

█ comments re Ashbourne development (Property adjacent to the Proposed Northern Solar farm)

I do not believe that this project conforms to the criteria for the Fast-track process. This Fast-track proposal could have large negative impacts which would outweigh the positive impacts for Matamata or New Zealand (regional or national benefits).

*NB all yellow Highlights in this document have been added. Quotes from documents are in bold and italics. All other writing is mine.

In the original application [01-Referral-Application-Form.pdf](#) it states the following criteria needed for this fast-track proposal is:

2.6 Appropriateness for fast-track approvals process

2.6.1 The criteria for accepting a referral application is that the project is an infrastructure or development project that would have significant regional or national benefits.

In the document [*Attachment 1 - Legal Memorandum](#) it states that:

11. the Panel may decline the approval only if it forms the view that adverse impacts of the proposal are sufficiently significant to be out of proportion to the regional or national benefits of the proposal

The Proposed benefits are urgent housing, 2 solar farms and a retirement village.

However, I have seen that;

In the original application, the [21-Combined-Comments.pdf](#) (pg 6,7 of the pdf) Waikato regional council has stated that Matamata is not in need of urgent housing

WRC staff consider that the solar farm component of this application could be considered as regionally significant, as renewable energy has been identified as a priority by central government. However, we do not consider the remainder of the application to be regionally significant based on the criteria listed in s22(2)(a) of the Fast Track Approvals Act 2024 (the Act). In particular, we consider the retirement village component of the application and lifestyle block adjoining the solar farm to be inconsistent with the Waikato Regional Policy Statement and national direction. While the proposal will increase the supply of housing in the Future Proof sub-region (consisting of Waikato District, Hamilton City, Waipā District and Matamata-Piako District), the most recent Housing Capacity Assessment² shows that Matamata will be able to meet the demand for housing in the short and medium terms (1-10 years), The capacity assessment does show an insufficiency of housing over the long-term (11-30 year) period, but this allows Matamata-Piako District Council sufficient time to identify and rezone suitable land, aligned with infrastructure provision, to meet this insufficiency. Therefore, we consider that only the solar farm component of this application is of regional significance.

The 500 extra houses that this development proposes will be well above the amount needed ***to meet the demand for housing in the short and medium terms***. We do not have the employment opportunities in Matamata to support this extra amount of housing. This development could have a huge negative impact on Matamata.

*The Minister for seniors, Casey Costello, states that ***the retirement development's location needs consideration for transport due to its distance from town.***

I understand that you will be receiving comments from other invited parties addressing concerns that I have as well (including an engineering report from Barr and Harris Surveyors Ltd around flooding and liquefaction). I am very concerned at the professionalism/inconsistencies /competence/errors in Ashbourne's submissions of this project. In the substantive review there are many discrepancies. I have grave concerns that these discrepancies could have serious adverse impacts on this area. I will be focusing on issues concerning my property at █

█ later in this submission.

Question of reduction of pasture production etc of the Northern Solar farm on the Highly productive land

There is a New Zealand study published by the Ministry for Primary Industries called "Putting the Farm into Solar Farms, SLMACC project agreement number 406908 MPI Technical Paper No: 2025/15, Prepared for Ministry for Primary Industries By Zac Beechey-Gradwell, Ashehad Ali, Paul Shorten (AgResearch Limited) in December 2024. (This publication is also available on the Ministry for Primary Industries website at <http://www.mpi.govt.nz/news-and-resources/publications/>)

The whole document is very informative and applicable to my argument. I have included a few of the comments below.

Page 5 of the pdf (their page 1) states:

APSIM modelling across six diverse sites showed that reductions in pasture production under panels ranged from 3% to 34%, with greater reductions occurring at sites with high baseline pasture productivity. High-production sites, with fewer water and thermal constraints to plant growth, exhibited stronger light responsiveness and therefore larger production losses under panels. Conversely, low-production sites experienced smaller losses, suggesting that agrivoltaics could deliver financial benefits with minimal agricultural productivity trade-offs in dry stock systems situated on marginal land. Future empirical pasture agrivoltaics research should incorporate feedbacks from the grazing animal, while modelling would be improved by a better understanding and incorporation of the dynamic microclimate changes introduced by panels, and potential changes in pasture species composition. In drier regions of New Zealand, agrivoltaics shows promise as a climate-resilient dual land-use solution with limited trade-offs. This somewhat reinforces the conclusion from the field trial that in New Zealand's drier climates, the required reductions in stocking rates in agrivoltaic paddocks may be minimal. It also suggests that installing solar within dry stock production systems on marginal land could generate substantial financial benefits with minimal trade-offs.

