

To: Environmental Protection Authority (EPA)

From: Rebecca Shaw & Fraser McNutt – Barker & Associates Limited

Date: 7 February 2025

Re: Planning Memorandum for **Gordonton Country Estate** (*Gordonton*)

1.0 Introduction

1.1 Gordonton Country Estate

Gordonton Country Estate Limited engaged Barker & Associates ('B&A') to provide planning services for the master planning, consenting and design of Gordonton Country Estate Development. Gordonton Country Estate Development directly adjoins Gordonton village in the Waikato and comprises a total area of 66.55 hectares.

The purpose of this project is to establish a retirement village/estate which has a point of difference to reflect the rural values and attributes of the site and surrounding locality and to provide much needed aged care living for the Waikato District & Region. The project shall include grazing land in and around the site to break up what would be the typical perception of a retirement village. An additional point of difference is also ensuring the site provides connectivity with the village of Gordonton through pedestrian walk ways and/or cycle ways.

The project shall create a unique village/estate style layout with 7 or so 'clusters' of housing. Each cluster is intended to be of approximately 6Ha and having a density of approximately 15-20 units per hectare (approximately 120 housings/ units per cluster) with circa total of 659 units overall. The Country Estate will be run by a single corporation and is not intended to be subdivided into multiple land ownership.

It is intended to provide on-site amenities/ facilities including a communal facility with the main centre offering typical village amenities, cafe, apartment style accommodation and further health care provision. Provision of infrastructure will all be managed on site.

The Site

The proposed site is of irregular shape and is approximately 66.55Ha comprised in one record of title 676234 legally described as Lot 3-4 Deposited Plan 328606 and Lot 2 Deposited Plan 481700. The site has a relatively flat topography. Remnant forest vegetation occupies fragments of the site comprised within a small grove dominated by kahikatea (*Dacrycarpus dacrydioides*) with other native species present such as lemonwood (*Pittosporum eugenoides*), tī kōuka (*Cordyline australis*) and pōhuehue (*Muehlenbeckia australis*). The grove of remnant forest vegetation within the site is not marked as a Significant Natural Area (SNA) on current operative plan maps.

The site has approximately 3.8 km of stream habitat. There are seven artificial watercourses with a combined length of approximately 2.6 km and five modified watercourses with a total length of approximately 1.2 km. The site is identified to have a stream/ water body running along the west boundary adjoining with the Gordonton village identified as the Komakorau Stream.

The site is zoned as 'Rural' under the Waikato Operative District Plan (ODP) and General Rural Zone under the Waikato Proposed District Plan – Appeals Version (PDP-AV). The site adjoins Gordonton Primary School to the north also identified as Designation C31 under the ODP and Designation MEDU-29 under the PDP-AV. The site is also applicable to a Site of Significance to Maaori (item 284) which is detailed to be the Otaahua Paa and is described as a Paa site with shallow ditch, depressions, and a small terrace.

Table 1: Site's Land Parcels.

Appellation	Landowner Name(s)	Area (hectares)
Lot 3-4 Deposited Plan 328606 Lot 2 Deposited Plan 481700	Fermanagh Trust Limited	66.55

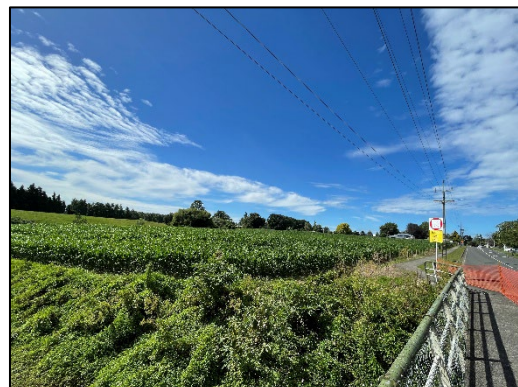


Figure 1 Photos of site.

2.0 Experience

B&A have provided planning expertise on a wide range of developments, under the Resource Management Act 1991, COVID-19 Recovery (Fast-track Consenting) Act 2020, and the recent Fast Track Approvals Bill. This includes, but is not limited to: providing planning advice; referral applications; obtaining resource consents under District Plans, Regional Plans, and National Environmental Standards; consultation; and expert witness conferencing.

