

Your Comment on the Ashbourne substantive application

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz.

1. Contact Details	
Please ensure that you have authority to comment on the application on behalf of those named on this form.	
Organisation name (if relevant)	
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Email (a valid email address enables us to communicate efficiently with you)	[REDACTED]

2. We will email you draft conditions of consent for your comment			
<input checked="" type="checkbox"/> Yes	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct

Please provide your comments below, include additional pages as needed.

Please see attached document/submission

Thank you for your comments

**ID & CE Hayes submission to the Expert Panel re
The Ashbourne Development
located in Matamata
dated: 3 Nov 2025**

Context:

Matamata is a small rural community with a June 2024 population of just 9,540. The proposed "Ashbourne" project is ill conceived, primarily because it puts the cart before the horse. The project assumes too many things that promote the developer at the expense of the Matamata community. There is no material benefit/advantage to Matamata; all the upside is with the developer. This project is premature and is many decades ahead of its time. This project could add about 2,400 extra people or increase the Matamata population by 25% without the required supporting infrastructure and services in place. It is the same equivalent of adding 430,000 people into Auckland and making provision for 108,000 extra sections in one subdivision. The impact on Matamata will be colossal and has been totally underestimated and underplayed. Matamata will struggle to afford the future necessary infrastructure because of its lower economic capacity and low population base. Matamata simply does not have the financial resource to integrate "Ashbourne" into the existing Matamata community. All the long term infrastructure costs will be carried by Matamata ratepayers (only approx 3,600). Matamata does not have the economies of scale. The wellbeing of the community has not been considered at all. The developer and his advisors/supporters/advocates are using the Fast Track process as a means of grabbing prime agricultural land, which is not the intent of the Fast Track process. If it is, then the process is badly flawed, particularly when our elected representatives are sidelined (MPDC) and the residents have a very reduced influence in the decision making process. This project is estimated to take many years to be fully completed, then why is it necessary to use the Fast Track legislation to achieve this. The Wellington Regional Stadium will fit into "Ashbourne" no fewer than 26 times. That's how big it is.

Specific "Ashbourne" issues:

- **Storm Water/Flooding:**

Matamata-Piako district is flat, and is prone to high saturations of water and very high water tables. Matamata is only about 63m above sea level 76km away making the gradient almost flat. The water catchment of this development will manifest itself further down stream, by overwhelming natural drains, ponds, streams, rivers and the protected Kopuatai Wetland with excess water causing severe damage in a greater area. Given that the MPDC has been sidelined in this process then this adds greater risk to the "Ashbourne" development and to the greater Matamata township and the greater catchment area. On average we receive about 1.3 metres of rain a year and this year (2025) we could very well exceed that figure. If you consider all the new "hard" areas that will be created at "Ashbourne", particularly with smaller sections, then the planned storm water systems may not be adequate and flash flooding could prevail. "Ashbourne's" total catchment area of 125 ha (309 acres) will capture approximately 1.2 to 1.3 billion cubic metres of run-off water to be disposed of annually. That amount of water would run the Matahina Dam on its minimum flow for about a year. That's an enormous amount of water where nature is playing less of a part. Recent river works ensures a 50-year protection from Piako River flooding with 300mm freeboard. The 300mm freeboard is no insurance and provides little peace of mind if "Ashbourne" was added into the mix.

- **Erosion protection:**

Exotic forest plantations cover approximately 1,936 hectares (4,800 acres) of the Matamata-Piako district. These forests are typically found in the Kaimai foothills, on steeper land not suitable for intensive dairy farming. What happens when these private plantations mature and are milled for timber? What steps are going to be taken to mitigate erosion once top covers of vegetation and soil have been eroded? More importantly what effect will this cleared land and "Ashbourne" collectively have on the total Matamata-Piako catchment area and its infrastructure.

- **Ground Testing:**

Have sufficient geo-tech test sites been drilled in line with NZS 4404:2010? Has enough data sampling been collected from test sites to provide a high integrity profile of all soil and rock types and conditions over all the proposed 125ha. Has the data been collected over a full year to ascertain seasonal variances and occurring changes? Do the test results address specific challenges from soft, saturated soils and high groundwater? We would draw the conclusion that the more data collected the better results and the better the understanding and therefore the better the decisions. Drilling just a few test sites will not be sufficient given the soil types that exist. Due to the high risks involved, this type of land generally requires a more extensive and rigorous investigation. Has the total site been scanned for possible sink holes? We have only seen one test bore installed. Has natural springs and water courses been clearly identified? Has a seismic analysis been completed and is liquefaction risk been assessed on the designated land? Are the engineers providing a professional written guarantee/s? To date no test pits have been excavated to visually inspect and analyse shallow soil layers.

