

Our Ref: 101.2025.13180 & 102.2025.13180
Enquiries to: **Sam Vautier**

11 November 2025

Application Lead: Fast Track Applications
Environmental Protection Agency
Private Bag 63002
Wellington
6140

Attention: Nicky Sedgley

Via Email: substantive@fasttrack.govt.nz

Tēnā koe Nicky,

FTAA-2507-1087: ASHBOURNE DEVELOPMENT, MATAMATA – COMMENTS OF THE MATAMATA-PIAKO DISTRICT COUNCIL ON THE SUBSTANTIVE APPLICATION

I refer to Minute 1 of the Expert Panel dated 13 October 2025.

On behalf of the Matamata-Piako District Council (Council), and in accordance with Section 53(2)(a) of the Fast-track Approvals Act 2024 I hereby offer the following comments on the substantive application for the proposed Ashbourne development in Matamata:

1. Introduction

Matamata-Piako has a relatively small population base of some 39,000 residents (June 2024), projected to increase by approximately 10,000 people to approximately 49,000 over the next thirty years (high-growth projection)¹.

While predominantly rural, the District has a strong urban-base focussed on the three main towns of Morrinsville, Matamata and Te Aroha that jointly accommodate more than 60% of the District's residents. Morrinsville (population 9,600) and Matamata (population 9,480) are the two largest towns, with Te Aroha (population 4,720) having a smaller population.

All three towns have shown stable growth of approximately 2% p.a. over the years, spurred on by the District's proximity to the main centres of Auckland, Hamilton and Tauranga, and the unique "town and country" lifestyle that it offers. With the trend towards further urbanisation of the District, the towns are predicted to continue to grow into the future with, by 2054, Morrinsville expected to have a population of 14,000, Matamata 12,640, and Te Aroha 6,090 (see table below).

Matamata-Piako Urban Growth Estimate²

Town	Population Estimate		Increase in population
	2024	2054	
Morrinsville	9,600	14,000	4,400
Matamata	9,480	12,640	3,160
Te Aroha	4,720	6,090	1,370
Total	23,800	32,730	8,930

¹ Matamata-Piako Residential Capacity Assessment, Property Economics, October 2025.

² Matamata-Piako Residential Capacity Assessment, Property Economics, October 2025.

The Council, and the community in general, are supportive of urban growth and acknowledge the benefits that it brings in terms of stimulating and diversifying the local economy, addition of job opportunities, and funding for improved community facilities.

The District, through its strategic urban planning and infrastructure delivery programme, is actively planning for the growth to occur in a sustainable manner and has recently joined the Future Proof partnership to leverage sub-regional growth initiatives. The District's urban growth planning acknowledges the Future Proof growth targets of consolidating urban development within the District's Urban Enablement Areas and striving to intensify existing urban areas through infill development³.

In the context of the above, the Council views Ashbourne's proposal as a bold initiative and, given the scale of the proposed development, a significant opportunity. The Council appreciates the trust that the Ashbourne developers have placed in the future of Matamata and commends them for their interest in becoming part of Matamata's future development.

2. Comments

The Council acknowledges the extensive engagement of the Ashbourne team with MPDC staff, from the inception of the project, through to its acceptance under the FTAA. Throughout the engagement, the Council has shown an interest in advancing the project, provided that significant concerns could be resolved.

These concerns were formalised in the Council's response to the EPA's invitation to comment on the referral application. In summary, the Council noted that it had significant concerns that needed to be resolved as the project moved forward, regarding:

- the site's development suitability constraints, given known geotechnical and hydrological conditions, requiring the applicant to robustly demonstrate that the constraints could be overcome in the engineering design and that natural hazard risks could be avoided;
- the proposal's conflict with MPDC's strategic growth model, and the impact that that would have on the Council's integrated planning and infrastructure delivery/ funding model;
- financial risk to the wider community and, given the "out-of-zone" locality and lack of planned/ funded infrastructure, the need to robustly demonstrate that any cost implications attributed to the development, will be funded in full by the applicant on the Council's unwavering principle that "growth pays for growth";
- adverse amenity and character effects on the Eldonwood South area of Matamata;
- Ashbourne's growth aspirations that are beyond the limits of MPDC's estimates, and the need to demonstrate that the benefits claimed could reasonably be expected to eventuate, rather than to result in a mere relocation of growth from a planned to an unplanned location.

Given Council's interest in what it sees as a significant development opportunity for Matamata, MPDC invested sizeable resources to "flesh out" its concerns and gauge whether feasible solutions could be found to demonstrate that the project is "fit for purpose" and will benefit the community. To this end MPDC engaged a team of in-house and external experts to advise the Council.

