

To: Ashbourne Expert Consenting Panel – Environmental Protection Agency c/ Nicky Sedgeley
From: Fraser McNutt – Barker & Associates Limited
Date: 18 November 2025
Re: Ashbourne [FTAA-2507-1087] – Applicant’s Response to Planning Comments Received

This memorandum accompanies and should be read in conjunction with the *Planning Response to Councils and Stakeholders and NPS-HPL Response* in relation to comments received under Section 53 of the Fast-Track Approvals Act 2020 (FTAA) on the Ashbourne proposal. It outlines the approach I have taken in preparing and contributing to the relevant responses, summarises key considerations, and reaffirms the planning position that the Ashbourne proposal meets the requirements of the FTAA and is capable of being approved by the Panel.

Preparation of Planning Responses and Review of all Comments

I have prepared detailed planning responses to the matters raised, supported by a comprehensive suite of further technical information from the project’s technical specialists. In doing so, I have read and considered all comments and submissions received from Ministers and statutory stakeholders, Matamata-Piako District Council, Waikato Regional Council, iwi and hapū entities, directly affected neighbours, and other interested parties. The issues raised in those comments have been systematically addressed within the accompanying response package.

As a high level summary, I set out some summaries below that reflect my refined and revisited thinking on key matters to assist the panel.

Regional Significance and Benefits of the Ashbourne Proposal

In my planning response, I have cited the regional significance and substantial public benefits generated by the Ashbourne proposal, supported by the Economic Memorandum prepared by Insight Economics. For emphasis, these key benefits are reiterated below:

- **A major multi-year construction stimulus** of more than \$500 million, delivering sustained employment, procurement opportunities for local suppliers, and increased consumer spending. This scale of development would not otherwise occur in Matamata in the foreseeable future.
- **Accelerated delivery of much-needed housing**, reducing pressure on supply, mitigating potential price escalation, and supporting employers by enabling earlier access to a local workforce. The timing of delivery generates significant “time value” economic and social benefits.
- **Diversification of housing types**, introducing a range of typologies (including standalone homes, townhouses, apartments, and retirement units) that respond to unmet demand and improve housing choice and efficiency in the regional market.
- **Expansion of the labour pool and economic base**, with population growth contributing to the vitality of Matamata and the wider Waikato and Bay of Plenty sub-regions, supporting local business resilience and service provision.

- **Renewable energy generation**, with the integrated solar energy precinct providing clean electricity to the national grid—an environmental and regional benefit that would not occur under the status quo of rural pastoral use.
- **Greater competition and choice in the development market**, consistent with the aims of the National Policy Statement on Urban Development (NPS-UD), resulting in improved market responsiveness, innovation, and potentially more competitive housing outcomes across the region.

These benefits are significant in scale and breadth, align directly with the purpose of the FTAA, and outweigh the localised potential adverse effects of the proposal, which are capable of being appropriately managed through the proposed conditions of consent.

Application of Clause 17 (Schedule 5) – Criteria and Other Matters

I also draw the Panel's attention to the legal memorandum prepared by Phil Lang, which outlines the helpful and correct interpretation and weighting of the Clause 17 criteria. Consistent with that advice, I reiterate that Clause 17(1) explicitly requires that, when considering the consent application, the Panel must give the *greatest* weight to the purpose of the FTAA.

Clause 17(1) specifically states that the Panel must take into account, giving the greatest weight to paragraph (a):

- (a) *the purpose of this Act;*
- (b) *the provisions of Parts 2, 3, 6, and 8–10 of the Resource Management Act 1991 that direct decision-making on resource consent applications; and*
- (c) *the relevant provisions of any other legislation that directs decision-making under the Resource Management Act.*

The primacy of the FTAA's purpose enabling accelerated delivery of significant projects that have substantial regional or national benefits has been front of mind in preparing the planning responses, addressing matters raised in comments, and evaluating effects against the statutory framework.

Equally, those regional benefits, in my view outweigh any potential adverse impacts of the proposal.

Clause 85(3) - Approval may be declined if adverse impacts out of proportion to regional or national benefits

(3) A panel may decline an approval if, in complying with section 81(2), the panel forms the view that—

- (a) *there are 1 or more adverse impacts in relation to the approval sought; and*
- (b) *those adverse impacts are sufficiently significant to be out of proportion to the project's regional or national benefits that the panel has considered under section 81(4), even after taking into account—*
 - (i) *any conditions that the panel may set in relation to those adverse impacts; and*
 - (ii) *any conditions or modifications that the applicant may agree to or propose to avoid, remedy, mitigate, offset, or compensate for those adverse impacts.*

(4) To avoid doubt, a panel may not form the view that an adverse impact meets the threshold in subsection (3)(b) solely on the basis that the adverse impact is inconsistent with or contrary to a provision of a specified Act or any other document that a panel must take into account or otherwise consider in complying with section 81(2).

(5) In subsections (3) and (4), **adverse impact** means any matter considered by the panel in complying with section 81(2) that weighs against granting the approval.

National Policy Statement for Highly Productive Land

I draw the Panel's attention to the *NPS-HPL Response* addressing the comments received from Matamata-Piako District Council in relation to the National Policy Statement for Highly Productive Land (NPS-HPL). The supporting technical inputs provided by Reece Hill (Landsystems) and Jeremy Hunt (AgFirst) offer important, independent support that further substantiates our analysis and position regarding the application of the NPS-HPL, particularly as it relates to the Clause 3.10 exemption pathway.

Clarification of Reasons for Consent and Updated Conditions

In response to the feedback received, I have clarified the reasons for consent associated with the proposal and refined the proposed conditions of consent as best I can at this time. These revisions ensure alignment with the FTAA framework, respond directly to stakeholder concerns, and provide the Panel with a clear and enforceable conditions suite capable of appropriately managing the effects of the development.

Engagement with Iwi and Hapū

In preparing my planning response, I have undertaken additional correspondence with iwi and hapū to seek further feedback, confirm particular responses, and ensure their perspectives were appropriately reflected. Their input has directly informed some of the planning responses.

Conclusion

In summary, the planning response and the full suite of supporting technical memorandums and responses, clearly demonstrate that the Ashbourne project delivers substantial regional benefits, appropriately manages its effects, and meets the requirements of the FTAA. On this basis, I continue to hold the position that the Panel can approve the application.



Fraser McNutt

Partner



To: Ashbourne Expert Consenting Panel – Environmental Protection Agency c/ Nicky Sedgeley

From: Fraser McNutt / Steph Wilson – Barker & Associates Limited

Date: 18 November 2025

Re: Ashbourne [FTAA-2507-1087] – Applicant’s Response to Planning Comments Received

This memorandum has been prepared to address comments and concerns pertaining to planning matters raised by the persons or groups set out in Section 53(2) of the Fast-track Approvals Act 2024 (“FTAA”) within their comments on the application by Matamata Development Limited (“the Applicant”) for the Ashbourne development (“the Project”).

This memorandum contains the following key sections:

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1.1	Memorandum 1 - Implications of Ashbourne Development on Matamata’s Strategic Growth Planning	1
1.2	Memorandum 2 - Review of the Applicant’s Assessment of the Application under Part 2 RMA and relevant planning documents	10
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3.0	Updates to Reasons for Consent/Assessment	Error! Bookmark not defined.

1.0 Matamata Piako District Council

Within its comments, Matamata Piako District Council (“MPDC”) prepared three memoranda identifying areas of contention or disagreement between the Applicant and MPDC that it considers should be addressed prior to determination of the application. The below sections address each of these memoranda.

1.1 Memorandum 1 - Implications of Ashbourne Development on Matamata’s Strategic Growth Planning

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2	The submitter summarises the key drivers for the Residential Growth Strategy as implemented through Council-initiated Plan Change 47 (“PC 47”), and the Future Development Strategy (“FDS”) that is currently in place. While it is noted that at the time of inclusion in Future Proof’s Strategy for the sub-region, MPDC had not yet updated its Housing Capacity	I note the MPDC response and sight the reply from Insight Economics dated 18 th November 2025 to Mr Heaths evidence in particular. I remain supportive and reliant on the advice and findings of Mr Fraser Colegrave in his initial reporting, subsequent memo and recent reply to comments. In particular, the review of the of

Summary of MPDC Assessment	Applicants Response
<p>Assessment 2022 (HCA). This work has been subsequently undertaken, and the results are reported in the evidence provided by Tim Heath of Property Economics. The submitter concludes that Matamata's future growth strategy has thus been verified, and is still "good policy", with no reason to depart from it.</p>	<p>the revised dwelling capacity assessment contained in appendix 9 of his response.</p> <p>I note the following conclusion of that review:</p> <p><i>"Our review found the capacity assessment to be basic, lacking any nuance, numerically inconsistent, and thus of no practical value. Overall, we reject the peer review's conclusion that the Ashbourne proposal is not required to provide sufficient development capacity."</i></p> <p>I note that the FDS sets direction for the region's future growth and the relevant growth strategy for MPDC would give effect to this. While these documents are important to consider and direct growth, they do not hold the same amount of weighting as it would under an RMA consenting or plan change process when making a decision under the FTAA. Within the FTAA it sits within schedule 5 17(1)(c) as a lower weighted document for assessment. I sight the higher order consideration that the FTAA sets as the greatest weighted consideration being the Act's purpose - <u>to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.</u></p> <p><i>"Given all the above, Ashbourne emerges as a strongly positive proposition when evaluated against the FTAA's criteria. The Act's purpose is to "facilitate the delivery of ... development projects with significant regional or national benefits." This project exemplifies that mandate, with clear and significant regional benefits demonstrated. Under Schedule 5 Clause 17 of the FTAA, the Panel must give greatest weight to the Act's purpose in its decision. Practically, this means that if a project delivers on substantial regional benefits (as Ashbourne does), that consideration should guide the outcome, provided adverse effects are not disproportionate. We have shown that the adverse effects are manageable and not out of proportion to the benefits.</i></p> <p><i>Importantly, the FTAA is specifically designed for situations where accelerated delivery of public</i></p>