On their p2 they state

However, there are also legitimate concerns that shading introduced by the panels will penalize the productivity of high-value pastoral land.

Their Page 38 states:

- **Currently, two thirds of all solar is in the north island.**
- **Estimate of current spatial coverage is currently only 360 hectares of solar in total (includes rooftop).**
- **A 2023 investment survey indicates: 1200 MW has been committed to be built - that would be about 2000 hectares of land.**
 - **There is 5000 MW that is being 'explored' to be built as of 2025 and 2026. This represents up to 20000 hectares of land.**
 - **Note that if 5000 MW of solar is built, this would actually meet the entire demand of the NZ electricity market at noon most days. So we don't need that much capacity. We need batteries to move this generation to peak times. Or we need to build solar near new load, which can directly use the new generation.**

Their page 39 discusses a highly productive farm

- **When averaged across the entire agrivoltaic paddock there was a ~50% reduction in annual pasture growth at this site due to solar panels**
- **Under the panels there was 41% weed content in the pasture (c.f. 19% in the open paddock). Significant difference. Could be a sheep camping effect?**

Their page 40:

- **A workshop with farmers indicates that planning and consenting for agrivoltaics systems needs to be designed with farmers and grazing systems in mind – in order to avoid the mistakes made by the hasty deployment of a solar grazing industry overseas.**

Their Page 41

•**Anecdotally there are already regions of NZ where farmers want to develop modest sized solar farms but are locked out of the market because the **grid already has adequate supply.****

The Northern solar farm does not fit this description of marginal land. This is the wrong place to put a solar farm (highly productive soil = up to 50% reduction of productivity).

The developers, on page 10 of [15-Attachment-14-Planning-Memorandum-for-Referral-Application.pdf](#) in regard to the proposed solar farms, the assessment pathway under the NPS-HPL, quote:

Clause 3.9(3) requires territorial authorities to ensure that any use or development on highly productive land: (a) minimises or mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land in their district

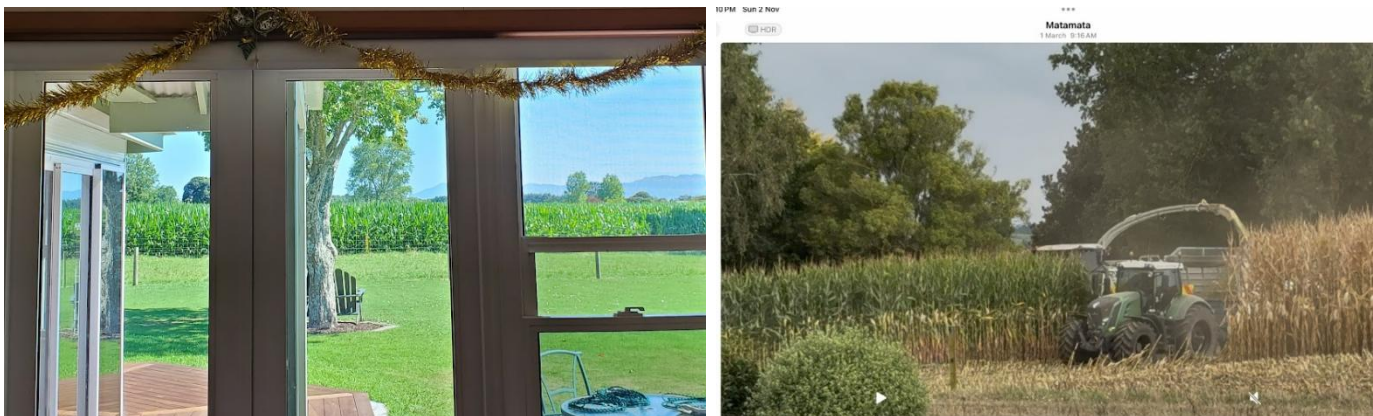
(b) and avoids if possible, or otherwise mitigates, any actual or potential reverse sensitivity effects on land-based primary production activities from the use or development.

