

Your Comment on the Ashbourne substantive application

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

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)			
First name	Hayden & Alesha		
Last name	Begovich		
Postal address	<div style="background-color: black; width: 100%; height: 1.2em; margin-bottom: 2px;"></div> <div style="background-color: black; width: 100%; height: 1.2em;"></div>		
Home phone / Mobile phone	<div style="background-color: black; width: 100%; height: 1.2em;"></div>	Work phone	<div style="background-color: black; width: 100%; height: 1.2em;"></div>
Email (a valid email address enables us to communicate efficiently with you)	<div style="background-color: black; width: 100%; height: 1.2em;"></div>		

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

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

To the Fast Track Panel

**Re: Objection to Proposed Ashbourne Development Adjacent to [REDACTED]
Matamata**

We are writing to formally oppose the Ashbourne development surrounding our property, which includes a high-density residential subdivision, rest home complex and large-scale solar farms.

This development poses significant public health, environmental, amenity, infrastructure, and safety concerns, and will cause long-term adverse effects for existing residents and the wider community.

SOLAR FARMS:

1. Electromagnetic fields (EMF) and potential health implications

Our family's opposition to the solar farms is not based on ideology, but on lived experience. Our son was diagnosed with lymphoma at seven years old and is currently in Starship hospital in Auckland, undergoing a stem-cell transplant. While we don't currently live on the property, the intention is to build a family home where he can feel safe and is able live a healthy and joyful life.

As a family, we have been advised to minimise unnecessary environmental exposures and potential carcinogenic influences. The introduction of a large industrial-scale solar installation — with its associated electromagnetic fields (EMFs), continuous inverter operation, and electrical infrastructure within close proximity, creates profound anxiety and concern.

We know that solar farms generate low-level electromagnetic radiation from inverters, transformers, and cabling. Though these emissions are classified as non-ionising, the long-term health impacts remain uncertain, particularly for vulnerable individuals such as our son.

There is a growing body of research that suggests possible links between extremely low-frequency electromagnetic fields and certain cancers. Below are several academic articles that support this:

- Li et al. (2022): Found that children exposed to ELF magnetic fields $\geq 0.2 \mu\text{T}$ had a 26% higher risk of childhood leukaemia ([PubMed 33989337](#)).
- Huss et al. (2024): Reported increased odds of leukaemia and DNA damage in ELF-exposed animals ([PubMed 39746455](#)).
- Maffei (2022): Observed “a positive relationship between ELF magnetic field exposure and some types of cancer” (Int J Mol Sci, [PMC8835851](#)).
- Springer (2022): Laboratory testing found 50 Hz magnetic fields increased viability of breast cancer cells after 96 hours ([link.springer.com](#)).

While these studies do not establish causation, they highlight sufficient uncertainty to justify the safety of those people living in close proximity to the solar farms.

2. Visual Impact

The proposed solar farm is located immediately adjacent to established residential dwellings and sits on the boundary (with no buffer zone) of rural-residential zoned land, which could/ will be developed into further properties. This proximity is incompatible with the existing rural-residential zoning and will introduce industrial activity into a peaceful, low-density community.

Residents will be exposed to continuous inverter hum, security lighting, and potential EMF emissions, all of which reduce residential amenity and sense of safety.

The proposal will drastically alter the rural character of our area. The scale, reflectivity, and fencing associated with a utility-scale solar farm create a harsh industrial aesthetic that is entirely at odds with neighbouring rural and residential properties.

Although the application proposes vegetation screening, such planting will take many years to mature. During that time, residents will face significant visual pollution, reduced natural outlook, and diminished enjoyment of their properties.

This development represents an eyesore that will permanently erode the rural amenity values that our community treasures.

3. Property-value implications

Living adjacent to an industrial solar farm potentially impacts the value of the properties surrounding it for all the reasons that we have stated in this response.

For residents whose homes represent their primary financial asset, these impacts are devastating and unjustifiable.

4. Inappropriate use of productive rural land

Loss of classified high quality (Class 1 & 2) soils.

The sites proposed for the solar farms comprises productive rural land situated at the edge of the town boundary. This land currently supports agriculture and has long-term value for local food and agricultural production.

Using fertile land for industrial-scale energy generation and dense housing is short-sighted and unsustainable. Solar infrastructure should be located on brownfield or industrial sites, not on land capable of contributing to food security and rural economic stability. Once converted, such land cannot be easily returned to productive use.

Where the north solar farm is proposed, this land has the highest contour on Station Road, so it seems incomprehensible to propose a solar farm on this Class 1 and 2 productive rural land. From our point of view, it seems that the proposed solar farms has a political agenda and by its inclusion in the proposal it is more likely that the application will be accepted under the fast-track legislation. We understand that the developer will not be developing the farms themselves and will on sell the bare land with applicable resource consents to third parties, therefore it seems that it is an attempt by Ashbourne to maximise profits while failing to consider neighbouring families and their properties.

HIGH DENSITY HOUSING & RETIREMENT VILLAGE:

1. Unsuitable site conditions: drainage, flooding, and liquefaction

Unsuitable land for proposed development as per **Substantive Application** - Appendix 1M – Geotechnical Settlement states – Liquefaction – for IL2 structures expect a ground level fall of 75mm – 150mm (In a liquefaction event, while this is not as material in Rural Residential, In High Density Residential this is disastrous in relation to both houses and services). Possible liquefaction issues are also brought up in the Barr Harris report submitted by Highgrove.

