Hon Tama Potaka

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

CORTP-5122

Hon. Chris Bishop
Minister for Infrastructure
c.bishop@ministers.govt.nz
Parliament Buildings
Private Bag 18041
WELLINGTON 6160

Tēnā koe Hon. Bishop

Thank you for your invitation to comment on the fast-track consent application for the Harlow Lifestyle Village project. This project is a senior living community (restricted to persons over 55) comprising approximately 407 dwellings, including single-storey houses, duplexes, apartments and a 100-bed care facility, as well as communal facilities, and a neighbourhood centre.

Recent analysis, prepared by Future Proof, concludes that there is surplus provision for retirement living in the area into the 2040's (both existing and under construction). However, this project would increase the supply of homes, and provide additional capacity to relieve demand for this housing typology elsewhere in New Zealand.

This development would be a departure from local development strategies (Waipā District Growth Strategy (Waipā 2050) and Future Proof – Future Development Strategy). The project site is currently zoned rural in the Waipā District Plan and is subject to a private plan change request by the applicant.

Officials inform me that Waipā District Council is likely to oppose this project in its submission, on the basis that the council sees no local need for this type of housing development, amongst other concerns, such as costs to ratepayers from infrastructure development.

I have not been made aware of any natural hazard risks present on the intended development site.

I have no objection, from the perspective of the Housing Portfolio, about this project being referred to the next stage. Thank you again for the opportunity to comment.

Mauriora

Hon Tama Potaka
Associate Minister of Housing

Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment

22 AUG 2025

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Four Fast-track Approvals Act referral applications – Received 25-31 July and 6 August

Dear Chris

Thank you for the opportunity to comment on four applications for referral under the Fast-track Approvals Act (the Act):

- Out of Scope
- Out of Scope
- Harlow Lifestyle Village, FTAA-2507-1084
- Out of Scope

I am providing comments in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to have significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided. I defer to you and other relevant Ministers to assess the remaining criteria.

Out of Scope

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand | +64 4 817 6801 | n.willis@ministers.govt.nz

Out of Scope

Harlow Lifestyle Village, FTAA-2507-1084

This proposal is to build a retirement village in Te Awamutu in the Waipā district, in Waikato. It will include 407 housing units from apartments to single-storey and duplex units, and a 100-bed care facility. It will also include a neighbourhood centre and communal facilities.

Economic assessments provided by the applicant showed short- to medium- term impacts in the Waikato region during the proposed four-year development and construction period. These include estimated value-add to regional GDP, and additional employment and wages generated. Once operational, the care facility is seen to provide ongoing benefits in these same economic components.

This proposed construction of a dedicated retirement village with an aged-care facility will address issues on housing supply pressures for a growing and ageing population. A detailed demand analysis for retirement housing options in the Waikato region showed that this proposal would address critical housing supply issues likely faced by the region in the future. This project will provide the infrastructure needed for continued economic growth.

Given that the primary outcome of the proposal would be a significant boost to housing supply, this application may be best assessed under section 22(2)(a)(iii) of the Act, specifically, for its potential to increase housing supply, address housing needs or contribute to a well-functioning urban environment.

Out of Scope

Sincerely

Hon Nicola Willis
Minister for Economic Growth

From:	Infrastructure Portfolio
To:	FTAreferrals
Subject:	FW: FTAA-2507-1084 Invitation to comment on Fast-track referral application for the Harlow Lifestyle Village project under the Fast-track Approvals Act 2024
Date:	Thursday, 14 August 2025 1:58:31 pm
Attachments:	image002.png

Please see response below.

From: Environment Portfolio <Environment.Portfolio@parliament.govt.nz>
Sent: Thursday, 14 August 2025 1:38 PM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: RE: FTAA-2507-1084 Invitation to comment on Fast-track referral application for the Harlow Lifestyle Village project under the Fast-track Approvals Act 2024

Good day,
Thank you for the below invitation to comment.
Please be advised that Minister Simmonds has reviewed this application and does not wish to provide comment.

Kind regards,

Office of Hon Penny Simmonds
Environment Portfolio
Minister for the Environment | Minister for Vocational Education
Associate Minister for Social Development | MP for Invercargill

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

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From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Thursday, 31 July 2025 8:00 am
To: Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Casey Costello (MIN) <C.Costello@ministers.govt.nz>; Shane Jones (MIN) <S.Jones@ministers.govt.nz>; Nicola Willis (MIN) <N.Willis@ministers.govt.nz>
Cc: FTAreferrals <ftareferrals@mfe.govt.nz>
Subject: Invitation to comment on Fast-track referral application for the Harlow Lifestyle Village project under the Fast-track Approvals Act 2024 – FTAA-2507-1084

To:
Minister for Economic Growth
Minister for Regional Development
Minister for the Environment
Minister for Seniors
Associate Minister of Housing

Dear Ministers,

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

The Minister has received an application from Te Awamutu Developments Limited for referral of the Harlow Lifestyle Village project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2507-1084).

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

Invitation to comment on referral application

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

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

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

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

Process

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

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

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

Important Information

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

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

Project summary

Project name	Harlow Lifestyle Village
Applicant	Te Awamutu Developments Limited
Location	Te Awamutu, Waikato
Project description	The project is to develop a senior living community (restricted to persons over 55) at 2025 Ohaupo Road, Te Awamutu, Waikato. The project will include: a. 407 dwellings including single-storey houses, duplexes, apartments and a 100-bed care facility b. Communal facilities c. A neighbourhood centre.

Yours sincerely

Hon Chris Bishop
Minister for Infrastructure

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

Office: 04 817 6802 | EW 6.3
Email: c.bishop@ministers.govt.nz   Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

From: s 9(2)(a)
To: FTAreferrals
Subject: FW: FTAA - early consideration of conflict matters - FTAA-2507-1084
Date: Tuesday, 29 July 2025 9:37:15 am
Attachments: image001.png

Please note there will be no comment from the Minister for Regional Development

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From: Leah MacDonell s 9(2)(a)
Sent: Monday, 28 July 2025 6:06 PM
To: Rob Schick s 9(2)(a)
Subject: RE: FTAA - early consideration of conflict matters - FTAA-2507-1084

Thanks Minister won't be commenting on this one.

Leah

From: Rob Schick s 9(2)(a)
Sent: Monday, 28 July 2025 11:03 AM
To: John Creech s 9(2)(a) ; Paula Oliver s 9(2)(a) ; Nicola Tynan s 9(2)(a) ; Sukie Paras s 9(2)(a) Alex Dykes s 9(2)(a) Leah MacDonell s 9(2)(a) ; John Doorbar s 9(2)(a) >; Corin Higgs s 9(2)(a) Oliver Taylor s 9(2)(a) Rose Austen s 9(2)(a) Peta Ranieri <s 9(2)(a) Travis Ancelet s 9(2)(a)
Cc: Joshua Smith s 9(2)(a)
Subject: FTAA - early consideration of conflict matters - FTAA-2507-1084

Hi,

We have received a Fast-track Approvals Act (FTAA) application for processing for referral.

As part of that process, the following Ministerial portfolios have been identified as being invited to comment:

- Minister for Economic Growth
- Minister for Regional Development
- Minister for the Environment
- Associate Minister of Housing
- Minister for Seniors

Before I send through a formal invitation letter from the Minister for Infrastructure could you please confirm that you have given consideration to any potential conflict matters and that I am able to provide the application to your offices to seek ministerial comment. It would be great if you were able to do that by **midday, 30 July 2025**, as we are working to statutory time limits under the FTAA.

The high-level detail of the application is as follows:

Ref No	Summary	Identified portfolios
FTAA-2507-1084	*Project name*: Harlow Lifestyle Village *Applicant*: Te Awamutu Developments Limited *Approximate Location*: Te Awamutu *Project description*: The development and construction of a senior living community including a variety of housing dwellings, care facilities, communal facilities, and a neighbourhood centre.	Regional Development Economic Growth Environment Housing Seniors

Please note that information about the applications received is not publicly available and is provided in confidence.

Please let either Josh Smith or I know if you have any questions, or you may wish to speak with the Cabinet Office for advice on whether a conflict exists and/or requires a transfer of the Minister's responsibility.

Thanks,
Rob

Rob Schick (he/him)
Private Secretary – Infrastructure (Fast-track) | Office of Hon Chris Bishop
Minister for Housing | Infrastructure | RMA Reform | Transport
Associate Minister for Finance | Sports & Recreation | Leader of the House | MP for Hutt South

Mobile s 9(2)(a) Email: s 9(2)(a) Website: www.beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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

Project name	Harlow Lifestyle Village

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

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

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

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

Minister's signoff

Hon Casey Costello

Minister for Seniors

Date 27/8/25

Hon Casey Costello

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

Hon Chris Bishop

Minister for Infrastructure

Parliament Buildings

Wellington

Fast-track Approvals Act referral application: Harlow Lifestyle Village, FTAA-2507-1084

Dear Chris

Thank you for the opportunity to comment as Minister for Seniors on this application for referral under the Fast-track Approvals Act 2024 (the Act). I have considered whether this application is likely to 'increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020)', under s22(2)(a)(iii) of the Act, based on the information provided in the application. I will leave it to you and other relevant Ministers to assess the other criteria.

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

- The construction of a lifestyle village comprising 203 villas, 124 duplex units, 80 apartment units, and a 100-bed care facility.

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

Sincerely,

Hon Casey Costello

Minister for Seniors

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand | +64 4 817 6827 | c.costello@ministers.govt.nz

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

Please upload comments directly via the portal by completing this template.

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

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

Please do not use copyright material without the permission of the copyright holder.

All information held by MfE is subject to the Official Information Act 1982.

More information on the fast-track approvals process and providing comments can be found at Process overview | Fast-track website

Waipā District Council comments on a project under the Fast Track Approvals Act 2024

Project name	Harlow Lifestyle Village (Te Awamutu Developments Ltd) FTAA-25-07-1804

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

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

1. Contact Details

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

Organisation name (if relevant)	Waipā District Council		
***First name**	Quentin		
***Last name**	Budd		
Postal address			
***Contact phone number**	s 9(2)(a)	**Alternative**	s 9(2)(a)
***Email**	s 9(2)(a)		

2. Please provide your comments on this application

Correspondence received on 31 July 2025 requesting feedback and inviting comments on the above-mentioned Fast-track referral application refers. Waipā District Council appreciates the opportunity to provide the following comments to you on this application. The comments are set out under the following headings:

- Site Circumstances
- Fast-Track Approvals Act
- Applicant Consultation
- Site Circumstances
- Waipā District Growth Planning
- Significant Regional and National Benefit
- Substantive Issues

Waipā District Council (WDC) does not support referral of the Harlow Lifestyle Village to the fast-track process for the following reasons:

1. There will be no significant national or regional benefits arising from the Harlow Lifestyle Village that could not otherwise arise from other similar developments establishing within live-zoned or deferred residential land forming the planned and anticipated settlement pattern of Te Awamutu.

2. The retirement living market analysis completed by Waikato Regional Council and Future Proof Partnership has concluded that in the Future Proof Area Waipā currently has the largest surplus of retirement living supply where current (and in progress) supply is projected to be sufficient to meet demand until around 2040. On this basis there is no need to fast-track a development that is not currently needed.

3. No compelling reason to depart from the settlement pattern that has been planned for Te Awamutu through Waipā 2050 and Future Proof has been presented.

4. The development as proposed is inconsistent with the growth policies and settlement pattern for Te Awamutu promoted by the Waipā District Plan, Waipā 2050 Growth Strategy, Future Proof and the Waikato Regional Policy Statement.

5. The development as proposed, fails to satisfy the criteria for unanticipated development set by both Future Proof and the Waikato Regional Policy Statement.

6. There is sufficient land availability and capacity within the live-zoned and deferred Te Awamutu growth cells to accommodate a development of the size being promoted by the applicant. Given this and that there is surplus capacity to meet urban dwelling demand there does not appear to be any justification for enabling residential development of rural land in this location.

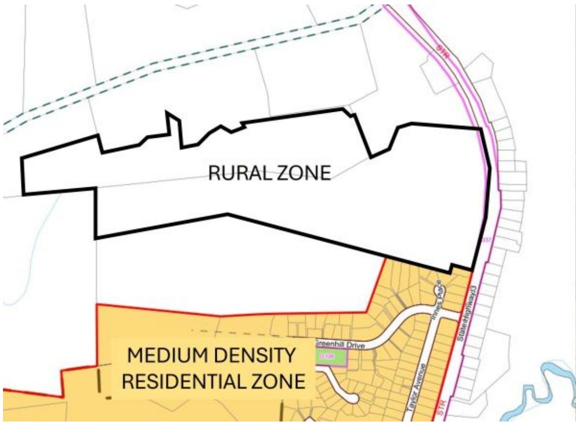
7. The lack of information and design detail on proposed links to State Highway 3 and outcomes of consultation with New Zealand Transport Agency is concerning. Provision for the continued safe and efficient operation of the roading network has not been adequately addressed.

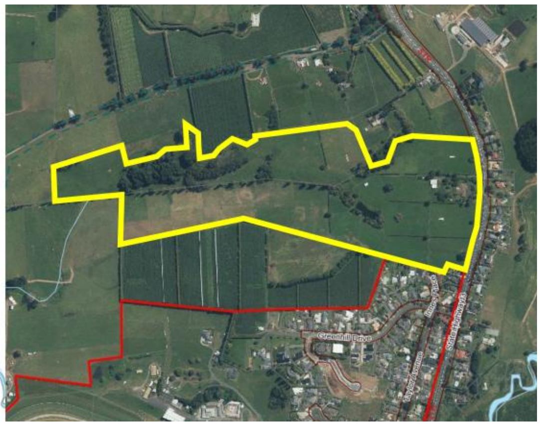
8. The site is located on the northern periphery of Te Awamutu and is not integrated with or connected to neighbouring residential areas. There are no existing facilities that provide for walking or cycling needs beyond the subject site.

9. Post development the site will largely remain surrounded by productive rural land which could be adversely impacted by reverse sensitivity complaint. This in turn could lead to pressure for further conversion of rural land (particularly land to the immediate south) for urban purposes on the basis that legitimate rural use is constrained by urban development.

10. The application material lacks clarity regarding expectations for final ownership and responsibility for infrastructure internal and external to the development site. Waipā District Council expects that all civil infrastructure assets (roads, pipes, pumps, devices, open spaces) necessary to serve the development, along with any associated regional discharge consents will remain under private ownership and control in perpetuity. Without acknowledgement of this WDC is opposed to the imposition of any financial commitments on ratepayers that may arise from any contrary arrangements.

Site Circumstances





The subject land is located within the Rural Zone. Besides a 155m long interface with medium density residential zoned land, the land is surrounded by farmland which is developed and used for productive pastoral farming and horticultural purposes.

There are no reticulated infrastructure services (water, stormwater, wastewater) to the land. There are no current projects in the Waipā District Long Term plan that would facilitate the extension of services to the subject site.

The land has frontage to and obtains vehicle access from State Highway 3 which is a limited access road in this location

The land is currently the subject of a private plan change request (PC29) that was lodged with Waipā District Council on 18 January 2023. The request has been accepted for processing. Notification of the plan change will occur if instructions to do so are received from the applicant.

Fast-Track Approvals Act

The correspondence received advised that Waipā District Council **must** provide comments on:

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

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

<u>Competing Applications.</u>

Section 47 (EPA makes recommendation on whether there are competing applications or existing resource consents for same activity) of the Fast-track Approvals Act relates to resource consents referred to in section 30(3)(a), which in turn relate to resource consents that apply to section

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

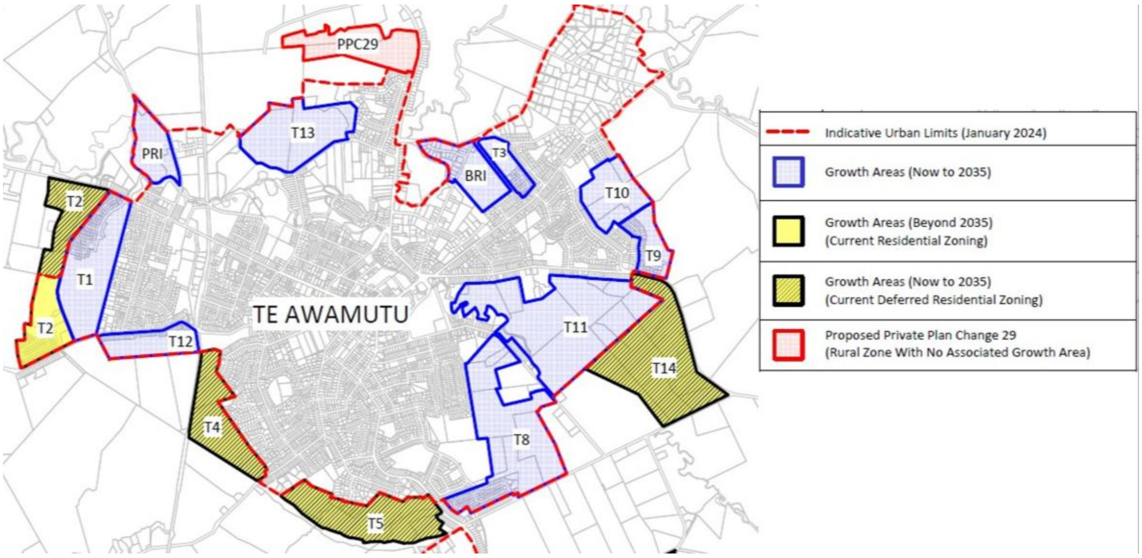
Applicant Consultation
We have reviewed the application documents submitted with the referral application. Page 23 of the planning report provides a synopsis of the most recent formal discussions between the applicant and Waipā District Council regarding the applicant's development aspirations for this site and the associated private plan change application (PC29). We attach a copy of the full email sent to the applicant on 14 February 2025. The points of difference between this and the consultation record provided in the referral application are:
 	
• *The applicant made it clear at the meeting that:*
  - *It is their intention that the land will solely accommodate senior living / retirement housing; and*
  - *They would be responsible for all associated development and construction works; and*
  - *There would be no subdivision where vacant land was on-sold to the market for development outside of the senior living / retirement complex.*
 	
• *PC29 as lodged does not contain any provisions that would guarantee the density or land use outcomes that have been promoted by the applicant, will actually be achieved.*
 	
• *The target age bracket for the retirement development is 55 years old and up. This is a broader market for senior / retirement living than what is anticipated by the Waipā district plan for retirement villages. The definition of retirement village provided by the Waipā district plan is specific to people in their retirement. If it is the intention that the resultant development will not meet what a retirement village is defined as (or notably what the definition says it is not), then any discrepancies would need to be addressed and accounted for by the plan change application. At present it is noted that retirement villages are Restricted Discretionary Activities in the Medium Density Residential Zone.*
 	
• *Subject to satisfaction of the key concerns both Future Proof and the Waikato Regional Policy Statement provide a pathway for consideration of otherwise unanticipated urban rezoning proposals. Accounting for these documents along with the NPS – HPL will be the key determinant of whether the rezoning promoted by PC29 represents an appropriate outcome.*

Waipā District Growth Planning Te Awamutu is a small rural service town that just over 14,000 people call home. Waipā district is identified by the Resource Management Act 1991 and the National Policy Statement - Urban Development as a tier 1 local authority forming part of the tier 1 urban environment of Hamilton. WDC has been proactive in planning for the future growth of Te Awamutu since 2009. This is

evidenced through the Waipā district growth strategy (Waipā 2050) and the Future Proof – Future Development Strategy (Future Proof). These documents informed the development of the Te Awamutu town centre plan (2010) and the current operative district plan.

