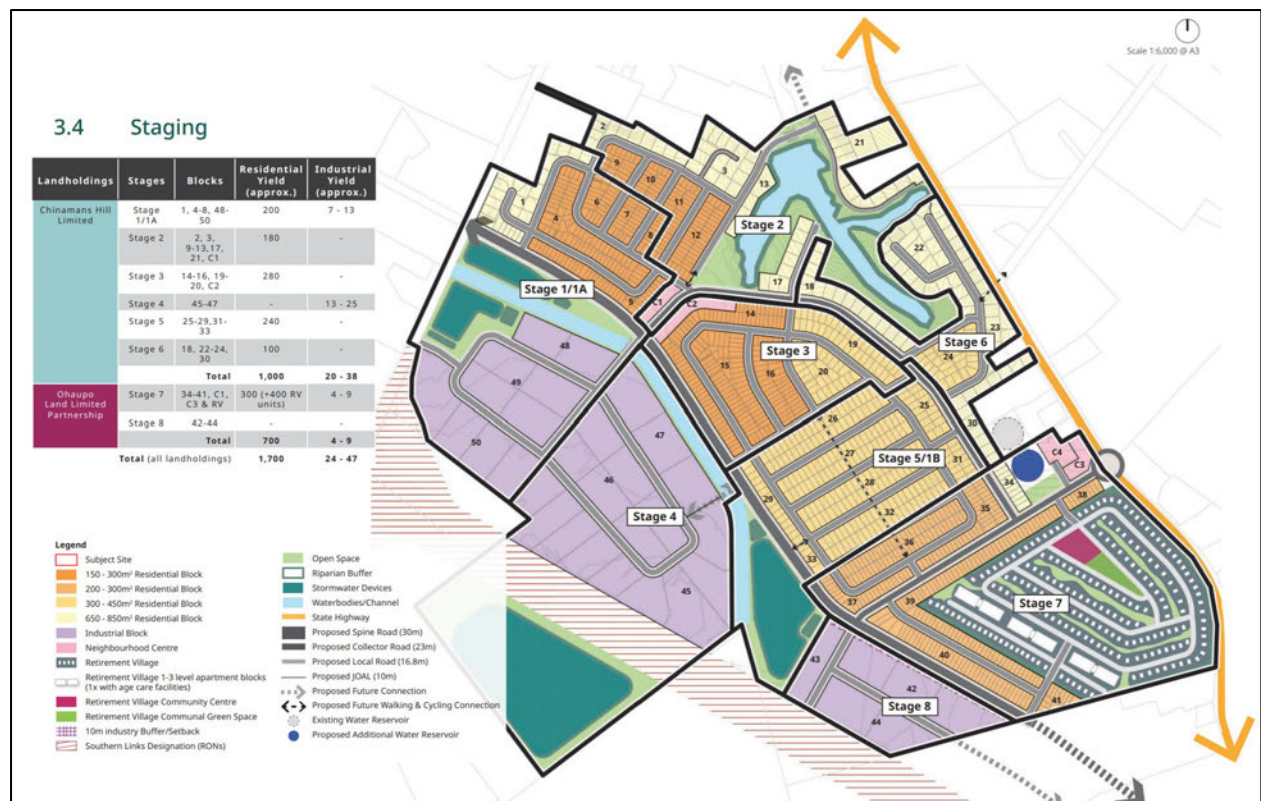


Figure 2: Proposed staging

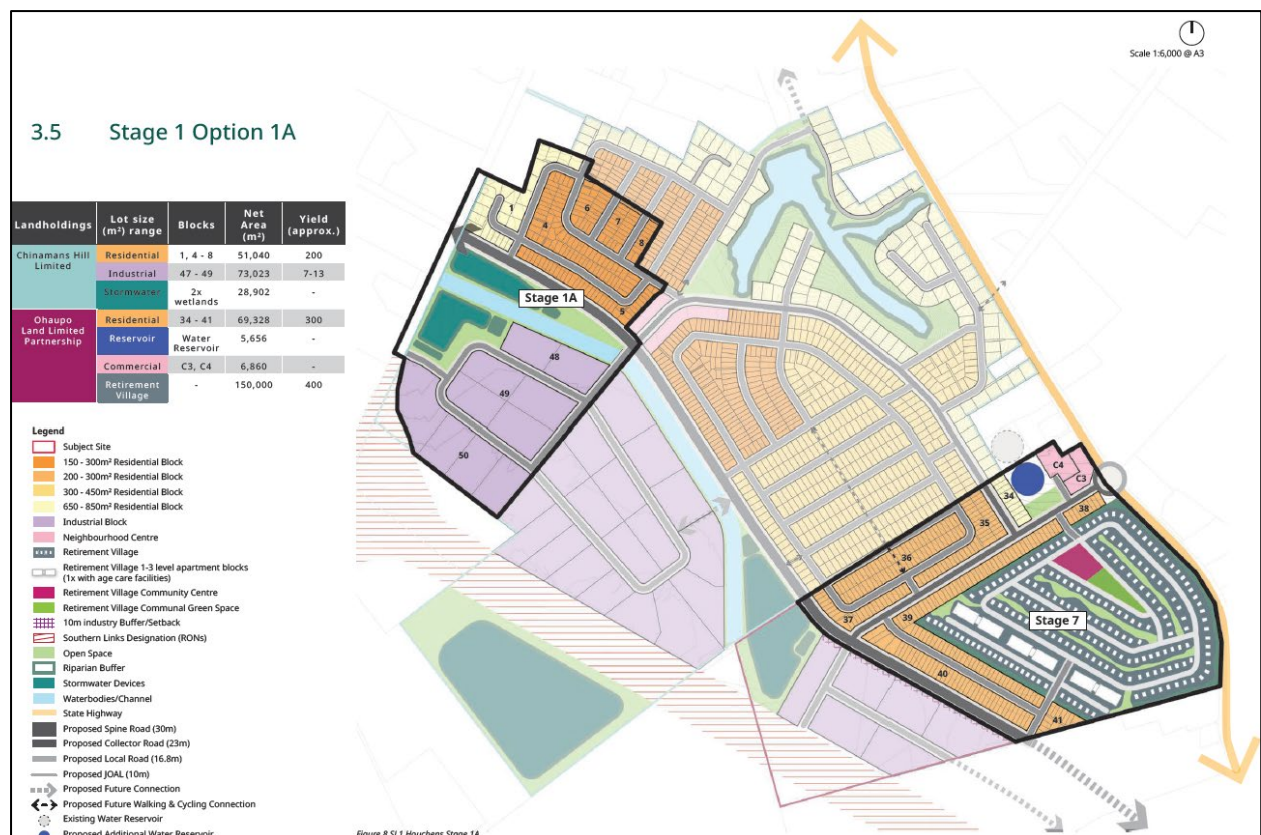


Figure 3: Proposed staging

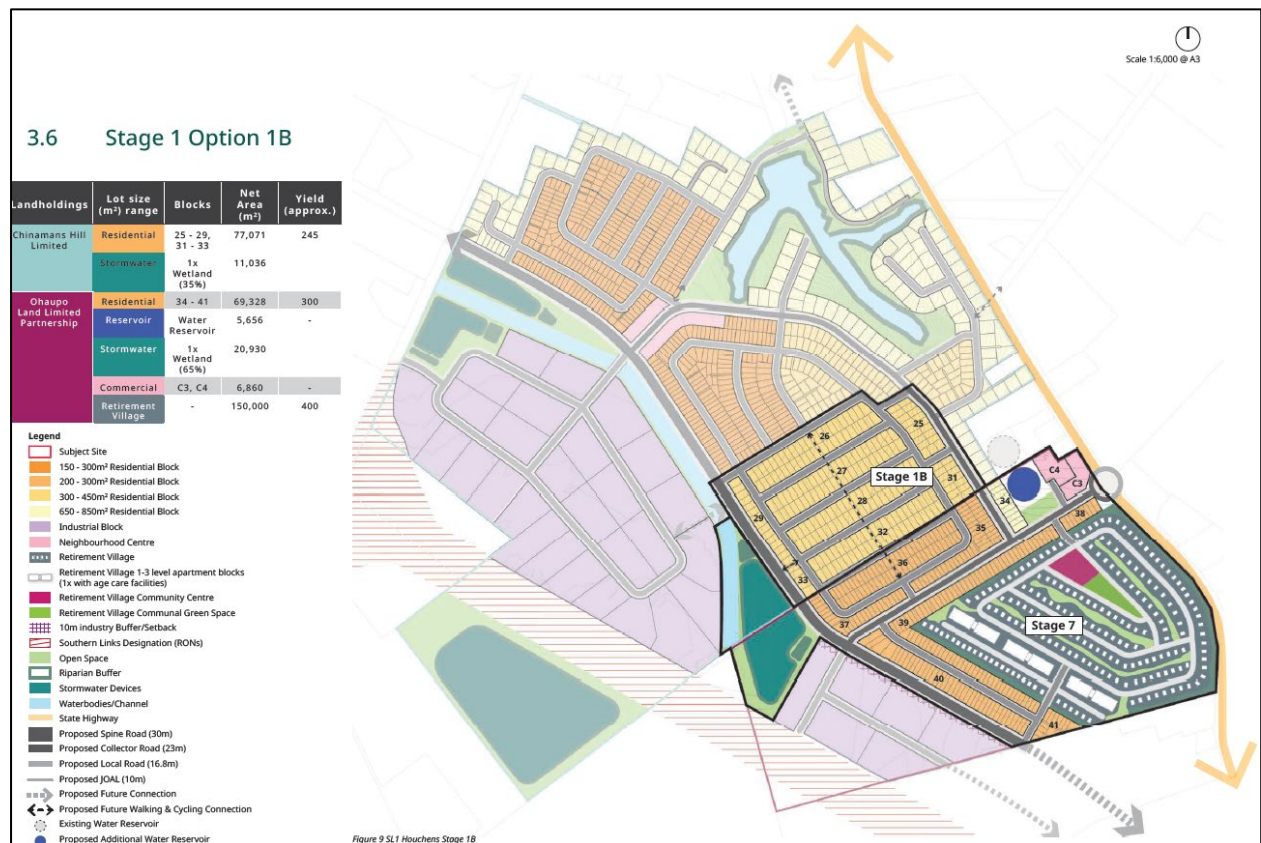


Figure 4: Proposed staging

The proposed staging is indicative only and subject to change based on detailed technical assessments, infrastructure investigations, and further design refinement. Final staging will be confirmed and determined as part of the substantive consent application.

Indicative staging is as follows:

- Stage Option 1a – approximately 200 residential lots across 5.1 hectares, 7 – 13 industrial lots across 7 hectares and creation stormwater devices, wetlands and open space and a connection to Houchens Road. This stage the development is in the western part of the site and south of Dixon Road. (Chinamans Hill Landholdings).
- Stage Option 1a - approximately 300 residential lots across 6.9 hectares, water reservoir, neighbourhood centre (commercial) of 6,860m² and the retirement village of 400 units over 15ha. Open space and a connection to Ohaupo Road (SH3). This stage the development is in the southern part of the site. (Opaupo Landholdings).

Alternatively:

- Stage Option 1b – approximately 245 residential lots across 7 hectares, water reservoir, neighbourhood centre (commercial) of 6,860m² and the retirement village of 400 units over 15ha. Open space and a connection to Ohaupo Road (SH3). This stage the development is in the southern part of the site. (Opaupo Landholdings).

The staging makes the most efficient use of infrastructure, creates a buffer between existing and planned residential and future industrial development and is informed by practicalities of delivering housing within

the Waikato (in terms of viability of each construction season). The proposed staging also supports the wider management of infrastructure and connectivity and broader delivery of the project. In determining what is considered an appropriate scale for each stage, Barker & Associates in combination with our client have sequenced and scaled the development to reflect the Waikato context.

Detailed specialist reporting will further refine the staging and sequencing and relevant infrastructure triggers, but all opportunities to develop stages in parallel will be sought where achievable.

1.3 Site Description

The Site is located within the Waipā District on the southwestern urban fringe of Hamilton City and approximately 6 kilometres southwest of the Hamilton City Centre.



Figure 5: The site (source: Emaps)



Figure 6: Looking east from Houchens Road across the grazed pasture of the site (source: Google Maps)

Positioned to the southeast of the wider Southern Links 1 ('SL1') listed development area, the site is bound to the northeast by State Highway 3 (Ohaupo Road) and the emerging residential neighbourhood of Peacocke Structure Plan Area. Directly to the north, between the site and the Hamilton residential suburb of Glenview are a mix of larger rural-residential properties accessed from Ohaupo Road, the southern end of Exeter Street, and Acacia Crescent. The western boundary is defined by Houchens Road, which provides the primary access point into the Site from the wider SL1 development area. Houchens Road also connects to surrounding rural landholdings, the future Southern Links transport corridor ('RONS') and forms a key linkage from the site to the local transport networks to the north. The Southern Links Transport Corridor bounds the site to the south and will eventually separate it from the rural land of the Waipā District as well as provide connectivity to industrial land of Frankton to the northwest. The Site for the referral application is made up of four parcels of land as listed below:

- Lot 1 DPS 84715 (approx. 43.03ha);
- Lot 1 DPS 29779 (approx. 29.33ha);
- Lot 4 DPS 59241 (approx. 30.15ha); and
- Lot 2 DP 569695 (approx. 39.2ha).