(The developers then say)

It is considered that the proposal can demonstrate that it minimises and mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land and avoids reverse sensitivity effects.

The MPI document disputes this statement.

I have seen how highly productive this land is on the 3 years that I have been on this property. The whole of this northern farm area has been shown to highly productive. Winter grass grows very well, and summer crops are some of the highest yielding in the area.



Photos showing maize growth on 28/12/2024 and harvesting on 1/3/2025



Above picture showing grass growth from grass silage cut on 9th Oct to growth 3rd November 2025. Lawns on the property have been growing very well as well.

Land available for maintenance of stock (stock yards/loading races etc) within the northern solar farm

I am concerned with the lack of information around land that should be available for stock management within the solar farm.

[Attachment 1 - Legal Memorandum](#) page 28 the developers state

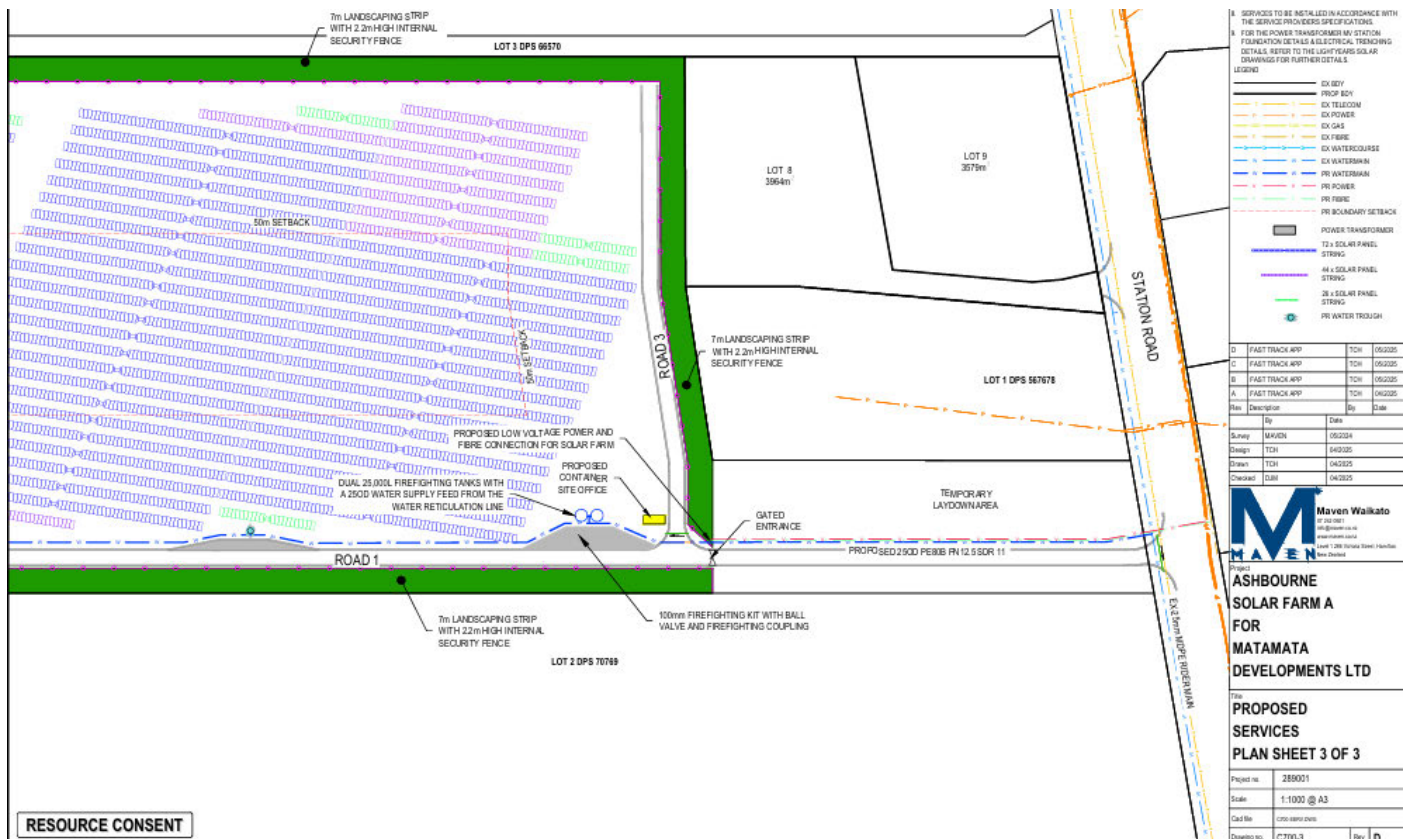
The drainage and slope characteristics of the land to be utilised for the proposed Stage 1, 2 and 3 solar farm is likely suitable for dual use solar farming (agrivoltaics), allowing the productive potential of the land to continue to be utilised for pasture production and sheep grazing, whilst supporting primary electricity generation.