In combination, these documents inform and implement the community's vision for the sustainable future growth of Te Awamutu and the protection of the town's existing environment for future residents. A review of Waipā 2050 is programmed to commence later this year which will be used to inform spatial planning under the new Planning Act.

The map below identifies the growth cells in Te Awamutu developed through Waipā 2050 which currently form part of the Waipā District Plan. The location of the subject land relative to these growth cells is shaded red and notated PPC29.



The blue growth cells are live-zoned medium density residential zone land. All of the identified cells are in varying states of development and have development capacity available within them. In addition, there are four remaining growth cells (T2, T4, T5 and T14) that have not yet been activated (i.e. deferred residential zones) that are available for future residential development.

Deferred growth cells are activated through changes to the district plan. There is currently one live private plan change request that has been lodged for activation of T4 growth cell to medium density residential zone.

The 2023 Housing Development Capacity Assessment prepared for the Future Proof Partners under the requirements of the NPS-UD identifies that for Te Awamutu there is projected surplus in capacity to meet urban dwelling demand in the medium and long terms through to 2052.

There is sufficient land availability within the live-zoned and deferred growth cells to accommodate a development of the size being promoted by the applicant. On this basis and considering that there is surplus capacity there does not appear to be any justification for enabling residential development of productive rural land. No compelling reason to depart from the settlement pattern that has been planned for Te Awamutu through Waipā 2050 and Future Proof has been presented.

The retirement living market analysis completed by Waikato Regional Council and Future Proof Partnership (refer attachment 2) has concluded that in the Future Proof area, Waipā currently has the largest surplus of retirement living supply where current (and in progress) supply is projected to be sufficient to meet demand until around 2040. On this basis there is no need to fast-track a development that is not currently needed. Identification of land for future urban development and use should occur through appropriate spatial planning and not through ad-hoc development.
Significant Regional or National Benefit The purpose of the FAA is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. With respect to the matters that the Minister, under section 22(2) of the FAA, may consider to determine significant regional or national benefits WDC notes that the project: • Is not an identified priority project in any central or local government strategy; • Will not deliver new regionally or nationally significant infrastructure; • Is not needed to enhance capacity to address housing demand needs (including retirement living) in Te Awamutu; • Will not contribute to a well-functioning urban environment within Te Awamutu; • Will not generate significant economic benefits over and above that which would result from similar development occurring in live-zoned or deferred growth cells; • Will not support primary industries, development of natural resources, or climate change mitigation / adaptation; • Will not address any significant environmental issues; • Is inconsistent with the settlement pattern for Te Awamutu promoted by the Waipā District Plan, the Waipā 2050 Growth Strategy, Future Proof and the Waikato Regional Policy Statement WDC staff do not consider that there would be any significant regional or national benefits arising from the Harlow Lifestyle Village on the subject site that would not otherwise arise from other similar development establishing within live-zoned or deferred residential zoned land forming the planned and anticipated settlement pattern of Te Awamutu.
Substantive Issues The referral application proposes a staged development comprising 407 dwellings and a 100-bed care facility, which will require significant infrastructure upgrades to Waipa District Councils (WDCs) existing waters networks. The following comments highlight key considerations regarding the financial responsibilities for these upgrades, infrastructure ownership, and other potential impacts that are discipline specific that will require consideration and resolution if consent is granted. While it is recognised that these matters may be more relevant to a substantive application, it is important to WDC that they are raised at the earliest possible stage to inform the decision-making process. These matters relate to: • Infrastructure Ownership; • Development Contributions; • Stormwater; • Water Supply;

- Wastewater; and
- Transportation;

Infrastructure Ownership
The information provided by the applicant lacks clarity regarding the final ownership and responsibility for assets internal and external to the development site.

WDC expects that **ALL** civil infrastructure assets (roads, water pipes, wastewater pipes and pumps, stormwater pipes and devices, and open space areas) within the development extents will remain under private ownership in alignment with the retirement village act that would require the operator to charge its residents for the upkeep and maintenance of such facilities.

WDC will not accept public ownership or maintenance / upgrade responsibilities in respect of these assets

While some connection infrastructure within public road corridors beyond the development site could be vested to WDC, the wastewater rising main would need to be private to its connection point to council's gravity network. This is due to the maintenance and repair responsibilities associated with this linking to private pumpstations, needing to be with the operator in case of shut down and repair.

Further to the wastewater rising mains within existing public road corridors, legal mechanisms such as licenses to occupy, private easements, or a combination thereof may be required in order for the application to be successful in its long-term operation of wastewater services.

The request for freehold sections conflicts with private infrastructure and will require further confirmation of the easements and management entities.

Development Contributions
The site is currently within the "Rural" funding area of the Waipā District Council Development Contributions Policy. Upon connection to urban infrastructure, the "Te Awamutu" funding area will apply.

The current HEU (Household Equivalent Unit) is $15,569 (including GST). A special assessment, using the Te Awamutu rate per HEU, will be undertaken due to the retirement nature of the developments care and community facilities.

Stormwater
The development proposes on-site retention and treatment of stormwater runoff from increased impervious areas, prior to discharge into the wider water course from the Mangapiko Sub-catchment.

To mitigate some impacts the proposed works will have to detail some design methodology on water treatment swales and the inclusion of Rain gardens in lot designs, as this will reduce the overall reliance on the main retention ponds.

An appropriate discharge consent from the Regional Council will be required for managing that stormwater discharge, potentially imposing responsibilities on individual lot owners, which may be in conflict with the retirement village operational requirements.

Council expects awareness of any ongoing requirements potentially impacting future activities. Given the private nature of the downstream stormwater systems, WDC will not accept any enforcement or auditing responsibilities related to the regional discharge consent that will be necessary for the development.

Water Supply

Connection to the Council's potable water supply south of the development is proposed. Modelling has identified network upgrades necessary to service the development's water demand. These upgrades *must* form conditions of any approval granted and are subject to agreement with the Council's Water Services team.

The two Upgrade options from the WSP water modelling assessment are:

- Option 1: Close the two Non-Return Valves (NRVs) on Taylors Avenue, creating an isolated pressure zone within the wider reticulation. This would be an anomaly within the Water supply network, where previously WDC has avoided isolated pressure areas.

- Option 2: Replacing the current Greenhill booster pump with a new pump that caters for the additional demands created by the proposed Ōhaupō Road development, the fire-fighting supply flow required, and improves LoS to the wider Greenhill boosted zone area.
  - Pump 1 will be continuously operating to provide daily demands.
  - Pump 2 will be a "standby" pump to supply flows in an emergency event.

A Development Agreement (DA) outlining specific works, roles, and responsibilities is recommended. From WDC view, it is crucial that the agreement outlines that all costs associated with these upgrades are the sole responsibility of the developer and should be reflected within the conditions set/development agreement terms.

- The upgrades being unplanned, unanticipated, and not included in the Council's long-term plans for growth enablement or Level of Service improvements mean that council would have to further increase its debt without a known timeframe on the recovery and in turn, lead to existing rate payers servicing debt on behalf of developers.
- Given the risk of works can have on existing Council assets, the DA should look to reimburse any and all costs associated with the upgrades to WDC.

Wastewater

Wastewater demand arising from the development requires upgrades to the existing network. These upgrades must form conditions of any approval. As per the WSP wastewater modelling assessment the two feasible options identified were:

- Option 1: Discharge all of the new site development flows to the existing gravity network that discharges into the Racecourse Road Wastewater Pumpstation (WWPS) and upgrade an approximately 1 km length of existing 225mm diameter wastewater gravity pipe to a 300mm diameter size downstream of the Racecourse Road WWPS.

- Option 2: Discharge 80% of the development flows (from the proposed site WWPS) to the Christie Avenue WWPS conveyance route, with the remaining development flows gravity discharging to the Racecourse Road WWPS conveyance route.

  Rising main to extend nominally 640 metres along Ōhaupō road from the site to the existing wastewater manhole near the intersection of Ōhaupō Road and Racecourse Road (Manhole Asset ID 1090999).

Similar to the Water Supply upgrades, all upgrade costs that are agreed to be undertaken by WDC, must be borne by the developer. WDC expect this will also form part of the future Development Agreement that would be necessary.

Transportation

The development can only connect directly to NZTA managed network on Õhaupō Road (State Highway 3) which is classified as a major arterial and limited access road. The only way in which it could connect to local road infrastructure is through the acquisition of additional land from adjoining properties.

No detail on the intersection layout has been provided to WDC for comment within the application. Although WDC has no direct authority as the service provider, we do have concern with the previous applications roundabout design that was shared with NZTA - Waka Kotahi and we believe this design would have significantly impacted the safety and efficiency of the roading network and believe any intersection layout with a high demand such as this development will pose significant risks to the safety and design of the network.

WDC encourage the utmost care be taken to the review of north bound traffic efficiency to ensure impacts such as the potential queuing of heavy vehicles on the steep gradient SH3 road is mitigated, and how that may interact with the safety of expected right turns leaving the site from the private road.

Internal to the site, appropriate tracking curve analysis should be undertaken to determine heavy vehicles and refuse collection can appropriately manage the narrower road corridors and safely traverse internal and external intersections.

General

We trust that the comments are of assistance to the Minister. Please feel free to contact us should you wish to discuss any issues or matters arising from the above points.

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

Managers signoff

Wayne Allan
Group Manager District Growth and Regulatory Services
Waipā District Council

Date: 25 August 2025

Attachments

1. Waipā District Council email to Applicant Agent (February 2025)
2. Retirement Living Market Analysis – Waikato Regional Council and Future Proof Partnership (July 2025)

Attachment 1

Waipā District Council email to Applicant Agent (February 2025)

From: "Peter Skilton"
Sent: Fri, 14 Feb 2025 11:33:54 +1200
To: "Kathryn Drew" s 9(2)(a) [redacted]
Cc: "Wendy Robinson" s 9(2)(a) [redacted]; "Quentin Budd" s 9(2)(a) [redacted]; "Tony Coutts" s 9(2)(a) [redacted]
Subject: PC29 - Activation Discussion

Hi Kath

Our meeting on 11 February 2025, regarding the potential reactivation of PC29 refers.

Development Understandings

We understand that your client is considering his options about moving forward with this project and that this includes either:

- Continuation with the Plan Change Application; or
- Fast track Application and process; or
- Land Use Consent.

With respect to the resultant development of the land in PC29 following any rezoning to Medium Density Residential Zone, it was made clear that:

- It is the intention that the land will solely accommodate senior living / retirement housing; and
- That your client would be responsible for all associated development and construction works; and
- There would be no subdivision where vacant land was on-sold to the market for development outside of the senior living / retirement complex

Council Concerns

As discussed there are a number of concerns that Council Staff have with respect to the proposed rezoning. These specifically relate to:

- The safety and efficiency of traffic (including heaving traffic) on Ōhaupō Road (SH3). This is under the jurisdiction with NZTA and we would expect that NZTA support for the rezoning would be forthcoming as part of the submission process if not before.
- The potential for precedent to be set through creating expectation that developers can bypass the purchase of zoned / development enabled land through speculative purchase of rural land on the understanding that rezoning could occur easily. In this sense there needs to be some unique circumstance associated with the development which ensures that this potential does not eventuate. In light of this it needs to be demonstrated that:
  - The end development represents significant development capacity in terms of criteria set out by Future Proof and the Waikato Regional Policy Statement.
  - The development will not undermine public investment in other live zoned areas in Te Awamutu.
  - There are compelling reasons for why the nature and scale of the development proposed cannot be accommodated within existing growth cells or live-zoned land.

    - The provisions of the National Policy Statement Highly Productive Land, including its pathway for urban rezoning of highly productive land as detailed in Clause 3.6, are unequivocally satisfied.
- The potential for implementation of a ruleset which does not lock in place the development outcomes (i.e. senior living / retirement housing) promoted by the plan change.
- The need to avoid the generation of potential for reverse sensitivity complaint on the operation of farming activities (including orchards) on neighbouring land.

In this sense PC29 as lodged does not contain any provisions that would guarantee the density (40 dwellings per ha) or land use (senior / retirement living) outcomes that have been promoted by the applicant, will actually be achieved. Instead the existing ruleset for the Medium Density Residential Zone remains in place unaltered. This outcome if it continues to apply would not be able to be supported.

In addition to this it was noted that your clients target age bracket is 55 years old and up. This would seem to be a broader market than senior / retirement living. In this respect I note the definition of retirement village provided by the plan which is specific to people in their retirement. If it is your clients intention that the resultant development will not meet what a retirement village is defined as (or notably what the definition says it is not), then any discrepancies would need to be addressed and accounted for by the plan change application. At present it is noted that retirement villages are Restricted Discretionary Activities in the Medium Density Residential Zone.

These are significant hurdles that need to be overcome by PC29. At present the plan change application and the associated documentation that has been submitted does not adequately address or satisfy these concerns.

Process

PC29 is currently on hold pending instruction from the applicant to commence notification.

We understand that you are looking at the original application documents and supporting information with a view to amending them to reflect the intended development outcomes. As discussed we are happy to meet with you to discuss this further if you feel it will be of benefit.

You enquired whether Council would support a standalone land use application or subdivision to enable commencement of development ahead of, or instead of rezoning. As discussed we are not comfortable with and do not encourage this approach to the future development of the land. The plan change would need to be completed in its entirety and the rezoning in place before urban development can occur.

General

At this point in time PC29 in its current form is not able to be supported by Council Staff.

Subject to satisfaction of the key concerns identified above, we understand that both Future Proof and the Waikato Regional Policy Statement provide a pathway for consideration of otherwise unanticipated urban rezoning proposals. Accounting for these documents along with the NPS – HPL will be the key determinant of whether the rezoning promoted by PC29 represents an appropriate outcome.

I trust this fairly represents our discussions. Please feel free to contact me regarding any issues arising from it.

Peter Skilton Team Leader District Plan **Waipā District Council**
s 9(2)(a) | www.waipadc.govt.nz
MOB: s 9(2)(a)

Attachment 2

Retirement Living Market Analysis – Waikato Regional Council and Future Proof Partnership (July 2025)

Retirement living market analysis

Waikato Regional Council and Future Proof Partnership

Final

1 July 2025

Formative

Authors

Rebecca Foy

s 9(2)(a)

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Derek Foy

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1 Introduction

1.1 Background

According to the Retirement Villages Association (**RVA**), "*the under provision of retirement living aged care in New Zealand is at a crisis point, with the growing ageing population facing a significant shortage in appropriate accommodation and care options. The problem is immediate, and demographic changes mean that demand for retirement accommodation and aged care will continue to grow*".[1]

It is estimated that there were 41,100 units housing 54,440 residents in 470 retirement villages nationwide in the December 2023 year end.[2] By 2033 it is anticipated that there will be a shortfall of 8,330 units, increasing to a shortfall of 23,240 units by 2048.[3] Therefore, RVA estimate that at least 10 new large-scale villages will be required across New Zealand each year to keep pace with demand over the next 20 years.

Future Proof Partners (**FPP**) are currently undertaking a workstream assessing the demand for retirement village housing within the Future Proof Area (Waikato District, Matamata-Piako District, Waipā District and Hamilton City). This workstream has arisen due to ongoing pressure for out-of-sequence land development proposals for retirement villages on the periphery of urban/village areas and in un-serviced rural environments, for example in Gordonton, Tamahere, Cambridge, Te Awamutu, West Hamilton (Bryer Farms) and Matamata.

1.2 Objective

The purpose of this report is to provide information to FPP to help understand the current and future pipeline of retirement living supply, and compare that with the potential future demand for retirement villages out to 2048 to help understand how much land will be required to accommodate the land use activity. That understanding will be able to be used in the FPP area to support planning decision relating to retirement village provision.

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[1] Collyns, J., 14 October 2022. Retirement Villages Association New Zealand Submission on publicly notified proposal for policy statement of plan, change or variation – plan change 9

[2] Pelletier, N, 2 September 2024. Retirement village development still not enough to meet demand at www.rnz.co.nz

[3] JLL New Zealand, August, 2024. New Zealand retirement villages whitepaper. New Zealand Retirement Village Database and Aged Care Database year ending December 2023

1.3 Methodology

This assessment has followed three key steps to understand the range of factors influencing retirement village demand in Aotearoa New Zealand and within the Future Proof Area.

First, we have undertaken a literature review of industry reports, submissions, consultants' reports, media articles and opinion pieces. That information has informed some of the assumptions and modelling undertaken to estimate the demand for future retirement village land demand.

Second, to understand the current supply of retirement housing we have sourced data from a range of industry websites such as the Retirement Villages Association, Te Whatu Ora Aged Care Audits of care homes, www.villageguide.co.nz, www.eldernet.co.nz, and various commercial websites for each retirement village or care home provider. We have cross-checked that information with estimates of business activity in ANZSIC Q860100 Aged Care Residential Services recorded in Statistics New Zealand's (**SNZ**) Business Directory 2023 to ensure that we have captured a full picture of the market. Information about the sales prices of current units has been sourced from many of the websites mentioned above and land areas have been sourced from Core Logic data.

To describe future demand for retirement living, we have used SNZ population projections by age for those aged over 65 years old for each territorial authority, and applied current and aspirational market penetration rates, described in more detail in section 4. We have then estimated the number of units and land area required for retirement villages, and assessed the unmet demand that currently exists within the wider Future Proof area, to provide an indication of how many new retirement homes will be required out to 2048.