SL1 Houchens Development is owned by two landowners, Chinamans Hill Ltd and Ohaupo Land Partnerships Limited, with approximately 101ha and 40ha respectively. The Southern Links Designation extends along southern boundary.

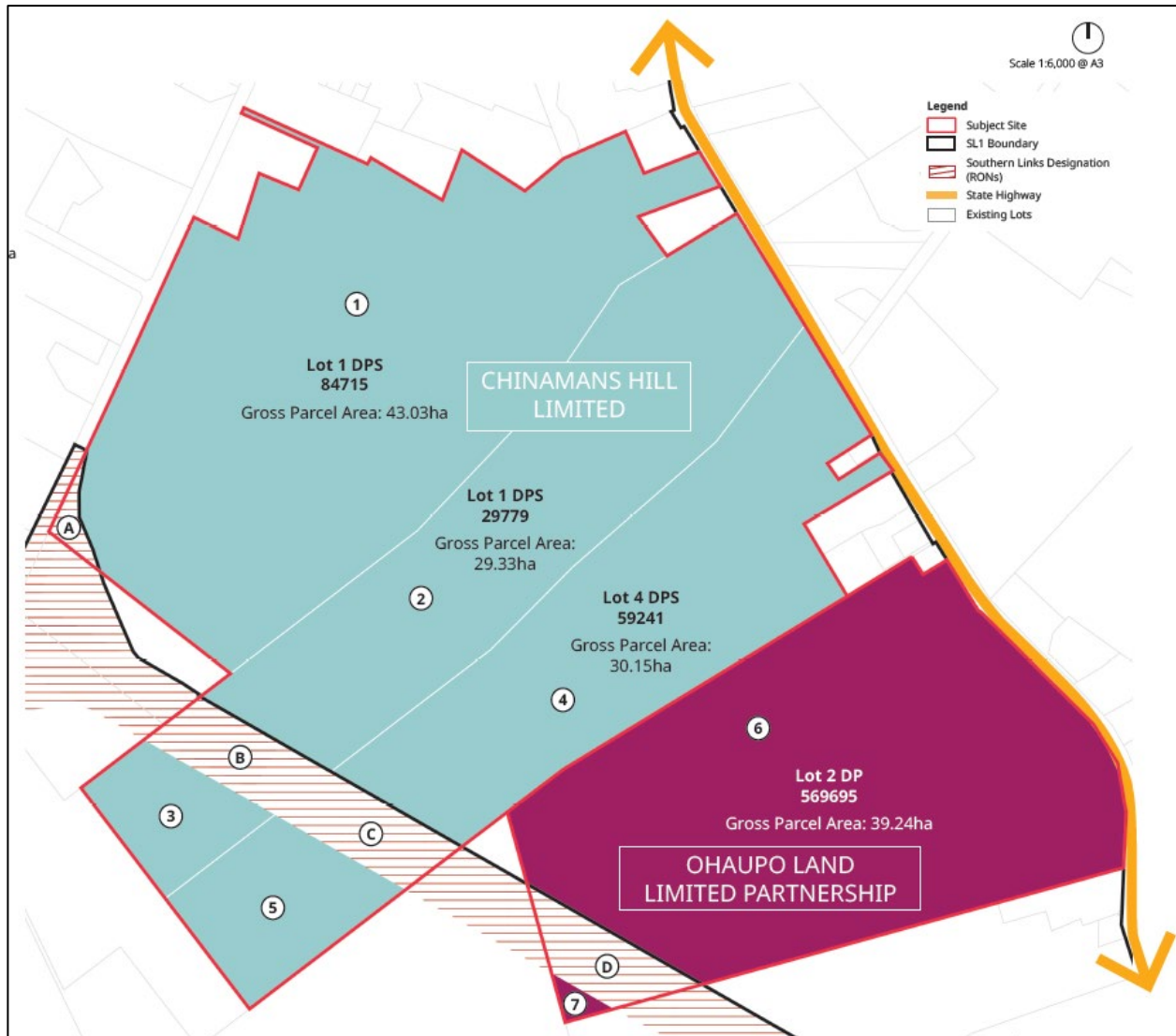


Figure 7: SL1 Houchens Development area ownership parcels.

The site can be accessed via Ohaupo Road, State Highway 3 and via Houchens Road. Ohaupo Road is a State Highway, and the location, intervention and nature of this connection will need to be explored with New Zealand Transport Agency (NZTA), and Hamilton City Council. Attachment 7 Transportation Memorandum outlines key considerations for access arrangements, including the relationship with the Peacocke Structure Plan on the eastern side of Ohaupo Road.

The topography of the landholding is predominantly flat to gently undulating, consistent with the wider Hamilton basin floor. Existing paddocks are laid out in rectilinear patterns defined by fence lines, shelterbelts, and hedgerows, reflecting long-standing pastoral use.

The predominant land use is pastoral farming, with open pasture used for grazing. Scattered rural dwellings and accessory farm buildings are limited in scale and dispersed across the Site. Vegetation is mainly exotic, comprising shelter plantings, hedgerows, and occasional specimen trees. Indigenous vegetation is largely absent, with ecological values confined to modified drains and riparian margins.

The Site reads as part of Hamilton's peri-urban fringe. To the north, the Peacocke growth area and other planned suburban expansions establish a clear transition toward urban form. To the west and south, the

Site adjoins productive farmland and rural-residential properties, while the Southern Links designation introduces a major infrastructural element that will define future access and movement patterns.

As illustrated in **Figure 2**, the surrounding land includes rural land held in pasture to the south. Established lifestyle living properties are located to the north, east, west and south, including with Croft Lane, Acacia Crescent and off Ohaupo and Houchens Roads. Urban residential development is located east of Ohaupo Road within the Aurora development and wider Peacocke Structure Plan.

Spatially, the site is well located to surrounding existing amenities and community infrastructure and wider commercial centres.

- To the north-east, Resthills Park is located approximately 1.3km to the north-west of the Site and provides recreational facilities including large open spaces and a sports centre.
- The Site is located 2km from the Glenview Shopping Centre which includes a supermarket, library and other community amenities.
- Primary and intermediate schools, tertiary education campuses, medical services and other convenience type retail are located in the surrounding suburbs of Glenview, Deanwell and Melville.
- The Waikato Hospital and Hamilton City Centre (10-minute drive).

1.4 Records of Title and Interests

The site comprises four land parcels, as outlined in **Table 1** and shown in **Figure 3**, full titles available as Attachment 1 – Records of Title.

Table 1: Land parcels

Legal description and Address	Landowner Name(s)	Approximate area (hectares)
Lot 1 Deposited Plan South Auckland 84715 and Lot 4 Deposited Plan South Auckland 59241 3102 Ohaupo Road RD 2 Hamilton 3282	Chinamans Hill Limited	73.167 ha
Lot 1 Deposited Plan South Auckland 29779 Ohaupo Road RD 2 Hamilton 3282	Chinamans Hill Limited	29.325 ha
Lot 2 Deposited Plan 569695 3134 Ohaupo Road RD 2 Hamilton 3282	Ōhaupō Land Limited Partnership	39.24 ha

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

Table 2: Relevant Interests

Legal description	Interest	Comment
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Lot 1 Deposited Plan South Auckland 84715 and Lot 4 Deposited Plan South Auckland 59241	H366027.1 Building Line Restriction	Scheme Plan No. 946 of proposed subdivision of Lot 1 DP 32503 and Pt. Land DP 32507 subject to: - o Farm gate C.P. 144 relocated 120m from northern boundary of Lot 1 – one entrance to lot. - o Entrances to 146 and 147 remain in present location. - o Building line restriction in S.110732 be reimposed.
	S61301 Building Line Restriction	Subject to a condition that no buildings or hoardings shall be erected on the said Lot within 25 links of the Hamilton – Te Kuiti State Highway 3.
	S260632 Building Line Restriction	Dedication of 25 link strip for highway widening (Lot 2 of 5.7 perches.) No buildings or hoardings are erected or rebuilt or re-erected on Lots 1 and 3 within 66 feet of the middle line of Hamilton – Te Kuiti State Highway 3.
	H929424.2 Building Line Restriction	No record was held by LINZ for this BLR, nor did a manual search of LINZ records uncover this. See correspondence in Attachment 2.
	B015226.1 Building Line Restriction	Subdivision SP1292 subject to the following condition that council reimposes the Building Line Restrictions contained in S61301, S26032, H366027.1 and H929424.2.
	H396095 Gazette Notice declaring State Highway 3 fronting Lot 4 DPS 59241 to be a limited access road	Declares a section of State Highway 3 to be a Limited Access Road.
Lot 1 Deposited Plan South Auckland 29779	H366027.1 Building Line Restriction	Scheme Plan No. 946 of proposed subdivision of Lot 1 DP 32503 and Pt. Land DP 32507 subject to: - o Farm gate C.P. 144 relocated 120m from northern boundary of Lot 1 – one entrance to lot. - o Entrances to 146 and 147 remain in present location. - o Building line restriction in S.110732 be reimposed.

Lot 2 Deposited Plan 569695	12326823.1 Consent Notice pursuant to Section 221 Resource Management Act 1991	Waipa District Council granted subdivision consent to Ohaupo Land Limited Partnership for the subdivision of Lot 1 DP 7872. Subdivision consent given to DP 569695. Conditions of consent. Subsequent development of Lot 2 Deposited Plan 569695 will require further assessment. Lot 2 Deposited Plan 569695 shall not be subdivided further pursuant to Rule 15.4.2.39 - Subdivision of a surplus dwelling the Rural Zone. The registered owner of Lot 2 Deposited Plan 569695 shall ensure any dwelling complies with Rule 15.4.2.23 of the Waipa District Plan, or any rule enacted in variation or substitution of that rule.
	Land Covenant in Covenant Instrument 12326823.3	Owner/occupier will not object to an application for a resource consent, plan change or variation by the Developer in relation to any future development of land owned by the Developer; and Support its unconditional consent to any subdivision or development to be undertaken by the Developer, or a proposed plan change or variation.
	S644906 Gazette Notice declaring the adjoining State Highway No. 3 Hamilton to Woodville via New Plymouth to be a limited access road	Declares a section of State Highway 3 to be a Limited Access Road.

1.5 Planning Context

The site is zoned Rural and Large Lot Residential under the Waipa Operative District Plan (**WODP**). The site is located within the SL1 Growth Area, which is subject to a Strategic Boundary Agreement for transfer to Hamilton City Council, **Attachments 23 and 24**, (with the exception of land south of the proposed Hamilton Southern Links designation).

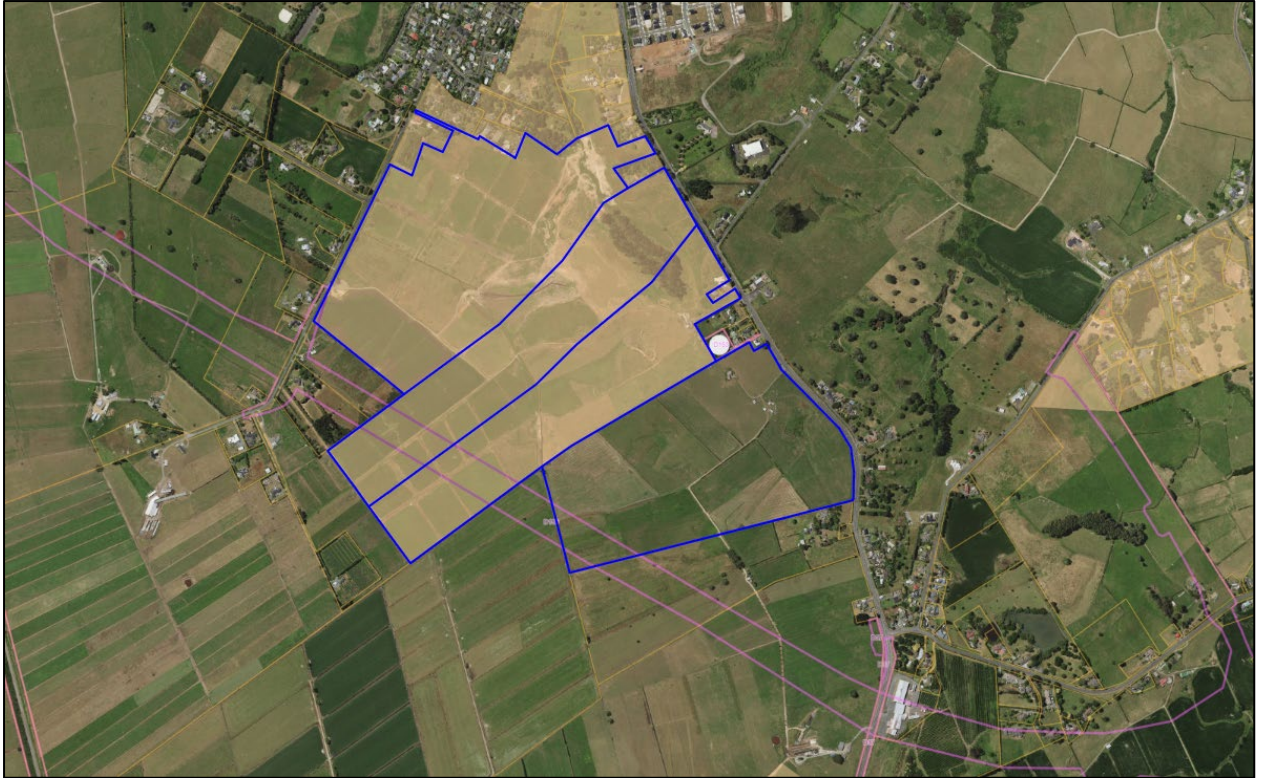


Figure 8: Waipā District Plan Map Designation D156

A New Zealand Transport Agency (**NZTA**) Designation D156/NZTA-8 is located adjacent to the southern boundary of the site, and partially over the south western corner of the site. The Site is subject to the Airport Overlays (Conical and Horizontal Surface). The site is not affected by any overlays relating to aircraft noise. This site is not subject to any other planning control or overlay as identified under the WOPD. No other planning controls or overlays are located over the site under the WODP and Waikato Regional Plan and Waikato Regional Policy Statement (**RPS**).