- **Ground water/The aquifer:**
The affect of the above could be severely detrimental to the towns water supply and the level of the water table and aquifer.
- **Waste Water/ Sewage disposal:**
There is no spare capacity in the current waste treatment infrastructure. There is an upgrade imminent, but this upgrade does not take into account "Ashbourne" incremental volumes. So, who is funding the next upgrade?
- **Pathways and roading:**
The existing roads are not designed to carry 20-40 tonne trucks and associated heavy machinery over a prolonged period of time. The residents of the intended access roading are going to be subject to ongoing heavy truck/machinery movements over a very long period of time. This is unacceptable. There appears to be a complete lack of logistical planning and endeavour that enables this work to even begin. A completely separate roading network for this large scale enterprise is required. To rely on existing streets is simply the developer taking short cuts. Who will pay when the streets breaks up and require major repairs? Jellico Road is breaking up as we write. If this project is to go ahead, then a more direct access route should be mandatory before any development is commenced. "Ashbourne" is only 1.3km away from the Matamata College. This school has a roll of over 800 pupils. Students walk to school via the surrounding streets earmarked for "Ashbourne", so safety is paramount. A student has already been tragically killed this year by a train.
- **Loss of Amenity/Visual Pollution:**
Community wellbeing is paramount. To convert beautiful, pristine country side vistas into an architectural nightmare (i.e. a sea of roofs) is unconscionable. If the UHI issue has been ignored and left out of planning process, then there has been a complete lack of building design, aesthetics retention and landscape enhancement leaving the project void of any critical analysis and sincerity.
- **Mitigation planning:**
In the "Ashbourne" proposal, there is no mention of any sound modern management and business systems/practices to ensure the community, the environment and the construction are managed and lead to the highest possible world class standards using world class systems and processes. What happens if these processes are not nationally or internationally recognised?
- **Solar farms:**
There is no recognition regarding the affect sun strike and glare will have on aviation in terms of aircrew and passenger safety, nor on the affect solar glare/panels have on radar. Parachute and gliding operations are carried out from this airport. This could affect both local operators out of our Matamata Aerodrome and Air NZ flight paths over/near Matamata. The severe glare from solar panels has not been acknowledged nor has the impact of glare in a residential area been assessed. There is no mention of how the power is to be reticulated. The nearest substation is the Hinuera Substation which is located 14kms to the south of Matamata. To connect to the national grid will pylons/power poles need to be erected through to the Hinuera Substation? Who carries this major cost which will be in the millions of dollars?
There is no ownership taken by the developer on the end of life (20-30 years) of each of the solar farms. The disposal of decommissioned solar panels (a serious global issue) has not been covered in this proposal. The developer does not specify what type of solar panels will be used. Are they fixed, trackable? Why is there such a need for two solar farms? Why can't solar panels be placed on house roofs as part of the property covenants. Solar farms should ideally incorporate battery storage systems. This is because solar energy generation is intermittent, relying on sunlight, and battery storage allows for the capture and utilisation of excess energy produced during peak sunlight hours for use during periods of low sunlight or high demand. This improves grid stability, reduces reliance on fossil fuels, and can lower energy costs. Unless battery storage is a key part of this energy generation platform then its reason for being is highly questionable, not to mention its efficiency. Do these two solar farms improve the reliability of power supply to Matamata and does it fit with a national energy strategy. It is possible that connection from these two sites to the National Grid may not be feasible and what happens if a "Connection Contract" does not materialise? As far as placement and location goes, the three examples below are not integrated into the residential part of the town and are situated well away.
 1. Tauhei solar farm is approx 10-15km away from the Te Aroha (pop. 4,750) township on rural land.
 2. Rangitaiki Solar Farm is approx 2-5km away from Edgecumbe (pop. 1,900) township on rural land.
 3. Helios Solar Farm is located 1.3 km away from Ongaonga (pop. 150)

Others that have been constructed are the same and are placed in rural land well away from the nearest township. So, what makes this one so special that it can be placed in very close proximity to the residential area? They should be located as close as possible to the nearest substation to keep costs down.

