1 October 2026

Environmental Protection Authority
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NEW ZEALAND

WAIKATO GREENFIELD RACING HUB FAST-TRACK SUBSTANTIVE APPLICATION

Introduction

1. This letter is provided on behalf of Waikato Thoroughbred Racing Incorporated ("**WTR**") in support of its substantive fast-track application to develop the Waikato Greenfield Racing Hub and residential development across approximately 164 hectares in the Waikato district ("**Project**"). It outlines the integrated nature of the Project and the relationship between its four precincts, which have been planned and developed as components of a single development.

Project

2. The Project consolidates four existing racing facilities, Te Rapa, Waipā, Cambridge Thoroughbred and the Cambridge Harness Raceway, into a single racing facility. The Project is strategically located between Hamilton and Cambridge, with direct access to the Waikato Expressway.

3. The Project comprises four distinct but complementary and intrinsically interlinked precincts, namely the Racing Precinct, Bloodstock Precinct, Senior Living Precinct, and Commercial and Residential Lifestyle Precinct. Together, they form a single integrated development, with each precinct supporting the Project's operation, viability and delivery:

   (a) The Racing Precinct provides the core thoroughbred and harness racing and training infrastructure;

   (b) The Bloodstock Precinct supports the nationally significant breeding and sales industry;

   (c) The Senior Living Precinct delivers retirement accommodation, aged care, and a community centre; and

   (d) The Commercial and Residential Lifestyle Precinct provides equine support services, commercial facilities, and rural residential living.

4. The four precincts are connected through shared infrastructure, including internal roading, wastewater treatment, stormwater management and water supply

systems, and are unified by an integrated master-planned layout, landscape framework and access network. Together, they form a single development, with each precinct contributing to the operational efficiencies, economic sustainability and critical mass that underpins the Project's delivery and long-term success.

5. All precincts together are fundamentally important to the viability and integrity of the Project.

Financial Viability

6. The Project's financial viability depends on the integrated development of all four precincts. To support the racing related components of the Project and enhance the site's long-term vibrancy, the Project includes a Senior Living Precinct and a Commercial and Residential Lifestyle Precinct, together with other activities that generate the revenue and investment needed to deliver the racing infrastructure and enable the Project to proceed as a whole. These activities are integral to the Project.

7. This interdependence is reflected in the Project staging plan. The Senior Living Precinct is to be delivered through a partnership with a retirement village operator, with that investment contributing directly to the delivery of the racing hub. The Commercial and Residential Lifestyle Precinct further supports the Project's viability by broadening its income base through equine support services, small-scale commercial activities and rural residential development. Without the revenue and investment generated by these precincts, the core racing facilities cannot be delivered.

8. The Senior Living Precinct benefits from convenient access to health, retail and community services, as well as active transport connections via the Te Awa Cycleway, making this location well suited to retirement accommodation. The residential lifestyle lots broaden housing choice by providing product aligned with demonstrated market preferences, while the commercial precinct contributes additional business development capacity. Both precincts are planned alongside the Project's other land uses, infrastructure, access and amenity outcomes.

9. There are significant economic benefits arising from the Project including approximately $457 million in direct expenditure, a gross regional GDP contribution of $147.1 million (8% net present value), and 1,306 full-time equivalent jobs over the development period. These benefits are generated by the Project as a whole. The Project's four precincts provide the commercial foundation necessary to deliver a consolidated Waikato racing hub.

Stakeholder support

10. WTR has worked hard to engage with stakeholders on the Project and we're pleased to receive broad support from local and regional stakeholders, including local councils, mana whenua, Hamilton City Council and Waipā District Council. Ngāti Hauā and Ngāti Korokī Kahukura have provided supportive cultural assessments, and a Memorandum of Understanding has been prepared to establish a framework for engagement, collaboration and shared long-term

outcomes. Waikato-Tainui has indicated its support for the positions of Ngāti Hauā and Ngāti Korokī Kahukura.

11. Hamilton City Council recognises the Project's regional benefits, including supporting the Waikato racing industry and enabling the redevelopment of existing urban racecourse land, and has expressed support for the Project's regional significance and the outcomes it will deliver for the Waikato region.

Conclusion

12. The four precincts are fundamental components of a single Project. Together, they provide the funding, functionality and long-term resilience necessary to deliver and sustain the Project. The viability of the Project depends on the integrated development of all four precincts, each of which performs a distinct but interdependent role within the overall Project.

Kind regards



Bruce Harvey

WTR Chair