The zoning pattern of the site and surrounding environment is illustrated in **Figure 8**.

The adjacent land is zoned Rural and Large Lot Residential under the Waipa ODP.

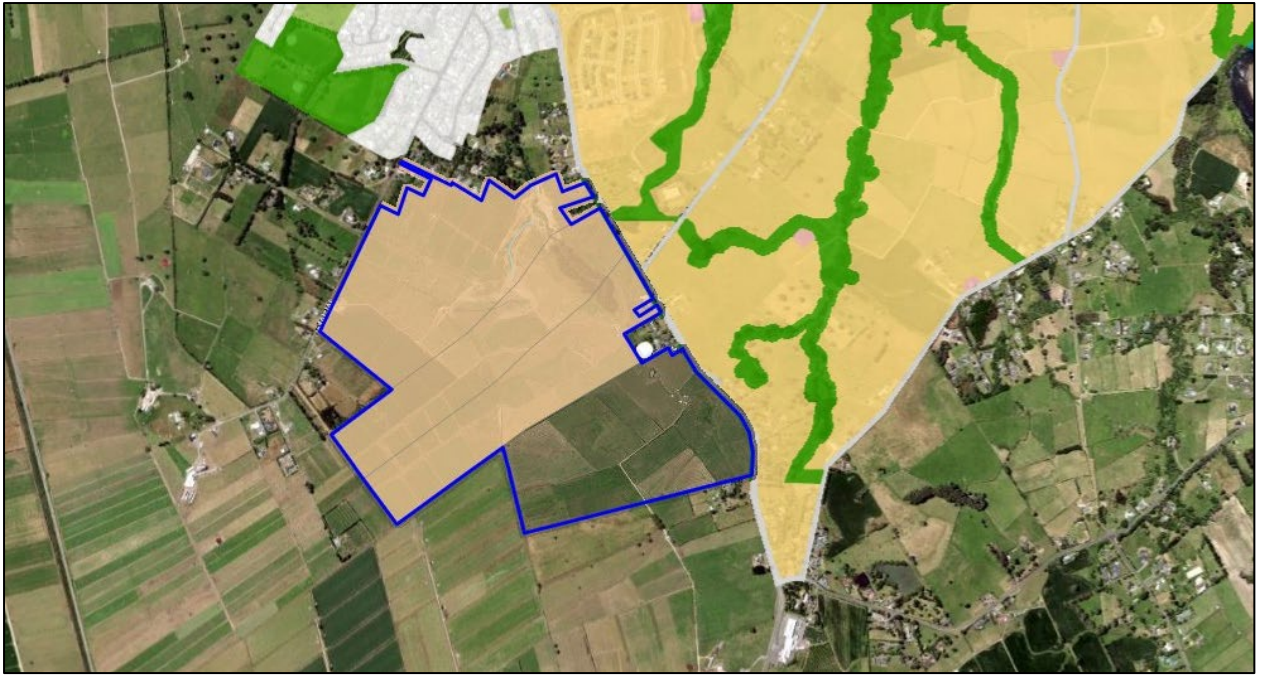


Figure 9: Zoning pattern of SL1 Houchens (WDP) and surrounding environment (HCC)

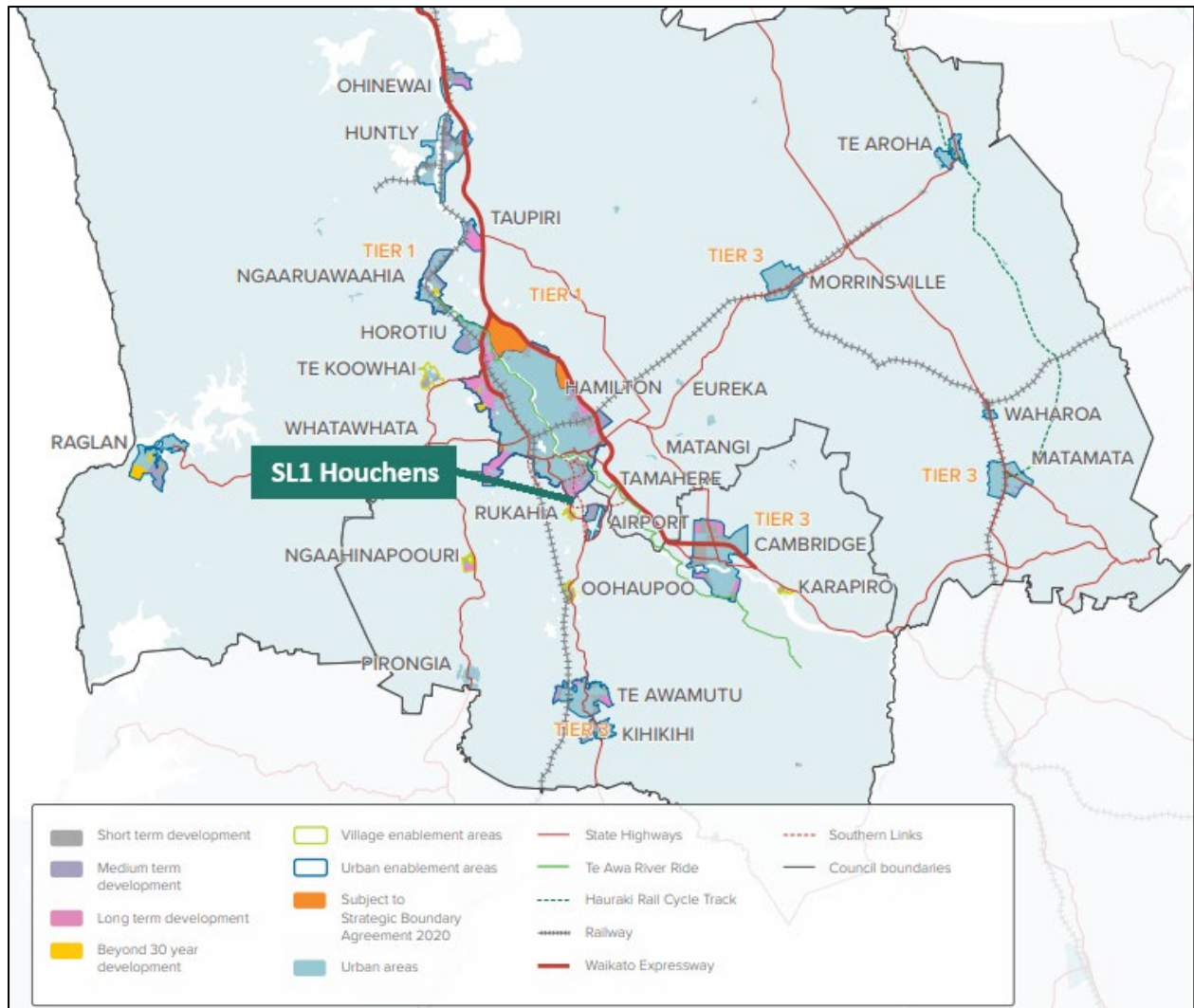


Figure 10: Approximate location of SL1 Houchens site annotated as subject to Strategic Boundary Agreement 2020 (source: Future Proof Strategy).

1.6 Strategic Context

The greater SL1 area is situated within the Waipa District and contiguous with Hamilton City Council's southern boundary to the south-west. Located approximately 3 - 4 km southwest of Hamilton City Centre, the site stretches from south Frankton to the southwestern edge of the Peacocke Structure Plan area (Plan Change 5). The SL1 Growth Cell is partially bound by State Highway 3 ('SH3') to the southeast the North Island Main Trunk Rail line ('NIMTR') to the northeast, the Hamilton Southern Links designation ('HSL') to the west and Tuhikaramaea Road on the western edge.

The site is approximately 440 ha in size. It is situated between the established Hamilton suburbs of Dinsdale, Frankton, Deanwell and Glenview to the northeast, and rural land within Waipa to the southwest. The site is currently zoned rural under the Waipa District Plan and comprises of lots in pasture, rural lifestyle, equine industry and peri-industrial use.

The Hamilton airport is located approximately 4.5 km southeast of the site and is accessible from Ohaupo Road/SH3. The site is well connected to the existing Frankton industrial activities to north and through State Highway 1c ('SH1c') are also connected to the industrial area of Te Rapa further north. Waikato Hospital is also located approximately 3km to the north.

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As outlined above, the SL1 Houchens Development forms part of a wider SL1 Growth Cell, which includes the following components:

- Strategic Boundary Agreement for transfer to Hamilton City
- Listed Project Southern Links 1 (1035 residential allotments over 48ha and 66ha of industrial land)
- Referred Project Rogerson Block, SL1 (200 residential allotments over 13ha and 28ha of industrial land), contiguous with SL1 Industrial portion
- Hamilton Southern Links (RONs), *NZTA development of 1 or more roads and associated infrastructure to support Hamilton's planned southern growth*. This includes circa \$100 million in pre-implementation funding for Southern Links.
- North Waipa – South Hamilton Spatial Study, **Attachment 25** highlights the SL1 Consortium interests and strategic significance of this area.
- Hamilton – Tauranga Corridor Spatial Study, **Attachment 24** highlights the SL1 Consortium interests in this strategic corridor, and relevance to SL1
- Hamilton Southern Wastewater Treatment Plant
- Hamilton Water Reservoir Peacocke
- Hamilton Airport

Barker & Associates, on behalf of applicants, are actively progressing a substantive application for *Southern Links 1 and Rogerson Block, SL1*, and there is strong recognition by Future Proof Partners and stakeholders of the benefit in comprehensively developing the SL1 Growth Cell. The strategic ongoing investment in North Waipa – South Hamilton is reflective of the continuous growth pressures of a Tier 1 urban authority, strategic locational benefits including the Waikato Hospital and Hamilton Airports, and both housing and employment opportunities.

Figure 11 below shows the existing Listed SL1 Stage 1 Industrial and Stage 1 Residential, and the referred Rogerson Block SL1 in the context of the SL1 Houchens Development (highlighted in red).

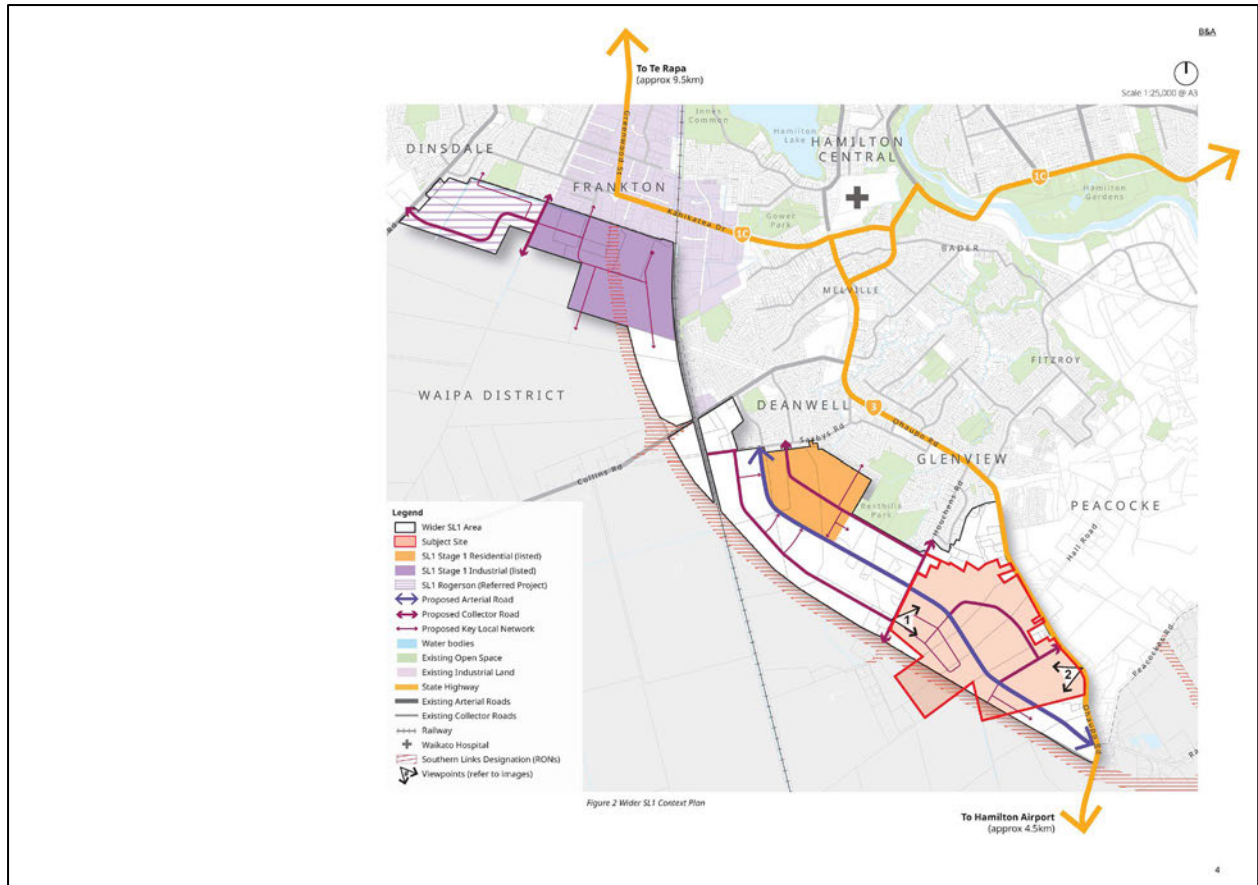


Figure 11: SL1 Concept Plan with SL1 Houchens Development and Listed SL1 Stage 1 Industrial and Stage 1 Residential, within balance of SL1 Growth Cell

1.7 Regional Significance of the Project

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

In summary, SL1 Houchens is a development project that will create economic benefits and address housing and industrial needs in terms of supply, type, and price at a scale that will provide significant regional benefits. The substantial scale of SL1 Houchens will enable approximately 1300 new homes, 400 retirement units, 25ha of net industrial land and two neighbourhood centres, contributing directly to address the identified housing shortfalls across two territorial jurisdictions within the Waikato Region, the medium term industrial shortfall across the region, and it is located within the strategic SL1 area, which includes a strategic boundary agreement for transfer to Hamilton City. Furthermore, SL1 Houchens is generally consistent with the relevant strategic outcomes identified in local and regional planning documents, including Future Proof and the Hamilton Waikato Metropolitan Spatial Plan (**Metro Spatial Plan**).