The two solar farms are large rainwater catchment areas. These two solar farms may have been included to appease the environmental/green vote to get "Ashbourne" over the line. If this is true then it is a very poor trade off that only serves the developer. The current proposal of two solar farms does not have any critical mass to bring any meaningful, significant benefits to Matamata township, Matamata-Piako region or New Zealand as a whole. The land is more valuable remaining as prime agricultural land. Clearly the developer will on sell this land to an interested buyer, but it may not end up as a solar farm. The inclusion of the solar farm/s is only to get the residential development of the ground, nothing more.

- **Loss in value of existing housing/sections in Matamata:**

The very thing that the MPDC, WRC and Government (via GST) would not like to see is a gradual reduction in rateable values and consequently a lower rates/tax collection. When this happens MPDC is forced to scale back its planned work programs or increase debt or both. Introducing high density housing is a catalyst for house value reduction and if Kainga-Ora is in the mix this will exacerbate the issue to a much larger scale. Those who are seeking Government Housing assistance need to be where the chances of employment are many times greater (larger populations e.g. Hamilton) than what Matamata can ever provide/offer long term. This could be construed as another lever to get this project over the line.

- **Oversupply of residential sections:**

Matamata **does not** have a section shortage issue. Nor does it have a housing shortage. It has the opposite. Testament to this is the many sections that are still available today that remain vacant. Some of these sections have been available for a number of years.

These vacant sections are located in the following developments.

1. Pippins
2. Peakedale
3. Ballina/Calcutta Farms – this development is a work in progress due to the National Policy Statement on Highly Productive Land (NPS/HPL).
4. Ancroft
5. Maea Fields
6. Highgrove
7. Eldenwood
8. Matamata Country Club (Retirement Village currently under construction)

These do not include subdivisions of larger individual sections within the township or rural life style blocks scattered throughout the district.

- **Increased infrastructure costs for ratepayers:**

Rate payers will be left to carry the cost burden of this venture. The incremental costs will be applied to a small number, about 3,600 Matamata ratepayers. If this were to transpire then Matamata will become a socio-economic disaster. The risk is too high and will prove the venture is unsustainable. Rate payers inside and outside of Matamata will be up in arms if they are asked to pay for this cost burden.

- **Potentially decades of construction noise/dust pollution:**

There has been no mention of noise or dust control management and no mention of start times and finish times to mitigate this. Construction timetables are seasonal and weather dependent so history tells us that these projects nearly always overshoot the time lines and overshoot the final cost. Matamata's abundant rainfall could interrupt completion times by years. The affected residents are going to be subject to ongoing noise and dust pollution for potentially many years. For those of us who are very close to this pollution it is distressing especially when we had only been in possession of our new house for two weeks when this bombshell was dropped. Had this information been available to us under the usual council controlled process, then we would not have made the decision to impact our lives in this very stressful way. The secrecy surrounding this process is immoral. We did our due diligence unaware that the true facts were been withheld.

- **Loss of highly productive agricultural land:**

Many SME's support the local agricultural industries, in terms of product and services. With such a loss of high value/productive agricultural land, these SME's need to prepare for de-growth in their respective operations. That is in direct conflict of the Governments Growth Strategy.

The district's highly productive land is subject to the National Policy Statement for Highly Productive Land, which aims to protect the most fertile soils from urban and rural residential development. So, does "Ashbourne" make the NPS-HPL null and void? High productive land is far more beneficial to Matamata (and the wider economy) than relegating this land to a "non-productive" status. (From www.dairynz.co.nz) The Waikato region has the largest share of the national cow population (about 22.9%). Matamata-Piako with 843 herds (8.0%)

"Ashbourne" effectively removes;

1. the equivalent of 360 cows from the milk production cycle. That is the equivalent of one average sized dairy unit. Waikato is ranked third highest in cows per hectare at 2.87.

2. the equivalent of 140,000 (+-) milk solids from the production cycle per annum. At current payout rates that is NZ\$1.4 million taken out of the local economy per year, every year. That, is not adding value or contributing to growth.
3. the ability to produce large volumes of stock feed such as hay, silage etc. More pressure is placed on existing farms to produce more and incurring increased costs as a result.

The downstream effects could manifest itself in unemployment and business closures/rationalisation/relocation elsewhere in the supply chain. The change from agriculture to housing becomes irreversible. The loss of prime agricultural land will pressure remaining farms to intensify production further, which risks degrading soil health and water quality, creating greater issues in the near future.

