

## Executive Summary

---

While we have endeavoured to respond to all comments raised by affected landowners, due to the volume of comments received and the timeframes available under the FTAA, some comments have been grouped by theme below.

Where comments were received from an entity representing a group of landowners or where issues raised in a comment are specific to that property only, a specific response has been provided. The remainder of comments have been grouped into the following themes below:

- Solar Farms – Section 14.0
- Unsuitability of Land – Groundwater, Liquefaction, and Flooding – Section 15.0
- Loss of Productive Land – Section 16.0
- Lack of Economic Significance and Housing Demand – Section 17.0
- Construction Effects – Section 18.0
- Traffic Effects – Section 19.0
- Lack of Infrastructure and Cost to Ratepayers – Section 20.0
- Effects on Character and Amenity – Section 21.0
- Retirement Village – Section 22.0
- Other Matters – Section 23.0

For ease of reference for grouped matters, the number of the submission given by the EPA may be found in Column 1 of each of the below tables. A complete list of the submitter names and addresses, including their submission number, can be found in Section 24.0 for reference.

## 1.0 Response to Submission 1 - Peakedale Neighbours

No.	Summary of Comment	Applicant Response
1.	Absence of economic case for development. Reference to Nicola Willis letter dated 26/03/2025, lack of national or regional significance, lack of housing demand and employment prospects in Matamata	Please refer to response within Section 17.0 below and the Economic memo included as <b>Attachment 7</b>
	Adverse effects on rural nature of Matamata	Please refer to response within Section 21.0 below, and the planning response included as <b>Attachment 2</b>
	Stress on infrastructure	<p>Maven's s53 Technical Response Memorandum (included as <b>Attachment 9</b>), infrastructure report and design drawings demonstrate Ashbourne does not create any stress on Civil infrastructure, in contrast it provides for much needed infrastructure as follows:</p> <ol style="list-style-type: none"> <li>1. Water and Wastewater: As the relevant professionals and after considerable engagement Maven and MPDC technical experts have agreed that capacity is available subject to improvements / upgrades that Ashbourne has agreed to implement and pay for. These improvements include upgrades to an existing wastewater pumpstation that is over capacity, adding resilience to infrastructure, pipework on Burwood Rd which will replace ageing infrastructure while also paying full contributions towards the in progress MPDC wastewater treatment plant upgrade. When considered in the context of Insight's evidence payment of these contributions in the shorter term will lessen the burden on Matamata ratepayers/infrastructure budgets.</li> <li>2. Roading- Ashbourne provides a collector road linkage that has been identified for some time by MPDC (structure plan and MPDC LTP) between Station Rd and Firth St. This linkage was identified when the land was previously rezoned by Council as rural residential. Land and the Firth St end has already been procured by MPDC and some funding allocated towards construction. Ashbourne has agreed to</li> </ol>

	<p>assist Council in paying for some of the costs associated with completing the linkage. The completion of this linkage will remove pressure off other parts of the road network.</p> <p>Until this linkage is created the PDA agreement between MPDC and Ashbourne along with the proposed consent conditions require any upgrades/improvements on the existing network (should stages progress faster than the linkage) to be identified by an ITA and undertaken by Ashbourne. Such works have already been scoped by MPDC and Ashbourne's technical experts. No other roading constraints have been identified by any of the other experts, including NZTA's representatives.</p> <ol style="list-style-type: none"> <li>3. Electricity Generation. As has been identified by the government, electricity generation is a national issue with supply not meeting demand and aging infrastructure. The north island is especially undersupplied and relies on transmission cables from the South Island. The solar will provide electrical generation at a point of demand as new demand is created from the residential and retirement village developments.</li> <li>4. Stormwater Infrastructure – Refer to techncial memo attached and updated SMP for additional information. Ashbourne's greenway provides stormwater infrastructure which will intercept overland flows which otherwise flow north to Station Rd. The greenway stores these floodwaters on the Ashbourne site lessening the offsite effects of stormwater to Station Rd residents. The greenway also offers significant ecological benefits along with the proposed wetlands as ecology can be improved and preserved around a protected environment as opposed to a series of farm drains and Station Rd table trains which are regularly excavated and cleaned out.</li> </ol>
Loss of productive land and rural landscape	Please refer to response in Section 16.0 below and the NPS-HPL Memo included as <b>Attachment 3</b> .

Poor performance of the developer in engaging with neighbours	<p>Unity acknowledges these concerns and has previously provided engaged via email. This was primarily via Ken Johnson, who was understood to be acting as a representative for the Peakedale neighbour group.</p> <p>It was later mentioned that Angela Thomasen had become the representative for the Peakedale neighbour group, Unity made contact by email (17-Sept-25) to engage on these concerns with no response. Unity did not engage with each individual landowner, as we were informed they were working as a collective and to engage via their representative.</p>
10. Traffic effects on Peakedale Drive. Desire for early connection to Firth Street.	<p>It is acknowledged that a connection to Firth Street will provide wider network benefits to the area. The land required to facilitate this connection is not owned by the applicant, and as such a designation is required to facilitate the provision of this connection.</p> <p>The applicant has committed to providing this connection following the designation process undertaken by MPDC.</p> <p>The location of any gates is yet to be confirmed, however a requirement to prevent queuing on the existing road network will be included within the Construction Management Plan (CMP) and CTMP.</p>
11. Construction effects in early stages of development – particularly adverse effect on outlook due to existing low fencing.	<p>As noted below, the Developer is willing to engage with adjacent landowners to provide new fencing in advance of earthworks.</p>
<p>Specific requests if the development was approved:</p> <ul style="list-style-type: none"> <li>That a road connection to Firth Street be considered a priority and constructed before Civil Works commence</li> <li>That the developers provide reimbursement of expenses (material and labour) associated with the alteration or replacement of rear boundary fences of affected properties without restriction on design. This would include addition of a hedge if desired.</li> </ul>	<p><u>Firth Street Connection</u></p> <p>It is acknowledged that a connection to Firth Street will provide wider network benefits to the area. The land required to facilitate this connection is not owned by the applicant, and as such a designation is required to facilitate the provision of this connection.</p> <p>The applicant has committed to providing this connection following the designation process undertaken by MPDC.</p> <p><u>Rear boundary treatment</u></p>

	<p>The Developer is willing to provide reimbursement of expenses (material and labour) associated with the alteration or replacement of rear boundary fences of numbers 48, 50, 52, 54, 56, 58, and [REDACTED]. The extent of reimbursement would be based on reasonable cost of a 1.5m-1.8m high impermeable timber fence, to be constructed at the time of Earthworks.</p> <p>2m of landscaped buffer planting has also been added to the common boundary between these properties, and will be provided at the developers expense. Details of proposed planting can be found within Landscape Drawings as <b>Attachment 5</b>.</p> <p>We note that 35, 37, and 39 Peakedale Drive are not included in the above agreement as they adjoin land zoned residential, and development of this portion of the site is anticipated by the District Plan.</p> <p>The Applicant is also willing to engage separately with relevant landowners to agree reimbursement for hedge planting within their site, however note that this cannot form part of the Panel's assessment.</p>
--	---

## 2.0 Response to Submission 2 & 30 – [REDACTED]

No.	Summary of Comment	Applicant Response
2. & 30.	That the developer commit to addressing the road traffic issues at the end of Peakedale Drive given the serious effect that this would have on our lives. This would involve accelerating an alternative road connection into the development and pushing the gated entry point well inside the development and away from the current road end.	<p>A cut to fill balance has been achieved on site especially for the first two stages. This cut to fill balance will limit traffic to deliveries (some heavy vehicles but infrequent) and lighter vehicles (ie contractors utes). The later stages are not proposed to use Peakedale Dr for construction traffic. Please refer to memorandum prepared by Maven Associates included as <b>Attachment 9</b>.</p> <p>The location of any gates is yet to be confirmed, however a requirement to prevent queuing on the existing road network will be included within the</p>

	<p>Construction Management Plan (CMP) and CTMP. A provision will be made once site is established that no queueing on Peakedale Drive will be accepted and that the gated entry point is well inside the development and away from the road end when it is practical to do so. Monitoring will be undertaken to ensure compliance.</p>
<p>That the developer commit to re-designing the build plots beyond our rear fence reducing the number from four to two or even none so as to give us a greater eventual distance from new houses</p>	<p>We sympathise with Ken and Chris, and consideration has been put towards finding an option that would be acceptable to their unique situation and allow the development to proceed.</p> <p>The Applicant considers the following commitment made to [REDACTED] [REDACTED] along with the other commitments to the wider Peakedale neighbour group, provide a considered response.</p> <p>Unity commit to postpone the delivery to 4 Lots (107-111) to be deferred and linked to Stage 3 – Estimated 2030. A mechanism for this will be incorporated into the conditions of consent in due course.</p> <p>Unity will update the SW Basin A planting plan to include planting on the Eastern boundary of Lot 108+109. This will soften the outlook with planting from [REDACTED]</p>
<p>That the developer compensate us for the costs of fence reconstruction or hedge addition to protect us from the effects of the development.</p>	<p>Agreed. Refer to response to Submission 1.</p>

### 3.0 Response to Submission 4 – Pippins Development Limited

No.	Summary of Comment	Applicant Response
4.	Wastewater rising main approval has not been provided	Unity has engaged with this landowner and provided information with regards to our proposed design and plans. This prior engagement indicated willingness to collaborate on local infrastructure solutions but were not in a position to

	<p>consent due to not finalising their own design. Unity continues to remain open to co-ordinate works with Pippins development and road construction.</p> <p>Unity was unaware of the extent of these concerns or request until s53 comments received. Consultation Records are available to panel on request.</p> <p>Since the engagement has occurred between Unity and Pippins, MPDC have confirmed they would progress the designation for road and servicing identified for some time by MPDC (Eldonwood South Structure Plan) between Station Rd and Firth Street. This is with an unconfirmed timeframe, so intent is to work collaboratively to make use of connection when available.</p> <p>Land at the Firth Street end has already been procured by MPDC and some funding allocated. MPDC has proposed to designate this road corridor, and Unity are working with MPDC to agree on details to complete this through the PDA. Ashbourne has agreed to assist Council in paying for some of the costs associated with completing the linkage.</p> <p>This is being formalized via a Private Developer Agreement which Unity and MPDC have been working together on. The completion of this linkage will remove pressure off other parts of the road network.</p> <p>Infrastructure design and servicing has considered all current and future developments, and construction methodology will be in collaboration with all Pippins works. Please refer to memorandum prepared by Maven Associates as <b>Attachment 9</b>.</p>
Supports co-ordinated growth in principle, but considers that proposal does not adequately address infrastructure issues	Noted. Please refer to infrastructure comments noted within Maven's memorandum included as <b>Attachment 9</b> .
Service Corridor Issues - Unresolved MPDC approvals and layout dependencies, servicing risks, network capacity uncertainty, construction	As has been outlined in the Peakedale residences response above, the collector road connection through Pippins Development's land to Firth St has been identified by MPDC as being of strategic importance to the wider

<p>methodology conflicts, and panel's own concerns in alignment (groundwater and soakage)</p>	<p>transport network. Maven has been advised by MPDC that they are considering designation of this corridor through Pippins property. This alignment through Pippin's land is effectively fixed as there remains only a short straight-line section between the Council acquired land and Ashbourne's road corridor.</p> <p>With respect to the infrastructure design and a land utilities corridor as can be determined by the response to the Peakedale residences above, Ashbourne, while supportive of Council's position is not contingent on this connection for any part or stage of the project. An alternative but longer route has been identified for the wastewater rising main and plans included within the application to follow existing road corridors clear of any private land.</p> <p>Road linkage to Station Rd and upgrades already identified and subject to an ITA can allow the full development to occur without this connection (refer also evidence of Commute). The outstanding matters raised by Pippins Development Ltd will either be resolved in time with Council as Pippins develops the land and creates the connection or the alternatives will proceed.</p> <p>To specifically address the Pippins items:</p> <ul style="list-style-type: none"> <li>• Unresolved MPDC approvals and layouts are irrelevant to Ashbourne being able to be delivered. This is a matter between MPDC and Pippins</li> <li>• Servicing risks, should the future rising main and 33kva cable go through Pippins land (again development is not contingent on this as alternatives have been documented) then this is a simple co-ordination issue. Rising mains and electrical cables do not require fall and can be raised or lowered to avoid any clashes with the shallow gravity sewer and stormwater. The rising main is not required until stage 3 some 3-4years away allowing plenty of time should Pippins wish to co-ordinate. Should a designation occur, due process allows such matters to be considered.</li> <li>• Network capacity has been confirmed by MPDC as Ashbourne is paying for any upgrades that result from the development. MPDC's infrastructure</li> </ul>
---	---

	<p>modelling advice included future development of all developable areas including Pippins for the next 30years. The ability to connect has been settled and confirmed. MPDC's strategy has always been development pays for development and as such Maven can confirm the Ashbourne development does not prejudice the servicing of Pippins land and calculations have been provided in our infrastructure report and modelling from MPDC's technical expert (WSP) as part of the substantive application.</p> <ul style="list-style-type: none"> <li>• Construction methodology is again a simple matter for co-ordination <u>should</u> this route be utilized in 3-4 years. The cables and rising main will not simply go in, in isolation. They will be constructed either in conjunction with the road (with full Engineering Consent co-ordinated design) or after Pippins have constructed the road linkage as part of their development.</li> <li>• Refer to Maven s53 Technical Response Memorandum</li> <li>• Refer to updated SMP with additional ground water modelling and design updates.</li> </ul> <p>Please refer to infrastructure comments noted within Maven's memorandum included as <b>Attachment 9</b>.</p>
Traffic and sequencing – background on Structure Plan and concerns around number of stages to be constructed via the Peakedale Drive connection	<p>Please refer to the Traffic Memo included as Attachment 25, which addresses updated staging for construction traffic to reduce the construction traffic utilising Peakedale Drive as much as feasible.</p>
The following summarises conditions sought by Pippins: <ol style="list-style-type: none"> <li>1) Property rights precondition</li> <li>2) Road network precondition</li> <li>3) Utilities before road prohibition</li> <li>4) Design co-ordination &amp; certification</li> <li>5) Capacity non-prejudice</li> <li>6) Cumulative effects management</li> <li>7) Reinstatement &amp; indemnity</li> <li>8) Relocation at applicant's cost</li> </ol>	<p>Response on Conditions Sought</p> <ol style="list-style-type: none"> <li>1) No work will be undertaken on Pippins land without prior agreement. Should designation occur, Unity will work with MPDC to progress this road connection.</li> <li>2) Unity and its consultants design is based on servicing connections starting from Peakedale Drive and the Eastern part of its site. This remains the most logical place to start the initial residential development. Connection through to Station Road will be achieved as per the application.</li> </ol>

		<p>3) Unity prefers to positively engage with Pippins and remain open to co-ordinate works with Pippins staged development and road construction.</p> <p>4) Refer to memorandum included as <b>Attachment 9</b></p> <p>5) Refer to memorandum included as <b>Attachment 9</b></p> <p>6) Refer to response to Minute 2 prepared by B&amp;A relating to cumulative effects.</p> <p>Unity will not be working on/within Pippins owned land without their permission. Unity are not reliant on this corridor to progress, as such this is not required.</p>
--	--	---

## 4.0 Response to Submission 12 - Station 143 Limited and Begovich Investments Limited Comment

**Table 1: Station 143 Limited and Begovich Investments Limited Comment**

No.	Summary of Comment	Applicant Response
	Road and walkway connectivity not supported	The pedestrian connection has been removed from Plans, and the Applicant commits to not providing a vehicle or pedestrian connection to Highgrove Avenue based on this feedback.
12.	<p>Mitigation planting &amp; amenity of Highgrove:</p> <p>1) A strip no less than 10 metres wide</p> <p>2) Native species planting at 900mm centres</p> <p>3) Installation of a full irrigation system</p> <p>4) A 100mm bark cover</p> <p>5) A minimum 5 year maintenance and establishment period</p> <p>6) Agreement on detailed planting and specifications prior to implementation</p> <p>7) Implementation immediately on successful application to allow growth prior to start of construction of these stages</p> <p>Suggested consent notice</p>	<p>The design intent of the buffer is to establish a naturalised planting corridor that softens views of the proposed development while enhancing the local landscape character. The mixed native planting will provide effective visual mitigation through varied height and texture, while also creating an ecological corridor that supports habitat improvement and biodiversity.</p> <p>The proposed buffer mitigation planting is proposed to commence from the southern side of Stormwater Pond 1. This starting location has been selected due to the substantial setback from the nearest proposed retirement village building. The combination of open space and the proposed specimen trees surrounding the stormwater retention area will provide sufficient visual mitigation and maintain the intended landscape character.</p>

A 3-metre-wide landscape buffer is proposed along the Retirement Village site, running parallel to the existing swale. This alignment avoids disturbance to the swale and ensures water can continue to flow freely within the Overland Flow Path (OLFP). The 3-metre-wide buffer will continue along the southern boundary within the adjoining Ashbourne residential development and extent north encapsulating the interface between the Ashbourne development and Highgrove.