Summary of MPDC Assessment		Applicants Response
		<i>benefits – such as housing and infrastructure – is warranted. Central government’s policy intent, through instruments like the NPS-UD and the Medium Density Residential Standards, is clearly to enable more housing supply and accelerate development in appropriate locations. Ashbourne aligns with these directives by unlocking a large supply of housing in a growth corridor, contributing to the Government’s broader housing affordability and urban growth objectives.”</i>
3	Ashbourne’s Conflict with Matamata’s growth strategy	
3.1	<p>Conflict with the growth strategy.</p> <p>The following components of the Project depart from the strategy:</p> <ul style="list-style-type: none"> • Develops circa 66ha of land (roughly equal to the land area provided for in the “Future Residential Policy Area” at the eastern periphery of town for urban purposes on land zoned Rural-Residential and Rural • Introduces more than 500 dwellings, more than 200 retirement units, and a neighbourhood centre into an area with an emerging and planned lifestyle character • Withdraws circa 40ha of land zoned Rural-Residential (approximately half of the currently undeveloped allocation of Rural-Residential zoned land) from future lifestyle development • Introduces unplanned urban traffic volumes and an urban road typology into a rural residential and rural area, in conflict with the Eldonwood South Structure Plan • Forces unplanned public three-waters servicing to be extended to an area not sequenced for reticulated services. 	<p>Whilst I agree that the proposal is not something that was considered in the preparation of the MPDC Growth Strategy, it’s a mere consequence of legislation timing. As stated above, schedule 5 17(1)(c) of the FTAA provides for consideration of “the provisions of any other legislation that directs decision making under the RMA”. In this case, the MPDC Growth Strategy is a relevant matter that a consent authority must have regard to under section 104(1)(c) of the RMA. Of note, the MPDC Growth Strategy is not a document requiring assessment under clause 5(2) of Schedule 5 of the FTAA.</p> <p>The MPDC assessment focuses on a metric departure from the growth strategy and doesn’t acknowledge the opportunity and benefit of development provided for through new legislation such as the FTAA, for which the intent and objectives of the Growth Strategy could still be met.</p> <ul style="list-style-type: none"> • The Ashbourne proposal will provide support for the objectives of the Growth Strategy by increasing land and housing supply well ahead of any acute shortages. This can improve affordability and welfare by easing price pressures and giving consumers more choice. • A multi-year construction stimulus on a scale Matamata has not seen before. The

Summary of MPDC Assessment	Applicants Response
	<p>project entails over \$500 million of investment, which translates into construction jobs, local business for suppliers, and increased consumer spending over the build-out period. This level of construction activity is unlikely to occur in the area without Ashbourne, and its timing (sooner rather than later) helps sustain the regional construction sector.</p> <ul style="list-style-type: none"> • Accelerated housing availability to address demand. By delivering housing now, the project helps alleviate pressure sooner. This has positive spillovers: preventing sharp price escalations that might occur if demand exceeds supply, and enabling employers in the region to attract workers (since housing will be available). Earlier availability of housing yields a time value of benefits – people can form households or move to the area sooner, contributing to the economy sooner. • Diversification of housing typologies. Ashbourne’s mix of housing types (from standalone homes to townhouses and apartments, plus retirement units) broadens the regional housing stock. This addresses niche demands (e.g., downsizers, small households) that are underserved, improving overall welfare. A more diverse housing supply also tends to improve market efficiency, as consumers can find products closer to their preferences. • Expansion of the labour pool and economic base. By growing Matamata’s population beyond the status quo trend, the project effectively adds human capital to the region. New residents (including commuters and remote workers) will contribute to both the Waikato and Bay of Plenty economies. A larger population also supports local businesses and services, creating a virtuous cycle of growth.

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	<ul style="list-style-type: none"> • Renewable energy generation as a positive externality. The integrated solar farm (energy precinct) in Ashbourne provides additional clean electricity to the grid. This is a regional benefit in line with national sustainability goals – it improves energy security and reduces carbon emissions. The value of this environmental benefit accrues broadly and is not something that would happen on this site without the project (the status quo of farming contributes no such benefit). • Increased competition and choice in the development market, consistent with the NPS-UD’s objectives. Ashbourne introduces a large new development led by an experienced developer, which will spur competitive outcomes – for example, other developers may respond by innovating or accelerating their projects. Consumers (home buyers and renters) benefit from more choices and potentially more competitive pricing region-wide, not just within Matamata. <p>The Eldonwood Structure Plan is indicative, broad and sets a level of direction that allows development to work within its framework. The Structure Plan anticipates vested roads and it is common place to have a series of local roading networks feed off of a Collector Road network. The proposal, incorporates a holistic approach to managing a large area of cohesive land that provides connectivity options to existing urban edges and doesn’t preclude future connections to vacant neighbouring land with servicing.</p> <p>Traffic generation is an effect that can be managed by conditions of consent that ensure vested roading infrastructure aligns with the regional technical specifications.</p> <p>With regard to water infrastructure servicing, all proposed infrastructure within the Ashbourne development will be fully paid for by the applicant/developer. Some larger upgrades</p>

Summary of MPDC Assessment	Applicants Response
	<p>outside the site, such as wastewater storage tanks at existing wastewater pumpstation and transport, will be part-funded by MPDC as they also benefit the wider Matamata community. These funding arrangements are being formalised through a Private Developer Agreement which is close to being agreed so that ratepayers are not unfairly burdened reiterating Growth pays for Growth.</p> <p>Overall, it is considered that greater weight should be placed on the purpose of FTAA and NPS-UD (section 104(1)(b)(iii) of the RMA) than the Matamata Town Strategy. In this case, and for the reasons outlined above, the benefits of the Ashbourne Development and consistency with Section 3 of the FTAA outweigh the inconsistencies with the Matamata Town Strategy.</p>
<p>3.2 The adverse effects which the Council anticipate on Matamata's future growth that cannot be avoided are:</p> <ul style="list-style-type: none"> • Lead to increased hazard risks, due to uncertainty about the suitability of the Ashbourne site for urban-scale development as set out in the evidence of Tony Cowbourne • Displace a large part of future residential development planned for the eastern periphery, to an unplanned location in the south-western corner, leading to effects on connectivity, access, urban form, character, and functionality • Draw increased traffic through local residential streets, not planned or engineered to function as collector roads, with adverse traffic safety, efficiency, and amenity effects as set out in the evidence of Alastair Black • Occupy a sizeable portion of the vacant Rural-Residential zoned land, likely to result in a shortage of zoned land available for lifestyle living and loss of lifestyle living opportunities, a popular housing choice for most provincial towns, including Matamata • Require reticulated public services to be extended to an unplanned location, with associated loss of efficiency, and disruption 	<p>The Ashbourne Development has been informed by a suite of technical assessments to ensure potential adverse environmental can be avoided or appropriately mitigated. Detailed responses to comments with respect to areas of expertise are attached. The following comments are also provided with respect to those specific effects raised by MPDC:</p> <ul style="list-style-type: none"> • The suitability of the Ashbourne site for future development with respect to geotechnical consideration and land stability has been confirmed by CMW Geosciences. • The displacement of future residential development has been addressed in the Economic Memorandum by Insight Economics. • The Ashbourne site that is proposed to be developed for urban residential activities is predominantly located within the planned urban area. Furthermore, and based on the Urban Design and Transport Assessments, it is considered that the Ashbourne

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	<p>to the town's infrastructure planning and funding models</p> <ul style="list-style-type: none"> • Slow the pace of development in the areas earmarked for future residential development, delaying the delivery of integrated infrastructure within the eastern structure plan areas • Lead to incompatibility with the receiving environment, resulting in adverse effects on the planned and emerging rural residential character and amenity of the Eldonwood South Area of Matamata • Lead to sub-optimal urban design outcomes due to the lack of connectivity, interface conflict, reverse density transition, uncertainty regarding the quality of built form outcomes and difficulty in managing "out of zone" built form as described in the evidence of Ian Munro. 	<p>development will deliver a connected and safe road layout.</p> <ul style="list-style-type: none"> • In accordance with the findings of Economic Response Memorandum, it is considered that the scale of the loss of land for lifestyle living is limited. Furthermore, Ashbourne will improve housing choice, supply, and affordability overall through the delivery of new homes and typologies that are not readily available within the existing market. • Options for infrastructure servicing and delivery are outlined in detail below. In summary, there are multiple mechanisms to deliver infrastructure while ensuring that the associated costs can be internalised to the proposed development. As such, Ashbourne will not delay the delivery of integrated infrastructure elsewhere within the District. • As outlined in the AEEs and Urban Design Assessment, potential adverse effects on the planned and emerging character of the surrounding environment will be mitigated through the location and design of the proposed residential lots (including internalising the location of higher density lots), a considered height strategy, separation from external site boundaries, and a considered landscaping strategy. It is considered that these factors will ensure that the proposal can integrate with the existing receiving environment, particularly in the context of Station Road, which includes a transition between the existing rural and urban environments. • The urban design matters raised by MPDC are addressed in detail in the attached Urban Design Response Memorandum and Residential Design Guidelines.
3.3	Were the Ashbourne project to proceed, the Council consider that the approval should be conditional on the applicant:	The connection to Firth Street requires MPDC to designate a connection. The applicant is