1.4 Key assumptions

There are several key assumptions that drive the demand assessment, as follows:

- New retirement villages developed post-2025 in Waikato District and Matamata-Piako District will have densities of 20 unit/ha,[4] and those in Waipā[5] and Hamilton[6] will average 25 units/ha and 30 units/ha respectively.
- The average new retirement village will be the size of the current average, which is 7.9ha per village.
- Two penetration rate scenarios are modelled. Under the Status Quo scenario 2% of 65-69 year olds choose to live in retirement villages as they are estimated to do now, while older age cohorts continue to exhibit the same rates as they do now. The average penetration

[4] Current densities range from 6-21 units/ha
[5] Current densities range from 6-89 units/ha with most between the 21-33 units/ha
[6] Current densities range between 8-70 units/ha with most between 28-43 units/ha

for those aged over 70 now is 13.3%, and while each penetration in each cohort wis assumed to remain constant, the average for those aged 70+ increases (to 17.2%) as average age in increases over time. Propensity to live in retirement villages increases with age, from 4% of 70-74 year olds increasing to 50.0% of 90+ year olds.

- Under the higher penetration rate scenario, 5% of 65-69 year olds choose to live in retirement villages from 2023-2048, and the weighted average for 70+ year olds matches the current 15.7% Golden Triangle rate and grows over time to reach 20.3% by 2048, driven by the ageing population. Propensity to live in retirement villages increases with age, 6% for 70-74 year olds increasing to 55% of 90+ year olds.

1.5 Report structure

The report is structured as follows:

- Section 2 provides some background about the key trends, challenge and opportunities for retirement villages in Aotearoa New Zealand.
- Section 3 describes and quantifies the current and future pipeline of retirement living options in each of the Future Proof territorial authorities.
- Section 4 provides scenarios for estimated demand for retirement village and care bed demand out to 2048 for each territorial authority and for the Future Proof area in total.
- Section 5 provides some concluding remarks about the assessment.

2 Retirement village trends

To provide some context about the drivers of retirement village demand on the periphery of urban areas and in rural zones, we have undertaken a literature review to identify the current challenges and opportunities, trends and requirements of retirement housing options in Aotearoa New Zealand. This section provides a brief description about the types of retirement living formats available to older generations and then provides commentary on some of the trends within the sector.

2.1 Retirement housing options

Most people aged 65+ years continue to live in their own homes during retirement, however some choose to move into retirement villages to improve their accessibility to other people as a way of forming social connections, providing accessibility to recreational and medical support facilities, while others are forced to find places to live that can provide care options when health issues arise.

There are a range of retirement living options available, including:

- Stand-alone retirement villages
  - Independent living units (villas, townhouses, or apartments)
  - Assisted living serviced apartments
- Stand-alone 24-hour care facilities
  - Rest homes, including those specialising in dementia care
  - Hospitals
  - Psychogeriatric units
- Pensioner housing, much of which was developed post-World War II, when social policies enabled Councils to access low-interest government loans to build affordable rental housing suitable for pensioners.
- Independent living at residential homes.

CBRE estimates that there were approximately 42,000 units (excluding rentals) in the New Zealand retirement market[7]. This estimate compares with Jones Lang La Salle's Retirement Village database which reported that there were 41,110 retirement village units and 53,440 residents in December 2023. [8] Since 2012 there has been annual average growth of 1,750 units, an in calendar year 2023 some 2,300 units were completed.

[7] Gunn, M, 21 May 2021. Rapid growth in number of retirement units, www.cbre.com
[8] JLL New Zealand, August, 2024. New Zealand retirement villages whitepaper. New Zealand Retirement Village Database and Aged Care Database year ending December 2023.

The RVA is an industry body organisation that was formed in 1989 and represents 407 members, approximately 96% of registered retirement villages. The RVA estimates that in 2022 their members had 38,520 units housing 50,000 people.[9]

There are six large operators in New Zealand (**Big-6**), who collectively own just under half (45.7%) of the retirement villages and 67% of units.[10] The major operators are Ryman (8.5%), Metlifecare (7.9%), Bupa (7.7%) Oceania (7.4%), Summerset (7.4%) and Arvida (6.8%). All other operators account for 54.3% of retirement villages. On average, Big-6 villages average 127 units each, and are 2.35 times larger than other villages (54 units each) in terms of the number of units.[11]

The Waikato Region, which is larger than this report's study area, currently has around 9-10% of the country's units and 11-12% of villages, with the average size being about 75 units per village.

The RVA estimated that approximately 65% of registered retirement villages had some level of aged residential care. There were 40,350 aged care beds across 672 New Zealand locations in December 2023, with 36% of those beds provided by the Big-6, highlighting the role of non-Big-6 companies as providers of aged care facilities.[12] The RVA estimates that approximately 19,300 aged care beds in New Zealand, or 50% of all aged care beds, are a part of retirement villages,[13] with the balance being specialist stand-alone care facilities. Section 3 outlines the range of retirement living options available in the Future Proof area that are not privately-owned dwellings.

2.2 Ownership models

For many retirement villages, residents do not typically own the unit they reside in, but rather purchase the right to occupy the unit,[14] although there are other models that do not operate using this approach. The four types of ownership structure in Aotearoa New Zealand are:

- Occupation rights agreements, whereby the village operator retains the freehold title, and residents enter into an agreement to occupy a unit subject to payment of a capital sum. There are also weekly fees to cover daily operating expenses such as rates and insurance. A deferred management fee is also paid when the resident leaves their unit. In most cases

[9] Collyns, J., 14 October 2022. Retirement Villages Association New Zealand Submission on publicly notified proposal for policy statement of plan, change or variation – plan change 9
[10] Pelletier, N, 2 September 2024. Retirement village development still not enough to meet demand at www.rnz.co.nz
JLL New Zealand, August, 2024. New Zealand retirement villages whitepaper. New Zealand Retirement Village Database and Aged Care Database year ending December 2023.
[11] Ibid
[12] Ibid
[13] Collyns, J., 14 October 2022. Retirement Villages Association New Zealand Submission on publicly notified proposal for policy statement of plan, change or variation – plan change 9
[14] Gunn, M, 7 April 2025. New Zealand senior living favours lease-like model in RICS.

the operator retains any capital gains and is responsible for refurbishing and selling the unit.

- Site payments apply to allow residents to own a dwelling and occupy a defined piece of land, similar to a leasehold arrangement. The resident typically owns any improvements they make and is responsible for the ongoing maintenance.
- Not-for-profit incorporated societies that residents join to be able to occupy a dwelling.
- Rental models. These were traditionally provided by Councils in the form of pensioner flats as a form of social housing but are also available from religious organisations, community housing providers, and Kāinga Ora.

2.3 Trends, challenges and opportunities

Retired people often have a desire to stay in their current communities (ageing in place), and consequently there is demand for new retirement villages in residential neighbourhoods with good access to existing amenities.[15] Many newer retirement villages offer a range of shared facilities for recreation and leisure to encourage social connection, interaction and continuation of healthy lifestyles.

A challenge for retirement village developers is that large sites compatible with medium to high densities can be difficult to acquire in existing residential locations. The average size of retirement villages is indicatively 6ha,[16] though many of the retirement villages in the Future Proof area are larger than this at over 7ha (see section 3). This has led to pressure from the sector to develop retirement villages on the edges of existing urban areas, typically on rural zoned land, where suitably sized blocks of land are able to be acquired in a timely fashion, without needing to amalgamate multiple titles. While urban fringe locations are convenient for operators, there are associated rural character, amenity and other environmental effects associated with rural zoned and peripheral facilities, and issues with social connections and accessibility to goods and services if the sites do not provide them.

Following are some observations relating to the trends, challenges, and opportunities associated with the provision of retirement village housing in Aotearoa New Zealand.

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[15] Hartley, D., and Buchanan, A., 23 April 2020. Planning and Environment Journal Issue 3: Retirement villages in New Zealand – An environment and planning overview. DLA Piper
Birman Consulting Limited, May 2023. Retirement Village Sector Housing Demand Forecasts 2023-2053: A report for the Heretaunga Plains Future Development Strategy

[16] Birman Consulting Limited, May 2023. Retirement Village Sector Housing Demand Forecasts 2023-2053: A report for the Heretaunga Plains Future Development Strategy

2.3.1 Trends

There are a range of trends which have recently been affecting the ability to cater for retirement living in Aotearoa New Zealand, including:

- The quantity of not for profit retirement and aged care units is reducing over time, as the costs of maintenance increase, as evidenced by the sale of all of Hamilton City's pensioner housing stock in 2015.
- Recent trends have seen newly constructed retirement villages get bigger.[17]
- There is growing demand for retirement villages (as opposed to other forms of retirement housing) and supply constraints are meaning that the sector is not building enough places to keep up with demand.[18]
- There is evidence that penetration rates in eight of 13 regions have declined over the last three years,[19] although the national average has remained steady at around 14% of retirement aged people living in retirement villages. Waikato is one of the regions that experienced a decline in market penetration over that period. The RVA expects that penetration rates will grow over time.
- Over the past 20 years, retirement living options have transitioned from lifestyle villages that did not provide care to villages that have a 'continuum of care', for example from independent villas through to hospital and dementia care, allowing residents to age in place once they enter a village.[20] As discussed later, there is, however, a lack of profitability in assisted living and aged care facilities, and while some continuum of care is recognised by the operators as being market-attractive, the lack of profitability appears to be limiting the capacity of these facilities.
- More operators are building serviced apartments, where residents can move as necessary into and out of care in the facility where their apartment is without having to permanently move from their home, for example by having specialist staff visit them in place.[21]
- Some providers have started to focus on the provision of social housing as part of their development model.[22]
- Care-only facilities are becoming increasingly rare due to the capital costs being unjustifiable under current government funding programmes. The RVA claims that no new

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[17] JLL New Zealand, August, 2024. New Zealand retirement villages whitepaper. New Zealand Retirement Village Database and Aged Care Database year ending December 2023.
[18] JLL New Zealand, August, 2024. New Zealand retirement villages whitepaper. New Zealand Retirement Village Database and Aged Care Database year ending December 2023, page 35
[19] Auckland, Waikato, Bay of Plenty, Gisborne, Wellington, Nelson/Tasman/Marlborough, Otago, and Southland.
[20] Collyns, J., 14 October 2022. Retirement Villages Association New Zealand Submission on publicly notified proposal for policy statement of plan, change or variation – plan change 9 https://www.villageguide.co.nz/resource-centre/five-of-the-latest-trends-in-nz-retirement-living
[21] Ibid
[22] Ibid

residential care facilities have been built in the last five years, although some existing facilities have been extended.[23]

- It is unlikely that historic pensioner housing (housing owned by councils, community housing providers and sometimes central government) will continue to be expanded, and numbers of units may instead start to decline due to problems with the financial viability of operating them.[24] Hamilton City Council has already sold off pensioner housing, and trends toward that are also evident elsewhere in New Zealand.
- In the year ended December 2023 there were 860 units built in new Big-6 villages, 950 units in existing Big-6 villages and 490 in non-Big-6 villages. Of the total 2,300 delivered, approximately 105 units were converted from retirement villages into aged care, yielding a net increase in units of just under 2,200.[25]
- It can be more profitable to set a higher minimum age to become a village resident, because older people are not likely to live as long as younger people. The higher average across a village will generate more frequent turnover of residents and units, which means that the operator can take any capital gains and claim the deferred maintenance fees.[26]

2.3.2 Challenges

Challenges associated with the retirement village sector in Aotearoa New Zealand include:

- High interest rates, land and construction costs, driven by inflation and supply chain costs.[27]
- Operational costs have risen rapidly, and in some cases have doubled in less than two years.[28] A consequence of this trend are shortfalls in the weekly fees collected from residents, and some operators have started to transition to new operational fees models.
- A weak residential property market, stalling sales and developments.[29] If retirees are unable to sell the family home, they are often unable to fund relocation to a new home, although that tendency may be reduced over time as there come to be more, smaller warmer, drier and lower maintenance homes available, that suit the needs of older cohorts and provide a viable alternative to retirement villages. If this occurs it could have two main effects. First, there will be reduced need to move into retirement villages,

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[23] Ibid

[24] Birman Consulting Limited, May 2023. Retirement Village Sector Housing Demand Forecasts 2023-2053: A report for the Heretaunga Plains Future Development Strategy

[25] JLL New Zealand, August, 2024. New Zealand retirement villages whitepaper. New Zealand Retirement Village Database and Aged Care Database year ending December 2023.

[26] Birman Consulting Limited, May 2023. Retirement Village Sector Housing Demand Forecasts 2023-2053: A report for the Heretaunga Plains Future Development Strategy

[27] Ibid
blog.expeditreprojects.com/expedite-articles/Retirement-living-trends

[28] Ibid

[29] Ibid

because the difference in liveability between smaller warmer homes and retirement village homes will be reduced. Second, there may changes in equity availability for retirees, as smaller homes yield a lower sales price, reducing the equity retirees have to fund a purchase in a village.

- There have been increasing debt levels for retirement villages arising from higher costs and slower (but still increasing) sales levels,[30] primarily due to a softer residential property market, which delays potential buyers from selling their homes and moving into a village. Higher construction, operating, and financing costs, have also reduced margins and slowed sales.
- A consequence of these financial pressures is that the planned pipeline of national development of 23,000 units by 2033 is likely to stall and a lower number will be provided, meaning that there will be unmet demand.[31] This implies that a deficit of supply is likely toward the affordable end of the spectrum, with financial pressures more readily managed in high price point products.
- Much of the older retirement housing stock was built to accommodate the pre-World War II generation, and that style of living is likely to be unacceptable to the baby boomer generation. Baby boomers are very aware of their heterogeneity and require bespoke options fitting their tastes, they will not be content to live in uniform housing options. [32]
- It is difficult to undertake significant renovations of retirement villages due to existing residents having the right to occupy their units and the process to shift them being complicated. Consequently, operators may have to wait for long periods to reach vacancy levels that would allow them to renovate or alternatively sell assets that do not meet their current portfolio needs. [33]
- Existing supply is decreasing as older style small and poor-quality aged care homes, which are usually conversions of old houses, close.[34]
- Building new large villages are more cost effective and can target higher price points, whereas older villages are likely to be smaller and cater to lower price points.[35] That is not to say that smaller villages are not viable, although recent research highlights the

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[30] Solly, S, 31 March 2025. Harbour Navigator: Retirement village shares – Refreshed? At www.harbourasset.co.nz

[31] Ibid

[32] Bevin, A., 28 February 2024. Uncompromising boomers pose new challenge to retirement villages at www.newsroom.co.nz

Grant, B.C, March 2006. Retirement villages: An alternative form of housing on an ageing landscape in Social Policy Journal of New Zealand (27).

https://www.villageguide.co.nz/resource-centre/five-of-the-latest-trends-in-nz-retirement-living

[33] Bevin, A., 28 February 2024. Uncompromising boomers pose new challenge to retirement villages at www.newsroom.co.nz

[34] Collyns, J., 14 October 2022. Retirement Villages Association New Zealand Submission on publicly notified proposal for policy statement of plan, change or variation – plan change 9

[35] Ibid

challenges of the retirement villages sector for smaller operators who are unable to spread risk across multiple sites.[36] It is also not to say that larger villages can leverage an economy of scale and offer more affordable options.

- Apartment complexes would need to be located in places near points of social or cultural interest and have access to nearby open spaces.[37]
- Proximity to bus routes may be desired by some residents that do not live in villages with other private transport options,[38] may be imperative for others, and is likely to change over time as residents' ability to drive changes.
- Identifying suitable brownfield redevelopment options that are not surrounded by incompatible land uses, for example activities that generate excessive noise or compromise safety and security for residents.[39]
- Retirement villages tend to be larger (in height and bulk) than traditional residential housing, and reverse sensitivity issues may arise during consenting.[40]
- The RVA maintains that retirement villages may be suitable in non-residential zoned areas, such as commercial and city centre zones due to enabling a mix of activities on one site.[41] Obtaining sites that are large enough to support retirement villages may be challenging, and the viability of vertical villages will vary with zoning rules, height limits, and the degree of parcel ownership fragmentation.
- Retirement villages are attractive to a small market of "relatively high-wealth older homeowners" because homeowners require extra capital and income sufficient to pay ongoing fees.[42]
- Increasing longevity, which is being driven by advances in medical technology and heightened survival rates from life-threatening diseases, means that there will be more people needing retirement living options.[43]
- There is likely to be a shortage of aged care beds, because these are typically provided by non-Big-6 providers, and there are few incentives to invest in beds, whether it is through upgrades, building extensions or new builds.[44] The difference between the Big-6's share

[36] Grant Thornton, June 2025. The Path to Profitability, Separating fact from fiction in New Zealand's retirement village sector.
[37] Birman Consulting Limited, May 2023. Retirement Village Sector Housing Demand Forecasts 2023-2053: A report for the Heretaunga Plains Future Development Strategy
[38] Ibid
[39] Ibid
[40] Collyns, J., 14 October 2022. Retirement Villages Association New Zealand Submission on publicly notified proposal for policy statement of plan, change or variation – plan change 9
[41] Ibid
[42] Hackell, M., May 2025. Retirement villages and the housing needs of older Waikato residents: Current and future trends.
[43] Collyns, J., 14 October 2022. Retirement Villages Association New Zealand Submission on publicly notified proposal for policy statement of plan, change or variation – plan change 9
[44] Pelletier, N, 2 September 2024. Retirement village development still not enough to meet demand at www.rnz.co.nz

of all retirement village units (66%) and their share of care beds (36%)[45] supports an observation by the CEO of the Aged Care Association that the "Big 6 are seen to be mostly building aged care units for existing residents within their retirement village facilities." [46] The Aged Care CEO also notes that non-Big-6 operators "have little incentives to invest in their aged care beds, whether it is an upgrade, an extension to existing facilities, or a new build.[47] Recent research concludes that "Assisted living facilities rarely turn a profit, and aged care facilities almost always run at a loss. But, without the continuum of care on offer, it's hard to sell units."[48]

- While the JLL research shows that most Big-6 villages have aged care facilities, and therefore the facility to transition exists in theory, the capacity may not exist in practice, and the marketing of the availability of continuity of care may not match the availability of an aged care bed when a village resident requires it.
- Staffing constraints in a tight labour market make it difficult to recruit and retain skilled personnel, especially for specialised care roles.[49]
- Changes to regulatory requirements add complexity and costs.[50] This was evidenced in the ongoing debates surrounding calls to review the Retirement Villages Act 2003 due to concerns about the balance of power between operators and consumers including how long it can take to resell a property after relocation or death, the proportion of capital gain retained, weekly fees continuing to be charged once units had been vacated and overly complicated complaints systems and legal agreement documents.[51] The industry body claimed that changes could reduce consumer choice, increase costs for residents, curtail new developments and result in some smaller village operators becoming insolvent.
- The RVA indicates that it takes approximately 10 years to develop a new village, but that resource consenting can delay projects.[52] In particular the RVA mentions that there are opportunities to internalise potential impacts of intensification on large sites rather than

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45 JLL New Zealand, August 2024. New Zealand retirement villages whitepaper. New Zealand Retirement Village Database and Aged Care Database year ending December 2023, page 41
46 Ibid page 43
47 Ibid
48 Grant Thornton, June 2025. The Path to Profitability, Separating fact from fiction in New Zealand's retirement village sector.
49 blog.expeditreprojects.com/expedite-articles/Retirement-living-trends
50 Ibid
51 Government urged to review retirement village rules - Local Matters
Retirement commissioner Jane Wrightson urges urgent retirement village sector review - NZ Herald
Retirement Villages Association pushes back on mandatory timeframe for payouts | RNZ News
Calls for overhaul of law governing retirement villages | RNZ News
Retirement Village Law under Review | Hesketh Henry
52 Collyns, J., 14 October 2022. Retirement Villages Association New Zealand Submission on publicly notified proposal for policy statement of plan, change or variation – plan change 9
https://www.villageguide.co.nz/resource-centre/social-benefits-of-retirement-villages

creating effects for neighbours. They suggest this can be done by locating higher buildings towards the centre of land parcels without creating adverse dominance, shading and privacy effects.