Figure 1: Proposed Ashbourne / Highgrove Buffer Extent. Source: Greenwood Associates

	<p><u>A strip no less than 10 metres wide</u></p> <p>A proposed 3-metre wide buffer provides suitable space to meet the visual and ecological needs of this boundary. A 2-metre width would usually be adequate and would allow for two planting rows, to achieve the intended amenity and screening outcomes, consistent with other boundaries adjoining existing rural and rural-residential properties. The wider 3-metre strip has been adopted out of respect for the submitter and the discussions held to date. This extra space supports three planting rows at 1.2-metre spacings (0.802 plants per m<sup>2</sup> using triangular multiplier), which helps create a denser and more natural screen without affecting neighbouring areas. Most of the selected species should reach a strong level of maturity within five to seven years, developing fuller canopies and stronger root systems that deliver the intended amenity, screening, and ecological benefits.</p>
--	---



**Figure 2: 3.0m Wide Native Specimen Buffer - Graphical Section. Source: Greenwood Associates**

Native species planting at 900mm centre

Planting at 1.2-metre centres allows space for healthy growth and natural form while still achieving effective screening. It reduces competition and maintenance compared with tighter 900mm spacing as recommended by the submitter. The mix of *Cordyline australis*, *Kunzea ericoides*, *Leptospermum scoparium*, *Myrsine australis*, *Phormium cookianum*, *Pittosporum crassifolium*, *Knightia excelsa* and *Sophora microphylla* offers varied height and texture, ensuring effective screening, seasonal interest and habitat value

Installation of a full irrigation system

A full irrigation system is not required for the Waikato region, as planting will occur between April and September when rainfall is generally reliable and soil

	<p>moisture is high. This timing supports strong establishment without the need for permanent irrigation. Ongoing watering will still be included as part of the two-year maintenance period to keep plants healthy through drier months, following the timelines set out in the Planting Implementation and Establishment Specification.</p> <p>Watering should be carried out using a mobile water source such as a tanker or towed water cart, which is the most reliable option for undeveloped sites where access to mains water is limited.</p> <p><u>A 100mm bark mulch cover</u></p> <p>100 mm minimum unstained reharvest or cambium bark is recommended. This helps retain moisture, suppresses weeds, regulates soil temperature, and protects roots while maintaining a natural appearance.</p> <p><u>A Minimum 5-year maintenance and establishment period</u></p> <p>A <b>two-year maintenance period</b> is sufficient to allow plants to establish. This timeframe supports healthy root development, canopy growth, and overall plant survival, after which ongoing maintenance can be reduced to standard care.</p> <p><u>Agreement on detailed planting specifications prior to implementation</u></p> <p>Detailed planting specifications will be prepared and confirmed during the project's detailed design stage, as required by the consent conditions. The establishment of the buffer planting will follow those conditions, including a consent notice that sets out maintenance requirements.</p> <p><u>Implementation immediately on successful application to allow growth prior to start of construction of these stages</u></p> <p>The various planting buffers will be installed once earthworks are complete, during the winter planting season. This timing supports healthy establishment</p>
--	---

	<p>and helps ensure the buffers reach their intended height and function as expected.</p> <p>In addition to the above, Unity commits to a <b>5 metre building setback</b> to be implemented on all Residential Lots adjoining Highgrove. For completeness, it is noted that all villas on the Retirement Village site are already set back in excess of 5m from the common boundary.</p>
<p>A suggestion by the Developer was that they would look at a 2m-3m Greenway corridor which would be planted after the subdivision was completed, and suggested that it could be planted on Highgrove land</p>	<p>As a response to Highgrove landowners request to undertake earthworks prior to planting within our site on the boundary, Unity suggested an option that planting could occur within Highgrove Ave properties, at Unity's expense. The rationales for this offer was it would allow earlier planting than Unity could commit to, and Highgrove owners would have greater control on the planting – with immediate selections and long term heights. Unity was presenting an option to address some of the concerns raised by Highgrove.</p> <p>Further to this, Unity have in good faith had further correspondence with Highgrove where offer/terms were made to reach an agreement, however this was not accepted by Highgrove landowners. Consultation Records are available to panel if required.</p>
<p>Groundwater – water table clarification</p>	<p>Refer to Maven s53 Technical Response Memorandum (<b>Attachment 9</b>) along with the updated Stormwater Management Plan (SMP) (<b>Attachment 12</b>) with additional ground water modelling and design updates</p> <p>Ongoing testing by CMW has confirmed that winter water tables are significantly higher than previously measured, consistent with Highgrove's statement. Achieving a vertical clearance to the watertable at the Highgrove end of the site (the lowest lying land in the northern catchments) for both the retirement village and residential lots is not possible. The winter high water table will effectively sit at the bottom of the previous detailed dry ponds which will limit the effectiveness of soakage during the winter periods. In essence Maven is in general agreement with Highgrove, however this high-water table is not an issue that cannot be resolved with a simple Engineered solution.</p>

	<p>The high-water table was not an unexpected result; contingency, and redundancy had been built into the design for such an occurrence. As a part of the SMP various modelling scenarios were considered including sensitivity testing with zero soakage, all pipe networks blocked, and extreme climate change adjustment scenarios, resulting in oversized dry ponds with storage that could effectively contain all SW discharge from the site in a 1% AEP event. This was a very conservative scenario that now permits the design to be simply updated with the removal of soakage from the lower lying areas, adjoining Highgrove, which can now be replaced with a conventional pipe network to discharge at 80% pre-development in accordance with WRC's standards without compromising on stormwater management.</p> <p>With soakage not available, the highly conservative design scenario with 0 off site flows for most events (as stormwater is disposed of onsite via soakage) in these northern catchments is not possible. Some discharge to Station Rd will be required, however, as will later be demonstrated in response to the next Highgrove comment, these flows are still considerably lower than the existing pre-development situation.</p> <p>With a conventional pipe network utilised for the lower lying areas, this also allowed for a better ecological solution by replacing the on-road rain gardens and catchment dry ponds with wetlands.</p> <p>The High-water table in these areas is not an issue that prevents development. These are simple detailed design considerations in terms of preventing infiltration into pipes (spec of materials), additional roading subsoils etc.</p> <p>With regard to the groundwater levels recorded, the recorded groundwater levels submitted are from a disused bore near basin C. The interpretation of these data would require information on the bore lithology and construction details (in particular bore depth). Groundwater levels vary with depth and sub-artesian conditions often occur. Shallow groundwater levels near this area</p>
--	--

	<p>have been monitored over summer, autumn and winter as presented in the WGA memo included as <b>Attachment 4</b></p>
<p>Stormwater – flooding of existing drains</p>	<p>Refer to memorandum prepared by Maven Associates included as <b>Attachment 9</b>.</p> <p>The statements and photos from Highgrove are relatively consistent with the known predevelopment state and stormwater flood modelling prepared by Maven. The Highgrove site when developed pushed the farm drains to the boundaries on either side to maximise developable land. These drains are indeed small, flow to Station Rd then to the Waitoa stream and receive a large existing upstream catchment including much of the Ashbourne site.</p> <p>In larger events, and in future as climate change increases rainfall intensity, the flows in the undeveloped existing state will be considerably worse than that identified by Highgrove. The large upstream catchment although quite flat does have undulations and depressions. As rainfall develops, ponding first results throughout the catchment, it then takes time and considerable rainfall depth before the depressions are filled at which point much larger overland flows and more flooding than that shown by the photos will eventually develop.</p> <p>The Ashbourne development results in significant improvements to Highbrook and the Station Rd residents with respect to stormwater and flooding. Design features of the development that achieve this are:</p> <ol style="list-style-type: none"> <li>1. The proposed Greenway intercepts a large part of the catchment that otherwise flows through Highgrove and Station Rd. It bypasses these areas by diverting the flows directly to the eventual receiving environment the Waitoa stream while providing additional storage to replace what would otherwise be stored in the Highbrook and Station Rd drains.</li> </ol>

	<ul style="list-style-type: none"> <li>2. Soakage and dry pond storage, while not proposed everywhere with the high-water table in the lower lying areas of the north, some are still proposed where suitable vertical clearance is available.</li> <li>3. Detention Tanks are proposed to dwellings within the northern catchment where soakage vertical clearance is not achievable.</li> <li>4. The proposed wetlands to the retirement village and northern residential catchments include detention for events upto the 100yr event with slow release below predevelopment levels.</li> </ul> <p>The end result is a significant reduction in not only peak flows but also the total volume of stormwater runoff to Highgrove and Station Rd as detailed in Maven's s53 Technical Response Memorandum.</p>
Potable water – queries with regards effect on Highgrove bores from groundwater take	The submitter's water supply bores are plotting on the WRC database on Lot 5, whereas the submission indicates that the bores are on Lot 9 and Lot 5. WGA assumed that one of the Highgrove bores was on the western side of the property (based on WRC information). The distance to the bore on Lot 9 is further than the initial assessment that used 350 m. Therefore, the effects are likely to be less than our conservative assessment. All modelling has shown less than minor effects on the water supply bores.
Wastewater – trucking sewerage off site	Refer to memorandum prepared by Maven Associates included as <b>Attachment 9</b> , and updated technical information enclosed within <b>Attachments 10-14</b> . It is noted that on-site and privately managed Wastewater Treatment Plants are common in Retirement Villages on urban edges across New Zealand.
Attachment 9 – Urban Design Review from Weir + Co	The matters raised in the review from Weir + Co, where relevant, are addressed in the response provided to Ian Munro's evidence on behalf of Matamata Piako District Council, and are included as <b>Attachment 23</b>
Attachment 2 – Barr and Harris Engineering Review	Unfortunately, we must note that Barr and Harris did not reach out to Maven to inform us this review was occurring or pose any questions or clarifications during the process before producing their review document. When a review of another Engineers work is undertaken the reviewer has an ethical obligation

	<p>to consult with the designer as outlined Engineering NZ practice note "Peer review practice note version 2 page 9 and 10.</p> <p>This process is necessary to ensure that reviewers comments are informed and not simply a round of questions that could easily have been refined down to potentially nothing with engagement as outlined by Engineering NZ. This is of particular importance in this context where there is a large volume of information to process with significant background like extensive discussions with MPDC and WDC around stormwater management.</p> <p>The reviewers' comments should therefore be taken in this context,</p> <p><b><u>Water Supply Impacts</u></b></p> <p>The Ashbourne development assists with the long-term infrastructure costs by paying full development contributions and upgrade costs. Water supply is available which has been confirmed by testing and MPDC modelling. Booster pumps maybe required with future testing only within Ashbourne.</p> <p>Refer to Supporting documentation, including MPDC Comment Annexures I and K and the draft PDA, providing detailed technical feedback, financial principles, and formal agreements with MPDC</p> <p><b><u>Wastewater Impacts</u></b></p> <p>The Ashbourne development assists with the long-term infrastructure costs by paying full contributions for the Matamata treatment plant upgrade in a shorter timeframe than otherwise anticipated and also provides new infrastructure (and Upgrades to old) wastewater.</p> <p>Refer to Supporting documentation, including MPDC Comment Annexures I and K and the draft PDA, providing detailed technical feedback, financial principles, and formal agreements with MPDC</p>
--	--

	<p><u>Stormwater Impacts</u></p> <p>Refer to above response to Station 143 Limited and Begovich Investments, Highgrove Ave and Maven s53 Technical Response Memorandum along with the updated Stormwater Management Plan (SMP) with additional ground water modelling and design updates.</p> <p><u>Traffic Impacts</u></p> <p>Traffic matters are addressed in the Traffic memo prepared by Commute and included as <b>Attachment 25</b>.</p> <p><u>Liquefaction</u></p> <p>The calculated liquefaction-induced vertical settlements for IL2 structures are presented in Section 6.4 of the updated GIR. The calculated liquefaction-induced vertical settlements are not uncommon for the wider area. Mitigation solutions, which are widely used in New Zealand for similar development, exist to mitigate liquefaction effects. Mitigation solutions include waffle slab foundations, designing superstructures to take the settlement into account. Refer to the updated GIR issued on the 17th November 2025, referenced HAM2023-0124AI Rev 3 for more detail (included as <b>Attachment 5</b>).</p>
<p>The Property Group has provided a review of the application which addresses urban design, infrastructure, and planning matters. NPS-HPL matters are addressed separately below.</p>	<p>It is considered that the points raised in the Property Group's memorandum are sufficiently addressed, where they are relevant, under the Planning Response (<b>Attachment 2</b>) and Urban Design memo (<b>Attachment 23</b>).</p>
<p>The Property Group have provided a review of the application which addresses the NPS-HPL, and considers that:</p> <ul style="list-style-type: none"> <li>• There are no permanent or long-term constraints on use of the land for primary production;</li> <li>• The proposal will not avoid any significant loss of productivity;</li> <li>• The proposal will result in fragmentation of the land into smaller lots;</li> <li>• Potential for reverse sensitivity is increased rather than mitigated; and</li> </ul>	<p>Broadly, I note that The Property Group incorrectly identify that the application will be changing the underlying zoning. This is incorrect and the underlying rezoning will remain unchanged.</p> <p>The following comments are provided following review of Submission 12 and the matters relevant to the NPS-HPL that are discussed in the assessment prepared by The Property Group:</p>