I cannot see any space within the solar farm for stock management as part of this Northern Solar farm. There has been no consideration for stock yards for drenching, shearing (if sheep are actually planned although no actual numbers of stock have been identified) and other animal husbandry (facial eczema, worms, fly strike, hoof management etc) or loading races for loading and unloading the stock on/off trucks in this plan. They have constantly said how stock under the panels is one of the reasons solar is beneficial, but they have not made any placement for land to actually manage the stock. If this fast-track goes through, the area set aside for the lots 8 and 9 could be a good place for this. This is another reason why there is no need (or even legal possibility/reason) why these sections need to be there.

If one of their reasons for being able to use the highly productive land for this solar farm is the benefits of having stock under the solar farm (**agrivoltaics**), they have not shown how this will happen (**how the agrivoltaics actually works**).

Water for the solar farm

The below diagrams show that the developers are proposing to join up with the existing Matamata water supply. I do not see how this is possible. Properties closer to town that have recently built have been declined access to this water supply pipe and have had to provide their own water (either bore or roof supply). The property at [REDACTED] is an example of this. How are they going to provide water to this farm when other houses closer to town are unable to?



Is the council aware that this is for stock management as well as the needed firefighting water tanks?

I am not a farmer, but my study has shown that they will be needing 400-1400 litres of water per day for stock (the developers are saying sheep) management. Studies I have done (there is quite a bit of variation in the websites I looked at) has shown that sheep are usually at 5-12 sheep per hectare depending on soil. They drink 4-14 litres per sheep per day. As this is very high-quality/high yielding soil (taking into account the possible 35% lost grass production from the solar shading), I am seeing that they will be running very conservatory at around 100 sheep at possibly 10 litres per sheep which equals 1000 litres per day

www.waternz.org.nz/Attachment?Action ([Attachment](#)) states that The average daily house use is (litres) 543 litrs per day

They will also be needing more water at a time when water supply is low in Matamata to supply hot thirsty sheep. This will put even more pressure on a very strained system. We have water restrictions from early January already. If they do not get consent from council to connect to the Matamata supply, they will be needing a bore. Is this possible? Or will they be using water from across the road (the existing water supply on this farm is from the farm across the road.)

Zoning of the 2 properties adjacent to our property (Lot 8 and 9) Included in the Northern Solar Farm Plans

I do not agree with the developers reasoning that they can change the zoning and subdivide the 2 proposed lots 8 and 9 adjacent to my property, which are part of the highly productive rural zoned northern solar farm.

[Attachment-1-Legal-Memorandum.pdf](#) states

14. Highly productive land means land that has been mapped in accordance with clause 3.4 of the NPS:HPL and is included in an Operative Regional Policy Statement. That has not occurred at this stage, but clause 3.5(7) contains the prescription of what is to be treated as highly productive land before mapping occurs. Prior to mapping occurring in the Regional Policy Statement, highly productive land is land that is zoned general rural or rural production and is LUC1, 2, or 3 land; but is not: i. ii. Identified for future urban development; or Subject to a Council initiated, or an adopted, notified plan change to rezone it from general rural or rural production to urban or rural lifestyle.

15. A small portion of the application site is zoned rural, however the majority is not zoned either rural or rural production. Approximately 75% of the application site is not under a rural or rural production zoning and therefore cannot be treated as highly productive land.

16. Policy 3.9(1) provides that territorial authorities must avoid the inappropriate use or development of highly productive land that is not land based primary production.

17. Parts of the application site are proposed for use for solar energy generation, which is specified infrastructure as defined in the NPS, for which exemptions exist under Policies 3.8 and 3.9. The planning commentary in Appendix 1 addresses the application of Policies 3.8 and 3.9 to this proposal, concluding that the solar farm proposal is specified infrastructure.