2.1 Rotokauri Greenway & Minor Arterial Fast-track Consent

B&A were responsible for the planning inputs for the 'Rotokauri Greenway & Minor Arterial Transport Corridor' resource consent application. On behalf of Hamilton City Council and Hounsell Holdings Limited, B&A obtained a comprehensive suite of resource consents for the construction of the Rotokauri Greenway and Minor Arterial transport corridor, under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Located in Rotokauri, Hamilton, this development involves the construction of a 4.7 kilometre length greenway corridor between two lakes to effectively manage and attenuate stormwater within the catchment, construction of artificial wetlands for stormwater treatment, construction of a 1.3 kilometre Minor Arterial transport corridor, and supporting infrastructure.

This primarily infrastructure project was complex, particularly as it involved works within designation and notice of requirement areas, with several ecological matters (such as black mudfish and natural wetlands) that required offsetting and compensation.

B&A led and supported with the following:

- Coordination of specialist documentation;
- Consultation with stakeholder, including territorial authorities, Mana Whenua, and adjoining landowners;
- Preparation and filing of the referral application;
- Preparation and lodgement of the resource consent application;
- Participation in expert witness conferencing;
- Obtaining Section 176 Approval; and
- Review of draft conditions.

Resource consent was granted by the panel, subject to conditions of consent, on 17 July 2024.

2.2 Current Projects under Fast-track Approvals Bill

B&A are continuing their involvement with fast-track projects, with the referral applications prepared for a number of those listed on Schedule 2 of the Fast-track Approvals Bill. Of particular relevance to Gordonton is 'Southern Links 1' and 'Wallace Road Stage 1A and 1B subdivision and land use consent with associated roading and infrastructure', which are both housing and land development projects.

Southern Links 1

B&A led the preparation of the referral application for ‘Southern Links 1’, which was successfully listed. This project enables extensive greenfield development that comprises 48 hectares of residential development to deliver 1,035 residential units and 66 hectares of industrial development. The project extends across multiple territorial boundaries and triggers a number of both regional and territorial resource consents.

B&A will be responsible for coordinating the fast-track application, providing input into the design, oversight of consultation, and preparation of the application.

Wallace Road Stage 1A and 1B

B&A led the preparation of the referral application for ‘Wallace Road Stage 1A and 1B subdivision and land use consent with associated roading and infrastructure’, which was successfully listed. This project enables greenfield development of 115 hectares to deliver 230 residential units. The project triggers a number of both regional and territorial resource consents, specifically in relation to land use, transport corridors, infrastructure, and subdivision.

B&A will be responsible for coordinating the fast-track application, providing input into the design, oversight of consultation, and preparation of the application.

3.0 Reason for Consent

3.1 Waikato District Plan

The proposal would trigger resource consents under the Waikato District Plan for the following reasons:

- More than two dwellings per urban site [Discretionary & Non-complying Activities];
- Accommodation Facilities;
- Commercial Services;
- Medical Facilities;
- Retailing (café);
- Signage;
- Infrastructure & Servicing;
- Subdivision; and
- Earthworks;
- Transport Corridors.

Overall, under the Waikato District Plan, the proposal requires resource consent as a Non-complying Activity.

3.2 Waikato Regional Plan

The proposal would potentially trigger resource consent under the Waikato Regional Plan for the following reasons:

- Chapter 3 – Water Module

- Groundwater Take
 - To be conservative, a temporary groundwater take will be sought for the purpose of dewatering to lower the groundwater table during construction under Discretionary Activity Rule 3.3.4.24.
 - To be conservative, a groundwater take will be sought for the alternative water supply source (via a bore if the existing water supply network cannot service the development) under Discretionary Activity Rule 3.3.4.24.
- Surface Water Take
 - To be conservative, a surface water take will be sought for the purpose of dust suppression during earthworks under Controlled Activity Rule 3.3.4.16.
 - It is noted that it is not considered appropriate to seek a surface water take in relation to the temporary diversion of groundwater as the surface water will be temporarily diverted via the stormwater channel.
- Discharge Permit
 - The proposal will require resource consent under Discretionary Activity Rule 3.5.11.8 for the discharge of stormwater to a new stormwater basin/stream from the retirement village development.
 - The proposal will require resource consent under Discretionary Activity Rule 3.5.7.7 for the discharge of on-site sewage discharge onto or into land from the retirement village development.
 - To be conservative, resource consent for a discharge of water or sediment-laden water will be sought for the purpose of temporary dewatering activities, which is not provided for and will be sought under Discretionary Activity Rule 3.5.10.2.
- Diversion Permit
 - The proposal will require resource consent under Discretionary Activity Rule 3.6.4.13 to divert groundwater to lower the groundwater table for the purpose of the new stormwater basin.
- Drainage of Wetlands
 - As it has not been confirmed, to be conservative, the proposal will seek resource consent for the potential drainage of wetland(s) under Discretionary Activity Rule 3.7.4.7.
- Drilling
 - To be conservative, the proposal may require drilling for dewatering under Controlled Activity Rule 3.8.4.7.
- Chapter 5 – Land & Soil Module
 - Soil Disturbance
 - The proposal will require resource consent under Discretionary Activity Rule 5.1.4.15 as the soil disturbance activities exceed 1,000m³ across an area of more than two hectares.