2.3.3 Opportunities

Notwithstanding the challenges identified, there are also many opportunities present in the retirement village sector.

- Retirement villages serve an important social function by preventing social isolation and improving quality of life through provision of a range of ancillary facilities.[53] Retirement villages are increasingly operating with broader ties to the wider community.[54]
- Another advantage for ageing populations is that maintenance people are readily available to care for residents' homes, and assisted living staff and hospital care is also (often) available on-site.[55]
- The majority (87%) of retirement communities offer wellness programs and on-site healthcare.[56]
- Villages are incorporating long-term design elements such as wider doorways, reinforced grab bars in bathrooms, and adaptable kitchens.[57] Changes to technology, such as remote control of heating and lighting, artificial intelligence that helps detect falls and other health concerns, and access to telehealth consultations mean that incorporating these into retirement villages may make them attractive to a larger share of the population.[58] These changes could also be incorporated into independent housing outside of retirement villages, although capital costs will be a barrier to change, which in some cases can involve expensive structural alterations. Positive design elements would be more easily incorporated into new builds, although again will come with an associated cost that developers may oppose.
- Currently, many older residents are living in housing that no longer suits their needs, such as large family houses, homes that are difficult to maintain and heat, homes with mobility issues such as stairs or being built on hills, or housing that is too far from essential goods

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[53] Grant, B.C, March 2006. Retirement villages: An alternative form of housing on an ageing landscape in Social Policy Journal of New Zealand (27).
blog.expeditreprojects.com/expedite-articles/Retirement-living-trends
[54] https://www.villageguide.co.nz/resource-centre/five-of-the-latest-trends-in-nz-retirement-living?utm_source=chatgpt.com
[55] Grant, B.C, March 2006. Retirement villages: An alternative form of housing on an ageing landscape in Social Policy Journal of New Zealand (27).
[56] blog.expeditreprojects.com/expedite-articles/Retirement-living-trends
[57] blog.expeditreprojects.com/expedite-articles/Retirement-living-trends
[58] Ibid
https://www.villageguide.co.nz/resource-centre/five-of-the-latest-trends-in-nz-retirement-living

and services.[59] Villages offer opportunities to avoid many or all of these issues, as do new residential housing in the general property market, such as apartments or other typologies with minimal grounds and low maintenance buildings.

- Growing ethnic diversity amongst resident populations may provide opportunities to tailor villages to specific cultural requirements.[60] However, if such tailoring does not occur, ethnic populations may be less likely to choose to live in retirement villages, meaning that if demand projections do not take this into account they may overestimate total demand for retirement village space.
- Women are more likely to move into villages than men and make up an average of two-thirds (or more) of residents in a typical retirement village.[61]
- In 2022 many RVA member villages had wait lists of more than two years, and the number of villages with wait lists was increasing, indicating opportunities for additional supply was strong.[62] By 2025 that has changed, with increased construction costs and a softer residential property market creating a bottleneck, slowing retirement village sales even as demand remains strong. So while there has been a recent slowdown in turnover, demand remains strong.
- Perceptions of what villages are like to live in are becoming more positive as new services are developed.[63]
- Sustainability is becoming an important new focus for the industry, including establishing environmental, social and governance policies and for some, attaining Homestar qualifications. This means focussing on solar power, improved water conservation, efforts to reduce carbon usage and food waste, and providing access to electric vehicles.[64]

Some of the challenges documented are also opportunities for the sector, while some of the opportunities can also be challenges to innovate the retirement village product. It is clear from the literature that there are increasing trends towards living in retirement villages as the population ages, and a new cohort of baby boomers reach the age of needing retirement living options. The retirement village sector is facing a number of macro-economic challenges which may stymy development, though the industry association group also points to planning and regulation controls making development of retirement villages more difficult.

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[59] Collyns, J., 14 October 2022. Retirement Villages Association New Zealand Submission on publicly notified proposal for policy statement of plan, change or variation – plan change 9
[60] blog.expeditreprojects.com/expedite-articles/Retirement-living-trends
[61] Birman Consulting Limited, May 2023. Retirement Village Sector Housing Demand Forecasts 2023-2053: A report for the Heretaunga Plains Future Development Strategy
[62] Collyns, J., 14 October 2022. Retirement Villages Association New Zealand Submission on publicly notified proposal for policy statement of plan, change or variation – plan change 9
[63] Ibid
[64] https://www.villageguide.co.nz/resource-centre/five-of-the-latest-trends-in-nz-retirement-living

3 Retirement village supply

This section describes the range of retirement living options available, and planned, in each of the Future Proof territorial authorities. For each location, the range of options are mapped and described in terms of the number of units and care beds, indicative pricing, as well as land areas for each facility.

3.1 Waikato District

There are 11 retirement living options in Waikato District, including five independent living villages with rest homes and hospitals, three rest home and hospital care options and three locations for pensioner housing available to rent from Council.

Independent living villages are located in Te Kauwhata, Matangi, Rotokauri, and Tamahere, with the largest being the 30.2ha Tamahere Country Club (which is still under construction), followed by the 13.0ha Aparangi Village in Te Kauwhata. The three other villages in Rotokauri, Matangi and Tamahere are all in the range of 6.5-8.5ha. There are also three rest home/hospital care facilities, in Huntly, Raglan, and Te Kowhai (Figure 3.1).

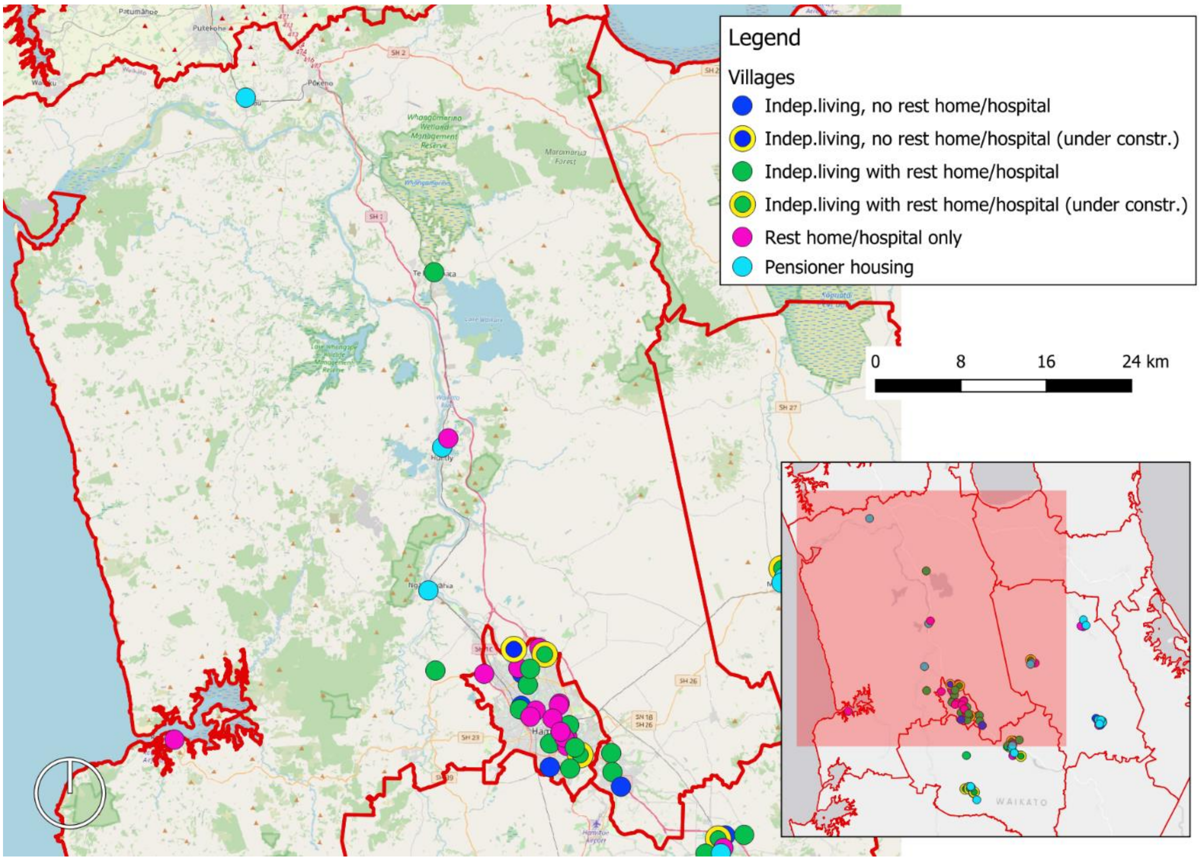
In total there are an estimated 51 one-bedroom apartments, 588 villas, and 485 care beds in the District. Tamahere Eventide Home and Village has 28 one-bedroom apartments, 99 two-bedroom villas and nine three-bedroom villas, while supply in the Tamahere Country Club is dominated by villas (205) with only 23 apartments. There is less detailed information available about the size of the villas available at the Aparangi Village (122 villas total) and Atawhai Assisi Home (46 villas total).

Table 3.1: Waikato District retirement living opportunities

Retirement Living Option	Suburb/ Town	Land area (ha)	Minimum age	Estimated total number units		
				Apartments	Villas	Care beds
Independent Living, Rest home and Hospital care						
Aparangi Village	Te Kauwhata	13.0	65	-	122	59
Atawhai Assisi Home and Hospital	Matangi	7.0	55	-	46	86
Tamahere Eventide Home and Village	Tamahere	6.5	55	28	108	107
Tamahere Country Club*	Tamahere	30.2	65	23	205	80
Perrinpark Retirement Village	Rotokauri	8.5	55	-	73	-
Rest home and Hospital care						
Kimihia Home and Hospital	Huntly	1.8	not spec	-	-	76
Raglan Rest Home and Hospital	Raglan	0.8	All	-	-	36
Brylyn Residential Care	Te Kowhai	2.0	All	-	-	41
Council pensioner rental housing						
Waikato District Council	Tuakau	1.9	65	-	12	-
Waikato District Council	Huntly	0.4	65	-	14	-
Waikato District Council	Ngāruawāhia	0.2	65	-	8	-
Total		**72.4**		**51**	**588**	**485**

**under construction*

Figure 3.1: Waikato District retirement living opportunities map



There is also limited information available about the sales price of units at each of the retirement villages, although indicative price ranges are as follows:

- Tamahere Country Club
  - One and two bedroom villas around $1.8-1.9m
- Perrinpark Retirement Village
  - Two-bedroom villas, $500,000
- Aparangi Village, Te Kauwhata
  - One-bedroom villas, $299,000-$315,000
  - Two-bedroom villas, $460,000-$749,000
  - Three-bedroom villas, $720,000-$860,000
- Tamahere Eventide Home and Village, Tamahere
  - One-bedroom apartments, $300,000-$390,000
  - Two-bedroom villas, $575,000-$670,000

The daily care costs for care beds are available for only two facilities:

- Brylyn Residential Care, Te Kowhai, $184-$224
- Kimihia Home and Hospital, Huntly, $290-$405.

Four of the villages all operate under Occupation Right Agreements, with only Perrinpark offering freehold units. There is some information available about maintenance and service and deferred management fees in the Occupation Rights villages, three of which enable residents to accrue some capital gain on their home, with Aparangi Village returning 100% and Atawhai Assisi and Tamahere Eventide returning 80% of the capital gain to residents.[65] Tamahere Country Club does not enable residents to accrue any capital gain. The range of additional facilities is extensive at the Tamahere Country Club,[66] but relatively limited in the other villages and care homes, with some offering libraries, cafes, bowling greens, visits from health and personal services (such as hairdressers), and resident trips. Nurse support was available at all villages and rest homes, except Aparangi Village.

3.2 Hamilton City

There are 26 retirement living options in Hamilton City, including seven independent living villages either completed or under construction, 10 independent living villages with rest homes and hospitals, and nine rest home and hospital care options (Table 3.2). There is no pensioner housing offered by Hamilton Council which sold off that housing stock in 2016.

Some of the independent living villages and rest homes are new or being constructed on the outskirts of Hamilton City, such as the Broadwater Retirement Village Peacocke (8.48ha), Karaka Pines Rototuna (4.6ha) and Rototuna Village (3.1ha) (Figure 3.2). Other villages are located in suburban Hamilton and range in size from 1.1ha (Arvida Cascades Retirement Resort) through to 8.4ha (Linda Jones Retirement Village).

Table 3.2 shows the approximate number of units and care beds available in each type of facility, although for one retirement village that is under construction, Broadwater Retirement Village, capacity is provided only in aggregate for apartments, villas and care beds for the entire complex. Across all of Hamilton City there are estimated to be 740 apartments, 1,560 villas and 1,460 care beds, mostly already constructed, although three villages are currently under construction.

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[65] Both of these villages are owned by the Tamahere Eventide Home Trust, which is associated with the Methodist Church, https://www.nzherald.co.nz/sponsored-stories/retirement-village-returns-80-per-cent-of-future-fvm/WLOUX2D5BVGK7GI2NQWDZYQRZI/

[66] which offers a movie theatre, library, pool table, café, bar, piano room, massage room, care centre, hobby shed/workshop, arts and crafts, bowling green, croquet lawn, swimming pool, spa, sauna, gym, golf putting, and tennis courts

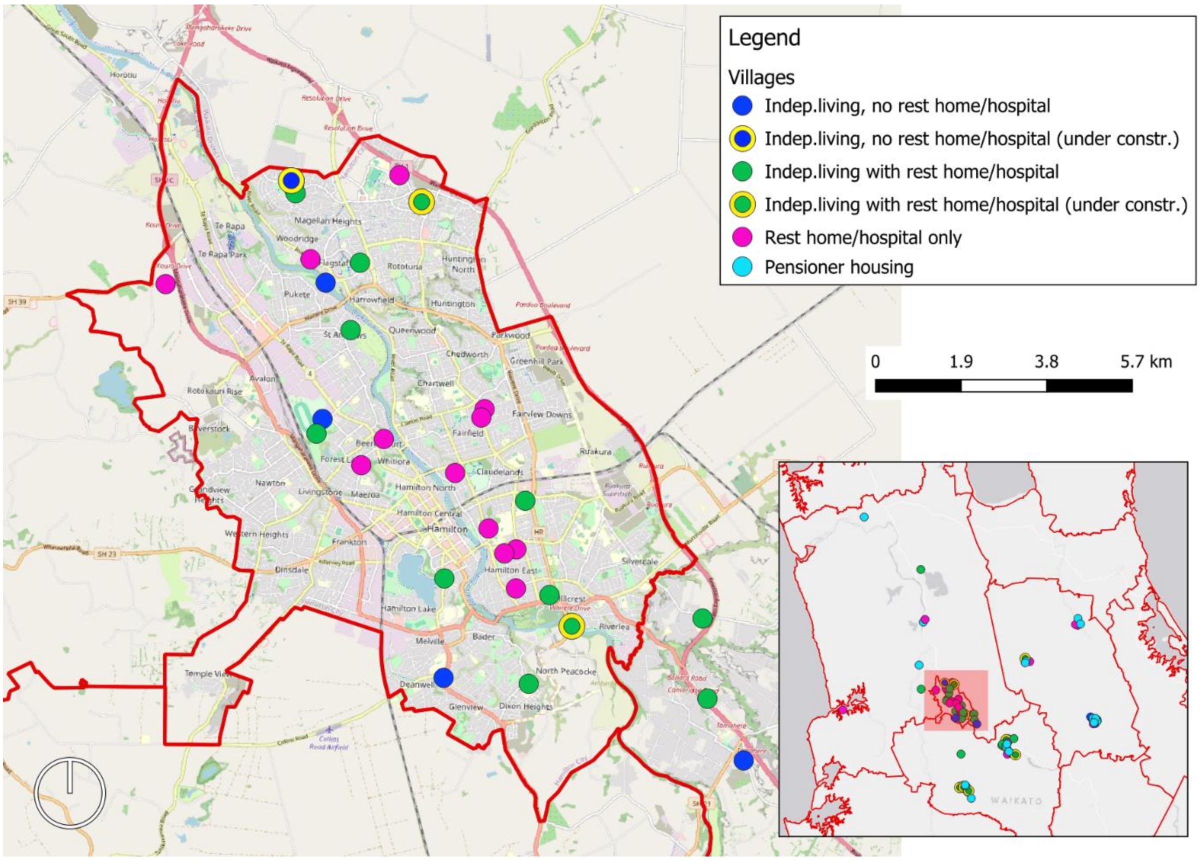
Table 3.2: Hamilton City retirement living opportunities

Retirement Living Option	Suburb/ Town	Land area (ha)	Minimum age	Estimated total number units		
				Apartments	Villas	Care beds
Independent Living						
Alandale Retirement Village	Flagstaff	7.2	65	-	133	-
Forest Lakes Gardens	Te Rapa	5.6	70	111	53	-
Keston Mews Life Stylers Village	Flagstaff	2.2	55	-	-	-
Roseland Park Village	Hamilton East	1.8	60	-	54	-
Netherville Retirement Village	Flagstaff	6.0	55	-	103	-
Karaka Pines Rototuna*	Flagstaff	4.6	65	-	141	-
Te Mauri Paihere ki Mangakootukutuku*	Melville	0.1	not spec	-	47	-
Independent Living, Rest home and Hospital care						
Arvida Cascades Retirement Resort	Hamilton Lake	1.1	65	38	-	106
Foxbridge Retirement Village and Care Home	Te Rapa	2.9	70	26	53	88
St Andrews Retirement Village and Care Home	Saint Andrews	1.4	70	62	-	40
Hilda Ross Retirement Village	Hamilton East	7.4	70	106	167	65
Summerset down the Lane	Tamahere	6.6	70	50	233	99
Linda Jones Retirement Village	Flagstaff	8.4	70	100	150	116
Awatere Retirement Village	Beerescourt	2.4	70	171	-	91
Summerset Rototuna	Rotoruna North	6.4	70	76	192	119
Rototuna Village*	Rototuna	3.1	70	-	-	119
Broadwater Retirement Village **	Peacocke	8.5	not spec		235	
Rest home and Hospital care						
Eventhorpe Care Home	Hamilton East	0.6	not spec	-	-	91
Rossendale Care Home	Enderley	0.7	not spec	-	-	83
Eastcare Residential Home	Hamilton East	0.2	not spec	-	-	47
Radius Glaisdale	Flagstaff	0.7	not spec	-	-	80
Radius Kensington	Maeroa	0.6	All	-	-	96
Radius St Joans Care Centre	Fairfield	1.4	not spec	-	-	92
Roselea Specialised Dementia Care	Claudelands	0.2	not spec	-	-	30
Steele Park Home	Hamilton East	0.3	not spec	-	-	42
Wilson Carlile Village	Hamilton East	0.9	70	-	-	59
Total		**81.3**		**740**	**1,561**	**1,463**

**under construction*

***distribution of apartments and villas unspecified*

Figure 3.2: Hamilton City retirement living opportunities map



The largest apartment complexes are at Awatere Retirement Village, Beerescourt (171), Forest Lakes Gardens, Te Rapa (111), Hilda Ross Retirement Village, Hamilton East (106), and Linda Jones Retirement Village, Flagstaff (100).