<p>Environmental, social, cultural, and economic benefits do not outweigh the resulting costs.</p>	<ul style="list-style-type: none"> <li>• The Waikato Regional Policy Statement (RPS) has not been updated in accordance with clause 3.5 of the NPS-HPL to map highly productive land. Accordingly, clause 3.5(7) and the definition of LUC1, 2, or 3 applies. The New Zealand Land Resource Inventory (NZLRI) is acknowledged in this case, however it is noted that the NZLRI is provided at a broad scale of 1:50,000, and represents a coarse level of information for the purposes of identifying highly productive land. It is also widely accepted the NZLRI contains existing mapping errors.</li> <li>• A site-specific land use capability classification assessment has been prepared by Landsystems in accordance with the NPS-HPL definition to inform a more accurate and considered classification of existing soils and assessment of potential effects. As outlined in the AEE and Landsystem's report, the site is subject to a number of long-term constraints which affect the viable use of the use of the land for land-based primary production.</li> <li>• The productive capacity of the land and surrounding area is already significantly impacted by the underlying Rural-Residential zoning for part of the site. There are also existing constraints as identified in the Land Use Capability Classification Assessment at Appendix 1L of the application. Given these existing constraints and the context of the surrounding environment, the use of the Ashbourne Development site for a different function can ensure stronger protection for other areas with genuine LUC 1-3 soils that is not constrained.</li> <li>• In addition to the limitations identified by Landsystems, Submissions 33, 36, and 40 describe the land within the site and highlight the constraints to operate profitable productive farming activities from an operational perspective. In particular: <ul style="list-style-type: none"> <li>○ The land area is constrained with limited ability for expansion to achieve a more efficient landholding and larger dairy unit, given the presence of existing rural-residential activities that have established under the Eldonwood Structure Plan. The average New Zealand dairy farm is almost double this size at 153 hectares.</li> </ul> </li> </ul>
--	--

	<ul style="list-style-type: none"> <li>○ Farm management activities, including spraying for effluent management or spreading manure to mitigate nitrogen loading is constrained by the close proximity of rural-residential activities.</li> <li>○ Existing development on Station Road represents a transition between the existing rural and urban environments. The nature of traffic on this road constrains the ability to farm productively on the northern side as cows cannot safely cross Station Road.</li> <li>● The majority of the proposed residential activities are located on land exempt from the requirements of the NPS-HPL, and only a limited extent of subdivision is proposed with respect to the solar farm and retirement village activities. The extent of fragmentation into smaller lots as part of the whole development proposal is therefore considered to be limited in scale.</li> <li>● As outlined above, the land which will accommodate the proposed solar farm activities will also include provision for pastoral grazing. The proposal does not seek to utilise the full extent of land subject to the NPS-HPL for non-productive land uses.</li> <li>● The Property Group comments identify that the proposal will adversely affect rural character and amenity values, and result in reverse sensitivity effects on resulting abutting different land use environments. As set out in the AEEs' and supporting landscape assessments, the Ashbourne proposal will avoid and mitigate potential effects on rural character and amenity values 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 planting strategy. It is unclear how potential effects on rural character and amenity values will increase the potential for reverse sensitivity effects. Furthermore, it is noted that existing environment represents a transition between the rural and urban environment, and abutting rural and urban land uses will inevitably occur in this context.</li> </ul> <p>In this case, potential reverse sensitivity effects will be mitigated through the location and design of proposed activities and the landscape buffers, which respond to the location of rural-residential lots and more sensitive activities</p>
--	--

	within the surrounding environment. On this basis, the proposal will not increase the potential for reverse sensitivity and will maintain an appropriate transition between the rural and urban environment.
--	--

## 5.0 Response to Submission 21 - [REDACTED]

Table 2: [REDACTED] Comment

No.	Summary of Comment	Applicant Response
21.	Driveway Ownership and Access, including maintenance	<p>Unity have had email correspondence with Robyn and Steven. Both parties agree that Unity purchasing the driveway to combine the driveway and Road 1 to Station Road is a logical and better outcome for all parties. This would enable provision of vehicle crossings/access for 129A and [REDACTED] directly onto Road 1, and remove the need for the bend in Road 1 onto Station Road.</p> <p>Unity expresses our intent on this but cannot make commitment in this application as several items would be required to finalise this which are unexpected to be resolved prior to required deadlines under the FTA. These include but not limited to an agreement on any compensation and timing of payment, agreed design and details on new road layout, and the agreement of external parties with easements (specifically [REDACTED])</p> <p>Proposed that this is reviewed during detailed design closer to the time of this portion of Road 1 being constructed.</p> <p>With regard to maintenance of the driveway, Unity will continue to act as a landowner and neighbour with the rights and responsibilities that will come with this..</p>

	<p>We have been informed the existing hedge maintenance is undertaken each year and costs shared with adjoining landowners of this hedge – being 127 Station Road and 129 Station Road Landowners. Unity are happy to continue this arrangement. This will be a private agreement between parties.</p> <p>With regards to specific damage on the driveway from our use, Unity will undertake a dilapidation survey to record existing condition and if Unity cause any damage, will be responsible for this repair. This will be a private agreement between parties.</p>
Stormwater management, including liability for damage caused by flooding	Refer to memorandum prepared by Maven Associates included as <b>Attachment 9</b>
Construction traffic using private driveway	<p>Our application is based on not using or relying on 129B driveway for its design or construction. The proposed Road 1 is sitting entirely within the applicant's site, and not using/merging with Chestnut Lane.</p> <p>It is not intended (or part of the application) that Chestnut Lane will be used for construction traffic. Access points for construction will be via Peakedale Drive initially and later at the location of the proposed Spine Road intersection with Station Road after stage 2 or via Firth Street (when constructed).</p> <p>There will still be access to the property for continuing use by small vehicles, as provided by current access rights. Once earthworks/construction starts, this will be approved and managed by the CTMP.</p>

## 6.0 Response to Submission 22 - [REDACTED] Comments

Table 3: [REDACTED] Comment

No.	Summary of Comment	Applicant Response
22.	Reverse sensitivity effects, including consideration of larger lots on southern boundary aka 800m <sup>2</sup> , and	Unity make the following commitments in response to items raised by [REDACTED]

<p>consideration of how to manage organic farming component</p>	<ul style="list-style-type: none"> <li>Unity commits to implementing a 2m boundary buffer planting along the length of the [REDACTED] and [REDACTED] where there are new residential properties within the Applicants site. The buffer will be planted in the first planting season following residential earthworks. Refer response below. A consent notice to be placed on adjacent titles to ensure this is maintained.</li> <li>Unity commits to implementing a 5m Building Line Restriction along the length of the 72A and [REDACTED] where there are new residential properties within the Applicants site.</li> <li>Unity commits to adding a No complaint covenant for all residential properties which adjoin [REDACTED]. This covenant will prohibit any complaints against the existing farming operation being undertaken.</li> </ul> <p>Based on feedback received via email correspondence, Unity has also included the provision of a road connection to the south through deletion of Lot 46, to enable flexibility on future use of the land should development be pursued in the future.</p>
<p>Landscape Planting requested to be installed along the entirety of the boundary</p>	<p>A 2.0-metre-wide buffer planting is proposed for this area as the existing vegetation already provides strong visual separation, enhances privacy, reduces light spill, and supports ecological continuity. The new planting within this 2.0-metre buffer strip will serve as supplementary mitigation, addressing minor gaps and reinforcing the existing landscape rather than acting as the primary screen. Given the maturity and density of the current vegetation and the clearly defined property boundaries, a 2.0-metre-wide buffer is sufficient to provide additional screening and landscape continuity without compromising the functionality and liveability of adjoining properties. The extent of planting is illustrated in Figure 3 below.</p>



**Figure 3: Proposed Extent of 2.0m Planting Buffer to the Southern Boundary. Source: Greenwood Associates**

A proposed 2-metre wide buffer provides suitable space to meet the visual needs of this boundary. A 2-metre width buffer is adequate and would allow for two planting rows (0.802 plants per m<sup>2</sup> using triangular multiplier) to achieve the intended amenity and screening outcomes, consistent with other boundaries adjoining existing rural and rural-residential properties. Most of the selected species (*Cordyline australis*, *Kunzea ericoides*, *Leptospermum scoparium*, *Myrsine australis*, *Phormium cookianum*, *Pittosporum crassifolium*, *Knightia excelsa* and *Sophora microphylla*) should reach a strong level of maturity within five to seven years, developing fuller canopies and stronger root systems that deliver the intended amenity, screening, and ecological benefits.

Detailed planting specifications will be prepared and confirmed during the Project's detailed design stage, as required by consent conditions. The establishment of the buffer planting will follow those conditions, including any consent notices that set out maintenance requirements.

Consideration of 6m setback of dwellings along southern boundary

As noted above, a 5m Building Line Restriction is to be implemented on all Lots adjoining the common boundary.

Hydrology – effects on bore

The submitters bore is approximately 1.6 km from the proposed groundwater take and appears to be either numbered 72\_5412 (30 m deep) or 72\_8688 (unknown depth). At this distance based on a drawdown assessment using conservative values the effects are considered to be less than minor.

Organic farming status – the lessee has to engage with neighbouring properties to ensure that they don't spray or use any products near the boundary that may compromise organic status.	We understand the commenters concerns. Unity is willing to engage with the neighbour on this matter further to understand what, if any, mitigation can be provided.
--	---

## 7.0 Response to Submission 23 - [REDACTED]

Table 4: [REDACTED] Comment

No.	Summary of Comment	Applicant Response
23.	50km speed limit to extend to Highgrove	The Applicant supports a reduced speed limit on Station Road to 50km/hr. This cannot be implemented by the Applicant and a separate process undertaken by MPDC is required via Land Transport Rule: Setting of Speed Limits 2024.
	Removal of existing vegetation (oak tree and hedge) and erection of fence	<p>The Developer agrees to the removal of the oak tree and hedge, and agrees to erect a new fence along the common boundary between [REDACTED] and the development.</p> <p>This fence is proposed to be 1.8-metre high solid timber paling fence, with a total length of 160 metres.</p> <p>Refer to below Figure 4 illustrating length of fence proposed, and Figure 5 reference image of proposed fence.</p>



**Figure 4: Plan highlighting length of fence in orange along common boundary.**



**Figure 5: Reference Image of Proposed 1.8m high solid fence**

Public services (healthcare/schools)

We have consulted with MoE and note existing capacity in local schooling with good connectivity provided throughout the Ashbourne development as well as vested roads that can provide for public transport and emergency services. The retirement village development will provide an element of onsite care for its older residents. The Ashbourne development incorporates a supportive commercial node that can provide for local needs such as healthcare services also.

## 8.0 Response to Submissions 34, 38, and 41 relating to [REDACTED]

No. Summary of Comment	Applicant Response
<p>Note: Several matters raised in Submissions 34, 38, and 41 are addressed throughout the MPDC comments and other neighbour comments, and are not duplicated in this response. Specific matters are addressed below.</p>	
Concern over the proposed boundary buffer planting for the northern solar farm growing to a height (5m) that will cast shadows over the dwelling (and associated curtilage) at [REDACTED] this would occur in the afternoon as [REDACTED] sits to the east of the proposed northern solar farm. We note that the dwelling and associated outdoor living at [REDACTED] sit within a 5m distance of the common boundary with the proposed northern solar farm.	<p>A minimum 3.0-metre-wide buffer is proposed along the northern boundary. The planting is expected to reach approximately 2.5 metres in height after five years, providing sufficient screening for single-storey homes in line with the surrounding residential context. Full maturity of around 5.0 metres is expected after ten years, offering strong screening of the solar panels and fencing.</p> <p>We acknowledge the concerns raised regarding potential shading from the buffer onto the dwelling, given the proposed species, location, and spacing, shading effects will be limited and occur only in the afternoon, and the buffer design balances visual mitigation with minimising impact on neighbouring properties</p> <p>Please refer to <b>Attachment 23</b> for further details.</p>
Concern that the proposed buffer planting and boundary fence at the northern boundary of the proposed northern solar farm will prevent access to the existing board drain	The Landscape Plans have been updated to show access to Board drain – refer to <b>Attachment 23</b> for further details.
Identified a discrepancy in listed dates of issue of the landscape assessment reports and the given dates of site visits.	<p>Comment received states: <i>'Pg 33 of 5.8 the writer of the assessment mentions the site visits undertaken 24th of June and 8th of November 2025 How can the assessment have taken place on the 24th of June and 8th of November 2025 when the report was produced on the 3rd of June 2025?'</i></p> <p>This is a typographical error and should read "Site visits undertaken 24th of June and 8th of November 2024" it should be noted that the correct date of the site visits was outlined in section 2.8 of the same Landscape Assessment report that Mr. Slattery is referencing (Landscape Assessment Report - Proposed Northern and Southern Solar Farms, Ashbourne Development, Station Road, Matamata 3472 - J002148-LA, Issue Date: 3 June 2025</p>
Noise and vibration effects were raised, including the following: a) Construction noise effects to shift workers	<b>a. Construction noise effects to shift workers</b>

<ul style="list-style-type: none"> <li>b) Operational noise effects to shift workers</li> <li>c) Noise effects to the workplace at [REDACTED]</li> <li>d) Noise encroachment on vacant land at [REDACTED]</li> <li>e) Noise and vibration effects on horses</li> <li>f) Effect of vibrations on the structure of the pool at [REDACTED]</li> <li>g) Construction noise and vibration effects</li> </ul>	<p>Mr Slattery identifies that the property at [REDACTED] is home to shift workers and raises concerns that construction noise will affect the quantity and quality of sleep.</p> <p>The highest predicted noise level at [REDACTED] during the use of the piling rig required for the closest panels with mitigation in place is 72 dB L<sub>A10</sub></p> <p>We can confirm that construction noise, even at levels that would readily comply with the 70 dB L<sub>A10</sub> limit would still affect a person sleeping during the day. The construction noise limits are not, and should not, be used to protect sleep disturbance during the day. By way of comparison, the permitted night-time construction noise limit is 45 dB L<sub>A10</sub>. This level of noise would not be achieved during the day irrespective of any level of mitigation in place, other than undertaking the work when the shift workers are not sleeping during the day.</p> <p>Notwithstanding, we understand that the applicant will endeavour to schedule the closest piling work during periods of the day when shift workers are not sleeping. This will involve a high level of advanced communication and engagement with the occupants of [REDACTED]</p> <p><b>b. Operational noise effects to shift workers</b></p> <p>Mr Slattery raises concerns that the operational noise from the solar farm will affect the quantity and quality of sleep. We do not agree with the concerns raised. The highest predicted daytime noise level at the notional boundary of [REDACTED] from the operation of the solar farms is 47 dB L<sub>A10</sub></p> <p>During peak production, the noise from the solar plant operating may be audible at [REDACTED] from time to time, but not at levels high enough to cause unreasonable noise effects.</p> <p>We consider that the noise effects will be consistent with the expectations set by the relevant objectives and policies and District Plan standards for noise, and that the noise will be reasonable.</p> <p><b>c. Noise effects to the workplace at [REDACTED]</b></p>
---	---

Mr Slattery raises a question about the operational noise effects to workplace buildings at [REDACTED]

We are assuming that Mr Slattery refers to these buildings circled red below:



The highest predicted daytime noise rating level at the closest façade of the buildings is 51 dB L<sub>A10</sub>. This level of daytime noise is unlikely to result in unreasonable noise effects for a commercial receiver. This was not reported on in our original assessment as the district plan rural zone noise limits only apply at the notional boundary of dwellings.

The highest predicted daytime noise rating level at the notional boundary of the dwelling at [REDACTED] is 46 dB L<sub>A10</sub>. We consider that the noise effects for the occupants at [REDACTED] will be reasonable.

d. Noise encroachment on vacant land at [REDACTED]

Our acoustic assessment identifies that the proposed northern solar farm could be vulnerable to encroachment if a dwelling is constructed on the vacant land within 40m from the east boundary of the northern solar farm in line with the closest inverters.

The noise level contours show the potential risk of encroachment is likely to be very low.