- The proposal will require resource consent under Discretionary Activity Rule 5.2.5.3 for large scale overburden disposal.

3.3 National Environmental Standards

The proposal would potentially trigger resource consent under the following National Environmental Standards:

- National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011:
 - The site investigation confirmed that the site is considered to be a 'piece of land' under Regulation 5(7) of the NES:CS as HAIL A10 is more than likely than not to have occurred, as confirmed via the presence of organochlorine pesticides in selected soil samples. Regulation 9(3) for the change of land use and for future soil disturbance as part of future developments requires consent as a Controlled Activity.
- National Environmental Standards for Freshwater Management:
 - Regulation 45C (4) and (5) for the diversion of water and the discharge of water into water within a 100 metre setback of natural inland wetland respectively require consent as a Restricted Discretionary Activity.

4.0 Statutory Planning Framework

4.1 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 ('NPS-FM') seeks to manage natural and physical resources to prioritise firstly, the health and well-being of water bodies and freshwater ecosystems, secondly, the health and needs of people, and thirdly the ability to provide for the social, economic, and cultural well-being of people and communities.

It is considered that the project is consistent with the relevant policies of the NPS-FM that relate to land development for the following reasons:

- The development of Gordonton provides opportunity for ecological restoration of the Komakorau stream portion of the development where riparian planting is minimal and sparse.
- The project seeks to minimise greenhouse gas emissions where possible through this development. The nature of the proposal is to provide infrastructure that will enable efficiencies that will support the reduction of greenhouse gas emissions.
- Mana Whenua have been involved and consulted to this point of the project, which will continue to occur. The project will incorporate cultural values in its design, using Mana Whenua expertise to integrate their values and cultural heritage (which is currently largely invisible).
- Maximising the opportunities within the proposed reserve and open space areas for future enhancement, particularly within the buffer areas including ecological restoration and enhancement, replanting and offsetting (where required).
- Significant opportunities for restoration and enhancement across the site, including through the maintenance of habitat and vegetation cover where possible.

- Ongoing monitoring will take place to ensure the condition of water bodies and freshwater ecosystem is not degraded.

Based on the assessment above, it is considered that the project is consistent with the NPS-FM.

4.2 National Policy Statement for Highly Productive Land

The National Policy Statement for Highly Productive Land 2022 ('NPS-HPL') ensures the availability of New Zealand's most favourable soils for food and fibre production, now and future generations. It is noted the NPS-HPL recently came into effect on 17 October 2022, and was amended in August 2024.

The Gordonton site is generally classified as moderate productive land, as it is mapped as Land Use Capability ('LUC') 2 and some modified soil.

The objective of the NPS-HPL is to protect highly productive land for use in land-based primary production, however, there are exceptions to this in particular circumstances.

As a Tier 1 territorial authority, under Clause 3.6(4), Waikato District Council may allow urban rezoning of highly productive land if:

- (a) the urban zoning is required to provide sufficient development capacity to meet expected demand for housing or business land in the district; and*
- (b) there are no other reasonably practicable and feasible options for providing the required development capacity; and*
- (c) the environmental, social, cultural and economic benefits of rezoning outweigh the environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.*