Insufficient / Unsuitable Drainage of Stormwater - **Substantive Application** - Appendix 5F Engineering Drawings C400 Stormwater - In both the residential subdivision and the retirement village, each lot will have an individual rainwater soakage pit for roof water and a connection into the roadside soakage trenches and rain gardens. Stormwater from the roads will also feed into the roadside soakage trench and rain gardens. There are no piped stormwater drains in the subdivision as the ground water raises through the winter / spring months having hard surfaces dumped into ground soakage where is this water going to go if the soakage is not there. We ask that you take note of the lived experience included in Highgrove's submission on stormwater as there will be in many other submissions with issues of stormwater and flooding. The information provided by Ashbourne is ill informed, with incorrect and is based on readings taken at minimal points and over inadequate time frames. Our concern other than the increase in static water levels, is the drain on the Eastern and western side of Highgrove being unable to take additional water in a heavy rain event resulting in the flooding of Station Road and adjoining properties. That said we take comfort in having Dr Nigel Mark -Brown on the Panel with significant expertise in this area and also the Panels ability to have the applicants reports peer reviewed.

Included in the Begovich Investments Ltd resource consent with Matamata Piako District Council, the sites on the western boundary are subject to a building RL level of 2m above the western boundary drain, due to the risk of flooding. However, Ashbourne Developments has proposed to put a retirement village with 250+ houses on the land and are proposing to build at drain level, when flooding is a known issue, and the land is well known for being 'wet'. The land is currently being used as a farm, and the paddocks in question, have been contoured into rolling mounds in order to divert both ground and flood water through underground pipes that feed directly into the drain. It is clearly evident that if the land used for farming has had to be contoured to account for the water during the wetter months, then what effect will 250+ houses have, in addition to their roof and hard stand water runoff? What affect is this additional run off water going to do to neighbouring properties?

The land proposed for development is consistently wet, with poor natural drainage, a high-water table, and a history of stormwater pooling. It is also identified as a high liquefaction risk area. Reading through the Ashbourne's application, they themselves state that the land is wet and is also evident by the fact that this years local A&P show had to be cancelled as the land was too wet to operate the event.



Image of past flooding of neighbouring property ([REDACTED]) to the proposed retirement village. What affect will 250+ retirement houses do to an area already well known for flooding and wet ground?



Western boundary of Highgrove/ Ashbourne: Drain overflowing following 50-60mm of rain. This is the location of where the retirement village housing is being proposed to be built at drain level.



Highgrove Eastern Boundary drain Station road following overnight rain event.

2.Sewerage treatment and disposal - Referral Application - Appendix 4 – Infrastructure Memorandum

“The treated greywater would discharge to the ground prior to entering an artificial wetland. The treated sludge would then be carted offsite using a honey sucker truck and then sent to a nearby approved landfill or worm farm for offsite disposal”.

From our opinion, the sewerage treatment and disposal proposal from Ashbourne seems third world. It doesn't appear to provide long term sustainable infrastructure for the advancement of the community. The council has specifically stated that it already has a 10-year housing plan with adequate land available for development on the eastern side which has the ability to tap into

established infrastructure **therefore we question whether there is even a need for this development in the first place?**

It also appears that the final sewerage disposal is missing in Ashbourne's Substantive Application.

As we have indicated above, introducing dense housing, roads, and infrastructure on such ground presents multiple significant hazards that need to be considered:

- Increased flooding and surface runoff.
- Potential failure of stormwater systems;
- Structural instability during seismic events;
- Contamination of neighbouring properties and waterways.

These conditions make the site **inappropriate for intensive residential or rest-home development**, particularly for elderly and medically vulnerable populations. Comprehensive hydrological and geotechnical assessments must be undertaken before any approval is granted.

3. Traffic and infrastructure capacity

The proposed subdivision and rest home will generate substantial increases in traffic flow along rural roads that are not designed for urban-level volumes.

Current access routes are narrow, lack proper shoulders, and have limited visibility. They already experience waterlogging and surface degradation during wet weather. The addition of high-density housing, construction vehicles, service deliveries, and emergency vehicles for the rest home would overburden existing infrastructure and raise serious safety concerns for residents, pedestrians, and school children.

Without major upgrades — which have not been proposed — the **road network is unsuitable for this scale of development.**

9. Lack of Economic Benefit

We understand that the premise of the Fast-Track Approvals Act 2024 is to provide a streamlined decision-making process for infrastructure, housing and development projects that have a “significant regional or national economic benefits”. We argue that there is already an **oversupply of aged care** in the Matamata area, and the development **adds no further benefit to the community**. We also argue that housing growth must go hand and hand with employment opportunities and feel that the lack of commercial land being opened up and developed, enticing business to the community, means that there is limited employment opportunities for the 500+ houses that are proposed to be developed.

11. Conclusion

We ask that the proposal be **DECLINED** in its current form. The proposal does not consider good town planning or moving the economy forward. It is an opportunity to rezone land and maximise profits for the developers at the expense of surrounding neighbours, councils and ratepayers.

As explicitly stated in the response we do not feel that the development is needed, it is in the wrong location on unsuitable land.

We also advise to refer to the reports previously provided by the Highgrove submission, where both The Property Group and Barr and Harris advise that there is 30 years supply of suitably zoned land for future residential without the problems that the Ashbourne proposal would bring.

Yours sincerely,

Hayden & Alesha Begovich



Thank you for your comments