Mr Slattery asks, *“What effect does this noise encroachment have on the ability to develop the rear block of [REDACTED] in the future?”*

This is more of a planning/legal question, but our understanding is that, in the unlikely event that a dwelling was legally established within 40m from the east boundary of the northern solar farm and the dwelling was in line with the closest inverters, then the solar farm would potentially be required to mitigate the noise levels to ensure compliance with the consented noise limits. The required noise reduction could readily be achieved with an acoustically effective fence.

e. noise and vibration effects on horses

The closest piling work to the stables at [REDACTED] is 25m. We are not experts in animal health or wellbeing, but if the closest stables were occupied by horses at the time of the closest piling then there may be a risk that the horses could be adversely affected. Our experience is that horses are not averse to loud noises, but can be startled by loud noises if the source of the noise is not obvious. We recommend that the applicant endeavour to schedule the closest piling work to the stables at times when stables are not occupied. This will involve a high level of advanced communication and engagement with the stables management at [REDACTED]

	<p>It is my experience that a significant number of noisy infrastructure, rural and industrial activities occur throughout New Zealand on land that is directly abutting or adjacent to productive rural land and without any issue. It is my experience that horses or livestock is often present in paddocks next to much noisier activities such as major roads, airports, large factories and other industry without any issues arising.</p> <p><b>f. What effect will the vibrations have on the structure of the pool at [REDACTED]</b></p> <p>The pool at [REDACTED] is located 45m from the closest solar panels and area where the piling rig will operate. We do not expect there to be any risk of structural damage.</p> <p><b>g. Construction noise and vibration effects</b></p> <p>Mr Slattery identifies the noise exceedances during the tree works for the three receivers 6 &amp; [REDACTED] and [REDACTED]</p> <p>These very short term exceedances during the use of chainsaws and chippers required for tree removal have been addressed in our construction noise assessment for the Retirement Village.</p>
Raised concerns around the groundwater table	<p>Monitored shallow groundwater levels have been updated in the attached WGA memo included as <b>Attachment 4</b>.</p> <p>WGA confirm that the new water supply bore had a bore consent for drilling and construction. The effects of the proposed abstraction on nearby bores are low to negligible due to the take being from a deep confined aquifer.</p> <p>Dust suppression water will be from the new production bore. The assessment on the effects on surface water was carried out. Given the size of the take and the deep bore effects on the Piako Catchment are not expected.</p> <p>The map shows bores registered on the WRC database at the time of the application. WRC have checked if there are any new bores on the database and found one additional bore which has been considered as less than minor effects. This is a relatively small, proposed take and standard assessment for the size and depth of the take.</p>

	<p>The stormwater system has been modified due to the higher groundwater levels. The WGA memo covers the updated assessment for the wastewater application to land. Shallow groundwater (from a 16 m deep bore) was tested at the onsite dairy shed and found to have nitrate-nitrogen concentrations over drinking water standards. Therefore, drinking the shallow groundwater is not recommended. Never the less the dewatering effects are not expected to extend to the north to affect Mr Slatterly's bore.</p>
Concerns around the sub soil classifications and potential for lateral spread.	<p>A significant portion of the Waikato region is underlain by soils classified as Class D. Land development (as proposed for this Ashbourne development), as well as more complicated and critical council infrastructure and transport infrastructure projects are routinely designed and constructed for similar class D sites.</p> <p>Refer to Sections 6.7 &amp; 7.4 of the updated GIR issued on the 17th November 2025, referenced HAM2023-0124AI Rev 3 for more detail on settlement risk and mitigation options. Refer to Sections 6.5 and 7.3 of the updated GIR for more detail on lateral spread risk and mitigation options for the different development blocks. Based on this, risk of lateral spreading is negligible under IL2 seismic conditions for the Residential Area, minimal under IL2 seismic conditions for the Retirement Living Area, negligible under IL1 seismic conditions for the Northern Solar Farm, low to moderate under IL1 seismic conditions for the Southern Solar Farm. Ground deformation as a result of lateral spreading near the proposed Greenway is calculated to be in the order of 30mm under ULS seismic conditions. Foundation options such as waffle slab foundations or other structurally designed systems can account for these seismic-induced displacements, which is commonly done for similar development in this region and wider New Zealand.</p>
Wetland and Esplanade Planting and retained vegetation	<p>Esplanade planting is illustrated on the updated Landscape Drawings provided by Greenwood Associates as <b>Attachment 17</b>.</p> <p>Vegetation has been retained where feasible, however it is noted that the existing vegetation on site is predominantly sporadic exotic trees with limited value. The proposal will include substantial planting that will reflect the surrounding character of other urban developments, including the provision of one specimen tree per Lot in addition to proposed street tree planting. The Retirement Village additionally includes a substantial planting palette that will result in a net positive benefit to the surrounding environment</p>
Spine Road Alignment	Engagement has been undertaken with property owners at 129, 129A, and [REDACTED] as reflected in their submitted comments.

		The ideal outcome from the Developer's perspective is to purchase this driveway from adjacent landowners and create new vehicle crossings for these dwellings onto the Spine Road, enabling a straight alignment. However, the current alignment of the Spine Road is fit for purpose and considered appropriate for implementation should these agreements not be forthcoming. Any connection into Chestnut Lane would explicitly be with the agreement of the landowners.
	NPS-HPL matters	A response memorandum has been prepared in relation to NPS-HPL matters raised by MPDC, and is included as <b>Attachment 3</b> .

## 9.0 Response to Submission 35 - [REDACTED]

Table 5: [REDACTED] Comment

No.	Summary of Comment	Applicant Response
35.	3.4 Concerns about adverse environmental effects on the Waitoa River and ecosystem, and that application does not adequately address these effects, particularly relating to water discharges	<p>The effects of stormwater on the Waitoa River quality are expected to be low as concluded in the EclA as the Waitoa River is currently adversely impacted by organic pollutant or nutrient enrichment. The stormwater design incorporates treatment of runoff prior to discharge into the Waitoa River in accordance with TP10 / GD01 / Waikato Stormwater Management Guidelines (WRC Technical Report 2020/07). Therefore, the effects of stormwater on the Waitoa River and the native species inhabiting the river are expected to be no greater than the current water quality and possibly an improvement due to the removal of high nutrient runoff from farm activities. The Department of Conservation's comments state <i>"the department considers effects on the Waitoa River to be low, as the proposed mitigation measures are likely to reduce the effects of nutrient and sediment runoff."</i></p> <p>The proposal includes water treatment devices to Regional and National standards as best practice with review by MPDC and WRC. These devices will achieve better environmental outcomes than the existing land use.</p>

	3.6 Development will compromise ability to sustainably manage landholding, and will have a detrimental economic effect on farm business	Concern is noted, however there is no evidence that the proposal will result in adverse effects on the management of landholding, particularly when noting the separation distance between [REDACTED] and any sensitive receivers.
	4.4-4.5 – Flood events will exacerbate adverse effects from additional discharges into the Waitoa River, negatively effecting landholding in terms of water table and flood effects	Refer to memorandum prepared by Maven Associates included as <b>Attachment 9</b> along with the updated Stormwater Management Plan (SMP) ( <b>Attachment 18</b> ) with additional ground water modelling and design updates
	4.6 – 4.8 Concerned that water discharges will increase contaminants in the waterway, threatening native species	<b>Maven</b> to address contaminants, <b>Ecological Solutions</b> to address effects
	4.10 – Pond system proposed of major concern, particularly in failure of this system causing a major flood event	Refer to memorandum prepared by Maven Associates included as <b>Attachment 9</b> along with the updated Stormwater Management Plan (SMP) ( <b>Attachment 18</b> ) with additional ground water modelling and design updates
	4.13 – NPS-HPL	Please refer to response in Section 16.0 below and the NPS-HPL Memo included as <b>Attachment 3</b> .
	4.14 – Cumulative effects when combined to existing subdivision developments along Station Road	Please refer to the response to Minute 2 addressing cumulative effects.

## 10.0 Response to Submission 37 - [REDACTED]

No.	Summary of Comment	Applicant Response
37.	Proposed development will compromise the ongoing viability of the farming operation, including from quality of water going into the Waitoa River	As set out within the Engineering responses included as <b>Attachment 9</b> along with the updated Stormwater Management Plan (SMP) ( <b>Attachment 18</b> ) with additional ground water modelling and design updates, there is no evidence to suggest that the quality of water in the Waitoa will decrease, particularly noting that the existing discharge appears to be untreated farm runoff.

	<p>The proposed development is located some distance from this adjoining property, being bordered by a vacant lot and southern solar farm. It is not considered that the development will have any adverse effects on the ongoing operation of the farm.</p>
<p>Flood Risk – specifically discharge into the Waitoa River adversely impacting neighbouring land</p>	<p>Refer to memorandum prepared by Maven Associates included as <b>Attachment 9</b> along with the updated Stormwater Management Plan (SMP) (<b>Attachment 18</b>) with additional ground water modelling and design updates</p> <p>Stormwater and flooding effects to this area is negligible as the Greenway hold back flood water to this area. A technical increase of 20mm has been identified in the flood modelling for a very short section from the Greenway outlet to Station Rd. This 20mm is not from the development but that the post development flood modelling includes 100yrs of climate change with increased rainfall intensities.</p>
<p>Engineering peer review included as Appendix 3 to the submission</p>	<p>Unfortunately, we must note that Sue Southerwood did not reach out to Maven to inform us that this review was occurring or pose any questions or clarifications during the process before producing this review document. When a review of another Engineers work is undertaken the reviewer has an ethical obligation to consult with the designer as outlined Engineering NZ practice note "Peer review practice note version 2 page 9 and 10.</p> <p>This process is necessary to ensure that reviewers comments are informed and not simply a round of questions that could easily have been refined down to potentially nothing with engagement as outlined by Engineering NZ. This is of particular importance in this context where there is a large volume of information to process with significant background like extensive discussions with MPDC and WDC around stormwater management.</p> <p>The reviewers' comments should therefore be taken in this context,</p>

	<p><u>Groundwater</u></p> <p>Refer Maven s53 Technical Response Memorandum (<b>Attachment 9</b>) along with the updated Stormwater Management Plan (SMP) (<b>Attachment 18</b>) with additional ground water modelling and design updates reflecting the higher water table, along with the memo prepared by WGA and included as <b>Attachment 4</b>.</p> <p><u>Diversion of Catchment Flows and Flood Modelling</u></p> <p>GIS is very inaccurate. Maven has undertaken detailed pre and post development flood modelling, as set out within their responses.</p> <p>Stormwater and flooding effects to this area is negligible as the Greenway hold back flood water to this area. A technical increase of 20mm has been identified in the flood modelling for a very short section from the Greenway outlet to Station Rd. This 20mm is not from the development but that the post development flood modelling includes 100yrs of climate change with increased rainfall intensities.</p> <p><u>Shallow Basins</u></p> <p>The SMP already includes mitigation and sizing for appropriate events at each relevant device.</p> <p><u>Greenway Discharge and Effect on Van Heuven Property</u></p> <p>Stormwater and flooding to this area will be reduced as a result of Ashournes proposed stormwater management devices.</p> <ul style="list-style-type: none"> <li>• The flood modelling for a 1% AEP (100-year ARI) climate change event and the theoretical 20mm increase in Waitoa River is a sensitivity analysis that includes several layers of conservatism such as, zero soakage, all pipe networks being blocked and climate change adjustments (RCP8.5).</li> </ul>
--	---

	<ul style="list-style-type: none"> <li>• The 20mm increase is limited to the Waitoa River alone. Since the Waitoa River carries a large volume of water, this increase is negligible and falls within the natural fluctuation of water levels during major storm events.</li> <li>• The model currently assumes that 127ha of land upstream of the southern solar farm (see Existing Catchment Plan) is discharging into our site, where it ponds and then gradually discharges through existing farm drains into the Waitoa River.</li> <li>• As mentioned in our greenway memo, several farm drains south of our development site have not been identified due to the limited accuracy of Lidar data. These may well be cut-off drains that direct flows into the Waitoa River upstream of our site, potentially affecting water levels in both scenarios, however for the purpose of conservatism it has been assumed flows continue north to the greenway.</li> <li>• For a 10-year event or less, catchments falling to the greenway will be managed via soakage within the residential development. The retirement village will discharge flows at 80% pre-development flows (without climate change) with extended detention providing for stream channel erosion control for smaller events</li> </ul> <p><u>Hydrogeology</u></p> <p>Please refer to memorandum prepared by WGA included as <b>Attachment 4</b>.</p> <p><u>Flood Modelling</u></p> <p>As per response above, stormwater modelling has been undertaken in with many levels of conservatism and the resulting effects are negligible. Refer to the SMP which details the modelling completed. Intermediate events will discharge at less than 80% pre-development flows.</p> <p>Stormwater and flooding to this area will be reduced as a result of Ashournes proposed stormwater management devices</p>
--	--

	<p><u>Other</u></p> <p>As per above, stormwater has been designed to release at less than 80% pre-development flows for 100 and 10-year ARI + cc events.</p> <p>For a 10-year event or less, catchments falling to the greenway will be managed via soakage within the residential development. The retirement village will discharge flows at 80% pre-development flows (without climate change) with extended detention providing for stream channel erosion control for smaller events.</p>
Reverse Sensitivity Effects on existing farming operation.	The proposed development is located some distance from this adjoining property, being bordered by a vacant lot and southern solar farm. It is not considered that the development will have any reverse sensitivity effects will arise.

## 11.0 Response to Submission 42 - Eldonwood Limited

No.	Summary of Comment	Applicant Response
42.	Noted previous consent to the Project and the Drainage Plan (including wastewater pipes to be laid under the southeastern portion of Eldonwood). Reiterate support of the proposal and wastewater plan.	Noted.
	Summarises the Structure of Founding Member Rights of Eldonwood Limited, and confirm that should any objection be raised by other members of the Eldonwood Residents Association, that Founding Member rights will be exercised to sever the Property from the Residents Association	Refer to Legal Memorandum included as <b>Attachment 1</b>
	Understand that Residents do not wish public access to be provided to the Eldonwood Development, and have agreed to co-ordinate this post-settlement to limit access to the laying of pipes and no other purpose	No public access is proposed, and the Applicant is willing to discuss this further.