The evidence of the experts is attached to this letter and forms part of the Council's comments under s53(2)(a) FTAA. In summary, the advice from the experts on the application as it stands at this time, is:

- **Development suitability (Tony Cowbourne)** – there are significant remaining concerns regarding the suitability of the site for residential and retirement living, adverse impacts of large-scale dewatering of the site that have not yet been assessed, and potential unmitigated hazard risks.

³ See Future Proof Development Strategy, Part C, 2024 at: <https://www.futureproof.org.nz/our-strategic-direction/>

- **Economic impact assessment (Tim Heath)** – the Council has provided sufficient zoned residential capacity to meet expected demand. Ashbourne is unlikely to create new residential demand and will primarily result in a redistribution/ dispersal of growth already planned for in Matamata.
- **Stormwater disposal (Bronwyn Rhynd)** – there are remaining concerns regarding the resilience of the proposed stormwater system and the outlet to the Waitoa River.
- **National Policy Statement for Highly Productive Land (Duncan Walker)** – the Ashbourne project does not fully satisfy the relevant provisions of the NPS-HPL as they relate to subdivision and development of highly productive land. While the proposed solar farm component may align with the intent of the NPS-HPL, the remainder of the proposed development does not demonstrate compliance with Clauses 3.8, 3.9 or 3.10.
- **Transportation (Alastair Black)** – outlines the need for better integration of Ashbourne with the wider road network, need to improve connectivity, potential traffic increase on nearby local roads, and mitigation measures required to manage adverse transportation effects.
- **Private servicing of the retirement village component (John Sternberg)** – given groundwater conditions, the applicant has not demonstrated that the proposed private onsite wastewater disposal system is feasible. There are remaining questions regarding the adequacy of the private bore water supply and the potential for contamination of the water supply from the onsite wastewater disposal system.
- **Public water and wastewater to the residential component (Santha Agas)** – outlines significant unplanned reticulation upgrades required to service Ashbourne.
- **Infrastructure funding (Susanne Kampshof)** – outlines the high-level principles that will need to guide the terms of the Private Developer Agreement and that are currently under negotiation with the Ashbourne developers.
- **Acoustics (Neil Savory)** – recommends changes to the proposed consent conditions, including reference to the updated noise standards (NZS6801:2008, NZS6802:2008 and NZS6803:1999) which will change the LA₁₀ descriptor to a LA_{EQ} descriptor.
- **Urban design (Ian Munro)** – insufficient reflection of urban design outcomes relating to connectivity and compatible density interface, and adverse impacts on rural and rural-residential zoned land.
- **Planning (Marius Rademeyer)** – provides an overall assessment under the FTAA, with the conclusion reached that the proposal's adverse impacts substantially outweigh any regional or national benefits (even accounting for proposed mitigation measures).

Based on the advice of its experts, the Council is unable to support the Ashbourne proposal in its current form. The Council notes that many of the issues raised by its experts are echoed in the comments from affected neighbours.

3. Conclusion

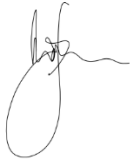
The Council remains committed to continue to work with the Ashbourne team in the spirit of constructive engagement and collaboration, through the FTAA statutory process.

The Council wishes to encourage the Ashbourne team to continue to work towards resolving the issues outlined by its experts. In particular, the Council invites the Ashbourne team to give consideration to the recommendations in Ian Munro's evidence which, if implemented, could potentially result in a "win-win" for all parties.

Ultimately, if the application is unsuccessful, the Council suggests that the Ashbourne team investigates the feasibility of progressing the project through the RMA private plan change pathway, which the Council regards as the preferred, and appropriate planning mechanism to advance an “out-of-zone” development of this scale and nature.

Ngā mihi nui,

Issued under delegation from the Matamata-Piako District Council; by:



Manaia Te Wiata
Chief Executive Officer
Matamata-Piako District Council



Ally van Kuijk
Group Manager – Growth and Regulation
Matamata-Piako District Council

List of Annexures to this letter:

Annexure A: Legal Memorandum (Brookfields)

Annexure B: Planning Evidence (Marius Rademeyer)

Annexure C: Urban Design Evidence (Ian Munro)

Annexure D: Economic Impact and Residential Capacity Evidence (Tim Heath)

Annexure E: Geotechnical Evidence (Tony Cowbourne)

Annexure F: NPS-HPL Evidence (Duncan Walker)

Annexure G: Transportation Evidence (Alastair Black)

Annexure H: Stormwater and Flooding Evidence (Bronwyn Rhynd)

Annexure I: Public Water and Wastewater Evidence (Santha Agas)

Annexure J: Private Services (Retirement Village) Evidence (John Sternberg)

Annexure K: Infrastructure Funding Evidence (Susanne Kampshof)

Annexure L: Acoustic Evidence (Neil Savory)