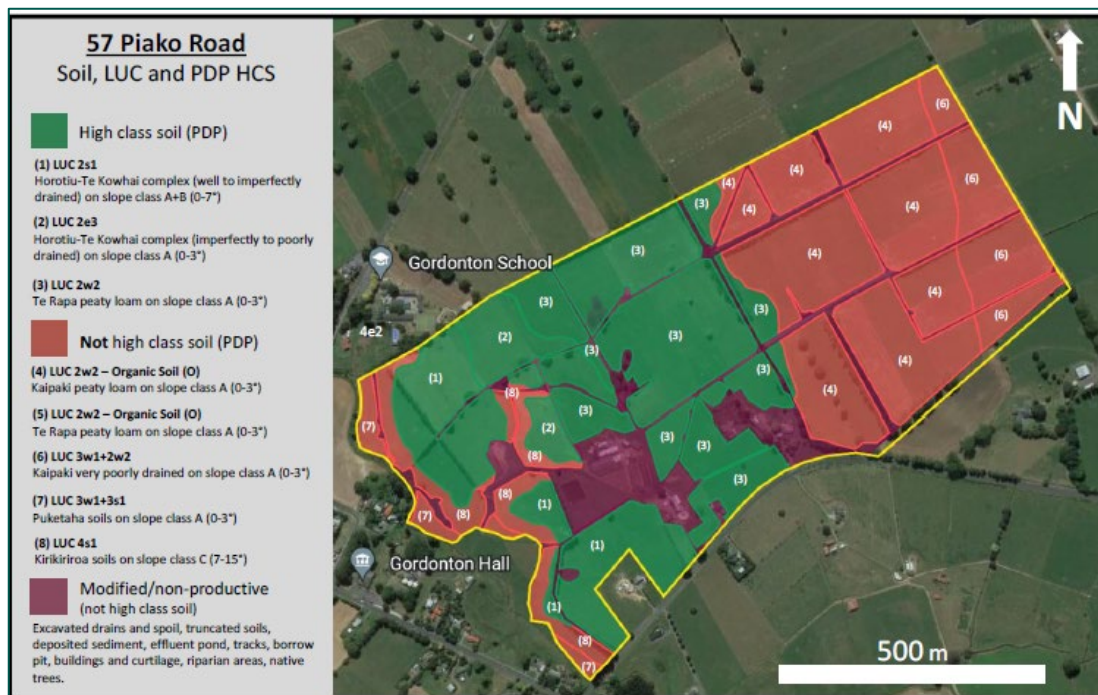
Further, under Clause 3.10, Waikato District Council may allow highly productive land to be subdivided, used or developed if satisfied that:

- (a) there are permanent or long-term constraints on the land that mean the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years; and*
- (b) the subdivision, use, or development:*
 - (i) avoids any significant loss (either individually or cumulatively) of productive capacity of highly productive land in the district; and*
 - (ii) avoids the fragmentation of large and geographically cohesive areas of highly productive land; and*
 - (iii) avoids if possible, or otherwise mitigates, any potential reverse sensitivity effects on surrounding land-based primary production from the subdivision, use, or development; and*
 - (iv) the environmental, social, cultural and economic benefits of the subdivision, use, or development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.*

Firstly, it is importantly noted that the Land Use Capability Classification Assessment concludes the site is made up of a variety of modified and unclassified soil. There is also no presence of Class 1 soil. The balance is made up of Class 2 soil which has modified drainage system in between blocks of land.

With regard to the proposed residential and retirement living development, it is considered this criteria can be met for the following reasons:

- As aforementioned, the productivity of the land is fragmented, as outlined in the Land Use Capability Classification Assessment and shown in the latest PDP HCS from Waikato District Council.



- The supply proposed by Gordonton Country Estate will support a reduction of loss of 'more productive' highly productive land within the district as it provides the necessary supply to meet demand in an appropriate and practicable location in Gordonton.
- The development proposed on site avoids the grazing and farming next to the Komakorau Stream.
- Ecological Solutions prepared an Ecology Memorandum that the current ecological environment is limited as a result of intensive farming, with only exotic shrubs and trees remaining, and low biodiversity. The ecological values of the Site are assessed as low to very low. The proposed lots, road alignments and stormwater management system has been designed to minimise ecological effects through retaining shelter belts and the remnant kahikatea and rimu and by retaining and restoring highly modified streams and areas of wetland where possible.
- Insight Economics prepared an Economics Memorandum that identifies that Gordonton can;
 - Meeting the Needs of an Ageing Population – The proposal caters to a specific demographic of older people who wish to live in a community with others at a similar life stage. This is important, because not only is the local population growing, but it is also ageing. In fact, the number of residents aged 75 and over in the primary catchment is projected to grow by 158% in the next 30 years.