The largest villages by number of apartments and villas are:

- Summerset down the Lane (50 apartments, 233 villas, 99 care beds)
- Hilda Ross Retirement Village in Hamilton East (106 apartments, 167 villas, 65 care beds)
- Summerset Rototuna (76 apartments, 192 villas, 119 care beds)
- Linda Jones Retirement Village in Flagstaff (100 apartments, 150 villas, 116 care beds)
- Broadwater Retirement Village in Peacocke (indicatively 235 units).

The largest care homes are located in the independent living villages: Summerset Rototuna (119 care beds), Rototuna Village (119 care beds), Linda Jones Retirement Village (116), and Arvida Cascades Retirement Resort, Hamilton Lake (106), although the nine specialist rest homes and hospital care facilities average around 70 care beds each.

Table 3.3: Sales prices for retirement living options in Hamilton City (May/June 2025)

Retirement Living Option	Apartment - 1 bdrm	Apartment - 2 bdrm	Villa - 1 bdrm	Villa - 2 bdrm	Villa -3 bdrm
Awatere Retirement Village	$280k	$325-$710k	n/a	n/a	n/a
Summerset down the Lane	$340-$352k		$510k	$560-$595k	$595k
Hilda Ross Retirement Village	$399k			$685k	
Summerset Rototuna	$395-$415k			$695-$815k	$895k
St Andrews Retirement Village and Care Home	$510k		n/a	$513k	n/a
Alandale Retirement Village	n/a	n/a		$520-$840k	$559k
Forest Lakes Gardens	$499k			$640-$667k	n/a
Netherville Retirement Village	n/a	n/a	n/a	$619-$649k	$599k-$750k
Roseland Park Village	n/a	n/a		$645k	
Foxbridge Retirement Village and Care Home	$499			$689k	n/a
Linda Jones Retirement Village	$540k	$685-$790k		$815-$865k	
Karaka Pines Rototuna	n/a	n/a		$895k-$1.07m	$1.07m

Some of the retirement villages operate under either an Occupation Right Agreement or a Licence to Occupy arrangement, and for some it is unclear what the arrangements are, though some have information about maintenance and service and deferred management fees. Alandale Retirement Village and Keston Mews Life Stylers Village both have unit title ownership arrangements, which means that residents accrue capital gains. Other retirement villages that allow capital gains include Arvida Cascades Retirement Resort, Radius Glaisdale, Metlifecare Rototuna Village, Karaka Pines Rototuna, Roseland Park Village and Netherville Retirement Village.

The range of additional facilities varies with some only providing healthcare visits, haircuts and nurse support and others at higher price points providing a more extensive range of facilities.

3.3 Matamata-Piako District

There are 12 retirement living options in Matamata-Piako District, including four independent living villages with rest homes and hospitals, five rest home and hospital care options and three locations for pensioner housing available to rent from Council.

The independent living villages are located in Matamata and Morrinsville, with the largest being 21.4ha (Matamata Country Club), followed by Matamata Longlands (11.7ha), Lockerbie Retirement Village in Morrinsville (8.1ha) and Radius Matamata Country Lodge (3.7ha) (Table 3.4, Figure 3.3 and Figure 3.4).

In total there are an estimated 298 apartments and villas and 315 care beds. There is little information publicly available about the size of the villas available at each of the villages, with the exception being that Radius Matamata Country Lodge, which has 18 one-bedroom apartments and 40 two-bedroom villas.

Table 3.4: Matamata-Piako District retirement living opportunities

Retirement Living Option	Suburb/Town	Land area (ha)	Minimum age	Estimated total number units		
				Apartments	Villas	Care beds
Independent Living, Rest home and Hospital care						
Matamata Country Club	Matamata	21.4	55	-	132	-
Matamata Longlands	Matamata	11.7	50	242		-
Radius Matamata Country Lodge	Matamata	3.7	50	18	40	99
Lockerbie Retirement Village*	Morrinsville	8.1	65	Not spec		60
Rest home and Hospital care						
Pohlen Hospital Trust Board	Matamata	1.2	All	-	-	29
Kingswood Rest Home	Matamata	0.3	not spec	-	-	41
Kingswood Rest Home	Morrinsville	0.3	not spec	-	-	76
Kenwyn Rest Home and Hospital	Te Aroha	0.7	not spec	-	-	59
Te Aroha and District Community Hospital	Te Aroha	3.6	All	-	-	50
Council pensioner rental housing						
Matamata Piako District Council	Matamata	0.9	65			
Matamata Piako District Council	Morrinsville	0.6	65	-	108	-
Matamata Piako District Council	Te Aroha	0.6	65			
Total		**53.2**		**298**		**315**

**under construction*

Figure 3.3: Matamata retirement living opportunities map

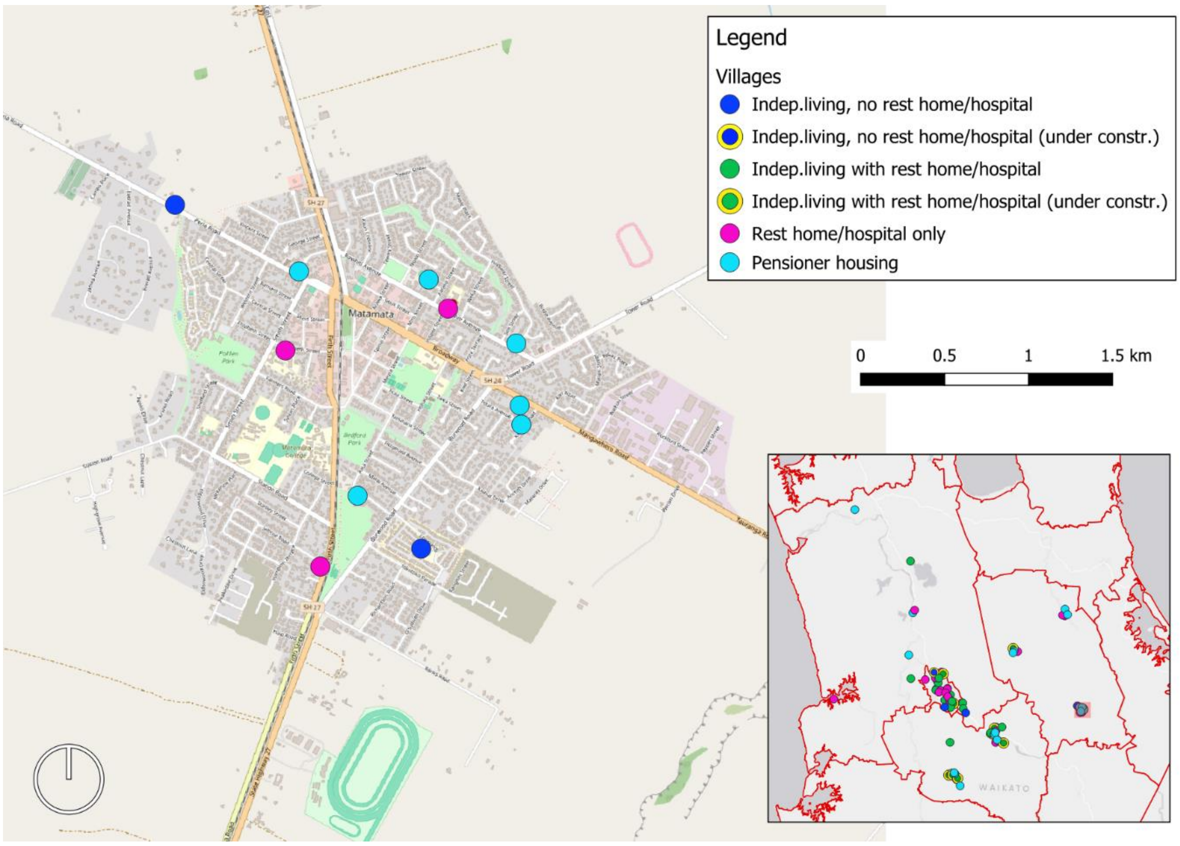
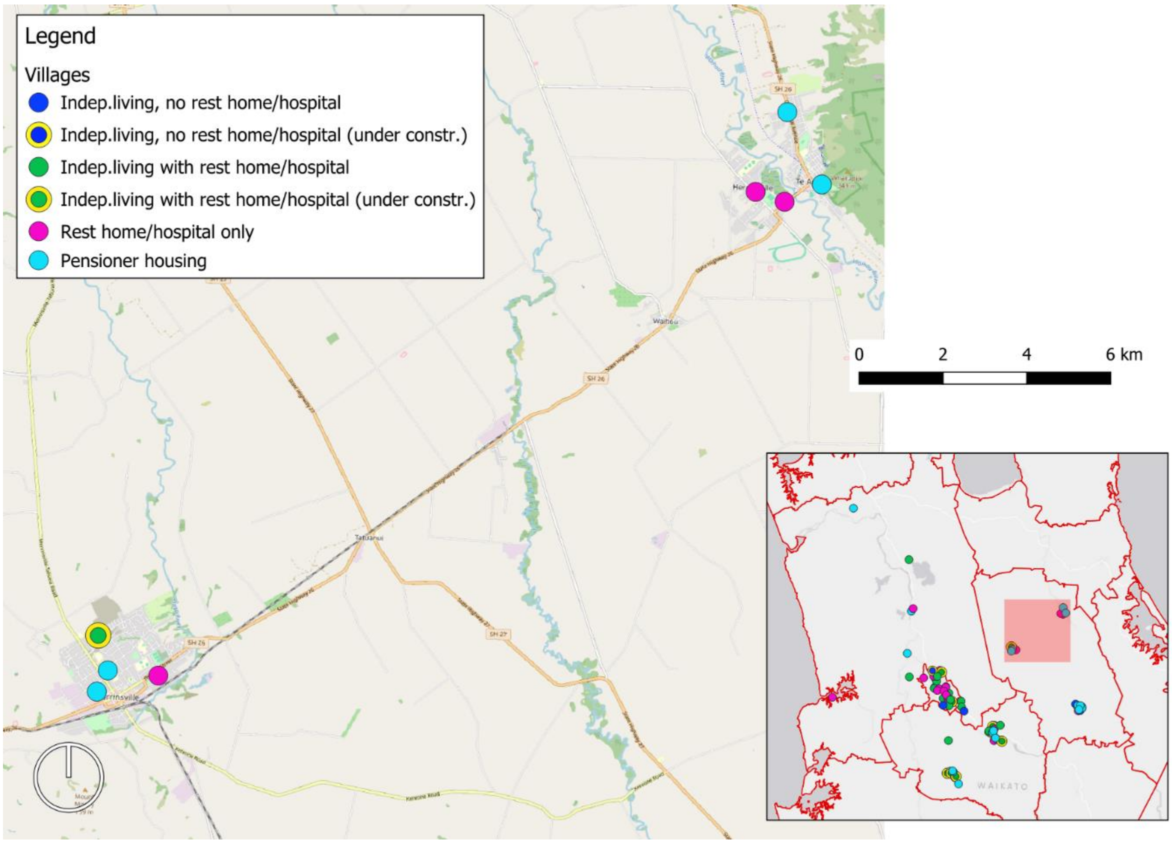


Figure 3.4: Morrinsville-Te Aroha retirement living opportunities map



There is also limited information available about the sales price of units at each of the retirement villages as they are currently being marketed. Information that is available includes the following price indications:

- Matamata Country Club
  - Two-bedroom villas, $799,000-$1,455,000
- Matamata Longlands
  - One-bedroom villas, $345,000-$560,000
  - Two-bedroom villas, $630,000-$799,950
  - Three bedroom villas $720,000-$840,000
- Radius Matamata Country Lodge
  - One-bedroom apartments, $440,000-$495,000
  - Two-bedroom villas, $495,000-$580,000
- Lockerbie Retirement Village, Morrinsville
  - Two-bedroom villas, $820,000-$825,000
  - Three bedroom villas $999,000-$1,110,000.

Some of the retirement villages operate under an occupation right agreement, and for some it is unclear what the arrangements are, though some have information about maintenance and service and deferred management fees. It is unclear whether any of the villages enable residents to accrue capital gain on their home, although the dominant approach in the retirement village business model is that the operator receives most, any in many cases all, of the capital gain via the occupation right agreement. The range of additional facilities is extensive at Matamata Country Club, for example movie theatre, library, pool table, café, bar, piano room, massage rooms, care centres, treatment rooms, hobby sheds, arts and craft rooms, bowling green, health spa/wellness clinic, spa and sauna. The others have a more limited range of activities such as bowling greens, swimming pools, libraries, hair salons, visiting healthcare services, nurse support, and bus/van trips.

3.4 Waipā District

There are 21 retirement living options in Waipā District, including 11 independent living villages with rest homes and hospitals, seven rest home and hospital care options and three broad locations for pensioner housing available to rent from Council.

Most of the district's independent living villages are located in Cambridge, while the other three independent living facilities are located in Te Awamutu (two) and Ōhaupō (Table 3.5).

Table 3.5: Waipā District retirement living opportunities

Retirement Living Option	Suburb/Town	Land area (ha)	Minimum age	Estimated total number units		
				Apartments	Villas	Care beds
Independent Living, Rest home and Hospital care						
Cambridge Resthaven	Cambridge	2.0	65	-	102	107
Te Awa Lifecare Village	Cambridge	19.7	70	36	74	78
Arvida Lauriston Park	Cambridge	7.8	65	-	120	63
Bupa St Kilda Retirement Village	Cambridge	5.6	70	19	99	80
Cambridge Oaks**	Cambridge	8.1	50	100	104	-
Metlifecare St Andrew's**	Cambridge	2.0	70	11	54	24
Summerset Cambridge* **	Cambridge	8.0	70	130	130	?
Patrick Hogan Retirement Village	Cambridge	8.6	70	60	185	-
Radius Windsor Court Rest Home	Ohaupo	2.7	70	-	22	76
Arvida Retirement Community/Whai Mauri Ora	Te Awamutu	2.0	65	-	180	?
Highfield Country Estate	Te Awamutu	13.3	65	-	166	60
Rest home and Hospital care						
Resthaven on Burns Street	Cambridge	0.6	not spec	-	-	48
Ultimate Care Cambridge Oakdale	Cambridge	0.4	not spec	-	-	47
Cambridge Life	Cambridge	0.4	not spec	-	-	57
Camellia Resthome	Te Awamutu	0.2	not spec	-	-	30
San Michele Home and Hospital	Te Awamutu	0.2	All	-	-	29
Te Ata Rest Home	Te Awamutu	0.4	not spec	-	-	29
CHT Te Awamutu Home and Hospital	Te Awamutu	0.8	not spec	-	-	60
Council pensioner rental housing						
Waipa District Council	Cambridge	1.9	65	-	58	-
Waipa District Council	Kihikihi	0.7	65	-	14	-
Waipa District Council	Te Awamutu	0.4	65	-	10	-
Total		**24.0**		**356**	**1,318**	**788**

**under construction*
***distribution of apartments and villas unspecified*
cells coloured grey are estimates

The largest villages by land area are Te Awa Lifecare Village (19.7ha), and Highfield Country Estate (13.3ha), with five others ranging between 5.5-9.0ha, and three being approximately 2-3ha. There are seven rest homes with hospital care, three in Cambridge and four in Te Awamutu. There are some pensioner flats available in Cambridge, Kihikihi, and Te Awamutu (Figure 3.5 and Figure 3.6).

In total there are an estimated 360 apartments, 1,320 villas and 790 care beds in Waipā district, including in Summerset Cambridge (under construction). There is little information publicly available about the size of the villas available at each of the villages. The largest villages by number of apartments and villas are:

- Summerset Cambridge (an estimated 130 apartments, 130 villas, and an unknown number of care beds)
- Patrick Hogan Retirement Village in Cambridge (60 apartments, 185 villas)
- Cambridge Oaks (100 apartments, 104 villas)
- Arvida Retirement Community/Whai Mauri Ora (180 villas, and an unknown number of care beds).