Summary of MPDC Assessment		Applicants Response
	<ul style="list-style-type: none"> Proving the viability of the Firth Street connection into Ashbourne, including assessment of the impact/potential upgrade of the Firth Street/SH27 intersection (refer evidence of Alastair Black) Working with MPDC to secure the route of the connection, such as through the designation process; Agreeing to a fair and equitable funding model to facilitate the construction of the connection, noting that the Council does not currently have funding available for this work that will need to be brought forward because of Ashbourne; and Agreeing to complete the construction of the road connection during the initial stages of the Ashbourne development 	<p>supportive of this and has committed to delivering the corridor once the designation is in place. The designation process is not something that forms part of the applicant's referral scope and is outside the scope of this proposal.</p> <p>I defer to the comments made by Commute on this matter, for which I agree.</p> <p><i>"The wider network effects of the implementation of the Firth Street connection will need to be assessed as part of the notice of requirement. This will likely include the impacts on the Firth Street/SH27 intersection.</i></p> <p><i>This intersection can also be reviewed periodically as part of the staged ITA assessments."</i></p> <p>The application and master planning that has been undertaken for the wider Ashbourne development has not precluded the option of a connection to Firth Street in the future.</p>
	<p>From a planning perspective, the submitter considers that the early establishment of the Firth Street connection is vital because of the uncertainty on timing of construction of the various stages and components of Ashbourne, the potential for overlap in construction of different stages and associated cumulative effects, and the likelihood that different components and stages of the development will be implemented by separate developers with their own timeframes and objectives.</p>	<p>Commute's transport assessments that have been completed to date identify the transport infrastructure upgrades that are required to be implemented as the Ashbourne development is progressed in stages over time. Their assessment identifies specific infrastructure necessary to enable each stage of development. These upgrades will be required to be delivered through consent conditions to ensure transportation effects can be appropriately managed and that the required infrastructure is clearly identified to developers. Overall, it is considered that the early establishment of the Firth Street connection is not necessary and transportation effects can be appropriately managed in accordance with the sequencing of works identified by Commute.</p>
4	Conclusion	
4.1	<p>The submitter considers there is no need to fast-track the Ashbourne development that has significant consequences on the future growth of Matamata for the following reasons:</p>	<p>Please refer to the comments provided above and the Economic Memorandum prepared by Insight Economics (Attachment 7).</p>

Summary of MPDC Assessment	Applicants Response
<ul style="list-style-type: none"> • Economic evidence shows that Council's current growth strategy provides for adequate housing capacity in the short, medium, and long-term, and that Ashbourne is likely to displace development from a planned to an unplanned location • Available land parcels that are live-zoned for residential development are held in multiple separate ownership, diverse in area, and include large land holdings of adequate size to accommodate retirement living options. • There is a high level of interest from developers to advance residential development proposals on Residentially zoned land and in the "Future Residential Policy Area" by way of private plan changes. • Adding Ashbourne to the supply of developable land is unlikely to improve affordable housing outcomes, noting that Ashbourne has not carried forward the Cultural Impact Assessment's recommendation to ring-fence 5% of the housing supply to meet affordable housing criteria. 	<p>The FTAA has been intentionally designed to facilitate the accelerated delivery of projects with substantial scale and significance. The Ashbourne proposal has already been successfully referred by the Minister, confirming that it meets the statutory threshold for progression under the FTAA. Through the referral process, the project demonstrated, in accordance with section 22(1)(b)(i), that fast-track consenting is the most efficient and effective pathway for its delivery. The FTAA provides a comprehensive, integrated consenting framework - a single process that captures all required approvals, including those under the NES, and regional and district plans, ensuring a streamlined and coordinated approach to authorising the full suite of project activities.</p>
<p>4.2 Considering that Ashbourne proposes to disrupt the Town's growth strategy, and given there is no pressing need to set additional land aside for residential development, it is more appropriate for Ashbourne to advance through a conventional Schedule 1 RMA private plan change process than to seek fast track approval.</p>	<p>Please refer to the comments provided above and the Economic Memorandum prepared by Insight Economics (Attachment 7).</p> <p>The FTAA has been intentionally designed to facilitate the accelerated delivery of projects with substantial scale and significance. The Ashbourne proposal has already been successfully referred by the Minister, confirming that it meets the statutory threshold for progression under the FTAA. Through the referral process, the project demonstrated, in accordance with section 22(1)(b)(i), that fast-track consenting is the most efficient and effective pathway for its delivery. The FTAA provides a comprehensive, integrated consenting framework - a single process that captures all required approvals, including those under the NES, and regional and district plans, ensuring a streamlined and coordinated approach to authorising the full suite of project activities.</p>

Summary of MPDC Assessment	Applicants Response
	Furthermore, a Schedule 1 RMA plan change process only deals with the rezoning of land with different assessment criteria and weightings to the FTAA. The plan change process would fall short of allowing physical development to occur in a time and cost-efficient manner.

1.2 Memorandum 2 - Review of the Applicant's Assessment of the Application under Part 2 RMA and relevant planning documents

Memorandum 2 of the Planning Evidence supplied by MPDC provides a review of the proposal under Schedule 5, s5(1)(g) and s5(1)(h) of the FTAA against the purpose of the RMA (s5-7 RMA) and the provisions of relevant standards and policies.

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2.0 Relevant Planning Documents	
2.1	<u>Te Ture Whaimana o Te Awa o Waikato</u>
Council agree that the Te Rautaki Tāmata Ao Turoa I Hauā - Ngāti Hauā Environmental Management Plan, and the Tai Tumu, Tai Pari, Tai Ao - Waikato-Tainui Environmental Plan are relevant to the proposal. However, Council consider that the Te Ture Whaimana o Te Awa o Waikato – Vision and Strategy for the Waikato River is <i>not</i> relevant, and that the Ashbourne site sits within the Hauraki catchment. Therefore, s7 and s8 of the Hauraki Gulf Marine Park Act 2000 (“HGMPA”) that has the status of a national policy statement under the RMA is relevant and should be assessed by the applicant	<p>We have sought comment from iwi and agree with their findings as per below:</p> <p>We know Te Ture Whaimana o Te Awa o Waikato is applied within the Waikato River catchment, which Raukawa and Ngāti Haua are connected. The vision and strategy for the awa includes key fundamental objectives, mechanisms and outcomes that focus on what is best for the awa, taiao, and the wider environment.</p> <p><i>“While Te Ture Whaimana does not apply legally within Matamata, the relevant objectives, mechanisms, and outcomes reflect what mana whenua seek to apply to the Ashbourne development. The focus is on ensuring the best outcomes for receiving waterways, whenua, and taiao overall.</i></p> <p><i>Essentially, Te Ture Whaimana provides a framework to guide development in a way that supports intergenerational wellbeing and the long-term health of the environment.</i></p> <p><i>Similarly, the relevant environmental management plans of Raukawa and Ngāti</i></p>

	<p><i>Haua align with the principles, approaches, and outcomes of Te Ture Whai Mana.</i></p> <p><i>This is the reason why Te Ture Whaimana was referenced within our report.</i></p> <p><i>Kona te hiahia o mana whenua.</i></p> <p><i>Mauri ora.”</i></p> <p><u>Hauraki Gulf Marine Park Act 2000</u></p> <p>The Ashbourne development lies within a catchment that ultimately drains to the Hauraki Gulf, triggering obligations under the Hauraki Gulf Marine Park Act 2000 (HGMPA), which recognises the national significance of the Gulf, including its life-supporting capacity and the interrelationship between its catchments, water, soil, and ecosystems.</p> <p>The Ashbourne application addresses these obligations through comprehensive stormwater management, greenway design, and ecological impact mitigation in its Assessment of Environmental Effects. By incorporating multi-functional greenways and stormwater devices, and managing runoff carefully, the proposal demonstrates a commitment to protecting the water resource and minimising adverse effects of terrestrial development on downstream coastal and marine environments. In addition, the project’s inclusion of large areas for solar farms and planned native vegetation plantings indicates a longer-term contribution to environmental sustainability, aligning in part with the HGMPA objective of “protection and, where appropriate, enhancement” of the natural and physical resources of the Gulf’s catchments.</p> <p>The proposal’s design demonstrates awareness of the interrelationship between catchments, water, soil and ecosystems, particularly through its greenway corridors, stormwater management infrastructure, and ecological controls, all of which help protect water quality and the downstream ecological links that sustain the Gulf’s life-supporting</p>
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		<p>capacity, consistent with Section 7 of the HGMPA.</p> <p>The Ashbourne application aligns with the objectives in Section 8 of the HGMPA in several meaningful ways. Its native planting and open-space greenways contribute to ecological resilience, enhancing habitat connectivity and potentially improving soil and water stability. The inclusion of solar farm land use also reflects a long-term sustainable approach to land development, contributing to low-carbon infrastructure while retaining portions of productive land. Moreover, the proposal includes amenity and recreational green spaces which can positively contribute to community wellbeing.</p> <p>Overall, it is considered that Ashbourne demonstrates meaningful recognition of HGMPA obligations. Given its integrated design and mitigation strategies, the project can be considered broadly consistent with the HGMPA's purpose, provided that the proposed environmental safeguards through conditions are implemented effectively and monitored over time to manage downstream effects on the Hauraki Gulf.</p>
2.2	The applicant should provide an assessment under the National Environmental Standards for Freshwater 2020 ("NES-F") to confirm that the application, which includes earthworks within 100m and vegetation clearance within 10m of an identified wetland, does not require consent under the NES-F	The Applicant agrees that consent is required under the NES-F, and relevant assessment is provided in Section 1.6 of this response.
2.3	Note that the Ashbourne site is in the takiwā of Ngāti Raukawa, and the Te Rautaki Taiao a Raukawa – Raukawa Environmental Management Plan is a relevant iwi planning document that is referred to in the CIA but not specifically addressed by the applicant	We worked with iwi and hapū in the lead up to the lodgement of the Ashbourne substantive application. From discussion with iwi and hapū, we agreed with the conclusions in the CIA and felt and continue to do so that it is appropriate to rely on that assessment rather than complete our own.
3.0	Comments on the Applicant's Assessment	
	Council generally agree with the applicant's assessment of the solar farm component of the application under the relevant planning documents. Regarding the remaining components, as far as matters under the	Noted. No response required in relation to the solar farms. Responses on the NPS-HPL, NPS-UD, RPS and MPDP are provided below.