We respond to the relevant Section 22(2)(a) considerations for SL1 Houchens below.

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

While the SL1 Houchens project is not explicitly listed as a priority in a central government, local government, or sector plan or strategy, it fits well with the strategic intent and lens of the urgent need to increase housing and industrial supply in the Waikato Region. In this regard, the project aligns with the FTAA (2024) purpose of accelerating projects that deliver significant regional benefits, as set out below.

Section 22(2)(a)(ii) will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure:

As outlined in the Economic Assessment, **Attachment 4**, the SL1 Houchens project directly supports the delivery and sequencing of regionally significant infrastructure. In particular, the Southern Links transport corridor, which has been identified in the Government Policy Statement on land transport 2024-34 as a RoNS, tied to housing growth.

The SL1 Growth Cell, within which the SL1 Houchens Development is located, spatially integrates with this planned corridor. A future Houchens interchange would provide direct access to the strategic transport network. This enables efficient heavy vehicle access to the proposed industrial land and shortens freight routes to Frankton and other major industrial areas. It also improves commuter and service access for the residential and retirement components of the proposal, supporting more direct trips to employment and major centres across the city.

In addition to this direct support for the Southern Links RoNS project, the SL1 Houchens development also helps to anchor the following strategic utility investments:

- **Southern Wastewater Treatment Plant (SWTP):** The SWTP is a critical long-term investment for Hamilton and Waipa, required to service southern growth and relieve constraints on the existing Pukete plant. By bringing forward a substantial share of the future household and employment base for the southern Hamilton area, the proposal materially strengthens the case for timely investment, allows early consideration of network phasing, and provides a defined catchment at scale for infrastructure planning.
- **Water Reservoir:** The proposal includes land set aside for a strategic reservoir to support long-term potable water supply. Securing this location in advance enables network staging to be coordinated with growth and helps reduce future delivery risk and land acquisition costs.

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

SL1 Houchens will enable the delivery of approximately 1300 new homes and 400 retirement units making a significant contribution to regional housing supply. Given the location of the site within the SL1 Growth Cell, the development is well positioned to contribute to housing supply across both the Waipa and Hamilton City territorial areas.

As set out in the Economic Assessment prepared by Insight Economics and included as **Attachment 4**, residential shortfalls have been identified under the Housing and Business Capacity Assessment (HBA) within both Waipa District and Hamilton City, including:

- **Waipa District:** shortfalls across all scenarios and dwelling typologies; and
- **Hamilton City:** shortfalls of between 2,000-3,000 dwellings in the short-term and of around 4,500 dwellings in the medium term. When assessed by typology, around half of the 2,000-dwelling deficit under the HCC growth model scenario is projected to be for detached housing, of which SL1 Houchens includes circa 500 sections that are 300m² and above which can be easily achieved as singled detached housing if sought.

In addition to contributing to the detached housing shortfall, the SL1 Houchens project also includes smaller lot sizes on average. The Economic Assessment outlines that *developments like this are critical to providing a range of smaller and more affordable dwellings to meet the rapidly evolving needs of the wider Hamilton area*. The density and collocational benefits of the SL1 Houchens development, near existing social infrastructure, community nodes and employment opportunities, coupled with the diverse housing offering supports the full realisation of the SL1 Growth Cell.

With respect to housing price, Insight Economics identify that the SL1 Houchens proposal will help to foster competition in the local land market and encourage increased efficiencies and more affordable housing. Of significance, median housing prices in Greater Hamilton has more than doubled in the last decade, which has led to significant affordability issues. On average, it will take nine years to save the deposit on an average valued home.

In addition, SL1 Houchens will contribute to achieving a well-functioning urban environment. The relevant matters under Policy 1 of the National Policy Statement on Urban Development 2020 (NPS-UD) are assessed in Section 4.4 below.

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

The Economic Assessment sets out the economic benefits that will be delivered by SL1 Houchens. In summary these include:

- A one-time boost in national GDP of around \$741 million;
- The generation of up to 5,100 FTE-years (or 340 people employed full-time for 15 years); and over a ten-year period, or full-time employment for 216 people. The employment opportunities will be in:
 - **Design and consenting:** providing full time work for 6 people over the 15-year development period, generating approximately **\$9 million** in wages and salaries;
 - **Land development:** (including infrastructure provision and all other civil works) will create full-time work for 55 people over fifteen years, generating approximately **\$77 million** in wages and salaries;
 - **Residential construction:** providing full time work for nearly 200 people, with **\$246 million** paid in wages and salaries; and
 - **Non-residential construction:** providing full time work for nearly 80 people, with **\$105 million** paid in wages and salaries.
- Overall, the proposal's development is estimated to provide full-time work for nearly 340 people for 15 years, generating **\$437 million** in wages/salaries, and boosting GDP by **\$741 million**.
- Outside of the initial economic boost during development, there is significant ongoing economic benefit to outline:

- The Economic Assessment, in section 5.5, outlines the Annual GDP, Jobs and Wages for non-residential areas (at full build out). This includes the ability to sustain full-time employment for 953 people, an annual GDP of \$128 million and \$75 million paid annually in salaries / wages.
- In addition to this, Insight Economics also acknowledge the clustering of economic opportunities (industrial, neighbourhood centre, retirement village etc), will open career development, agglomeration benefits, stable year-round employment, supply-chain linkages and local workforce opportunities.
- Collectively, these effects enhance the region's employment diversity and resilience, generating tangible and long-lasting social and economic benefits within the southern Hamilton growth corridor.
- Enabling the highest and best use of the land resource, particularly given the site's location at the periphery of the Hamilton City urban area and adjacent to existing and planned infrastructure and services. The economics assessment identifies that retaining the land in its current state would forgo the opportunity to meet identified urban growth needs in a location that can support efficient service provision, reduce per-dwelling infrastructure costs, and enable more sustainable travel patterns. The economic benefits of developing the site include:
 - Urban development that is contiguous with the existing urban area of Hamilton City;
 - Maximising the value of existing and planned infrastructure investments by increasing the number of households and businesses they serve; and
 - Avoiding leap-frogging development further from the existing urban area, which has the potential to create inefficient land use patterns.
- The proposal will deliver publicly vested infrastructure, funded by the applicant, that will generate wider benefits, including new reserves and open spaces, walking and cycling links, and local roading upgrades available to use by future residents and the wider community. These amenities will create measurable uplift in property values and user benefits, and are only enabled because the proposal is a large-scale, master-planned community. By comparison, individual piecemeal projects are too small to support the delivery of this infrastructure. The infrastructure that will be delivered by SL1 Houchens therefore constitute a net benefit to the wider community.

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

SL1 Houchens aims to minimise greenhouse gas emissions where possible through construction and within the masterplan design.

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

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

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

- Multi-modal transport corridors that prioritise pedestrians and cyclists and encourages active modes of transport;

- Enabling intensified urban development, including provision for services and amenities within the new neighbourhood centres to reduce the need for vehicle travel;
- Connectivity to existing centres within the wider vicinity, including:
 - Glenview Suburban Shopping Centre (3-minute drive)
 - Waikato Hospital (6-minute drive)
 - The Hamilton City Centre (10-minute drive); and
 - Hamilton Airport (7-minute drive)
- The development of block and lot layouts which encourage energy efficiencies, including through optimising passive solar gain and natural light.

Overall, the SL1 Houchens proposal will contribute to efforts to mitigate climate change and reduce net emissions of greenhouse gases.

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

Overall, SL1 Houchens proposal is consistent with the relevant local and regional planning documents, as set out below.

Strategic Agreement on land transfer between Hamilton City Council and Waipa District Council (2023)

SL1, inclusive of the SL1 Houchens area, is identified by HCC and Waipa District Council through a Strategic Land Agreement dated 3 October 2022 as an area of land that is intended to become part of the HCC territory subject to terms to be agreed between HCC and WDC (transfer).

As outlined in the Economic Memorandum, see **Attachment 4**, *the proposal aligns with the Future Proof Strategy, which explicitly recognises the SL1 growth cell as a strategically significant area for urban expansion. Table 9 of the strategy identifies SL1 as part of Hamilton’s urban enablement area under the NPS-UD, with planned intensification supported by future public transport. Its inclusion in Future Proof, and the support it has from the development community, signals a high level of planning certainty and infrastructure readiness. This reduces delivery risk, increases investor confidence, and helps attract earlier and more sustained private sector investment. In this way, strategic recognition not only supports alignment with planning documents but also contributes to more efficient and timely economic outcomes. (p. 18).*

Further the Statement of Fact Letter, Attachment 18, acknowledges that *the wider Southern Links area, of which the ‘SL1 - Houchens’ area forms a part is currently located within Waipa District Council (and Waipa’s CCO ‘Waikato Waters Done Well’). There is agreement in principle for a Strategic Boundary Agreement (SBA) to transfer the wider Southern Links area, using the proposed route of the Southern Links Expressway as a new boundary line, from the territorial authority of Waipa to Hamilton City. This includes the Houchens part of SL1, although it is noted a small portion of the SL1 – Houchens site lies south of the proposed expressway and is not covered by the SBA.*

We consider that the SL1 Houchens proposal, and the wider SL1 Growth Cell is broadly in alignment with spatial strategies and long-term vision that is evolving in the Waikato. The strategic significance and importance of this SL1 Growth Cell will continue to be embedded as spatial strategies, and local and regional planning documents are progressed and updated moving forward. The small portion of the SL1 Houchens site on the southern side of the Southern Links RoNs is for stormwater purposes, and is not considered to fundamentally impact on the SBA in place.

This is furthered through the more recent Hamilton to Tauranga Spatial Strategy and North Waipa and South Hamilton Spatial Strategy, both which identify the SL1 Growth Cell as a key area of potential growth, see **Attachments 24 and 25** which highlight the Barker & Associates submissions on these strategies in coordination with the SL1 Consortium and wider Growth Cell appreciation.

Future Proof Strategy

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

The key relevant objectives and principles of Future Proof Strategy are:

- To support compact urban development across the sub-region, focused within the identified urban enablement areas;
- Use defined urban enablement areas to encourage a more compact urban form, to integrate land-use with infrastructure and to send clear signals to the community about the preferred settlement pattern and the scale and extent of urban development;
- Meet diverse housing needs through a range of types and safe, inclusive design;
- Ensure urban growth does not increase the vulnerability of communities to climate impacts;
- Apply environmentally sustainable and water-sensitive design principles; and
- Provide a clear definition between urban and rural areas, including through directing urban development to defined urban enablement areas and village enablement areas.

SL1 Houchens demonstrates strong alignment with these key objectives and principles as follows:

- The site is located within a ‘potential growth area for further consideration’ in Future Proof Strategy (SL1 growth cell), and will be designed to integrate with key strategic infrastructure (Hamilton Southern Links, Southern Wastewater Treatment Plant) and connectivity with the wider Hamilton urban boundary and balance of the SL1 Growth Cell. The location of the site, as well as the masterplan which includes a proportion of medium density and higher density lots, will contribute to delivering a compact urban form;
- As outlined in Section 1.5 above, the project will increase the supply of housing for a variety of housing typologies, including a significant share of detached housing typologies which is projected to have significant shortfalls in Waikato and Hamilton City. The project will directly contribute to improving housing choice and variety as well as housing affordability through increasing competition in the land market, benefiting the wider community; and
- As outlined above, the project will contribute to the reduction of greenhouse gas emissions through construction practices and elements of the masterplan design. The site is not located within a known flood hazard area, and all stormwater flows will be appropriately managed to avoid flooding and ponding effects on downstream environments. Overall, SL1 Houchens will not increase the vulnerability of communities to climate impacts.