"Ashbourne" could be a catalyst for Open Country (New Zealand's largest independent dairy processor) to review/scale down its investment program at its Waharoa site. That is not growth. "Ashbourne" may not be defined as Highly Productive Land (HPL) but it is certainly prime agricultural land.

The conversion from agricultural land into housing raises the risk of creating a large urban heat island (UHI). This can produce a new microclimate with much warmer temperatures. This may have a detrimental effect on the wider community and contribute to global warming. No mention has been made of how to mitigate this issue.

MPDC say that; *"Changes to the climate mean our weather is becoming more unpredictable and more extreme. In the years ahead, people in Matamata-Piako are likely to face increasingly frequent and severe storms and floods, and at the other extreme, more hot days, water shortages and risk of drought and wildfire. These changes will have impacts for people across our district, and on our ability to provide services to our communities"*.

- **Employment:**

Matamata is a rural agricultural town based on stud farming, horse breeding, cropping, sheep, cattle and dairying as its main industry base. It is not an urban centric town. It is a rural centric town. The town has a number of SME's, the biggest being J Swap, who employ about 650 people nationwide. J Swap are actively involved in civil construction, aggregate supply, bulk cartage, storage and distribution, traffic management, stock feed and forestry construction. This ebbs and flows according to the economic cycle that prevails at the time. There is no other large scale employer, offering employment to the scale that will be required to support people who would live in "Ashbourne", **it doesn't exist**. People who choose to reside in the "Ashbourne" development will either be retired, or will possibly have to commute as far away as Tauranga, Te Aroha, Thames, Morrinsville, Cambridge and Hamilton for employment. We note that the proposal touches on employment of several hundred workers during the construction phase. This maybe true but what is equally true is most of these employees may be from out of town and will not contribute to the Matamata economy. "Ashbourne" does not bring any sustainable strategic increased employment opportunities on a long term basis. Once the construction is complete, we are back to the status quo. Much like the big dam projects of the 1950's and 1960's, Turangi and Mangakino as examples. In 44 years Matamata's population has not doubled and still remains at below 10,000. The long term, sustainable employment issue has not been addressed.

- **Existing infrastructure:**

Many assets are near there end of life and/or at full capacity and require substantial new funding to either renew or upgrade. This is required now without "Ashbourne". None of it will happen without Central Government support.

Schools:

1. Primary school
2. Intermediate school
3. High school

are all at full or near full capacity.

4. Sewage treatment plant is at full capacity with in upgrade pending, without "Ashbourne" in the mix.
5. Matamata Medical Centre have 16,500 registered patients on their roll. "Ashbourne" could add another 2,400 to that roll, an increase of 15%, with no planned material increase in local doctors and nurses, and associated support staff which are all in short supply.
6. Police will require additional support with a greater population to maintain law and order.
7. Local and Waikato Hospitals will require additional assets and medical support.
8. Fire Brigade will require additional resources like equipment and personnel.
9. St Johns will require additional resources, like vehicles, equipment and personnel.
10. Local recycling centre will need to handle increasing volumes of waste.

- **High density housing:**

This is included in the "Ashbourne" proposal. It proposes that a significant number of units be constructed with "zero" garage facilities. This particular concept of high density units is flawed and I am surprised that it is even worth consideration. This type of living arrangement has only downsides to it. If no garages are planned (it's happened in Hamilton, and Rotorua) then vehicles will be parked out on the street. If the owner has his/her own vehicle, a work vehicle, and a recreational vehicle (boat/caravan), all will be parked on the

street. The other side of the street will be replicated and then you have a recipe for a disaster. Any emergency vehicles like, St Johns, Police, Fire, will not be able to reach the incident because the road is virtually blocked. In fact a helicopter may be of no use.

The other issue/s around high density units is the socio-economic impacts of people living in cramped, dangerous living conditions. High density housing, by definition, means multi storey accommodation. Has any provision been made for new parkland and playgrounds? This compensates for smaller sections and many people living on one section.

The population density increases significantly from 995 people per km² to 1101 people per km², an 11% increase. That is 106 extra people per km² placing extra strain on resources and that is way beyond what our community can absorb and sustain.