	jurisdiction of MPDC are concerned, Council generally agree with the applicant except for assessment under the NPS-HPL, NPS-UD, RPS, and MPDP.	
3.1	NPS-HPL	
3.1.1	<p>The application is factually incorrect where it states that the land destined for residential, commercial and retirement living components has been identified for urban development in the “Waikato Housing and Business Capacity Assessment” and “Future Proof Strategy” and responds to identified housing shortages as outlined in the “Waikato Housing and Business Capacity Assessment” and “Future Proof Strategy”, because:</p> <ul style="list-style-type: none"> • The applicant’s reference to the “Waikato Housing and Business Capacity Assessment” is a reference to documents prepared by Hamilton City Council, Waikato District Council, Waipā District Council, and Waikato Regional Council, and contain no information regarding housing development capacity in the Matamata-Piako District • For Matamata, the “Future Proof Strategy 2024 – 2054” contains MPDCs current urban development strategy, confining the “Urban Enablement Area” to the “Future Residential Policy Area” located on the eastern side of Matamata, and limiting the “Rural Residential Zone” to “lifestyle” developments • In terms of capacity, the FPS considers that Matamata has sufficient residential capacity to cater for the next ten years, with land in the “Future Residential Policy Area” able to cater for development over the longer term. <p>Overall, the documents relied on by the applicant do not provide support for the contention that the Ashbourne development is consistent with the NPS-HPL.</p>	<p>We disagree with the conclusions reached by MPDC. Please refer to the Economic Memorandum prepared by Insight Economics, Attachment 7. The economic memorandum clarifies:</p> <ul style="list-style-type: none"> • The current Housing Capacity Assessment (HCA) for Matamata is unreliable and likely overstates supply while understating future demand. The assessment uses an opaque model, unrealistic assumptions, and inconsistent outputs, making its estimates fundamentally flawed; and • Proactively enabling Ashbourne now aligns with government policy and offers significant benefits. It strengthens the housing pipeline, improves affordability and choice, fosters market competition, and can attract new residents—helping grow overall demand rather than just redistributing existing growth. <p>We consider the economic memorandum provides clear grounds and support for our assessment and assumptions in relation to the NPS-HPL.</p>
3.1.2	For the Ashbourne application, the relevant sections of the NPS-HPL are Clauses 3.8, 3.9, and 3.10, as opposed to Clause 3.6 assessed by the applicant.	Please refer to the comprehensive <i>NPS-HPL Response</i> which addresses this comment.
3.1.3	Clause 3.8 requires territorial authorities to <u>avoid</u> subdivision, unless one of three exceptions applies. For the Ashbourne application, sub-clause 1(b) and (c) do not apply. Sub-clause 1(a) and 2(a) and (b) apply, and the applicant’s assessment has not demonstrated that the proposed Lots will retain the overall	Please refer to the comprehensive <i>NPS-HPL Response</i> which addresses this comment in detail. Specifically, we draw attention to the technical input from Landsystems and AgFirst and the application of Clause 3.10.

	productive capacity of the subject land, that the subdivision will avoid or mitigate the potential cumulative loss of highly productive land, and that reverse-sensitivity effects on surrounding primary production activities can be avoided or mitigated	
3.1.4	Clause 3.9(1) requires territorial authorities to <u>avoid</u> inappropriate use or development of highly productive land that is not land-based primary production unless at one of a discrete number of exceptions in sub-clause 2 applies. The Ashbourne proposal does not meet any of the exceptions provided for in sub-clause (2).	Please refer to the comprehensive <i>NPS-HPL Response</i> . We note that Clause 3.9 is applicable to the solar farm component of the Ashbourne proposal.
3.1.5	Clause 3.10 allows for exemptions to the NPS-HPL where highly productive land is subject to permanent or long-term constraints. Based on the evidence provided in Annexure F, it is the submitters view that the subdivision and residential/"greenway"/retirement living components of the Ashbourne application within the "Rural Zone" are inconsistent with the NPS-HPL.	Please refer to the comprehensive <i>NPS-HPL Response</i> which addresses this comment in detail. Specifically, we draw attention to the technical input from Landsystems and AgFirst and the application of Clause 3.10.
3.2	National Policy Statement on Urban Development 2020 ("NPS-UD")	
3.2.1	Agree that the proposal is not inconsistent with Objective 1 of the NPS-UD, in that it will augment the supply and variety of housing options available in Matamata and support competition in the housing sector.	Noted. No response required.
3.2.2	The application is inconsistent with Objective 6 in that it is not integrated with MPDC's infrastructure and funding decisions, because the development is in the "Rural" and "Rural Residential" zones that are not currently served, or planned to be served, by public infrastructure. The proposal is also inconsistent with MPDC's strategic growth planning. MPDC's current forward planning provides adequately for the expected housing demand, in an integrated and well-planned manner that supports the Matamata community's wellbeing and can accommodate a variety of housing options. The proposal represents a major shift from MPDC's current strategic planning, to create housing capacity that as stated in the evidence of Tim Heath, is unlikely to be required, and thus is inconsistent with the outcomes envisaged under the NPS-UD.	<p>The proposal will integrate with MPDC reticulated wastewater, water and roading network. Further solidified by a PDA with MPDC.</p> <p>The proposal integrates with the existing urban environment with well-connected streets and alignment with the Eldonwood Structure Plan. It does not preclude future connectivity i.e. Firth Street and accelerates and provides for a particular demand (as described in Insights response).</p> <p>We disagree that it's a 'Major Shift' in MPDCs strategic planning. While the proposal is not specifically in a location that may have been identified, it's one that can be delivered at scale efficiently and in suitable proximity to the urban edge of the township. The outcomes that will be realised by the development are</p>

		comparable and will improve Matamata community's wellbeing.
3.3	Waikato Regional Policy Statement (RPS)	
3.3.1	Objective UDF-01 – Built Environment Sub-clauses 3 and 12(b), (d), and (e) of Objective UDF-01 are relevant to the assessment of the Ashbourne proposal. Clauses 1 and 5 of UDF-P2 that underpins UDF-01 are also relevant. With reference to these directives, Council disagree with the applicant's assessment for the following reasons	Please see comments below.
3.3.2	<p>The Eldonwood South Structure Plan provides for low density rural-residential development at the urban-edge of Matamata, to form an appropriate interface with the adjoining "Rural Zone". The low density land-use provided for in the Structure Plan responds to the geotechnical constraints of the area. The road network identified in the Structure Plan is based on the low traffic volumes commensurate with the planned future low-density rural-residential settlement, comprising narrow carriageways with open swales within the berm, as opposed to an urban road typology featuring wider carriageways, on-street parking, and footpaths.</p> <p>Consistent with MPDC's established approach to development within the District's "Rural Residential" zones, no provision has been made to provide public reticulated services for the Eldonwood South Structure Plan Area. As for most of the District's "Rural Residential" zones, on-site servicing is envisaged for the Eldonwood South Structure Plan Area.</p> <p>It follows then that the Eldonwood South Structure Plan Area is not "an identified location for urban development" as stated by the applicant. The urban-style development proposed by Ashbourne is also contrary to MPDC's infrastructure delivery and land use strategy, and in conflict with the character of the existing/ emerging rural-residential built environment.</p> <p>In summary, the Ashbourne proposal does not "reinforce the urban form and infrastructure investment of Matamata" as stated by the applicant. In fact, the proposal is contrary to MPDC's growth planning and investment</p>	<p>We agree with the MPDC assessment surrounding the intent of the existing zoning and associated Eldonwood Structure Plan within an RMA lens. Whilst this application is made under different legislation (FTAA) and the existing zoning and information that MPDC hold on the site is now outdated. The updated engineering and specialist hydrology, master planning, traffic and geotechnical advice provides suitable grounds to consider and consent development that aligns with the intent of the FTAA with supporting infrastructure.</p> <p>Below is an updated assessment of UDF01 and UDFP2.</p> <p><u>UDF01 comment.</u></p> <ul style="list-style-type: none"> • Diverse and Changing Needs: The project provides for the diverse needs of the community by offering a range of housing typologies, including approximately 520 residential dwellings, 218 retirement living units, and an aged-care hospital. This variety addresses the identified housing shortfalls and affordability issues in the Matamata-Piako District. • Compact Urban Form and Integration: The development is located adjacent to the existing Matamata urban area, promoting a compact urban form and efficient use of land, which avoids sporadic settlement patterns. It is designed to integrate with existing infrastructure, transport routes, and natural features.