Hamilton Waikato Metropolitan Spatial Plan (2020)

The Metro Spatial Plan is one of the strategic initiatives being delivered as part of the broader Hamilton to Auckland Corridor Plan, prepared by Future Proof. The Metro Spatial Plan recognises the important role of the metro area in the prosperity and productivity of New Zealand given the strong links to Auckland, Bay of Plenty, and the wider Waikato Region, and aims to create a metro area where people can easily access employment, education and health facilities, serviced by reliable and efficient transport connections and great places. The Metro Spatial Plan also seeks to manage significant population growth in a way that supports compact, sustainable and resilient urban development while protecting the region's natural and productive environments.

The relevant objectives and outcomes of the Metro Spatial Plan focus on:

- Improve choices for the location and type housing;
- Improve access to employment, education and services;
- Assist emission reductions and build climate resilience;
- Enable quality-built environments whilst avoiding unnecessary urban sprawl;
- Improving housing affordability and choices;
- Enhancing the quality of the natural and built environments and the vitality of Auckland and Hamilton and the communities within the corridor;
- Improving access to employment, public services and amenities; and
- Planning in an integrated way based on communities of interest rather than existing council boundaries.

In addition, the Metro Spatial Plan acknowledges the need to expand existing growth patterns in order to meet the needs of growing and changing communities. The Metro Spatial Plan recognises growth will occur through a mixture of infill, brownfield, and greenfield areas. Growth in greenfield areas is focussed on providing a high-quality and high amenity built environment that provide for a range of housing types. The SL1 Growth Cell area strengthens the role of Peacocke and Hamilton Airport (North Waipa – South Hamilton) in the southern corridor of the MSP. The SL1 Growth Cell provides an opportunity for a significant growth area located within the southern corridor, where over the growth cell represents 440ha of strategically located land, appropriate for residential, employment and wider uses.

SL1 Houchens is consistent with the strategic direction set out under the Metro Spatial Plan for the following reasons:

- As previously identified, the site is located within the SL1 growth cell, strategically located for the growth of Hamilton City. Of significance, the site is located adjacent to the Hamilton Southern Links (RoNs) project and in the catchment of the Southern Wastewater Treatment Plant and wider Peacocke Structure Plan area. This will ensure the proposal is able to integrate cohesively with existing urban form and activities while avoiding unnecessary and sporadic urban sprawl;
- As outlined above, the project will increase the supply of housing for a variety of housing typologies and contribute to meeting housing needs in Waipa and Hamilton City;
- The site is accessible to existing centres and planned business nodes, as well as existing amenities including schools, early childcare centres, libraries, community halls and parks and reserves;

- SL1 Houchens is a comprehensively and masterplanned residential, commercial and industrial development that enhances the quality of the built environment. The masterplan incorporates best practice urban design principles to provide for a high degree of on-site amenity for future residents while ensuring external effects on visual amenity and character are appropriately addressed; and
- SL1 Houchens will contribute to enhancing the quality of the natural environment. As outlined in the Ecological Memorandum, the proposal presents an opportunity to enhance ecological values through planting of ecologically appropriate plantings. The proposal will also incorporate water sensitive design approaches in the management of stormwater.

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

The Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 gives effect to the Deed of Settlement signed by the Crown and Waikato-Tainui on 17 December 2009. The Settlement Act has an overarching purpose to restore and protect the health and wellbeing of the Waikato River for future generations. Section 9(2) of the Settlement Act confirms that the vision and strategy for Waikato River (Te Ture Whaimana o Te Awa o Waikato) applies to the Waikato River and activities within its catchment affecting the Waikato River.

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

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

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

The proposed stormwater strategy for the site will be refined through detailed design, and will be discussed as part of ongoing engagement with Ngaati Wairere, Ngaati Maahanga, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Koroki-Kahukura, and Ngaati Apakura, with the support of Waikato-Tainui to ensure that SL1 Houchens supports the restoration and protection of the health and wellbeing of the Waikato River.

Iwi Planning Documents

Engagement correspondence was sent to hapū with resource management interest in the SL1 Houchens site, and Ngaati Wairere, Ngaati Maahanga, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Koroki-Kahukura, and Ngaati Apakura, and Waikato-Tainui, have confirmed their interest in being involved in this project on an on-going basis.

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

Waikato-Tainui Environmental Plan

The Waikato-Tainui Environmental Plan (**WTEP**) provides a background to, and identifies key, resource-based issues for Waikato-Tainui. The plan sets out Waikato-Tainui's vision statement for environmental and heritage issues and key strategic objectives such as tribal identity and integrity, including "to grow our tribal

estate and manage our natural resources.” The plan is designed to enhance Waikato-Tainui participation in resource and environmental management.

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

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

Regular hui with representatives of Waikato Tainui have been held regarding the SL1 Growth Cell and SL1 Houchens, and engagement will be ongoing through detailed design and the substantive application. A letter and Memorandum of Understanding for the SL1 Houchens site has been developed with hapū, including Waikato Tainui, and is included as **Attachment 17**. Overall, it is considered that SL1 Houchens will not be inconsistent with the objectives of WTEP.

Waikato Regional Policy Statement

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

SL1 Houchens is consistent and well-aligned with the following objectives of particular relevance:

- IM-O7 recognises the relationship of tangata whenua with the environment. The project supports this by:
 - Engaging with iwi and hapū with resource management interests in the site to incorporate cultural values throughout the development.
- UFD-O1 seeks that the development of the built environment occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural, and economic outcomes. The project achieves this by:
 - As outlined above, SL1 Houchens is a masterplanned residential, commercial and industrial development that will enable growth that is ordered and co-ordinated, including with transport and three waters infrastructure;
 - SL1 Houchens will create social and economic benefits, including through the provision of increased housing supply and choice and employment opportunities for the community; and
 - As further assessed in Section 5.0 below, potential environmental effects can be appropriately managed and avoided and/or mitigated.
- UFD-O2 seeks that housing bottom lines as identified under Future Proof can be met. The project supports this by:

- As outlined above, SL1 Houchens will contribute to housing supply in both Waipa District and Hamilton City, addressing identified shortfalls for housing across both the short, medium, and long terms and in particular across detached housing typologies and affordability.
- ECO-O1 requires a full range of ecosystem types, their extent and the indigenous biodiversity that they support to exist in a healthy and functional state. The project supports this by:
 - As outlined in the Ecological Memorandum and assessed in in Section 5.0 below, the effects of the SL1 Houchens development on ecological values can be appropriately managed. There will also be opportunity to enhance ecological values through new planting across the site.
- LF-O1 seeks to maintain or enhance the mauri and identified values of freshwater bodies. The project will achieve this by:
 - Providing ecological enhancement in riparian areas through new planting located within the site; and
 - Ensuring potential effects on freshwater values can be appropriately managed, including through the effects management hierarchy, as further detailed in Section 5.0 below.
- LF-O5 and LF-O6 seek to safeguard the life supporting capacity of soil resources for existing and foreseeable uses and to recognise and protect the value of high class soils from inappropriate subdivision, use or development. The project has some discrepancies with LF-O5 as outlined below:
 - The site contains extents of LUC class 2 soils, which is classified as high class soils under the Waikato RPS, and the proposal will result to the loss of this land for future primary production activities. The Waipa District Plan also defines high class soils and identifies the SL1 Houchens site as not having high class soils. This is reinforced by the Large Lot Residential zoning on the majority of the site.
 - Notwithstanding the above, the proposed subdivision and use and development of the site for primarily residential, industrial and commercial activities is not considered to be inappropriate under LF-O6 given the identification in strategic documents of the SL1 area as a growth cell. While the project will bring the sequencing of growth forward, it can be appropriately serviced by infrastructure, will integrate with the surrounding urban and rural environment, and will be located in an area earmarked for growth, underpinned by the Strategic Boundary Agreement between Waipa and Hamilton.

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

1.8 Benefit of the Fast-Track Approvals Act (2024) for SL1 Houchens

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

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

- i. would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and*

- ii. *is unlikely to materially affect the efficient operation of the fast-track approvals process.*

As outlined in Section 3.0 below, SL1 Houchens requires a range of resource consents (land use, subdivision, discharge) from Waipa District and Waikato Regional Council's, and a specific approval under the Wildlife Act 1953 for an Authority and HNZPT for an Archaeological Authority. The ability to apply for a comprehensive range of consenting requirements within one application, to be considered by one panel, offers significant efficiencies in planning and specialist inputs into managing and navigating the consenting process. The overall intent of the FTAA (2024), which is designed for regionally and nationally significance infrastructure and development projects, supports the scale and significance of SL1 Houchens. The consolidated timeframes for engagement with interested stakeholders and parties, wider consultation requirements to support substantive applications, and the overall detail required support a more timely and efficient consideration of the project.

Outside of the FTAA process, it is anticipated that the SL1 Houchens development would be subject to a challenging and complex consenting requirement that would test the current district and regional planning provisions. Our understanding of the FTAA legislation is to support regionally and nationally significant projects with a single consenting process. This would enable development commencing sooner and the economic, social and wider positive benefits to be realised sooner than under the traditional Resource Management Act 1991 (RMA) path. The FTAA process is considered the right instrument for this scale of project, and the SL1 Houchens project is not considered to materially impact on the intent of the FTAA process, more so it would reinforce the value and opportunity that the FTAA presents for regionally and nationally significant projects, and reinforces the strategically significant and contiguous nature of wider development within the SL1 Growth Cell (including Listed SL1 Residential and Industrial and Referred Rogerson Block) projects.

2.0 Experience

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

2.1 Rotokauri Greenway & Minor Arterial Fast-Track Consent

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

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

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

B&A led and supported with the following:

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

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

2.2 Current Projects under Fast-Track Approvals Act

B&A continues to be actively involved in fast-track projects. We are currently engaged across a number of listed projects, several recently referred projects, and others that we are preparing for referral in collaboration with MfE and the EPA. Our team is well-versed and highly experienced in navigating the Fast-Track Approvals process to date.

3.0 Reason for Consent

3.1 Waipa District Plan

The proposal would potentially trigger resource consent under the Waipa District Plan for the following reasons:

- Activities not provided for within the Rural Zone;
- Subdivision;
- Formation and construction of roads;
- Servicing;
- Earthworks;
- Under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011;
- Residential Activity;
- Industrial Activity;
- Commercial Activity (neighbourhood centres)
- Signage; and
- Three Waters Infrastructure & Servicing

Overall, under the Waipa District Plan, the proposal requires resource consent concurrently for land use and subdivision as a **Non-complying Activity**.

3.2 Waikato Regional Plan

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

- 3 Water Module
 - 3.3 Water Takes
 - 3.4 Efficient Use of Water
 - 3.5 Discharges
 - 3.6 Damming and Diverting
 - 3.7 Wetlands
 - 3.8 Drilling
- 4 River and Lake Bed Module
 - 4.1 River and Lake Bed Management
 - 4.3 River and Lake Bed Disturbances
- 5 Land and Soil Module
 - 5.3 Contaminated Land

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

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

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

3.3 National Environmental Standards

The proposal would potentially trigger resource consent under the following National Environmental Standards.

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

Consent is likely to be required under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 ('NES-CS').

As outlined in Appendix 12 Preliminary Site Investigation, Given the rural and agricultural nature of the site, limited information is available on past activities that may have caused soil contamination. The property has operated as a dairy farm for around 35 years, with various structures built in the 1970s. Due to their age, there is potential for localized soil contamination from asbestos-containing materials (ACMs) and lead-based paint.

Former horticultural activity has the potential to have resulted in localised soil contamination from the use of persistent pesticides and other related contaminants. Although superphosphate use is not recorded, its long-term application in dairy farming suggests a risk of cadmium accumulation in soils, particularly in the Waikato region. Additionally, the derelict milking sheds and other farm buildings constructed with suspected ACMs and used for long-term material storage may pose a contamination risk from asbestos and other sources.

While general dairy farming is not listed on the HAIL, associated activities—such farm dumps, chemical storage or waste disposal—may have occurred and can result in soil or groundwater contamination. Overall, the risk of widespread contamination is assessed as low to moderate, reflecting the sites predominantly rural land use. However, localised contamination hotspots may exist around former farm structures, chemical storage areas, and earthwork stockpiles. Targeted soil testing and validation are recommended prior to any earthworks, redevelopment, or disturbance of these areas to confirm soil quality and manage potential risks appropriately. Land use consent is required under NESCS Regulations 8(3) and 8(4), though the activity is likely permitted under the Waikato Regional Plan. A Detailed Site Investigation is required to better characterize the soils around those HAIL areas identified as well as sampling of the wider pastoral land.

Given HAIL activities have been identified on a more likely than not basis and that trigger activities are likely to be undertaken as part of the development of the site, the NES-CS will apply. Should the proposed development be unable to comply with the permitted activity criteria of the NES-CS a land use consent is required. Conservatively it is anticipated consent will be required under the contaminated land provisions of the Waikato Regional Plan. As part of a substantive application a Detailed Site Investigation (soil investigation) will be provided. This DSI will inform whether remediation and/or management is required of the soils.