Figure 3.5: Cambridge retirement living opportunities map

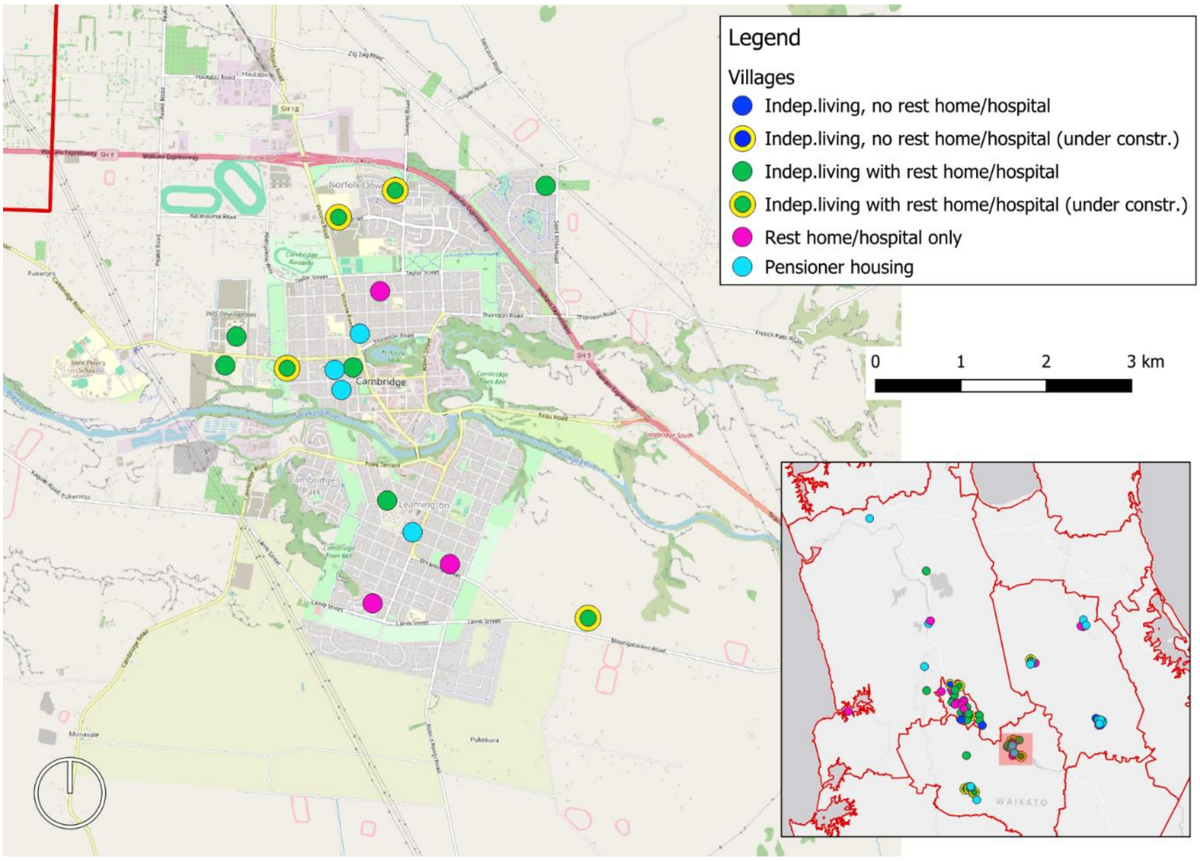
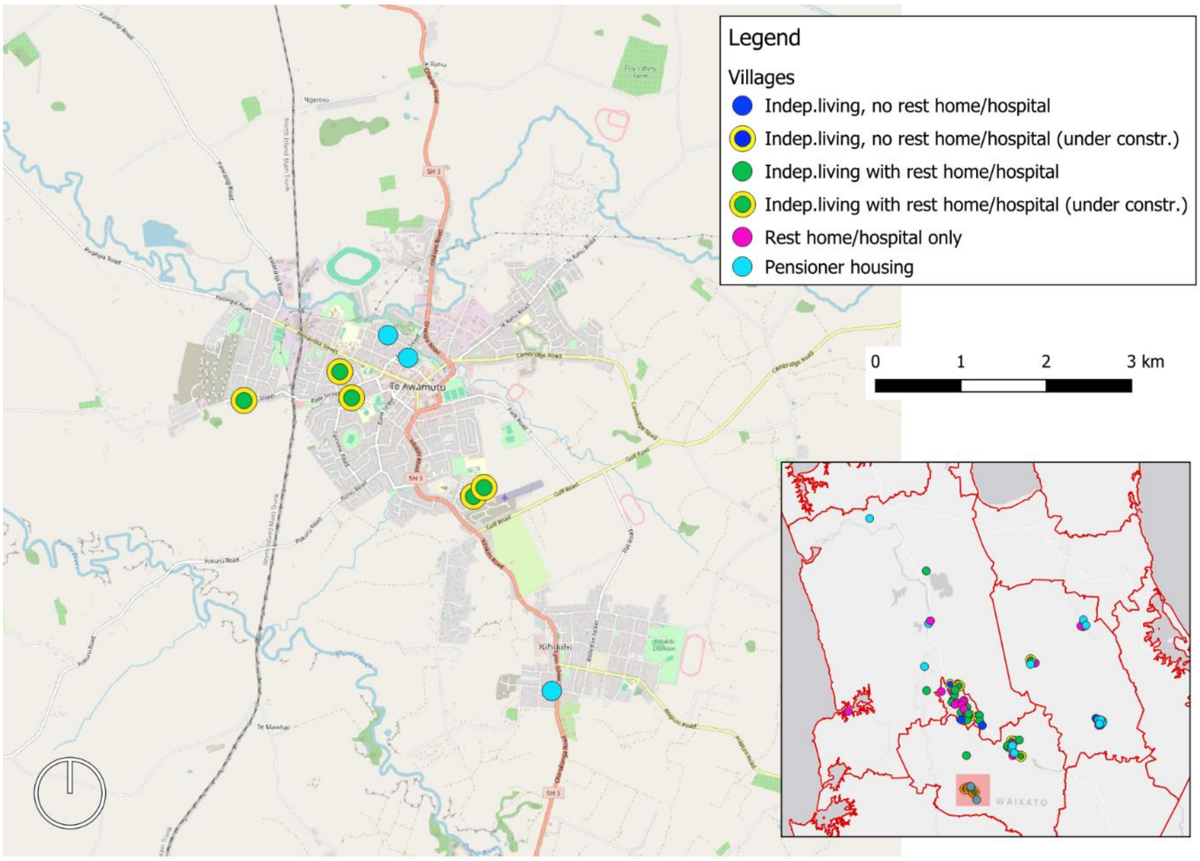


Figure 3.6: Te Awamutu retirement living opportunities map



There is scant information available about the sales price of units at each of the retirement villages as they are currently being marketed in Waipā, available information is identified in Table 3.6. There are a few options available at lower price points currently available at Highfield Country Estate (Te Awamutu), Metlifecare St Andrews (Cambridge) and Radius Windsor Court Rest Home (Ohaupo). There are mid-range villas at many of the Cambridge options including Bupa St Kilda Retirement Village, Cambridge Oaks, Cambridge Resthaven, Summerset Cambridge, and Patrick Hogan Retirement Village. Larger and more expensive homes are available at Patrick Hogan Retirement Village (Cambridge) and Arvida Retirement Community in Te Awamutu.

Table 3.6: Sales prices for retirement living options in Waipā District (May/June 2025)

Retirement Living Option	Apartment - 1 bdrm	Villa - 2 bdrm	Villa -3 bdrm
Highfield Country Estate	n/a	$350-$595k	
Metlifecare St Andrew's		$499k	
Radius Windsor Court Rest Home	n/a	$550k	
Bupa St Kilda Retirement Village	$405-$495k	$585-$680k	n/a
Cambridge Oaks	n/a	$689-$745k	$830k
Cambridge Resthaven	n/a	$670-$730k	
Summerset Cambridge		$720-$760k	$760k
Arvida Lauriston Park	n/a	$735-$835k	$1.04m
Patrick Hogan Retirement Village		$735-$840k	$1.04-$1.20m
Arvida Retirement Community/Whai Mauri Ora	n/a	$925k-$1.15m	$1.20m

Some of the retirement villages operate under either an Occupation Right Agreement or a Licence to Occupy arrangement, and for some it is unclear what the arrangements are, though some have information about maintenance and service and deferred management fees. It is unclear whether any of the villages enables residents to accrue capital gain on their home, with the exception of the Cambridge Rest Haven which has shared capital gains of 50/50.

The range of additional facilities is extensive at some of the more expensive options, like Arvida Lauriston Park which has a movie theatre, library, pool table, games lounge, café, bar, piano room, care centres, treatment rooms, hobby sheds, arts and craft rooms, croquet lawns, swimming pool and spa, gym, golf putting, theatre, pétanque and bus/van trips. Others have a more limited range of activities such as bowling greens, swimming pools, libraries, hair salons, visiting healthcare services, nurse support, and bus/van trips. The range of additional facilities varies for each retirement living option.

3.5 Total Future Proof area

There are currently 37 retirement villages in the Future Proof area. In total, there are an estimated 1,400 apartments, and 3,290 villas at those villages, and 78% of them offering rest home and hospital care beds (Table 3.7). There are an additional 1,330 care beds in other rest homes with hospital care. Pensioner housing provides a small number of units (224) in the Future Proof area.

Table 3.7: Future Proof Area retirement village living summary

Retirement Living Option	Number	Land area (ha)	Average Land Area Size (ha)	Estimated total number units		
				Apartments	Villas	Care beds
Independent Living						
Hamilton City	7	27.5	3.93	111	531	-
Independent Living, Rest home and Hospital care						
Waikato District	5	65.3	13.06	51	554	332
Matamata-Piako District	4	44.9	11.22	18	172	159
Waipa District	11	79.9	7.27	356	1,236	488
Hamilton City	10	48.2	4.82	864	795	843
Future Proof	30	238.3	7.94	1,289	2,757	1,822
Rest home and Hospital care						
Waikato District	3	4.7	1.55	-	-	153
Matamata-Piako District	5	6.2	2.06	-	-	255
Waipa District	7	3.0	0.42	-	-	300
Hamilton City	9	5.6	0.63	-	-	620
Future Proof	24	19.4	0.81	-	-	1,328
Council pensioner rental housing locations						
Waikato District	3	2.5	0.82	-	34	-
Matamata-Piako District	3	2.1	0.71	-	108	-
Waipa District	3	3.0	1.00	-	82	-
Future Proof	9	7.6	0.85	-	224	-

The RVA states that the number of villages in the Waikato has increased from 27 to 37 in the eight years to 2024, and average of 1.25 villages per year.[67] Of those villages, half were between 230-400 units in size.

[67] Collyns, J., 14 October 2022. Retirement Villages Association New Zealand Submission on publicly notified proposal for policy statement of plan, change or variation – plan change 9

4 Retirement village demand

This section summarises the assessment of a range of likely scenarios for retirement village demand out to 2048, taking into account the ageing population, and assumptions about future market penetration rates.

4.1 Ageing market size

New Zealand's population is ageing as higher proportions of the population move into retirement ages. There are estimated to be 60,530 people aged over 65 years in the Future Proof Area in 2025; with 14% of those in Matamata-Piako, 21% in Waipā, 23% in Waikato and 42% in Hamilton (Table 4.1). By 2048, it is projected that 65+ population will have increased to 101,210 people, representing growth of 67% or 40,570 people, according to the medium growth projections. Under the high projections, the retirement aged population is expected to reach 113,210 people by 2048.

Table 4.1: Future Proof Area retirement aged people (65+ years) (Source: Statistics NZ)

	2023	2025	2028	2033	2038	2043	2048
Medium projections							
Waikato District	12,700	14,020	16,000	19,170	22,310	24,270	26,010
Matamata-Piako	8,060	8,570	9,330	10,330	11,070	11,320	11,460
Waipa District	11,730	12,610	13,940	15,840	17,650	18,710	19,440
Hamilton City	23,570	25,330	27,980	32,100	36,710	40,330	44,300
Future Proof	56,060	60,530	67,250	77,440	87,740	94,630	101,210
High projections							
Waikato District	12,950	14,420	16,620	20,270	23,980	26,610	29,090
Matamata-Piako	8,250	8,850	9,750	11,030	12,030	12,610	13,050
Waipa District	12,000	13,010	14,530	16,780	19,020	20,530	21,770
Hamilton City	24,100	26,110	29,130	33,970	39,480	44,140	49,300
Future Proof	57,300	62,390	70,030	82,050	94,510	103,890	113,210

Hamilton is, and will continue to be the largest population base for those aged over 65, although strong growth in those aged 65-74, and in particular 75+, is projected throughout the Future Proof area (Figure 4.1)

Figure 4.1: Population aged 65+

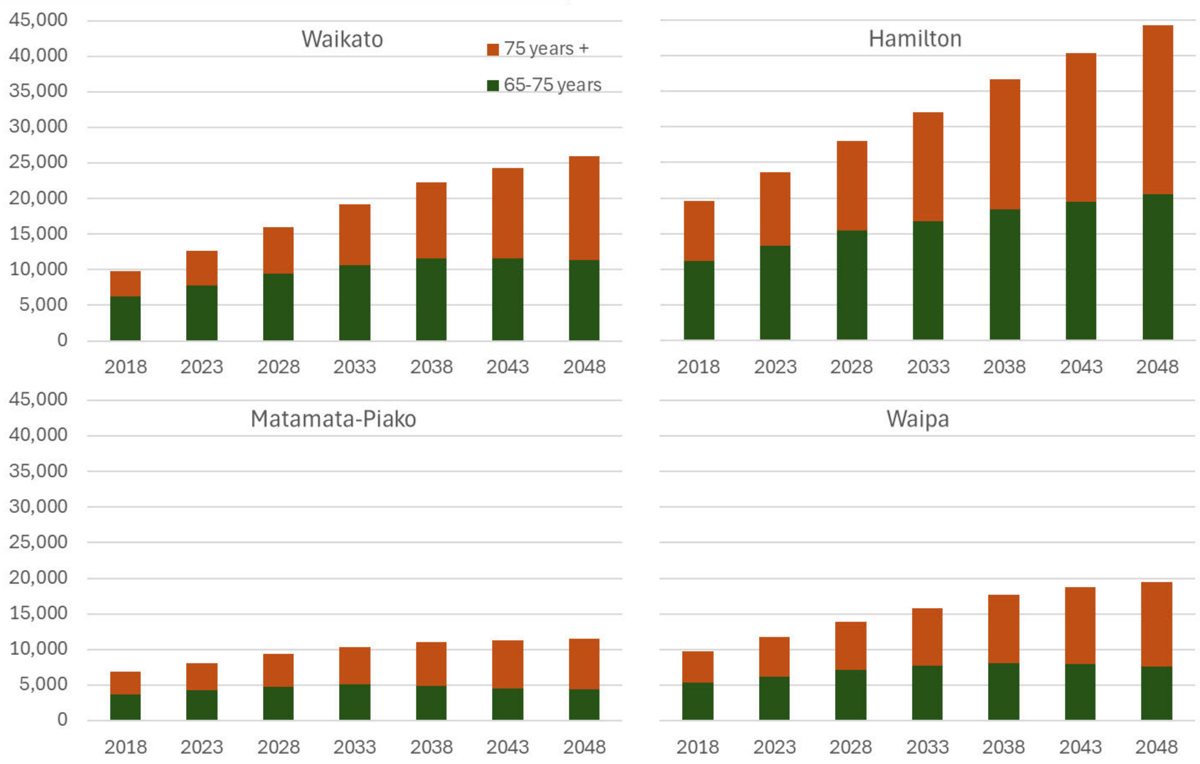
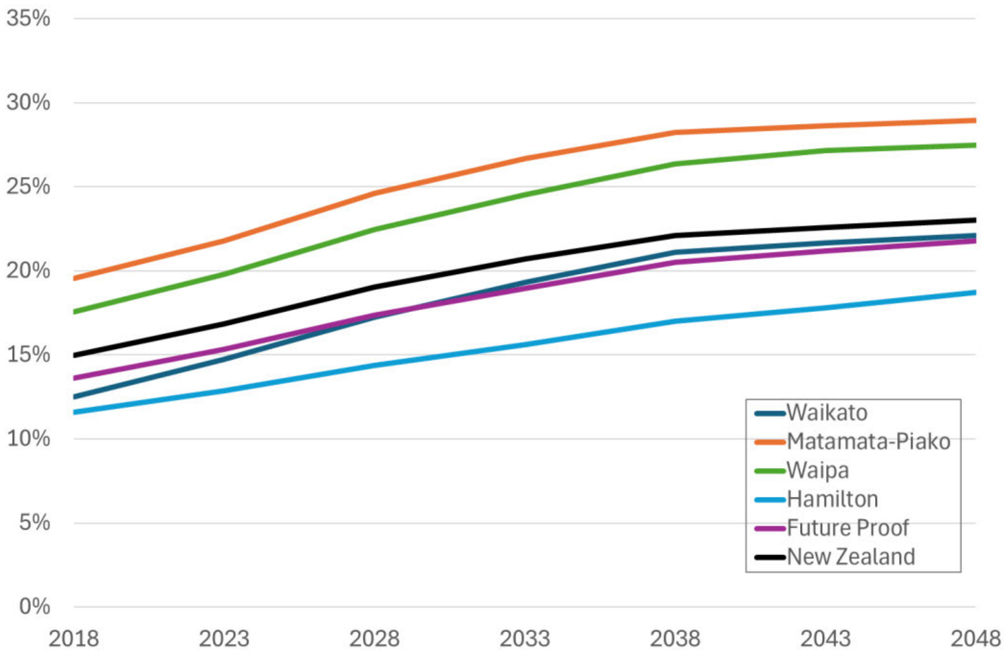


Figure 4.2 shows the shares of the retirement aged population increasing for all areas over time. By 2048, Matamata-Piako and Waipā districts are expected to have the greatest share of the population aged over 65 years, 29% and 28% respectively. The share of people in retirement ages in both of those districts is expected to continue to surpass the New Zealand average, with the share in Waikato just below the national average. The Hamilton population is relatively more youthful, with only 12% of the 2023 population aged over 65, projected to increase to 19% by 2048.

As discussed in section 2, this ageing trend is driven by the baby boomer cohort now reaching retirement age. Life expectancies are also increasing due to advancement in technologies and medical treatments, so people in that 65+ cohort will stay in it for longer. In 1950 a New Zealander aged 65 could have expected to live on average for another 14 years. Statistics New Zealand's latest life expectancy tables show that people aged 65 can expect to live on average for another 23 years.[68] One implications of this ageing population is that not only will more people move into the 65+ age range, a greater share of those will be in the 75+ age range, placing demand on aged care and retirement villages.