## 12.0 Response to Submission 43 - [REDACTED]

No.	Summary of Comment	Applicant Response
43.	Stormwater pond and flooding – particularly emergency spillway and exacerbation of flooding effects on adjacent properties. Reference made to Barr and Harris Report.	<p>Refer to above response to Station 143 Limited and Begovich Investments, Highgrove Ave and Maven s53 Technical Response Memorandum (Attachment 9) along with the updated Stormwater Management Plan (SMP) (Attachment 18) with additional ground water modelling and design updates.</p> <p>Stormwater and flooding to this area will be reduced as a result of Ashbournes proposed stormwater management devices. Wetland D will detain large storm events and discharge at a controlled rate which will be a significant improvement from the current SW flows and flooding</p>
	Odour issues from stormwater pond, particularly stagnant water and decomposing organic matter from poor water circulation and vegetation decay that will be difficult, if not impossible, to remedy.	<p>Wetlands and basins are constructed to Regional and National standard which are developed to ensure appropriate vegetation selection with input from relevant landscape specialists to ensure such issues do not occur. Maven has been involved in the construction of hundreds of similar devices without issue.</p>
	Construction effects, including dust and noise generation, including dust settling on rooftops posing a contamination risk to drinking water supply	<p>Noise, Traffic, Dust, and Environmental management are key requirements for successful delivery. Strict compliance in accordance with the approved CMP will include monitoring from regional and district councils to ensure conditions are upheld.</p> <p>Regarding noise effects, we note that the site is currently occupied by a farm shed which is set back 26m from the boundary of the site. The highest predicted noise level during the earthworks is 69 dB L<sub>A10</sub>. This level of noise will only be experienced when the earthworks are undertaken on the site boundary, and falls within the permitted noise levels allowed by MPDC.</p>
	Construction traffic along western boundary during Stage 1 construction, being the main site access route. Request traffic management plan	<p>A Construction Traffic Management Plan will be prepared prior to the commencement of construction. A draft CTMP was supplied with the substantive application.</p>

Unauthorised access of the property at 5 Odlum Drive has been observed, and surveillance cameras will be installed and legal action pursued if any further unauthorised access	The Developer is not aware of this occurrence. The developer does not require access to 5 Odlum Drive, and if any is required, prior permission would be sought.
Lack of communication and consultation	A letter drop was undertaken, and email addresses and phone numbers of relevant consultants was included. Due to the scale and nature of surrounding properties, it was not practical to undertake door knocking exercises for all neighbours.
Inaccurate inclusion of Odlum Drive in the proposed development plans	Unity can confirm that 5 Odlum Drive is <u>not</u> included in the proposed Ashbourne development.
Impact on health and wellbeing	Noted.
Does not support proposed ponding on their boundary or the proposed cycle lane	Stormwater and flooding to this area will be reduced as a result of Ashbournes proposed stormwater management devices. Wetland D will detain large storm events and discharge at a controlled rate which will be a significant improvement from the current SW flows and flooding.  In relation to the cycle lane, a shared path upgrade is proposed along Station Road, but no other cycle lane is proposed within proximity of this adjoining property.

## 13.0 Response Submission 48 - Eldonwood Residents Association

No.	Summary of Comment	Applicant Response
48.	Incompatibility with existing zoning and community character, including the density and nature of the development not being in keeping with the character of the surrounding area.	The overall development — including the proposed lot sizes — is still considered to represent a relatively low-density outcome from an urban design perspective.
	Construction works effect on visual amenity, and noise and vibration effects	Mitigation measures are proposed where feasible to avoid visual amenity impacts on adjoining properties. Earthworks will be temporary in nature, with

	<p>the developer committing to providing a 2.0m wide landscape buffer in the first planting season following the completion of relevant earthworks stages.</p> <p>With regard to potential noise effects, it is noted that an Acoustic Assessment was undertaken and submitted with the application documents at Appendix 5K. This assessment found that noise levels would be within permitted levels for the majority of the properties within Eldonwood, with the exception of [REDACTED] which will be subject to a limited exceedance of 2dB. While construction noise is undesirable, it is a necessary feature of developments of this scale.</p> <p>Mitigation measures are proposed where applicable, including temporary acoustic barriers. All adjoining residents will be notified prior to commencement of works.</p>
<p>Proposed planting along Eldonwood boundary is insufficient in relation to amenity effects and separation</p>	<p>A 2.0-metre-wide buffer planting is now proposed for this area to be established immediately following relevant earthworks stages.</p> <p>The new planting within this 2.0-metre buffer strip will serve as supplementary mitigation, addressing minor gaps and reinforcing the existing landscape rather than acting as the primary screen. Given the maturity and density of the current vegetation and the clearly defined property boundaries, a 2.0-metre-wide buffer is sufficient to provide additional screening and landscape continuity without compromising the functionality and liveability of adjoining properties.</p> <p>A proposed 2-metre wide buffer provides suitable space to meet the visual needs of this boundary. A 2-metre width buffer is adequate and would allow for two planting rows (0.802 plants per m<sup>2</sup> using triangular multiplier) to achieve the intended amenity and screening outcomes, consistent with other boundaries adjoining existing rural and rural-residential properties. Most of the selected species (<i>Cordyline australis</i>, <i>Kunzea ericooides</i>, <i>Leptospermum scoparium</i>, <i>Myrsine australis</i>, <i>Phormium cookianum</i>, <i>Pittosporum crassifolium</i>, <i>Knightia excelsa</i> and <i>Sophora microphylla</i>) should reach a strong level of maturity within five to seven years, developing fuller canopies and</p>

	<p>stronger root systems that deliver the intended amenity, screening, and ecological benefits</p> <p>Detailed planting specifications will be prepared and confirmed during the Project's detailed design stage, as required by consent conditions. The establishment of the buffer planting will follow those conditions, including any consent notices that set out maintenance requirements.</p>
Lack of infrastructure capacity, including water supply, wastewater, stormwater, and roads and traffic	<p>Refer to Maven s53 Technical Response Memorandum and response to Peakedale Neighbours item 1. above. The Ashbourne development assists with the long-term infrastructure costs by paying full development contributions and upgrade costs. The Water supply has been tested and confirmed by MPDC modelling that it is suitable to connect. Wastewater connection points and upgrade costs have been agreed and are detailed in Response Memo.</p> <p>Refer to Supporting documentation, including MPDC Comment Annexures I and K and the draft PDA, provide detailed technical feedback, financial principles, and formal agreements with MPDC</p>
Fails to demonstrate regional or national economic benefits	Please refer to response within Section 17.0 below and the Economic memo included as <b>Attachment 7</b>
Accessways and connectivity – support the removal of pedestrian pathways into Eldonwood, and request condition to ensure this	Pedestrian pathway connections have been removed from the drawing set.
Intend to void the assignment of Founding Member Rights to the developer.	Refer to the Legal Memorandum included as <b>Attachment 1</b> .
Notes similarities between the Ashbourne project and the Delmore project, including highlighting specific provisions of the draft decision	Noted, however not considered relevant to the assessment of Ashbourne.
<p>Whilst the Association re-iterates its opposition to the application, should the Panel choose to approve the Ashbourne Development, the Association would request the following conditions be imposed:</p> <ol style="list-style-type: none"> <li>1. Formal surrender of all rights-of-way and parking easements over Eldonwood's private roads;</li> </ol>	<p>In respect to Eldonwood concerns and specific requests, the developer has the following comments:</p> <ol style="list-style-type: none"> <li>1. Ref: Legal Memo on Surrender of Easements.</li> <li>2. Unity have committed to remove connectivity to Eldonwood. Please refer to update plans.</li> </ol>

<p>2. Removal of all proposed connectivity with Eldonwood, with any connectivity whatsoever to only be with the express consent of the Association;</p> <p>3. Surrender of the rights purportedly assigned in the Deed of assignment dated 31 October 2024;</p> <p>4. Prohibition of topsoil or clay storage along Eldonwood boundaries;</p> <p>5. Implementation of a 10 metre wide green buffer zone along all shared boundaries, including:</p> <ul style="list-style-type: none"> <li>• Mature native plantings at 900 mm centres;</li> <li>• 100 mm bark mulch cover;</li> <li>• Full irrigation system;</li> <li>• Landscape Management Plan outlining maintenance obligations in perpetuity for the buffer zone; and</li> <li>• Consent notices registered on Ashbourne titles confirming these obligations.</li> </ul> <p>6. The provision of comprehensive hydrological studies evidence/data and detailed mitigation measures to address flooding and groundwater development impacts for surrounding properties, including Eldonwood.</p> <p>7. Independent peer reviews of all technical reports, including stormwater, wastewater and geotechnical assessments.</p>	<p>3. Ref: Legal response to Surrender Deed of Assignment Rights. Unity uphold the DoA. This is a private deed is between Eldonwood Limited and the developer.</p> <p>4. Refer Maven Plans/Management Plan.</p> <p>5. Ref: Greenwoods Landscape Buffer. Unity will be implementing a 2m boundary buffer planting along the full contiguous length of the Eldonwood properties. This will be planted in the planting season following earthworks. Refer Greenwoods Landscape plans for details. A consent notice to be placed on adjacent titles to ensure this is maintained.</p> <p>6. Updated responses have been provided on Hydrogeological matters (<a href="#">Attachment 5</a>) and Engineering (<a href="#">Attachments 9-14</a>)</p> <p>Unity undertook engagement with Joanne Morgan, on behalf of the Eldonwood Residents Association. Joanne is the chair of the Eldonwood Residents Association, and Unity were informed via Joanne that she represented the collective landowners within Eldonwood</p>
--	--

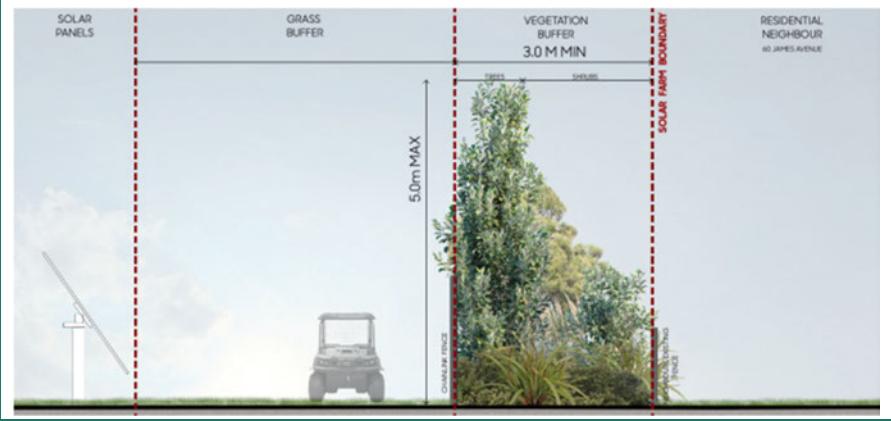
## 14.0 Solar Farms

No.	Summary of Comment	Applicant Response
6.	Locating solar farms in proximity to residential area is inappropriate.	<u>Rationale for inclusion of solar farms</u>
10.		
13.		
15.		
24.		

25. 31. 32.		<p>The Matamata Project will produce clean electrical energy and offset electricity produced elsewhere in New Zealand using fossil fuels, producing enough energy to power approximately 6,000 to 7,000 homes per year. The project will contribute to NZ's goal to become carbon neutral.</p> <p>The solar farms will send the energy it creates directly into the power grid, adding much needed diversity into the grid at a time where demand for electricity is high, and will only continue to grow. The output profile from a solar farm is weighted towards daytime summer and aligns particularly well with electricity consumption in the Matamata area.</p> <p>This project directly aligns with Aotearoa's emissions reduction strategy by providing investment in renewable electricity generation to assist Aotearoa's transition to a low emissions future and meet its climate change targets.</p> <p>This project is being designed to meet the definition of an "agrivoltaic" project or "dual -use" solar farm, a facility that is designed to continue the agricultural use of the property at the same time as harvesting power via the solar panels. In this case sheep will be grazed amongst the solar panels.</p> <p><u>Proximity to Residential Uses</u></p> <p>Solar farms, when designed with appropriate mitigation measures, are generally considered a compatible and low-impact activity alongside residential areas. Unlike many traditional rural or industrial uses, solar generation produces no emissions, odour, vibration, or dust, and operates with minimal noise. The incorporation of setbacks, landscape screening, and sensitive array layout ensures that visual effects are appropriately managed and that residential amenity is maintained. Once constructed, solar farms generate very low levels of traffic, require no exterior lighting, and involve limited on-site activity. As such, they represent one of the least intrusive forms of infrastructure that can adjoin residential properties. With these design measures in place, solar farms can be regarded as an appropriate and well-integrated neighbouring land use.</p>
6. 31.	Concerns around the potential glint and glare effects of the solar farm, including for aviation operations and residential properties	<u>Glare Effects</u>

48.	<p>A comprehensive glint and glare assessment has been undertaken for the proposed Matamata Ashbourne Northern and Southern solar farms, confirming that no residential properties—or any other assessed receptors—will experience any glint or glare impacts. Using the advanced ForgeSolar modelling tool, the studies evaluated multiple viewing points across surrounding homes, local roads, and nearby flight paths. The absence of glare risk is attributed to the very low reflectivity of modern anti-reflective PV panels and the inclusion of a 2.5 m vegetative buffer around the sites. Overall, the assessments concluded that no adverse glare effects will occur. Refer glint and glare assessment documents “Matamata Ashbourne Northern SF Glint and Glare Assessment” and “Matamata Ashbourne Southern SF Glint and Glare Assessment” dated 18/10/2024.</p> <p><u>Aviation Safety</u></p> <p>Solar farms are commonly located near airports (refer Kōwhai Park – Christchurch Airport – 170MW, Te Matakupenga – New Plymouth Airport – 10MW). Modern solar panels are designed to absorb rather than reflect sunlight, producing extremely low glare that fully meets stringent aviation safety standards. Comprehensive glare modelling and operational assessments consistently show that solar installations do not interfere with pilot visibility, aircraft navigation, or radar systems, making them compatible with aviation operations even at close range. Aviation safety for the proposed Matamata Northern and Southern solar farms has been assessed using FAA-approved glare modelling tool ForgeSolar, which concluded that there would be no significant glint or glare effects. Refer glint and glare assessment documents “Matamata Ashbourne Northern SF Glint and Glare Assessment” and “Matamata Ashbourne Southern SF Glint and Glare Assessment” dated 18/10/2024.</p>	
6.	Feasibility of connection to substation	<p>The Proposed solar farms are community-scale developments, they will connect to the Powerco network at the distribution level. Initial discussions with Powerco, including high-level planning assessments, have confirmed the feasibility of connecting both sites to their network. The solar farms will be integrated via the Browne Street Substation, with the Northern Solar Farm expected to connect through a dedicated 11 kV feeder, while the Southern Solar Farm is proposed to connect via an in-and-out arrangement on the Browne Street 33 kV feeder.</p>

6.	Queries how end of life will be managed and site returned to productive use.	<p>Decommissioning and reinstatement are mandatory conditions of resource consents. After the productive lifespan of the solar farm, which is typically approximately 30 years, decommissioning becomes necessary due to several factors including reduced efficiency of solar modules, decreased energy production, technological advancements, and potential repurposing of the land. To handle this process effectively and responsibly, the following actions will be undertaken:</p> <ul style="list-style-type: none"> <li>• Efficient Decommissioning: Develop a clear plan for safe removal of solar panels and infrastructure, including dismantling structures and restoring the land for sustainable use.</li> <li>• Reuse of Components: Explore opportunities to refurbish and reuse functional components to extend their lifecycle and minimize resource use.</li> <li>• Environmental Considerations: Prioritise environmental protection by managing contaminants, restoring habitats, and preserving biodiversity.</li> <li>• Community Engagement: Involve local communities in transparent communication about project timelines, environmental impacts, and land repurposing plans to address community needs and concerns.</li> </ul>
6.	Query why solar farms are included but not rooftop solar	<p>Rooftop solar alone cannot provide the scale or reliability required for meaningful grid-connected renewable generation. In contrast, the two solar farms (both trackable) offer greater resilience, diversity of output, improved grid stability, and increased local renewable generation capacity. While battery storage can be beneficial, it is not essential for solar to contribute effectively to the grid, particularly in New Zealand where the hydro system already provides significant natural storage.</p>
14. 31.	Visual impact of the solar farms on adjacent residential properties and surrounding rural character. Notes that the landscape buffer will not be fully established for 10-15 years, which is too long.	<p>We acknowledge the concerns raised by neighbours regarding potential visual effects, including glint and glare from the solar panels and the visibility of the chain-link security fence during the establishment period. A minimum 3.0-metre wide buffer is proposed and is expected to reach about 2.5 metres height after five years.</p> <p>At that point it will provide sufficient mitigation to screen a single-storey home, which aligns with the surrounding residential context. Full maturity of around 5</p>