- Releasing Existing Housing to the Market – By providing housing options that cater specifically to older residents, this frees up existing housing for others. For example, older, larger dwellings could be made available for younger families or first homebuyers, for which they are likely to be better suited.
- Boosting the Supply of Housing – The direct boost in dwelling capacity created by the proposal will help narrow the gap between future supply and demand. This will help the market be more responsive to growth in demand, thereby reducing the rate at which house prices grow over time (relative to the status quo).
- Socioeconomic Benefits of Retirement Villages – Retirement villages offer numerous socioeconomic benefits. For example, they enhance wellbeing, support social connection, and often provide a continuum of care, enabling residents to move from independent living to managed care if/when required without the need to relocate.
- One-Off Economic Impacts – Constructing the retirement units and associated facilities enabled by the proposal will generate significant one-off economic impacts.
- Ongoing Employment – In addition, once operational, the various retirement village will likely sustain a diverse workforce.
- Highest and Best Use of Land – The proposal will also enable the land to be put to its highest and best use, which is a precondition for economic efficiency to hold in the underlying land market.
- Foregone Rural Production – The key economic cost of the proposal is forfeiting the site for alternative uses, such as rural production. The impact of this will be reduced by allowing grazing to occur on parts of the subject site.
- It is considered through design, particularly with cultural (As per the CIA) and ecological input, Gordonton can deliver a development that provides environmental, social, cultural, and economic benefits that outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land.

Based on the assessment above, it is considered that the project is not inconsistent with the NPS-HPL.

4.3 National Policy Statement for Indigenous Biodiversity

The National Policy Statement for Indigenous Biodiversity ('NPS-IB') ensures the protection, maintenance and restoration of New Zealand's most threatened indigenous species. It is noted that the NPS-IB recently came into effect, gazetted on 4 August 2023.

It is considered that the project is consistent with the relevant objectives and policies of the NPS-IB for the following reasons:

- This project seeks to maintain and enhance indigenous biodiversity.
- The applicant has regularly engaged with local tangata whenua to recognise and provide for the management of indigenous biodiversity. Several options to managing this indigenous species were considered to ensure a holistic and integrated approach was being undertaken.
- The repurposing of the property from farming to residential for the Gordonton Retirement Village will present new pressures on the natural environment. However, Ngaati Wairere views an opportunity to

engage a relationship with the Gordonton Country Estate to support enhancements to land, water and air

- Ngaati Wairere is yet to determine its position of support of this application and requires time to consider the implication of the collective applications at their table currently. Appreciation is given for the opportunity to provide this Cultural Impact Assessment.
- Gordonton will include a variety of indigenous plants and seeks to retain and enhance indigenous biodiversity, which will promote peoples' wellbeing and allow current and future communities to connect with nature.
- Indigenous biodiversity can be protected from the effects of climate change and be utilised to reduce the effects of climate change, with significant planting of indigenous species proposed for the greenway.
- The project seeks to maintain and enhance existing indigenous biodiversity. Any areas of significant indigenous vegetation or significant habitat of indigenous fauna will be identified and appropriately managed.
- Ongoing monitoring will be undertaken, as is already required in accordance with existing consents.

Based on the assessment above, it is considered that the project is consistent with the draft proposed NPS-IB.

4.4 National Policy Statement on Urban Development

The National Policy Statement on Urban Development 2020 ('NPS-UD') ensures New Zealand's towns and cities are well-functioning urban environments that meet the changing needs of our diverse communities. It removes overly restrictive barriers to development to allow growth 'up' and 'out' in locations that have good access to existing services, public transport networks and infrastructure. It is noted that this legislation was amended in accordance with section 77S(1) of the RMA and notified on 11 May 2022.

The NPS-UD enables the development of land and infrastructure for urban land uses while recognising the national significant of well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing (Objective 1 and Policy 1).

It is considered that the project is consistent with the relevant objectives and policies of the NPS-UD and will contribute to a well-functioning urban environment for the following reasons:

- Gordonton delivers an integrated, multi-functional development that includes over 650 retirement living units and associated ancillary, yet complementary services. This provides the opportunity for a variety of housing types, locations and prices in a logical and accessible location whilst maintaining a rural look, feel and outlook.
- Gordonton enables people to provide for the social, economic and cultural wellbeing, with the development providing ongoing employment opportunities and community opportunities in perpetuity. It's noted that general accessibility, natural and open spaces, and cultural wayfinding along the stream channel is also demonstrated through our careful design.
- The site has good accessibility for all people to services, activities and amenity, particularly into the township of Gordonton and neighboring school and parks. In addition, it encourages and promotes

active transport through a range of walking and cycling options to housing. Local employment, schools, community services and open spaces.