<p>strategy as outlined in Memorandum 1, and inconsistent with RPS directives UFD-O1 and UFD-P2 assessed above.</p>	<ul style="list-style-type: none"> • Accessibility and Connectivity: The development's design, including a street network that prioritizes active transport (walking and cycling), enhances accessibility to Matamata's town centre and schools, reducing car dependency and supporting reductions in greenhouse gas emissions. • Climate Change Resilience and Mitigation: Climate change considerations are integrated into the design, including managing flooding hazards through a comprehensive stormwater greenway system. Indigenous planting is proposed to enhance carbon sequestration and ecosystem resilience. • Integrated Infrastructure: The proposal ensures the safe, efficient, and effective provision of infrastructure by integrating on-site stormwater management and extending public networks for wastewater and water supply, in coordination with the local authority. • Cultural and Environmental Wellbeing: Meaningful engagement with Ngāti Hauā, Ngāti Hinerangi, and Raukawa has occurred, ensuring iwi values are considered in shaping the development and the project includes measures to protect and enhance natural features like wetlands and water bodies, consistent with the principle of Te Mana o te Wai. <p><u>UFDP2 comment.</u></p> <ul style="list-style-type: none"> • Meeting Identified Housing Demand: The development contributes approximately 520 new dwellings, 218 retirement village units, and an aged-care hospital. This directly responds to the significant shortfalls in long-term housing capacity in the Matamata-Piako District identified in the Waikato Housing and Business Capacity Assessment (HBA) and the Future Proof Strategy. • Providing for Short, Medium, and Long-Term Capacity: The project is a large-scale, staged development that ensures land and housing capacity are available across the short, medium, and long term, a key requirement of the policy. • Integrated Infrastructure Planning: The development is designed to integrate with
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		<p>and build upon existing infrastructure adjacent to the current Matamata urban area. The plan proposes that infrastructure will be delivered through a staged approach, in conjunction with the territorial authority, ensuring that new urban areas are adequately supported by planned infrastructure, community facilities, and services.</p> <ul style="list-style-type: none"> • Promoting Compact Urban Form: By being located adjacent to the existing urban area and within an identified future urban expansion area, Ashbourne promotes a compact urban form and avoids inefficient or sporadic patterns of settlement. • Aligning with Strategic Growth Direction: The proposal aligns with the strategic growth directions identified in the Future Proof Strategy 2024, which supports well-planned greenfield development near existing urban footprints
3.4	Operative Matamata-Piako District Plan (MPDP)	
3.4.1	<p>Sustainable Management Strategy</p> <p>Application is contrary to the provisions that seek to:</p> <ul style="list-style-type: none"> • protect highly productive land; because it withdraws additional highly productive land from the District's finite resource. This is the case as adequate land that is excluded from the NPS-HPL has already been set aside for residential development within the zoned "Future Residential Policy" overlay; • ensure the integrated planning of landuse and infrastructure; because it proposes development in an area not planned to be served by reticulated infrastructure or urbanstyle roading; • consolidate residential development within existing zone boundaries; because it proposes out-of-zone development. 	<p>With regard to the protection of highly productive land and the location of residential development within existing zone boundaries, it is acknowledged that the proposed retirement village in particular will not be consistent with relevant provisions. However, it is considered that on balance, Ashbourne does not represent an inappropriate development outcome, particularly given the locational context of the wider site adjoining the Eldonwood Structure Plan area and existing urban area of Matamata. As also outlined by Landsystems and AgFirst in the <i>NPS-HPL Response</i>, the land within the Ashbourne site has permanent and long term constraints which limit its productive potential and the ability to be considered highly productive land.</p> <p>As outlined in the transportation and civil infrastructure responses, Ashbourne can be adequately serviced by transportation and three waters infrastructure as development is progressed in stages. This will ensure potential adverse infrastructure effects can be appropriately managed and that land use is integrated with the delivery of infrastructure.</p>

<p>Amenity</p> <p>Contrary to the provisions that seek to maintain character and amenity values; because it proposes development that is inconsistent with the emerging and planned character and amenity values of the “Rural Residential” zone</p>	<p>As outlined in the Urban Design Response Memorandum, the Ashbourne Development incorporates a number of design features to avoid and mitigate potential effects on character and amenity values. A number of additional amendments are also proposed to be made as. In summary, the incorporation of edge treatments, including setbacks, planting, fencing, and height and coverage controls will deliver a considered and appropriate transition between the Ashbourne site and existing environment, including the Rural Residential zone. Overall, it is considered that that the proposal will achieve a high standard of amenity in the built environment, in keeping with the relevant objectives and policies under the MPDP.</p>
<p>Transportation</p> <p>Contrary to the provisions that seek to ensure a well-connected transport network; because Ashbourne lacks integration with the Town’s wider roading network and pedestrian/cycling connections and thus is unlikely to support active modes of transport beyond the limits of the Ashbourne site itself.</p>	<p>As outlined in the Transportation Response Memorandum, Ashbourne includes provisions for new roading connections to the existing network, including to Station Road and Peakedale Drive. New roads will include provision for new pedestrian and cycling connections within the Ashbourne site, and the proposal does not preclude the upgrading of transport infrastructure within the wider network and beyond the limits of the Ashbourne site to enhance pedestrian and cycling amenity, access, and connectivity.</p>
<p>In addition, the proposal is inconsistent with many of the objectives and policies in the MPDP, as outlined in Table 1 attached to Memoranda 2.</p>	<p>Volumes 3-5 of the Ashbourne AEEs contain assessment against the relevant objectives and policies of the MPDP in accordance with Clauses 5(1)(h), 5(2), and 5(3) of Schedule 5 of the FTAA and those assessments are not repeated. Overall, we consider that the Ashbourne proposal is consistent with the exception of provisions related to highly productive land and consolidating residential development.</p> <p>Given the <i>NPS-HPL Resposne</i> which clarifies the nature, extent and significance of the constraints impacting highly productive land, on balance we consider the benefits of the</p>

		Ashbourne proposal outweigh the impact of inconsistency with the highly productive land provisions.
3.5	Part 2 RMA	
3.5.1	Memorandum 1 shows that the proposal will result in long-term adverse effects that are more than minor, and that cannot be avoided, on the planned, funded, and integrated delivery of infrastructure and urban growth for the town of Matamata.	Based on the responses to comments that have been provided, and including technical responses from experts, adverse effects, including in relation to the delivery of infrastructure, can be appropriately managed under the Ashbourne proposal. In addition, the potential adverse effects on the environment are not considered out of proportion to the benefits that will be achieved, including in particular with respect to increases in housing supply and choice and the delivery of renewable energy generation.
3.5.2	Memorandum 1 shows that the MPDP provides adequately for the future growth of Matamata in an integrated manner and that the Ashbourne proposal will displace planned development to an unplanned location without creating additional social, economic, or cultural benefits for the community;	As assessed in the Economic Memorandum (Attachment 7), the supply and of housing capacity relied on by MPDP is overstated, and the future need and demand is understated. Notwithstanding this, the Ashbourne proposal will provide increased housing supply well ahead of any acute shortages, improving affordability by easing price pressures and improving housing choice. This provision of housing to accommodate future growth is consistent with Policy 2 of the NPS-UD, which requires all local authorities to provide <i>at least</i> sufficient development capacity to meet demand for housing over the short, medium, and long term. We agree with the assessment in the Economic Memorandum that the relevant statutory and policy frameworks discourage a reactive 'just-in-time' approach, and that Ashbourne will contribute to maintaining a surplus capacity that supports competitive land and development markets, consistent with Objective 2 of the NPS-UD.
3.5.3	The proposal to utilise "Rural" zoned land for residential and retirement living is not an efficient use of the District's finite resource of highly productive land	The use of Rural zoned land proposed for residential and retirement living represents less than half of the total Ashbourne Site. In addition, and as outlined in the NPS-HPL Response, the land is subject to permanent and long-term constraints which limit productive potential. On this basis, the loss these soils is considered to be an acceptable development outcome, particularly when considered in the context of the NPS-HPL framework.
3.5.4	The proposal does not maintain or enhance the planned and emerging character and amenity of	As outlined above and further detailed in the Urban Design Response Memorandum,

	the rural and rural residential receiving environments	Ashbourne incorporates numerous edge treatments to achieve a considered transition between the proposed development and existing rural residential environment. Combined with new planting and landscaping, and the implementation of the Design Guideline for future buildings, it is considered Ashbourne will maintain and enhance amenity values, consistent with section 7(c) of the RMA.
3.5.5	Except for vesting of the esplanade reserve (for which MPDC does not currently have the funding in place), the application does not include any initiatives for preserving and enhancing the natural character, ecological values, and function of the Waitoa River corridor, nor does it enhance public access along the River.	The Ashbourne proposal includes new native riparian planting within the greenway, which will support the restoration of biodiversity, strengthen ecological connectivity, and support freshwater habitat. The greenway will include publicly accessible walkways, cycle paths, and passive recreation areas. Combined with the vesting of the esplanade reserve (in accordance with the requirements of Rule 6.2.6 of the MPDP and section 230 of the RMA), Ashbourne will enhance natural character and ecological values. Provision for public access is also made. Overall, Ashbourne will provide for the relevant matters of national importance identified under sections 6(a) and 6(d) of the RMA.
3.5.6	Taking the above into account, it is my assessment that, except for the solar farms, the rest of the Ashbourne proposal is inconsistent with the sustainability purpose of the RMA. There is no functional need for the solar farms to establish in the location applied for (there are numerous options elsewhere in the District). Therefore, the addition of the solar farms to the overall Ashbourne proposal does not provide a basis for condoning the inconsistency of the other components of the integrated application with the purpose of the RMA.	<p>For the reasons outlined above and set out within the Volume 2-5 AEEs, the Ashbourne proposal will achieve the sustainable management of natural and physical resources. In particular:</p> <ul style="list-style-type: none"> • Consistent with section 5(2), Ashbourne provides for the use, development, and protection of natural and physical resources that will deliver significant regional benefits in terms of housing delivery and increasing housing supply and choice, providing economic uplift, and contributing to renewable energy generation. Collectively, Ashbourne will provide for the social, economic, and cultural well-being of people and communities. • Consistent with section 5(2)(a), Ashbourne provides for the protection of natural resources, including freshwater systems, to meet the reasonably foreseeable needs of future generations.