	<p>metres is expected after ten years, providing strong and consistent screening of the solar panels and fencing.</p> <p>Refer to the updated solar farm Landscape Drawing package included as <b>Attachment 23</b>. A snip below shows the typical boundary 3.0m Wide buffer treatment.</p> 
14. Electromagnetic Fields and potential health implications	<p>There are no radiofrequency, electrical field or magnetic effects associated with solar farms that would be in excess of NZ guidelines for public or workers. The National Policy Statement and National Environmental Standard on Electricity Transmission are instruments under the Resource Management Act to manage the environmental effects associated with electricity transmission. These apply the 1998 EMF health protection guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) to manage EMF. The ICNIRP re-issued their guidelines in 2010, revising the public exposure limit for magnetic field from 100 to 200 <math>\mu</math>T (micro tesla) and NZ Ministry of Health recommend the revised limit. Based on experience from similar installations it is expected that the solar farm equipment will have a minimal/negligible effect on EMF readings at the boundary and that the actual EMF readings will be significantly below the 200 <math>\mu</math>T public limit.</p>

		<p>Additionally, equipment with potential to generate EMF's will be positioned away from the property boundaries.</p>
15. 17.	Concerned about potential fire risk of the solar farms	<p>As there are no combustible materials on site and the risk of fire is minimal. The equipment will be installed by a qualified solar installer in accordance with applicable AS/NZS standards for safe electrical installations and solar installations:</p> <ul style="list-style-type: none"> <li>• AS/NZS 5033:2021 Installation and safety requirements for photovoltaic (PV) arrays</li> <li>• AS/NZS 3000:2018 Electrical installations - Known as the Australian/New Zealand Wiring Rules</li> </ul> <p>Programmed maintenance will include regular vegetation control to minimise fire risk. Additionally, Fire and Emergency New Zealand (FENZ) has been consulted on the proposed solar farm, and their design recommendations have been incorporated into the project.</p>
15. 31.	Query the noise effects from the solar farm, including once operational.	<p>Styles Group note that the MVPs and inverters have been located to achieve ample separation distance to all adjoining dwellings, including [REDACTED]</p> <p>Specifically for the dwelling at [REDACTED] is approximately 130m from the closest invertor and 180m from the closest MVPS, and the submitted noise assessment demonstrates that operational noise emissions can comply with the noise performance standards at all surrounding properties, including [REDACTED]</p> <p>[REDACTED]</p> <p>More generally, it is noted that the only exceedances to permitted noise standards arise during the construction of the solar farms, which will be temporary and appropriately mitigated. Once operational, the solar farms comply with all required noise levels.</p> <p>We are not aware of any schools located within audible distance of either the north or south solar farms.</p>
17. 19.	Solar Farms – toxic materials and leachates from panels.	<p>Modern solar panels are fully sealed units designed to prevent any release of materials into the environment. The components—such as silicon cells, glass, aluminium framing, and encapsulated wiring—are enclosed within durable, weatherproof layers that do not leach chemicals into the soil or groundwater. Extensive research confirms that solar panels are inert in normal operating</p>

		conditions, with no measurable discharge of toxins, making them safe for use on agricultural land and within rural environments.
18.	Inappropriate use of productive rural land.	<p>Solar installations located on highly productive land do not result in a permanent loss of soil capability, as the panels and associated infrastructure can be fully removed at the end of their operational life, enabling the land to return to its original agricultural use.</p> <p>During operation, grazing capacity is expected to temporarily reduce due to shading from the panels and the footprint of supporting infrastructure. However, the use of tilting panels reduces shading by approximately half, allowing pasture to continue growing both beneath and between panel rows. Research, including recent studies from Massey University, indicates that although pasture directly under panels may experience reduced growth, pasture in the inter-row areas can show significant increases due to sheltering effects, potentially compensating for losses elsewhere. Consequently, the long-term productive versatility of the land remains preserved, and in some cases, continued grazing beneath panels may even enhance soil carbon levels and overall soil health over the lifetime of the solar installation.</p> <p>Further, the Matamata Piako District Plan permits solar farms to be located on rural land, and the activity is therefore specifically provided for in this location.</p>
18.	Stock management concerns for northern solar farm	Stock management within solar farm environments is typically structured to minimise on-site infrastructure while maintaining effective animal husbandry. In comparable projects, landowners or grazing tenants generally undertake all intensive stock-management activities—such as drenching, yarding, drafting, and health treatments—on land they already operate outside the solar footprint. The land within the solar array is used primarily for grazing, with stock moving on and off the site as required for management tasks. For this project, a similar approach is anticipated: the solar farm land would be leased to a stockholder who utilises the grazing rights but carries out all animal-handling operations at their existing off-site facilities. This avoids the need to construct yards, hard-stand areas, or other structures within the solar farm, which would otherwise reduce panel capacity and generation output. Sheep grazing under solar arrays is now well-

		established in New Zealand and is recognised as a practical and sustainable land-use combination.
18.	Water supply to northern solar farm	<p>A trickle feed supply has been proposed from the existing 25mm MDPE supply which will be to only fill the fire tanks initially and if ever emptied. This will not effect any other users.</p> <p>The farm does currently provide stock water via the main farm supply. This will be protected and retained to service future stock.</p> <p>New water troughs will be provided as shown on plans for livestock.</p> <p>Water can be delivered by truck for any drought conditions.</p>
18.	Do not agree with the developers reasoning behind rezoning and subdividing the 2 proposed lots 8 and 9 adjacent to [REDACTED] which fall within the highly productive rural zoned northern solar farm.	<p>The application does not seek to rezone the site; rather, it seeks a concurrent subdivision consent, and the underlying zoning will remain unchanged. The proposed subdivision of Lots 8 and 9 is intended to establish a logical boundary and provide a robust, continuous buffer along the southern interface of the northern solar farm. The layout and configuration of Lots 8 and 9 have been purposefully designed to be compatible with the lot sizes and characteristics of the Highgrove properties located across the road. This approach assists in appropriately managing potential effects on the existing character and amenity of neighbouring and surrounding properties along Station Road, including [REDACTED] [REDACTED] In addition, the proposal includes the identification of specific building platforms on Lots 8 and 9. These platforms have been selected to ensure the careful management of views and outlooks from Station Road, further reducing potential visual and amenity effects for residents in the immediate area.</p>
18.	Commencement of southern solar farm activity	<p>The current timing for the Southern Solar Farm is based on allowing Residential Stage 4 to be completed, to provide the power cable route to the Southern Solar Farm boundary.</p> <p>Should opportunities to deliver the Southern Solar Farm earlier be possible, these would be explored.</p>

18. Concern over the height of trees in the proposed buffer planting at the boundaries between property [REDACTED] and the northern solar farm. The concern relates to trees reaching a height that they will cast shadows over Ms Jone's Residence and outdoor living areas as the proposed buffer planting sits to the north of Ms Jone's dwelling.	<p>The Landscaping Package has been updated (refer Attachment 23) to reduce the number of specimen trees that could have case shade over the north-facing private open space at [REDACTED]. The proposed buffer planting remains and, given the site conditions, is expected to reach an established height of around 5.0 metres around 10 years.</p> <p>Refer to the typical boundary 7.0m Wide buffer treatment to [REDACTED] boundary, included below and within Attachment 23.</p>
	
18. Inconsistencies on transformer placements and locations of large trees in relation to crossings in plans	Detailed electrical design will determine the final locations but district plan requirements will be met and are easily enforced, ie noise limits. Landscape screening plans have been provided so the transformers will not be viewable.

## 15.0 Unsuitability of land – Groundwater, Liquefaction, Stormwater, and Flooding

No. Summary of Comment	Applicant Response
------------------------	--------------------

3.	The site is subject to a high winter groundwater table, and commenters raised concerns that the proposed stormwater management would exacerbate existing groundwater and flooding issues. Issues were noted within Station Road, Peakedale, and Highgrove.	<p><u>Stormwater</u></p> <p>Refer to Maven s53 Technical Response Memorandum (<b>Attachment 9</b>) along with the updated Stormwater Management Plan (SMP) (<b>Attachment 18</b>) with additional ground water modelling and design updates.</p> <p>Stormwater and flooding will be reduced as a result of Ashbourne's proposed stormwater management devices, including within Station Road.</p> <p><u>Groundwater</u></p> <p>As outlined in the WGA memo included as <b>Attachment 4</b> the proposed stormwater system and greenway will reduce groundwater recharge and seasonal high groundwater levels. As noted above, the re-designed stormwater network has improved outcomes and takes into account the higher than typical winter groundwater levels that were noted on site during further investigations.</p>
13.	Several commenters noted that the land has liquefaction risk and is not suitable for development.	<p>The calculated liquefaction-induced vertical settlements for IL2 structures are presented in Section 6.4 of the updated GIR. The calculated liquefaction-induced vertical settlements are not uncommon for the wider area. Mitigation solutions, which are widely used in New Zealand for similar development, exist to mitigate liquefaction effects. Mitigation solutions include waffle slab foundations, designing superstructures to take the settlement into account.</p> <p>Refer to the updated GIR issued on the 17th November 2025, referenced HAM2023-0124AI Rev 3 for more detail (included as <b>Attachment 5</b>).</p>
15.	In relation to stormwater and flooding, commentors raised concerns that the Environment Waikato Board Drain through Lot 2 DP 491699 via culvert under Station Road will be impacted by the development.	<p>Refer to above response to Station 143 Limited and Begovich Investments, Highgrove Ave and Maven s53 Technical Response Memorandum (<b>Attachment 9</b>) along with the updated Stormwater Management Plan (SMP) (<b>Attachment 18</b>) with additional ground water modelling and design updates.</p> <p>Stormwater and flooding to this drain and area will be reduced as a result of Ashbournes proposed stormwater management devices.</p>

## 16.0 Loss of Productive Land

No.	Summary of Comment	Applicant Response
3.	NPS-HPL/loss of productive land	<p>In summary, the proposed Ashbourne Development includes the following activities:</p> <ul style="list-style-type: none"> <li>• Residential development which is primarily located within the Rural-Residential zone (approximately 75%). In accordance with clause 3.5 of the National Policy Statement (NPS-HPL), the Rural-Residential zone is exempt;</li> <li>• A retirement village located on approximately 20 hectares within the Rural zone; and</li> <li>• Two solar farms located on approximately 43 hectares within the Rural zone. The proposed activity includes provision for the ongoing use of the land for grazing activities.</li> </ul> <p>While the NPS-HPL seeks to protect the long-term availability of highly productive land for primary production, it also recognises that in some circumstances, development on such land is required and can be appropriate.</p> <p>In this case, the Ashbourne Development is strategically located within and immediately adjacent to the existing Eldonwood Structure Plan area. As outlined in the AEE and supporting appendices, it is considered that on balance and with particular regard to section 3 of the Fast-track Approvals Act 2024 (FTAA), the proposal represents an appropriate form of development on high class soils. The following key comments are made in this regard:</p> <ul style="list-style-type: none"> <li>• The Ashbourne development site is located within and immediately adjacent to the Eldonwood Structure Plan. By locating new development as an extension to this area, the Ashbourne projects avoids ad-hoc and urbanisation and fragmentation further outside of the existing urban area. Of relevance, the Eldonwood Structure Plan area is also located over land classified as highly productive, and this has been developed for rural-</li> </ul>
6.		
14.		
18.		
19.		

		<p>residential activities and subdivision, which has contributed existing fragmentation.</p> <ul style="list-style-type: none"> <li>• The Ashbourne development will provide significant social and economic benefits through the delivery of new housing, renewable electricity infrastructure, and employment opportunities. As identified in the AEE and supporting technical reports, the overall development will also maintain, as well as contribute to enhancing environmental, landscape, and amenity outcomes.</li> <li>• The land is subject to permanent and/or long-term constraints such that its productive capacity for land-based primary production is not viable. These constraints are outlined in Appendix 1L Land Use Capability Classification Assessment and Attachment 1 – Legal Memorandum (HPL). Accordingly, while development on good quality soils is generally discouraged, the Ashbourne development represents an appropriate and balanced use of the land consistent with the intent and framework of the NPS-HPL. The proposal also achieves the purpose of the FTAA as it will facilitate the delivery of infrastructure and development that will create significant regional benefits. The scale of regional benefit that will be delivered by the Ashbourne development has been confirmed through the referral process and in accordance with section 22 of the FTAA.</li> </ul>
14, 18, 34	Using productive land for solar farms is not appropriate. Solar infrastructure should be located on brownfield or industrial sites. Once converted, such land cannot be easily returned to productive use. The northern solar farm site is currently in productive use.	The Government amended the NPS-HPL in 2024 to introduce a clearer consenting pathway for specified infrastructure, including renewable energy projects, on highly productive land. Under clause 3.9 of the NPS-HPL, use or development on HPL is inappropriate unless one of the listed gateways applies and effects are managed. A key gateway now is where the proposal is for the development, operation or decommissioning of specified infrastructure and there is a functional or operational need to locate on HPL (cl 3.9(2)(j)(i)). “Specified infrastructure” includes infrastructure recognised as regionally or nationally significant of which solar generation falls within that framework. This policy direction confirms that solar farm activities on highly productive land can be appropriate. Furthermore, solar farms do not permanently limit

		<p>the productive capacity of land, as the underlying soils remain intact and suitable for future farming. In many cases, pastoral activities such as sheep grazing can continue beneath and between the solar arrays, allowing the land to remain in productive use throughout the project's life.</p>
6.	<p>Loss of high value/productive agricultural land will impact SME's which support the local agricultural industries, and is in conflict with the Government's Growth Strategy. Downstream effects could manifest in unemployment and business closures/relocation elsewhere in the supply chain.</p>	<p>The submitter raises concerns about economic losses from the removal of productive farmland. We note that quantifying agricultural productivity and on-farm margins sits outside our expertise and is more appropriately addressed by an agricultural economist or the current land operator. However, to contextualise the scale of land-use change, we analysed all rural titles in Matamata-Piako District classified in Cottality's Property Guru data as dairying, stock finishing, or arable farming. The portion of Highly Productive Land within the Ashbourne site that is not exempt under Clause 3.9 of the NPS-HPL represents approximately 0.02 percent of all land used for these activities across the district. Even if the entire 125-hectare site is assumed to be productive (including the area already zoned residential), it represents around 0.10 percent of the district's farmed land base. In addition, DairyNZ statistics show an average herd size of 448 cows. With 843 herds in Matamata-Piako, this implies approximately 377,600 cows producing around 151 million kgMS per year (at the national average of 400 kgMS per cow). The submitter's claimed loss of 140,000 kgMS therefore represents approximately 0.09 percent of district milk-solids output.</p> <p>At this scale, the proposal is unlikely to materially alter the viability of the district's pastoral economy nor the demand base for agricultural service businesses. Claims that Ashbourne would trigger processor downsizing, business closures, or wider de-growth effects are not credible given the negligible share of land and production involved. In addition, the solar precincts are intended to operate as an agrivoltaic area where pastoral production continues beneath the panels, meaning not all agricultural output</p>