The PSI confirms that the presence of any contaminated land associated with HAIL activities within the site can be appropriately managed to accommodate urban development, including through a Remediation Action Plan (**RAP**) and Site Management Plan (**SMP**).

Resource consent will be required under Regulation 10 of the NES-CS as a Restricted Discretionary Activity. On this basis, any requirements of the NESCS can be addressed as part of an application post-referral and potential risks to human health can be appropriately managed and mitigated.

3.3.2 National Environmental Standards for Freshwater Management 2020

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

A Hydrological Memorandum, see **Attachment 9**, has been prepared in support of this referral application. It is anticipated that consents could be required for 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. A full assessment of the proposal against the NES-F will be completed once design is further advanced as part of the substantive application.

3.4 Other Approvals

3.4.1 Wildlife Act 1953

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

3.4.2 Heritage New Zealand Pouhere Taonga Act 2014

Pre-lodgement consultation with HNZPT received (**Attachment 20**), concludes that based upon the archaeological assessment (**Attachment 11**) provided with the pre-lodgement consultation, and that there is a recorded archaeological site in the project area. HNZPT advice is that an archaeological authority is required to proceed before starting works on the site. For these reasons we will seek an HNZPT authority as part of the bundle of consents and approvals being sought. A full evaluation will be completed as part of the substantive application.

4.0 Statutory Planning Framework

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

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

4.1 National Policy Statement for Freshwater Management 2020

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

It is noted that the NPS-FM was amended in 2025 with respect to quarrying and mining activities. These amendments are not relevant to the proposal as no quarrying or mining activities are proposed.

Based on advice provided in the Ecological Memorandum and Hydrological Memorandum, it is considered that the project is consistent with the relevant policies of the NPS-FM that relate to land development for the following reasons:

- The SL1 Houchens Development provides opportunity for ecological restoration of an area that has low ecological value.

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

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

4.2 National Policy Statement for Highly Productive Land 2022

The National Policy Statement for Highly Productive Land 2022 ('**NPS-HPL**') ensures the availability of New Zealand's most favourable soils for food and fibre production, now and future generations. The NPS-HPL came into effect on 17 October 2022 and was amended in December 2025 to introduce interim exemptions for urban development and urban rezoning on Land Use Capability (**LUC**) Class 3 land under clauses 3.5 and 3.6. The amendments do not include any changes to the objective and policies of the NPS-HPL.

The objective of the NPS-HPL is to protect highly productive land for use in land-based primary production, however, there are exceptions to this in particular circumstances. Until such time as more detailed mapping is completed by the regional council, highly productive land is land mapped as Land Use Capability (**LUC**) 1 – 3. A portion of the SL1 Houchens Development site is mapped as LUC 2 under the Manaaki Whenua Landcare Research Mapping and therefore the NPS-HPL applies.

The entire SL1 Growth Area is identified in the Future Proof Strategy 2022 as an area for "investigation" for future urbanisation, and has a strategic boundary agreement signed between Waipa and Hamilton City Council. The development area has also been identified as an 'Emerging Growth Area' by HCC in their Hamilton Urban Growth Strategy (HUGS). In addition, it is noted that a Memorandum of Understanding (MOU) has been signed by the SL1 consortium and Hamilton City Council. In addition to this, the Chinamans Hill portion of the SL1 Houchens project is subject to a Large Lot Residential Zoning under the Waipa District Plan, and is not treated as 'rural' in that regard. This outlines an agreed timeline and process to enact a boundary agreement and bring in the SL1 area to Hamilton City. For these reasons, in our view, the SL1 Houchens Development as part of the wider SL1 area, is exempt from the mapping as per section 3.4 (2), which states: "*However, despite anything else in this clause, land that, at the commencement date, is identified for future urban development must not be mapped as highly productive land.*"

Notwithstanding this, we also consider Clause 3.6 of NPS-HPL provides a pathway for the urban rezoning of highly productive land if (a) it is required to provide sufficient development capacity to meet a demand for housing to give effect to the National Policy Statement on Urban Development 2020 ('NPS-UD'), (b) there are no other reasonably practicable or feasible options for providing at least sufficient development capacity within the same locality and market while achieving a well-functioning urban environment and (c) the environmental, social, cultural and economic benefits outweigh the costs associated with loss of highly productive land.

The Economics Memorandum prepared by Insight Economics in support of the SL1 Houchens Development outlines that there is a housing shortfall in the area and that the SL1 Houchens Development can help meet an identified shortfall in capacity. The site is part of a wider strategic growth cell known as SL1, includes a strategic boundary agreement, which reaffirms the locational attributes of the site. Should further evaluation on these three tests be required, then this can be included as part of the substantive application. It is considered that as part of a substantive application that the proposal can demonstrate that it either does not apply (3.4(2)) or that the proposal minimises and mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land and will avoid any reverse sensitivity effects.

Based on the assessment above, it is considered that there is a pathway and the project can be consistent with the NPS-HPL.

4.3 National Policy Statement for Indigenous Biodiversity 2023

The National Policy Statement for Indigenous Biodiversity (NPS-IB) ensures that protection, maintenance and restoration of New Zealand's most threatened indigenous species. The NPS-IB came into effect on 4 August 2023. It is noted that the NPS-IB was amended in 2025 with respect to quarrying and mining activities. These amendments are not relevant to the proposal as no quarrying or mining activities are proposed.

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

- This project seeks to maintain and enhance indigenous biodiversity.
- There are no mapped Significant Natural Areas on the site.
- The applicant has engaged with local Mana Whenua to recognise and provide for Hūia Te Rito in the management of indigenous biodiversity. Several options to managing indigenous species were considered to ensure a holistic and integrated approach was being undertaken.
- The proposed development will include a variety of indigenous plants and seeks to retain and enhance indigenous biodiversity, which will promote peoples' wellbeing and allow current and future communities to connect with nature.
- Indigenous biodiversity can be protected from the effects of climate change and be utilised to reduce the effects of climate change, with planting of indigenous species proposed as part of wider detailed open space creation.
- The project seeks to maintain and enhance existing indigenous biodiversity. While no Significant Natural Areas are identified for this site, any areas of significant indigenous vegetation or significant habitat of indigenous fauna identified during the further development of this proposal will be appropriately managed.

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

4.4 National Policy Statement on Urban Development 2020

The NPS-UD (amended 2022) ensures New Zealand's towns and cities are well-functioning urban environments that meet the changing needs of our diverse communities. It removes overly restrictive barriers to development to allow growth 'up' and 'out' in locations that have good access to existing services, public transport networks and infrastructure.

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

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

- The SL1 Houchens Development will deliver an integrated, multi-functional development that includes around 1,300 residential units and 400 retirement village units, of varying housing types, locations and prices in a connected and accessible location.
- The most recent Housing and Business Capacity Assessment identifies that there are capacity shortfalls for industrial in the short-term, medium-term and long-term for Hamilton. This proposal will contribute to alleviating that shortfall in an adjoining location.
- The proposal enables people to provide for their social, economic and cultural wellbeing, with the site being accessible to nearby services, amenities and employment areas within wider Hamilton City.
- The site layout will encourage and promote active transport through a range of walking and cycling options from housing to nearby employment, schools, community services and open spaces.
- The project takes into consideration climate change, particularly through the stormwater management provided by the stormwater ponds, wetlands and basins, and incorporates measures to support the reduction of greenhouse gas emissions (such as mode transport infrastructure).
- The project is well suited to the local area and is strongly aligned with delivering a well-functioning urban environment that reduces climate change through providing infrastructure and services in an integrated manner.
- A geotechnical desktop review is included within the Infrastructure Memorandum that accompanies this application. The Infrastructure Memorandum concluded that the SL1 Houchens Development should be suitable for the intended development but does present some geotechnical challenges and should therefore be supported by a detailed geotechnical investigation and earthworks management. Recommendations are also made with respect to engineered fill and building foundations.
- The Infrastructure Memorandum supporting this referral application confirms that the proposed development can be appropriately serviced with three waters infrastructure.

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

4.5 National Policy Statement for Natural Hazards 2025

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

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

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

A preliminary flood assessment has been carried out by Maven, included in **Attachment 3**. The post-development model shows that the majority of new lots will be located outside of the 1 per cent floodplain. The preliminary assessment has also identified post-development design parameters for water surface levels and flow rates. The assessment confirms that subject to future development achieving these parameters, there will be no adverse downstream effects from the proposal. It is anticipated that additional investigation and detailed design will be undertaken as part of the substantive application to refine the design solution;

A preliminary geotechnical assessment has been undertaken by CMW at **Attachment 13**, indicating that natural hazards on the site are likely to include liquefaction, static settlement, and slope instability. The report identifies the potential for ‘high’ liquefaction hazard within parts of the site and identifies that detailed design will need to include considered measures and other mitigation factors. The report also identifies that the risk of global or large-scale slope instability is ‘unlikely’, and that while settlement may be triggered by future buildings, mitigation measures can be implemented to reduce the potential impacts;

The site is located outside of the Coastal Environment and is not considered to be susceptible to coastal erosion, coastal inundation, and tsunami natural hazards; and

Based on these preliminary investigations, it is considered that SL1 Houchens will enable ‘very high’ natural hazard risk to be avoided as part of future subdivision, use, and development. Other levels of risk can be managed proportionately through detailed design measures that will be refined as part of the substantive application.

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

4.6 National Policy Statement for Infrastructure 2025

The National Policy Statement for Infrastructure 2025 (**NPS-I**) provides national direction under the RMA to guide the efficient development, management, and upgrading of infrastructure across New Zealand. The NPS-I provides for infrastructure. While the SL1 Houchens application is not for an infrastructure activity, it

includes ancillary three waters infrastructure to service development, and it is anticipated that the proposal will not be inconsistent with the provisions of the NPS-I.

4.7 National Environmental Standards for Air Quality 2004

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

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

The management of dust and odour will be addressed in the Construction Management Plan and an Erosion and Sediment Control Plan that will form part of the substantive application. As such, ambient air quality will be maintained once the SL1 Houchens Development is constructed.

Based on the assessment above, it is considered that the project is consistent with the NES-AQ.

4.8 National Environmental Standards for Freshwater 2020

The NES-F sets standards to regulate activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the project are provisions which prohibit works in and around natural wetlands. Resource consent may be required under the NES-F as works are proposed in and around potential natural inland wetlands.

Potential natural inland wetlands have been identified on the site with the extent to be determined by further ecological investigation, however this may relate to vegetation clearance and earthworks within or around natural inland wetlands, drainage of natural inland wetlands, and loss of natural inland wetlands.

A further evaluation against the NES-F will be included in the substantive application. Offsetting and compensation, if appropriate, can be assessed as part of a further Ecological Assessment that would be included as part of a substantive application.

4.9 New Zealand Coastal Policy Statement

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

5.0 Assessment of effects

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

5.1 Construction effects

5.1.1 Contaminated Land

A desktop assessment concludes that there may be isolated hotspots associated with current and former buildings containing asbestos containing materials and the storage of small quantities of fuel and chemicals. It is considered that this can be mitigated through remediation prior to earthworks commencing on site.

5.1.2 Earthworks

Earthworks for the project will be carried out in accordance with best practice appropriate erosion and sediment control measures to ensure potential adverse effects are avoided or minimised. Earthworks are proposed to be carried out during the summer earthworks season to reduce the potential discharge of sediment into receiving waters. Any potential adverse effects are able to be mitigated and managed via an Erosion and Sediment Control Plan.

5.1.3 Dust

During construction, it is anticipated that there will be dust generated by the earthworks and land disturbance. Dust effects are able to be mitigated and managed via an Erosion and Sediment Control Plan.

5.1.4 Construction noise and vibration

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

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

5.1.5 Construction traffic

It is anticipated that there will be potential adverse traffic effects as a result of the construction of the SL1 Houchens Development.

Construction traffic effects will be temporary and will be managed in accordance with a Construction Traffic Management Plan ('**CTMP**'). The CTMP will outline measures such as anticipated number of truck movements per day and truck routes (among other measures) to ensure that the potential construction traffic effects of the project are appropriately managed. The bulk of construction and related earthwork traffic movements will be kept within the site constraints and have little impact wider afield.

5.2 Archaeology

An Archaeology Assessment has been prepared by RedOx. There are no natural heritage overlays that apply over the site; however, the Archaeological Assessment of Effects has confirmed that the site contains a recorded archaeology in the form of a drain associated with the early European settlement of Hamilton (S14/510 – pending), it is recommended that an Archaeological Authority to modify/destroy application be made. Pre-lodgement consultation with HNZPT has indicated that an application for an Archaeological Authority, with supporting archaeological assessment, is recommended, and as part of preparation of a substantive application this will be commenced. In addition to any outcome of the Archaeological Authority,

the adoption of best practice accidental discovery protocols will form part of conditions of consent as part of the substantive application. See HNZPT letter as **Attachment 20**.

5.3 Infrastructure and servicing

An Infrastructure Memorandum, **Attachment 3**, has been prepared and appended to the referral application. The Infrastructure Memorandum sets out how the proposed development can be appropriately serviced. Based on the advice in that memo, there are not considered to be any significant adverse effects in relation to infrastructure and servicing.