	<ul style="list-style-type: none"> Consistent with section 5(2)(b), Ashbourne proposes to locate the majority of urban residential development on land that is located within the existing urban environment. The proposed solar farm will also provide for on-going productive land uses to occur within the sites. While there is a limited extent of urban activities proposed to be located on land which is defined as highly productive soils, this land is subject to permanent and long-term constraints which limit productivity. For these reasons, it is considered that Ashbourne will safeguard the life-supporting capacity of soil resources. The proposal also includes ecological enhancement and careful stormwater management measures to safeguard the life-supporting capacity of water and ecosystems. Consistent with section 5(2)(c), Ashbourne incorporates a range of measures to adequately avoid and mitigate adverse effects on the environment. These measures have been integrated into the proposal and will be secured through conditions of consent during development phases.
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1.3 Memorandum 3 - Review of the Applicant's Assessment under the Statutory Scheme of the Fast-track Approvals Act 2024

Summary of MPDC Assessment		Applicants Response
2.0	The Council provide a summary of the FTAA legislation as it relates to decision making, and concludes that Section 85 of the FTAA requires a "proportionality assessment" of the significance of adverse impacts (after taking into account potential conditions and modifications to the proposal), when weighed against the project's regional or national benefits. Should the assessment show the adverse impacts are significantly out of proportion to the project's	As referred to earlier I draw on the conclusions by Insight Economics throughout their document that articulate clearly that <i>"Ashbourne's adverse impacts (loss of some HPL, rural lifestyle land, and added infrastructure demands) are moderate and can be mitigated, whereas its benefits are substantial and far-reaching – thus, the disproportion test is not met (the impacts are not out of proportion to the benefits, they are comfortably outweighed by them)."</i>

	<p>national or regional benefits, the FTAA provides discretion for an application to be declined.</p>	<p>In the round the development provides regional benefits comprehensively as package of benefits that when weighed against the projects potential adverse impacts are manageable and not out of proportion to the benefits identified below.</p> <ol style="list-style-type: none"> (1) Housing Market Benefits – Supply, Choice, and Affordability. (2) Optimising Land Use for Higher Value Outputs. (3) Multi year construction stimulus, accelerated housing availability, expansion of labour pool. (4) Renewable energy stimulus and generation. (5) Dynamic Efficiency – Future Growth Flexibility. (6) Infrastructure certainty. (7) Holistically, masterplanned and well thought out urban environment. (8) Enhanced natural environment – Greenway and esplanade planting at scale. <p>Furthermore we note and emphasise s85(4) as stated below, <i>the panel may not decline an application “To avoid doubt, a panel may not form the view that an adverse impact meets the threshold in subsection (3)(b) solely on the basis that the adverse impact is inconsistent with or contrary to a provision of a specified Act or any other document that a panel must take into account or otherwise consider in complying with section 81(2)”</i></p>
3.0	National/regional benefits	
3.2	<p>The applicant’s economic impact assessment has been reviewed for MPDC by Tim Heath (Property Economics). His evidence has updated MPDC’s Housing Capacity Assessment 2022 (HCA) with the conclusion that Matamata has more than sufficient capacity to meet its projected High demand growth over the Short-,</p>	<p>This view is disputed and accurately contested and responded to in full by Insight Economics. The response by insight is comprehensive and covers the following – in particular we rely on the conclusions that relate to point 5 below:</p> <ol style="list-style-type: none"> (1) Residential Capacity Sufficiency

	<p>Medium-, and Long-Term (including the demand for retirement living).</p> <p>This review disagrees that Ashbourne will stimulate or unlock latent demand in Matamata. In the review, it is considered that the proposal will result in a redistribution of demand as opposed to a stimulant for growth.</p>	<p>(2) Ability of the Proposal to Stimulate Additional Demand</p> <p>(3) Retirement Village Supply and Location Considerations</p> <p>(4) Loss and Efficient Use of Highly Productive Land (HPL)</p> <p>(5) Displacement of Economic Activity and Net Regional Benefit</p> <p>(6) Infrastructure Costs, Funding, and Network Efficiency</p> <p>(7) Overall Economic Efficiency</p> <p>(8) Conclusion</p> <p>(9) Appendix A: Review of Revised Dwelling Capacity Assessment</p>
3.3	<p>Regarding Infrastructure Costs, the economic review by Tim Heath concludes that there is no guarantee that full cost recovery will be achieved, or that the risk of wider community burden can be avoided. Even if all direct costs are recovered, he considers that the redistribution of growth will invariably slow the development of existing zoned areas, thereby raising the marginal cost of infrastructure and the duration over which Council must bear the associated financial cost.</p>	<p>Please refer to the comments provided above and the Economic Memorandum prepared by Insight Economics (Attachment 7).</p>
3.4	<p>In the view of Tim Heath, the proposal which substitutes productive agricultural land for no net gain in housing supply, constitutes an economic cost that should be factored into an assessment of the application's net benefits.</p> <p>He agrees that there are benefits surrounding the solar farms but considers that these benefits should not be conflated to provide support for a multi-faceted development primarily to secure one component, particularly where there is no guarantee that the applicant will proceed with the solar farms should that component later prove unviable.</p>	<p>Please refer to the comments provided above and the Economic Memorandum prepared by Insight Economics (Attachment 7).</p>
3.5	<p>Relying on Tim Heath's evidence, I consider that the applicant has over-stated the overall national/regional benefits of the Ashbourne project. I acknowledge that there is the potential for external drivers, such as the "Hamilton to Tauranga Corridor", to stimulate growth in Matamata. However the scale of growth</p>	<p>Our response relies on Insight Economics review of Mr Heath's evidence that concludes:</p> <p><i>"In my view, the PE report provides no meaningful insight into the actual need for the proposal. It is methodologically flawed, disconnected from</i></p>

	<p>anticipated by Ashbourne over the next ten years (and required to substantiate the benefits claimed) is, in my view, “blue sky thinking” of the type explored in a recent scenario paper: “Future Proof Spatial Study”³ with little to no probability of eventuating.</p> <p>The lack of evidence of demonstrated benefits should, in my view be factored into the proportionality assessment.</p>	<p><i>reality, and therefore of limited value. Accordingly, I patently reject the conclusions that Mr Heath makes about the need for the proposal based on its results.”</i></p> <p>The Waikato Region is one of the highest growing regions in New Zealand. Housing demand from a regional level is increasing which is tempered by affordability opportunity that Ashbourne can provide at scale for a range of age demographics.</p>
4.0	Alignment with the purpose of the RMA and relevant planning instruments	
4.1	<p>Based on my assessment, I have reached the conclusion that the application, in its current form, is inconsistent with the purpose of the RMA, the NPS-HPL, NPS-UD, the RPS and the MPDP.</p> <p>The inconsistencies are primarily the result of:</p> <ul style="list-style-type: none"> • Inefficient use of the District’s finite resource of highly productive land; • Conflict with the MPDP future growth strategy; • Lack of integration of landuse with planned infrastructure delivery and funding; • Lack of maintenance/ enhancement of character and amenity values. <p>The inconsistencies, on their own, do not in my view constitute an “adverse impact” of the kind referred to in s85(3) FTAA, that warrants consideration in the proportionality assessment. The proportionality assessment is based on the substantive significance of impacts relative to benefits (discussed in the next paragraph), not mere policy inconsistency.</p>	<p>Responding to the comments bullet pointed by MPDC below (in some instances referencing other documents for which we have responded in full), overall, we consider there is not a significant adverse impact.</p> <p>Inefficient use of the district’s finite resource of highly productive land - Please refer to the comprehensive <i>NPS-HPL Response</i> which addresses this comment with regards to the “Inefficient use of the district’s finite resource of highly productive land”. We consider this point has been addressed sufficiently.</p> <p>Conflict with the MPDP future growth strategy - please see comments above. We consider this point has been addressed sufficiently.</p> <p>Lack of integration of landuse with planned infrastructure delivery and funding – This has been overcome with a PDA that provides a pathway with costs associated to integrate public services with the Ashbourne development. The retirement village self-sufficient and will maintain in perpetuity costs associated with servicing the development. The solar development will physically integrate with the grid and provide power to the region, people and community. We consider this point has been sufficiently addressed.</p> <p>Lack of maintenance/ enhancement of character and amenity values - Please see Urban Design</p>

		response and comments above. We consider this point has been addressed sufficiently.
5.0	Adverse Impacts	
5.1	<p>Impacts associated with site suitability</p> <p>The evidence of Tony Cowbourne outlines significant development suitability constraints due to the site's geotechnical and hydrological characteristics.</p> <p>In parallel, the evidence of Bronwyn Rhynd and John Sternberg echo that significant uncertainties remain, and that the applicant's proposed stormwater management strategy and on-site wastewater disposal design are not robust, resilient, and "fit for purpose".</p> <p>In the absence of further information on potential mitigation measures, my conclusion is that the above adverse impacts and risks could potentially be significant. As matters stand at present, I consider that granting consent for the subdivision will be contrary to s106 RMA.</p>	<p>I refer to the updated Stormwater Assessment by MAVEN, geotechnical review and update by CMW and WGA memo that set out and provide more information that the stormwater and wastewater designs are suitable, workable and can be achieved without significant risk.</p> <p>I refer to the Maven Technical Response Memorandum sections 1 and 2 which provides a full response on to the concerns, lists further investigations that have now been undertaken and the proposed strategy in full.</p> <p>The updated design, stormwater and geotechnical responses enable there to in our opinion to be enough satisfactory evidence that s106 can be met as there is not a significant risk from natural hazard and access can be provided. In particular the stormwater amendments that provide for sufficient attenuation and treatment of Stormwater whilst managing the 'worst case' scenario of winter ground water tables.</p>
5.2	<p>Impacts relating to conflict with the planning context</p> <p>Memorandum 1 and 2 describe Ashbourne's conflict with the Eldonwood South planning context, and inadequate connections to the wider road network. In particular, the Memoranda describe the impact of Ashbourne on the character and amenity of the receiving rural-residential environment.</p> <p>In Council's view, the character and amenity impacts of the proposal as it stands, are significant.</p> <p>The evidence of Ian Munro (Urban Design) makes recommendations on modifications to the proposal that will mitigate character and amenity impacts, through a reallocation of densities and improved connectivity. I consider,</p>	<p>We have reviewed the evidence from Ian Munro and made several changes to the development that are in line with his recommendations. This is further covered in our Urban Design response (section 1.0 response to identified changes in Urban Design Evidence) and updated design guide controls and implementation. In conjunction with the urban design response and updated suite of plans, the potential character and amenity adverse impacts in relation to the development can be managed, in particular through the updated conditions of consent that require building line restrictions, buffers and no complaint covenants.</p>