- The project takes into consideration climate change, particularly through the management of flooding hazards via the stormwater management, and incorporates measures to support the reduction of greenhouse gas emissions (such as water conservation and reuse).
- The project is well suited to the local area and is strongly aligned with delivering a well-functioning urban environment that reduces climate change through providing infrastructure and services in an integrated manner.
- The project offers a unique composition of rural retirement living for the diverse region where there will be an increase in rural based retirement where people will want to stay in the community but maintain their lifestyle.

Based on the assessment above, it is considered that the project is consistent with the NPS-UD.

4.5 National Environmental Standards for Freshwater

The Resource Management (National Environmental Standard for Freshwater) Regulations 2020 ('NES:F') sets standards to regulate activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the project are provisions which prohibit works in and around natural wetlands, and works affecting rivers and streams. Resource consent will be required under the NES:F as works are proposed within a 100 metre setback of natural inland wetlands.

Regulation 45C (4) and (5) for the diversion of water and the discharge of water into water within a 100 metre setback of natural inland wetland respectively require consent as a Restricted Discretionary Activity.

4.6 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('NES:CS') sets a nationally consistent set of planning controls and soil contaminant values.

GWE Consulting ('GWE') have undertaken a combined Preliminary Site Investigation ('PSI') for the site, as appended to the referral application.

has identified that the site is the location of a number of verified potentially contaminating 'HAIL' activities associated with its historic use. A number of unverified but suspected activities that may cause localised contaminated soil and water risks have also been identified.

Consequently, the NESCS applies to the site and any subdivision, change in land use or soil disturbance at the site will trigger the requirement of the NESCS for further investigations, soil and water contact and disturbance risk mitigation, and consent.

Evidence suggests that the buildings on site are likely to contain asbestos and lead-based paints that must be identified and managed appropriately prior to demolition to prevent on site contamination during building removal.

Therefore, a Controlled Activity consent under Regulation 9(3) of the NES:CS is required to undertake the change of land use and for future soil disturbance as part of future developments. On this basis, any

requirements of the NES:CS can be addressed as part of an application post-referral and potential risks to human health can be appropriately managed and mitigated.

5.0 Assessment of Effects

The proposal will not generate significant adverse environmental effects, as any adverse effects on the environment will be appropriately avoided, remedied or mitigated to be minor or less than minor in nature. The key potential adverse effects are addressed in general below and should be reviewed in conjunction with the supporting technical expert memorandums accompanying this application.

5.1 Construction Effects

Contaminated Land

As outlined in Section 4.8, the site investigation confirmed that persistent pesticide bulk storage or use is more than likely than not to have occurred on the site. It is considered that this can be mitigated through remediation prior to earthworks commencing on site.

Earthworks

Earthworks for the project will be carried out in accordance with best practice appropriate erosion and sediment control measures to ensure potential adverse effects are avoided or minimised. Earthworks are proposed to be carried out during the summer earthworks season to reduce the potential discharge of sediment into receiving waters. Any potential adverse effects are able to be mitigated and managed via an Erosion and Sediment Control Plan.

Dust

During construction, it is anticipated that there will be dust generated by the earthworks and land disturbance, which is able to be mitigated and managed via an Erosion and Sediment Control Plan.

Construction Noise & Vibration

During construction, noise and vibration is anticipated to occur as a result of the works proposed to be carried out on the site. Construction will be managed in accordance with the NZS 6803:1999 Acoustics – Construction Noise and German Standard DIN 4150-3:1999 Structural vibration – Effects of vibration on structures.

Construction noise and vibration, particularly during any rock breaking, will be managed in accordance with a Construction Noise and Vibration Management Plan ('CNVMP'). The CNVMP will outline measures, such as restrictions on days and hours on noisy works, consultation with neighbours and use of quieter machinery (among others) to ensure that potential construction noise effects of the project are appropriately managed.