[68] Birman Consulting Limited, May 2023. Retirement Village Sector Housing Demand Forecasts 2023-2053: A report for the Heretaunga Plains Future Development Strategy

Figure 4.2: Share of population aged 65+



The HBCA shows that the majority of household growth will be in one person and couple households out to 2050, with those household types comprising 63% of growth in Waikato District, 59% for Hamilton City, and 71% for Waipā District. Matamata-Piako's District's assessment was done independently and only provides a breakdown of three household types, one person households are expected to make up 48% of growth.[69]

4.2 Retirement Village population demand

4.2.1 Market penetration rates

According to a consulting report undertaken for Napier and Hastings, the majority of people moving into retirement homes are over 75 years old, despite some villages having a minimum age limit of 70.[70] For NZ, the average market penetration rate for the 75+ age group was estimated to be 15% (i.e. 15% of people in this age group live in retirement homes), and the average retirement unit accommodated 1.25 people.[71]

[69] Market Economics, 13 December 2023. NPS-UD Housing Development Capacity Assessment Future Proof Partners
Matamata Piako District Council, June 2022. Housing Assessment 2022

[70] Birman Consulting Limited, May 2023. Retirement Village Sector Housing Demand Forecasts 2023-2053: A report for the Heretaunga Plains Future Development Strategy

[71] Solly, S, 31 March 2025. Harbour Navigator: Retirement village shares – Refreshed? At www.harbourasset.co.nz

The Retirement Villages Database shows that for the 2023 year the highest penetration rates were in Bay of Plenty (18.4%) and the lowest were in Southland (6.6%), while in Waikato, the rate was 13.3%, which compares with the average for the Golden Triangle of 15.7%.[72] In the previous year, Waikato's penetration rate was higher at 14.0%.

Other research conducted for the retirement village market provides indications of potential penetration rates:

- A study in Auckland assumed that market penetration for younger retirement aged people (aged 65-75 years) will be 2% in the short term and 3% in the longer term in the Auckland market.[73]
- A report prepared for Future Proof Partners refers to the "Te Ara Ahunga Ora Retirement Commission: Annual Report 2024" states that approximately 5% of people aged over 65 years and 14% of people aged over 75 years live in a retirement village, and that the average age of entry is 73 years and the average length of stay is five years.[74]
- 45% of people aged 85+ years will require care beds.[75] We have applied this assumption in the assessment below, and, as discussed in section 2, have assumed that most of those care beds will be provided in integrated retirement village models, rather than being separated due to the financial constraints identified for operating these as separate facilities. The implicit assumption here is that retirement villages will provide enough care beds to meet demand, and that may not be the case, particularly in light of concerns held by the aged care sector, as identified earlier.
- The RVA assume that market penetration rates will grow as retirement village models match the style of housing that is desired by a more discerning retirement aged cohort.[76] Whether that increasing penetration occurs remains to be seen, and the influence of aging cohorts in which home ownership rates are lower than historic levels will have some influence on this.

Based on this information, we have modelled two scenarios of market penetration to understand the total number of people likely to be wanting to live in retirement housing in the Future Proof Area (Table 4.2). The key assumptions are that:

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[72] JLL New Zealand, August, 2024. New Zealand retirement villages whitepaper. New Zealand Retirement Village Database and Aged Care Database year ending December 2023
[73] Property Economics, March 2024. Arvida Warkworth North Plan Change (Private) Economic Assessment
[74] Hackell, M., May 2025. Retirement villages and the housing needs of older Waikato residents: Current and future trends
[75] Collyns, J., 14 October 2022. Retirement Villages Association New Zealand Submission on publicly notified proposal for policy statement of plan, change or variation – plan change 9
[76] Collyns, J., 14 October 2022. Retirement Villages Association New Zealand Submission on publicly notified proposal for policy statement of plan, change or variation – plan change 9

Status Quo penetration rates

- 2% of 65-69 year olds choose to live in retirement villages.
- The weighted average for 70+year olds matches the current 13.3% Waikato Region rate and grows over time to reach 17.2% by 2048, driven by the ageing population.
- Propensity to live in retirement villages increases with age, from 4% of 70-74 year olds increasing to 50.0% of 90+ year olds.

Higher shares penetration rates

- 5% of 65-69 year olds choose to live in retirement villages from 2023-2048
- The weighted average for 70+ year olds matches the current 15.7% Golden Triangle rate and grows over time to reach 20.3% by 2048, driven by the ageing population.
- Propensity to live in retirement villages increases with age, 6% for 70-74 year olds increasing to 55% of 90+ year olds.

Table 4.2: Market penetration scenarios by age of occupants

Scenario	2023	2028	2033	2038	2043	2048
Status Quo						
65-69 years	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%
70-74 years	4.0%	4.0%	4.0%	4.0%	4.0%	4.0%
75-79 years	8.0%	8.0%	8.0%	8.0%	8.0%	8.0%
80-84 years	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%
85-89 years	43.0%	43.0%	43.0%	43.0%	43.0%	43.0%
90 years and over	50.0%	50.0%	50.0%	50.0%	50.0%	50.0%
Weighted Average 70+yrs	13.3%	13.6%	14.3%	15.1%	15.9%	17.2%
Higher Shares						
65-69 years	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%
70-74 years	6.0%	6.0%	6.0%	6.0%	6.0%	6.0%
75-79 years	10.0%	10.0%	10.0%	10.0%	10.0%	10.0%
80-84 years	13.8%	13.8%	13.8%	13.8%	13.8%	13.8%
85-89 years	46.0%	46.0%	46.0%	46.0%	46.0%	46.0%
90 years and over	55.0%	55.0%	55.0%	55.0%	55.0%	55.0%
Weighted Average 70+yrs	15.7%	16.1%	16.9%	17.9%	18.8%	20.3%

4.2.2 Population and unit demand for retirement villages

By applying the market penetration shares to SNZ's age projections, we have produced a set of retirement aged population projections, and divided those population projections by an assumed occupancy rate (1.25 people per unit, as estimated by the RVA and discussed in section 4.2.1), to estimate the required number of units (Table 4.3). The unit projections are provided for the Status Quo and Higher market penetration scenarios, and medium and high population growth scenarios, giving four scenarios of future unit demand.

In the Future Proof area the projections of retirement village dwelling units are as follows:

- Waikato District needs a total of between 840-1,090 units and care beds currently, growing by 2048 to between 2,780 and 3,310 under the medium projections, and 3,220-3,810 under the high projections.
- Matamata-Piako District currently needs between 690-850 units and care beds, growing by 2048 to between 1,430-1,660 under the medium projections, and 1,690-1,960 under the high projections.
- Waipā District currently needs between 790-980 units and care beds, growing by 2048 to between 2,090-2,470 under the medium projections, and 2,380-2,800 under the high projections.
- Hamilton City needs between 1,860-2,330 units and care beds currently, growing by 2048 to between 4,560-5,460 under the medium projections, and 5,290-6,300 under the high projections.

Table 4.3: Retirement village demand projections (number of units including care beds)

Scenario	2023	2028	2033	2038	2043	2048
Status Quo Medium						
Waikato District	840	1,130	1,510	1,930	2,350	2,780
Matamata-Piako District	690	830	980	1,140	1,290	1,430
Waipa District	790	1,010	1,260	1,560	1,830	2,090
Hamilton City	1,860	2,230	2,760	3,340	3,950	4,560
Future Proof	4,180	5,200	6,510	7,970	9,420	10,860
High Share Medium						
Waikato District	1,090	1,450	1,890	2,370	2,830	3,310
Matamata-Piako District	850	1,020	1,180	1,360	1,510	1,660
Waipa District	980	1,240	1,540	1,870	2,180	2,470
Hamilton City	2,330	2,780	3,390	4,070	4,750	5,460
Future Proof	5,250	6,490	8,000	9,670	11,270	12,900
Status Quo High						
Waikato District	860	1,200	1,630	2,120	2,660	3,220
Matamata-Piako District	720	890	1,080	1,280	1,490	1,690
Waipa District	790	1,050	1,340	1,690	2,030	2,380
Hamilton City	1,930	2,370	2,990	3,700	4,480	5,290
Future Proof	4,300	5,510	7,040	8,790	10,660	12,580
High Share High						
Waikato District	1,120	1,520	2,030	2,600	3,190	3,810
Matamata-Piako District	880	1,080	1,300	1,520	1,740	1,960
Waipa District	980	1,280	1,630	2,020	2,420	2,800
Hamilton City	2,410	2,950	3,660	4,490	5,360	6,300
Future Proof	5,390	6,830	8,620	10,630	12,710	14,870

As discussed in Section 3, there is already a supply of units and care beds available in retirement villages and care homes in each of the districts and cities (Table 4.4). Some of that supply is currently available, while some is currently planned or under construction, but it is assumed for the purposes of the following assessment that all will be available for future occupation.

Table 4.4: Retirement village supply of units and care beds

	Independent Retirement Villages	Care Beds at Rest Homes and Hospitals	Total Supply
Waikato District	937	153	1,090
Matamata-Piako District	349	255	604
Waipa District	2,080	300	2,380
Hamilton City	3,144	620	3,764
Future Proof	6,510	1,328	7,838

The next step is to assess the level of unmet demand (i.e. the additional supply that will be required in order to provide for future demand). To do this, we have subtracted current supply (Table 4.4) from the demand (Table 4.5). This assessment shows that there is sufficient supply (including supply under construction) in Waikato, Waipā, and Hamilton now, under most scenarios, with a shortage of supply in Waikato now if market share is higher than the status quo. In Matamata-Piako Districts there is currently a shortage of supply now, and that is projected to remain for the projection period.

Table 4.5: Retirement village surplus or shortfall of capacity (number of units including care beds)

Scenario	2023	2028	2033	2038	2043	2048
Status Quo Medium						
Waikato District	-220	70	450	870	1,300	1,730
Matamata-Piako District	140	280	430	590	730	880
Waipa District	-1,530	-1,310	-1,060	-760	-490	-230
Hamilton City	-1,780	-1,410	-880	-300	310	920
Future Proof	-3,390	-2,370	-1,060	400	1,850	3,300
High Share Medium						
Waikato District	30	390	830	1,310	1,770	2,250
Matamata-Piako District	300	460	630	810	960	1,110
Waipa District	-1,340	-1,080	-780	-450	-140	150
Hamilton City	-1,310	-860	-250	430	1,110	1,820
Future Proof	-2,320	-1,090	430	2,100	3,700	5,330
Status Quo High						
Waikato District	-190	140	570	1,060	1,600	2,160
Matamata-Piako District	170	330	520	730	930	1,140
Waipa District	-1,530	-1,270	-980	-630	-290	60
Hamilton City	-1,710	-1,270	-650	60	840	1,650
Future Proof	-3,260	-2,070	-540	1,220	3,080	5,010
High Share High						
Waikato District	60	460	970	1,540	2,130	2,760
Matamata-Piako District	330	530	740	970	1,190	1,410
Waipa District	-1,340	-1,040	-690	-300	100	480
Hamilton City	-1,230	-690	20	850	1,720	2,660
Future Proof	-2,180	-740	1,040	3,060	5,140	7,310

Colour legend:
Surplus supply in TA
Surplus supply in aggregate FP area

The largest surplus of supply is in Waipā District, where current (and in progress) supply is projected to be sufficient to meet demand until around 2040 under all scenarios, and even longer if growth and/or penetration is less than the high scenario. At an aggregate Future Proof level, there is sufficient supply through until around 2028 under the highest demand scenarios, and to the mid-2030s under the lowest demand scenario, although choice may be restricted to locations away from where people may currently wish to live.

By 2033, population growth means that there will be a shortfall of between 430 units and care beds (medium projection-high market penetration) and 1,040 units and care beds (high projections-high market penetration). There will be high levels of unmet demand for units and care beds in Waikato District (450-970), and in Matamata-Piako District (430-740). Unmet demand will continue to grow, with only Waipā District having sufficient supply out to 2048 under the medium projections with status quo market penetration rates, unless additional supply is provided.

4.3 Land requirements for retirement villages

The next step is to estimate the land required for future villages in order for there to be sufficient supply of retirement village units to meet demand. To do this, we have applied different densities (retirement village units per hectare) for each of the territorial authorities, based on the range of densities observed in Section 3, and allowing for increasing intensities in future retirement villages, particularly as apartments become a more accepted dwelling unit. For example, the demand for an additional 1,730 retirement units in Waikato District by 2048 (as assessed in Table 4.5), translates into 87ha of land required to accommodate those units, if the average density achieved is 20 retirement units/ha.

Table 4.6: Retirement village demand projections (ha)

Scenario	2023	2028	2033	2038	2043	2048
Status Quo Medium						
Waikato District	-11	4	23	44	65	87
Matamata-Piako District	7	14	22	30	37	44
Waipa District	-61	-52	-42	-30	-20	-9
Hamilton City	-59	-47	-29	-10	10	31
Future Proof	-125	-82	-28	33	92	152
High Share Medium						
Waikato District	2	20	42	66	89	113
Matamata-Piako District	15	23	32	41	48	56
Waipa District	-54	-43	-31	-18	-6	6
Hamilton City	-44	-29	-8	14	37	61
Future Proof	-81	-29	33	102	168	235
Status Quo High						
Waikato District	-10	7	29	53	80	108
Matamata-Piako District	9	17	26	37	47	57
Waipa District	-61	-51	-39	-25	-12	2
Hamilton City	-57	-42	-22	2	28	55
Future Proof	-119	-70	-6	66	143	222
High Share High						
Waikato District	3	23	49	77	107	138
Matamata-Piako District	17	27	37	49	60	71
Waipa District	-54	-42	-28	-12	4	19
Hamilton City	-41	-23	1	28	57	89
Future Proof	-75	-15	59	142	227	316

Colour legend: Surplus supply in TA
Surplus supply in aggregate FP area

Table 4.6 shows the land requirements for retirement villages to 2048, and Table 4.7 translates that area into a number of new retirement villages required using the average land area for all Future Proof retirement villages (7.9ha). That is, the demand for an additional 87ha of retirement village land area in Waikato District by 2048 (as assessed in Table 4.6), translates into 11 villages if the average village is 7.9ha. If the average density and/or average land area of new villages differs from that assumed, that will affect the number of villages assessed in Table 4.7.

Based on those projections and assumed densities, current supply will be able to be met across the entire Future Proof area until between 2028 and 2033, although as modelled earlier in relation to the number of units, there is currently unmet demand in Waikato District and Matamata-Piako, balanced out by a surplus in Waipā and Hamilton. The current unmet demand in Waikato and Matamata-Piako is projected to increase by 2033 to between 23-49ha (3-6 retirement villages) in Waikato District, and 22-37ha (3-5 villages) in Matamata-Piako District.

Table 4.7: Retirement village demand projections (approximate number of villages)

Scenario	2023	2028	2033	2038	2043	2048
Status Quo Medium						
District	-1	0	3	6	8	11
Matamata-Piako District	1	2	3	4	5	6
Waipa District	-8	-7	-6	-4	-3	1
Hamilton City	-8	-6	-4	-1	1	4
Future Proof	-16	-11	-4	4	12	20
High Share Medium						
Waikato District	0	3	5	9	12	15
Matamata-Piako District	2	3	4	5	6	7
Waipa District	-7	-6	-4	-2	-1	1
Hamilton City	-6	-4	-1	2	5	8
Future Proof	-11	-4	4	13	22	31
Status Quo High						
Waikato District	-1	1	4	7	10	14
Matamata-Piako District	1	2	3	5	6	7
Waipa District	-8	-7	-5	-3	-2	0
Hamilton City	-7	-6	-3	0	4	7
Future Proof	-16	-9	-1	9	19	29
High Share High						
Waikato District	0	3	6	10	14	18
Matamata-Piako District	2	3	5	6	8	9
Waipa District	-7	-5	-4	-2	1	2
Hamilton City	-5	-3	0	4	7	12
Future Proof	-10	-2	8	18	30	41

Colour legend: Surplus supply in TA; Surplus supply in aggregate FP area

By 2038, there will be demand for 33-142ha (4-18 villages) in the Future Proof area. This demand will continue to grow to total demand of between 152-316ha (20-41 villages by 2048). This demand is equivalent to 0.8-1.6 new villages within the Future Proof area per annum over the next 25 years (Table 4.8).

Table 4.8: Average annual demand for new retirement villages over next 25 years (number of villages)

	Status Quo Medium	High Share Medium	Status Quo High	High Share High
Waikato District	0.5	0.7	0.6	0.8
Matamata-Piako District	0.2	0.3	0.3	0.4
Waipa District	-0.0	0.0	0.0	0.1
Hamilton City	0.1	0.2	0.2	0.4
Future Proof	0.8	1.2	1.2	1.6

The middle of that range (1.2 villages/year) is comparable to recent historic shares based on the Future Proof area's current and projected share of the national 65+ population (around 7%), given national growth of 137 villages in the last ten years.[77] That projection is higher than implied in the recent Grant Thornton research which projects average annual growth of 932 units per year nationally, equivalent to around 5-6 villages averaging 150-200 units each nationally. If the Future Proof area were to experience a share of that national demand pro rata to its share of the 65+ population, that would equate to only around one village every two years, providing some indication that relative to national trends, the projections in Table 4.8 are unlikely to be understated.

4.4 Demand by price point

This demand will need to cater for a wide range of typologies and price points and it is likely that there will continue to be demand for housing in the more affordable range, perhaps in more rural areas such as in Waikato and Matamata-Piako Districts.

However, it is difficult to provide a disaggregated assessment of demand for retirement village dwelling units by price point due to the limited availability of reliable, publicly accessible data. Unlike conventional housing markets, retirement village units are typically sold under occupational rights agreements, which are not recorded in official sales data such as LINZ or CoreLogic property transactions, and operators are not required to publish price points or sales volumes by unit type, location, or buyer profile. Additionally, retirement village demand is influenced by factors beyond price, including care availability, amenities, and proximity to support networks, which further complicates meaningful price segmentation.

While there is some disaggregation of residential demand in the Future Proof Housing Development Capacity Assessment (**HDCA**), such as by household type and household income, neither of those two variables provide a robust basis for making any accurate inferences about residential demand by age cohorts, or for retirement village demand in particular. While the HDCA confirms trends that are likely to be primarily influenced by the ageing population, for example the share of single person households is projected to increase from 22% to 25% over the next 50 years, and couple households from 26% to 28%,[78] that trend will not solely relate to an ageing population.