	<p>subject to implementation of the modifications proposed in Ian Munro’s evidence, that the above adverse impacts can be managed appropriately, to be acceptable and of less significance.</p>	
5.3	<p>Impacts associated with the lack of integration of landuse with infrastructure</p> <p>The evidence of Susanne Kampshof and Santha Agas describe Ashbourne’s conflict with MPDC’s planned infrastructure delivery, the impact on MPDC’s funding through the long-term plan, and cost-recovery though development contributions.</p> <p>The evidence of Alastair Black describes the impact of Ashbourne on the wider road network, traffic safety/efficiency and amenity impacts on the residential street network, and the need for improved connectivity.</p> <p>Overcoming these impacts has significant cost implications and creates a risk that infrastructure costs will fall on the wider community. Even if the immediate direct costs are fully covered, there are indirect costs associated with inefficient infrastructure development, as alluded to in the evidence of Tim Heath.</p> <p>To mitigate the financial impact and potential risk to the community, MPDC is in discussion with the applicant regarding the terms of private developer agreements that will cover the funding of all direct costs associated with Ashbourne. Provided that agreement can be reached on an equitable funding model (including funding of additional road connections and improvements to the wider road network as discussed in the evidence of Alastair Black), the financial impact on MPDC and the wider community should be able to be managed to be acceptable and of less significance.</p>	<p>Our client is in the process of developing a PDA on infrastructure that will enable specific development contributions to be established to ensure ‘growth pays for growth’. The PDA will ensure in perpetuity how development costs will be equally distributed holistically across the development and paid back to Council through Development Contributions. This is a common approach Councils take to managing recovery of capital projects. It’s noted that Ashbourne would not have been considered in the LTP, hence the PDA is a suitable tool to substitute.</p> <p>The potential financial risks associated with Council is covered in point 6 of the Insight report dated 17th November 2025 as follows:</p> <p>We understand the importance of infrastructure planning, but we disagree that Ashbourne poses an undue financial risk to Council or ratepayers. Standard funding tools and prudent planning can fully address the infrastructure costs associated with the development:</p> <ul style="list-style-type: none"> • <i>Development Contributions (DCs) and Financial Contributions: Under existing frameworks, new developments are required to pay their fair share of infrastructure via DCs. Ashbourne’s developers will fund the infrastructure they necessitate – either directly constructing assets or through contributions. These mechanisms ensure that those who create the demand for new infrastructure bear the cost, rather than the general public. For a large, master-planned project like Ashbourne, this approach is well-defined and commonly used.</i> • <i>Targeted Rates or Private Infrastructure Agreements: Councils have the option to levy targeted rates on new development areas or enter into Private Developer Agreements (PDA) to formalise infrastructure funding and delivery. In fact, the applicant is already exploring a PDA with MPDC, which would lock in responsibilities for infrastructure provision and cost recovery. This gives Council certainty</i>

that the project will pay its way. Such agreements can also sequence infrastructure delivery in step with development staging, avoiding any premature investment or stranded assets.

- *Ring-fencing Growth Costs:* The key principle is that growth-related infrastructure costs can be ring-fenced to the development. There is no evidence that Ashbourne would require infrastructure that isn't scalable or that would impose unchecked costs on the community. On the contrary, because Ashbourne is a comprehensive plan, it allows for efficient infrastructure provision – e.g., trunk lines and roads can be sized for the development internally. Extending services to a new growth area is a normal council function and can be done without impacting existing users, provided costs are apportioned correctly.
- *Wastewater Treatment Plant Funding:* In addition, the applicant is entering into a PDA with MPDC that will include a material financial contribution toward the upgrade of the district's wastewater treatment plant. This provides direct funding support for a core council asset that benefits the wider district, not just the Ashbourne development. The project therefore improves the affordability and timing of critical infrastructure upgrades for MPDC, creating a wider regional benefit that extends beyond its direct development yield.
- *Council Experience and Long-Term Planning:* MPDC has experience managing growth infrastructure. (Our team's long involvement with Council's infrastructure strategy attests to this, as one of our economists has supported MPDC on funding policy for nearly 20 years.) Councils routinely plan for new subdivisions and have tools to ensure timing and funding align. If anything, a large, master-planned project like Ashbourne provides more certainty than piecemeal smaller developments – because Council can plan around one coordinated project rather than many sporadic ones. This coordination can actually reduce the risk of inefficient infrastructure spending.
- *Identification of Specific Risks:* Mr Heath's concern appears to be general. If there are specific, quantifiable infrastructure risks unique to this site (beyond the generic fact that new infrastructure is needed), they should be

	<p><i>clearly identified. To date, none have been substantiated. Absent specifics, it is hard to give weight to hypothetical risks. For example, if the worry is that Council might over-extend on capital works – that can be mitigated by staging and agreements. If the worry is operating costs – those are covered by rates from the new properties and economies of scale (more ratepayers). Without concrete examples, we conclude that Ashbourne’s infrastructure can be delivered in a financially sustainable manner.</i></p> <p>In summary, infrastructure funding is manageable with proper use of available tools. The FTAA’s Fast-track process does not bypass these funding arrangements; it simply accelerates the consenting. Council will still have control through conditions and agreements to ensure infrastructure is managed appropriately. We see no evidence that the project creates a systemic risk to Council’s finances or network planning. In fact, by delivering growth in a planned way, Ashbourne can complement the Council’s strategic planning – providing homes and infrastructure together in one package, rather than leaving Council to retrofit or chase unplanned growth.</p>
4.0	Proportionality assessment and recommendation
	<p>In my view and relying on the evidence of others as outlined above, the application has not demonstrated significant regional or national benefits, and poses potential significant impacts and risks associated with development suitability, and adverse impacts on the character and amenity of the receiving environment. It is not yet clear whether there are viable stormwater and private wastewater disposal solutions and an adequate/ reliable private potable water supply to serve the retirement living component, which (if no such solutions are available) are potentially significant adverse impacts.</p> <p>As matters stand, the result of MPDC’s comprehensive assessment is that under the FTAA’s section 85(3) proportionality test, the proposal’s adverse impacts substantially outweigh any regional or national benefits (even accounting for proposed mitigation measures).</p> <p>I refer to and support the findings of the technical memo prepared and submitted by Insight Economics dated 17th November 2025.</p> <p>This memo counters the evidence, justification and legitimacy of the MPDC arguments.</p> <p>I sight specifically the following from the report:</p> <p><i>We also point out that Mr Heath’s own consultancy, Property Economics, routinely presents gross construction and operational impacts without applying any displacement discount, even in markets with overlapping competing developments. We reviewed more than a dozen recent Property Economics assessments, including projects of similar scale and nature processed under the FTAA, and none quantify or deduct displacement effects. The approach now advocated in Mr Heath’s evidence is therefore</i></p>

inconsistent with the methodology his own firm applies when presenting benefits for other developments. Indeed, deducting displacement effects is not an industry standard, nor an established requirement under the FTAA, but rather a methodological position that is not applied consistently across Property Economics' own work.

That aside, even if there is a minor degree of substitution, the regional net effects remain strongly positive. To illustrate, we highlight several additional regional benefits that Ashbourne will provide:

- *A multi-year construction stimulus on a scale Matamata has not seen before. The project entails over \$500 million of investment, which translates into construction jobs, local business for suppliers, and increased consumer spending over the build-out period. This level of construction activity is unlikely to occur in the area without Ashbourne, and its timing (sooner rather than later) helps sustain the regional construction sector.*
- *Accelerated housing availability to address demand. By delivering housing now, the project helps alleviate pressure sooner. This has positive spillovers: preventing sharp price escalations that might occur if demand exceeds supply, and enabling employers in the region to attract workers (since housing will be available). Earlier availability of housing yields a time value of benefits – people can form households or move to the area sooner, contributing to the economy sooner.*
- *Diversification of housing typologies. Ashbourne's mix of housing types (from standalone homes to townhouses and apartments, plus retirement units) broadens the regional housing stock. This addresses niche demands (e.g., downsizers, small households) that are underserved, improving overall welfare. A more diverse housing supply also tends to improve market efficiency, as consumers can find products closer to their preferences.*
- *Expansion of the labour pool and economic base. By growing Matamata's population beyond the status quo trend, the project effectively adds human capital to the region.*

	<p><i>New residents (including commuters and remote workers) will contribute to both the Waikato and Bay of Plenty economies. A larger population also supports local businesses and services, creating a virtuous cycle of growth.</i></p> <ul style="list-style-type: none"> • <i>Renewable energy generation as a positive externality. The integrated solar farm (energy precinct) in Ashbourne provides additional clean electricity to the grid. This is a regional benefit in line with national sustainability goals – it improves energy security and reduces carbon emissions. The value of this environmental benefit accrues broadly and is not something that would happen on this site without the project (the status quo of farming contributes no such benefit).</i> • <i>Increased competition and choice in the development market, consistent with the NPS-UD's objectives. Ashbourne introduces a large new development led by an experienced developer, which will spur competitive outcomes – for example, other developers may respond by innovating or accelerating their projects. Consumers (home buyers and renters) benefit from more choices and potentially more competitive pricing region-wide, not just within Matamata.</i> <p><i>Collectively, these factors demonstrate that Ashbourne's benefits are truly net positive for the region. The scale and integration of the project create synergies and externalities that would not occur otherwise. Therefore, we are confident that the regional benefits clearly outweigh any localised adverse effects, satisfying the FTAA's requirement that projects have benefits proportionate to (or exceeding) their impacts.</i></p>
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2.0 Waikato Regional Council

2.1 Updated Reasons for Consent – Waikato Regional Council

WRC have supplied a set of reasons for consent for each of the three components of the Project, as summarised below. This Section is intended to supersede the reasons for consent set out in the following sections of the lodged substantive documentation:

- Volume 3 Assessment of Environmental Effects – Section 4.2
- Volume 4 Assessment of Environmental Effects – Section 4.2

- Volume 5 Assessment of Environmental Effects – Section 4.2

The applicant generally agrees with the reasons for consent set out by the WRC, however there are some proposed changes as they relate to the solar farms, and explanations of any differences are provided within the relevant section below.

