

**BEFORE AN EXPERT PANEL**

**IN THE MATTER** of the Fast-track Approvals Act 2024 (the **FTAA**)

**AND**

**IN THE MATTER** of Ashbourne (FTAA-2509-1087)

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**MEMORANDUM OF COUNSEL FOR MATAMATA-PIAKO DISTRICT COUNCIL**  
**Dated: 27 March 2026**

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LAWYERS

**MAY IT PLEASE THE PANEL**

1. This memorandum is filed on behalf of Matamata-Piako District Council (**MPDC**) to seek clarification in relation to Minute 27.
2. While Minute 27 references various conditions and modifications, it does not clarify how the larger lot size requirement should be applied along the boundaries adjoining Rural and Rural-Residential Zoning.
3. MPDC understands that the Applicant has interpreted the draft decision to exclude the requirement for larger lots where the boundary adjoins land controlled by the Applicant, notwithstanding that the land has a Rural zoning. For an illustration of the Applicant's interpretation, see the second column of the table in **Annexure A**.
4. The relevant part of paragraph [448] of the draft decision states "... *in respect of minimum lot sizes for those lots abutting the external boundaries (other than those that have a residential zoning at the end of Peakedale Drive) ...*"
5. Our reading of paragraph [448] is that it identifies only one exclusion, namely the lots with residential zoning at the end of Peakedale Drive. As the Panel's wording lists only one exclusion, the Applicant's interpretation is not clearly supported. MPDC's interpretation is that the Panel intends for the larger lot size to apply to all boundaries with Rural and Rural Residential Zoning. For an illustration of MPDC's interpretation, see the first column of the table in **Annexure A**.
6. MPDC considers that the application of the larger lot sizes along all Rural and Rural-Residential interfaces, including where the adjoining land remains under the Applicant's control, serves as an important and enduring mitigation function. Larger lots provide a meaningful spatial buffer that reduces the potential for reverse sensitivity effects arising from established or future rural activities, thereby supporting the long term compatibility between residential development and adjoining rural land uses.
7. It would be beneficial to receive clarification from the Panel regarding this. Accordingly, MPDC respectfully requests confirmation of the following:

- a. Whether the larger lot size requirement is intended to apply to all boundaries with rural and rural residential zoning, including those abutting land controlled by the Applicant; and
- b. Whether the exclusion of the lots with residential zoning at the end of Peakedale Drive is the only exception to this requirement.

**DATED** the 27<sup>th</sup> day of March 2026



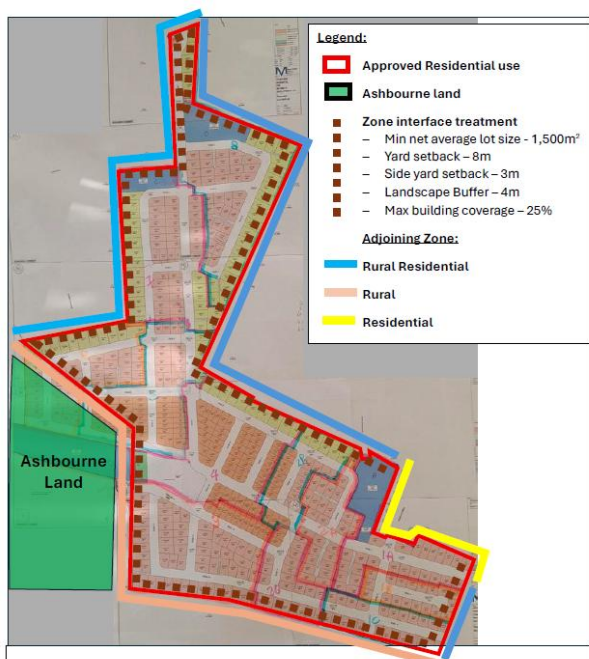
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**Andrew Green / Michelle Hooper**

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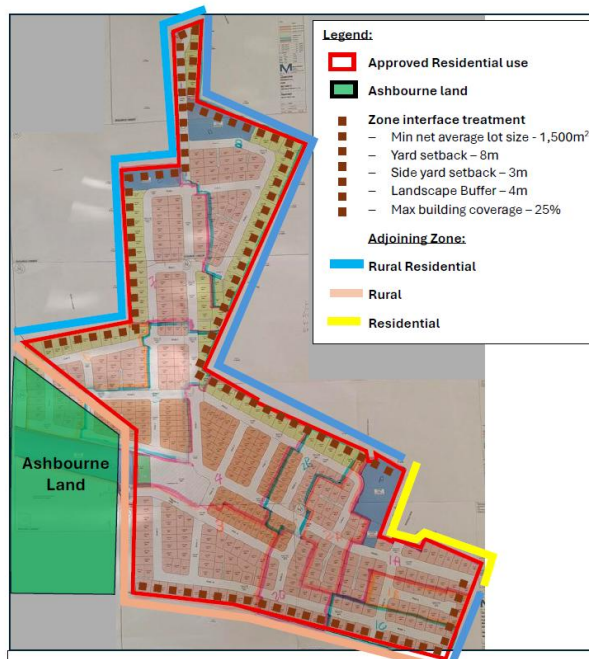
Annexure A

MPDC's Interpretation



ASHBOURNE DRAFT DECISION – MPDC INTERPRETATION

The Applicant's Interpretation



ASHBOURNE DRAFT DECISION – ASHBOURNE INTERPRETATION