Similarly, no inferences can be drawn from data in the HDCA on household income. While there is relatively robust data on household income through Census and other sources such as the Household Economic Survey, there is far limited data on household wealth, particularly at the subnational level, or for the older population specifically. Wealth is a more relevant indicator than income for assessing

[77] JLL New Zealand, August, 2024. New Zealand retirement villages whitepaper. New Zealand Retirement Village Database and Aged Care Database year ending December 2023, page 4, equivalent to 13.7 villages per year, 7% of which is 0.96 villages per year
[78] M.E Consulting, Future Proof Housing Development Capacity Assessment, 13 December 2023

the ability of retirees to purchase or enter retirement village units, yet current datasets do not provide granular insights into asset holdings, liquid savings, or home equity among older households. This lack of visibility makes it difficult to estimate affordability thresholds or match potential residents to village price points with any precision.

Nevertheless, the limited assessment that is possible from the retirement village price point information provided in section 3 shows some grouping of price points near the middle of the range, and then few outliers at the upper and lower ends. There are relatively few retirement village options near the upper end of the price continuum, and, as discussed above, more affordable options such as council-provided pensioner housing are become less common, and overall retirement village supply offers little at the more affordable end of the spectrum. If more affordable options existed, it is quit possible that the market penetration rates assumed for this study could be too low, meaning there is a section of the population that might currently chose to live in retirement villages if they could afford to do so, but they cannot afford to do so. That is, current price points quite possibly mask true demand, meaning that the penetration rates assumed in this study, and the demand calculated in reliance on those assumed rates, is on the low side.

From a supply perspective, opportunities exist for some variance in price point to be achieved in the future through provision of lower price point options such as small apartments, and for higher end units with larger floorplates, higher quality finishings and access to a wide range of facilities at villages. From a demand perspective, although there is no reliable data available, it is likely that there will be a range of price points required by the market, as ageing affects all members of the population and will require alternative accommodation to be found by many, regardless of socio-economic background or wealth. That alternative accommodation will need to include options that do not require large capital outlay, and which can provide security of tenure in rental arrangements, whether those options are in the general property or specific retirement housing market.

5 Summary

This report has described some of the challenges and opportunities currently arising in the retirement village sector and estimated the level of demand for retirement village units and care beds out to 2048. We have assessed and described the current level of supply, including those currently under construction, for each of the territorial authorities in the Future Proof area, as the basis for understanding both the spatial location of demand and any shortfalls or surpluses of supply.

The report provides information to help Future Proof Partners address the ongoing pressure for out of sequence development proposals for retirement villages on the periphery of urban/village areas and in un-serviced rural environments. The RVA has estimated that it takes an average of ten years to plan for, and construct, retirement villages, so it is important to identify the broad spatial areas where there will need to be more future provision.

The largest current (including imminent planned) level of supply of retirement village capacity in the Future Proof area is in Hamilton City, with 3,760 units and care beds, followed by Waipa District with 2,460 units and care beds. Waikato District and Matamata-Piako District have much smaller capacity, with 1,120 and 610 units and care beds respectively. Currently supply meets demand in the wider Future Proof area, and is projected to continue to do so until at least 2028, however supply does not match up with demand spatially, and there are currently shortfalls in Waikato District and Matamata-Piako District.

The slight mismatch between the location of supply and demand will have implications for the ability of older people to age in place, with concentration of retirement village supply in urban areas, particularly in Hamilton and Waipā, meaning that some older people will need to move away from their long-term homes to be able to access retirement dwelling supply. That is not optimal from a social perspective, and the true effects of that are also masked tom some extent by affordability issues. While affordability is difficult to understand accurately from the data available, it does affect many older people, and will limit choice in the sector. That is particularly true of the upper end of the villages market, where, for example, the Tamahere Country Club provides a large proportion (around one-third) of retirement village supply in Waikato District, but is located in the far southern part of the District, and is pitched at higher levels of affordability, likely leaving gaps geographically (in the northern parts of the District) and by price point (for more affordable retirement options).

Waikato District is projected to experience significant proportional growth in the 65+ population from 2023 to 2048 (+105%, 13,310 people), followed by Hamilton City (+88%, 20,730 people). Lower growth rates are projected in Waipa District (+66%, 7,710 people) and Matamata-Piako District (+42%, 3400 people). With market penetration rates among the over 65s forecast to grow from between 13.3%-15.7% to 17.2%-20.3% as the population ages, demand for the number of retirement units and care beds will increase by between 6,680 and 9,480 between 2023 and 2048 in the Future Proof area. Approximately 41% of the demand growth will be in Hamilton City, followed by Waikato District (29%), Waipa District (19%) and Matamata-Piako District (11%).

By 2033, there will be demand for up to 59ha of additional land for retirement housing under the high penetration, high growth scenario, equivalent to eight new villages across the Future Proof area. Under lower growth scenarios current supply will remain adequate to service demand to 2033 at a Future Proof level, although supply will continue to be concentrated in Hamilton and Waipā, with the current undersupply in Matamata Piako and to a lesser extent Waikato district persisting unless large new villages are developed there.

By 2048, the Future Proof area will require approximately between 152ha and 316ha of land for new retirement villages if current operating models persist, although there is potential for increased densification and greater use of apartment typologies, which would increase the ability for new villages to establish in more central urban locations. Irrespective of future typologies, market growth by 2048 will equate to 20-41 new retirement villages compared to current supply, or 0.8-1.6 new retirement villages per annum.

Consistent with national research on the issue, retirement village growth in the Future Proof area is projected to be strong, and will present challenges to both operators and the councils as to how to accommodate demand in a way that is consistent with sub-regional planning expectations around urban form, meets resident expectations for accessibility and proximity to their preferred place of residence, and can be undertaken in a way that is financially sustainable from the perspective of operators.

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

Project name	Harlow Lifestyle Village

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

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Waikato Regional Council		
***First name**	Michelle		
***Last name**	White		
Postal address			
***Contact phone number**	s 9(2)(a)	**Alternative**	
***Email**	s 9(2)(a)		

2. Please provide your comments on this application

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

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

The following responds first to the matters under section 17(3) of the Act that a local authority must provide comment on, and then second on some of matters the Minister will consider in section 22 of the Act.

SECTION 17(3)

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

WRC is not aware of any competing applications.

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

WRC can confirm that as at the date of this response there are no such applications.

SECTION 22

WRC provides the following comments which are aimed at informing on certain matters relevant to the Ministers considerations under section 22.

Is this project of regional significance?

WRC does not consider this application to be regionally significant based on the criteria listed in s22(2)(a) of the Act:

- The proposal has not been identified as a priority project in any central or local government strategy.
- It will not deliver new regionally or nationally significant infrastructure.
- It will not address housing needs or contribute to a well-functioning urban environment.
- It will not deliver significant economic benefits.
- It will not support primary industries, the development of natural resources or climate change mitigation and adaptation.
- It will not address any significant environmental issues.
- It is inconsistent with the Waikato Regional Policy Statement (WRPS), Future Proof Strategy and Waipā 2050 Growth Strategy.

Although the proposal will increase the supply of housing in Waipā, the latest Housing Capacity Assessment that supports the Future Proof Strategy, indicates a projected surplus in capacity in Te Awamutu/Kihikihi in the medium to long-term (2026 to 2052). Housing capacity substantially increases in the medium-term with the application of the PC26[1] intensification provisions, and in the long-term with greenfield areas being live-zoned and an increased range of intensification opportunities. There is a small insufficiency in years 1 to 3 (2022 to 2025) due to market conditions and infrastructure constraints, but overall there is a projected surplus in capacity. The Housing Capacity Assessment does show a shortfall of housing in the affordable housing bracket in Te Awamutu/Kihikihi, however, it is unclear whether this 'bespoke' retirement village can deliver housing in the lower price bracket.

Given this context and the inconsistencies with local and regional planning documents as discussed below, this application would be best addressed through a plan change to the Waipā District Plan. This would have the additional benefit of allowing the local community to have a say on the project.

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

<u>Waikato Regional Policy Statement:</u>

The proposal is inconsistent with the WRPS. The proposed area has not been identified for growth in the Future Proof settlement pattern, which is embedded in the WRPS and the decisions version

[1] This is Waipā District's intensification plan change as required by the National Policy Statement on Urban Development. It became operative in August 2024.

of Proposed WRPS Change 1 - National Policy Statement on Urban Development 2020 and Future Proof Strategy Update [2023][2]. The relevant policy is:

- *UFD-P11 – Adopting Future Proof land use pattern*
  Within the Future Proof area: new urban development shall occur within the Urban and Village Enablement Areas indicated on Map 43 (5.2.10 Future Proof map (indicative only));…

Additionally, WRC considers that the proposal does not meet the 'out-of-sequence and unanticipated developments' criteria (APP13) in the decisions version of Proposed WRPS Change because:

- There is not a demonstrated need or shortfall for housing.
- The proposal will not contribute to a well-functioning urban environment.
- It is inconsistent with the Future Proof Strategy guiding principles and growth management directives.
- It does not have good accessibility for all people, including by way of public or active transport.
- It is not compatible with adjacent land uses (e.g. surrounding productive rural land and orchard).

Land and freshwater

The site includes areas of highly productive land and supports nine natural inland wetlands. The relevant policies are:

- *LF-P11 – High class soils*
  Avoid a decline in the availability of high class soils for primary production due to inappropriate subdivision, use or development.
- *IM-P4 – Regionally significant industry and primary production*
  The management of natural and physical resources provides for the continued operation and development of regionally significant industry and primary production activities by:
  ...
  6. avoiding or minimising the potential for reverse sensitivity;…
- *LF-P2 – Outstanding freshwater bodies and significant values of wetlands*
  Ensure that the outstanding values of a fresh waterbody that result in that waterbody being identified as an outstanding fresh waterbody, and the significant values of wetlands, are protected and where appropriate enhanced.

Te Ture Whaimana o te Awa o Waikato

Te Ture Whaimana o te Awa o Waikato (the Vision and Strategy for the Waikato River) is incorporated into the WRPS. There is no assessment if this critical aspect within the documents viewed by WRC and any application should address how it will give effect to Te Ture Whaimana.

[2] This change to the WRPS is not yet operative as it is subject to three limited appeals but they do not affect this specific provision. One appeal related to the Future Proof settlement pattern, which has been resolved, and it did not relate to this area.

Future Proof Strategy

The Future Proof Strategy[3] is a 30 year growth management and implementation plan for the Hamilton, Matamata-Piako, Waipā and Waikato sub-region. The strategy aims to manage growth in a staged and coordinated manner. It is the Future Development Strategy for the sub-region (as per the requirements of the National Policy Statement on Urban Development).

The Strategy was updated in 2024 and identifies sufficient residential capacity for the sub-region for 30+ years. It has a compact and concentrated approach to growth with future development focused in and around key growth areas which are identified on the settlement pattern map. The proposed area has not been identified for growth in the Future Proof settlement pattern.

The Future Proof partners have recently undertaken a Retirement Living Market Analysis[4] due to ongoing pressure of unanticipated land development proposals for retirement villages on the periphery of urban/village areas and in un-serviced rural environments. The analysis shows that there are currently 21 retirement living options in Waipā District, including 11 independent living villages with rest homes and hospitals, seven rest home and hospital care options, and three broad locations for pensioner housing available to rent from Waipa Council. The analysis concluded that the largest surplus of retirement living supply across the Future Proof sub-region is in Waipā District. Current (and in progress) supply is projected to be sufficient to meet demand until around 2040 under all scenarios, and even longer if growth and/or penetration is less than the high scenario.

Waipā Growth Strategy

Waipā District Council, with the support of the Future Proof partners, has been proactive in planning for future growth in Te Awamutu, evidenced through Waipā 2050 and the Future Proof Strategy. These documents have informed the current operative district plan and the community's vision for the growth of Te Awamutu.

Waipā 2050 sets the development pattern for the district, including identifying specific growth areas and timings. The strategy identifies ten growth cells in Te Awamutu to provide for growth until 2035, with a further four growth cells to provide for growth beyond 2035. The strategy notes that these growth cells will be sufficient to provide for growth until 2035 and beyond. The proposed area is not identified as a growth area.

Waikato Regional Plan

The applicant proposes to connect to Waipā District Council's reticulated water supply network for potable supply following upgrades to the existing Greenhill Booster Pump (referral application and Appendix J). Should this be acceptable to the district council, no groundwater or surface water take consents would be required for potable supply.

There is reference in the referral application that resource consent will be sought for either a surface water or groundwater take for the purpose of dust suppression during construction

[3] Our strategic direction | Future Proof

[4] RetirementLivingMarketAnalysis.pdf

earthworks. No details are provided about the proposed take locations or volumes required. There are no existing bores on site that are registered with WRC. The applicant has indicated that a surface water take would be a controlled activity under Rule 3.3.4.16 of the Waikato Regional Plan (WRP). In this catchment, best case scenario would be restricted discretionary however, this would need to be confirmed once the proposed surface water take location is confirmed. A groundwater take consent is likely to be a discretionary activity under Rule 3.3.4.24, as correctly identified by the applicant.

If the applicant proposes to drill a new well to supply water for dust suppression purposes, a well drilling consent under Controlled Activity Rule 3.8.4.7 of the WRP is required. This rule has not been identified in the application documentation. If dewatering is required, then resource consent would also be required – potentially a groundwater diversion (Rule 3.6.4.13 – discretionary) and surface water take (Rule 3.3.4.26 – non-complying activity) if dewatering occurs via open channels/sumps.

Stormwater and earthworks consents will be required. The stormwater design outlined in the referral application is consistent with the WRC Stormwater Management Guidelines, with a low impact design and treatment train approach to manage stormwater.

<u>Waipā District Plan</u>

The proposal will trigger resource consents under the Waipā District Plan. The proposed staged subdivision is classified as a non-complying activity because it fails to comply with the performance standards for subdivision in the Rural Zone. The proposed land use activities (retirement village, standalone houses, duplexes and apartments) are also classified as non-complying activities because they are not explicitly provided for within the Rural Zone.

Transport considerations

We note that a preliminary transport assessment has not been provided with the referral application. We can, however, provide high level comments based on the master plans provided in Appendix B.

While the location for the proposed development is on the urban fringe of Te Awamutu, we note there is only one road into the development, and there are no proposed future connections to the existing or future urban areas. This means that the only way to exit the development area is via State Highway 3, a busy main road. Most residents would be turning right to travel to Te Awamutu. This is considered a safety issue that would need to be addressed.

We note that New Zealand Transport Agency will need to give its approval for the access to State Highway 3.

Without a transport assessment it is difficult to know if there is to be provision for alternative modes such as walking and cycling. While this is primarily a village for older residents, we note that it is called a 'lifestyle village' catering for those aged 55 years and older. Many people within this age group still enjoy an active lifestyle. We therefore suggest consideration be given to walking and cycle paths that link to existing infrastructure in the area, avoiding using the State Highway, given the safety concerns raised above.

In relation to public transport, there is a bus stop close by on the Te Awamutu to Hamilton route. However, there isn't a corresponding one on the opposite site of the road for disembarking from a

Hamilton to Te Awamutu journey. We strongly suggest working with WRC (as the Public Transport Authority) and New Zealand Transport Agency (as the Road Controlling Authority) to give further consideration to this.

Ecological considerations

Bats

Bat activity was detected at the site, and as such a Bat Management Plan should be expected as part of the Environmental Management Plan.

Herpetofauna (lizards)

A detailed survey was not undertaken, however, with the presence of suitable habitat, a Lizard Management Plan should be expected as part of the Environmental Management Plan.

Avifauna (birds)

A detailed avifauna survey should be expected to determine if any indigenous taxa utilise the area.

Pre and post-development surveys

Detailed surveys of bats, lizards and birds should be undertaken prior to any development activity to understand the existing ecological conditions. These surveys should be followed by post-development monitoring to assess any changes and to demonstrate no net loss of biodiversity.

Natural hazard considerations

A detailed flood assessment will need to be undertaken as part of a substantive application to ensure the development does not have offsite impacts and that the flooding onsite is not hazardous.

Acid sulfate soils

The site has a high probability of Acid Sulfate Soils[5] (ASS) being present in low lying areas. ASS are naturally occurring soils and sediments that contain iron sulfides (like pyrite) which, when exposed to oxygen (through drainage or excavation), can oxidize and produce sulfuric acid. This oxidation process can lead to acidification of soil and water, potentially harming ecosystems and infrastructure. The potential for the occurrence of ASS at the site should be considered in relation to the proposed development.

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

[5] Managing acid sulfate soils | Waikato Regional Council

Managers signoff

AnaMaria d’Aubert

Date: 26 August 2025

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

Project name	Harlow Lifestyle Village Project

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

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

1. Contact Details

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

Organisation name (if relevant)	NZ Transport Agency		
***First name**	Nicola		
***Last name**	Foran		
Postal address			
***Contact phone number**	s 9(2)(a)	**Alternative**	
***Email**	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application

NZTA thanks the Minister for the opportunity to comment on the referral of this application into the fast track approvals process.

NZTA has not had pre-application engagement nor prior experience with this applicant regarding the Harlow Lifestyle Village Project (the project); however, NZTA had prior engagement with Ultimate Holdings Limited for a proposal of similar scale and effects as to what is now being proposed.

NZTA provides the following commentary:

NZTA would need to see the substantive application to be able to determine actual impacts on the state highway network, however developments of this nature usually impact the network through increased heavy vehicle movements during site development and construction, and a sustained increase in traffic volumes at the completion of the development.

NZTA notes that State Highway 3 is a regionally significant route, and its function is not intended to provide for residential subdivisions. State Highway 3 in this location currently functions as a semi-rural state highway and does not include typical infrastructure that is needed to provide for residential developments of this nature. Significant investment in the state highway infrastructure to change the nature of how State Highway 3 functions in line with a typical urban highway would be required. However, NZTA does not consider that this location is appropriate for a direct connection and considers that the development would adversely impact on the efficiency and effectiveness of State Highway 3. As such, at this point in time NZTA would not support nor approve a new connection to State Highway 3.

Given the residential nature of the project and proximity to the local road network, this project would be more suitable to integrate into, and be serviced by, the local road network to the South of the project via Innes Place and/or Greenhill Drive. NZTA notes that property agreement and/or land purchase would be required to provide for this arrangement.

As part of the substantive application NZTA would expect to see a comprehensive Integrated Transport Assessment prepared, along with a construction management plan, and mitigation measures to address any adverse effects on the state highway resulting from this development. The developer will need to work with NZTA regarding effects of the project on State Highway 3, and the developer will need to wholly fund any works required to provide for the project.

Although NZTA has identified concerns with the Harlow Lifestyle Village project, NZTA does not oppose the project being referred into the fast track approvals process.

NZTA would like to be invited to provide comment on any substantive application in due course.

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

Managers signoff

nicolaforan

Nicola Foran

Date: 28 August 2025