Construction Traffic

It is anticipated that there will be potential adverse traffic effects as a result of the construction of Gordonton Country Estate Development. A series of upgrades will be required on adjoining transport corridors, such as Piako Road which will result in potential delays and traffic on these corridors while construction occurs. This will be managed through phasing and delivery during off peak periods.

Construction traffic effects will be temporary and will be managed in accordance with a Construction Traffic Management Plan ('CTMP'). The CTMP will outline measures such as anticipated number of truck movements per day and truck routes (among other measures) to ensure that the potential construction traffic effects of the project are appropriately managed. The bulk of construction and related earthwork traffic movements will be kept within the site constraints and have little impact wider afield.

5.2 Infrastructure & Servicing

Maven Associates have prepared an Infrastructure Memorandum with accompanying drawings, appended to the referral application, that demonstrate that the proposal can be appropriately serviced, hence there is not considered to be any significant adverse effects in relation to infrastructure and servicing.

5.3 Transportation

Commute have prepared a Transportation Memorandum, appended to the referral application, that details the transportation approach and how Gordonton Country Estate Development can integrate with the wider transport network. The design of the proposed transport corridors prioritises safety and emission reduction to ensure alignment with national and regional transport planning documents.

5.4 Character & Amenity

Character

As aforementioned, the site currently predominantly comprises of lots in pasture, rural lifestyle and rural activities. The surrounding area is a mix of rural, rural lifestyle, and residential. Due to the site's proximity to the urban fringe of Gordonton Village and the natural site boundary of the Komakorau Stream, there is an opportunity to integrate with the surrounding mixed character.

As discussed below, the proposal will need to be carefully designed to integrate with the mixed character context of the area, with a strong focus on the transition from urban to rural. This shall include grazing land in and around the site to break up what would be the typical perception of a retirement village. An additional point of difference is also ensuring the site provides connectivity with the village of Gordonton through pedestrian walk ways and/or cycle ways.

Urban Design

Barker & Associates have prepared an Urban Design Memorandum, appended to the referral application, that details the potential urban design effects of the proposal. While the proposal will result in a significant change to the landscape and visual character of the site, the proposal provides for enhancement opportunity, through appropriate landscaping and riparian planting. The project has been designed to sensitively respond to the topographical constraints on the site, and the built form will be well integrated within the environment.

The proposal has been designed in an integrated and coordinated manner which generally maintains key landscape attributes of the surrounding urban/ village environment of the adjoining Gordonton Village settlement.

Ultimately the change to the existing environment is not considered to be adverse in nature and is able to be managed through the design and implementation of the development.

Landscape

Barker & Associates Landscapers have prepared a Landscape Assessment, appended to the referral application, that details the landscape (and visual) effects of the proposed development and how Gordonton can integrate within the environment. This assessment concluded that the site does not contain any natural or cultural elements that provide a 'sense of place' or unique features.

The key landscape effects of Gordonton Country Estate Development are considered to be limited to the integration of the development with the urban fringes of Gordonton. Given the location of the site, the landscaping strategy will need to address the transition from urban environment to rural environment. This is addressed in the Landscape Assessment appended to the referral application.

Heritage & Archaeology

The site has a Site of Significance to Māori (item 284) which is detailed to be the Otaahua Paa and is described as a Paa site with shallow ditch, depressions and a small terrace. An Assessment of Archaeological Values undertaken by Warren Gumbley outlined it can be anticipated that the Māori-made soils and their associated archaeology will be generally affected by development activities, particularly earthworks. Nonetheless, there is an opportunity to preserve elements of the horticultural remains. Preferably, this should involve both borrow pits and the surrounding Māori-made soils. In this case, the focus should be on the large borrow pit 5 and the two nearby borrow pits, as well as surrounding Māori-made soils. This would provide an opportunity for interpretation of the archaeology and the surrounding cultural landscape.

Mitigation of the adverse effects will normally involve the undertaking of archaeological investigations prior to development commencing. This will typically be required as a condition of the Heritage New Zealand Pouhere Taonga Authority.

Overall, heritage effects will be adequately managed through design and flood modelling, such that any adverse effects will be minimised, avoided or managed and without adverse impacts to the receiving environment.