- **Commercial Precinct:**

This is the genesis of what has become failed CBD's in cities like Hamilton, Tauranga, Rotorua and Whakatane where these concepts have sucked the financial lifeblood out of businesses located in the CBD by removing foot traffic. Councils in these cities are spending more and more ratepayer money in an attempt to "revitalise" their respective CBD's to no avail. Matamata has already got a large retail/commercial/industrial precinct. Matamata is too small for this to be adopted. This proposed commercial area will not attract new business or employment to the scale required. It will simply take a couple of businesses from down town and relocate them, leaving empty premises in town unable to be filled. The first thing we need is a strategic sustainable solution, the last thing we need in another cafe and hairdresser. This could be seen as another lever to get this project "over the line".

- **Wildlife/Habitat/Ecosystems:**

Many significant and magnificent trees (many are protected under the Matamata-Piako District Plan) and hedge rows will fall to the axe and will disappear forever. Many plants, animals, birds, fish in our region are endangered. If these were to disappear then that is on all for us.

No mention has been made on how the developer plans to preserve the natural wildlife and its habitat to ensure that this precious treasure sustainably survives well into the next millennium. What is proposed does not go far enough and borders on being criminally negligent. In respect of the large trees, has an audit been carried out on the trees to ascertain their significance, age, condition and long term survival rate? The if developer can't preserve a few of these magnificent trees then the profit margins must be very thin.

- **Add value to Matamata:**

On considering all the issues that are clearly obvious I would have to conclude there is no material upside for Matamata. All that "Ashbourne" development has done, is highlight how fragile our environment and our community is, and how our community assets require urgent upgrade and renewal. A very high percentage of building materials/services will come from out of town, so Matamata businesses will not gain any material advantage from this development. They are too small with no economies of scale and no leverage to be of benefit. This does not add value or grow Matamata.

- **Socio-economic justification:**

Where is the rationale for "Ashbourne" by evaluating its social and economic benefits against its costs and potential drawbacks. It has not been made public if it indeed exists. Surely the developer would have carried out this analysis. To date there are three parts missing from the proposal.

1. social impacts
2. environmental impacts
3. financial impacts

Because there are significant and serious shortfalls in the local infrastructure, this project, if it gets approved, will actually take away peoples basic human rights to:

1. health
2. education
3. employment
4. safety
5. movement

- **What's Next:**

If "Ashbourne" is given approval to go ahead, this sets a precedent. Does this mean that any future developments must have

1. access to large areas of prime agricultural land
2. solar farm/s.
3. retirement village/s.
4. commercial area/s.
5. high density housing allocation/s.
6. no consideration to financing much needed infrastructure.
7. no sustainable strategic benefits.

just to get the project over the line?

Summary:

There is no material benefit to Matamata, it adds costs but not value. The long term costs lands on the rate payer. The bias supporting the project from various commentators has not gone unnoticed. Getting this legally and by definition over the line is a very far cry from getting it over the line morally. I am alarmed at how the developer has used the Fast Track vehicle to acquire a sizeable chunk of land for development, circumventing the "normal" council lead processes. If he did, there could be a high chance it would not pass the threshold. There appears to be a complete lack of critical thinking in this proposal. No guarantees have been offered to ensure the developer will not simply on-sell all or part to new owner/s, and simply clip the ticket, ultimately leaving a wasteland.

The woeful input from so-called expert consultants have offered nothing but platitudes and vagueness to ensure their impunity. Their responses to date have been ad-hoc and reactive. They have been economic with the facts and disclosures, and simply have not done their analytics to the required depth or standard. They have treated this proposal as a purely "transactional" exercise. This has to pass a very high bar which must satisfy Central Government and the Expert Panel. But just as important it must pass a very high bar with the local Matamata community. The developer has included two solar farms and an allocation of high density housing, both of which could be construed as a "sweetener" to the authorities, to get this project over the line. No doubt similar tactics have been used elsewhere. Because of the size and scale of "Ashbourne" where is the community socio-economic impact statement that must accompany this proposal? It is completely absent.

All the participants in this process will get paid handsomely for the work they do, but the wider Matamata-Piako community will have to bear the cost consequences of this proposal for generations to come.

This is a wake up call for all involved to see if the courage exists to stop this venture in its tracks.

I hope the Expert Panel has the courage, experience and wisdom, but more importantly the foresight, to reject this application. Matamata will be the poorer if it goes ahead. It adds nothing to New Zealand's fiscal position with the rest of the world.

As a consequence, we do not support the "Ashbourne" development.

Thank you for your time and for reading our submission.

Regards

Ian and Cheri Hayes