According to page 2 of Attachment 1 appendix 2 of the legal memorandum pdf

It is also noted that under Rule 8.3.1 of the Matamata-Piako District Plan, solar farms are a permitted activity in the rural zone.

If the developer's argument is that "it is permissible to have a solar farm on rural land", why or how can they subdivide on a rural property that has already been subdivided? (my property was subdivided in 2022 as part of the northern rural farm lot.) How can they change the zoning for part of this rural farm? I do not understand how they can still subdivide /add these 2 lots (lot 8 & 9) on this highly productive land of this Northern solar farm.

Inconsistencies/errors directly affecting my property at 172 Station Rd

The following are small inconsistencies/errors that have a huge impact on my property:

2412_ASHBOURNE_MEMO_LSCAPE_FINAL_R01 it states

Northern Solar Farm

Screen planting of a 7m buffer strip consisting of a minimum of 3 rows of planting and 1-2 rows of medium sized trees (4-5m maximum height) behind the common boundary with adjoining properties that have their primary dwelling within 50m of the solar farm boundary,

There is no mention of large trees in this document.

In the later plan https://www.fasttrack.govt.nz/_data/assets/pdf_file/0015/10149/Appendix-3B_Landscape-Drawings_02_of_03.pdf they state 5m **minimum** height in one diagram and 5 mtrs **maximum** height in other places of the same document . This will have a huge impact on me if the correct answer is minimum.

SPECIMEN TREES



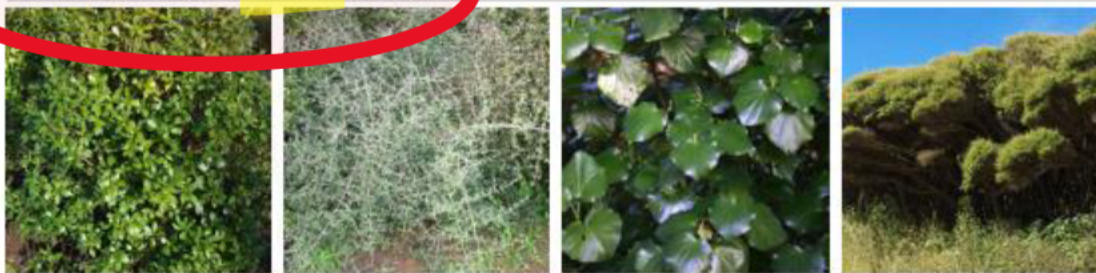
Dacrycarpus dacrydioides

Knightia teretifolia

Laurelia nouae-zelandiae

Sophora microphylla

SCREENING MIX ZONE - MAX 5M HIGH (SZ)



Coprosma robusta

Coprosma propinqua

Marcopiper excelsum

Leptospermum scoparium

Photo below is from a diagram in an email from Maven with a link that didn't work to a website. When I saw 5 metres minimum (partially hidden) I went into the website myself.



I was sent an email from the developers after questioning them about the buffer, with a picture of the above vegetation buffer. This email was incorrect/ deficient. It did not show the huge trees that they have included in another document that are planned to be planted directly north of my property (kahikatea trees that grow to 65 metres along with 3 other species). I had to find this information myself on the fast-track website. These very large trees will shade my property, possibly causing mould and mildew to grow. I have solar panels on my roof. These trees could shade these panels and negate my own solar energy, which is being exported into the national grid.



Figure 1 from what I found on other pages in the substantive application website myself after receiving the email.
https://www.fasttrack.govt.nz/data/assets/pdf_file/0015/10149/Appendix-3B_Landscape-Drawings_02_of_03.pdf