5.5 Cultural

As outlined in Ngati Wairere Cultural impact Assessment (CIA), Mana Whenua have been involved and consulted to this point of the project, which will continue to occur. While Ngati Wairere iwi have exclusive and unchallenged interest in this area, Waikato Tainui and Ngati Haua have also been consulted. Ngati Haua gave all discretion to Ngati Wairere while Waikato Tainui acknowledged Ngati Wairere to lead the CIA work and have final say. They still wished to be kept informed of the projects progress which has been undertaken as progress has been made.

Through ongoing and meaningful engagement with Mana Whenua, it is considered that any potential adverse effects can be appropriately mitigated. Appropriate protocols (such as karakia, cultural monitors and cultural protocols), involvement in the design, and promotion of indigenous planting are examples of mitigation.

The project will incorporate cultural values in its design, using Mana Whenua expertise to integrate their values and cultural heritage (which is currently largely invisible). This is an opportunity to reflect the area's cultural history in the development, including through activities, facilities, forms, artwork, local flora, and materials significant to the reinstatement of their presence and aspirations.

5.6 Ecology

The Ecology Memorandum, appended with the referral application, concludes that there are no significant ecology effects. The current ecological environment is limited as a result of intensive farming, with only exotic shrubs and trees remaining. Overall, biodiversity has been assessed as low.

The initial review identified the following potential ecology effects:

- Diversion of water from a natural inland wetland; and
- Discharge of water into water.

Both these effects are in relation to the 100-metre setback of natural inland wetlands under the NES-FM. Further assessment is required to identify the extent of effect; however, it is concluded that these potential adverse ecological effects will be no more than minor.

5.7 Effects on Greenhouse Gas Emissions

This Project aims to minimise greenhouse gas emissions, where possible through construction, and within the design of the project itself. During construction, greenhouse gas emissions will be reduced through the following measures:

- Minimising the number of truck movements required to manage earthworks material by retaining as much as possible within the site; and
- Minimizing earthworks and heavy transport movements as the cut/fill balance will be neutral.
- A staged construction approach allows for the appropriate management of effects on the environment.

Following the construction of the project, the ongoing reduction of greenhouse gas emissions will be supported by:

- Multi-modal transport corridors that prioritise pedestrians and cyclists along the stream edge;
- Enabling intensified specific urban development, including provision for services and amenities within a walkable catchment to reduce the need for vehicle travel;
- Type of land use does not historically generate extensive vehicle movements as the development is largely self-sufficient.
- Improved connectivity within close proximity to a well-established and growing area of Gordonton.

Overall, it is considered that the project will balance the potential adverse effect of greenhouse gas emissions by providing for a walkable, densified bespoke aged living development that discourages private vehicle movements and appropriately mitigates adverse effects on the environment (where possible).

5.8 Positive Effects

Gordonton will deliver a number of positive effects, including but not limited to:

- Increasing housing supply in the Waikato sub region for aged living.
- Delivery of multi-generational living with a diverse mix of housing typologies to suit a range of people's income bands and typology desires.

- Creation of a well-functioning ‘green’ urban environment that support ongoing use of the land for partial rural purposes that adds a seamless integration with the existing township and adjacent farming community;
- Enhancement of the natural environment through the design which seeks to weave natural features through the staged development with open space and improved accessibility to the Komakorau Stream.
- Innovative design to address climate change and natural hazards, such as inclusion of two solar farms and stormwater design;
- Generation of a wide range of economic benefits, such as providing a direct boost in housing supply to meet growing demand, meeting the needs of an evolving population, and contributing to the recovery of significant infrastructure costs; and
- Alignment with local and regional planning documents, such as Waikato Regional Policy Statement and Future Proof Strategy

5.9 Mitigation

This memorandum, and the supporting memorandums from the technical experts, identify a range of measures to address potential adverse effects and ensure that those adverse effects are avoided, remedied or mitigated. This includes the application of standard and well-established mitigation measures and more bespoke approaches to manage the particular effects of this proposal. These can be addressed through design, conditions of consent, and monitoring.

6.0 Conclusion

Having undertaken a high-level planning assessment, it is considered that there are no planning-related reasons why Gordonton could not proceed under the Fast-Track Approvals Act 2024. Through strong design and technical input, Gordonton can achieve a built form, environment and bespoke aged community that positively impact future residents and the wider Gordonton/Waikato community, without having an adverse effect on the environment.

It is acknowledged that a full and comprehensive Assessment of Environmental Effects will be undertaken as part of the resource consent application, however at this stage, no more than minor adverse effects have been identified that preclude the development from occurring.