		<p>is necessarily foregone. The project also introduces significant countervailing economic activity. As set out in our substantive assessment, Ashbourne is expected to boost GDP by nearly \$400 million, generate \$230 million in wages and salaries, create ongoing on-site employment, and increase household spending in the district from several hundred new dwellings. These effects are orders of magnitude larger than the foregone agricultural output at this site. Under the Fast-track Approvals Act, decision-makers must weigh adverse effects, including loss of productive land, against regional benefits. In this case, the productive land loss is very small in relative terms and is outweighed by the scale and diversity of economic activity enabled by the proposal.</p> <p>Furthermore, as detailed in the AEE, and in Appendix 1L of the application – Land Use Capability Assessment in the substantive application and Attachment 1 – Legal Memorandum (HPL), the site has several constraints which limit the ability for the land to be used for productive purposes. In addition, I note that a significant extent of the proposed residential activities are occurring on land that is zoned rural lifestyle/residential and within the Eldonwood South Structure Plan area, which is therefore exempt from the NPS-HPL. The solar farm sites will also allow continued primary production activities such as grazing of livestock.</p>
33, 36, 40,	Supports the proposal as owners of the highly productive portion of the site. Summarises the significant difficulties in productively farming the land, and reduced profitability through loss of northern block.	The support is noted.
34.	According to the legal memorandum, the applicant's legal representation indicated approximately 75% of the application site is not zoned as rural/rural production. Please clarify how this calculation was made?	For clarity, the reference to "75%" in the legal memorandum relates specifically to the residential component of the Ashbourne development, rather than the wider project. Of the land proposed for residential use, the majority (approximately 75%) is zoned Rural Lifestyle/Residential and is

	located within the Eldonwood South Structure Plan area. Only a small portion of the land proposed for residential use is zoned Rural.
--	---

## 17.0 Lack of Economic Significance and Housing Demand

No.	Summary of Comment	Applicant Response
6.	Several comments noted that there is sufficient supply in Matamata for both Housing and Retirement Village stock, and that the demand assumptions relied upon for the development are overstated or inaccurate.	The substantive economic assessment (Sections 9 to 12) and peer review response memo evaluate housing demand, existing supply, and the feasibility of plan-enabled capacity. These assessments show that headline capacity in Matamata does not reflect realisable supply. Many lots cited as available are constrained by ownership fragmentation, staging, commercial feasibility, or likely development timing. As set out in the memo's parcel-level review, the HCA substantially overstates feasible capacity, reducing the effective pipeline and bringing forward the medium- to long-term shortfall identified in the HCA.
10.		
14.		
16.		
18.	Comments also noted that MPDC has planned development to the east and north in sufficient quantity to support anticipated growth.	
19.		
24.		
26.		
31.		

		<p>catchment faces a deficit of about 1,200 units over the long term. The proposal helps address this need through its aged-care component, which cannot be met by existing or under-construction facilities alone.</p> <p>A more detailed response is provided in Insight Economics' memo responding to MPDC's Annexure D: Statement of Evidence of Timothy Heath, included as <b>Attachment 7</b>.</p>
6. 26.	Matamata has a lack of employment opportunities to accommodate additional dwellings.	<p>The substantive economic assessment (Sections 6 and 7) sets out the project's employment impacts. The proposal will generate a significant multi-year construction workload and will support ongoing employment across the retirement village, solar farm, and commercial node. Retirement villages are labour-intensive, requiring a stable local employment base, while the commercial node will add local services and small-scale employment.</p> <p>Employment patterns in the Waikato operate at a regional scale. Matamata sits broadly equidistant between Hamilton and Tauranga, both major employment centres. Stats NZ Commuter Waka data confirms that a large share of Matamata residents already travel to work in Hamilton, Tauranga, Morrinsville, and Cambridge. The proposal aligns with these existing commuting flows.</p> <p>Future residents will self-select based on work preferences and travel tolerance. Those relocating to Ashbourne are likely to include people who either commute to Hamilton, Tauranga, or elsewhere in the region, or who work remotely or in hybrid roles. Remote and hybrid working accounts for an increasing share of the workforce nationally, allowing households to choose locations that offer amenity and work-life balance. Ashbourne therefore caters to these preferences without creating new pressure for local employment provision.</p>
6. 15. 18.	Several comments stipulated that the proposed development does not have the regional or national benefit required under the FTAA	Section 22 of the FTAA provides for projects that increase housing supply, support a well-functioning urban environment, deliver economic benefits, or

25.		<p>contribute to climate mitigation through renewable energy. The proposal contributes in each of these areas.</p> <p>The substantive economic assessment (Sections 6 to 12) identifies a multi-year construction programme, ongoing employment from the retirement village, commercial node and solar farms, and the activity generated by several hundred new households. These effects extend beyond Matamata into the wider Waikato labour market and service economy. The assessment also identifies a long-term shortfall of about 1,200 retirement units across the catchment. The proposal makes a material contribution to this need. The solar farms also add renewable generation capacity to the national grid, which is relevant to regional and national energy objectives.</p> <p>In addition, the peer review response memo sets out the economic rationale for using the Fast-track pathway, noting that projects of this scale typically face lengthy and contested RMA processes, with high costs from delay, uncertainty, and under-utilised land. The FTAA provides speed and certainty, enabling investment and delivery of a comprehensively planned community. This aligns with the Act's intent to facilitate projects with significant regional benefits.</p> <p>A more detailed response is provided in Insight Economics' memo responding to MPDC's Annexure D: Statement of Evidence of Timothy Heath, included as <b>Attachment 7</b>.</p>
1. 6.	Requests for a socio-economic justification; claims that no analysis of social, environmental, or financial impacts has been provided; claims the development will remove basic human rights.	<p>From an economic perspective, Section 15 of the substantive economic assessment considers the opportunity cost of foregone rural production and the land's highest and best use.</p> <p>The claim that the proposal would remove basic human rights (health, education, employment, safety, and movement) is not supported.</p>

## 18.0 Construction and Traffic Effects

No.	Summary of Comment	Applicant Response
2. 6. 17. 20. 27. 30.	Several comments raised concerns around the effects of construction on adjoining properties, including noise, vibration and dust generation.	<p><u>Noise</u></p> <p>While noise effects are undesirable, they are necessary for a development of this scale. Comprehensive noise and vibration assessments were undertaken and have been submitted with the application.</p> <p>These assessments found that noise levels would be within permitted levels for the majority of the surrounding properties, except for:</p> <ul style="list-style-type: none"> <li>● [REDACTED] during construction of the solar farm of up to 2dB;</li> <li>● 6 and [REDACTED] during the removal of oak trees near to the boundary of up to 5dB; and</li> <li>● [REDACTED] during earthworks of up to 2dB.</li> </ul> <p>Mitigation measures are proposed where applicable, including temporary acoustic barriers. All adjoining residents will be notified prior to commencement of works. Noise effects will be mitigated to an appropriate level, and managed closely through conditions of consent to ensure minimal disruption to adjoining properties.</p> <p><u>Vibration</u></p> <p>Due to the nature of the soils and works, the vibration assessments undertaken by Styles Group noted exceedances of permitted vibration levels for any adjoining property.</p> <p><u>Dust Generation</u></p>
31.	Comments were also raised relating to the location of earthworks stockpiles, and the preference for these to be located away from existing neighbours.	Stockpiles are located centrally within the site and will be subject to stringent criteria for dust and erosion control.

## 19.0 Traffic Effects

No.	Summary of Comment	Applicant Response
3. 14. 15. 16. 44.	Comments raised around the traffic volumes to be created through the development, and query on the suitability of the roading network to support the additional volume of traffic.	<p>The Integrated Transport Assessment undertaken a series of intersection models to determine the capacity of the intersections in the existing environment and then with the development in place, and with background growth. This included a number of assumptions including no connection to Station Road and Firth Road. With the proposed staging approach developed since the ITA, this modelling can be considered a conservative or worst case scenario.</p> <p>Overall, it is considered that there is sufficient capacity in the network to accommodate the expected traffic increase until such time that the Firth Street connection has been designated and delivered, or the Station Road connection has</p> <p>It is also considered that the requirement to reassess this via an additional Transport Assessment from Stage 3 will provide greater certainty and enable targeted upgrades should they be required.</p> <p>Further consideration of the impacts of this traffic has been provided in an additional memo, included as <b>Attachment 25</b>.</p>
1. 2. 30. 4. 6. 17. 43.	Construction traffic effects, including safety	<p>A number of residents have raised the issue of construction traffic as part of the implementation of the development. In response to this, a staged approach to the development has been adopted. These potential effects have been reviewed, and the following measures have been updated to provide greater certainty regarding the potential effects of construction traffic:</p> <ul style="list-style-type: none"> <li>• All earthworks and civil construction traffic from Stage 3 onwards will be from either a dedicated haulage route from Station Road or a connection to Firth Street. This is consistent with the recommendation of MPDC Transport Expert.</li> </ul>

		<ul style="list-style-type: none"> <li>• A Construction Traffic Management Plan (CTMP) will be prepared to manage construction traffic management effects. A draft CTMP has been prepared for inclusion with this application, and this will be updated following engagement of contractors and based on feedback from MPDC.</li> <li>• Construction traffic movements are proposed to be restricted between 8.30am and 9am, and 3:00pm and 3.30pm to minimise potential conflicts at school peak periods.</li> </ul>
14. 17. 34.	Standards of the Road	<p>Station Road is proposed to be upgraded to an urban standard on the southern side, including kerb and channel to Road 1, and a sealed 3m shared path to the Retirement Village access.</p> <p>It noted that Jellicoe Road is currently 6.0m – 6.5m wide, it is recommended that the operation of Jellicoe Road is reviewed as part of the Stage 3 ITA to confirm if there have been any operational concerns raised during the implementation of Stage 1 and Stage 2.</p>
19. 27. 29. 32. 44.	Concerns around road safety, particularly the Station Road and Smith Street intersection	<p>Following the completion of the Integrated Transport Assessment, updated traffic surveys and intersection modelling was undertaken of the Smith Street intersection. The results of this assessment are provided in the attached memo. On site observations confirm that traffic volumes are greatest during school pick up and drop off, with significantly lower volumes outside of these 20 – 30min periods.</p> <p>The intersection, while busier, continued to operate within capacity, and modelling indicates that this remains the case with the Ashbourne development additional traffic volumes.</p> <p>To improve safety for pedestrians crossing from Station Road, a pedestrian refuge is proposed to be provided on Station Road prior to the Smith Road intersection.</p> <p>In addition to this, a 3m shared path is proposed to be provided from the Road 1 connection on Station Road through to Smith Street to encourage walking and cycling.</p>
18.	Query on the appropriateness of the Spine Road Alignment	The intersection of Station Road and the proposed new spine road (Road 1) has been designed with a curved approach to the intersection primarily due

	<p>to the proximity of the new road to the neighbouring right of way driveway. The location of the intersection and design of the curve has also considered:</p> <ul style="list-style-type: none"> <li>• The location of this road is in general accordance with the Eldonwood Structure Plan.</li> <li>• Section 3.12.3 Table 3C of the MPDCDM gives minimum separation distances between rural vehicle crossings and intersections (such as those already on Station Road in the vicinity of the site).</li> <li>• For Station Road, which has a posted speed of 80 km/hr this is 45m when measured from the centre of the intersection to the centre of the vehicle crossing.</li> </ul> <p>Intersection spacing standards for intersections on opposite sides of the road in Residential and Rural Residential zones require that for an 80 km/hr operating speed on collector / local roads this requires a spacing of 30m. This results in a need to balance the location of the intersection, to maximise the available spacing between the vehicle crossings on the south side of Station Road, and the intersection of Aporo Drive on the northern side of Station Road.</p> <p>Ideally, the vehicle crossings located to the west of the intersection would be relocated to the new spine road (Road 1), however there currently is no mechanism to enable this without the consent of the landowners of the neighbouring properties. Should approval be granted for these vehicles crossings to be relocated prior to the implementation of the later stages of the development – this would enable the road to be redesigned to provide a straighter approach.</p> <p>The Applicant would support the provision of a condition requiring confirmation of the feasibility of relocating the vehicle crossings and reconfirmation of the intersection design prior to implementation. The Applicant is open to options that work should there be positive feedback from those neighbouring properties in question post the conclusion of comments being received.</p> <p>The current intersection location provides good sight distance in both directions, and in the longer term the intersection is not the sole entrance to</p>
--	--

		<p>the development, with the southern portion of the development expected to reach the surrounding network via Peakedale Road. The intersection has also been located as far from the existing vehicle crossing as is practicable to maximise available distance, while still providing a core spine road in general accordance with the Structure Plan.</p> <p>It is noted that there has been support from one party on the neighbouring right of way to facilitate access to the new corridor.</p> <p>There is no mechanism to formally incorporate Chestnut Lane into the proposed development without the permission of the landowners. However, from a transport planning perspective the consolidation of access on to Station Road via a right turn bay at this location would provide a safer location.</p>
1. 2. 30. 4.	Future connection to SH27	<p>It is acknowledged that a connection to Firth Street will provide wider network benefits to the area. The land required to facilitate this connection is not owned by the applicant, and as such a designation is required to facilitate the provision of this connection.</p> <p>The applicant has committed to providing this connection following the designation process undertaken by MPDC.</p>
32.	Limited pedestrian connectivity across Firth Street with only one pedestrian crossing	<p>The provision of a pedestrian crossing on Firth Street/SH27 and across the railway line would require coordination between MPDC/NZTA and Kiwirail.</p> <p>It is considered that MPDC is best placed to identify and deliver such a crossing including confirming where demand is greatest for such a crossing as it will need to serve a wider catchment than the Ashbourne development.</p>

## 20.0 Lack of infrastructure and cost to ratepayers

No.	Summary of Comment	Applicant Response
-----	--------------------	--------------------

6. 10. 15. 16. 19. 20. 24. 25. 26. 31. 38. 49.	<p>Several commenters noted concerns around the lack of infrastructure capacity and the strain that the development will place on the communities existing infrastructure.</p>	<p>The Ashbourne development assists with the long-term infrastructure costs by paying full contributions for the Matamata treatment plant upgrade in a shorter timeframe than otherwise anticipated and also provides new infrastructure (Upgrades to old wastewater, new stormwater management improving Station Rd, ecology, providing nationally critical power generation and aged care hospital).</p> <p>Refer to Supporting documentation, including MPDC Comment Annexures I and K and the draft PDA, providing detailed technical feedback, financial principles, and formal agreements with MPDC</p>
6.	<p>Concerns were also noted around the cost to ratepayers for the upgrades and ongoing maintenance of infrastructure required to service Ashbourne, particularly funding the wastewater upgrades required.</p>	<p>Unity will pay for all internal infrastructure, aligning with MPDC's principle of Growth pays for Growth. Unity is working collaboratively with MPDC to outline required upgrades outside of development and will pay the proportional share that is required to allow the Ashbourne development to be serviced.</p> <p>The Ashbourne development assists with the long-term infrastructure costs by paying full contributions for the Matamata treatment plant upgrade in a shorter timeframe than otherwise anticipated and provides new infrastructure (and Upgrades to old) wastewater, new stormwater management that improves Station Rd flooding issues. Solar is providing nationally critical power generation while also providing local resilience and much needed aged &amp; hospital care.</p> <p>Refer to Supporting documentation, including MPDC Comment Annexures I and K and the draft PDA, providing detailed technical feedback, financial principles, and formal agreements with MPDC</p>

		This approach will ensure Ashbourne funds servicing costs for its growth and not passed onto rate payers.
--	--	---

## 21.0 Effects on character and amenity

No.	Summary of Comment	Applicant Response
6. 16. 20. 25. 26. 27. 31. 38. 44. 49.	Several commenters have noted adverse effects relating to character and amenity of the surrounding environment	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.
20. 27. 44.	Commenters raised concerns over the adverse effects of lighting on the existing environment and adjoining properties.	We acknowledge the comments regarding concerns about lighting within the development, including both public street lighting and private lighting associated with future built form.  A 2.0 metre wide landscaping buffer is now proposed along all existing site boundaries, as shown in the 'Residential Boundary Buffer Plan' included within <b>Attachment 6</b> . This vegetation is anticipated to reach approximately 4.0 metres in height, and will provide substantial visual mitigation and help screen light spill from both public and private sources, while maintaining the functionality and amenity of the development and neighbouring properties.