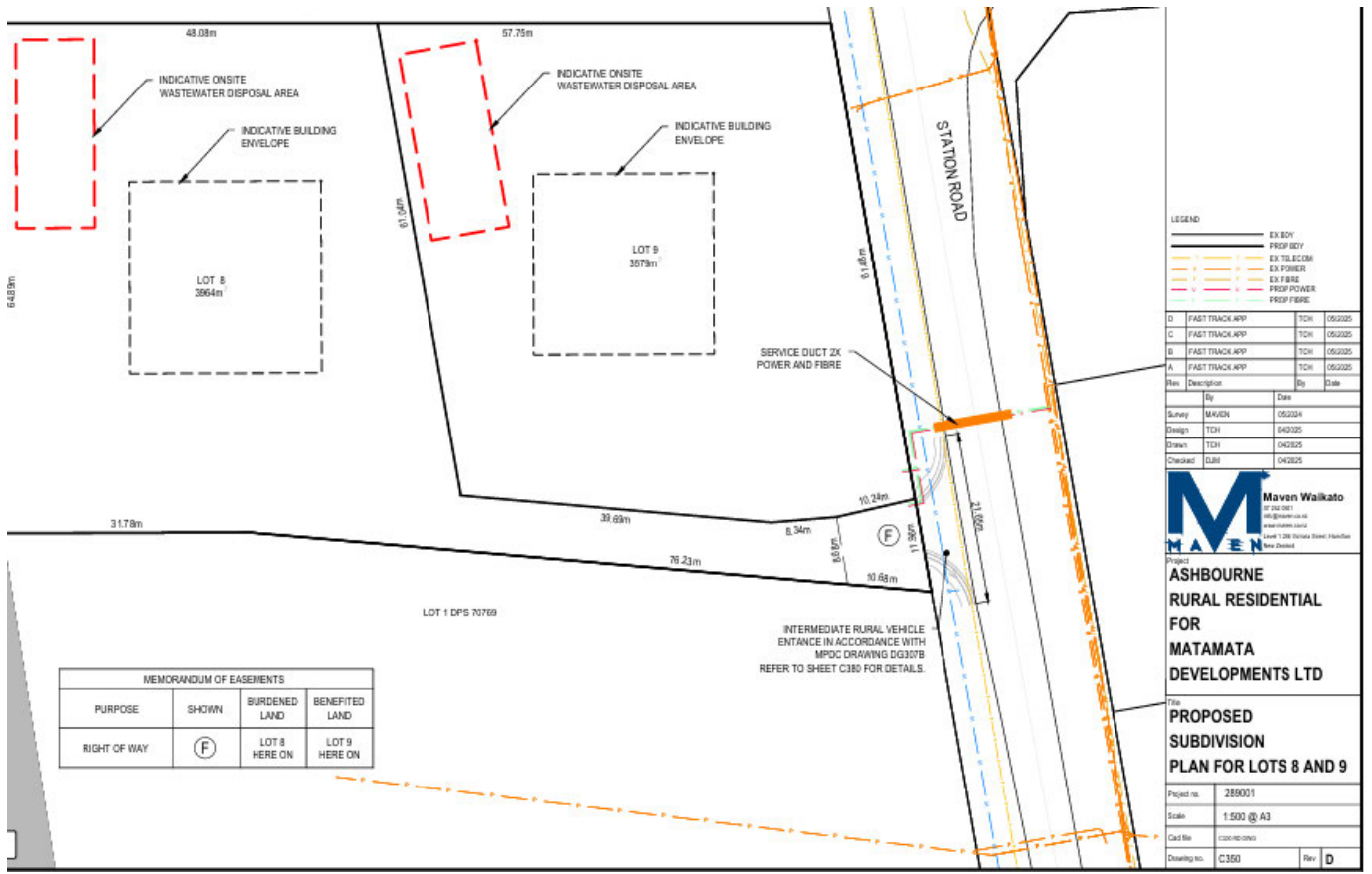
Also note that the sizes of trees and plants on the box do not agree with my research on websites that I have looked at, especially [NZ Native Plants | Complete Guide to New Zealand Flora](#).