- **Stormwater:** stormwater drainage can be provided for SL1 Houchens through wetlands, ground water recharge, piped stormwater networks and conveyance channel. Overland flow paths will be managed through the development, and it will reduce any potential flooding risks. An overarching stormwater strategy has been developed, and this sets out the high-level, best practice approach for stormwater management within the catchment. A new public stormwater network will be created to service the site and control stormwater flow, and will include stormwater ponds designed to mitigate flows up to the 10-year ARI event. The ponds will also provide stormwater water quality treatment, and will be designed in accordance with the Waikato Regional Infrastructure Technical Specifications (**RITS**) and other relevant technical standards.
- **Water Supply:** Potable water can be provided for SL1 Houchens through water supply networks through the development and connection into the existing network. A potential new water reservoir may be constructed next to the existing southern water supply reservoir, to provide water supply to SL1 Houchens and wider SL1 development. If the existing network cannot provide sufficient capacity for the initial stage of the development, private water bores will be established at strategic locations and onsite portable water treatment devices will treat the water before distributing within the development. In addition, as outlined in the Hydrology Memorandum (Attachment 9) outside of the Fast Track consenting process a surface water take from the Waikato River is being applied for to support the wider SL1 Growth Cell. This underpins the range of options available to be progressed as part of a detailed substantive application.
- **Wastewater:** Similar to water supply, Maven has investigated options for reticulated wastewater management as well as a decentralised system and confirm that both options are feasible. Connection into the reticulated network will be supported by a combination of new pump stations and gravity networks, dependent on the catchment location and site topography. Should capacity constraints within the reticulated network be confirmed through detailed design, a decentralised treatment plant will be proposed to provide for treatment in the interim, prior to downstream public network once able.

Overall, the Engineering Memorandum confirms that the site can be adequately serviced. It is also anticipated that as part of detailed engineering design (if referred), the SL1 Houchens development will investigate strategic infrastructure servicing options with the SL1 Residential Stage 1 (which forms part of the same SL1 Growth Cell and southern catchment). Maven is providing engineering expertise for both projects, and a more strategic approach is anticipated. Therefore, it is considered that there will not be any significant adverse effects in relation to infrastructure and servicing.

5.4 Groundwater

A hydrogeological assessment, **Attachment 9**, has been prepared by WGA to assess potential effects on groundwater resulting from earthworks and on-site infrastructure, as well as potential new water supply bores. WGA's preliminary assessment confirms that those activities which have the potential to interact with groundwater are well understood and can be appropriately managed through detailed design to avoid adverse drawdown, mounding, and discharge effects. Based on regional hydrogeological data, site specific assessment, and data from comparable nearby developments, WGA conclude that there is no indication of significant constraints that would prevent the development from proceeding.

5.5 Transportation

A Transportation Memorandum, **Attachment 7**, accompanies the referral application. This memo details the local roading approach as well as how the SL1 Houchens Development can integrate with the wider transport network.

The proposed development will generate vehicle trips on the local and state highway network that have the potential to affect the safety and efficiency of the transport network. The Transportation Memorandum has estimated trip generation for SL1 Houchens Development (including Stage 1 Options 1A and 1B), Stage 1 Option 1A is projected to generate approximately 5% more daily trips than Stage 1 Option 1B due to its proposed industrial land use component.

The Transport Memorandum outlines infrastructure requirements to support the sites redevelopment, including an upgrading of the existing Ohaupo Road/Houchens Road intersection to accommodate the increase in trip generation, and a new 3-arm roundabout connection on Ohaupo Road (SH3) and connection to Houchens Road via the proposed 30 m wide Spine Road. The memorandum also recommends that industrial activities proposed in SL1 Houchens Development are reliant on the Southern Links possible Houchens interchange, or require access out onto Ohaupo Road at the 3-arm roundabout. This is reflected in the staging scenarios presented. The remaining section of the Spine Road between Chinamans Hill Limited's land and Ohaupo Land Limited Partnership's land is to be constructed as part of Stage 1 to provide this option and ensure that access to the northern residential and industrial development areas is provided via the proposed new roundabout intersection on Ohaupo Road (SH3). No industrial traffic is proposed to utilise Houchens Road north up to Ohaupo Road.

In addition, the Memorandum recommends in combination with the shared walking and cycling path or protected bi-direction cycleway and footpath being provided within the proposed Spine Road, that the walking and cycling shared path or a protected bi-directional cycleway and footpath be extended northwards on Houchens Road to connect to the existing paths on Ohaupo Road (SH3). Safe system crossing points can be considered on Houchens Road such that this route will support and encourage active modes as a first and last mile connectivity to public transport.

Considering the Transportation Memorandum and that further detailed assessment and mitigations will be developed as part of the substantive application, it is considered that transport effects can be appropriately avoided and mitigated.

5.6 Character & Amenity

Part of the site is currently used for farming activities and is in pasture. The surrounding area is a mix of rural and peri rural residential. Due to the site's proximity to the urban fringe of Hamilton, there is an opportunity to integrate with the surrounding mixed character.

As discussed below, the proposal will need to be carefully designed to integrate with the mixed character context of the area, with a focus on the transition from urban to rural as well as providing buffers between existing and proposed residential and the proposed industrial development.

An Urban Design Memorandum has been prepared by Barker & Associates (**Attachment 5**) and includes an assessment of the urban design aspects of the proposal and conceptual masterplan. The Memorandum includes identification of potential effects associated with the proposed street network and block structure, density, built form, and future building typologies, the neighbourhood centres, industrial activities and the provision of open space. The findings of the Urban Design Memorandum are summarised below:

- Undertake further technical assessments to ensure infrastructure, ecological, transport, geotechnical and topographical considerations are coordinated with urban design outcomes.
- Proposed development controls should allow for residential dwellings with a massing that can appropriately respond to the surrounding private and public realm and achieve an appropriate degree of residential amenity. Matters to be considered include overshadowing, outlook, passive surveillance, space functionality, solar orientation, privacy and indoor-outdoor connections.
- Develop a comprehensive design guide to ensure high-quality architectural and landscape design outcomes. The design guide should at the minimum include the consideration of visual massing, scale, façade, fencing and landscaping, and design responses to the frontages and streetscape interfaces. The design guide is to ensure that quality urban design and landscape outcomes are maintained during the development and lifetime of the subdivision.
- Implement clear guidelines for interface treatments, emphasising landscape buffers, acoustic controls, and carefully considered transitional zones, to ensure coexistence between differing land uses.
- Ensure that the SL1 Houchens development actively coordinates and aligns with the wider SL1 area, enabling cohesive planning and consistent implementation of infrastructure, transport networks, ecological corridors, and land-use strategies to deliver a unified and comprehensive urban outcome across the entire SL1 development.

In conclusion, subject to the recommendations outlined above, the SL1 Houchens proposal represents an appropriate urban design response to support residential, industrial and commercial growth at the urban boundary. It is considered that potential urban design adverse effects can be appropriately managed and mitigated through integrated urban design, and that the SL1 Houchens Development is supported from an urban design perspective.

5.7 Landscape

B&A have prepared a Landscape Memorandum, **Attachment 6**, that details the landscape and visual effects of the proposed development and how the SL1 Houchens Development can integrate within the environment. This memorandum concludes while the SL1 Houchens development presents unavoidable

changes to character, amenity, and cultural values, the effects can be significantly moderated through careful planning, context-sensitive design, and ongoing collaboration with mana whenua and community stakeholders.

5.8 Cultural

Mana whenua engagement has occurred in the preparation of the referral application for the SL1 Houchens Development, in addition to the wider SL1 Growth Area. A tangata whenua working group, facilitated by Wayne Te Kerei Harris (Pouwhenua Consultancy Ltd) (representing the Ngaati Wairere Taiao Trust on behalf of the SL1 Tangata Whenua Working Group), has been established for both the SL1 Listed Project, and the SL1 Houchens and SL1 Rogerson developments.

A Memorandum of Understanding for the SL1 Houchens development, called SL1 Stage 2 in the MOU is included as **Attachment 17**. Both Chinamans Hill Ltd and Ohaupo Land Limited Partnerships have entered into this MOU with the SL1 Tangata Whenua Working Group and will continue to work collaboratively with iwi as the referral application, and any subsequent substantive application is progressed.

Outside of the MOU and SL1 Tangata Whenua Working Group, wider discussions with iwi have occurred as the SL1 Growth Cell develops. This included a korero on the Waikato River surface water take for the SL1 Growth Cell, which included a wider update on the Fast Track Approvals Act applications in the SL1 Growth Cell, including SL1 Houchens, see **Attachment 17A**. The applicants have also progressed discussions with iwi, and this is reflected in a letter of support, **Attachment 17C**

The representation of the SL1 Tangata Whenua Working Group is reflective of ongoing korero on FTAA projects in the Waikato and input from Waipa District Council and Hamilton City Council. In this case, we have engaged with Ngaati Wairere, Ngaati Maahanga, Ngaati Koroki Kahukura, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Apakura and Waikato-Tainui.

In addition, we understand Waikato Tainui were also invited as part of a Future Proof consultation session outlined in Section 6 below.

In addition, written support has also been provided by Ngaati Hauaa, see **Attachment 17D**.

Through ongoing and meaningful engagement with Mana Whenua, it is considered that any potential adverse effects can be appropriately mitigated. Appropriate protocols (such as karakia, cultural monitors and cultural protocols), involvement in the design, and promotion of indigenous planting are examples of mitigation. There is a risk that archaeological sites may appear or be uncovered in the construction process, which can be managed through accidental discovery protocol. The project will incorporate cultural values in its design, using Mana Whenua expertise to integrate their values and cultural heritage (which is currently largely invisible). This is an opportunity to reflect the area's cultural history in the development, including through activities, facilities, forms, artwork, local flora, and materials significant to the reinstatement of their presence and aspirations.

5.9 Ecology

The Ecology Memorandum, **Attachment 8**, identifies positive and adverse effects on ecological values arising from the proposal as well as proposed mitigations. These include:

- The potential for watercourse, riparian and wetland restoration, removing exotic and pest plant species and in turn increasing the amount of native vegetation within the Site, and enhancing habitat for native fauna.
- The potential for higher quality water discharging from the site over the long term through the removal of stock and a change in land use leveraging stormwater management strategies.
- Removal of poor quality, predominantly exotic terrestrial vegetation and habitats and the effects of this loss on any terrestrial fauna (e.g., birds, lizards, bats) resident within the project area. This can be managed to avoid adverse effects on native fauna. A management plan approach is proposed to address any effects on birds, lizards and bats so that they are avoided or adequately mitigated. Management of fauna would be subject to the provisions of the WA, and the management of lizards specifically, would require a WAA from DOC as previously identified.
- Unavoidable loss of low-quality wetland habitat, if present (i.e., via groundwater draw down and/or earthworks). This effect will be addressed via avoidance where practicable, and where loss cannot be avoided, remedied or mitigated in accordance with the effects management hierarchy, biodiversity offsetting and/or aquatic compensation will be implemented. In addition to any specific offsetting or compensation, stormwater treatment wetlands constructed as part of the development would be designed to maximise their ecological value as habitat for native species.
- Unavoidable loss or modification (i.e., via groundwater draw down and/or earthworks) of some artificial drains which may provide habitat for black mudfish and other native fish such as eels.
- Potential adverse effects on short-term water quality and aquatic life due to sediment and/or contaminant discharges.
- Potential disturbance of fish migration and spawning during the works, depending on timing. These effects will be reduced by managing the timing of the works and use of well-designed temporary diversion channels as required to allow fish passage around any active works. Adverse effects on indigenous fish during instream works will be managed through the implementation of a fish management plan.
- The potential for the temporary restriction of fish passage. Culverts will be designed in accordance with best practice solutions to provide fish passage.
- The potential for introduction of weed and pest species. This can be managed via a weed management plan which includes biosecurity protocols (e.g., for earthworks machinery entering the site) and including weed and pest management as part of habitat restoration.

Relying on the Ecological Memorandum, it is anticipated that adverse ecological effects are manageable. A detailed ecological assessment and ecological management/offsetting plan will be included in the substantive application.

5.10 Highly Productive Land

As considered in Section 6.2 above, it is considered that there is a pathway, and the project can be consistent with the NPS-HPL.

5.11 Noise and vibration

An Acoustic Memorandum is included within the application package, **Attachment 14**. This assessment concludes that future industrial activities can be designed, located and managed to achieve compliance with the permitted activity noise standards when measured and assessed at all adjacent receivers. A number of options for management of noise are discussed in the report that will form part of detailed consideration for the substantive application.

The Acoustic Memorandum has considered management of noise compatibility within the site, road traffic noise effects and management of noise and vibration effects beyond the site (proposed industrial land use), *finding that future activities on the proposed industrial lots can be located, designed and managed to achieve compliance with the relevant noise limits prescribed by the Waipa District Plan at all assessment location beyond the site. The proposal can be designed to achieve compatibility with the level of acoustic amenity anticipated and provide for in the adjacent Large Lot Residential Zone and Rural Zone of the Waipa District.*

Compatibility between the industrial/commercial and noise sensitive land use activities within the Site can be achieved through a range of measures. We have outlined a range of recommendations that can be explored and refined as part of detailed technical assessments to support a substantive application.