	<p>The proposed '<i>Ashbourne Residential Design Guidelines</i>' address issues of brightness and orientation relative to neighbouring properties in regards to on-lot private residential lighting.</p> <p>The below snip shows the typical 2.0m wide boundary treatment, with further details provided within <b>Attachment 6</b>.</p>
--	--

	
6. 15. 16. 17. 26.	<p>Lack of existing public/community services, including emergency services</p> <p>We have consulted with MoE and note existing capacity in local schooling with good connectivity provided throughout the Ashbourne development as well as vested roads that can provide for public transport and emergency services. The retirement village development will provide an element of onsite care for its older residents. The Ashbourne development incorporates a supportive</p>

31. 38.		commercial node that can provide for local needs such as healthcare services also.
6.	Mitigation planning – no mention of modern management and business systems/practices to ensure appropriate effects management	Several management plans were prepared and submitted with the substantive application to manage effects. Conditions of consent are also proposed and considered adequate to manage effects.
6.	High density housing issues, particularly relating to carparking and socio-economic impacts	<p>Concern has been raised with regard to the provision off street parking, and in particular smaller lots with limited garage facilities.</p> <p>The development provides for a range of housing typologies to support a range of housing demands.</p> <p>This is to enable future residents to be provided with options that best suit their requirements. On street parking is currently proposed to be provided via indented parking along the roading network.</p> <p>While the proposal represents a higher density than what is permitted under the Rural-Residential zone, it is in keeping with a medium-density built form found elsewhere within Matamata.</p>

## 22.0 Retirement Village

No.	Summary of Comment	Applicant Response
13.	<p>Retirement Village Issues:</p> <ul style="list-style-type: none"> <li>• Connector road unsuitable</li> <li>• Adequate supply in Matamata</li> <li>• Wastewater treatment – consider WWTP not appropriate</li> </ul>	<p><u>Connector Road</u></p> <p>The roading within the village is private and not for use as a public collector road. There are gates at either end of the spine road through the village to deter through traffic. Speed limits within the village are between 10kph and 20kph to additionally discourage public usage should the gates be open. Public access is limited to pedestrian and cycles during daylight hours.</p> <p><u>Adequate Supply</u></p>

		<p>Our economic assessment has confirmed that there is not sufficient supply of Retirement units in Matamata. Please refer to <b>Attachment 7</b> for further details.</p> <p><b><u>Wastewater Treatment</u></b></p> <p>See updated Maven Wastewater engineering plans and updated Innoflow design plans and report for further information regarding the proposed wastewater treatment plant, pump station and disposal field design included in <b>Attachment 10</b></p>
14.	Sewerage Treatment and Disposal Solution	<p>Please refer to updated Maven Wastewater engineering plans and report for further information, included in <b>Attachment 10</b>.</p>
17.	Retirement Village should consider need to get residents to hospitals etc.	<p>It is noted that the Ashbourne Retirement Village includes provision of a 70-bed care level hospital, with on-site nursing staff. While residents will need to access hospitals, it is considered that overall the development will ease pressure on the wider network.</p>

## 23.0 Other Matters

No.	Summary of Comment	Applicant Response
1.	Commenters noted that consultation and engagement from the developer was poor.	The developer was aware there was provision for all stakeholders and neighbours to have opportunity to review and respond to the substantive application through the fast track process. It was on this understanding, that we did not contact each and every adjoining neighbour on an individualised and direct basis.
20.		
49.		<p>There was a letter drop to adjoining neighbours with an outline of the project provided in May 2025, at the bottom of this letter there where DDI details for our Planning team therefore allowed an avenue for concerned parties to get in touch if needed at any point in time.</p>

		<p>Any correspondence that was received by our planners that warranted a response from Unity, was forwarded on and a response was provided.</p> <p>Unity did engage and respond to key individuals and/or groups regarding their concerns as they arose / when it was brought to their attention. Consultation records are available to panel on request.</p>
6. 14. 31. 38.	Claims that the proposal will reduce the value of existing homes or sections in Matamata, including concerns about the solar farms, changes in outlook, noise, and the introduction of higher-density housing.	From an economic perspective, there is no evidence that the proposal would lead to a general reduction in residential values across Matamata. Large master-planned developments with buffers, landscaping, and upgraded infrastructure often increase local amenity and improve market choice, which can in turn support property values over time. Assertions of widespread value decline or impacts on council revenue are not supported by market data.
33. 36. 40.	The current farming area is constrained by the inability to move stock across Station Road, which isolates the northern lot and limits productive use. These access barriers, combined with the farm's marginal economic performance and its proximity to the township, make ongoing farming increasingly impractical and unsustainable.	The Applicant notes the supportive comments regarding current farming constraints, including access across Station Road, the separation of the northern lot, and the farm's marginal performance.
6.	Queried erosion protection when forest plantations are cleared	Noted, however not considered relevant to the proposal.
6.	Ground testing – query whether enough test sites have been drilled in line with NZS 4404:2010, including number of tests and duration of testing.	<p>NZS4404:2010 does not specify a minimum number of test locations when investigating a site, and leaves this up to the judgement of the geo-professional investigating the site. Given our experience with soils in the Hauraki region and industry accepted guidelines, we determined that the a total of 73 targeted test locations would provide the data required to create a ground model for the proposed development area. Geotechnical investigation points were discussed with geo-professionals representing MPDC, and additional testing was completed to yield a total of 95 investigation points.</p> <p>Test results address the variation of soils across the site, with test locations selected to target soils from variable geological units, depositional settings and groundwater conditions.</p>

		<p>Shallow soils have been investigated over the subject site with a total of 43 hand augers, completed down to a maximum depth of 5.0m to visually observe the near surface soil profile and facilitate permeability and strength testing.</p> <p>Analysis related to geotechnical earthquake engineering (geo-seismic effects) has been completed, including an assessment of liquefaction effects. Appendix N of the updated Geotechnical Interpretive Report (GIR) contains a statement of professional opinion as to the geotechnical suitability of land for development.</p> <p>Refer to the updated GIR issued on the 17th November 2025, referenced HAM2023-0124AI Rev 3 for more detail (included as <b>Attachment 5</b>).</p>
6.	Effects on surrounding aquifers	<p>Groundwater levels have been monitored from late 2024 to November 2025 as shown in the attached WGA memo. This provides a full seasonal groundwater level response and our modelling has been updated based on the recorded winter groundwater level (WGA Memo). WGA have modelled that the effects are less than minor on the town water supply which is over 1 km from the proposed take. The effects on the water table are presented in WGA initial AEE, and the WGA memo submitted with the response to comments.</p>
6.	Commercial Precinct, particularly diversion of commercial activities away from the town centre	<p>The proposal's commercial node is a small convenience centre intended to meet the day-to-day needs of Ashbourne's residents. The substantive economic assessment (Section 14; Appendix D) shows it is less than 2 percent of the commercial floorspace in the Matamata town centre and is located internally within the development rather than externally on SH27. It is expected to accommodate a superette, childcare, café and small services suitable for a local catchment.</p> <p>Because of its scale and internal location, it cannot compete with higher-order activities in the town centre. It will not draw trade away from existing businesses to the extent required to create retail distribution effects. The</p>

		<p>town centre will remain the primary destination for retail and services. A significant share of patronage will come from new Ashbourne households, not displaced trade from existing businesses.</p> <p>The node provides local accessibility, reduces vehicle travel for daily needs, and supports a well-functioning urban environment without undermining Matamata's town centre.</p>
6.	Wildlife/Habitat/Ecosystems – significant trees and hedgerows to be removed (including protected trees), and effects on fauna and flora. No mention has been made on management	<p>None of the trees within the proposed development site have a protection status under the Matamata-Piako District Plan. The dominant vegetation cover across the site is exotic and is not considered to have any botanical significance. Specific management measures for fauna (Birds, Bats, Lizards and Fish) are detailed in the Ecological Management Plan prepared by Ecological Solutions.</p>
7.	40m buffer zone between farming operations and development is required, as approved under PC31 – Precinct F in 2009, in order to address reverse sensitivity	<p>While [REDACTED] was not invited by the EPA to comment under Minute 1, we understand that the owner of [REDACTED] leases from [REDACTED] and the two land parcels are farmed together.</p> <p>Notwithstanding, Unity cannot provide a 40m offset. B&amp;A cannot find reference to Precinct F within the Operative District Plan, however would welcome receipt of the relevant documentation.</p> <p>As set out in Section 6.0, Unity will:</p> <ul style="list-style-type: none"> <li>• include 2m landscape buffer on Southern boundary of residential, with consent notice.</li> <li>• 5m BLR</li> <li>• Commit to a no complaints covenant to adjoining lots</li> </ul>
13.	Insufficient parking – household vehicle numbers exceed provision for off- and on-street parking, lack of public transport	<p>Concern has been raised with regard to the provision off street parking, and in particular smaller lots with limited garage facilities.</p> <p>The development provides for a range of housing typologies to support a range of housing demands.</p>

		<p>This is to enable future residents to be provided with options that best suit their requirements. On street parking is currently proposed to be provided via indented parking along the roading network.</p> <p>There are currently limited public transport options within Matamata. The provision of these services would need to be delivered in coordination with MPDC, as they would be most beneficial if coordinated across the wider area.</p>
13.	No community parks or internal greenways	<p>The Landscape Package has been updated to reflect the revised civil design and highlights the two northern wetlands, which provide recreational pathways and passive open space along the perimeter. Together with the centrally located dedicated open space and playground, as well as the southern stormwater pond, which is grassed and can be used for recreational activities during drier months, these elements collectively provide substantial communal open space within the development. This does not include the existing public open spaces surrounding Ashbourne, which remain readily accessible.</p> <p>Refer to updated Landscape Drawings as <b>Attachment 5</b></p>
17.	Queries whether loss of pedestrian connectivity to Eldonwood can be rectified through Ashbourne application	<p>As illustrated by comments received from residents of Eldonwood, a pedestrian connection into this area is not sought. As the road network within Eldonwood is privately-owned, the Developer cannot provide a connection where it is not wanted.</p>
17.	Concerns around 'clumping' of higher density housing together, consider high density lots should be spread throughout development	<p>The smallest lots proposed are 350 m<sup>2</sup>, with the majority around 500 m<sup>2</sup>, which are not generally considered high-density residential sections. Larger lots have also been intentionally allocated along the common boundary adjoining existing rural and rural-residential properties to provide a more reasonable transition and interface</p>
19.	Concerns with the assignment of "Founding Member Rights" of Eldonwood to the developers, and the implied use of common facilities within Eldonwood (roading in particular)	<p>The Applicant does not intend to utilise any common facilities within Eldonwood.</p>
19.	Company structure	<p>Noted, however not considered relevant to the assessment of the proposal.</p>

20.	Open landscape and mature plantings sustain birdlife and flora. Development of Ashbourne would fragment habitats, alter hydrology, and replace the natural soundscape with mechanical noise. Continuous construction, vibration, and light pollution would displace species that currently thrive within Eldonwood estate's canopy corridors.	The ecological value of the existing vegetation cover across the Ashbourne site was considered low due to the historic and current landuse and dominance of exotic vegetation cover. While exotic vegetation can and does provide valuable habitat features for indigenous fauna species in some instances, the current vegetation cover and landuse precludes the use of these features by many fauna species due to the ongoing disturbance regime, including farming, predation by exotic mammals, and fragmentation of habitat. The proposed disturbance regime is expected to result in a "loss or alteration to one or more key elements/features of the existing baseline conditions, such that the post-development character, composition and/or attributes will be partially changed at the ecological district scale" pre-effects management. Post effects management it is expected there will only be a "minor shift away from existing baseline conditions. Change arising from the loss/alteration will be discernible, but the underlying character, composition and/or attributes of the existing baseline condition will be similar to pre-development circumstances or patterns" at the ecological district scale.
24. 31.	Request 8m buffer zone maintained at developer cost, no construction materials along shared boundaries with Eldonwood	A 2.0 metre wide landscaping buffer is proposed along the common boundary with Eldonwood. This is anticipated to adequately mitigate adverse effects, and will be established by the Developer in the first planting season following the relevant earthworks period. This will enable establishment prior to the construction of dwellings.
24. 27. 31. 32.	Connectivity to Eldonwood is not supported	The pedestrian connection to Eldonwood has been removed.
31.	Inconsistencies in application	Noted
31.	Oppose laying of services within the Eldonwood walkway	Unity have a signed letter from Eldonwood Precinct Limited for the laying of services within the Eldonwood walkway.
44.	Run a B&B which would be impacted by the development	Noted. Mitigation measures are proposed as set out in this response to provide visual landscape buffers between existing residential properties and the proposed development.

## 24.0 Submission Numbers

---

No.	Name
1	Peakedale Drive Residents Group
2	Ken Johnson
3	Michael Freegard
4	Pippins Development Limited
6	Ian Hayes
7	Ronald Vosper
10	David Webb
12	Station 143 Ltd and Begovich Investments Ltd
13	Roger and Elizabeth Coutts
14	Hayden and Alesha Begovich
15	Penny Vulgar and Brad Peterson
16	Dionne and Hayley Caulfield
17	Jenny and Graeme Purches
18	Angela Jones
19	Martin Althuizen
20	Corinne Imbert and Ian Hammond
21	Robyn Ma and Steven Li
22	Maurice and Beth Vosper, Jason Kranenburg, and Clare Vosper
23	Peter and Julie Hyde

Barker & Associates

+64 375 0900 | [admin@barker.co.nz](mailto:admin@barker.co.nz) | [barker.co.nz](http://barker.co.nz)

Kerikeri | Whangārei | Warkworth | Auckland | Hamilton | Cambridge | Tauranga | Havelock North | Wellington | Christchurch | Wānaka & Queenstown

24	Kelly and Jacob Henderson
25	Mark and Tracy Cresswell
26	Nigel and Kat Ross
27	Wayne and Adrienne Tobeck
28	Gareth Hemmings
29	John Lee
30	Chris Johnson
31	Joanne Morgan
32	Robin and Lynley Jobe
33	RA Hemmings Limited
34	Roger Slattery
35	Jessica Wilson
36	Meghann Brown
37	John and Maria van Heuven
38	Fiona Stoffer
40	Jessica Crowe
41	Perpetual Guardian
42	Eldonwood Limited
43	P&M Equipment Hire Limited
44	Kathleen and John Day
48	Eldonwood Residents Association
49	Gemma and Brogan Connor

**Barker & Associates**

 +64 375 0900 | [admin@barker.co.nz](mailto:admin@barker.co.nz) | [barker.co.nz](http://barker.co.nz)

Kerikeri | Whangārei | Warkworth | Auckland | Hamilton | Cambridge | Tauranga | Havelock North | Wellington | Christchurch | Wānaka &amp; Queenstown