Code	Botanical Name	Common Name	Grade	Spacing	HxW Mature	Researched heights
Tall Specimen Trees						
DD	<i>Dacrydium dacrydioides</i>	kahikatea	45L	as shown	50 x 5m	Up to 65 m
KE	<i>Knightia excelsa</i>	rewarewa	45L	as shown	15 x 3m	Up to 30 m
LN	<i>Laurelia novae-zelandiae</i>	pukatea	45L	as shown	10 x 4m	Up to 35 m
SM	<i>Sophora microphylla</i>	kōwhai	45L	as shown	8 x 3m	Up to 10 m
SZ Screening Mix Zone - Max 5m High						
5%	<i>Austroderia fulvida</i>	toetoe	3L	1m	1.5 x 1.5m	2m x 2m
25%	<i>Coprosma robusta</i>	karamu	3L	1m	5 x 4m	Up to 6 m
10%	<i>Coprosma propinqua</i>	mingimiri	3L	1m	5 x 2.5m	Up to 7 m
5%	<i>Leptospermum scoparium</i>	manuka	3L	1m	4 x 3m	Up to 4 m
25%	<i>Macropiper excelsum</i>	kawakawa	3L	1m	4 x 4m	5-10m
15%	<i>Pittosporum tenuifolium</i>	kohuhu	3L	1m	5 x 3m	Up to 10m
5%	<i>Phormium cookianum</i>	wharariki	3L	1m	1.5 x 1.5m	1.6 (2 mtrs with stalk)
10%	<i>Myrsine australis</i>	red matipo	3L	1m	5 x 3m	Up to 6 m
AS Amenity Shrub Mix Screening Zone - Under 2.5m High						
15%	<i>Astelia grandis</i>	swamp astelia	2L	1m	1.5 x 1.5m	Up to 2 m
5%	<i>Austroderia fulvida</i>	toetoe	2L	1m	1.5 x 1.5m	Up to 3.5 m
15%	<i>Carex virgata</i>	puka	2L	1m	1 x 1m	1 m
5%	<i>Corakia buddleioloides</i>	corakia	2L	1m	2 x 2m	2m
15%	<i>Coprosma rhamnoides</i>	twiggy Coprosma	2L	1m	1.5 x 1m	1-3 m
25%	<i>Phormium cookianum</i>	wharariki	2L	1m	1.5 x 1.5m	1-2m
20%	<i>Veronica stricta</i>	koramiko	2L	1m	2 x 1.5m	1-4m

Most of the Information of sizing was found at [NZ Native Plants | Complete Guide to New Zealand Flora](#). And other NZ sites.

Inconsistencies in placement of transformers

There are also 2 different plans for the Northern solar farm in different documents in the substantive application. One says the transformers are placed at 1/3 and 2/3rds within the solar farm. (App.3F Engineering Drawings Northern p.1 and p.10). Another shows one transformer very close do my section boundary (with the other halfway down) (1M Geotechnical report part 1 p.30). I have since been told that the correct is 1/3 -2/3 placement, but I am very concerned that both were in the substantive plans when one could have been shown as no longer applicable. I also have concerns as to whether this is actually correct.



LEGEND

- EX. BDDY
- PROSP. BDDY
- EX. TBLECOM
- EX. FIBRE
- PROSP. FIBRE

D	FAST TRACK APP	TCH	05/2025
C	FAST TRACK APP	TCH	05/2025
B	FAST TRACK APP	TCH	05/2025
A	FAST TRACK APP	TCH	05/2025

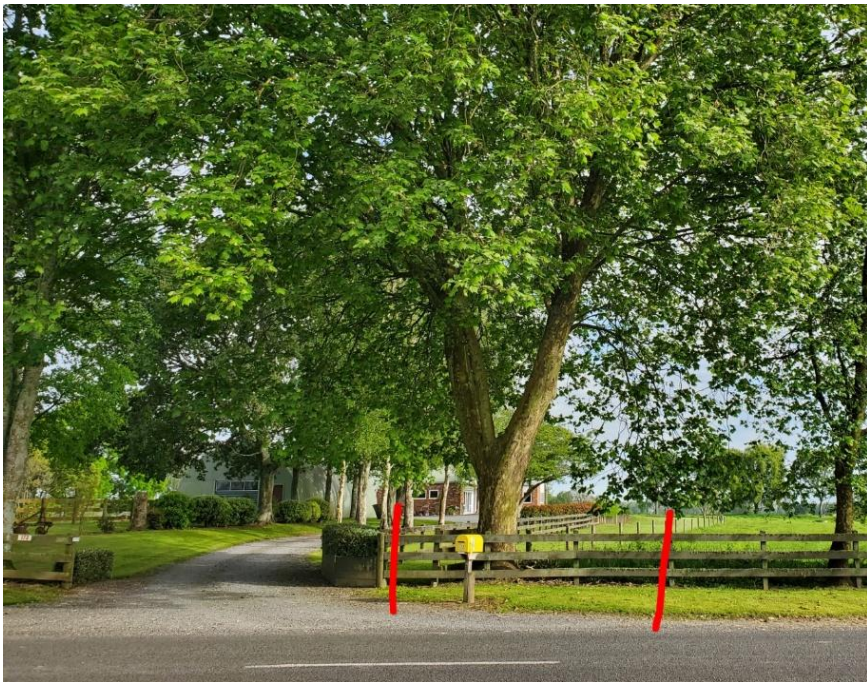
Rev	Description	By	Date
Survey	MAVEN	05/2024	
Design	TCH	04/2025	
Drawn	TCH	04/2025	
Checked	CLM	04/2025	