The Memorandum includes a number of recommendations designed to manage potential noise and vibration effects including:

- That the substantive application includes a detailed construction noise and vibration assessment that determines compliance with the recommended numerical limits and assessment procedures set out in NZS 6803:1999 Acoustics – Construction Noise and German Standard DIN 4150-03:1999 Structural Vibration – Effects of vibration on structures. Assessment will detail how a CNVMP will be used to ensure construction effects are minimised to ensure compliance.
- Ongoing land use compatibility between industrial, commercial and rural residential lots. Controls are based on the same general.
- Measures to preclude noise sensitive activities from establishing within the industrial area, that any proposed noise sensitive activities be separated from the SL1 corridor by distances exceeding 200m.
- Further investigation of road traffic noise modelling associated with State Highway 3, taking into account the site specific features to determined whether the area of land should be subject to acoustic treatment controls enabling mitigation response to be specifically tailored to the relevant section of the road.
- Any substantive application provide greater clarity for future landowners by including specifications for any required mechanical ventilation and cooling system required in conjunction with necessary acoustic treatment.

Based on this advice it is considered that noise and vibration effects associated with construction and implementation of the proposal are acceptable and can be further refined as part of a substantive application.

5.12 Greenhouse gas emissions

The project will contribute to supporting climate change mitigation, including the reduction of greenhouse gas emissions, specifically through providing for urban form that supports low emission transport choices and mode shift, encouraging growth in areas that have or can support good travel choices and shorter average trip lengths. As detailed through the SL1 Concept Plan, the site is well located to provide for diverse multi modal transport choices due to its excellent accessibility and location. This includes, freight, bus, train, walking and cycling transport modes. The project site is:

- Within 4km of the CBD;
- Strategically located to provide good accessibility and connections with Southern Links;
- Within walking distance to existing bus stops which provides direct connections to wider Hamilton;
- Within 2km of Te Huia train station; and
- Within close proximity to access Hamilton airport.

The SL1 Houchens Development, and wider SL1, is highly accessible to the CBD, housing, jobs, commercial activities, community services, open space and the airport. Increased population will also improve the viability of more frequent public transport connections which could also benefit the neighbouring residential areas. Notably, the proposed residential development will support public transport use through its proximity to existing PT services in Dinsdale and Melville via a short walk, scooter or cycling trip. The project includes the provision of new footpaths, legible connections to the CBD, schools, existing open space and parks, connections into existing public transport networks, dedicated walking and cycling facilities.

Overall, it is considered that the project will balance the potential adverse effect of greenhouse gas emissions by providing for a walkable, densified future residential and industrial development that discourages private vehicle movements and appropriately mitigates adverse effects on the environment (where possible).

5.13 Soils

As detailed in the LUC Classification Assessment, **Attachment 10**, and outlined above, the site is underlain by class 2, 3, and 4 soils, as shown in **Figure 5** below. The class 3 soils are limited to classes 3e3 and 3w1.

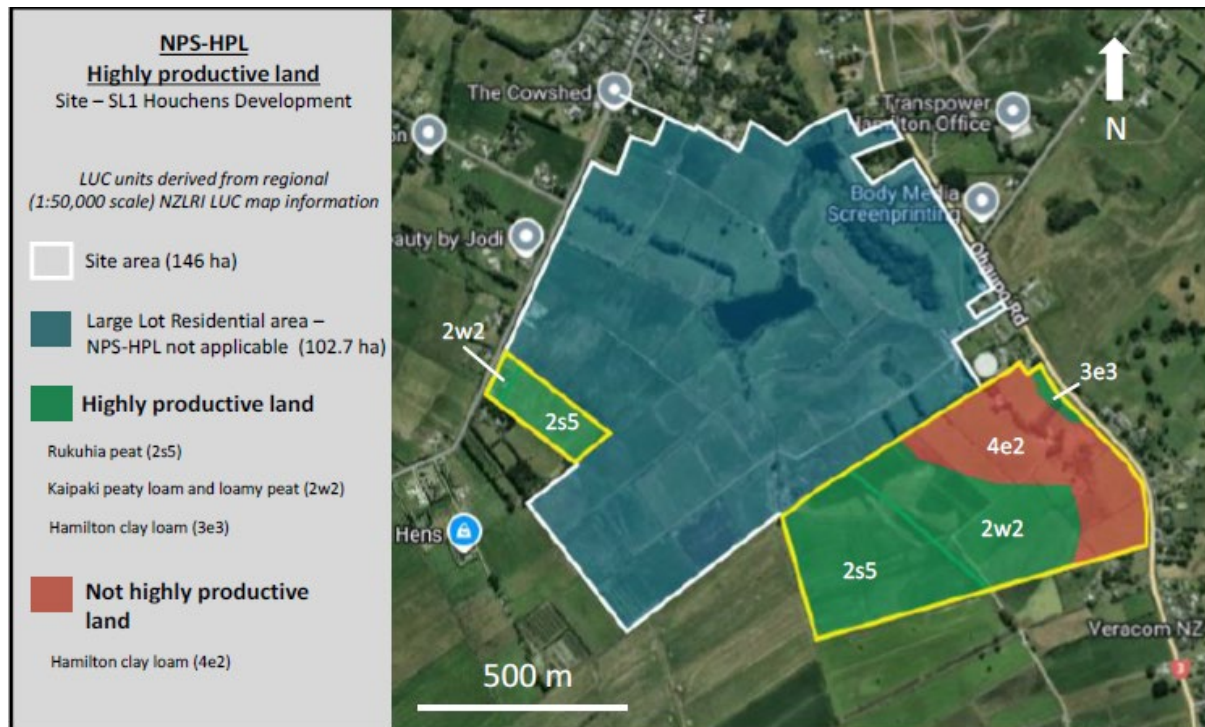


Figure 12: The distribution of NPS-HPL highly productive land for the Site, based on the NZLRI (1:50,000 scale)

Based on NZLRI LUC map information, and the Waipa District Plan zoning, 29.3 ha (20.1%) of the Site area is classified as highly productive land when applying NPS-HPL clause 3.5(7). Based on NZLRI LUC map information, and the Waipa District Plan definition for high class soil, the Site does not have any land with high class soils. Regional scale (1:50,000 scale) NZLRI and NZFSL map information showed that land with Organic soils (peat soils) occupy 72% of the Site area. Moderately well drained Granular soils on rolling slopes (LUC 3e3) and strongly rolling slopes (LUC 4e2) respectively occupy <1% and 27% of the Site.

On-site assessment would be required to confirm these soils and their LUC classification which will form part of a substantive assessment.

The class 2 and 3 soils within the site meet the definition of highly productive land under the NPS-HPL, however there are classes, namely 2w3, 3e3, and 3w1, which do not meet the definition of ‘high class soil’ under the WDP-OP and only partially meet the definition of ‘high quality soil’ under the WODP.

Acknowledging the above, and the benefit of further detailed assessment as part of a substantive application, it is anticipated that the potential adverse effects of urban development and any potential loss of highly productive and high class/high quality soil are outweighed by the benefit of providing needed housing supply and variety within the strategic SL1 Houchens location.

5.14 Positive Effects

The SL1 Houchens Development will deliver a number of positive effects, including but not limited to:

- Increasing housing supply and diversity for the region;
- Increasing industrial land supply, responding to an identified shortfall for the region;
- Creation of employment opportunities;

- Enhancement of the natural environment through the design which seeks to weave open space throughout the development area; and
- Generation of a wide range of economic benefits, such as providing a direct boost in housing supply to meet growing demand, meeting the needs of an evolving population, provision of employment (construction and operational) and contributing to the wider support and investment in regionally significant infrastructure (like the Southern Links Road of National Significance).

5.15 Mitigation

This memorandum, and the supporting memorandums from the technical experts, identify a range of measures to address potential adverse effects and ensure that those adverse effects are avoided, remedied, or mitigated. This includes the application of standard and well-established mitigation measures and more bespoke approaches to manage the particular effects of this proposal. These can be addressed through design, conditions of consent, and monitoring through a substantive application.

6.0 Engagement and Consultation

The applicant has undertaken engagement and consultation with key stakeholders and iwi and hapū, as set out in the Consultation Summary included as **Attachment 16**. A copy of the consultation pack that was presented and shared is also included at **Attachment 16** and copies of the meeting minutes and feedback received from stakeholders are included at **Attachments 17-22**.

Key outcomes and discussions are also set out below.

- **Iwi and hapū:** Ongoing engagement and consultation has been undertaken with Ngaati Wairere, Ngaati Maahanga, Ngaati Koroki Kahukura, Ngaati Tamainupoo, Ngaati Hauaa, Ngaati Apakura and Waikato-Tainui. A series of hui have been held to discuss the wider SL1 Growth Cell, SL1 Water Take and wider projects, and this project and the referral application. Following these discussions, letters of support for the referral application has been received, and a MOU has been signed between the applicants and the hapū to formalise the preparation of a CVA. Refer to **Attachment 16** and **Attachment 17** for supporting documentation.
- **Future Proof Committee** – On 4th December 2025, a meeting was held online with the Future Proof Partners (including Hamilton City Council, Waikato District Council, Waikato Regional Council and NZTA) to discuss the SL1 Houchens consultation pack and masterplan. Key discussion points included:
 - Land use and urban design of masterplan
 - Transport connectivity and wider SL1 growth cell
 - Servicing strategy for water, wastewater and stormwater;
 - Application documents being supplied to Future Proof once it is lodged.

Refer to **Attachment 17** for pre-lodgement consultation undertaken with the Future Proof Partners.

- **Hamilton City Council** – Ongoing workshops with HCC and wider stakeholders as part of the Listed SL1 Projects substantive application preparation has occurred, which has involved consideration of the SL1 Houchens development.

- **Department of Conservation (DoC)** – Pre-lodgement consultation initiated via formal application to DoC email at Fasttrackapplicationenquires@doc.govt.nz. Subsequently, we have provided DoC with a copy of the consultation pack and supporting specialist ecological report. We are engaging with DoC on the Wildlife Act Authority as part of this consultation and will continue to meet further with the DoC project lead as we move towards a substantive application. Evidence of pre-lodgement consultation is outlined in **Attachment 19**.
- **Heritage New Zealand Pouhere Taonga (HNZPT)** – Pre-lodgement consultation initiated via formal email. Based on the advice and request of HNZPT, an archaeology assessment for the site was prepared by RedOx, and is included as **Attachment 11**. The results from the desktop research identified a potential for unrecorded archaeology within the site. A site visit was conducted to identify whether this unrecorded site was archaeological. As a result, the ‘old ditch’ shown in the images was recorded in the NZAA database. With this recorded archaeology within the site it is recommended that an Authority from HNZPT be applied for prior to any works. HNZPT has confirmed their support for the recommendations contained in the RedOx Archaeology Assessment, and their confirmation is included in **Attachment 20**.
- **Ministry for the Environment (MfE)** – Pre-lodgement consultation initiated via formal email to MfE at AdminAgencyFTAA@mfe.govt.nz. The email provided an overarching description of the proposal and a copy of the masterplan. MfE replied via email confirming the consultation request with a Section 11 letter attached outlining the national direction under the RMA that requires consideration and the relevant matters have been considered and assess above in Section 4. Evidence of pre-lodgement consultation is outlined in **Attachment 21**.
- **Ministry of Education (MoE)** – Pre-lodgement consultation initiated via formal email. Subsequently, we had a meeting with key MoE representatives to present the consultation pack and discuss any feedback or concerns specifically from a schooling perspective as well as the broader proposal. Following the meeting, the consultation pack and meeting minutes were circulated to MoE. Subsequently, B&A received email confirmation to confirm that MoE were supportive of the proposal and had no further feedback. Evidence of the pre-lodgement consultation is outlined in **Attachment 22**.

7.0 Section 22 Fast-Track Approvals Act (2024)

The following section is intended to guide the overall consideration of the SL1 Houchens Development Referral application under Section 22, where relevant. **Table 2**.

Table 3 Section 22 – Fast-track Approvals Act 2024 Criteria

Section 22 – Fast-track Approvals Act 2024 Criteria	Criterion	Signpost
(1)(a)	<i>the project is an infrastructure or development project that would have significant regional or national benefits; and</i>	<i>Section 1.7 of this Planning Memorandum and Attachment 4 Economic Memorandum</i>
(1)(b)	<i>referring the project to the fast-track approvals process—would facilitate the project, including by enabling it to be processed in a more timely and</i>	<i>Section 1.8 of the Planning Memorandum.</i>

	<i>cost-effective way than under normal processes; and is unlikely to materially affect the efficient operation of the fast-track approvals process.</i>	
(2)(a)(ii)	<i>will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure:</i>	<i>See Section 1.7 above, and Economic Memorandum Section 7 (Attachment 4).</i>
(2)(a)(iii)	<i>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):</i>	<i>See Section 1.7 above, and Economic Memorandum Section 6 & 7 (Attachment 4).</i>
(2)(a)(iv)	<i>will deliver significant economic benefits:</i>	<i>See Section 1.7 above, and Economic Memorandum Sections 4, 5, 6, 7 (Attachment 4).</i>
(2)(a)(x)	<i>is consistent with local or regional planning documents, including spatial strategies:</i>	<i>See Section 1.7 above, and Economic Memorandum Section 7 (Attachment 4)</i>

8.0 Conclusion

Having undertaken a high-level planning assessment, it is considered that there are no planning related reasons why SL1 Houchens could not proceed under the Fast-Track Approvals Act 2024. Through strong design and technical input, SL1 Houchens can achieve an urban environment that positively impact future residents and the wider Waikato and Hamilton City community, without having adverse environmental effects.

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