2.1.1 Northern Solar Farm

Resource consents required under the Waikato Regional Plan (“WRP”) in accordance with Clause 5(1)(f) of Schedule 5 of the Act are as follows:

- The proposal includes drilling below the water table for dewatering spears that does not comply with Rule 3.8.4.6, however will comply with the Controlled Activity Standards, and is a Controlled activity under Rule 3.8.4.7.
- The proposed temporary groundwater take for construction is a Discretionary activity under Rule 3.3.4.24

These reasons for consent are proposed based on the comments provided by the WRC, however it is noted that as the consents for the northern and southern solar farms are proposed to be split, the northern solar farm does not require consent under Rule 4.2.9.3, as its catchment is understood to be less than 5ha.

2.1.2 Southern Solar Farm

Resource consents required under the Waikato Regional Plan (“WRP”) in accordance with Clause 5(1)(f) of Schedule 5 of the Act are as follows:

- The proposal includes drilling below the water table for dewatering spears that does not comply with Rule 3.8.4.6, however will comply with the Controlled Activity Standards, and is a Controlled activity under Rule 3.8.4.7.
- The proposed temporary groundwater take for construction is a Discretionary activity under Rule 3.3.4.24.
- The proposal includes the establishment of new culverts for the conveyance of stormwater in a catchment which exceeds 5ha but does not exceed 500ha. This is a Controlled activity as per Rule 4.2.9.3.

These reasons for consent are proposed based on the comments provided by the WRC.

2.1.3 Retirement Village

Resource consents required under the Waikato Regional Plan (“WRP”) in accordance with Clause 5(1)(f) of Schedule 5 of the Act are as follows:

- The proposed long-term groundwater take for irrigation and potable supply is a Discretionary activity under Rule 3.3.4.24.
- The proposed temporary groundwater takes for dust suppression and pump station wet well construction is a Discretionary activity under Rule 3.3.4.24.
- The proposed wastewater discharge does not comply with Rules 3.5.7.4 to 3.5.7.6 and is a Discretionary activity under Rule 3.5.7.7.
- The discharge of stormwater is not anticipated to comply with permitted activity standards and is a Discretionary activity under Rule 3.5.11.8.

- The proposal includes drilling below the water table for dewatering spears that does not comply with Rule 3.8.4.6, however will comply with the Controlled Activity Standards, and is a Controlled activity under Rule 3.8.4.7.
- Earthworks that do not comply with permitted activity standards are proposed and are a Discretionary activity under Rule 5.1.4.13.

These reasons for consent are proposed based on the comments provided by the WRC.

2.1.4 Residential Subdivision and Greenway

Resource consents required under the Waikato Regional Plan (“WRP”) in accordance with Clause 5(1)(f) of Schedule 5 of the Act are as follows:

- The proposed temporary groundwater dewatering for the construction of the greenway and wastewater wet well pumpstations and WW trenching is a Discretionary Activity under Rule 3.3.4.24.
- The construction of the greenway and wastewater pumpstations will result in a permanent diversion of groundwater and is a Discretionary Activity under Rule 3.3.4.24.
- The proposed discharge of stormwater into water and into land will not comply with Permitted or Controlled Activity Standards and is a **Discretionary Activity** under Rule 3.5.11.8. The proposal includes off stream damming that does not comply with Rule 3.6.4.4, however will comply with the Controlled Activity Standards, and is a **Controlled Activity** under Rule 3.6.4.9.
- The proposal requires the diversion of existing farm drains into the proposed Ashbourne Greenway that does not comply with Rule 3.6.4.8 and is a Discretionary Activity under Rule 3.6.4.13.
- The proposal includes drilling below the water table for dewatering spears that does not comply with Rule 3.8.4.6, however will comply with the Controlled Activity Standards, and is a Controlled Activity under Rule 3.8.4.7.
- The proposal includes an outlet structure from the Ashbourne Greenway to the Waitoa River. It is anticipated that this structure may be located on the bed of the Waitoa River and is a Discretionary Activity under Rule 4.2.4.4.
- The construction of the proposed outlet structure from the Ashbourne Greenway to the Waitoa River may require disturbance of the bed of the Waitoa River and is a Discretionary Activity under Rule 4.3.4.4.
- Earthworks including cleanfilling, sediment, and dust discharges that do not comply with permitted activity standards are proposed and are a Discretionary activity under Rule 5.1.4.15.

These reasons for consent are proposed based on the comments provided by the WRC.

2.2 Proposed Conditions of Consent – Waikato Regional Council

An updated suite of consent conditions is proposed based on the updated reasons for consent provided above. The proposed conditions of consent additionally incorporate all recommended conditions of consent outlined in the Waikato Regional Council s53 response.

2.3 National Environmental Standard for Freshwater 2020

The National Environmental Standards for Freshwater ('NES-F') sets standards to regulate activities that pose risks to the health of freshwater and freshwater ecosystems.

Consent is required under the NES-specifically in relation to Part 3: Standards for other activities that relate to freshwater – Subpart 1: Natural inland wetlands as vegetation clearance and earthworks are proposed within a 10m setback from the Oxbow Wetland as illustrated in Figure 1 below.

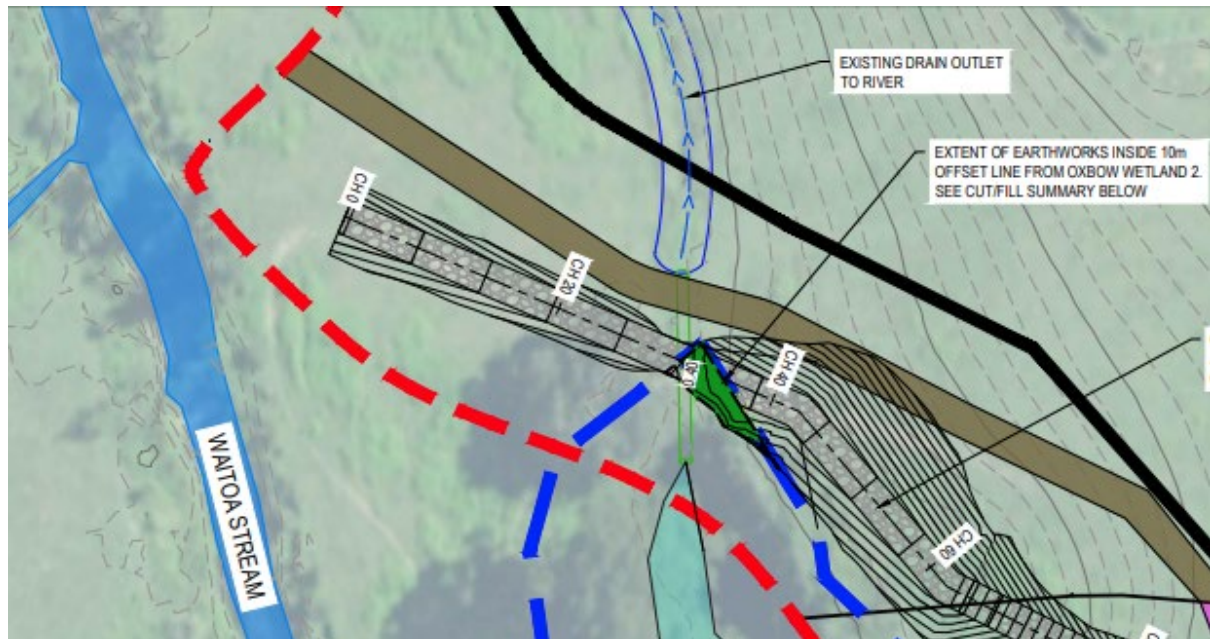


Figure 1: Extent of Earthworks within 10m of Natural Inland Wetland. Source: Maven Associates

Consent is therefore sought under Regulation 45C(1) and (2) as a **discretionary activity**.

Assessment of Effects

As summarised in the Ecological Memo entitled 's53 Response WRC and MPDC' included as **Attachment 26**, the Waitoa River is a permanent watercourse which has been heavily modified by channel straightening and agricultural practices which are reflected in the poor water quality, lack of riparian vegetation, and extensive bank erosion in sections. Oxbow Wetland 2 was found to contain indigenous fish, with the riparian vegetation surrounding the wetland being a mix of exotic and native tree cover.

Earthworks will be appropriately managed to ensure that potential effects of earthworks on water and habitat quality during construction will be minimised. Vegetation removal is limited to 21m² of riparian vegetation, with approximately 320m² of native revegetation along the eastern boundary of the existing riparian vegetation proposed as part of the construction of the Greenway. As a result, the loss of 21m² of vegetation is not anticipated to have any adverse effects on the ecosystem health of Oxbow Wetland 2.

As set out in the Ecological Memo at Attachment 26, the proposed earthworks and vegetation removal are not anticipated to have any significant adverse effects on ecosystem health, indigenous biodiversity, or hydrological function of Oxbow Wetland 2. Based on this assessment, it is considered that effects of the proposed earthworks and vegetation clearance is less than minor.

Objectives and Policies of the NPS-FM

The National Policy Statement for Freshwater Management 2020 ('**NPS-FM**') provides local authorities with updated direction on how they should manage freshwater under the RMA.

An objectives and policies assessment of the NPS-FM was provided with the substantive lodgement as **Appendix 5N**. This assessment is considered to remain relevant and is relied upon to support the application.