Project
ASHBOURNE RURAL RESIDENTIAL FOR MATAMATA DEVELOPMENTS LTD

Title
PROPOSED SUBDIVISION PLAN FOR LOTS 8 AND 9

Project no. 289001
Scale 1:500 @ A3
Cad file c380.rvt
Drawing no. C380 Rev D



The above photos are of the tree which is on the border of 172 Station and the entrance way to proposed Lot 8 which has very large roots extending in all directions. Also note another tree to the right.

Flooding

My niece has recently had her house in White Swan Rd, Mt Roskill Auckland bought out by the Auckland city council as it was seriously flooded in January 2023 due to poor planning. She had over 1 metre of water running through her house and had to escape quickly from the building. Who would be held accountable if/when this happens in Matamata if this development eventuates?

I have heard that other submitters will be addressing this issue. I am showing my experience of flooding at [REDACTED]. The photo below shows flooding of the paddock in the property at [REDACTED] from my property taken on 01.07.23



The following are photos from a recent heavy shower

Matamata
4 October 3:15 PM



Photo at [REDACTED] 3.15 pm 4/10/25

Matamata
4 October 3:16 PM



Looking back at [REDACTED] 3.16pm 4/10/2025

The above photos show normal water on roads after a large shower of rain. This is very common

4 October

3:15 PM



Photo taken looking at the drain opposite 182 where the subdivision/retirement home is proposed. The times of these photos are 3.15 pm and 5.45pm on 4/10/2024.



Photos showing the size of the drain under the road outside [REDACTED]. This has recently undergone repair/maintenance by the Waikato Regional Council (as this is rural land) after flooding caused the fence at [REDACTED] to fall over.

A few General concerns

Under 2.10 Item 2(l) – Spine Road Alignment

Re Ashbourne [FTAA-2507-1087 – Response to Item [2] as part of Minute 2

It states 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.

This should have been established/ confirmed before the starting of this proposal. There could be up to 1000 cars in this 500-house development plus the proposed retirement home traffic. Safe entrances/exits should have been established. This could have a very negative impact on safety of road traffic. This has the potential to cause 2 very dangerous intersections, especially the entrance near the corner at the proposed new spine road (Road 1).

I also question that if the solar farms are one of the reasons that this fits the fast-tracking criteria, why is the second larger farm proposed to start no earlier than 2031/2032?

https://www.fasttrack.govt.nz/__data/assets/pdf_file/0007/10141/Appendix-1U_Overview-Construction-Staging-and-Timeframes_Redacted.pdf

Solar Farm South,

The Southern Solar Farm is envisaged to commence site preparation and civil works from no earlier than over the 2031/2032 summer earthworks season. Following this the Solar Farm panel and electrical works are forecast to take place within 12 months.

The total amount of houses that the developers say will be provided by the solar farms is up to 8,000 homes.

The northern farm is only going to provide around 2370 homes (12.74 hectares). The southern farm is providing nearly 2/3s more at 5630 homes (30.21 hectares) than the northern farm so should be very high priority if this is a reason for Fast-track.

In conclusion.

What I am seeing and from what I have learnt over the last few months is that a group of developers (mainly from Auckland) have decided that Matamata needs (even though the MPDC and Waikato District Council show documents that disagree with this) a high density, low cost/affordable housing development on land that is highly productive, with a very high-water table and liquefaction issues (from other submissions) and with the solar farms that are proposed in the wrong place/ wrong type of land (highly productive farms). This has been submitted without any discussion around employment for all these people and other resources needed (e.g. doctors etc) to support all these people.

Again, in looking at the following:

2.6.1 The criteria for accepting a referral application is that the project is an infrastructure or development project that would have **significant** regional or national benefits.

I believe that this statement is untrue/ unsuitable for Matamata. It has the potential to have a significant negative impact on Matamata with the way that it has been put forward. It feels too rushed, with too many small (and larger) mistakes/errors/inconsistencies to be approved.